

**CITY OF LOS ANGELES &
THE HOUSING AUTHORITY OF THE CITY OF LOS ANGELES**

ASSESSMENT OF FAIR HOUSING PLAN

NOVEMBER 6, 2017



Prepared by the Los Angeles Housing + Community Investment Department, the Housing Authority of the City of Los Angeles, Enterprise Community Partners, and the Lawyers' Committee for Civil Rights Under Law

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I. Executive Summary

Los Angeles (LA) is a city facing a pivotal moment. Although LA remains one of the premier cities in the United States, it faces a variety of serious fair housing challenges. The City and broader region are in the midst of an affordable housing crisis. Gentrification and other structural forces, including but not limited to restrictive land use policies in high opportunity areas, have led to rising housing prices and the loss of affordable housing stock. The need for affordable housing outstrips the current supply. Large numbers of low- and moderate-income residents, who are disproportionately people of color and persons with disabilities, spend at least 30% and sometimes 50% of their income on housing payments. Los Angeles has one of the highest housing costs in the country; as a result, many low-income residents are now at risk of being displaced from their homes and communities. Social and economic opportunity is increasingly out of reach in LA for many people of color, persons with disabilities, and large families with children. The City of Los Angeles must continue to take strong action to meet these challenges.

This joint Assessment of Fair Housing (AFH) for the City of Los Angeles and the Housing Authority of the City of Los Angeles (HACLA) provides a comprehensive framework for improving access to housing and opportunity for all Los Angeles residents and promoting equity and justice for historically marginalized groups. The AFH provides an overview of demographic data, examines fair housing issues, evaluates contributing factors for each issue, and outlines meaningful goals as well as strategies to implement in order to achieve positive change and overcome those fair housing issues and contributing factors.

The AFH process has its roots in the Fair Housing Act of 1968. The Fair Housing Act not only prohibited discrimination in housing on the basis of protected characteristics but also created a duty to affirmatively further fair housing through actions designed to overcome the legacy of segregation, unequal treatment, and historic lack of access to opportunity in housing. In 2015, the U.S. Department of Housing and Urban Development (HUD) adopted a final rule to improve the manner in which its grantees comply with the duty to affirmatively further fair housing. The rule replaced the Analysis of Impediments to Fair Housing Choice planning process approach, which had been in place for two decades, with the AFH. The AFH strengthens the process by which certain HUD grantees assess fair housing issues in their jurisdictions and establish goals and strategies to address them. HUD requires grantees to use an assessment tool to identify fair housing issues and provides data relating to certain key issues. The AFH process recognizes the importance of local decision-making and establishes guidelines to help HUD program participants make well-informed decisions about fair housing issues and ultimately to meet their obligation to further fair housing.

The Los Angeles Housing and Community Investment Department (HCIDLA), which is a Department of the City of Los Angeles, and HACLA have retained Enterprise Community Partners (Enterprise) and the Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee) to prepare this Joint AFH. To complete the AFH, HCIDLA, HACLA, Enterprise and the Lawyers' Committee engaged in an extensive community participation process and received input from a wide range of stakeholders. Additionally, Enterprise and the Lawyers' Committee conducted thorough research on a variety of issues and reviewed and analyzed a wealth of data provided by HUD, HACLA, and the City.

The AFH analyzes a variety of fair housing issues including patterns of integration and segregation of members of protected classes; racially or ethnically concentrated areas of poverty (R/ECAPs) within Los Angeles and regionally; disparities in access to opportunity in education, employment, transportation, environmental health, and exposure to poverty; and disproportionate housing needs. The AFH also

examines publicly supported housing, fair housing issues for persons with disabilities, and private and public fair housing enforcement, outreach capacity, and resources. In order to best position HCIDLA and HACLA to address these fair housing issues, the AFH analyzes contributing factors for each fair housing issue. Some of the key contributing factors identified during the AFH process include the availability of affordable units in a range of sizes, displacement of residents due to economic pressures, lack of access to opportunity due to high housing costs, land use and zoning laws, loss of affordable housing, private discrimination, and source of income discrimination.

LA is the nation's second largest city, and the Los Angeles-Long Beach-Anaheim, CA Metropolitan Statistical Area (MSA) is the nation's second largest metropolitan area. With a population of 3,971,896 as of the 2015 American Community Survey 1-Year Estimates, up from 3,792,621 as of the 2010 Census, the City is also undergoing rapid growth. The same is true of the metropolitan region, which has grown to 13,340,068 as of 2015 from 12,828,835 in 2010. If anything, the picture this data paints is of a misleadingly small region. Although Riverside, San Bernardino, and Ventura Counties are not included in the MSA, the population centers of those counties are very much a part of regional housing, transportation, and employment networks. When economically mobile households leave disinvested portions of the City of Los Angeles for greater access to opportunity, affluent Ventura County suburbs like Simi Valley and Thousand Oaks are as frequent destinations as Rancho Palos Verdes or Newport Beach, both of which are located within the MSA. Likewise, when low-income people of color are displaced from gentrifying neighborhoods in Central LA, they are as likely to move to Inland Empire destinations like San Bernardino and Moreno Valley as they are to Palmdale and Lancaster in the Antelope Valley in Northern LA County.

In addition to its sheer size, both the City and the region are notable for the extent of their diversity. No racial or ethnic group comprises a majority of the population of either the City or the region, and there are significant populations of Black, Asian or Pacific Islander, non-Hispanic White, and Hispanic residents, with Hispanics comprising a plurality of the population citywide and regionally. In general, Black and Hispanic residents are more concentrated in the City, and non-Hispanic White and Asian or Pacific Islander residents are more likely to live in suburban communities within the region. Over time, the Black and non-Hispanic White populations of both the City and the region have been decreasing while the Hispanic and Asian or Pacific Islander populations have been increasing.

LA's diversity, however, is not reflective of residential racial and ethnic integration. In fact, the City and the region remain starkly segregated with Black and Hispanic residents facing the highest levels of segregation and often having limited residential options outside of R/ECAPs, which are majority non-White census tracts with poverty rates of 40% or more. Black Angelenos primarily live in South LA and in cities and unincorporated areas in LA County that border South LA, such as Inglewood, Compton, Carson, and Gardena. The Antelope Valley and farther areas of the County such as Lancaster and Palmdale also have significant Black populations who have migrated from the City. Hispanics primarily live in East LA, the Westlake District and Pico-Union near Downtown LA, South and Southeast LA, the Gateway Cities in Southeast LA County, the eastern San Fernando Valley, and Santa Ana and Anaheim in LA County.

This segregation as well as a myriad of other factors discussed in this AFH have had significant and pervasive harmful effects on quality of life and access to opportunity for Black and Hispanic residents of the City and the region. The neighborhoods in which Black and Hispanic residents disproportionately reside have chronically low access to proficient schools and clean air. Many are areas of concentrated poverty where households experience overcrowding and severe housing cost burden. Private discrimination coupled

with low economic mobility and public policies that reinforce existing demographic patterns have limited the ability of residents to achieve the widely shared goal of providing a better life for their children. And, when historically segregated neighborhoods that are plagued by disinvestment begin to see an inflow of private capital and public improvements, displacement to newly emerging R/ECAPs on the periphery of the region often follows close behind.

For persons with disabilities, the dimensions of segregation and lack of access to opportunity are not primarily spatial. Instead, the structural challenges facing persons with disabilities often relate to insufficient resources for home and community-based services, a shortage of integrated housing in the community, including permanent supportive housing, and ineffective coordination between housing and service delivery systems. The combination of resource shortages, discrimination in the private market and the failure to provide reasonable accommodations may push persons with disabilities into congregate settings like large group homes and institutions like nursing homes. Lack of access to opportunity for persons with disabilities is particularly acute in the area of employment where labor force participation is chronically low and persons with disabilities who have jobs often work for less than minimum wage.

During the AFH process, the City, HACLA, Enterprise, the Lawyers' Committee, and numerous community stakeholders proposed several broad goals and specific strategies to address the types of fair housing issues and contributing factors affecting people of color, large families with children, and persons with disabilities discussed. These include:

Goal 1: Increase the stock of affordable housing throughout the city, particularly in neighborhoods of opportunity.

Strategies

1. Adopt an Affordable Housing Linkage Fee to fund the City's affordable housing programs and to encourage developers to produce affordable housing in new housing development.
2. Study the Affordable Housing Linkage Fee's economic impact on the development market and make recommendations to Elected Local Officials for strengthening the inclusionary set-aside requirements of the policy for new housing developments.
3. Identify and allocate city-owned land for affordable housing, particularly in current and emerging high-opportunity areas.
4. Remove barriers to producing affordable housing by streamlining the development process, including in high-opportunity neighborhoods to decrease segregation and increase integration of protected classes (e.g., people with disabilities).
5. Increase the stock of affordable housing for people experiencing homelessness using the following tools/resources:
 - Measure HHH
 - Transit Oriented Community Program
 - Updated Density Bonus
 - Unpermitted Dwelling Unit Ordinance

- Shallow Subsidy Program
 - Comprehensive Homeless Strategy
6. Develop a siting policy for permanent supportive housing development projects and a geographic distribution policy to be presented to Local Elected Officials for consideration and adoption.
 7. Explore the feasibility of adopting and implementing the city's Motel Interim Conversion Ordinance as HACLA proceeds with its HUD-Veteran Affairs Supportive Housing motel conversion program.

Goal 2: Preserve the existing stock of affordable rental housing and rent stabilized housing.

Strategies

1. Develop a citywide no-net-loss of affordable housing policy that is included in land-use plans, local laws, community plans, and Requests for Proposals for funding for affordable housing.
2. Increase dedicated City staff to support non-financial restricted affordable housing preservation initiatives including the maintenance of an early warning system to track at-risk housing, notification enforcement, as well as property owner and tenant outreach and education efforts.
3. Extend affordability restrictions through loan extensions, workouts and buy-downs of affordability.
4. Strengthen and expand education and outreach to tenants and owners of affordable rental housing at risk of conversion to market rents that include options for nonprofits and/or tenants to purchase expiring properties.
5. Enhance enforcement of codes and regulations around habitability.
6. Preserve at-risk housing through the issuance of Tax-Exempt Bond financing.
7. Explore the development of a pilot multifamily over-the-counter rehabilitation loan program.
8. Support the implementation of mandatory seismic retrofits of soft-story buildings.

Goal 3: Prevent displacement of low- and moderate-income residents.

Strategies

1. Expand and strengthen support against unjust evictions, including just cause evictions and rent control policies.
2. Develop and implement an acquisition and rehabilitation loan program for small multi-family properties located in areas experiencing displacement pressures. Use a set of identified metrics to help determine impacted areas in the City.

3. Explore the feasibility of a “Right to Counsel” Ordinance to protect tenants’ legal rights.
4. HCIDLA to collaborate with HACLA to examine the feasibility of achieving consistency between standards--Housing Quality Standards, Systemic Code Enforcement Program violations and LA Municipal Code standards--for privately owned housing to reduce displacement.
5. Establish a working group comprised of tenants, landlords, attorneys and judges to explore the creation of a housing court.
6. Strengthen the Rent Stabilization Ordinance awareness comprehensive tenant outreach and education campaign on tenants’ rights, obligations, and resources in multiple languages; prioritize resources in areas most likely to experience displacement.
7. Stabilize families and neighborhoods by increasing homeownership opportunities to residents of the City of Los Angeles.
8. Study the feasibility of a flexible rent subsidy program to stabilize low-income renters and homeowners and/or elderly residents and tenants occupying below-market rate rent controlled units.
9. Use best practice models for meaningful community engagement in planning and development decisions.
10. Coordinate with the Los Angeles Police Department on the review and potential revision of their training curriculum addressing landlord/tenant disputes and fair housing to ensure protections for all members of protected classes under.
11. Develop mechanisms to encourage landlords to accept third-party checks from tenants (e.g., domestic violence victims) to reduce payment discrimination through the creation of a task force.

Goal 4: Ensure equal access to housing for persons with protected characteristics, lower-income, and homeless residents.

Strategies

1. Study the feasibility to develop a pilot County-funded Rental Assistance Program.
2. Expand source of income protections to include Housing Choice Vouchers and seek improvements to the Section 8 program to incentive landlords to participate in the program.
3. Establish a working group consisting of stakeholders to study the feasibility of implementing an anti-tenant harassment ordinance.
4. Ensure HACLA policies and practices advance equal access to housing (reasonable accommodation, eligibility discretion, partnership with law enforcement in evictions, use of arrest records).

5. Enforce fair housing protections for LGBT protected classes, including gender non-conforming and non-binary persons.
6. Strengthen fair housing protections regarding ancestry and national origin (including immigrants and refugees) that prevent disclosure or threats to disclose tenants' immigration or citizenship status to authorities.
7. Ensure the Coordinated Entry System matches people with physical disabilities with designated accessible housing units.
8. Ensure people with disabilities who cannot provide detailed personal/medical information still have access to the Coordinated Entry System.

Goal 5: Expand access to opportunity for protected classes.

Strategies

1. Implement Equitable Transit-Oriented Development utilizing Measure JJJ and TOC.
2. Maximize and secure fair share of funding from the State of California's Cap & Trade Program (the Greenhouse Gas Reduction Fund), to improve housing opportunities, increase economic investments and address environmental factors in disadvantaged communities.
3. Encourage mobility among residents living in subsidized housing in areas of poverty, particularly in R/ECAPs.
4. Enhance the City's partnership with LA Metro and further the implementation of the City's Memorandum of Understanding with LA Metro to expand the development and preservation of affordable housing and related programs as prioritized by the LA Metro Board.
5. Partner with Los Angeles Unified School District to expand access to proficient schools through housing and community development programs and activities.
6. Adopt the Clean Up Green Up ordinance's regulations on new or expanding industrial operations and other increased land use protections to diminish the public health threats of subject uses in close proximity to publicly habitable space.
7. Partner with LAPD to evaluate the feasibility and efficacy of creating a dedicated Hate Crimes Investigative Division.
8. Implement developer incentives to promote increased local hiring preferences on all housing projects.
9. Target workforce development resources in R/ECAPs to improve economic mobility.

10. Explore the feasibility of additional educational resources for public housing residents to improve educational outcomes including Saturday and Summer programs.
11. Enhance partnerships that improve environmental and health outcomes for low-income and public housing residents.
12. Partner with Los Angeles County to further explore ways to expand access to quality affordable housing through housing and community development programs and activities.

Goal 6: Increase community integration for persons with disabilities.

Strategies

1. Require at least 10% of total units in all multi-family developments receiving public funds or funded with multi-family mortgage revenue bonds to be accessible to persons with mobility disabilities and at least 4% of total units to be accessible for persons with hearing and/or vision disabilities.
2. Require at least 10% and no more than 25% of units in all special needs developments or permanent supportive housing developments receiving public funds to be set aside for persons with disabilities, including individuals transitioning from institutional settings and individuals who are at risk of institutionalization.
3. Provide equal accessibility design training for housing developers, architects, and contractors as well as fair housing training for housing developers and property managers who receive public funds.
4. Increase access to integrated employment for persons with intellectual and developmental disabilities by partnering with the regional centers to connect individuals to job opportunities with public entities.
5. Provide training to service providers on adapting their models to meet the needs of individuals with disabilities in scattered sites.

These goals and strategies are crucial for improving fair housing opportunities in LA and will inform the City's and HACLA's plans going forward. Some of these goals and strategies build upon foundations that have already been created while others will require more work. Although there may be challenges in implementing the strategies laid out in this AFH, the City and HACLA have already demonstrated a proactive and collaborative approach that will aid future efforts to realize the goals of the AFH. Fully achieving these goals not only will allow Los Angeles to meet its obligation to affirmatively further fair housing, but also will establish the City as a nationwide leader in promoting access to opportunity for members of protected classes.

II. Community Participation Process

Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

In order to ensure that the analysis contained in an AFH truly reflects conditions in a community and that the goals and strategies are targeted and feasible, the participation of a wide range of stakeholders is of critical importance. The City of Los Angeles (HACLA and HCIDLA), Enterprise, and the Lawyers' Committee have undertaken robust AFH outreach over a nine-month period, including organizing meetings with a large array of stakeholders, conducting focus groups, utilizing traditional and social media outlets, and disseminating surveys. This outreach took place in two phases: Phase 1 was designed to elicit input during the development of the draft AFH and Phase 2 focused on gathering feedback on the draft AFH.

Phase 1: In-person Meetings

Community Meetings

During the months of February and March 2017, the City of Los Angeles (HCIDLA and HACLA) held nine community meetings as part of its AFH work. The City received assistance from Enterprise and the Lawyers' Committee to conduct the community meetings for City residents at various locations throughout Los Angeles. There were a little more than 180 total participants at the nine meetings held in the City's Area Planning Commission sections of the City. The attendees included service providers, property owners, community organizers, and community residents. The attendees learned the basics about the City of LA's AFH purpose and their rights as renters; they also expressed their personal experiences living in Los Angeles. These nine community meetings concluded the City's first phase of public meetings for the AFH process.

Stakeholder Meetings

The City also participated in numerous meetings with hundreds of stakeholders, many representing protected classes, to present the City's AFH process, as well as to request direct input and address questions to help inform AFH goals and strategies. These in-person meetings occurred for one and a half hours each with a total of eight groups (e.g., affordable housing developers, landlords and lenders, Department of City Planning staff, domestic violence service providers, LGBTQ/Transgender community, lenders, philanthropy/foundations, and environmental justice advocates). The meetings allowed for full discussions and valuable input from all attendees based on their areas of expertise and feedback on how fair housing impacts their work.

The Alliance for Californians for Community Empowerment (ACCE) and the Housing Rights Center (HRC), with assistance from the Grounded Solutions Network, convened a series of well-attended meetings with service providers, advocates, and residents to identify barriers to fair housing choice and to develop a list of goals and strategies designed to mitigate or eliminate these barriers. After they developed an extensive list of goals and strategies, ACCE and HRC met with City staff, both HCIDLA and HACLA, as well as Enterprise and the Lawyers' Committee to present the following discussion topics: Anti-

Displacement and Preservation, Protection of Rights, and Production. The meetings provided valuable insight into the struggles residents of low-income communities of color face and resulted in dozens of goals and strategies that have been incorporated into the AFH. In addition, ACCE and HRC submitted written comments to the draft AFH on behalf of 42 community-based organizations.

HCIDLA and HACLA focused on engaging and encouraging community participation by populations that are typically underrepresented in local planning processes through collaboration with community organizations that work directly with the targeted populations. The City AFH team engaged in targeted outreach to residents of R/ECAPs by collaborating closely with community organizations and Resident Advisory Councils representing HACLA tenants. The team distributed flyers and surveys in all public housing developments.

For persons with limited English proficiency (LEP), all flyers announcing public meetings were translated into Spanish. All community meetings had Spanish translators and transcription services. Several community meetings were held in Spanish, with English translation. Some printed materials were available in English and Spanish, including the AFH Plan Executive Summary. In addition, all meetings took place in facilities that are accessible to persons with ambulatory disabilities and the public was given 72-hours prior to each meeting to make a request for reasonable accommodations.

Below is a list of stakeholder meetings:

Fair Housing Advocates	December 13, 2016
Regional Developer Meeting (Held in collaboration with the LACDC and HACLA)	January 18, 2017
Regional Government (Held in collaboration with LACDC and HACLA)	January 18, 2017
Local/City Government	January 19, 2017
Civil Rights Advocates	March 2, 2017
ACCE and Housing Rights Center	May 16, 2017
ACCE and Housing Rights Center	June 22, 2017
ACCE and Housing Rights Center	July 24, 2017
ACCE and Housing Rights Center	July 25, 2017
ACCE and Housing Rights Center	September 12, 2017
Affordable Housing Developers	July 27, 2017
Landlords, Building Trades Association, Chamber of Commerce, Developers	July 28, 2017
Domestic Violence Service Providers	July 31, 2017
LGBTQ/Transgender Community	July 31, 2017
Lenders	August 1, 2017
Philanthropy/Foundations	August 1, 2017
Environmental Justice Advocates	August 1, 2017
Asian/Pacific Islander Community	September 13, 2017
Hispanic/Latino Community	September 13, 2017
African American Community	September 13, 2017
Disability Rights Community	September 13, 2017

HCIDLA and HACLA staff also presented an overview of the City’s AFH process, efforts, and objectives for various committee and commission bodies and City offices, including:

Affordable Housing Commission	November 30, 2016
Human Relations Commission	December 14, 2016
Status of Women Commission	December 16, 2016
Affordable Housing Commission	January 18, September 20, 2017
Transgender Advisory Committee	January 19, 2017
Community Advisory Committee	January 19, 2017
HCIDLA’s front counter/hotline staff	May 25, 2017
Los Angeles Mayor’s Office	June 19, September 28, 2017
Council District 1 and Chief Legislative Office	September 13, 2017
HCIDLA’s Executive Staff	July 26, September 12, 2017
HACLA Board of Commissioners	July 27, 2017, October 31, 2017
City of LA Department of Planning	July 28, 2017
Los Angeles Homeless Services Agency	August 8, 2017
Los Angeles Unified School District	September 12, 2017
Los Angeles Police Department	September 12, 2017
Los Angeles City Council Housing Committee	September 27, October 11, 2017
Los Angeles City Council	October 17, 2017

Public Meetings

Nine public meetings were held in every quadrant of the City, including the North Valley, Harbor, Central Los Angeles, West Los Angeles, South Valley, South Los Angeles, and East Los Angeles. The locations were chosen based on proximity to public transportation and physical accessibility. Below is a list of the public meetings held to date:

North Valley	February 21, 2017
Harbor	February 22, 2017
Central Los Angeles	February 23, 2017
West Los Angeles	March 1, 2017
South Valley	March 2, 2017
South Los Angeles	March 6, 2017
East Los Angeles	March 13, 2017
South Los Angeles	March 21, 2017
North Valley	March 23, 2017

Focus Groups

The City of Los Angeles, the Community Development Commission of the County of Los Angeles (LACDC) and HACLA established four focus groups, which met three separate times (for a total of 12 meetings). Conversations focused on the topics of Disability and Access, Transportation and Jobs, Educational Opportunities, and Healthy Neighborhoods. During these meetings, participants developed contributing factors, recommended goals and strategies, and identified responsible entities for implementing the strategies.

This effort was a true collaboration, involving numerous public and nonprofit agencies. Community-based organizations allowed the City to use their offices/conference rooms to hold a series of focus groups. The following entities offered their spaces to the City for a three-week meeting series: Bet Tzedek Legal Services, Strategic Action for a Just Economy (SAJE), Legal Aid Foundation of Los Angeles (LAFLA), and Community Development Technologies (CD Tech).

The focus groups were instrumental in identifying contributing factors that led to segregation and lack of opportunity in Los Angeles as well as helping to shape the goals and strategies to mitigate or eliminate the identified contributing factors.

Below are the dates the focus group meetings were held:

Disability and Access	January 10, 2017/February 1, 2017/February 22, 2017
Transportation and Jobs	January 10, 2017/February 1, 2017/February 22, 2017
Educational Opportunities	January 11, 2017/February 2, 2017/February 23, 2017
Healthy Neighborhoods	January 11, 2017/February 2, 2017/February 23, 2017

Resident Advisory Council

HACLA has conducted extensive outreach to its public housing residents. HACLA staff distributed public notices, flyers and surveys at all its housing management offices. In addition, presentation on the AFH were made in both English and Spanish at the three Resident Advisory Council meetings listed below:

January 20, 2017
February 17, 2017
June 16, 2017

Phase 1: Media

HCIDLA launched an AFH website: www.CityofLAFairHousing.org and a blog to properly inform the public about the AFH, meetings, surveys, and other updates during the process. AFH information is also posted under "Public Notices" on the City of LA's website - <https://www.lacity.org/>. The City also utilized Facebook and Twitter to promote the AFH process and secured assistance from the Department of Neighborhood Empowerment and the Department of Disability for further outreach.

The Mayor's Office and various Council Districts assisted HCIDLA to do extensive outreach by posting the City's AFH survey on NextDoor (a mobile app), Twitter, and other media outlets. HCIDLA and HACLA also posted and sent out the AFH survey links to all of its networks and constituents.

LA Metro announced and advertised the City's AFH community engagement process by sending out mass emails to stakeholders and residents. This helped in extending the City of LA's reach to the public. In addition, the Los Angeles Homeless Services Authority (LAHSA) posted Twitter announcements of the City's AFH process.

Phase 1: Surveys

In addition to face-to-face meetings, the City and HACLA conducted a Resident Fair Housing survey during Winter 2016/Spring 2017 that received more than 6,700 responses from residents of the City and County

of Los Angeles. The Resident Fair Housing Survey was intended for residents to provide input on community and fair housing issues.

The survey was available both on-line and in print and was distributed at every public meeting, through community-based organizations, and at HACLA properties. Various organizations, such as HRC, CD Tech, and Westlake/Pico Union Family Source Center, assisted the City in disseminating and collecting resident surveys, which played a key role in the City reaching its high number of completed surveys.

Surveys were distributed to all HACLA housing management offices (public housing and multi-family program locations). Site management encouraged residents to complete surveys at all resident meetings held through Spring of 2017. At HACLA Section 8 senior housing buildings, senior case managers worked with residents to complete the surveys. The AFH and survey were discussed at two public housing Resident Advisory Council leadership trainings and the Housing Authority Resident Advisory Council meeting to request that the Resident Advisory Councils encourage other residents to complete surveys. Residents scheduled for annual reviews during this period were encouraged to complete a survey as well as any resident who came into a site management office. Interns went door-to-door in some housing communities to encourage completion of the survey. Surveys were made available in the lobby of HACLA's main office and at the two remote Section 8 offices (South and Valley). Section 8 participants and landlords were encouraged to complete surveys during landlord orientation and voucher issuance sessions. The Section 8 monthly electronic newsletter for participant families and landlords included information about the AFH survey. Additionally, HACLA had links to the survey on its public internet as well as internal intranet and an email went out to all HACLA employees to notify them of the survey and to encourage them to participate and to share the online survey link with friends and family. Flyers advertising the survey were placed in all public lobbies of all housing management offices as well as other commonly used public buildings. Through all these efforts, HACLA collected over 1,000 survey responses.

The survey was translated into six foreign languages: Spanish, Korean, Chinese, Tagalog, Russian, and Armenian. A total of 6,757 resident surveys were completed for the entire County. The following reflects the breakdown of responses per language:

English	5,611
Spanish	914
Korean	102
Russian	45
Chinese	65
Armenian	20
Tagalog	0
 TOTAL	 6,757

City of Los Angeles Select Survey Responses

Respondents from the City of Los Angeles accounted for 2,505 surveys (out of the total 6,757). Survey respondents did not answer each of the 59 questions in the survey; therefore, responses for some questions may not add up to the total number of survey responses. Likewise, some questions allowed for more than one response, resulting in some responses adding up to more than the total number of respondents to a question.

Total Respondents

Of the total number of respondents to the questions on gender (2,034), 67.2% reported female (1,366), 30.0% male (610), 0.6% transgender (13), and 0.4% other gender (8).

White respondents accounted for 33.3% (834), Black respondents for 24.6% (616), Latino/a or Hispanic respondents for 20.2% (505), Asian respondents for 6.8% (170), Native American respondents for 4.6% (115), Native Hawaiian or Pacific Islander for 1.0% (26) and those reporting Other Race accounted for 7.7% (194) of the total number of respondents to this question (2,505).

In response to the question on the primary language spoken at home (2,047 total respondents), 78.3% (1,602) reported English and 21.7% (445) reported a Language Other Than English.

Of the total respondents who answered the question on disability (2,049), 63.8% (1,308) reported having no disability, 31.3% (642) reported living with a disability or having a member of their household living with a disability, 4.8% (98) of respondents reported that they did not know whether they or a member of their household was living with a disability.

Total Respondents: 2,505		
By Gender (2,034 respondents)		
Female	1,366	67.2%
Male	610	30.0%
Transgender	13	0.6%
Other Gender	8	0.4%
By Race/Ethnicity (2,505 respondents)		
Native Hawaiian or Pacific Islander	26	1.0%
Native American	115	4.6%
Asian	170	6.8%
Latino/a or Hispanic	505	20.2%
Black	616	24.6%
White	834	33.3%
Other Race	194	7.7%
Primary Language Spoken at Home (2,047 respondents)		
English	1,602	78.3%
Language other than English	445	21.7%
By Disability (2,049 respondents)		
Living with a Disability or Member of Household Living with a Disability	642	31.3%
No Disability	1,308	63.8%
Don't Know	98	4.8%

In the past five years has your rent been paid by a rental assistance program?

Of those that responded to this question (2,136), a minority of respondents (32.0% or 683) reported having their rent paid by a rental assistance program in the past five years, while 60.4% (1,291) responded "No"

to this question. A further 7.6% (162) of respondents reported that they didn't know whether their rent had been paid by a rental assistance program in the past five years.

Total Respondents: 2,136		
No	1,291	60.4%
Yes	683	32.0%
Don't Know	162	7.6%

If you answered Yes to the above question, have you ever had difficulty using that Section 8 voucher?

While 683 respondents answered Yes to the above question, indicating that their rent had been paid by a rental assistance program in the last five years, 1,163 respondents answered the follow-up question for those that had answered "Yes" to the previous question, indicating that some respondents may have been confused by this question. This discrepancy makes the response rates difficult to interpret. With that challenge in mind, 55.7% (648) of respondents reported having no difficulty using their Section 8 voucher, 16.1% (187) of respondents reported "Yes" that they have had difficulty using their Section 8 voucher, and 28.2% (328) of respondents reported that they don't know whether they've had difficulty using their Section 8 voucher. If one uses 683 as the total number of respondents to this question (those that reported that their rent had been paid by a rental assistance program in the past five years), then the percentage of those reporting that they had difficulty using their Section 8 voucher jumps to 27.4%.

Of those who reported having difficulty using their Section 8 voucher, 78.4% (127) were female, 21.0% (34) were male, and 0.6% (1) were transgender. Also, 45.5% (85) were Black, 21.9% (41) were Latino/a or Hispanic, 19.8% (37) were White, 5.3% (10) were Native American, 4.3% (8) were Asian, and 3.2% (6) reported Other Race.

English was the primary language spoken at home by 85.8% (145) respondents, and 14.2% (24) reported a language other than English as their primary language spoken at home.

Those living with a disability or having a member of the household living with a disability accounted for 51.4% (90) of respondents indicating difficulty using their Section 8 voucher, while those with no disability accounted for 40.6% (71), and those who didn't know whether they or a member of their household was living with a disability accounted for 8.0% (14).

Total Respondents: 1,163 (more than answered "Yes" above)		
Yes	187	16.1%
No	648	55.7%
Don't Know	328	28.2%
Of those who answered "Yes" by Gender		
Female	127	78.4%
Male	34	21.0%
Transgender	1	0.6%
Of those who answered "Yes" by Race/Ethnicity		
Native American	10	5.3%

Asian	8	4.3%
Latino/a or Hispanic	41	21.9%
Black	85	45.5%
White	37	19.8%
Other Race	6	3.2%
Of those who answered “Yes” Primary Language Spoken at Home		
English	145	85.8%
Language other than English	24	14.2%
Of those who answered “Yes” by Disability		
Living with a Disability or Member of Household Living with a Disability	90	51.4%
No Disability	71	40.6%
Don’t Know	14	8.0%

Have you been displaced from your housing within the last 10 years?

2,109 survey respondents answered this question. Of those, 75.6% (1,594) reported that they had not been displaced from their housing within the last 10 years, 16.8% (354) reported that they had been displaced from their housing within the last 10 years, and 7.6% (161) reported that they didn’t remember whether they had been displaced from their housing within the last 10 years.

Of those who reported, “Yes,” they had been displaced from their housing within the last 10 years, 71.9% (220) were female, 26.8% (82) were male, 1.0% (3) were transgender, and 0.3% (1) were Other Gender. Also, 29.9% (118) were White, 27.1% (107) were Black, 20.8% (82) were Hispanic, 9.9% (39) were Other Race, 7.3% (29) were Native American, 4.1% (16) were Asian, and 1.0% (4) were Native Hawaiian or Pacific Islander.

Of those who reported, “Yes,” they had been displaced from their housing within the last 10 years, 47.1% (148) reported living with a disability or having a member of their household living with a disability, 44.3% (139) reported no disability, and 8.6% (27) reported that they didn’t know whether they or a member of their household were living with a disability.

Those reporting English as the primary language spoken at home constituted the majority (82.8% or 265) of those having been displaced from their housing within the last 10 years. Those reporting another language than English as the primary language spoken at home accounted for 17.2% (55) of those having been displaced from their housing within the last 10 years.

Total Respondents: 2,109		
Yes	354	16.8%
No	1,594	75.6%
Don’t Remember	161	7.6%
Of those who answered “Yes” by Gender		
Female	220	71.9%
Male	82	26.8%
Transgender	3	1.0%

Other	1	0.3%
Of those who answered “Yes” by Race/Ethnicity		
Native Hawaiian or Pacific Islander	4	1.0%
Native American	29	7.3%
Asian	16	4.1%
Latino/a or Hispanic	82	20.8%
Black	107	27.1%
White	118	29.9%
Other Race	39	9.9%
Of those who answered “Yes” by Disability		
Living with a disability or member of household living with disability	148	47.1%
No Disability	139	44.3%
Don’t Know	27	8.6%
Of those who answered “Yes” Primary Language Spoken at Home		
English	265	82.8%
Other than English	55	17.2%

Do you believe that you have been discriminated against in your housing because of any of the following?

732 survey respondents reported having been discriminated against in their housing either by Gender, Race/Ethnicity, Disability, Source of Income, or other factors.

Of the total, 4.6% (34) reported being discriminated against by gender. The majority of those respondents (71.4% or 20) were female, 17.9% (5) were male, and 10.7% (3) were transgender.

28.1% (206) reported being discriminated against by Race/Ethnicity. Of those, 48.0% (109) were Black, 23.8% (54) were Latino/a or Hispanic, 14.1% (32) were Other Race, 9.7% (22) were Native American, 3.1% (7) were Asian, 1.3% (3) were Native Hawaiian or Pacific Islander.

10.7% (78) of respondents to this question reported being discriminated against by disability. Of those, 74.4% (58) reported living with a disability or having a member of their household living with a disability; 25.6% (20) reported no disability.

19.4% (142) of respondents to this question reported being discriminated against by source of income. Of those, 69.0% (98) reported that they had not received rental assistance in the last five years, and 31.0% (44) reported that they had received rental assistance in the last five years.

Additionally, 7.1% (52) reported discrimination based on pregnancy or having children, 6.4% (47) reported discrimination based on religion, 4.8% (35) reported discrimination based on sexual orientation, 4.8% (35) reported discrimination based on criminal history, and 3.7% (27) by ancestry.

Total Respondents: 732		
By Gender (34 respondents)		
Female	20	71.4%
Male	5	17.9%
Transgender	3	10.7%
By Race/Ethnicity (206 respondents)		
Native Hawaiian or Pacific Islander	3	1.3%
Native American	22	9.7%
Asian	7	3.1%
Latino/a or Hispanic	54	23.8%
Black	109	48.0%
Other Race	32	14.1%
By Disability (78 respondents)		
Living with a Disability or Member of Household Living with a Disability	58	74.4%
No Disability	20	25.6%
By Source of Income (142 respondents)		
Reported receiving rental assistance in past five years	44	31.0%
Didn't report receiving rental assistance in past five years	98	69.0%
By Ancestry		
By Ancestry	27	
By Criminal History		
By Criminal History	35	
By Pregnancy or Having Children		
By Pregnancy or Having Children	52	
By Religion		
By Religion	47	
By sexual Orientation		
By sexual Orientation	35	

Provide a list of organizations consulted during the community participation process.

Housing Rights Center
Alliance of Californians for Community Empowerment (ACCE)
Strategic Actions for a Just Economy (SAJE)
LA VOICE
Inquilinos Unidos
T.R.U.S.T. South LA
Esperanza Community Housing
Public Counsel
Eviction Defense Network
Inner City Law Center
ACT LA

Neighborhood Legal Services of Los Angeles County
Bet Tzedek
SCANPH
Disability Rights California
Mental Health Advocacy Services (MHAS – LA)
Legal Aid Foundation of Los Angeles (LAFLA)
Koreatown Immigrant Workers Association (KIWA)
LA Housing is a Human Rights Collaborative
POWER
LA CAN
Union de Vecinos
Watts/Century Latino Organization (WACELO)
Women, Organizing Resources, Knowledge and Services (WORKS)
Youth Policy Institute
California Apartment Association (CAA)
Building Industry Association Los Angeles/Ventura Chapter
Los Angeles Business Council
Citi Bank
CARECEN
Independent Living Center of Southern California
LA Neighborhood Land Trust
City Planning Commission
McCormack, Baron, Salazar
Alliance for Housing and Healing
Safe Place for Youth (S.P.Y.)
LA LGBT Center
Asian American Advancing Justice
CIT Bank
City of LA's Affordable Housing Commission
The Ralph M. Parsons Foundation
Community Coalition
LA Human Rights
Corporation for Supportive Housing
Liberty Hill Foundation
City of LA's Transgender Advisory Committee
Advancement Project CA
City of LA's Human Relations Committee
HACLA's Commission
Community Health Councils
Move LA
LA Bike Coalition
Los Angeles Homeless Services Authority (LAHSA)
Community Development Technologies (CD Tech)
Los Angeles Unified School District (LAUSD)
United Way of Greater Los Angeles
A Community of Friends

Community Corporation of Santa Monica
Hollywood Community Housing Corporation
TELACU
1736 Family Crisis Center
Haven Hills
Jewish Family Services of LA
Sojourn
Center for the Pacific Asian Family
Rainbow Services Ltd.
Pacoima Beautiful
Koreatown Youth + Community Center (KYCC)
The City Project
Beverly Hills of Greater LA Association of Realtors
Apartment Association of Greater Los Angeles (AAGLA)
LA Chamber of Commerce
Kimball Tirey & St. John LLP
Building Industry Association of Southern California - Los Angeles/Ventura Chapter (BIA-LAV)
Guest House Management
Central City Association (CCA)
Chase Bank
Asian Pacific AIDS Intervention Team (APAIT)
Trans Latino Coalition
Friends Community Center
Deutsch Foundation
California Association of Mortgage Brokers
Communities Actively Living Independent & Free
Comprehensive Housing Information and Referrals for People Living with HIV/AIDS
Dayle McIntosh Center
PAWS/LA
Policy Link
Shelter Partnership
Special Needs Network, Inc.
Barbour & Floyd Medical Associates
Care 1st
DS Los Angeles County of Mental Health
Homeless Health Care Los Angeles
Shared Use Mobility Center
Strength United
The John Stewart Company
Westside Center for Independent Living
Housing Works
LA Family Housing
City of LA Department on Disability
South Central Los Angeles Regional Center
Villa de Vida
All Peoples Community Center

Boys & Girls Club
 Colchester Creek
 Conquest Student Housing
 El Nido Family Center
 Onewest Bank
 Pico Union Housing
 Coalition for Responsible Community Development
 Green Dot Public Schools
 Los Angeles Alliance for a New Economy
 Los Angeles County Office of Education
 Advanced Projects
 Bassett Unified School District
 City of Chino
 Coalition for Economic Survival
 LA County Department of Public Health
 University of Southern California
 Social Model Recovery Systems
 Fame Corporations
 Eastern Los Angeles Regional Center (ELARC)
 Local Initiatives Support Corporation
 Smoke Free Apartments
 Thai Community Development Center
 UCLA Law
 LA City Health Commission
 The Children’s Clinic “Serving Children and their Families”
 Glendale Adventist Medical Center
 AARP
 Community Career Development
 Housing Authority of the County of Los Angeles
 Investing in Place
 LA Black Worker Center
 Los Angeles Hospitality Training Academy
 Roles, Inc.
 Southern California Association of Governments
 Valley Industry and Commerce Association (VICA)
 Women in Non-Traditional Employment Roles
 Alliance for Community Transportation
 California Community Foundation
 TAC-LA
 Jobs to Move America

Phase 2: In-Person Meetings

Stakeholder Meetings

The City engaged in a robust second phase of stakeholder engagement during the AFH 45-day comment period, from mid-August through September 2017. This included a meeting on September 14th with the Fair Housing Collaborative, comprised of 30 members and representing developers, lenders, service providers,

government bodies, foundations, advocates, and members of protected classes. During this meeting, members of the Fair Housing Collaborative reviewed and provided input on the draft Goals and Strategies section of the AFH and to rank the contributing factors. A shared Google Document was used to provide additional comments to the Goals and Strategies section for two weeks following the meeting. In addition to helping shape goals and strategies in the AFH, the Collaborative will continue its work beyond submission of the AFH to ensure that these goals and strategies are included in the Consolidated Planning Process and Public Housing Authority Plan and implemented over the next several years.

Public Hearings

During the comment period, two public hearings were held: one on the evening of September 14, 2017 at the Ronald F. Deaton Civic Auditorium which included a live webcast, and one during the day on September 27, 2017 at the Los Angeles City Council's Housing Commission meeting held at City Hall.

How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

As indicated above, there were a multitude and concurrent efforts to carry out the community participation held during this process, probably the most of any jurisdiction conducting an AFH. As a result of this robust community participation process, hundreds of residents, stakeholders, service providers, affinity groups and government agencies were consulted and their input helped shaped the AFH. This success is due, in part, to a collaboration with ACCE and HRC, who organized numerous meetings with residents and service providers that were extremely well organized and attended. This process highlights the importance of partnering with community based organizations and having their members facilitate meetings to ensure that participants have an open and honest dialogue.

Most of the meetings held were well-attended, however, some of the nine public meetings held early in the process had inconsistent attendance, ranging from five people to approximately ninety people. The meetings with the lowest attendance were in the areas of higher opportunity such as West Los Angeles; the meeting with the highest attendance was in the R/ECAP and predominately Latino area near downtown Los Angeles. One of the reasons for this disparity appears to be that people who were concerned about their own housing issues attended to seek assistance while those in higher income neighborhoods did not find these meetings as pressing, despite the City's significant outreach efforts.

The two public hearings held during the public comment period of the draft AFH were well attended and input from dozens of speakers was incorporated into the AFH Plan.

Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

All comments were accepted and addressed in the final AFH except where noted.

AFFH Rule

- The AFFH rule should be rescinded because it is overreach by the federal government. *Not accepted – constitutional issue.*

AFH Inconsistencies

- Some of the strategies did not have corresponding narratives.

Affordable Housing

- Require set-asides for affordable housing in new land use plans that involve upzoning. *Not accepted – the City has instead committed to allocating city-owned land for affordable housing, particularly in current and emerging high-opportunity areas and reducing barriers that make affordable housing more difficult to build, particularly in high opportunity areas. In addition, there is a commitment to establish a “no net loss” of affordable housing policy to be included in land-use plans, local laws, community plans, and RFPs for funding for affordable housing.*
- There needs to be an increase in affordable housing with direct renter assistance.
- The affordability requirements for city-owned land for affordable housing should be set at 30% of Area Median Income (AMI) or below, to the extent financially feasible.
- Increase the supply of affordable housing and reduce the cost of market rate housing.
- Increase resources for affordable housing construction and preservation.
- Increase the number of affordable housing units that can accommodate families of five or larger. *Not accepted – the City acknowledges the need for large affordable housing units but lacks the necessary resources to create enough of these units to meet the demand. The City is working hard to seek and secure new funding sources to address the myriad of new affordable housing needs including the development of units for large families.*

Criminal Background Checks

- Require HACLA to cease its Community Safety Partnership with the LAPD and searches of public housing tenants as well as provide grievance rights and legal counsel to all public housing tenants. *Not accepted – instead, HACLA will review its partnership with LAPD and searches and conduct an annual review of compliance regarding the use of arrest records in housing decisions, including terminations.*
- Ensure compliance with HUD’s “Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions.”

Data

- Add disaggregated data on Asian and Pacific Islander populations.

Disability and Reasonable Accommodation

- Require HACLA to take a proactive approach to identify issues that might require reasonable accommodation whenever termination of assistance is contemplated.
- Use the term “people with disabilities” rather than “disabled people” or “the disabled.”
- Coordinate with the Continuum of Care and Coordinated Entry System (CES) to ensure that people with disabilities in inaccessible housing have access to accessible housing.
- Ensure access to the CES for people with disabilities who cannot provide detailed personal/medical information.
- Differentiate between accessibility standards in overall accessible unit count.
- Analyze policies to prioritize people with disabilities for accessible units in waiting lists.

- Include Independent Living Centers as a resource in the Fair Housing Enforcement, Outreach Capacity, and Resources section.
- Provide data on the number of publicly subsidized accessible units. *A survey of these units will begin in 2018.*
- Fully fund the handy worker program and implement a landlord incentive program for housing voucher recipients with disabilities. *Not accepted due to limited resources.*

Environmental Issues

- A City lead-based paint ordinance should be passed and existing federal and states laws should be enforced. *Partially accepted - HCIDLA will implement an Enhanced Repair Program and regular enforcement of lead-safe work practices utilizing containment.*
- Adopt smoke-free building policies. *Not accepted –HACLA’s Healthy Homes Initiative in partnership with the Los Angeles County Department of Public Health, has begun to promote its Healthy Homes Initiative by promoting a smoke-free environment. This includes prohibiting smoking inside of its multi-family dwellings while promoting healthy living through smoking cessation programs and other health services.*

Evictions

- “Just Cause” evictions should be removed as a strategy because it places additional requirements on proving that a nuisance exists. *Not accepted because evictions without cause disproportionately displace low-income people of color and people with disabilities.*

Domestic Violence

- Ensure protections for victims of domestic violence so they don’t end up homeless.

Fair Housing Laws

- Train LAPD in fair housing laws and resources.

HACLA

- There should be additional goals and strategies focused on improving the work of HACLA.
- Improve the Section 8 program to incentivize landlords to participate in the program.

Homelessness

- Repeal laws that criminalize sleeping, sitting or standing in public space or limit someone’s ability to sleep in his or her car; prohibit destruction of property belonging to someone experiencing homelessness. *Not accepted – there are pending legal challenges and the results will shape future policies.*

Landlord Issues

- Landlords with empty housing units should be taxed. *Not accepted because landlords already pay property taxes and it would be difficult to prove that vacancies are intentional.*
- The Rent Stabilization Ordinance makes it difficult to evict tenants and makes tenants largely immune from being responsible tenants and good neighbors. *Not accepted because tenant protections preserve affordable housing and the City is working diligently to reach balanced solutions to address the affordable housing crisis.*

LGBT

- Include “gender non-confirming and non-binary” in sections pertaining to Lesbian, Gay, Bisexual, Transgender (LGBT) persons.
- Enforce fair housing protections for transgender persons and gender non-binary people.
- Review and revise shelter and homeless service policies that disproportionately impact the ability of transgender, gender non-confirming and non-binary persons to access safe, decent, and affordable housing.
- Add transgender and gender non-binary competent to housing mobility counselors. *Added “culturally competent.”*
- There were a number of additional comments requesting inclusion of specific “transgender and gender non-confirming and non-binary” language to existing strategies but most strategies do not enumerate specific protected classes.

Mandatory Inclusionary Zoning

- Adopt a mandatory inclusionary zoning policy for both for-sale and rental developments. *Partially accepted – the City is in the process of adopting a mandatory linkage fee and plan to complete an analysis of its impact and the potential for stronger inclusionary housing requirements after two years of implementation.*

Public Housing/Vouchers

- Reduce the reliance of housing choice vouchers and increase the number of public housing units. *Not accepted because reliant on HUD’s PHA budget.*

Rent Control

- Rent control should be abolished because it is not based on tenants’ incomes and leads to low vacancy rates, limited mobility, and deteriorated housing stock. *Not accepted because the abolishment of rent control would lead to a marked decrease affordable housing and an increase in evictions.*

Tenants’ Rights

- Develop a “Right to Counsel” policy. *Partially accepted – the City will explore the feasibility of a “Right to Counsel” and draft an ordinance based on the results of the report.*
- Add language to the proposed City tenant harassment ordinances that prohibits discrimination on the basis of either race or national origin.
- Protect renters from displacement.

Summaries and written transcripts from the focus groups, public meetings, and public hearings are located in Appendix E.

III. Assessment of Past Goals, Actions and Strategies

Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents.

Goals articulated in the most recent Analysis of Impediments in 2012 included:

1. Combat discrimination by expanding the housing choices of persons with disabilities, people with children, and minorities.
2. Create and implement an outreach program to provide fair housing information to both landlords and tenants.
3. Expand access to financing by more strictly enforcing fair lending practices and targeting minority households with lending initiatives.
4. Prevent predatory lending schemes, especially those related to home improvement and targeted towards elderly and minority households.
5. Support the continuation of transit-oriented developments while minimizing the negative displacement effect on lower and moderate-income households and minority households.
6. Reduce discriminatory advertising.

Discuss what progress has been made toward the achievement of fair housing goals in Program Years (PYs) 13 – 16.

Los Angeles did not create a fully updated, HUD approved, Analysis of Impediments in 2012. Instead, the City waited until 2015 for HUD to release new guidance on the Affirmatively Furthering Fair Housing (AFFH) Rule and the replacement of the Analysis of Impediments (AI) with the Assessment of Fair Housing to adhere to an improved rule. Subsequently, the City did not comprehensively implement the draft goals as identified in the 2012 AI, and in its place implemented the following:

- Combat discrimination by expanding the housing choices of persons with disabilities, people with children, and minorities.
- The City remained active in expanding affordable housing and in maintaining existing public housing options. In just the first program year (PY 13-14), the City had granted land-use entitlements for the expansion of the Jordan Downs public housing development from 700 to 1800 affordable and market-rate units. HACLA also acquired thirty-four properties in Watts in single-family detached or duplex configuration. Additionally, on December 2014 the City completed the process of rehabilitating Harbor Village's 400 low-income units.
- In the first 2 years of the 5-year Consolidated Plan (PY 13-14 and PY 14-15), the City had financed the construction of more than 2,000 affordable housing units, far surpassing its goal of constructing 570 such units. There was a significant drop in the number of affordable rental units constructed in PY 15-16, but the progress made in the earlier program years more than compensated for the one-year decline.
- Although the City did not greatly increase the number of accessible housing units that are affordable, it pursued a stricter policy of Americans with Disabilities Act ("ADA") compliance by private developers. It implemented an Accessibility Standards Policy to require developers to submit State Certified Access Specialists (CAS) reports at various stages of planning/construction to confirm that at least 5% of units are accessible to persons with mobility disabilities and an additional 2% are accessible to persons with sensory impairments.

- Over the next 10 years, the City will ensure that at least 4,000 of its affordable housing units meet architectural standards required by the Uniform Federal Accessibility Standards (UFAS) and enforce policies to ensure that those units are inhabited by people who need the specific accessibility features provided.
- HCIDLA has formed an Accessible Housing Unit to, among other things: ensure that all future construction of multi-family housing units overseen by the City fully comply with Section 504 of the Rehabilitation Act, the ADA, the federal Fair Housing Amendments Act, and the California Building Code; ensure that non-discriminatory rental occupancy policies are adopted and implemented by Owners and Property Management Agents for covered housing developments; redesign the City's rental housing website, www.Housing.LACity.org, to provide an Accessible Housing Registry that lists all accessible units and their features and allows individuals with disabilities the opportunity to be notified of vacant units and apply for the units online or through a call center; provide effective communications for applicants, tenants, and the public that includes large print documents, braille, auxiliary aids and services, hearing devices, and other services to ensure that communications with applicants and tenants with disabilities are as effective as communications with people without disabilities; train City staff, owners, and their property managers on federal and state laws relating to nondiscrimination in regards to people with disabilities; and respond to concerns and resolve grievances by people with disabilities in a timely manner.
- In partnership with HCIDLA, Housing Rights Center (HRC) provides client services to Los Angeles residents with potential cases of housing discrimination through the HRC hotline, physical office, workshops and clinics. In PY 13-14, HRC had 8,248 contacts from LA households which included individuals and families. HRC opened 409 cases and gathered sufficient evidence to sustain allegations in 222 cases (54%). The majority of cases involved allegations of mental or physical disability. In PY 14-15, HRC provided services to 21,961 individuals (10,110 households). HRC received 1,036 discrimination complaints of which 431 warranted further investigation to remedy possible legal disputes. Sufficient evidence was gathered to sustain allegations in 247 cases (60%). In PY 15-16, HRC provided services to 1,053 callers of which 380 cases were opened. Of the 380 cases HRC opened, sufficient evidence was gathered to sustain the allegations in 172 cases (45%). The City continued partnering with the HRC to investigate complaints placed through the HRC hotline. In PY 15-16, the majority of intakes conducted by HRC were of persons with physical or mental disabilities.
- In PY 13-14, the City fully implemented the coordinated assessment and access system for homeless families known as the Family Solutions System (FSS). The FSS assists imminently at-risk homeless families with navigating the housing and social service system. FSS has a specific focus on the long-term housing stability of the family. Each Family Solution Center (FSC) provides, at minimum, homeless prevention services, rapid rehousing assistance including financial assistance for security deposits, utility set up, and short term rental and veteran assistance. HACLA continued to provide homeownership assistance to families through its Homeownership Program, which is accessible to Section 8 participants enrolled in the Family Self-Sufficiency Program, along with elderly or disabled households. HCIDLA continued to operate homeownership assistance programs. The Mortgage Credit Certificate program provides a dollar-for-dollar reduction to the homebuyer's potential federal income tax liability, thus increasing the household income available to qualify for a home mortgage program. The Low Income Purchase Assistance Program helps first-time, low-income homebuyers to cover the down payment, closing, and acquisition costs.

- During each year the Consolidated Plan was in action, the City surpassed its target number of households assisted with direct financial homebuyer assistance.

Create and implement an outreach program to provide fair housing information to both landlords and tenants.

- HACLA has persistently worked to increase Section 8 acceptance by landlords. In pursuit of this goal, it has contacted landlord associations, improved customer service for landlords, and conducted landlord fairs. The Rent Stabilization Ordinance (RSO) outreach campaign was created to help tenants and landlords better understand and access City resources to help them stay in their homes in a tight housing market where rents are rapidly rising. The campaign was featured in communities vulnerable to displacement and leveraged highly visible assets including transit shelters, bus interior/exterior, City facilities, and work source centers. Furthermore, RSO tenants and landlords were informed of their rights and responsibilities through educational pocket guidebooks and direct outreach through door hangers and other tools that take the campaign to them.
- HCIDLA, in partnership with HRC, regularly convenes free Landlord-Tenant Informational Workshops throughout the City to educate attendees about various topics related to Los Angeles' RSO; some examples of workshops are Landlord Responsibilities under the RSO, Evictions & Buyout Notification Program – “Cash for Keys,” Rent Increases Allowed in RSO Rental Units, and numerous others. In addition, the RSO Division of HCIDLA has drop-in sessions on the first Tuesday of every month where owners can receive free assistance with calculating the annual rent increase for their units, capital improvement applications, and other RSO related programs. - <http://hcidla.lacity.org/RSO-Overview>.
- HCIDLA's Accessible Housing Unit has begun training City staff, owners, and their property managers on federal and state laws relating to nondiscrimination in regard to people with disabilities and has started the process of ensuring that non-discriminatory rental occupancy policies are adopted and implemented by Owners and Property Management Agents for covered housing developments.
- As part of its contract with HCIDLA, HRC provides educational seminars, workshops, and presentations on fair housing. Additionally, HRC provides multilingual property owner, manager, and realtor training sessions. Every month, HRC sponsors Fair Housing Rights clinics in various HCIDLA field offices throughout the City.

Expand access to financing by more strictly enforcing fair lending practices and targeting minority households with lending initiatives.

- The City continued investing some of its funding in the Homeownership Program, which was implemented by HACLA to assist qualified Section 8 participants to use their vouchers to purchase a home.
- The City continued to support the Low Income Purchase Assistance Program, which helps first-time, low-income homebuyers purchase homes by providing loans to cover the down payment, acquisition, and closing costs. Program applicants must attend an 8-hour Homebuyer Education Class, contribute a minimum of 1% of the home purchase price from their own funds for the down payment, and must occupy the home as their principal residence.

- In 2013, the City of Los Angeles sued Wells Fargo, Citigroup and Bank of America for discriminatory lending, saying that the banks violated the Fair Housing Act and were to blame for a wave of foreclosures in minority communities that caused an estimated loss of more than \$78 billion in home value. Los Angeles withdrew its lawsuit against Citigroup in October 2015. In May 2017, the U.S. Court of Appeals for the Ninth Circuit ruled against the City in the lawsuits involving Wells Fargo and Bank of America.

Prevent predatory lending schemes, especially those related to home improvement and targeted towards elderly and minority households.

- Through its Handyworker Program, HCIDLA provided assistance to low-income, elderly or disabled homeowners to rehabilitate their homes. From April 2013 through March 2014, 470 homeowners and 124 renters received assistance. A further 334 homeowners and 78 renters received assistance from April 2014 through March 2015. Additionally, 130 homeowners and 5 renters received assistance from April 2015 through March 2016. Low-income minority homeowners are less vulnerable to predatory scams when they are able to finance home repairs through this program.

Support the continuation of transit-oriented developments while minimizing the negative displacement effect on lower and moderate-income households and minority households.

- LA County voters passed Measure R in 2008, a transit initiative that includes a \$40 billion investment to add public transit stations to the City's existing stock of 71 stations. Because areas of opportunity in LA are overwhelmingly found in neighborhoods through which public transit traverses, the implementation of Measure R is expected to improve chances for opportunity in low- and moderate-income communities. Measure M approved by voters in November 2016, will invest an additional \$120 billion over the next 40 years to build a 21st century public transit system. This initiative has the potential to fundamentally transform mobility for low- and moderate-income communities but could also lead to increased gentrification and displacement of low-income residents in areas near transit-oriented development where affordable housing is not preserved or maintained.
- The City's former Mayor, Antonio Villaraigosa, created the Transit Corridors Cabinet ("TCC") as a central clearinghouse for transit-related policy across various departments to enhance transit orientation within the City, a final white paper, "***Developing and Implementing the City of Los Angeles' Transit Corridors Strategy***" outlining several tactics and recommendations for the City's implementation was a key outcome of the TCC. Several aspects of this body of work transitioned into the Great Streets Initiative under Mayor Eric Garcetti. More recently, on March 19, 2017, Mayor Eric Garcetti issued Executive Directive No. 19 to improve the planning process and help LA build transportation infrastructure and affordable housing approved by voters through Measure M and Proposition HHH. Among other things, the directive fosters collaboration among City Departments, and with the Los Angeles County Metropolitan Transportation Authority to invest the \$860 million a year generated by measure M in transportation and affordable housing projects as quickly and efficiently as possible. The directive is part of a broader series of policies, which include releasing a Transit Oriented Communities (TOC) program for consideration by the City Planning Commission and the implementation of the Mayor's Transportation Infrastructure Steering Committee. The TOC program will expand development incentives for mixed-income

housing projects located within one-half mile of major transit stops. The Mayor's Transportation Infrastructure Steering Committee, for example, will review and make decisions on transportation infrastructure projects.

- Furthermore, the City has been working to align its transportation funding through various measures such as Transit Oriented Development (TOD) incentives in its Notice of Funding Availability (NOFA) for the Managed Pipeline, executing the first Los Angeles County Metropolitan Transportation Authority (LA METRO) Memorandum of Understanding (MOU) to help implement LA METRO's affordable housing policies and goals, the first Five-Year Transit-Oriented Consolidated Plan, and the alignment of investments along with transit, and the City's Family Source Center's (FSC) recent Request for Proposals (RFP) that considered access to transportation and FSC.

Reduce discriminatory advertising.

- HCIDLA required housing developments to develop affirmative marketing plans with the aim of expanding housing choices of persons who are not likely to apply without special outreach.
- HCIDLA partnered with Los Angeles County to provide an online directory, www.housing.lacity.org, and telephone hotlines to owners or property managers to post their housing listings for free.

Discuss how successful in achieving past goals, and/or how it has fallen short of achieving those goals (including potentially harmful unintended consequences).

Among the City's greatest successes was the construction and rehabilitation of more affordable housing units than it had planned for in its five-year strategic plan for the 2013-2017 Consolidated Plan. In its strategic plan, the City set a goal of creating 570 affordable rental units. For PY 13-14, the City expected to assist the construction of 125 rental housing units using Community Development Block Grant (CDBG), Housing Opportunities for Persons with AIDS (HOPWA), and HOME Investment Partnerships Program (HOME) funding but actually assisted the construction of 1,141 rental housing units. In that same year, the City did not expect to assist the rehabilitation of any rental housing units but actually assisted the rehabilitation of 200 rental housing units. In PY 14-15, the City expected to create 140 affordable rental units but actually created 1089 units. However, it only created 235 affordable rental units in PY 15-16 despite planning to create 305 units. The City also achieved its goal of economically stabilizing families through job creation or retention. Additionally, the Transit-Oriented Consolidated Plan 2013-2017 was designed to locate all public investments near transit and increase affordable housing in and around transit (light rail stations and Bus Rapid Transit stops).

Despite these successes, several of the City's policies and approaches to achieving its goals stymied its progress or had unintended adverse consequences. In the area of affordable housing, the City created the Affordable Housing Trust Fund (AHTF) in 2001, a program designed to manage a pipeline to produce affordable rental housing for low- and very low-income households by making long-term loans for new construction or for the rehabilitation of existing residential structures through an open competitive Call For Projects process. One to two funding rounds are held each calendar year, with projects competing for Trust Funds that are used to leverage Low Income Housing Tax Credits (LIHTC) or funding from other State or Federal housing programs. Currently, the Trust Fund is comprised of various funding sources, including

but not limited to Federal HOME funds, assets and funds of former Community Redevelopment Agency (CRA), City general funds, and McKinney-Vento Act Savings funds.

AHTF requires developers to leverage 4% Low Income Housing Tax Credits (LIHTC) managed by the State of California in conjunction with tax-exempt bonds for Senior, Family and Permanent Supportive Housing projects. AHTF funds are then matched and leveraged against other resources on more than a \$4 to \$1 basis. Likewise, the City's strategy of focusing revitalization efforts on transit corridors was insufficient to guarantee that lower-income households would not be displaced from such potentially high-opportunity neighborhoods as demographics in these neighborhoods have continued to shift.

Discuss any additional policies, actions, or steps that the program participant could take to achieve past goals, or mitigate the problems it has experienced.

The City was hindered by a lack or reduction of funding in various program areas such as decreased allocations of CDBG and HOME funds from Congress since its last Analysis of Impediments. In some instances, it was able to achieve its goals despite this setback, as was the case with the construction of new affordable units. However, the City was unable to assist its target number of local businesses and therefore had limited success in revitalizing neighborhoods.

In the future, the City could focus on specific geographic areas or neighborhoods that demonstrate the highest level of need. The City can also continue its efforts to prevent or alleviate homelessness by working to permanently house the homeless rather than provide more beds in shelters. Additional efforts the City has taken to address its homeless strategy plan have contributed to incremental progress. In PY 15-16, the Los Angeles Continuum of Care (CoC) worked together to expand grassroots, community coordination efforts to end chronic homelessness for individuals through the implementation of a Coordinated Entry System (CES) throughout LA County by Service Planning Areas (SPAs). In an effort to end chronic homelessness, CES's goal systematically assesses the needs of person(s) experiencing homelessness and arranges a level of intervention that best fits their needs. CES ensures households with the most severe needs and levels of vulnerability are prioritized for housing and homeless assistance. The CES was expanded to include families and youth.

Since the City opted to respond to a final AFH rule in 2015, action steps for the 2012 Analysis of Impediments were not needed. The advent of HUD's Affirmatively Furthering Fair Housing rule and resulting Assessment of Fair Housing will ensure that fair housing goals and strategies are interwoven into all plans and policies moving forward.

Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Program participants were much more fully engaged during the drafting of this AFH than in the past several AI processes. As a result, the goals in this document are bolder, more comprehensive, more specific, and better reflective of the robust community participation process. These goals also contain measurable metrics and timelines that will enable the program participant to track the City and HACLA's progress and accountability for meeting these goals over the next five years.

IV. Fair Housing Analysis

A. Demographic Summary

Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

Please note that the terms African-American and Black are used interchangeably in this document. Also, White and Non-Hispanic White are used interchangeably in this document.

Demographic Summary: According to U.S. Census data, the demographics of the City of Los Angeles have undergone significant change since 1990 to 2010. Both the White and Black populations decreased between 1990 and 2010 (in numbers and percentage), from 1,293,927 (37.2% of the total population) to 1,083,347 (28.6% of the total population) for White residents and from 453,181 (13.0% of the total population) to 372,536 (9.8% of the total population) for Black residents. Meanwhile, the Hispanic and Asian or Pacific Island populations both grew notably during the same time period.

In 2017, the population of the City of Los Angeles surpassed four million residents.¹ While the ethnic and racial diversity of residents continues to grow, increasing gentrification and housing affordability issues disproportionately affecting Black and Hispanic residents continue to challenge the City.

Overall Population – Demographic Trends

- In the City of Los Angeles, the overall population has increased since 1990.
- The overall population in 1990 was 3,478,347, signifying a population boom from the 1980s fueled by rising Hispanic and Asian populations, both through immigration and births.² By 1991, Hispanics were the plurality group in LA at approximately 40% of the total population.
- In 2000, the overall population was 3,690,379, an increase of 212,032 or 6.1% since 1990. While still an increase, the rate of growth in the 1990s slowed compared to the rate of growth in the 1980s due in part to a severe recession, civil unrest, and the Northridge earthquake.³
- In 2010, the overall population was 3,778,861, a modest increase over 2000 of 88,482 or 2.4%. The diversity of the population slightly increased. At the same time, gentrification began to take hold in Downtown and other areas of the city.⁴
- In 2017, the population is estimated at 4,041,707⁵ an increase of 262,846 or approximately 7% in seven years, indicating an increasing population growth rate. While the City and region's populations have continued to increase, lack of housing and, in particular, lack of affordable housing are becoming bigger issues. And though LA is adding more and denser housing, experts say it is not keeping pace with demand.⁶
- The overall population of the region⁷ was 11,266,128 in 1990.

¹ State of California, Department of Finance, E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2016 and 2017. Sacramento, California, May 2017.

² <http://www.latimes.com/local/lanow/la-me-historic-population-20170501-htmstory.html>

³ <http://www.latimes.com/local/lanow/la-me-historic-population-20170501-htmstory.html>

⁴ <http://www.latimes.com/local/lanow/la-me-historic-population-20170501-htmstory.html>

⁵ State of California, Department of Finance, E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2016 and 2017. Sacramento, California, May 2017.

⁶ <http://www.latimes.com/local/lanow/la-me-historic-population-20170501-htmstory.html>

⁷ Los Angeles Metropolitan Area (aka Long Angeles-Long Beach-Anaheim); combination of Los Angeles County and Orange County data.

- In 2000, the population of the region increased by 1,099,216 people to 12,365,344, an increase of 9.8%--a larger percentage increase in the region than in the City of Los Angeles itself.
- In 2010, the population of the region increased by 463,493 to 12,828,837 or 3.7%--a smaller rate of growth than the prior ten years.
- In 2017, the estimated population of the region is 13,435,302, an increase of 606,465 or 4.7%.⁸

City of Los Angeles (1990-2000)

- From 1990 to 2000, the number and percentage of non-Hispanic White (White) residents decreased from 1,293,927 (37.2% of the total population) to 1,095,428 (29.7% of the total population), a decrease of 198,499 or 15.3%.
- From 1990 to 2000, the number and percentage of Hispanic residents increased from 1,389,413 (39.9% of the total population) to 1,718,263 (46.6% of the total population), an increase of 328,850 or 23.7%
- The Black population decreased from 453,181 (13.0% of the total population) to 422,315 (11.4% of the total population), a decrease of 30,866 or 6.8%.
- The Asian or Pacific Islander population increased from 320,157 (9.2% of the total population) to 397,197 (10.8% of the total population), an increase of 77,040 or 24.1%.
- The Native American population increased from 9,254 (0.3% of the total population) to 16,045 (0.4% of the total population), an increase of 6,791 or 74.4%. While the percentage increase is significant, the number of new Native American residents is still very small to that of other racial and ethnic groups.

City of Los Angeles (2000-2010)

- From 2000 to 2010, the number and percentage of the White population decreased again from 1,095,428 (29.7% of the total population) to 1,083,347 (28.6% of the total population), a decrease of 12,081 or 1.1%.
- The Hispanic population grew again from 2000 to 2010 but more modestly than in the previous decade. In 2000, the Hispanic population was 1,718,263 (46.6% of the total population), and, by 2010, the Hispanic population was 1,838,233 (48.5% of the total population), an increase of 119,970 or 7.0%.
- The Black population continued to decrease, with 422,315 residents in 2000 (11.4% of the total population) and 372,536 residents (9.8% of the total population) in 2010, a decrease of 49,779 or 11.8%.
- The Asian or Pacific Islander population grew more rapidly than any other group, starting with 397,197 (10.8% of the total population) in 2000 and closing out the decade with 466,041 (12.3% of the total population), an increase of 68,844 or 16.3%.
- The Native American population decreased from 16,045 (0.43% of the total population) to 13,070 (0.35% of the total population), a decrease of 2,975 or 18.6%.

City of Los Angeles (2010-2017)

- In 2017, the population of the City of Los Angeles passed the four million mark.
- The most up-to-date demographic data for the City of Los Angeles that disaggregates the population by race and ethnicity is from the 2015 American Community Survey 1-Year Estimates.

⁸ State of California, Department of Finance, *E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2016 and 2017*. Sacramento, California, May 2017.

- Between 2010 and 2015, the White population increased from 1,083,347 (28.6% of the population) to 1,119,405 (28.2% of the population), an increase of 36,058 or 3.3%. This modest increase in the White population represents the reversal of a long-term trend but was not substantial enough to prevent the percentage of White Angelenos from decreasing.
- The Hispanic population registered a modest increase from 1,838,233 (48.5% of the population) to 1,936,732, a jump of 98,499 or 5.4%
- The Black population continued its fall, dropping from 372,536 (9.8% of the total population) to 355,984 (9.0% of the total population), a decrease of 16,552 or 4.4%
- The Asian or Pacific Islander population decreased slightly from 466,041 (12.3% of the total population) to 457,556 (11.5% of the total population), a decrease of 8,485 or 1.8%
- The Native American population plummeted from 13,070 (0.4% of the total population) to 6,061 (0.2% of the total population), a decrease of 7,009 or 53.6%.

Los Angeles-Long Beach-Anaheim, CA MSA (1990-2000)

- Demographic changes in the region from 1990 to 2000 followed similar patterns to those in the City of Los Angeles with the number and percentage of White residents decreasing, the percentage of Black residents decreasing (though increasing slightly in real numbers), and the Hispanic, Asian or Pacific Islander, and Native American populations showing significant increases in both number and percentage.
- The White population of the metropolitan region decreased from 5,166,768 (45.9% of the total population) to 4,417,595 (35.7% of the population), a drop of 749,173 or 14.5%.
- The Hispanic population grew from 3,914,001 (34.7% of the total population) to 5,117,049 (41.4% of the total population), a significant increase of 1,203,048 or 30.7%.
- The Black population grew from 971,105 (8.6% of the total population) to 1,001,103 (8.1% of the total population), an increase of 29,998 or 3.1%. However, it is notable that, despite the increase in numbers, the percentage of Black residents decreased during this time.
- The Asian or Pacific Islander population jumped significantly from 1,146,691 (10.2% of the total population) to 1,651,006 (13.4% of the total population), an increase of 504,315 or 44%.
- The Native American population also increased from 36,210 (0.3% of the total population) to 66,029 (0.5% of the total population), a jump of 29,819 or 82.3%. Despite the significant increase in real numbers, like the City of Los Angeles, Native Americans remained a small proportion of the total population in the metropolitan area.

Los Angeles-Long Beach-Anaheim, CA MSA (2000-2010)

- In the metropolitan area, all races and ethnicities exhibited the same trends toward increasing or decreasing populations as seen in the City of Los Angeles. However, some of the rates of growth or decline differed.
- The White population decreased at a faster rate in the metropolitan area than in the City of Los Angeles. The White population dropped from 4,417,494 (35.7% of the total population) to 4,056,820 (31.6% of the total population), a decrease of 360,674 or 8.2% (compared to a decrease of 1.1% in the City of Los Angeles).
- The Hispanic population increased at a faster rate in the metropolitan area than in the City of Los Angeles. The Hispanic population grew from 5,117,049 (41.4% of the total population) to 5,700,862 (44.4% of the total population), an increase of 583,813 or 11.4% (compared to 7.0% in the City of Los Angeles).

- The Black population decreased at a slower rate in the metropolitan area than in the City of Los Angeles. The Black population dropped from 1,001,103 (8.1% of the total population) to 932,431 (7.3% of the total population), a decrease of 68,672 or 6.9% (compared to 11.8% in the City of Los Angeles).
- The Asian or Pacific Islander population increased at a faster rate in the metropolitan area than in the City of Los Angeles. The Asian or Pacific Islander population increased from 1,651,006 (13.4% of the total population) to 2,046,118 (16.0% of the population), an increase of 395,112 or 24.0% (compared to 16.3% in the City of Los Angeles).
- The Native American population decreased at a similar rate in the metropolitan area as compared to the City of Los Angeles. The Native American population decreased from 66,029 (0.5% of the total population) to 54,362 (0.4% of the total population), a drop of 11,667 or 17.7% (compared to 18.6% in the City of Los Angeles).

National Origin – Demographic Trends

City of Los Angeles

- The number and proportion of foreign born residents in the City of Los Angeles remained relatively steady between 1990 and 2010.
- There was a moderate increase in foreign born residents from 1990 to 2000, both in real numbers and in the proportion of the total population. In 1990, foreign born residents numbered 1,335,239 (38.4% of the total population), and, in 2000, foreign born residents numbered 1,511,758 (41.0% of the total population), an increase of 176,519 or 13.2%.
- From 2000 to 2010, there was a minor decrease in foreign-born residents from 1,511,758 (41.0% of the total population) to 1,494,195 (39.5% of the total population), a drop of 17,563 or 1.2%.
- From the 2010 Census to the 2009-2013 American Community Survey 5-Year Estimates, the foreign-born population decreased slightly from 1,494,195 (39.5% of the total population) to 1,483,823 (39.2% of the total population), a decline of 10,372 or less than 1%.
- As of 2010, the most recent year for which this data exists, the top three countries of origin for foreign-born residents are:
 - Mexico: 545,953
 - El Salvador: 166,234
 - Guatemala: 115,410

Los Angeles-Long Beach-Anaheim, CA MSA

- The proportion of foreign-born residents has been consistently higher in the City of Los Angeles than in the metropolitan area throughout the entire time period from 1990 to the 2009-2013 American Community Survey 5-Year Estimates.
- The number and proportion of foreign-born residents increased from 3,469,567 (30.8% of total population) in 1990 to 4,299,323 (34.7% of the total population) in 2000, a jump of 829,756 or 24.0%.
- The number (though not the proportion) of foreign-born residents grew slightly again from 2000 to 2010, from 4,299,323 (34.7% of the total population) to 4,380,850 (34.2% of the total population), an increase of 81,527 or 1.9%.
- From 2010 to the 2009-2013 American Community Survey 5-Year Estimates, the foreign-born population remained relatively steady with a slight increase of 20,060 (less than 0.5%) from 4,380,850 (34.2% of the total population) to 4,400,910 (34.3% of the total population).

- As of 2010, the most recent year for which this data exists, two of the top three countries of origin for foreign-born residents are the same in both the City of Los Angeles and the metropolitan area. However, the Philippines replaces Guatemala as a top three country of origin in the metropolitan region.
 - Mexico: 1,735,902
 - Philippines: 288,529
 - El Salvador: 279,381

Limited English Proficiency – Demographic Trends

City of Los Angeles

- From 1990 to 2009-2013 American Community Survey 5-Year Estimates, the percentage of Limited English Proficiency (LEP) residents remained nearly the same, with LEP residents making up 27.2% of the total population in 1990 and 27.5% of the total population as of the 2009-2013 American Community Survey 5-Year Estimates.
- From 1990 to 2000, the number and proportion of LEP residents increased moderately from 946,493 (27.2% of the total population) to 1,112,800 (30.2% of the total population), a jump of 166,307 or 17.6%.
- From 2000 to 2010, both the number and percentage of LEP residents decreased from 1,112,800 (30.2% of the total population) to 1,055,492 (27.9% of the total population), a decline of 57,308 or 5.1%.
- The number and percentage of LEP residents decreased slightly again from 2010 to the 2009-2013 American Community Survey 5-Year Estimates from 1,055,492 (27.9% of the total population) to 1,041,748 (27.5% of the total population), a decline of 13,744 or 1.3%.
- As of 2010, the most recent year for which this data exists, the three main languages spoken by LEP residents in the City of Los Angeles are:
 - Spanish: 774,813
 - Korean: 61,723
 - Armenian: 32,755

Los Angeles-Long Beach-Anaheim, CA MSA

- Compared to the City of Los Angeles, the metropolitan area has had a slightly lower (though still sizeable) percentage of LEP residents from 1990 to 2009-2013 American Community Survey 5-Year Estimates.
- The percentage of LEP residents in the metropolitan area has remained relatively constant, ranging from 21.6% at the lowest (in 1990) to 25.3% at the highest (in 2000).
- There was a significant increase in LEP residents from 2,430,630 (21.6% of the total population) in 1990 to 3,132,663 (25.3% of the total population) in 2000, a surge of 702,033 or 28.9%.
- From 2000 to 2010, there was a modest decrease in the number and percentage of LEP residents from 3,132,663 (25.3% of the total population) to 3,053,077 (23.8% of the total population); a decline of 79,586 or 2.5%.
- The number and percentage of LEP residents continued to decline slightly from 2010 to 2009-2013 American Community Survey 5-Year Estimates, dropping from 3,053,077 (23.8% of the total population) to 3,020,453 (23.5%), a decrease of 32,624 of 1.0%.
- Like in the City of Los Angeles, Spanish was the number one language spoken by LEP residents in the metropolitan area as of 2010, the most recent year for which this data exists. However,

Korean moved from the number two to the number three most common language, with Chinese as the second most common language spoken by LEP residents in the metropolitan area (Armenian was bumped to the fifth most common language). The three main languages spoken by LEP people in the metropolitan area are:

- Spanish: 2,033,088
- Chinese: 239,576
- Korean: 156,343

Sex – Demographic Trends

City of Los Angeles

- In 1990, the male population was slightly higher than the female population, with 1,745,023 (50.17% of the total population) and 1,733,324 (49.83%) respectively.
- Since 1990, the female population has maintained a slight, but consistent advantage over the male population.

<u>Sex</u>	<u>1990</u>	<u>2000</u>	<u>2010</u>
Male	1,745,023 (50.17%)	1,834,935 (49.72%)	1,882,020 (49.80%)
Female	1,733,324 (49.83%)	1,855,444 (50.28%)	1,896,841 (50.20%)

Los Angeles-Long Beach-Anaheim, CA MSA

- In the metropolitan area, females have constituted a slight majority over males from 1990 through 2010.

<u>Sex</u>	<u>1990</u>	<u>2000</u>	<u>2010</u>
Male	5,626,077 (49.94%)	6,107,286 (49.39%)	6,328,434 (49.33%)
Female	5,640,051 (50.06%)	6,258,058 (50.61%)	6,500,403 (50.67%)

Age – Demographic Trends

City of Los Angeles (1990-2000)

- There was a moderate increase in the number and percentage of residents under 18 during this period, from 859,129 (24.7% of the total population) to 1,003,781 (27.2% of the total population), a bump of 144,652 and 16.8%.
- There as modest growth in the number (though not the percentage) of residents age 18-64 from 2,273,660 (65.4% of the total population) to 2,330,286 (63.1% of the total population), an increase of 56,626 or 2.5%.
- Despite the slight decrease in percentage of the total population, residents age 18-64 remained the clear majority during this period.
- There was also an increase in number (though not in percentage) of residents age 65 or older from 345,558 (9.9% of the total population) to 356,313 (9.7% of the total population), a bump of 10,755 or 3.1%.

City of Los Angeles (2000-2010)

- There was a distinct decrease in the number and percentage of residents under 18 during this period, from 1,003,781 (27.2% of the total population) to 871,706 (23.1% of the total population), a drop of 132,075 or 13.2%
- At the same time, there was an increase in number and percent for both residents aged 18-64 and residents age 65 or older.

- Residents age 18-64 increased from 2,330,286 (63.1% of the total population) in 2000 to 2,512,244 (66.5% of the total population) in 2010, a jump of 181,958 or 7.8%.
- Residents aged 65 or older increased from 356,313 (9.7% of the total population) to 394,911 (10.5% of the total population), a jump of 38,598 or 10.8%.

Los Angeles-Long Beach-Anaheim, CA MSA

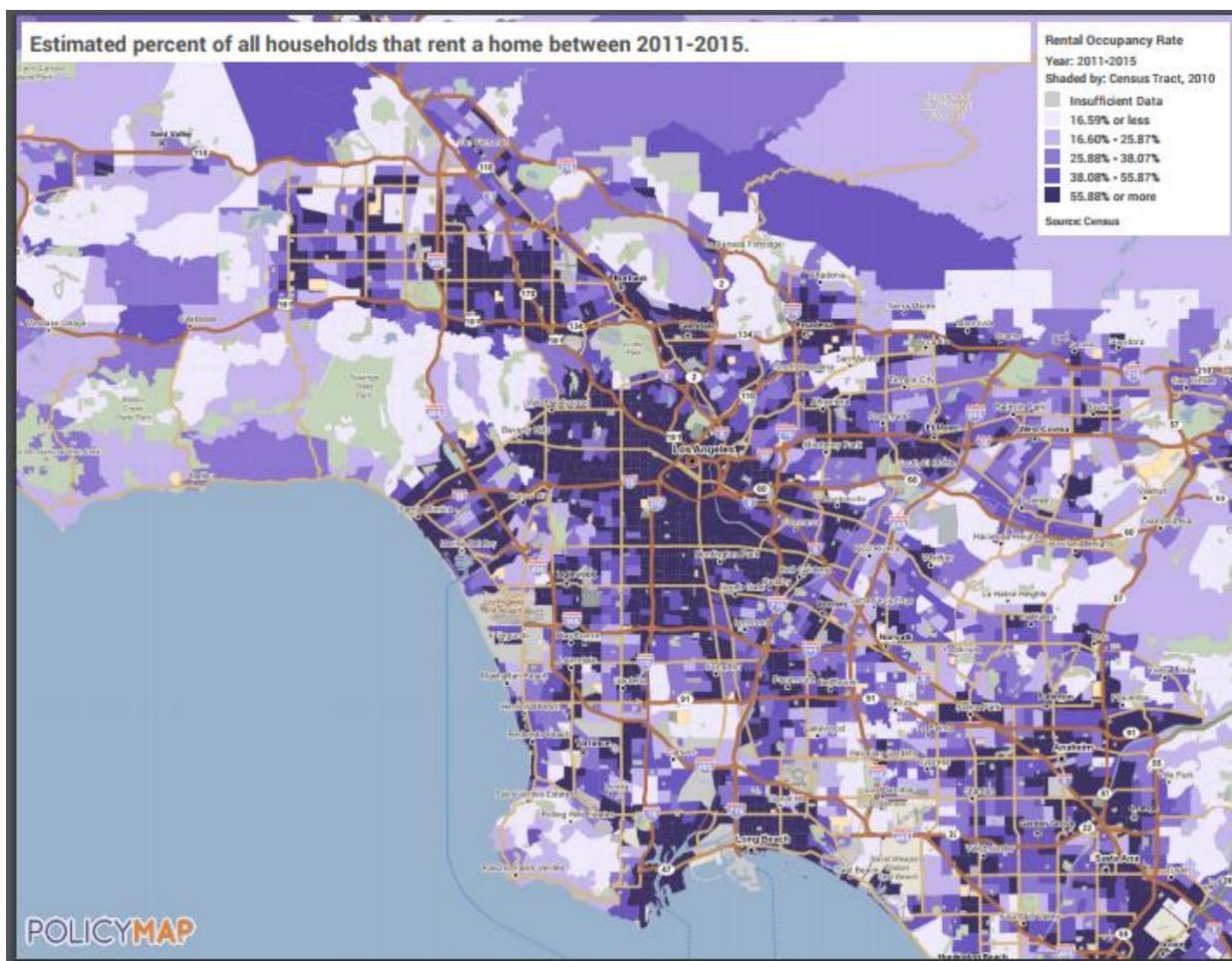
- Like the City of Los Angeles, the number and percentage of residents in the metropolitan area age 18 and under grew from 1990 to 2000 and then decreased from 2000 to 2010.
 - 1990: 2,911,031 (25.8%)
 - 2000: 3,518,245 (28.5%)
 - 2010: 3,138,867 (24.5%)
- Similar to the City of Los Angeles, residents age 18-64 throughout the metropolitan area remained the clear majority from 1990 through 2010 (though the percentage dipped in 2000 before recovering by 2010).
 - 1990: 7,780,517 (64.6% of the total population)
 - 2000: 7,641,369 (61.8% of the total population)
 - 2010: 8,274,594 (64.5% of the total population)
- Unlike the City of Los Angeles, residents in the metropolitan area age 65 or older sustained modest increases in number and percentage throughout the period from 1990 to 2010.
 - 1990: 1,074,580 (9.5%)
 - 2000: 1,205,730 (9.8%)
 - 2010: 1,415,376 (11.0%)

Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

In the City of Los Angeles, renters are concentrated in Central, East, and South LA, with additional pockets of renters in the Wilmington neighborhood in the Harbor area and in Van Nuys, Panorama City, Canoga Park, Sylmar, Tujunga, Northridge, and Woodland Hills in the San Fernando Valley. These pockets of concentration are reflective of varying local conditions, including, concentrated poverty, high density housing, and the presence of colleges and universities. Homeowners are concentrated in Encino, Tarzana, Hidden Hills, Bel Air, and Pacific Palisades. There are also less intense concentrations of homeowners in Northeast Los Angeles and in the western portion of San Pedro in the Harbor Area.

Outside of the City of Los Angeles, renters in the region are concentrated in Long Beach, Inglewood, the Gateway Cities, Santa Ana, and parts of Pasadena. Homeowners are concentrated on the Palos Verdes peninsula, in beach cities and hillside communities in Orange County, and in parts of the San Gabriel Valley.

HUD-provided data did not reflect changes in these patterns over time.



B. General Issues

i. Segregation/Integration

LA is one of the most racially and ethnically diverse cities in the United States. No single racial or ethnic group comprises a majority of the population of LA City or LA County and a majority of the City's residents are people of color. By 2020, it is anticipated that a majority of LA County's population will be Hispanic.⁹ Despite the City's overall diversity, segregation of different racial and ethnic groups persists in many neighborhoods. The following provides a detailed analysis of segregation and integration patterns and trends at the regional, City, and neighborhood levels.

⁹ California Department of Finance, Demographic Research Unit, February 2017, http://www.dof.ca.gov/Forecasting/Demographics/Projections/documents/P2_Race_Ethnicity.xlsx.

Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

Dissimilarity Index

	Value	Level of Segregation
Dissimilarity Index Value (0-100)	0-40	Low Segregation
	41-54	Moderate Segregation
	55-100	High Segregation

Table 1 Dissimilarity Index Values by Race and Ethnicity for Los Angeles and Los Angeles Metropolitan Area

	Los Angeles, CA			Los Angeles-Long Beach-Anaheim, CA Region		
	1990 Trend	2000 Trend	2010 Trend	1990 Trend	2000 Trend	2010 Trend
Racial/Ethnic Dissimilarity Index						
Non-White/White	61.72	60.17	58.53	55.32	55.50	54.64
Black/White	78.24	71.42	66.85	72.75	68.12	65.22
Hispanic/White	64.13	65.46	65.20	60.12	62.44	62.15
Asian or Pacific Islander/White	47.08	44.87	42.41	43.46	46.02	45.77

Source: HUD AFFH Tool Table 3- Racial/Ethnic Dissimilarity Trends

LA has significant levels of segregation. One commonly used metric for segregation is the Dissimilarity Index. The Dissimilarity Index measures the percentage of a certain group's population that would have to move to a different census tract in order to be evenly distributed within a City or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the extent of the segregation. For example, if a City's Black/White Dissimilarity Index was 65, then 65% of Black residents would need to move to another neighborhood in order for Blacks and Whites to be evenly distributed across all neighborhoods in the city.

In LA, the Non-White/White Dissimilarity Index indicates that segregation for Non-White/White individuals is high but is on the lower range of what is considered a high level. Hispanics comprise the largest ethnic group in the City and experience high levels of segregation. Black residents experience the highest levels of segregation of any group. Asian Americans and Pacific Islanders experience the lowest levels of segregation of any non-White group with an index value that is at the lower range of what is considered moderate segregation.

Non-White/White segregation is slightly lower in the region as a whole than in LA City. The Black/White Dissimilarity Index as well as the Hispanic/White Dissimilarity Index is lower in the region than in the City but still indicates high levels of segregation. The Asian or Pacific Islander/White Dissimilarity Index value in the region signifies moderate levels of segregation and is actually higher than the Asian or Pacific Islander/White Dissimilarity Index than in LA City.

In addition to the Dissimilarity Index, social scientists also use the isolation and exposure indices to measure segregation. These indices, when taken together, capture the neighborhood demographics experienced, on

average, by members of a particular racial or ethnic groups within a City or metropolitan area. The Isolation Index measures the extent to which minority members are exposed only to one another. Values for the Isolation Index range from 0 to 100. The Exposure Index is a group's exposure to all racial groups. Values for the Exposure Index also range from 0 to 100. A larger value means that the average group member lives in a census tract with a higher percentage of people from other group.

Table 2 Isolation Index Values by Race and Ethnicity in Los Angeles

Racial or Ethnic Group	Los Angeles, CA			
	1980	1990	2000	2010
White	72.4	64.8	57.2	54.9
Hispanic	51.4	58.8	63.8	65.4
Asian American	15.7	18.9	21.5	23.5
Black	66.7	46.3	36.4	29.6

In Los Angeles, the Isolation Index has declined for Whites and Blacks while increasing for Hispanics and Asians. The decline in isolation for Black residents is especially large. The changes in Isolation Index values correspond with demographic shifts in the City. The proportion of the City's population that is White and Black has been declining since 1980 while the Hispanic and Asian American and Pacific Islander populations have increased. The especially large decline in the isolation index for Blacks may be due in part to the influx of Hispanics into many historically Black neighborhoods in South Los Angeles.

Table 3 Exposure Index

	1980	1990	2000	2010
Black /White	11.1	12.4	13.6	15.6
Hispanic/ White	28.7	20.1	15.4	14.9
Asian/White	41.3	35.8	31.5	32
White/Black	3.9	4.3	5.2	5.4
Hispanic/Black	10.9	11.8	10.6	9.4
Asian /Black	8.9	6.55	6.3	5.9
White/ Hispanic	16.5	21.5	24.9	25.2
Black/ Hispanic	18	36.1	43.1	46.6
Asian/ Hispanic	31.9	38.2	39.1	37.9
White/ Asian	5.4	8.8	11.4	13.8
Black /Asian	3.3	4.6	5.9	7.4
Hispanic/ Asian	7.2	8.8	9.1	9.6

Source: American Communities, Diversity and Disparities

<https://s4.ad.brown.edu/Projects/Diversity/segregation2010/city.aspx?cityid=644000>

Table 4 Average Census Tract Composition by Race and Ethnicity (Isolation and Exposure Indices) – Los Angeles – 2010 Census

Race or Ethnicity	White	Black	Hispanic	Asian American and Pacific Islander
White	54.9%	5.4%	25.2%	13.8%
Black	15.6%	29.6%	46.6%	7.4%
Hispanic	14.9%	9.4%	65.4%	9.6%
Asian American and Pacific Islander	32%	5.9%	37.9%	23.5%

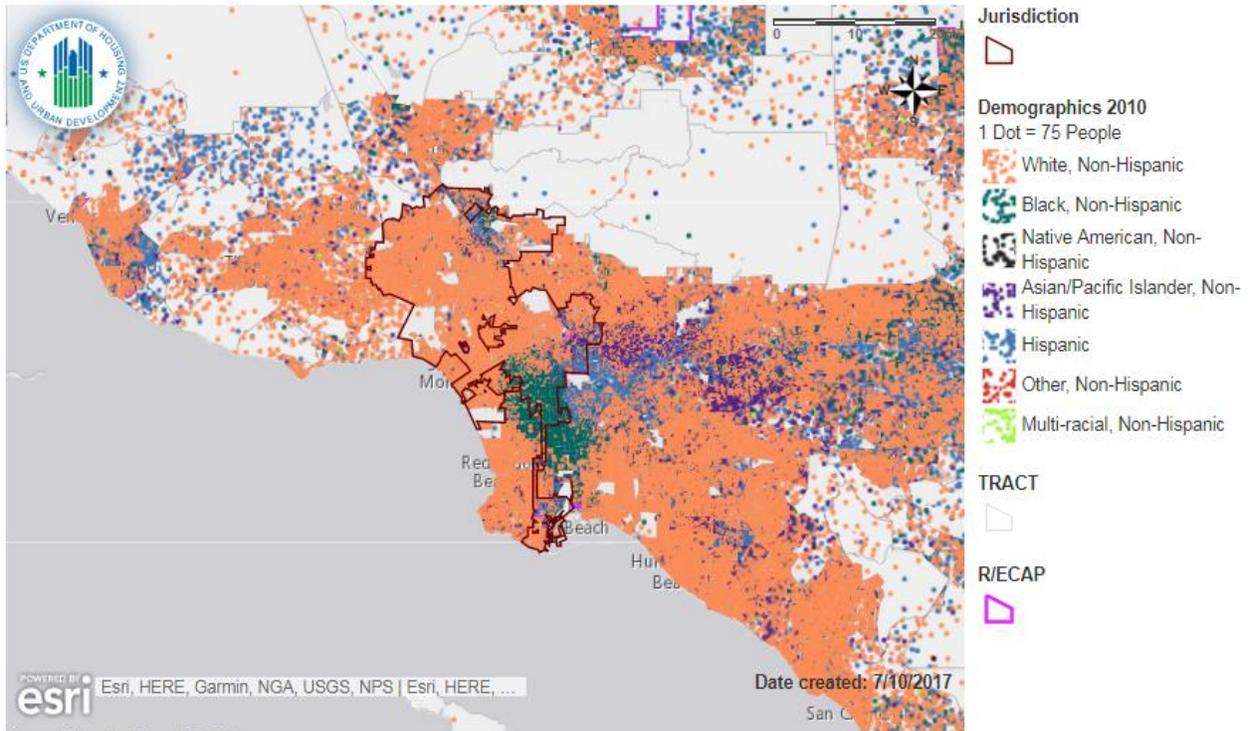
The Isolation and Exposure Indices confirm that Hispanic experience the highest levels of residential segregation in Los Angeles. A typical Hispanic resident lives in a census tract that is 65.4% Hispanic, 14.9% White, 9.4% Black, and 9.6% Asian American and Pacific Islander. Hispanic isolation is therefore the most of any group. White isolation is the second highest of any group. White exposure to Black residents in Los Angeles is the lowest of any group. Blacks have significant levels of exposure to Hispanic residents in the City and are the least exposed to Asian Americans and Pacific Islanders. Asian Americans experience the lowest levels of isolation of any group and have the greatest exposure to Whites of any non-White racial or ethnic group.

Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

Race/Ethnicity

Map 6 Los Angeles Region Race/Ethnicity

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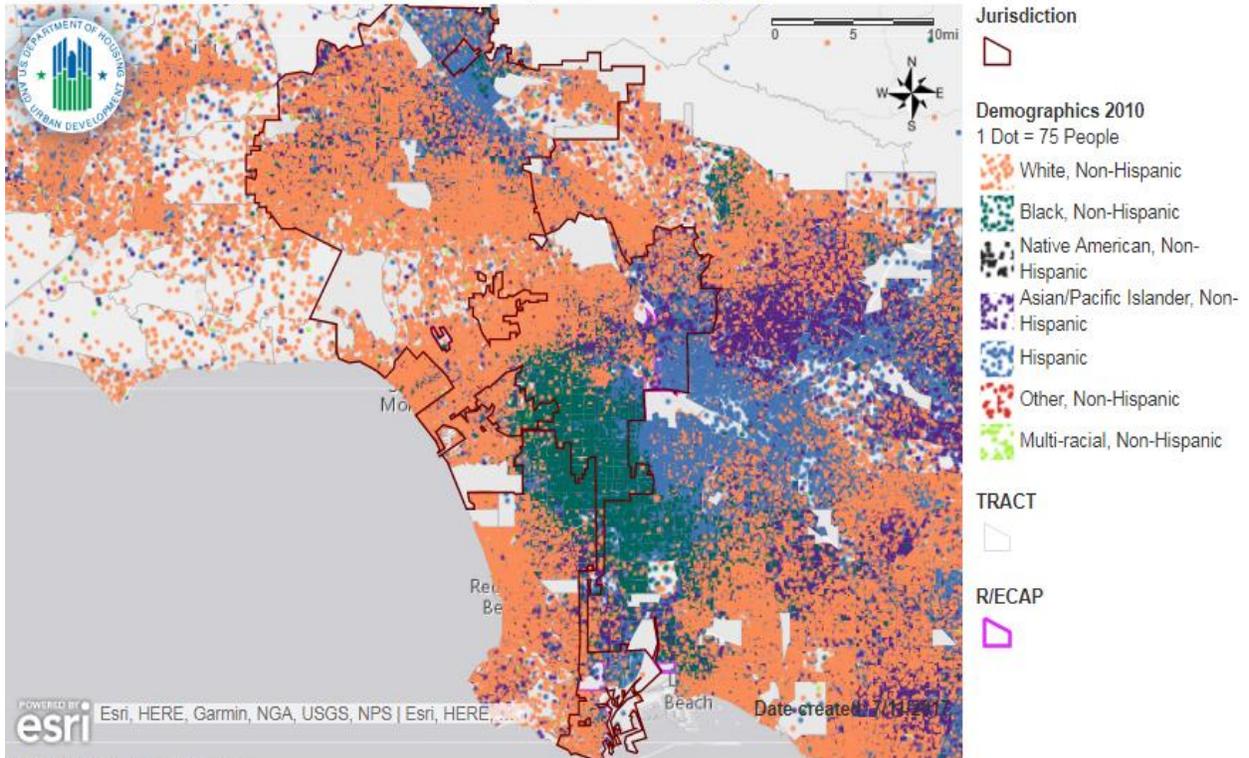
Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Map 7 Los Angeles City Race/Ethnicity HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

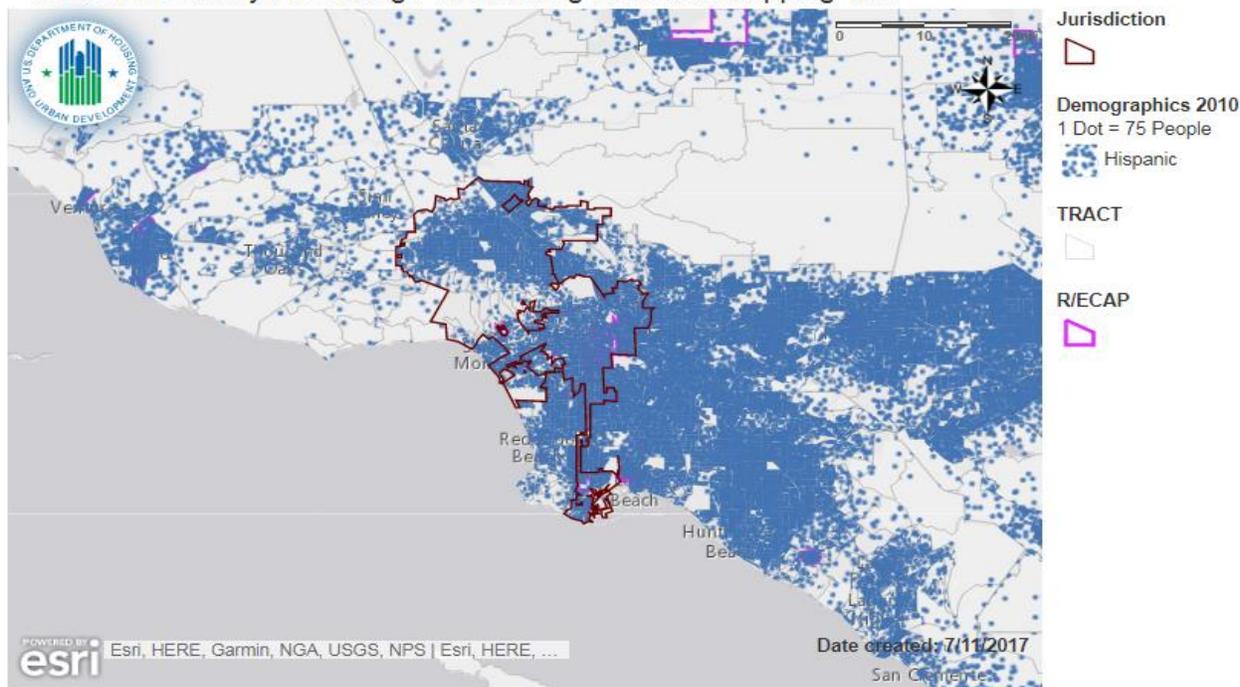
Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Map 8 Los Angeles City Hispanic Population

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

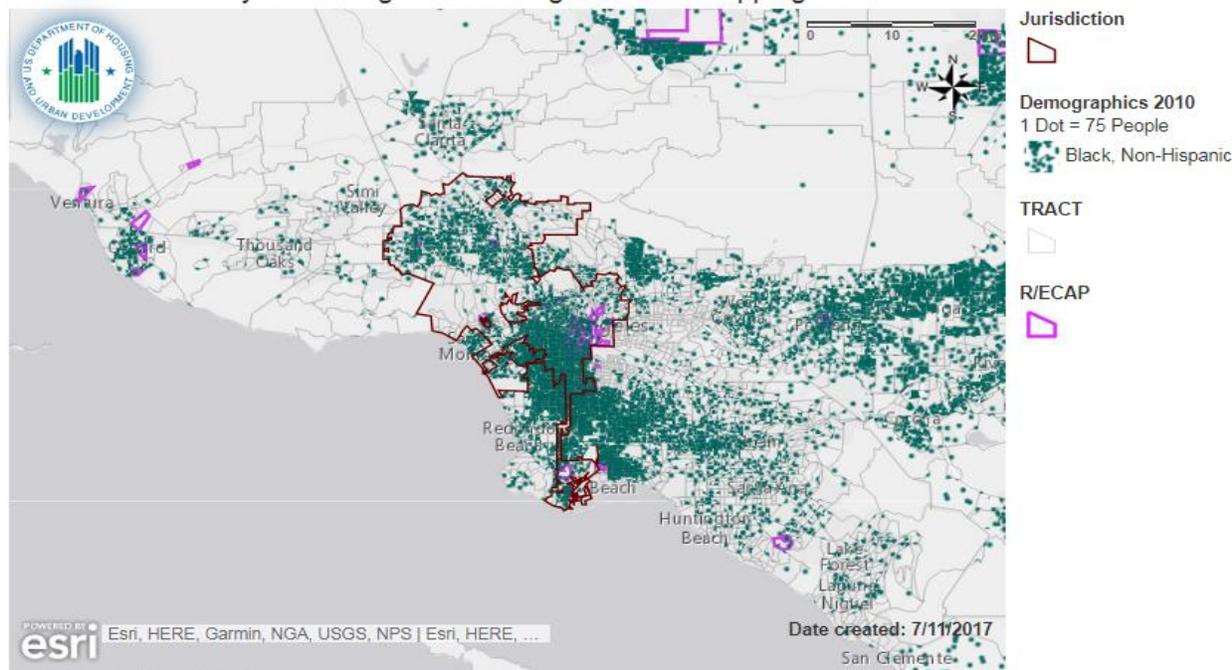
Hispanics are the largest ethnic group in the City and are most concentrated in East LA and South LA. There is an extremely high concentration of Hispanic individuals in the East LA neighborhoods of El Sereno, Boyle Heights, and Lincoln Heights. Hispanics are also the predominant group in eastern portions of South LA including neighborhoods such as Central-Alameda, Florence, and Historic South Central. Additionally, there are high Hispanic populations in Highland Park, Glassell Park, and Cypress Park in Northeast Los Angeles. In the Harbor Region surrounding the Port of Los Angeles, Hispanics are an overwhelming majority in the neighborhood of Wilmington as well as in eastern portions of San Pedro. Hispanics are also concentrated in eastern sections of the San Fernando Valley, particularly in Van Nuys, Arleta, Panorama City, Sylmar, Sun Valley, and Pacoima, as well as in the City of San Fernando. In Central LA, there are very high concentrations of Hispanics in Pico-Union and the Westlake District.

Outside of the City, unincorporated East Los Angeles is overwhelmingly Hispanic. East Los Angeles is one of the most ethnically homogenous communities in the entire region. Hispanics are also the vast majority of the population in many of the unincorporated areas and Gateway Cities in Southeast LA County to the east of the City of LA. The cities of Bell Gardens, Cudahy, Commerce, Huntington Park, Lynwood, Maywood, South Gate, and Walnut Park are all over 90% Hispanic while the larger City of Downey is more than 70% Latino. The San Gabriel Valley also has a high number of Hispanic residents. Several cities are majority Hispanic including Azusa, El Monte, La Puente, and West Covina. Hispanics are also the predominant group in Pomona. In Orange County, Hispanics are the predominant ethnic group in Santa Ana and are a majority of the population in Anaheim. Other portions of northwestern Orange County also

have significant concentrations of Hispanics. In Ventura County, the populations of Oxnard and Santa Paula are predominantly Hispanic.

Map 9 Los Angeles City Black Population

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

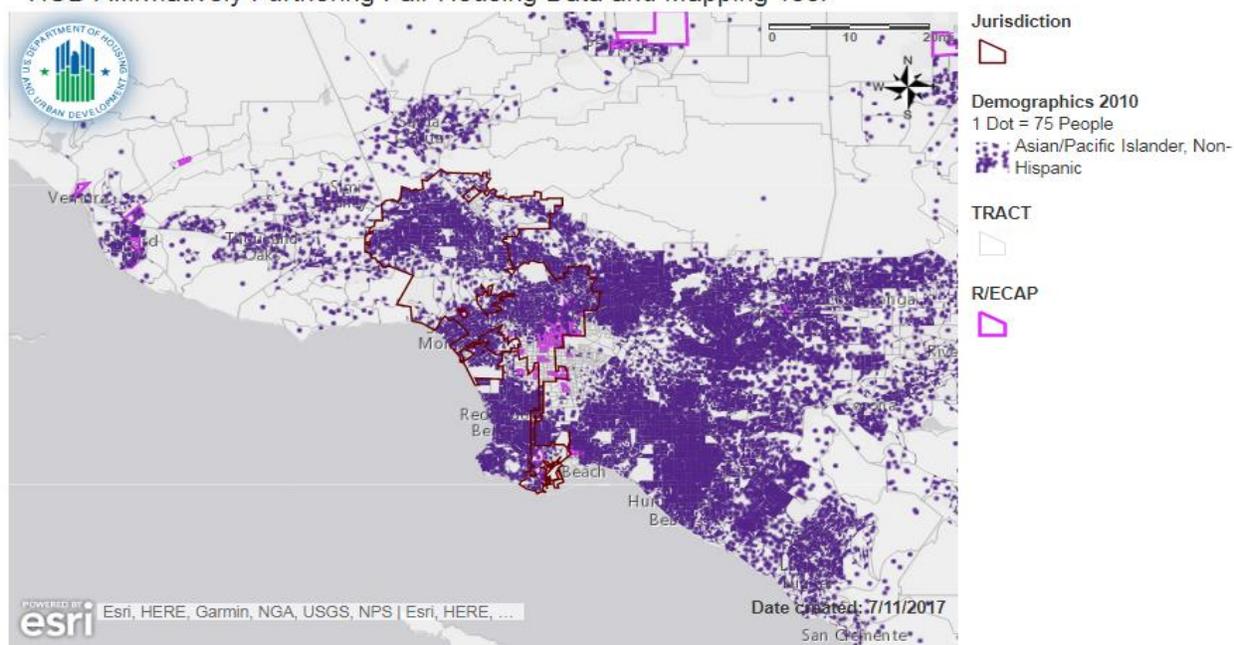
Black residents are heavily concentrated in South LA. In fact, 29% of all Black residents in LA County live in South LA.¹⁰ Although Black residents no longer constitute the majority of South LA residents, they remain a significant portion of the population in this region of the City. In particular, Black residents remain the predominant group in several western South LA neighborhoods including Baldwin Hills, Crenshaw, Hyde Park, Leimert Park, Manchester Square, and Gramercy Park. There are also high concentrations of Black residents in Downtown LA and the Harbor Gateway neighborhood.

In the rest of LA County, there are also high concentrations of Black residents in South Bay communities that neighbor South LA such as Inglewood, Gardena, Hawthorne, Compton, and Carson. The City of Long Beach also has a relatively high concentration of Black residents. Additionally, there are high concentrations of Black residents in Altadena, northwestern Pasadena, and the Cities of Lancaster and Palmdale in the Antelope Valley in northern LA County.

¹⁰ Center for the Study of Immigrant Integration, *Roots Races: Latino Engagement, Place identities, and Shared Futures in South Los Angeles*, October 2016, http://dornsife.usc.edu/assets/sites/731/docs/RootsRaices_Full_Report_CSII_USC_Final2016_Web_Small.pdf.

Map 10 Los Angeles City Asian American and Pacific Islander Population

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Within the City, Asian Americans and Pacific Islanders are most concentrated in Central LA. There are large concentrations of Asian residents in Chinatown, Downtown, Koreatown, Thai Town, Elysian Park, and Elysian Valley. Other sections of the City also have significant concentrations of Asian residents. In Northeast LA, there is a significant number of Asians in Eagle Rock. In West LA, there is a high concentration of Asians in Palms and Sawtelle. There is also a high concentration of Asians in Westwood, likely due in part to the presence of the University of California, Los Angeles.¹¹ In the San Fernando Valley, there are significant concentrations of Asians in Winnetka, Chatsworth, Porter Ranch, Northridge, North Hills, and Granada Hills. In South LA, there is a significant concentration of Asians in University Park where the University of Southern California (USC) is located.¹²

Outside of the City, the San Gabriel Valley has the highest concentration of Asian American individuals in the metropolitan area. Asian Americans are the majority group in many cities in the Valley including Alhambra, Arcadia, Diamond Bar, Monterey Park, Rowland Heights, San Gabriel, San Marino, Rosemead, Temple City, and Walnut. Asian Americans also make up a majority of the population in Cerritos in Southeast LA County and are a substantial part of the population in neighboring Artesia. In the South Bay, there are significant concentrations of Asians in Carson, West Carson, Gardena, Torrance, and the communities of the Palos Verdes Peninsula. In Orange County, Asians comprise a plurality of the

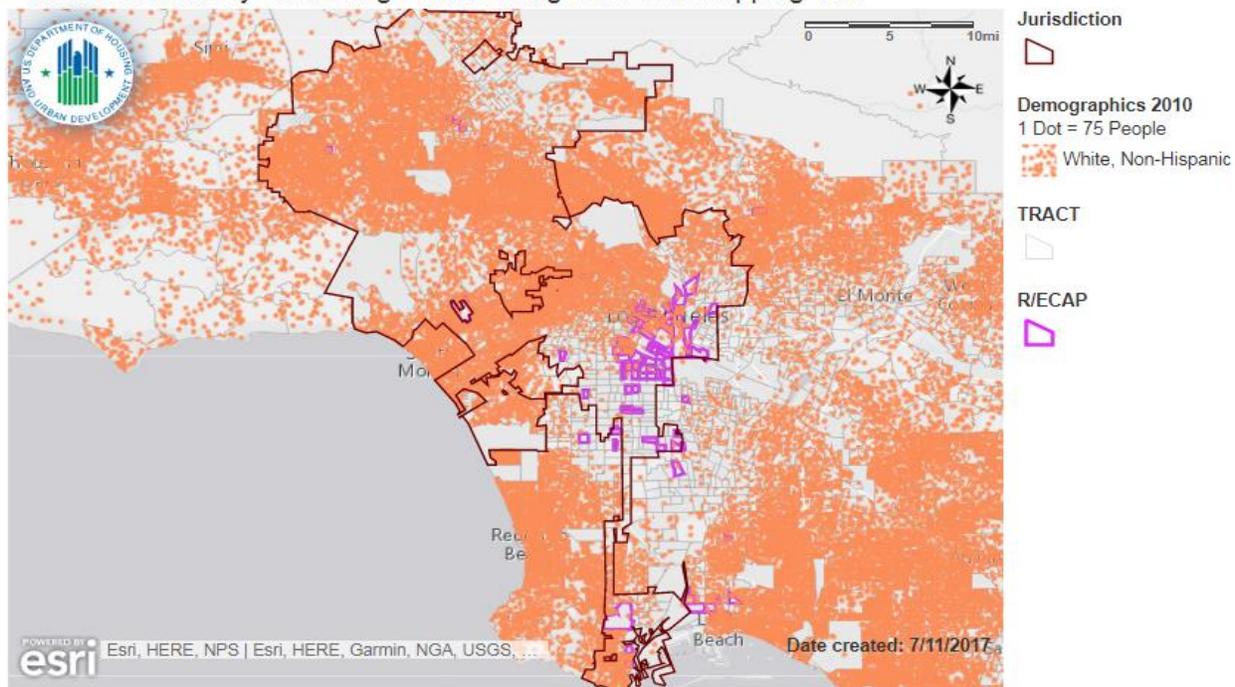
¹¹ For the Fall 2016 term, 32.1% of undergraduate students at UCLA were Asian or Pacific Islander. UCLA Academic Planning and Budget, Enrollment Demographics, Fall 2017, http://www.aim.ucla.edu/tables/enrollment_demographics_fall.aspx.

¹² U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates, https://factfinder.census.gov/bkmk/table/1.0/en/ACS/15_5YR/DP05/8600000US90007.

population in Westminster, Garden Grove, and Irvine, and there are high concentrations of Asians in western Orange County in communities such as Fullerton, Cyprus, and Stanton.

Map 11 Los Angeles City Non-Hispanic White Population

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Non-Hispanic White residents are most concentrated in West LA and in the San Fernando Valley. Many neighborhoods in West LA have a much higher percentage of White residents than the City does as a whole including Pico-Robertson, Westwood, Bel Air, Beverly Crest, Brentwood, Venice, Pacific Palisades, and Westchester. Valley neighborhoods with a high concentration of White residents include Encino, Valley Village, Studio City, Sherman Oaks, Tarzana, Woodland Hills, West Hills, Chatsworth, and Porter Ranch. Several neighborhoods in Central LA including the Fairfax District, Hollywood, the Hollywood Hills, Los Feliz, and Silver Lake also have relatively high concentrations of White residents.

To the north of the City, there is a substantial concentration of White residents in Santa Clarita. There are also high concentrations of Whites in the cities of Glendale and Burbank. On the Westside, West Hollywood, Santa Monica, and Beverly Hills are predominantly White. In far western LA County, several communities in the Santa Monica Mountains including Malibu, Calabasas, Hidden Hills, and Topanga have notably high concentrations of White individuals. In the South Bay, there are high concentrations of Whites in the Beach Cities of Manhattan Beach, Redondo Beach, and Hermosa Beach as well as the Palos Verdes peninsula and El Segundo. Many coastal communities in Orange County such as Laguna Beach, Huntington Beach, and San Clemente have a high concentration of White individuals. Much of eastern Ventura County, including Thousand Oaks and Simi Valley, is also predominantly White.

LA County has the largest population of Native Americans of any county in the country.¹³ The Native American population is dispersed throughout the metropolitan area with the highest concentrations in Central LA, Long Beach, Palmdale, and Lancaster.

Integration

In Central LA, the Mid-Wilshire neighborhood is the most integrated area in the City with substantial White, Hispanic, Asian, and Black populations. To the south of Mid-Wilshire, Mid-City has significant White, Hispanic, and Black populations. Downtown LA has significant White, Hispanic, Black, and Asian populations. Koreatown is one of the densest neighborhoods in the City and is integrated largely between Hispanic and Asian populations. Hollywood and East Hollywood are integrated among Whites, Hispanics, and Asians. The Silver Lake, Echo Park, and Los Feliz sections of the City are relatively integrated among Whites, Hispanics, and Asians.

In West LA, Westchester, Del Rey, Mar Vista, Sawtelle and Palms are relatively well integrated with substantial White, Hispanic, and Asian populations. Westwood is integrated between Whites and Asians. Sections of the San Fernando Valley such as Chatsworth, Northridge, Reseda, Winnetka, North Hills, Granada Hills, Mission Hills, and Sunland-Tujunga are relatively integrated among Hispanics, Whites, and Asians. Porter Ranch is primarily White and Asian. North Hollywood is another relatively integrated area with large White, Hispanic, Asian, and Black populations. The Harbor Gateway neighborhood connecting the Harbor region to the rest of Los Angeles has sizeable Asian, Hispanic, and Black populations. In the Harbor Region, Harbor City has substantial Hispanic, White, Black, and Asian populations. South LA is integrated between Black residents and Hispanics. Nearly all of the neighborhoods in this part of the City are almost completely Black and Hispanic. A notable exception is the University Park neighborhood which is relatively integrated among Whites, Asians, and Hispanics. This integration is largely due to an increase in University of Southern California students, faculty, and staff seeking housing close to campus.¹⁴ As students have moved toward student-oriented housing, some longtime residents of color have been displaced and there may not be much interaction between families and students.¹⁵ In Northeast LA, there is integration among Asian Americans, Hispanics, and Whites in Eagle Rock and much of Highland Park and Glassell Park.

In the rest of LA County, Culver City is an integrated community with substantial White, Black, Asian, and Hispanic populations. In the South Bay, Carson and Gardena are integrated among Hispanics, Asians, and Black residents. Inglewood and Hawthorne are primarily integrated between Hispanics and Black residents. The Palos Verdes peninsula is primarily integrated between Whites and Asians. Several communities in the San Gabriel Valley are integrated primarily between Asians and Hispanics including Alhambra, Hacienda Heights, and Monterey Park. Claremont, Covina, West Covina, Diamond Bar, Monrovia, and San Dimas are integrated areas with substantial White, Hispanic, and Asian populations. Whittier is a City that has integration between a Hispanic majority and a substantial White population. Pasadena has substantial Hispanic, Black, Asian, and White populations, but the Black population within the City is concentrated. Glendale, the third-largest City in LA County, is integrated among Whites, Asians, and Hispanics. Long Beach is the second-largest city in LA County and is relatively well integrated at the city-level with

¹³ https://www.aisc.ucla.edu/research/images/LAUIR_LAstatus.pdf

¹⁴ KPCC Report: *As USC student housing increases, affordable housing harder to find for residents*, May 2015, <http://www.scpr.org/news/2015/05/06/51377/south-la-housing-affected-by-usc-growth-report-say/>.

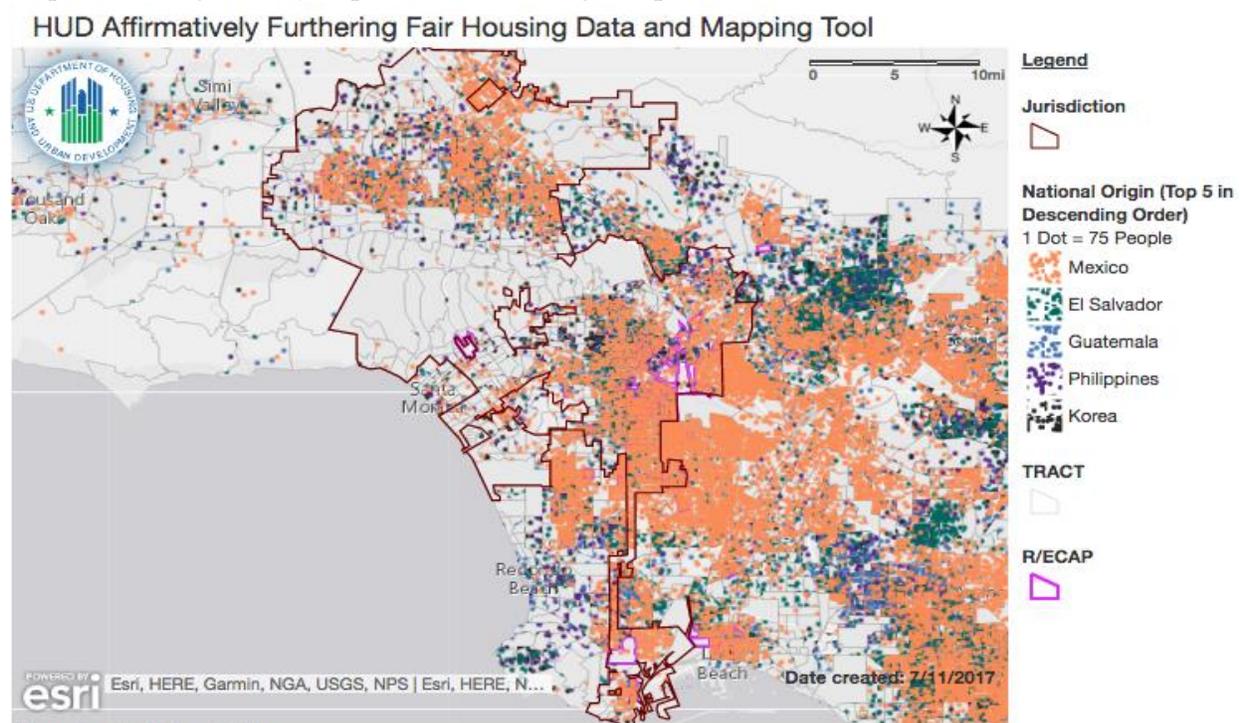
¹⁵ Daily Trojan, *USC growth forces locals to adapt*, April 2016, <http://dailytrojan.com/2016/04/17/usc-growth-forces-locals-adapt/>.

substantial Asian, White, Hispanic, and Black populations. Santa Clarita is integrated among Whites, Hispanics, and Asians. Palmdale and Lancaster in northern LA County are relatively integrated among Whites, Hispanics, Asians, and Black residents. Anaheim, Buena Park, Cypress, Fullerton, and Garden Grove are cities in Orange County that are integrated among Hispanics, Whites, and Asians. Irvine is another relatively integrated city in Orange County but is predominantly Asian and White.

National Origin

In considering patterns of segregation and integration on the basis of national origin and limited English proficiency (LEP) status, it is important to keep in mind that, although certain national origins are likely to be correlated with LEP individuals who speak the primary languages of those countries, there are nuances to the analysis. For instance, recent immigrants, who are more likely to have LEP status, may be concentrated in different neighborhoods than second or third generation Americans. This can have important implications for the implementation of local housing and community development policies. It may not make sense to prioritize resources for translated materials in a neighborhood that is, for example, 20% Filipino but within which just 1% of residents are LEP Tagalog speakers. At the same time, if a neighborhood is 10% Filipino but 5% of residents are LEP Tagalog speakers, such an investment may be more effective. Apparent discrepancies between which neighborhoods have national origin concentrations and which have LEP concentrations are reflective of the underlying HUD-provided data, and those differences may be useful for planning purposes.

Map 12 Los Angeles City Top Five National Origin Population



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

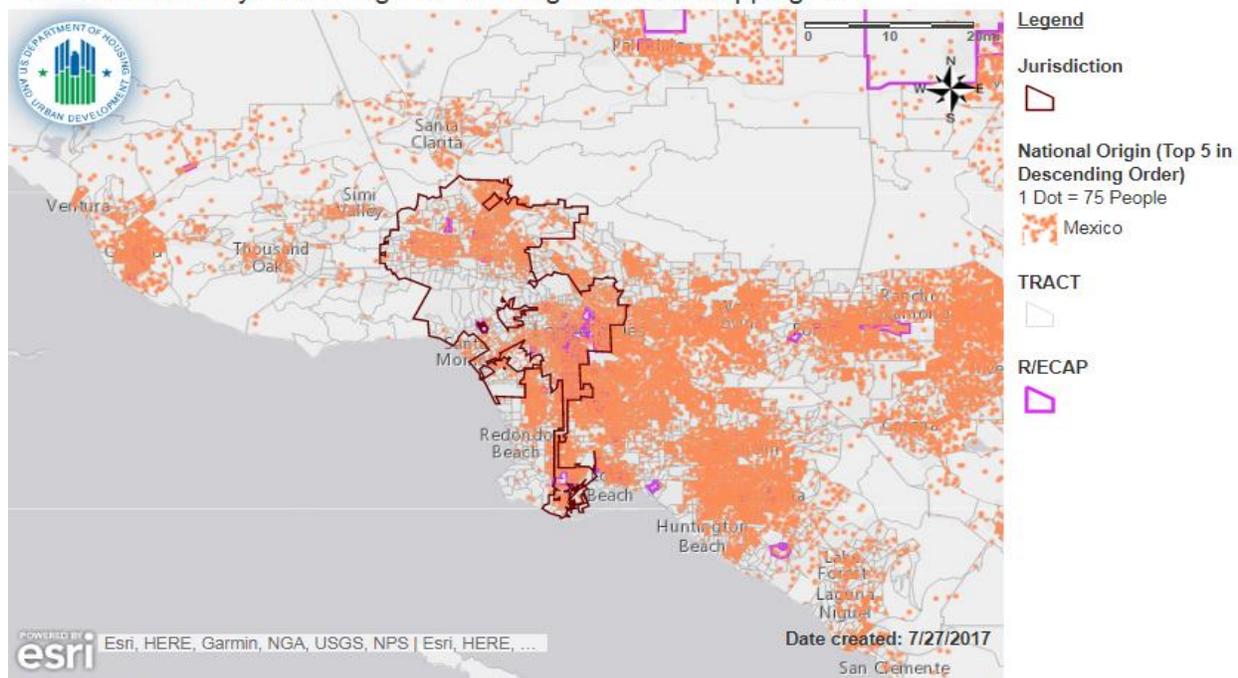
Region: Los Angeles-L onn Beach-Anaheim, CA

LA has long been one of the top destinations for immigrants to the United States. Accordingly, foreign-born individuals make up a large portion of the City and metropolitan area populations. According to the

2011-2015 American Community Survey, 38.2% of the City's population is foreign born while approximately 35% of LA County's population is foreign born. The most common countries of origin of LA City residents are Mexico, El Salvador, Guatemala, the Philippines, and Korea. In LA County overall, the most common countries of origin of residents are Mexico, China, the Philippines, Taiwan, and Korea. In Orange County, the most common countries of origin of residents are Mexico, Vietnam, Korea, the Philippines, and Iran.

Map 13 Los Angeles City Mexican Population

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

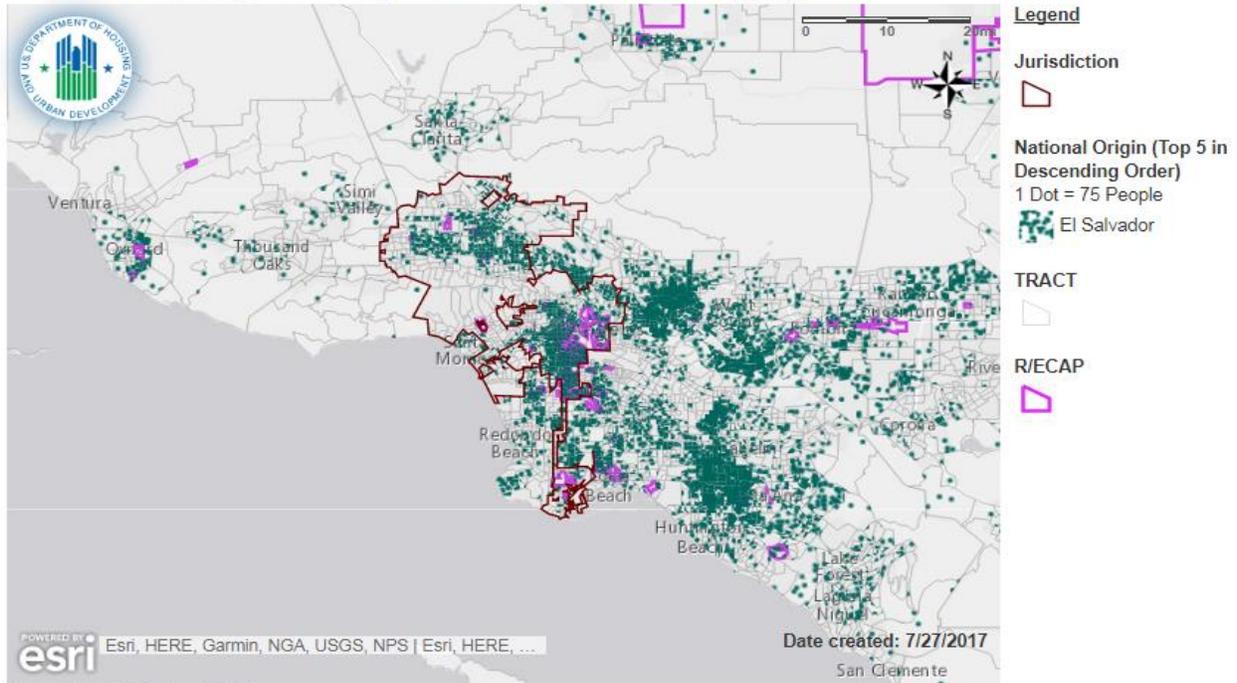
Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Individuals of Mexican origin are the largest foreign-born group in the Los Angeles Metropolitan Area and are found throughout most of the City. There are high concentrations of individuals of Mexican origin in the City in East LA, Central LA in the Westlake District and Pico-Union, throughout South LA, and in the Harbor region. There is also a high concentration of Mexican Americans in the San Fernando Valley, particularly in the areas of Pacoima, Sylmar, Van Nuys, and Canoga Park. Outside of the City, there are very high Mexican American populations in unincorporated East Los Angeles, the South Bay cities of Inglewood and Hawthorne, Compton and many other cities in southeast LA County, and in Long Beach. There are also significant Mexican American populations in the San Gabriel Valley, Pomona, and Altadena. In Orange County, there are dense populations of Mexican origin in Santa Ana, Anaheim, Westminster, Stanton, and Fullerton. In Ventura County, Mexican Americans are concentrated in Oxnard, Santa Paula, and Ventura.

Map 14 Los Angeles City Salvadoran Population

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

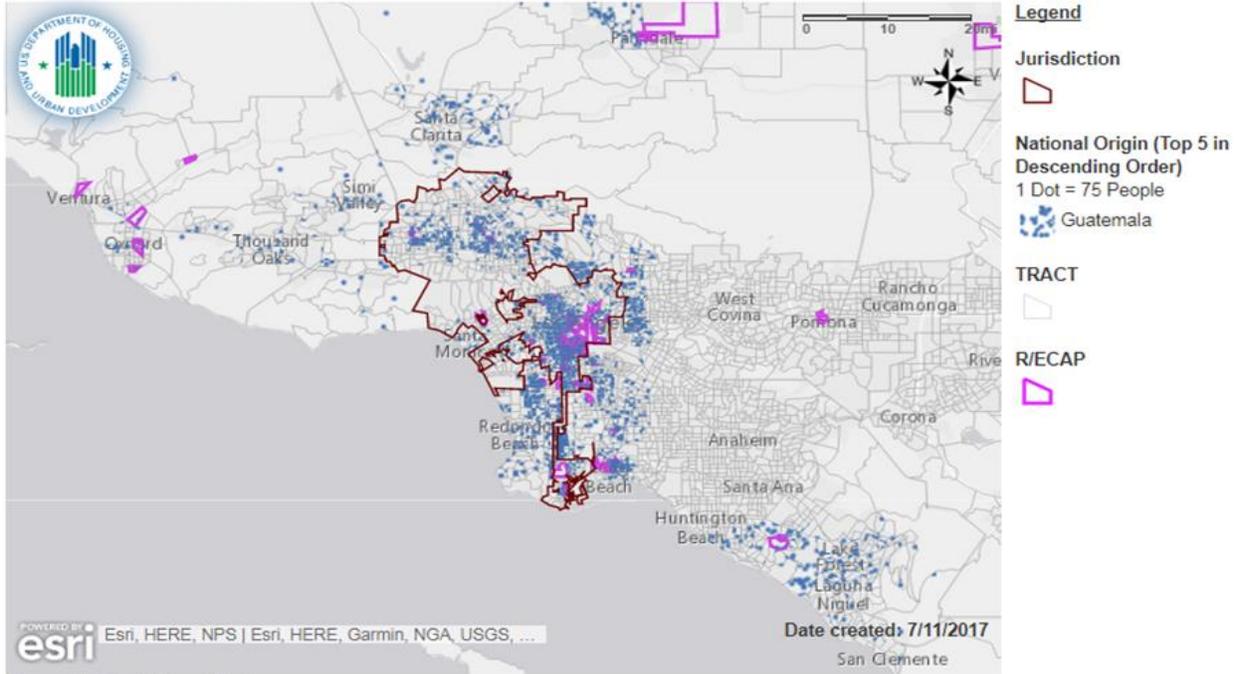
Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Salvadoran Americans are most concentrated in Central LA in Hollywood, East Hollywood, the Westlake District, and Pico-Union and throughout South LA. There is also a significant number of Salvadoran American individuals in the eastern San Fernando Valley. Outside of the City limits, there are also high concentrations of Salvadoran Americans in the San Gabriel Valley, South Pasadena, Pasadena, and Glendale. In Orange County, there are significant concentrations of Salvadoran Americans in Anaheim, Garden Grove, Stanton, and Westminster as well as the northwestern corner of the County.

Map 15 Los Angeles City Guatemalan Population

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

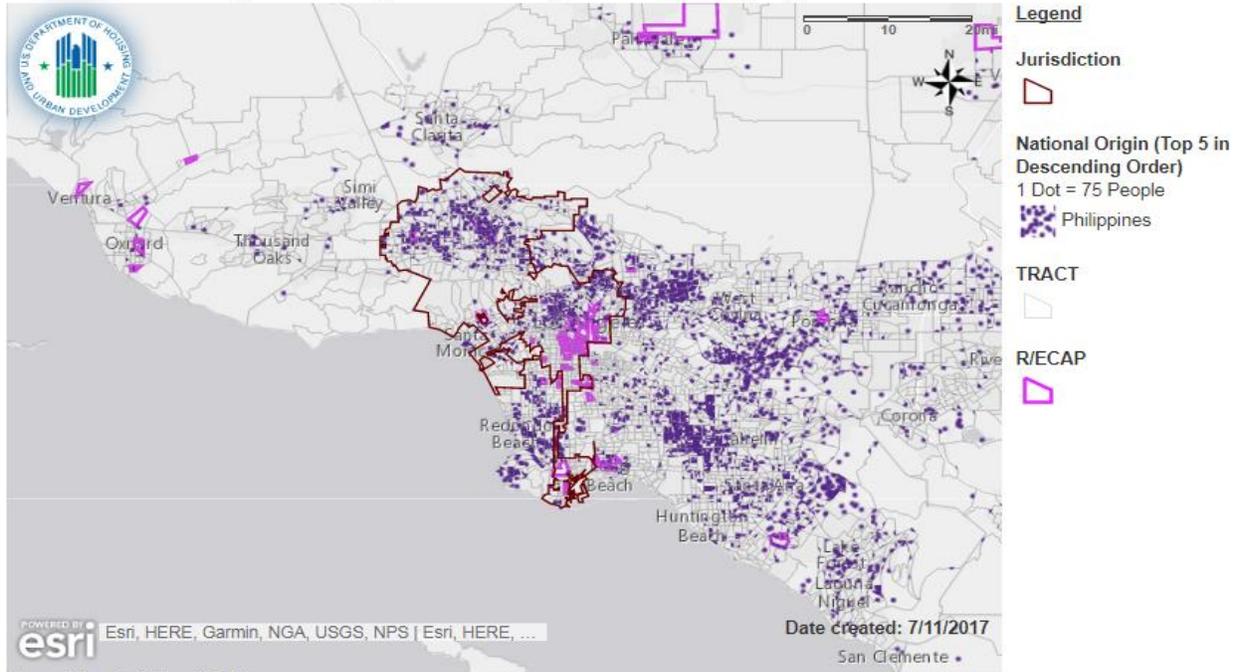
Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Individuals of Guatemalan origin are concentrated in Central LA near downtown and Hollywood, and there are also many Guatemalan individuals dispersed throughout South LA. There are also significant concentrations in Panorama City in the San Fernando Valley, Long Beach, and in the San Gabriel Valley. Guatemalans are concentrated in Hawthorne, Carson, and in southeast LA County near Cerritos.

Map 16 Los Angeles City Filipino Population

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

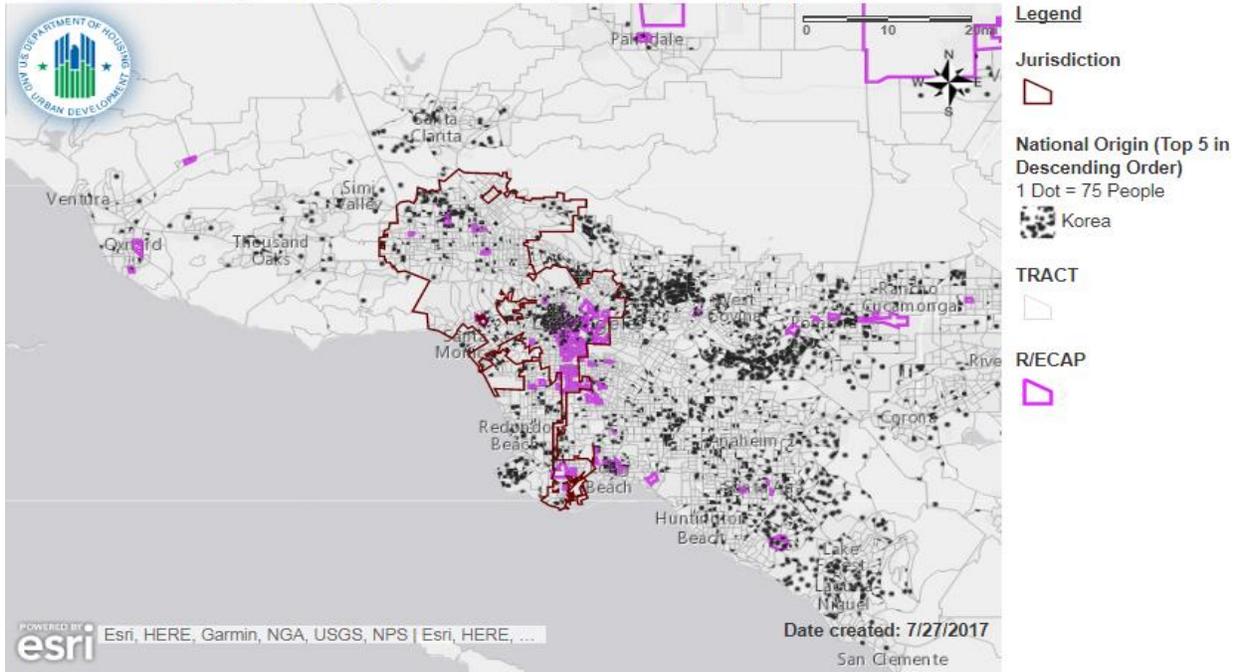
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Filipino individuals are concentrated in Central LA to the west of downtown in Historic Filipinotown within Echo Park, the Westlake District, Koreatown, and Hollywood. There are significant Filipino populations in the Harbor Gateway neighborhood, Eagle Rock, and the San Fernando Valley in and around Panorama City, as well. In the rest of LA County, there are also high concentrations of Filipinos in the San Gabriel Valley, Torrance, Cerritos, and Glendale.

Map 17 Los Angeles City Korean Population
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

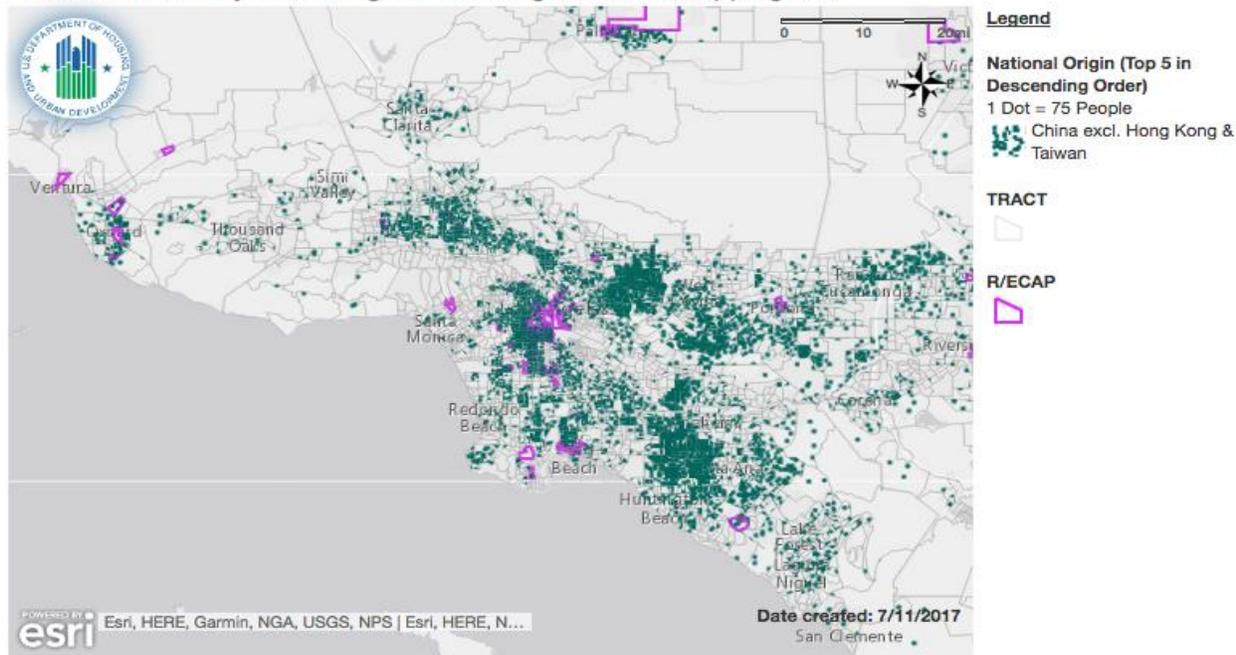
Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Koreatown has by far the highest concentrations of individuals of Korean origin in Los Angeles. There is also a substantial number of Korean Americans in adjacent neighborhoods such as the Westlake District and Mid-Wilshire. Korean Americans are also concentrated in western sections of the San Fernando Valley. In addition, there are concentrations of Korean Americans in Glendale, southeast LA County in cities including Cerritos and La Mirada, and in the San Gabriel Valley. In Orange County, Korean Americans are concentrated in Fullerton and Irvine.

Map 18 Los Angeles Region Chinese Population

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

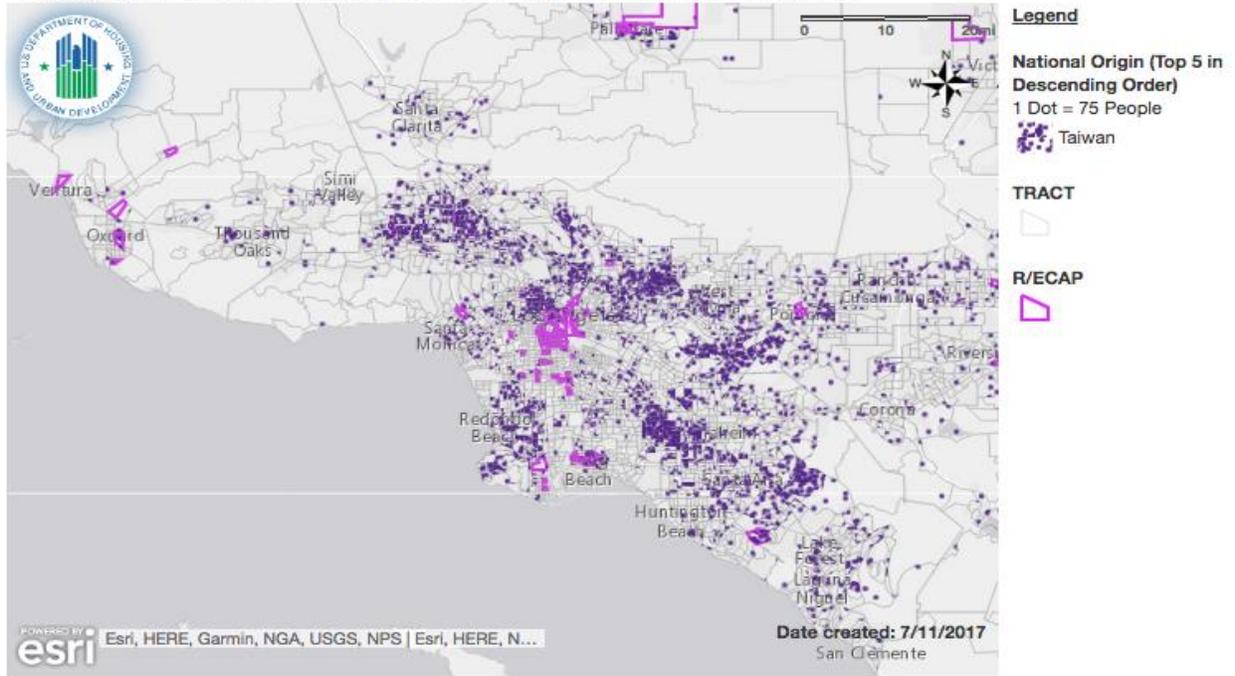
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles County (HOME)

Region: Los Angeles-Long Beach-Anaheim, CA

Many individuals of Chinese origin are concentrated in Central LA, particularly to the west of Downtown. The San Fernando Valley, Burbank, and Glendale also have relatively high concentrations of Chinese American individuals. The highest concentration of Chinese American individuals in the Los Angeles Metropolitan area is in the San Gabriel Valley, particularly in the western portion of the Valley. Additionally, there are high concentrations of Chinese American individuals in southeast LA County and in Anaheim, Buena Park, Garden Grove, Westminster, and Stanton in Orange County.

Map 19 Los Angeles Region Taiwanese Population
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

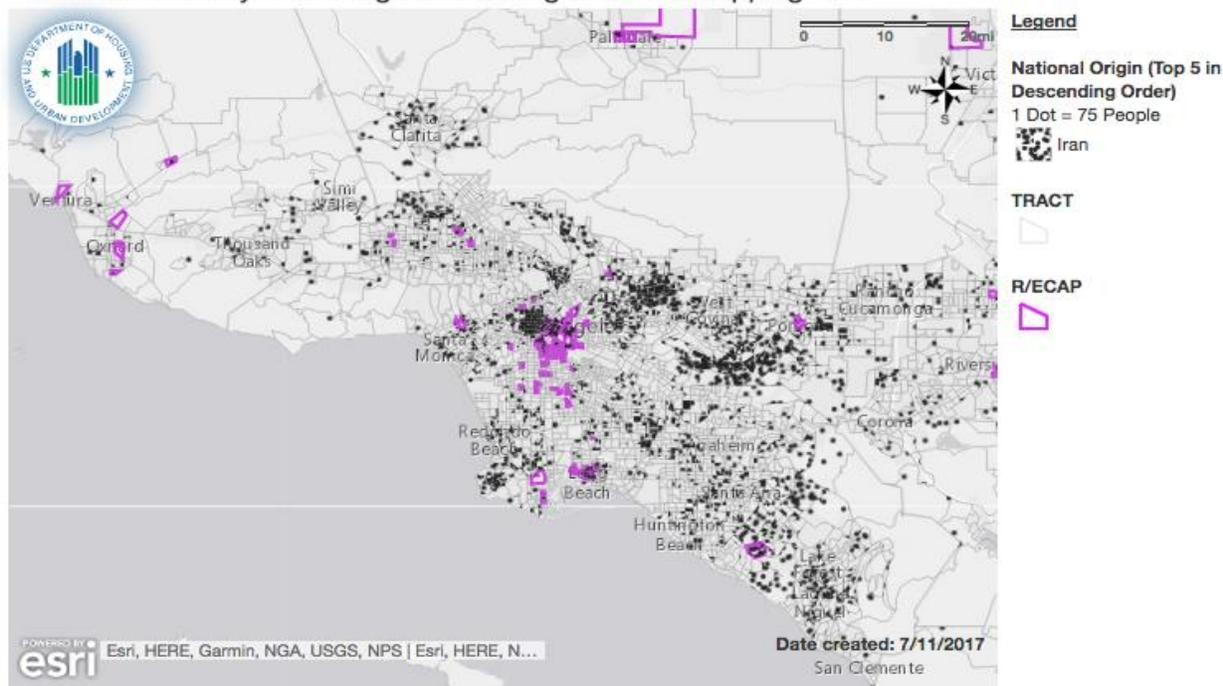
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles County (HOME)

Region: Los Angeles-Long Beach-Anaheim, CA

Taiwanese American individuals are concentrated in Central LA to the west of Downtown and the San Fernando Valley. There are also large concentrations of Taiwanese American individuals in the western San Gabriel Valley and in southeast Los Angeles County in Cerritos and neighboring cities.

Map 20 Los Angeles Region Iranian Population HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

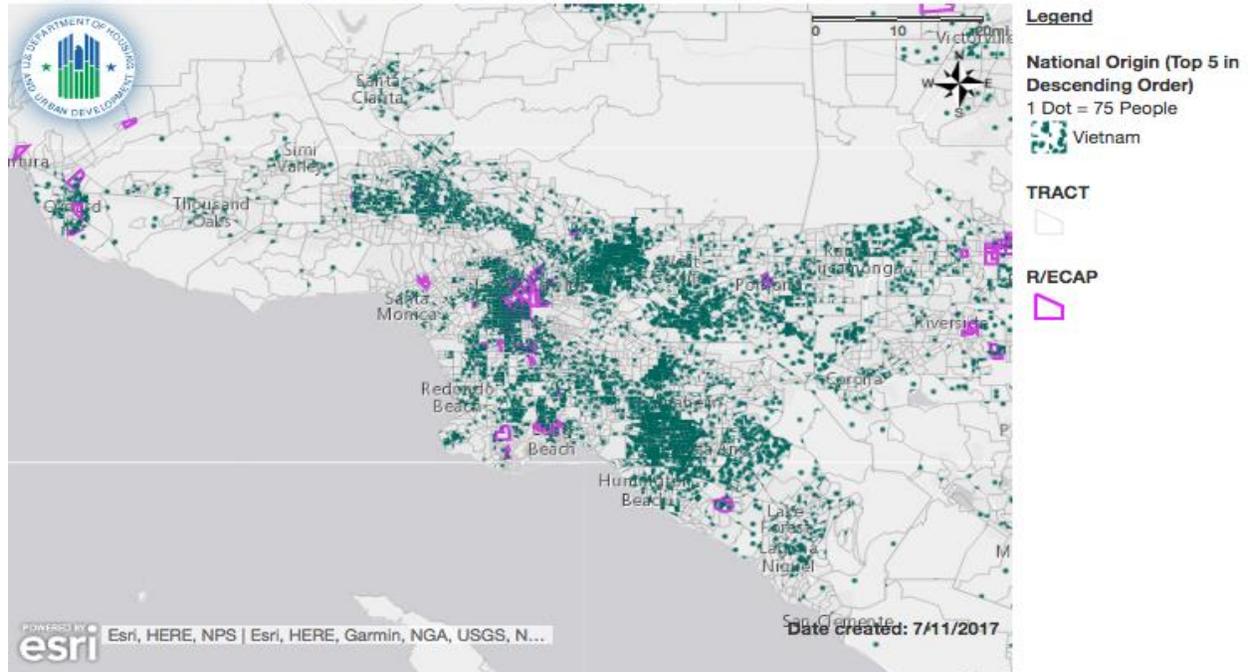
Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Orange County (HOME)

Region: Los Angeles-Long Beach-Anaheim, CA

Individuals of Iranian origin are dispersed throughout the region but are most concentrated in Central LA, in Koreatown, Harvard Heights, and Arlington Heights as well as in the northern San Fernando Valley. The San Gabriel Valley and Glendale also have a relatively high concentration of Iranian Americans. These distributions, which are apparent in the HUD-provided data, are not consistent with local perceptions of where the Iranian American population is concentrated. This may be the result of concentrations of Iranian American businesses in certain areas, such as Westwood, that do not necessarily line up with where individual Iranian American households actually live.

Map 21 Los Angeles Region Vietnamese Population
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs

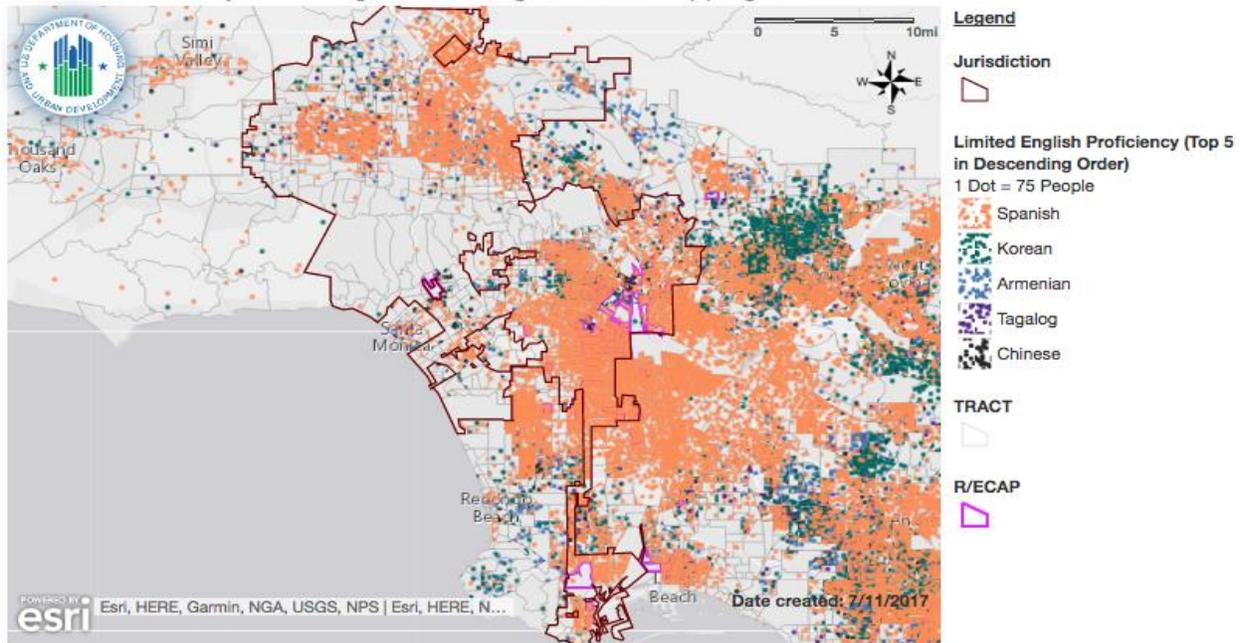
Jurisdiction: Orange County (HOME)

Region: Los Angeles-Long Beach-Anaheim, CA

Within LA City limits, Vietnamese American individuals are concentrated in Central LA to the west of downtown and stretching into East Hollywood. Other concentrations are located in the central San Fernando Valley as well as Glendale and the San Gabriel Valley. Regionally, Vietnamese American individuals are most heavily concentrated in western Orange County, particularly in Stanton, Garden Grove, Santa Ana, and Westminister.

Limited English Proficiency (LEP)

Map 22 Los Angeles City Top Five Languages Outside (apart from English)
HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 4 - LEP

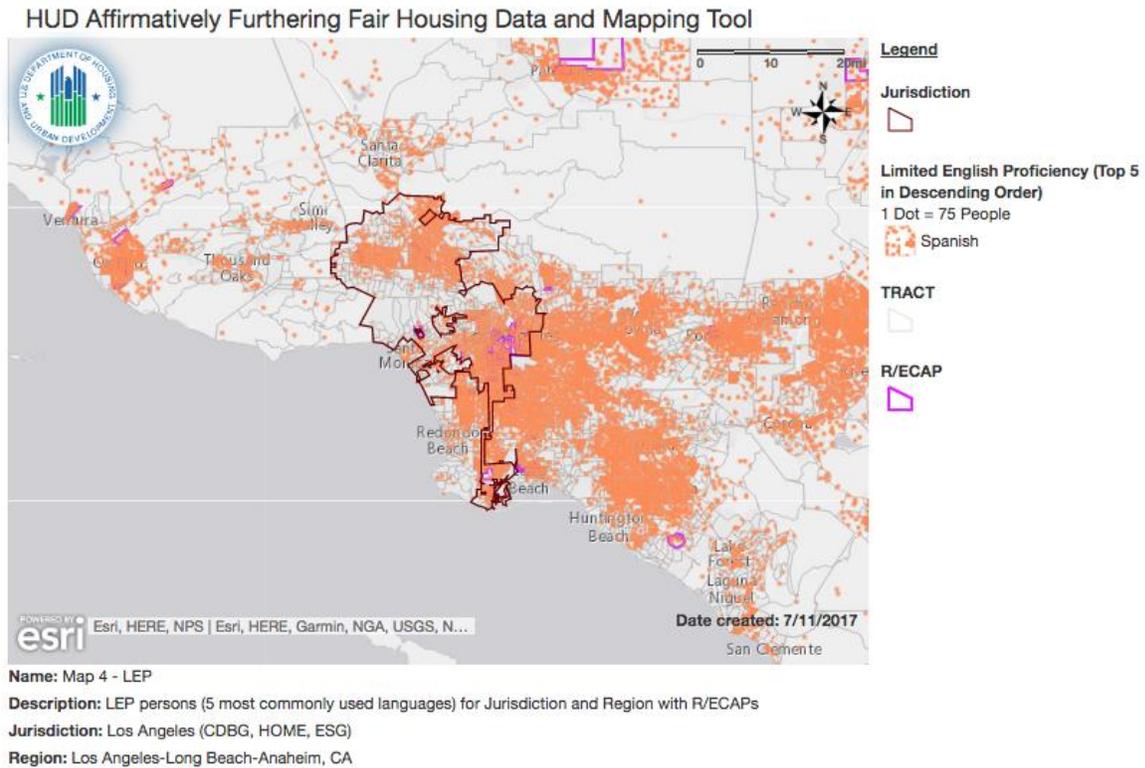
Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

In LA City, the top foreign languages spoken by those with Limited English Proficiency are Spanish, Korean, Armenian, Tagalog, and Chinese. In LA County as a whole, the most commonly spoken foreign languages by LEP individuals are Spanish, Chinese, Korean, Vietnamese, and Tagalog. In Orange County, the most commonly spoken foreign languages among LEP individuals are Spanish, Korean, Vietnamese, Chinese, and Persian.

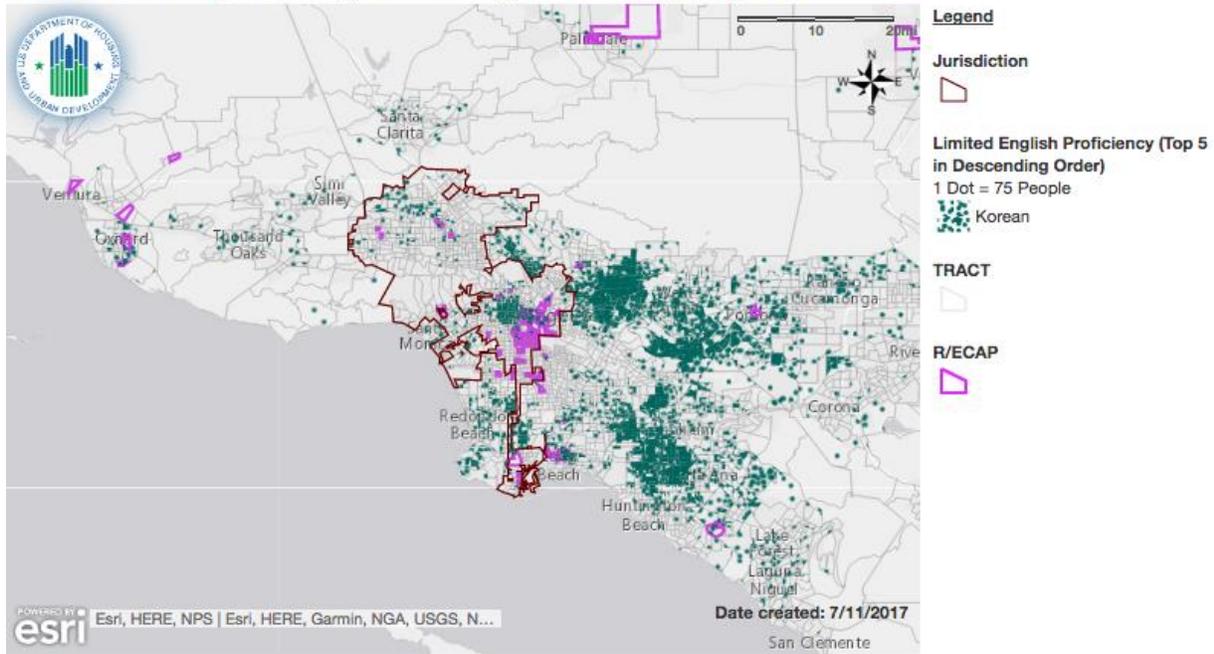
Map 23 Los Angeles Region Spanish Speakers



Spanish is by far the most commonly spoken language among LEP individuals in LA. There is a high concentration of Spanish speakers throughout the City with the highest concentrations in Central LA, South LA, East LA, and much of the San Fernando Valley. Many of the Gateway Cities bordering LA City as well as unincorporated East Los Angeles also have very high concentrations of Spanish Speakers. The San Gabriel Valley and much of southeast LA County also have high concentrations of LEP Spanish speakers as does western Orange County and Oxnard in Ventura County.

Map 24 Los Angeles Region Korean Speakers

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

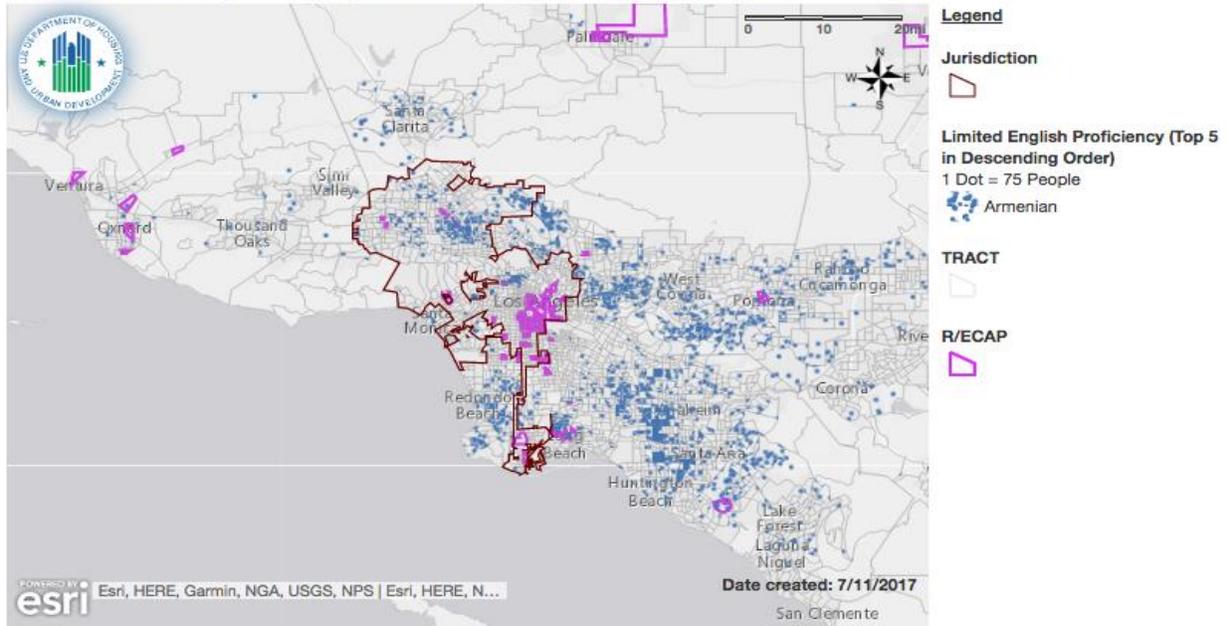
Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Korean speakers are concentrated in Central LA in Koreatown and the western San Fernando Valley. In addition, there are significant numbers of LEP Korean speakers in the San Gabriel Valley, western Orange County, and southeast LA County.

Map 25 Los Angeles Region Armenian Speakers

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

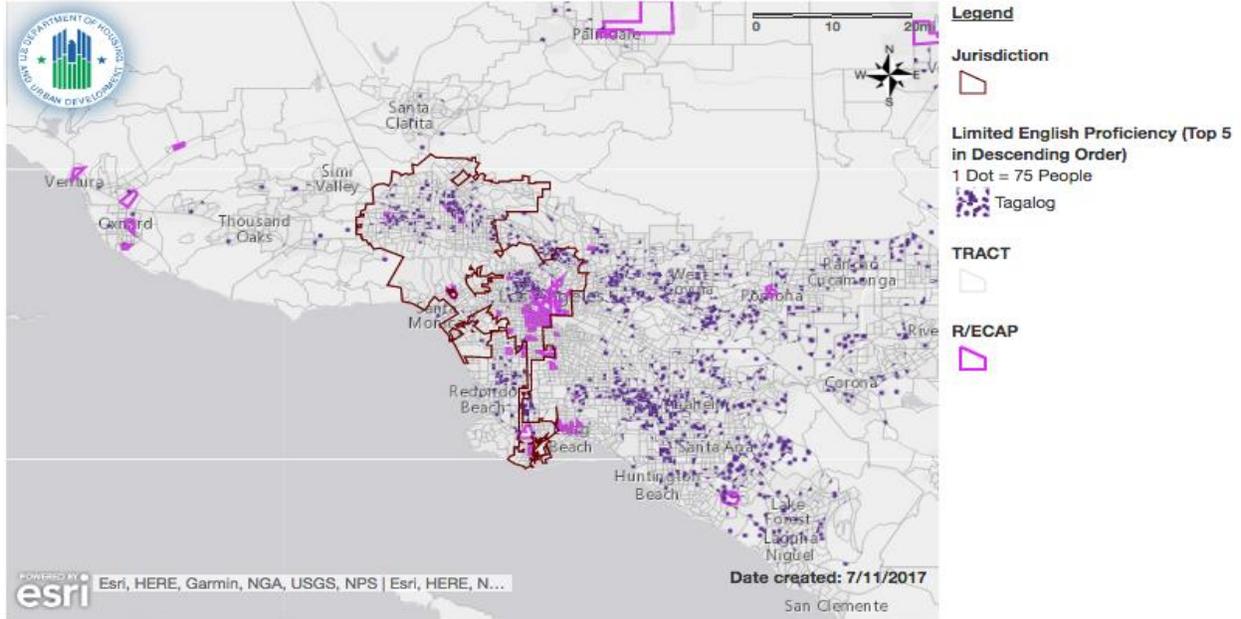
Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Armenian speakers with limited English proficiency are concentrated in East Hollywood, where Little Armenia is located, as well as in the San Fernando Valley. Outside of the City, there is also a significant number of Armenian speakers in Glendale and the western San Gabriel Valley as well as in western Orange County.

Map 26 Los Angeles Region Tagalog Speakers

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

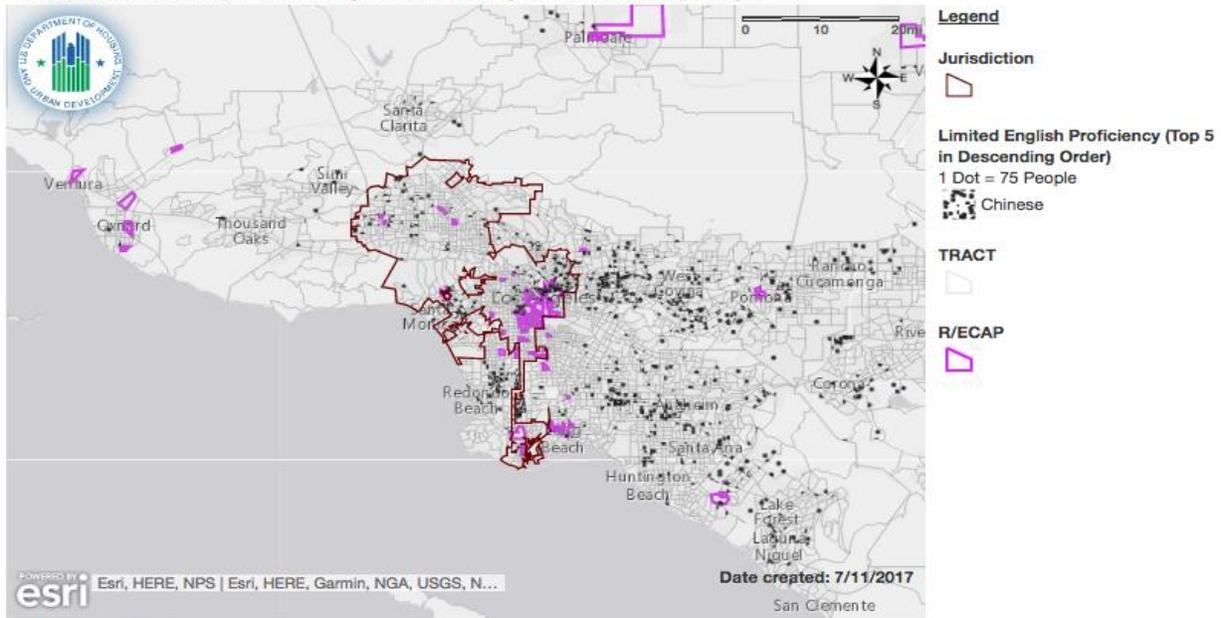
Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Speakers of Tagalog are concentrated in Central LA to the west of Downtown, Eagle Rock, and the San Fernando Valley, particularly in Panorama City and Winnetka. There are also relatively high concentrations of Tagalog speakers in Glendale, Carson, Long Beach, and the San Gabriel Valley. Other areas with relatively high numbers of Tagalog speakers are in southeast LA County and western Orange County.

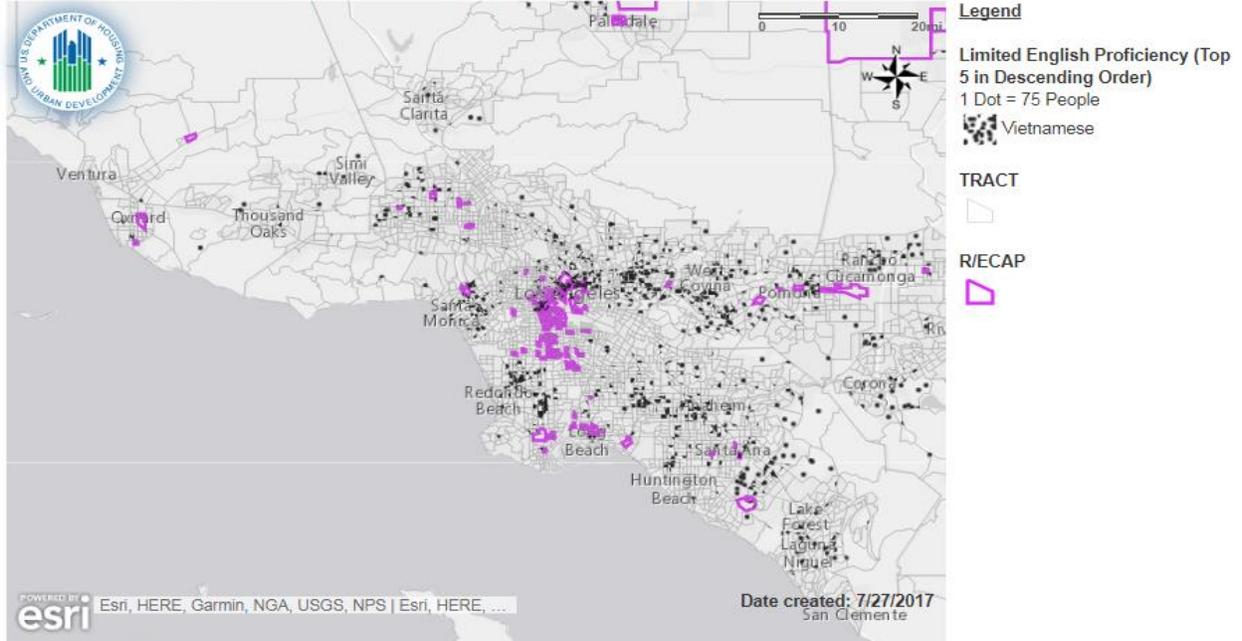
Map 27 Los Angeles Region Chinese Speakers

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Within LA City, Chinese speakers are most heavily concentrated in Chinatown, Elysian Park, and Lincoln Heights. In the metropolitan area, Chinese speakers are also concentrated in the San Gabriel Valley and in southeast LA County.

Map 28 Los Angeles Region Vietnamese Speakers
 HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

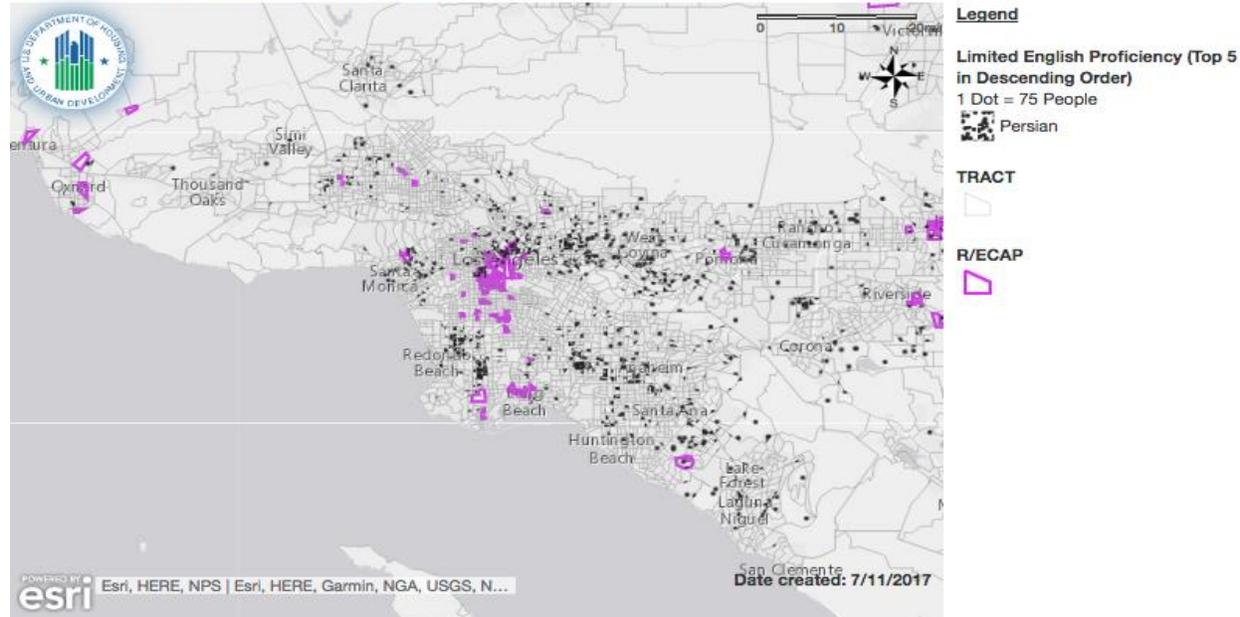


Name: Map 4 - LEP
Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs
Jurisdiction: Los Angeles County (HOME)
Region: Los Angeles-Long Beach-Anaheim, CA

Vietnamese speakers are concentrated in East Hollywood as well as in the San Fernando Valley, particularly in Van Nuys and Sunland-Tujunga. Outside of the City, the highest concentrations of Vietnamese speakers in the San Gabriel Valley, southeast LA County, and western Orange County in communities such as Westminster, Stanton, and Midway City.

Map 29 Los Angeles Region Persian Speakers

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs

Jurisdiction: Orange County (HOME)

Region: Los Angeles-Long Beach-Anaheim, CA

Persian speakers are concentrated in Central LA north of Downtown, in South LA surrounding USC, and in Westwood and Brentwood. Additionally, significant concentrations of Persian speakers are located in the San Gabriel Valley, western Orange County, and areas of southeast LA County such as Cerritos.

Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

Los Angeles has experienced a slight but steady decline in segregation as measured by the Dissimilarity Index since 1990 though Hispanic and Asian residents are now more segregated as measured by the Isolation and Exposure Indices. Overall, the non-White/White Dissimilarity Index has declined slightly since 1990 but still indicates a high level of segregation between non-Whites and Whites. LA City is slightly more segregated than the region is as a whole. The region as a whole is moderately segregated and overall non-White/White segregation has declined only slightly since 1990. Segregation increased between 1990 and 2000 but has since fallen below 1990 levels. Values in the Dissimilarity Index are lower in the region as a whole for non-White/White, Black/White, and Hispanic/White. Asian and Pacific Islanders are slightly more segregated in the region as a whole than in LA City.

In 1990, the Black/White Dissimilarity Index indicated very high levels of segregation. The Black/White Dissimilarity Index declined by the most of any racial or ethnic group since 1990 although Blacks remain the most segregated group in the City. The decline of the Black/White dissimilarity index is likely due to the overall decline of the Black population in LA since 1990.

The Hispanic/White Dissimilarity Index increased from 1990 to 2000 in both the City and the broader region, likely due to increased immigration from Latin America during the 1990s. The Hispanic/White

Dissimilarity Index has fallen slightly since 2000. However, segregation between Hispanics and Whites remains above 1990 levels and is troublingly high.

The Asian and Pacific Islander/White Dissimilarity Index was moderate in 1990 and has declined steadily since then in LA City. In the broader region, the pattern for Asians and Pacific Islanders is less clear as the Asian or Pacific Islander/White Dissimilarity Index increased between 1990 and 2000 but has since declined. However, the Asian or Pacific Islander Dissimilarity index in 2010 remains above the 1990 index value. This may be due to an influx of Asians into areas outside of the City such as the San Gabriel Valley. Asians and Pacific Islanders continue to experience the lowest levels of segregation among all non-White racial or ethnic groups.

Several significant demographic shifts have occurred since 1990. Within LA City, one of the most notable changes since 1990 has been the influx of Hispanics into South LA from well-established Hispanic neighborhoods to the north and east. Many Hispanics were drawn to the area due to its relatively affordable housing stock and lack of crowding compared to traditional gateway neighborhoods.¹⁶ At the same time, many Black residents left South LA for outlying areas such as Palmdale and Lancaster, as well as Victorville and Moreno Valley in the Inland Empire, particularly in the 1990s as high crime and decreased employment opportunities made South LA less appealing.¹⁷ As a result, the percentage of Black residents in many neighborhoods in South LA, historically a majority Black area, has declined and South LA now has a population that is majority Hispanic.

The number of Hispanic residents in Koreatown and the northeastern San Fernando Valley has also increased. More Asian residents have moved into the San Fernando Valley and West LA since 1990. There has also been an increase in the number of Asian residents in the San Gabriel Valley and the Palos Verdes peninsula. Gentrification has also led to an increase in White residents in neighborhoods such as Downtown and Echo Park.

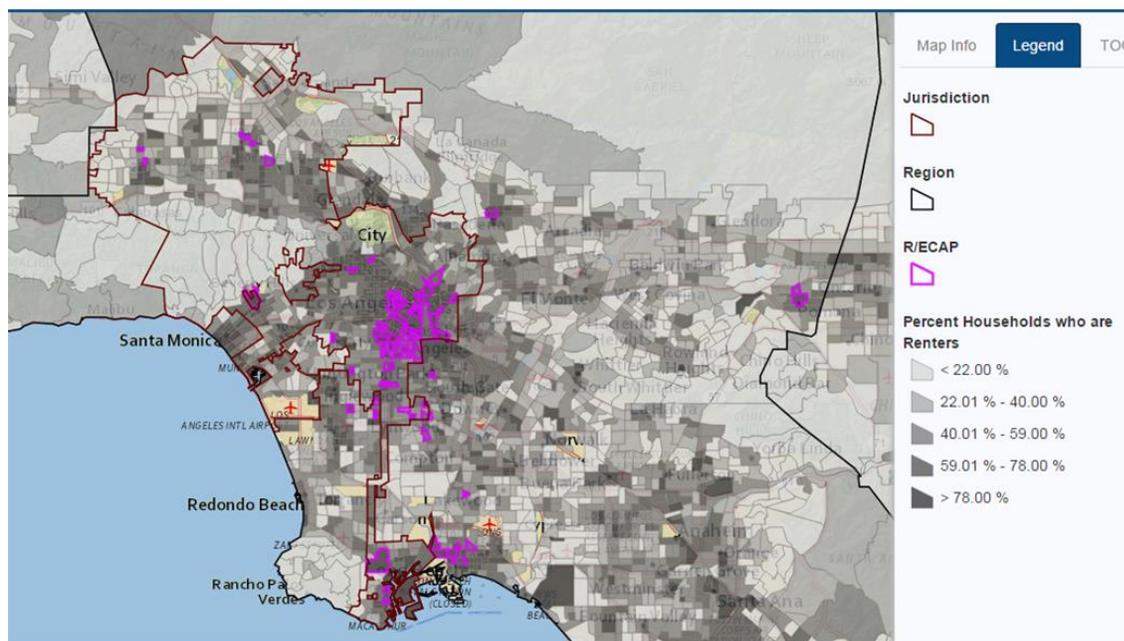
¹⁶Center for the Study of Immigrant Integration, *Roots Races: Latino Engagement, Place identities, and Shared Futures in South Los Angeles*, October 2016,

http://dornsife.usc.edu/assets/sites/731/docs/RootsRaices_Full_Report_CSII_USC_Final2016_Web_Small.pdf.

¹⁷Center for the Study of Immigrant Integration, *Roots Races: Latino Engagement, Place identities, and Shared Futures in South Los Angeles*, October 2016,

http://dornsife.usc.edu/assets/sites/731/docs/RootsRaices_Full_Report_CSII_USC_Final2016_Web_Small.pdf.

Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

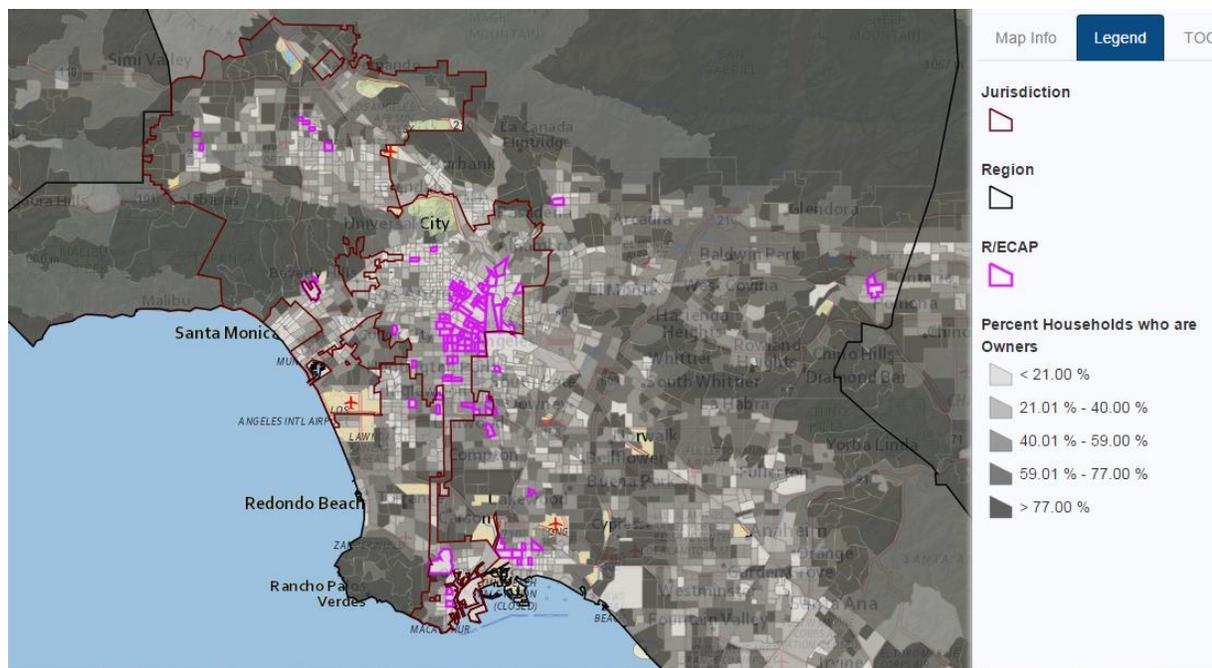


Nearly two-thirds of all households in LA rent their housing. Downtown and neighborhoods to the west of Downtown including Hollywood, Koreatown, Pico-Union, and the Westlake District have some of the highest rates of renter-occupied housing. Pico-Union and the Westlake District are relatively segregated while Downtown, Hollywood, and Koreatown are more integrated. North of Downtown, the relatively integrated areas of Echo Park and Silver Lake also have high numbers of renters.

Additionally, relatively integrated portions of the San Fernando Valley including North Hollywood, Van Nuys, and Canoga Park have high numbers of renters. Some segregated areas in the San Fernando Valley with a high number of renters include Sylmar and a portion of Sunland-Tujunga.

East LA, portions of the West LA including Palms and Sawtelle, South LA immediately surrounding the campus of USC, and San Pedro and Wilmington in the Harbor region also have high numbers of renters. Although nearly every R/ECAP in the City has high rates of renter occupied housing, exceeding that of the City as a whole and often over 78% (the highest category in Map 16 of the HUD AFFH Data and Mapping Tool), integrated sections of Central LA and West LA also have high proportions of renters.

Outside of the City, relatively segregated areas with high proportions of renter occupied housing include unincorporated East Los Angeles, many of the Gateway Cities, Santa Monica, Pomona, Santa Ana, Inglewood, Hawthorne, Redondo Beach, Hermosa Beach, Palmdale, Oxnard, and Santa Ana. These areas include heavily non-Hispanic White segregated areas, such as the Beach Cities, as well as predominantly minority areas. Relatively integrated urban centers such as Anaheim, Long Beach, Burbank, and Pasadena also have high rates of renter occupied housing.



Within LA City, owner occupied housing is most common in the San Fernando Valley and portions of West LA. Much of this owner occupied housing is located in predominantly White neighborhoods such as West Hills, Woodland Hills, Tarzana, and Encino. There are also heavily Hispanic neighborhoods in the Valley that have high rates of homeownership including Sylmar, Pacoima, and Sun Valley. Some neighborhoods that are relatively integrated and have high rates of homeownership in the Valley include Chatsworth and North Hills. The San Fernando Valley has a greater number of single family housing developments which contributes to higher rates of homeownership. Some portions of West LA that are overwhelmingly White such as Brentwood, Beverly Crest, Cheviot Hills, and Pacific Palisades have very high rates of homeownership. Many segregated areas in East LA and South LA also have rates of homeownership that exceed the citywide average. Outside of the City, Carson, Torrance, and much of the San Gabriel Valley are integrated areas with high ownership rates. Additionally, there are high rates of homeownership in the predominantly White cities of Malibu and Beverly Hills.

Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

One of the most noteworthy demographic trends is the continued growth of the Hispanic population. Hispanic residents made up approximately 40% of the City's population in 1990 but according to the American Community Survey, Hispanic residents were 48.7% of the Los Angeles population in 2015. The continued growth of the Hispanic population has had a significant effect in South LA where an influx of Hispanic individuals has taken place in neighborhoods that were once predominantly Black. As a result, South LA is nearly two-thirds Hispanic. Continued Hispanic population growth could lead to increased segregation in South LA neighborhoods. The Asian American and Pacific Islander population has also seen significant growth. Asian Americans and Pacific Islanders now make up 11.4% of the population in LA City, up from 9.8% in 1990. Outside of the City, there is a continuing influx of Asian residents into the San

Gabriel Valley and areas such as Cerritos while Hispanic population growth is steady in communities like Covina and Norwalk.

Immigration continues to play an important role in the region's demographics. Legal immigration to LA County has been steadily increasing since 2010 but the number of new immigrants remains significantly below the numbers seen in the 1990s and 2000s.¹⁸ In 2015, 53,241 individuals immigrated to LA County.¹⁹ Most immigrants to LA come from Latin America and Asia. In both the nation as a whole and California immigration from Asia has outpaced immigration from Latin America in recent years.²⁰ Statewide, 53% of immigrants who arrived in California between 2011 and 2015 came from Asia while 22% came from Latin America.²¹ New immigrants from Latin America and Asia may choose to settle into established ethnic enclaves and thus contribute to higher segregation.

In contrast to Hispanic and Asian population growth, the percentages of the population that are non-Hispanic White and Black, respectively, have declined. Non-Hispanic Whites made up 37% of the population in 1990 but now are approximately 28% of the city's population. Black residents once constituted 13% of the city's population but now comprise slightly less than 9% of the population.

Another important trend is the continued gentrification of neighborhoods such as Echo Park, Highland Park, Downtown, Koreatown, and the Oakwood section of Venice. Neighborhoods with transit access may be especially susceptible to gentrification. These include neighborhoods near the recently completed Expo Line such as Exposition Park, Jefferson Park, West Adams, and Baldwin Hills/Crenshaw. Home prices have already risen dramatically in Jefferson Park and West Adams in part because of the Expo Line.²² Researchers at University of California, Los Angeles (UCLA) and University of California Berkeley have found that between 2000 and 2013, neighborhoods accessible by transit generally experienced higher rents and increases in the White population, number of college-educated individuals, and number of higher income households compared to areas with more limited transit service.²³ Many other neighborhoods in desirable locations with relatively low housing costs are also likely to undergo gentrification, especially those in areas where transit service is set to expand. Gentrification may lead to short-term integration as more affluent, often White, residents move in to neighborhoods that have historically been predominantly home to lower-income residents of color. However, gentrification may also lead to long-term segregation as longtime residents of color are displaced by rising real estate prices. In particular, tenants of color may be disproportionately displaced as property values increase. Increased property values may lead to rising rents or prompt landlords to sell properties with affordable units to developers who renovate or demolish buildings to make way for new developments, thus leading to evictions.²⁴ On the other hand, gentrification

¹⁸ California Department of Finance, *Legal Immigration to California by County – 1984-2015*, December 2016, http://www.dof.ca.gov/Reports/Demographic_Reports/documents/Immigration_1984-2015w.xls.

¹⁹ California Department of Finance, *Legal Immigration to California by County – 1984-2015*, December 2016, http://www.dof.ca.gov/Reports/Demographic_Reports/documents/Immigration_1984-2015w.xls.

²⁰ Pew Research Center, Key findings about U.S. immigrants, May 2017, <http://www.pewresearch.org/fact-tank/2017/05/03/key-findings-about-u-s-immigrants/>

²¹ Public Policy Institute of California, *Immigrants in California*, January 2017, <http://www.ppic.org/publication/immigrants-in-california/>.

²² Los Angeles Times, *Home prices soar near USC as flippers and developers rush to 'one of the best neighborhoods left*, September 2016, <http://www.latimes.com/business/la-fi-jefferson-park-flips-20160831-snap-story.html>.

²³ UCLA, Berkeley, Urban Displacement, <http://www.urbandisplacement.org/map/la#>.

²⁴ Los Angeles, *Highland Park renters feel the squeeze of gentrification*, December 2014, <http://www.latimes.com/business/realestate/la-fi-highland-park-renters-20141221-story.html>.

may benefit homeowners of color who gain financially from increased home prices, potentially leading to tensions between renters who are less financially secure and homeowners who may support investment that enhances property values and home equity. Neighborhoods with higher rates of renter-occupied housing may thus be more likely to experience disproportionate levels of displacement of lower-income residents of color and higher segregation.

Additional Information

Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

Religion

Approximately 65% of the City's population identifies as Christian. Catholicism is the single largest denomination and 32% of residents identify as Catholic. Another 18% identify as Evangelical Protestant, 9% of residents identify as mainline Protestant, and 3% identify as historically Black Protestant.

Jewish residents are the largest non-Christian religious group in the Los Angeles area and make up about 3% of the area population. Jews have historically been concentrated in the Fairfax district and in the San Fernando Valley. Jewish residents have also established synagogues and schools in Pico-Robertson and Faircrest Heights.

A recent study of LA County residents found that 2% of residents are Muslims. A survey of Islamic mosques shows that they are concentrated in Central and South LA, particularly in Koreatown and Downtown.

Another 2% of LA County residents identify as Buddhist. Traditionally, Little Tokyo has been one of the centers of the Buddhist community. Thai Town and Koreatown are also bastions of Buddhist practice.

In recent years, an increasing number of Jewish residents have left the Fairfax district in favor of Pico-Robertson, La Brea/Beverly, or the San Fernando Valley.²⁵ Longtime Japanese residents in Little Tokyo have been increasingly displaced by new development, and the Buddhist population has likely declined.

The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

The City has made extensive place-based investments in R/ECAPs in order to increase economic mobility and access to opportunity for residents. These investments have included local economic development and infrastructure investments with the potential to lift residents out of poverty as well as investments in affordable housing in R/ECAPs located in transit corridors that may be on the brink of rapid gentrification. The latter investments have the potential to ensure that longtime residents enjoy the benefits of increased access to opportunity as their neighborhoods experience reinvestment.

²⁵ Los Angeles Times, *On Fairfax, the old Jewish scene and the new streetwear scene form an only-in-L.A. melting pot*, October 2016, <http://www.latimes.com/local/lanow/la-me-fairfax-changes-20160920-snap-story.html>.

Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

Community opposition

Community opposition is a significant contributing factor to segregation in LA City and the broader region. In recent years, community opposition has played a role in hindering the development of high-density or affordable housing, both of which are disproportionately occupied by people of color. Salient examples of Not in My Backyard (NIMBY) activism include community opposition against a new zoning plan for Hollywood that would have allowed for the construction of buildings with greater density and height, especially around transit areas. Studies have shown that density restrictions are a key cause of social fragmentation of metropolitan areas and appear to lead to the segregation of the affluent, not the poor.²⁶

In San Pedro, a neighborhood with a disproportionately high non-Hispanic White population, a proposal for a 1,900-unit development on former naval housing land with affordable units for moderate-income households faced significant community opposition. In its approved form, it will comprise only 676 units, with nearly a third of the units designated as single-family homes. Such incidences of NIMBYism are particularly resonant in LA City against the historical backdrop of many residents' opposition to school desegregation. Ultimately, public backlash against integration culminated in the 1979 enactment of Proposition 1, which limited mandatory student busing and reassignment to only those situations where it was necessary to remedy intentional segregation. However, there are encouraging signs of progress. Measure S, a ballot initiative that would have placed a two-year moratorium on developments requiring zoning changes that increase building density or height, was soundly defeated at the polls with 68.8% of voters opposing the measure. Had it been approved; this measure would have stymied the development of new affordable housing units encouraged by Measure JJJ.²⁷

Displacement of residents due to economic pressures

Displacement of residents due to economic pressures is a significant contributing factor to creating and perpetuating R/ECAPs in LA City and the broader region. Over the last decade, the City has faced a serious affordable housing crisis that was, in part, caused by decades of insufficient housing production, particularly in predominantly non-Hispanic White, high opportunity areas. Mayor Garcetti has made housing production and affordability a key part of his "pLAN" for the City, including developing 100,000 new housing units as well as preserving and building 15,000 affordable units by 2021. However, some observers believe that the 100,000 planned units may not be enough to meet demand and slow rent increases. Also, many landlords that offer affordable units do so as a condition under contracts they may sign with the City or as part of a requirement to secure approval for the development of a project. When

²⁶ Michael C. Lens & Paavo Monkkonen (2016) Do Strict Land Use Regulations Make Metropolitan Areas More Segregated by Income?, *Journal of the American Planning Association*, 82:1, 6-21, DOI: 10.1080/01944363.2015.1111163.

²⁷ Measure JJJ requires the provision of affordable housing when residential projects with 10+ units receive one of the 3 concessions listed below resulting in density above 35% or the granting of a residential use where said use did not exist before:

- a) General Plan amendment
- b) Zone Change
- c) Height District change

On-Site Affordable Housing is required in the following manner: 5% ELI and 6% VLI or 5% ELI and 15% LI*

an affordable housing restriction contract expires, landlords, would in effect be able to turn affordable units into more profitable, market-rate housing. As a result, the worst-case scenario is that as many as nearly 12,000 affordable units will be converted to market rate by 2021, although a significant percentage of these units are subject to HUD annual renewals, the state of federal funding consistently puts all these units at risk of expiring.

Also, unless steps are taken to mitigate the effects of development on low-income renters of color, the City's development strategies could have unintended consequences. For example, a disproportionate share of the City's new permitting has been concentrated in areas near Downtown and in transit corridors, areas that have limited though increasing overlap with high opportunity areas.²¹ As public transportation into West LA and the Valley through the Expo Line and the Red Line has increased new construction in high opportunity areas, steps must be taken to ensure that new development is both available to members of protected classes and spread widely across the City, including in West LA and Valley neighborhoods not served by new transit lines. To address the displacement pressures due to economic activity, the City adopted the Transit Oriented Community Affordable Housing Incentive Program (TOC program) guidelines in September 2017 as a required component of the voter approved Measure JJJ in November 2016. The TOC program seeks to fulfill the promise of Measure JJJ to create more affordable and mixed-income housing near transit, while minimizing impacts to the existing built character of the City's diverse neighborhoods. The program guidelines are based on the City's existing Density Bonus program, and correspond to the specific affordability requirements outlined in Measure JJJ. The TOC Guidelines specify the land use incentives, including increased density and floor area, are to be granted to projects depending how close they are to different types of transit stops and the percentage of required affordable units to be included in the projects. The TOC Program supports important objectives around equity, growth, and sustainability and seeks to help address City's housing crisis in a way that is both meaningful and consistent with the City's core planning principles. Most significantly, the TOC program will create affordable housing units for extremely low-income households in large and mixed-use projects along transit and high opportunity areas of the City with no public subsidy.

In addition, the City is currently pursuing the adoption of two critical land use policies to both incentivize and further expedite the development of affordable housing. These include the Value Capture and Permanent Supportive Housing proposed ordinances. The Permanent Supportive Housing proposed ordinance (PSH), would ensure that PSH units go through a consolidated planning process and that public funds, which are often dedicated for these developments, are efficiently utilized to facilitate the production of PSH units throughout the City. Through this ordinance the planning approval process would be consolidated to cut down on the overall development timeline, while incorporating new standards intended to reflect the unique characteristics of PSH and enhance the overall design of PSH projects. Further, per State law in California SB 2 (2007), PSH projects are required to be treated the same as any residential use in the same zone. This means that PSH projects can be built anywhere a multifamily residential building is allowed under the Zoning Code. The proposed ordinance does not change where PSH units are currently allowed in the city. To be eligible for project streamlining and the incentives provided by the draft ordinance, Qualified Permanent Supportive Housing Projects are required to be located near public transit. Once the PSH ordinance is adopted, Qualifying PSH projects will be eligible for an expedited public benefit application through the Department of City Planning's Priority Housing Project (PHP) Program. The goal of the PHP program will be to provide priority case processing for housing projects that include affordable housing, in order to cut down on the overall timeline and cost of securing planning entitlements.

The Value Capture proposed ordinance purposes is to clarify existing regulations and align affordability requirements across the range of planning entitlements that allow consideration of increased density or floor area ratio. A percentage of affordable housing will be required based upon the percent of density increase, across the range of City policies. The ordinance will result in an increase of affordable housing units developed, however any increase is expected to be relatively modest due to the relatively low level of applicable entitlement requests. The City does not expect major impacts to development patterns or individual project feasibility. Projects subject to the new requirements are all receiving significant density increases over that allowed by zoning and the requirements are designed to be in line with a proportional formula that has proven to be economically feasible under the density bonus program.

The above ordinances demonstrate the City's practice approach to both address existing barriers and create efficiencies and solutions to incentivize and expedite the development of affordable housing.

Also, when investments are made in majority-minority areas, the City must ensure that they do not displace current residents. For example, a UCLA study shows that White, college educated populations tend to move into areas with newly developed public transportation.²⁸ While this may create the appearance of integration, in order for integration to be stable, the relocation of non-Hispanic White households to neighborhoods with concentrations of Black and Hispanic renters must not result in the wholesale displacement of people of color from those communities. In Echo Park, many Hispanic families that have been living there for decades have been displaced due to increasing housing demand the neighborhood.²⁹ The increase in demand leads to increases in rent and property values, which makes finding replacement housing in a gentrifying neighborhood difficult. Similar trends are displacing residents across the City in neighborhoods like Mid-City, Westlake, Koreatown, northern neighborhood in South Los Angeles and near the University of Southern California and more.³⁰ When displaced minorities have no option but to move into predominately minority communities, segregation is perpetuated.

The City has taken positive steps to protect more vulnerable renters through, for example, stricter enforcement of the Ellis Act provisions to ensure any new development does not substantially reduce the stock of affordable housing and by passing a series of measures to track and preserve affordable housing. The City has also created a Rent Registry Program requiring landlords to provide the rent amount for every rental unit subject to the Rent Stabilization Ordinance (RSO). Additionally, the City Council approved an amendment to the RSO requiring that tenants receive notice prior to the execution of a "cash for keys" agreement to vacate an RSO rental unit. These measures may help lessen the greater economic pressure faced by tenants in communities of color that make them vulnerable to displacement as a result of economic pressures.

Additional measures include the Transit Oriented Communities Affordable Housing Incentive Program (TOC Program), which will create affordable units near transit; the Unimproved Dwelling Unit (UDU) ordinance, which creates a process by which certain illegal housing units in multi-family buildings can be brought into compliance and maintained as affordable housing; and the Accessory Dwelling Unit (ADU) ordinance, which permits landlords to get approval for bootlegged apartments if they guarantee affordable

²⁸ UCLA, Berkeley, Case Studies, <http://www.urbandisplacement.org/case-studies/ucla>.

²⁹ Los Angeles Times, *After 31 years in Echo Park, victims of displacement by gentrification*, March 2015, <http://www.latimes.com/local/california/la-me-0315-lopez-echo-20150313-column.html>.

³⁰ Curbed Los Angeles, *This map shows where gentrification is happening across Los Angeles*, August 2016, <https://la.curbed.com/2016/8/30/12712942/gentrification-map-los-angeles-county>.

housing on the site. Measure HHH, which commits \$1.2 billion for permanent supportive housing and a proposed Affordable Housing Linkage Fee, which could bring in \$100 million per year designated for affordable housing, are also expected to increase the affordable housing stock.

Lack of community revitalization strategies

The lack of community revitalization strategies is a significant contributing factor to the perpetuation and creation of R/ECAPs in LA City and the broader region. Without revitalization strategies, it is difficult for low-income, high-minority neighborhoods to attract more economic and social opportunities. In turn, the lack of opportunities has a twofold effect: residents of R/ECAPs have greater difficulty attaining economic mobility, and residents on the higher end of the income spectrum are not drawn to R/ECAPs. Encouragingly, the City has made some recent efforts to revitalize communities. However, the measures it has taken are not comprehensive enough to resolve longstanding problems. One key component of the lack of revitalization strategies is the absence of an overarching redevelopment plan. After the Community Redevelopment Agency of the City of LA (CRA/LA) was shuttered by state law in 2012, the City voted not to absorb the CRA into a City function. This decision deprived many neighborhoods of funding that would have spurred development, as in Boyle Heights, where the CRA/LA had planned to invest more than \$5 million to create new sidewalks, street lighting, and curb extensions. The City is still committed to fulfilling any contractual obligations it undertook when the CRA/LA was active, but its successor board does not seem to have undertaken new projects of a similar scale or type as its predecessor.

To compensate for the loss of the CRA/LA, the City has undertaken several new initiatives to continue its work in a piecemeal fashion. For example, the 2016 Great Streets Challenge grant winners include Pacoima, a high-minority population neighborhood whose funding for improved streets had been cut in the aftermath of the CRA/LA's dissolution. The Los Angeles Housing and Community Investment Department's Consolidated Plan for 2013-2017 also committed to a place-based strategy to encourage revitalization, especially through transit corridors. The subsequent annual action plans include budgets for various projects, such as City Trees and the Neighborhood Improvement Fund, but do not contain tangible metrics of success. Despite these revitalization plans, there remains many neighborhoods with high-minority and high-poverty populations that have not been included in any specific plans for revitalization. These neighborhoods include areas such as Westlake, University Park, and South Park. In addition, the City has undertaken planning efforts in South and Southeast Los Angeles as well as Boyle Heights designed to incentivize affordable and mixed-income housing around the area's thirty bus and rail transit stations and enable investment along miles of underserved commercial corridors.

Lack of private investments in specific neighborhoods

A lack of private investments is a significant contributing factor to segregation in the City of Los Angeles and the broader region. Specific neighborhoods with low-income, high minority populations have the greatest need for private investments to construct affordable housing, invest in new small businesses, and increase access to community amenities, such as supermarkets and banks. When assessing the various metrics that reflect lack of private investment in specific neighborhoods, it is indisputable that predominantly low-income, high minority communities suffer the greatest consequences and are often left without an opportunity for economic mobility. Generally, the distribution of community problems such as the lack of adequate housing, the lack of investments in small businesses, and the lack of access to community amenities, impedes economic mobility for low-income people of color and prevents them from accessing high opportunity areas, thus perpetuating segregation.

One indicator of the level private investment in specific neighborhoods is the issuance of building permits for new construction. Since January 2013, the LA Department of Building and Safety has issued 14,874 building permits for new construction, including 1,240 for commercial properties, 1,036 for apartment buildings with three or more units, and 12,598 for one or two family dwellings. The combined 2,276 permits for commercial properties and apartments are a useful proximity for private investment trends. The permitted properties are located in 113 zip codes, but nearly half of the properties (1,120) are located in just 24 zip codes that have had 30 or more such building permits. Of those 24 zip codes, none are located in East LA and just one (90011) is located in South LA. Neighborhoods in these sections of the City continue to experience the harmful effects of disinvestment. The problem of lack of private investment, however, is not consistent across all low-income communities of color in LA. Neighborhoods like Chinatown, Koreatown, the Westlake District, and Pico-Union are the sites of significant private investment.

A second metric is economic development that creates jobs and increases access to amenities such as supermarkets, pharmacies, and banks. R/ECAP neighborhoods in South Los Angeles, such as Watts have limited access to supermarkets, most of which are several miles away and only accessible with personal transportation.

The distribution of grocery stores, provides another lens through which to evaluate the effect of a lack of private investment in specific neighborhoods. Residents who live in neighborhoods located in South LA are disproportionately subjected to limited supermarket access. These populations overwhelmingly include high percentages of low income Hispanic and Black residents. According to a report by researchers at Johns Hopkins University, "mostly [B]lack neighborhoods present 'a double disadvantage' in supermarket access." In fact, the study showed that Black neighborhoods with little poverty had fewer supermarkets, on average, than high-poverty white areas.² Due to their race and level of poverty, specific neighborhoods with large Black populations lack opportunities for healthy food options and decent wage paying jobs. As an urban sociologist at American University put it, "the systematic refusal of corporations and small businesses to invest more generally in some largely African American and Latino neighborhoods robs those communities of the employment and education opportunities, that, over time, encourage healthier eating and living." As a result, a lack of private investment in the form of access to supermarkets and healthy food chains, contribute to the perpetuation of segregated neighborhoods.

Additionally, access to banks is severely limited in R/ECAP neighborhoods, furthering the lack of opportunities to secure funding from global financial institutions that could have impactful results within R/ECAP neighborhoods. South Los Angeles is home to 16 banks, one of which being JPMorgan Chase. On January 23, 2014, JPMorgan Chase announced a \$7 million-dollar grant to four leading Community Development Financial Institutions (CDFIs). The grant is part of the foundation's new CDFI Collaboratives program, a \$33 million commitment to help CDFIs and small business lenders build capacity and to jumpstart job creation in low- and moderate-income communities in the Chase footprint. Neither South Los Angeles nor the City of Los Angeles was included in this important economic initiative, whereas Los Angeles County is home to 287 JPMorgan Chase Branches with \$27 billion dollars in deposit. The South Los Angeles study area has 4 branches with a total deposit base of \$201,507,000 according to the FDIC Summary of Deposits Report for the period ending June 30, 2013. When leading global financial institutions choose to privately invest into specific low-income communities such as South Los Angeles, positive economic and social results can be seen. Without private investment into the community, neighborhoods like Watts are left without access to traditional and largely affordable capital, and new businesses cannot

finance their growth or daily operations in a cost-effective manner. Thus, high minority populations are left in overwhelmingly segregated neighborhoods without opportunities for any upward economic mobility.

Lack of public investments in specific neighborhoods, including services or amenities

A lack of public investments is a significant contributing factor to segregation in LA City and the broader region. Neighborhoods with high minority populations have greater need for public investments to rehabilitate infrastructure and improve services such as sanitation and street maintenance. Generally, the concentration of community problems in these same neighborhoods, such as unpaved streets, low-performing schools, and faulty sidewalks, illustrates insufficient public investment and also corresponds to areas of heavy segregation. One metric for public investment is the condition of paved streets. In Watts, which ranks among the lowest in the City in income and in its population of White residents, there is a concentration of paved streets that are in poor condition. A similar condition exists in the Westlake District, another area with disproportionately high percentages of Hispanic and Asian populations. The distribution of low-performing schools also roughly coincides with the geographic spread of high-minority neighborhoods. According to a report by the California Office to Reform Education, at least two of the five worst-performing high schools were located in high-minority neighborhoods: David Starr Jordan Senior High in Watts and Dr. Maya Angelou Community High in South Park. A third metric is sidewalk condition. While bad sidewalks plague the entire city, as of 2015, the areas with the greatest number of complaints included Downtown and Boyle Heights, both majority-minority neighborhoods. Areas with similarly high numbers of complaints are clustered around neighborhoods that are majority-minority and have lower median incomes than other areas of the City. The City voted in 2016 to dedicate over a billion dollars to sidewalk repair, but it is too early to evaluate the success of that investment. Improvements such as these are vital to the effort to attract more diverse populations and thus, greater opportunities, in currently segregated neighborhoods.

Lack of regional cooperation

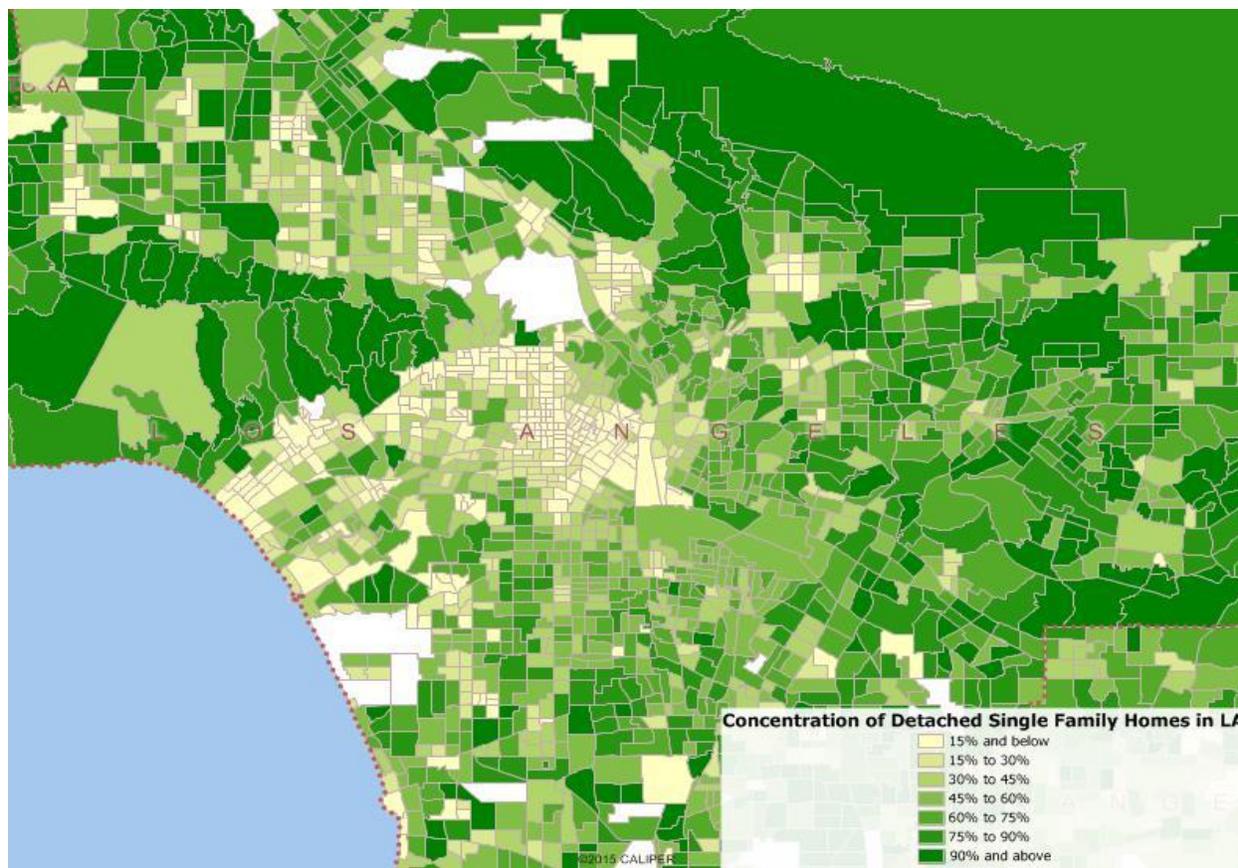
Lack of regional cooperation is a significant contributing factor to segregation in LA. Although jurisdictions have undertaken efforts at cooperation, reforms to land use and affordable housing investment in historically exclusionary suburban communities have not emerged. HCIDLA's predecessor agency, Los Angeles Housing Department (LAHD), in collaboration and participation with the Southern California Association of Governments (SCAG) as the lead applicant for the six-county region, applied to HUD for FY2011 Sustainable Communities Regional Planning Grant Program (SCRIP Grant). Los Angeles City, through LAHD as the lead for the Los Angeles County Region Consortium, played a critical role in the preparation of the application with partners at SCAG and the Los Angeles County Consortium for Sustainable and Equitable Communities (LA Consortium). The LA Consortium was comprised of LAHD; the Los Angeles Department of City Planning; the Los Angeles County Department of Regional Planning; the Los Angeles County Department of Public Health; LA Metropolitan Transportation Authority (Metro); Enterprise Community Partners; Reconnecting America, MoveLA; and the Low-Income Investment Fund and the California Community Foundation. The SCRIP's goals and objectives consisted of supporting metropolitan and multi-jurisdictional planning efforts that integrate housing, land use, economic and workforce development, transportation, and infrastructure investments in a manner that empowers jurisdictions to consider the interdependent challenges of: (1) economic competitiveness and revitalization; (2) social equity, inclusion, and access to opportunity; (3) energy use and climate change; and (4) public health and environmental impact.

Although SCAG, and the other partner departments/agencies were not awarded funding from HUD, HCIDLA continues to collaborate with the members of the LA County Region Consortium on other citywide Transit Oriented Development (TOD) related projects (i.e., pursue funding/grant options and legislative improvements). The LA Region could exponentially expand its collaborative impact with a comprehensive regional effort to understand the intersections of the region's disparate planning efforts (housing, land use, economic and workforce development and infrastructure investments).

Los Angeles County Metropolitan Transportation Authority (Metro) serves as the Los Angeles region's transportation planner and coordinator, designer, builder and operator for one of the country's largest, most populous counties. Elected Officials from regional jurisdictions serve on its Board of Directors.

Land use and zoning laws

Land use and zoning laws are a significant contributing factor to disproportionate housing needs in LA City and the broader region. Persons of color disproportionately occupy high-density housing, which can generally be built only in areas zoned for multi-family homes, multiple dwellings, or single-family homes on small lots. As the map below shows, some neighborhoods within LA have much higher concentrations of detached single-family homes than the City as a whole. In particular, neighborhoods in West LA and the San Fernando Valley that are adjacent to the Santa Monica Mountains have high concentrations of detached single-family homes at the census tract-level, sometimes exceeding 90%. These neighborhoods include parts of Bel Air, Brentwood, and Pacific Palisades in West LA and parts of Encino, Tarzana, and Woodland Hills in the Valley, among other areas. Such development patterns are influenced by a wide variety of factors but tend to overlap with residential zoning districts that are restricted to detached single-family homes. At the same time, much of Downtown and East LA, as well as parts of South LA that are relatively close to Downtown, have low concentrations of detached single-family homes. Exceptions to these general trends are numerous, and there are parts of West LA and the Valley that have multi-family housing, as well as parts of Downtown and East LA that have single-family homes. Nonetheless, strategically upzoning portions of communities in West LA and the Valley which are high opportunity areas near the Santa Monica Mountains would, by resulting in publicly-created value, incentivize property owners to develop multi-family housing. Where traditional multi-family housing is not feasible because of topography, increased density could take the form of two to four unit dwellings that are designed similarly to single-family homes. Montgomery County, Maryland has successfully integrated affordable housing into what are otherwise detached single-family neighborhoods by having developers include duplexes that resemble single-family homes. That development could potentially contribute to a more balanced housing stock in those neighborhoods and would create opportunities to foster residential integration within those neighborhoods, which are heavily non-Hispanic White. Increased integration would be particularly likely to result if affordable housing was provided on-site at new multi-family developments in those neighborhoods.



In 2016, a public referendum, Measure JJJ or the “Build Better LA” initiative passed with 65% of voters approving. Measure JJJ requires that rental projects that receive more than a 35% increase in density provide at least 5% of the total number of units at rents affordable to extremely low-income households, plus either 6% of units to very low-income households or 15% of units to lower-income households. Measure JJJ allows developers to meet the affordable housing requirements by building units on site, building units off-site, acquiring and preserving existing at-risk affordable properties, or paying an in-lieu fee. The in-lieu fee amount specified in Measure JJJ is equal to 1.1 times the number of affordable units that the developer would otherwise be required to provide, multiplied by an “affordability gap”. The high in-lieu fees of approximately \$45,000-\$55,000 per unit depending on size may promote more on-site affordable housing development leading to more mixed income housing opportunities in the City. However, the “in-lieu” option has shortcomings and may allow developers to concentrate affordable housing in already segregated areas whereas affordable housing would have to be provided on-site if there was no in-lieu fee option. Finally, multiple dwelling zones, like one-family dwelling zones, require a set-aside of parking spaces based on the number of habitable rooms in the zone. Given that households below the poverty line are proportionally less likely to use a car to commute to work, these parking space requirements may hinder the development of larger multi-family projects. Re:code LA, an initiative to revise LA’s zoning code, is considering altering parking requirements based on the context of the zone.

The City has also worked within the confines of unfavorable court decisions to foster the development of affordable housing through inclusionary zoning. Although the City had been barred from mandating the inclusion of affordable rental units in residential developments by a judicial decision, the City uses its Density Bonus program to incentivize the inclusion of affordable rental units by permitting developers to

set aside units for affordable housing by allowing greater density. The City also created an Expedited Permitting Section in its Department of City Planning to facilitate affordable housing development.

On September 29, 2017, the Governor signed A.B. 1505, which authorizes cities and counties to adopt an inclusionary ordinance for residential rental units to increase affordable housing. The City is expected complete an analysis of the potential for stronger inclusionary housing set-aside requirements and make recommendations to the City Council over the next three to five years.

Lending discrimination

Lending discrimination negatively affects the ability of people of color to access mortgages and other loan products on equal terms. Discriminatory practices have been widely used by large banks within Los Angeles for decades. In the wake of the foreclosure crisis, LA City took action against lending discrimination and filed suit against major national banks including JPMorgan Chase, Wells Fargo, and Citigroup. Specifically, the City alleged in complaints that banks use a combination of predatory lending practices in violation of the Fair Housing Act. Banks engage in traditional redlining by denying credit to borrowers of color on equal terms in certain neighborhoods and engage in reverse redlining by inundating communities of color with exploitative loan products. People of color in Los Angeles are less likely to receive credit than Whites and when they are issued credit, they are more likely to have loans with onerous terms.³¹ As a result, borrowers of color are more likely to have high risk mortgage loans that they cannot afford and that have a higher chance of default. The number of foreclosures in neighborhoods of color in LA is therefore excessive and disproportionately high. Foreclosures cost the City hundreds of millions of dollars in lost tax revenue and more than one billion dollars in spending on increased police and emergency calls, property maintenance, and inspections. Concentrated foreclosures in neighborhoods of color inflict serious damage on communities.

Lending discrimination is widespread. For example, in 2016, the California Reinvestment Coalition and Fair Housing Advocates of Northern California filed a complaint with the U.S. Department of Housing and Urban Development (HUD) against OneWest Bank, based in Pasadena, for allegedly discriminating against Black, Asian American, and Latino borrowers seeking home mortgages and other types of loans and for underserving people of color by locating disproportionately fewer branch locations in communities of color in Southern California. Home Mortgage Disclosure Act (HMDA) data from 2015 also reveals that racial disparities persist in lending in the Los Angeles metropolitan area. Hispanic, Black, and Asian American applicants in the Los Angeles housing market are denied conventional home loans at higher rates than Whites. While 9.9% of White applicants were denied conventional loans, 11.1% of Asian American applicants were denied, 12.9% of Hispanic applicants were denied, and 16.6% of Black applicants were denied loans. Another analysis of HMDA data from 2012-2014 found that Black residents received only 4% of home mortgage loan originations in Los Angeles County despite making up 8% of the County's population while Hispanics received 29% of all home mortgage originations despite making up 45% of the county's population. Additionally, Black and Hispanic borrowers in California are much more likely than White or Asian borrowers to receive government-backed loans with higher costs regardless of income.

³¹ United States District Court Central District of California, City of Los Angeles versus JP Morgan Chase & Co; JP Morgan Chase Bank and Chase Manhattan Bank USA, First Amended Complaint for Violation of the Federal Fair Housing Act, Case Number 2:14-cv-04168-ODW-RZ, <https://www.clearinghouse.net/chDocs/public/FH-CA-0015-0003.pdf>.

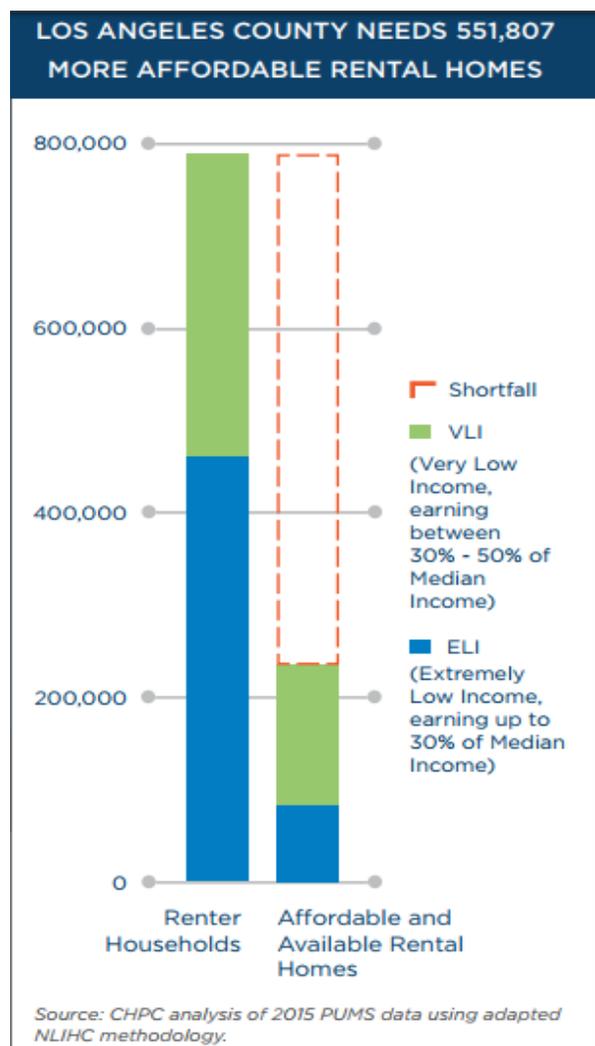
These lending practices affect the ability of people of color to live in high opportunity neighborhoods and to build wealth. Such practices can therefore perpetuate segregation.

Location and type of affordable housing

The location and type of affordable housing is a contributing factor to segregation in LA. As discussed elsewhere in this AFH, widespread single-family zoning and community opposition prevents affordable multi-family housing from being built in most parts of the City thus contributing to segregation by race and income. In addition, the location of affordable housing helps to perpetuate racial segregation. Among LA County housing submarkets, average rents are lowest in South LA and Koreatown-Mid City, areas with large populations of color, and are highest in largely White West LA.

Maps from the HUD data and mapping tool indicate that all forms of publicly supported housing including Low-Income Housing Tax Credit properties, project-based section 8 properties, public housing units, and other multi-family units are more concentrated in less affluent communities in South LA, East LA, Central LA, and portions of the San Fernando Valley. Relatively little affordable housing is located in West LA. The siting of publicly supported housing can limit fair housing choice and contribute to segregation. The occupants of publicly supported housing are disproportionately members of protected classes. When housing is only available to them within communities of color, there are missed opportunities to foster integration in predominantly non-Hispanic White neighborhoods.

Loss of Affordable Housing



The deficit of affordable housing units contributes to segregation and R/ECAPs. Within LA City, the areas with the greatest housing burdens are in the San Fernando Valley, East LA, and South LA, in neighborhoods like Boyle Heights and South Los Angeles. These areas have higher minority populations, are more segregated, and have higher concentrations of R/ECAPs. In general, the City's segregated, heavily Non-Hispanic White areas have relatively low levels of housing cost burden. Also, although Asian and Pacific Islander residents have a relatively low rent burden overall, Koreatown, Chinatown, and Little Tokyo all have concentrations of foreign-born residents in areas of high housing cost burden.

Continued siting patterns of affordable housing risks further reinforcing segregation and R/ECAPs, since much of the affordable housing deficit has been in R/ECAPs and majority-minority neighborhoods. If new development is going to further the goals of fair housing and desegregation, measures must be taken to ensure that new development is both accessible and spread widely across the city.

Expiring affordability restrictions and covenants also lead to the loss of affordable housing in a manner that contributes to segregation because landlords are typically more likely to choose not to renew subsidy contracts when their properties are either located in high opportunity areas or rapidly gentrifying ones.

Occupancy codes and restrictions

Occupancy codes and restrictions are not a significant contributing factor to segregation in LA City and the broader region. The City's Municipal Code does not contain unusually restrictive occupancy codes.

Private discrimination

Private discrimination played a key role in creating segregation in LA and such discrimination continues to this day. According to a 2015 Annual Report by the California Department of Fair Employment and Housing, 374 complaints about housing were filed from Los Angeles County in 2015 and 72 complaints were filed from Orange County.³² Housing discrimination can take many forms. Renters of color may be less likely to receive information about available housing or be less likely to have opportunities to inspect available units. Homebuyers of color may be steered toward certain neighborhoods or be less likely to receive assistance regarding financing.

³² California Department of Fair Employment and Housing, 2016 Annual Report, June 2017, <https://www.dfeh.ca.gov/files/2016/09/DFEH-2015AnnualReport.pdf>.

Studies have confirmed that discrimination persists in the private housing market. Discrimination can lead to reduced access to housing and higher housing costs for individuals. For instance, researchers found in 2011 that Black renters in Los Angeles were significantly less likely to receive responses from landlords.³³ A 2012 HUD report found that White renters in LA were shown more units and were more likely to be told that rent is negotiable than Blacks.³⁴ In addition, Black renters paid higher move in costs and security deposits. Another study in 2012 concluded that Hispanic and Black homebuyers paid a statistically significant premium for housing in the Los Angeles metropolitan area compared to Whites who purchased comparable housing.³⁵

Another protected class that often experiences private discrimination when seeking housing is the transgender and gender non-binary community, especially transgender and gender non-binary people of color. Gender identity is a protected class under the California Fair Employment and Housing Act, and at least one federal court has held that discrimination on the basis of gender identity is sex discrimination in violation of the federal Fair Housing Act. Almost one quarter of transgender individuals nationwide reported experiencing some form of housing discrimination in 2015. Also, the housing needs of the transgender and gender non-binary community are particularly acute. Nearly one third of the transgender community reports having experienced homelessness at some point in their lives, and 12% report experiencing homelessness within the last year. Those who are experiencing homelessness are also far more likely to experience harassment and discrimination in shelters as well as on the street. On the whole, the transgender and gender non-binary population disproportionately faces poverty, barriers to healthcare, difficulty finding employment, and violent crime, and, as a result, is particularly vulnerable to housing issues and displacement. Transgender and gender non-binary people are far less likely to own homes and far more likely to have difficulty finding rental housing. In order to ensure that the needs of the transgender and gender non-binary community are being met, the City should mandate that all of its data collection, forms, and facilities are inclusive of all gender identities.

Several recent cases illustrate how housing discrimination affects Angelenos who belong to protected classes, particularly in the rental market. In 2009, the U.S. Department of Justice (DOJ) reached a settlement with a management company that owned over 5,000 apartments in LA County and discriminated against Black and Hispanic residents in Koreatown.³⁶ Additionally, a lawsuit was filed in 2016 against a landlord in Koreatown for allegedly using abusive and discriminatory tactics against Hispanics, individuals with mental disabilities, and families with children in an attempt to drive them out from rent-controlled units and replace them with wealthier tenants.³⁷ A 2016 study by the Urban Institute examining discrimination against families with children in rental markets found that familial status could affect the average size of units

³³ Do Landlords Discriminate in the Rental Housing Market? Evidence from an Internet Field Experiment in U.S. Cities, http://excen.gsu.edu/workingpapers/GSU_EXCEN_WP_2011-05.pdf.

³⁴ U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Housing Discrimination Against Racial and Ethnic Minorities*, 2012 https://www.huduser.gov/portal/Publications/pdf/HUD-514_HDS2012.pdf.

³⁵ National Bureau of Economic Research, *Estimating Racial Price Differentials in the Housing Market*, Working Paper 18069, May 2012, <http://www.nber.org/papers/w18069.pdf>.

³⁶ U.S. Department of Justice, *Justice Department Obtains Records \$2.725 Million Settlement of Housing Discrimination Lawsuit*, November 2009, <https://www.justice.gov/opa/pr/justice-department-obtains-record-2725-million-settlement-housing-discrimination-lawsuit>.

³⁷ Los Angeles Times, *Investment firm ousts mentally ill and Latino family to flip Koreatown buildings, lawsuit alleges*, November 2016, <http://www.latimes.com/local/lanow/la-me-ln-koreatown-evictions20161118-story.html>.

offered and rents quoted to testers in LA.³⁸ Discrimination by landlords can have a significant effect on whether members of protected classes have access to certain neighborhoods.

Source of income discrimination

Source of income discrimination significantly contributes to segregation in LA City and the broader region. Many Americans living in poverty or with disabilities rely on federal or state assistance, including rental assistance, for their income. Racial minorities, particularly Black and Hispanic populations, are more likely to experience poverty and therefore rely on these programs than their White counterparts. Source of income discrimination leads to segregation because those renters of color who rely on governmental assistance become more constrained in their housing options, are barred from neighborhoods where their source of income is not recognized, and can have trouble accessing housing at all.³⁹ Although California does have a law that bans source of income discrimination, in 2010 in *Sabi v. Sterling*, the California Court of Appeal for the Second District interpreted the law to not cover discrimination against households using Section 8 or Housing Choice Vouchers.⁴⁰ The rental listings on Craigslist sharply illustrate the impact of that decision; one search reveals more than 75 rental listings in central LA that specifically note that Section 8 applicants are not welcome and about 300 ads of this kind in the county at-large. Some landlords couch the language as “no third-party checks.”

The California State Senate has a bill pending (SB 1053) that would protect tenants who rely on Section 8 vouchers, but it has not passed yet.⁴¹ Elsewhere in California, Santa Clara County has banned Section 8 discrimination in its unincorporated areas, Santa Monica has passed a law prohibiting the practice in City limits,⁴² and San Jose is considering a similar measure.⁴³ However, LA City has no such protections in place today.

Without these protections, source of income discrimination propagates segregation in communities of color in LA City today. While the vast majority of census tracts in the City contain fewer than 50 households that rely on Section 8 Housing Choice Vouchers, census tracts with the highest concentrations of households receiving voucher assistance are located primarily in majority-minority areas.⁴⁴ Also, between 2000 and 2013, the number of households in the City receiving assistance from both programs decreased overall, a decline that was almost universal in majority White areas.⁴⁵ But, the few areas in which the number of households relying on federal assistance rose were mostly in majority-minority neighborhoods, resulting in a concentration of the lowest-income renters in majority-minority neighborhoods.⁴⁶ Because landlords in

³⁸ U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Discrimination Against Families with Children in Rental Housing Markets: Findings of the Pilot Study*, December 2016, <https://www.huduser.gov/portal/sites/default/files/pdf/HDSFamiliesFinalReport.pdf>.

³⁹ Affordable Housing Online, *Law Aims to End Section 8 Source of Income Discrimination*, March 2016, <https://affordablehousingonline.com/blog/law-aims-to-end-section-8-source-of-income-discrimination>.

⁴⁰ See *Sabi v. Sterling*, 183 Cal. App. 4th 916 (Cal. Ct. App. 2010)

⁴¹ Affordable Housing Online, *Law Aims to End Section 8 Source of Income Discrimination*, March 2016, <https://affordablehousingonline.com/blog/law-aims-to-end-section-8-source-of-income-discrimination>.

⁴² Legal Aid Foundation of Los Angeles, *Ordinance Prohibiting Discrimination Against Voucher Holders Upheld*, January 2017, <https://lafla.org/news/press-releases/ordinance-prohibiting-discrimination-against-voucher-holders-upheld/>.

⁴³ Next City, *San Jose Considers Outlawing Section 8 Discrimination*, May 2017, <https://nextcity.org/daily/entry/san-jose-section-8-discrimination-legal>.

⁴⁴ UCLA, Berkeley, Urban Displacement, <http://www.urbandisplacement.org/map/la>.

⁴⁵ UCLA, Berkeley, Urban Displacement, <http://www.urbandisplacement.org/map/la>.

⁴⁶ UCLA, Berkeley, Urban Displacement, <http://www.urbandisplacement.org/map/la>.

primarily White, high-income areas are able to refuse Section 8 vouchers, those neighborhoods have become more difficult to access by low-income people of color and thus acts as a barrier to integration.

ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

R/ECAPs are geographic areas with significant concentrations of poverty and minority populations.⁴⁷ HUD has developed a census-tract based definition of R/ECAPs. In terms of racial or ethnic concentration, R/ECAPs are areas with a non-White population of 50 percent or more. With regards to poverty, R/ECAPs are census tracts in which 40 percent or more of individuals are living at or below the poverty limit or that have a poverty rate three times the average poverty rate for the metropolitan area, whichever threshold is lower.⁴⁸

Where one lives has a substantial effect on mental and physical health, education, crime levels, and economic opportunity. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas.⁴⁹ Research has found that racial inequality is thus amplified by residential segregation.⁵⁰ Concentrated poverty is also associated with higher crime rates and worse health outcomes.⁵¹ However, these areas may also offer some opportunities as well. Individuals may actively choose to settle in neighborhoods containing R/ECAPs due to the availability of affordable housing and proximity to job centers.⁵² Ethnic enclaves in particular may help immigrants build a sense of community and adapt to life in the U.S. The businesses, social networks, and institutions in ethnic enclaves may help immigrants preserve their cultural identities while providing a variety of services that allow them to establish themselves in their new homes.⁵³ Overall, identifying R/ECAPs is important in order to better understand entrenched patterns of segregation and poverty.

Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

There are many areas within the City of Los Angeles that meet the criteria for R/ECAPs. The vast majority of these R/ECAPs are clustered in Central LA, South LA, and East LA. South LA accounts for a

⁴⁷ Office of the Secretary, HUD, *Affirmatively Furthering Fair Housing, Sections 5.160 through 5.180 appear at 80 FR 42363*, July 2015, <https://www.gpo.gov/fdsys/pkg/CFR-2016-title24-vol1/pdf/CFR-2016-title24-vol1-sec5-152.pdf>.

⁴⁸ U.S. Department of Housing and Urban Development, HUD Open Data for R/ECAP Tract Current and Historic, https://egis-hud.opendata.arcgis.com/datasets/320b8ab5d0304daaa7f1b8c03ff01256_0.

⁴⁹ National Bureau of Economic Research, *Where is the Land of Opportunity? The Geography of Intergenerational Mobility in the United States*, January 2014, <http://www.nber.org/papers/w19843.pdf>.

⁵⁰ http://www.equality-of-opportunity.org/images/nbhds_paper.pdfhttp://www.equality-of-opportunity.org/assets/documents/movers_paper2.pdf

⁵¹ Brookings Institute, *The Re-Emergence of Concentrated Poverty: Metropolitan Trends in the 2000s*, November 2011, <https://www.brookings.edu/research/the-re-emergence-of-concentrated-poverty-metropolitan-trends-in-the-2000s/>.

⁵² Center for the Study of Immigrant Integration, *Root Races: Latino Engagement, Place Identities, and Shared Futures in South Los Angeles*, October 2016, https://dornsife.usc.edu/assets/sites/731/docs/RootsRaices_Full_Report_CSII_USC_Final2016_Web_Small.pdf.

⁵³ Journal of Environmental Psychology, *Creating a Sense of Place: The Vietnamese-American and Little Saigon, 2000*, http://users.clas.ufl.edu/msscha/landarch/readings/res_report_qual_creating_sense_place.pdf.

particularly large proportion of City residents living in census tracts with extreme rates of poverty.⁵⁴ In 2010, 387,914 people lived in areas classified as R/ECAPs. This figure represented slightly more than 10% of the City's population as of that date.

In Central LA, there is a cluster of R/ECAPs in Downtown Los Angeles encompassing Skid Row and other areas. To the west of Downtown, there is a contiguous grouping of R/ECAPs in the Westlake District. There is also a significant grouping of R/ECAPs in Pico-Union. To the north of Downtown, a grouping of R/ECAPs is located in Elysian Park and Chinatown. In addition, there is a R/ECAP in East Hollywood in Little Armenia. Another R/ECAP in Hollywood lies immediately to the west of the Hollywood Forever Cemetery stretching east to Seward Street. This R/ECAP is bounded by Santa Monica Boulevard to the north and Melrose Avenue to the south. In South LA, there is a significant grouping of R/ECAPs surrounding the University of Southern California (USC) campus. These include R/ECAPs in the neighborhoods of Adams-Normandie, Exposition Park, and University Park. The adjacent neighborhoods of South LA, specifically south of I-10 and East of I-110, South Park, and Vermont Square also have R/ECAPs. Further south, there is a R/ECAP in Vermont-Slauson and a cluster of R/ECAPs in Vermont Knolls and Florence. An additional cluster of R/ECAPs is located in Watts and the adjacent neighborhood of Green Meadows. There is also one R/ECAP in Hyde Park and one R/ECAP in the Crenshaw area. In East LA, there is a R/ECAP located in Lincoln Heights and several R/ECAPs in Boyle Heights.

In the Harbor Region, there are several R/ECAPs. One R/ECAP covers parts of northern San Pedro, western Wilmington, and southern Harbor City. There are also additional R/ECAPs located in San Pedro.

There are also two R/ECAPs in West LA immediately to the west of UCLA's campus. One of these R/ECAPs is dominated by the Veterans Home of California and the VA Greater Los Angeles Healthcare Center. The boundaries of the other two R/ECAPs are made up of Gayley Avenue, Strathmore Drive, and Veteran Avenue. The concentration of poverty in the Westwood neighborhood is largely a reflection of the large student population at UCLA, many of whom receive financial support from their parents which is not reflected in the census data.⁵⁵

In the San Fernando Valley, there are two R/ECAPs located in North Hills while another R/ECAP is in Panorama City. There is also a R/ECAP in northeastern Van Nuys. An additional two R/ECAPs are located in the Canoga Park section of the Valley.

Outside of the City of Los Angeles, there is one R/ECAP in Pasadena. Two R/ECAPs are located in Pomona. There is one R/ECAP in Huntington Park, one in Lynwood bordering the City of Los Angeles, and one in central Compton. There are several R/ECAPs in Long Beach clustered next to Wilmington as well as one R/ECAP in the Harte neighborhood in northern Long Beach. There are three R/ECAPs located in Inglewood. In the Antelope Valley region of LA County, there is a grouping of R/ECAPs in central Palmdale and one R/ECAP in Lancaster.

⁵⁴ City of Los Angeles, *Health Atlas: Economic Conditions*, May 2013, http://healthyplan.la/wordpress/wp-content/uploads/2013/10/LA_Atlas_4_Economic_Conditions.pdf.

⁵⁵ City of Los Angeles, *Health Atlas: Economic Conditions*, May 2013, http://healthyplan.la/wordpress/wp-content/uploads/2013/10/LA_Atlas_4_Economic_Conditions.pdf.

In Ventura County, there is a grouping of R/ECAPs in Oxnard and western Ventura. There is also a R/ECAP in central Santa Paula. In Orange County, there are three R/ECAPs in Irvine corresponding to the campus of the University of California, Irvine (UCI).

Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

Table 1 R/ECAP Population by Race and Ethnicity – Los Angeles City

	Los Angeles	
R/ECAP Race/Ethnicity	Number	% of R/ECAP Population
Total Population in R/ECAPs	387,915	
Non-Hispanic White	19,302	4.98%
Black	55,502	14.31%
Hispanic	282,571	72.84%
Asian and Pacific Islander	25,171	6.49%
Native American	709	0.18%
Other, Non-Hispanic	1,058	0.27%

Table 2 R/ECAP Population by Race and Ethnicity – Los Angeles Metropolitan Area

	Los Angeles-Long Beach-Anaheim, CA Region	
R/ECAP Race/Ethnicity	Number	% of R/ECAP Population
Total Population in R/ECAPs	562,051	
Non-Hispanic White	34,911	6.21%
Black	77,656	13.82%
Hispanic	395,944	70.45%
Asian and Pacific Islander	44,800	7.97%
Native American	1,043	0.19%
Other, Non-Hispanic	1,455	0.26%

Table 3 Top National Origins for Individuals in R/ECAPs – Los Angeles City

	Los Angeles	
R/ECAP National Origin	Number	% of R/ECAP Population
Total Population in R/ECAPs	387,915	
Mexico	96,286	24.82%

	Los Angeles	
El Salvador	24,625	6.35%
Guatemala	20,289	5.23%
China (excluding Hong Kong and Taiwan)	5,850	1.51%
Korea	4,527	1.17%
Honduras	3,714	0.96%
Philippines	2,191	0.56%
Belize	2,032	0.52%
India	1,506	0.39%
Nicaragua	1,506	0.39%

Table 4 Top National Origins for Individuals Living in R/ECAPs – Los Angeles Metropolitan Area

	Los Angeles- Long Beach- Anaheim, CA Region	
R/ECAP National Origin	Number	% of R/ECAP Population
Total Population in R/ECAPs	562,051	
Mexico	138,110	24.57%
El Salvador	29,075	5.17%
Guatemala	22,964	4.09%
China (excluding Hong Kong and Taiwan)	6,958	1.24%
Korea	5,496	0.98%
Honduras	5,221	0.93%
Philippines	3,592	0.64%
Cambodia	3,378	0.60%
Vietnam	2,828	0.50%
Belize	2,199	0.39%

Hispanics make up a disproportionately large percentage of residents who reside in R/ECAPs compared to populations of the City and region as a whole. Hispanic residents comprise approximately 73% of all individuals living in R/ECAPs in the City and 70% of individuals in R/ECAPs regionally while making up approximately 48% of the City's population and 44% of the regional population. Black residents also constitute a disproportionate of R/ECAP residents in the City and the region. Black residents are approximately 9% of the City's population and 7% of the regional population but make up nearly 14% of residents within R/ECAPs. The share of Asian Americans and non-Hispanic Whites in R/ECAPs in the

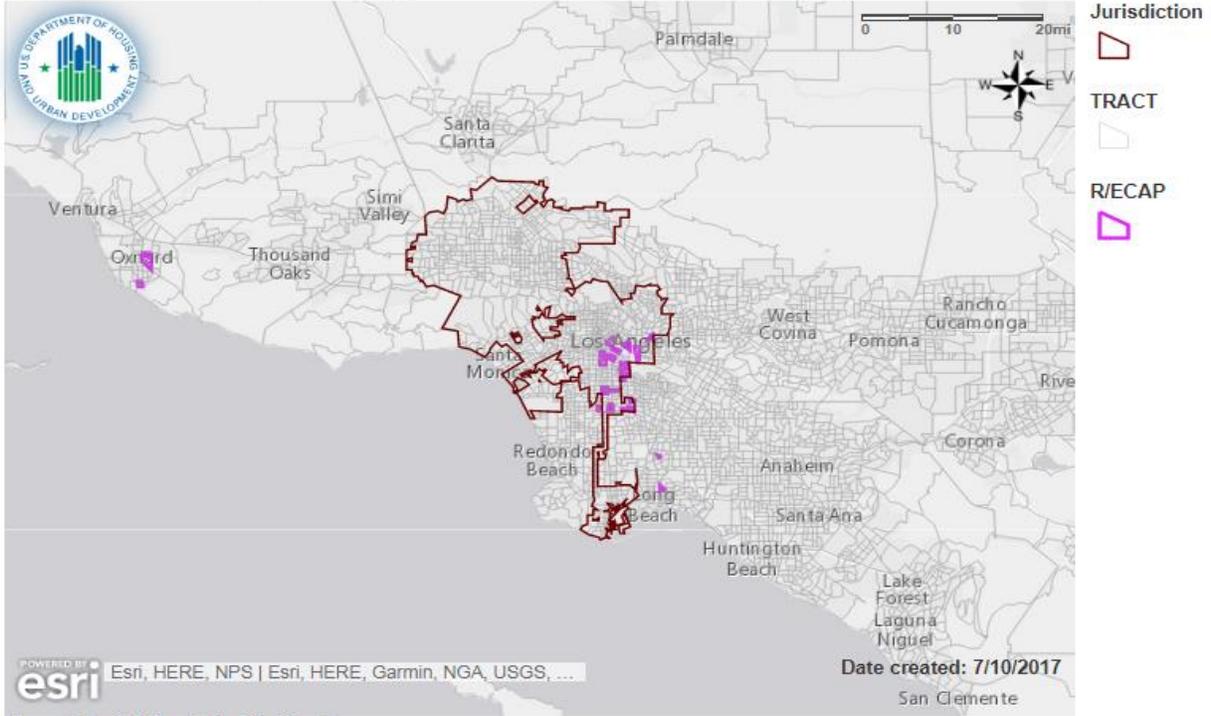
City and the region is smaller than the overall proportion of Asian Americans and non-Hispanic Whites in the City and the Region.

In terms of national origin, Mexicans disproportionately reside in R/ECAPs as do Hondurans, Salvadorans, Guatemalans, and Chinese individuals.

Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

Map 5 Los Angeles Metropolitan Area R/ECAPs 1990

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

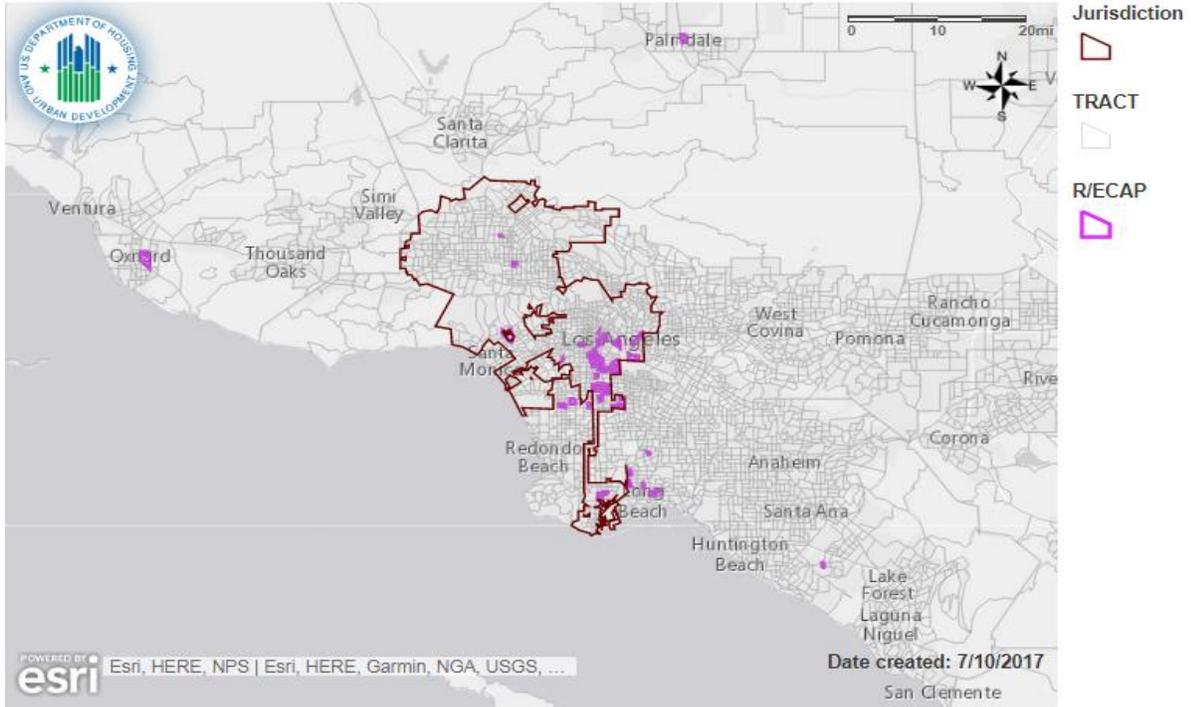
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Map 6 Los Angeles Metropolitan Area R/ECAPs 2000

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 2 - Race/Ethnicity Trends

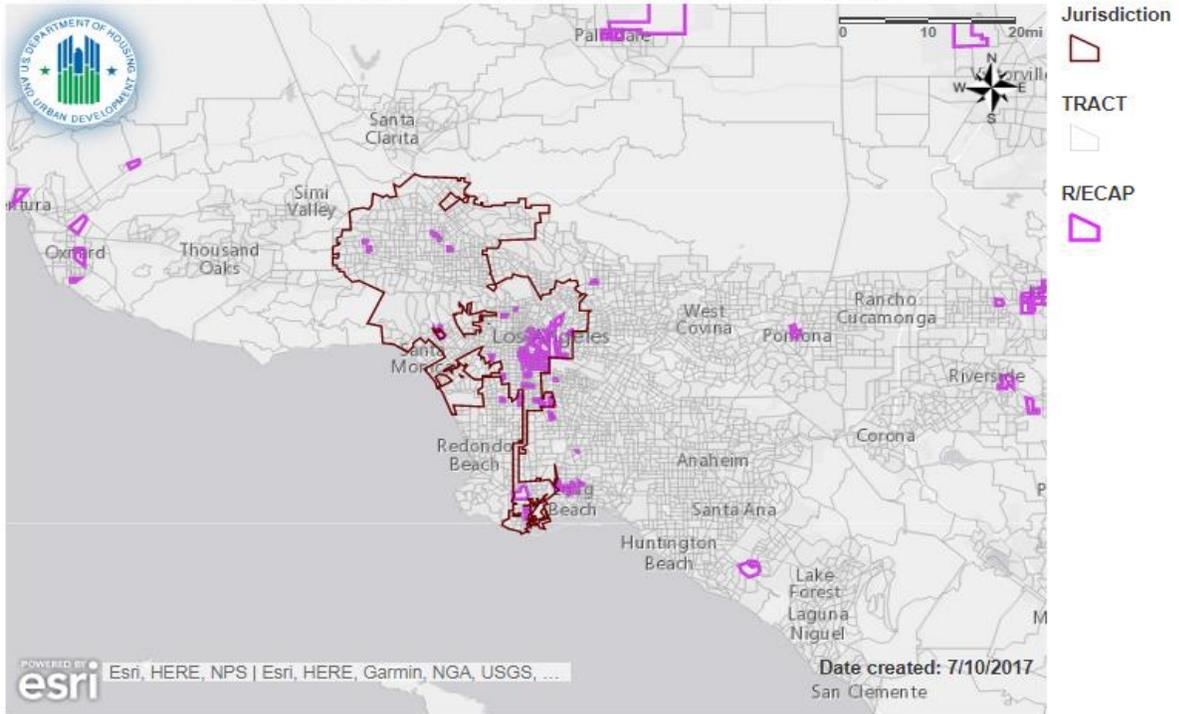
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Map 7 Los Angeles Metropolitan Area R/ECAPs 2010

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



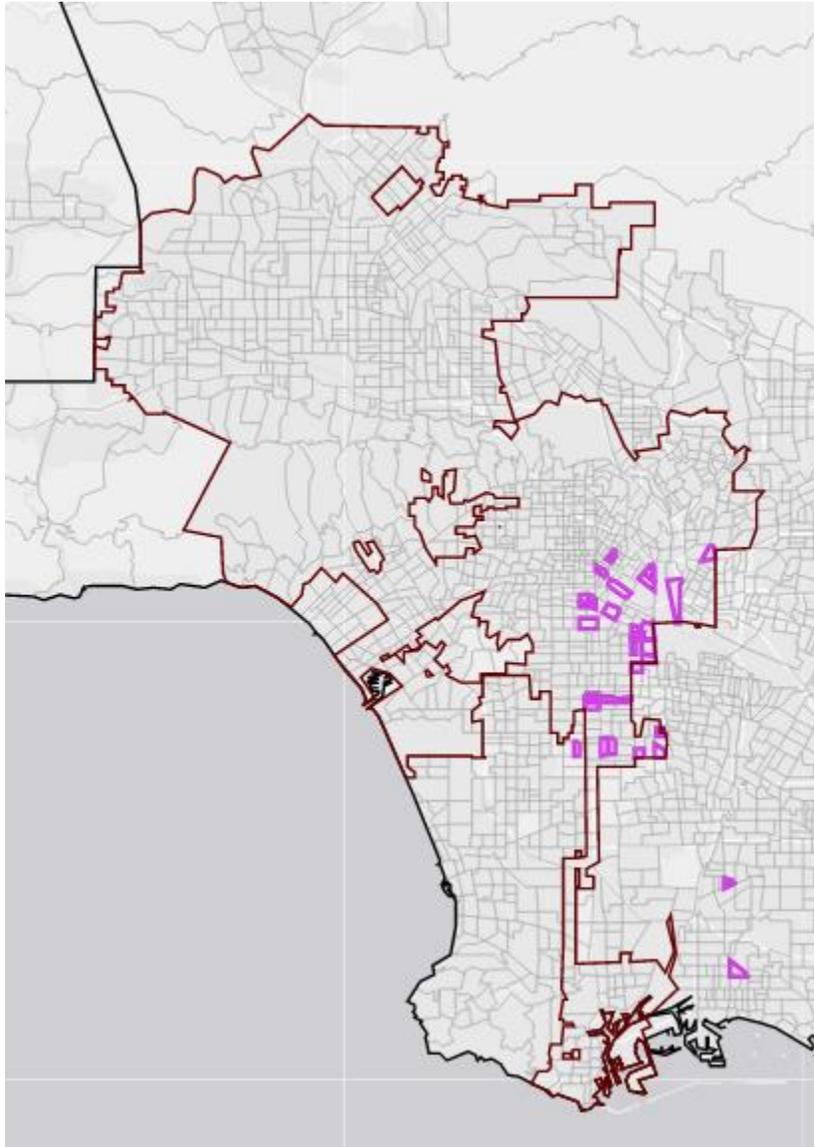
Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

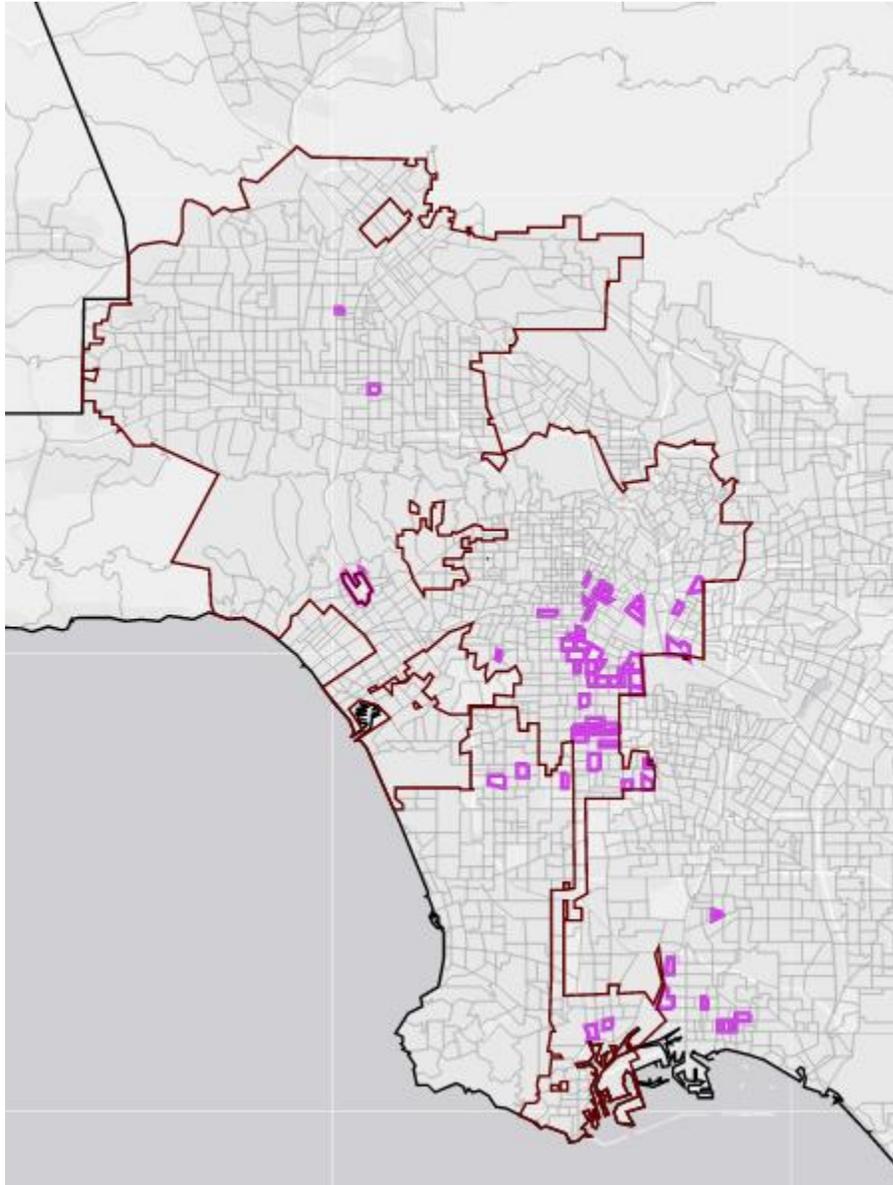
Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

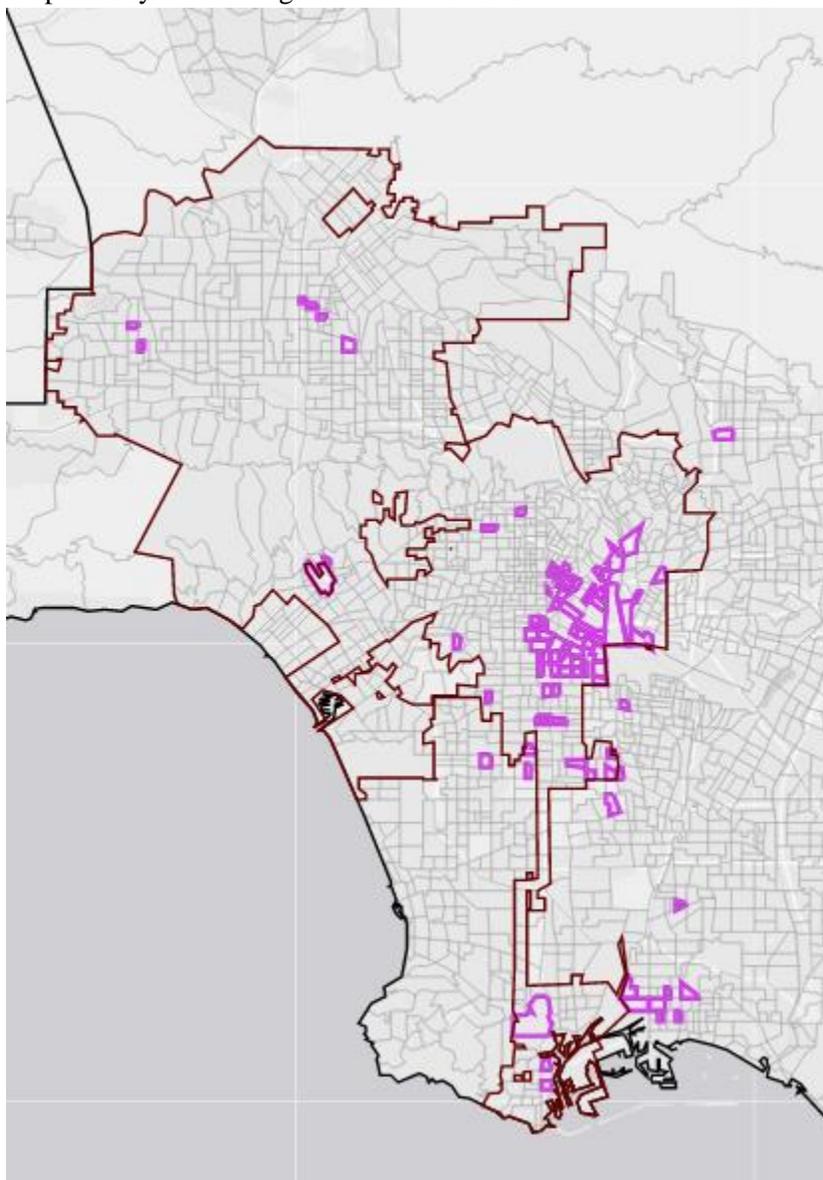
Map 8 City of Los Angeles R/ECAPs 1990



Map 9 City of Los Angeles R/ECAPs 2000



Map 10 City of Los Angeles R/ECAPs 2010



Over time, the number of R/ECAPs within the City and the region has increased. In 1990, nearly all regional R/ECAPs were located in the City. R/ECAPs were concentrated in the Central LA neighborhoods of Downtown, Pico-Union, and the Westlake District. In South LA, a cluster of R/ECAPs were located in Central-Alameda. Another cluster was located in University Park, Adams-Normandie, Historic South Central⁵⁶, and Exposition Park. Additional R/ECAPs were located in Watts, Broadway-Manchester, Vermont Knolls, and Florence. In East LA, two R/ECAPs were located in Boyle Heights. Outside of the City, scattered R/ECAPs were found in Oxnard and Long Beach.

By 2000, additional R/ECAPs developed in Wilmington in the Harbor region, Westwood, and in North Hills and Van Nuys in the San Fernando Valley. One census tract located in Downtown that was a R/ECAP

⁵⁶ Historic South Central a 2.25-square-mile district within South Los Angeles with a population of approximately 50,000 residents, according to the 2000 U.S. Census.

in 1990 was no longer considered a R/ECAP by 2000. New R/ECAPs emerged in the Westlake District and Pico-Union as well as in an area straddling Harvard Heights and Arlington Heights. More R/ECAPs also emerged in South LA in South Park and the Baldwin Hills/Crenshaw area. The number of R/ECAPs in Boyle Heights also increased. Outside of LA City, a cluster of R/ECAPs developed in Long Beach. Scattered R/ECAPs appeared in Lennox, Inglewood, Palmdale, and in Orange County, south of Irvine.

By 2010, new R/ECAPs emerged in Downtown, Chinatown, Elysian Park, and the Westlake District. New R/ECAPs also developed in San Pedro in the Harbor Region and Canoga Park in the San Fernando Valley. In addition, the number of R/ECAPs increased in South LA and Lincoln Heights in East LA. Regionally, new R/ECAPs emerged in Palmdale, Lancaster, Pasadena, Pomona, and Willowbrook, as well in Orange County, south of Irvine. One census tract in Harvard Heights/Arlington Heights and one in Lennox that were considered R/ECAPs in 2000 were no longer classified as R/ECAPs in 2010.

Additional Information

Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

In a manner that might not be apparent from HUD-provided data, some R/ECAPs near Downtown LA (and a smaller number elsewhere in the City), including in the Westlake District, Pico-Union, Koreatown, East Hollywood, Chinatown, and Boyle Heights, are either experiencing or are likely to experience rapid demographic change in the absence of additional policy interventions. In the process, these neighborhoods are likely to become more heavily non-Hispanic White and higher income. In the predominantly Hispanic Westlake District, for example, data from Zillow reflects that sale prices for newly constructed two-bedroom condominiums start in the high \$600,000s. Although reinvestment with the potential to ameliorate disparities in access to opportunity is accompanying these demographic changes, there is a substantial risk that these neighborhoods will resegregate as predominantly non-Hispanic White rather than experiencing stable integration. Additionally, as longtime residents are displaced from these neighborhoods, residential opportunities in high opportunity areas from which they have historically been excluded are generally not available. Displaced residents often have few choices outside of low-income communities of color in areas within the region that are more geographically remote.

The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

The City has made extensive place-based investments in R/ECAPs in order to increase economic mobility and access to opportunity for residents. These investments have included local economic development and infrastructure investments with the potential to lift residents out of poverty as well as investments in affordable housing in R/ECAPs located in transit corridors that may be on the brink of rapid gentrification. The latter investments have the potential to ensure that longtime residents enjoy the benefits of increased access to opportunity as their neighborhoods experience reinvestment.

Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

Community opposition

Community opposition is a significant contributing factor to the perpetuation and creation of R/ECAPs in the City of Los Angeles and the broader region. In recent years, community opposition has played a role in hindering the development of high-density or affordable housing, both of which are disproportionately occupied by people of color and lower-income households. Salient examples of Not-in-My-Back-Yard (NIMBY) activism include community opposition against a new zoning plan for Hollywood that would have allowed for the construction of buildings with greater density and height, especially around transit areas. Much of the development that community opponents have opposed, however, has lacked a substantial affordable component.

In San Pedro, a neighborhood with a disproportionately high non-Hispanic White population, a proposal for a 1,900-unit development on former naval housing land with affordable units for moderate-income households faced significant community opposition. In its approved form, it will comprise only 676 units, with nearly a third of the units designated as single-family homes. It is difficult to track the relocation of affordable housing developments originally slated to be built in higher-opportunity neighborhoods. However, researchers have noted that community opposition against inclusive housing can both exacerbate and create new R/ECAPs.

In a December 2016 study issued by the University of California Center Sacramento, the author noted that community opposition is a significant policy issue because “not building housing in some parts of the City pushes the pressure for development, along with any negative impacts, to neighborhoods with fewer resources to resist.” The tide may finally be turning. Measure S, a ballot initiative not supported by the City that would have placed a two-year moratorium on developments requiring zoning changes that increase building density or height was soundly defeated at the polls. Had it been passed, it would have become more difficult for affordable housing developers to build in typically higher-opportunity, lower-density neighborhoods.

Deteriorated and abandoned properties

Deteriorated and abandoned properties contribute to the creation and entrenchment of R/ECAPs in the City of Los Angeles and the broader region. The problem of abandoned properties in Los Angeles became especially acute in the wake of the 2008 financial crisis when many foreclosed-upon properties sat vacant and unattended for months or even years. Abandoned properties are not only a sign of a distressed community; they also depress property values, attract criminal activity, and pose risks to the health and welfare of neighbors. In Los Angeles, the impact of these foreclosures was especially intense in South LA, East LA, and parts of the San Fernando Valley,⁵⁷ communities with large numbers of non-White residents

⁵⁷ Los Angeles Times, *Blighted home linger in L.A., frustrating neighbors*, June 2014, <http://www.latimes.com/business/la-fi-foreclosure-registry-20140610-story.html>.

and higher concentrations of R/ECAPs. Neighbors living next to foreclosed-upon vacant properties were exposed to biohazards,⁵⁸ waste dumping, drug use, and illegal gambling.⁵⁹

Congress authorized the creation of the Neighborhood Stabilization Program (NSP) through the Housing and Economic Recovery Act of 2008 to provide funds to municipalities to mitigate the adverse effect of concentrated foreclosure activity in communities. The third and final round of funding for NSP was provided in 2010. LA City was a recipient of NSP funds for all three funding rounds, and the eventual elimination of this funding stream has adversely affected the City's ability to address the lingering impact of the foreclosure crisis.

The City attempted to address this problem in 2010 by creating a Foreclosure Registry Program in an attempt to impose fines on owners of vacant properties. However, the City had issues funding the project, found enforcement to be nearly impossible,⁶⁰ and never collected a single fine.⁶¹ After an audit of the program, in 2014 the City Council amended the registry program to assess a prospective registration fee and streamline the inspection process.⁶² Since then, the City has also successfully undertaken an effort to keep better track of foreclosed upon properties and created a mapping tool, which illustrates where these properties are located across the City. Around the same time, the City also sued Deutsche Bank and U.S. Bank, two of the banks that owned many foreclosed properties in LA, for allowing their properties to fall into disrepair, creating "slumlike conditions" in primarily majority-minority neighborhoods. The suits resulted in two settlements, one with U.S. Bank in 2013 for \$10 million and the other with Deutsche Bank in 2016 for \$13.5 million.⁶³ In 2015, the City also approved a new program to dispose of abandoned and deteriorated properties by placing into a receivership, having a municipal employee or contractor supervise the necessary repairs, selling the property, and using the proceeds to fund the program.⁶⁴ However, this program is modest. While there are more than 32,000 blighted vacant properties across the City, this program only started with 25 properties.⁶⁵ LA's Housing and Community Investment Department (HCIDLA), which runs the Foreclosure Registry Program as well as the renovation project, has had significant difficulty implementing programs to prevent foreclosures. For example, the Housing Finance Innovation Fund, created in 2011 with \$5 million in grant funding to provide loan assistance, could not find banks to partner with, missed its progress milestones, and was forced to return the grant. Similarly, the City-Sponsored Foreclosure Prevention Program provided \$1.1 million in funds for loan assistance, but the City and Bank of America, which partnered to implement the program, could not identify any borrowers who were eligible for assistance. In 2016, the Department recommended moving away from foreclosure prevention and requested funding for programming aimed at

⁵⁸ Los Angeles Times, *Blight moves in after foreclosures*, 2017, <http://www.latimes.com/la-fi-vacant28aug28-story.html>.

⁵⁹ Los Angeles Times, *Los Angeles approves program to fix up and sell bank-owned nuisance properties*, December 2015, <http://www.latimes.com/business/la-fi-feuer-nuisance-properties-20151211-story.html>.

⁶⁰ Curbed Los Angeles, *US Bank will pay \$13.5 million for letting LA homes sit empty for years*, September 2016, <https://la.curbed.com/2016/9/29/13114164/foreclosure-us-bank-blight-homes-los-angeles>.

⁶¹ Curbed Los Angeles, *LA hasn't collected a single fine on blighty foreclosed houses*, June 2014, <https://la.curbed.com/2014/6/4/10091534/la-hasnt-collected-a-single-fine-on-blighty-bankowned-houses>.

⁶² Housing + Community Investment Department, City of Los Angeles, Online Foreclosure Registry, <http://hcidlabill.lacity.org/Foreclosure/Public/Login.aspx?ReturnUrl=%2FForeclosure>.

⁶³ Los Angeles Times, *U.S. Bank to pay L.A. \$13.5 million over foreclosed homes that fell into disrepair*, September 2016, <http://www.latimes.com/business/la-fi-feuer-foreclosure-settlement-20160929-snap-story.html>.

⁶⁴ Los Angeles Times, *Los Angeles approves program to fix up and sell bank-owned nuisance properties*, December 2015, <http://www.latimes.com/business/la-fi-feuer-nuisance-properties-20151211-story.html>.

⁶⁵ Los Angeles Times, *Los Angeles approves program to fix up and sell bank-owned nuisance properties*, December 2015, <http://www.latimes.com/business/la-fi-feuer-nuisance-properties-20151211-story.html>.

making foreclosed upon houses accessible to low- and moderate-income families. However, this plan does not appear to be moving forward.

In addition to abandoned built properties, Los Angeles also has a fair number of vacant lots – particularly in the San Fernando Valley and South LA, where some lots have been unoccupied since the Watts Rebellion of 1965.⁶⁶ These lots are unsightly and unproductive, a drag on the neighborhoods where they are located, collecting trash and potentially hazardous waste. R/ECAPs are far more likely to contain one or more vacant lots. South LA has almost 3,000 of these lots, compared to wealthier, Whiter areas like West LA, which has only 134, or Wilshire Miracle Mile, which has 310.⁶⁷

Displacement of residents' due to economic pressures

Displacement of residents' due to economic pressures is a significant contributing factor to creating and perpetuating R/ECAPs in LA City and the broader region. Over the last decade, the City has faced a serious affordable housing crisis that was, in part, caused by decades of insufficient housing production, particularly in predominantly non-Hispanic White, high opportunity areas. Mayor Garcetti has made housing production and affordability a key part of his “pLAn” for the City, including developing 100,000 new housing units as well as preserving and building 15,000 affordable units by 2021. However,⁶⁸ some observers believe that the 100,000 planned units may not be enough to meet demand and slow rent increases. Also, many landlords offer affordable units only because they are obligated to under the contracts they sign with the City when new projects are being developed. When those contracts expire, landlords will be able to turn affordable units into more profitable, market-rate housing. As a result, the worst-case scenario is that as many as 15,000 affordable units will be converted to market rate by 2021 although it is expected that a significant percentage of these units will receive annual renewals.⁶⁹

Also, unless additional steps are taken to mitigate the effects of development on low-income renters of color, the City's development strategy could have unintended consequences. For example, a disproportionate share of the City's new permitting has been concentrated in areas near Downtown and in transit corridors, areas that have limited though increasing overlap with high opportunity areas.²¹ As public transportation into West LA and the Valley through the Expo Line and the Red Line has increased new construction in high opportunity areas, steps must be taken to ensure that new development is both available to members of protected classes and spread widely across the City, including in West LA and Valley neighborhoods not served by new transit lines.

Also, when investments are made in majority-minority areas, the City must ensure that they do not displace current residents. For example, a University of California Los Angeles (UCLA) study shows that White, college educated populations tend to move into areas with newly developed public transportation. While this may create the appearance of integration, in order for integration to be stable, the relocation of non-Hispanic White households to neighborhoods with concentrations of Black and Hispanic renters must not result in the wholesale displacement of people of color from those communities. In Echo Park, many

⁶⁶ Curbed Los Angeles, *Los Angeles's tens of thousands of vacant lots mapped*, May 20105, <https://la.curbed.com/2015/5/4/9964284/los-angeles-vacant-lots-map>.

⁶⁷ KPCC Public Radio, *Groups work to turn South LA lots into children's playgrounds*, April 2015, <http://www.scpr.org/news/2015/04/30/50927/groups-work-to-turn-south-la-lots-into-children-s/>.

⁶⁸ City of Los Angeles, *The pLAn*, April 2015, <http://plan.lamayor.org/portfolio/housing-and-development/>.

⁶⁹ KPCC Public Radio, *What happens when LA's affordable housing contracts expire?* August 2015, <http://www.scpr.org/news/2015/08/03/53498/affordable-housing-disappearing-as-contracts-expir/>.

Hispanic families that have been living there for decades have been displaced due to increasing demand to move into the neighborhood. Similar trends are displacing residents across the City in neighborhoods like Mid-City, Westlake, and more. When displaced low-income people of color are forced into more affordable, relatively high poverty areas, R/ECAPs emerge.

The City has taken positive steps to protect more vulnerable renters through, for example, stricter enforcement of the Ellis Act provisions to ensure any new development does not substantially reduce the stock of affordable housing and passing a series of measures to track and preserve affordable housing. The City has also created a Rent Registry Program requiring landlords to provide the rent amount for every rental unit subject to the Rent Stabilization Ordinance (RSO). Additionally, the City Council approved an amendment to the RSO requiring that tenants receive notice prior to the execution of a “cash for keys” agreement to vacate an RSO rental unit. These measures may help lessen the greater economic pressure faced by tenants in communities of color that make them vulnerable to displacement as a result of economic pressures.

Lack of community revitalization strategies

A lack of community revitalization strategies is a significant contributing factor to the perpetuation and creation of R/ECAPs in LA City and the broader region. Without revitalization strategies, it is difficult for low-income, high-minority neighborhoods to attract more economic and social opportunities. In turn, the lack of opportunities has a twofold effect: residents of R/ECAPs have greater difficulty attaining economic mobility, and residents on the higher end of the income spectrum are not drawn to R/ECAPs. Encouragingly, the City has made some recent efforts to revitalize communities. However, the measures it has taken are not comprehensive enough to resolve longstanding problems. One key component of the lack of revitalization strategies is the absence of an overarching redevelopment plan. After the Community Redevelopment Agency of the City of LA (CRA/LA) was shuttered by state law in 2012, the City voted not to absorb the CRA into a City function. This decision deprived many neighborhoods of funding that would have spurred development, as in Boyle Heights, where the CRA/LA had planned to invest more than \$5 million to create new sidewalks, street lighting, and curb extensions. The City is still committed to fulfilling any contractual obligations it undertook when the CRA/LA was active, but its successor board does not seem to have undertaken new projects of a similar scale or type as its predecessor.

To compensate for the loss of the CRA/LA, the City has undertaken several new initiatives to continue its work in a piecemeal fashion. For example, the 2016 Great Streets Challenge grant winners include Pacoima, a high-minority population neighborhood where funding for improved streets had been cut in the aftermath of the CRA/LA’s dissolution. HCIDLA’s Consolidated Plan for 2013-2017 also committed to a place-based strategy to encourage revitalization, especially through transit corridors. The subsequent annual action plans include budgets for various projects, such as City Trees and the Neighborhood Improvement Fund, but do not contain tangible metrics of success. Despite these revitalization plans, there remain many neighborhoods with high-minority and high-poverty populations that have not been included in any specific plans for revitalization. These neighborhoods include areas such as the Westlake District, University Park, and South Park.

Lack of local or regional cooperation

Lack of regional cooperation is a significant contributing factor to R/ECAPs in Los Angeles. Although jurisdictions have undertaken efforts at cooperation, reforms to land use and affordable housing investment in historically exclusionary suburban communities have not emerged, and low-income people of color have

had few residential opportunities outside of R/ECAPs as a result. HCIDLA's predecessor agency, the Los Angeles Housing Department (LAHD), in collaboration and participation with the Southern California Association of Governments (SCAG) as the lead applicant for the six-county region, applied to the U.S. Department of Housing and Urban Development (HUD) for FY2011 Sustainable Communities Regional Planning Grant Program (SCRIP Grant). LA City, through LAHD as the lead for the Los Angeles County Region Consortium, played a critical role in the preparation of the application with partners at SCAG and the Los Angeles County Consortium for Sustainable and Equitable Communities (LA Consortium). The LA Consortium was comprised of LAHD; the Los Angeles Department of City Planning; the Los Angeles County Department of Regional Planning; the Los Angeles County Department of Public Health; LA Metropolitan Transportation Authority (Metro); Enterprise Community Partners; Reconnecting America, MoveLA; and the Low-Income Investment Fund and the California Community Foundation. The SCRIP's goals and objectives consisted of supporting metropolitan and multi-jurisdictional planning efforts that integrate housing, land use, economic and workforce development, transportation, and infrastructure investments in a manner that empowers jurisdictions to consider the interdependent challenges of: (1) economic competitiveness and revitalization; (2) social equity, inclusion, and access to opportunity; (3) energy use and climate change; and (4) public health and environmental impact.

Although SCAG, and the other partner departments/agencies were not awarded funding from HUD, HCIDLA continues to collaborate with the members of the LA County Region Consortium on other citywide TOD related projects (i.e., pursue funding/grant options and legislative improvements). The LA Region could exponentially expand its collaborative impact with a comprehensive regional effort to understand the intersections of the region's disparate planning efforts with regard to housing, land use, economic and workforce development, and infrastructure investments.

Metro serves as the Los Angeles region's transportation planner and coordinator, designer, builder and operator for one of the country's largest, most populous counties. Elected officials from regional jurisdictions serve on its Board of Directors.

Lack of private investments in specific neighborhoods

A lack of private investments is a significant contributing factor to the perpetuation and creation of R/ECAPs in LA City and the broader region. Without private investment to construct affordable housing and promote new businesses that lead to increased opportunities of decent paying jobs, it is challenging for low-income, high minority neighborhoods to acquire more economic opportunities for social mobility. As a result, a lack of opportunities constrains residents of R/ECAPs from economic mobility. When assessing the various metrics that reflect lack of private investment in specific neighborhoods, it is indisputable that predominantly low-income, high minority communities suffer the greatest consequences and are often left with limited opportunities for economic mobility. Generally, the distribution of community problems such as the lack of adequate housing, the lack of investments in small businesses, and the lack of access to community amenities, impedes economic mobility for low-income people of color and prevents them from accessing high opportunity areas, thus perpetuating segregation. One indicator of the level of private investment in specific neighborhoods is the issuance of building permits for new construction. Since January 2013, the LA Department of Building and Safety has issued 14,874 building permits for new construction, including 1,240 for commercial properties, 1,036 for apartment buildings with three or more units, and 12,598 for one or two-family dwellings. The combined 2,276 permits for commercial properties and apartments are a useful proximity for private investment trends. The permitted properties are located in 113 zip codes, but nearly half of the properties (1,120) are located in just 24 zip

codes that have had 30 or more such building permits. Of those 24 zip codes, none are located in East LA and just one (90011) is located in South LA. Neighborhoods in these sections of the City continue to experience the harmful effects of disinvestment. The problem of lack of private investment, however, is not consistent across all low-income communities of color in LA. Neighborhoods like Chinatown, Koreatown, the Westlake District, and Pico-Union are the site of significant private investment.

A second metric is economic development that creates jobs and increases access to amenities such as supermarkets, pharmacies, and banks. R/ECAP neighborhoods like Watts and Boyle Heights have limited access to supermarkets, most of which are several miles away and only accessible with personal transportation. The distribution of grocery stores, provides another lens through which to evaluate the effect of a lack of private investment in specific neighborhoods. Residents who live in neighborhoods located in South LA are disproportionately subjected to limited supermarket access. These populations overwhelmingly include high percentages of low income Hispanic and Black residents. According to a report by researchers at Johns Hopkins University, "mostly [B]lack neighborhoods present 'a double disadvantage' in supermarket access." In fact, the study showed that Black neighborhoods with little poverty had fewer supermarkets, on average, than high-poverty white areas. Due to their race and level of poverty, specific neighborhoods with large Black populations lack opportunities for healthy food options and decent wage paying jobs. As an urban sociologist at American University put it, "the systematic refusal of corporations and small businesses to invest more generally in some largely African American and Latino neighborhoods robs those communities of the employment and education opportunities, that, over time, encourage healthier eating and living." As a result, a lack of private investment in the form of access to supermarkets and healthy food chains, contribute to the perpetuation of segregated neighborhoods. Additionally, access to banks is severely limited in R/ECAP neighborhoods, furthering the lack of opportunities to secure funding from global financial institutions that could have impactful results within R/ECAP neighborhoods. South Los Angeles is home to 16 banks, one of which being JPMorgan Chase. On January 23, 2014, JPMorgan Chase announced a \$7 million-dollar grant to four leading Community Development Financial Institutions (CDFIs). The grant is part of the foundation's new CDFI Collaboratives program, a \$33 million commitment to help CDFIs and small business lenders build capacity and to jumpstart job creation in low- and moderate-income communities in the Chase footprint. Neither South LA nor the City of Los Angeles was included in this important economic initiative, whereas Los Angeles County is home to 287 JPMorgan Chase Branches with \$27 billion dollars in deposit. The South Los Angeles study area has 4 branches with a total deposit base of \$201,507,000 according to the FDIC Summary of Deposits Report for the period ending June 30, 2013. When leading global financial institutions choose to privately invest into specific low-income communities such as South Los Angeles, positive economic and social results can be seen. Without private investment into the community, neighborhoods like Watts are left without access to traditional and largely affordable capital, and new businesses cannot finance their growth or daily operations in a cost-effective manner. Thus, high minority populations are left in overwhelmingly segregated neighborhoods without opportunities for any upward economic mobility.

Lack of public investments in specific neighborhoods, including services or amenities

A lack of public investments is a significant contributing factor to the perpetuation and creation of R/ECAPs in the City of Los Angeles and the broader region. Without public investment to rehabilitate infrastructure and improve services, it is difficult for low-income, high-minority neighborhoods to attract more economic and social opportunities. In turn, the lack of opportunities has a twofold effect: residents of R/ECAPs have greater difficulty attaining economic mobility, and residents on the higher end of the income spectrum are

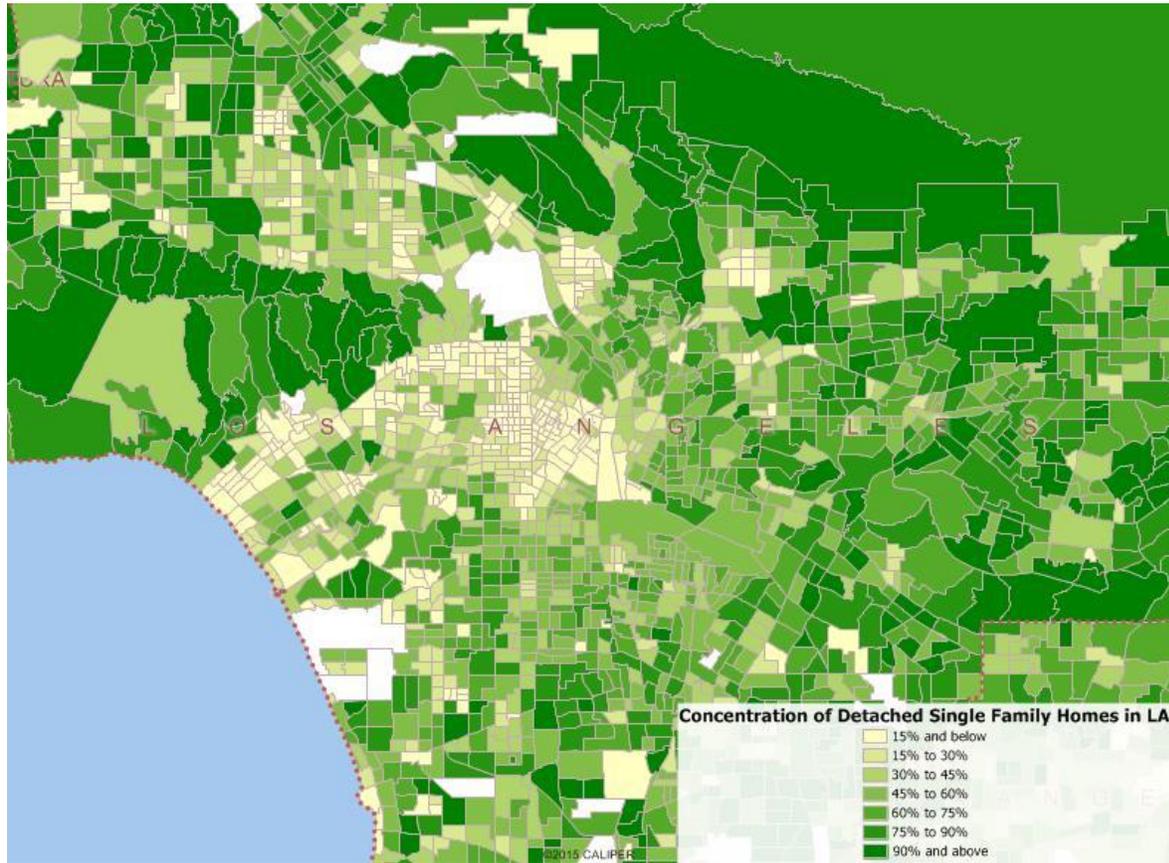
not drawn to R/ECAPs. Generally, the distribution of community problems, such as concentrations of unpaved streets, low-performing schools, and faulty sidewalks, serve as indicators of insufficient public investment and correspond with the distribution of R/ECAPs. Though for many years, HCIDLA and HACLA have funded affordable housing projects in R/ECAPs through the City’s AHTF Program and the TCAC funding source, funding Family Source Centers and other types of programs in R/ECAPs, by these “community problem” metrics, it is still clear that public investment remains insufficient in R/ECAPs, most of which are located in Central LA, East LA, and South LA. Dwindling CDBG allocations from the federal government have made it harder for HCIDLA to meet these infrastructure and public facilities challenges.

One important indicator of the adequacy of public investment is the condition of paved streets. In Watts, which ranks among the lowest in LA City in income and in its population of White residents, there is a concentration of paved streets that are in poor condition. A similar condition exists in the Westlake District, another area with disproportionately high percentages of Hispanic and Asian populations. The distribution of low-performing schools also roughly coincides with the geographic spread of R/ECAPs. According to a report by the California Office to Reform Education, at least two of the five worst-performing high schools were located in R/ECAPs: David Starr Jordan Senior High in Watts and Dr. Maya Angelou Community High in South Park. A third metric is sidewalk condition. While bad sidewalks plague the entire city, as of 2015, the areas with the greatest number of complaints included Downtown and Boyle Heights, both R/ECAPs. Areas with similarly high numbers of complaints are clustered around neighborhoods that are majority-minority and have lower median incomes than other areas of the City. The City voted in 2016 to dedicate over a billion dollars to sidewalk repair, but it is too early to evaluate the success of that investment.

Land use and zoning laws

Land use and zoning laws are a significant contributing factor to disproportionate housing needs in the City of Los Angeles and the broader region. Persons of color disproportionately occupy high-density housing, which can generally be built only in areas zoned for multi-family homes, multiple dwellings, or single-family homes on small lots. As the map below shows, some neighborhoods within LA have much higher concentrations of detached single-family homes than the City as a whole. In particular, neighborhoods in West LA and the San Fernando Valley that are adjacent to the Santa Monica Mountains have high concentrations of detached single-family homes at the census tract-level, sometimes exceeding 90%. These neighborhoods include parts of Bel Air, Brentwood, and Pacific Palisades in West LA and parts of Encino, Tarzana, and Woodland Hills in the Valley, among other areas. Such development patterns are influenced by a wide variety of factors but tend to overlap with residential zoning districts that are restricted to detached single-family homes. At the same time, much of Downtown and East LA, as well as parts of South LA that are relatively close to Downtown, have low concentrations of detached single-family homes. Exceptions to these general trends are numerous, and there are parts of West LA and the Valley that have multi-family housing, as well as parts of Downtown and East LA that have single-family homes. Nonetheless, strategically upzoning portions of communities in West LA and the Valley, which are high opportunity areas near the Santa Monica Mountains would, by resulting in publicly-created value, incentivize property owners to develop multi-family housing. Where traditional multi-family housing is not feasible because of topography, increased density could take the form of two to four unit dwellings that are designed similarly to single-family homes. Montgomery County, Maryland has successfully integrated affordable housing into what are otherwise detached single-family neighborhoods by having developers include duplexes that resemble single-family homes. That development would contribute to a more balanced housing stock in those neighborhoods and would create opportunities to foster residential integration within those neighborhoods, which are heavily non-Hispanic White. Increased integration

would be particularly likely to result if affordable housing was provided on-site at new multi-family developments in those neighborhoods.



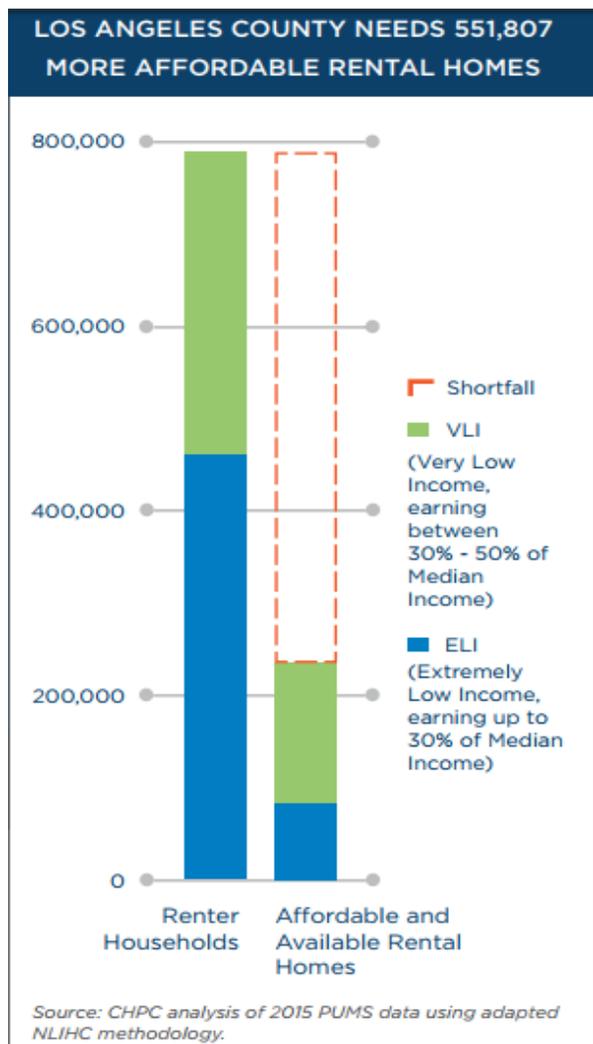
In 2016, a public referendum, Measure JJJ or the “Build Better LA” initiative passed with 65% of voters approving. Measure JJJ requires that rental projects that receive more than a 35% increase in density provide at least 5% of the total number of units at rents affordable to extremely low-income households, plus either 6% of units to very low-income households or 15% of units to lower-income households. Measure JJJ allows developers to meet the affordable housing requirements by building units on site, building units off-site, acquiring and preserving existing at-risk affordable properties, or paying an in-lieu fee. The in-lieu fee amount specified in Measure JJJ is equal to 1.1 times the number of affordable units that the developer would otherwise be required to provide, multiplied by an “affordability gap”. The high in-lieu fees may promote more on-site affordable housing development leading to more mixed income housing opportunities in the City. However, the “in-lieu” option has shortcomings and may allow developers to concentrate affordable housing in already segregated areas whereas affordable housing would have to be provided on-site if there was no in-lieu fee option. Finally, multiple dwelling zones, like one-family dwelling zones, require a set-aside of parking spaces based on the number of habitable rooms in the zone. Given that households below the poverty line are proportionally less likely to use a car to commute to work, these parking space requirements may hinder the development of larger multi-family projects. Re:code LA, an initiative to revise LA’s zoning code, is considering altering parking requirements based on the context of the zone.

The City has also worked within the confines of unfavorable court decisions to foster the development of affordable housing through inclusionary zoning. Although the City is barred from mandating the inclusion of affordable rental units in residential developments by a judicial decision, the City uses its Density Bonus program to incentivize the inclusion of affordable rental units. The City also created an Expedited Permitting Section in its Department of City Planning to facilitate affordable housing development.

Location and type of affordable housing

The location and type of affordable housing is a significant contributing factor to R/ECAPs. A majority of public housing units within the City are located in R/ECAPs. Reviewing HUD provided data in Figure 1 – Table 7 R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category, it is evident that Black and Hispanic households are over represented in public housing and in public housing units located in R/ECAPs. Other multifamily units are not as concentrated in R/ECAPs but a significant portion of such units are in R/ECAPs. Additionally, the percentage of units that are supported by Housing Choice Vouchers is high in many R/ECAPs, especially in South Los Angeles.

Loss of affordable housing



The deficit of affordable housing units contributes to segregation and R/ECAPs. Within the City of Los Angeles, the areas with the greatest housing cost burdens are in the San Fernando Valley, East LA, and South LA, in neighborhoods like Boyle Heights and Historic South Central. These areas have higher minority populations, are more segregated, and have higher concentrations of R/ECAPs. In general, the City's segregated, heavily Non-Hispanic White areas have relatively low levels of housing cost burden. Also, although Asian and Pacific Islander residents have a relatively low rent burden overall, Koreatown, Chinatown, and Little Tokyo all have concentrations of foreign-born residents in areas of high housing cost burden.

Continued siting patterns of affordable housing risk further reinforcing segregation and R/ECAPs, since much of the affordable housing deficit has been in R/ECAPs and majority-minority neighborhoods. If new development is going to further the goals of fair housing and desegregation, measures must be taken to ensure that new development is both accessible and spread widely across the City.

As part of Measure JJJ's community plan requirement, the plan must ensure that there is no loss of affordable housing units through transit-oriented development investments. The implementation of this

planning requirement will be important to efforts to reduce the loss of affordable housing.

Occupancy codes and restrictions

Occupancy codes and restrictions are not a significant contributing factor to the perpetuation and creation of R/ECAPs in the City of Los Angeles and the broader region. The City's Municipal Code does not contain unusually restrictive occupancy codes.

Private discrimination

Private discrimination is a contributing factor to the creation of R/ECAPs. According to a 2015 Annual Report by the California Department of Fair Employment and Housing, 374 complaints about housing were filed from Los Angeles County in 2015 and 72 complaints were filed from Orange County.⁷⁰ Housing discrimination can take many forms. Renters of color may be less likely to receive information about available housing or be less likely to have opportunities to inspect available units. Homebuyers of color may be steered toward certain neighborhoods or be less likely to receive assistance regarding financing.

⁷⁰ State of California, Department of Fair Employment and Housing, *2016 Annual Report*, June 2017, <https://www.dfeh.ca.gov/files/2016/09/DFEH-2015AnnualReport.pdf>.

Studies have confirmed that discrimination persists in the private housing market. Discrimination can lead to reduced access to housing and higher housing costs for individuals. For instance, researchers found in 2011 that Black renters in Los Angeles were significantly less likely to receive responses from landlords.⁷¹ A 2012 U.S. Department of Housing and Urban Development (HUD) report found that White renters in Los Angeles were shown more units and were more likely to be told that rent is negotiable than Black renters.⁷² In addition, Black renters paid higher move in costs and security deposits. Another study in 2012 concluded that Hispanic and Black homebuyers paid a statistically significant premium for housing in the Los Angeles metropolitan area compared to Whites who purchased comparable housing.⁷³

Another protected class that often experiences private discrimination when seeking housing is the transgender and gender non-binary community, especially transgender and gender non-binary people of color. Gender identity is a protected class under the California Fair Employment and Housing Act, and at least one federal court has held that discrimination on the basis of gender identity is sex discrimination in violation of the federal Fair Housing Act. Almost one quarter of transgender individuals nationwide reported experiencing some form of housing discrimination in 2015. Also, the housing needs of the transgender and gender non-binary community are particularly acute. Nearly one third of the transgender community reports having experienced homelessness at some point in their lives, and 12% report experiencing homelessness within the last year. Those who are experiencing homelessness are also far more likely to experience harassment and discrimination in shelters as well as on the street. On the whole, the transgender and gender non-binary population disproportionately faces poverty, barriers to healthcare, difficulty finding employment, and violent crime, and, as a result, is particularly vulnerable to housing issues and displacement. Transgender and gender non-binary people are far less likely to own homes and far more likely to have difficulty finding rental housing. In order to ensure that the needs of the transgender and gender non-binary community are being met, the City should mandate that all of its data collection, forms, and facilities are inclusive of transgender and gender non-binary identities.

Several recent cases illustrate how housing discrimination affects Angelenos who belong to protected classes, particularly in the rental market. In 2009, the U.S. Department of Justice (DOJ) reached a settlement with a management company that owned over 5,000 apartments in Los Angeles County and discriminated against Black and Hispanic households in Koreatown.⁷⁴ Additionally, a lawsuit was filed in 2016 against a landlord in Koreatown for allegedly using abusive and discriminatory tactics against Hispanics, individuals with mental disabilities, and families with children in an attempt to drive them out from rent-controlled units and replace them with wealthier tenants.⁷⁵ A 2016 study by the Urban Institute examining discrimination against families with children in rental markets found that familial status could

⁷¹ Georgia State University, Department of Economics, *Do Landlords Discriminate in the Rental Housing Market? Evidence from an Internet Field Experiment in U.S. Cities*, http://excen.gsu.edu/workingpapers/GSU_EXCEN_WP_2011-05.pdf.

⁷² U.S. Department of Housing and Urban Development, Office of Policy Development and Research, *Housing Discrimination Against Racial and Ethnic Minorities*, 2012, https://www.huduser.gov/portal/Publications/pdf/HUD-514_HDS2012.pdf.

⁷³ National Bureau of Economic Research, *Estimating Racial Price Differentials in the Housing Market*, May 2012, <http://www.nber.org/papers/w18069.pdf>.

⁷⁴ U.S. Department of Justice, *Justice Department Obtains Record \$2.725 Million Settlement of Housing Discrimination Lawsuit*, November 2009, <https://www.justice.gov/opa/pr/justice-department-obtains-record-2725-million-settlement-housing-discrimination-lawsuit>.

⁷⁵ Los Angeles Times, *Investment firm ousts mentally ill and Latino families to flip Koreatown buildings, lawsuit alleges*, November 2016, <http://www.latimes.com/local/lanow/la-me-ln-koreatown-evictions20161118-story.html>.

affect the average size of units offered and rents quoted to testers in Los Angeles.⁷⁶ Discrimination by landlords can have a significant effect on whether members of protected classes have access to certain neighborhoods.

Source of income discrimination

Source of income discrimination significantly contributes to R/ECAPs in the City of Los Angeles and the broader region. Many Americans living in poverty or with disabilities rely on federal or state assistance, including rental assistance, for their income. When landlords have the latitude to reject tenants based on the source of their income, those who rely on governmental assistance become more constrained in their housing options, are barred from neighborhoods where their source of income is not recognized, and can have trouble accessing housing at all.⁷⁷ In a competitive rental market like Los Angeles, the effects of this kind of discrimination are particularly acute for low-income families in need of housing. Although California does have a law that bans source of income discrimination, in 2010 in *Sabi v. Sterling*, the California Court of Appeal for the Second District interpreted the law to not cover discrimination against households using Section 8 or Housing Choice Vouchers.⁷⁸ The rental listings on Craigslist sharply illustrate the impact of that decision; one search reveals more than 75 rental listings in central LA that specifically note that Section 8 applicants are not welcome and about 300 ads of this kind in the county at-large.

The California State Senate has a bill pending (SB 1053) that would protect tenants who rely on Section 8 vouchers, but it has not passed yet.⁷⁹ Elsewhere in California, Santa Clara County has banned Section 8 discrimination in its unincorporated areas, Santa Monica has passed a law prohibiting the practice in City limits,⁸⁰ and San Jose is considering a similar measure.⁸¹ However, the City of Los Angeles has no such protections in place today.

Source of income discrimination severely limits the housing opportunities for low-income renters, many of whom are Black and Hispanic. While the vast majority of census tracts in the City contain fewer than 50 households that rely on Section 8 Housing Choice Vouchers, census tracts with the highest concentrations of households receiving voucher assistance are located primarily in majority-minority areas.⁸² Also, between 2000 and 2013, the number of households in the City receiving assistance from both programs decreased overall, a decline that was almost universal in majority white areas.⁸³ But, the few areas in which the number of households relying on federal assistance rose were mostly in majority-minority neighborhoods.⁸⁴ This has contributed to the creation of new R/ECAPs in the few areas that have been truly accessible to populations that rely on Section 8 vouchers.

⁷⁶ <https://www.huduser.gov/portal/sites/default/files/pdf/HDSFamiliesFinalReport.pdf>

⁷⁷ <https://affordablehousingonline.com/blog/law-aims-to-end-section-8-source-of-income-discrimination>

⁷⁸ See *Sabi v. Sterling*, 183 Cal. App. 4th 916 (Cal. Ct. App. 2010)

⁷⁹ <https://affordablehousingonline.com/blog/law-aims-to-end-section-8-source-of-income-discrimination>

⁸⁰ <https://lafla.org/news/press-releases/ordinance-prohibiting-discrimination-against-voucher-holders-upheld/>

⁸¹ <https://nextcity.org/daily/entry/san-jose-section-8-discrimination-legal>

⁸² <http://www.urbandisplacement.org/map/la>

⁸³ <http://www.urbandisplacement.org/map/la>

⁸⁴ <http://www.urbandisplacement.org/map/la>

iii. Disparities in Access to Opportunity

a. Educational Opportunities

Educational Opportunities: Disparities in Access to Proficient Schools Based on Race/Ethnicity, National Origin and Family Status

Using HUD provided data through the AFFH tool, displayed in Map 1, it is evident that children residing in large portions of the City of Los Angeles have low access to proficient schools. Values in the HUD School Proficiency Index below are ranked from 0 to 100 with higher scores indicating higher quality schools in a neighborhood. Census tracts near and around R/ECAPs have particularly low access to proficient schools. As illustrated in Map 1, neighborhoods in East LA, Central LA, and South LA have the least access to proficient schools. Moving further south into the Harbor section of the City, levels of access begin to improve. However, the Valley area of the City encompassing North, South, and West Valley, in particular, has the greatest access to proficient schools. This signals a correlation between patterns of segregation and integration and access to quality schools.

Overlaying racial and ethnic demographics over school proficiency levels further demonstrates disparities in accessing proficient schools based on race and residency patterns. Looking at Map 2, which displays residential patterns based on race and ethnicity, and Map 3, which shows the distribution of foreign born populations within the City and their proximity to proficient schools, Black and Hispanic children, including children of Mexican, Guatemalan, and Salvadoran national origin specifically, have the least access to proficient schools.

In 2016, public schools across the state of California tested students in math and English. Students in grades three through eight and eleventh grade were tested to assess whether the State's school age youth were on track to matriculate in college. 2016 was the first year of testing under the Common Core State Standards (CCSS), which were adopted by the State in 2010. The Common Core required classroom changes and provided specifications on what students should know in math and English by certain grade levels.⁸⁵ The standardized state tests measured students on reading and writing along with math. Students were assessed to see if they were acquiring academic attainment levels on track for college admittance. At the State level, 48% of students met or exceeded English standards and 37% of students met or advanced in math standards.⁸⁶ Higher opportunity areas of the state, including Montecito in Santa Barbara County, San Marino in the San Gabriel Valley and La Cañada in the Crescenta Valley in Los Angeles County, were home to the best performing school districts. Examining the Los Angeles Unified School District (LAUSD), which is the state's largest district and the country's second largest, test scores lag behind the rest of the state.⁸⁷ Out of over 265,000 students tested, 39% met or progressed in state English standards and 29% met or exceeded the state math standards. Although this was the first year of testing under the CCSS standards, these scores were an increase of 6% points from the previous year's scores in math and English proficiency. However, they remained lower than state averages.

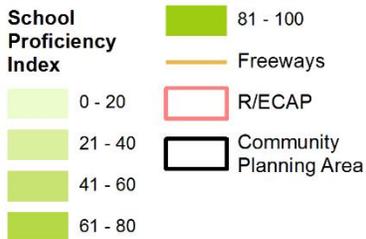
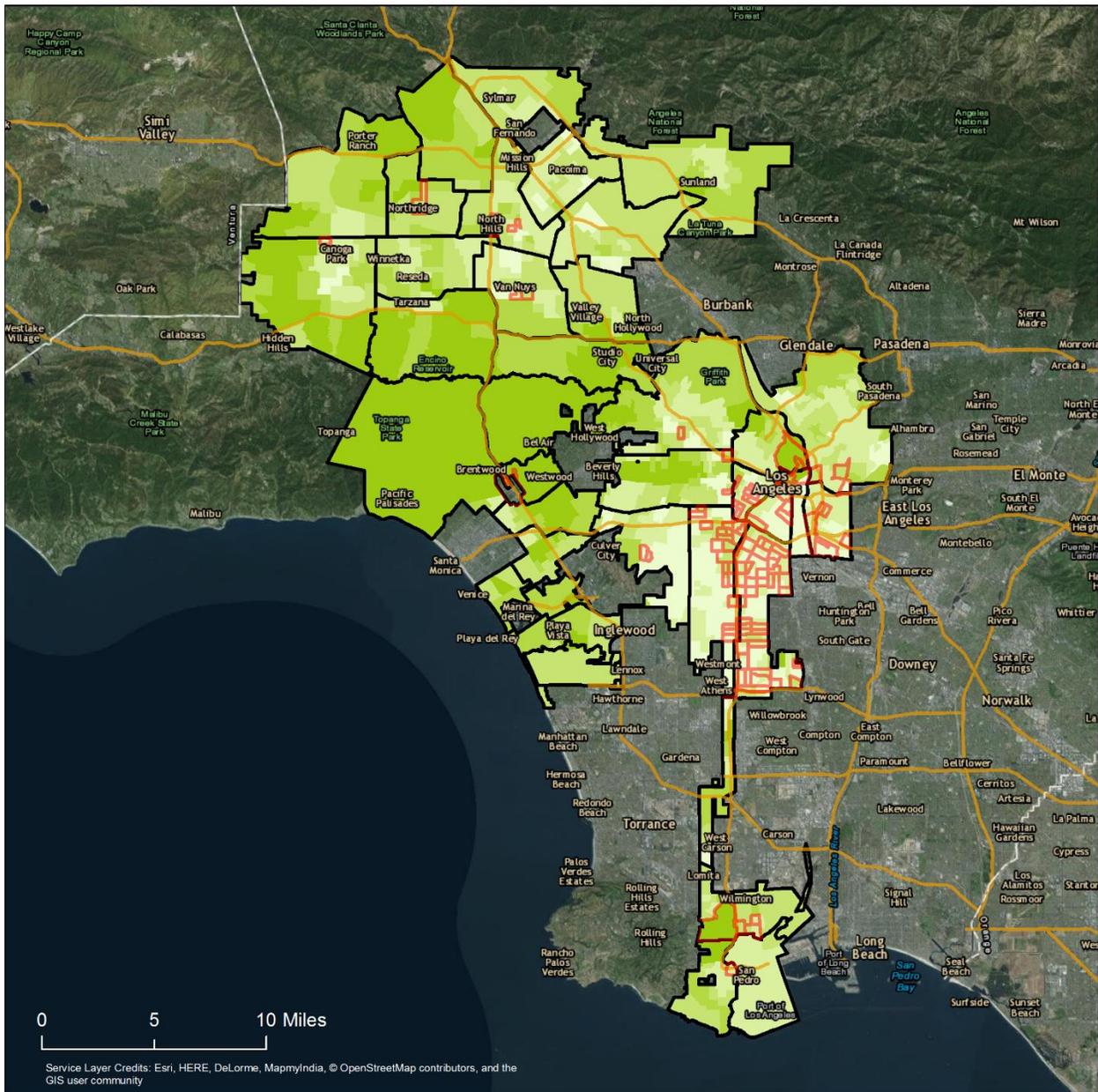
⁸⁵Public Policy Institute of California. "Implementing the Common Core Standards in California", 2016, <http://www.ppic.org/publication/implementing-the-common-core-state-standards-in-california/>.

⁸⁶ Blume, Howard, et al., *California's K-12 Test Scores: What are they, why they matter and how your school scored?* *The Los Angeles Times*, 24, August, 2016, <http://www.latimes.com/projects/la-me-edu-test-scores-2016/?q=brooklyn&p=1&c=name&o=asc#search-your-school>. Assessed August 2017.

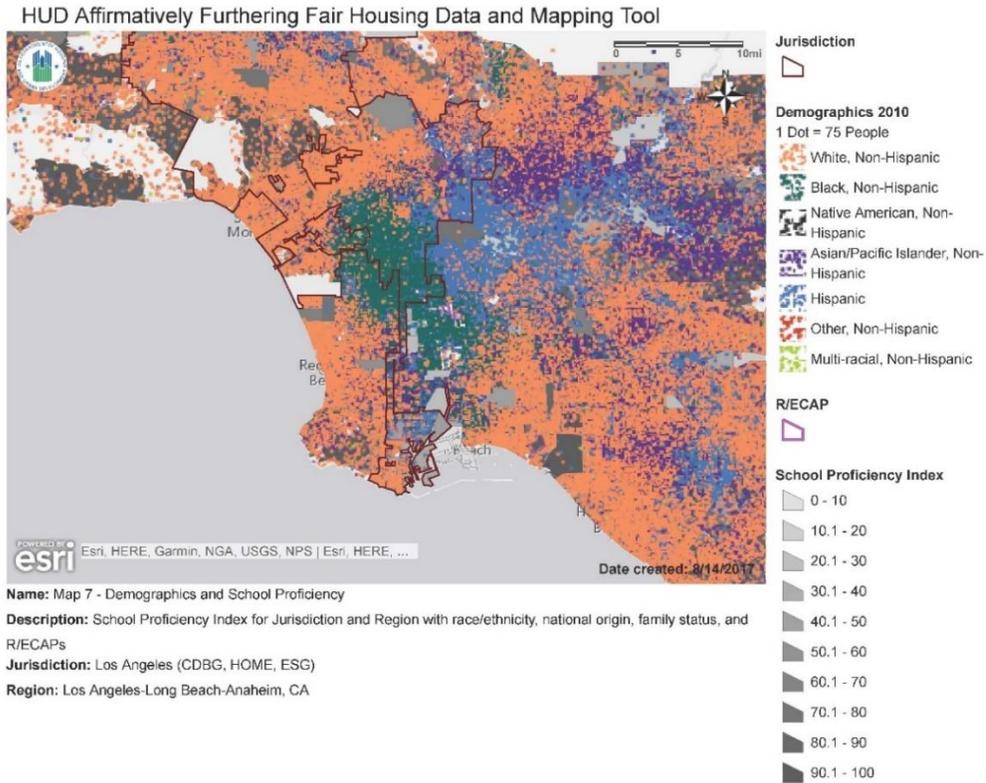
⁸⁷ California School Dashboard. *Los Angeles Unified School District Academic Performance*, 2017, <https://www.caschooldashboard.org/#/Details/1964733000000/1/Status>. Accessed August 2017.

Map 1

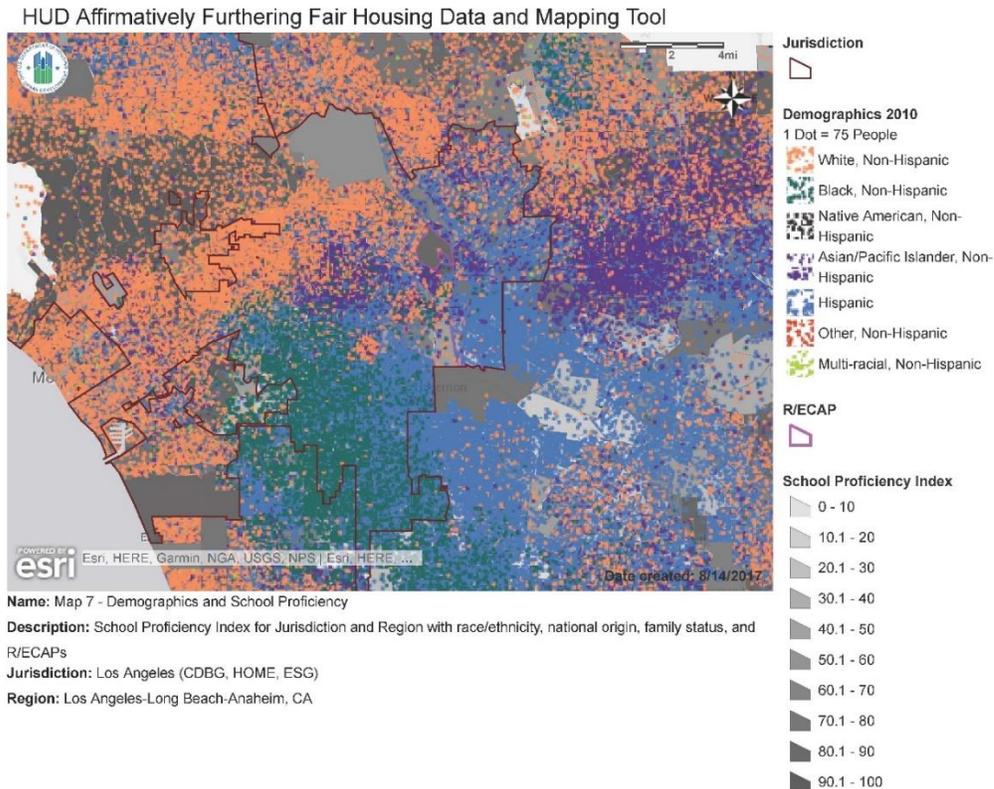
City of Los Angeles: School Proficiency Index



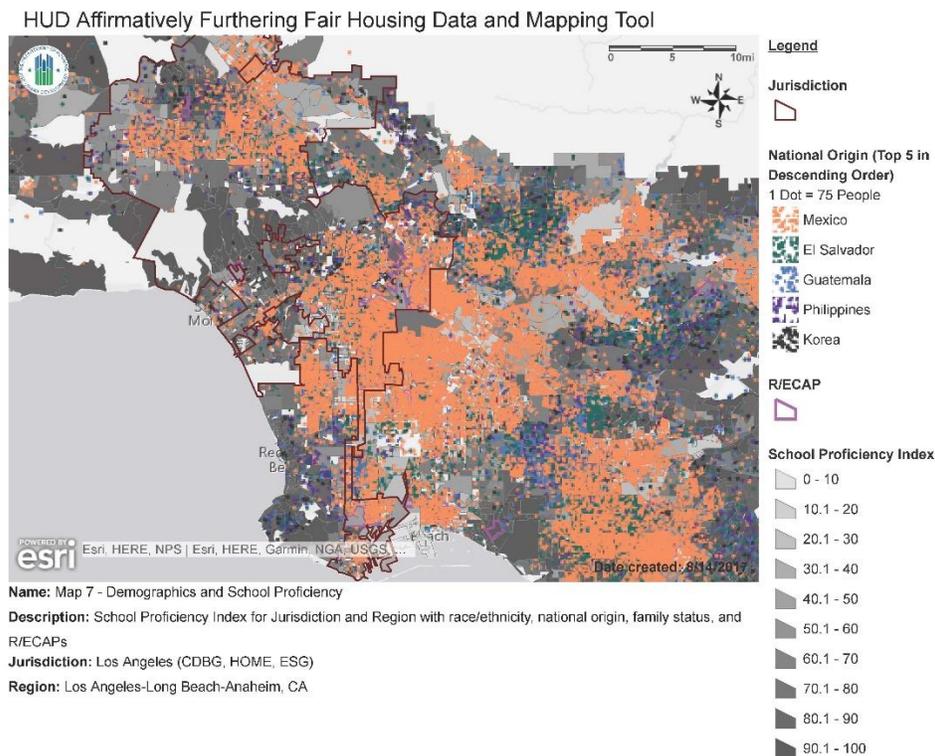
Map 2 (1 of 2) Demographics and School Proficiency for Los Angeles City



Map 2 (2 of 2 close up of Southeast LA City) Demographics and School Proficiency



Map 3 Demographics and School Proficiency with Top 5 National Origin Populations for Los Angeles City



Earlier this year the State released the California School Dashboard, a color coded visual tool to assess student proficiency between schools. The dashboard replaces the Academic Performance Index (API), which previously provided each school an overall rating based on test scores. The dashboard provides three measurement reports graded on a curve and evaluates schools on test scores and annual progress. In addition to math and English test scores, the dashboard ratings consider the current status of schools on measurements such as graduation rates and suspensions, along with annual progress on each measurement. The color-coded designations are a combined measurement of current status and longitudinal trends with blue showing the highest score and red displaying the lowest score.

Using the new dashboard and analyzing data specific to LAUSD, nearly 44% (12,950) of the 29,500 students of the 2013 – 2014 cohort were not performing at college and career preparedness levels (see Table 4 California Dashboard LAUSD Proficiency Report). Of the 2013 – 2014 cohort, 29% (8,427) were approaching preparedness, and only 28% (8,123) were prepared. Although math and English proficiency saw slight gains from the previous year, overall the district continued to have low performance levels, garnering a number of measurement factors a yellow designation. Furthermore, a closer look at the 5-by-5 Placement Report for English (Table 5) shows that students with disabilities have the lowest performance level (Red) and experienced no status change from the previous year. The district did see some gains, between 5 to 15 points, in English proficiency among Filipino, White, and multi-racial students. To a lesser degree, students generally and English Language Learners, socioeconomically disadvantaged students, Black students, Hispanic students, and Native American students, in particular, saw gains. Examining math proficiency using the 5-by-5 Placement Report (Table 6), there were also gains among the same racial and ethnic groups. Once again students with disabilities received the lowest performance level (Red), and there was no growth in performance among them.

In reporting for spring 2017 displayed in Table 7, the state dashboard suspension report shows a blue designation, reflecting a very low rate of suspensions (0.6%) and a slight decline of 0.4% from the previous year. Out of the 516,717 students assessed, 28% are English Language Learners. The suspension rate for English Language Learners' was low and stable at 0.5%.⁸⁸ English Language Learners are considered a high need student group, along with low income students and foster youth, as categorized by the California State Department of Education. Data was not available specifically for foster youth or students experiencing homelessness. Reviewing the state 5-by-5 Placement Report for suspension rates, displayed in Table 8, which rates schools and student groups on a 5-by-5 grid on current conditions and changes over time in each district, suspension rates were low and stable for Asians, in general, and specifically for Filipino students. The suspension rate was also very low and declined for all students and specifically students grouped by the State as socioeconomically disadvantaged, American Indian, Pacific Islander, and White students. LAUSD received the highest designation score (Blue) for these student groups' suspension rates.

As previously shown in the LAUSD Suspension Rate Report in Table 7 and indicated by the 5-by-5 Placement Report in Table 8, students with disabilities (status: 1.4% and change: -0.9%) and Black students (status: 2.3% and change: -0.6%) overall have low and declining suspension rates although both student groups received lower performance level designations (Green) in comparison to other groups. The 2014 – 2015 school year saw a total of 65,492 students with disabilities enrolled, of which 913 were suspended (Table 9 5-by-5 Placement Report for Suspension Indicator). Comparatively, in the same school year, 45,631 Black students enrolled, of which 1,037 were suspended. Hispanic students make up the largest share of LAUSD pupils with 398,044 students enrolled for the same school year, 1,880 of whom were suspended. The only group to see an increase in suspension rate compared to the previous year was multi-racial students. A total of 4,160 multi-racial students enrolled during the 2014 – 2015 school year, and 30 of these students were suspended.⁸⁹

⁸⁸ California School Dashboard. *Los Angeles Unified School District Academic Performance, Suspension Rate Report*, 2017, <https://www.caschooldashboard.org/#/ReportDetail/1964733000000/1/2>. Assessed August, 2017.

⁸⁹ California School Dashboard. *California Model Five-by-Five Placement Reports & Data, Suspension Indicator*, 2017. <http://www6.cde.ca.gov/californiamodel/report?indicator=susp&year=2017s&cdcode=1964733&scode=&reportty pe=sgroups>. Assessed August 2017.

Table 4

7/24/2017 California School Dashboard - Los Angeles Unified Detailed Reports




Home FAQ Resources Glossary Translate Search

Home / Los Angeles Unified - Los Angeles / Detailed Report

Detailed Report

Los Angeles Unified - Los Angeles County

Enrollment: 490,474 **Socioeconomically Disadvantaged:** 84% **English Learners:** 28% **Foster Youth:** N/A

Grade Span: P-Adult **Charter School:** No

Reporting Year: Spring 2017

[Equity Report](#) [Status and Change Report](#) **[Detailed Reports](#)** [Student Group Report](#)

This report shows information about the indicators used to assess academic performance in the Dashboard. Select any of the underlined indicators for more detailed information.

Academic Performance
School Conditions and Climate
Academic Engagement

State Indicators	All Students Performance	Status	Change
English Learner Progress (K-12)		Medium 67.1%	Maintained -1.2%
<u>English Language Arts (3-8)</u>		Low 39.4 points below level 3	Increased +10.7 points
<u>Mathematics (3-8)</u>		Low 60.5 points below level 3	Increased +7.7 points
Other State Measures	Number of Students	Status	Change
English Language Arts (Grade 11)	24,466	9.1 points above level 3	+18.2 points
Mathematics (Grade 11)	24,364	74.1 points below level 3	+17.2 points

The College/Career Indicator (CCI) contains both college and career measures which recognizes that students pursue various options to prepare for postsecondary and allows for fair comparisons across all LEAs and schools.

Total Number of 2013-14 Cohort Students	College/Career Level	Number of Cohort Students at Each Level	Percent of Cohort Students at Each Level
29500	Prepared	8123	27.5%
	Approaching Prepared	8427	28.6%
	Not Prepared	12950	43.9%

More detailed information regarding the criteria for the three CCI performance levels can be obtained at the California Department of Education Web page at <http://www.cde.ca.gov/ta/ac/cm/cci.asp> (<http://www.cde.ca.gov/ta/ac/cm/cci.asp>).

Select any of the underlined local indicators to see the local data for those with a met rating.

Local Indicators	Ratings
Basics (Teachers, Instructional Materials, Facilities)	N/A
Implementation of Academic Standards	N/A

Performance Levels: Blue (Highest) Green Yellow Orange Red (Lowest)

An asterisk (*) shows that the student group has fewer than 11 students and is not reported for privacy reasons. The performance level (color) is not included when there are fewer than 30 students in any year used to calculate status and change. An N/A means that data is not currently available.

Table 5

7/24/2017

Los Angeles Unified Report - California Accountability Model (CA Dept of Education)



Home / Testing & Accountability / Accountability / California Accountability Model & School Dashboard / Five-by-Five Placement Reports & Data

California Model Five-by-Five Placement Reports & Data

Los Angeles Unified (Los Angeles County)

[Return to Search](#)

[View the Dashboard Report](#)

English Language Arts (Grades 3-8) - Student Group Five-by-Five Placement

Select an Indicator: **English Language Arts (Grades 3-8) Indicator**

Reporting Year: **2017 (Spring)**

[View Schools Five-by-Five Report](#)

[View Detailed Data](#)

LEVEL	Declined Significantly by more than 15 points	Declined by 1 to 15 points	Maintained Declined by less than 1 point or increased by less than 7 points	Increased by 7 to less than 20 points	Increased Significantly by 20 points or more
Very High 45 or more points above	Yellow (None)	Green (None)	Blue (None)	Blue (None)	Blue (None)
High 10 points above to less than 45 points above	Orange (None)	Yellow (None)	Green (None)	Green <ul style="list-style-type: none"> ■ Asian ■ Filipino ■ Two or More Races ■ White 	Blue (None)
Medium 5 points below to less than 10 points above	Orange (None)	Orange (None)	Yellow (None)	Green (None)	Green (None)
Low More than 5 points below to 70 points below	Red (None)	Orange (None)	Yellow (None)	Yellow <ul style="list-style-type: none"> ■ All Students (District Placement) ■ English Learners ■ Socioeconomically Disadvantaged ■ American Indian or Alaska Native ■ Black or African American ■ Hispanic or Latino ■ Native Hawaiian or Pacific Islander 	Yellow (None)
Very Low More than 70 points below	Red (None)	Red (None)	Red <ul style="list-style-type: none"> ■ Students with Disabilities 	Orange (None)	Yellow (None)

Note: Because the local control funding formula (LCFF) treats charter schools as districts, they are not displayed on their district's Five-by-Five Placement report. (The only exception to this rule is when a district oversees only charter schools.)

Total Number of Student Groups in Each Performance Level

All Student Groups	Red	Orange	Yellow	Green	Blue
11	1	0	6	4	0

The CDE applies standard rounding rules to Status and Change. These values are rounded to the nearest tenth before they are displayed throughout the Dashboard and the

Table 6

7/24/2017

Los Angeles Unified Report - California Accountability Model (CA Dept of Education)



Home / Testing & Accountability / Accountability / California Accountability Model & School Dashboard / Five-by-Five Placement Reports & Data

California Model Five-by-Five Placement Reports & Data

Los Angeles Unified (Los Angeles County)

[Return to Search](#)

[View the Dashboard Report](#)

Mathematics (Grades 3-8) - Student Group Five-by-Five Placement

Select an Indicator: **Mathematics (Grades 3-8) Indicator**

Reporting Year: **2017 (Spring)**

[View Schools Five-by-Five Report](#)

[View Detailed Data](#)

LEVEL	Declined Significantly by more than 10 points	Declined by 1 to 10 points	Maintained Declined by less than 1 point or increased by less than 5 points	Increased by 5 to less than 15 points	Increased Significantly by 15 points or more
Very High 35 or more points above	Yellow (None)	Green (None)	Blue (None)	Blue ▪ Asian	Blue (None)
High 5 points below to less than 35 points above	Orange (None)	Yellow (None)	Green (None)	Green ▪ Filipino ▪ Two or More Races ▪ White	Blue (None)
Medium More than 5 points below to 25 points below	Orange (None)	Orange (None)	Yellow (None)	Green (None)	Green (None)
Low More than 25 points below to 95 points below	Red (None)	Orange (None)	Yellow ▪ American Indian or Alaska Native	Yellow ▪ All Students (District Placement) ▪ English Learners ▪ Socioeconomically Disadvantaged ▪ Black or African American ▪ Hispanic or Latino ▪ Native Hawaiian or Pacific Islander	Yellow (None)
Very Low More than 95 points below	Red (None)	Red (None)	Red ▪ Students with Disabilities	Orange (None)	Yellow (None)

Note: Because the local control funding formula (LCFF) treats charter schools as districts, they are not displayed on their district's Five-by-Five Placement report. (The only exception to this rule is when a district oversees only charter schools.)

Total Number of Student Groups in Each Performance Level

All Student Groups	Red	Orange	Yellow	Green	Blue
11	1	0	6	3	1

Table 7

7/24/2017

California School Dashboard - Los Angeles Unified Suspension Rate Report



Home / Los Angeles Unified - Los Angeles / Suspension Rate Report

Home FAQ Resources Glossary Translate Search

Suspension Rate Report

Los Angeles Unified - Los Angeles County

Enrollment: 490,474 Socioeconomically Disadvantaged: 84% English Learners: 28% Foster Youth: N/A Grade Span: P-Adult Charter School: No

Reporting Year: Spring 2017

Equity Report **Status and Change Report** Detailed Reports Student Group Report

This report shows the performance levels for a single state indicator, Suspension Rate, for all student groups. It also shows how the current year (status) compares to prior years (change) for each state indicator. Status and change each have five possible levels, which are displayed with the data for each indicator. Select any of the underlined student groups for more detailed information.

All Blue/Green Yellow Red/Orange

	Student Performance	Number of Students	Status	Change
<u>All Students</u>		516,717	Very Low 0.6%	Declined -0.4%
<u>English Learners</u>		132,090	Very Low 0.5%	Maintained -0.2%
Foster Youth		N/A	N/A	N/A
Homeless		N/A	N/A	N/A
<u>Socioeconomically Disadvantaged</u>		422,870	Very Low 0.6%	Declined -0.3%
<u>Students with Disabilities</u>		65,492	Low 1.4%	Declined -0.9%
<u>African American</u>		45,631	Low 2.3%	Declined -0.6%
<u>American Indian</u>		1,141	Very Low 0.6%	Declined -0.8%
<u>Asian</u>		18,419	Very Low 0.1%	Maintained -0.1%
<u>Filipino</u>		10,057	Very Low 0.1%	Maintained -0.2%
<u>Hispanic</u>		398,044	Very Low 0.5%	Declined -0.3%
<u>Pacific Islander</u>		1,890	Very Low 0.1%	Declined -0.6%
<u>Two or More Races</u>		4,160	Very Low 0.7%	Increased +0.7%
<u>White</u>		35,967	Very Low 0.5%	Declined -0.3%

Performance Levels: Blue (Highest) Green Yellow Orange Red (Lowest)

An asterisk (*) shows that the student group has fewer than 11 students and is not reported for privacy reasons. The performance level (color) is not included when there are fewer than 30 students in any year used to calculate status and change. An N/A means that data is not currently available.

Table 8

7/24/2017

Los Angeles Unified Report - California Accountability Model (CA Dept of Education)



Home / Testing & Accountability / Accountability / California Accountability Model & School Dashboard / Five-by-Five Placement Reports & Data

California Model Five-by-Five Placement Reports & Data

Los Angeles Unified (Los Angeles County)

[Return to Search](#)

[View the Dashboard Report](#)

Suspension (Unified School District) - Student Group Five-by-Five Placement

Select an Indicator:

Reporting Year:

[View Schools Five-by-Five Report](#)

[View Detailed Data](#)

LEVEL	Increased Significantly	Increased	Maintained	Declined	Declined Significantly
Very Low	Gray (N/A)	Green <ul style="list-style-type: none"> Two or More Races 	Blue <ul style="list-style-type: none"> English Learners Asian Filipino 	Blue <ul style="list-style-type: none"> All Students (District Placement) Socioeconomically Disadvantaged American Indian or Alaska Native Hispanic or Latino Native Hawaiian or Pacific Islander White 	Blue (None)
Low	Orange (None)	Yellow (None)	Green (None)	Green <ul style="list-style-type: none"> Students with Disabilities Black or African American 	Blue (None)
Medium	Orange (None)	Orange (None)	Yellow (None)	Green (None)	Green (None)
High	Red (None)	Orange (None)	Orange (None)	Yellow (None)	Yellow (None)
Very High	Red (None)	Red (None)	Red (None)	Orange (None)	Yellow (None)

Note: Because the local control funding formula (LCFF) treats charter schools as districts, they are not displayed on their district's Five-by-Five Placement report. (The only exception to this rule is when a district oversees only charter schools.)

Cut scores are not provided on this chart because Status and Change cut scores are different for elementary, middle, and high schools.

Total Number of Student Groups in Each Performance Level

<http://www6.cde.ca.gov/californiamodel/grid?indicator=susp&year=2017s&cdcode=1964733&reporttype=sgroups>

Table 9

7/24/2017

Los Angeles Unified Detailed Data - California Accountability Model (CA Dept of Education)



Home / Testing & Accountability / Accountability / California Accountability Model & School Dashboard / Five-by-Five Placement Reports & Data

California Model Five-by-Five Placement Reports & Data

Los Angeles Unified (Los Angeles County)

Los Angeles Unified

[Return to Five-by-Five Placement Grid](#)

Suspension (Unified School District) Indicator

[Download Data](#) [View Layout](#)

To sort by topic (e.g., status level, color, etc.) click once on the header to sort in ascending order and click again to sort in descending order.

Student Group	Color	Status Level	Change Level	CURRENT STATUS - 2014-15 Suspension Rate	CHANGE - Difference between 2014-15 Suspension Rate and 2013-14 Suspension Rate	Number of Students Suspended in 2014-15	Number of Students Enrolled in 2014-15	Number of Students Suspended in 2013-14	Number of Students Enrolled in 2013-14	PRIOR STATUS - 2013-14 Suspension Rate (rounded)	Non-certified data flag**
Students with Disabilities	Green	Low	Declined	1.4%	-0.9%	913	65,492	1,520	65,302	2.3%	N
American Indian or Alaska Native	Blue	Very Low	Declined	0.6%	-0.8%	7	1,141	28	2,023	1.4%	N
Black or African American	Green	Low	Declined	2.3%	-0.6%	1,037	45,631	1,402	48,356	2.9%	N
Native Hawaiian or Pacific Islander	Blue	Very Low	Declined	0.1%	-0.6%	2	1,890	17	2,271	0.8%	N
All Students	Blue	Very Low	Declined	0.6%	-0.4%	3,171	516,717	5,034	524,764	1.0%	N
Socioeconomically Disadvantaged	Blue	Very Low	Declined	0.6%	-0.3%	2,702	422,870	4,253	433,126	1.0%	N
Hispanic or Latino	Blue	Very Low	Declined	0.5%	-0.3%	1,880	398,044	3,226	407,335	0.8%	N
White	Blue	Very Low	Declined	0.5%	-0.3%	164	35,967	264	33,572	0.8%	N
English Learners	Blue	Very Low	Maintained	0.5%	-0.2%	696	132,090	1,180	160,462	0.7%	N
Filipino	Blue	Very Low	Maintained	0.1%	-0.2%	11	10,057	36	10,461	0.3%	N
Asian	Blue	Very Low	Maintained	0.1%	-0.1%	25	18,419	52	20,377	0.3%	N
Two or More Races	Green	Very Low	Increased	0.7%	0.7%	30	4,160	0	32	0.0%	N

Note: An asterisk (*) indicates that the student group consists of less than 11 students, the minimum size for any reporting. The performance level (color) is not presented or included for accountability purposes when there are less than 30 students in any year used to calculate status and change.

**Districts and schools that did not certify their suspension (or discipline) data in the California Longitudinal Pupil Achievement Data System (CALPADS) in the current year or prior year automatically are assigned an Orange performance level.

LAUSD received lower performance levels (Yellow) for school graduation rates across student groups. Students with disabilities, English Language Learners, and American Indian students received the lowest performance level designations (Red) shown in Table 10 Graduation Rates Report by Student Groups. In fact, students with disabilities and English Language Learners saw slight increases in graduation rates from the 2013 – 2014 school year; however, American Indian students saw a significant decline (-6.4%) in graduation rates. As demonstrated in Table 11, Students with Disabilities Student Group Report, students with disabilities not only received low performance levels for graduation but also received the lowest designations for math and English proficiency. Although English Language Learners and American Indian students received the lowest designation for graduation rates, their math and English proficiency levels were higher (Yellow) compared to students with disabilities (Table 12 and 13). Looking across all student groups, as shown in Table 14, students with disabilities are the only student group to receive the lowest rating across multiple performance measures.

Table 10

7/24/2017

California School Dashboard - Los Angeles Unified Graduation Rates Report



Home FAQ Resources Glossary Translate Search

Home / Los Angeles Unified - Los Angeles / Graduation Rates Report

Graduation Rates Report

Los Angeles Unified - Los Angeles County

Enrollment: 490,474 Socioeconomically Disadvantaged: 84% English Learners: 28% Foster Youth: N/A Reporting Year: Spring 2017

Grade Span: P-Adult Charter School: No

Equity Report Status and Change Report Detailed Reports Student Group Report

This report shows the performance levels for a single state indicator, Graduation Rates, for all student groups. It also shows how the current year (status) compares to prior years (change) for each state indicator. Status and change each have five possible levels, which are displayed with the data for each indicator. Select any of the underlined student groups for more detailed information.

All Blue/Green Yellow Red/Orange

	Student Performance	Number of Students	Status	Change
<u>All Students</u>		29,747	Low 80.5%	Increased +2.1%
<u>English Learners</u>		6,965	Very Low 59.1%	Increased +1.1%
Foster Youth		N/A	N/A	N/A
Homeless		N/A	N/A	N/A
<u>Socioeconomically Disadvantaged</u>		27,528	Low 81.1%	Increased +2.2%
<u>Students with Disabilities</u>		4,470	Very Low 58%	Increased +4.5%
<u>African American</u>		2,618	Low 78.3%	Increased +2.2%
<u>American Indian</u>		89	Low 67.4%	Declined Significantly -6.4%
<u>Asian</u>		1,186	Medium 88.5%	Maintained +0.5%
<u>Filipino</u>		979	Medium 89.6%	Maintained +0.2%
<u>Hispanic</u>		22,672	Low 80.4%	Increased +2.3%
<u>Pacific Islander</u>		111	Low 81.1%	Increased +1.5%
<u>Two or More Races</u>		85	Low 84.7%	Increased Significantly +89.3%
<u>White</u>		1,980	Low 78.8%	Declined -2%

Performance Levels: Blue (Highest) Green Yellow Orange Red (Lowest)

An asterisk (*) shows that the student group has fewer than 11 students and is not reported for privacy reasons. The performance level (color) is not included when there are fewer than 30 students in any year used to calculate status and change. An N/A means that data is not currently available.

Select here to learn more about which one of the 25 performance results the LEA, school, or student group achieved on this state indicator by viewing the Five-by-Five Grid Placement Report.

(<http://www6.cde.ca.gov/californiamodel/grid?indicator=grad&year=2017&cdcode=1964733&reporttype=sgroups>)

Table 11

7/24/2017

California School Dashboard - Los Angeles Unified Students with Disabilities Student Group Report



Home / Los Angeles Unified - Los Angeles / Students with Disabilities Report

[Home](#) [FAQ](#) [Resources](#) [Glossary](#)

Students with Disabilities Student Group Report

Los Angeles Unified - Los Angeles

Enrollment: 490,474 Socioeconomically Disadvantaged: 84% English Learners: 28% Foster Youth: N/A Grade Span: P-Adult Charter School: N

Reporting Year:

[Equity Report](#)
 [Status and Change Report](#)
 [Detailed Reports](#)
 [Student Group Report](#)

This report shows the performance levels for Students with Disabilities on all state indicators. It also shows how the current year (status) compares to prior years (change) for Status and change each have five possible levels, which are displayed with the data for each indicator. Select any of the underlined indicators for more detailed information.

State Indicators	All Student Performance	Status
Chronic Absenteeism	N/A	N/A
<u>Suspension Rate (K-12)</u>		Low 1.4%
English Learner Progress (K-12)	N/A	N/A
<u>Graduation Rate (9-12)</u>		Very Low 56%
<u>College / Career</u> Available Fall 2017. Select for Grade 11 assessment results.		N/A
<u>English Language Arts (3-8)</u>		Very Low 127.7 points below level 3
<u>Mathematics (3-8)</u>		Very Low 149.3 points below level 3

Performance Levels: Blue (Highest) Green Yellow Orange Red (Lowest)

An asterisk (*) shows that the student group has fewer than 11 students and is not reported for privacy reasons. The performance level (color) is not included when there are students in any year used to calculate status and change. An N/A means that data is not currently available.

Table 12

7/24/2017

California School Dashboard - Los Angeles Unified English Learners Student Group Report



Home / Los Angeles Unified - Los Angeles / English Learners Report

Home FAQ Resources Glossary Translate Search

English Learners Student Group Report

Los Angeles Unified - Los Angeles

Enrollment: 490,474 Socioeconomically Disadvantaged: 84% English Learners: 28% Foster Youth: N/A
 Grade Span: P-Adult Charter School: No

Reporting Year: Spring 2017

Equity Report Status and Change Report Detailed Reports Student Group Report

This report shows the performance levels for English Learners on all state indicators. It also shows how the current year (status) compares to prior years (change) for each state indicator. Status and change each have five possible levels, which are displayed with the data for each indicator. Select any of the underlined indicators for more detailed information.

State Indicators	All Student Performance	Status	Change
Chronic Absenteeism	N/A	N/A	N/A
<u>Suspension Rate (K-12)</u>		Very Low 0.5%	Maintained -0.2%
English Learner Progress (K-12)		Medium 67.1%	Maintained -1.2%
<u>Graduation Rate (9-12)</u>		Very Low 59.1%	Increased +1.1%
<u>College / Career</u> <u>Available Fall 2017. Select for Grade 11 assessment results.</u>		N/A	N/A
<u>English Language Arts (3-8)</u>		Low 67.9 points below level 3	Increased +11.5 points
<u>Mathematics (3-8)</u>		Low 64.8 points below level 3	Increased +8.2 points

Performance Levels: Blue (Highest) Green Yellow Orange Red (Lowest)

An asterisk (*) shows that the student group has fewer than 11 students and is not reported for privacy reasons. The performance level (color) is not included when there are fewer than 30 students in any year used to calculate status and change. An N/A means that data is not currently available.

Table 13

7/24/2017

California School Dashboard - Los Angeles Unified American Indian Student Group Report



Home / Los Angeles Unified - Los Angeles / American Indian Report

Home FAQ Resources Glossary Translate Search

American Indian Student Group Report

Los Angeles Unified - Los Angeles

Enrollment: 490,474 Socioeconomically Disadvantaged: 84% English Learners: 28% Foster Youth: N/A
 Grade Span: P-Adult Charter School: No

Reporting Year: Spring 2017

Equity Report **Status and Change Report** Detailed Reports Student Group Report

This report shows the performance levels for American Indian on all state indicators. It also shows how the current year (status) compares to prior years (change) for each state indicator. Status and change each have five possible levels, which are displayed with the data for each indicator. Select any of the underlined indicators for more detailed information.

State Indicators	All Student Performance	Status	Change
Chronic Absenteeism	N/A	N/A	N/A
<u>Suspension Rate (K-12)</u>		Very Low 0.6%	Declined -0.8%
English Learner Progress (K-12)	N/A	N/A	N/A
<u>Graduation Rate (9-12)</u>		Low 67.4%	Declined Significantly -6.4%
<u>College / Career</u> Available Fall 2017. Select for Grade 11 assessment results.		N/A	N/A
<u>English Language Arts (3-8)</u>		Low 36.3 points below level 3	Increased +14.5 points
<u>Mathematics (3-8)</u>		Low 63.9 points below level 3	Maintained +1.2 points

Performance Levels: Blue (Highest) Green Yellow Orange Red (Lowest)

An asterisk (*) shows that the student group has fewer than 11 students and is not reported for privacy reasons. The performance level (color) is not included when there are fewer than 30 students in any year used to calculate status and change. An N/A means that data is not currently available.

Table 14

7/24/2017

California School Dashboard - Los Angeles Unified Student Group Reports



Home FAQ Resources Glossary Translate Search

Home / Los Angeles Unified - Los Angeles / Student Group Report

Student Group Report

Los Angeles Unified - Los Angeles County

Enrollment: 490,474 Socioeconomically Disadvantaged: 84% English Learners: 28% Foster Youth: N/A
 Grade Span: P-Adult Charter School: No

Reporting Year: Spring 2017

Equity Report Status and Change Report Detailed Reports **Student Group Report**

This report shows the performance levels for all students and for each student group on the state indicators. Select any of the underlined indicators for more detailed information.

State Indicators	All Students	English Learners	Foster Youth	Homeless	Socioeconomically Disadvantaged	Students with Disabilities	American Indian	Asian	African American	Filipino	Hispanic	Pacific Islander	Two or More Races	White
Chronic Absenteeism		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<u>Suspension Rate (K-12)</u>			N/A	N/A										
English Learner Progress (K-12)		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<u>Graduation Rate (9-12)</u>			N/A	N/A										
<u>College / Career Available Fall 2017. Select for Grade 11 assessment results.</u>		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<u>English Language Arts (3-8)</u>			N/A	N/A										
<u>Mathematics (3-8)</u>			N/A	N/A										

Performance Levels: Blue (Highest) Green Yellow Orange Red (Lowest)

An asterisk (*) shows that the student group has fewer than 11 students and is not reported for privacy reasons. The performance level (color) is not included when there are fewer than 30 students in any year used to calculate status and change. An N/A means that data is not currently available.

Stakeholders attending the Educational Opportunities focus group meetings held on January 11th, February 2nd, and February 23rd provided additional confirmation of the patterns seen in the HUD-provided data. During the focus group meetings, there was consensus among education experts and advocates that zip code plays a significant role in a LAUSD student's ability to access good quality schools. Focus group attendees agreed that a lack of coordination between traditional schools, magnet schools, and charter schools, along with a lack of integrated educational services for targeted populations, including students with disabilities and English Language Learners, creates further barriers to parents knowing and understanding their options for taking advantage of school choice. LAUSD offers several educational programs providing more choices for families in the district. These programs include charter schools and magnet schools, which do not follow traditional enrollment procedures. The additional programs have their own separate application processes and are managed by varying LAUSD offices and divisions. Although the district hosts information fairs to allow parents to learn about school options, the application and approval processes remain unclear to families. Ensuring that the information fairs occur during evening hours and weekends could provide greater access to information about school choice options for Black and Hispanic students, who have the least access to proficient schools.

A local education advocate promoted the idea of using the Local Control and Accountability Plan (LCAP), under the Local Control Funding Formula (LCFF), to guarantee access to a quality education for all by folding in the protected class designation with the State's designation of high need student groups. A critical component to LCFF, the LCAP describes how the district will meet their annual goals for students, distinguishing specific activities to address priorities locally and at the state level. State statutes further require that the LCAP planning and implementation processes include parents of targeted disadvantaged students. Other advocates supported increasing special education funding. Currently, the district is fighting a recent decision by the California Department of Education requiring LAUSD to redistribute funding initially allocated for students with disabilities. The State of California is asking the district to shift state funding through the LCFF to other student groups designated as high need students by the State, such as English Language Learners, students in poverty, and foster children.

Educational Opportunities: Relationship of Residency Patterns of Race/Ethnicity, Familial Status, National Origin and Their Proximity to Proficient Schools

In the City of LA, Black and Hispanic individuals typically reside in areas of the City that have low access to good quality schools. Black students are often concentrated in South LA, which includes the City's lowest School Proficiency Index scores. Although Hispanics are more spread out throughout the core of the city, in comparison to Black residents, they remain heavily concentrated in areas with R/ECAPs in East LA, South LA, and Downtown that have low access to proficient schools (visualized in Map 2). Residents of West LA and in the San Fernando Valley, who are predominately White and Asian, have the greatest access to proficient schools. This trend holds true when looking at the distribution of the top five national origin demographics, which include concentrations in areas of the City with the lowest access to quality schools. Out of the top five national origin groups, which include Mexicans, Salvadorians, Guatemalans, Filipinos, and Koreans, a higher share of individuals with Mexican descent reside in areas with low access to proficient schools (as previously shown in Map 3).

Analyzing the HUD-provided data depicted in Map 2 and Table 15, disparities in access to proficient schools that are apparent within the City remain consistent across the region. White residents have the highest access to quality schools. Similarly, Asians also have high access to proficient schools. As noted

previously, Asian residency patterns largely parallel those of Whites, who reside in low poverty areas with quality schools. Controlling for socioeconomic status does not significantly ameliorate these disparities. When breaking out the Asian population and analyzing the top five national origin groups, Filipinos and Koreans are found to have the least access to proficient schools. As shown in Map 3, Filipinos and Koreans are concentrated Wilshire and Koreatown, right outside of areas with clusters of R/ECAPs such as the Westlake District. However, Koreans and Filipinos also reside in areas with higher access to proficient schools in significant numbers, unlike Hispanic and Black residents who are primarily concentrated in high poverty neighborhoods. At the regional and jurisdictional levels, Black children are significantly affected by the relationship between residency and access to proficient schools. Black households living below the poverty line fare the worst with a School Proficiency Index score of 30.73.

Table 15

Opportunity Indicators, by Race/Ethnicity						
(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Jobs Proximity Index	Environmental Health Index
Total Population						
White, Non-Hispanic	57.93	62.34	68.23	81.08	47.55	24.05
Black, Non-Hispanic	27.68	30.48	32.64	85.39	46.66	14.49
Hispanic	25.84	36.83	32.80	84.89	43.11	18.78
Asian or Pacific Islander, Non-Hispanic	43.16	53.61	54.13	84.83	46.90	19.01
Native American, Non-Hispanic	37.48	44.66	45.47	83.58	46.39	21.26

Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA Refer to the Data Documentation for details (www.hudexchange.info).

The California Office to Reform Education (CORE) released the LA School Report analyzing. The report ranks LAUSD schools on scale of 1 - 100 with 100 being the best score. The School Quality Improvement Index measured by the LA School Report contains measurement factors including academic, social-emotional, and culture-climate indicators.⁹⁰ Table 16 provides a listing of the top five best performing and worst performing elementary, middle, and high schools. The best ranked elementary school within LAUSD is Balboa Gifted/High Ability Magnet, located in the San Fernando Valley, which has a perfect score of 100. The worst ranked elementary school is Florence Griffith Joyner Elementary, located in Watts, with a score of 15 (Table 17). In fact, a total of 20 LAUSD schools, 14 district schools and six charter schools are among the bottom 5% of low-performing schools across the State. Moreover, 13 of these schools are elementary schools, and a significant portion of them are concentrated in South LA in and around R/ECAPs (Map 18). Looking again at Table 16, there is a correlation among both district and charter schools between

⁹⁰ California Office to Reform Education (CORE). CORE Districts CORE Index Report, 2016, March, <http://coredistricts.org/indexreports/>. Assessed on August 2017.

low performance and concentrations of racial and ethnic minorities with high rates of poverty. Both the worst performing elementary school and the worst performing high school are located in Watts. The case of these two schools indicates that children who start off at low performing schools face barriers to catching up academically as they advance in grades.

Table 16

Best Ranking Elementary	Worst Ranking Elementary	Best Ranking Middle School	Worst Ranking Middle School	Best Ranking High School	Worst Ranking High School
Balboa Gifted/High Ability Magnet (100)	Florence Griffith Joyner (15)	Alfred B. Nobel Charter (91)	Edwin Markha Middle (23)	Math, Science, & Technology Magnet Academy at Roosevelt High (98)	David Starr Jordan Senior High (22)
Solano Avenue (99)	One Hundred Seventh Street (16)	Hesby Oaks Leadership Center (90)	Loren Miller (926)	Downtown Business High (97)	Early College Academy - LA Tech College (23)
Clover Avenue (99)	Hillcrest Drive (16)	Robert Frost Middle (89)	Samuel Gompers Middle (27)	Francisco Bravo Medical Magnet High (96)	Leadership in Entertainment and Media Arts (LEMA) (34)
Porter Ranch Community (99)	Century Park (17)	Los Angeles Center for Enriched Studies (88)	Horace Mann Junior High (28)	King/Drew Medical Magnet High (96)	Dr. May Angelou Community High (37)
Wonderland Avenue (97)	Annalee Avenue (19)	Paul Revere Charter Middle (87)	Thomas A. Edison (28)	Harbor Teacher Academy (100)	Augustus F. Hawkins High A Critical Design and Gaming (37)

Best and Worst Performing Schools in the LAUSD

Source: LA School Report Analysis for LAUSD Schools Evaluated by the California Office of Reform Education (CORE)

In the case of Florence Griffith Joyner, the high absenteeism rate over two school years, 2013 – 2014 (21%) and increasing in 2014 - 2015 (25%), resulted in the overall poor score for the school (Table 17). Additionally, CORE ranked the school's suspension rate over the two years a low score of 3 out of 10. In 2015, just 12% of students met or exceeded math standards, and only 11% of students met or exceeded standards for English. English Language Learners, who comprise 41% of students at Florence Griffith Joyner, bear the brunt of this lack of access to proficient schools. Alternatively, Balboa Gifted/High Ability Magnet Elementary School received a perfect score of 100 and has substantially lower rates for chronic absenteeism and suspensions. Additionally, a higher percentage of students met or exceeded standards in math and English (Table 19). At Balboa, 69% of Hispanic students and 73% of socio-economically

disadvantaged students met or exceeded State standards in English and 71% met or exceeded standards in math.

Out of the 20 LAUSD worst performing schools included in the Open Enrollment List for 2016, 14 were traditional district schools and six are charter schools within the district. Nine out of the 20 schools are located in LAUSD districts 7 and 8 which encompasses Southeast LA, which also has the highest concentration of R/ECAPs within the City.

Table 17 (1 of 4)

FLORENCE GRIFFITH JOYNER ELEMENTARY

UPDATED - 03/28/16

Public school | 642 students

CDS code: 19647336018527
LAUSD-S

SD: 94% AA: 29% FI:
EL: 41% AI/AN : PI:
SWD: 14% AS: WH: 2%
H/L: 68% Two+: 1%

1963 East 103rd Street
Los Angeles, CA, 90002-3123

	Metric result 2014	Metric result 2015	Change in Metric Performance from 2014 to 2015	Index Level 2015	Change in Index Level from 2014 to 2015
ACADEMIC DOMAIN (see pages 12 & 13 for metric descriptions)					
Academic Performance English Language Arts	-	11% MEET OR EXCEED STANDARDS	-	1 /10	-
Growth English Language Arts	Coming Fall 2016				
Academic Performance Math	-	12% MEET OR EXCEED STANDARDS	-	2 /10	-
Growth Math	Coming Fall 2016				
SOCIAL-EMOTIONAL & CULTURE-CLIMATE DOMAIN (see pages 12 & 13 for metric descriptions)					
Chronic Absenteeism	21% CHRONICALLY ABSENT	25% CHRONICALLY ABSENT	+4%	1 /10	⇒ 0
Suspension Rates (includes students suspended and/or expelled)	2.33% SUSPENDED (AND/OR EXPELLED)	4.67% SUSPENDED (AND/OR EXPELLED)	+2.34%	3 /10	↘ 2
English Learner Re-designation	36% RE-DESIGNATED	31% RE-DESIGNATED	-5%	1 /10	↘ 1
Social-Emotional Skills	Coming Fall 2016				
Culture and Climate	Coming Fall 2016				

Green = above average (Index Levels 8, 9 and 10) Orange = average (Index Levels 4, 5, 6, 7) Red = below average (Index Levels 1, 2, 3)

Table 17 (2 of 4)

FLORENCE GRIFFITH JOYNER ELEMENTARY

UPDATED - 03/28/16

Amount of Improvement Needed to Advance Index Levels

	Index Level 2015	Metric Result in 2015	Change needed to improve 1 Index Level	Change needed to improve 2 Index Levels	Change needed to improve 3 Index Levels
ACADEMIC DOMAIN (see pages 12 & 13 for metric descriptions)					
Academic Performance English Language Arts	1 /10	11% MEET OR EXCEED STANDARDS	+4%	+6%	+8%
Growth English Language Arts	Coming Fall 2016				
Academic Performance Math	2 /10	12% MEET OR EXCEED STANDARDS	+2%	+4%	+6%
Growth Math	Coming Fall 2016				
SOCIAL-EMOTIONAL & CULTURE-CLIMATE DOMAIN (see pages 12 & 13 for metric descriptions)					
Chronic Absenteeism	1 /10	25% CHRONICALLY ABSENT	-9%	-10%	-12%
Suspension Rates (includes students suspended and/or expelled)	3 /10	4.67% SUSPENDED (AND/OR EXPELLED)	-0.68%	-1.68%	-2.68%
English Learner Re-designation	1 /10	31% RE-DESIGNATED	+5%	+9%	+14%
Social-Emotional Skills	Coming Fall 2016				
Culture and Climate	Coming Fall 2016				

Green = above average (Index Levels 8, 9 and 10) **Orange** = average (Index Levels 4, 5, 6, 7) **Red** = below average (Index Levels 1, 2, 3)

Table 17 (3 of 4)

FLORENCE GRIFFITH JOYNER ELEMENTARY

UPDATED - 03/28/16

2015 Performance on the Index Metrics for All Students and Each Subgroup Category

Overall Index results are generally evenly weighted between the all students group and subgroup performance (for subgroups with 20 or more students).

	All Students	Lowest Performing Racial/Ethnic Subgroup	English Learners	Students with Disabilities	Socio-Economically Disadvantaged Students
ACADEMIC DOMAIN (see pages 12 & 13 for metric descriptions)					
Academic Performance English Language Arts	11% MEET OR EXCEED STANDARDS	8% (AA) MEET OR EXCEED STANDARDS	6% MEET OR EXCEED STANDARDS	3% MEET OR EXCEED STANDARDS	11% MEET OR EXCEED STANDARDS
Growth English Language Arts	Coming Fall 2016				
Academic Performance Math	12% MEET OR EXCEED STANDARDS	7% (AA) MEET OR EXCEED STANDARDS	10% MEET OR EXCEED STANDARDS	6% MEET OR EXCEED STANDARDS	13% MEET OR EXCEED STANDARDS
Growth Math	Coming Fall 2016				
SOCIAL-EMOTIONAL & CULTURE-CLIMATE DOMAIN (see pages 12 & 13 for metric descriptions)					
Chronic Absenteeism	25% CHRONICALLY ABSENT	33% (AA) CHRONICALLY ABSENT	16% CHRONICALLY ABSENT	38% CHRONICALLY ABSENT	23% CHRONICALLY ABSENT
Suspension Rates (includes students suspended and/or expelled)	4.67% SUSPENDED (AND/OR EXPELLED)	9.83% (AA) SUSPENDED (AND/OR EXPELLED)	1.69% SUSPENDED (AND/OR EXPELLED)	5.5% SUSPENDED (AND/OR EXPELLED)	4.76% SUSPENDED (AND/OR EXPELLED)
English Learner Re-designation	31% RE-DESIGNATED	(N/A)	(N/A)	(N/A)	(N/A)
Social-Emotional Skills	Coming Fall 2016				
Culture and Climate	Coming Fall 2016				

Green = above average (Index Levels 8, 9 and 10) **Orange** = average (Index Levels 4, 5, 6, 7) **Red** = below average (Index Levels 1, 2, 3)

SD = Socio-Economically Disadvantaged; EL = English Learner; SWD = Students with Disabilities; AA = African-American; AI/AN = American Indian/Alaska Native; AS = Asian; H/L = Hispanic/Latino; FI = Filipino; PI = Pacific Islander; WH = White; Two+/MR = Multiple Races

Table 17 (4 of 4)

FLORENCE GRIFFITH JOYNER ELEMENTARY

UPDATED - 03/28/16

2015 Performance on the Index Metrics for Each Racial/Ethnic Subgroup Category

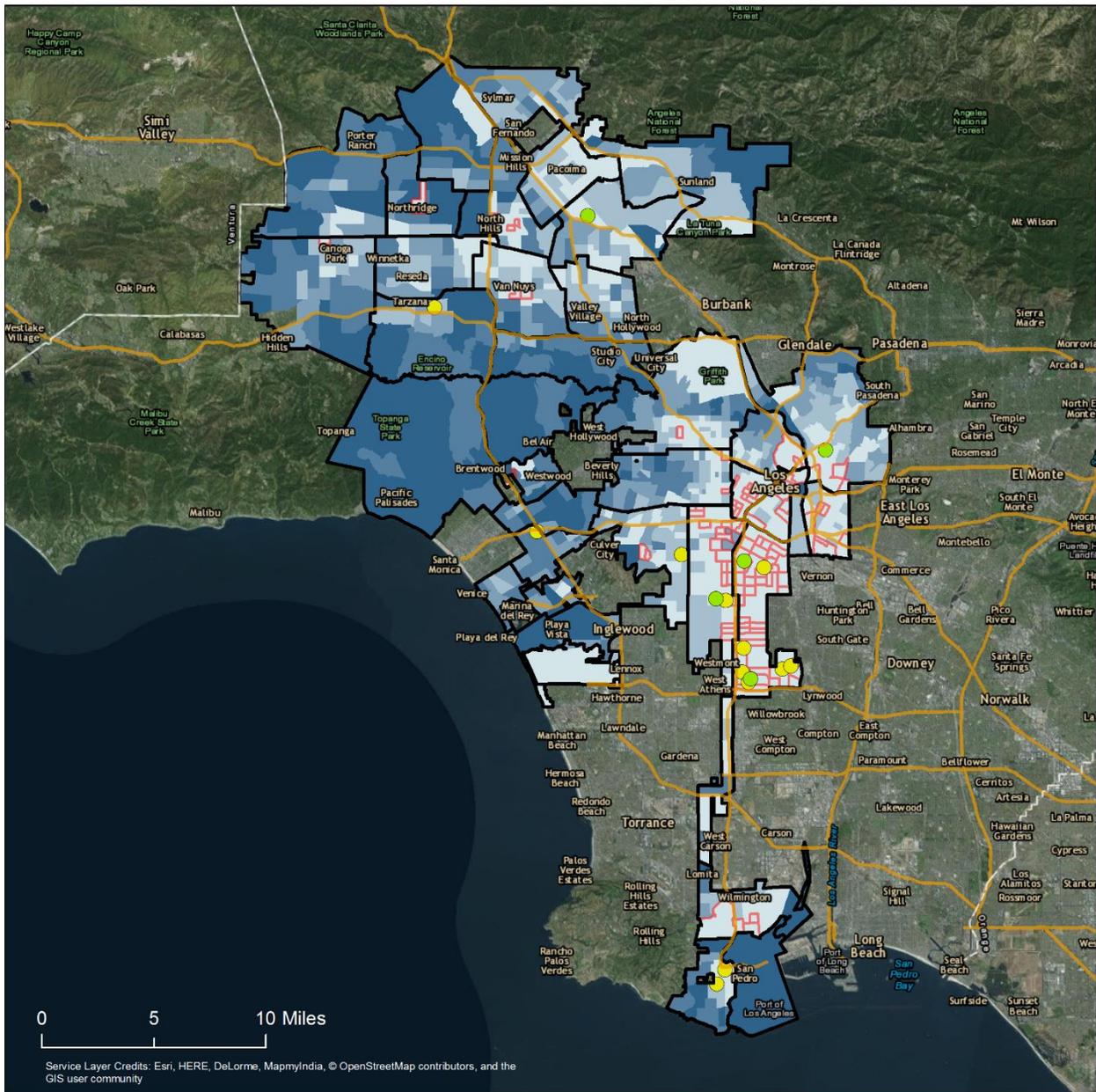
Results provided for subgroups with 20 or more students.

	African-American (AA)	American Indian/Alaskan Native (AI/AN)	Asian (AS)	Hispanic/Latino (H/L)	Filipino (FI)	Pacific Islander (PI)	White (WH)	Two or More Races (Two+)
ACADEMIC DOMAIN (see pages 12 & 13 for metric descriptions)								
Academic Performance English Language Arts	8% MEET OR EXCEED STANDARDS			12% MEET OR EXCEED STANDARDS				
Growth English Language Arts	Coming Fall 2016							
Academic Performance Math	7% MEET OR EXCEED STANDARDS			15% MEET OR EXCEED STANDARDS				
Growth Math	Coming Fall 2016							
SOCIAL-EMOTIONAL & CULTURE-CLIMATE DOMAIN (see pages 12 & 13 for metric descriptions)								
Chronic Absenteeism	33% CHRONICALLY ABSENT			22% CHRONICALLY ABSENT				
Suspension Rates (includes students suspended and/or expelled)	9.83% SUSPENDED (AND/OR EXPELLED)			2.43% SUSPENDED (AND/OR EXPELLED)				
English Learner Re-designation	(N/A)	(N/A)	(N/A)	(N/A)	(N/A)	(N/A)	(N/A)	(N/A)
Social-Emotional Skills	Coming Fall 2016							
Culture and Climate	Coming Fall 2016							

Green = above average (Index Levels 8, 9 and 10) **Orange** = average (Index Levels 4, 5, 6, 7) **Red** = below average (Index Levels 1, 2, 3)

Map 18 (Additional details can be found under Appendix 1 and Appendix 2)

City of Los Angeles: LAUSD Open Enrollment Schools with Low Poverty Index



- | | |
|-------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
| Low Poverty Index | ● LAUSD Charter School |
| 0 - 20 | ● LASUD Traditional School |
| 21 - 40 | Freeways |
| 41 - 60 | R/ECAP |
| 61 - 80 | Community Planning Area |
| 81 - 100 | |

Table 19 (1 of 5)

BALBOA GIFTED/HIGH ABILITY MAGNET ELEMENTARY

UPDATED - 03/28/16

Public school | 748 students

CDS code: 19647336100069
LAUSD-NW

SD: 22% AA: 2% FI: 4%
EL: 5% AI/AN :0% PI: 0%
SWD: 4% AS: 29% WH: 36%
H/L: 21% Two+: 7%

17020 Labrador Street
Northridge, CA, 91325-1906

	Metric result 2014	Metric result 2015	Change in Metric Performance from 2014 to 2015	Index Level 2015	Change in Index Level from 2014 to 2015
ACADEMIC DOMAIN (see pages 12 & 13 for metric descriptions)					
Academic Performance English Language Arts	-	83% MEET OR EXCEED STANDARDS	-	10 /10	-
Growth English Language Arts	Coming Fall 2016				
Academic Performance Math	-	81% MEET OR EXCEED STANDARDS	-	10 /10	-
Growth Math	Coming Fall 2016				
SOCIAL-EMOTIONAL & CULTURE-CLIMATE DOMAIN (see pages 12 & 13 for metric descriptions)					
Chronic Absenteeism	1% CHRONICALLY ABSENT	1% CHRONICALLY ABSENT	0%	10 /10	⇒⇒ 0
Suspension Rates (includes students suspended and/or expelled)	0% SUSPENDED (AND/OR EXPELLED)	0% SUSPENDED (AND/OR EXPELLED)	0%	10 /10	⇒⇒ 0
English Learner Re-designation					⇒⇒ 0
Social-Emotional Skills	Coming Fall 2016				
Culture and Climate	Coming Fall 2016				

Green = above average (Index Levels 8, 9 and 10) **Orange** = average (Index Levels 4, 5, 6, 7) **Red** = below average (Index Levels 1, 2, 3)

SD = Socio-Economically Disadvantaged; EL = English Learner; SWD = Students with Disabilities; AA = African-American; AI/AN = American Indian/Alaska Native; AS = Asian; H/L = Hispanic/Latino; FI = Filipino; PI = Pacific Islander; WH = White; Two+/MR = Multiple Races

Table 19 (2 of 5)

BALBOA GIFTED/HIGH ABILITY MAGNET ELEMENTARY

UPDATED - 03/28/16

Amount of Improvement Needed to Advance Index Levels

	Index Level 2015	Metric Result in 2015	Change needed to improve 1 Index Level	Change needed to improve 2 Index Levels	Change needed to improve 3 Index Levels
ACADEMIC DOMAIN (see pages 12 & 13 for metric descriptions)					
Academic Performance English Language Arts	10 /10	83% MEET OR EXCEED STANDARDS			
Growth English Language Arts	Coming Fall 2016				
Academic Performance Math	10 /10	81% MEET OR EXCEED STANDARDS			
Growth Math	Coming Fall 2016				
SOCIAL-EMOTIONAL & CULTURE-CLIMATE DOMAIN (see pages 12 & 13 for metric descriptions)					
Chronic Absenteeism	10 /10	1% CHRONICALLY ABSENT			
Suspension Rates (includes students suspended and/or expelled)	10 /10	0% SUSPENDED (AND/OR EXPELLED)			
English Learner Re-designation					
Social-Emotional Skills	Coming Fall 2016				
Culture and Climate	Coming Fall 2016				

Green = above average (Index Levels 8, 9 and 10) Orange = average (Index Levels 4, 5, 6, 7) Red = below average (Index Levels 1, 2, 3)

Table 19 (3 of 5)

BALBOA GIFTED/HIGH ABILITY MAGNET ELEMENTARY

UPDATED - 03/28/16

2015 Performance on the Index Metrics for All Students and Each Subgroup Category

Overall Index results are generally evenly weighted between the all students group and subgroup performance (for subgroups with 20 or more students).

	All Students	Lowest Performing Racial/Ethnic Subgroup	English Learners	Students with Disabilities	Socio-Economically Disadvantaged Students
ACADEMIC DOMAIN (see pages 12 & 13 for metric descriptions)					
Academic Performance English Language Arts	83% MEET OR EXCEED STANDARDS	69% (H/L) MEET OR EXCEED STANDARDS			73% MEET OR EXCEED STANDARDS
Growth English Language Arts	Coming Fall 2016				
Academic Performance Math	81% MEET OR EXCEED STANDARDS	66% (H/L) MEET OR EXCEED STANDARDS			77% MEET OR EXCEED STANDARDS
Growth Math	Coming Fall 2016				
SOCIAL-EMOTIONAL & CULTURE-CLIMATE DOMAIN (see pages 12 & 13 for metric descriptions)					
Chronic Absenteeism	1% CHRONICALLY ABSENT	1% (WH) CHRONICALLY ABSENT	0% CHRONICALLY ABSENT		0% CHRONICALLY ABSENT
Suspension Rates (includes students suspended and/or expelled)	0% SUSPENDED (AND/OR EXPELLED)	0% (MR) SUSPENDED (AND/OR EXPELLED)	0% SUSPENDED (AND/OR EXPELLED)	0% SUSPENDED (AND/OR EXPELLED)	0% SUSPENDED (AND/OR EXPELLED)
English Learner Re-designation		(N/A)	(N/A)	(N/A)	(N/A)
Social-Emotional Skills	Coming Fall 2016				
Culture and Climate	Coming Fall 2016				

Green = above average (Index Levels 8, 9 and 10) **Orange** = average (Index Levels 4, 5, 6, 7) **Red** = below average (Index Levels 1, 2, 3)

Table 19 (4 of 5)

BALBOA GIFTED/HIGH ABILITY MAGNET ELEMENTARY

UPDATED - 03/28/16

2015 Performance on the Index Metrics for Each Racial/Ethnic Subgroup Category

Results provided for subgroups with 20 or more students.

	African-American (AA)	American Indian/Alaskan Native (AI/AN)	Asian (AS)	Hispanic/Latino (H/L)	Filipino (FI)	Pacific Islander (PI)	White (WH)	Two or More Races (Two+)
ACADEMIC DOMAIN (see pages 12 & 13 for metric descriptions)								
Academic Performance English Language Arts			92% MEET OR EXCEED STANDARDS	69% MEET OR EXCEED STANDARDS	91% MEET OR EXCEED STANDARDS		82% MEET OR EXCEED STANDARDS	85% MEET OR EXCEED STANDARDS
Growth English Language Arts	Coming Fall 2016							
Academic Performance Math			91% MEET OR EXCEED STANDARDS	66% MEET OR EXCEED STANDARDS	96% MEET OR EXCEED STANDARDS		81% MEET OR EXCEED STANDARDS	82% MEET OR EXCEED STANDARDS
Growth Math	Coming Fall 2016							
SOCIAL-EMOTIONAL & CULTURE-CLIMATE DOMAIN (see pages 12 & 13 for metric descriptions)								
Chronic Absenteeism			0% CHRONICALLY ABSENT	1% CHRONICALLY ABSENT	0% CHRONICALLY ABSENT		1% CHRONICALLY ABSENT	0% CHRONICALLY ABSENT
Suspension Rates (includes students suspended and/or expelled)			0% SUSPENDED (AND/OR EXPELLED)	0% SUSPENDED (AND/OR EXPELLED)	0% SUSPENDED (AND/OR EXPELLED)		0% SUSPENDED (AND/OR EXPELLED)	0% SUSPENDED (AND/OR EXPELLED)
English Learner Re-designation	(N/A)	(N/A)	(N/A)	(N/A)	(N/A)	(N/A)	(N/A)	(N/A)
Social-Emotional Skills	Coming Fall 2016							
Culture and Climate	Coming Fall 2016							

Green = above average (Index Levels 8, 9 and 10) Orange = average (Index Levels 4, 5, 6, 7) Red = below average (Index Levels 1, 2, 3)

Table 19 (5 of 5)

BALBOA GIFTED/HIGH ABILITY MAGNET ELEMENTARY

UPDATED - 03/28/16

Summary of School Quality Improvement Index points

100/100 Overall index ratio (748 Students)	100/100 Elementary School Index Rating (748 Students)	- /100 Middle School Index Rating (0 Students)	- /100 High School Index Rating (0 Students)
---------------------------------------------------------	--------------------------------------------------------------------	-------------------------------------------------------------	-----------------------------------------------------------

Academic domain: **60/60** Socio-emotional/Culture climate domain: **40/40**

	All Students	Lowest Performing Racial/Ethnic Subgroup	English Learners	Students with Disabilities	Socio- Economically Disadvantaged Students	Total Points
ACADEMIC DOMAIN (see pages 12 & 13 for metric descriptions)						
Academic Performance English Language Arts	Level 10 x 15% x 10 = 15	Level 10 x 7.5% x 10 = 7.5 (H/L)			Level 10 x 7.5% x 10 = 7.5	30 out of 30
Growth English Language Arts	Coming Fall 2016					
Academic Performance Math	Level 10 x 15% x 10 = 15	Level 10 x 7.5% x 10 = 7.5 (H/L)			Level 10 x 7.5% x 10 = 7.5	30 out of 30
Growth Math	Coming Fall 2016					
SOCIAL-EMOTIONAL & CULTURE-CLIMATE DOMAIN (see pages 12 & 13 for metric descriptions)						
Chronic Absenteeism	Level 10 x 10% x 10 = 10	Level 10 x 3.33% x 10 = 3.3 (WH)	Level 10 x 3.33% x 10 = 3.3		Level 10 x 3.33% x 10 = 3.3	19.9 out of 20
Suspension Rates (includes students suspended and/or expelled)	Level 10 x 10% x 10 = 10	Level 10 x 2.5% x 10 = 2.5 (MR)	Level 10 x 2.5% x 10 = 2.5	Level 10 x 2.5% x 10 = 2.5	Level 10 x 2.5% x 10 = 2.5	20 out of 20
English Learner Re-designation		(N/A)	(N/A)	(N/A)	(N/A)	
Social-Emotional Skills	Coming Fall 2016					
Culture and Climate	Coming Fall 2016					

Green = above average (Index Levels 8, 9 and 10) **Orange** = average (Index Levels 4, 5, 6, 7) **Red** = below average (Index Levels 1, 2, 3)

For 2015, Florence Griffith Joyner Elementary received the lowest rating of one out of ten for its high rates of chronic absenteeism. A student is considered chronically absent if the student's attendance rate is lower than or equal to 90%. The share of chronically absent students is aggregated to the school level to establish the proportion of chronically absent students for each individual school. If children are not consistently attending classes, there are ripple effects for other performance metrics, including State testing standards. Along with high rates of chronic absenteeism, Florence Griffith Joyner Elementary also had extremely low rates of students who met State standards in math and English (Table 17).

There are many reasons that contribute to students chronically missing school. In the case of Florence Griffith Joyner Elementary, Figure 20 suggests that food insecurity, housing insecurity, lack of access to transportation, and lack of proper health care to address chronic illnesses are causes of absenteeism. For children living in poverty, these issues can be significant barriers to attending school. According to the 2015 National Impact Report conducted by Communities In Schools, one out of every five students in the United States (US) lives in poverty.⁹¹ Based on a poll surveying teachers nationally, up to 88% of teachers indicated student poverty being the number one barrier students encounter to learning in the classroom, and many teachers spend up to 20% of their time helping students with social-emotional and culture-climate problems. In the case of Florence Griffith Joyner Elementary, located in Watts, there are high rates of poverty and concentration of Housing Choice Voucher (HCV) recipients within the school's service area (Map 21). Looking at Table 22, it is also evident that up to 55% of HCV recipients are extremely low income at 0 – 30% area median income (AMI) and up to 53% of HCV recipients within the City are Black. In addition to poverty, Florence Griffith Joyner Elementary is also located in an area of the City that has an extremely low Environmentally Healthy Neighborhoods Index, which could be affecting children's health and thereby contributing to the high rates of chronic absenteeism. Students living near the school could be facing chronic health issues and lack proper medical care or medication. Areas within Southeast LA have some of the City's highest rates of hospitalization and emergency visits caused by chronic illnesses, such as asthma in adults and children.⁹² Moreover, Southeast LA is primarily minority with Hispanics making up 70% of residents and Black residents making up 24%. Florence Griffith Joyner Elementary student body is 97% Hispanic and Black (Table 17, 68% Hispanic and 29% Black). 41% of the students are English Language Learners. By contrast Balboa Gifted/High Ability Magnet Elementary, the highest ranked elementary school in the LAUSD, where the student body is 65% White and Asian and only 21% Hispanic. Additionally, only 5% of students are English Language Learners. Balboa has a much higher share of Hispanic students than it does of Black students, who comprise only 2% of the student body.

⁹¹ Communities In Schools Los Angeles. *National Impact Report: Changing the Picture of Education Across America*, 2015, <http://cislosangeles.org/wp-content/uploads/2016/08/cis-national-impact-report-spring-2016-1.pdf>. Assessed on August, 2017.

⁹² The Health Atlas for the City of Los Angeles, June 2013 <http://planning.lacity.org/cwd/framwk/healthwellness/text/HealthAtlas.pdf>. Assessed August 2017.

Figure 20

THE BARRIERS

10 SURPRISING REASONS STUDENTS DON'T GO TO SCHOOL



1 THEY'RE HUNGRY

When a child is hungry, he or she can't focus on school, extracurricular activities or the future.



2 THEY'RE HOMELESS

Not knowing where they are going to sleep at night may make going to school seem unimportant in comparison.



3 THEY FEEL LIKE THEY DON'T FIT IN

Kids struggling with personal identity or physical appearance suffer from low self-esteem and may become a target for bullying.



4 THEY CAN'T SEE THE BLACKBOARD

Students may give up on their school work rather than admit they can't see what the teacher is writing on the blackboard.



5 THEY CAN'T GET THERE

If students must walk through a dangerous neighborhood or lack reliable transportation, they may stay at home.



6 THEY'RE IN POOR HEALTH

Chronic illness made worse by lack of medical care or proper medication keeps many kids out of the classroom.



7 THEY NEED SCHOOL SUPPLIES

Some students can't afford a simple backpack to carry their books, let alone the basic school supplies they need at school.



8 THEY NEED A CARING ADULT IN THEIR LIFE

If a parent dies or is absent from the home, kids lose the emotional support they need to succeed in school.



9 THEY NEED TO SUPPORT THEIR FAMILY

The burden of caring for a sick parent or the need to hold down a part-time job to pay for groceries can lead to frequent absences.

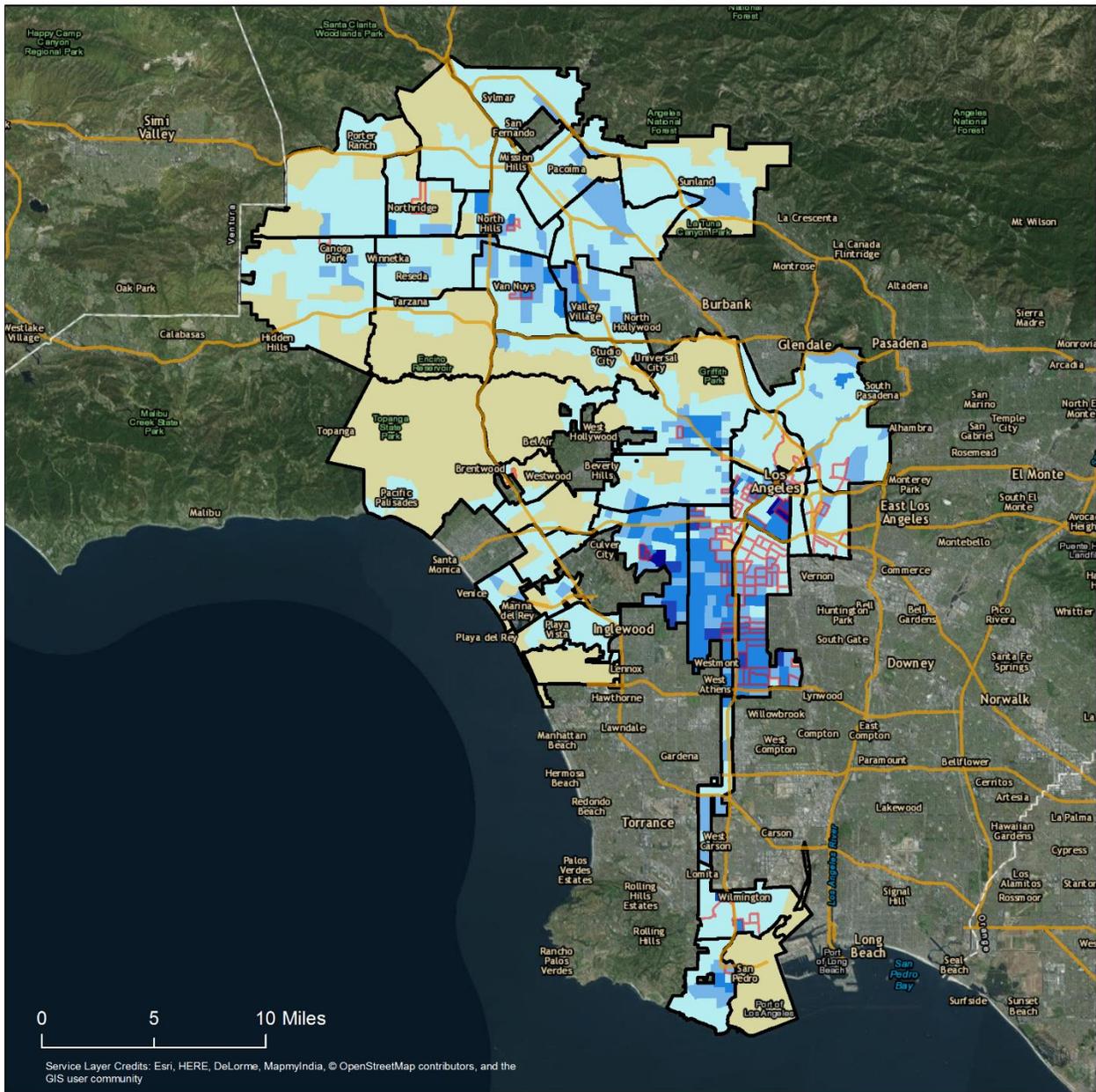


10 THEY DON'T HAVE PROPER SHOES OR CLOTHES

Clothes that fit, shoes without holes or a warm winter jacket are luxuries for some students.

Map 21

City of Los Angeles: Number of Households Receiving Housing Choice Vouchers



0 5 10 Miles

Service Layer Credits: Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community

- | | |
|-----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Households Receiving Vouchers |  601 - 1505 |
|  1 - 50 |  No Voucher Holders |
|  51 - 100 |  Freeways |
|  101 - 300 |  R/ECAP |
|  301 - 600 |  Community Planning Area |

Table 22

(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	223	3.17%	1,685	23.98%	4,918	69.99%	201	2.86%
Project-Based Section 8	4,382	21.58%	3,863	19.02%	5,617	27.66%	6,409	31.56%
Other Multifamily	851	30.13%	280	9.92%	672	23.80%	1,013	35.87%
HCV Program	9,449	22.10%	23,039	53.89%	9,005	21.06%	1,178	2.76%
Total Households	510,140	38.62%	146,570	11.10%	471,240	35.67%	162,019	12.27%
0-30% of AMI	73,675	25.53%	47,200	16.35%	126,635	43.88%	34,589	11.98%
0-50% of AMI	112,300	22.83%	70,530	14.34%	232,130	47.19%	54,289	11.04%
0-80% of AMI	181,610	25.11%	96,015	13.27%	338,220	46.76%	79,799	11.03%
(Los Angeles-Long Beach-Anaheim, CA) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	683	6.99%	2,627	26.90%	6,110	62.56%	344	3.52%
Project-Based Section 8	9,154	23.86%	6,942	18.10%	10,365	27.02%	11,753	30.64%
Other Multifamily	1,707	33.38%	465	9.09%	1,094	21.39%	1,839	35.96%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	1,766,510	41.80%	333,080	7.88%	1,405,070	33.25%	629,349	14.89%
0-30% of AMI	215,775	29.59%	86,225	11.83%	305,885	41.95%	105,314	14.44%
0-50% of AMI	343,565	26.07%	135,740	10.30%	587,685	44.60%	175,814	13.34%
0-80% of AMI	590,895	28.77%	195,155	9.50%	905,370	44.09%	272,549	13.27%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: #s presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).								

Impact of School Related Policies on a Student's Ability to Attend Proficient Schools

Under the Romero Open Enrollment Act, effective in 2010, parents have additional choices when deciding where their children will attend school. Under the Act, the California Department of Education is required to create an enrollment list of 1,000 schools that have the lowest API scores statewide.⁹³ Parents of students who attend one of the 1,000 lowest performing schools have the option of applying to another school within LAUSD or a school outside of the district altogether. The application period to apply for the following school year is from November through January. Parents interested in applying for open enrollment outside the LAUSD must contact outside districts to inquire about the application process.

In 2015, President Barack Obama signed Every Student Succeeds Act (ESSA) into law. The law is going into effect during the 2017–18 school year. The ESSA reauthorizes the Elementary and Secondary Education Act (ESEA), the nation's federal education law, and replaces the No Child Left Behind Act (NCLB). As part of California's transition to the ESSA, California must submit an ESSA Consolidated State Plan (State Plan) to the U.S. Department of Education (ED) in 2017. The State is required to develop the plan in consultation with stakeholders and made a complete draft of California's ESSA State Plan

⁹³ LAUSD Choice Program. *Student Integration Services e-choices*, <http://echoices.lausd.net/Other/OtherChoices.aspx>. Assessed July 2017.

available for public comment from May 22 through June 30, 2017. The State Plan describes the State's implementation of standards, assessments, accountability, and assistance programs. It also describes how the State will put into place federal programs that support:

- Low-income students
- Minority students
- English learners
- Migratory children and youth
- Neglected, delinquent, or at-risk children and youth
- Homeless children and youth
- Effective instruction
- Well-rounded education opportunities
- Community learning centers
- Rural and low-income schools

The initial draft of the State Plan does not include specific policy proposals on these topics. Continued stakeholder input and SBE deliberations will inform further development in these areas, some of which may remain a "plan to plan" in the final State Plan submitted to ED in September 2017.⁹⁴

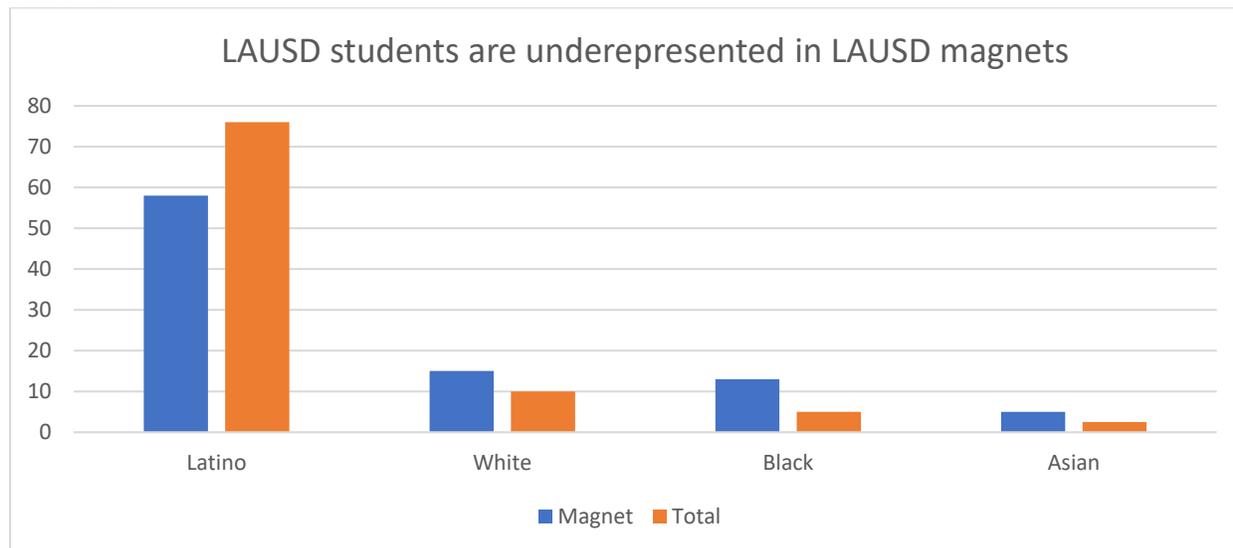
In an effort to increase parents' choice to access quality education for their children, LAUSD offers additional educational programs. The School for Advanced Studies (SAS) program provides support for students who are identified as gifted or highly gifted and students that perform at a high level of academic achievement, designated through LAUSD documentation. SAS provides curriculum emphasizing innovation and research specially designed for gifted learners and accepts applicants based on its eligibility criteria. Students who reside outside of the SAS site boundaries and qualified resident students receive priority placement. Charter schools are another option available to parents. Charter schools are public schools with standards and curriculum authorized by LAUSD and approved by the State but are not directly run by LAUSD. During the 2015 – 2016 school year, there was a total of 274 charter schools in the City of Los Angeles. Charter schools are overseen by the Charter Schools Division, and, to enroll, parents must contact the schools directly. Enrollment is based on the availability of seats during the enrollment period and a public lottery system. Each school has its own admissions and lottery processes.

Currently, 210 magnet school programs are available within the LAUSD system providing additional options for students and parents. Selecting the right magnet school, tackling the application process, and understanding the point system used to grant admission can be confusing to many parents. The magnet program was started as part of desegregation efforts in the 1970s. Thus, magnet schools can provide transportation to students outside of a two-mile radius for elementary schools and outside of a five-mile radius for secondary schools. Although magnet schools provide additional points in the application process to students living in neighborhoods with predominantly Hispanic, Black, and Asian populations

⁹⁴ California Department of Education. Draft ESSA State Plan Public Comment Toolkit <http://www.cde.ca.gov/re/es/draftplantoolkit.asp>. Assessed August 2017.

(PHBAO),⁹⁵ White students are overrepresented in many magnet schools.⁹⁶ Unlike traditional neighborhood schools, which provide priority to neighborhood residents, magnet schools provide themed school offerings specializing in STEM, the arts, and gifted programs, and have competitive enrollment processes. Though three-fourths of LAUSD students are Hispanic, they are underrepresented in magnet schools, as shown in Table 21.

Table 23



As noted in the Educational Opportunities Focus Group meetings held on January 11th, February 2nd, and February 23rd, stakeholders asserted that LAUSD does not always communicate information about magnet school options to students of color and their families in an effective manner. Parents who are knowledgeable about their options and sophisticated enough to navigate the network of traditional schools, magnet schools, and charter schools are more able to exercise their school choice options and access proficient schools while also providing transportation since the District does not typically provide transportation. For many parents, this process can be a burdensome due to its varying deadlines and processes. Furthermore, in 2015, the State transitioned to a new California Assessment of Student Performance and Progress system and did not produce an Open Enrollment list for the 2016 – 2017 school year.⁹⁷ The most recent list available to parents is based off the 2013 State Standards Tests.

A significant change in the California School Dashboard is the shift from numbers to color coded performance levels. Schools and districts are graded on a curve, and they receive credit for progress. The levels range from blue to red, with blue being the highest level and red being the lowest (Blue: very high, green: high, yellow: medium, orange: low and red: very low).⁹⁸ Unlike the API score, with the new

⁹⁵ LAUSD Choice Program. *Student Integration Services e-choices: Magnet Selection Priority Point System*, <http://echoices.lausd.net/Magnet/MagnetPriority.aspx>. Assessed July 2017.

⁹⁶ Kohli, Sonali, *Magnet schools: How to navigate one of LA most complex mazes*, The Los Angeles Times, 9, October, 2015 <http://www.latimes.com/local/education/lausd/la-me-edu-magnet-schools-guide-20151008-htlstory.html>. Assessed July, 2017.

⁹⁷ California Department of Education. *Open Enrollment*, <http://www.cde.ca.gov/sp/eo/op/>. Assessed on July 2017.

⁹⁸ California School Dashboard, <https://www.caschooldashboard.org/#/faq>. Assessed on July 2017.

dashboard, schools do not receive a color rating for overall performance. Each school and district will receive rating based on each performance metric including reading, math, graduation rates, English Language acquisition for nonnative speakers, and suspension rates. Ultimately the dashboard will be the main platform used by districts and the State to rate school performance and utilized by parents to inform school options. A majority of the LAUSD schools had a median (yellow) performance level for the first year of the color-coded system.⁹⁹ Although the State provides extensive data on local schools, the lack of integration between multiple sources of data can pose additional burdens to parents looking for options in school. Providing integrated data allows school districts, parents, and service providers, along with housing advocates, the ability to holistically assess student achievement and barriers facing low performing schools.

In 1996, the LAUSD settled a class action lawsuit on behalf of a tenth-grade student who had incorrectly been classified due to missing critical student records and as a result failed the tenth grade twice. The high school overlooked special tutoring the student received during middle school due to a visual disorder that made it difficult for her brain to process what she was seeing. The Chanda Smith Decree later referred to as the Modified Consent Decree required LAUSD to comply with applicable laws regarding tracking student data.¹⁰⁰ Among the outcomes in the Modified Consent Decree was the obligation that LAUSD build a fully integrated student information system that tracked all data for each student across grade levels and thereby replacing the 26 non-integrated systems. In 2013, LAUSD launched MiSiS, and, upon encountering significant problems with the full rollout in 2014, improvements were made over the next several years. Improvements aimed to ensure schools were prepared to manage enrollment, scheduling, and attendance taking for students on the opening of the 2015-2016 school year. LAUSD having an integrated data system, such as MiSiS, is critical to identifying student needs outside of the classroom that have a significant impact on classroom learning. Although MiSiS data is confidential and is not publicly available, the data can help coordinate efforts among educators and social services providers, including housing advocates. This type of coordination will help foster the appropriate cross-sector supports children need, particularly children in poverty, English Language Learners, and students with disabilities, to ensure they are attending school regularly and receive the proper services to make sure they succeed in the classroom.

The matrix of options for parents in school choice can be a confusing process, and, as a result, proficient schools are not accessible to all families. This can disproportionately impact families living in areas with high concentration of poverty. The majority of schools in the most recent LAUSD Open Enrollment list are located in areas with R/ECAPs (shown earlier in Map 18), which also have a higher percentage of foreign born populations with limited English proficiency. As mentioned previously, the Open Enrollment list allows parents to enroll their children in a school outside of the school within the neighborhood of residence. Recognizing the need, LAUSD has developed a unified enrollment system in an effort to make the process of school choice, which is currently the primary way families can access proficient schools, more equitable and accessible. The new system provides a single application with one deadline for all the district's school choice programs, with the exception of charter schools. The unified enrollment system consolidates the different enrollment processes for each of the school choice programs within the LAUSD. By not including charter schools in the new system or incorporating plans to build a charter school component, the system

⁹⁹ Resmovits, J., Poindexter, S., *California's new education ratings tool paints a rosier picture than in the past*, The Los Angeles Times, 16, March 2017, <http://www.latimes.com/local/education/la-me-california-dashboard-ratings-20170316-story.html>. Assessed on July 2017.

¹⁰⁰ Los Angeles Unified School District. *MiSiS: How did we get here? 1996 – 2015*, <https://achieve.lausd.net/Page/7905>. Assessed August 2017.

does not take into account the schools that roughly 16% of LAUSD students currently attend.¹⁰¹ These schools also have different application processes and deadlines. Furthermore, the new enrollment system also does not include information on school quality. Parents will need to access that information through the new State School Dashboard. By not having clear and comparable school information, the system limits disadvantaged families from accessing the rich landscape of data already available. Two new data tools that have been developed include the State dashboard and the district's integrated data system, MiSiS. Much of the Dashboard data is only available online and does not incorporate offline tools to access the information, which further isolates low income households that do not have in-home internet access. As noted earlier, LAUSD only provides transportation for students who are enrolled in magnet programs. This can make getting to and from school a challenge particularly for families who lack vehicles making schools that are open to them unavailable.

Ensuring LA's youth have access to proficient schools intersects across multiple issues outside of education, including access to information, housing, transportation, and healthcare. Building upon existing models safeguards against duplication and provides for better integration of efforts impacting a student's ability to succeed in school. Programs such as Choice4LA, launched in 2016 through Parent Revolution, focuses on increasing education equity.¹⁰² Choice4LA does this by addressing school choice barriers encountered by the most vulnerable communities within the LAUSD, with an emphasis on reaching families in South LA. Utilizing partnerships with a wide range of organizations, Choice4LA provides services across sectors addressing the unique needs of homeless students, foster youth and students with special needs, with the overarching goal of increasing equity in the education system. There are a number of initiatives to improve access and equity to the students in the City of Los Angeles. The City, through its Housing + Community Investment and Economic and Workforce Development Departments, has two programs focused on increasing the academic performance of its youth, especially in the most vulnerable living in the lowest income areas of the City. Specific and measurable outcomes are an integral part of both the YouthSource and FamilySource Systems. The YouthSource System is funded by the Department of Labor. The program has the dual missions of enhancing educational achievement and creating a pathway to careers for youth. The FamilySource System incorporates a youth's entire family, with a focus on both increasing academic achievement and increasing the overall family income. Both programs partner directly with LAUSD. The YouthSource and FamilySource programs have full-time LAUSD Pupil Services and Attendance Counselors co-located at each of their centers. These graduate level counselors provide a range of services including academic support, youth/family workshops and information about other LAUSD services to both students and their parents. Programs and services at the 16 FamilySource Center locations spread throughout the City, with four of the centers in different sections of South LA, services are specifically designed to assist low income families with becoming self-sufficient financially, academically, and emotionally. The City of Los Angeles currently funds 14 FamilySource Center agencies, two of the agencies have two sites, so there are a total of 16 FSC locations in Los Angeles. Using Community Development Block Grant (CDBG) funding, through the U.S. Department of Housing and Urban Development (HUD), the City provides tutoring services available to LAUSD students at Center locations (Map 24). However,

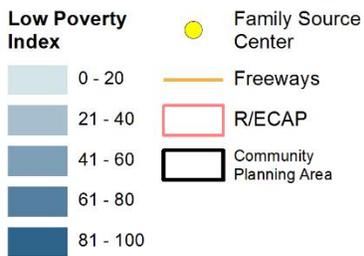
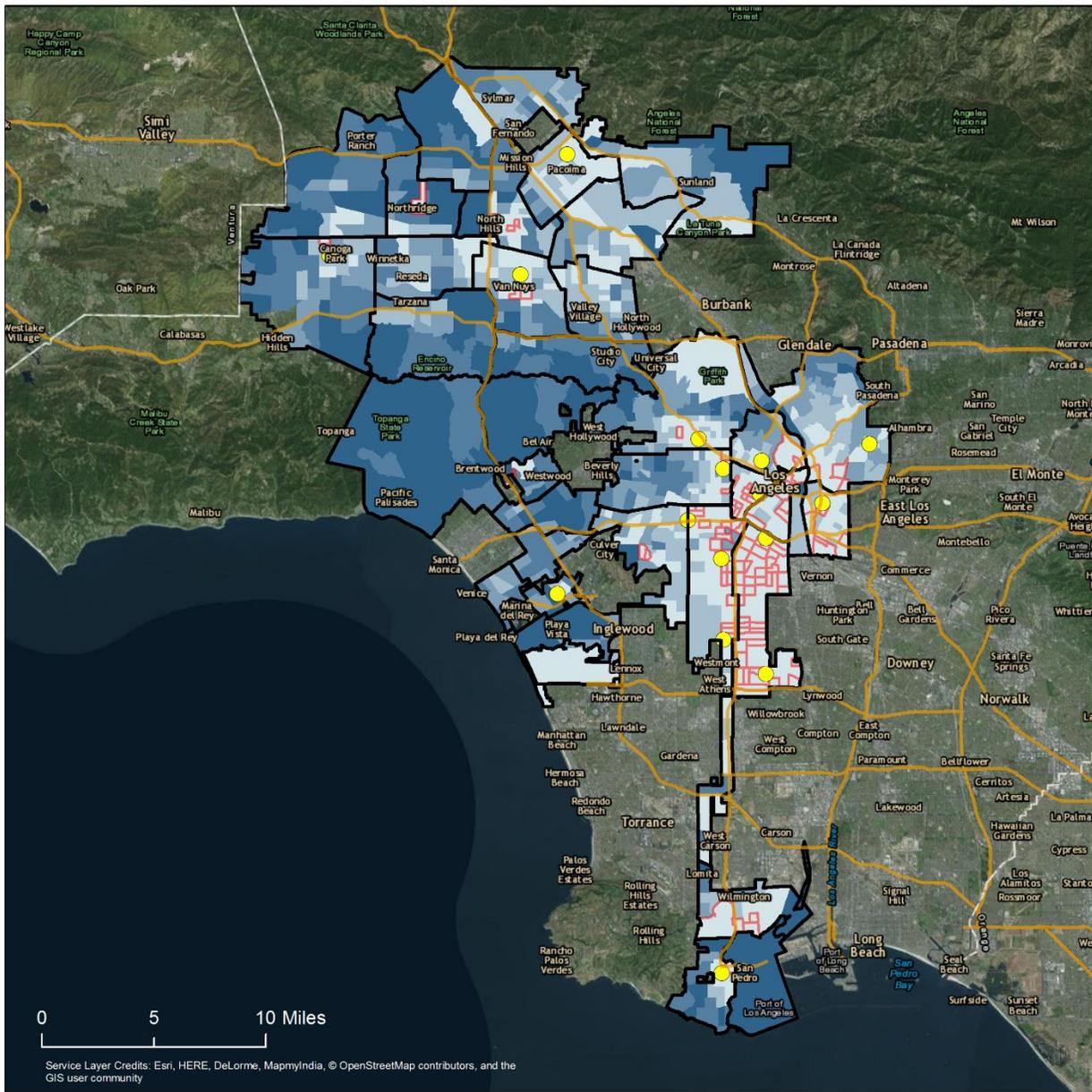
¹⁰¹ LA School Report. *New coalition will advocate for LAUSD's unified enrollment system to include charter schools*, March 2017, <http://laschoolreport.com/new-coalition-will-advocate-for-lausds-unified-enrollment-system-to-include-charter-schools/>. Assessed August 2017.

¹⁰²Parent Revolution. *Choosing Quality: Creating equitable access to great schools for all Los Angeles families*, January 2017, <https://static1.squarespace.com/static/524cab9fe4b076c20018e1a5/t/5887a9eee3df28fbd9cbd6a8/14852858720/65/C4LA+Report+-+eVersion.pdf>. Assessed August 2017.

evaluating FSC service data from 2011 to 2016, tax preparation was the most requested service. Although not directly seeking education services, there is still an opportunity for the FSCs to engage parents about their children's education in addition to offering tutoring services to students. There is also an opportunity for parents and advocates to coordinate with the LAUSD during the LCAP planning process that assesses how the District will meet their annual goals for students. The State requires that the planning and implementation process for the LCAP include parents of targeted disadvantaged students, including students with disabilities and English Language Learners. Regionally Metro's Measure M subsidy program is intended to increase funding for ADA paratransit services along with discounted fares for students. Since LAUSD does not provide district funded transportation on a wide scale across all academic programs, transportation can be a significant barrier preventing families from accessing better performing schools that are open to them through school choice. Tying together regional programs, such as Metro's reduced fare program with housing and community services, and education equity initiatives through Choice4LA can expand and enhance the continuum of services already available. The collection and sharing of data, specifically data allowing for outcome analysis, among cross-sector partners and regional programs will be instrumental to increasing coordination. With greater coordination, families will have access to information and services designed to address challenges to accessing proficient schools for households with the least access. As mentioned earlier, during the Focus Group advocates stressed the need for integrated educational services for targeted populations to reduce and remove barriers faced by parents in knowing and understanding their options.

Map 24

City of Los Angeles: Family Source Center Locations

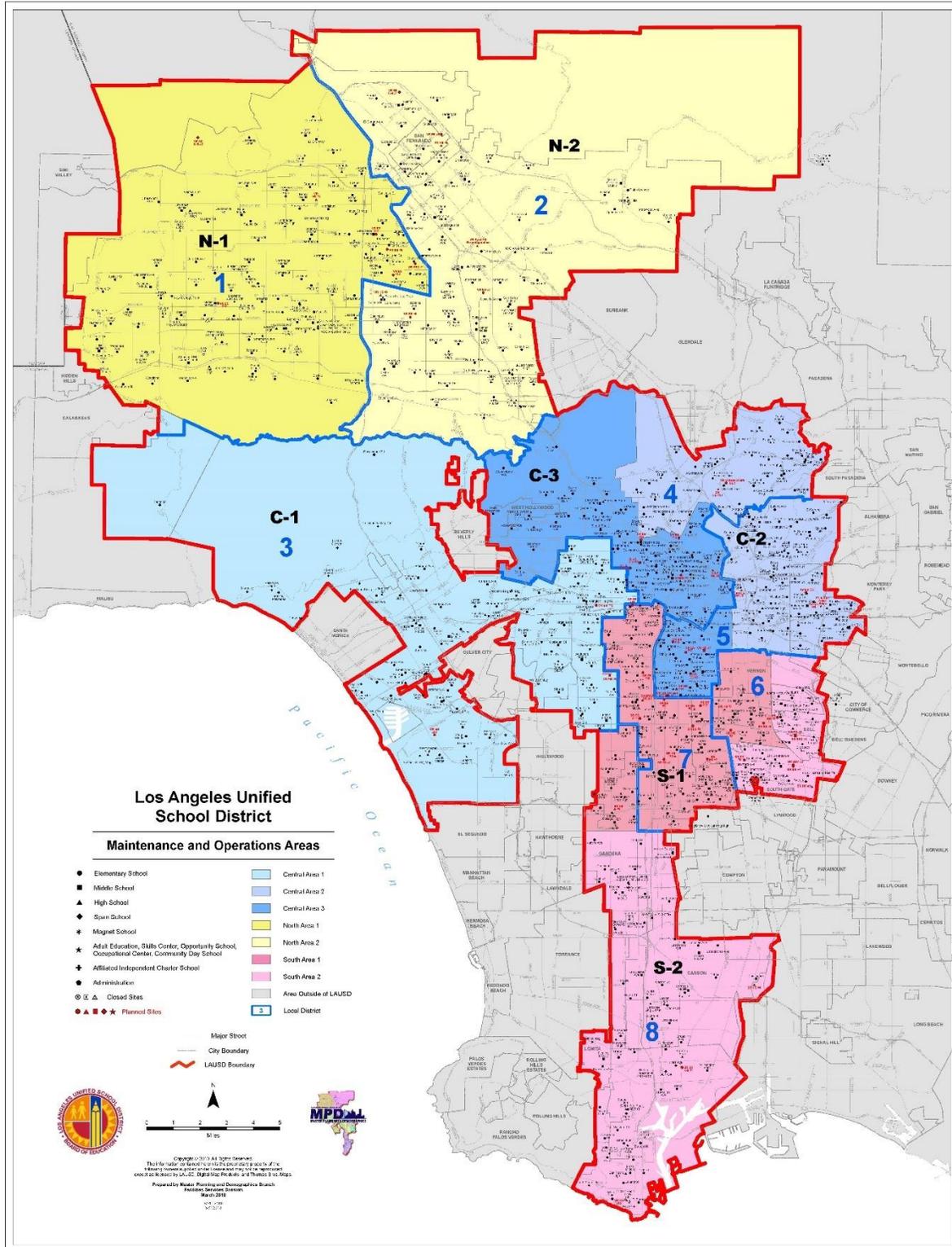


Appendix 1 LAUSD Open Enrollment Schools

School Name	School Type	Maintenance Service Area	and	Zip Code
107th Street	Elementary	S1		90003
Annalee Avenue	Elementary	S2		90746
Augustus F Hawkins SH - Critical Design and Gaming	High	S1		90044
Barton Hill	Elementary	S2		90731
Cabrillo Avenue	Elementary	S2		90731
Daniel Webster	Middle	C1		90064
Dr Owen Lloyd Knox	Elementary	S1		90003
Edwin Markham	Middle	S1		90002
Florence Griffith Joyner	Elementary	S1		90002
George Washington Carver	Middle	C3		90011
Geoge Washington Preparatory	High	S1		90047
Samuel Gompers	Middle	S1		90061
Thomas Bradley Global Awareness Magnet	Elementary	C1		90008
Alain Leroy Locke College Preparatory Academy	High	S1		90061
Los Angeles Leadership Academy Charter School	6th -12th	C3		90031
ICEF Lou Dantzler Preparatory Academy	Elementary	S1		90044
Wallis Annenberg	High	C3		90037

*not correlated with Map 18 listing best and worst performing LAUSD schools.

Appendix 2 LAUSD Maintenance and Service Area (M&A)



b. Employment Opportunities

For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

The Labor Market Index, which is available through the HUD AFFH Tool, analyzes the extent of engagement in the labor market and overall human capital in a neighborhood.¹⁰³ The Labor Market Index examines the level of employment, participation in the labor force, and educational attainment in a census tract, evaluating the unemployment rate and percent of adults age 25 or older with a bachelor's degree or higher. The values range from 0 – 100 and, the higher the score, the higher the labor force participation and human capital in a neighborhood. Within the region, the City of Los Angeles has the lowest neighborhood-level scores for labor market participation and human capital (Map 1). Parts of the San Fernando Valley and West LA boast higher scores in the Labor Market Index. Further examination of the distribution of race and ethnicity and national origin demographics shows that areas with low labor market access also have a high concentration of racial and ethnic minority groups. Examining unemployment for the region using labor statistics, the City has a slightly higher unemployment rate of 4.4% compared to the region as a whole (Table 2 and 3).

As demonstrated in Maps 4 and 5, Hispanic, Black, and Native American (non-Hispanic) residents disproportionately live in areas with low scores on the Labor Market Index. Black Angelenos are primarily concentrated in Central and South LA (Map 4). Unlike Asians, who reside in areas just outside of the City such as the San Gabriel Valley and parts of Orange County with higher scores, Black residents outside the City continue to live in areas with low participation in the labor market and low overall human capital. Within the City's boundaries, Hispanics primarily live in neighborhoods with low Labor Market Index scores. Hispanics are also concentrated in areas with R/ECAPs within the City in East LA and South LA. Looking at the City and region, Whites and Asians live in areas with higher Labor Market Index scores, as shown in Maps 6 and 7. Looking further north and west into the Valley and beyond, the areas with higher labor market scores are primarily occupied by Whites and large shares of Asians are found outside of the City's boundaries towards the east. Filipinos and Koreans are among the top five national origin groups in LA, along with Hispanics from Mexico, El Salvador, and Guatemala (Map 7). Although there are significant concentrations of Filipinos and Koreans near Wilshire and Koreatown, they can also be found extending to West LA and out of the City to areas northeast of the City (Map 6).

Comparing foreign born populations in LA, a larger share of Asian households, up to 31%, are married households without children (Figure 8). Asians also have a much smaller rate of single parent female-headed households in comparison to Hispanics. Analyzing Figure 9, Asians earn a high school diploma and advance to college at much higher rates compared to Hispanics. Up to 40% of Hispanics do not complete high school, and slightly over half obtain a high school certification, such as a GED. Additionally, science and engineering related degrees are the top bachelor's degrees earned by Asians (Figure 10). Further breaking down Hispanics and Asians it is evident that Mexican Americans reside in areas with very low Labor Market Index scores ranging from 10 to 30. Although Asians fair better overall compared to Hispanic, Black, and Native American workers, within the Asian community, Filipinos and Koreans tend to reside in areas within the City with lower labor market scores. Those neighborhoods border census tracts with higher

¹⁰³ Human Capital: “the skills the labor force possesses and is regarded as a resource or asset”. Handbook on Cliometrics: Human Capital, February 2014
http://scholar.harvard.edu/files/goldin/files/human_capital_handbook_of_cliometrics_0.pdf.

labor market scores ranging from 50 to 70, signaling higher access to human capital from neighboring areas. Areas with higher percentages of Black and Hispanic residents overall had the lowest scores in the Labor Market Index. This trend remained consistent and nearly identical for Hispanic and Black residents living below the poverty line (Table 11).

Map 1
City of Los Angeles: Labor Market Index

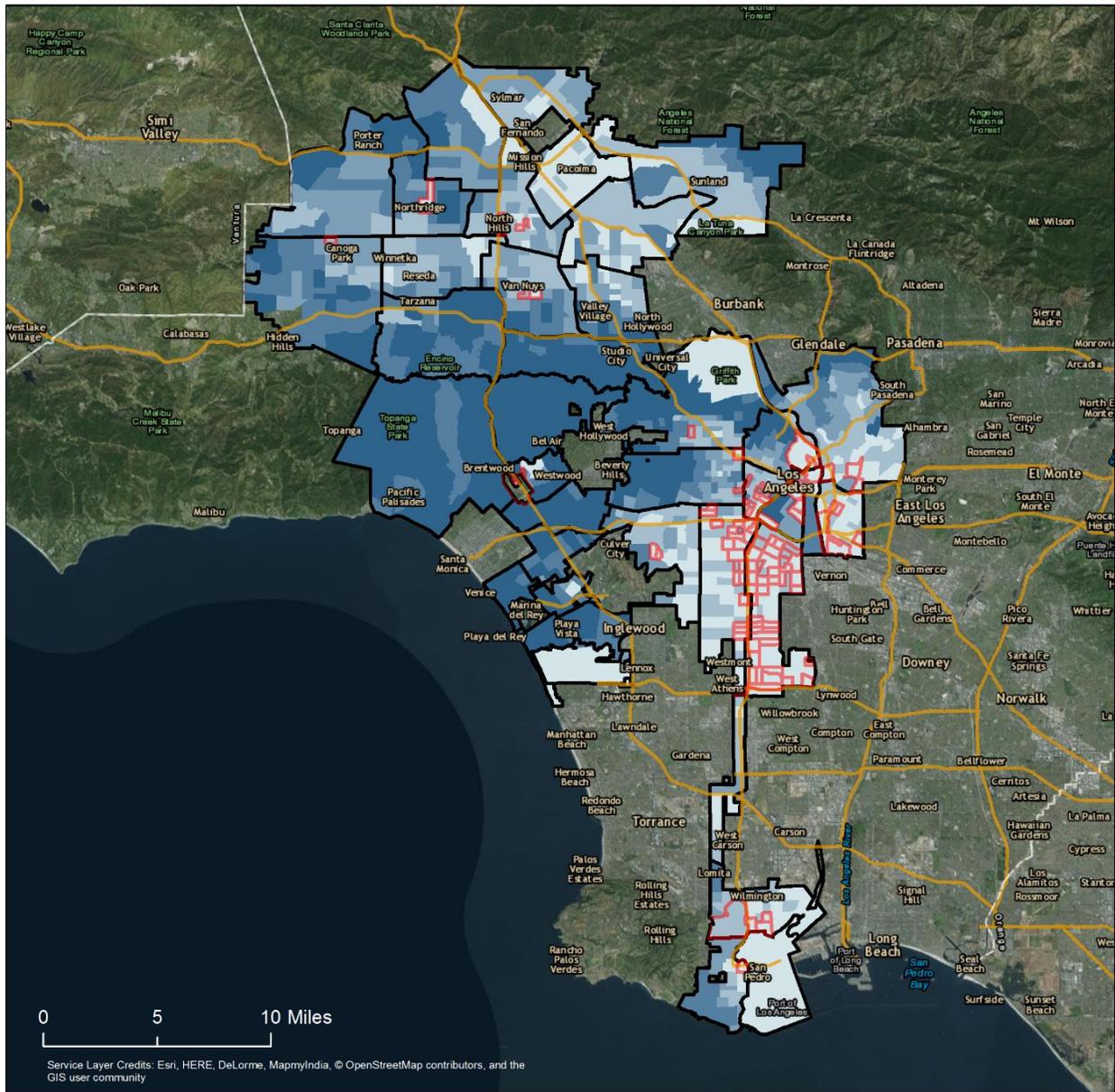


Table 2

Region Unemployment Statistics					
Year	Period	Labor Force	Employment	Unemployment	Unemployment Rate
2017	Jan	6,634,163	6,314,491	319,672	4.8
2017	Feb	6,679,310	6,375,302	304,008	4.6
2017	Mar	6,704,172	6,423,111	281,061	4.2
2017	Apr	6,689,427	6,425,206	264,221	3.9
2017	May	6,675,467	6,419,187	256,280	3.8
2017	Jun	6,686,875(P)	6,396,249(P)	290,626(P)	4.3(P)
R: Data were subject to revision on April 21, 2017.					
P: Preliminary.					
Los Angeles-Long Beach-Anaheim, CA Metropolitan Statistical Area					

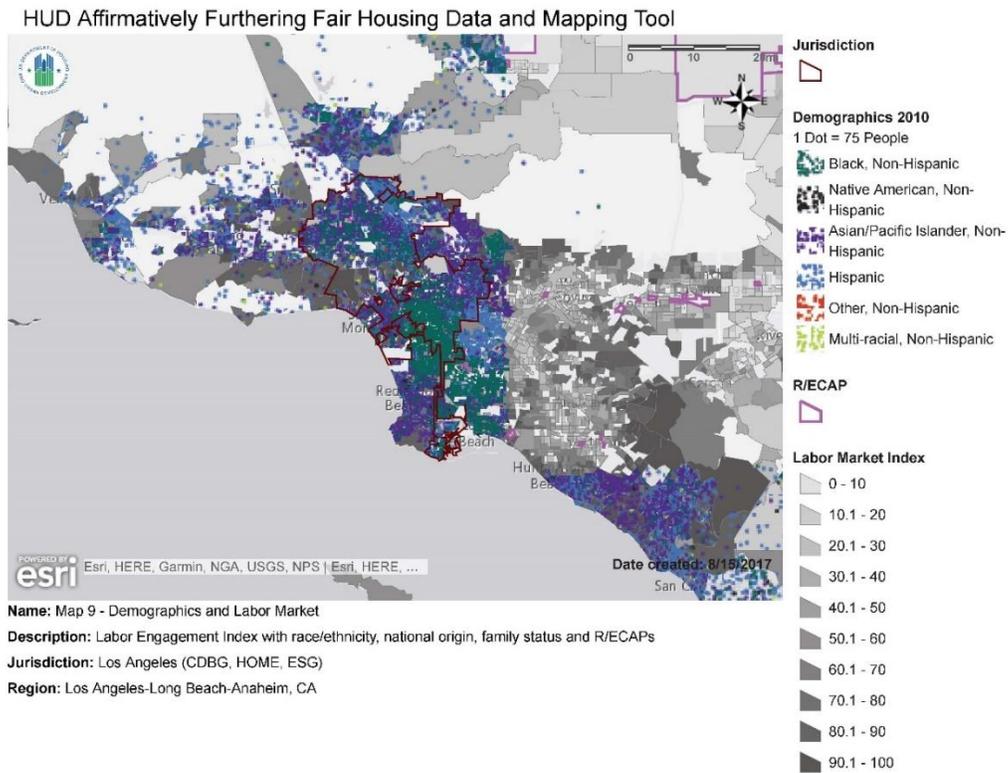
Source: US Department of Labor, Bureau of Labor Statistics

Table 3

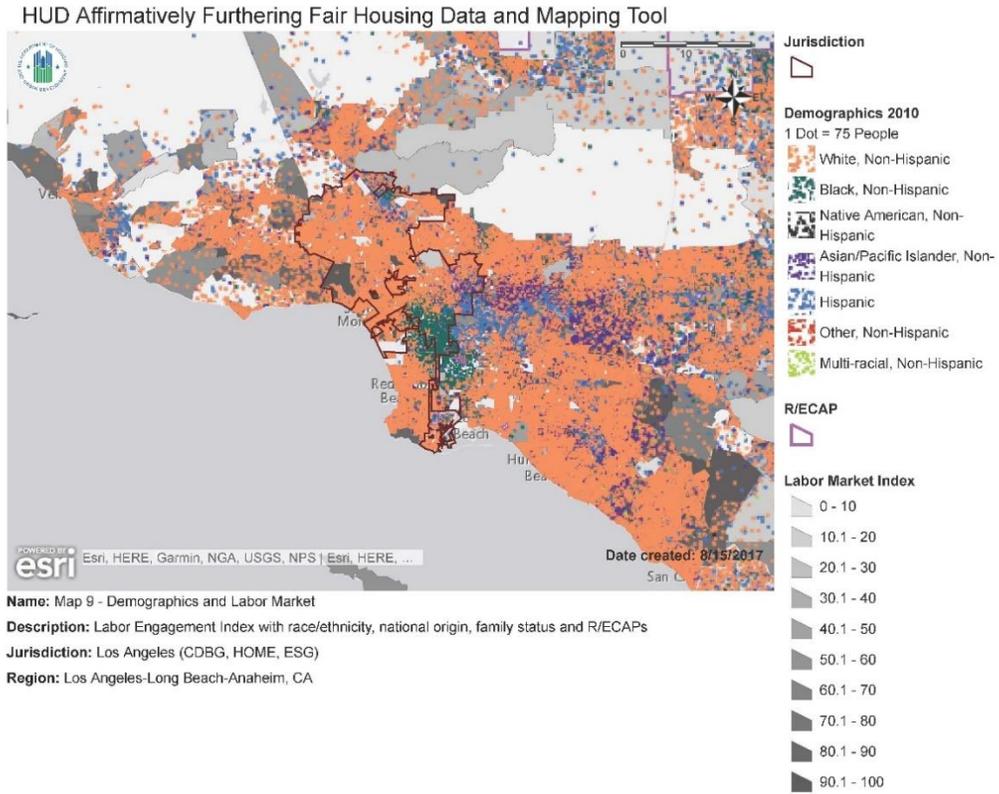
Los Angeles City Unemployment Statistics				
Area Name	Labor Force	Employment	Unemployment	Unemployment Rate
Los Angeles City	2,056,900	1,966,800	90,000	4.4

Source: State of California, Employment Development Department, Labor Market Information Division

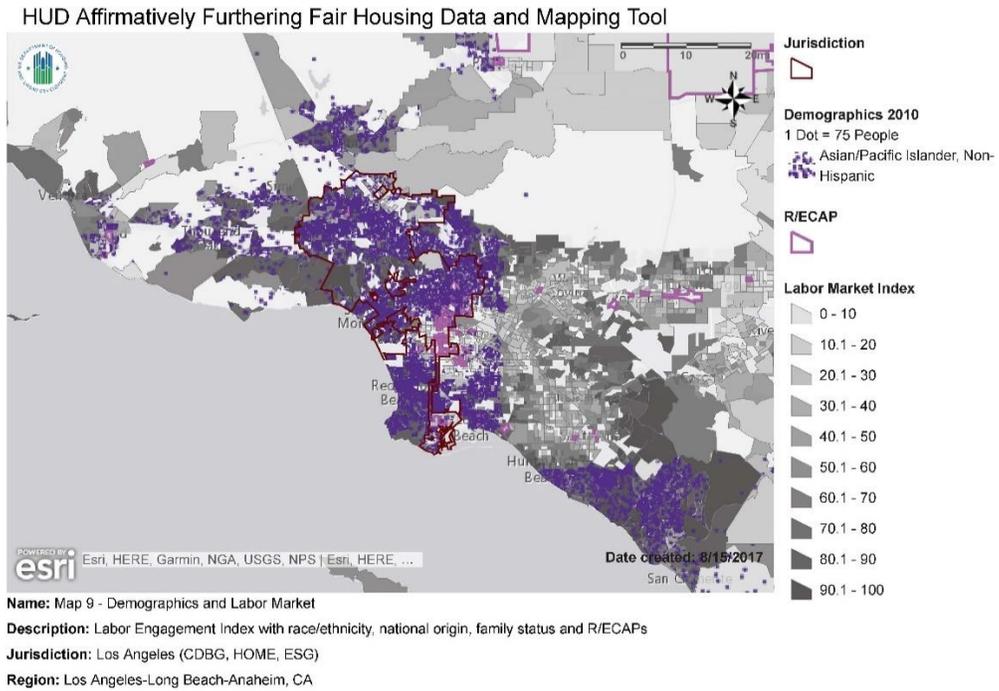
Map 4 Labor Market Index for the Los Angeles Region



Map 5 Demographics and the Labor Market for Los Angeles City



Map 6 Demographics and the Labor Market for Asian/Pacific Islander Non-Hispanic for Los Angeles City



Map 7 Demographics and Labor Market for Top 5 National Origin Populations for Los Angeles City

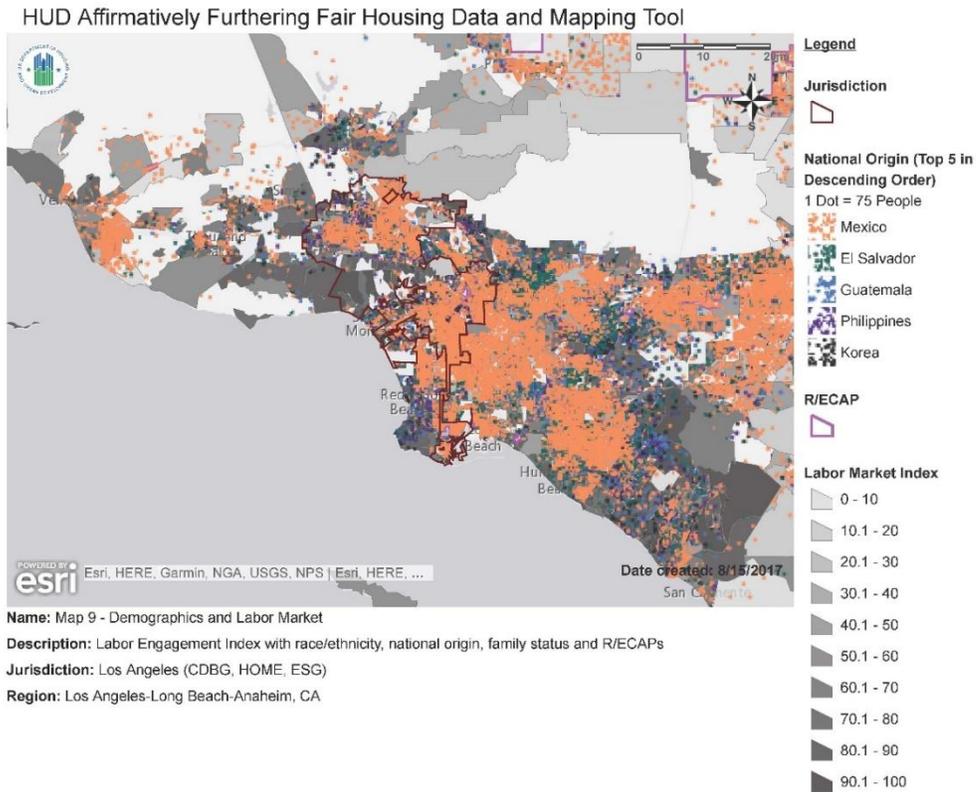
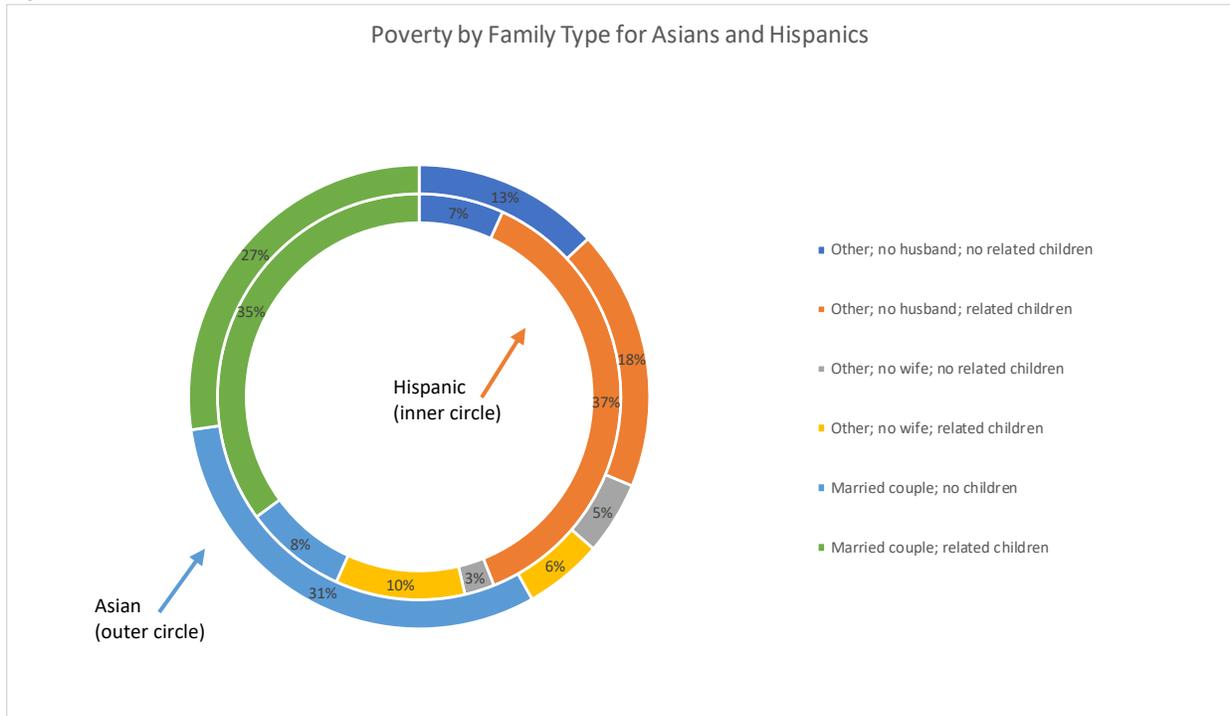
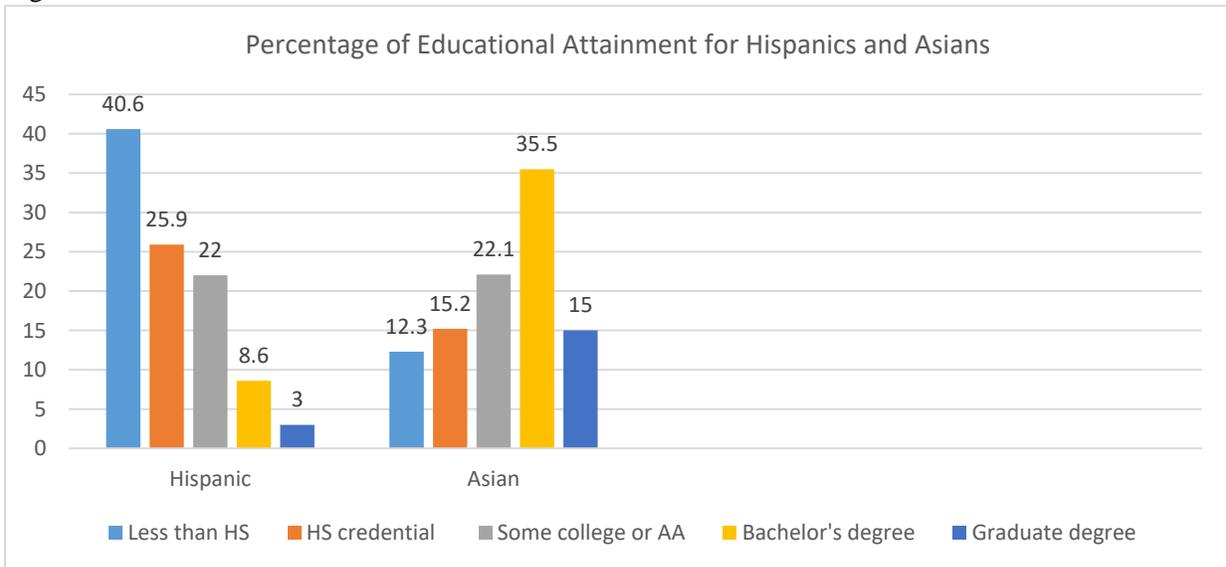


Figure 8



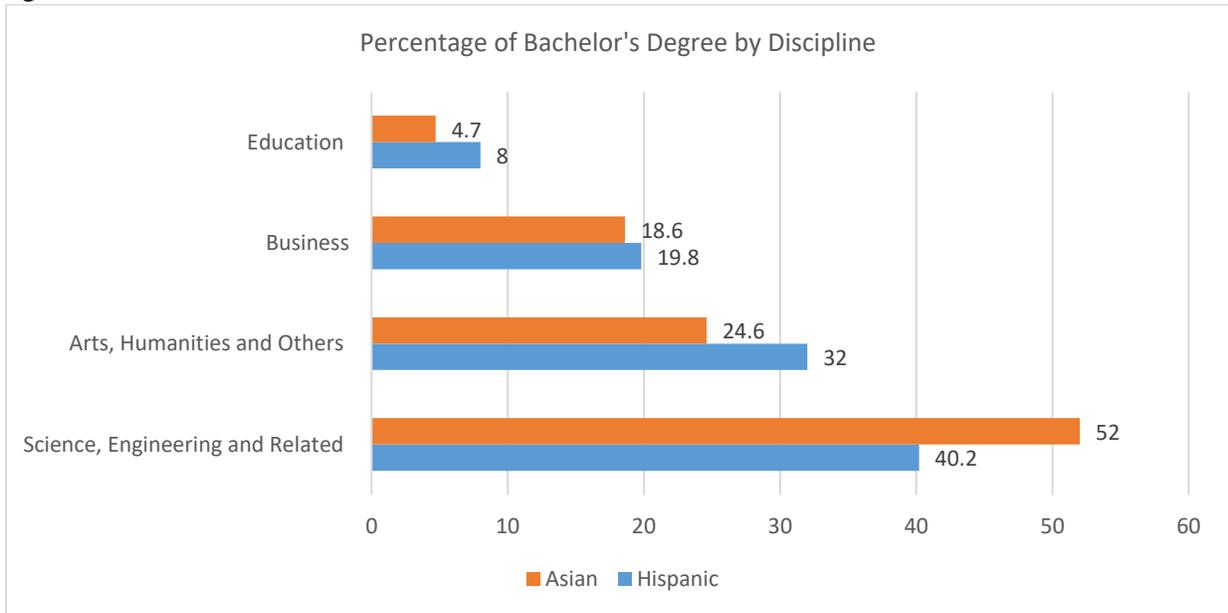
Source: Los Angeles County Economic Development Corporation (LAEDC), An Economic Profile of the Asian and Latino Community
 Demographic data on pages 2 through 5 were derived from the U.S. Census Bureau’s American Community Survey one-year estimates for Los Angeles County, 2015.
 Household expenditure data was derived from the U.S. Census Bureau’s 2015 Consumer Expenditure Survey for the western region.

Figure 9



Source: Los Angeles County Economic Development Corporation (LAEDC), An Economic Profile of the Asian and Latino Community
 Demographic data on pages 2 through 5 were derived from the U.S. Census Bureau’s American Community Survey one-year estimates for Los Angeles County, 2015.

Figure 10



Source: Los Angeles County Economic Development Corporation (LAEDC), An Economic Profile of the Asian and Latino Community
 Demographic data on pages 2 through 5 were derived from the U.S. Census Bureau’s American Community Survey one-year estimates for Los Angeles County, 2015.

Table 11

(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	School				Low	Jobs	Environmental Health Index
	Low Poverty Index	Proficiency Index	Labor Market Index	Transit Index	Transportation Cost Index	Proximity Index	
Total Population							
White, Non-Hispanic	57.93	66.39	68.23	81.08	82.87	47.60	17.72
Black, Non-Hispanic	27.68	35.38	32.64	85.39	88.08	46.67	9.12
Hispanic	25.84	41.88	32.80	84.89	87.23	43.10	12.09
Asian or Pacific Islander, Non-Hispanic	43.16	55.02	54.13	84.83	87.77	46.88	12.88
Native American, Non-Hispanic	37.48	50.46	45.47	83.58	86.17	46.39	14.83
Population below federal poverty line							
White, Non-Hispanic	46.73	61.43	60.25	85.00	87.84	47.10	13.62
Black, Non-Hispanic	18.53	30.29	24.51	87.01	89.53	45.30	8.21
Hispanic	17.65	37.54	28.17	86.70	89.79	44.56	9.49
Asian or Pacific Islander, Non-Hispanic	34.48	53.09	49.34	88.18	92.15	49.66	8.49
Native American, Non-Hispanic	20.52	40.60	33.38	87.46	91.04	48.99	8.23
(Los Angeles-Long Beach-Anaheim, CA) Region							
Total Population							
White, Non-Hispanic	65.34	68.73	67.34	76.59	79.87	46.74	38.36
Black, Non-Hispanic	36.77	37.95	36.13	81.34	83.42	46.12	23.65
Hispanic	36.01	43.05	35.43	80.65	83.98	43.16	25.56
Asian or Pacific Islander, Non-Hispanic	55.68	64.53	57.42	78.82	82.35	45.30	31.29
Native American, Non-Hispanic	48.97	52.60	48.40	78.04	81.53	44.84	33.60
Population below federal poverty line							
White, Non-Hispanic	53.04	61.26	59.07	80.43	84.23	48.46	32.62
Black, Non-Hispanic	23.71	30.73	26.45	83.34	85.48	44.58	21.67
Hispanic	24.25	37.27	28.83	83.28	86.96	43.89	21.76
Asian or Pacific Islander, Non-Hispanic	45.15	58.20	50.53	82.27	86.69	47.52	27.36
Native American, Non-Hispanic	32.13	38.92	34.86	80.82	84.18	47.51	25.97

Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA Refer to the Data Documentation for details (www.hudexchange.info).

For the protected class groups HUD has provided data, describe how disparities in access to employment relates to residential living patterns in the jurisdiction and region.

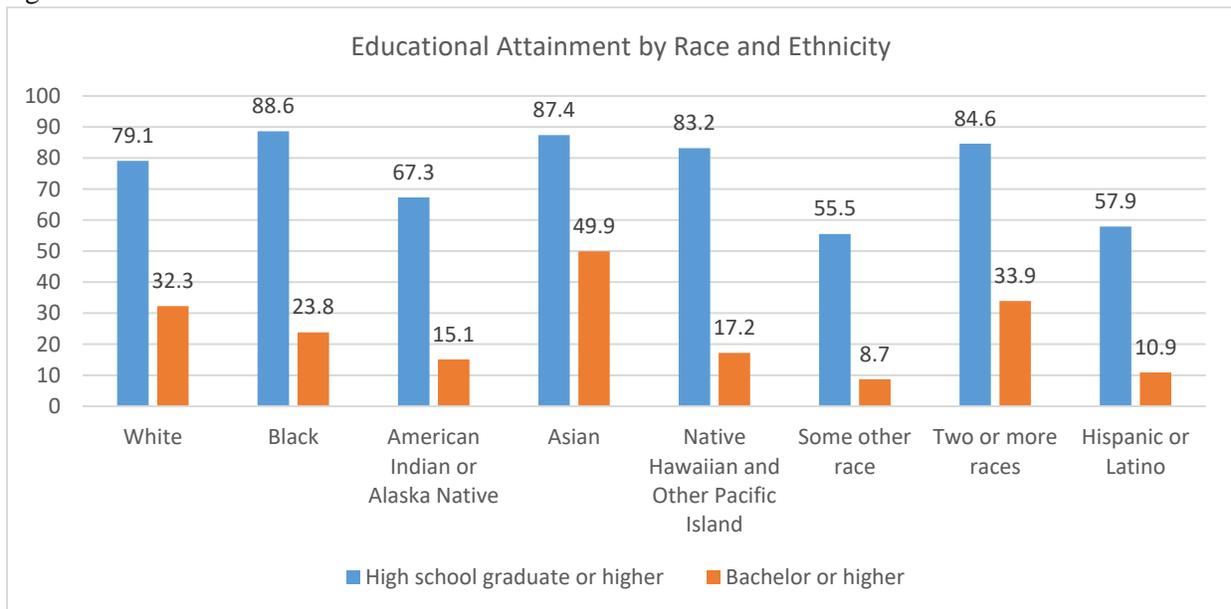
Educational attainment is a critical factor in determining levels of access to opportunities in the labor force. Education often predicts an individual’s risk of unemployment, ability to move into higher wages, and poverty status. In the City of LA, Black and Hispanic individuals often reside in areas with lower access to proficient schools, low engagement with the labor force, and higher rates of poverty (Table 11). More often employment today is tied to high skill levels associated with higher educational attainment. Individuals without higher levels of education have fewer options for employment and primarily seek low wage jobs.

As demonstrated by the HUD provided data in Table 11, the Jobs Proximity Index measures the accessibility of a neighborhood as a function of its distance to jobs, the higher the index value, the better access to employment opportunities. Hispanics had lower scores within the City and across the region. Scores remained consistent even when controlling for income, indicating that Hispanics tend to live in neighborhoods that are not near employment centers across income levels. A higher share of Hispanics can be found in East LA. Although East LA has better access to transportation as compared to other parts of the City, the Jobs Proximity Index indicates that East LA does not have many employment opportunities. On the other hand, the R/ECAPs located in the Harbor area in the southern part of the City exhibit high access to employment with job proximity scores ranging from 85-95. The Valley and West LA, which are predominantly White, also have high shares of census tracts with low accessibility to employment centers. This trend is also consistent with the lack of public transportation in these areas. Although there is high proximity to employment centers in some predominantly Hispanic neighborhoods, the Labor Market Index (Maps 1, 4-7 & Table 11) illustrates a stark divide in labor market engagement and human capital in a neighborhood. The same groups that have lower job proximity scores also have lower rates of labor market engagement. Low-income Black and Hispanic individuals below the federal poverty level have significantly

lower rates of access to opportunity within the labor market. Education is intimately tied to a person's ability to secure employment. A higher share of Asians, as shown in Figure 12, obtain a Bachelor's degree or higher. Alternatively, Hispanic and Black adults have lower educational attainments although Hispanic and Black women obtain a Bachelor's degree or post-graduate degree at slightly higher rates than their male counterparts (Figure 13).

The same areas in the City that have low educational attainment are also areas with high concentrations of poverty. Map 14 shows a clear pattern in South LA and to a lesser degree, portions of the Valley that receive a low score in the Low Poverty Index, indicating high poverty levels. This pattern is further confirmed by the City's Economic & Workforce Development Department's (EWDD) Annual Plan, which states that low educational attainment is coupled with higher rates of unemployment and poverty. Based on the most recent study from the 2016 – 2017 program year, nearly 25% of the population in LA City and County has less than a high school diploma.¹⁰⁴ Furthermore, according to the 2016 – 2017 report, approximately 40% of families living below the poverty level are female headed households with children under the age of 18. According to the EWDD, LA County experienced a loss of more than 330,000 jobs as a result of the 2008 recession, causing the unemployment rate to peak at 12.5%. The County started to see job recovery in 2015; however, these gains have not been sufficient to keep pace with growth in the size of the labor force. Recovery from the recession has been intimately connected to the extent of a particular industry's decline as a result of the recession.¹⁰⁵

Figure 12



Source: 2011-2015 American Community Survey (ACS) 5-year Estimate

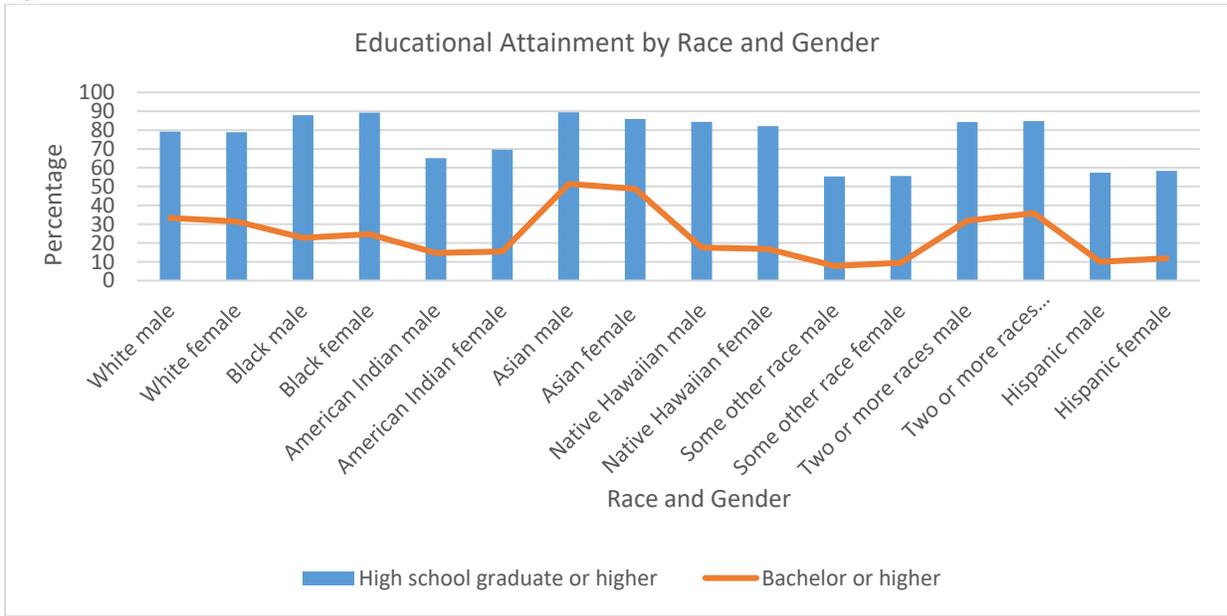
¹⁰⁴ 2015-2020 Los Angeles: People, Industry and Jobs, May 2016

http://laedc.org/wp-content/uploads/2016/05/People-Industry-and-Jobs_20160515.pdf.

¹⁰⁵ 2015-2020 Los Angeles: People, Industry and Jobs, May 2016

http://laedc.org/wp-content/uploads/2016/05/People-Industry-and-Jobs_20160515.pdf.

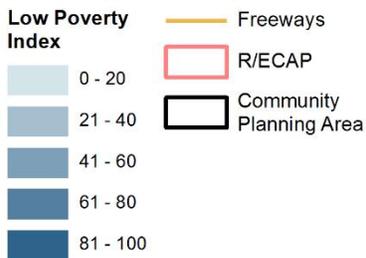
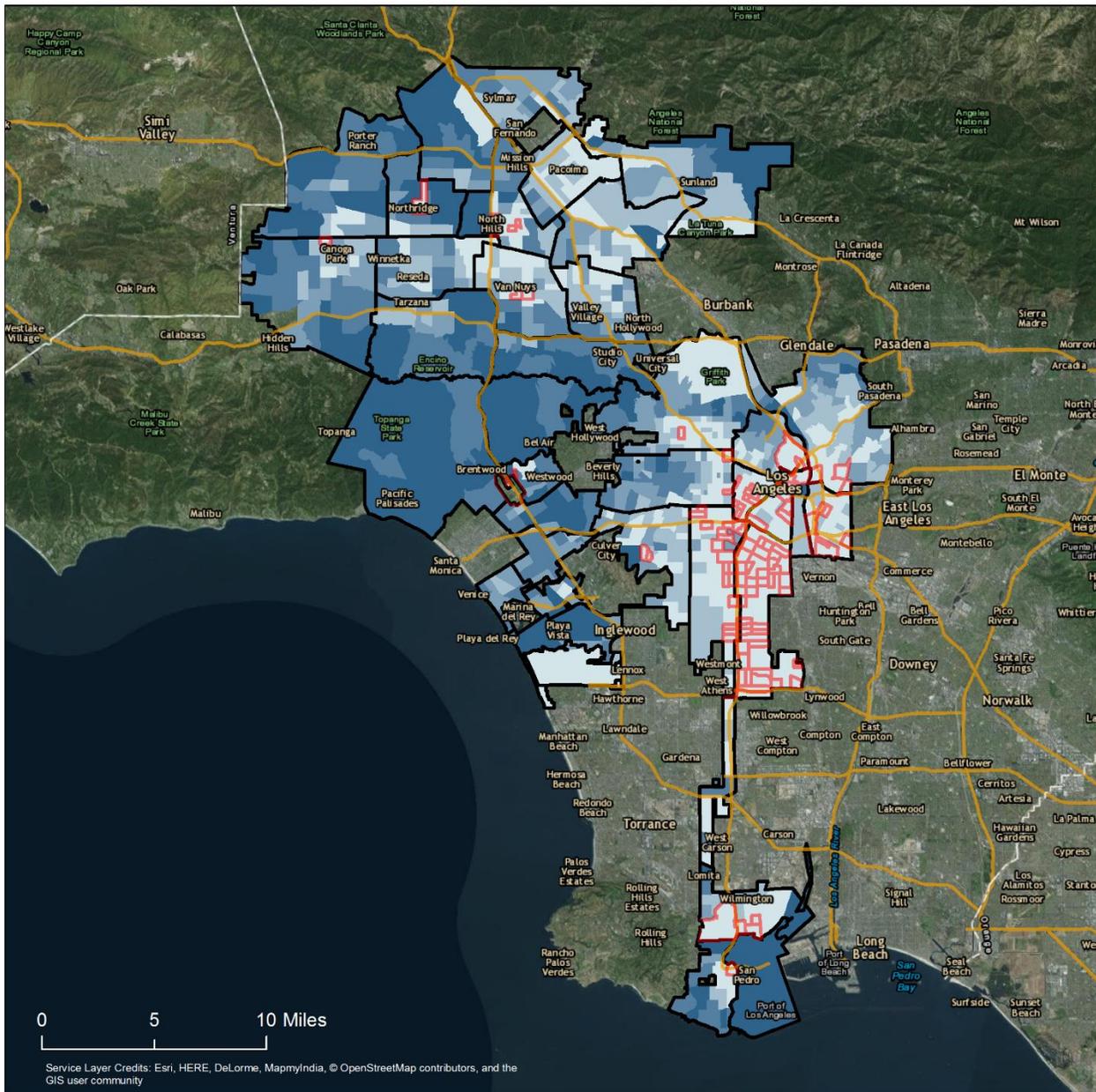
Figure 13



Source: 2011-2015 American Community Survey (ACS) 5-year Estimate

Map 14

City of Los Angeles: Low Poverty Index



Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

Although the Los Angeles region saw overall growth in May 2017 with 13,600 new jobs, industries that have jobs for low skilled workers such as Leisure and Hospitality and Retail saw declines.¹⁰⁶ Sectors such as Government, particularly local government, and information sectors continued to report gains. California's overall job growth has steadily declined and is below the national growth rates. Two factors contributing to the slowdown include the region's skill mismatch, which is making it difficult for employers to find candidates for skilled positions, and the region's high housing costs, which makes it harder for employers to fill low paying jobs. From 2015 to 2020, the LA regional economy is projected to add 346,000 new jobs, with a total of 123,000 new jobs within the City.¹⁰⁷ Industries projected to grow include office and administrative support jobs, food preparation and serving positions, and healthcare (Table 16). Additionally, industries targeted for economic and workforce development initiatives include construction, manufacturing specific to fashion, aerospace, analytical instruments, pharmaceuticals and medical devices, trade and logistics, entertainment and info-tech, health services, and leisure and hospitality. Looking at Table 16 and Figure 17, more than half of the jobs within LA City and County are in service providing industries.

Table 16

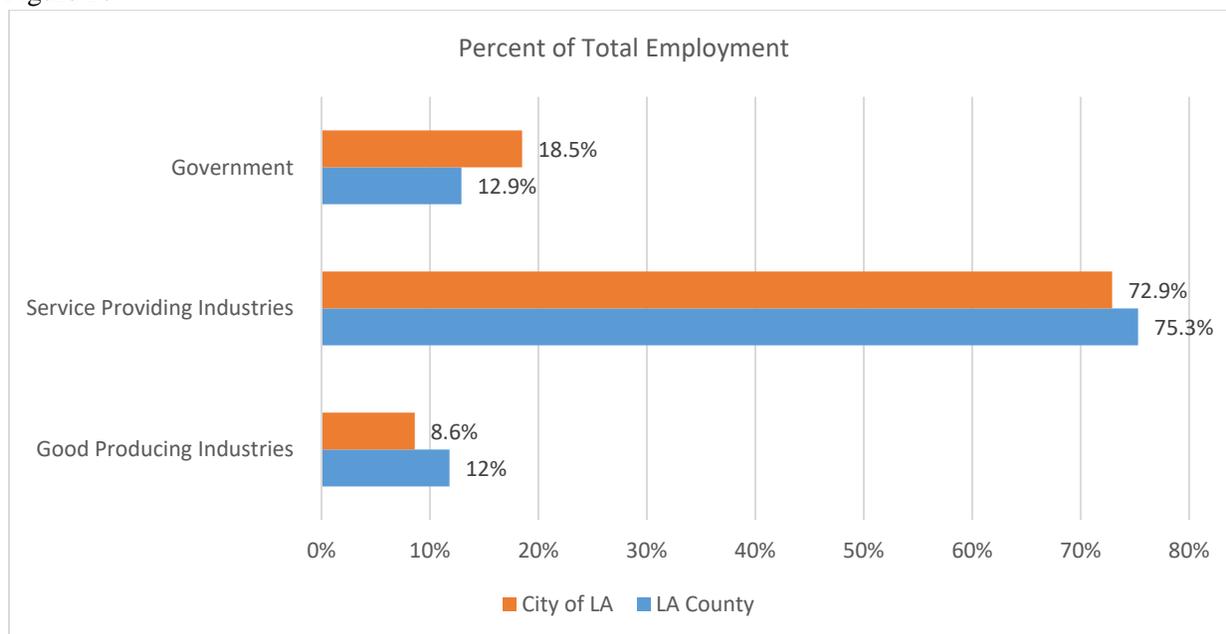
Occupational Growth in Los Angeles County 2015 - 2020			
Occupational Group	New Jobs	Replacement	Total
Management Occupations	15,420	18,490	33,910
Business and Financial	15,720	18,210	33,930
Computer and Mathematical	10,050	8,540	18,580
Architecture and Engineering	4,700	7,320	12,020
Life, Physical, Social Science	2,180	3,250	5,430
Community and Social Services	7,840	7,320	15,160
Legal Occupations	2,970	2,290	5,260
Education, Training, and Library	8,980	11,420	20,400
Arts, Entertainment, and Sports	5,440	10,280	15,720
Healthcare Practitioners	24,660	18,470	43,130
Healthcare Support	15,720	10,560	26,270
Protective Services	6,690	7,800	14,490
Food Preparation and Serving	40,750	73,930	114,680
Building/Grounds Maintenance	17,550	11,630	29,180
Personal Care and Service	20,380	19,150	39,530
Sales and Related	17,990	63,010	81,000
Office and Administrative	52,360	63,410	115,770
Farming, Fishing, and Forestry	220	560	780
Construction and Extraction	14,440	8,190	22,620
Installation, Maintenance/Repair	8,400	15,130	23,540
Production	11,470	24,190	35,660
Transportation/Material Moving	17,190	26,260	46,450
Total	321,120	429,410	753,510

Source: California Employment Development Department (QCEW) and LA Economic Development.

¹⁰⁶ Beacon Employment Report: https://beaconecon.com/products/employment_report.

¹⁰⁷ 2015-2020 Los Angeles: People, Industry and Jobs, May 2016
http://laedc.org/wp-content/uploads/2016/05/People-Industry-and-Jobs_20160515.pdf.

Figure 17



Source: California Employment Development Department (QCEW) and LA Economic Development.

During the Transportation and Jobs focus group meetings, held on January 10, February 1, and February 22 – 23, advocates who work with communities on workforce development and job placement confirmed these trends. During the focus group meeting, it was noted that public housing residents face many barriers to accessing jobs. Criminal history, lack of resources to buy professional clothes for an interview, and low skills and high illiteracy rates are common barriers faced by public housing residents. These barriers are mitigated with programs often located on-site via HACLA's Watts/Los Angeles WorkSource Center which provides opportunities for employment seekers to build formal employment networks, particularly for hard-to-hire populations who have barriers to employment entry. The Watts/Los Angeles WorkSource Center serves residents who live in government-assisted housing as well as residents who do not. The funding the Watts/Los Angeles WorkSource Center receives comes from the City of Los Angeles' Economic Workforce Development Department as well as from LA County for various populations like foster youth, homeless youth, out-of-school youth, individuals with criminal records, and adults with multiple barriers to employment. The Watts/Los Angeles WorkSource Center offers job training, job readiness, and job placement, along with other supportive services like transportation and professional attire. Although HACLA offers services to all residents regardless of what site they reside and where certain services may be offered, the Watts/Los Angeles WorkSource Center is not located at all public housing communities. Access to these services is advertised at all computer lab locations as a point of entry, but, due to limited staff, most services are offered at the Watts/Los Angeles WorkSource Center. Other wrap-around support services are provided on a referral basis by off-site area agencies that can connect individuals to resources tailored to more specific needs. For families participating in the Housing Choice Voucher (HCV) program, the Housing Authority operates a Family Self Sufficiency (FSS) Program. Families are not added to the waiting list under this program; they may volunteer to participate in this program after admission in to the HCV program. Under the FSS program, low-income families are provided opportunities for education, job training, counseling, and other forms of social service assistance, while living in assisted housing, so that they may obtain the education, employment, and business and social skills necessary to achieve self-sufficiency.

Lack of digital literacy among public housing residents is also a common barrier. In 2013, 84% of all U.S. households had a computer at home, and 74% had access to the internet at home.¹⁰⁸ However, this varies greatly across income levels, and low-income renters, particularly those utilizing federal housing programs such as public housing, are the least likely to have access to technology in their homes. Up to 37% of extremely low-income renters do not have a computer at home, and 54% do not have internet access at home. For renters with income between 31-50% AMI, 29% of households had a computer at home, and 46% had internet access. In a technology driven workforce, lack of digital literacy can be a significant barrier to accessing employment. Currently, HACLA is part of a cohort of pilot communities under the ConnectHome initiative focused on closing the digital divide among public housing residents. Under ConnectHome LA, HACLA will serve six public housing communities with households with K-12 students, including Avalon Gardens, Gonzague, Nickerson Gardens, Pico/Las Casitas, Ramona Gardens, and Rancho Sand Pedro. As part of the ConnectHome LA Initiative, families will receive free computers and up to four years of internet access.

Other barriers include not having affordable child care for those who have shift jobs that pay minimum wage, whose work schedules fluctuate based on job type, and who are unable to afford child care due to low wages. Frequent moves by residents can also create barriers to accessing employment. If residents secure employment in a different area from where they currently reside, they may request a transfer to a public housing location closer to the employment. Regular routine transfers are on a first-come, first-served basis based upon the availability of vacant units of the appropriate bedroom size. Given HACLA's low vacancy rates, however, such transfers are not granted immediately. Priority for transfers is given to those who require a reasonable accommodation or need to be moved due to an emergency health concern or safety risk.

Another advocate that attended the Transportation and Jobs focus group meeting reported that HCV tenants who live in areas with limited public transportation, such as West LA and South-Central LA, have further difficulties accessing education and employment services. Examining Maps 18 and 19, there are significant numbers of HCV recipients residing in South LA, in neighborhoods such as Vernon Central, South Park, Florence-Firestone, and Vermont Knolls. Looking at Map 20, the same area in South LA is serviced by Metro rail and bus lines. The Metro Rapid Bus is the primary source of public transportation and offers limited transfer points to Metro rail lines or other Bus Rapid Transit (BRT) lines. Using the Metro Rapid bus lines, residents in this area can transfer to the Expo rail line near West Vernon, the Blue line near Vernon Central, which then extends into LA County, or the Green line further South near Figueroa Park Square. Close to the South Park neighborhood, residents have the most optimal access with transfer points to the BRT Silver line and two Metro rail lines, including the Expo line. For residents in this area that are reliant on public transportation to access employment, doing so requires coordinating between multiple points of connections and schedules with a combination of bus and rail lines. Another advocate who works overwhelmingly with Black and Hispanic transgender women pointed out the lack of social services geared toward transgender individuals. Many transgender and gender non-binary individuals lack employment history or have long gaps of not working and turn to the survival street economy for sources of income. As a result, many end up with criminal histories that further isolate them from the mainstream job market.

¹⁰⁸ National Housing Conference. Broadband Connectivity in Affordable Housing, http://docs.wixstatic.com/ugd/19cfbe_cce833f477b54b498349d608d29a65ca.pdf, April 2015. Assessed on September 2017.

During the LGBTQ stakeholder meeting held on July 31st, advocates further confirmed the reliance of many transgender and gender non-binary Angelenos on street economy jobs due in large part to the lack of opportunities based on gender identification. Advocates indicated that services, such as shelter facilities and domestic violence resources, often are not open to transgender and gender non-binary individuals due to cisnormative policies that do not accommodate unique needs of the transgender and gender non-binary community. Often shelter facilities are segregated based on gender, and policies are not flexible enough to accommodate transgender and gender non-binary individuals. In September 2017, the Los Angeles Homeless Services Authority (LAHSA) approved policy changes specifically to address equal access based on gender identity in LA's Continuum of Care.¹⁰⁹ Based on the HUD mandate to ensure equal access for transgender and gender non-binary individuals, LAHSA has expanded the equal access policy to six service areas, including access to sex-segregated services and facilities, access to family programs and facilities, access to bathrooms, ensuring safety and privacy, use of names and personal gender pronouns, and Homeless Management Information System (HMIS) data collection and intake forms. Under the new policy all programs, shelters, facilities, benefits, services, and accommodations funded by LAHSA must provide equal access in accordance with an individual's gender identity.

Advocates indicated the need for increased funding for organizations such as LA Transgender Advisory Council to provide multidisciplinary resource centers that provide housing, employment, and legal services that address the specific needs of this population. Based on the 2015 National Transgender Survey, the unemployment rate for transgender individuals is twice as high as that of the public, and the rate is almost four times as high for transgender persons of color.¹¹⁰ More than one-third of respondents for the 2015 National Transgender Survey indicated having a full-time job. As demonstrated in Table 21, 2% of survey respondents indicated that they were currently employed through sex work, selling drugs, or doing other work in the underground economy; however, up to 60% of these respondents indicated that they were looking for legal employment. According to survey results, transgender individuals were twice as likely to be living in poverty and three times likely to have household incomes below \$10,000. Transgender individuals of color, undocumented persons, individuals with disabilities, and those living with HIV disproportionately experienced unemployment. This further threatened their economic stability as these same groups were also more likely to live in poverty and have extremely low incomes. Workplace mistreatment and harassment are common for transgender individuals. Along with the fear of being fired, many are forced out of their jobs, not hired for jobs because of their gender identity, and even face verbal harassment, being forced to present as the wrong gender or being physically attacked at work. Examining Table 22, up to 30% of respondents from the 2015 National Transgender Survey reported to being fired from their job within the past year, denied a promotion, or having experienced mistreatment at work due to their gender identity.

Overall, racial and ethnic minorities and LGBTQ individuals encounter several obstacles in accessing employment and services designed to help increase access to employment. Most common obstacles include residing in areas with concentrated poverty, lack of proficient schools in these same neighborhoods, low educational attainment, lack of access to services, and workplace discrimination. In the City, Black and

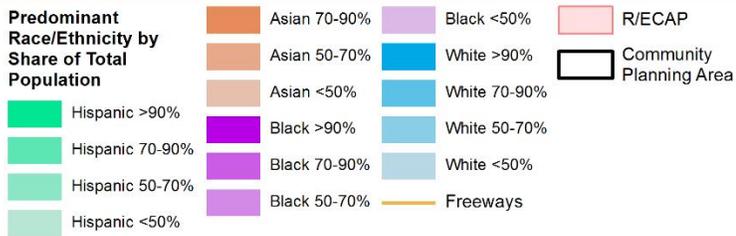
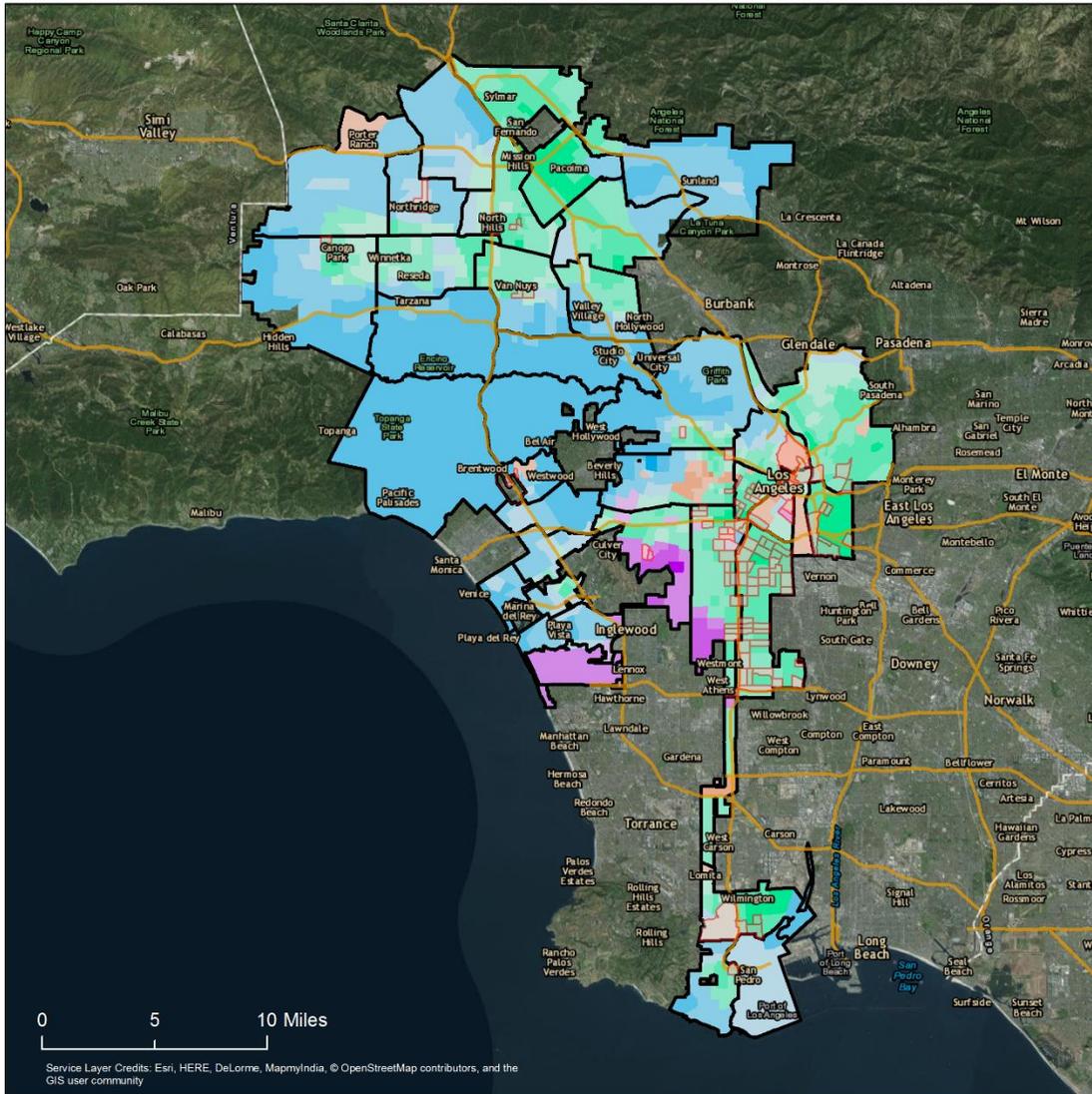
¹⁰⁹ Los Angeles Homeless Services Authority. Equal Access in Accordance with An Individual's Gender Identity in Los Angeles Continuum of Care Draft Policy, August, 2017, <https://www.lahsa.org/documents?id=1511-equal-access-draft-la-coc-policy-for-public-comment.pdf>. Assessed on September 2017.

¹¹⁰ National Center for Transgender Equality. *The Report of the 2015 U.S. Transgender Survey*, December 2016 <http://www.transequality.org/sites/default/files/docs/usts/USTS%20Full%20Report%20-%20FINAL%201.6.17.pdf>. Accessed August 2017.

Hispanic residents live in areas that have low Labor Market Index scores, which measures level of employment, labor force participation, and educational attainment in a census tract. Within the City, place of residence is an important indicator of employment. A higher share of Black and Hispanics live in parts of the City that have more segregation and poverty, such as Southeast LA where there are more R/ECAPs than any other part of the City (Maps 18 and 19). White and Asian residents live in areas with less poverty, proficient schools, and higher rates of educational attainment and employment, and have higher Labor Market Index scores (Map 7 and 18). Neighborhoods like Wilshire and Koreatown have lower Labor Market Index scores and include concentration of Korean and Filipino residents, but, unlike Black and Hispanic residents, Koreans and Filipinos can also be found to be residing in other areas with higher Labor Market Index scores, such as West LA and the Valley. Comparing the City's foreign-born populations, there is a sizeable difference in educational attainment between Hispanics and Asians (Figure 9). Higher educational attainment is closely linked to accessing the labor market and up to 40% of Hispanic school age youth are not completing high school and not moving on to college. Although there are workforce services available, members of protected classes continue to face barriers in accessing these services.

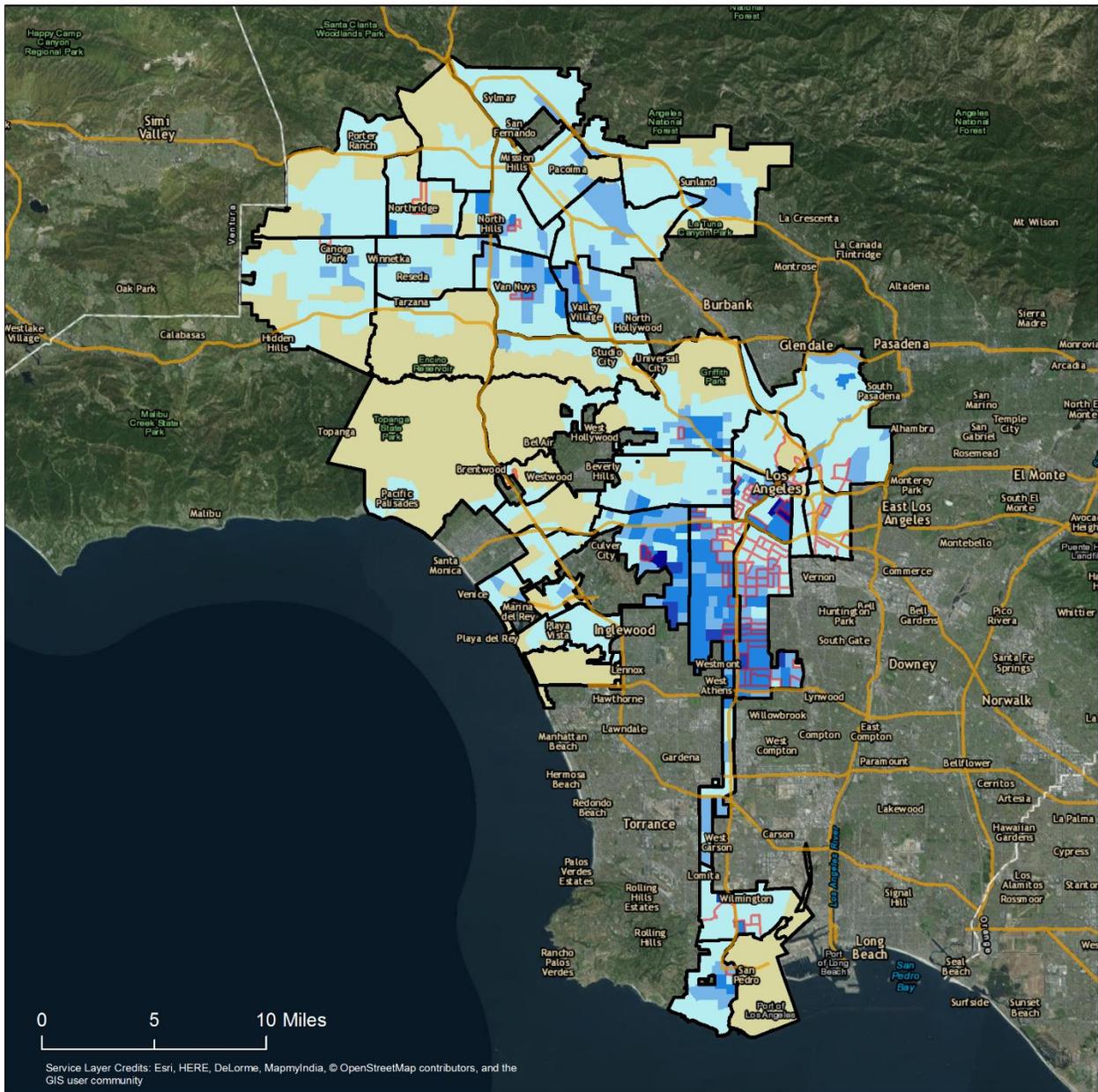
Map 18

City of Los Angeles: Predominant Race/Ethnicity, 2010



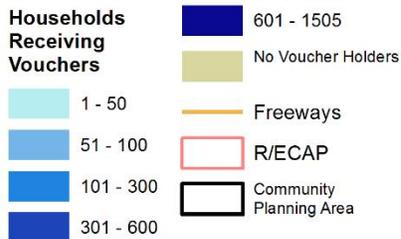
Map 19

City of Los Angeles: Number of Households Receiving Housing Choice Vouchers



0 5 10 Miles

Service Layer Credits: Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community



Map 20

City of Los Angeles: Transit Lines

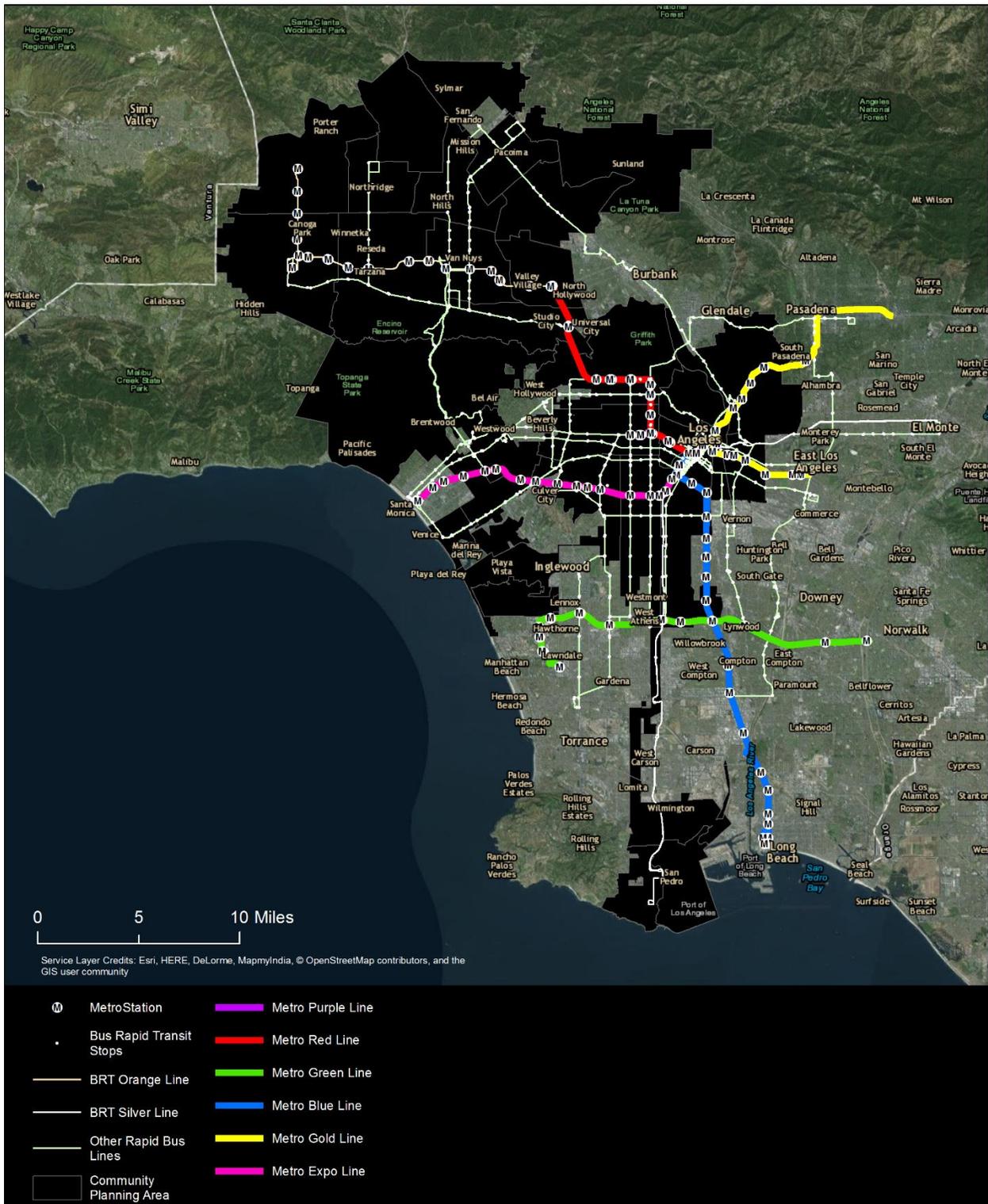


Table 21

Employment Status	Percentage of Respondents (Supplemental Weight)
Work full time for an employer	35%
Work part time for an employer	15%
Self-employed in own business, profession or trade, or operate a farm (not including underground economy)	15%
Retired	14%
Not employed due to disability	13%
Student	11%
Unemployed but looking for work	11%
Unemployed and have stopped looking for work	5%
Homemaker or full-time parent	3%
Work for pay from sex work, selling drugs, or other work currently criminalized	2%
Not listed above	4%

Source: 2015 U.S. Transgender Survey

Table 22

Reasons for Loosing Job	Percentage of Those Who Have Ever Lost a Job	Percentage of Those Who Have Been Employed
Age	7%	4%
Disability	13%	7%
Income level or education	5%	2%
Gender identity or expression	30%	16%
Race or ethnicity	5%	3%
Religion or spirituality	2%	1%
Sexual orientation	13%	7%
None of the above	61%	32%

Source: 2015 U.S. Transgender Survey

c. Transportation Opportunities

Disparities in Access to Transportation Based on Residence, Cost or Other Transportation Related Factors

HUD's Transit Trips Index, as shown in Map 1, makes it apparent that Downtown LA and the southern part of Central LA boast the City's highest access to public transportation, including access to Metro stations, multiple rail lines, and stops for both bus and Bus Rapid Transit (BRT) lines. There are up to 20 R/ECAPs concentrated in this same area. This network of public transportation offers critical connections between East and Central LA and the Valley and Harbor areas. Additionally, the Metro Expo line also provides connections to West LA. The Transit Trips Index reflects estimates from the Location Affordability Index of the number of transit trips by a three-person single parent family with a household income at 50% of the median income for renters for the region. Values in the Transit Trip Index range from 0 – 100, and higher values are associated with census tracts where more residents utilize public transportation and have better access to transit.

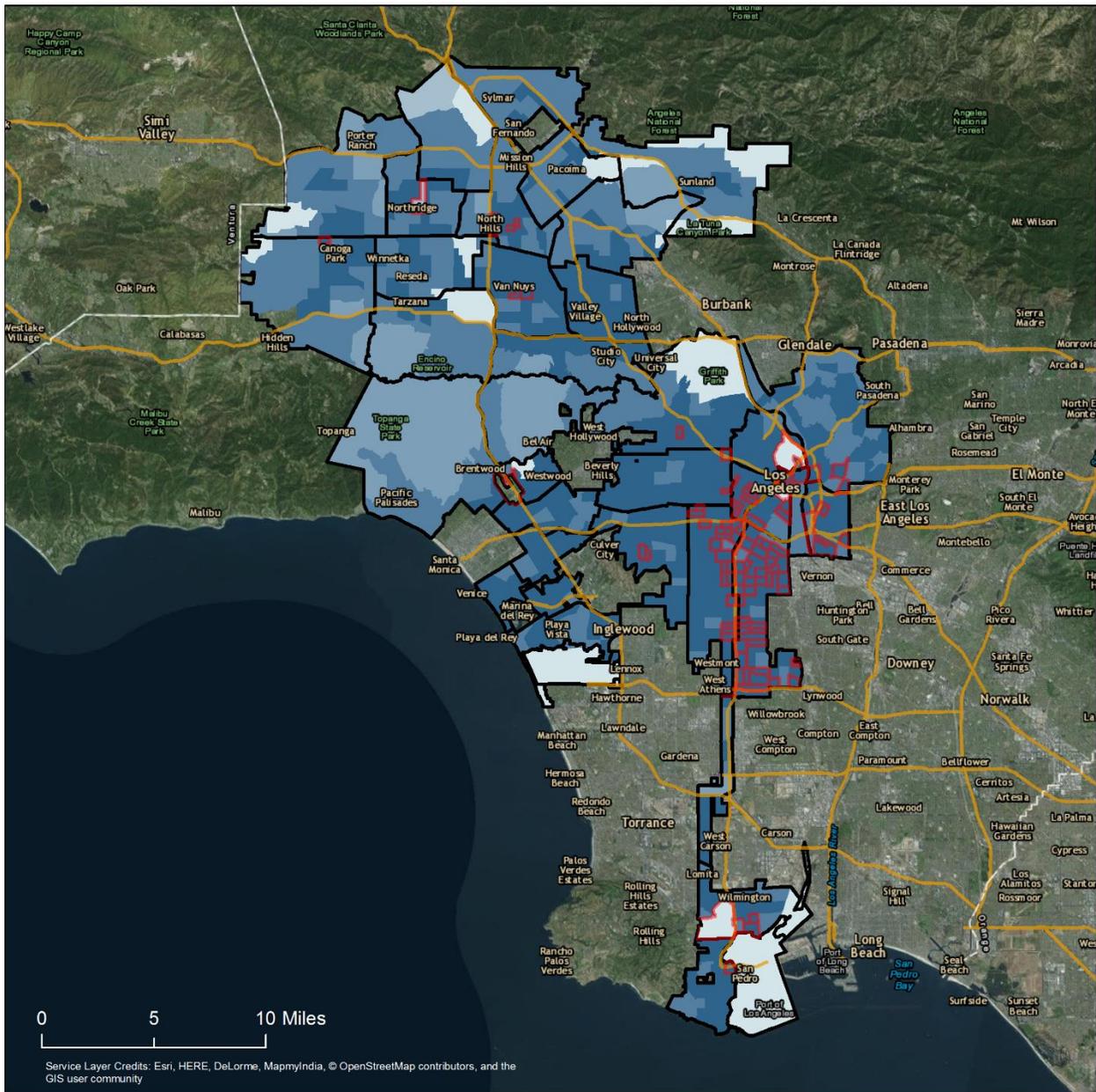
The base fare for a single ride on the LA Metro is \$1.75 with reduced fares available to seniors, persons with disabilities, and K – 12 students. A single fare will allow a rider with two hours and allows for transfers within the LA Metro system. A 30-day pass on the LA Metro costs \$100.¹¹¹ Additional charges apply for the Metro Silver Line, the only line extending to San Pedro, and Metro Express Buses. For an average household, transportation is often the second biggest expense behind housing. Combined, housing and transportation can make up more than half of a household's annual expenses. As more low-income households get pushed out of urban core areas and into suburban areas due to high housing costs, the additional cost of transportation can easily override any housing savings.¹¹² On average, households in LA spend nearly 30% of their income on transportation, higher than the national average of 19%. Households in LA spend up to 55% of their income on housing and transportation combined. This can be a significant burden for low-income households, which disproportionately consist of protected class members. According to a recent survey conducted by Metro, the average income for respondents who rode the bus was below \$15,000, and the median income for train riders was slightly over \$26,000.¹¹³ Furthermore, up to 59% of bus riders are Hispanic. Hispanics use public transit more than any other demographic group and are particularly reliant on the bus to meet their transportation needs. On average, bus riders also have fewer choices in modes of transportation. Up to 45% of train riders had access to a vehicle as compared to only 25% of bus riders.

¹¹¹ Los Angeles County Metropolitan Transportation Authority <https://www.metro.net/riding/fares/>.

¹¹² Creating Successful Transit-Oriented Districts in Los Angeles: A Citywide Toolkit for Achieving Regional Goals, February 2010 http://media.metro.net/projects_studies/tod/images/CTOD%20-%20Creating%20Successful%20Transit-Oriented%20Districts%20in%20Los%20Angeles.pdf.

¹¹³ Metro Consumer Survey, http://media.metro.net/projects_studies/research/images/infographics/metro_infographic_02.pdf.

Map 1
City of Los Angeles: Transit Trips Index



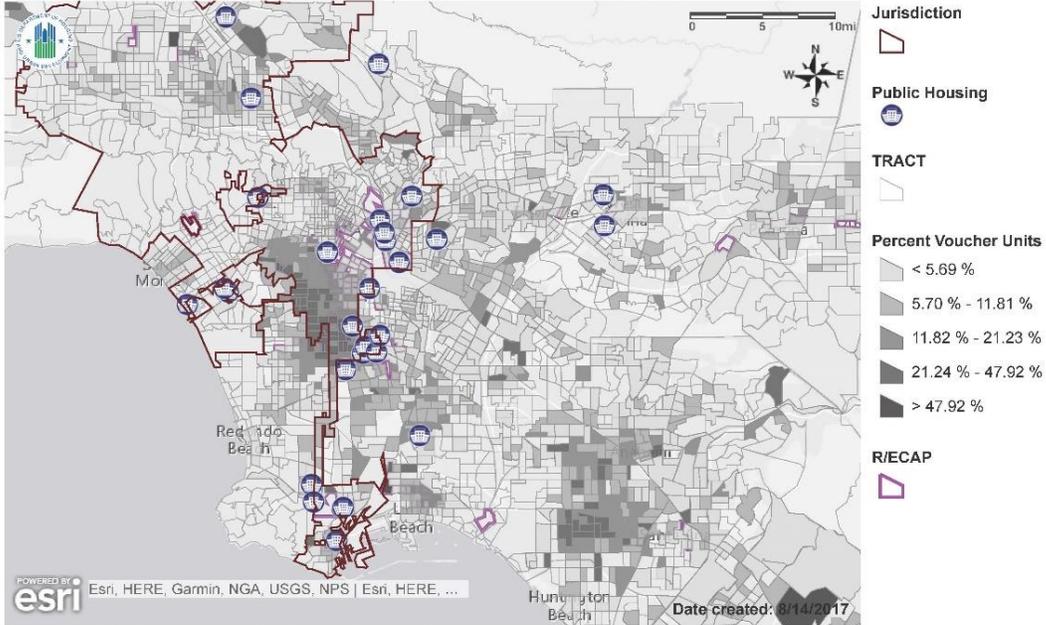
Which racial/ethnic, national origin or family status groups are most affected by the lack of reliable, affordable transportation between their place of residence and opportunities?

During the Transportation and Jobs Focus Group Meeting, stakeholders provided feedback on several issues pertaining to transportation. The first issue raised was the hours of operation for public transit and the lack of available public transportation to serve individuals working graveyard shifts. Without access to reliable transportation during shift hours early in the morning or late at night, it is difficult to secure employment that requires commuting. The lack of available transportation disparately limits access to employment for all protected classes who are disproportionately reliant on the public transportation system in LA. Specifically, this limits access to employment centers and other community amenities outside of the central core of the city. South and East LA also have high concentrations of publicly supported housing, which has a high representation of racial and ethnic minorities, as indicated by Maps 2 – 5 and Table 6.

Map 7 shows that there are also significant number of people with disabilities in areas with concentrations of R/ECAPs in South LA, East LA, and further north in the San Fernando Valley area. For individuals with disabilities, using public transportation can involve a time-consuming network of lines and transfers that is challenging to navigate, particular for individuals with mobility limitations. With multiple transfer points, it is critical that the transit user is on time, and missing one bus can easily result in a significant delay. Bus Rapid Transit such as the Orange Line in the San Fernando Valley can be transformative for transit dependent individuals. The Orange Line has arrival times that are accurate to within two to three minutes and operates on a dedicated busway with limited competing traffic, thus allowing commuters to consistently plan travel times. According to a study completed by Southern California Public Radio, KPCC, the Orange Line arrived late at stops just 5.4% of the time, unlike the majority of the bus lines in the system.

Map 2 Publicly Supported Housing and Race/Ethnicity for Public Housing

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



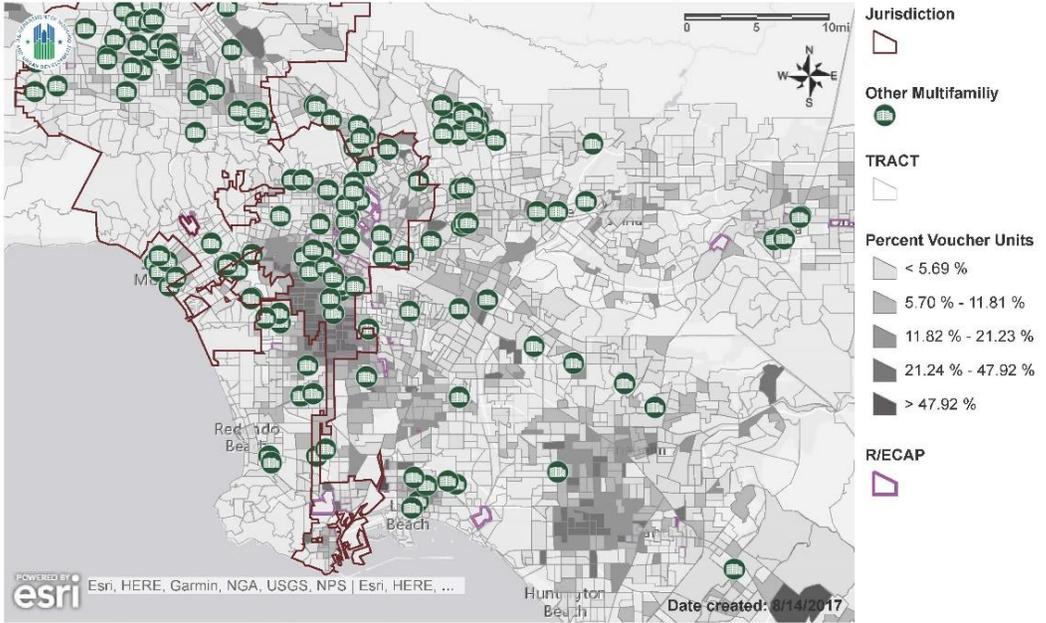
Name: Map 5 - Publicly Supported Housing and Race/Ethnicity

Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color
Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Map 3 Publicly Supported Housing and Race/Ethnicity for Other Multifamily

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

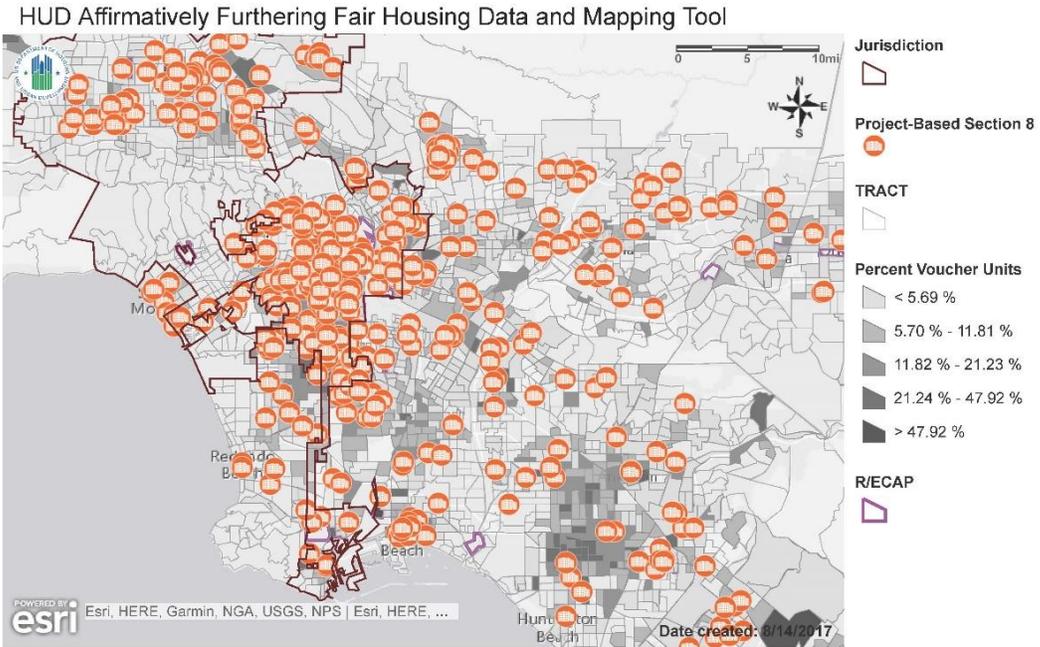


Name: Map 5 - Publicly Supported Housing and Race/Ethnicity

Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color
Jurisdiction: Los Angeles (CDBG, HOME, ESG)

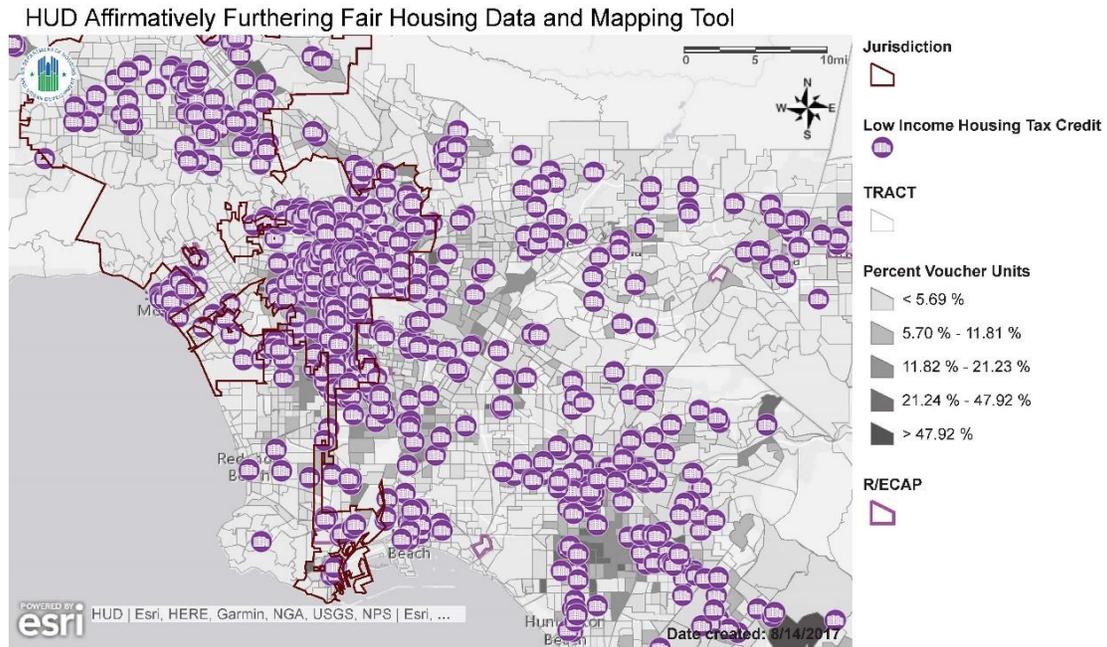
Region: Los Angeles-Long Beach-Anaheim, CA

Map 4 Publicly Supported Housing and Race/Ethnicity for Project-Based Section 8



Name: Map 5 - Publicly Supported Housing and Race/Ethnicity
Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color
Jurisdiction: Los Angeles (CDBG, HOME, ESG)
Region: Los Angeles-Long Beach-Anaheim, CA

Map 5 Publicly Supported Housing and Race/Ethnicity for Low Income Housing Tax Credit



Name: Map 5 - Publicly Supported Housing and Race/Ethnicity
Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color
Jurisdiction: Los Angeles (CDBG, HOME, ESG)
Region: Los Angeles-Long Beach-Anaheim, CA

Table 6

(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	223	3.17%	1,685	23.98%	4,918	69.99%	201	2.86%
Project-Based Section 8	4,382	21.58%	3,863	19.02%	5,617	27.66%	6,409	31.56%
Other Multifamily	851	30.13%	280	9.92%	672	23.80%	1,013	35.87%
HCV Program	9,449	22.10%	23,039	53.89%	9,005	21.06%	1,178	2.76%
Total Households	510,140	38.62%	146,570	11.10%	471,240	35.67%	162,019	12.27%
0-30% of AMI	73,675	25.53%	47,200	16.35%	126,635	43.88%	34,589	11.98%
0-50% of AMI	112,300	22.83%	70,530	14.34%	232,130	47.19%	54,289	11.04%
0-80% of AMI	181,610	25.11%	96,015	13.27%	338,220	46.76%	79,799	11.03%
(Los Angeles-Long Beach-Anaheim, CA) Region								
Housing Type								
Public Housing	683	6.99%	2,627	26.90%	6,110	62.56%	344	3.52%
Project-Based Section 8	9,154	23.86%	6,942	18.10%	10,365	27.02%	11,753	30.64%
Other Multifamily	1,707	33.38%	465	9.09%	1,094	21.39%	1,839	35.96%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	1,766,510	41.80%	333,080	7.88%	1,405,070	33.25%	629,349	14.89%
0-30% of AMI	215,775	29.59%	86,225	11.83%	305,885	41.95%	105,314	14.44%
0-50% of AMI	343,565	26.07%	135,740	10.30%	587,685	44.60%	175,814	13.34%
0-80% of AMI	590,895	28.77%	195,155	9.50%	905,370	44.09%	272,549	13.27%

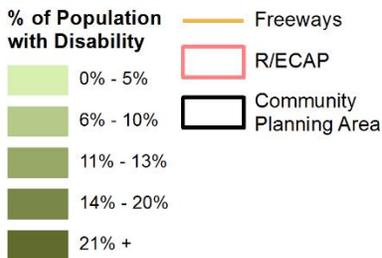
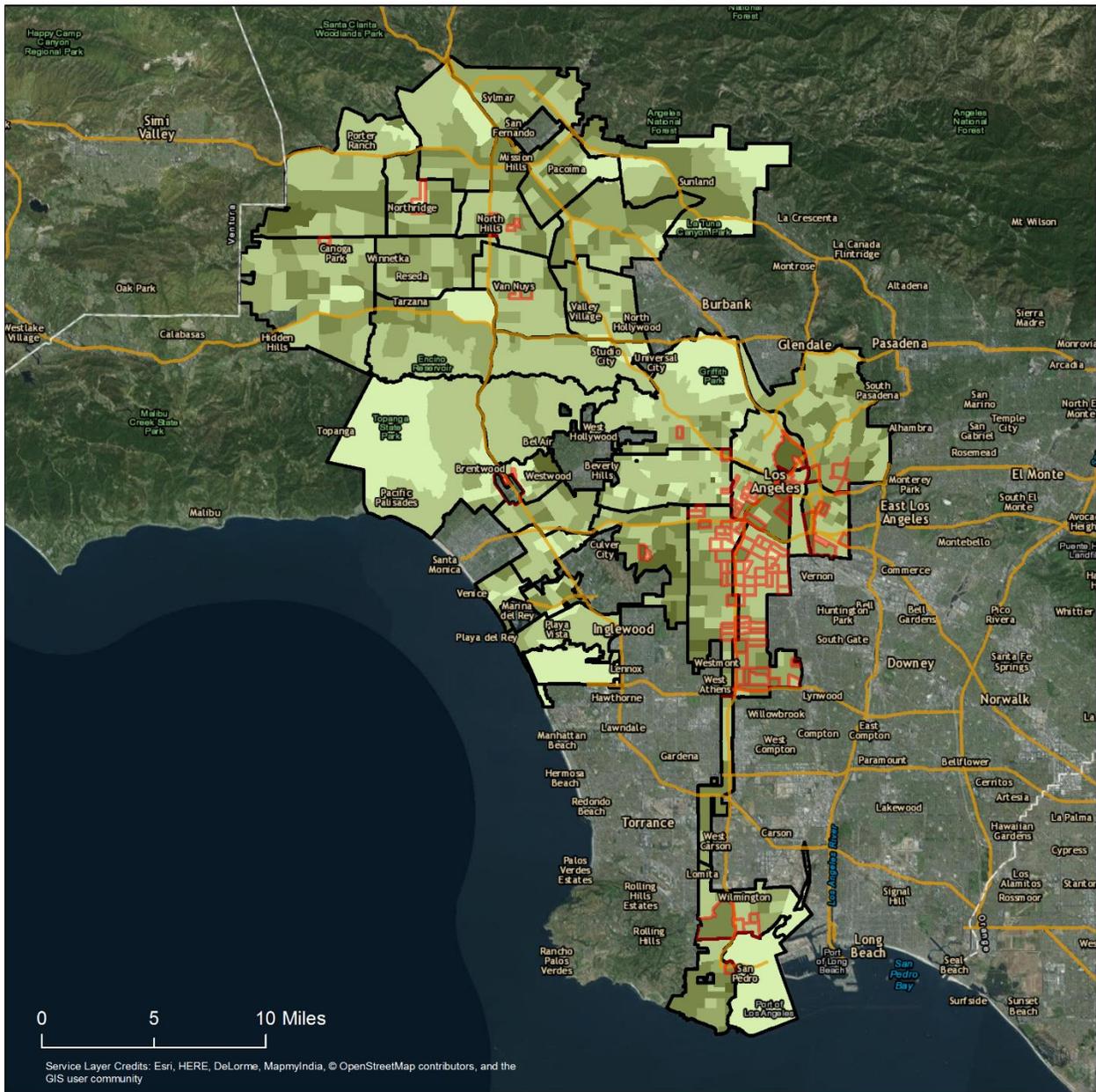
Sources: Decennial Census and CHAS

Numbers presented represent number of households not individuals

Refer to the Data Documentation for details (www.hudexchange.info)

Map 7

City of Los Angeles: Share of All People with a Disability



0 5 10 Miles

Service Layer Credits: Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user community

The second most pressing set of issues raised during the focus group was the cost of public transportation and the need to increase the availability of bus passes. Los Angeles Department of Transportation (LADOT) operates the Downtown Area Short Hop (“DASH”) bus lines. DASH offers reduced fares at \$0.50 in comparison to \$1.75 on the Metro; however, DASH does not offer connections evenly across the City. As Metro makes additional investments to expand public transportation, such as the Crenshaw/LAX line and the Purple line, housing in areas with new service is becoming increasingly unaffordable, and community members are seeing an uptick in displacement. As reflected in Map 8, the issue of displacement is exacerbated by the concentration of several affordable housing developments with expiring covenants in areas with the greatest access to public transportation, including portions of East LA and Central LA. ACT LA, a transit and affordable housing coalition of 32 community groups from around the City, also raised the issue of displacement near transit centers and the need to preserve access for low-income households simultaneously as more investments are made in the system overall. Like South LA, with a high concentration of racial and ethnic minorities, the Southwest section of East LA has a significant concentration of Hispanic households who are reliant on public transportation. Additionally, stakeholders raised issues concerning safety at stations during the community meeting. Based on feedback received from a social service provider that works with transgender individuals that attended the meeting, women and transgender patrons, specifically, have experienced harassment at stations at the hands of law enforcement. Patrons are discriminated based on appearance and the perception that they are participating in illicit behavior.

A study conducted by the Center for Transit Oriented Development projected that nearly two-thirds of the demand for public transportation in 2030 will be fueled by households earning less than the City’s median income, shown in Figure 9. Based on the current racial, ethnic, and socioeconomic composition of the City, this demand will be driven by Black and Hispanic households concentrated in South and by Hispanic households in the Central LA, East LA, and the San Fernando Valley. As indicated by the most recent Metro Customer Survey results, current riders are predominantly Hispanic (59% of bus riders and 45% of rail riders), and Black patrons make up 20% of bus riders and 21% of rail users. These same riders are also disproportionately low-income, and public buses and trains provide vital connections to opportunities outside of R/ECAPs (Map 8). Low-income households are less likely to have vehicles that enable them to adjust to lack of transportation or public transportation delays. In fact, if the transportation systems were better connected, a greater variety of users would use the system, and there would be a reduction in the number of driving trips. For low-income households, having access to affordable, reliable buses and trains can be the decisive factor in gaining employment and taking advantage of educational opportunities. It is critical for Metro’s core users that public transportation be accessible and accommodate the needs of persons with disabilities, while also taking passengers where they need to go and providing reliable service upon which they can depend.

As more investments are made to increase public transportation in the Valley, such as the possible Orange Line expansion currently under study and the Measure R transit line (Map 8), it is necessary to design transportation networks that are multimodal systems that maximize access and options, especially for non-drivers who may otherwise be isolated. In 2016, the City and Metro partnered to launch the Metro Bike Share program. The program includes 61 stations and locations selected by its proximity to employment centers, existing bike infrastructure to ensure road safety, along with other modes of transit. By aligning bike share locations with other community amenities, such as employment centers, the program provides critical first and last mile connections, picking up where public transportation stops. The Metro Bike Share program allows TAP users to register with their TAP card while also providing trips that are 30 minutes or

less at no cost and \$1.75 per 30 minutes thereafter. In 2014, the Valley-Westside Express was extended and replaced Lines 741 and 761 with improved service through the Metro Rapid Line 734 and Metro Rapid Line 744. The new lines offer better connections, fewer transfers, and more flexibility for Valley riders. Additionally, the Transit Access Pass (TAP) for Metro's new 1-Way Trip allows riders to reach most destinations on a single fare. The Valley Westside Express offers connections between Westwood and the Orange Line and can save riders up to 20 minutes. The Express uses the Sepulveda Pass through the new High Occupancy Vehicles (HOV) lanes on the 405 Freeway. The Express service operates Monday through Friday but only during peak hours. Outside of peak hours, Line 734 allows for faster service and round trips to locations between the Valley and the Westside. Unlike the Express, service on Line 734 operates Monday through Friday, with weekend, early morning, and late night services through the Metro Local Line 234 extension from Sherman Oaks to Westwood. Metro Rapid Line 744, which travels along the busiest corridors in the San Fernando Valley, provides critical connections to jobs and other amenities in the Valley. Service is limited to Monday through Friday along with modified weekend service.

Better coordinated, frequent, and reliable transportation is a needed amenity for many residents in the San Fernando Valley. Although the Valley does not have many public housing units, there are several Low-Income Housing Tax Credit (LIHTC) developments, along with Project Based Section 8 housing and other publicly supported multi-family housing (Maps 2 – 5). As previously shown in Map 7, the Valley has a number of older residents that are living with disabilities in areas encompassing Valley Glen, North Hollywood, Van Nuys, and West Van Nuys and extending further north to Lake View and Sylmar, areas that also exhibit higher rates of poverty (Map 10). As improvements to the transportation system are made that allow for better connections between people and places, the preservation of affordable housing becomes an acute issue. Once again, as displayed in Map 10, the same areas within the San Fernando Valley with transportation upgrades also have housing with affordability covenants that are expiring within 5-years. Additionally, areas within the City that have higher rates of poverty also have many affordable housing options for low income residents. HCV recipients can be found in areas with higher poverty, as demonstrated in Map 11, and these same areas are where many Rent Stabilization Ordinance (RSO) properties are located (Map 12). These areas are experiencing an uptick in Ellis Act evictions (Map 13). The Ellis Act evictions displayed in Map 13 shows the density of evictions throughout the City. The density is based on the number of Ellis evictions within a $\frac{3}{4}$ mile radius. Examining Map 13, areas with lower rates of poverty, such as Westwood, Century City, and West LA, that offer affordable options to HCV recipients (as displayed in Map 11) have seen high rates of Ellis evictions. This trend remains consistent in Central LA which exhibits the highest density in Ellis eviction units. Neighborhoods in Central LA, such as Hollywood, Hancock Park, the Westlake District, and Downtown, which have high levels of transit, are rapidly losing many of their affordable housing options. However, in neighborhoods to the south such as South Park, Vermont Knolls, and Green Meadows, that have much higher rates of poverty, concentrations of R/ECAPs, and a significant number of RSO units, are seeing fewer Ellis evictions compared to other parts of the City. Central LA and South LA encompass neighborhoods that boast some of the City's best access to public transportation and these areas have historically been affordable to low income residents. Many of the City's affordable housing options, through publicly supported housing (Maps 2-5), HCV (Map 11), and RSO units, are located in neighborhoods experiencing high turnover with many residents experiencing displacement due to the loss of available affordable housing with access to transit (Table 15).

Map 8

City of Los Angeles: Transit Lines

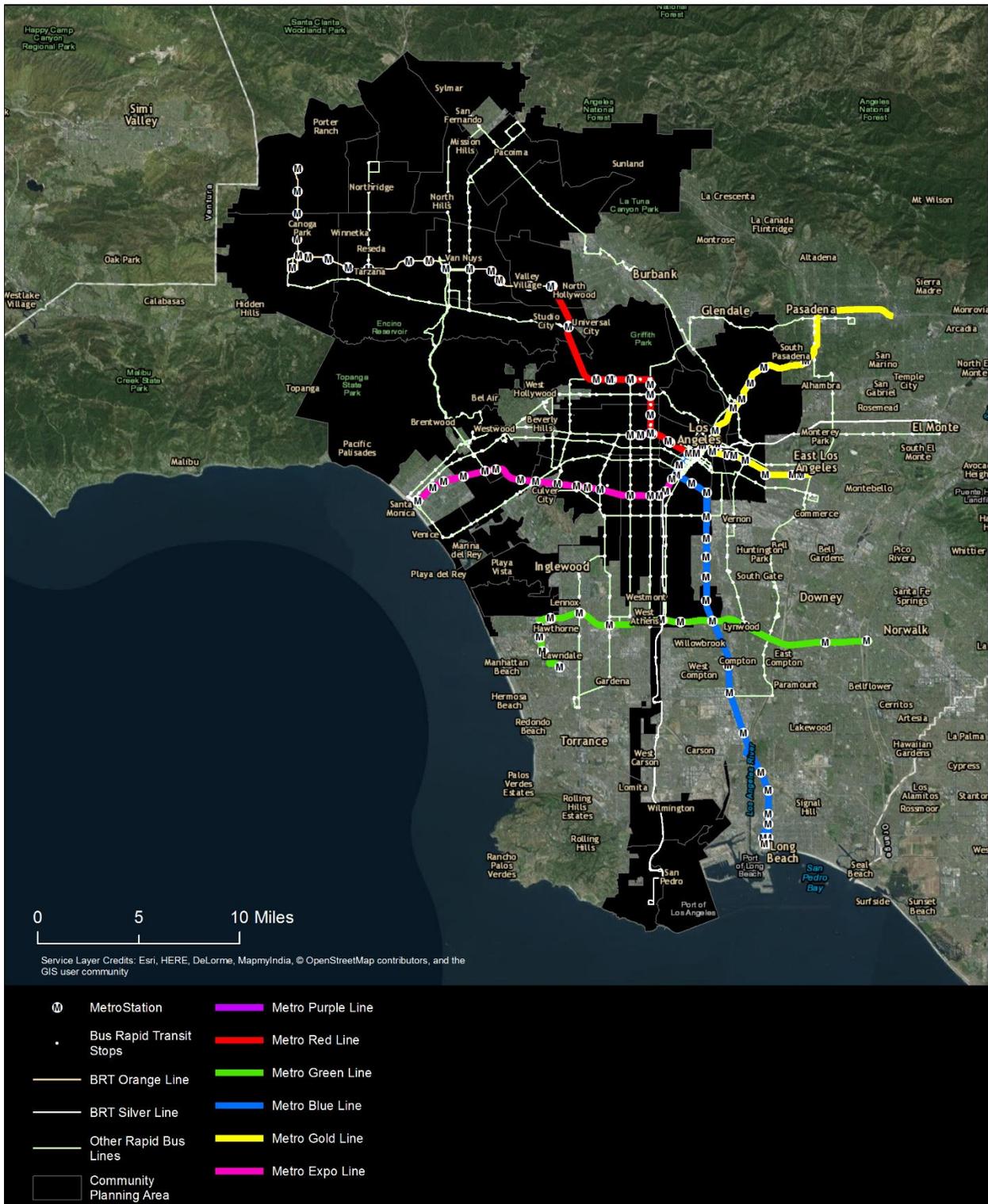
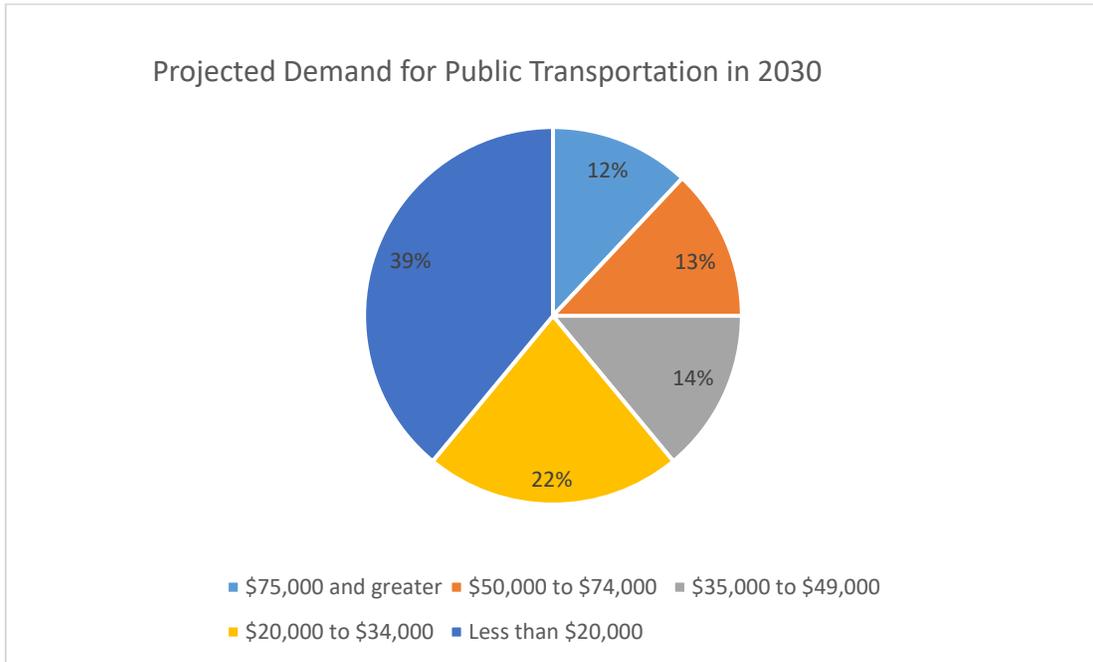


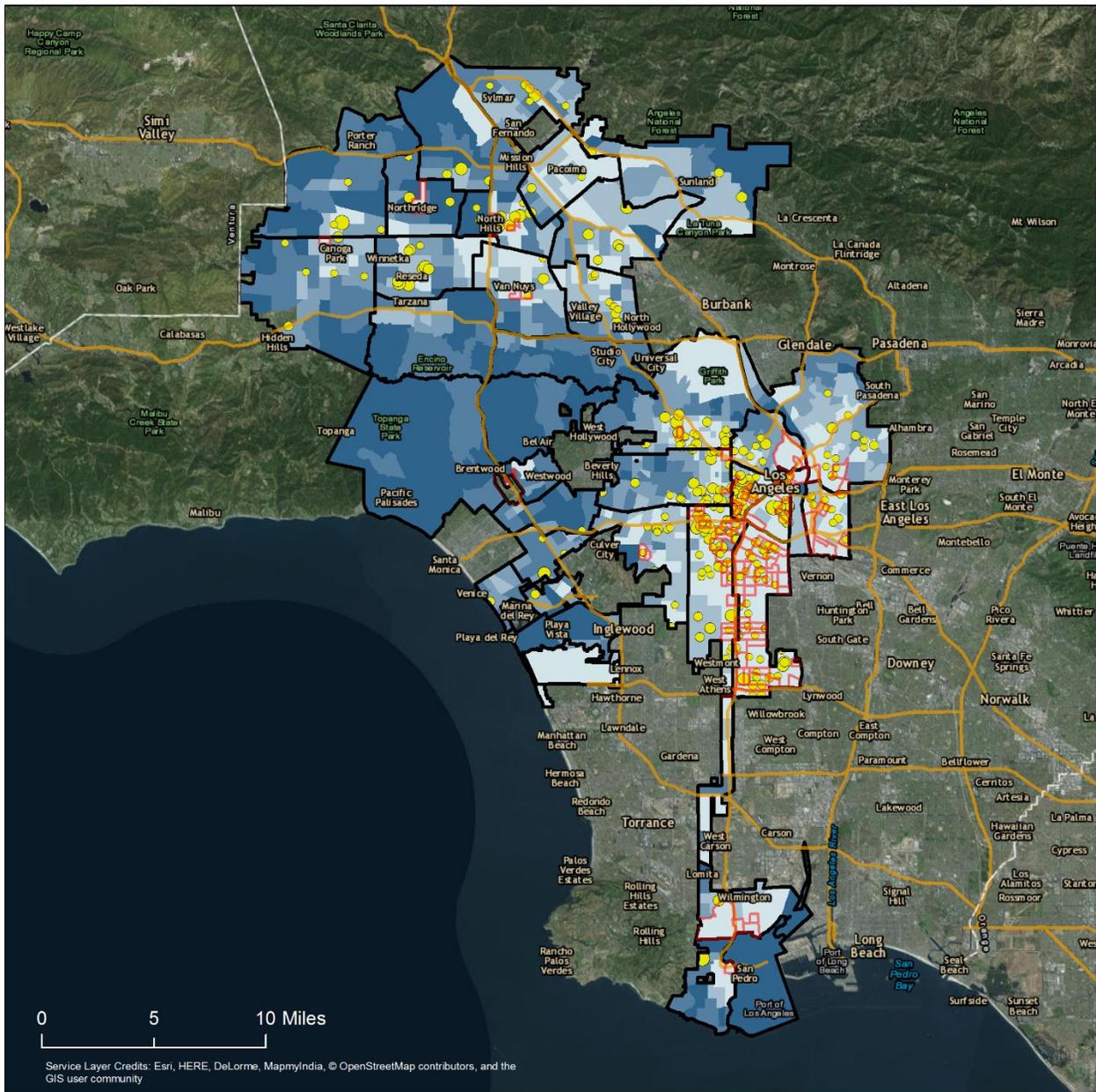
Figure 9 Projected Demand for Public Transportation Demand in 2030



Source: Center for Transit Oriented Development, 2007

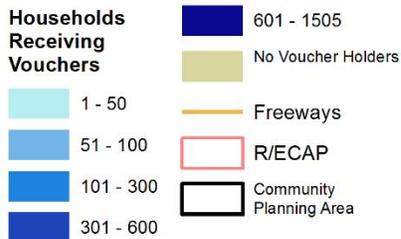
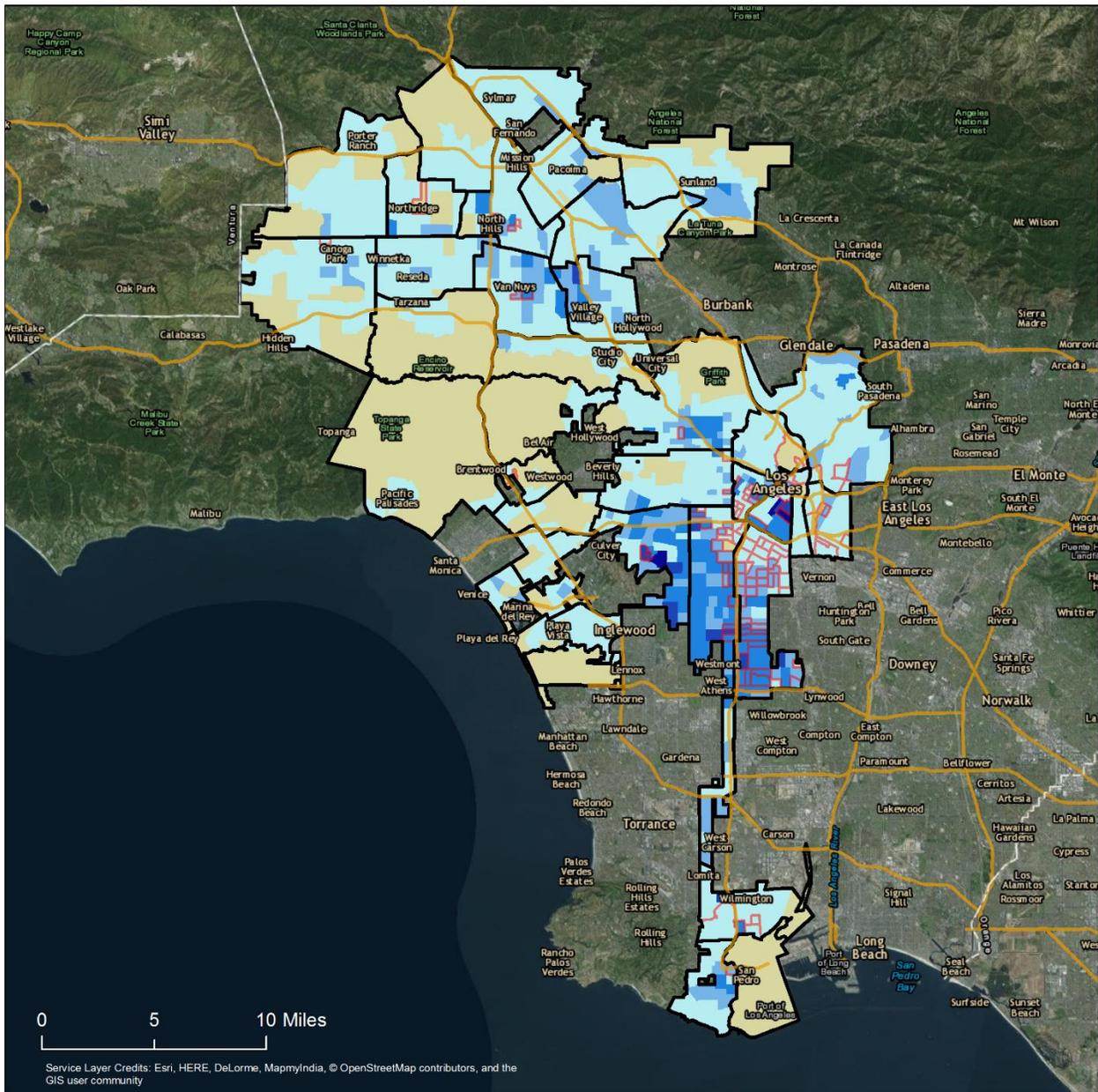
Map 10

City of Los Angeles: At Risk Affordable Housing Units with Low Poverty Index



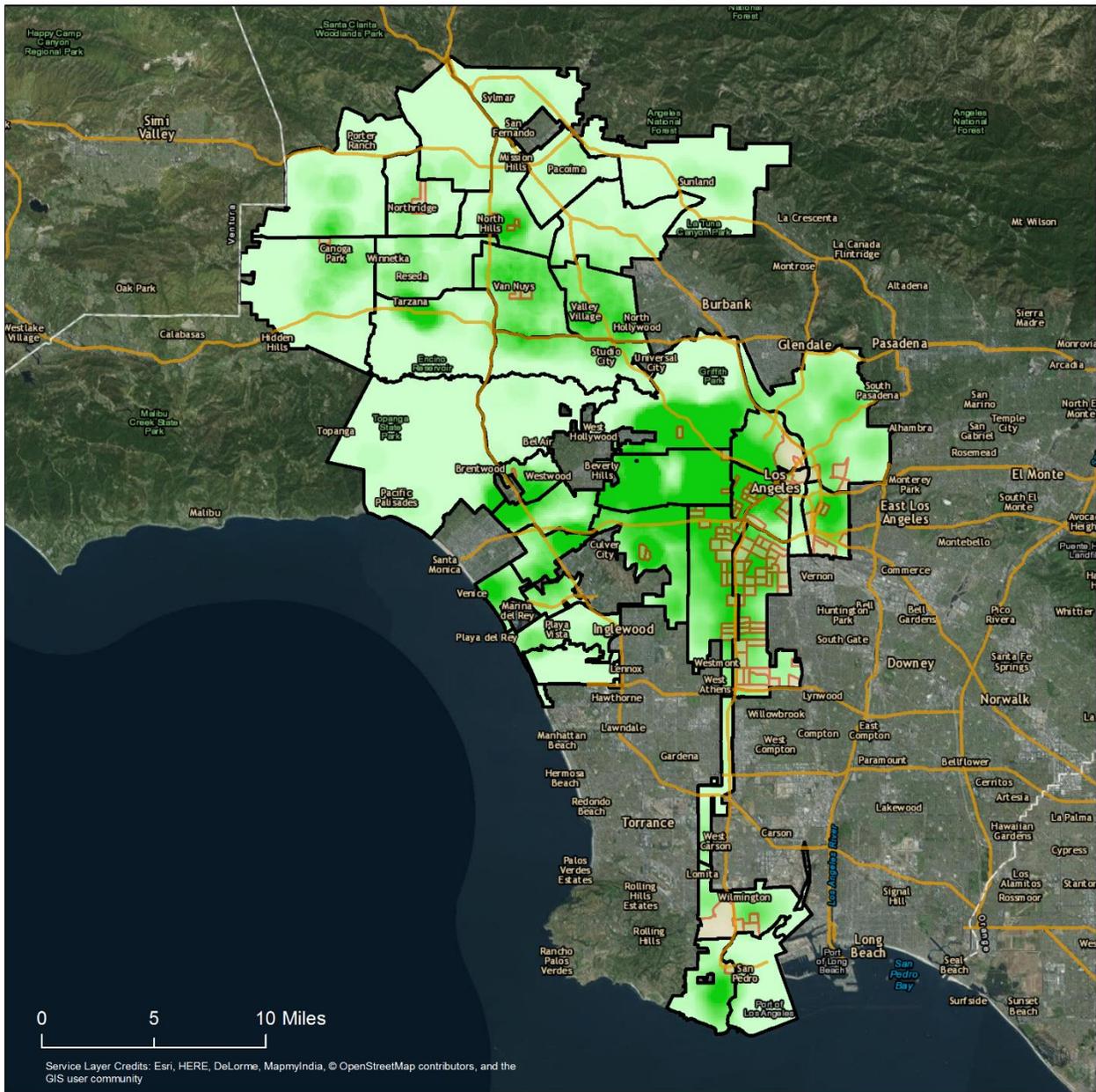
Map 11

City of Los Angeles: Number of Households Receiving Housing Choice Vouchers



Map 12

City of L.A. AFH: Rent Stabilization Ordinance Properties



RSO Unit Density

- High
- Low

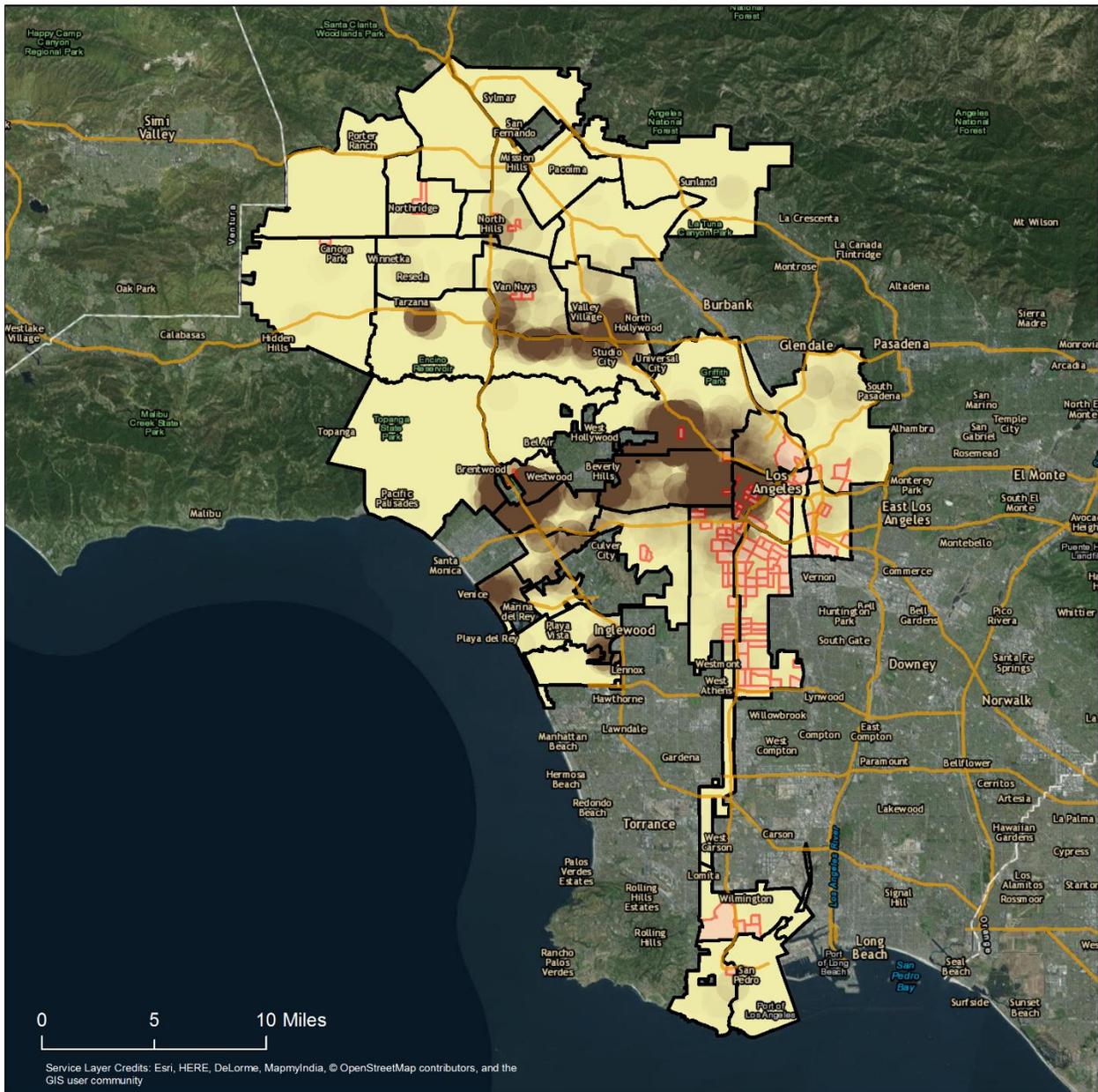
Community Planning Area

Freeways

R/ECAP

Map 13

City of L.A. AFH: Ellis Eviction Data



Ellis Eviction Unit Density

- High
- Low

Community Planning Area

Freeways

R/ECAP

To further illustrate, Table 14 provides a breakdown of neighborhood characteristics of areas near transit stations. Compared to the region and City, neighborhoods situated near transit stations boasted a higher share of individuals who do not have access to a car and use multiple modes of transportation, such as walking and biking, and are public transportation dependent.

Table 14

	Region	City of Los Angeles	Los Angeles Station Areas
Share taking transit, walking and biking to work	8%	14%	24%
Share households with 0 to 1 car(s)	46%	57%	66%
Median household income	\$45,280	\$36,687	\$29,726
Share of renter households	46%	61%	73%
Average household size	3.00	2.83	3.02

Source: U.S. Census, 2000; CTOD

Comparing median incomes within station-adjacent areas, as shown in Table 11, it is evident that the predominantly low-income area of East LA, which has the highest access to public transportation, is also home to the highest share of affordable housing units that have expiring affordability periods as previously displayed in Map 8. As discussed earlier in connection with Maps 2 – 5 and Table 6 above, there are concentrations of publicly supported housing in this part of the City and a substantial concentration of racial and ethnic minorities. Additionally, Map 12 shows that there is high concentration of Housing Choice Voucher (HCV) within this same area with high access to public transportation.

The City currently has a network of 170 bus routes and six rail lines (4 light rail and 2 subway lines), along with a regional commuter rail system. Metro’s core transit ridership is primarily made up of low-income households with most of the City’s affordable housing situated near public transportation. As many areas of the City experience rapid shifts in demographics and income, Metro has partnered with the City of LA and other regional jurisdictions to maintain and support affordable housing near transit. Through the Joint Development Program, Metro has partnered with affordable housing developers and local jurisdictions to develop transit-oriented affordable housing near Metro Stations. Metro to date has created up to 2,000 units of which 620 (31%) are affordable (Table 16). Affordability is defined as housing that is covenant-controlled with income restrictions qualifying residents with incomes at or below 60% area median income (AMI).¹¹⁴ Through the Joint Development Program, Metro has committed to making 35% of all housing units developed as part of the joint development portfolio affordable. In an effort to incentivize developers, Metro will discount the land value up to 30% on Metro-owned development sites. Additional incentives include ground lease discounts, which will be proportional to the size of the set-aside of affordable units. Along with joint developments in partnership with jurisdictions, Metro also developed a Transit Oriented Communities Loan Program (TOCLP). Through the TOCLP, Metro will invest \$9 million in the Metro Affordable Transit Connected Housing Program (Metro MATCH) and \$1 million in the Transit Oriented Communities Small Business (TOC-SB) Loan Program. The Metro Match will leverage nearly \$475 million in investments from foundations, community development finance institutions (CDFIs), and traditional banks. Up to 85% of funds in the housing program will be dedicated to preservation and expansion of existing lower-rent housing. The \$1 million in small business loans through the TOC-SB will

¹¹⁴ Metro. Affordable Housing https://www.metro.net/projects/joint_dev_pgm/affordable-housing/. Assessed on September 2017.

be used to assist commercial property owners with vacant ground-floor storefronts that are adjacent to transit. The loans will help owners lease up their vacant retail spaces to small business owners at below market rents. Metro is also partnering with the Affordable Housing Consortium and the LA County Community Development Commission (LACDC) to administer Metro MATCH and TOC-SB funds.

Through a memorandum of understanding, Metro and the City are partnering to increase coordination in promoting affordable housing near transit. This is a crucial partnership at a critical point when the City is experiencing increasingly high housing costs. It is critical that preservation and revitalization efforts target households disproportionately impacted by rising housing costs and displacement near transit, particularly those at or below 30% to 50% of AMI considering the high rates of housing cost burden and severe housing cost burden faced by Black and Hispanic renter households at those income levels. Furthermore, households at the 0-30% are also more reliant on public transportation for mobility. In reviewing the 2013-2017 Consolidated Plan and 2005-2009 CHAS data analysis, the City's extremely low-income households are overwhelmingly impacted by housing needs. Up to 53% of all households (688,995) are considered low-moderate-income with incomes ranging from 0-80% AMI. Of that share, nearly 20% (259,740) are extremely low income with incomes 0-30% AMI¹¹⁵. Within the City an overwhelming number of households are renters (61%) and only 39% are homeowners. Among the 0-30% AMI bracket, up to 110,720 households are cost burdened, paying more than 50% of their income for housing. Alternatively, examining 2010-2014 CHAS data about 568,980 renter households are considered low-moderate-income (0-80% AMI), and of which nearly 45% (255,830) of those households are within 0-30% AMI and paying over 50% of their income towards housing. Looking at Table 17, only 8% of rental units are designated for extremely low-income renters at 0-30% AMI, although this group makes up 31% of low-moderate-income renters. Nearly 43% of affordable rental units are reserved for low-moderate-income households at 51-80% AMI even though they make up 18% of low-moderate-income renters. Among the available units for rents at 0-30% AMI, 31% of those units are occupied by renters above the income restriction for those units (Table 18).

¹¹⁵ City of Los Angeles Housing and Community Development. *2013-2017 Five Year Transit Oriented Consolidated Plan and 39th Program Year (2013-2014) Action Plan, March 4, 2013*. Assessed September 2017.

Table 15

Neighborhoods	RSO Units	Ellis Eviction Units
<i>West Los Angeles</i>		
Century City	2,705	77
W. Lost Angeles	10,717	521
Westwood	9,215	457
<i>Central Los Angeles</i>		
Downtown	5,520	39
Hancock Park	3,220	32
Hollywood	22,618	444
Westlake	14,354	154
<i>South Los Angeles</i>		
Green Meadows	1,940	6
South Park	6,322	16
Vermont Knolls	3,263	11
<i>400+ Evictions</i>		
Hollywood	22,618	444
Melrose	22,267	587
Sherman Oaks	12,024	410
W. Lost Angeles	10,717	521
Westwood	9,215	457

Source: City of LA, HCIDLA

Table 16

Total Affordable Housing Metro Completed Developments	Affordable Housing Units	Market Rate Housing Units
Hollywood/Vine Hotel	0	143
Hollywood/Vine Apartments	78	297
Hollywood/Western Apartments	120	0
Westlake/McArthur Park, Phase A	90	0
Wilshire/Vermont Apartments	90	359
Wilshire/Western Apartments	0	186
Grand Central Market Apartments**	61	60
Del Mar Apartments**	21	326
One Santa Fe Apartments	88	350
Total Completed Units	548	1721
<i>Developments Underway</i>		
1st Boyle Apartments	80	0
1st Lorena Apartments	24	25
Taylor Yard Apartments Lot 1	87	0
Taylor Yard Apartments Lot 3	68	0
Taylor Yard Apartments Lot 4	0	41
Taylor Yard Condos Lot 5 (Mixed Use)	108	0
Total Developments Underway	367	41
Total Units	915	1787
Percentage	34%	66%

Source: Metro. Joint Development Program (**Indicates developments not on Metro owned land).

Table 17

Rental Households by Income		Affordable Rental Units	
All Renters	835,505	Total Occupied Units	835,505
Renters at 0-30% AMI	255,830	Affordable to 0-30% AMI	66,535
Renters at 31-50% AMI	159,480	Affordable to 31-50% AMI	93,805
Renters at 51-80% AMI	153,670	Affordable to 51-80% AMI	362,245

2010-2014 ACS 5-year average data, CHAS.

Table 18

Affordable & Available Rental Units by Household Income (Total Units and Rate Per 100 Households)				
Renter Households by Income	Total Units Affordable to Renter Households	Total Units Affordable to Renter Households but Occupied by Higher Income	Total Available & Affordable Units	Affordable & Available Units Per 100 Renter Households
0-30% AMI	67,625	20,860	46,765	18
0-50% AMI	164,145	47,925	116,220	28
0-80% AMI	536,060	130,875	405,185	71

2010-2014 ACS 5-year average data, CHAS.

Describe how the jurisdiction and region's policies, such as public transportation routes or transportation systems designed for use of personal vehicles, affect the ability of protected classes groups to access transportation.

Measure M, a half-cent sales tax increase is estimated to generate \$120 billion over 40 years to expand transit in LA. By preserving affordable housing and developing additional affordable units near transit, the City will help ensure that low-income households currently living near transit stations are not displaced. Currently, much of the existing transit system extends into low and moderate-income neighborhoods, including East LA. In June 2017, the Metro Policy and Advisory Council and the Metro Board of Directors adopted the Measure M Master Guidelines. Although the Guidelines prioritize Metro's Complete Streets policy and include a multimodal approach, there is still uncertainty surrounding how Metro's Complete Streets policy will be applied across Measure M programs and how projects will be eligible for assistance under the Measure. The Complete Streets policy ensures that Metro's programs offer a balanced approach to the transportation system that functions for all users, particularly those who are part of vulnerable populations such as those protected under the federal, state, and local fair housing laws. Projects funded under Measure M should give precedence to core users of public transit and pedestrians. These projects might prioritize efficiencies in service, increased access, and road safety. In LA County, up to 500 people are killed annually due to traffic related collisions. The City has made strides to reduce traffic-related deaths through the Vision Zero strategy, and the County is currently developing a similar strategy. In the City of LA, 11,117 people were killed from 2012 through 2017 due to traffic-related collisions. South LA, and specifically neighborhoods with R/ECAPs in South Park, Boyle Heights, and Florence saw up to 60 traffic related fatalities.¹¹⁶ Neighborhoods including Watts, Green Meadows, and Broadway Manchester had up to 40 traffic deaths. Manchester Square and Vermont Knolls had 53 traffic related deaths in the same period. Future Measure M programs should support existing initiatives such as Vision Zero that prioritize pedestrians over vehicles. Through Measure M, public transportation can ensure that safety and access are primary objectives, particularly for vulnerable users such as individuals with disabilities and disproportionately Black and Hispanic low-income public transit dependent users who make up the current core ridership.

Along with prioritizing safety, core users, and reliable service, it is critical that Metro ensures that housing is at the center of the planning process for expansion projects. Access to affordable housing near transit provides critical connections for many low-income households in areas with high concentrations of racial

¹¹⁶ City of Los Angeles, Vision Zero Map, <http://visionzero.lacity.org/map/>. Assessed on August 2017.

and ethnic minorities, foreign born populations, and individuals with disabilities. Residents in these neighborhoods take advantage of the availability of transit, and they are less likely than those elsewhere to own cars and more likely to use transit to commute to work.¹¹⁷ As illustrated in Table 11, in 2000, the median income of residents near transit stations was lower than the regional median income. Furthermore, the same households are also more likely to be renters, which makes them particularly vulnerable to displacement. Unlike homeowners, renters are reliant on property owners, who can raise rents to charge higher market rates and convert units to short-term rentals. This danger can be especially acute to low-income renters who are Housing Choice Voucher holders. As prices rise in the market, landlords who participate in the Section 8 program have few incentives to reserve their property as affordable. Additionally, changes in ownership and renovations can also increase once affordable rents. As demand for public transportation grows, evidenced by recent ballot measures increasing Metro investment, and in conjunction with transit expansions, these once low-income neighborhoods are more attractive to higher income earners looking to live closer to transit options. Through its Mobility Plan 2035, the City of LA is also adopting measures to reduce residents' dependency on automobiles over the next two decades.¹¹⁸ The City anticipates that Mobility Plan projects will increase transit use by 56%. Major corridors including Van Nuys Boulevard, Sherman Way, and Martin Luther King Jr. Boulevard will be redesigned to de-emphasize automobiles and include bus-only lanes, bicycle lanes, and traffic calming measures intended to increase mobility options and make roads safer for multiple users. In addition to inclusive and transparent planning processes for new developments under Measure M, changes to routes and schedules should be centered around users, specifically the core riders of the system.

The recently expanded Expo Line from Culver City to Santa Monica offers faster travel times in sections of the line that are grade separated. However, the first phase of the Expo line from Downtown LA to Culver City is not grade separated, and trains must go through many intersections without any signal preemption, which would give priority to trains while cars waited at the signal. By prioritizing cars, the eastern portion of the Expo Line is much slower and can easily add to travel time. Although the LADOT worked with Metro to synchronize signals in order to ensure that trains hit green lights, there are other factors that can cause delays making it unrealistic for a train to always hit the green lights. The Expo Line also connects with the Blue Line, and, at certain intersections, trains come every three minutes making preemption of signals not possible unless service on other lines are disrupted. A 2016 study completed by Southern California Public Radio, KPCC, found that trains for the most part stick to the schedule and just 1% of trains were late, meaning that out of 2,872,493 recorded stops by Metro since 2010 only 30,735 had late stops.¹¹⁹ The study also showed that the Red and Purple Lines fared better than other rail lines. Being the only two lines underground, the Red and Purple Lines were more consistently on time. Timeliness is affected by the rail lines' interaction with City streets and traffic, intersections, and pedestrians. The oldest line in the system, the Blue Line, has the worst performance, being late 3.4% of the time. The Blue Line has several street crossings that result in late departures. However, the Blue Line still outperformed all bus lines. Last year, 22.7% of buses ran late. Older lines like the Blue, Red, and Green, which opened in the 1990s, frequently encounter unexpected problems due to the age of the systems. The Measure M

¹¹⁷ Creating Successful Transit-Oriented Districts in Los Angeles: A Citywide Toolkit for Achieving Regional Goals, 2010: <file:///C:/Users/aravindranath/Documents/AFFH/AFHs/LA%20Joint/Maps/Transportation/CTOD%20-%20Creating%20Successful%20Transit-Oriented%20Districts%20in%20Los%20Angeles.pdf>

¹¹⁸ City of Los Angeles, Mobility Plan 2035, <http://plan.lamayor.org/portfolio/mobility-transport/>. Assessed on August 2017.

¹¹⁹ Metro buses and trains have trouble sticking to schedule, data shows, May 2016 <http://www.scpr.org/news/2016/05/12/60250/data-metro-s-buses-and-trains-having-trouble-stick/>.

Expenditure Plan and Ordinance will direct the projects funded, and the Measure M Guidelines will determine how projects will be implemented.¹²⁰ It is critical that Metro ensure that Measure M projects are consistent with regional goals and fulfill existing policies. The implementation process must include planning during the project development phase, specifically to assess community needs and garner input from residents. Metro will rely on the Mobility Matrices to determine eligibility and project readiness. In addition to project readiness, considerations should also be provided to projects that may not meet project readiness threshold but offer quality of life benefits to residents and Metro's core riders. Along with the identified corridors, consideration should be given to corridors that have higher ridership, which the Mobility Matrix does not identify. Low-income Hispanics make up the core of bus riders and through Measure M, priority should be given to high-quality bus services through BRT to serve low-income residents who are disproportionately racial and ethnic minorities. Currently Measure M will also allocate funding for services for people with disabilities through ADA paratransit services along with discounted fares for students and seniors. These programs are underutilized and should be promoted to the populations they are intended to serve. The subsidy program through Measure M will be beneficial to TAP card integration by offering more flexible benefits and a simplified process to determine eligibility. Processes should be established for stakeholders and advocacy groups representing the impacted communities of the subsidy programs to ensure that services meet their needs.

d. Access to Low Poverty Neighborhoods

For the protected class groups, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

Access to low poverty neighborhoods is an integral aspect of opportunity. Studies have demonstrated the link between living in (or moving to) low-poverty neighborhoods and higher college attendance and higher earnings as an adult.¹²¹ Likewise, living in areas with high concentrations of poverty can contribute to the “perpetuation of poverty and the production of neighborhoods with high levels of crime and violence and low levels of high-school completion and labor force attachment.”¹²²

Visualized through the HUD data, the Low Poverty Index (the Index) shown in Map 1 measures the poverty rate in each neighborhood.¹²³ A higher value on the Index is associated with a higher probability that a household is likely to live in a low poverty neighborhood. As demonstrated in Map 1, the core area of the City that encompasses Central, South, and East LA score low on the Index, indicating the presence of high poverty neighborhoods. Often, these same areas within the City, including, West Adams, Mid-City, Westlake, Pico Union, Boyle Heights, Lincoln Heights, South Central, Vernon, and Watts, have a higher proportion of Hispanic and Black residents compared to other parts of the City. This same area also has a

¹²⁰ Investing in Places. Policy Analysis: Measure M Guidelines, April, 2017, <https://investinginplace.files.wordpress.com/2017/04/measuremguidelines-april2017policyanalysis.pdf>. Accessed August 2017.

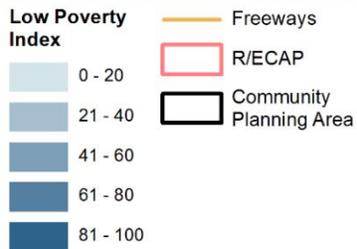
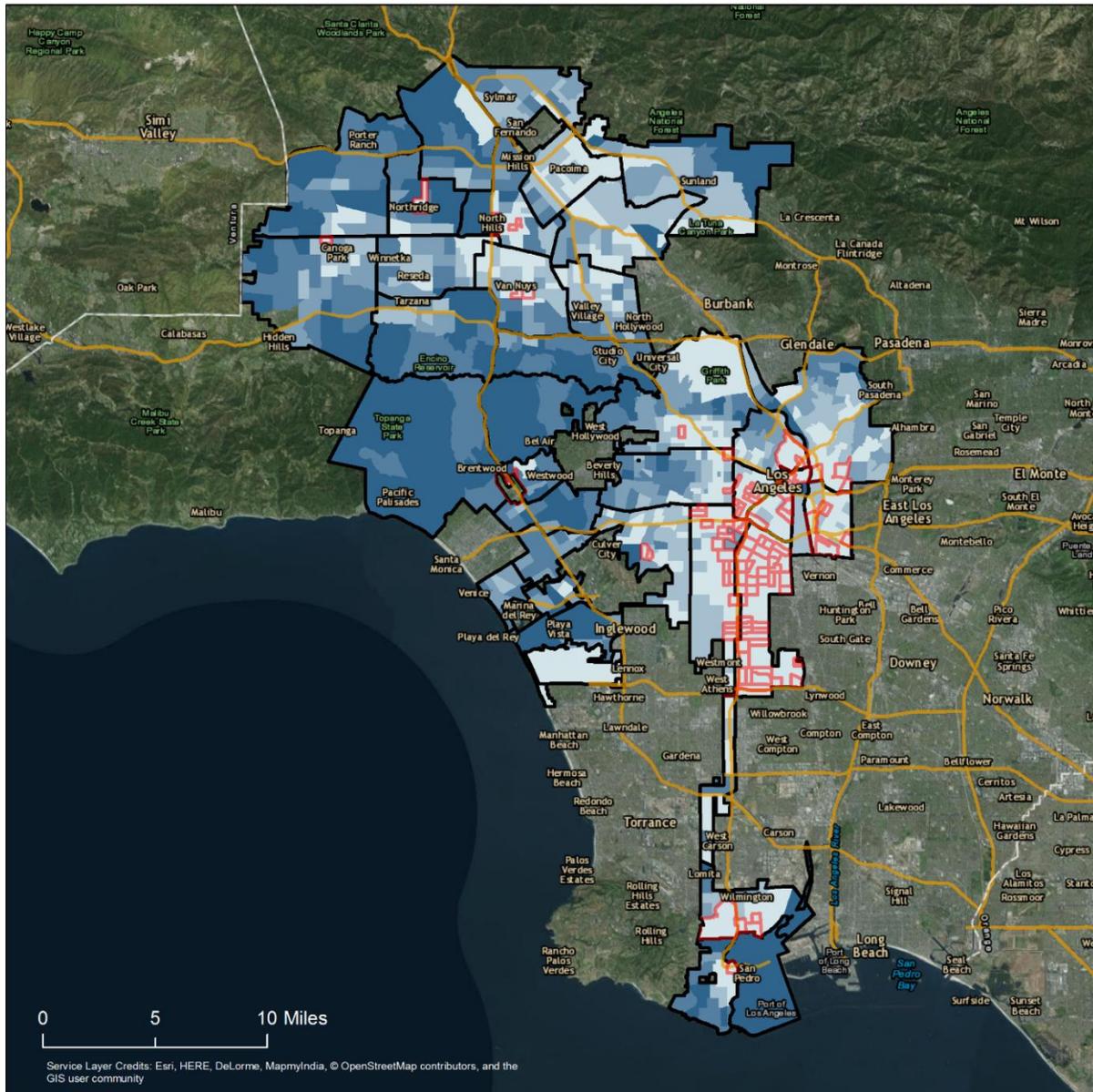
¹²¹ The Effects of Neighborhoods on Intergenerational Mobility I: Childhood Exposure Effects (with Nathaniel Hendren), National Bureau of Economic Research Working Paper No. 23001, Revised Version (May 2017)

¹²² Jargowsky, Paul. “Concentration of Poverty in the New Millennium: Changes in Prevalence, Composition, and Location of High Poverty Neighborhoods.” (2013). The Century Foundation and Rutgers Center for Urban Research. Referencing William Julius Wilson’s findings from “The Truly Disadvantaged” (1987).

¹²³ Specifically, the uses both family poverty rates and public assistance receipt, in the form of cash-welfare, such as Temporary Assistance for Needy Families (TANF). <https://data.world/hud/low-poverty-index>

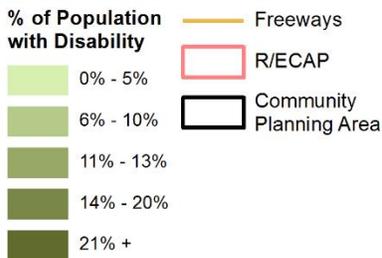
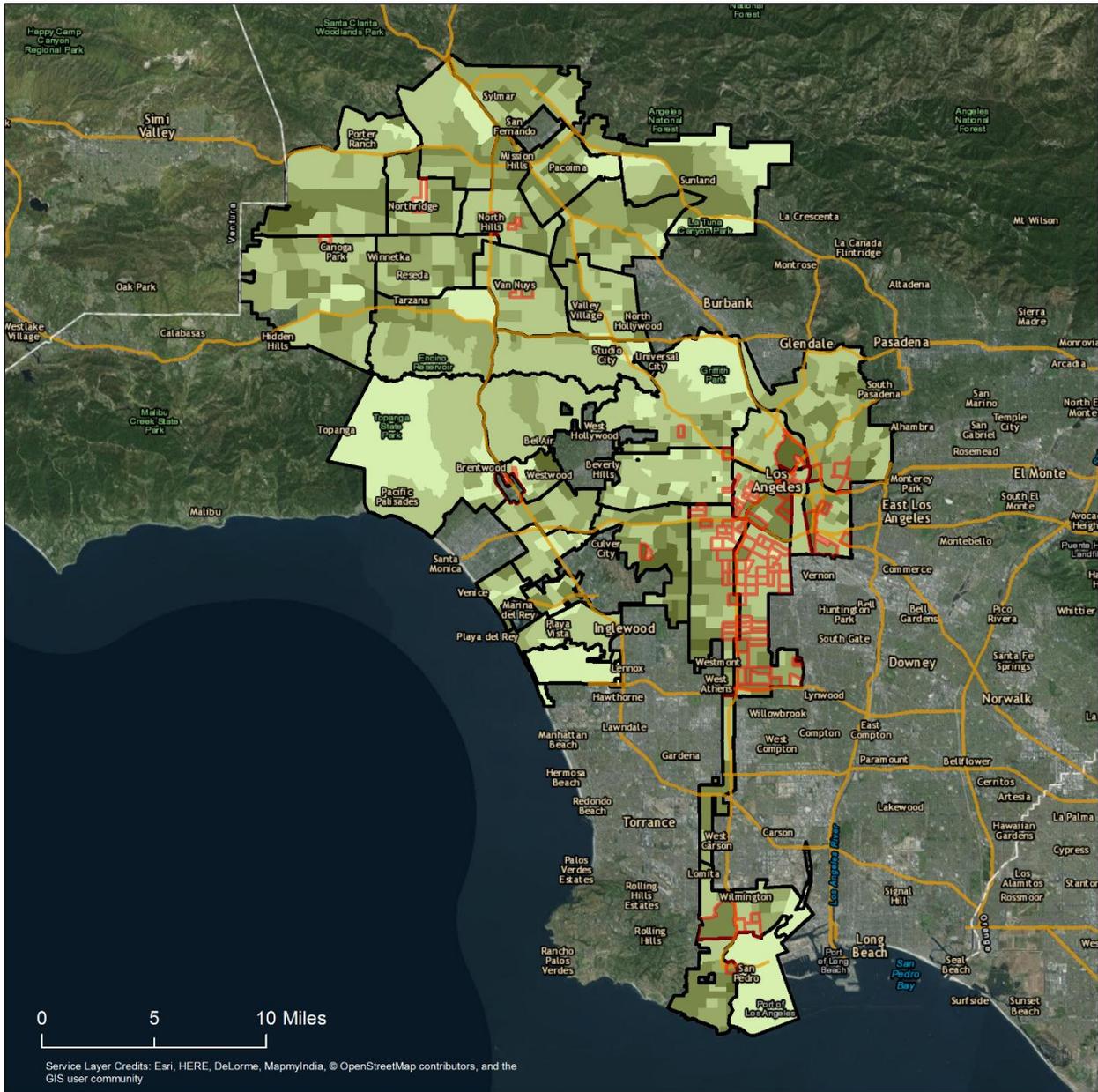
higher share of individuals with physical, auditory and cognitive disability (Map 2). Map 1 also shows that most of the City's R/ECAPs are in areas within Central, South, and East LA. Predictably, R/ECAPs perform poorly on the Low Poverty Index.

Map 1
City of Los Angeles: Low Poverty Index



Map 2

City of Los Angeles: Share of All People with a Disability



*What role does a person’s place of residence play in their exposure to poverty?
Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?*

In LA, location of residence plays a substantial role in a household’s exposure to poverty. The Low Poverty Index is based on household rates of poverty, implying that residence is a key variable in one’s exposure to poverty. Table 3 demonstrates that Hispanics and Blacks are most affected. Hispanics score the lowest on the Low Poverty Index (25.84), with Blacks scoring slightly higher (27.68), Native Americans (37.48) and Asian or Pacific Islanders (43.16) scoring moderately higher, and Whites scoring the highest (57.93). Table 3 also indicates that lower scores on the Low Poverty Index generally correlate to lower scores on the School Proficiency Index, Labor Market Index, and Environmental Health Index.

Table 3: City of Los Angeles: Opportunity Indicators, by Race/Ethnicity

(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	57.93	66.39	68.23	81.08	82.87	47.60	17.72
Black, Non-Hispanic	27.68	35.38	32.64	85.39	88.08	46.67	9.12
Hispanic	25.84	41.88	32.80	84.89	87.23	43.10	12.09
Asian or Pacific Islander, Non-Hispanic	43.16	55.02	54.13	84.83	87.77	46.88	12.88
Native American, Non-Hispanic	37.48	50.46	45.47	83.58	86.17	46.39	14.83
Population below federal poverty line							
White, Non-Hispanic	46.73	61.43	60.25	85.00	87.84	47.10	13.62
Black, Non-Hispanic	18.53	30.29	24.51	87.01	89.53	45.30	8.21
Hispanic	17.65	37.54	28.17	86.70	89.79	44.56	9.49
Asian or Pacific Islander, Non-Hispanic	34.48	53.09	49.34	88.18	92.15	49.66	8.49
Native American, Non-Hispanic	20.52	40.60	33.38	87.46	91.04	48.99	8.23
(Los Angeles-Long Beach-Anaheim, CA) Region							
Total Population							
White, Non-Hispanic	65.34	68.73	67.34	76.59	79.87	46.74	38.36
Black, Non-Hispanic	36.77	37.95	36.13	81.34	83.42	46.12	23.65
Hispanic	36.01	43.05	35.43	80.65	83.98	43.16	25.56
Asian or Pacific Islander, Non-Hispanic	55.68	64.53	57.42	78.82	82.35	45.30	31.29
Native American, Non-Hispanic	48.97	52.60	48.40	78.04	81.53	44.84	33.60
Population below federal poverty line							
White, Non-Hispanic	53.04	61.26	59.07	80.43	84.23	48.46	32.62
Black, Non-Hispanic	23.71	30.73	26.45	83.34	85.48	44.58	21.67
Hispanic	24.25	37.27	28.83	83.28	86.96	43.89	21.76
Asian or Pacific Islander, Non-Hispanic	45.15	58.20	50.53	82.27	86.69	47.52	27.36
Native American, Non-Hispanic	32.13	38.92	34.86	80.82	84.18	47.51	25.97

Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA
Refer to the Data Documentation for details (www.hudexchange.info).

Informed by community participation, consultation with other relevant government agencies, and the participant’s own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

There are several factors that affect disparities in access to low poverty neighborhoods, including: insufficient housing production, land use and zoning policies and practices, barriers to producing affordable housing in low poverty neighborhoods, and source of income discrimination. Over the last decade, LA has faced a serious affordable housing crisis that was, in part, caused by decades of insufficient housing production, particularly in predominantly White, low poverty neighborhoods. Although increased housing production is a key part of Mayor Garcetti’s plan for addressing the crisis, some observers believe that the 100,000 planned units will not be enough to meet demand and slow rent increases. Moreover, most of the City’s new permitting has been concentrated in only a few areas downtown, rather than White, low poverty neighborhoods though areas along the Red Line extension to North Hollywood are an exception to this trend. Many existing programs geared to provide low and moderate-income households with affordable

housing options are also concentrated in high poverty neighborhoods, likely due to insufficient affordable housing in low poverty neighborhoods. Examining, Map 4 and looking at the density of homeownership programs for low and moderate-income households, including the City's Low-Income Purchase Assistance (LIPA) and the Mortgage Credit Certificate (MCC), which exhibits concentration throughout South LA and in areas with R/ECAPs. Furthermore, looking at Map 5, South LA and other areas of the City with high rates of poverty, including R/ECAPs in the Valley, show higher concentration of renters who are voucher holders. As demonstrated in Table 6, Black residents make up nearly 54% voucher recipients and are heavily concentrated in South LA. Although the western portion of South LA displays higher Low Poverty Index scores compared to the eastern part of South LA, overall this portion of the City includes much of the affordable housing options for homeowners and renters, and incorporates higher rates of poverty.

Additionally, Los Angeles is in the midst of a homelessness crisis. According to the 2017 Greater Los Angeles Homelessness Count, there are nearly 57,794 individuals experiencing homelessness in Los Angeles County on any given night, of which 34,189 are located with the City of Los Angeles. The City's homeless population increased 23% between 2016 and 2017. The number of chronically homeless in the City of Los Angeles rose 19% to 10,753. HUD defines chronically homeless persons as individuals with disabilities who have been homeless for at least one year, over a sustained period of time, or across at least four periods in three years. The number of City homeless youth aged 24 years or younger rose 50% to 2,796 during that same period. Of the total homeless population in the City, 25,237, or 74% of homeless individuals are unsheltered, living in street encampments, living out of their cars, under bridges, or in abandoned buildings.

The Los Angeles Homeless Services Authority (LAHSA) utilizes rapid rehousing programs by providing rental assistance and security deposits to target individuals who are recently homeless or on the verge of becoming homeless. Reviewing Map 7, rapid rehousing placements are heavily concentrated in South and East LA in high poverty neighborhoods, such as Vermont Knolls, Vermont Vista, and Green Meadows. Furthermore, Map 8 displays the destinations of households upon exiting emergency shelters, they are concentrated in South LA and East LA in neighborhoods with high poverty and R/ECAPs. Transitional housing (Map 9) participant exits are distributed slightly more in the City with increased placements in the Valley, in areas such as Van Nuys. With the City's homeless population overwhelmingly Black and Hispanic, the high placements in South and East LA continue to perpetuate existing segregation patterns by race and income. Figure 10 and 11 provide neighborhood profiles for the two community planning areas (CPAs) that have the most placements, which include the South and Southeast CPAs, across programs, rapid re-housing, emergency shelter, and transitional housing. The South CPA is 96% non-White, with Hispanics and Blacks making up 92% of residents (Figure 10). The Southeast CPA is 99% non-White, and Hispanic and Black residents make up 98% of the total population (Figure 11). Additionally, a significant number of units currently part of the City's occupancy monitoring inventory is also concentrated in the South and Southeast CPAs (Map 12). Using a methodology developed by the Nelson A. Rockefeller Institute of Government, the Hardship Index compares the 2010 economic conditions of one CPA to another. The Index uses U.S. Census demographic and socio-economic data, including unemployment, age dependency, education, income level, crowded housing, and poverty, and averages them together to provide a measurement for level of hardship in a given CPA¹²⁴. Scores on the index range from 0 to 100 with higher values indicating greater hardship. Both the South and Southeast CPA garner high values (South 72 and

¹²⁴ Los Angeles Department of City Planning and Los Angeles County Department of Public Health, Plan for a Health Los Angeles, Health Element Data Guide, <http://healthyplan.la/interactive/neighborhoods/HealthyLADataGuide.pdf>. Assessed October 2017.

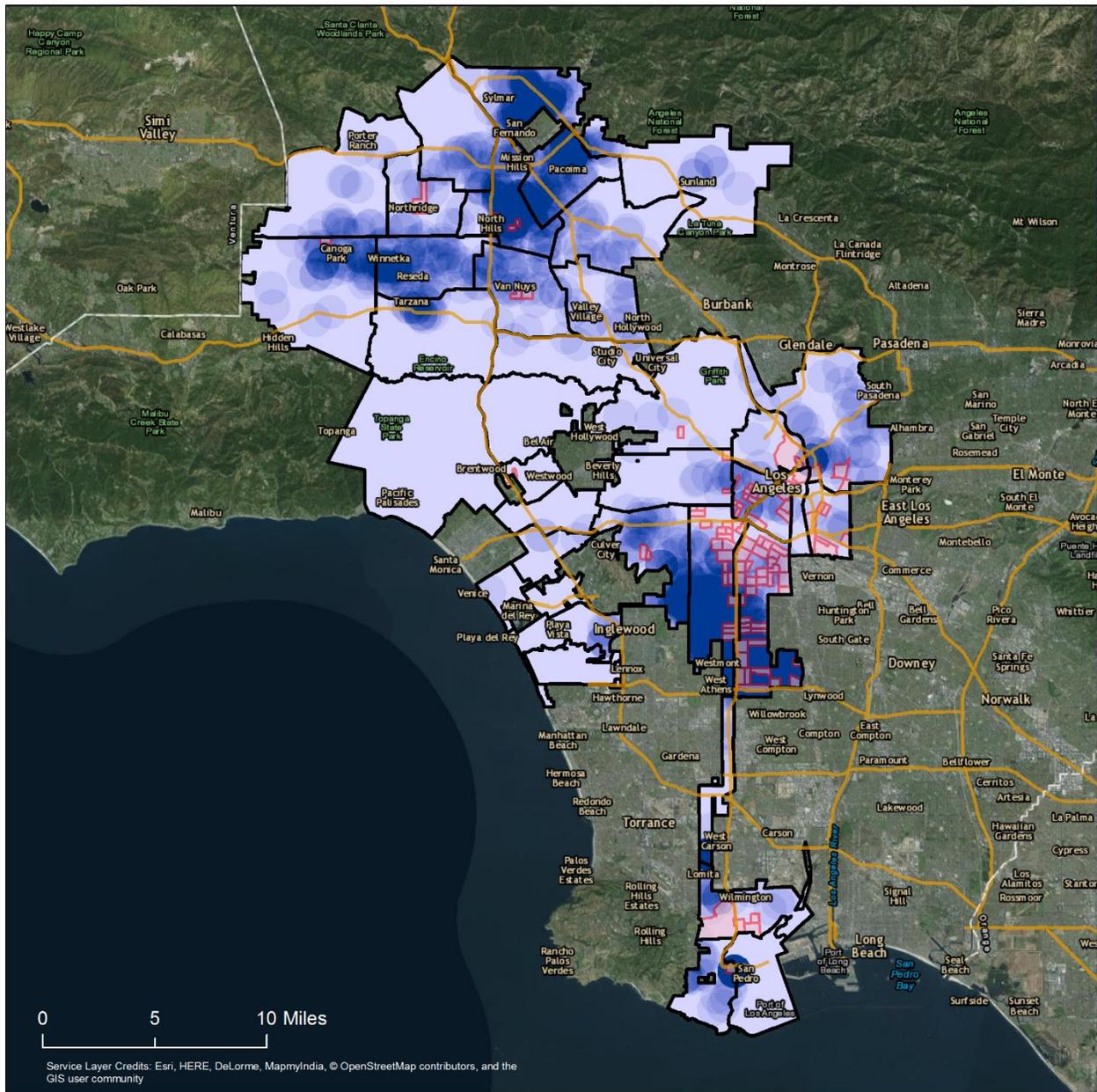
Southeast 88) on the Hardship Index. Living in racially and economically segregated neighborhoods can be a significant barrier to economic mobility, which is critical to prevent individuals and families from becoming chronically homeless. As the City and County make strides in decreasing the number of homeless families, however, the neighborhoods where a child grows up substantially impacts the child's own future for upward mobility. A 2015 study from Harvard researchers Raj Chetty and Nathaniel Hendren, found that children who grow up in neighborhoods with lower levels of segregation by race and class, lower levels of income inequality, proficient schools, and lower rates of violent crime have much better opportunity to escape poverty than children who grow up in highly segregated neighborhoods that have high poverty and lack of access to other opportunities, such as education, health, and employment¹²⁵.

Through the City's Comprehensive Homeless Strategy Plan the City is taking a two-pronged approach, identifying immediate needs and long-term strategies to build sufficient inventory to fill the gap in affordable housing that has contributed to high rates of homelessness. The City is prioritizing needs to address the most pressing issues, including storage facilities, mobile showers, and safe parking locations for individuals living in their cars. Initial efforts, particularly the development of storage facilities, have been met with considerable community opposition. Additionally, using 10 city-owned parcels, approximately 500 housing units will be constructed for the City's chronically homeless in Lincoln Heights, the San Fernando Valley, the Westside and South LA. The City has taken a number of actions to identify increased funding, including Measure H and Proposition HHH. Measure H will generate \$355 million through sales tax to be applied towards LAHSA's services and programs. Services and programs will focus on rapid re-housing, permanent supportive housing, enhancing the emergency shelter system, and homelessness prevention. Proposition HHH revenue will generate up to \$1.2 billion in bond proceeds to develop nearly 10,000 units of permanent supportive housing. Additionally, the City along with the Housing Authority and LA County are coordinating efforts to secure funding for services and project-based rental subsidies for housing funded with bond proceeds.

¹²⁵ Quarterly Journal of Economics, *The Geography of Intergenerational Mobility in the United States*, 2014, <http://www.nber.org/papers/w19844.pdf>. Assessed October 2017.

Map 4

City of L.A. AFH: Soft Second Loans and Mortgage Credit Certificate Data



Map 5

City of Los Angeles: Number of Households Receiving Housing Choice Vouchers

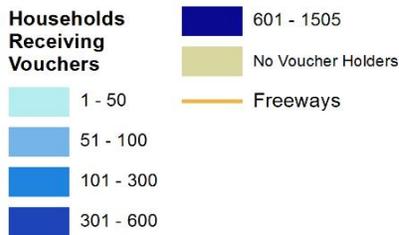
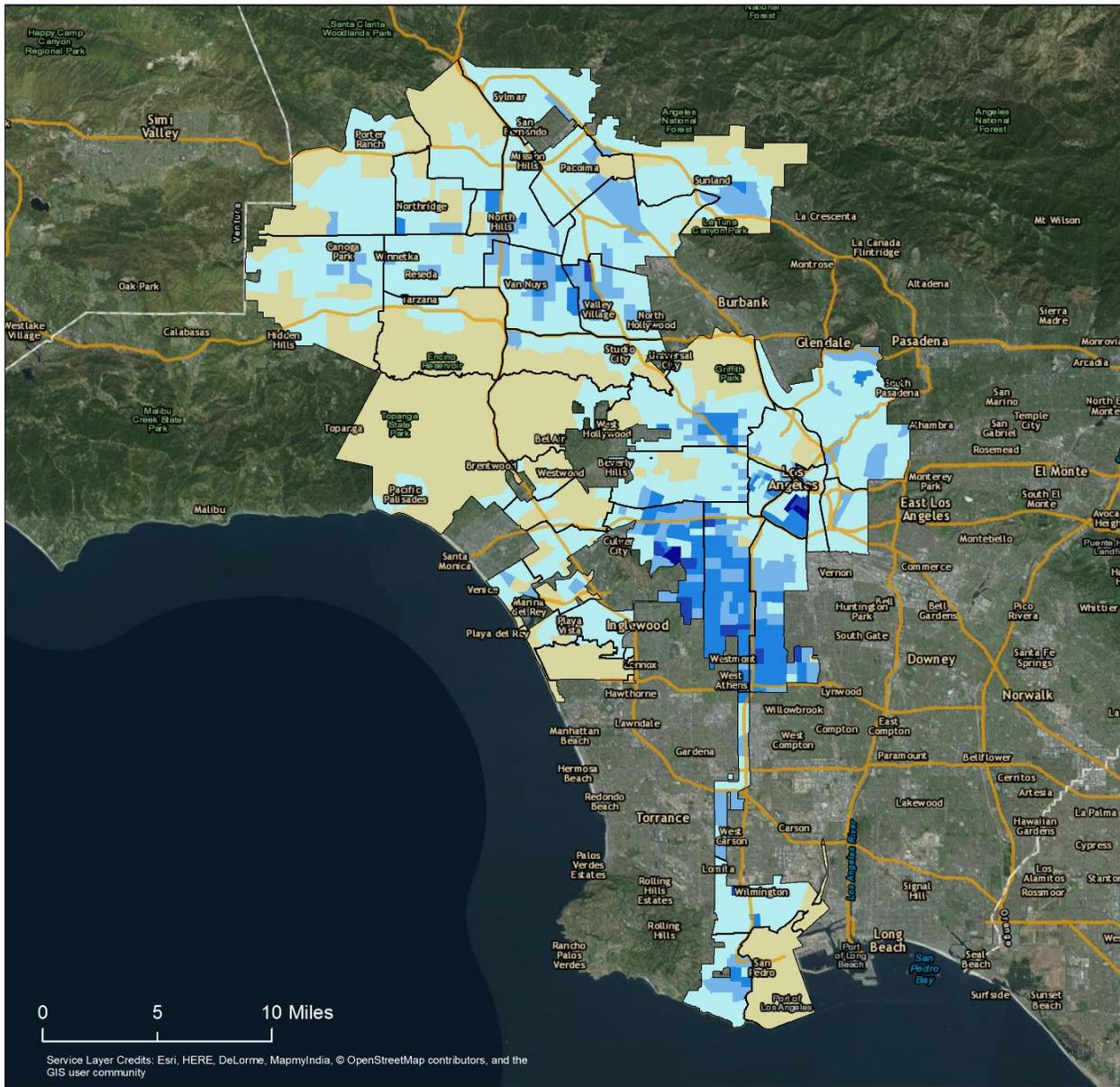
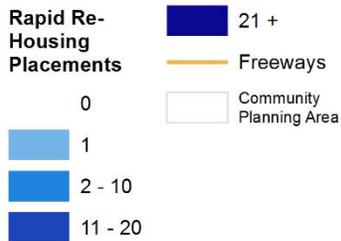
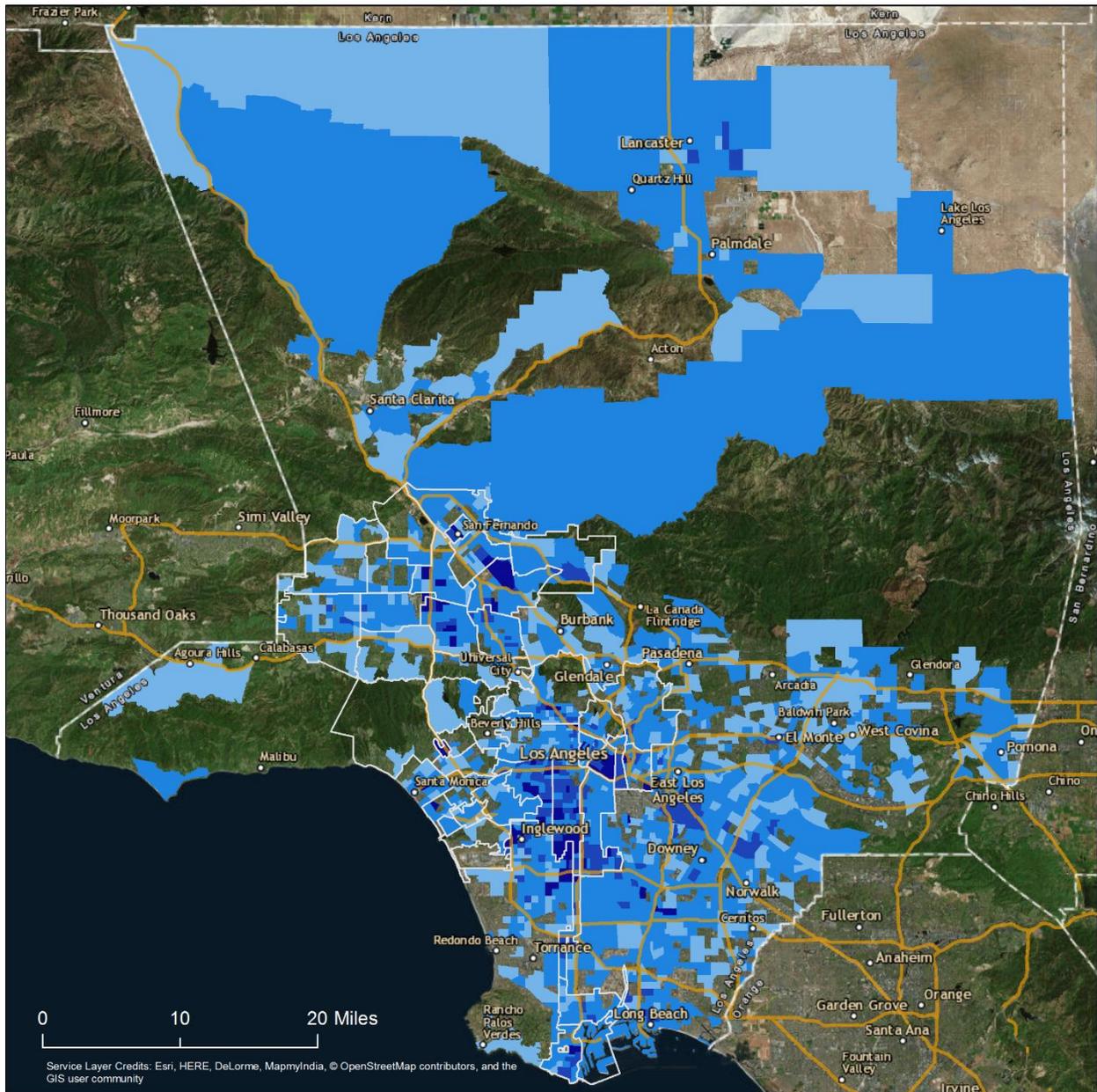


Table 6

(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	223	3.17%	1,685	23.98%	4,918	69.99%	201	2.86%
Project-Based Section 8	4,382	21.58%	3,863	19.02%	5,617	27.66%	6,409	31.56%
Other Multifamily	851	30.13%	280	9.92%	672	23.80%	1,013	35.87%
HCV Program	9,449	22.10%	23,039	53.89%	9,005	21.06%	1,178	2.76%
Total Households	510,140	38.62%	146,570	11.10%	471,240	35.67%	162,019	12.27%
0-30% of AMI	73,675	25.53%	47,200	16.35%	126,635	43.88%	34,589	11.98%
0-50% of AMI	112,300	22.83%	70,530	14.34%	232,130	47.19%	54,289	11.04%
0-80% of AMI	181,610	25.11%	96,015	13.27%	338,220	46.76%	79,799	11.03%
(Los Angeles-Long Beach-Anaheim, CA) Region								
Housing Type								
Public Housing	683	6.99%	2,627	26.90%	6,110	62.56%	344	3.52%
Project-Based Section 8	9,154	23.86%	6,942	18.10%	10,365	27.02%	11,753	30.64%
Other Multifamily	1,707	33.38%	465	9.09%	1,094	21.39%	1,839	35.96%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	1,766,510	41.80%	333,080	7.88%	1,405,070	33.25%	629,349	14.89%
0-30% of AMI	215,775	29.59%	86,225	11.83%	305,885	41.95%	105,314	14.44%
0-50% of AMI	343,565	26.07%	135,740	10.30%	587,685	44.60%	175,814	13.34%
0-80% of AMI	590,895	28.77%	195,155	9.50%	905,370	44.09%	272,549	13.27%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: #s presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).								

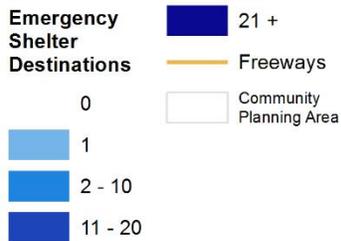
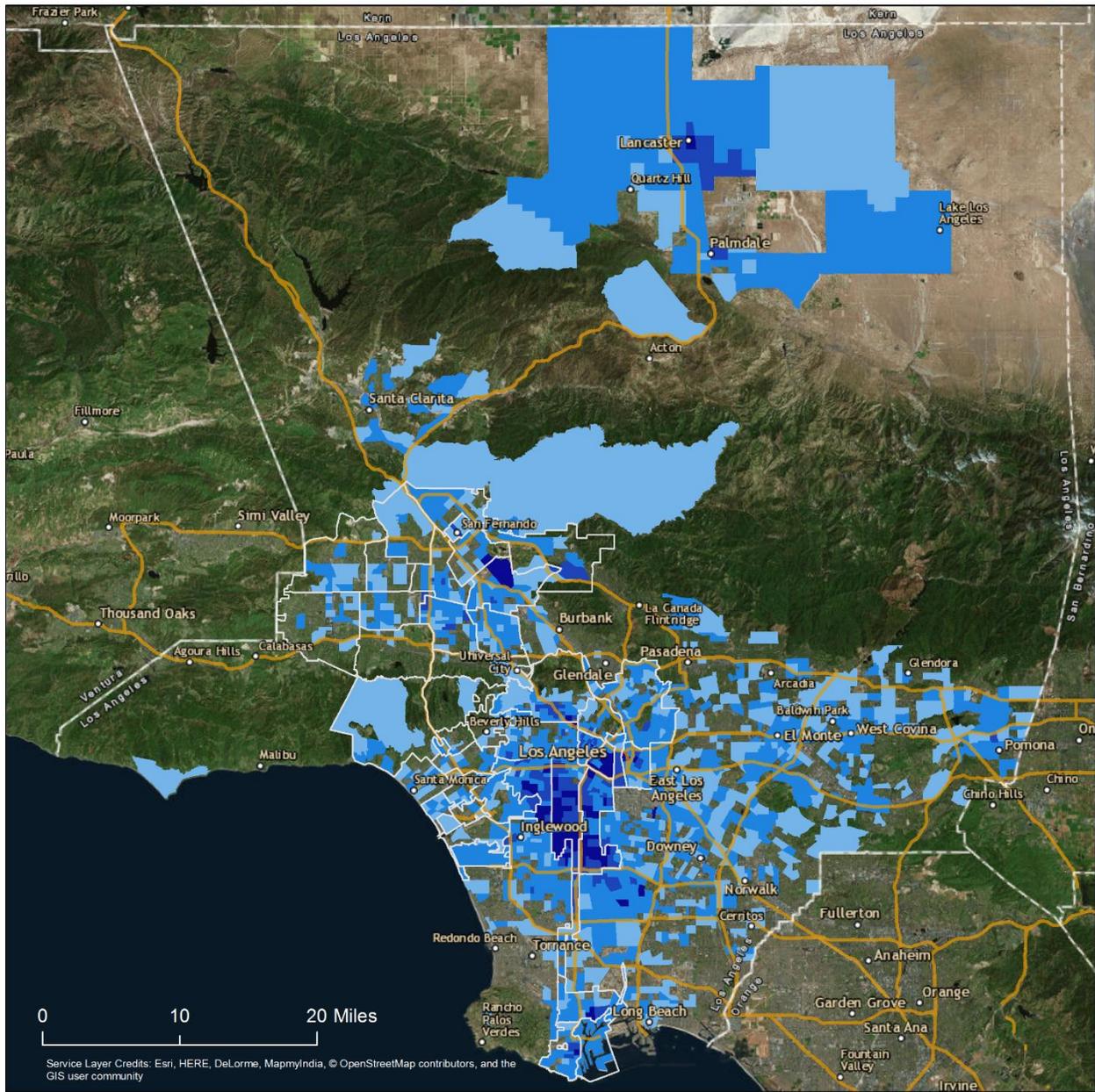
Map 7

Los Angeles County: Rapid Re-Housing Placements by Census Tract



Map 8

Los Angeles County: Emergency Shelter Destinations by Census Tract



Map 9

Los Angeles County: Transitional Housing Destinations by Census Tract

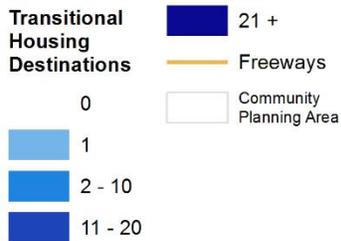
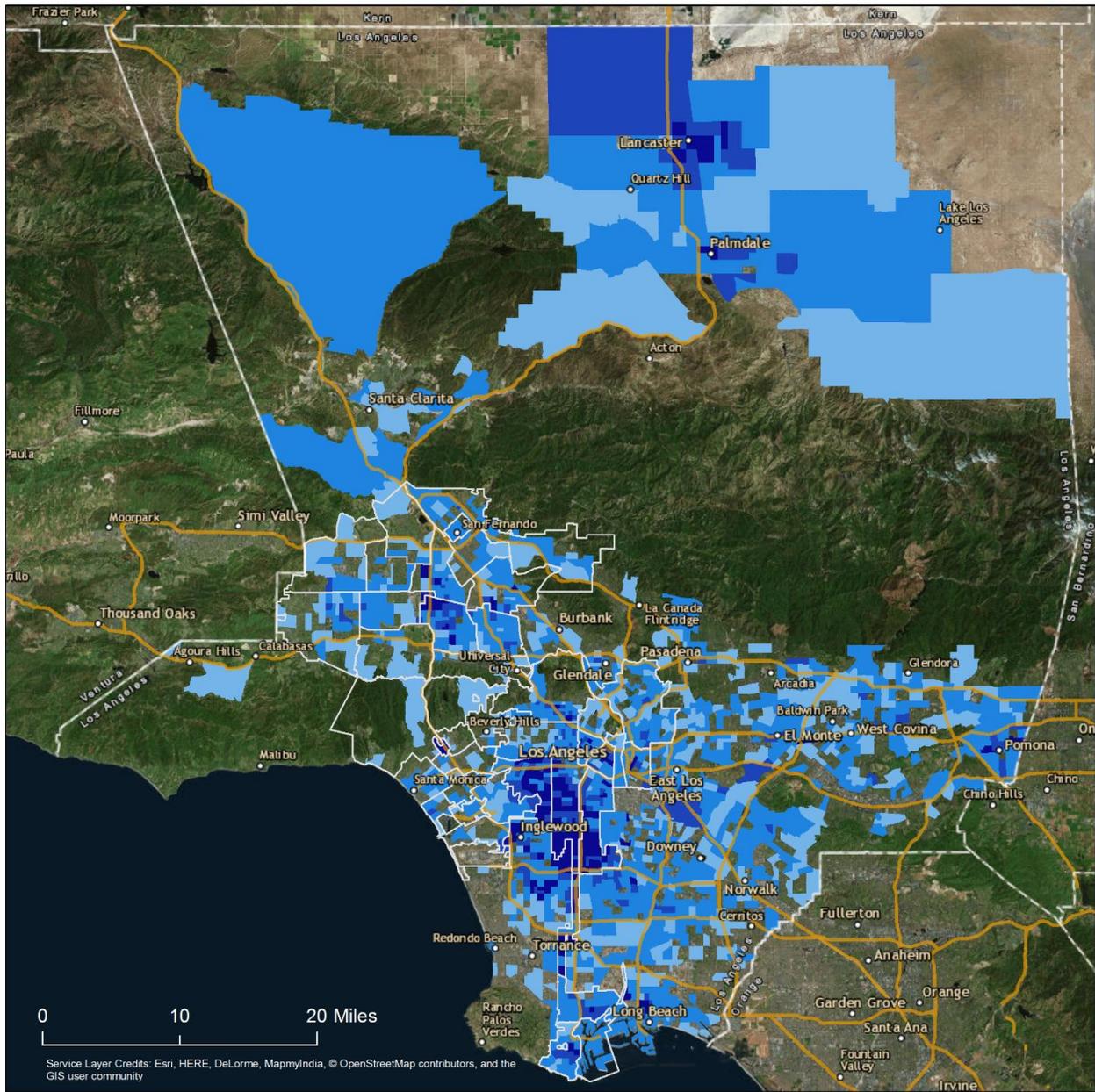


Figure 10

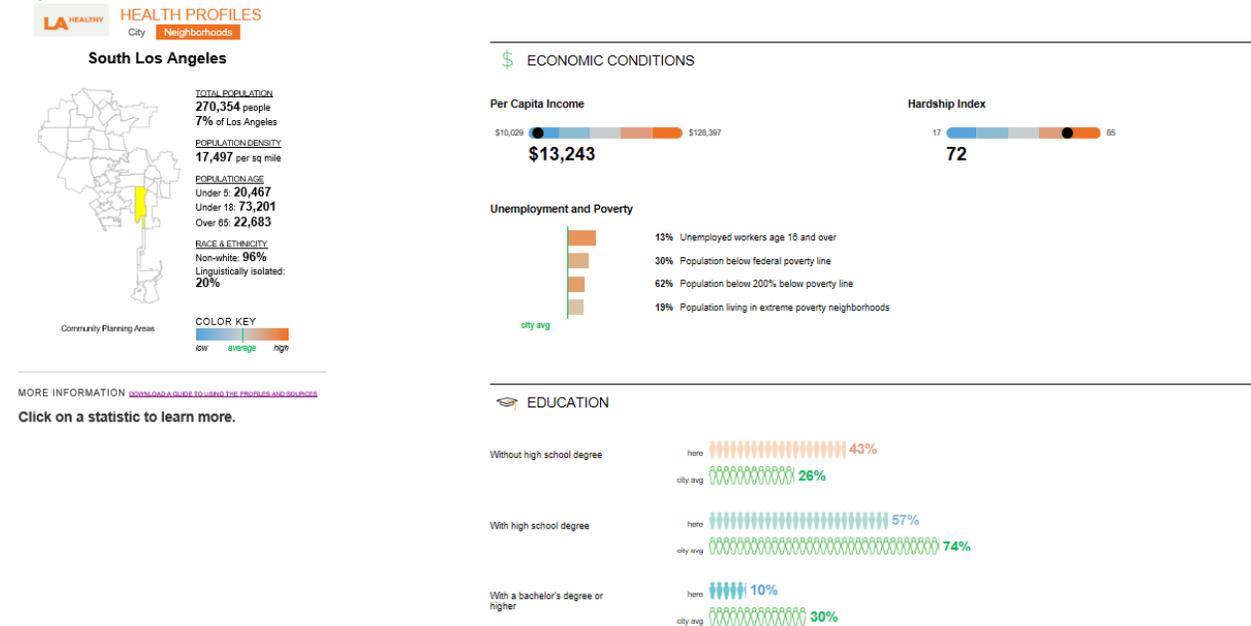
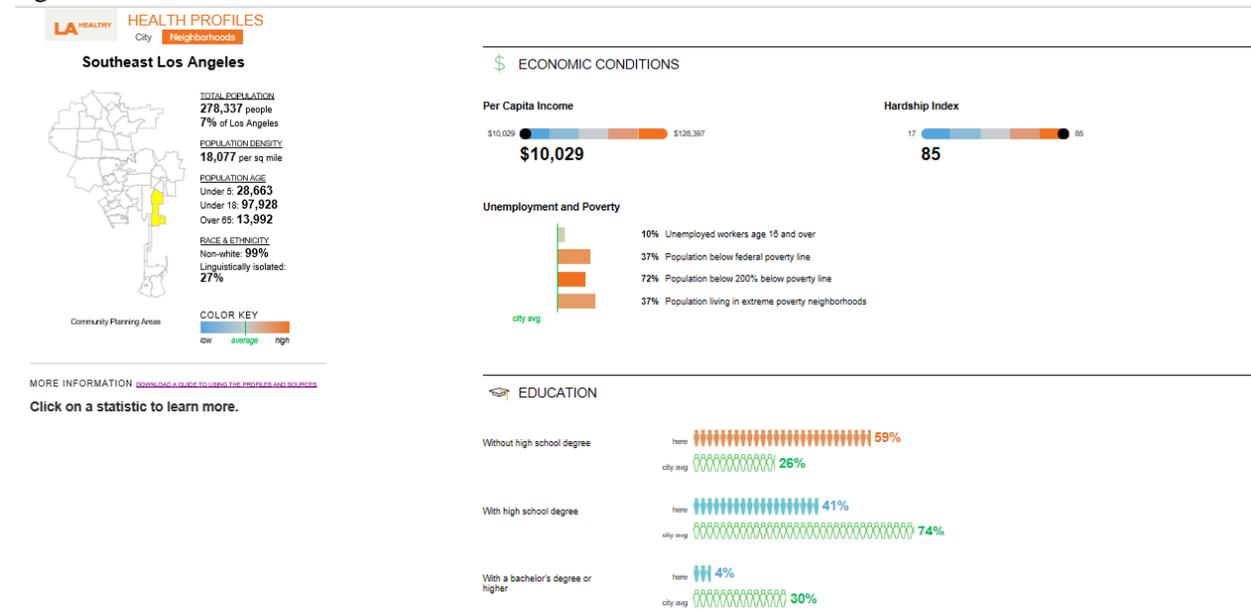
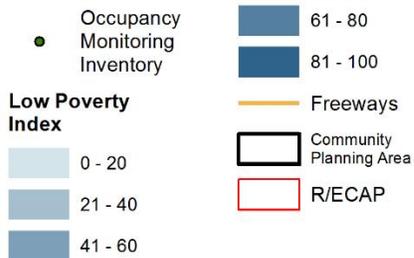
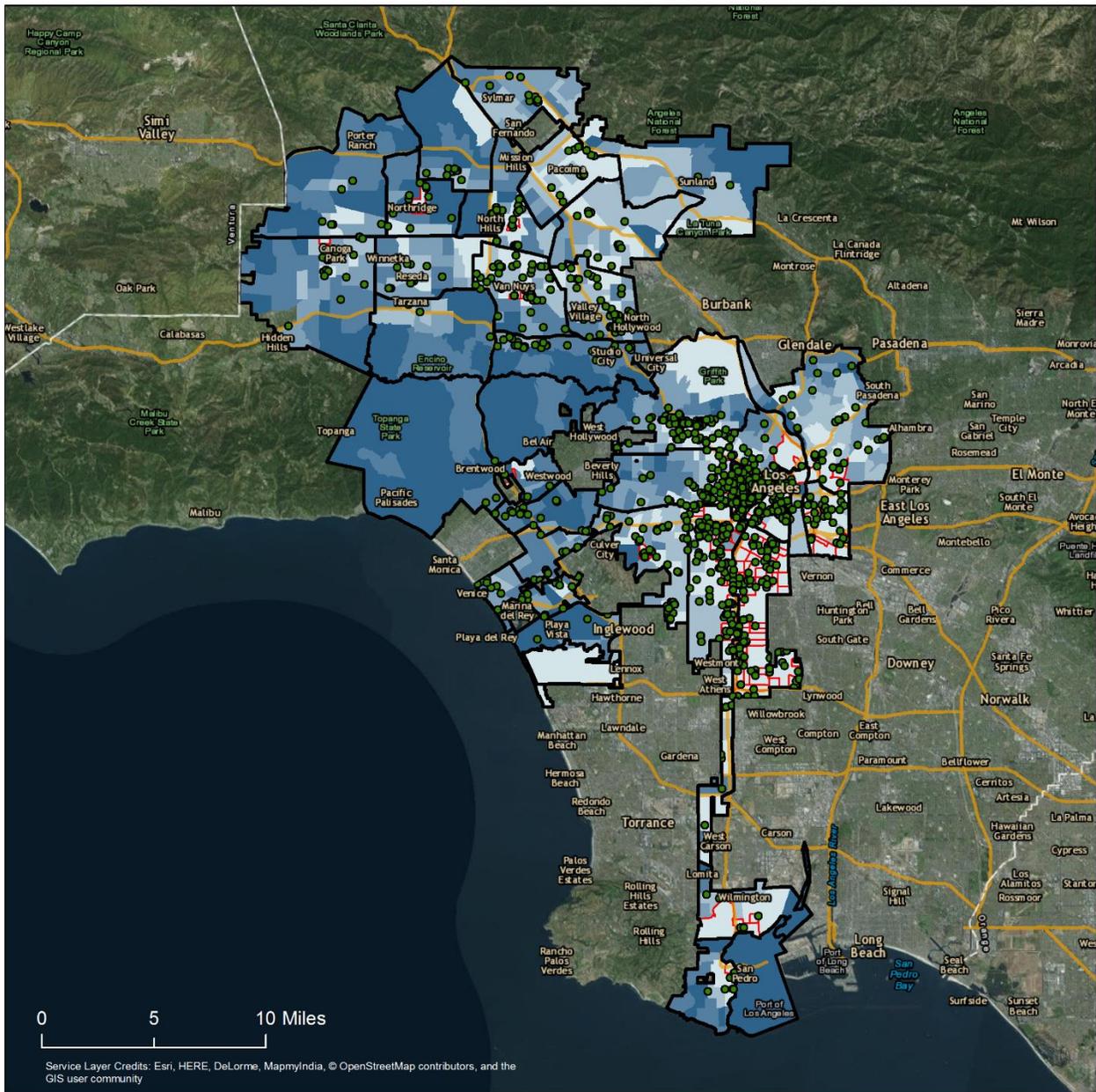


Figure 11



Map 12

City of L.A. AFH: Occupancy Monitoring Inventory and Low Poverty Index



All of the above factors affect disparities in access to low poverty neighborhoods by limiting mobility and movement to high opportunity neighborhoods. Place-based strategies to reduce poverty in high poverty areas also face significant and numerous challenges to design, funding, and implementation—from stagnant wages, a mismatch of job needs and skills, and more. The City recently increased the minimum wage to \$12 per hour (with the goal of increasing minimum wage to \$15 by 2021),¹²⁶ meaning someone working 40 hours per week and 52 weeks per year (with no time off) would make just under \$25,000. While this would pull families of three or less above the poverty line, any families of four or larger relying on this income would still fall under the poverty line. Also, this annual income is still less than half the Area Median Income for Los Angeles. So, while raising the minimum wage will help lift some above the poverty line, the City will need to consider additional strategies to reducing the poverty in areas scoring poorly on the Index.

e. Access to Environmentally Healthy Neighborhoods

For the protected class groups HUD has provided data, describe disparities in access to environmentally healthy neighborhoods by protected class groups.

The majority of the City of Los Angeles has poor quality environmental health access, with the exception of West LA and portions of the Valley area where scores are moderate rather than low. Below, Map 1 of the HUD-provided data shows that areas within R/ECAPs have some of the worst Environmental Health Index scores. HUD's Environmental Health Index measures exposure based on the Environmental Protection Agency's (EPA) estimates of air quality and carcinogenic, respiratory, and neurological toxins by neighborhood. The Index measures risk across broad geographic areas with values ranging from 0 – 100. Higher index values are associated with less exposure to toxins and reflect better environmental quality in neighborhoods. As demonstrated below, residents in R/ECAPs within the Harbor area of the City along with R/ECAPs in Southeast LA have some of the lowest access to environmentally healthy neighborhoods.

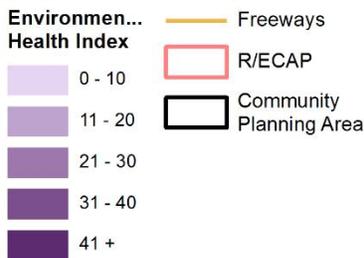
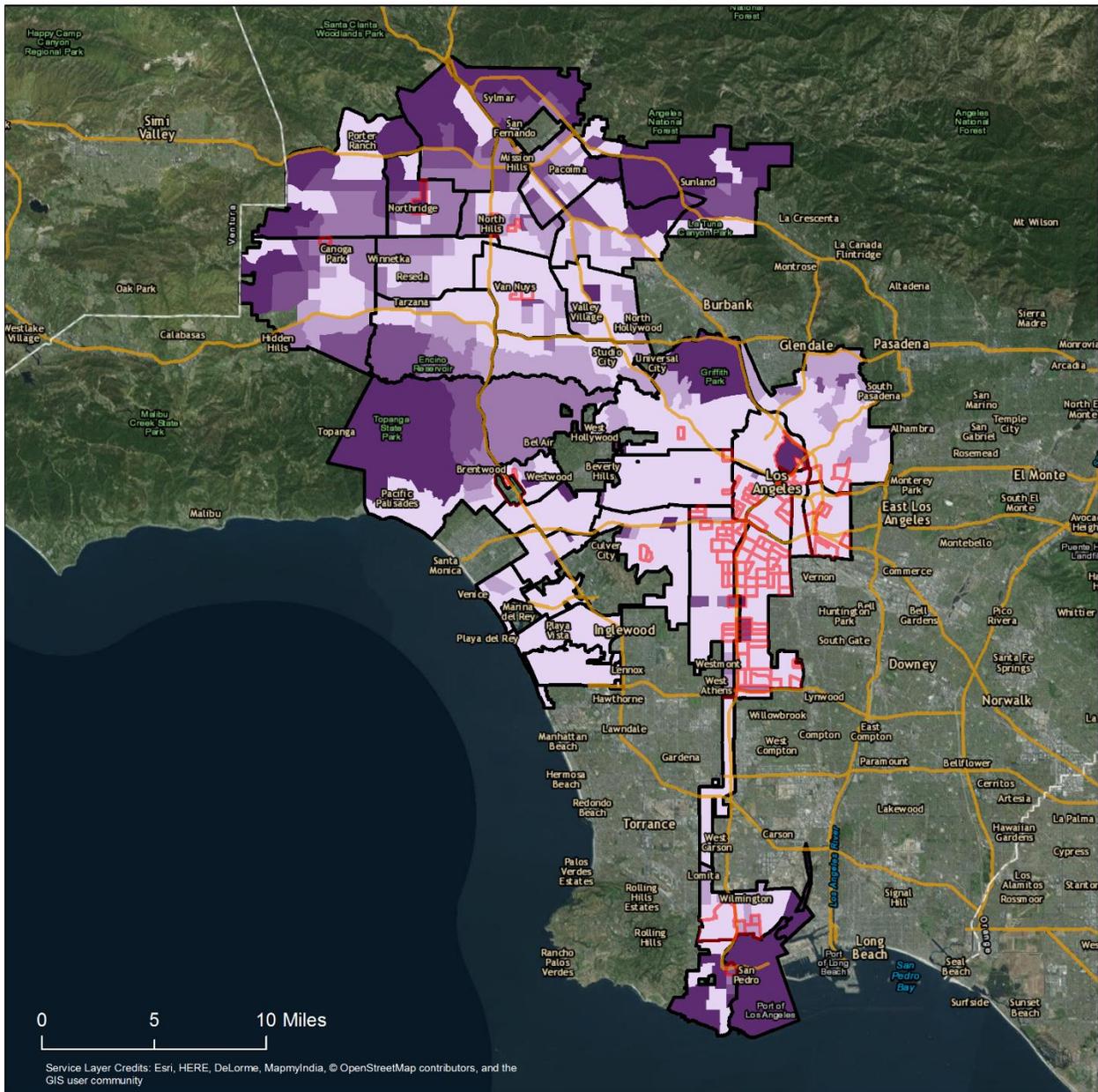
Map 2 and 3 show the racial and ethnic composition of R/ECAP areas overlaying Environmental Health Index shading.¹²⁷ The maps show that larger shares of Black and Hispanic residents live in neighborhoods with low environmental health access. The northern part of East LA, just outside of the R/ECAP tracts, also has concentrations of Asians. Breaking this out further, Map 4 provides the distribution of the top five national origin groups in LA. Southeast LA is far more densely populated with members of these national origin groups than are neighborhoods within the Harbor area. Specifically, Southeast LA is home to a larger portion of Mexican Americans. Areas within Boyle Heights also have a higher share of Mexican Americans living in areas with low Environmental Health Index scores while Koreatown and the Westlake District, which also rank low in access to environmentally healthy neighborhoods, include higher percentages of Asians. Within the Asian community, which includes individuals of several national origins, LA City has a higher share of Koreans than it does of other Asian nationalities. In some tracts within Koreatown and the Westlake District, the Korean population is as high as 40%.

¹²⁶ <http://www.latimes.com/business/la-fi-minimum-wage-los-angeles-20170701-story.html>

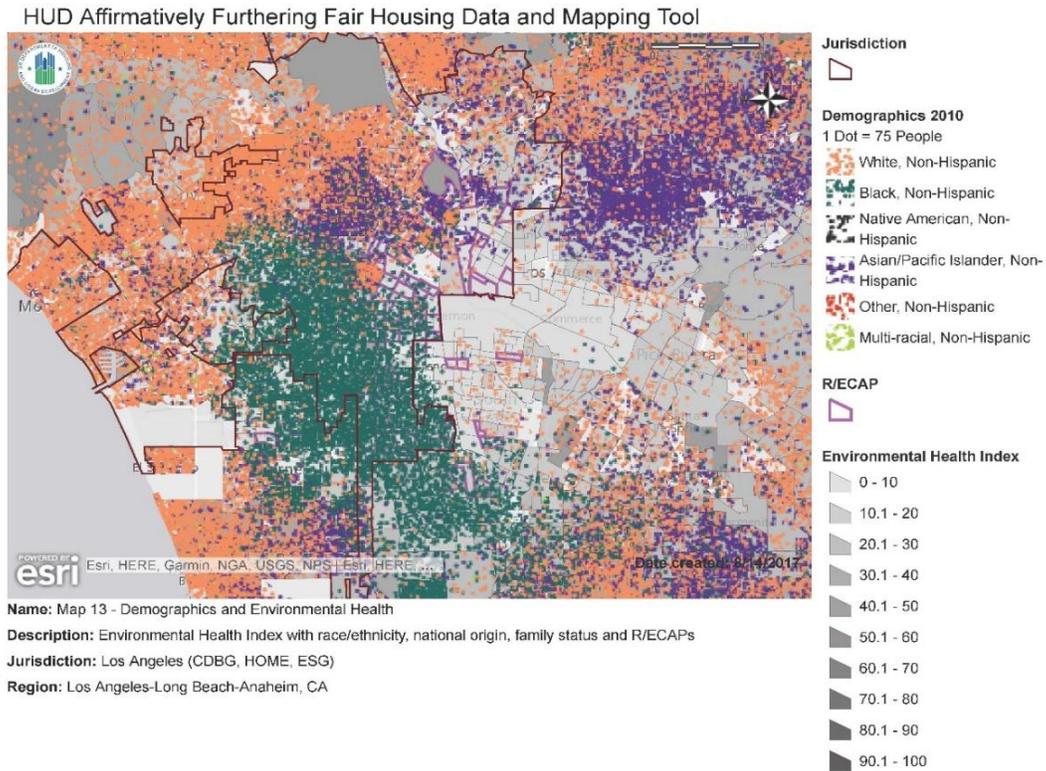
¹²⁷ Map 2 does not depict the Hispanic population, and Map 3 does not depict the Black population. Because many neighborhoods in South LA have large Black and Hispanic populations, depicting both groups through a dot density map on the same map can obscure patterns of concentration. By depicting each group on a separate map, it is easier to see the overlay of racial and ethnic concentration with access to environmentally healthy neighborhoods.

Map 1

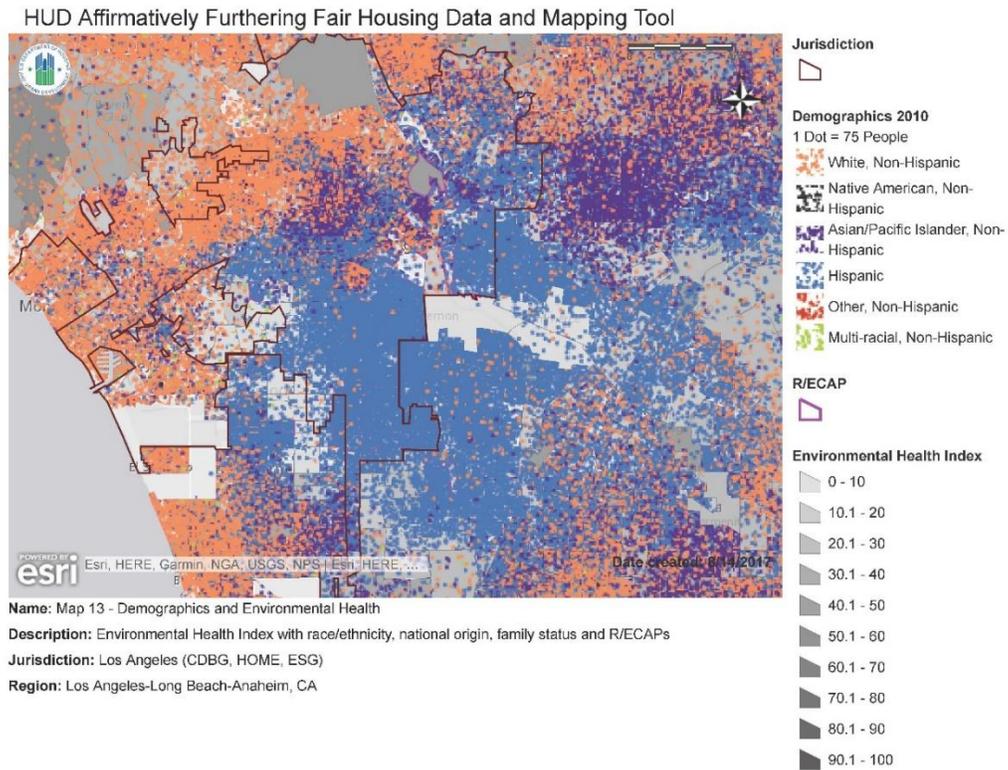
City of Los Angeles: Environmental Health Index



Map 2 Demographics and Environmental Health for Central Los Angeles City



Map 3 Demographics and Environmental Health for White, Non-Hispanic, Asian, and Hispanic



Map 4 Demographics and Environmental Health with Top 5 National Origin Populations

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

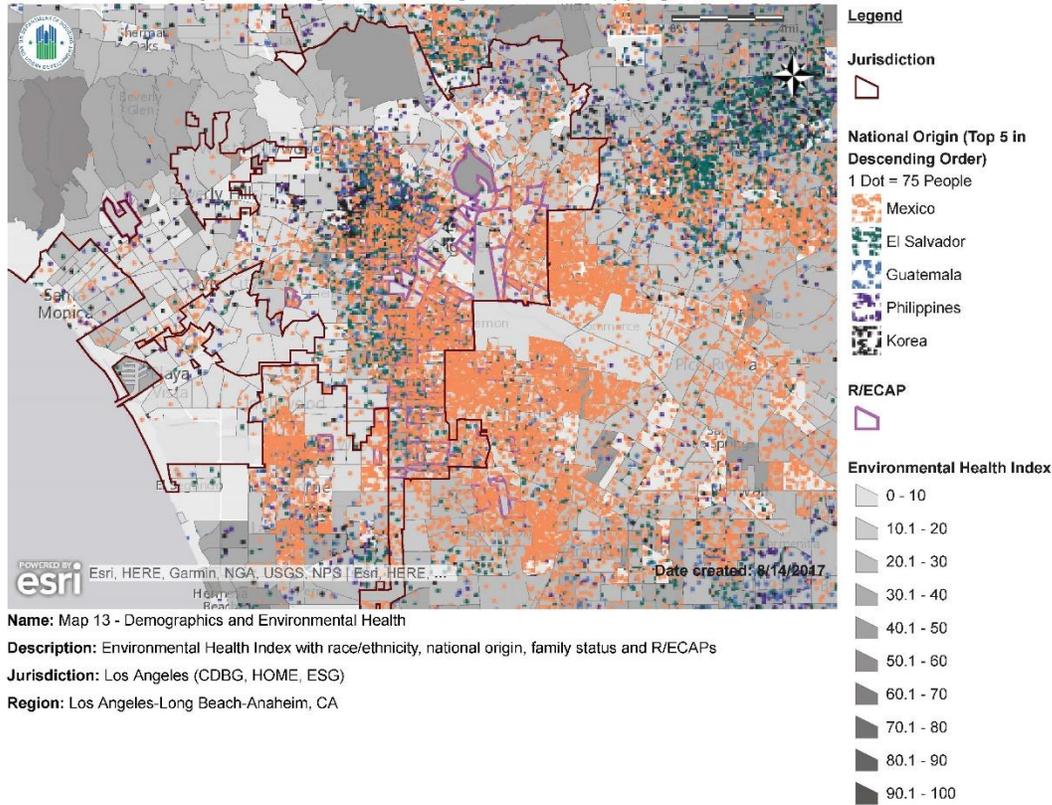


Table 5

(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	57.93	66.39	68.23	81.08	82.87	47.60	17.72
Black, Non-Hispanic	27.68	35.38	32.64	85.39	88.08	46.67	9.12
Hispanic	25.84	41.88	32.80	84.89	87.23	43.10	12.09
Asian or Pacific Islander, Non-Hispanic	43.16	55.02	54.13	84.83	87.77	46.88	12.88
Native American, Non-Hispanic	37.48	50.46	45.47	83.58	86.17	46.39	14.83
Population below federal poverty line							
White, Non-Hispanic	46.73	61.43	60.25	85.00	87.84	47.10	13.62
Black, Non-Hispanic	18.53	30.29	24.51	87.01	89.53	45.30	8.21
Hispanic	17.65	37.54	28.17	86.70	89.79	44.56	9.49
Asian or Pacific Islander, Non-Hispanic	34.48	53.09	49.34	88.18	92.15	49.66	8.49
Native American, Non-Hispanic	20.52	40.60	33.38	87.46	91.04	48.99	8.23
(Los Angeles-Long Beach-Anaheim, CA) Region							
Total Population							
White, Non-Hispanic	65.34	68.73	67.34	76.59	79.87	46.74	38.36
Black, Non-Hispanic	36.77	37.95	36.13	81.34	83.42	46.12	23.65
Hispanic	36.01	43.05	35.43	80.65	83.98	43.16	25.56
Asian or Pacific Islander, Non-Hispanic	55.68	64.53	57.42	78.82	82.35	45.30	31.29
Native American, Non-Hispanic	48.97	52.60	48.40	78.04	81.53	44.84	33.60
Population below federal poverty line							
White, Non-Hispanic	53.04	61.26	59.07	80.43	84.23	48.46	32.62
Black, Non-Hispanic	23.71	30.73	26.45	83.34	85.48	44.58	21.67
Hispanic	24.25	37.27	28.83	83.28	86.96	43.89	21.76
Asian or Pacific Islander, Non-Hispanic	45.15	58.20	50.53	82.27	86.69	47.52	27.36
Native American, Non-Hispanic	32.13	38.92	34.86	80.82	84.18	47.51	25.97

Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA Refer to the Data Documentation for details (www.hudexchange.info).

For the protected class groups HUD has provided data, describe which protected class groups have the least access to environmentally healthy neighborhoods.

Looking at Table 5, it is evident that Black and Hispanic residents fare worse in accessing environmentally healthy areas within the City than do other racial and ethnic groups. Furthermore, income appears to play a limited role in determining access to environmentally healthy neighborhoods with only a slight difference in access between Black residents above and below the poverty line. This could be attributed to high concentrations of Black and Hispanic individuals in South and Southeast LA across income levels, a phenomenon that may be reflective of steering by real estate agents and other private discrimination. By contrast, access to environmentally healthy neighborhoods among Asians drops based on income with those living below the poverty line having less access to environmentally healthy areas.¹²⁸ This shift among Asians can be attributed to their concentration within Project Based Section 8 housing and other HUD assisted multifamily housing within Koreatown and the Westlake District, as shown by Table 6.

South LA, which is predominantly Black and Hispanic, has a history of air pollution, contaminated land, and residential areas within proximity to freeways and industrial pollution. Residents in South LA are affected daily by pollutants from multiple sources, including air, land, and water. Where residents live and work has a significant impact on individual and community health outcomes, life expectancy, and quality of life. Thus, living and working near industrial sites can have serious health impacts for neighboring communities that are also disproportionately minority residents. Residents of R/ECAPs face some of the highest exposure and proximity to environmental health hazards in Los Angeles. The concentration of environmental health hazards in these areas contributes to the maintenance of R/ECAPs, since most people that can move to a location with greatly reduced exposure to environmental health hazards will likely choose to do so. With most affordable and publicly supported housing placed in areas experiencing higher exposure to environmental hazards, there are few options for R/ECAP residents to relocate to less burdened parts of the city. Residents who cannot move from areas with the highest burden of environmental hazards correspondingly suffer from decreased access to amenities that are indicative of high quality environmental health. However, as part of California's Cap and Trade program (recently extended to 2030), the State created California Climate Investments from the proceeds of the program to reduce the environmental hazard burden. These funds are aimed at improving public health, quality of life, and economic opportunity in California's most burdened communities at the same time they are reducing pollution that causes climate change.

A variety of industries are located within South LA, including auto body shops, gas stations, metal recycling plants, and garment factories. Many of these industrial uses are located near residential areas and expose the community to toxic pollutants that pose serious health risks. According to the Los Angeles Health Atlas report, up to 21% of residents in Southeast LA live near deadly toxic land industries.¹²⁹ Using the CalEnviroScreen 3.0, which is the Environmental Screening Tool of the Office of Environmental Health Hazard Assessment, Map 7 shows that South LA is primarily red, indicating the presence of census tracts that are designated as Disadvantaged Communities under California Senate Bill (SB) 535. SB 535 guides state and local investments that aspire to improve environmental health conditions in the State's

¹²⁸ The higher index value is associated with less exposure to toxins, alternatively higher values designate higher environmental health access with better environmental quality in a neighborhood.

¹²⁹ City of Los Angeles Department of Planning. *The Health Atlas for the City of Los Angeles*, June 2013, <http://planning.lacity.org/cwd/framwk/healthwellness/text/HealthAtlas.pdf>. Assessed August 2017

disadvantaged communities.¹³⁰ It allows the California Environmental Protection Agency (CalEPA) to identify disadvantaged communities in order to utilize Greenhouse Gas Reduction Fund (GGRF) programs in a targeted fashion based on geographic, socio-economic, public health, and environmental hazard criteria. Recent State legislation directed that at least 25% of funds go to projects within and benefitting disadvantaged communities and at least an additional 10% for low-income households or communities. In April 2017, the State designated specific “disadvantaged communities” to receive this funding. Since these communities have only recently been designated, there are no results yet to indicate that the environmental health of these neighborhoods has improved, thereby lowering the disparity in access to opportunity. As demonstrated in Map 8, a disproportionate majority of South LA is designated as SB 535 Disadvantaged Communities and AB 1500 Low Income Communities. Furthermore, there are several additional tracts that are identified as AB 1500 Low Income Communities within a half mile of SB 535 Disadvantaged Communities (Map 8). South LA is burdened by multiple forms of industrial pollution, including hazardous waste, generators, and contaminated lands.

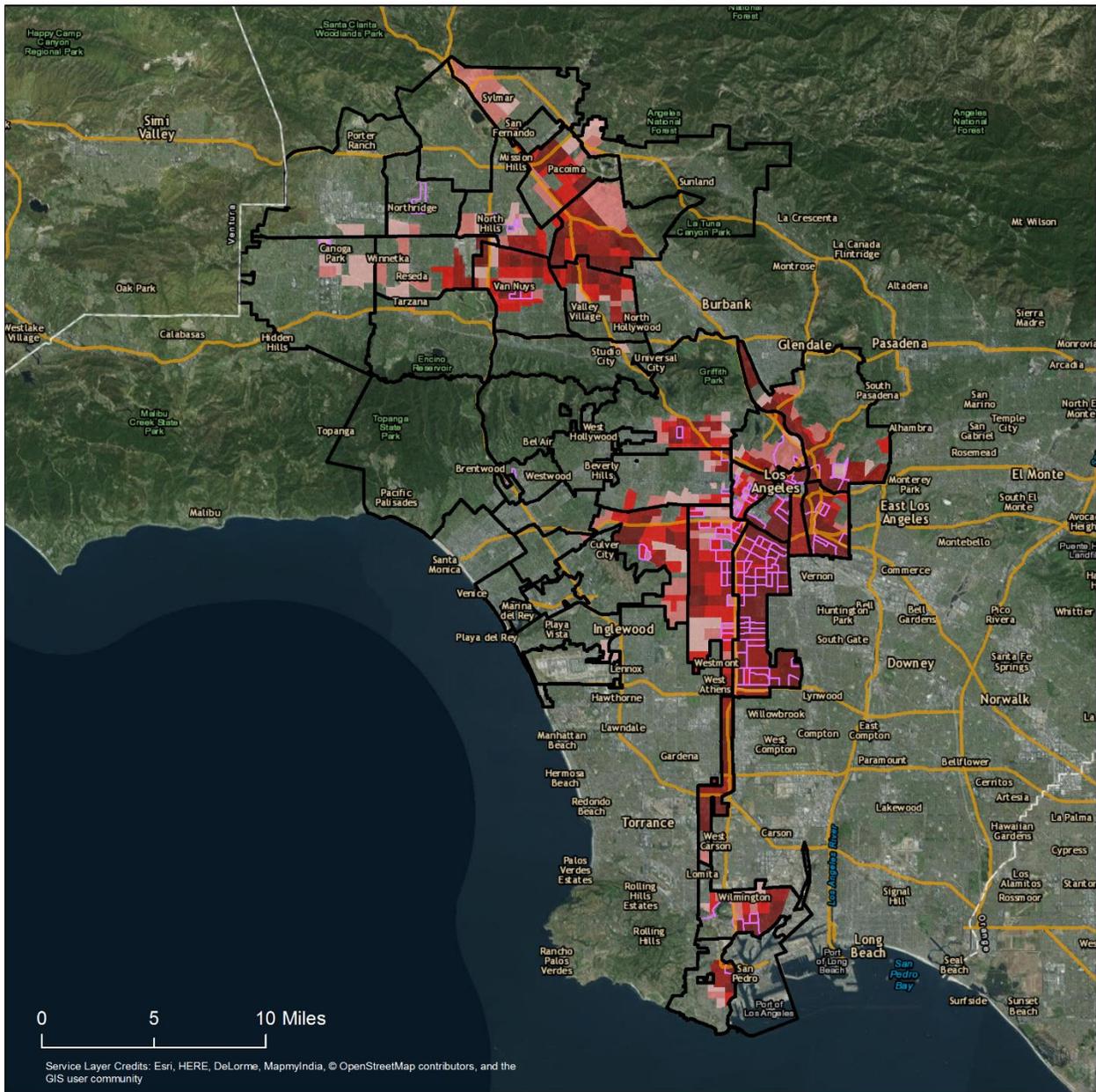
Table 6

(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	223	3.17%	1,685	23.98%	4,918	69.99%	201	2.86%
Project-Based Section 8	4,382	21.58%	3,863	19.02%	5,617	27.66%	6,409	31.56%
Other Multifamily	851	30.13%	280	9.92%	672	23.80%	1,013	35.87%
HCV Program	9,449	22.10%	23,039	53.89%	9,005	21.06%	1,178	2.76%
Total Households	510,140	38.62%	146,570	11.10%	471,240	35.67%	162,019	12.27%
0-30% of AMI	73,675	25.53%	47,200	16.35%	126,635	43.88%	34,589	11.98%
0-50% of AMI	112,300	22.83%	70,530	14.34%	232,130	47.19%	54,289	11.04%
0-80% of AMI	181,610	25.11%	96,015	13.27%	338,220	46.76%	79,799	11.03%
(Los Angeles-Long Beach-Anaheim, CA) Region								
Housing Type								
Public Housing	683	6.99%	2,627	26.90%	6,110	62.56%	344	3.52%
Project-Based Section 8	9,154	23.86%	6,942	18.10%	10,365	27.02%	11,753	30.64%
Other Multifamily	1,707	33.38%	465	9.09%	1,094	21.39%	1,839	35.96%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	1,766,510	41.80%	333,080	7.88%	1,405,070	33.25%	629,349	14.89%
0-30% of AMI	215,775	29.59%	86,225	11.83%	305,885	41.95%	105,314	14.44%
0-50% of AMI	343,565	26.07%	135,740	10.30%	587,685	44.60%	175,814	13.34%
0-80% of AMI	590,895	28.77%	195,155	9.50%	905,370	44.09%	272,549	13.27%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: #s presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).								

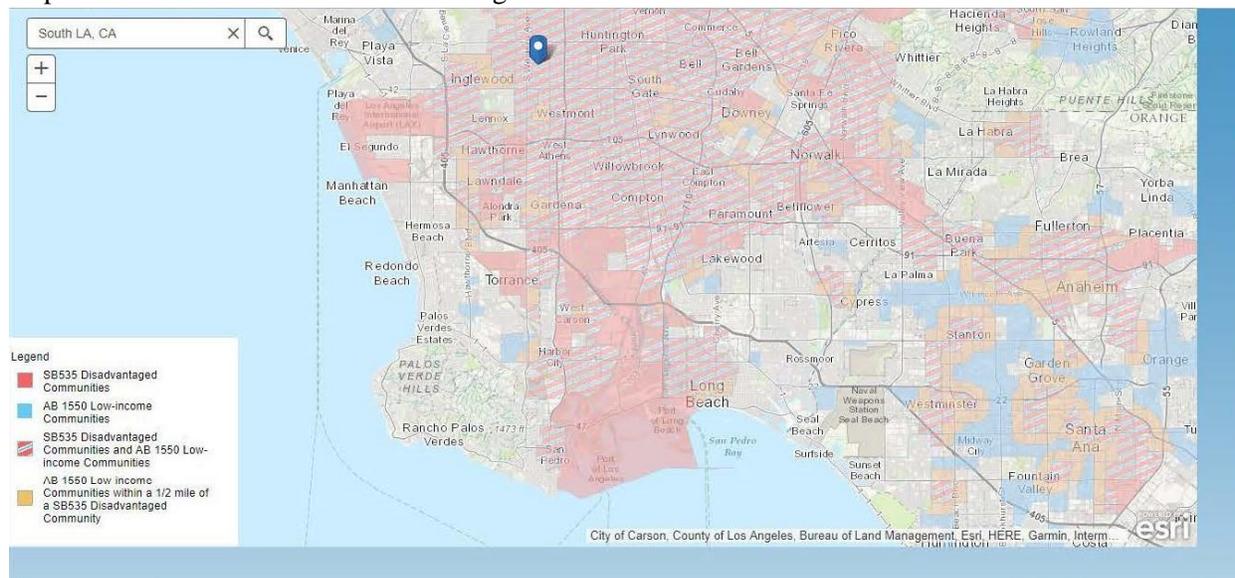
¹³⁰ California Environmental Protection Agency. Designation of Disadvantaged Communities Pursuant to Senate Bill 535, April 2017, <https://calepa.ca.gov/wp-content/uploads/sites/34/2017/04/SB-535-Designation-Final.pdf>.

Map 7

City of L.A. AFH: CalEnviroScreen 3.0 Disadvantaged Communities Top 25%



Map 8 Environmental Health: Disadvantaged and Low-Income Communities Investments



Source: California Air Resources Board's Disadvantaged and Low-income Communities Investments

Heavy industrial uses are known to emit toxic air pollutants while also leaving behind soil that is contaminated with lead and arsenic. These types of toxins cause a host of health issues for individuals who are exposed. Health issues include asthma, cancer, low birth weight, and developmental issues. According to the LA Health Atlas, the top causes of death in the Service Planning Area (SPA) encompassing South LA include coronary heart disease, stroke, and lung cancer in descending order. Areas within South LA and adjacent to South and Southeast LA also have the highest rates of hospitalization and emergency visits caused by asthma in adults and children in the region. South LA is primarily low income, and 70% of residents are Hispanic while 24% are Black.

LA County Health Survey results confirm these trends. LA County divides its Service Planning Areas into eight geographic areas that allow for the Department of Public Health to develop and provide relevant health related services to meet specific needs of residents (Map 9). Based on the LA County Health Survey (2007, 2011, and 2015), Table 10, provides a breakdown of the percent of adults within each SPA who are obese and have ever diagnosed with diabetes¹³¹ and shows that up to 34% of adults within the South SPA are obese. The South SPA has higher percentages of Hispanic and Black residents and services communities including Athens, Compton, Crenshaw, Florence, Hyde Park, Lynwood, Paramount, and Watts. Table 11, which displays the percentage of children 0 – 17 years old with current asthma (ever diagnosed and still has asthma and/or had an asthma attack in the past 12 months) and the percent of children 0 – 17 years whose community's access to fresh fruits/vegetables was rated as excellent or good. The South and East SPA report two of the highest per capita levels of asthma among children. Although exposure to higher pollution does not cause asthma, it can however trigger asthma symptoms or an asthma attack. Similar to rates of adults with higher negative health outcomes, children who reside in neighborhoods with low environmental health scores also exhibit higher rates of asthma and low access to fresh fruits and vegetables.

¹³¹ Weight status is based on Body Mass Index (BMI) calculated from self-reported weight and height. According to the NHLBI clinical guidelines, a BMI <18.5 is underweight, a BMI ≥ 18.5 and <25 is normal weight, a BMI ≥ 25 and <30 is overweight, and a BMI ≥30 is obese.

The LA County Health Survey indicators show low health outcomes in the same areas that also show higher exposure to toxins and pollutants.¹³²

In reviewing Table 11, it is apparent that overall health outcomes, particularly access to healthier food options, is significantly influenced by place of residence. Out of the eight SPAs, the South SPA ranked the lowest (55.5%) in terms of children's access to fresh fruits and vegetables, further compounding health outcomes for chronic illnesses, such as obesity and diabetes. Furthermore, 28.9% of children in grades 5, 7, and 9 are obese within the South SPA.¹³³ Adults within the South SPA also have higher rates of cardiovascular disease, including 29% of adults were diagnosed with hypertension and 25% were diagnosed with high cholesterol. Map 12 shows the availability of health services throughout the City. There is a variety of services available including primary care facilities and hospitals, along with services provided by the Department of Mental Health (DMH) within South LA; however, the Harbor area is particularly lacking in most health services. Services identified by the DMH can vary from primary care to publicly supported hospitals. The 2013 Health Atlas for the City of LA identified the southern and southeast portion of the City as a Health Professional Shortage Area (HPSA), which is a federal designation to areas, based on the ratio of population to doctors and access, that have a shortage of healthcare professionals, including primary care, dentists, and mental health professionals. Along with South LA, the Health Atlas also identified areas within the Valley that exhibit higher rates of poverty, including Arleta-Pacoima and Valley Village, as HPSAs. It is important to note that access to health services can also be affected by an individual's ability to acquire those services utilizing public transportation. Outside of the central portion of East LA, accessing health care facilities by public transportation requires navigating a maze of transfer points between rail and bus services (Map 13).

Many areas in LA that are affordable also include large enclaves of ethnic minorities and exhibit low health outcomes. This remains true for transgender and gender non-binary individuals. Transgender and gender non-conforming individuals encounter many roadblocks to accessing health services. A recent study completed by The TransLatin@ Coalition surveyed 129 participants in Southern California and identified that up to 57.4 % of respondents made less than \$10,000 and nearly 49.5% of study participants were covered under Medicare, Medicaid, or Medi-Cal. 36% of participants attributed their unmet medical needs to a lack of personal resources, and 32% agreed that a lack of trans sensitive health care providers prevented them from accessing services.¹³⁴ Nearly 50.5% of study participants reported to be experiencing anxiety, and up 43.7% attributed their inability to meet their mental health needs to a lack of support groups. Approximately 49% of those experiencing anxiety are receiving mental health services, but the remaining 51% are not receiving any mental health care to treat their anxiety. Up to 31.2% relied on the emergency room as their primary location to access medical care. The top reasons survey respondents identified for not being able to access health services included lack of resources, lack of trans sensitive providers, and long distance to services. Although many of the survey participants indicated that they are able to access to health care through Medi-Cal or Medicaid, others are able to access other public health programs due to

¹³² The information presented is based on self-reported data from a randomly-selected, representative sample of (8,008, 8,036, and 7,200 corresponding to 2015, 2011, and 2007) Los Angeles County adults. The 95% confidence intervals (CI) represent the margin of error that occurs with statistical sampling, and means that the actual prevalence in the population, 95 out of 100 times sampled, would fall within the range provided.

¹³³ County of Los Angeles Public Health, Health Facts for Service Planning Areas, <http://publichealth.lacounty.gov/chs/SPA6/index.htm>. Assessed October 2017.

¹³⁴ The TransLatino Coalition. *The State of Trans Health: Trans Latinos and Their Healthcare Needs*, https://static1.squarespace.com/static/55b6e526e4b02f9283ae1969/t/583dee0a579fb3beb5822169/1480453645378/TLC-The_State_of_Trans_Health-WEB.pdf. Assessed on October 2017.

their HIV status. However, those with the least access to medical services included survey participants who are not HIV positive or are not U.S. citizens or lack immigration documentation altogether.

Map 9 Los Angeles County Department of Mental Health Service Areas



Table 10

Percent of Adults (18+ years old) Who Are Obese				
Obesity (current prevalence)	Percent	<u>2015</u> 95% CI		Estimated #
LA County	23.5%	22.2	- 24.9	1,717,000
City of Los Angeles	22.3%	20.2	- 24.4	624,000
Service Planning Area				
Antelope Valley	29.6%	25.4	- 33.8	81,000
San Fernando	19.8%	17.3	- 22.4	317,000
San Gabriel	23.8%	20.5	- 27.1	310,000
Metro	22.1%	17.8	- 26.3	194,000
West	10.3%	7.4	- 13.1	53,000
South	34.1%	29.5	- 38.7	230,000
East	28.0%	23.8	- 32.3	256,000
South Bay	24.1%	20.5	- 27.6	275,000
Percent of Adults (18+ years old) Ever Diagnosed with Diabetes				
Access to Fresh Fruits/Vegetables Excellent/Good	Percent	<u>2015</u> 95% CI		Estimated #
LA County	9.8%	9.0	- 10.6	758,000
City of Los Angeles	10.0%	8.6	- 11.3	297,000
Service Planning Area				
Antelope Valley	13.9%	10.4	- 17.4	39,000
San Fernando	8.2%	6.6	- 9.9	139,000
San Gabriel	9.1%	7.2	- 11.0	127,000
Metro	11.6%	8.8	- 14.3	107,000
West	4.5%	2.9	- 6.1	24,000
South	12.3%	9.5	- 15.1	90,000
East	11.2%	8.6	- 13.8	108,000
South Bay	10.4%	8.3	- 12.5	285,000

Source: 2007, 2011, and 2015 Los Angeles County Health Survey
Office of Health Assessment and Epidemiology
Los Angeles County Department of Public Health

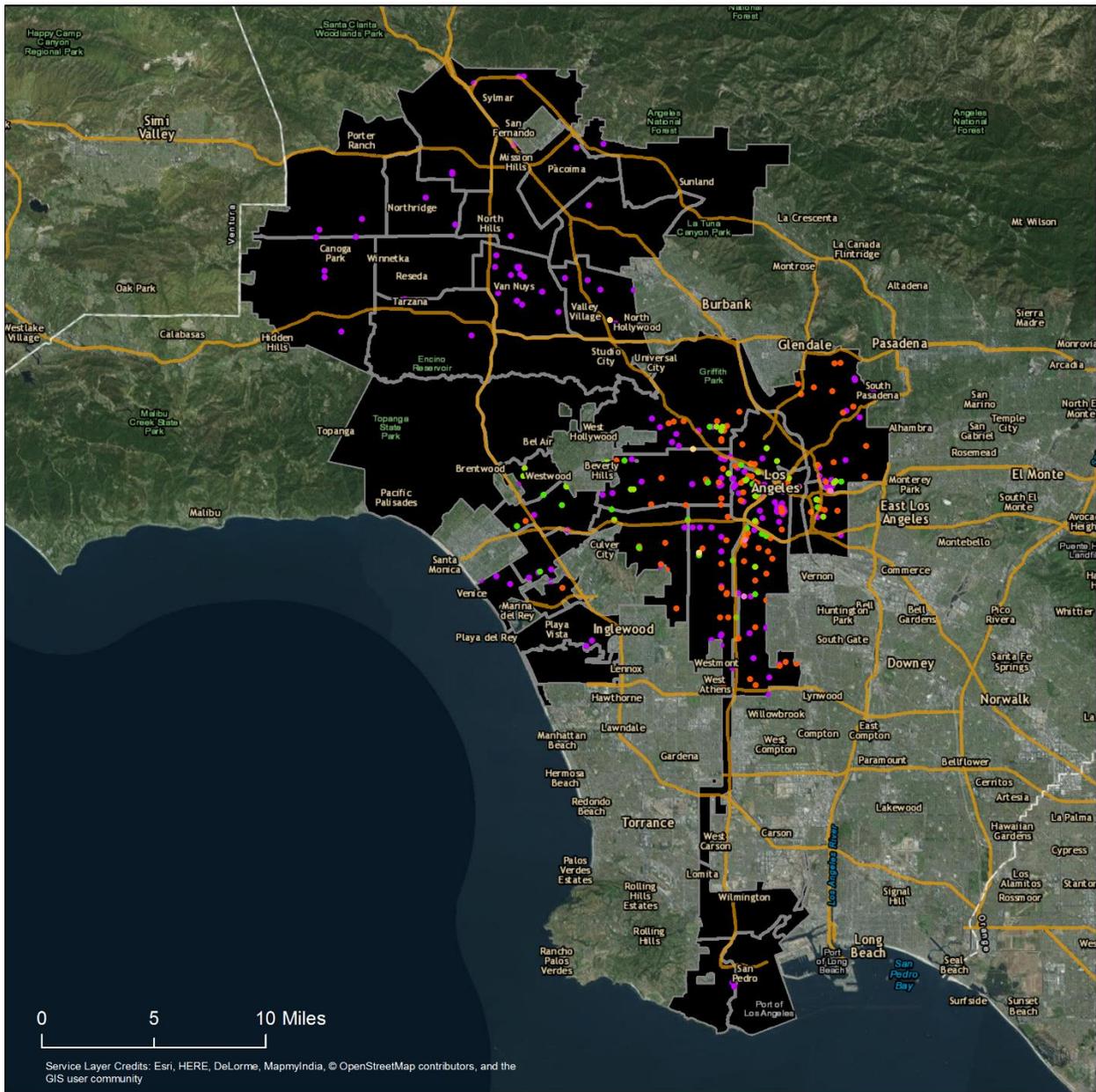
Table 11

Percent of Children (0-17 years old) With Current Asthma (Ever Diagnosed with Asthma AND Either Currently Still Has Asthma and/or Had an Asthma Attack in the past 12 months)					
Asthma (current prevalence)	Percent	<u>2015</u> 95% CI			Estimated #
LA County	7.4%	6.3	-	8.5	171,000
City of Los Angeles	5.7%	4.2	-	7.2	49,000
Service Planning Area					
Antelope Valley	14.2%	8.5	-	19.9	15,000
San Fernando	6.6%	4.5	-	8.7	32,000
San Gabriel	6.2%	3.5	-	8.9	24,000
Metro	5.9%	2.5	-	9.2	13,000
West	6.7%	3.6	-	9.9	7,000
South	7.8%	4.8	-	10.8	24,000
East	9.8%	5.8	-	13.7	33,000
South Bay	6.3%	4.0	-	8.5	23,000
Percent of Children (0-17 years old) with Their Community's Access to Fresh Fruits/Vegetables Rated as Excellent or Good.					
Access to Fresh Fruits/Vegetables Excellent/Good	Percent	<u>2015</u> 95% CI			Estimated #
LA County	74.7%	72.7	-	76.7	1,743,000
City of Los Angeles	71.5%	68.1	-	74.9	618,000
Service Planning Area					
Antelope Valley	71.5%	65.4	-	77.7	78,000
San Fernando	80.4%	75.9	-	84.8	390,000
San Gabriel	81.5%	77.2	-	85.8	323,000
Metro	69.5%	62.8	-	76.3	158,000
West	91.7%	87.6	-	95.9	97,000
South	55.5%	49.2	-	61.7	168,000
East	71.5%	65.7	-	77.3	245,000
South Bay	77.8%	72.9	-	82.8	285,000

Source: 2007, 2011, and 2015 Los Angeles County Health Survey
Office of Health Assessment and Epidemiology
Los Angeles County Department of Public Health

Map 12

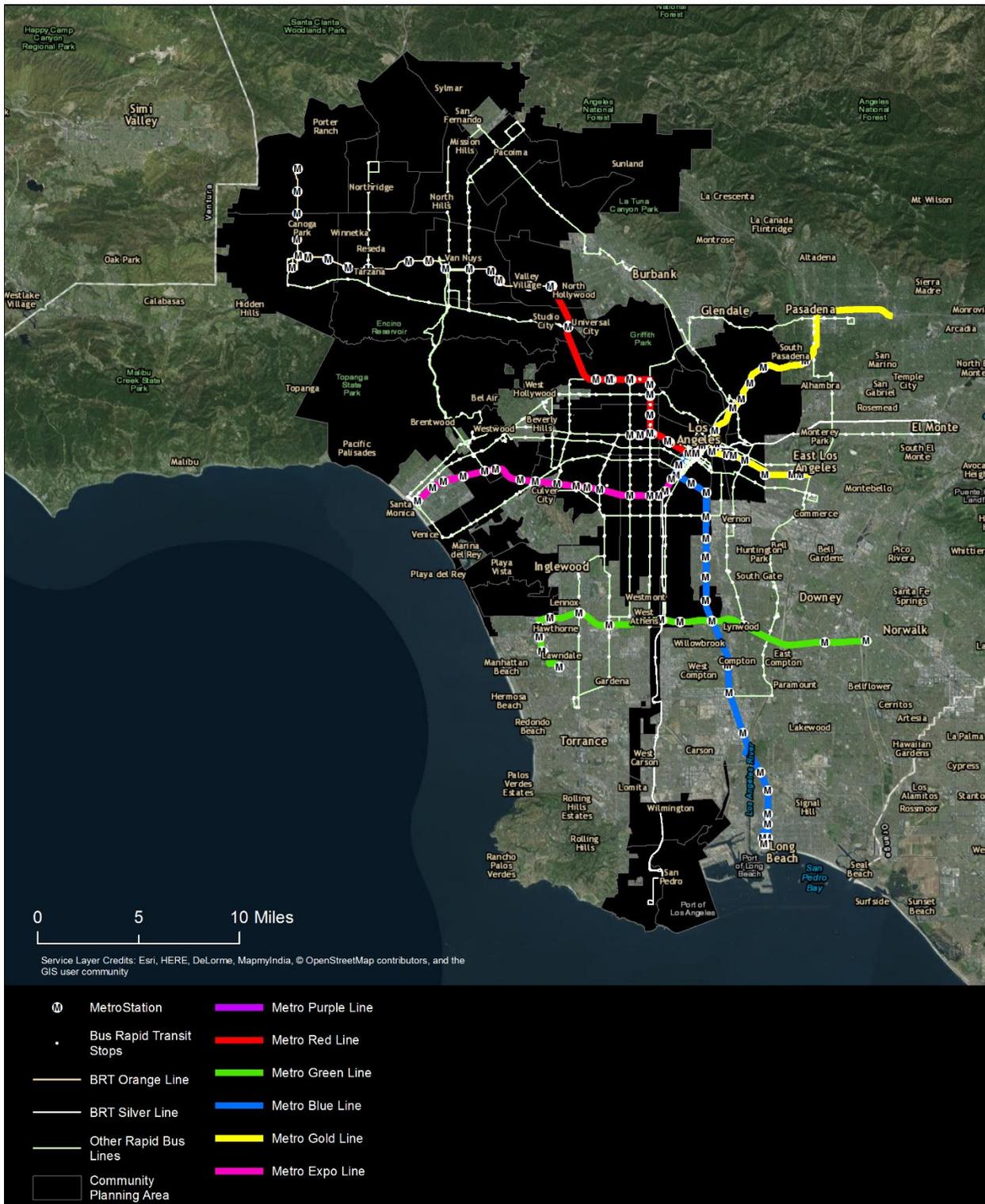
City of L.A. AFH: Healthcare Facilities



- Licensed Hospitals
- Department of Mental Health
- Community Health Services
- Department of Health Services
- Specialty Care Clinics
- Primary Care Clinics
- Freeways
- Community Planning Area

Map 13

City of Los Angeles: Transit Lines



Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or family status. Identify areas that experience an aggregate of poor access to opportunity in high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

In addition to the direct effects of environmental contaminants, place of residence appears to exert a broader influence on health outcomes. Although health and wellness are impacted by social, economic, environmental factors, and lifestyle choices, these issues are compounded by low educational attainment, which is closely related to place of residence.¹³⁵ The gaps in health outcomes between wealthier parts of the City, such as the Westside, and low-income areas in Downtown, South, and East LA consistently demonstrate disparities. Over 30% of children in Southeast LA and areas near the Port of LA are obese. Alternatively, less than 12% of children in wealthier areas of the city, such as Bel Air and Brentwood, are obese. Looking at Map 14, it is evident that there are higher concentrations of fast food restaurants in areas such as University Park in comparison to areas in Bel Air-Beverly Crest and Pacific Palisades. To compound the lack of access to healthy food, the same areas within the City that have higher concentrations of fast food restaurants also have fewer grocery stores. The same area of University Park with a high concentration of fast food restaurants also has between 0.45 to 0.68 grocery stores per 10,000 residents, as shown in Map 15. In addition to lack of access to healthy food options, even though a higher percentage of households within this area are CalFresh recipients, community planning areas in the South and Eastern part of the City also have a much higher share of liquor and/or alcohol related businesses compared to any other part of the City (Map 16). The same areas with poor health outcomes are also neighborhoods with higher exposure to environmental toxins (Map 7), extreme poverty (Map 17), and, within those neighborhoods, concentrations of racial and ethnic minorities (Map 18).

Even in the distribution of public amenities, such as parks and accessible green space, the southern part of the City and portions of the Valley with higher percentages of Black and Hispanic residents' lag in comparison to the rest of the City (Map 19). The availability of parks is linked to improved public health benefits, including increased physical activity, reduced obesity, and chronic diseases.¹³⁶ The Parks and Public Health report assesses park space per capita in relation to premature mortality from cardiovascular disease, diabetes, childhood obesity prevalence, community level economic hardship, and race/ethnicity. Areas within LA County that had less green space had higher rates of diabetes, obesity, and cardiovascular disease. In fact, areas with increased access to parks and green space were associated with better health outcomes and less overall economic hardship. As reported, Hispanic and Black residents were more likely to be residing in areas with less access to green space compared to Asian and White residents. Along with improved public health through increased physical activity and lower rates of obesity and diabetes, parks and public green spaces can also serve as important access points for engagement with residents to provide or enroll in health, social services, youth programs, and job fairs and other employment events. This is of particular importance in high poverty areas with R/ECAPs. In 2015, the LA County Department of Parks and Recreation collaborated with all communities within the county to gather data and input for

¹³⁵ City of Los Angeles Department of Planning. *Health Atlas for the City of Los Angeles*, June 2013. <http://planning.lacity.org/cwd/framwk/healthwellness/text/HealthAtlas.pdf>. Assessed August 2017.

¹³⁶ County of Los Angeles Public Health. *Parks and Public Health in Los Angeles County: A Cities and Communities Report*, http://publichealth.lacounty.gov/chronic/docs/Parks%20Report%202016-rev_051816.pdf. Assessed on October 2017.

future planning on parks and recreation.¹³⁷ The Assessment identified areas within the County that are in high need of parks, as displayed in Map 19, and areas within the Valley along Van Nuys and the southern and eastern portion of the City ranked as having a very high need for parks. The Parks and Public Health in LA County report revealed that as economic hardship increased in the City, park space per capita decreased. City Council Districts 5, 8, 9, 10, and 13 (which also have higher shares of ethnic minorities) had less than 1.0 acre of park space per 1,000 population.

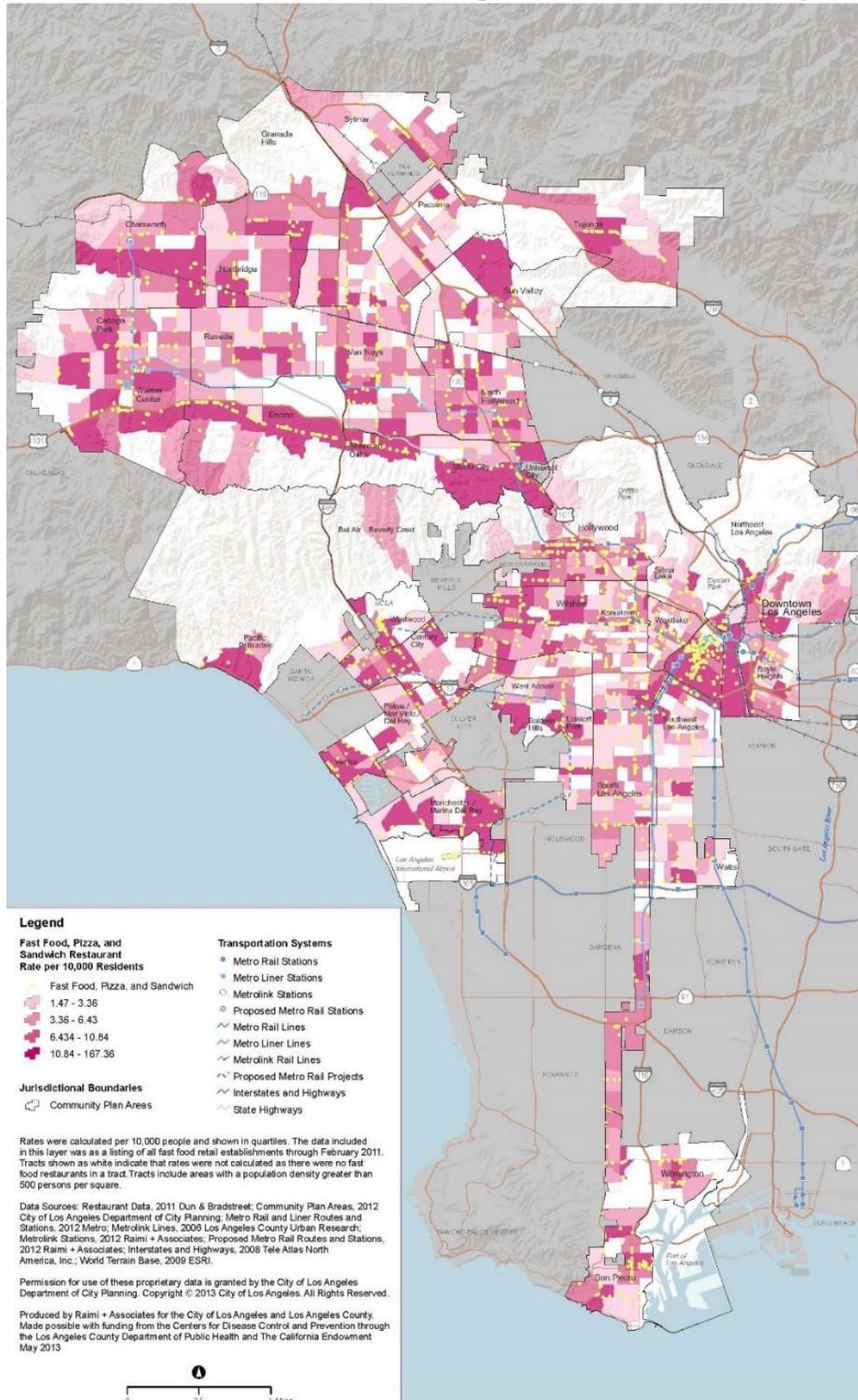
In 2014, the U.S. Army Corps of Engineers (USACE) approved a \$1-billion plan to restore habitat along the LA River, including wetlands, and add bike trails and walking paths along an 11-mile section north of downtown through Elysian Park. For the City, the 11 miles will function as a catalyst for revitalization efforts to restore all 51 miles of the LA River, stretching from the San Fernando Valley to Long Beach. Much of the LA River travels through City neighborhoods that have grappled with high poverty and lack of access to opportunity and community amenities for decades. As historically disinvested neighborhoods, particularly in Central and South LA, are infused with investment and revitalization plans, preservation of existing community assets and affordability becomes an acute issue. Previously disinvested neighborhoods that are experiencing environmental restoration and enhanced livability, and, as a result, new investments could exasperate economic pressures for low-income residents, who disproportionately are racial and ethnic minorities (Map 18). Riverside neighborhoods north of downtown, such as Elysian Valley, Elysian Park, and Cypress Park include large shares of Hispanic and Asian residents, and more than half of all households are renters and particularly vulnerable to displacement. As neighboring areas in Central LA, such as Downtown, experience an uptick in Ellis Act evictions, revitalization efforts focusing on ecology and waterways can propel displacement in adjacent neighborhoods (Map 20 and 21).

As displayed in Map 22, neighborhoods such as Elysian Valley and the eastern portion of Central LA have already seen demographic shifts within the USACE study area. A report prepared for the Urban Waters Federal Partnership, which is a consortium of federal, state, regional and county agencies, along with students in the Masters in Urban and Regional Planning program at University of California Los Angeles (UCLA) Luskin School of Public Affairs identified three criteria for corridors that are most vulnerable to displacement including: communities that have historically experienced disinvestment, neighborhoods in close proximity to an existing LA River access point and transportation, and areas that are in close proximity to proposed LA River park developments.¹³⁸ Examining Map 23, some of the most underserved areas with access to parks and open space along the LA River that also qualify under the three displacement criteria include Boyle Heights, Elysian Park, and Lincoln Heights. The LA River has primarily functioned as a flood control channel and has prevented residents from accessing the river. The River Path and adjacent parks are not accessible across multiple users, such as bikers, and physical barriers, such as bridges across the river, and an uneven patchwork of bicycle and walking path networks prevent residents from relying on the river as a true neighborhood amenity.

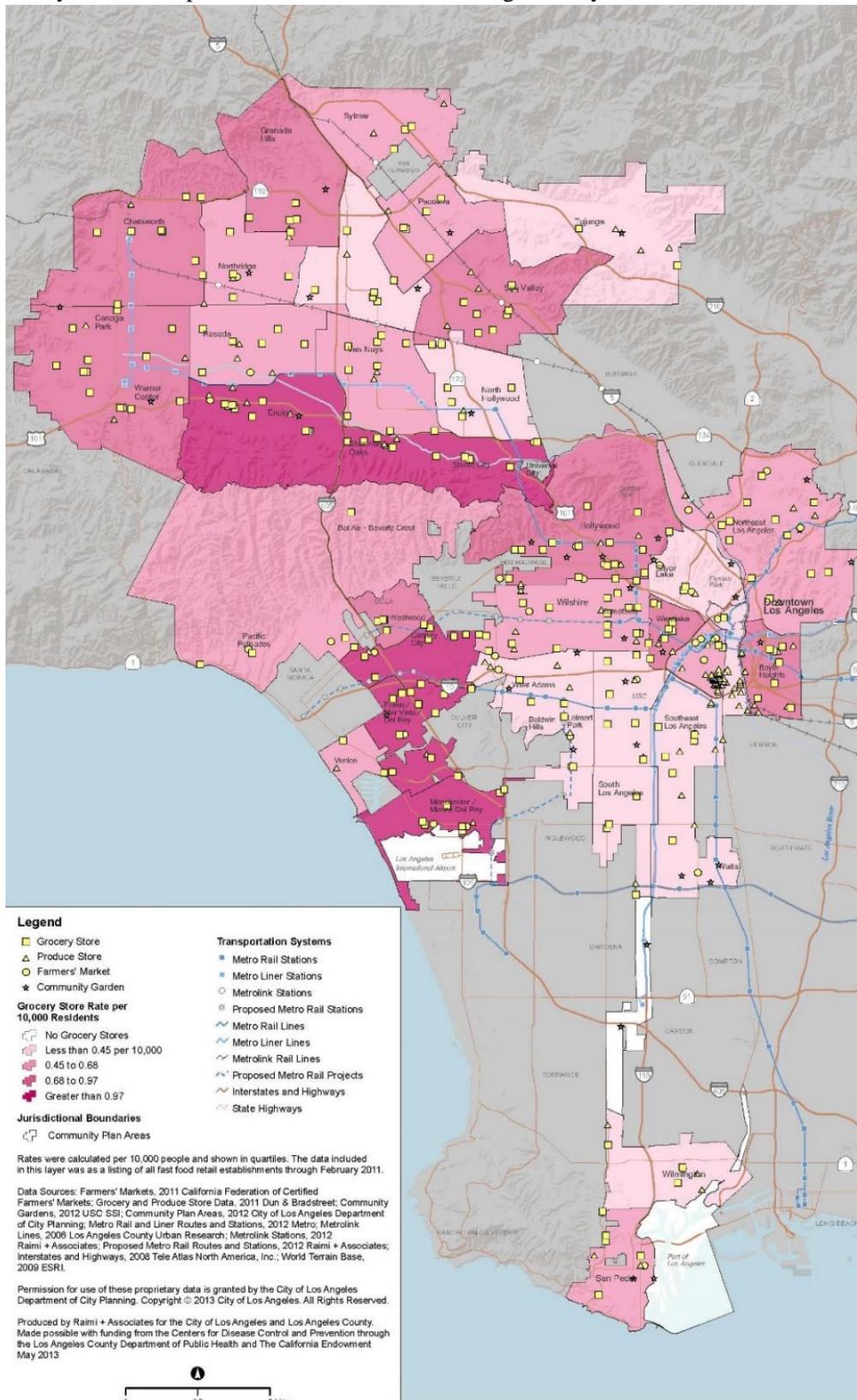
¹³⁷ County of Los Angeles Department of Parks and Recreation. *Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment*, <http://lacountyparkneeds.org/final-report/>. Assessed on October 2017.

¹³⁸ University of California Los Angeles. *Lower Los Angeles River Revitalization: An Inclusive Approach to Planning, Implementation, and Community Engagement*, 2017, http://innovation.luskin.ucla.edu/sites/default/files/2017%20Urban%20Planning%20Comprehensive%20Project%20-%20LA%20River_rev1%202.pdf. Assessed October 2017.

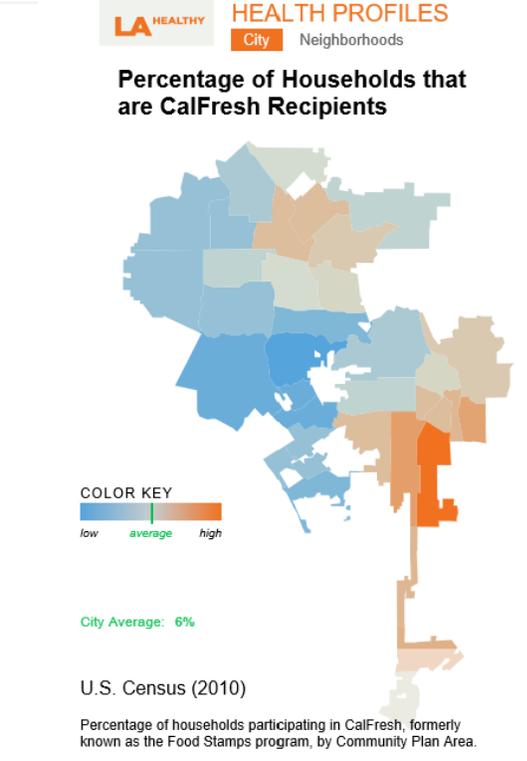
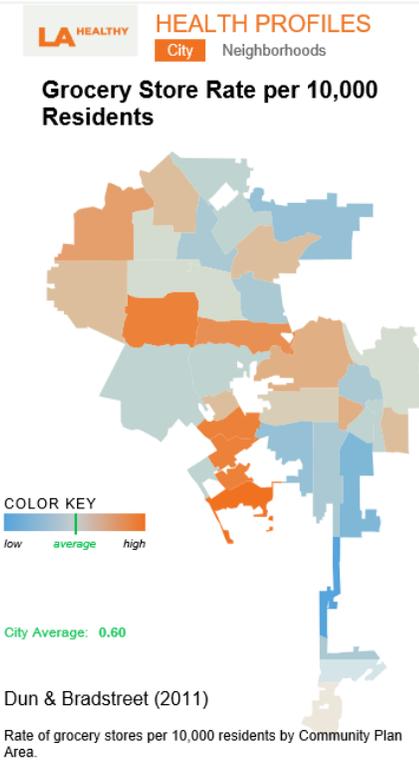
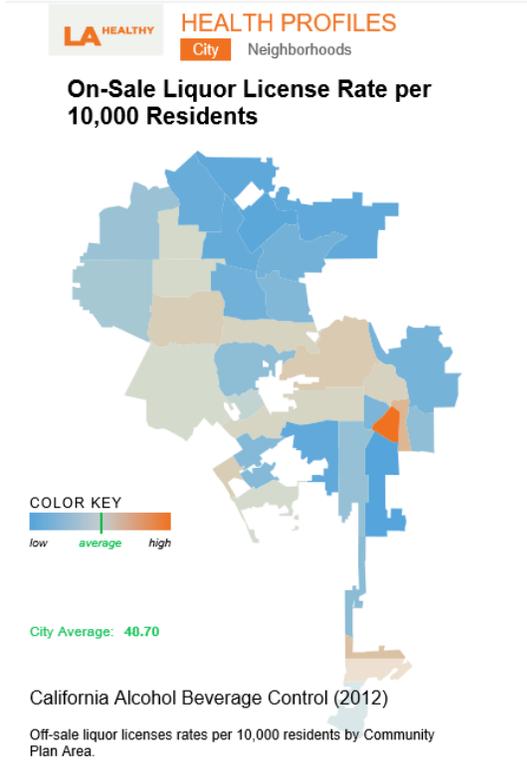
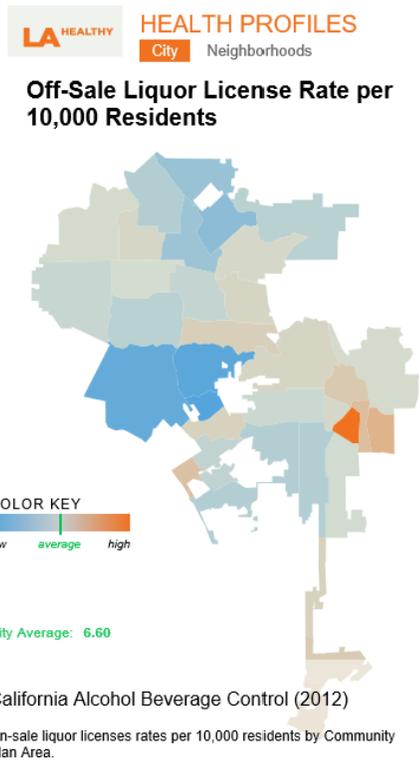
Map 14 Fast Food, Pizza, and Sandwich Restaurant Rate per 10,000 Residents in Los Angeles City



Map 15 Grocery Store Rate per 10,000 Residents in Los Angeles City



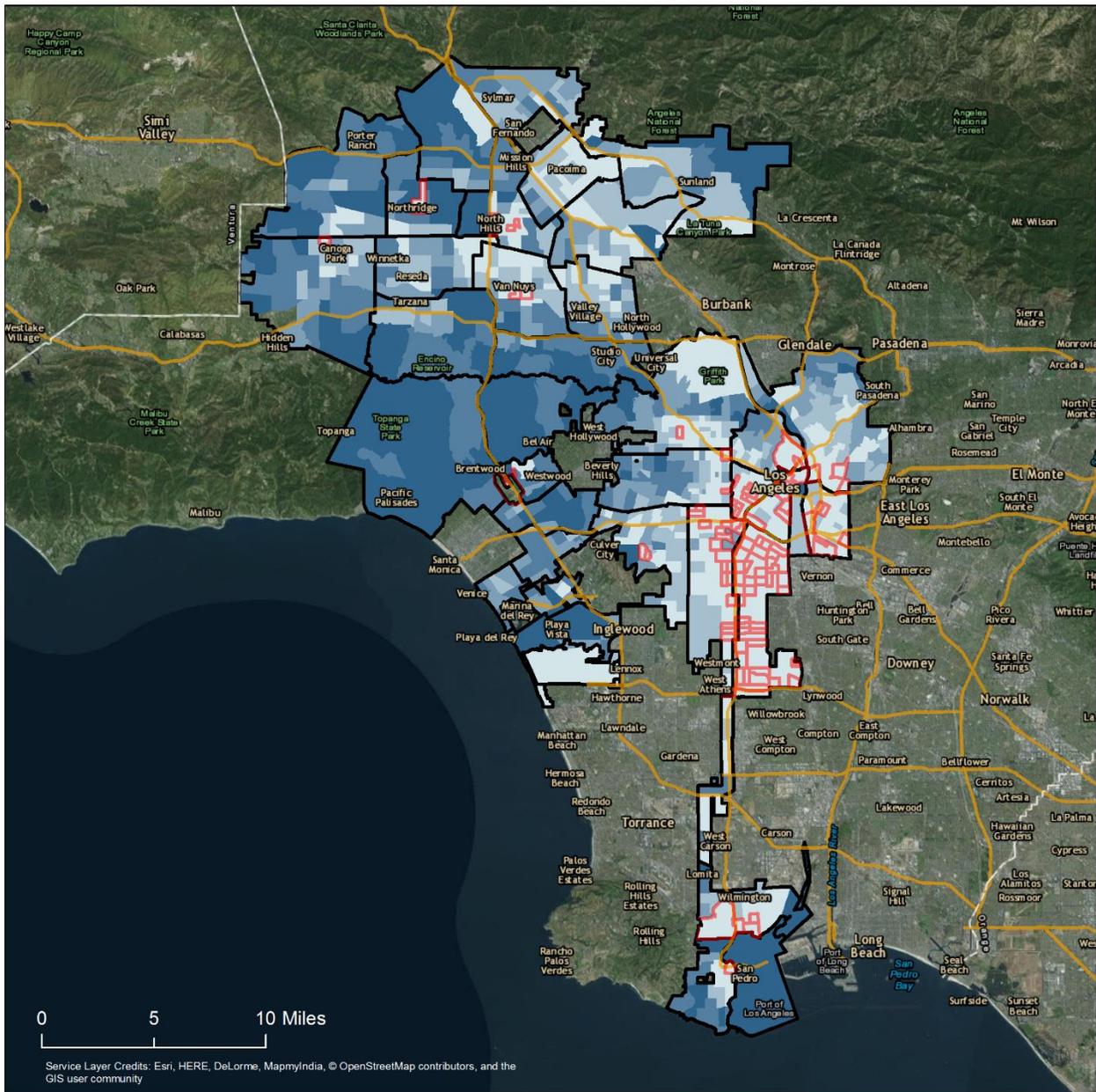
Map 16



Source: Los Angeles Department of City Planning and Los Angeles County Department of Public Health, Plan for a Health Los Angeles, Health Element, <http://healthyplan.la/the-plan/>. Assessed October 2017.

Map 17

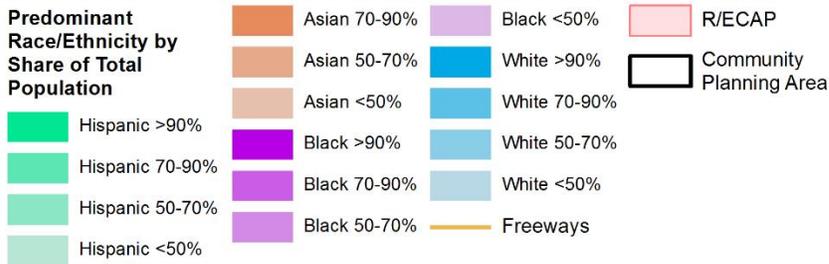
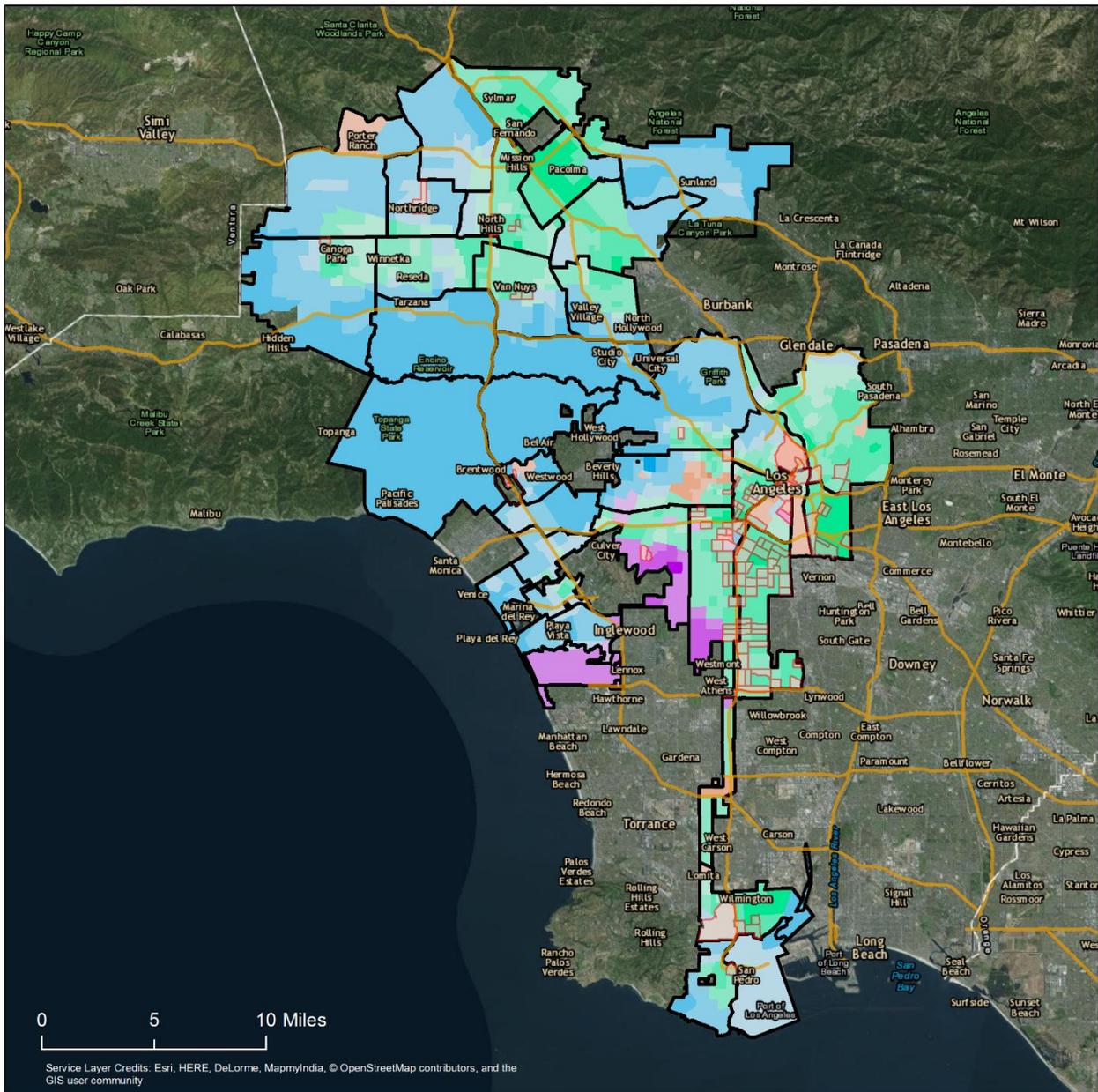
City of Los Angeles: Low Poverty Index



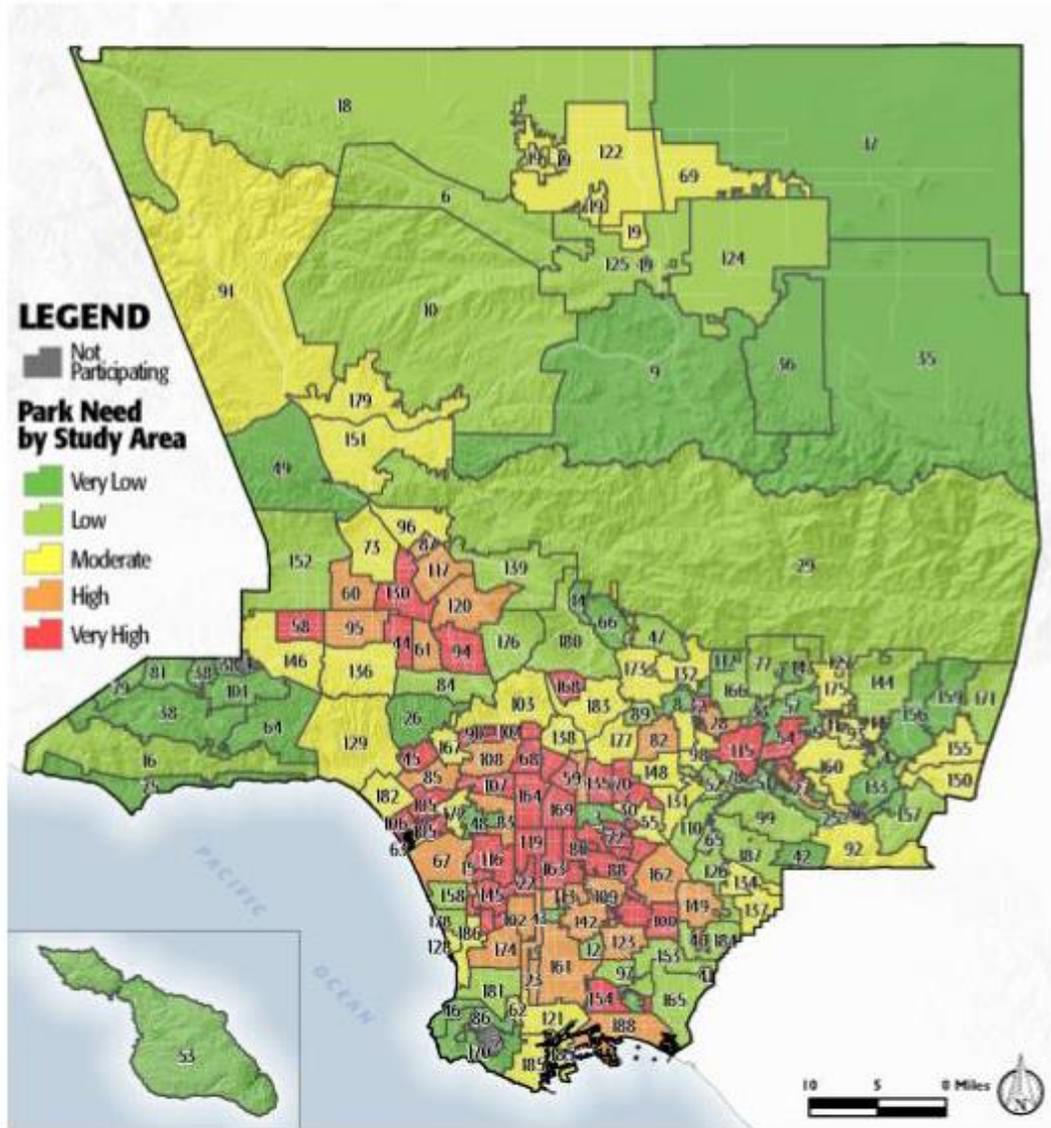
Low Poverty Index	Freeways
0 - 20	R/ECAP
21 - 40	Community Planning Area
41 - 60	
61 - 80	
81 - 100	

Map 18

City of Los Angeles: Predominant Race/Ethnicity, 2010



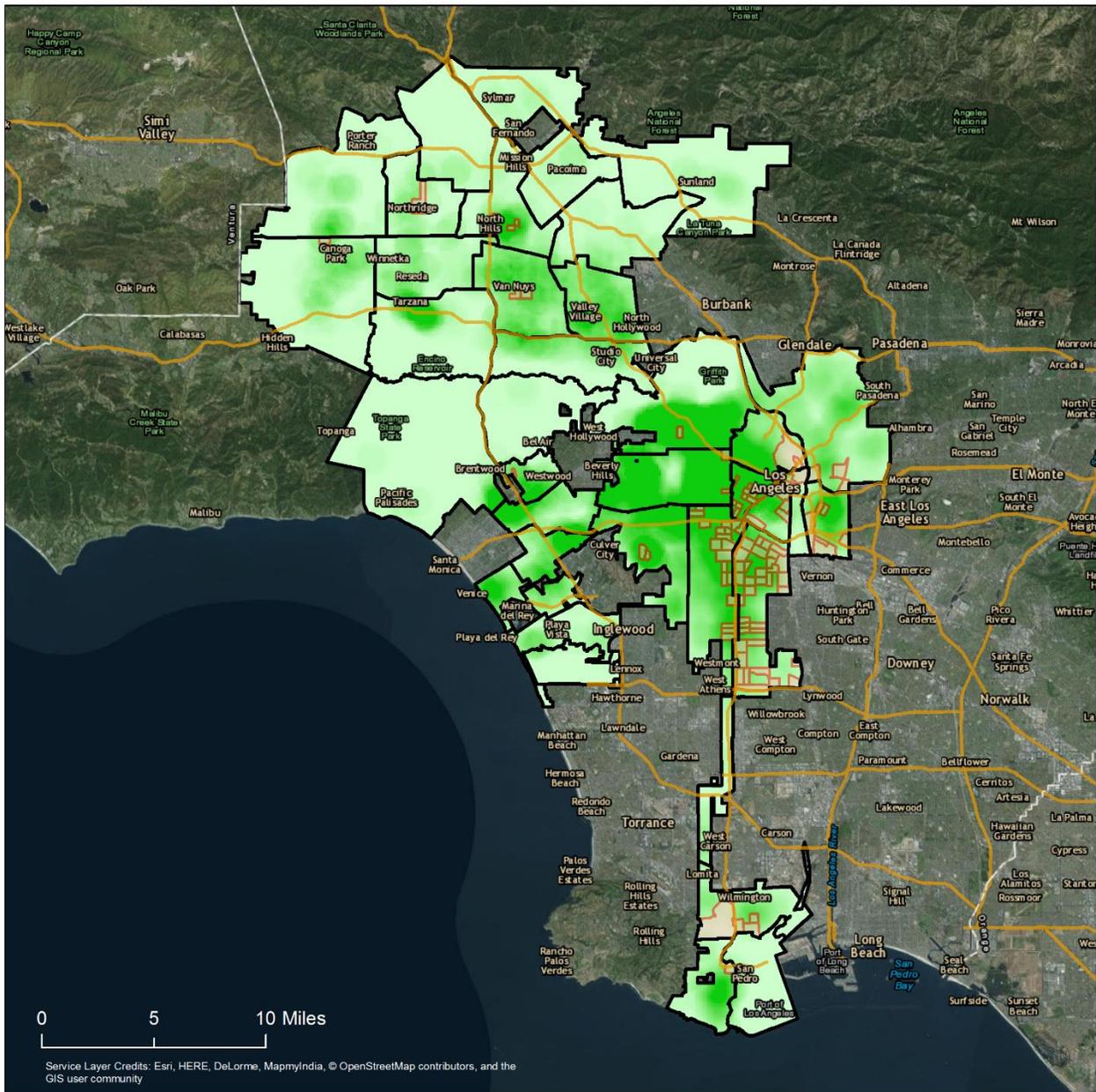
Map 19 Los Angeles County Park and Recreation Needs Assessment



Source: Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment

Map 20

City of L.A. AFH: Rent Stabilization Ordinance Properties



RSO Unit Density

- High
- Low

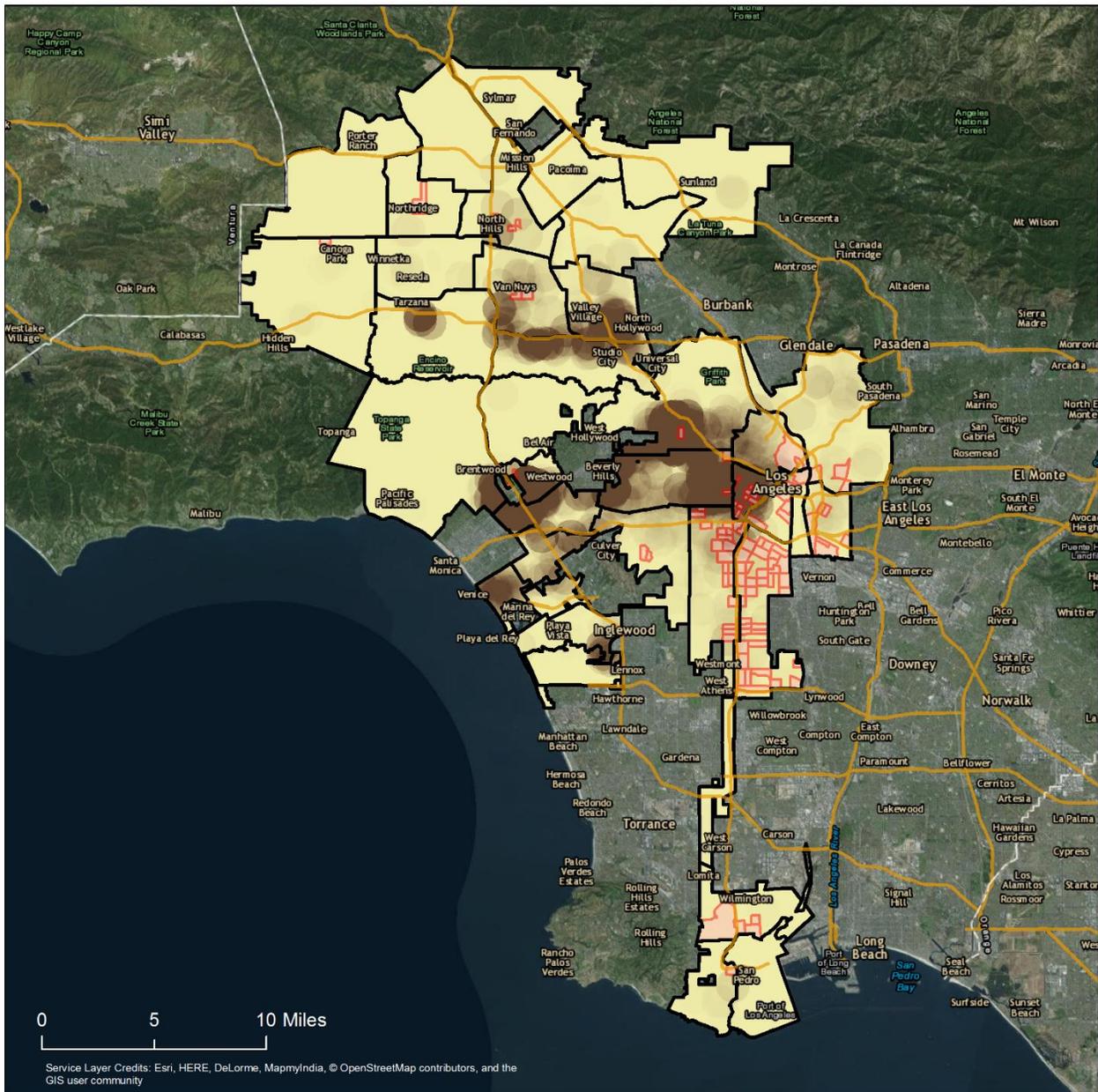
Community Planning Area

Freeways

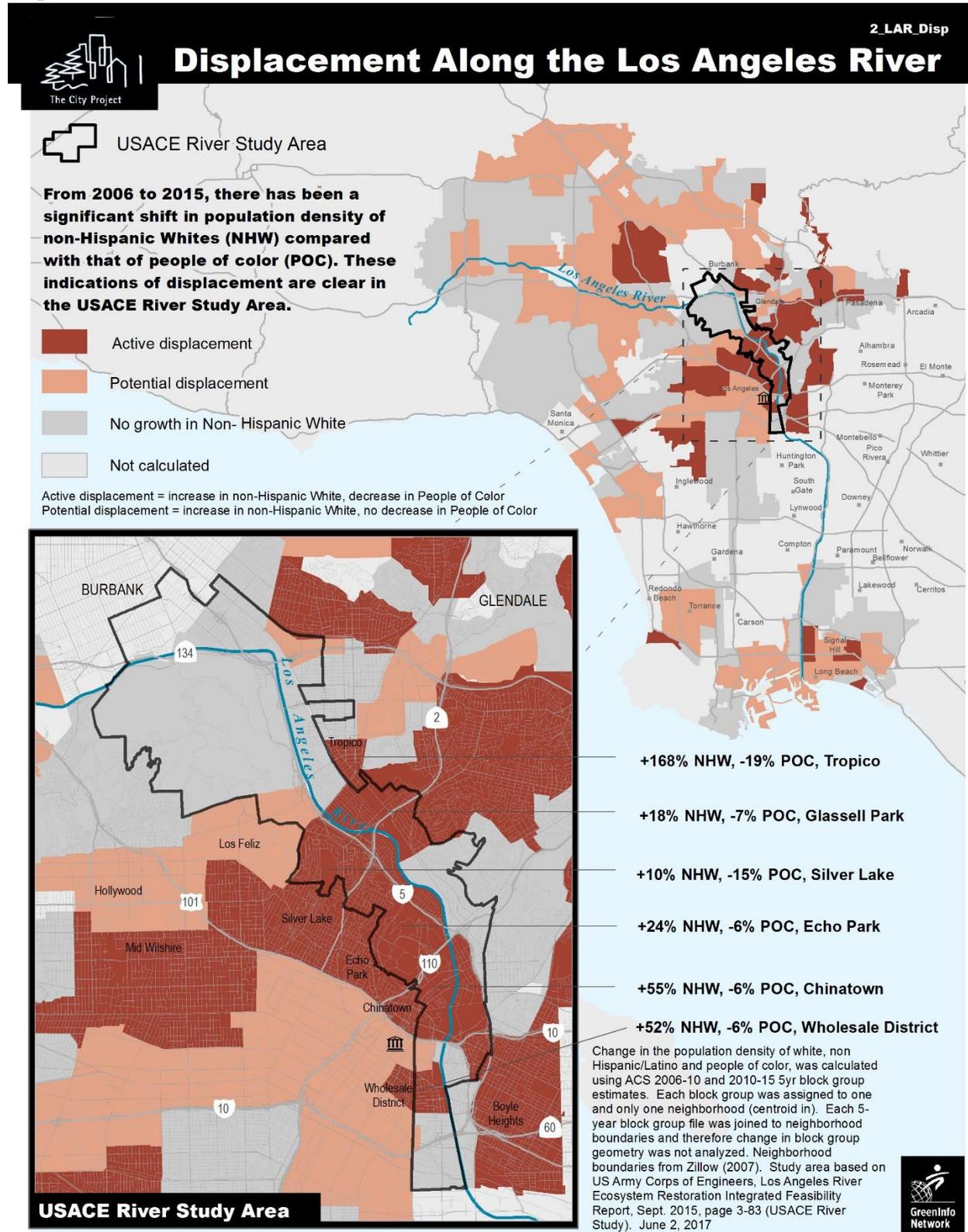
R/ECAP

Map 21

City of L.A. AFH: Ellis Eviction Data



Map 22



Map 23 Par Access for Children of Color Living in Poverty in Los Angeles City and County



f. Additional Information

Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

Crime has been increasing in Los Angeles and 2016 was the third year in a row to see increases in the incidents of violent and property crime. The Los Angeles Police Department (LAPD) is attributing the uptick in crime to gang activity and a growing homeless population, although, homeless individuals are more often victims of crime.¹³⁹ Even though crime has increased, the City has not reached historic levels of the 1980s and 1990s when nearly 1,100 people were killed in 1992.¹⁴⁰ Neighborhoods in West LA and the San Fernando Valley, areas that are traditionally considered to be safer, also saw increases in property related crime, such as robberies and car thefts. Since 2014 Woodland Hills, a neighborhood in West LA, saw a 24% increase in property crime. In 2016 the Topanga Division for the LAPD, which includes Woodland Hills, saw a 20% increase in violent crime. Overall in 2016 there were increases Citywide to violent crime and property crime, which was primarily fueled by car related thefts (Map 1). On average, in

¹³⁹ <http://www.latimes.com/local/lanow/la-me-crime-stats-20161227-story.html>

¹⁴⁰ <http://www.latimes.com/local/california/la-me-lapd-crime-increase-20160722-snap-story.html>

the last five years, South LA and East LA have experienced the highest levels of violent crime (Map 2). Areas of the City with concentration of R/ECAPs continue to be unsafe and disproportionately impact Hispanic and Black residents along with foreign-born residents. In 2016 the LAPD South Bureau, which also includes South LA along with San Pedro had a 6% increase in homicides and rapes, 10% increase in robberies, and 19% increase in aggravated assaults. Largely the City had a 15% increase in crime from 2015 and a 34% increase from 2014.

South LA, and to a greater degree, East LA, continue to grapple with high rates poverty impacted by unemployment, lack of proficient schools resulting in low educational attainment, and higher rates of homelessness, which all contribute to the prevalence of crime. A study conducted by the Federal Bureau of Justice Statistics using data from the National Crime Victimization Survey (NCVS) from 2008 to 2012 confirmed this trend. The study found that households living in poverty, at or below the Federal Poverty Level, had more than double the rate of violent victimization compared to higher income households.¹⁴¹ Furthermore higher levels of exposure to violent crime is also adversely correlated with the prospect of economic mobility, particularly generational mobility. The economic prospect for extremely low-income (0-30% area median income) and very low-income (31-50% area median income) children is significantly impacted when they grow up in areas with high rates of crime.¹⁴²

Along with higher incidents of crime, particularly violent crime, South LA also has higher rates of traffic related fatalities. Lack of safety due to crime or safe streets further exasperates negative health outcomes for many neighborhoods in South LA that have higher proportion of Hispanic and Black residents. In 2016 traffic deaths increased 40% from the previous year. At the start of 2017, 11 traffic deaths took place in South LA, which includes 16 of the 40 streets considered most dangerous by the Los Angeles Department of Transportation (LADOT) (Map 4). Nearly half of fatal collisions involved a person walking even though individuals walking or biking only account for 14% all collisions.¹⁴³ In fact a pedestrian is 16 times more likely to die in a collision than if they were in a vehicle. In LA traffic collisions are the leading cause of death for children between the ages of 5 through 14. Additionally, older adults are at risk and make up a much higher share of traffic deaths. Older adults are more likely to be killed while walking. Between 2009 to 2013 two-thirds of traffic collisions involved older adults who were walking.

Even though the rate of traffic collisions is high, majority of injuries and deaths occur primarily on 6% of LA streets. Corridors that have a high number of traffic collisions are designated as the High-Injury Network (HIN), which is mostly made up of arterial streets.¹⁴⁴ Arterial streets are wide, signaled streets that have higher volumes of traffic but also serve as commercial corridors to adjacent residential areas. As a result, many of the HIN corridors combine fast-moving vehicles with people on streets on foot or bicycle, making collisions more likely and fatal. Pedestrian collisions on arterial streets are seven times deadlier compared to collisions on non-arterial streets.¹⁴⁵ In addition nearly three times as many collisions occur at

¹⁴¹ Bureau of Justice Statistics, *Household Poverty and nonfatal Violent Victimization*, 2008-2012, November 2014, <https://www.bjs.gov/index.cfm?ty=pbdetail&iid=5137>.

¹⁴² ScienceDirect, *The effect of violent crime on economic mobility*, June 2017, <http://www.sciencedirect.com/science/article/pii/S009411901730058X>.

¹⁴³ Vision Zero, Vision Zero Los Angeles Action Plan 2015-2025, January 2017, <http://visionzero.lacity.org/wp-content/uploads/2017/04/VisionZeroActionPlan-2017.pdf>.

¹⁴⁴ Vision Zero, Vision Zero Los Angeles Action Plan 2015-2025, January 2017, <http://visionzero.lacity.org/wp-content/uploads/2017/04/VisionZeroActionPlan-2017.pdf>.

¹⁴⁵ Vision Zero, Vision Zero Los Angeles Action Plan 2015-2025, January 2017, <http://visionzero.lacity.org/wp-content/uploads/2017/04/VisionZeroActionPlan-2017.pdf>.

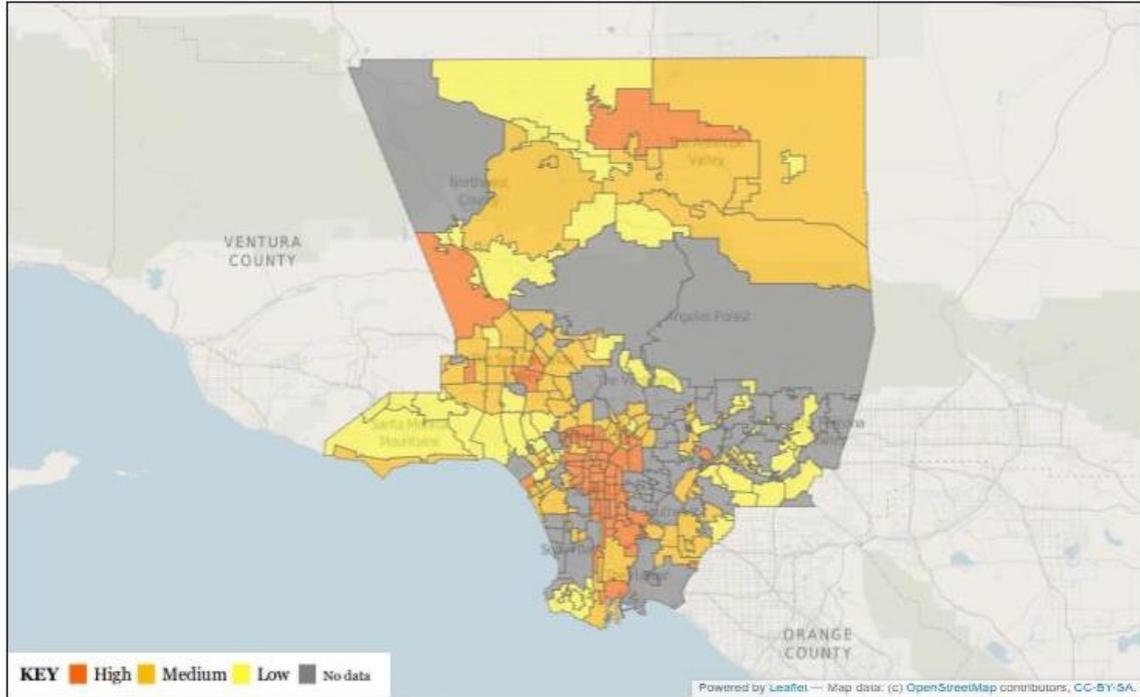
intersections than mid-roadway collisions. Half of the HIN encompasses neighborhoods that are already disproportionately impacted by lack of access to safe and healthy neighborhoods, incorporating much of Central LA, which includes Downtown, and South and East LA (Map 4).

Map 1 Rates of Violent Crime for the Los Angeles Region

MAPPING L.A. > CRIME

Violent Crime

Select one of L.A.'s 272 neighborhoods to see where it ranks



The rate of violent crimes per 10,000 people varies widely among the more than 200 neighborhoods and cities policed by the LAPD and L.A. County Sheriff's Department.

This map and list show the rates from Feb. 20, 2017 to Aug. 20, 2017, the most recent six months for which complete data is available for all areas patrolled by the departments.

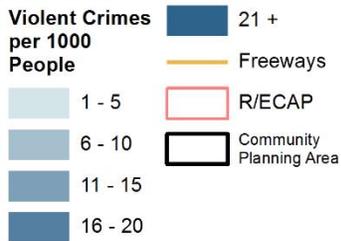
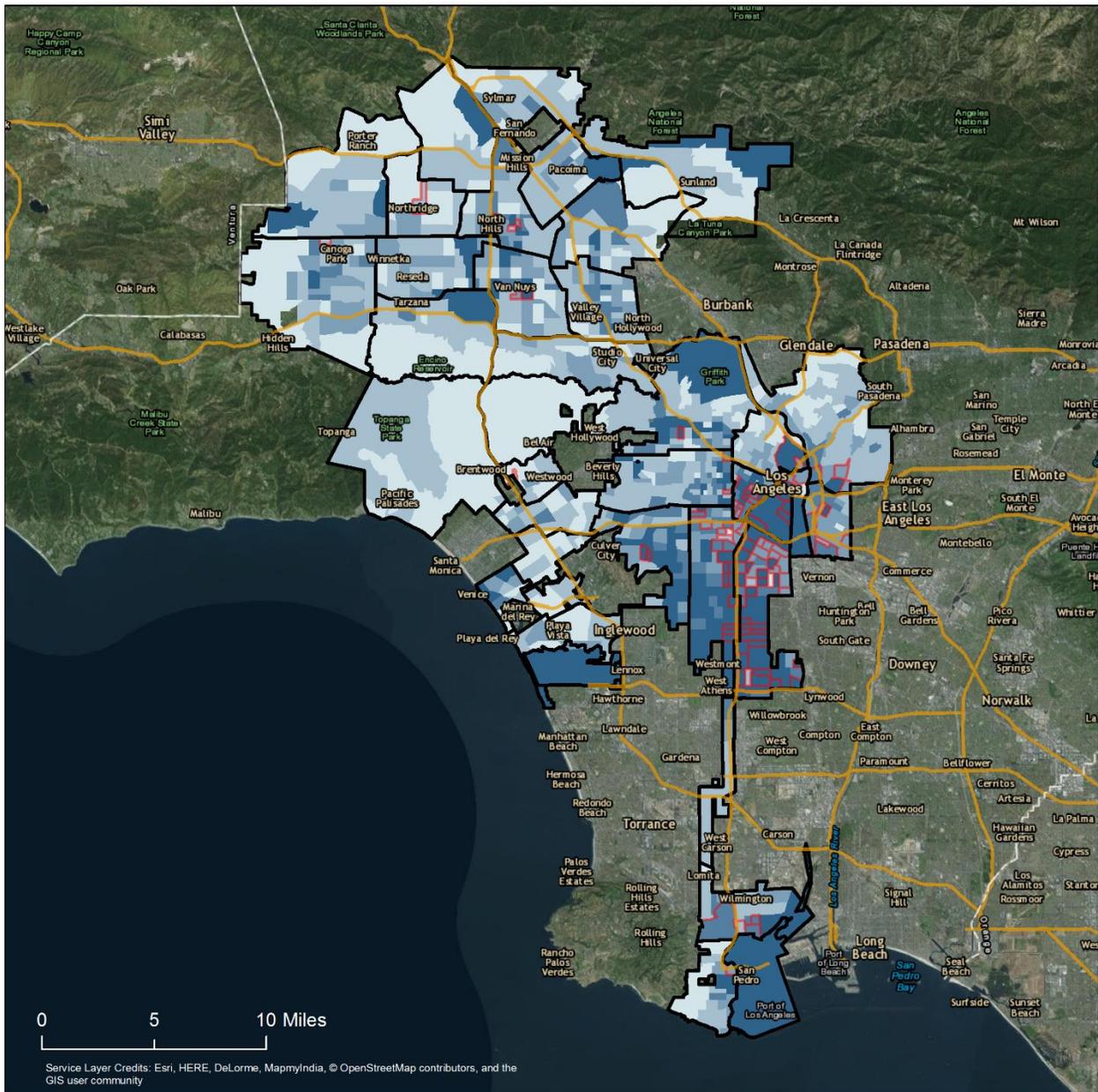
Violent crime is defined as homicide, rape, aggravated assault and robbery. Bear in mind that in areas with relatively low populations, a small number of crimes can generate a large per capita rate. For that reason, the chart below contains both per capita statistics and cross crime counts.

Mapping L.A. is the Los Angeles Times' resource for crime, neighborhoods, demographics and schools in Los Angeles County.

[About this project »](#)

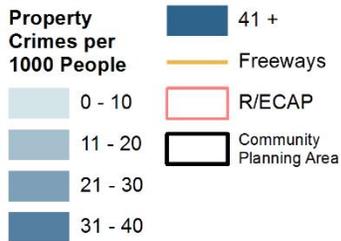
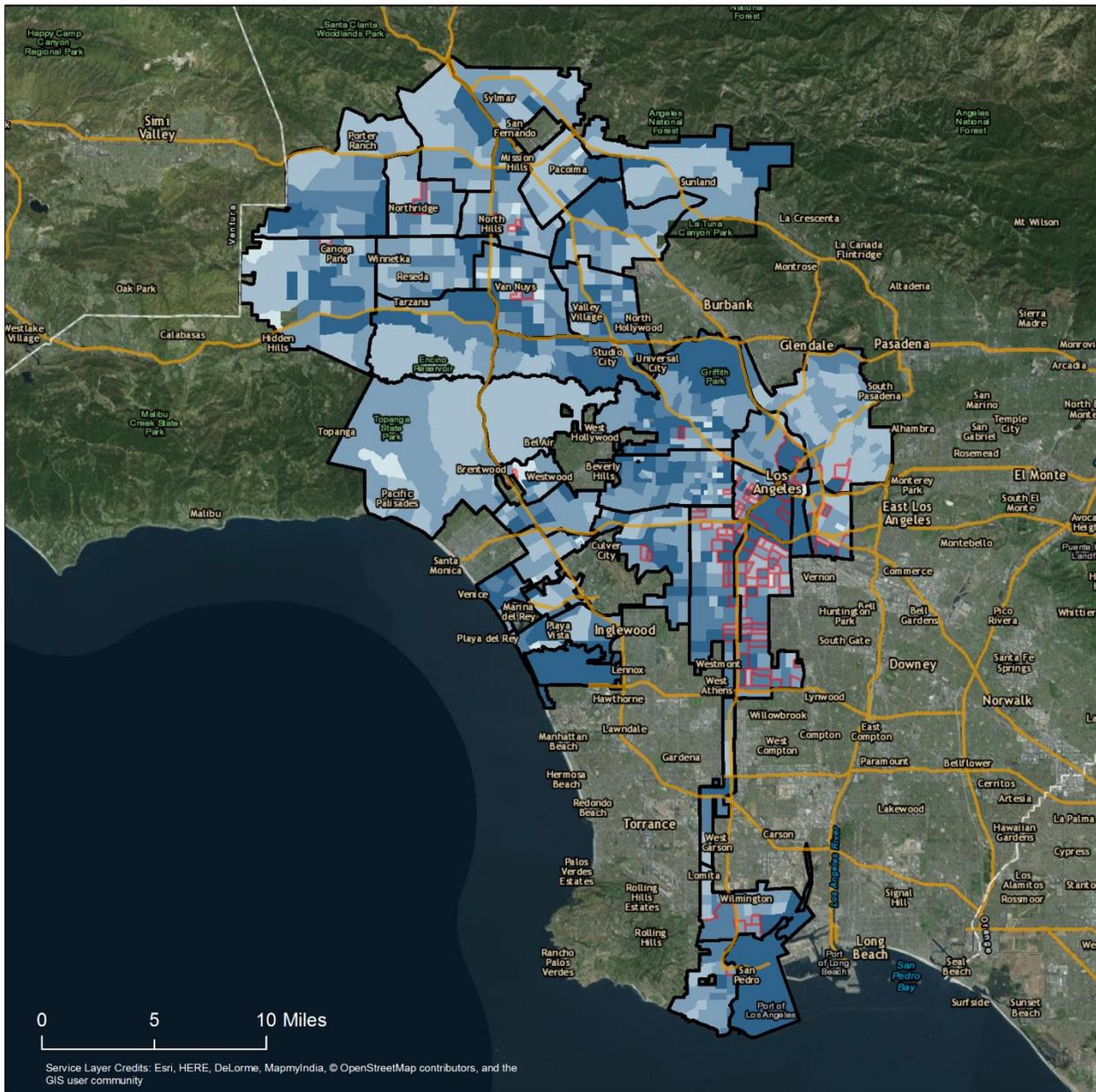
Map 2

City of Los Angeles: Annual Violent Crimes per 1000 People by Census Tract (5 Year Average)

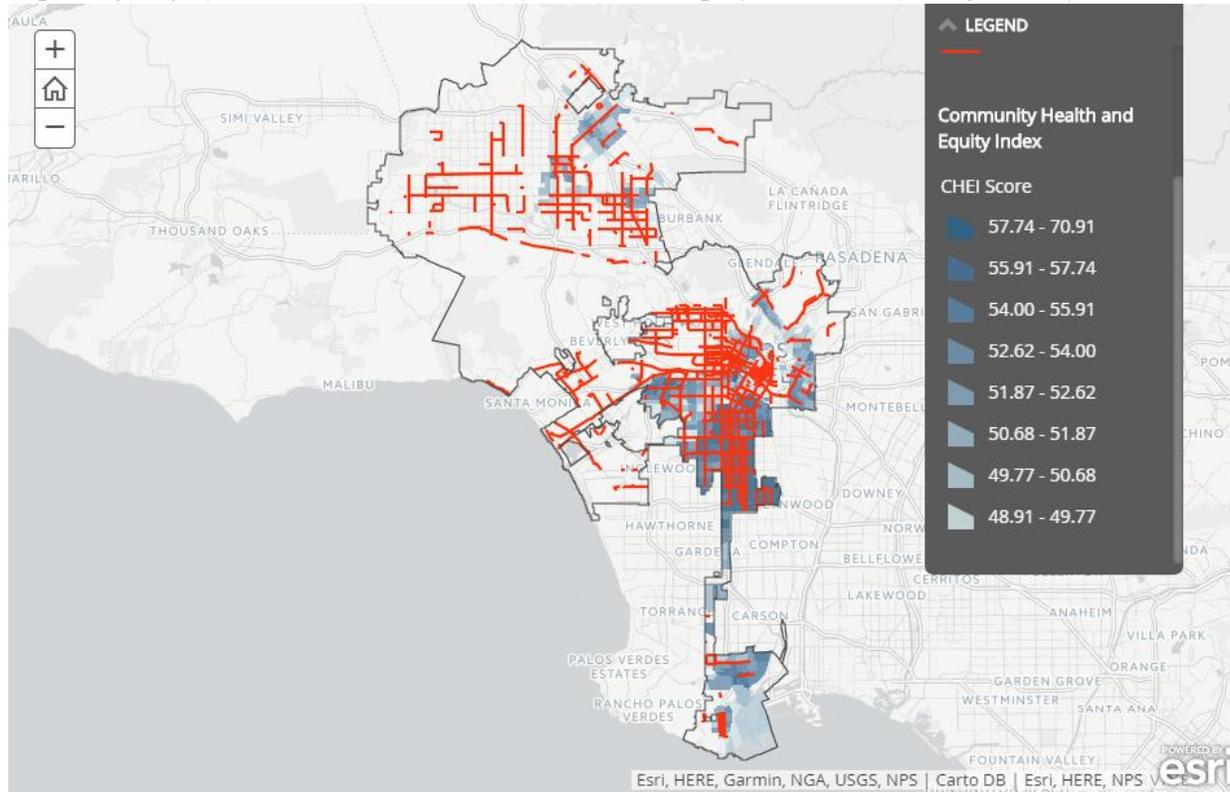


Map 3

City of Los Angeles: Annual Property Crimes per 1000 People by Census Tract (5 Year Average)



Map 4 High Injury Network with Community Health and Equity Index for Los Angeles City



Source: Los Angeles Department of Transportation, Vision Zero. High Injury Network with Community Health and Equity Index, Plan for Healthy Los Angeles

The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g. proficient schools, employment opportunities, and transportation).

LADOT has identified 40 priority corridors that the City will focus on for projects, policies, and programs aimed at decreasing traffic collisions. Speeding by drivers is the main contributor to traffic collisions and safety interventions will include projects that improve signal re-timing and road diets. By identifying thoroughfares with the highest numbers of fatalities LADOT can identify patterns of collisions that may emerge and narrow down intersections where speed is a factor. Additionally, LADOT is incorporating crash data to address causes of collisions, which will allow for tailored solutions. Site specific solutions will identify measures, such as highly visible crosswalks and protected bike lanes that can help prevent future collisions. Addressing speed involves a single point in an intersection but also along a stretch of roadway where high speed picks up. Additionally, the City is also pursuing changes at the State level targeting laws to improve traffic safety in LA. LADOT is lobbying the State to revise right-of-way that define jaywalking along with revising how cities enforce speed limits.

Under Mayor Garcetti, the City wants to reduce traffic fatalities by 20% by the end of 2017 and eliminate traffic deaths by 2025. Vision Zero is focused on raising awareness among residents and LADOT is partnering with the LAPD along with the Public Works Department and community organizations, including the Vision Zero Alliance. In 2016 LADOT hosted focus group meetings to discuss traffic

collisions using traffic death and injury data to solicit community input. Community events took place in various neighborhoods to educate residents about changes to streets. Public education initiatives have incorporated art and culture to engage residents about traffic safety. Through Vision Zero community engagement efforts in partnership with the LAPD provides local officers opportunities to interact with residents within South LA. Continuing to build relationships with residents and work cooperatively with community groups will be invaluable given the spike in crime in South LA. In response to an increase in crime the LAPD has implemented the Metropolitan Division, a specialized tactical unit, that moves away from the community policing tactic of relying on beat cops to patrol neighborhoods. Since the 1992 riots, the LAPD has worked to move away from military style weapons and tactics and focused more efforts on community policing strategies. However, with the recent increase in crime the LAPD is balancing efforts to fight crime in high-crime neighborhoods while maintaining relationships with the community. The LAPD has committed to creating a Community Relations Division, which will expand youth outreach through Girl Scout programs, sports, scholarships, and provide basic services like vision care health services. Additionally, the LAPD is utilizing crime data to develop a crime fighting strategy that targets hotspots. Maintaining community relationships will be critical to the LAPD's crime fighting efforts. As officers in the Metropolitan Division are deployed it will be critical that Metro officers build working relationships with local officers who have more familiarity with the neighborhoods and residents. Efforts to engage the community through Vision Zero provides officers with an opportunity to have discussions with community members on safety and consider holistically the impacts of lack of safety.

Majority of Hispanic and Black residents reside in neighborhoods in LA that are racially and economically segregated. Past government programs, policies, and funding have negatively impacted areas such as Central, South, East LA, which incorporate census tracts with high rates of poverty and poor access to opportunities. Proximity to proficient schools, jobs, police protection, banks, grocery stores, parks and hospitals are interlocked with residency patterns in the City, which are disproportionately linked to race, ethnicity, and national origin. Patterns of segregation and R/ECAPs have produced structural hurdles for racial and ethnic minority groups. Such access issues are severe and make it nearly impossible for individuals to escape from generation to generation. Recognizing the impact of lack of investment in many neighborhoods in South LA, City departments including, Planning, Parks and Recreation, Public Works, Transportation, Police, and Homeless Services, are coordinating efforts and partnering to tackle barriers in place that prevent many of the most vulnerable residents from accessing important opportunities to improve their quality of life. As the City explores pathways to improve access to community amenities in neighborhoods that have experienced decades of private and public disinvestments, policies and practices that have perpetuated segregation, and concentrated poverty due to the disproportionate siting of affordable housing in low-income minority neighborhoods primarily in Central, South, and East LA; cross department collaborations can be leveraged in efforts aimed at increasing access to opportunity, including developing methods to share data across departments. Breaking down data silos will allow for better integration of policies across City departments and the ability to assess impacts of programs and policies on improving quality of life for residents. Data on service delivery and resident outcomes, workflows and performance tracking systems for various service delivery methods will be valuable in evaluating effectiveness of initiatives aimed at improving access. Furthermore, many City departments are incorporating community engagement initiatives to solicit resident feedback to better understand community needs. These initiatives, although focus on topics outside of the purview of housing, are nonetheless important indicators of access and overall quality of life.

Contributing Factors to Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

Location and type of affordable housing

The location and type of affordable housing is a contributing factor to disparities in access to proficient schools, environmentally healthy neighborhoods, and low poverty neighborhoods in Los Angeles. As discussed elsewhere in this AFH, widespread single-family zoning and community opposition prevent affordable multifamily housing from being built in many parts of the City thus contributing to segregation by race and income. In addition, the location of affordable housing helps to perpetuate racial segregation. Among LA County housing submarkets, average rents are lowest in South LA and Koreatown-Mid City, areas with large populations of color, and are highest in the largely White Westside.

Maps from the HUD Data and Mapping Tool indicate that all forms of publicly supported housing including Low-Income Housing Tax Credit properties, Project-Based Section 8 properties, Public Housing units, and Other Multifamily units are more concentrated in less affluent communities in South LA, East LA, Central LA, and portions of the San Fernando Valley. Relatively little affordable housing is located on the Westside. The occupants of publicly supported housing are disproportionately members of protected classes. The siting of publicly supported housing can limit fair housing choice and contribute to disparities in access to opportunity when key amenities that enhance quality of life are at a geographically removed from affordable housing.

Lack of access to opportunity due to high housing costs

Lack of access to opportunity due to high housing costs is a significant contributing factor to disparities in access to opportunity. The lack of a mandatory inclusionary requirement in all new developments foregoes an opportunity to provide lower income residents with opportunities to live in higher opportunity areas. Additionally, the Low Income Housing Tax Credit (LIHTC) project siting practices between 2003 and 2015 have constructed few units in higher opportunity areas (See Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs).

According to *The Affordable Housing Crisis in Los Angeles: An Employer Perspective (Crisis)*, the high cost of housing limits where lower paid members of the workforce can afford housing and has led large percentages of employees to endure long commutes. The Crisis also recommends the City actively engage with the planning process to make sure that development around transit includes housing at all price points. The City has created new incentives for Transit Oriented Development. Some are a result of new legislation, such as AB 744 (2015) that created Transit Priority Areas (TPAs) which reduced parking requirements within large transit nodes in the City for new development. Further, SB 743 (2013) and SB 375 (2011) created certain environmental review exceptions to streamline the project process resulting in lowering development costs and incentivizing affordable housing transit-oriented development.

In addition to supporting state-wide legislation to amend the definition of "source of income" to include Housing Choice Vouchers, the City should consider an ordinance to prohibit Housing Choice Voucher discrimination in Los Angeles, as well as an administrative and legal enforcement mechanism.

Discrimination against Housing Choice Voucher holders denies those holders opportunities to reside in higher opportunity areas.

High costs can have a greater effect on families with children who need multiple bedrooms and individuals with disabilities who need accessible housing or housing located close to accessible transportation.

Lack of public investments in specific neighborhoods, including services or amenities

A lack of public investments is a significant contributing factor to disparities access to proficient schools in the City of Los Angeles and the broader region. The distribution of low-performing schools also roughly coincides with the geographic spread of R/ECAPs. According to a report by the California Office to Reform Education, at least two of the five worst-performing high schools were located in R/ECAPs: David Starr Jordan Senior High in Watts and Dr. Maya Angelou Community High in South Park.

Lack of private investments in specific neighborhoods

A lack of private investments is a significant contributing factor to disparities in access to employment in the City of Los Angeles and the broader region. Specific neighborhoods with low-income, high minority populations have the greatest need for private investments to construct affordable housing, invest in new small businesses, and increase access to community amenities, such as supermarkets and banks. When assessing the various metrics that reflect lack of private investment in specific neighborhoods, it is indisputable that predominantly low-income, high minority communities suffer the greatest consequences and are often left without an opportunity for economic mobility. Generally, the distribution of community problems such as the lack of adequate housing, the lack of investments in small businesses, and the lack of access to community amenities, impedes economic mobility for low-income people of color and prevents them from accessing high opportunity areas, thus perpetuating segregation.

One indicator of the level private investment in specific neighborhoods is the issuance of building permits for new construction. Since January 2013, the LA Department of Building and Safety has issued 14,874 building permits for new construction, including 1,240 for commercial properties, 1,036 for apartment buildings with three or more units, and 12,598 for one or two-family dwellings. The combined 2,276 permits for commercial properties and apartments are a useful proximity for private investment trends. The permitted properties are located in 113 zip codes, but nearly half of the properties (1,120) are located in just 24 zip codes that have had 30 or more such building permits. Of those 24 zip codes, none are located in East LA and just one (90011) is located in South LA. Neighborhoods in these sections of the City continue to experience the harmful effects of disinvestment. The problem of lack of private investment, however, is not consistent across all low-income communities of color in LA. Neighborhoods like Chinatown, Koreatown, the Westlake District, and Pico-Union are the site of significant private investment.

A second metric is economic development that creates jobs and increases access to amenities such as supermarkets, pharmacies, and banks. R/ECAP neighborhoods in South Los Angeles, such as Watts have limited access to supermarkets, most of which are several miles away and only accessible with personal transportation.

The distribution of grocery stores, provides another lens through which to evaluate the effect of a lack of private investment in specific neighborhoods. Residents who live in neighborhoods located in South LA are disproportionately subjected to limited supermarket access. These populations overwhelmingly include high percentages of low income Hispanic and Black residents. According to a report by researchers at Johns

Hopkins University, "mostly [B]lack neighborhoods present 'a double disadvantage' in supermarket access." In fact, the study showed that Black neighborhoods with little poverty had fewer supermarkets, on average, than high-poverty white areas.² Due to their race and level of poverty, specific neighborhoods with large Black populations lack opportunities for healthy food options and decent wage paying jobs. As an urban sociologist at American University put it, "the systematic refusal of corporations and small businesses to invest more generally in some largely African American and Latino neighborhoods robs those communities of the employment and education opportunities, that, over time, encourage healthier eating and living." As a result, a lack of private investment in the form of access to supermarkets and healthy food chains, contribute to the perpetuation of segregated neighborhoods.

Additionally, access to banks is severely limited in R/ECAP neighborhoods, furthering the lack of opportunities to secure funding from global financial institutions that could have impactful results within R/ECAP neighborhoods. South Los Angeles is home to 16 banks, one of which being JPMorgan Chase. On January 23, 2014, JPMorgan Chase announced a \$7 million-dollar grant to four leading Community Development Financial Institutions (CDFIs). The grant is part of the foundation's new CDFI Collaboratives program, a \$33 million commitment to help CDFIs and small business lenders build capacity and to jumpstart job creation in low- and moderate-income communities in the Chase footprint. Neither South Los Angeles nor the City of Los Angeles was included in this important economic initiative, whereas Los Angeles County is home to 287 JPMorgan Chase Branches with \$27 billion dollars in deposit. The South Los Angeles study area has 4 branches with a total deposit base of \$201,507,000.00 according to the FDIC Summary of Deposits Report for the period ending June 30, 2013. When leading global financial institutions choose to privately invest into specific low-income communities such as South Los Angeles, positive economic and social results can be seen. Without private investment into the community, neighborhoods like Watts are left without access to traditional and largely affordable capital, and new businesses cannot finance their growth or daily operations in a cost-effective manner. Thus, high minority populations are left in overwhelmingly segregated neighborhoods without opportunities for any upward economic mobility.

Overall, the City has set ambitious affordable housing development (permitting 100,000 new housing units by 2021) and preservation (at least 15,000 affordable units for low-income households by 2021) goals. However, between 2010 and 2015, the population increased at a rate of 3.5%, household income grew at a modest rate of 2.17%, the percentage of people living in poverty increased by 17.5% while median rent increased by 12.26%. Even if the City's development and preservation goals are realized, there is still a growing deficit.

As part of the process for updating Community Plans for South and Southeast LA, the City is creating incentives for private investments that provide amenities that are desired by community members. This proactive strategy could ameliorate the existing lack of private investment.

Community opposition

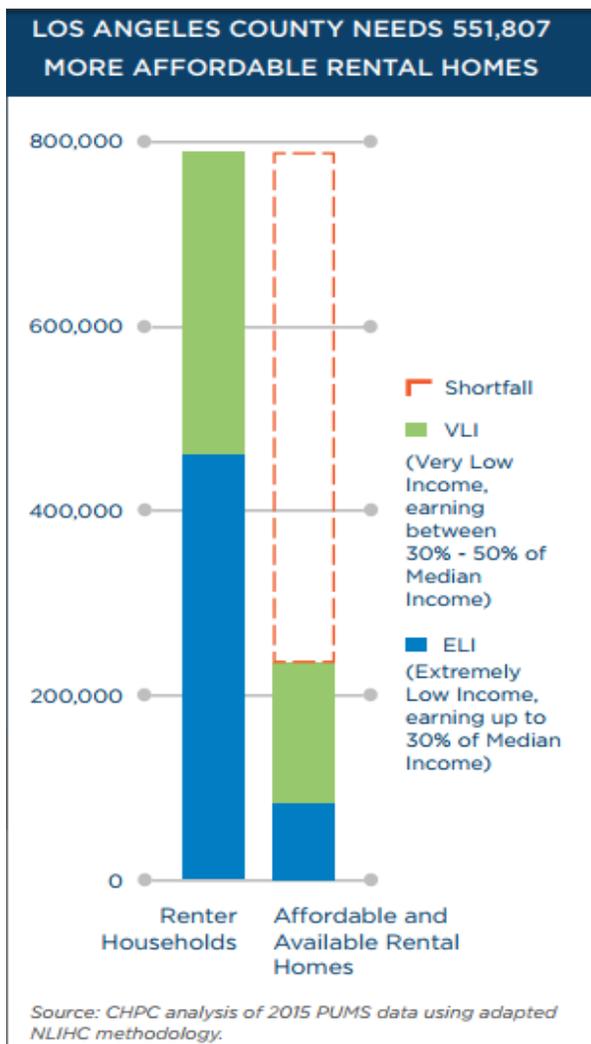
Community opposition is a significant contributing factor to disparities in access to proficient schools, environmentally healthy neighborhoods, and low poverty neighborhoods in the City of Los Angeles and the broader region. In recent years, community opposition has played a role in hindering the development of high-density or affordable housing, both of which are disproportionately occupied by people of color and lower-income households. Salient examples of Not-in-My-Back-Yard (NIMBY) activism include community opposition against a new zoning plan for Hollywood that would have allowed for the construction of buildings with greater density and height, especially around transit areas. Much of the

development that community opponents have opposed, however, has lacked a substantial affordable component.

In San Pedro, a neighborhood with a disproportionately high non-Hispanic White population, a proposal for a 1,900-unit development on former naval housing land with affordable units for moderate-income households faced significant community opposition. In its approved form, it will comprise only 676 units, with nearly a third of the units designated as single-family homes. It is difficult to track the relocation of affordable housing developments originally slated to be built in higher-opportunity neighborhoods. However, researchers have noted that community opposition against inclusive housing can both exacerbate and create new R/ECAPs.

In a December 2016 study issued by the University of California Center Sacramento, the author noted that community opposition is a significant policy issue because “not building housing in some parts of the City pushes the pressure for development, along with any negative impacts, to neighborhoods with fewer resources to resist.” The tide may finally be turning. Measure S, a ballot initiative not supported by the City that would have placed a two-year moratorium on developments requiring zoning changes that increase building density or height was soundly defeated at the polls. Had it been passed, it would have become more difficult for affordable housing developers to build in typically higher-opportunity, lower-density neighborhoods.

Loss of Affordable Housing



The deficit of affordable housing units contributes to disparities in access to proficient schools, low poverty neighborhoods, employment, and transportation. Within the City of Los Angeles, the areas with the greatest housing burdens are in the San Fernando Valley, the Eastside, and South LA, in neighborhoods like Boyle Heights and South Central. These areas have higher minority populations, are more segregated, and have higher concentrations of R/ECAPs. In general, the City's segregated, heavily Non-Hispanic White areas have relatively low levels of housing burden. Also, although Asian and Pacific Islander residents have a relatively low rent burden overall, Koreatown, Chinatown, and Little Tokyo all have concentrations of foreign-born residents in areas of high housing burden.

Expiring affordability restrictions and covenants also lead to the loss of affordable housing in a manner that contributes to segregation because landlords are typically more likely to choose not to renew subsidy contracts when their properties are either located in high opportunity areas or rapidly gentrifying ones that are near job and transit centers.

As part of Measure JJJ's community plan requirement, the plan must ensure that there is no loss of affordable housing units through transit-oriented development investments. The implementation of this planning

requirement will be important to efforts to reduce the loss of affordable housing.

Displacement of residents' due to economic pressures

Displacement of residents' due to economic pressures, is a significant contributing factor if not the largest contributing factor, to disproportionate housing needs in the City of Los Angeles and the broader region. Over the last decade, the City has faced a serious affordable housing crisis that was, in part, caused by decades of insufficient housing production, particularly in predominantly non-Hispanic White, high opportunity areas, coupled with growing gentrification in more diverse neighborhoods.¹⁴⁶ Mayor Garcetti has made housing production and affordability a key part of his "pLAn" for the City, including developing 100,000 new housing units as well as preserving and building 15,000 affordable units by 2021. However,¹⁴⁷ some observers believe that the 100,000 planned units may not be enough to meet the demand and slow rent increases. Also, many landlords offer affordable units only because they are obligated to under the contracts

¹⁴⁶ Abundant Housing LA, *Don't Call It a Boom: Despite Uptick, LA Still Adding New Housing Act a Snail's Pace*, January 2017, <http://www.abundanthousingla.org/2017/01/03/dont-call-it-a-boom-la-housing-growth/>.

¹⁴⁷ City of Los Angeles, The pLAn, <http://plan.lamayor.org/portfolio/housing-and-development/>.

they sign with the City when new projects are being developed. When those contracts expire, landlords are able to turn affordable units into more profitable, market-rate housing. As a result, the worst-case scenario is that as many as 15,000 affordable units will be converted to market rate by 2021, although it is expected that a significant percentage of these units will receive annual renewals.¹⁴⁸

Also, unless additional steps are taken to mitigate the effects of development on low-income renters of color, the City's development strategy could have unintended consequences. For example, a disproportionate share of the City's new permitting has been concentrated in areas near Downtown and in transit corridors, areas that have limited though increasing overlap with high opportunity areas.¹⁴⁹ Although the expansion of public transportation into West LA and the Valley through the Expo Line and the Red Line has increased new construction in high opportunity areas, if new development is going to further the goals of fair housing and desegregation, measures must be taken to ensure that new development is both available to members of protected class and spread widely across the city, including in West LA and Valley neighborhoods not served by new transit lines.

When investments are made in majority-minority areas, the City must ensure that they do not displace current residents. For example, a University of California Los Angeles (UCLA) study shows that non-Hispanic White, college educated populations tend to move into areas with newly developed public transportation.¹⁵⁰ While this may result in economic development and higher property values for homeowners in previously under-invested neighborhoods, in order for integration to be stable, the relocation of non-Hispanic White households to neighborhoods with concentrations of Black and Hispanic renters must not result in the wholesale displacement of people of color from those communities. Los Angeles has the highest rentership rate of any metropolitan area in the country.¹⁵¹ Demographically, people of color and low-income tenants make up a disproportionately large share of the renter-population and therefore are most likely to be vulnerable to displacement.¹⁵² In Echo Park, many Hispanic families that have been living there for decades have been displaced due to increasing demand to move into the neighborhood.¹⁵³ Similar trends are displacing residents across the City in neighborhoods like Koreatown, Mid-City, Westlake, and more.¹⁵⁴ Consequently, displaced low-income people of color are forced into an ever-decreasing stock of affordable housing, much of which is in relatively high poverty areas, allowing R/ECAPs to emerge and perpetuating segregation.

The City has taken positive steps to protect more vulnerable renters by, for example, stricter enforcement of the Ellis Act provisions to ensure any new development does not substantially reduce the stock of affordable housing¹⁵⁵ and passing a series of measures to track and preserve affordable housing.¹⁵⁶ The City has also created a Rent Registry Program requiring landlords to provide the rent amount for every rental unit subject to the Rent Stabilization Ordinance (RSO).¹⁵⁷ Additionally, the City Council approved an amendment to the

¹⁴⁸ <http://www.scpr.org/news/2015/08/03/53498/affordable-housing-disappearing-as-contracts-expir/>

¹⁴⁹ <http://www.abundanthousingla.org/2017/01/03/dont-call-it-a-boom-la-housing-growth/>

¹⁵⁰ <http://www.urbandisplacement.org/case-studies/ucla>

¹⁵¹ Harvard Joint Center for Housing; America's Rental Evolution -- Evolving Markets and Needs

¹⁵² Id.

¹⁵³ <http://www.latimes.com/local/california/la-me-0315-lopez-echo-20150313-column.html>

¹⁵⁴ <https://la.curbed.com/2016/8/30/12712942/gentrification-map-los-angeles-county>

¹⁵⁵ <http://www.latimes.com/local/lanow/la-me-ln-housing-ellis-act-20170404-story.html>

¹⁵⁶ <https://la.curbed.com/2017/4/27/15438878/los-angeles-affordable-housing-rules-tenant-rights>

¹⁵⁷ <http://hcidla.lacity.org/rentregistry>

RSO requiring that tenants receive notice prior to the execution of a “cash for keys” agreement to vacate an RSO rental unit.¹⁵⁸ These measure may help lessen the greater economic pressure faced by tenants in communities of color that make them vulnerable to displacement as a result of economic pressures.

iv. Disproportionate Housing Needs

Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

Within both the City of Los Angeles and the broader region, most racial or ethnic minority groups experience higher rates of housing problems, including but not limited to severe housing cost burden, than do non-Hispanic White households. The only exception to this is the Asian Pacific Islander population, which experiences higher rates of housing problems than non-Hispanic White households but lower rates of severe housing cost burden. Among all racial or ethnic groups, Hispanic households are most likely to experience severe housing problems and Black households are most likely to experience severe housing cost burden. Families with five or more members experience housing problems at the highest rate, followed by non-family households. Small families with four or fewer members experience housing problems at the lowest rate of any household type. Disparities between small and large families are less pronounced for severe cost burden than they are for other types of housing problems. The total percentage of households with housing problems and severe housing problems is greater in the City than in the region.

Housing Problems

Table 1 Housing Problems

Jurisdiction:	Los Angeles, CA (CDBG, HOME, ESG)			Los Angeles- Long Beach- Anaheim, CA		
Households Experiencing Any of 4 or More Housing Problems	Number households with problems	Number households overall	Percentage households with problems	Number households with problems	Number households overall	Percentage households with problems
Race/Ethnicity						
White, non-Hispanic	243,765	510,140	47.78%	755,745	1,766,510	42.78%
Black, non-Hispanic	90,575	146,570	61.80%	192,655	333,080	57.84%
Hispanic	338,720	471,240	71.88%	929,985	1,405,070	66.19%
Asian and Pacific Islander, non-Hispanic	85,949	162,019	53.05%	312,065	629,349	49.59%
Native American, non-Hispanic	1,690	2,965	57.00%	4,990	9,520	52.42%

¹⁵⁸ <http://hcidla.lacity.org/cash-keys>

Other, non-Hispanic	15,840	27,995	56.58%	42,365	82,340	51.45%
<i>Total</i>	<i>776,555</i>	<i>1,320,960</i>	<i>58.79%</i>	<i>2,237,810</i>	<i>4,225,895</i>	<i>52.95%</i>
Household Type and Size						
Family households, <5 people	341,990	623,250	54.87%	1,061,155	2,236,590	47.45%
Family households, 5+ people	141,440	176,270	80.24%	472,725	646,795	73.09%
Non-family households	293,120	521,425	56.22%	703,940	1,342,510	52.43%
Households experiencing any of 4 Severe Housing Problems	Number households with severe problems	Number households overall	Percentage households with severe problems	Number households with severe problems	Number households overall	Percentage households with severe problems
Race/Ethnicity						
White, non-Hispanic	140,185	516,590	27.48%	404,505	1,766,510	22.90%
Black, non-Hispanic	58,255	146,570	39.75%	118,350	333,080	35.53%
Hispanic	253,335	471,240	53.76%	663,905	1,405,070	47.25%
Asian and Pacific Islander, non-Hispanic	53,569	162,019	33.06%	187,450	629,349	29.78%
Native American, non-Hispanic	1,055	2,965	35.58%	2,818	9,520	29.60%
Other, non-Hispanic	10,170	27,995	36.33%	24,670	82,340	29.96%
<i>Total</i>	<i>516,590</i>	<i>1,320,960</i>	<i>39.11%</i>	<i>1,401,660</i>	<i>4,225,895</i>	<i>33.17%</i>

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30%.

The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 50%.

Note 2: All percentages represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data sources CHAS

Housing Cost Burden

Table 2 Housing Cost Burden

Jurisdiction:	Los Angeles, CA (CDBG, HOME, ESG)			Los Angeles – Long Beach – Anaheim, CA		
Households with Severe Housing Cost Burden	Number with severe cost burden	Number of households overall	Percentage with severe cost burden	Number with severe cost burden	Number of households overall	Percentage with severe cost burden
Race/Ethnicity						
White, non-Hispanic	126,245	510,140	24.75%	363,575	1,766,510	20.58%
Black, non-Hispanic	49,435	146,570	33.73%	100,510	333,080	30.18%
Hispanic	152,075	471,240	32.27%	393,495	1,405,070	28.01%
Asian and Pacific Islander, non-Hispanic	38,150	162,019	23.55%	135,840	629,349	21.58%
Native American, non-Hispanic	800	2,965	26.98%	2,210	9,520	23.21%
Other, non-Hispanic	8,350	27,995	29.83%	2,210	82,340	24.83%
<i>Total</i>	<i>375,055</i>	<i>1,320,960</i>	<i>28.39%</i>	<i>1,016,075</i>	<i>4,225,895</i>	<i>24.04%</i>
Household Type and Size						
Family Households, <5 people	169,295	623,250	27.16%	499,320	2,236,590	22.33%
Family Households, 5+ people	44,904	176,270	25.47%	136,540	2,236,590	21.11%
Non-Family Households	160,855	521,425	30.85%	380,210	1,342,510	28.32%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All percentages represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

Note 4: [Refer to the Data Documentation for details \(www.hudexchange.info\)](http://www.hudexchange.info).

In addition to the HUD provided data breaking down the proportion of households experiencing housing problems who are subject to overcrowding or incomplete plumbing and kitchen facilities by race or ethnicity, the American Community Survey also provides additional context. That data shows that overcrowding is much more common than incomplete plumbing and kitchen facilities. Within the City of LA, 13.4% of households have more than one occupant per room, and, in the region, 11.2% of households have more than one occupant per room. By contrast, just 0.7% of occupied housing units in the City and 0.4% of occupied housing units in the region lack complete plumbing facilities, while 2.0% of occupied housing units in the City and 1.5% of occupied housing units in the region lack complete kitchen facilities. In light of the apparent disconnect between the rate at which Black and Hispanic households experience housing problems generally and housing cost burden specifically, with Hispanic households experiencing greater problems but less cost burden, high rates of overcrowding among Hispanic households could explain the difference. The table below shows that the data bears this out. Hispanic and, to a lesser extent, Asian households experience overcrowding at disproportionate rates. In the case of Hispanic households, the degree of disproportionality is staggeringly high.

Table 3 Percentage of Overcrowded Households by Race or Ethnicity, LA City and Region, 2011-2015 American Community Survey

Geography	Non-Hispanic White Households	Black Households	Asian Households	Hispanic Households
City of Los Angeles	2.5%	5.3%	10.3%	29.2%
Los Angeles-Long Beach-Anaheim, CA MSA	2.1%	5.3%	8.6%	25.0%

Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

The entire City is experiencing unprecedented housing burdens. Residents in the City of Los Angeles tend to have higher rent burdens as compared to residents of the region at large. Within the City of Los Angeles, the areas with the greatest housing burdens are in the San Fernando Valley, the Eastside, including Boyle Heights, and South LA. These areas have higher minority populations, are more segregated, and have higher concentrations of R/ECAPs. In general, the City's segregated, heavily non-Hispanic White areas have relatively low levels of housing burden. Also, although Asian and Pacific Islander residents have a relatively low rent burden overall, Koreatown, Chinatown, and Little Tokyo all have concentrations of foreign-born residents in areas of high housing burden.

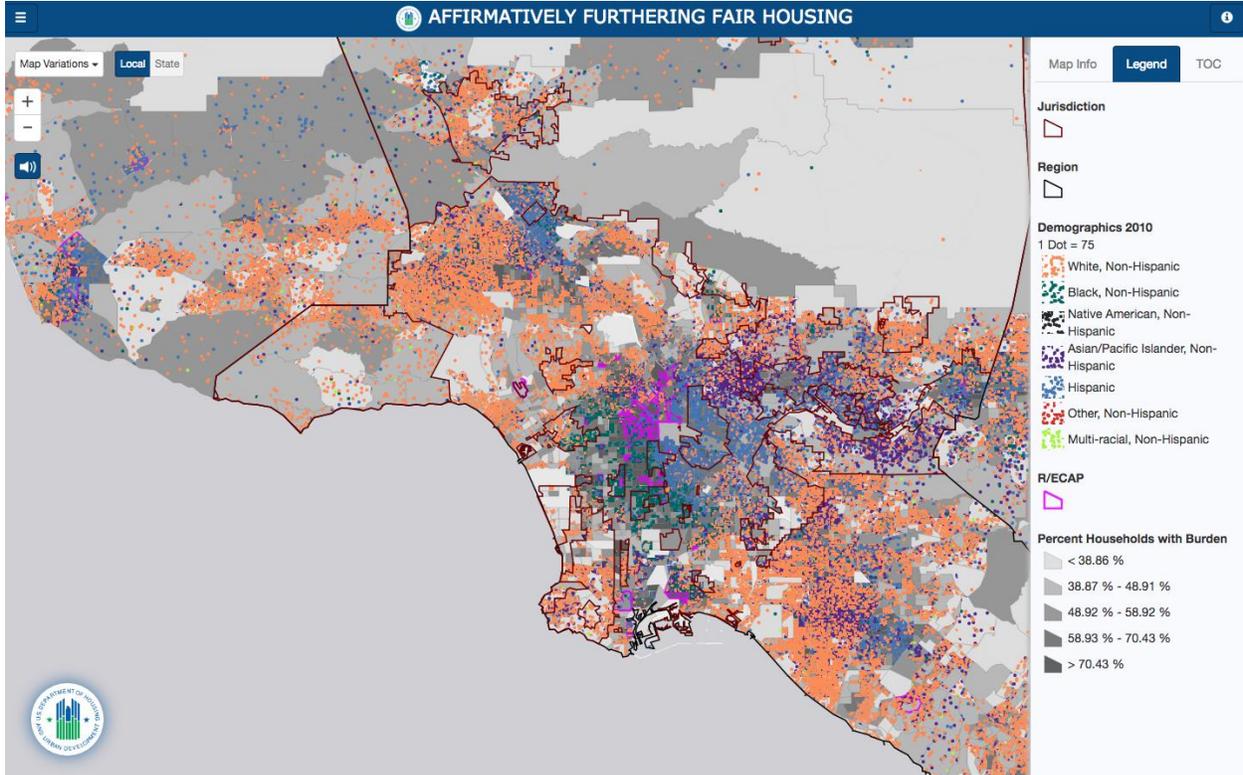
Countywide, each household would have to earn \$29.71 an hour to afford a 2-bedroom apartment at fair market value.¹⁵⁹ Making minimum wage, a person would need almost three full-time jobs to afford that 2-bedroom apartment.¹⁶⁰ There are a few concentrations of higher levels of housing burden in the Antelope

¹⁵⁹ Out of Reach 2017, National Low Income Housing Coalition

¹⁶⁰ Id

Valley and Southeast Los Angeles County. While those areas do contain a few R/ECAPs, the heaviest concentration of R/ECAPs is within City limits.

Map 4 Demographics of Households with Disproportionate Housing Needs for the Los Angeles Region



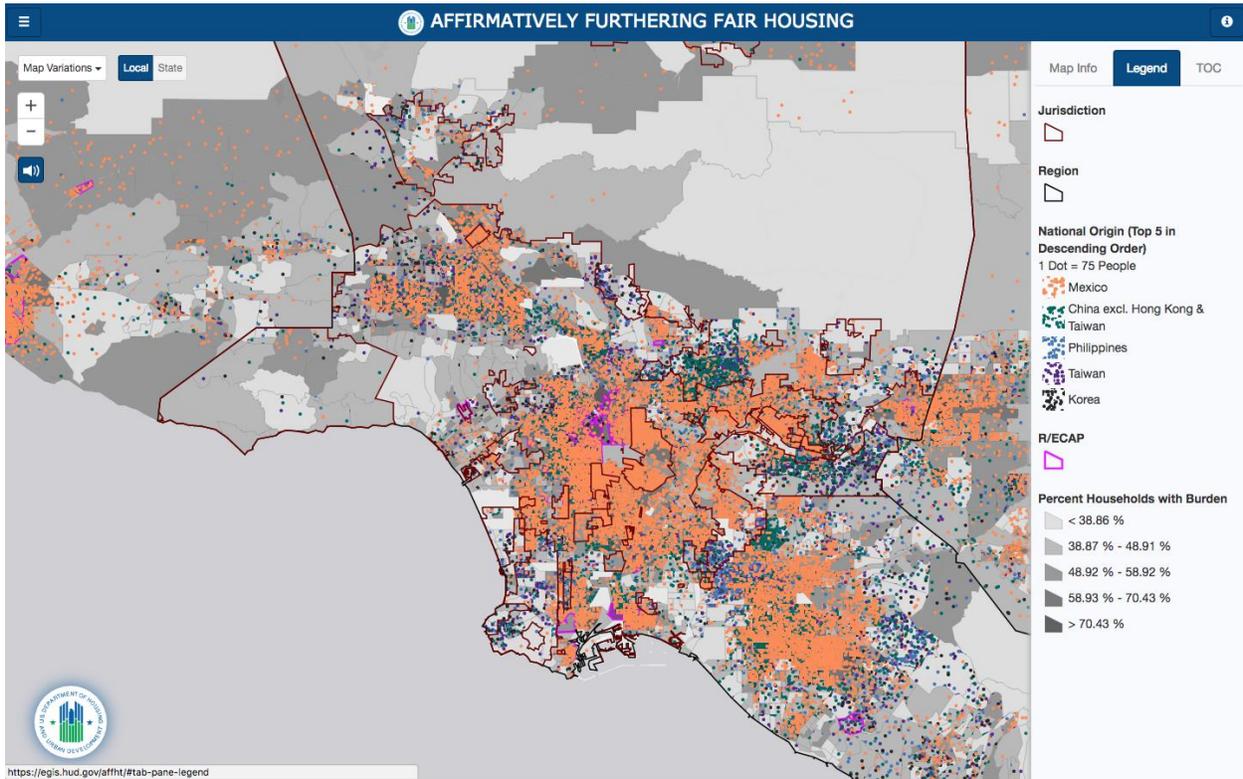
Name: Map 6 – Demographics of Households with Disproportionate Housing Needs

Description: Households experiencing one or more household burden in Jurisdiction and Region with R/ECAPs and race/ethnicity dot density.

Jurisdiction: Los Angeles, CA

Region: Los Angeles – Long Beach – Anaheim, CA

Map 5 Demographics of Households with Disproportionate Housing Needs for Top 5 National Origin Populations for the Los Angeles Region



Name: Map 6 – Demographics of Households with Disproportionate Housing Needs

Description: Households experiencing one or more household burden in Jurisdiction and Region with R/ECAPs and national origin dot density.

Jurisdiction: Los Angeles, CA

Region: Los Angeles – Long Beach – Anaheim, CA

Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

Table 6 Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

Los Angeles, CA (CDBG, HOME, ESG)								
Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	1,152	16.32%	3,396	48.12%	2,489	35.27%	3,927	55.65%
Project-Based Section 8	16,034	76.71%	3,139	15.02%	1,406	6.73%	2,932	14.03%
Other Multifamily	2,942	96.52%	16	0.52%	0	0.00%	7	0.23%
HCV Program	20,141	45.81%	15,618	35.52%	7,347	16.71%	12,013	27.32%
Note 1: Data Sources: APSH								
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).								

There are 375,055 households in the City experiencing severe housing cost burden. 214,169 of these households are families. However, there are only 33,411 Publicly Supported Housing units with more than one bedroom capable of housing these families. Although the Public Housing program supports households in a balanced mix of unit sizes, other types of Publicly Supported Housing are skewed toward 0-1 bedroom units. Project-Based Section 8, Other Multifamily, and HCV Program housing all dramatically skew toward 0-1 bedroom units; though these programs serve their target populations, consistent with applicant flow, the underserving of families with children is troubling. Given the lack of available, affordable multi-family housing units in the City, it is clear that the existing stock of Publicly Supported Housing is underserving families with children.

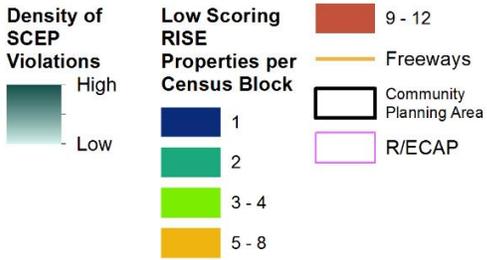
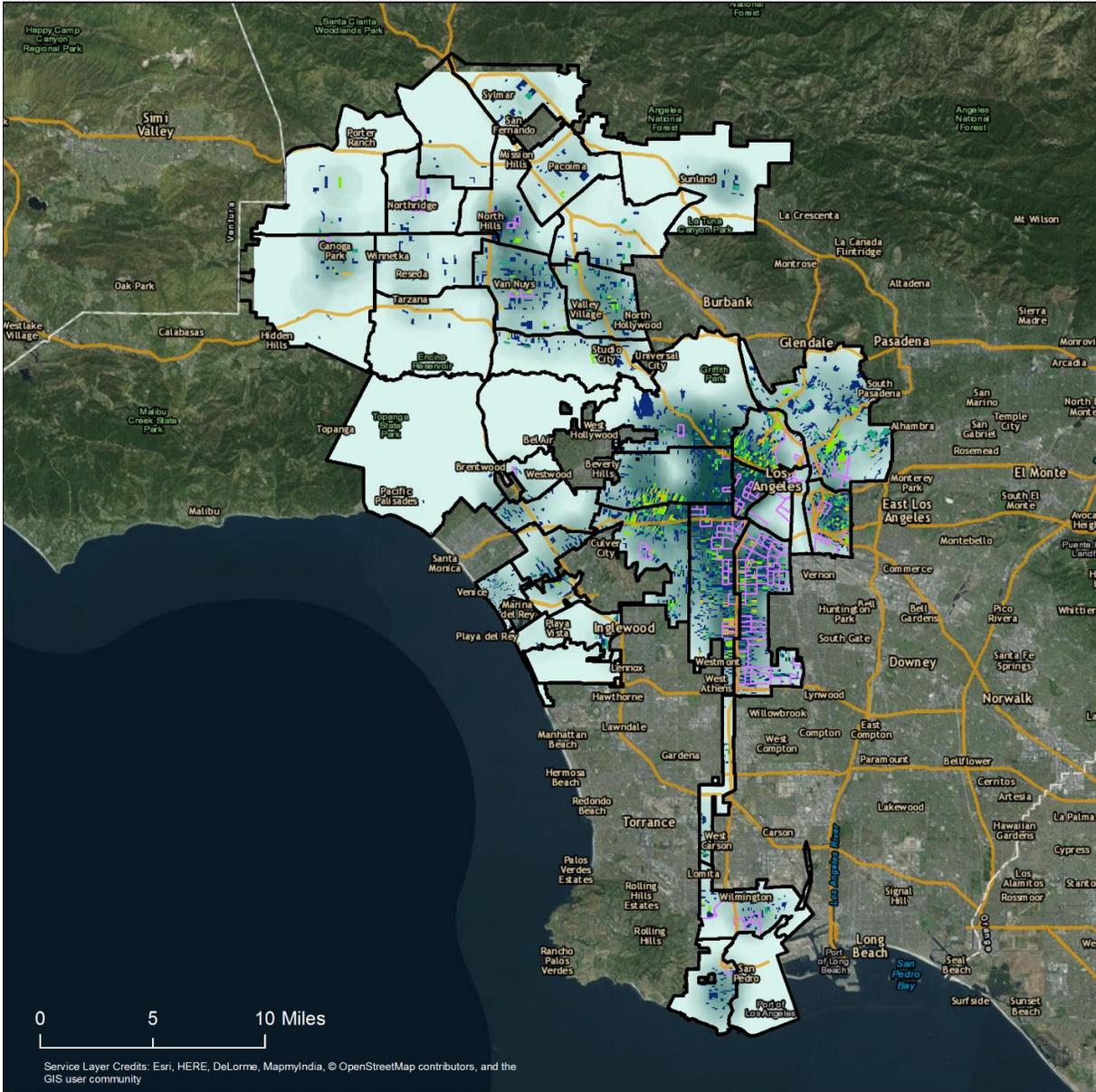
Although demographic data on households exposed to a broader range of substandard conditions, including physical deterioration such as peeling paint, broken windows, and exposed wiring, is not available, data reflecting the geographic distribution of non-compliant properties is. The City of Los Angeles assigns Reliable Information to Score Effectively (“RISE”) score to properties within the scope of the Systematic Code Enforcement Program (SCEP) administered by HCIDLA. A property receiving a RISE score of less than seven is considered poorly maintained or non-compliant property. Non-compliant properties include properties where the number of violations is over five per unit, a case takes over 120 days to achieve compliance, the case is referred to enforcement, there are more than three valid complaints, a case requires a hearing before the General Manager of HCIDLA or a substandard order is issued. The map below shows concentrations of poorly maintained-non-compliant properties from 2010-2014.

SCEP inspectors periodically inspect residential rental units to verify compliance with State Health and Safety Codes and Building Codes. Among other things, SCEP inspectors identify and facilitate abatement of unsanitary and substandard conditions in residential rental units. After review of inspections from SCEP

Cycle 3 it is evident that a majority of poorly maintained-non-compliant rental units are concentrated in Central and South Los Angeles.

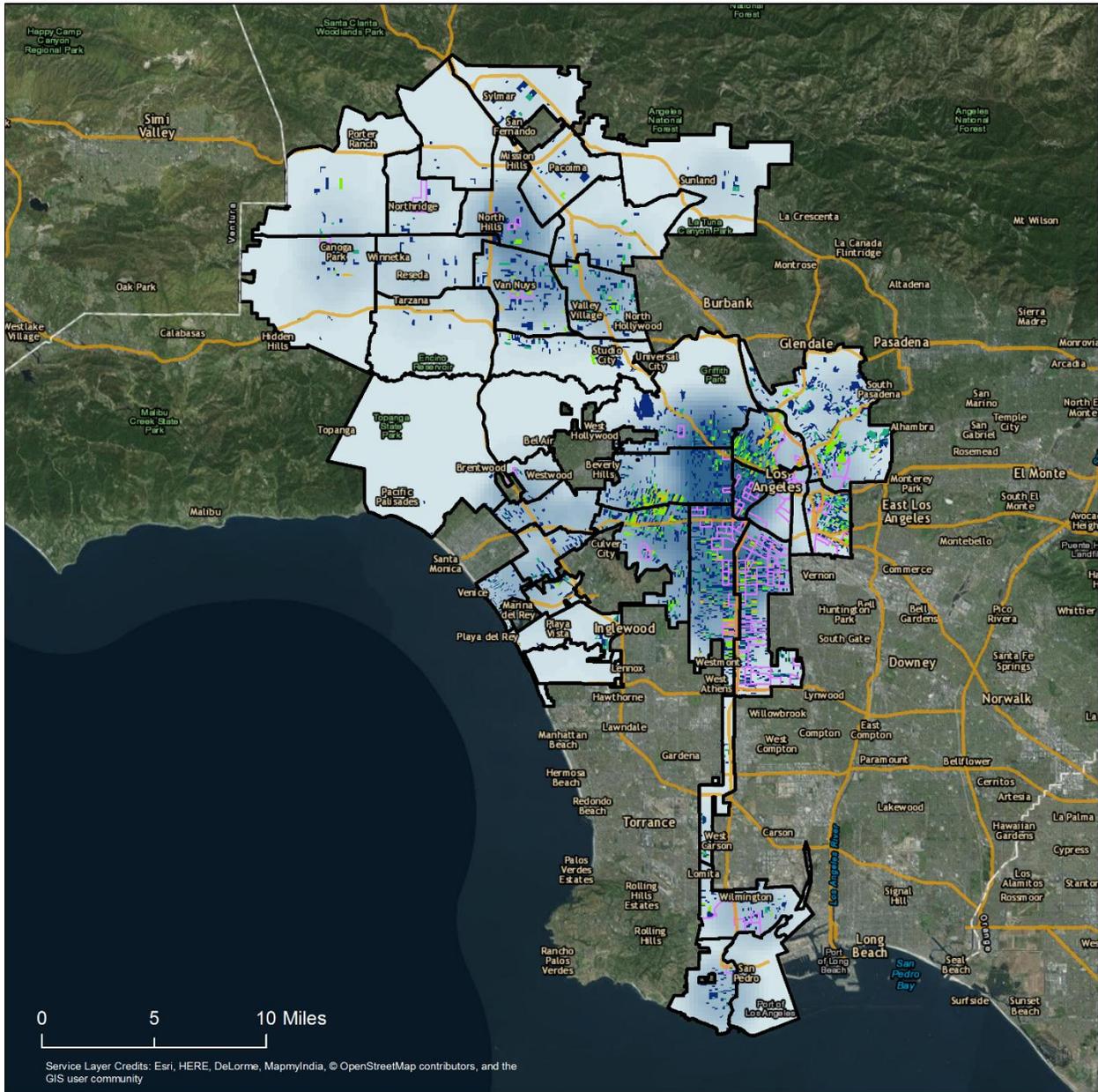
Map 7

City of L.A. AFH: Systematic Code Enforcement Program Cycle III With Low RISE Scoring Properties per Census Block



Map 8

City of L.A. AFH: Systematic Code Enforcement Program Cycle IV With Low RISE Scoring Properties per Census Block



Concentrations of properties with RISE scores of less than seven follow patterns of both multi-family residential concentration (since single-family and commercial properties are not inspected) and racial and ethnic concentration. Such areas include Exposition Park, Central-Alameda, and Vermont Knolls in South LA and Westlake and Silverlake in Central Area. With the exception of Silverlake, which is relatively integrated in comparison to the City as a whole, all of these areas are heavily minority. This suggests that it is likely that Black and Hispanic households are disproportionately likely to live in dwellings in multi-unit structures that have serious and persistent code violations.

Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

B25003: TENURE - Universe: Occupied housing units
2011-2015 American Community Survey 5-Year Estimates

	Los Angeles, CA		Los Angeles – Long Beach – Anaheim, CA	
	Estimate	Percentage	Estimate	Percentage
Total:	1,342,761	N/A	4,272,422	N/A
Owner occupied	494,682	36.84%	2,082,030	48.73%
Renter occupied	848,079	63.16%	2,190,392	51.27%

B25003H: TENURE (WHITE ALONE, NOT HISPANIC OR LATINO HOUSEHOLDER) - Universe:
Occupied housing units with a householder who is White alone, not Hispanic or Latino
2011-2015 American Community Survey 5-Year Estimates

	Los Angeles, CA		Los Angeles – Long Beach – Anaheim, CA	
	Estimate	Percentage	Estimate	Percentage
Total:	513,277	N/A	1,744,354	N/A
Owner occupied	246,436	48.01%	1,021,584	58.57%
Renter occupied	266,841	51.99%	722,770	41.43%

B25003B: TENURE (BLACK OR AFRICAN AMERICAN ALONE HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Black or African American alone

2011-2015 American Community Survey 5-Year Estimates

	Los Angeles, CA		Los Angeles – Long Beach – Anaheim, CA	
	Estimate	Percentage	Estimate	Percentage
Total:	150,130	N/A	341,721	N/A
Owner occupied	41,374	27.56%	116,958	34.23%
Renter occupied	108,756	72.44%	224,763	65.77%

B25003D: TENURE (ASIAN ALONE HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Asian alone

2011-2015 American Community Survey 5-Year Estimates

	Los Angeles, CA		Los Angeles – Long Beach – Anaheim, CA	
	Estimate	Percentage	Estimate	Percentage
Total:	167,278	N/A	652,655	N/A
Owner occupied	61,295	36.64%	354,297	54.29%
Renter occupied	105,983	63.36%	298,358	45.71%

B25003I: TENURE (HISPANIC OR LATINO HOUSEHOLDER) - Universe: Occupied housing units with a householder who is Hispanic or Latino

2011-2015 American Community Survey 5-Year Estimates

	Los Angeles, CA		Los Angeles – Long Beach – Anaheim, CA	
	Estimate	Percentage	Estimate	Percentage
Total:	482,094	N/A	1,440,832	N/A
Owner occupied	135,605	28.13%	551,019	38.24%
Renter occupied	346,489	71.87%	889,813	61.76%

In the City of Los Angeles, non-Hispanic White households experience the highest levels of homeownership. By contrast, Black and Hispanic households experience relatively similar housing tenure, characterized by the lowest levels of homeownership. Asian households have slightly higher homeownership rates. These disparities persist at the regional level, although all groups are more likely to be homeowners in the region than in the City.

Additional Information

Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics. (TBD)

B25035: MEDIAN YEAR STRUCTURE BUILT
2011-2015 American Community Survey

	Los Angeles, CA		Los Angeles – Long Beach – Anaheim, CA	
	Estimate	Margin of Error	Estimate	Margin of Error
Median Year Structure Built	1961	+/-1	1966	+/-1

In addition to HUD-provided data, information about the age of the housing stock in the City of Los Angeles may reflect housing condition issues, potentially including lead paint exposure, that are suggestive of disproportionate housing needs. The chart above shows that the housing stock in both the City and the region is more than half a century old, with the City’s housing stock skewing slightly older compared to the region at large. Areas with relatively new housing stock are predominantly non-Hispanic White, while, with some exceptions, areas with older housing stock tend to include predominantly Black portions of the region. However, in a positive step forward, areas with a concentration of pre-1940 housing, low-income residents, and minority populations were identified as high-risk communities to be prioritized for lead abatement in the City’s 2013-2017 Consolidated Plan.

The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA’s overriding housing needs analysis.

Homelessness

Although the experience of homelessness is not reflected in HUD-provided data regarding the prevalence of housing problems, the homelessness problem in LA is arguably one of the most pressing housing problems in Los Angeles and provides a stark illustration of the disproportionate housing needs of protected classes in the area. The 2017 Greater Los Angeles Homeless Count revealed that the number of homeless people grew by 20% in the City and 23% countywide in just one year. Mayor Eric Garcetti and other City officials have cited many of the factors that contribute to disproportionate housing needs, like increasing rent burdens, stagnant wages, and lack of affordable housing, as drivers to the rapid increases in homelessness in the City.¹⁶¹ Of the around 34,000 people who are experiencing homelessness in Los Angeles, only one in four is sheltered – either in long-term transitional housing or temporary emergency shelter.¹⁶² The vast majority of LA’s homeless population is living on the streets.

Homelessness, like other issues of displacement and housing burdens, particularly impacts protected classes. People of color are heavily overrepresented in the area’s homeless population, specifically Black and Hispanic individuals. Although just under 10% of the City’s population identifies as Black, Black individuals and families represent 44% of the City’s homeless population.¹⁶³ Together, Black and Hispanic

¹⁶¹ <http://www.latimes.com/local/lanow/la-me-ln-homeless-count-20170530-story.html>

¹⁶² 2017 Greater Los Angeles Homeless Count - Data Summary - City of Los Angeles

¹⁶³ Id

individuals make up almost 75% of the City’s homeless population.¹⁶⁴ The Hispanic population is also the fastest growing demographic newly experiencing homelessness.¹⁶⁵

A significant and growing portion of the homeless population also reports one or more serious disability. From 2016 to 2017, the homeless population reporting a developmental disability and HIV/AIDS grew by 90% and 86% respectively.¹⁶⁶ Those that report a disability are also less likely to be sheltered than their non-disabled counterparts.¹⁶⁷ Other groups that have experienced marked increases in homelessness are unaccompanied minors, veterans, and those who are homeless as a result of domestic violence, increasing by 152%, 137%, and 128% respectively between 2016 and 2017.¹⁶⁸

There have been strides in a positive direction. In 2017, two initiatives, Proposition HHH in the City and Measure H in the County, passed, which together will provide \$4.7 billion over ten years to create or subsidize 15,000 units for the homeless (10,000 of which would be produced through Proposition HHH) as well as support services for residents.¹⁶⁹ Despite the City’s best efforts to create 15,000 additional affordable housing units, there are not enough resources to meeting the full need, which is expected to continue to grow over the next decade. Also, there has already been some significant community opposition to these new developments, a barrier implementation that is not likely to go away. The City will have to be mindful that these projects are not relegated to low-income communities of color, further entrenching existing segregation and R/ECAPs.

Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

Availability of affordable units in a range of sizes

The availability, or lack thereof, of affordable units in a range of sizes is a significant contributing factor to housing cost burden and overcrowding among Black and Hispanic households and large families with children in LA using the HUD provided data through the AFFH Tool, Table 9¹⁷⁰ indicates that 58.79% of households within the City of LA are experiencing any of the four housing problems resulting from more than one person in a room, incomplete kitchen facilities, incomplete plumbing facilities, and are cost burdened by paying more than 30% of their gross income toward housing. In other words, 35% of households facing disproportionate housing needs in the region reside within the City of LA, Black and Hispanic households are particularly impacted with 90,575 (61.80%) Black households and 338,720 (71.88%) Hispanic households confronted by one or more of the four housing problems defined by HUD.

¹⁶⁴ Id 2017 Greater Los Angeles Homeless Count - Data Summary - City of Los Angeles

¹⁶⁵ Id

¹⁶⁶ Id

¹⁶⁷ Id

¹⁶⁸ Id

¹⁶⁹ <http://www.latimes.com/local/lanow/la-me-ln-homeless-count-20170530-story.html>

¹⁷⁰ Department of Housing and Urban Development; *Demographics of Housing with Disproportionate Housing Needs*; US Dept. Housing and Urban Development Affirmatively Furthering Fair Housing (AFFH) Tool, 9 Jun. 2017; table 9.

Applying Table 11¹⁷¹ Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children, a majority of households with children in units with 2 bedrooms or 3+ bedrooms that live in Publicly Supported Housing reside within public housing units. However, the availability of public housing units is scarce, and, looking at Table 11 in section c, most affordable units are supplied by Project Based Section 8 and Low Income Housing Tax Credits, which, based on Table 11, house lower rates of families with children.

Displacement of residents due to economic pressures

Displacement of residents due to economic pressures, is a significant contributing factor if not the largest contributing factor, to disproportionate housing needs in the City of Los Angeles and the broader region. Over the last decade, the City has faced a serious affordable housing crisis that was, in part, caused by decades of insufficient housing production, particularly in predominantly non-Hispanic White, high opportunity areas, coupled with growing gentrification in more diverse neighborhoods.¹⁷² Mayor Garcetti has made housing production and affordability a key part of his “pLAn” for the City, including developing 100,000 new housing units as well as preserving and building 15,000 affordable units by 2021. However,¹⁷³ some observers believe that the 100,000 planned units may not be enough to meet the demand and slow rent increases. Also, many landlords offer affordable units only because they are obligated to under the contracts they sign with the City when new projects are being developed. When those contracts expire, landlords are able to turn affordable units into more profitable, market-rate housing. As a result, the worst-case scenario is that as many as 15,000 affordable units will be converted to market rate by 2021, although it is expected that a significant percentage of these units will receive annual renewals.¹⁷⁴

Also, unless steps are taken to mitigate the effects of development on low-income renters of color, the City’s development strategy could have unintended consequences. For example, a disproportionate share of the City’s new permitting has been concentrated in areas near Downtown and in transit corridors, areas that have limited though increasing overlap with high opportunity areas.¹⁷⁵ Although the expansion of public transportation into West LA and the Valley through the Expo Line and the Red Line has increased new construction in high opportunity areas, if new development is going to further the goals of fair housing and desegregation, measures must be taken to ensure that new development is both available to members of protected class and spread widely across the city, including in West LA and Valley neighborhoods not served by new transit lines.

When investments are made in majority-minority areas, the City must ensure that they do not displace current residents. For example, a University of California Los Angeles (UCLA) study shows that non-Hispanic White, college educated populations tend to move into areas with newly developed public transportation.¹⁷⁶ While this may result in economic development and higher property values for homeowners in previously under-invested neighborhoods, in order for integration to be stable, the relocation of non-Hispanic White households to neighborhoods with concentrations of Black and Hispanic renters must not result in the wholesale displacement of people of color from those communities. Los Angeles has the highest rentership

¹⁷¹ Department of Housing and Urban Development; *Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children*; US Dept. Housing and Urban Development Affirmatively Furthering Fair Housing (AFFH) Tool, 9 Jun. 2017; table 11.

¹⁷² <http://www.abundanthousingla.org/2017/01/03/dont-call-it-a-boom-la-housing-growth/>

¹⁷³ <http://plan.lamayor.org/portfolio/housing-and-development/>

¹⁷⁴ <http://www.scpr.org/news/2015/08/03/53498/affordable-housing-disappearing-as-contracts-expir/>

¹⁷⁵ <http://www.abundanthousingla.org/2017/01/03/dont-call-it-a-boom-la-housing-growth/>

¹⁷⁶ <http://www.urbandisplacement.org/case-studies/ucla>

rate of any metropolitan area in the country.¹⁷⁷ Demographically, people of color and low-income tenants make up a disproportionately large share of the renter-population and therefore are most likely to be vulnerable to displacement.¹⁷⁸ In Echo Park, many Hispanic families that have been living there for decades have been displaced due to increasing demand to move into the neighborhood.¹⁷⁹ Similar trends are displacing residents across the City in neighborhoods like Koreatown, Mid-City, Westlake, and more.¹⁸⁰ Consequently, displaced low-income people of color are forced into an ever-decreasing stock of affordable housing, much of which is in relatively high poverty areas, allowing R/ECAPs to emerge and perpetuating segregation.

The City has taken positive steps to protect more vulnerable renters by, for example, stricter enforcement of the Ellis Act provisions to ensure any new development does not substantially reduce the stock of affordable housing¹⁸¹ and passing a series of measures to track and preserve affordable housing.¹⁸² The City has also created a Rent Registry Program requiring landlords to provide the rent amount for every rental unit subject to the Rent Stabilization Ordinance (RSO).¹⁸³ Additionally, the City Council approved an amendment to the RSO requiring that tenants receive notice prior to the execution of a “cash for keys” agreement to vacate an RSO rental unit.¹⁸⁴ These measure may help lessen the greater economic pressure faced by tenants in communities of color that make them vulnerable to displacement as a result of economic pressures.¹⁸⁵

¹⁷⁷ Harvard Joint Center for Housing; America’s Rental Evolution -- Evolving Markets and Needs

¹⁷⁸ Id.

¹⁷⁹ <http://www.latimes.com/local/california/la-me-0315-lopez-echo-20150313-column.html>

¹⁸⁰ <https://la.curbed.com/2016/8/30/12712942/gentrification-map-los-angeles-county>

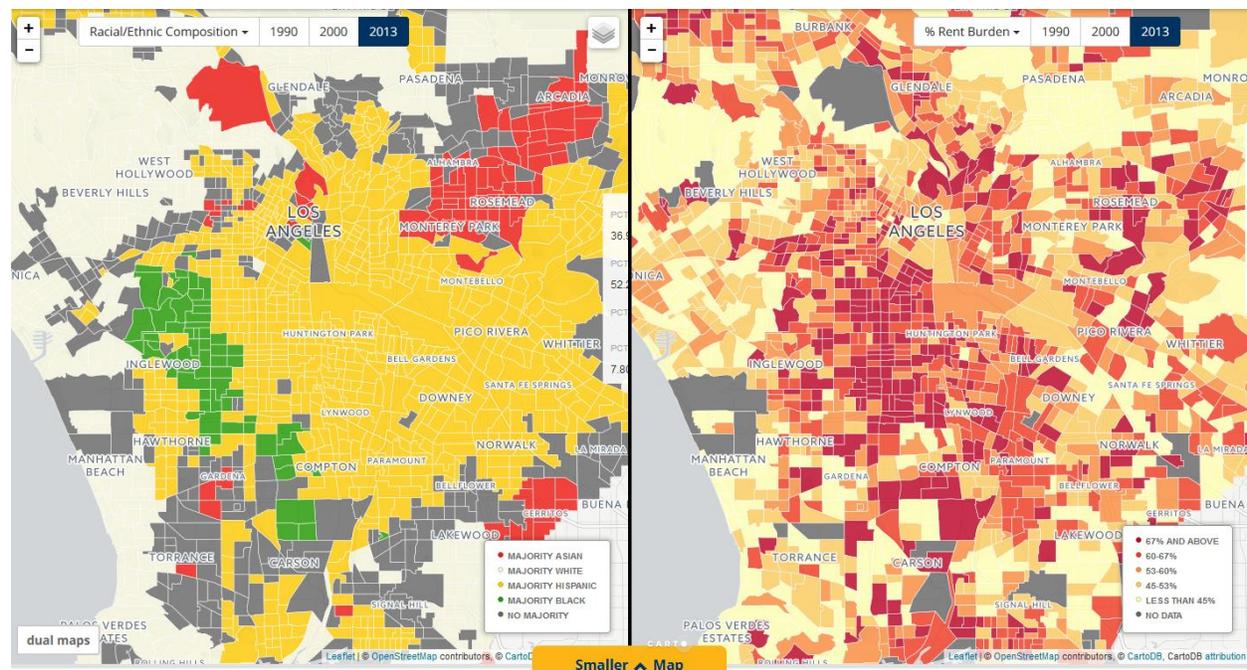
¹⁸¹ <http://www.latimes.com/local/lanow/la-me-ln-housing-ellis-act-20170404-story.html>

¹⁸² <https://la.curbed.com/2017/4/27/15438878/los-angeles-affordable-housing-rules-tenant-rights>

¹⁸³ <http://hcidla.lacity.org/rentregistry>

¹⁸⁴ <http://hcidla.lacity.org/cash-keys>

¹⁸⁵ <http://www.urbandisplacement.org/map/la> The map on the left depicts census tracts by racial majority, and the map on the right depicts the average rent paid as a percentage of household income in each census tract. According to this data, the higher rent burdens are concentrated primarily in neighborhoods of color:



Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking is a contributing factor to disproportionate housing needs, including disparate exposure to homelessness, in Los Angeles and the wider region. Domestic abuse disproportionately impacts women of color.¹⁸⁶ In the second Healthy Neighborhoods Focus Group, a participant stated that, in LA, victims of domestic violence do not leave their abusers due to the lack of housing options available to them, a sentiment substantiated by the sheer number of unsheltered survivors in the City. In 2017, there were over 11,000 homeless survivors of domestic violence in Los Angeles, and only about 10% were sheltered in some way.¹⁸⁷ The same survey revealed that, of the overall homeless population in the region, roughly 10% of respondents were currently fleeing violence.¹⁸⁸ One third of Los Angeles' homeless are women, and 65% of those women have reported experiencing assault.¹⁸⁹

A 2015 audit of the City's efforts to combat domestic violence found that they "were disjointed and inconsistent and did not include all of the elements" a successful support program.¹⁹⁰ Since the audit, the City has increased its efforts and funding for programs to support those facing domestic violence. For example, in 2015, the Los Angeles Police Department (LAPD) had Domestic Abuse Response Teams (DARTs), officers that specialize in responding to domestic violence calls and connecting victims with services in 10 units. Because of a lack of resources, those DARTs were only able to respond to one out of every thirty calls.¹⁹¹ In the last two years, Mayor Garcetti increased funding for DARTs, and the program has since expanded to all 21 units of the LAPD.¹⁹² Los Angeles has also undertaken a public awareness campaign and won a \$450,000 grant from the U.S Department of Justice (DOJ) to \$425,000 provide domestic and sexual abuse response to victims with disabilities.¹⁹³

In addition to the protections given under the Violence Against Women Act (VAWA) and the Fair Housing Act (FHA), LA has enacted additional policy protections for victims of domestic violence seeking Publicly Supported Housing. HACLA's policy regarding victims of domestic violence states that it does "not discriminate against an applicant or public housing resident on the basis of the rights or privileges provided under the VAWA (2005 Violence Against Women Act Pub L. 109-162 Stat 2960). Additionally, being a victim of domestic violence, dating violence or stalking, is not an appropriate basis for denial of admission to or eviction from public housing if the applicant or resident is otherwise qualified for admission or continued assistance."

Due to the huge need for affordable housing spanning across multiple demographics which have a variety of disadvantages including but not limited to socio-economic status, language barriers, educational

¹⁸⁶ <https://thinkprogress.org/how-women-of-color-are-disproportionately-impacted-by-domestic-violence-6674e93a50c5>

¹⁸⁷ 2017 Greater Los Angeles Homeless Count

¹⁸⁸ 2017 Greater Los Angeles Homeless Count

¹⁸⁹ <http://www.latimes.com/projects/la-me-homeless-women/>; <https://www.citylab.com/equity/2016/10/a-brief-history-of-womens-housing-in-los-angeles/505487/>

¹⁹⁰ <http://www.latimes.com/local/lanow/la-me-ln-los-angeles-domestic-violence-audit-20151001-story.html>

¹⁹¹ <http://www.latimes.com/local/lanow/la-me-ln-los-angeles-domestic-violence-audit-20151001-story.html>

¹⁹² <https://www.lamayor.org/mayor-garcetti-launches-bold-new-domestic-violence-awareness-and-prevention-campaign>

¹⁹³ <https://www.lamayor.org/mayor-garcetti-launches-bold-new-domestic-violence-awareness-and-prevention-campaign>

achievement, mental illness, and physical disabilities, HACLA's public housing preferences seek to afford the fairest method to benefit all circumstances. Though domestic violence survivors is not a preference in its Admission and Continuing Occupancy Policy (ACOP) or in the Section 8 Administrative Plan, HACLA has an explicit policy adopted from federal requirements under VAWA, which ensure that those who are or have been victims of domestic violence face no discrimination from their circumstance. HACLA's policies specifically state that "being a victim of domestic violence, dating violence or stalking, is not an appropriate basis for denial of admission to or eviction from a housing program," it goes on to note that "applicants with prior evictions for nuisance...within the past three years will be denied admission." With the final VAWA rule released in November 2016, the HACLA will provide to all applicants denied admission for any reason their rights under VAWA including their ability to appeal the denial.

The problem of lack of safe, affordable housing for domestic violence survivors is not going away. Since 2016, there has been a 128% increase in homeless survivors of domestic violence in the City of Los Angeles.¹⁹⁴ Domestic violence service providers have reported that landlords double charge for rent, taking money from the City and the survivor, and also refuse to accept checks from third parties who may be supporting survivors. In light of these troubling facts, it is clear that to address the disproportionate housing needs of women, particularly low-income women of color, the City must push further to create and ensure housing for survivors of domestic violence.

Lack of access to opportunity due to high housing costs

Lack of access to opportunity due to high housing costs is a significant contributing factor to disproportionate housing needs because lack of access to opportunity limits economic mobility that would ameliorate housing cost burden and overcrowding. The lack of a mandatory inclusionary requirement in all new developments foregoes an opportunity to provide lower income residents with opportunities to live in higher opportunity areas. Additionally, the Low Income Housing Tax Credit (LIHTC) project siting practices between 2003 and 2015 have constructed few units in higher opportunity areas (See Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs).

According to *The Affordable Housing Crisis in Los Angeles: An Employer Perspective (Crisis)*, the high cost of housing limits where lower paid members of the workforce can afford housing and has led large percentages of employees to endure long commutes. The Crisis also recommends the City actively engage with the planning process to make sure that development around transit includes housing at all price points.

The City has created new incentives for Transit Oriented Development. Some are a result of new legislation, such as AB 744 (2015) that created Transit Priority Areas (TPAs) which reduced parking requirements within large transit nodes in the City for new development. Further, SB 743 (2013) and SB 375 (2011) created certain environmental review exceptions to streamline the project process resulting in lowering development costs and incentivizing affordable housing transit-oriented development.

In addition to supporting state-wide legislation to amend the definition of "source of income" to include Housing Choice Vouchers, the City should consider an ordinance to prohibit Housing Choice Voucher discrimination in Los Angeles, as well as an administrative and legal enforcement mechanism. Discrimination against Housing Choice Voucher holders denies those holders opportunities to reside in higher opportunity areas.

¹⁹⁴ 2017 Greater Los Angeles Homeless Count

High costs can have a greater effect on families with children who need multiple bedrooms and individuals with disabilities who need accessible housing or housing located close to accessible transportation.

Lack of private investments in specific neighborhoods

The lack of private investments in specific neighborhoods is a significant contributing factor to disproportionate housing needs in the City of Los Angeles and the broader region. Specific neighborhoods with low-income, high minority populations have the greatest need for private investments to construct or rehabilitate housing, invest in new small businesses, and increase access to community amenities, such as supermarkets, pharmacies, and banks. When assessing the various metrics that reflect lack of private investment in specific neighborhoods, it is indisputable that predominantly low-income, high minority communities suffer the greatest consequences and are often left without an opportunity for economic mobility. Greater economic mobility for protected class members would reduce rent burden by increasing incomes. Generally, the distribution of community problems such as the lack of adequate housing, the lack of investments in small businesses, and the lack of access to community amenities, impedes economic mobility for low-income people of color and prevents them from accessing high opportunity areas, thus perpetuating segregation. One indicator of the level private investment plays in specific neighborhoods is the issuance of building permits for residential developments and new construction. Since January 2013, the LA Department of Building and Safety has issued 14,874 building permits for new construction, including 1,240 for commercial properties, 1,036 for apartment buildings with three or more units, and 12,598 for one or two family dwellings. The combined 2,276 permits for commercial properties and apartments are a useful proximity for private investment trends. The permitted properties are located in 113 zip codes, but nearly half of the properties (1,120) are located in just 24 zip codes that have had 30 or more such building permits. Of those 24 zip codes, none are located in East LA and just one (90011) is located in South LA. Neighborhoods in these sections of the City continue to experience the harmful effects of disinvestment. The problem of lack of private investment, however, is not consistent across all low-income communities of color in LA Neighborhoods like Chinatown, Koreatown, the Westlake District, and Pico-Union are the site of significant private investment. A second metric is economic development that creates jobs and increases access to amenities such as supermarkets, pharmacies, and banks. R/ECAP neighborhoods like Watts and Boyle Heights have limited access to supermarkets, most of which are several miles away and only accessible with personal transportation.

The distribution of grocery stores, provides another lens through which to evaluate the effect of a lack of private investment in specific neighborhoods. Residents who live in neighborhoods located in South LA, are disproportionately subjected to limited supermarket access. These populations overwhelmingly include high percentages of low income Hispanic and Black residents. According to a report by researchers at Johns Hopkins University, "mostly [B]lack neighborhoods present 'a double disadvantage'" in supermarket access. In fact, the study showed that Black neighborhoods with little poverty had fewer supermarkets, on average, than high-poverty White areas. Due to their race and level of poverty, specific neighborhoods with large Black populations lack opportunities for healthy food options and decent wage paying jobs. As an urban sociologist at American University put it, "the systematic refusal of corporations and small businesses to invest more generally in some largely Black and Hispanic neighborhoods robs those communities of the employment and education opportunities, that, over time, encourage healthier eating and living."³ As a result, a lack of private investment in the form of access to super markets and healthy food chains, contribute to the perpetuation of segregated neighborhoods.

Additionally, access to banks is severely limited in R/ECAP neighborhoods, furthering the lack of opportunities to secure funding from global financial institutions that could have impactful results within R/ECAP neighborhoods. South Los Angeles is home to 16 banks, one of which being JPMorgan Chase. On January 23, 2014, JPMorgan Chase announced a \$7 million-dollar grant to four leading Community Development Financial Institutions (CDFIs). The grant is part of the foundation's new CDFI Collaboratives program, a \$33 million commitment to help CDFIs and small business lenders build capacity and to jumpstart job creation in low- and moderate-income communities in the Chase footprint. Neither South LA nor the City of Los Angeles was included in this important economic initiative, whereas Los Angeles County is home to 287 JPMorgan Chase Branches with \$27 billion dollars in deposit. The South Los Angeles study area has 4 branches with a total deposit base of \$201,507,000.00 according to the FDIC Summary of Deposits Report for the period ending June 30, 2013. When leading global financial institutions choose to privately invest into specific low-income communities such as South Los Angeles, positive economic and social results can be seen. Without private investment into the community, neighborhoods like Watts are left without access to traditional and largely affordable capital, and new businesses cannot finance their growth or daily operations in a cost-effective manner. Thus, high minority populations are left in overwhelmingly segregated neighborhoods without opportunities for any upward economic mobility.

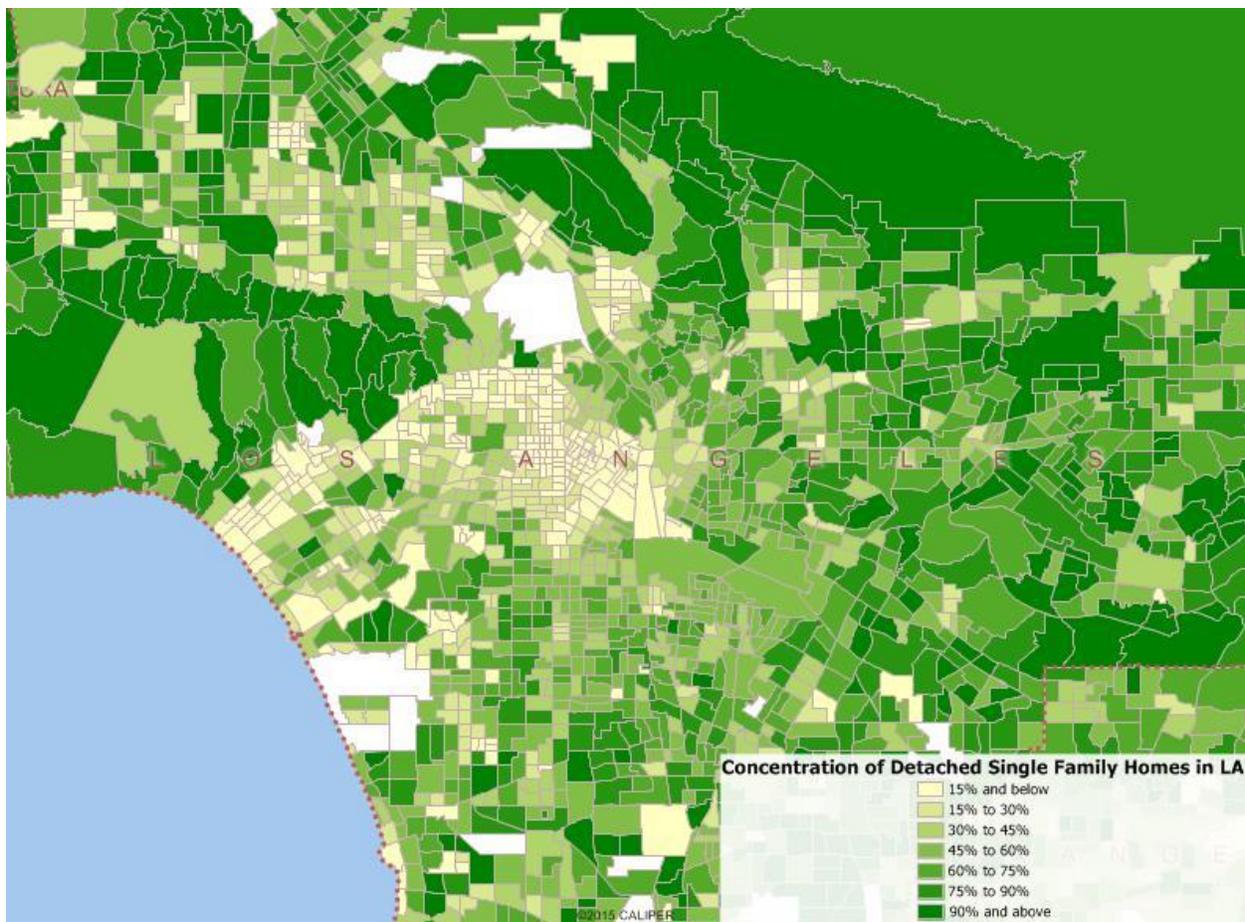
Lack of public investments in specific neighborhoods, including services or amenities

A lack of public investments is a significant contributing factor to disproportionate housing needs in the City of Los Angeles and the broader region. Because high-poverty, high-minority neighborhoods are in greatest need of improved infrastructure and services, residents of such neighborhoods disproportionately suffer from problems such as unpaved streets, low-performing schools, and faulty sidewalks – these markers can serve as metrics indicating insufficient public investment. Generally, the distribution of these types of community problems corresponds to the distribution of R/ECAPs. One metric for public investment is the condition of paved streets. In Watts, which ranks among the lowest in the City of LA in income and in population of non-Hispanic White residents, there is a concentration of paved streets that are in poor condition. A similar condition exists in Westlake, another area with disproportionately high percentages of Hispanic and Asian populations. The distribution of low-performing schools also roughly coincides with the geographic spread of R/ECAPs. According to a report by the California Office to Reform Education, at least two of the five worst-performing high schools were located in R/ECAPs: David Starr Jordan Senior High in Watts and Dr. Maya Angelou Community High in South Park. A third metric is sidewalk condition. While bad sidewalks plague the entire city, as of 2015, the areas with the greatest number of complaints included Downtown and Boyle Heights, both R/ECAPs. Areas with similarly high numbers of complaints are clustered around neighborhoods that are majority-minority and have lower median incomes than other areas of the City. The City voted in 2016 to dedicate over a billion dollars to sidewalk repair, but it is too early to evaluate the success of that investment.

Land use and zoning laws

Land use and zoning laws are a significant contributing factor to disproportionate housing needs in the City of Los Angeles and the broader region. Persons of color disproportionately occupy high-density housing, which can generally be built only in areas zoned for multi-family homes, multiple dwellings, or single-family homes on small lots. As the map below shows, some neighborhoods within LA have much higher concentrations of detached single-family homes than the City as a whole. In particular, neighborhoods in West LA and the San Fernando Valley that are adjacent to or within the Santa Monica Mountains have high concentrations of detached single-family homes at the census tract-level, sometimes exceeding 90%. These neighborhoods include parts of Bel Air, Brentwood, and Pacific Palisades in West LA and parts of Encino,

Tarzana, and Woodland Hills in the Valley, among other areas. Such development patterns are influenced by a wide variety of factors but tend to overlap with residential zoning districts that are restricted to detached single-family homes. At the same time, much of Downtown and East LA, as well as parts of South LA that are relatively close to Downtown, have low concentrations of detached single-family homes. Exceptions to these general trends are numerous, and there are parts of West LA and the Valley that have multi-family housing, as well as parts of Downtown and East LA that have single-family homes. Nonetheless, strategically upzoning portions of communities in West LA and the Valley, which are high opportunity areas near the Santa Monica Mountains would, by resulting in publicly-created value, incentivize property owners to develop multi-family housing. That development would contribute to a more balanced housing stock in those neighborhoods and would create opportunities to foster residential integration within those neighborhoods, which are heavily non-Hispanic White. Increased integration would be particularly likely to result if affordable housing was provided on-site at new multi-family developments in those neighborhoods.



In 2016, a public referendum, Measure JJJ or the “Build Better LA” initiative passed with 65% of voters approving. Measure JJJ requires that rental projects that receive more than a 35% increase in density provide at least 5% of the total number of units at rents affordable to extremely low-income households, plus either 6% of units to very low-income households or 15% of units to lower-income households. Measure JJJ allows developers to meet the affordable housing requirements by building units on site, building units off-site, acquiring and preserving existing at-risk affordable properties, or paying an in-lieu fee. The in-lieu fee

amount specified in Measure JJJ is equal to 1.1 times the number of affordable units that the developer would otherwise be required to provide, multiplied by an “affordability gap”. The high in-lieu fees may promote more on-site affordable housing development leading to more mixed income housing opportunities in the City. However, the “in-lieu” option has shortcomings and may allow developers to concentrate affordable housing in already segregated areas whereas affordable housing would have to be provided on-site if there was no in-lieu fee option. Finally, multiple dwelling zones, like one-family dwelling zones, require a set-aside of parking spaces based on the number of habitable rooms in the zone. Given that households below the poverty line are proportionally less likely to use a car to commute to work, these parking space requirements may hinder the development of larger multi-family projects. Re:code LA, an initiative to revise LA’s zoning code, is considering altering parking requirements based on the context of the zone.

The City has also worked within the confines of unfavorable court decisions to foster the development of affordable housing through inclusionary zoning. Although the City is barred from mandating the inclusion of affordable rental units in residential developments by a judicial decision, the City uses its Density Bonus program to incentivize the inclusion of affordable rental units. The City also created an Expedited Permitting Section in its Department of City Planning to facilitate affordable housing development.

Lending Discrimination

Lending discrimination contributes to the disproportionate housing needs of individuals who are members of protected classes in the City and the broader Los Angeles metropolitan area. Lending discrimination negatively impacts the ability of people of color to access mortgages and other financial services on equal terms. Constrained access to lending may prevent individuals from maintaining, repairing, and making improvements to the condition of housing. Moreover, lending discrimination can prevent individuals from accessing housing in neighborhoods that have higher quality housing stock.

Lending discrimination is widespread. For example, in 2016, the California Reinvestment Coalition and Fair Housing Advocates of Northern California filed a complaint with the U.S. Department of Housing and Urban Development (HUD) against OneWest Bank, based in Pasadena, for allegedly discriminating against Black, Asian American, and Hispanic borrowers seeking home mortgages and other types of loans and for underserving people of color by locating disproportionately fewer branch locations in communities of color in Southern California. Home Mortgage Disclosure Act (HMDA) data from 2015 also reveals that racial disparities persist in lending in the Los Angeles metropolitan area. Hispanic, Black, and Asian American buyers in the Los Angeles housing market are denied conventional home loans at higher rates than non-Hispanic Whites. While 9.9% of White applicants were denied conventional loans, 11.1% of Asian American applicants were denied, 12.9% of Hispanic applicants were denied, and 16.6% of Black applicants were denied loans. Another analysis of HMDA data from 2012-2014 found that Black applicants received only 4% of home mortgage loan originations in Los Angeles County despite making up 8% of the county’s population while Hispanics received 29% of all home mortgage originations despite making up 45% of the county’s population.¹⁹⁵ Additionally, Black and Hispanic borrowers in California are much more likely than White or Asian borrowers to receive government-backed loans with higher costs regardless of income.¹⁹⁶ These disparities in lending practices affect the ability of people of color to access credit needed

¹⁹⁵ http://www.responsiblelending.org/sites/default/files/nodes/files/research-publication/crl_drought_mortaccess_jul2016.pdf

¹⁹⁶ http://www.responsiblelending.org/sites/default/files/nodes/files/research-publication/crl_drought_mortaccess_jul2016.pdf

to become homeowners and thus contribute to differences in rates of renter and owner occupied housing by race and ethnicity.

Loss of affordable housing

Loss of affordable housing is a significant contributing factor to disproportionate housing needs and, in particular, housing cost burden for Black and Hispanic households in LA. Housing prices in Los Angeles have grown four times faster than incomes since 2000. And almost 2/3 of all households in the City are housing burdened (meaning they spend more than the recommended 30% of their income on rent or mortgage payments).

The California Housing Partnership Corporation projects that about 14,000 units spread across 232 buildings in LA County are at "high" or "very high" risk of being converted to market rates over the next five years with a significant percentage of those units residing within LA City-limits.

These units have been priced at below-market rates for typically 30 to 40 years as a condition of getting financing or permission to build. But with these expiring affordability restrictions, some are deciding to take advantage of the county's hot housing market.

According to American Community Survey (ACS) Data, between 2010 and 2015, the number of rent burdened residents in the City of Los Angeles increased by 11.3%.

Overall, the City has set ambitious affordable housing development (permitting 100,000 new housing units by 2021) and preservation (at least 15,000 affordable units for low-income households by 2021) goals. However, between 2010 and 2015, the population increased at a rate of 3.5%, household income grew at a modest rate of 2.17%, the percentage of people living in poverty increased by 17.5% while median rent increased by 12.26%. Even if the City's development and preservation goals are realized, there is still a growing deficit.

Source of income discrimination

Source of income discrimination significantly contributes to the disproportionate housing needs of protected classes in the City of Los Angeles and the broader region. When landlords have the latitude to reject tenants based on the source of their income, those who rely on governmental assistance become more constrained in their housing options, are barred from neighborhoods where their source of income is not recognized, and can have trouble accessing housing at all. In a competitive rental market like Los Angeles, the effects of this kind of discrimination are particularly acute in LA.

While the vast majority of census tracts in the City contain fewer than 50 households that rely on Section 8 Housing Choice Vouchers, census tracts with the highest concentrations of households receiving voucher assistance are located primarily in majority-minority areas. Also, between 2000 and 2013, the number of households in the City receiving assistance decreased overall, a decline that was almost universal in majority White areas. But, the few areas in which the number of households relying on federal assistance rose were mostly in majority-minority neighborhoods. Because these majority-minority areas disproportionately serve the needs of Housing Choice Voucher holders, those areas are overburdened and lack the stock to meet the needs of the community on their own, potentially contributing to overcrowding.

Although California does have a law that bans source of income discrimination, in 2010 in *Sabi v. Sterling*, the California Court of Appeal for the Second District interpreted the law to not cover discrimination against households using Section 8 or Housing Choice Vouchers. The rental listings on Craigslist sharply illustrate the impact of that decision; one search reveals more than 75 rental listings in LA that specifically note that Section 8 applicants are not welcome and about 300 ads of this kind in the county at-large.

The California State Senate has a bill pending (SB 1053) that would protect tenants who rely on Section 8 vouchers, but it has not passed yet. Elsewhere in California, Santa Clara County has banned Section 8 discrimination in its unincorporated areas, Santa Monica has passed a law prohibiting the practice in City limits, and San Jose is considering a similar measure. However, the City of Los Angeles has no such protections in place today although there have been ongoing discussions.

Other

Tenant Protections

Thousands of residents are displaced annually due to evictions. According to the LA Superior Court, 55,160 eviction actions were filed in LA County in 2016. In past years, that figure has surpassed 72,000. These numbers do not take into account tenants that have other types of problems including illegal lock outs, illegal utility terminations, notices to quit, severe breaches of warranty of habitability leading to “slum” conditions, and discrimination cases. The Eviction Defense Network (EDN) reports a sharp increase in actions by landlords to force tenants to move out and landlords seeking civil harassment restraining orders with “move out” orders rather than filing eviction actions.

Per tenants’ rights advocates, many evictions occur because tenants do not understand their rights and/or their obligations and because they lack representation even though California’s Sargent Shriver Civil Counsel Act provides low-income tenants free legal representation in all eviction matters, including nonpayment of rent. In 2016, existing services met just under 13% of the needs of tenants facing eviction, leaving an “access to justice” gap of 87%. This is a marked improvement from 2002 when 72,000 evictions were filed and 1300 households were represented, leaving an access to justice gap of more than 98%. This decrease in the number of filings is likely the result of increased representation; New York City had a similar experience as representation increased.

The Inner City Law Center estimates that 98% of tenants who go to court without representation lose, even when they have a viable defense. On the other hand, studies have found that evictions decrease by 77% when tenants have access to a lawyer.[1] The Inner City Law Center reports that, of the clients it represents, 42% defeat eviction and 58% negotiate a “soft landing” where clients settle with a transition plan to ensure stability. Eviction Defense Network (EDN) also reports that, while in previous years 96-99% of its clients settled with a transition plan that ensured stability to the household, in the first quarter of 2017, 87% of the EDN caseload was waiting for a trial assignment rather than settling. This dramatic shift is the result of acutely escalating rents in the last quarter of 2016 which is forcing tenants to fight to remain in their units.

Although the Sargent Shriver Civil Counsel Act expanded resources for eviction defense in Los Angeles, the level of state funding provided is not sufficient to ensure that representation is a right that can be fulfilled on demand. Legal services providers in Los Angeles do not currently have the resources to guarantee representation to every income-eligible tenant involved in an eviction proceeding. Measure H funding for homelessness prevention can be used for outreach, education, and tenant legal representation in eviction

proceedings. Further, pending the identification of funding resources, low to moderate-income tenants could receive access to reduced-cost eviction defense attorney, regardless of whether they live in public housing, subsidized housing, or any other type of housing.

Violations of the Rent Stabilization Ordinance

Violations of the Rent Stabilization Ordinance are a significant contributing factor to disproportionate housing needs. HCIDLA's Regulatory Compliance and Code Bureau enforces the City's Rent Stabilization Ordinance (RSO), which prevents landlords from raising their tenants' rent to an excessive degree or engaging in abusive conduct to get tenants to leave in order to be able to raise rents once a unit is vacant. Violations of the RSO can increase housing cost burden and threaten housing stability. The Bureau reports investigation and enforcement data from five districts: East, South, Wilshire, Valley, and West. The East district matches the East Los Angeles Area, the Wilshire district matches the Central Area, and the West district matches the West Los Angeles Area. The Valley district consists of both the North and South Valley Areas, and the South district consists of both the South Los Angeles and Harbor Areas. As the table below shows, there are significant differences in the total populations of these districts so absolute differences in the number of rent stabilization complaints do not mirror per capita differences.

Rent Stabilization Open Cases by District, April 2017

District	Total Population ¹⁹⁷	Total Open Cases	Open Cases Per 100,000 People
East	393,645	224	56.9
South	928,516	715	77.0
Wilshire	656,340	583	88.8
Valley	1,462,262	367	25.1
West	421,445	121	28.7

This data is consistent with the possibility of racial, ethnic, and national origin disparities in the incidence of violations of the RSO. The Valley and West districts, which are the most heavily non-Hispanic White parts of the City, have by far the lowest rates of open cases. The East, South, and Wilshire districts, which are much more heavily minority, have much higher rates of open cases. The especially high rate of open cases in the Wilshire district may reflect higher concentrations of rental housing than in East and South LA along with greater gentrification pressures that incentivize landlords to break the law.

¹⁹⁷ 2010-2014 American Community Survey, Five-Year Estimates.

C. Publicly Supported Housing

Publicly Supported Housing Demographics

Are certain racial/ethnic groups more likely to be residing in one program category of Publicly Supported Housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?

With respect to race and ethnicity, Blacks are the group most over-represented in Publicly Supported Housing in Los Angeles. Blacks are overrepresented in all four types of Publicly Supported Housing. Whites are overrepresented in Other HUD Multifamily. Hispanics are overrepresented in Public Housing, and Asians or Pacific Islanders are overrepresented in Project Based Section 8 and Other HUD Multifamily.

Table 1 provides demographic information on residents living in Publicly Supported Housing in Los Angeles. The demographics are presented by race and ethnicity and categorized into four housing types.

Public Housing

With respect to race and ethnicity, Hispanics are the predominant group residing in Public Housing in the City of Los Angeles. When compared to the overall demographics of Los Angeles, Hispanics represent 47.7% of the City's population¹⁹⁸ but represent 70.90% of the households in Public Housing. Blacks are another group that is overrepresented in Public Housing. Blacks comprise 8.8% of the City's population yet represent 24.7% of the households in Public Housing. Asians and Whites are 11.3% and 27.8% of the City's population and are both underrepresented at 2.9% and 1.5%, respectively.

The Public Housing wait list remains open and the increase in Latino representation in that program is reflective of the increase in Hispanic in the overall City population.

Of the occupied Public Housing units in the City of Los Angeles, 4,690 of the 6,819 (68.7%) are in R/ECAPs while only 9.75% of the City's 3,976,322 residents, or, 387,871 residents, reside in R/ECAPs.

Project Based Section 8

With respect to race and ethnicity, Asians are the predominant group residing in Project Based Section 8 housing in Los Angeles. When compared to the overall demographics of Los Angeles, Asians represent 11.3% of the City's population, but occupy 31.56% of the Project Based Section 8 units. Blacks are another group that is overrepresented in Project Based Section 8. Blacks are 8.8% of the City's population yet occupy 19.02% of the Project Based Section 8 units. Hispanics and Whites are 47.7% and 27.8% of the City's population, respectively, and are both underrepresented in Project Based Section 8 at 27.66% and 21.58%.

The over-representation of Asians in the Project Based Section 8 program is primarily explained by the fact that the majority of these buildings serve seniors and/or persons with disabilities. Many of the elderly immigrants from the mid-1980s applied for this program and subsequently became admitted as many of these buildings are located in or near areas where these immigrant communities settled (Union Tower and Independent Square are close to Koreatown while Owensmouth Gardens and Las Palmas are close to Russian/Armenian communities in the West San Fernando Valley and Hollywood for example).

¹⁹⁸ U.S. Census Bureau, https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml?src=bkml, Accessed August 03, 2017

In the City of Los Angeles, 3,445 of its 20,351 (16.9%) Project Based Section 8 units are located in R/ECAPs.

Other Multifamily

With respect to race and ethnicity, Asians are the predominant group residing in Other Multifamily housing in Los Angeles. When compared to the overall demographics of Los Angeles, Asians represent 11.3% of the City's population but 35.87% of the residents in Other Multifamily.

Whites represent another group that are overrepresented in Other Multifamily. Whites are 27.8% of the City's population yet comprise 30.13% of the residents of Other Multifamily.

Blacks are 8.8% of the City's population and 9.92% of the residents of Other Multifamily.

Hispanics are 47.7% of the City's population and are under-represented in Other Multifamily at 23.8% of occupants.

In the City of Los Angeles, 647 of its 2,838 (22.8%) Other Multifamily units are located in R/ECAPs.

Housing Choice Voucher (HCV)

With respect to race and ethnicity, Blacks are the predominant group residing in HCV-assisted units in Los Angeles. When compared to the overall demographics of Los Angeles, Blacks represent 8.8% of the City's population but 53.89% of the residents with HCVs. Asians, Hispanics and Whites are 11.3%, 47.7% and 27.8% of the City's population and are all underrepresented in the HCV program at 2.76%, 21.06%, and 22.1%, respectively.

The over-representation of the Blacks in the HCV program is a reflection of historic housing events and immigrant housing trends. At the time the HCV wait list last opened in 1992 (and closed in 2004) many of the people who initially got on the list were African Americans who already resided in the City and who were familiar with Publicly Supported Housing programs. As such, they were initially over represented on the wait list and subsequently the program. Applications from the Russian and Armenian communities also began to increase in the early 1990s.

As of June 30, 2017, in the City of Los Angeles, 8,103 of its 45,294 (17.9%) Housing Choice Vouchers are utilized in R/ECAPs.

Table 6 Publicly Supported Households by Race/Ethnicity

Table 6 - Publicly Supported Households by Race/Ethnicity								
	Race/Ethnicity							
(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	104	1.53%	1684	24.70%	4833	70.88%	198	2.90%
Project-Based Section 8	4,382	21.58%	3,863	19.02%	5,617	27.66%	6,409	31.56%
Other Multifamily	851	30.13%	280	9.92%	672	23.80%	1,013	35.87%
HCV Program	9,449	22.10%	23,039	53.89%	9,005	21.06%	1,178	2.76%
Total Households	510,140	38.62%	146,570	11.10%	471,240	35.67%	162,019	12.27%
0-30% of AMI	73,675	25.53%	47,200	16.35%	126,635	43.88%	34,589	11.98%
0-50% of AMI	112,300	22.83%	70,530	14.34%	232,130	47.19%	54,289	11.04%
0-80% of AMI	181,610	25.11%	96,015	13.27%	338,220	46.76%	79,799	11.03%
(Los Angeles-Long Beach-Anaheim, CA)	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	1,094	9.27%	3,183	26.97%	7,054	59.78%	463	3.92%
Project-Based Section 8	10,079	23.58%	7,718	18.06%	12,145	28.41%	12,640	29.57%
Other Multifamily	1,851	33.56%	488	8.85%	1,242	22.52%	1,926	34.92%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	1,766,510	41.80%	333,080	7.88%	1,405,070	33.25%	629,349	14.89%
0-30% of AMI	215,775	29.59%	86,225	11.83%	305,885	41.95%	105,314	14.44%
0-50% of AMI	343,565	26.07%	135,740	10.30%	587,685	44.60%	175,814	13.34%
0-80% of AMI	590,895	28.77%	195,155	9.50%	905,370	44.09%	272,549	13.27%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: Numbers presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).								
Note 4: The source of the Project-Based Section 8, Other Multifamily and HCV Program data is HUD Table 6, which provides data on households. The source for the Public Housing data is the Housing Authority of the City of Los Angeles (HACLA). Note that the HACLA data was prepared to be consistent with HUD's methodology whereby Hispanic is designated as a separate category along with White, Black, and Asian or Pacific Islander.								

Table 7 R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category								
(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	4,690	1.30%	27.90%	68.40%	2.40%	59.11%	20.66%	20.23%
Non R/ECAP tracts	2,129	1.97%	17.61%	76.37%	4.04%	49.98%	27.11%	22.91%
Project-based Section 8								
R/ECAP tracts	3,445	8.33%	27.19%	29.92%	34.30%	18.70%	61.81%	10.53%
Non R/ECAP tracts	16,906	24.28%	17.35%	27.19%	31.00%	13.07%	69.71%	13.49%
Other Multifamily								
R/ECAP tracts	647	5.80%	23.04%	39.03%	32.13%	0.00%	94.94%	7.21%
Non R/ECAP tracts	2,191	38.24%	6.09%	18.51%	36.78%	0.30%	82.49%	19.91%
HCV Program								
R/ECAP tracts	8,103	7.45%	67.93%	20.41%	3.97%	32.94%	26.64%	31.99%
Non R/ECAP tracts	37,191	25.33%	50.81%	21.20%	2.49%	25.99%	35.84%	37.93%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: Numbers presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).								
Note 4: The source of the Project-Based Section 8, Other Multifamily and HCV Program data is HUD Table 6, which provides data on households. The source for the Public Housing data is the Housing Authority of the City of Los Angeles (HACLA). Note that the HACLA data was prepared to be consistent with HUD’s methodology whereby Hispanic is designated as a separate category along with White, Black, and Asian or Pacific Islander.								

Compare the racial/ethnic demographics of each program category of Publicly Supported Housing for the jurisdiction to the demographics of the same program category in the region.

Los Angeles-Long Beach-Anaheim Region (Region)

In the region, White households are more heavily represented in Public Housing, Project Based Section 8, and Other Multifamily than in the City of Los Angeles. However, White households are still underrepresented in the region across three types of Publicly Supported Housing (Public Housing, Project Based Section 8, and Other Multifamily). The regional patterns for Whites are consistent with those in the City. Regional data is not available for HCV.

In the region, Black households are more heavily represented in Public Housing than in the City of Los Angeles and less represented in Project Based Section 8 and Other Multifamily than in the City. Overall, Black households are overrepresented in the region across three types of Publicly Supported Housing (Public Housing, Project Based Section 8 and Other Multifamily). The regional patterns for Blacks are consistent with those in the City. Regional data is not available for HCV.

In the region, Hispanic households are slightly less represented in Public Housing and Other Multifamily than in the City of Los Angeles and slightly more represented in Project Based Section 8 than in the City. Overall, Hispanic households are overrepresented in Public Housing and underrepresented in Project Based Section 8 and Other Multifamily in the Region. The regional patterns for Hispanics are consistent with those in the City. Regional data is not available for HCV.

In the region, Asian households are underrepresented in Public Housing and overrepresented in Project Based Section 8 and Other Multifamily assisted developments. The regional patterns for Asians are consistent with those in the City. Regional data is not available for HCV.

Table 6 Publicly Supported Households by Race/Ethnicity

Table 6 - Publicly Supported Households by Race/Ethnicity								
	Race/Ethnicity							
(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type	#	%	#	%	#	%	#	%
Public Housing	104	1.53%	1684	24.70%	4833	70.88%	198	2.90%
Project-Based Section 8	4,382	21.58%	3,863	19.02%	5,617	27.66%	6,409	31.56%
Other Multifamily	851	30.13%	280	9.92%	672	23.80%	1,013	35.87%
HCV Program	9,449	22.10%	23,039	53.89%	9,005	21.06%	1,178	2.76%
Total Households	510,140	38.62%	146,570	11.10%	471,240	35.67%	162,019	12.27%
0-30% of AMI	73,675	25.53%	47,200	16.35%	126,635	43.88%	34,589	11.98%
0-50% of AMI	112,300	22.83%	70,530	14.34%	232,130	47.19%	54,289	11.04%
0-80% of AMI	181,610	25.11%	96,015	13.27%	338,220	46.76%	79,799	11.03%
(Los Angeles-Long Beach-Anaheim, CA)	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type	#	%	#	%	#	%	#	%
Public Housing	1,094	9.27%	3,183	26.97%	7,054	59.78%	463	3.92%
Project-Based Section 8	10,079	23.58%	7,718	18.06%	12,145	28.41%	12,640	29.57%
Other Multifamily	1,851	33.56%	488	8.85%	1,242	22.52%	1,926	34.92%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	1,766,510	41.80%	333,080	7.88%	1,405,070	33.25%	629,349	14.89%
0-30% of AMI	215,775	29.59%	86,225	11.83%	305,885	41.95%	105,314	14.44%
0-50% of AMI	343,565	26.07%	135,740	10.30%	587,685	44.60%	175,814	13.34%
0-80% of AMI	590,895	28.77%	195,155	9.50%	905,370	44.09%	272,549	13.27%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
Note 2: Numbers presented are numbers of households not individuals.								
Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).								
Note 4: The source of the Project-Based Section 8, Other Multifamily and HCV Program data is HUD Table 6, which provides data on households. The source for the Public Housing data is the Housing Authority of the City of Los Angeles (HACLA). Note that the HACLA data was prepared to be consistent with HUD's methodology whereby Hispanic is designated as a separate category along with White, Black, and Asian or Pacific Islander.								

Table 7 R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category								
(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	4,690	1.30%	27.90%	68.40%	2.40%	59.11%	20.66%	20.23%
Non R/ECAP tracts	2,129	1.97%	17.61%	76.37%	4.04%	49.98%	27.11%	22.91%
Project-based Section 8								
R/ECAP tracts	3,445	8.33%	27.19%	29.92%	34.30%	18.70%	61.81%	10.53%
Non R/ECAP tracts	16,906	24.28%	17.35%	27.19%	31.00%	13.07%	69.71%	13.49%
Other Multifamily								
R/ECAP tracts	647	5.80%	23.04%	39.03%	32.13%	0.00%	94.94%	7.21%
Non R/ECAP tracts	2,191	38.24%	6.09%	18.51%	36.78%	0.30%	82.49%	19.91%
HCV Program								
R/ECAP tracts	8,103	7.45%	67.93%	20.41%	3.97%	32.94%	26.64%	31.99%
Non R/ECAP tracts	37,191	25.33%	50.81%	21.20%	2.49%	25.99%	35.84%	37.93%
Note 1: Data Sources: Decennial Census; APSH; CHAS								
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Compare the demographics, in terms of protected class, of residents of each program category of Publicly Supported Housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of Publicly Supported Housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Table 5 provides data on the number of households that meet income eligibility requirements for Publicly Supported Housing. The data is sorted by race and ethnicity and categorized by Area Median Income (AMI) groupings of 0-30% AMI, 0-50% AMI, and 0-80% AMI.

By adding the total number of residents eligible for Publicly Supported Housing (0-80% of AMI) in the chart below, 713,710 households are income-eligible for Publicly Supported Housing. The chart illustrates that a lower percentage of Whites are eligible for Publicly Supported Housing than the overall percentage of White households in the City. Blacks comprise a higher percentage of Publicly Supported Housing-eligible households than their overall percentage of households in the City. A smaller percentage of Hispanics are eligible for Publicly Supported Housing than the percentage of the City’s overall number of Hispanic households. The percentage of Asians or Pacific Islanders eligible for Publicly Supported Housing equals their overall percentage of households in the City.

Of the households that are income eligible, Whites are overrepresented in Other Multifamily; Blacks are overrepresented in Public Housing, Project Based Section 8, and the HCV Program; Hispanics are overrepresented in Public Housing; and Asian or Pacific Islanders are overrepresented in Project Based Section 8 and Other Multifamily.

Table 6 Publicly Supported Households by Race/Ethnicity

Table 6 - Publicly Supported Households by Race/Ethnicity								
(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	104	1.53%	1684	24.70%	4833	70.88%	198	2.90%
Project-Based Section 8	4,382	21.58%	3,863	19.02%	5,617	27.66%	6,409	31.56%
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Table 7: R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category								
(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% Asian or Pacific Islander			% Families with children		% with a disability	
		% White	% Black	% Hispanic	% Elderly	% with a disability		
Public Housing								
R/ECAP tracts	4,690	1.30%	27.90%	68.40%	2.40%	59.11%	20.66%	20.23%
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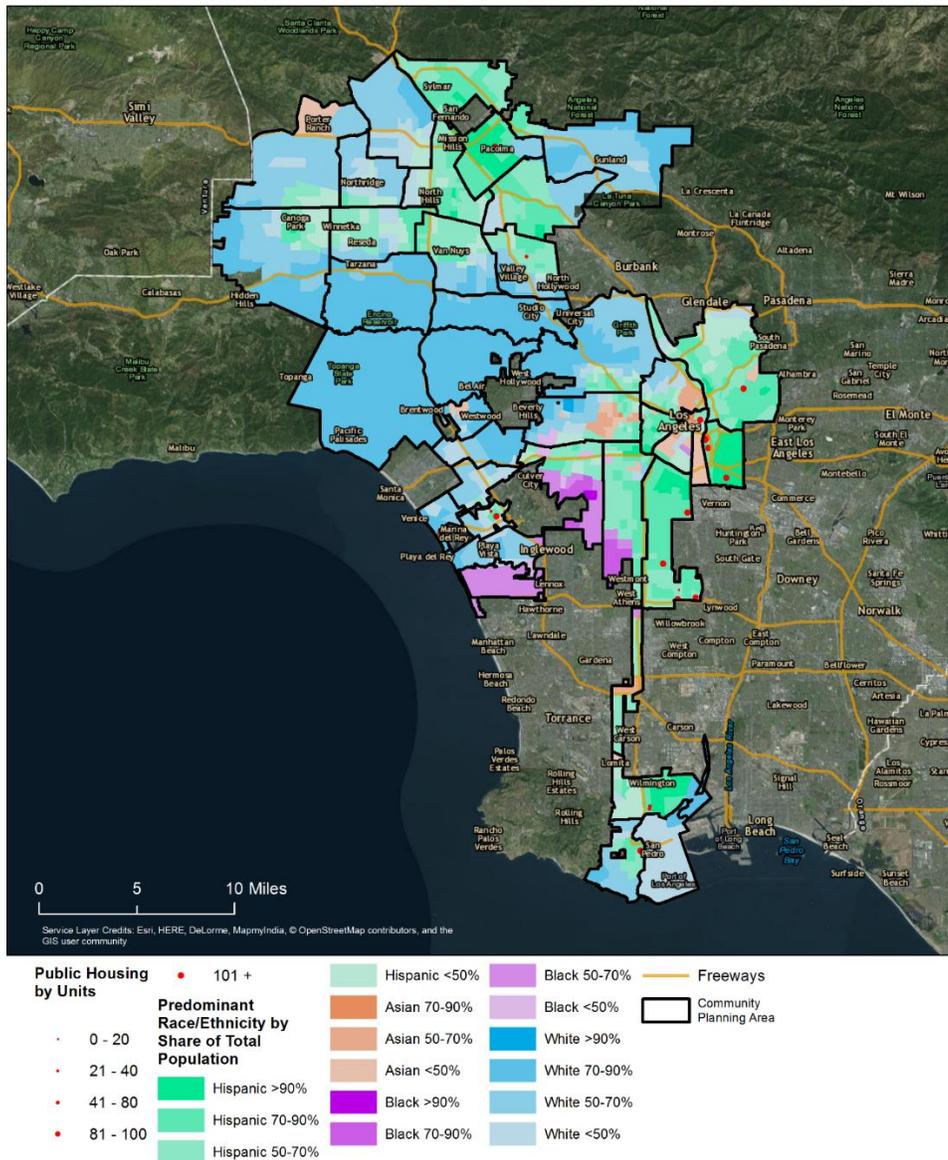
Publicly Supported Housing Location and Occupancy

Describe patterns in the geographic location of Publicly Supported Housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

Map 1 – Public Housing with Race/Ethnic Legend, below, depicts the location of Public Housing in Los Angeles. The overlay in Map 1 shows that Public Housing is largely located in segregated, predominantly Hispanic and Black neighborhoods. The data also shows that Public Housing is frequently located either within or in close proximity to R/ECAPs. Map 1 shows minimal overlay of Public Housing outside of Central and South LA.

Map 1

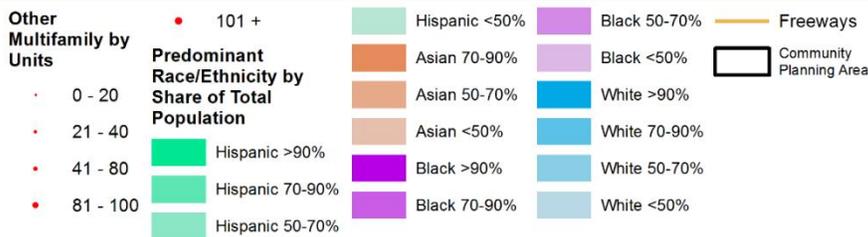
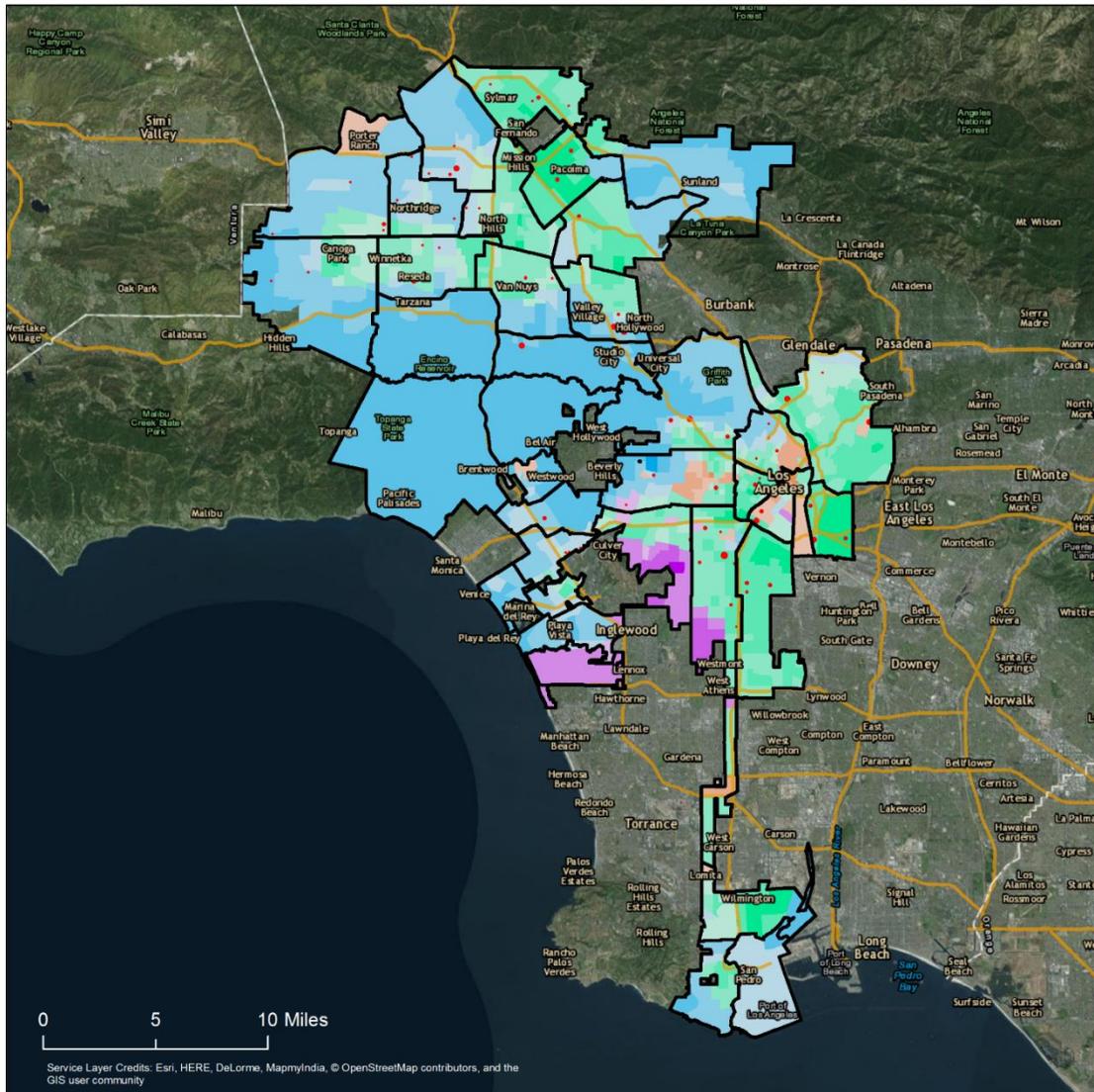
City of L.A. AFH: Public Housing Developments by Number of Units and Race and Ethnicity in 2010



Map 2 – Other Multifamily with Race/Ethnic Legend, below, depicts the location of Other Multifamily in Los Angeles. The overlay in Map 2 shows that, unlike Public Housing, Other Multifamily is more dispersed throughout the City including neighborhoods with high percentages of White and Asian or Pacific Islander residents. Map 2 shows no Other Multifamily between the southern end of South LA to the Port of LA.

Map 2

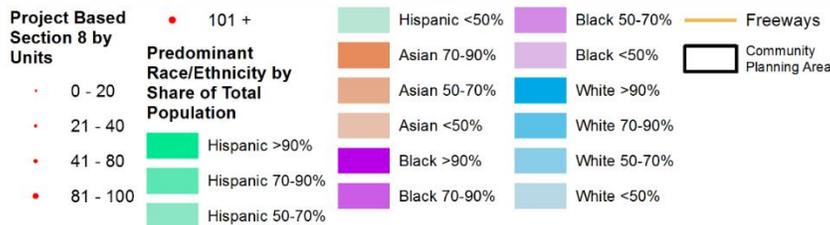
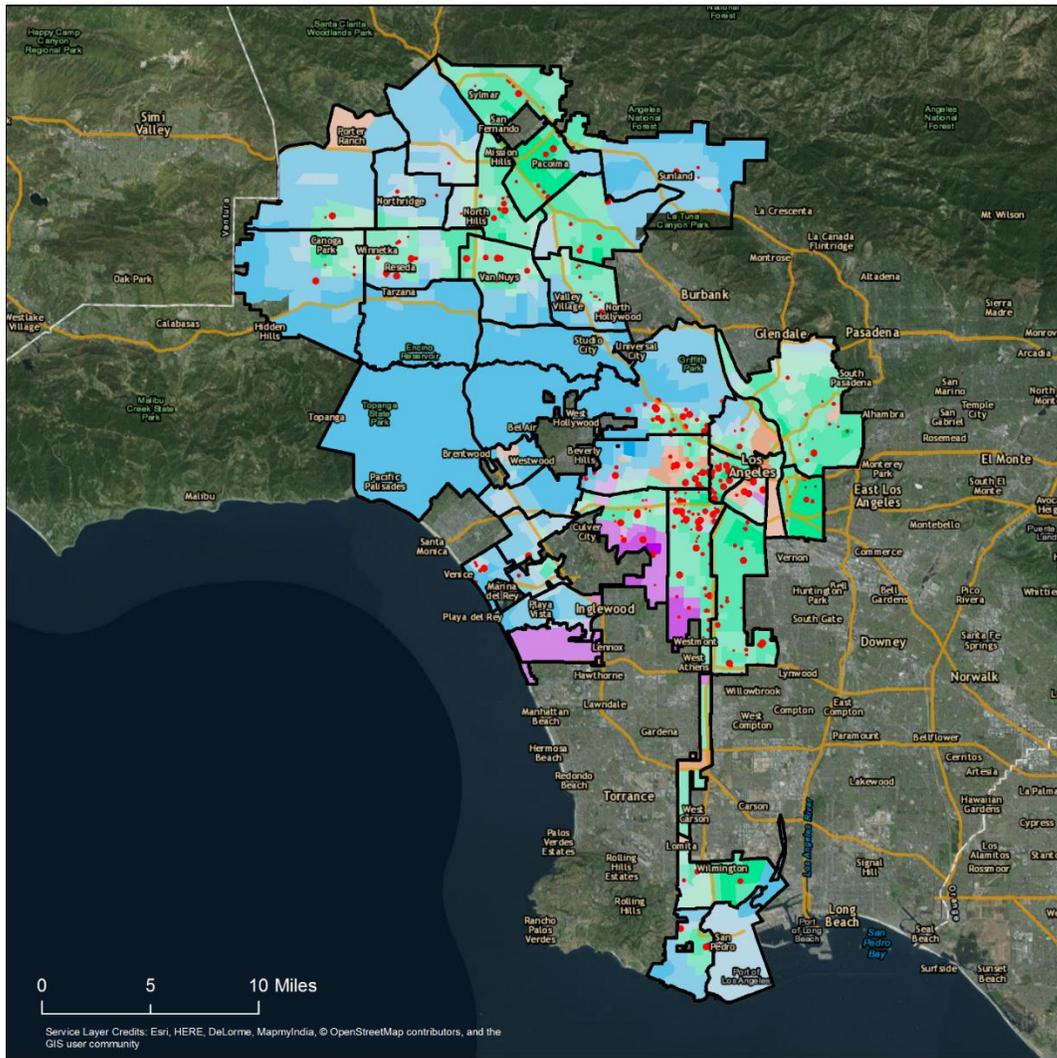
City of L.A. AFH: Other HUD Multifamily Developments by Number of Units and Race and Ethnicity in 2010



Map 3 – Project-Based Section 8 with Race/Ethnic Legend, below, depicts the location of Project-Based Section 8 housing in Los Angeles. The overlay in Map 3 shows that Project-Based Section 8 is largely located in the central part of the City where there are segregated, predominantly Hispanic and Black neighborhoods and in the northern part of the City where there are large concentrations of Whites, Hispanics, and Asian or Pacific Islanders. Map 3 shows some overlay of Project-Based Section 8 housing in South LA but there is a swath of the City through West Van Nuys, Encino, Tarzana, Westwood, West Los LA, Brentwood, and Pacific Palisades without any Project-Based Section 8 units.

Map 3

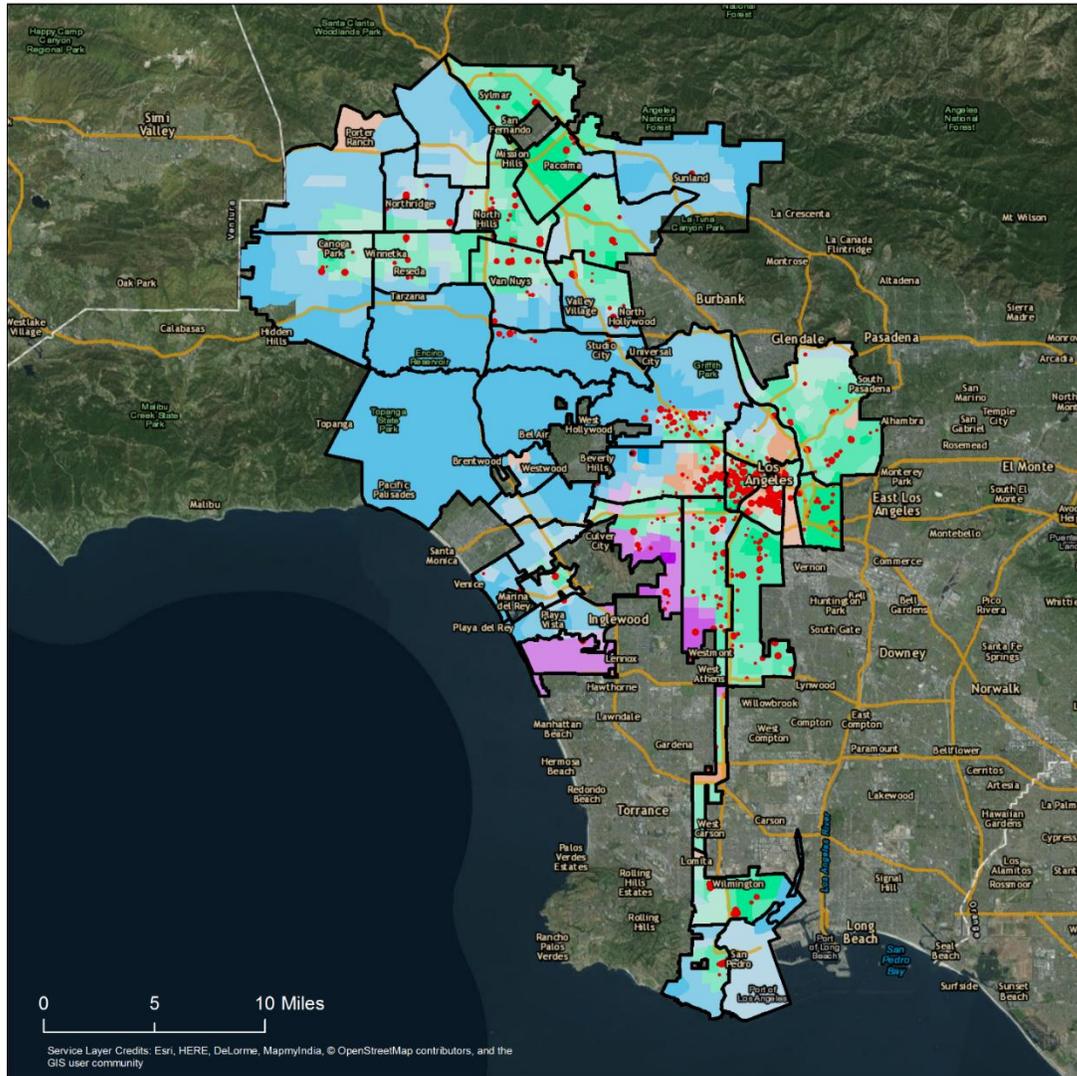
City of L.A. AFH: Project-Based Section 8 Developments by Number of Units and Race and Ethnicity in 2010



Map 4 – Low Income Housing Tax Credit with Race/Ethnic Legend, below, depicts the location of Low Income Housing Tax Credit (LIHTC) properties in Los Angeles. The overlay in Map 4 shows that LIHTC is largely located in segregated, predominantly Hispanic, Asian, and Black neighborhoods. The data also shows that LIHTC is frequently located either within or in close proximity to R/ECAPs. Map 4 shows minimal overlay of LIHTC in West Van Nuys, Encino, Tarzana, Westwood, West LA, Brentwood, and Pacific Palisades.

Map 4

City of L.A. AFH: LIHTC Developments by Number of Units and Race and Ethnicity in 2010

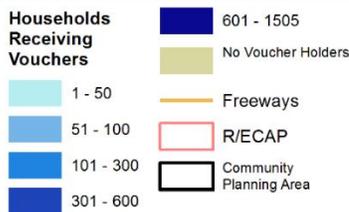
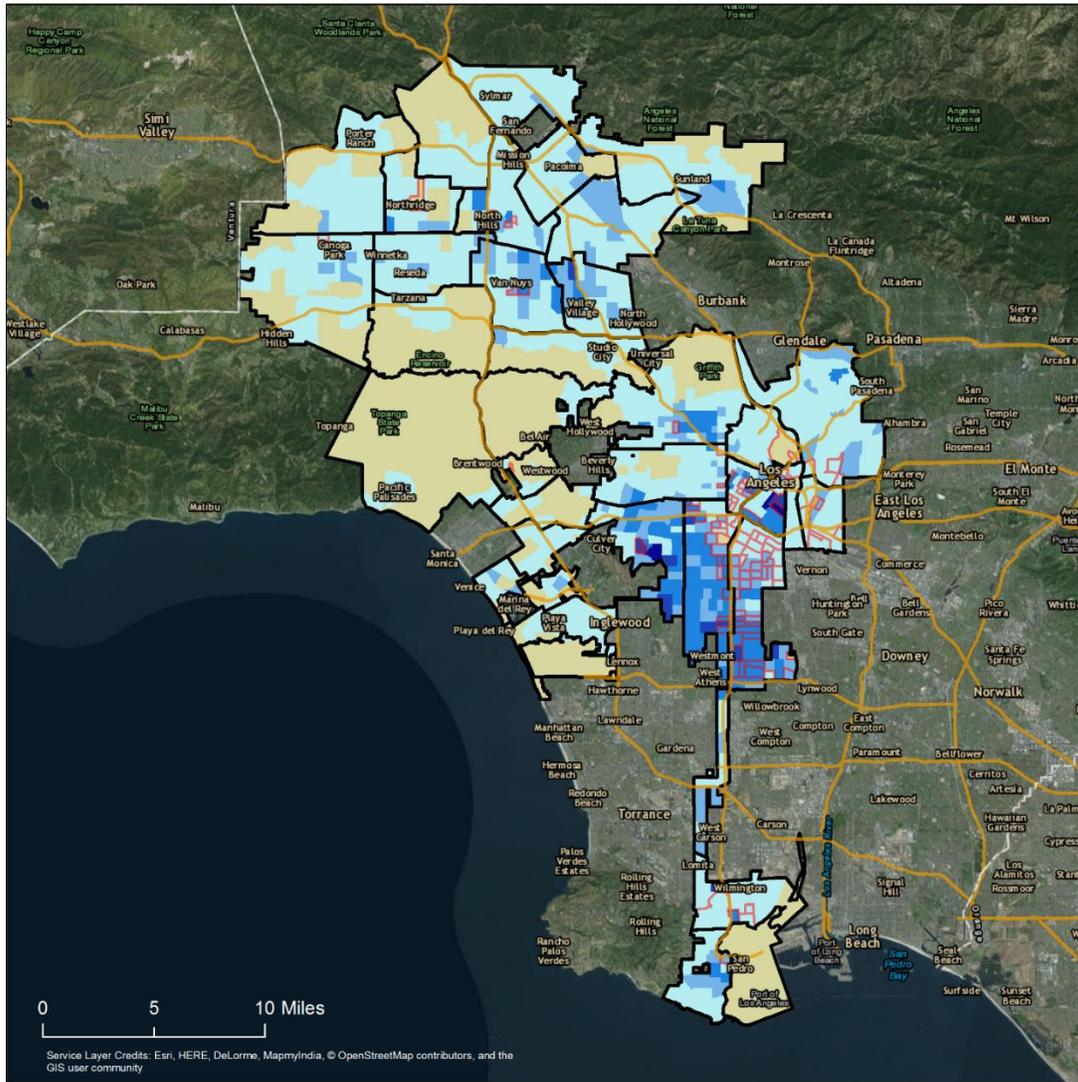


LIHTC by Units	Predominant Race/Ethnicity by Share of Total Population	Asian 70-90%	Black <50%	Community Planning Area
• 0 - 20	Hispanic >90%	Asian 50-70%	White >90%	
• 21 - 40	Hispanic 70-90%	Asian <50%	White 70-90%	
• 41 - 80	Hispanic 50-70%	Black >90%	White 50-70%	
• 81 - 100	Hispanic <50%	Black 70-90%	White <50%	
• 101 +		Black 50-70%		Freeways

Map 5 – Housing Choice Voucher Percentage with Race/Ethnic Legend, below, depicts the percentage of Housing Choice Voucher Program (HCV) usage in Los Angeles by Census Tract. The overlay in Map 5, demonstrated by shading, shows that HCV usage is largely located in segregated, predominantly Black neighborhoods on the western side of the central part of the City. The data also shows HCV usage in a few Census Tracts in the far northern part of the City. Map 5 shows low utilization of HCV in the western half and far south edge of Los Angeles.

Map 5

City of Los Angeles: Number of Households Receiving Housing Choice Vouchers



Describe patterns in the geographic location for Publicly Supported Housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

Table 7 shows that a higher percentage of families with children living in Public Housing, Project-Based Section 8, and HCV-assisted units reside in R/ECAPs than non-R/ECAPs. It shows that more elderly households in Other HUD Multifamily live in R/ECAPs than non-R/ECAPs, but that more elderly households live in Public Housing, Project-Based Section 8, and HCV-assisted units in non-R/ECAPs than R/ECAPs. Across all four Publicly Supported Housing programs, households with a member with a disability reside more in non-R/ECAPs than in R/ECAPs.

Table 7 R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

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How does the demographic composition of occupants of Publicly Supported Housing in R/ECAPs compare to the demographic composition of occupants of Publicly Supported Housing outside of R/ECAPs in the jurisdiction and region?

68.7% of HACLA's Public Housing portfolio is located in R/ECAPs. The number of Public Housing units in R/ECAPs (4,690) outnumbers the units located in non-R/ECAP tracts (2,129). When considering Map 5 - Publicly Supported Housing and Race/Ethnicity, there is a high concentration of R/ECAPs found in Downtown LA into East LA and continuing down into South LA. There is also a smaller set of R/ECAPs existing in the Harbor area, near San Pedro and Long Beach. The number of Public Housing units is consistent with the areas that have a high R/ECAP concentration. There is a higher percentage of Hispanic population in both R/ECAP and non-R/ECAP tracts in Public Housing than any other category. There is a slightly higher percentage of Hispanics residing in Public Housing that live outside of R/ECAPs (76.37%) than in them (68.4%). More than half (59.11%) of those living within R/ECAP tracts are families with children. The small percentage of the White population living both in public housing and R/ECAPs (1.3%) is consistent with the White population represented in Map 5, which shows a higher

percentage of the White population residing in West LA, Hollywood, and North Hollywood areas. There is one Public Housing property, Mar Vista Gardens, available in West LA and a very small amount in the San Fernando Valley. There is a larger percentage of Blacks found living in Public Housing units located in R/ECAP tracts (27.9%) than living in non-R/ECAPs (17.6%) but this is not the case for the elderly population, which had a higher percentage of residents outside of R/ECAPs (27.11%) than in them (20.66%). Hispanics with families represent a firm majority of the residents of Public Housing units and, more specifically, Public Housing units located in R/ECAPs.

There are 2.89 times as many Project-Based Section 8 units (20,351) than Public Housing units (7,052). The highest concentrations of Project-Based Section 8 units are found in Central LA, Koreatown, Chinatown, and parts of South LA. The elderly represent a majority of residents of Project-Based Section 8 units in R/ECAP (61.81%) and non-R/ECAP (69.71%) tracts. When comparing the Black, Hispanic, and Asian/Pacific Islander populations found in both Project-Based Section 8 units and R/ECAPs, the percentages are similar. The Asian/Pacific Islander population occupied a plurality over the other two groups (34.3%) followed by Hispanics (29.92%) and closely after that Blacks (27.19%). Persons with disabilities reside in both R/ECAP (10.53%) and Non-R/ECAP (13.49%) tracts at similar rates. There is a significantly higher percentage of Whites using Project-Based Section 8 units in non-R/ECAP (24.28%) tracts than in R/ECAP (8.33%) tracts.

Other HUD Multifamily units are more widely distributed than the Public Housing and Project-Based Section 8 categories, but there are groupings of Other HUD Multifamily units in West LA, East LA (into parts of South LA), as well as Chinatown. There is an overwhelming majority of elderly residents in Other HUD Multifamily units in both R/ECAPs (94.94%) and Non-R/ECAPs (82.49%). Asian/Pacific Islanders follow with (32.13%) of the Other HUD Multifamily units in R/ECAPs and 36.78% of the units in non-R/ECAPs. The Black population makes up a smaller percentage of this category (23.04%) located in R/ECAPs and (6.09%) in non-R/ECAPs. White residents occupy 6.6 times more units of Other HUD Multifamily units located in non-R/ECAP (38.24%) tracts than those units located in R/ECAPs (5.8%). This is consistent with Map 5's representation of the White population, where the majority of the population lives in areas where there are fewer Other HUD Multifamily units than in areas where minorities are the majority. The elderly and Asian/Pacific Islander groups appear to be the most overrepresented groups in Other HUD Multifamily housing than other protected classes.

Blacks represent a clear majority of HCV holders. Within the Black population participating in the HCV program, there is a higher percentage in R/ECAPs (67.93%) than non-R/ECAP areas (50.81%). Hispanics hold a significantly lower percentage of HCVs in R/ECAPs (20.41%) and non-R/ECAPs (21.20%). The elderly hold 26.64% HCVs in R/ECAP tracts and 35.84% in non-R/ECAPs while persons with disabilities hold 31.99% of the HCVs in R/ECAP tracts and 37.93% in non-R/ECAPs. Asian/Pacific Islander and White populations hold much lower percentages of the HCVs. Asian/Pacific Islanders hold 3.97% in R/ECAP locations and even less in non-R/ECAPs (2.49%) while the White Population has 7.45% of the HCVs in R/ECAP tracts and much more in non-R/ECAPs (25.33%).

(A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

Jordan Downs is the only property in HACLA's portfolio converting under the RAD program. The property is 99% Hispanic and Black (60% - Hispanic, 39% - Black). Families with children comprise 74% of the households in Jordan Downs, giving it the second highest percentage of families with children in the Public Housing portfolio. However, the development with the highest concentration of families with children is Wilmington Townhomes at 93%, contains 46 units compared to 714 units at Jordan Downs.

Compare the demographics of occupants of developments in the jurisdiction, for each category of Publicly Supported Housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

The majority of Public Housing is found in Central, South, and East LA. There is also a smaller set of Public Housing developments in the Harbor area in the communities of San Pedro and Wilmington. A small amount of Public Housing exists on the Westside in the Del Rey community as well in the Pacoima community of the San Fernando Valley. There is a high concentration of Hispanic population in areas where Public Housing developments are located. When viewing the demographics within individual Public Housing developments in Central, East, and South LA, the percentages of Hispanic households in the properties are very high (90-99%). This matches the high percentages of Hispanic households in the surrounding census tracts. The Hispanic majority is a constant pattern for most of the public housing developments. The majority of the White population resides in West LA, Hollywood, and the Valley. There is one Public Housing property, Mar Vista Gardens, in West LA and a very small amount in the Valley, consistent with the small percentage (1.5%) of Whites residing in Public Housing. Public Housing also serves a high percentage of families with children. Overall Hispanics, particularly Hispanic families with children, are a majority of Public Housing residents.

A very high concentration of Project-Based Section 8 units are found in Central LA, including Koreatown and Chinatown, as well as in parts of South LA. As the Project-Based Section 8 units have wider distribution throughout areas of high concentrations of Black, Hispanic, and Asian/Pacific Islander populations, the percentages of these groups using Project-Based Section 8 units are consistent and similar. The elderly occupy the majority of Project-Based Section 8 units. The Black population reside in a slight plurality over Hispanics, who are followed closely by Asian/Pacific Islanders. There are properties in South LA where the Black population predominates more dramatically. Koreatown and Chinatown are both heavily populated by Asian/Pacific Islanders, and they occupy the majority of the Project-Based Section 8 units in those neighborhoods.

Other HUD Multifamily units are found in areas of north and central San Fernando Valley, North Hollywood, Downtown LA, and South LA. A small amount of Other HUD Multifamily units exist along the coast near Marina Del Rey and Santa Monica. The elderly and Asian/Pacific Islander occupy a greater

percentage of Other HUD Multifamily units than Whites, Hispanics, and Blacks. Map 5 shows most of the White population live in areas where fewer Other HUD Multifamily units exist than in areas where minorities are the majority. For several areas in the Valley, Whites constituted a majority or plurality of residents in Other HUD Multifamily units, even though Hispanics were a majority of the population in those census tracts. Other HUD Multifamily units in Santa Monica held an overwhelming White majority, matching the surrounding census tracts, and the same was true with Hispanic households in East LA.

Of HCV program participants, Blacks represent the majority (53.89%). HCV units are located predominately in South LA, Central LA, and parts of North Hollywood in the Valley. The Black population utilizes HCVs twice as much as Public Housing. In North Hollywood, the population is more heavily White and Hispanic than Black. This accounts for the overall higher percentage of Hispanic and White voucher usage in this area. The HCV Program serves persons with disabilities more than any other category of Publicly Supported Housing. Overall, HCV usage is concentrated in areas with high percentages of Black residents.

Disparities in Access to Opportunity

Describe any disparities in access to opportunity for residents of Publicly Supported Housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of Publicly Supported Housing.

Table 8, Opportunity Indicators by Race/Ethnicity, shows that Blacks and Hispanics fair worse in the labor market although they reside in neighborhoods with high access to employment centers. Low income Blacks and Hispanics below the federal poverty level have significantly lower rates of access to opportunity within the labor market. During the Transportation and Jobs focus group meetings, held on January 10th, February 1st, and 22nd, these trends were further confirmed by advocates working with communities on workforce development and jobs placement. During the focus group meeting it was noted that Public Housing residents face many barriers to accessing jobs. Criminal history, lack of resources to buy professional clothes for an interview, and low skills and high illiteracy rates are common barriers faced by Public Housing residents. These barriers are mitigated by programs often located on-site, via the Housing Authority of the City of Los Angeles (HACLA)'s WorkSource Center which provides opportunities for criminal record expungement, criminal record employment, transportation, clothing, job training, job readiness, job placement, education, and mental health resources.

Table 8 Opportunity Indicators by Race/Ethnicity

(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	57.93	62.34	68.23	81.08	82.87	47.55	24.05
Black, Non-Hispanic	27.68	30.48	32.64	85.39	88.08	46.66	14.49
Hispanic	25.84	36.83	32.80	84.89	87.23	43.11	18.78
Asian or Pacific Islander, Non-Hispanic	43.16	53.61	54.13	84.83	87.77	46.90	19.01
Native American, Non-Hispanic	37.48	44.66	45.47	83.58	86.17	46.39	21.26
Population below federal poverty line							
White, Non-Hispanic	46.73	55.61	60.25	85.00	87.84	47.10	19.76
Black, Non-Hispanic	18.53	26.08	24.51	87.01	89.53	45.30	13.69
Hispanic	17.65	33.06	28.17	86.70	89.79	44.56	15.82
Asian or Pacific Islander, Non-Hispanic	34.48	52.96	49.34	88.18	92.15	49.66	13.92
Native American, Non-Hispanic	20.52	35.42	33.38	87.46	91.04	48.99	14.15

HACLA offers services to all residents regardless of the site at which they reside and where certain services may be offered. Access to these services is advertised at all locations and there is staff available at all sites to assist residents. Services offered include case managers, family self-sufficiency, and therapists who can connect individuals to resources to assist in job placement and skill development. Other barriers include not having affordable child care for those who have shift jobs that pay minimum wage, whose work schedules fluctuate based on shifts and are unable to afford childcare due to low wages. HACLA's policies on transfers can also create barriers to accessing employment. If residents secure employment in a different area from where they currently reside, they may request a transfer to a Public Housing location closer to their workplace. Regular routine transfers are on first come basis, depending upon the availability of vacant units of the appropriate bedroom size. Given HACLA's low vacancy rates, however, such transfers are not granted immediately. Priority for transfers is given to those who require a reasonable accommodation or need to be moved due to an emergency health or safety risk.

According to another advocate who attended the meeting, HCV tenants who live in areas with limited public transportation, areas such as West LA and parts of South LA, have additional difficulties accessing education and employment services. Another advocate who works overwhelmingly with Black and Hispanic transgender women pointed out the lack of social services geared toward transgender individuals. Many transgender individuals lack employment history or have long gaps of not working, thus may turn to the underground economy. As a result, many often end up with criminal histories that further isolate them from the mainstream job market. If there are resources geared for the transgender and gender non-binary community, many of those services are reserved for individuals who are HIV positive. With limited services for this population, waiting lists are often long.

Additional Information

Beyond the HUD-provided data, provide additional relevant information, if any, about Publicly Supported Housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

Veteran Homelessness

Los Angeles is home to the highest incidence of veteran homelessness in the United States. According to the 2017 Point-in-Time Homeless Count (PIT), over 4,800 veterans are homeless in LA County.¹⁹⁹ The

¹⁹⁹ 2017 Greater Los Angeles Homeless Count

U.S. Department of Veterans Affairs (“VA”) executed a written agreement with representatives and advocates of homeless veterans promising to end veteran homelessness in the region. The VA’s commitment centered on the revitalization of the 388-acre West LA VA campus, at the corner of Wilshire Blvd. and Sepulveda, with the development of up to 1,200 homes in less than three years for homeless veterans.

Since signing a written agreement over two years ago, which settled the *Valentini v. Shinseki* litigation, the VA has made some progress on its promise of change and revitalization at the West LA VA campus. The agency worked to prepare a Draft Master Plan and began the process of preparing the campus for revitalization into a vibrant, safe, and service-rich veteran community. On June 2017, the grand opening of Building 209 on the West Los Angeles VA Medical Center campus took place. This building is the first project supported by the 500 HUD-VASH Project Based Vouchers allocated by HACLA’s Board of Commissioners for permanent supportive housing projects to serve homeless veterans in existing housing units requiring minimal rehabilitation, from structure types such as motels and hospitals that can be converted to residential use. The 54 units in the building are also the first permanent supportive housing for homeless veterans on the VA campus. The VA has also selected the same developer to complete Phase 2 consisting of 108 units in Buildings 205 and 208. These are expected to be ready for occupancy in early 2019. Although these units will help meet critical needs, this development risks perpetuating the segregation of persons with disabilities, of whom there is a significant overlap with homeless veterans, in settings where there is minimal opportunity for interactions with persons who do not have disabilities.

HACLA Homeless Initiatives

HACLA has committed permanent supportive housing (PSH) assistance to more than 17,200 households including formerly homeless and chronically homeless individuals and families through the following rental assistance subsidy programs:

Waiting List Limited Preference: Homeless Program

The goal of the program is to provide permanent affordable housing for homeless individuals and families while ensuring them access to supportive services to maintain independent living. The Homeless Program’s allocation of 4,111 HCVs targets homeless individuals and families living in transitional housing, emergency shelters, and the streets. HACLA currently works with 19 non-profit and public agency partners located throughout the City of Los Angeles.

Waiting List Limited Preference: Tenant-Based Supportive Housing Program

The Tenant Based Supportive Housing program (TBSH) provides affordable, permanent, supportive housing for high-service-need chronically homeless individuals and families by providing rental subsidies and supportive services through the collaborative effort of HACLA and local service providers. The intensive supportive services enable chronically homeless individuals and families to stabilize their living conditions and remain successfully housed for the length of time that they are on the program. The TBSH program currently has 800 HCVs. HACLA currently works with nine non-profit and public agency partners located throughout the community.

Permanent Supportive Housing Project-Based Voucher Program

The Permanent Supportive Housing (PSH) Project-Based Voucher (PBV) Program provides long term rental subsidy contracts that facilitate development of housing for homeless and chronically homeless individuals and families, targeting a variety of special needs populations. Under federal regulations, a public

housing authority may choose to provide Section 8 PBV rental assistance for up to 20% of its units under the HCV program. Initial rents in PBV properties are set at the Section 8 Existing Fair Market Rents (FMRs) or Voucher Payment Standard (VPS), whichever is higher.

HACLA selects projects for PBV through a competitive Notice of Funding Availability (NOFA) issued jointly with the Los Angeles Housing and Community Investment Department and the Los Angeles County Health Departments as the Permanent Supportive Housing Program (PSHP). Upon Housing Authority project award and HUD approval, the HACLA executes an Agreement to enter into a Housing Assistance Payments (HAP) Contract with the developer. When the project is ready for occupancy, a 15 year HAP Contract for rental subsidy is executed. HACLA currently has 64 PSHP PBV projects online or in development, consisting of 2,550 units.

HUD-VASH Program

VASH stands for Veterans Affairs (VA) Supported Housing. The HUD-VASH Program is a partnership that was developed by the VA with HUD to provide permanent housing and supportive services to homeless and chronically homeless veterans. The program partners include the HACLA and the Los Angeles Veterans Affairs Medical Center (VAMC). The HUD-VASH goal is to combine Section 8 rental assistance vouchers with case management and clinical services provided by the VA at its medical centers to enable homeless and chronically homeless veterans and their families to re-integrate in the community, remain in stable housing, and lead healthy, productive lives. In May 2016, HACLA awarded 500 HUD-VASH PBVs to two developers to convert motels into housing for homeless veterans. In January 2017, HACLA was awarded 150 new PBV HUD-VASH vouchers, bringing the City's total allocation of these units focused on homeless and chronically homeless veterans to 4,059.

Waiting List Limited Preference: Homeless Veterans Initiative

The Housing Choice Voucher Program increased the Waiting List Limited Preference for Homeless by 500 vouchers to support the Homeless Veterans Initiative which will target homeless veterans who are not VA healthcare eligible, a population currently not being assisted. HACLA's non-profit and public agency partners will provide supportive services which will enable the veterans to maintain independent living and remain successfully housed. These vouchers will help to meet Mayor Eric Garcetti's goal of housing all homeless veterans.

Shelter Plus Care (Continuum of Care Rental Assistance) Program

The Shelter Plus Care Program was created under the McKinney-Vento Homeless Assistance Act and is designed to promote permanent housing with supportive service to persons with disabilities coming from the streets and emergency shelters. Shelter Plus Care grants require a supportive services match and leverage equal to, or greater than, the amount of rental assistance funded by HUD. HUD selects projects for Shelter Plus Care funding in a national Continuum of Care (CoC) competition based on regional and national homeless assistance goals. The Housing Authority chooses projects to include in an application to HUD through a Request for Proposals (RFP) process coordinated with the Los Angeles Homeless Services Authority (LAHSA). Selected applicants receive one-year rental assistance grants on behalf of homeless individuals and families. The grants provide for a variety of rental housing components: Tenant-Based (TRA), Sponsor-Based (SRA), and Project-Based (PBA). To be eligible for the program, a person must be homeless or chronically homeless with a mental illness, substance abuse disorder, or HIV/AIDS, and must be referred by the community-based organization that provides the required supportive services.

In January 2015, HACLA was awarded almost \$13 million from the 2014 CoC competition. The award from HUD will provide funding for 747 chronically homeless individuals and families, including veterans. The award also included 547 units for the Permanent Supportive Housing component of the competition and was the largest award in that category in the country.

In May 2016, HACLA was awarded \$3.2 million in new federal funds from the 2015 CoC competition to provide housing for chronically homeless people. The award from HUD will provide funding for supportive housing for 218 chronically homeless individuals and families in the City of Los Angeles. HACLA has participated in the Shelter Plus Care – Continuum of Care program since 1992 and has a current allocation of 4,150 units.

Moderate Rehabilitation Single Room Occupancy (SRO) Program

The Moderate Rehabilitation Single Room Occupancy (SRO) Program was created under the Stewart B. McKinney Homeless Assistance Act of 1987. The Section 8 rental assistance provided under this program is designed to bring more SRO units into the local housing supply to assist homeless persons into permanent housing. HUD’s strategy is to convert existing housing, a rundown hotel, or even an abandoned building into safe and decent housing. HUD selects applicants for Moderate Rehabilitation SRO funding in the national CoC competition based on regional and national homeless assistance goals. HACLA first chooses projects to include in an application to HUD through a Request for Proposal (RFP) process in coordination with LAHSA. Selected SRO projects (owners) receive rental assistance on behalf of a homeless tenant for ten years. The rental subsidy in the Moderate Rehabilitation SRO Program is attached to the building or unit as Project-Based rental assistance. The HACLA currently has an allocation of 1,107 SRO Moderate Rehabilitation units with four non-profit developers.

Table 8 HACLA Homeless Initiative Totals

Program	Allocation
Homeless Program	4,111
Tenant Based Supportive Housing Program	800
Permanent Supportive Housing PBV Program	2,550
Homeless Veterans Initiative	500
HUD-VASH Program	4,059
Shelter Plus Care Program	4,150
Moderate Rehabilitation SRO Program	1,107
TOTAL	17,277

Moving On Program

HACLA has made it possible for formerly homeless residents in the Shelter Plus Care program who have stabilized their lives and no longer need the level of supportive services provided by that program to transfer to the Housing Choice Voucher program and move on with their lives. This provides people with maximum independence and mobility, and frees our highest-impact, highest-service provision units for chronically homeless individuals who need them. This innovative program has assisted more than 500 formerly chronically homeless individuals to reintegrate into the community.

Home For Good

HACLA is a leader in Home For Good, LA's plan to end veteran and chronic homelessness. The Home For Good Funders Collaborative aligns public and private, City and County resources in a seamless NOFA process that supports shared goals, timing of grants, and a continuum of funding to extend the reach of all partners working to end homelessness. HACLA has aligned vouchers from the Tenant Based Supportive Housing program, Permanent Supportive Housing PBV program, Homeless Veterans Initiative, and Moving On program with the Funders Collaborative. The Home For Good Coordinated Entry System (CES) focuses outreach and housing navigation assistance on LA's most vulnerable homeless, matching them for prioritized access to available PSH units. The Home For Good Standards of Excellence are a community-driven set of standards and best practices that have been adopted to enrich the provision of supportive services and outreach for the homeless. HACLA performs a valued leadership role in each of these core Home For Good initiatives.

The program participant may also describe other information relevant to its assessment of Publicly Supported Housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

Housing Choice Voucher Program Waiting List Lottery to Open

For the first time in 13 years, HACLA will open the HCV Waiting List Lottery which will provide qualified households with the opportunity to apply for rental assistance. HACLA President and CEO Douglas Guthrie joined Los Angeles Mayor Eric Garcetti to make the announcement during a press conference on October 2 at the Los Angeles Central Library.²⁰⁰

Analysts expect up to 600,000 to apply during a two-week registration period this month. After an initial screening to drop those who neither live nor work in the city, and are therefore ineligible,²⁰¹ 20,000 will be selected by lottery to make up the new HCV waiting list. The other 580,000 will not making it onto the HCV waiting list though they will still able to sign on to the list of 35,000 waiting for Public Housing. HACLA has hired a consultant to manage the online registration, prescreen applicants, and pick the random winners. The consultant, CVR Associates, will also do outreach to alert eligible families and assist those who do not have access to computers.²⁰²

The application for the waiting list lottery is scheduled to open starting Monday, October 16, 2017 at 6:00 AM until Sunday, October 29, 2017 at 5:00 PM. Applications are available only online through **hacla.hcvlist.org**.

At the end of the application period, HACLA will use a computer-randomized lottery to select up to 20,000 applicants for placement on the HCV Waiting List. A preference for assistance will be given to applicants who are veterans or have a household member who is a veteran, released from such military service under

²⁰⁰ <http://www.hacla.org/news/ArticleID/124/Section-8-Housing-Choice-Voucher-Waiting-List-Lottery-to-Open>, accessed October 3, 2017

²⁰¹ In general, residency requirements for the HCV program are not allowed. 24 CFR § 982.207(b)(1)(i). However, HACLA is a Moving to Work PHA and, as a result, has the flexibility to disregard certain HUD regulations. Because of the demographics of LA City in relation to the region as a whole, HACLA's residency requirement is not likely to have a disparate impact that would raise fair housing concerns.

²⁰² <http://www.latimes.com/local/lanow/la-me-ln-section-8-waiting-list-20170922-htmstory.html>, accessed October 2, 2017

conditions other than dishonorable. As funding is available, HACLA will contact applicants for program eligibility determinations.²⁰³

Family Self-Sufficiency (FSS) Program

In July 2016, HACLA received a \$755,480 grant from HUD for the Family Self-Sufficiency (FSS) Program. FSS is a program designed to assist HCV participant families in identifying and reaching their educational and career goals by connecting them to services and resources in the community that can help them achieve economic self-sufficiency. Upon enrollment in the program, FSS families have access to job search assistance, referrals to available trainings, employment opportunities, and on-going case management services. The FSS Program gives participant families the possibility to qualify for a special savings (escrow) account and the opportunity to apply for the Section 8 Homeownership Program. There are 574 families who are enrolled in the program utilizing 100% of the slots.

The HACLA will maintain 11 service coordinator positions through the grant to support families in the program. Participants sign a five-year contract that requires the head of the household to obtain employment and that no family member receives welfare assistance at the end of the five-year term. If the family successfully completes its FSS contract and has qualified for an escrow account, the family receives the funds and can use the money for any purpose, including a down payment on a home, paying educational expenses, or starting a business.

WorkSource

HACLA cooperates with the City of Los Angeles Community Development Department, South Bay Center for Counseling, and Watts Labor Community Action Committee to provide employment training, job placement, and job retention services to Public Housing residents. Residents are assigned an Eligibility Worker who determines eligibility as well as assists with classroom training for employment certification, job placement, and job retention services. Residents receive supportive services to alleviate barriers to employment. HACLA is the only housing authority that operates a certified WorkSource Center.

HACLA has implemented programs such as:

- Sherwin-Williams Home Work Painter Training Program
- Environmental Stewardship Program
- Solar BPI Certification
- Northeast Tree Arborist Trainee
- Advanced Security Officer Training
- Construction Apprenticeship
- Process Technician Training
- Certified Nursing Assistant

Head Start

The Head Start Program is a program of the United States Department of Health and Human Services that provides comprehensive early childhood education, health, nutrition, and parent involvement services to low-income children and their families. HACLA is pleased to be able to support early education efforts

²⁰³ <http://www.hacla.org/news/ArticleID/124/Section-8-Housing-Choice-Voucher-Waiting-List-Lottery-to-Open>, accessed October 3, 2017

by charging \$1 annual fee to Head Start providers.

Community Satellite Libraries

These libraries offer public housing residents access to the Los Angeles Public Library's print and electronic collections including help for students and resources that will aid individuals and families in the communities. These libraries are currently offered in the Estrada Courts and Ramona Gardens housing developments.

Housing Based Day Supervision Program (HBDSP)

HBDSP is funded under the California Juvenile Justice Crime Prevention Act (JJCPA) through the Los Angeles County Probation Department. The program is offered to youth ages 8-18 at participating sites. HBDSP is an intervention and prevention program that offers community based services to at-risk youth and their families. The objective of this program is to increase the academic success of the youth and encourage parents to be involved in their child's educational career. Classes offered include Financial Literacy, Gang Intervention Workshops, Gender Specific workshops, Sexual Assault Workshops, and tutoring.

UCLA Watts Tutoring Program

Each student works one-on-one with a college intern. The interns provide homework assistance, as well as mentorship. Additionally, students receive firsthand experience on how a college campus operates. Tutoring is offered to youth ages 7-18 in the Imperial Courts, Jordan Downs, Nickerson Gardens, and William Mead housing developments.

Demonstration Re-Entry Program

This program is designed to allow ex-offenders leaving the criminal justice system to reunite with their families receiving HCVs. The assisted family must approve the admission. HACLA may waive criminal background check requirements only for permissible prohibitions where HUD grants the HACLA discretion to establish admission criteria. Ex-offenders will be required to participate in re-entry supportive services provided by community-based organizations and/or public agencies. These organizations and agencies will have been preselected by the HACLA through a Request for Proposals (RFP) process. Program size and parameters are subject to approval by the HACLA Board of Commissioners.

Contributing Factors-of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to Publicly Supported Housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Community opposition

Community opposition is a significant contributing factor to the segregation of Publicly Supported Housing in the City of Los Angeles and the broader region. In recent years, community opposition has played a role in hindering the development of high-density or affordable housing, both of which are disproportionately occupied by people of color and lower-income households. Salient examples of Not-in-My-Back-Yard

(NIMBY) activism include community opposition against a new zoning plan for Hollywood that would have allowed for the construction of buildings with greater density and height, especially around transit areas. Much of the development that community opponents have opposed, however, has lacked a substantial affordable component.

In San Pedro, a neighborhood with a disproportionately high non-Hispanic White population, a proposal for a 1,900-unit development on former naval housing land with affordable units for moderate-income households faced significant community opposition. In its approved form, it will comprise only 676 units, with nearly a third of the units designated as single-family homes. It is difficult to track the relocation of affordable housing developments originally slated to be built in higher-opportunity neighborhoods. However, researchers have noted that community opposition against inclusive housing can both exacerbate and create new R/ECAPs.

In a December 2016 study issued by the University of California Center Sacramento, the author noted that community opposition is a significant policy issue because “not building housing in some parts of the City pushes the pressure for development, along with any negative impacts, to neighborhoods with fewer resources to resist.” The tide may finally be turning. Measure S (a ballot initiative not supported by the City that would have placed a two-year moratorium on developments requiring zoning changes that increase building density or height) was soundly defeated at the polls. Had it been passed, it would have become more difficult for affordable housing developers to build in typically higher-opportunity, lower-density neighborhoods.

Displacement of residents due to economic pressures

Displacement of residents due to economic pressures is a significant contributing factor to strains on Publicly Supported Housing in the City of Los Angeles and the broader region. Over the last decade, the City has faced a serious affordable housing crisis that was, in part, caused by decades of insufficient housing production, particularly in predominantly non-Hispanic White, high opportunity areas.²⁰⁴ Although increased housing production is a key part of LA Mayor Eric Garcetti’s plan for addressing the crisis,²⁰⁵ some observers believe that the 100,000 planned units will not be enough to meet demand and slow rent increases. With a scarcity of available and affordable housing stock, displaced low-income tenants turn to Publicly Supported Housing – a resource that is already scarce and in high demand.

Also, unless additional steps are taken to mitigate the effects of development on low-income renters of color, the City’s development strategy could have unintended consequences. For example, a disproportionate share of the City’s new permitting has been concentrated in areas near Downtown and in transit corridors, areas that have limited though increasing overlap with high opportunity areas.²¹ Although the expansion of public transportation into West LA and the Valley through the Expo Line and the Red Line has increased new construction in high opportunity areas, if new development is going to further the goals of fair housing and desegregation, measures must be taken to ensure that new development is both available to members of protected classes and spread widely across the City, including in West LA and Valley neighborhoods not served by new transit lines.

²⁰⁴ <http://www.abundanthousingla.org/2017/01/03/dont-call-it-a-boom-la-housing-growth/>

²⁰⁵ <http://plan.lamayor.org/portfolio/housing-and-development/>

The City has taken positive steps to protect more vulnerable renters by, for example, reinterpreting the Ellis Act to ensure any new development does not substantially reduce the stock of affordable housing²⁰⁶ and passing a series of measures to track and preserve affordable housing.²⁰⁷ However, these measures are new. If new development is going to further the goals of fair housing and desegregation, measures must be taken to ensure that new development, particularly new development with subsidized affordable units, is both accessible and spread widely across the city.

Also, when investments are made in majority-minority areas, the City must ensure that their investment does not raise costs and displace current residents. For example, a University of California Los Angeles (UCLA) study shows that White, college educated populations tend to move into areas with newly developed public transportation.²⁰⁸ As these neighborhoods gentrify and become more expensive, any low income residents who are displaced by the high costs must look to the few subsidized units that remain or seek housing elsewhere, increasing demand for on the limited existing stock of public housing. In Echo Park, many Latino families that have been living there for decades have been displaced due to increasing demand to move into the neighborhood.²⁰⁹ Similar trends are displacing residents across the City in neighborhoods like Koreatown, Mid-City, Westlake, and more.²¹⁰ When displaced low income people of color are forced into more affordable, relatively high poverty areas, R/ECAPs emerge. Similarly, displaced minorities having no option but to move into predominately minority communities perpetuates segregation.

Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking

Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking is a contributing factor to disproportionate housing needs of protected classes in connection with Publicly Supported Housing, including disparate exposure to homelessness, in Los Angeles and the wider region. Domestic abuse disproportionately impacts women of color.²¹¹ In the second Healthy Neighborhoods Focus Group, a participant stated that, in LA, victims of domestic violence do not leave their abusers due to the lack of housing options available to them, a sentiment substantiated by the sheer number of unsheltered survivors in the city. In 2017, there were over 11,000 homeless survivors of domestic violence in Los Angeles and only about 10% were sheltered in some way.²¹² The same survey revealed that, of the overall homeless population in the region, roughly 10% of respondents were currently fleeing violence.²¹³ One third of Los Angeles' homeless are women, and 65% of those women have reported experiencing assault.²¹⁴

A 2015 audit of the City's efforts to combat domestic violence found that they "were disjointed and inconsistent and did not include all of the elements" a successful support program.²¹⁵ Since the audit, the

²⁰⁶ <http://www.latimes.com/local/lanow/la-me-ln-housing-ellis-act-20170404-story.html>

²⁰⁷ <https://la.curbed.com/2017/4/27/15438878/los-angeles-affordable-housing-rules-tenant-rights>

²⁰⁸ <http://www.urbandisplacement.org/case-studies/ucla>

²⁰⁹ <http://www.latimes.com/local/california/la-me-0315-lopez-echo-20150313-column.html>

²¹⁰ <https://la.curbed.com/2016/8/30/12712942/gentrification-map-los-angeles-county>

²¹¹ <https://thinkprogress.org/how-women-of-color-are-disproportionately-impacted-by-domestic-violence-6674e93a50c5>

²¹² 2017 Greater Los Angeles Homeless Count

²¹³ 2017 Greater Los Angeles Homeless Count

²¹⁴ <http://www.latimes.com/projects/la-me-homeless-women/>; <https://www.citylab.com/equity/2016/10/a-brief-history-of-womens-housing-in-los-angeles/505487/>

²¹⁵ <http://www.latimes.com/local/lanow/la-me-ln-los-angeles-domestic-violence-audit-20151001-story.html>

City has increased its efforts and funding for programs to support those facing domestic violence. For example, in 2015, the Los Angeles Police Department (LAPD) had Domestic Abuse Response Teams (DARTs), officers that specialize in responding to domestic violence calls and connecting victims with services, in 10 units. Because of a lack of resources, those DARTs were only able to respond to one out of every thirty calls.²¹⁶ In the last two years, Mayor Garcetti increased funding for DARTs, and the program has since expanded to all 21 units of the LAPD.²¹⁷ LA has also undertaken a public awareness campaign and won a \$450,000 grant from the U.S Department of Justice (DOJ) to \$425,000 provide domestic and sexual abuse response to victims with disabilities.²¹⁸

In addition to the protections given under Violence Against Women Act (VAWA) and FHA, LA has taken enacted additional policy protections for victims of domestic violence seeking Publicly Supported Housing. HACLA's policy regarding victims of domestic violence states that it does "not discriminate against an applicant or public housing resident on the basis of the rights or privileges provided under the VAWA (2005 Violence Against Women Act Pub L. 109-162 Stat 2960). Additionally, being a victim of domestic violence, dating violence or stalking, is not an appropriate basis for denial of admission to or eviction from public housing if the applicant or resident is otherwise qualified for admission or continued assistance."

Under the Housing Choice Voucher Program, the HACLA has numerous housing assistance programs that target homeless individuals and families. The HACLA's public housing program only has a preference for homeless when the vacancy rate exceeds 10%. There currently is no preference for victims of domestic violence. If an applicant is a victim of domestic violence and there are issues with their background check (e.g. credit, past evictions or other negative marks) that are attributable to being a victim of domestic violence, that applicant is eligible for VAWA protections to ensure that their status as a victim does not prevent access to housing.

The lack of safe, affordable housing for domestic violence survivors continues to be a significant challenge. Since 2016, there has been a 128% increase in homeless survivors of domestic violence in the City of Los Angeles.²¹⁹ Domestic violence service providers have reported that landlords double charge for rent, taking money from the City and the survivor, and also refuse to accept checks from third parties who may be supporting survivors. In light of these troubling facts, it is clear that to address the housing needs of women, particularly low-income women of color, the City must work with advocates and housing providers to create and ensure appropriate housing for survivors of domestic violence.

Impediments to mobility

Impediments to mobility are a significant contributing factor to segregation for residents of publicly supported housing. Based on local analysis,²²⁰ the high cost of housing limits where lower paid members

²¹⁶ <http://www.latimes.com/local/lanow/la-me-ln-los-angeles-domestic-violence-audit-20151001-story.html>

²¹⁷ <https://www.lamayor.org/mayor-garcetti-launches-bold-new-domestic-violence-awareness-and-prevention-campaign>

²¹⁸ <https://www.lamayor.org/mayor-garcetti-launches-bold-new-domestic-violence-awareness-and-prevention-campaign>

²¹⁹ 2017 Greater Los Angeles Homeless Count

²²⁰ http://www.labusinesscouncil.org/files/LABC_Report-V7-for_web.pdf

of the workforce can afford housing that is within fair market rent limits and has led large percentages of low-income people of color to endure long commutes.

In February 2010, HACLA revised the Occupancy Standard to bring voucher bedroom sizes offered to assisted families down to parity with surrounding Los Angeles regional public housing agencies and decreased the Voucher Payment Standard, which reduced the maximum rent offered per unit size. These measures have reduced overall subsidy payments.

The lack of a housing mobility counseling program means that HCV holders in the City may lack valuable information about the benefits of moving to areas that offer greater economic opportunity and mobility, educational opportunity, and neighborhood quality. Housing mobility counseling programs provide families with assistance in locating available units, higher rental subsidy levels, payments for security deposits and other moving costs, and counseling to help them adjust to such neighborhoods, most of which are predominantly non-minority communities.²²¹

Lack of local or regional cooperation

Lack of local or regional cooperation is a significant contributing factor to the segregation of Publicly Supported Housing in the region. Municipalities in high opportunity areas throughout the region have not adequately fostered the development of Publicly Supported Housing that would ensure that all communities are meeting the needs of the region's low-income residents. HCIDLA's predecessor agency, Los Angeles Housing Department (LAHD), in collaboration and participation with the Southern California Association of Governments (SCAG) as the lead applicant for the six-county region, applied to HUD for FY2011 Sustainable Communities Regional Planning Grant Program (SCRIP Grant). Los Angeles City, through LAHD as the lead for the Los Angeles County Region Consortium, played a critical role in the preparation of the application with partners at SCAG and the Los Angeles County Consortium for Sustainable and Equitable Communities (LA Consortium). The LA Consortium was comprised of LAHD; the Los Angeles Department of City Planning; the Los Angeles County Department of Regional Planning; the Los Angeles County Department of Public Health; LA Metropolitan Transportation Authority (Metro); Enterprise Community Partners; Reconnecting America, MoveLA; and the Low-Income Investment Fund and the California Community Foundation. The SCRIP's goals and objectives consisted of supporting metropolitan and multi-jurisdictional planning efforts that integrate housing, land use, economic and workforce development, transportation, and infrastructure investments in a manner that empowers jurisdictions to consider the interdependent challenges of: (1) economic competitiveness and revitalization; (2) social equity, inclusion, and access to opportunity; (3) energy use and climate change; and (4) public health and environmental impact.

Although SCAG, and the other partner departments/agencies were not awarded funding from HUD, HCIDLA continues to collaborate with the members of the LA County Region Consortium on other citywide Transit Oriented Development (TOD) related projects (i.e., pursue funding/grant options and legislative improvements). The LA Region could exponentially expand its collaborative impact with a comprehensive regional effort to understand the intersections of the region's disparate planning efforts (housing, land use, economic and workforce development and infrastructure investments).

²²¹ www.housingmobility.org, accessed August 09, 2017

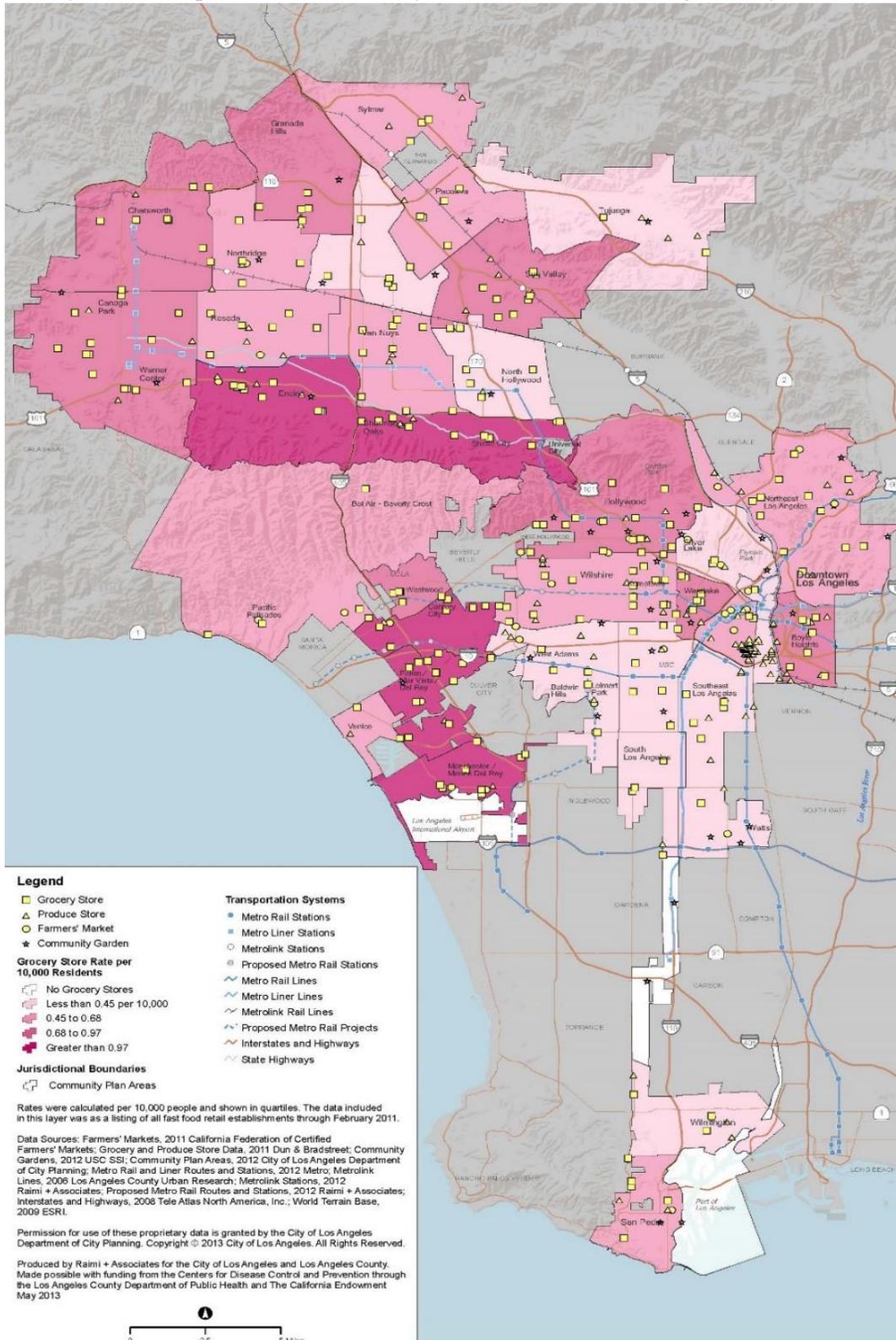
Los Angeles County Metropolitan Transportation Authority (Metro) serves as the Los Angeles region's transportation planner and coordinator, designer, builder and operator for one of the country's largest, most populous counties. Elected Officials from regional jurisdictions serve on its Board of Directors

Lack of private investment in specific neighborhoods

A lack of private investments is a significant contributing factor to disparities in access to opportunity for residents of Publicly Supported Housing in the City of Los Angeles and the broader region. Low-income, high minority individuals are disproportionately housed in Publicly Supported Housing, which consists largely in the East/Central LA and South LA neighborhoods. When assessing the various metrics that reflect lack of private investment in specific neighborhoods, it is indisputable that predominantly low-income, high minority communities suffer the greatest consequences and are often left without an opportunity for economic mobility. Generally, the distribution of community problems such as the lack of adequate housing, the lack of investments in small businesses, and the lack of access to community amenities, impedes economic mobility for low-income people of color and prevents them from accessing high opportunity areas, thus perpetuating segregation. One indicator of the level private investment in specific neighborhoods is the issuance of building permits for new construction. Since January 2013, the LA Department of Building and Safety has issued 14,874 building permits for new construction, including 1,240 for commercial properties, 1,036 for apartment buildings with three or more units, and 12,598 for one or two family dwellings. The combined 2,276 permits for commercial properties and apartments are a useful proximity for private investment trends. The permitted properties are located in 113 zip codes, but nearly half of the properties (1,120) are located in just 24 zip codes that have had 30 or more such building permits. Of those 24 zip codes, none are located in East LA and just one (90011) is located in South LA. Neighborhoods in these sections of the City continue to experience the harmful effects of disinvestment. The problem of lack of private investment, however, is not consistent across all low-income communities of color in LA. Neighborhoods like Chinatown, Koreatown, the Westlake District, and Pico-Union are the site of significant private investment. A second metric is economic development that creates jobs and increases access to amenities such as supermarkets, pharmacies, and banks. R/ECAP neighborhoods like Watts and Boyle Heights have limited access to supermarkets, most of which are several miles away and only accessible with personal transportation.

The distribution of grocery stores, as depicted in Map 6 (below), produced by the Reinvestment Fund provides another lens through which to evaluate the effect of a lack of private investment in specific neighborhoods. The Reinvestment Fund's methodology is designed to identify areas where residents travel longer distances to reach supermarkets when compared to the benchmark (average) distance traveled by residents of non-low/moderate income areas. As the map shows, residents who live in neighborhoods located in South LA, are disproportionately subjected to limited supermarket access. These populations overwhelmingly include high percentages of low income Hispanic and Black residents. According to a report by researchers at Johns Hopkins University, "mostly [B]lack neighborhoods present "a double disadvantage" in supermarket access. In fact, the study showed that Black neighborhoods with little poverty had fewer supermarkets, on average, than high-poverty White areas. Due to their race and level of poverty, specific neighborhoods with large Black populations lack opportunities for healthy food options and decent wage paying jobs. As an urban sociologist at American University put it, "the systematic refusal of corporations and small businesses to invest more generally in some largely African American and Latino neighborhoods robs those communities of the employment and education opportunities, that, over time, encourage healthier eating and living." As a result, a lack of private investment in the form of access to super markets and healthy food chains, contribute to the perpetuation of segregated neighborhoods.

Map 6 Grocery Store Rate per 10,000 and Healthy Food Sources for Los Angeles City



Additionally, access to banks is severely limited in R/ECAP neighborhoods, furthering the lack of opportunities to secure funding from global financial institutions that could have impactful results within R/ECAP neighborhoods. South Los Angeles is home to 16 banks, one of which being JPMorgan Chase. On January 23, 2014, JPMorgan Chase announced a \$7 million-dollar grant to four leading Community Development Financial Institutions (CDFIs). The grant is part of the foundation's new CDFI Collaboratives program, a \$33 million commitment to help CDFIs and small business lenders build capacity and to jumpstart job creation in low- and moderate-income communities in the Chase footprint. Neither South Los Angeles nor the City of Los Angeles was included in this important economic initiative, whereas Los Angeles County is home to 287 JPMorgan Chase Branches with \$27 billion dollars in deposit. The South Los Angeles study area has 4 branches with a total deposit base of \$201,507,000.00 according to the FDIC Summary of Deposits Report for the period ending June 30, 2013. When leading global financial institutions choose to privately invest into specific low-income communities, positive economic and social results can be seen; unfortunately, communities in South Los Angeles continue to be neglected and forgotten. Without private investment into the community, neighborhoods like Watts are left without access to traditional and largely affordable capital, and new businesses cannot finance their growth or daily operations in a cost-effective manner. Thus, high minority populations are left in overwhelmingly segregated neighborhoods without opportunities for any upward economic mobility.

Lack of public investment in specific neighborhoods, including services and amenities

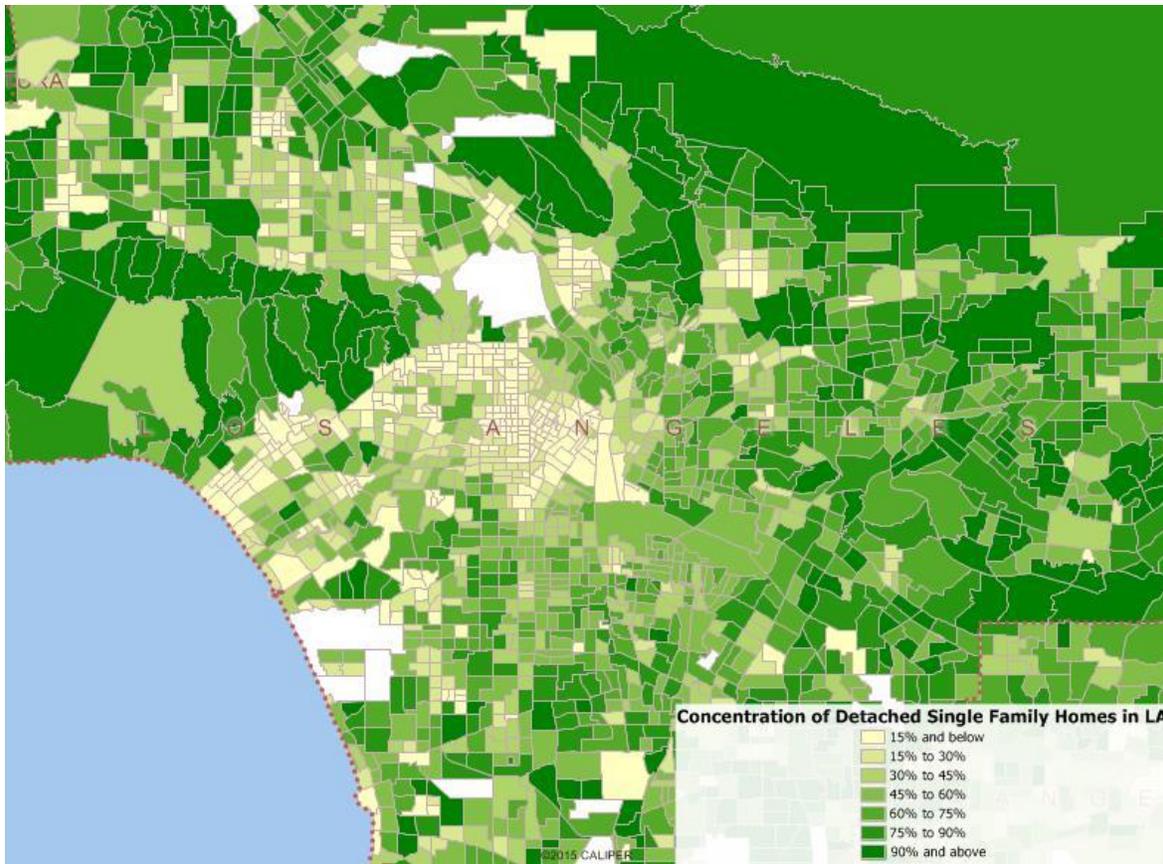
A lack of public investments is a significant contributing factor to fair housing issues related to Publicly Supported Housing in the City of Los Angeles and the broader region. Low-income persons of color are disproportionately housed in Publicly Supported Housing, which in turn is predominantly located in East/Central LA and South LA. By various metrics, communities in these areas suffer from disproportionately more severe community problems stemming from insufficient public investment. One metric for public investment is the condition of paved streets. In Watts, which ranks among the lowest in LA City in income and in its population of white residents, there is a concentration of paved streets that are in poor condition. A similar condition exists in Westlake, another area with disproportionately high percentages of Hispanic and Asian populations. The distribution of low-performing schools also roughly coincides with the geographic spread of R/ECAPs. According to a report by the California Office to Reform Education, at least two of the five worst-performing high schools were located in R/ECAPs: David Starr Jordan Senior High in Watts and Dr. Maya Angelou Community High in South Park. A third metric is sidewalk condition. While bad sidewalks plague the entire city, as of 2015, the areas with the greatest number of complaints included Downtown and Boyle Heights, both R/ECAPs. Areas with similarly high numbers of complaints are clustered around neighborhoods that are majority minority and have lower median incomes than other areas of the City. The City voted in 2016 to dedicate over a billion dollars to sidewalk repair, but it is too early to evaluate the success of that investment.

One important indicator of the adequacy of public investment is the condition of paved streets. In Watts, which ranks among the lowest in LA City in income and in its population of White residents, there is a concentration of paved streets that are in poor condition. A similar condition exists in the Westlake District, another area with disproportionately high percentages of Hispanic and Asian populations. The distribution of low-performing schools also roughly coincides with the geographic spread of R/ECAPs. According to a report by the California Office to Reform Education, at least two of the five worst-performing high schools were located in R/ECAPs: David Starr Jordan Senior High in Watts and Dr. Maya Angelou Community High in South Park. A third metric is sidewalk condition. While bad sidewalks plague the entire city, as of 2015, the areas with the greatest number of complaints included Downtown and Boyle Heights, both

R/ECAPs. Areas with similarly high numbers of complaints are clustered around neighborhoods that are majority-minority and have lower median incomes than other areas of the City. The City voted in 2016 to dedicate over a billion dollars to sidewalk repair, but it is too early to evaluate the success of that investment. As part of the process for updating Community Plans for South and Southeast LA, the City is creating incentives for private investments that provide amenities that are desired by community members. This proactive strategy could ameliorate the existing lack of private investment.

Land use and zoning laws

Land use and zoning laws are a significant contributing factor to the segregation of Publicly Supported Housing in the City of Los Angeles and the broader region. Publicly Supported Housing is most often relatively high density multi-family housing. Persons of color disproportionately occupy high-density housing, which can generally be built only in areas zoned for multi-family homes, multiple dwellings, or single-family homes on small lots. As the map below shows, some neighborhoods within LA have much higher concentrations of detached single-family homes than the City as a whole. In particular, neighborhoods in West LA and the San Fernando Valley that are adjacent to the Santa Monica Mountains have high concentrations of detached single-family homes at the census tract-level, sometimes exceeding 90%. These neighborhoods include parts of Bel Air, Brentwood, and Pacific Palisades in West LA and parts of Encino, Tarzana, and Woodland Hills in the Valley, among other areas. Such development patterns are influenced by a wide variety of factors but tend to overlap with residential zoning districts that are restricted to detached single-family homes. At the same time, much of Downtown and East LA, as well as parts of South LA that are relatively close to Downtown, have low concentrations of detached single-family homes. Exceptions to these general trends are numerous, and there are parts of West LA and the Valley that have multi-family housing, as well as parts of Downtown and East LA that have single-family homes. Nonetheless, strategically upzoning portions of communities in West LA and the Valley, which are high opportunity areas near the Santa Monica Mountains, would incentivize property owners to develop multi-family housing, resulting in publicly-created value. Where traditional multi-family housing is not feasible because of topography, increased density could take the form of two to four unit dwellings that are designed similarly to single-family homes. Montgomery County, Maryland has successfully integrated affordable housing into what are otherwise detached single-family neighborhoods by having developers include duplexes that resemble single-family homes. That development would contribute to a more balanced housing stock in those neighborhoods and would create opportunities to foster residential integration within those neighborhoods, which are heavily non-Hispanic White. Increased integration would be particularly likely to result if affordable housing was provided on-site at new multi-family developments in those neighborhoods.



In 2016, a public referendum, Measure JJJ or the “Build Better LA” initiative passed with 65% of voters approving. Measure JJJ requires that rental projects that receive more than a 35% increase in density provide at least 5% of the total number of units at rents affordable to extremely low-income households, plus either 6% of units to very low-income households or 15% of units to lower-income households. Measure JJJ allows developers to meet the affordable housing requirements by building units on site, building units off-site, acquiring and preserving existing at-risk affordable properties, or paying an in-lieu fee. The in-lieu fee amount specified in Measure JJJ is equal to 1.1 times the number of affordable units that the developer would otherwise be required to provide, multiplied by an “affordability gap”. The high in-lieu fees may promote more on-site affordable housing development leading to more mixed income housing opportunities in the City. However, the “in-lieu” option has shortcomings and may allow developers to concentrate affordable housing in already segregated areas whereas affordable housing would have to be provided on-site if there was no in-lieu fee option. Finally, multiple dwelling zones, like one-family dwelling zones, require a set-aside of parking spaces based on the number of habitable rooms in the zone. Given that households below the poverty line are proportionally less likely to use a car to commute to work, these parking space requirements may hinder the development of larger multi-family projects. Re:code LA, an initiative to revise LA’s zoning code, is considering altering parking requirements based on the context of the zone.

The City has also worked within the confines of unfavorable court decisions to foster the development of affordable housing through inclusionary zoning. Although the City is barred from mandating the inclusion of affordable rental units in residential developments by a judicial decision, the City uses its Density Bonus

program to incentivize the inclusion of affordable rental units. The City also created an Expedited Permitting Section in its Department of City Planning to facilitate affordable housing development.

Loss of affordable housing

The loss of affordable housing is a significant contributing factor to the segregation of Publicly Supported Housing. Housing prices in Los Angeles have grown four times faster than incomes since 2000. And almost 2/3 of all households in the City are housing burdened (meaning they spend more than the recommended 30% of their income on rent or mortgage payments).

Regulated apartments in some neighborhoods have an economic incentive to exit from government restrictions and increase their asking rents to market-rate levels. This is particularly true in desirable, high-opportunity neighborhoods where apartments can command a high, market-rate rent. A series of affordability regulations on deed-restricted affordable units, particularly LIHTC-funded units, are set to expire over the next five years. The California Housing Partnership Corporation projects that about 14,000 units spread across 232 buildings in Los Angeles County are at "very high" (within 1 year) or "high" (between 1-5 years) risk of being converted to market rates over the next five years with a significant percentage of those units residing within Los Angeles City limits.²²² Within City limits, there are 11,771 units that are at "very high" risk (3,992 within 1 year) or "high" risk (additional 7,779 between 1-5 years) of being converted to market rates over the next five years with expiring HUD Rental Assistance Contracts and Maturing Assisted Mortgages. These properties also contain another 3,388 homes that do not receive rental assistance but often provide housing to low-income households and are also at-risk.²²³ These units have been priced at below-market rates for typically 30 to 40 years as a condition of getting financing or permission to build. But with these expiring affordability restrictions, some are deciding to take advantage of the County's hot housing market.²²⁴ The City is already experiencing a loss of rent-stabilized units; from 2001 to June 2017, the City of Los Angeles has lost 22,131 Rent Control Units from the rental market for permanent removal or demolition.²²⁵

As part of Measure JJJ's community plan requirement, the plan must ensure that there is no loss of affordable housing units through transit-oriented development investments. The implementation of this planning requirement will be important to efforts to reduce the loss of affordable housing. Occupancy codes and restrictions

Occupancy codes and restrictions are a contributing factor to fair housing issues related to Publicly Supported Housing in the City of Los Angeles and the broader region. Table 8 (below), shows HACLA's occupancy standards for the HCV program, limiting the maximum number of residents to just double the number of bedrooms. These occupancy restrictions constrain the housing choice of low-income families, who may be unable to "double up" to minimize their rent burden. Despite the occupancy restrictions established by City and County Housing Authorities, the City's municipal code does not contain unusually restrictive occupancy codes.

²²² (California Housing Partnership)

²²³ (Department, HCIDLA Report Back: Regarding Preservation of At-Risk Affordable Housing Initiatives)

²²⁴ Disproportionate Housing Needs Analysis

²²⁵ [City of Los Angeles Housing Element](#)

Table 9 HACLA’s Housing Choice Voucher Occupancy Standard

Minimum Size of Family	Maximum Size of Family	Voucher Size* Number of Bedrooms
1	1	SRO
1	2	0 bedroom
1	4	1 bedroom
3	6	2 bedroom
5	8	3 bedroom
7	10	4 bedroom
9	12	5 bedroom
11	14	6 bedroom

Siting selection policies, practices and decisions for Publicly Supported Housing, including discretionary aspects of Qualified Allocation Plans and other programs

To increase the stock of affordable housing throughout the City, particularly in neighborhoods of opportunity, there is a need for the removal of barriers that make affordable housing more difficult to produce, especially in certain neighborhoods. Additional recommendations by from the Alliance of Californians for Community Empowerment (ACCE) and the Housing Rights Center (HRC) Coalition include the removal of discretionary approvals that require public hearings where opposition based on stereotypes and fears about people of color, people with disabilities and low-income people make affordable housing difficult to locate in affluent or segregated neighborhoods. The Coalition suggests the City should reduce parking and other requirements that increase the cost of affordable housing production. Rezoning land in higher opportunity areas to make it available for multi-family housing would begin to reverse the City’s historic patterns of siting affordable housing in areas with fewer resources. The Coalition also suggested the City should conduct a study of the development and permit process to identify changes that reduce the cost and/or time or increase the land where affordable housing can be developed.

Source of income discrimination

Source of income discrimination significantly contributes to the segregation of Publicly Supported Housing in the City of Los Angeles and the broader region. Many Americans living in poverty or with disabilities rely on federal or state assistance, including rental assistance, for their income. When landlords have the latitude to reject tenants based on the source of their income, those who rely on governmental assistance become more constrained in their housing options, are barred from neighborhoods where their source of income is not recognized, and can have trouble accessing housing at all. In a competitive rental market like Los Angeles, the effects of this kind of discrimination are particularly acute. Because source of income discrimination essentially shrinks the stock of available Publicly Supported Housing, Section 8 voucher holders are left to find housing primarily in segregated neighborhoods and R/ECAPs. Although California does have a law that bans source of income discrimination, in 2010 in *Sabi v. Sterling*, the California Court of Appeal for the Second District interpreted the law to not cover discrimination against households using Section 8 or Housing Choice Vouchers. The rental listings on Craigslist sharply illustrate the impact of that decision; one search reveals more than 75 rental listings in Central LA that

specifically note that Section 8 applicants are not welcome and about 300 ads of this kind in the county at-large.

Source of income discrimination also disproportionately impacts communities of color. While the vast majority of census tracts in the City contain fewer than 50 households that rely on Section 8 Housing Choice Vouchers, census tracts with the highest concentrations of households receiving voucher assistance are located primarily in majority-minority areas. Also, between 2000 and 2013, the number of households in the City receiving assistance from both programs decreased overall, a decline that was almost universal in majority White areas. But, the few areas in which the number of households relying on federal assistance rose were mostly in majority-minority neighborhoods. The fact that the lowest income renters have become more concentrated in majority-minority neighborhoods is indicative of both increased segregation and R/ECAPs.

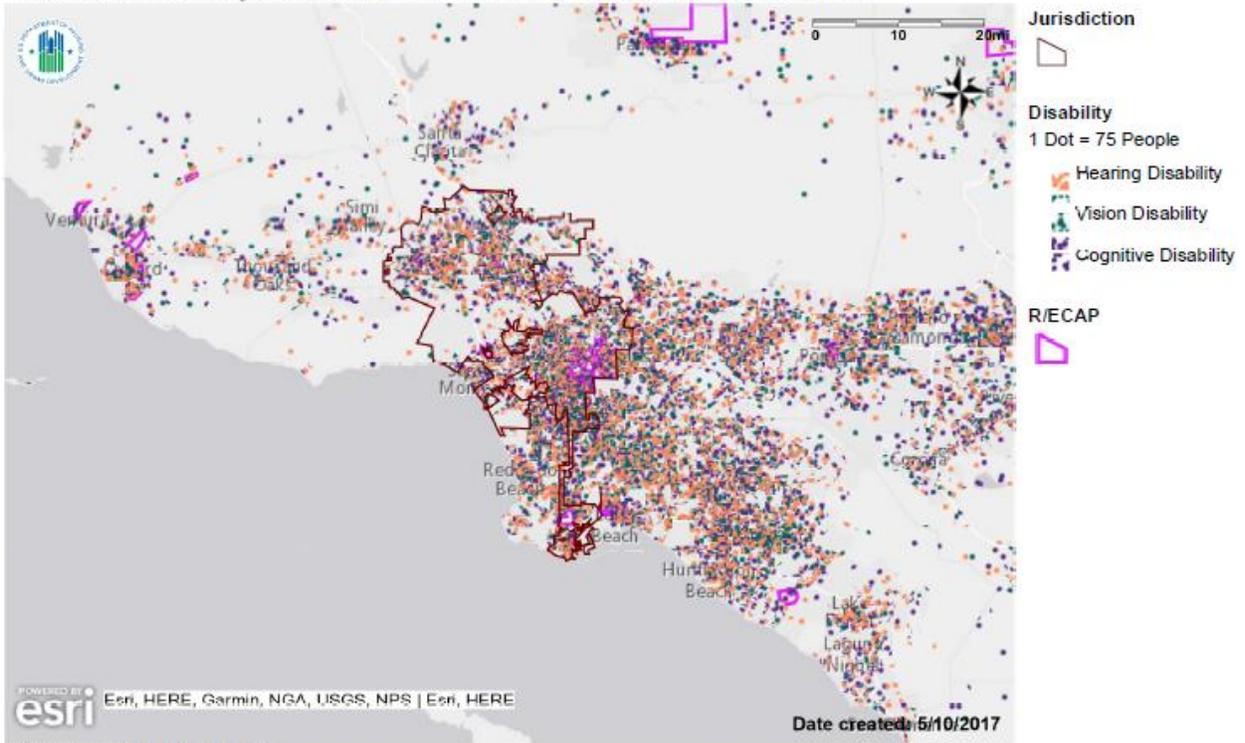
The California State Senate has a bill pending (SB 1053) that would protect tenants who rely on Section 8 vouchers, but it has not passed yet. Elsewhere in California, Santa Clara County has banned Section 8 discrimination in its unincorporated areas, Santa Monica has passed a law prohibiting the practice in City limits, and San Jose is considering a similar measure. However, the City of Los Angeles has no such protections in place today.

D. Disability and Access

Population Profile

Map 1 Disability by Type (Hearing, Vision, Cognitive) for the Los Angeles Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 14 - Disability by Type

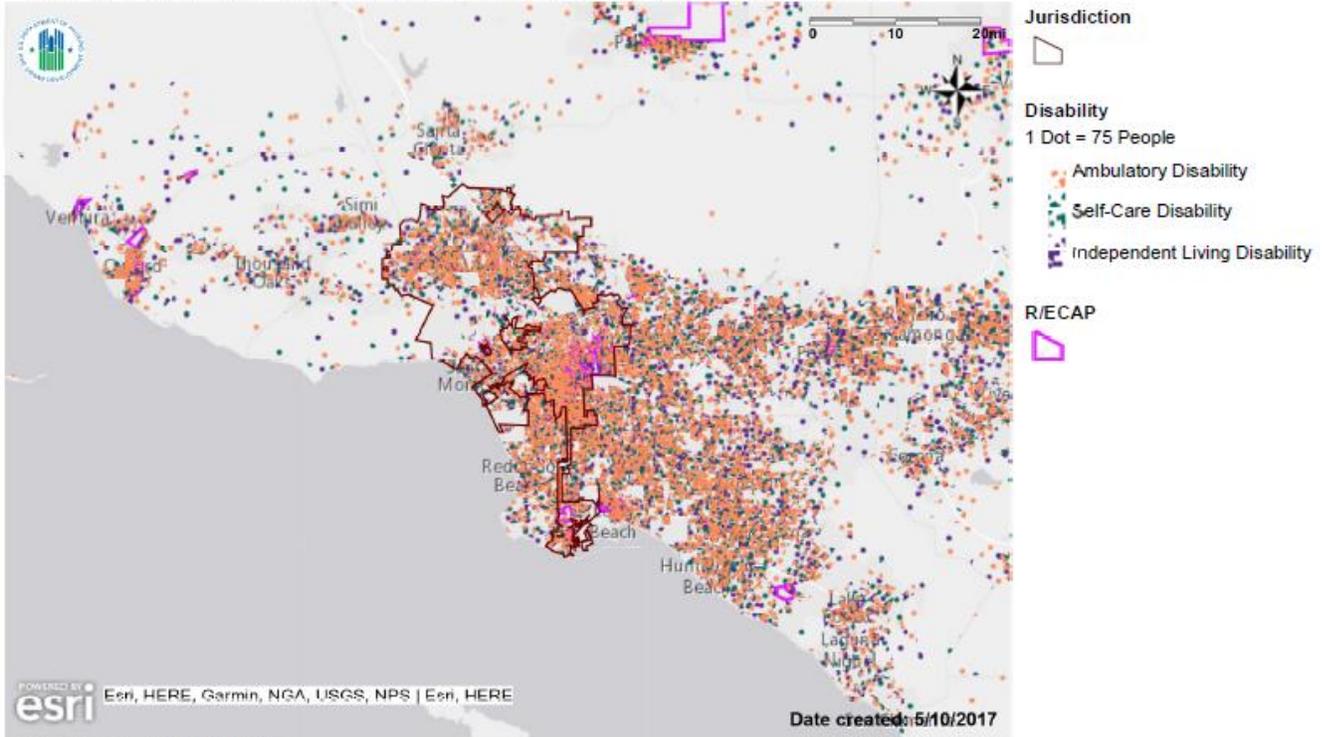
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Map 2 Disability by Type (Ambulatory, Self-Care, Independent) for the Los Angeles Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 14 - Disability by Type

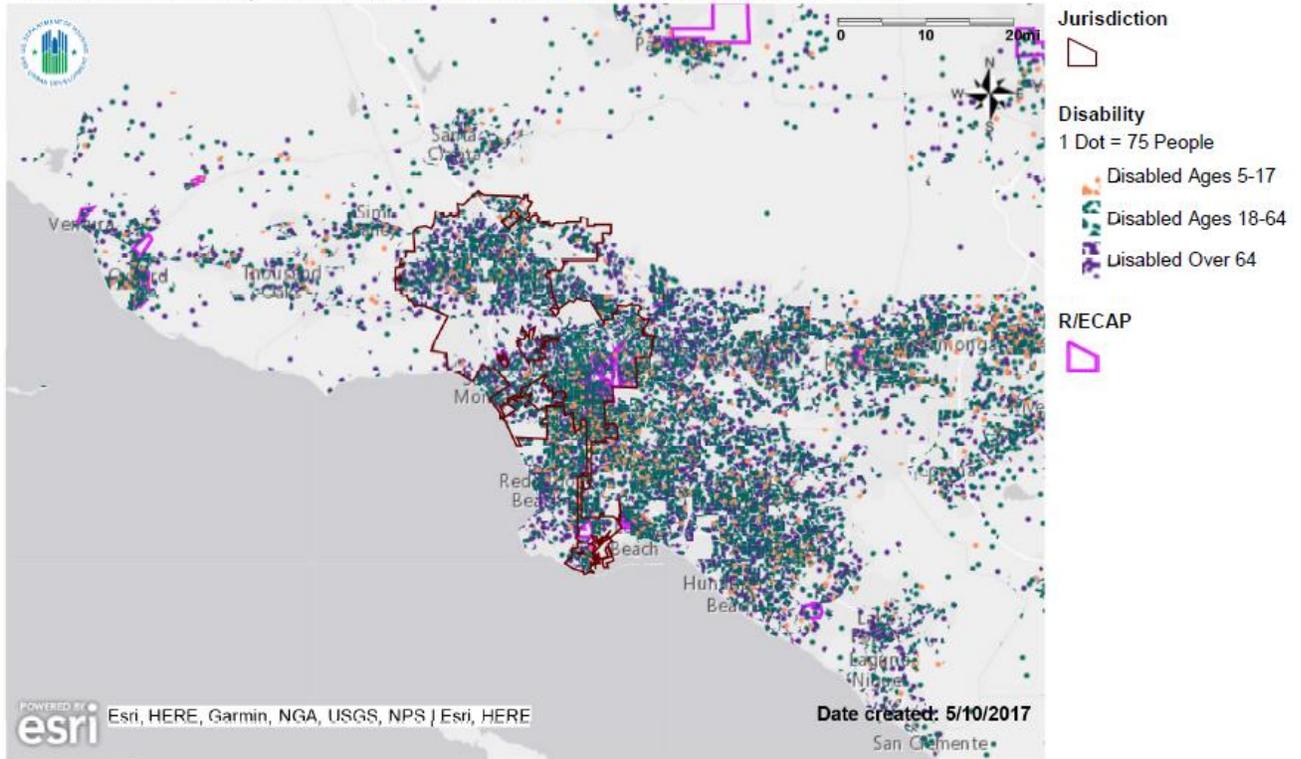
Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Map 3 Disability by Type and Age for the Los Angeles Region

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 15 - Disability by Age Group

Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs

Jurisdiction: Los Angeles (CDBG, HOME, ESG)

Region: Los Angeles-Long Beach-Anaheim, CA

Table 4 Disability by Type

Disability Type	(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction		(Los Angeles-Long Beach-Anaheim, CA) Region	
	#	%	#	%
Hearing difficulty	88,327	2.49%	303,390	2.52%
Vision difficulty	74,408	2.10%	227,927	1.90%
Cognitive difficulty	141,158	3.98%	445,175	3.70%
Ambulatory difficulty	206,091	5.81%	641,347	5.34%
Self-care difficulty	100,325	2.83%	312,961	2.60%
Independent living difficulty	155,774	4.39%	496,105	4.13%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

How are people with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

ACS Disability Information

According to the 2011-2015 American Community Survey (ACS) 5-Year Estimates, 206,091 residents of the City of Los Angeles have ambulatory disabilities, which represents 5.81% of the City's population; 88,327 residents have hearing disabilities; and 74,408 residents have vision disabilities. The definition of ambulatory disabilities is "having serious difficulty walking or climbing stairs." People with ambulatory disabilities may not need a fully accessible unit, particularly if they do not use wheelchairs. They may require a unit on the ground floor or in an elevator building, perhaps with some architectural modifications. Therefore, ambulatory disabilities is not an accurate indicator of the number of accessible mobility units needed since people with ambulatory disabilities don't necessarily move to a wheelchair.

Approximately twenty-seven percent (27.4%) of people with disabilities have incomes below the poverty line, as opposed to 18.6% of individuals without disabilities. Although a breakdown of poverty status by type of disability is not available through the American Community Survey (ACS), it is clear that the need for affordable housing is greater among people with disabilities than it is among people without disabilities. Another indicator of disability and limited income are the number of people receiving Supplemental Social Security (SSI) which is limited to people with disabilities. Ninety-three thousand eight hundred and ninety-nine (93,899) Los Angeles residents receive SSI which is such a small subsidy that all of the recipients are extremely low-income. Not all SSI recipients have the types of disabilities that necessitate accessible units.

Concentration and Patterns

People with disabilities in both the region and the City tend to be concentrated in the areas of the greatest population density. Within the City, these areas include Downtown LA and its surrounding neighborhoods and the San Fernando Valley. West LA and the Harbor area tend to have lower concentrations of people with disabilities. Sparsely populated areas in the Santa Monica Mountains have relatively few people, including few people with disabilities. The dot density of people with disabilities in the San Fernando Valley is similar to that in the urban core of Los Angeles. However, the overall population density of the urban core is much higher, therefore, it is likely that people with disabilities comprise a higher percentage of the population of the Valley than they do of the urban core. This is unsurprising since, as discussed below, elderly individuals make up a large share of people with disabilities. More suburbanized sections of the City tend to have older populations. The same pattern is broadly apparent in the region. Densely populated areas like Long Beach, Santa Ana, and Anaheim appear to have concentrations of people with disabilities, but, in comparison to lower density areas, people with disabilities do not make up a higher share of the population of those generally younger communities.

Densely populated neighborhoods with high concentrations of people with disabilities but not a disproportionate share comprise many of the R/ECAPs in the City of Los Angeles and the region (though there are relatively few R/ECAPs in the region outside of the City). Black, Hispanic, and, to a lesser extent, Asian or Pacific Islander households are often concentrated in these neighborhoods. The San Fernando Valley, which has higher concentrations of people with disabilities, is more racially and ethnically diverse though there are pockets of concentrated non-Hispanic White population; a low percentage of San Fernando Valley residents are Black. White population in the City and the region is concentrated in West LA. In the region, White population is also concentrated in coastal portions of Orange County. These areas appear to have relatively light concentrations of people with disabilities.

Describe whether these geographic patterns vary for people with each type of disability or for people with disabilities in different age ranges for the jurisdiction and region.

Individuals with hearing and independent living disabilities tend to be more widely dispersed throughout the City and region than are people with vision, cognitive, ambulatory, and self-care disabilities who are more concentrated in high density neighborhoods. This pattern of distribution likely reflects the relative age of people with disabilities by type of disability. All categories of disabilities become more prevalent as individuals age, but, according to 2011-2015 American Community Survey 5-Year Estimates, the proportion of elderly to non-elderly people with disabilities by type of disability is highest for people with hearing disabilities and the proportion is lowest for people with cognitive disabilities. Lower density, more suburban parts of both the City and the region tend to have older populations than do higher density, more urban neighborhoods.

Examples of this pattern include the low-density West LA neighborhoods of Brentwood and Bel Air, which have a concentration of people with hearing disabilities but very few individuals with vision or cognitive disabilities. At the same time, many neighborhoods in Downtown LA, East LA, and South LA have large concentrations of people with cognitive disabilities. Outside of the City but within the region, high-density Santa Ana has a greater concentration of people with cognitive disabilities than low-density Newport Beach, while Newport Beach still has a significant number of people with hearing disabilities. For the most part, though not entirely, these patterns of density tend to mirror patterns of racial, ethnic, and socioeconomic composition. Accordingly, individuals with types of disabilities that are more likely to affect younger people are significantly affected by residential racial and ethnic segregation and concentrated poverty.

The pattern that can be seen directly through the mapping of individuals by type of disability can also be seen directly through the mapping of individuals with disabilities by age. Low-poverty, low-density, predominantly non-Hispanic White West LA neighborhoods, as well as coastal and hillside communities in Orange County, are more likely to be home to elderly people with disabilities while high-poverty, high-density, predominantly minority neighborhoods in Downtown LA, East LA, South LA, Anaheim, and Santa Ana are more likely to be home to younger people with disabilities.

Housing Accessibility

Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Accessibility Requirement for Federally-Funded Housing

HUD's implementation of Section 504 of the Rehabilitation Act of 1973 (24 CFR Part 8) requires that federally financed housing developments have five percent (5%) of total units be accessible to individuals with mobility disabilities and an additional two percent (2%) of total units be accessible to individuals with sensory disabilities. It requires that each property, including site and common areas, meet the Federal Uniform Accessibility Standards (UFAS) or HUD's Alternative Accessibility Standard.

Within LA City, there are 6,941 public housing units and 21,385 Project-Based Section 8 units that are subject to Section 504 of the Rehabilitation Act. Public Housing and Project Based Section 8 units are considered to be Publicly Supported Housing. Nine hundred and five (905) people with disabilities reside in public housing and 2,714 reside in Project-Based Section 8 units. At this time, we don't know how many

accessible units are in public housing or among Project Based Section 8 units. Project Based Section 8 units are located in properties assisted by the City and in private properties with no City financing. Those properties assisted by the City are counted as part of HCIDLA's HOME portfolio.

The HOME Partnership Program is a grant of federal funds for housing, therefore, these units are subject to Section 504. The majority of the City's HOME funds were spent developing privately owned multifamily housing. There are approximately 476 housing developments with 89,351 units that have received federal funds since 1988; the vast majority were HOME funds. Additionally, single family homes built with HOME funds are also subject to Section 504. Unfortunately, it is difficult to distinguish in the HUD data between units purchased with HOME downpayment assistance, and not subject to Section 504, and those built with HOME funds. HCIDLA staff report that very few single family units were built with HOME funds. They estimate that approximately 90% of HOME funds for 1,610 homebuyer units were utilized for downpayment assistance.

Since 2014, approximately 120 projects with approximately 8,500 units have entered the development phase. These developments have been designed with accessible units and are carefully monitored to ensure that they are constructed properly. HCIDLA will not release project construction retention until the property meets all accessibility standards.

In 2018, the City of Los Angeles will begin surveying all of its federally funded, bond funded, and Community Redevelopment Agency funded housing developments that entered construction prior to 2015 to determine how many developments meet the Section 504 or the 2010 ADA Title II standards for accessibility and which units have modifications for people with disabilities who do not need a full mobility or hearing/vision unit. Approximately 730 properties with more than 110,000 units will be surveyed. Accessible units will be identified and those developments without accessible units will be retrofitted at City expense to ensure that each development in the HCIDLA portfolio contains the correct number of Section 504 mobility and sensory (hearing/vision) units. Project architectural accessibility information will be reported on a semi-annual basis.

Occupancy data with regard to disability status for HOME-assisted units is not currently available. Properties will be surveyed for occupancy data with regard to disability in 2018. This information will be reported by housing developments on a quarterly basis.

Low Income Housing Tax Credit (LIHTC) Units

According to data from HUD's LIHTC database, there are 28,830 low-income units in LIHTC-financed developments in LA City. However, many projects in the early years of the LIHTC were neither approved nor regulated by the City since the developer could apply directly to the California Tax Credit Allocation Committee (CTCAC). In the mid-1990s, CTCAC changed its policy and required developers to obtain local jurisdiction approval of their projects. However, that did not give jurisdictions regulatory authority over a project. The City has regulatory authority only over projects with HCIDLA financing. Nine percent tax credit projects that also received HOME funds are counted as part of the HOME housing portfolio.

Most of the projects that receive multifamily mortgage bond allocations also receive 4% tax credits. If the City issues bonds for the project, the City has a regulatory agreement. There are approximately 126 multifamily mortgage bond projects with no other federal funds with 11,962 units. As described

previously, these projects will be surveyed to determine the accessible units and which need to be retrofit. Bond projects that received federal funds are counted as part of the HOME housing portfolio.

The question of whether Section 504 or Title II of the Americans with Disabilities Act applies to LIHTC developments has not been resolved by the courts. Title II of the ADA prohibits discrimination on the basis of disability in all service, programs, and activities provided to the public by non-federal governmental entities except transportation services. The 2010 ADA Standards (ADAS) differ from Section 504 in some respects but essentially, they contain the same types of requirements including the requirement for 5% mobility units and 2% hearing/vision units.

However, in 2015, CTAC has issued guidance stating that the accessibility requirements of the California Building Code (CBC) for public housing (Chapter 11B) apply to LIHTC developments. Chapter 11B is the California equivalent of the 2010 ADA Standards. Section 1.9.1.2.1. of the CBC states that the accessibility requirements apply to “any building, structure, facility, complex ...used by the general public.” Facilities made available to the public, included privately owned buildings. CTAC has expanded the requirement so that 10% of total units in a LIHTC development must be accessible to people with mobility disabilities and that 4% be accessible to people with sensory (hearing/vision) disabilities.

Also, effective 2015, CTCAC required that 50% of total units in a new construction project and 25% of all units in a rehabilitation project located on an accessible path will be mobility accessible units in accordance with CBC Chapter 11B. CTAC also provides incentives for developers to include additional accessible units through its Qualified Allocation Plan. LIHTC units comprise an important segment of the supply of affordable, accessible units in Los Angeles and the broader region. Projects with Chapter 11B accessible units are just beginning to lease-up. Most projects also have City funds and are part of the HCIDLA portfolio. Within these developments, an individual unit may be subsidized by tax credits or HOME or both.

Housing Choice Vouchers

Sixteen thousand one hundred and ninety-one (16,191) people with disabilities reside in units assisted with Housing Choice Vouchers in Los Angeles, but this does not represent a proxy for actual affordable, accessible units. Rather, Housing Choice Vouchers are a mechanism for bringing otherwise unaffordable housing, which may or may not be accessible, within reach of low-income people with disabilities. Unless another source of federal financial assistance is present, units assisted with Housing Choice Vouchers are not subject to Section 504 although participating landlords remain subject to the Fair Housing Act’s duty to provide reasonable accommodations and to allow tenants to make reasonable modifications at their own expense.

Fair Housing Amendments Act Units

The Fair Housing Amendments Act of 1988 (FHAA) covers **all** multifamily buildings of four or more units that were first occupied on or after March 13, 1991 – not just affordable housing developments. The FHAA added protections for people with disabilities and prescribed certain basic accessibility standards, such as one building entrance must be accessible; there must be an accessible route throughout the development, and public rooms and common rooms must be accessible to people with disabilities. Although these accessibility requirements are not as intensive as those of Section 504, they were a first step in opening many apartment developments to people with disabilities regardless of income level. The FHAA was also very helpful for middle-income and upper-income people with disabilities also need accessible housing.

It is important to note that FHAA units are **not** the same as accessible units under Section 504 or ADA Title II. Therefore, utilizing FHAA units as a proxy for the number of accessible housing units available or required under Section 504 or ADA Title II does not produce an accurate count. Although they are not fully accessible, these units are an important source of housing for people with disabilities who do not need a mobility or hearing/vision unit. Advocates have reported that there is widespread noncompliance with FHAA accessibility requirements among private developers. Obtaining reasonable accommodations and modifications as well as effective communications is often difficult. While training is offered on the FHAA by many agencies in Los Angeles, it is voluntary since these are private developers. Owners and property managers of developments in the HCIDLA portfolio will receive mandatory training in fair housing related to disability in 2017; however, there exists no mandatory requirement for private developers who do not do business with the City to be trained in their responsibilities.

Data breaking down affordable, accessible units by number of bedrooms is not available for private housing. For Publicly Supported Housing, the overwhelming majority (76.71%) of Project-Based Section 8 units are 0-1 bedroom units while public housing is spread much more evenly across bedroom sizes. In considering the overall distribution of publicly supported units by number of bedrooms, it is important to keep in mind that the number of Project-Based Section 8 units in Los Angeles is significantly greater than the number of public housing units. It appears that affordable, accessible units that can accommodate families with children are extremely limited in the City. Although data reflecting the percentage of families with children that include children with disabilities is not available, 2.9% of all children have a disability. If children with disabilities are evenly distributed across families with children, about 10,748 families in the City include a child with a disability. Data reflecting the distribution of Publicly Supported Housing units by type of Publicly Supported Housing and by number of bedrooms is not available at a regional level.

Focusing on the region as opposed to the City-level makes the situation, if anything, appear direr. The proportion of the population that is comprised of people with disabilities is roughly similar to that of the city. For example, 5.34% of residents of the region have an ambulatory disability, and 2.52% of residents have a hearing disability, as opposed to 5.81% and 2.49% of City residents respectively. At the same time, both Publicly Supported Housing and multi-family housing, which are more likely to be accessible because of the requirements of Section 504 and the Fair Housing Act, are disproportionately concentrated in the City of Los Angeles. Many accessible, unsubsidized units are likely to be unaffordable to low-income households as relatively new private housing in Los Angeles tends to be the most expensive housing. These trends are mirrored at the regional level. Overall, it is clear that the supply of affordable, accessible housing falls short of the level of need for such housing among people with disabilities in Los Angeles.

The City of Los Angeles receives funding from HUD through the Housing Opportunities for Persons with AIDS (HOPWA) program to provide affordable housing and aid supportive services providers who serve people with HIV or AIDS. Congress created the HOPWA program to specifically address the needs of people with HIV and AIDS, as opposed to people with disabilities generally, because of the special importance of people with HIV and AIDS having a safe and stable place to store and take antiretroviral medications. Unlike the CDBG and HOME programs, the City also distributes HOPWA funds to sub-grantees in the region but outside of the City. For the 2015 Program Year, which is the most recent year for which data is available, the City received \$13,911,902.08, which went to 31 sub-grantees. The most significant recipients within the City of Los Angeles were the Housing Authority of the City of Los Angeles (HACLA), which received \$3,136,670, primarily for tenant-based rental assistance, and \$2 million to support two affordable housing developments through the City's Affordable Housing Trust Fund. Non-

profit service providers, some of which assist clients both within and outside of the City, also received allocations.

Arlington Square and T. Bailey Manor are the two developments assisted with HOPWA funds through the Affordable Trust Fund for 2015. Arlington Square is a 48-unit development in which 100% of units are set aside for homeless individuals with serious mental illness and ten units are reserved for individuals with HIV or AIDS. The units are all either studio or one-bedroom units, which may make the building inaccessible to individuals with families or individuals who need the assistance of live-in aides. The development is located in the Arlington Heights neighborhood which is an area of low-income Black and Hispanic population concentration, at the border of a R/ECAP that stretches Eastward from Arlington Avenue to South Hobart Boulevard and stretches South from Venice Boulevard to West Washington Boulevard. T. Bailey Manor is a 46-unit development in which 100% of units are set aside for special needs residents. With the exception of the manager's unit, all units are one-bedrooms or studios. The development is located in Northeast Los Angeles near the border of the Glassell Park and Eagle Rock neighborhoods. This middle-income area has a diverse mix of Hispanic, Asian, and White households but few Black residents. The area is subject to severe gentrification pressures. There are no R/ECAPs in the area.

HACLA reported that 142 households currently receive either tenant-based or project-based rental assistance through HOPWA. Of those 142, all, by definition, include one or more persons with disabilities; 60 are Black; 47 are Hispanic; 28 are White; six are Asian or Pacific Islander; and one is American Indian or Alaska Native. The vast majority of HOPWA beneficiaries are men. Recipients of HOPWA rental assistance in the City of Los Angeles are slightly more heavily Hispanic and less heavily Black than Housing Choice Voucher holders. This may reflect, in part, the time at which households began receiving assistance, with Housing Choice Voucher holders starting to receive subsidy at an earlier point at which the City was more heavily Black and less heavily Hispanic than it is today. Although data on the sexual orientation of HOPWA beneficiaries is not available, the AIDS Coordinator for the City of Los Angeles reports that 89% of individuals living with HIV in LA City are gay and bisexual men despite gay and bisexual men comprising just 4% of the City's population. Sexual orientation is a protected class under the California Fair Employment & Housing Act, and a federal court in Colorado recently interpreted the federal Fair Housing Act's prohibition on sex discrimination to prohibit discrimination on the basis of sexual orientation.

136 of the 142 households²²⁶ are spread across 77 census tracts with households living in units assisted by project-based HOPWA subsidies comprising the vast majority of residents who are concentrated in census tracts with multiple HOPWA beneficiaries. There is a stark difference between where project-based HOPWA beneficiaries reside and where tenant-based beneficiaries live. Two census tracts, 1895 and 7002, are home to all 34 project-based households. Census tract 1895, which is 75.8% non-Hispanic White, is located in the Hollywood Hills, and Census Tract 7002, which is 79.2% non-Hispanic White, overlaps the City of West Hollywood and a portion of the Hollywood Hills West neighborhood. In census tract 1895, nine beneficiaries are Hispanic, seven are Black, four are non-Hispanic White, and one is Asian. In census tract 7002, seven beneficiaries are non-Hispanic White, five are Hispanic, and one is Black. Combined, this is a markedly lower proportion of Black households and a higher proportion of non-Hispanic White households than among all HOPWA rental assistance beneficiaries. By comparison, the average census

tract in which a non-project-based HOPWA beneficiaries is just 9.9% non-Hispanic White. Just seven families with children benefit from HOPWA rental assistance.

Summary

Overall, it is clear that the supply of affordable, accessible units in both the City of Los Angeles and the region is insufficient to meet the need. Over 200,000 City residents have some level of need for accessible units, and, by the most generous, over-inclusive measures, there may be roughly 90,000 units that have been produced subject to the Fair Housing Act's design and construction standards and approximately 4000-5000 units that must be accessible subject to Section 504. There is, without question, some overlap between these two categories, some of these units are likely non-compliant, and some accessible units are occupied by individuals who do not have disabilities. Except for HCIDLA funded projects entering the architectural plans stage in or after 2014, there is very little known at this time about the number and unit types of accessible housing in the City. Surveys of existing properties in the HCIDLA portfolio will begin in 2018. As developments are surveyed, that information will be entered into an Accessible Housing Unit Plan that will show the location, number and types of units, and other relevant information about the property.

Describe the areas where affordable, accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

Relying on the discussion of Publicly Supported Housing to guide the assessment of which types of housing are most likely to be affordable and accessible, such housing is highly concentrated in predominantly Black and/or Hispanic areas in Downtown, South, and East LA that include many R/ECAPs.²²⁷ By contrast, using the year of construction as a proxy to estimate the presence of accessible units, accessible units would appear to be much more integrated. The portions of Los Angeles with the youngest housing stock are generally in West LA and the San Fernando Valley, which are both heavily non-Hispanic White and in Downtown LA, which is racially and ethnically diverse but contains pockets of segregated Hispanic and Asian population concentration. South LA and East LA have relatively old housing stock. Thus, the unsubsidized accessible housing stock is likely to be in integrated areas, where local demographics roughly mirror those of the City and the region, and segregated areas that are predominantly non-Hispanic White while accessible Publicly Supported Housing units are more likely to be in R/ECAPs and areas near R/ECAPs. The same patterns are largely borne out at a regional level with the caveat that, within Orange County, both predominantly non-Hispanic White and heavily minority communities have relatively young housing stock.

²²⁷ The spatial distribution of publicly supported housing is discussed in greater detail in the Publicly Supported Housing Analysis section of this Assessment of Fair Housing.

To what extent are people with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

Table 5 Disability by Publicly Supported Housing Program Category

(Los Angeles, CA CDBG, HOME, ESG) Jurisdiction	People with a Disability	
	#	%
Public Housing	905	12.82%
Project-Based Section 8	2,714	12.99%
Other Multifamily	510	16.73%
HCV Program	16,191	36.82%
(Los Angeles-Long Beach-Anaheim, CA) Region		
Public Housing	1,794	15.11%
Project-Based Section 8	5,447	12.39%
Other Multifamily	961	15.92%
HCV Program	N/a	N/a
<p>Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.</p> <p>Note 2: Data Sources: ACS</p> <p>Note 3: “#” represents Unit count, not count of individual persons</p>		

[Note 3: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

In LA City, according to the 2011-2015 American Community Survey 5-Year Estimates, 9.8% of the civilian noninstitutionalized population has a disability. In the Los Angeles-Long Beach-Anaheim, CA Metro Area, that figure is 9.4%. The American Community Survey does not facilitate the disaggregation of the population of people with disabilities by income in order to facilitate an assessment of what percentage of households that are income-eligible for Publicly Supported Housing include one or more people with disabilities. As the table above reflects, the proportion of people with disabilities in each category of Publicly Supported Housing, both in the City and in the region, exceeds the overall population concentration of people with disabilities. For public housing, Project-Based Section 8, and Other (HUD) Multifamily housing, however, the degree by which the percentage of occupants who are people with disabilities exceeds the representation of people with disabilities in the overall population is modest. In light

of the socioeconomic disparities between people with disabilities discussed above, it is possible that the representation of people with disabilities in those categories of Publicly Supported Housing is merely at parity with or even lags representation in the income-eligible population. By contrast, with regard to Housing Choice Vouchers, it is clear that people with disabilities have robust access to that form of Publicly Supported Housing and participate at levels that almost certainly exceed their proportion of the income-eligible population. With regard to public housing, in particular, the HUD-provided data may not accurately reflect the proportion of tenant households including people with disabilities. HACLA data shows that 24.7% of households residing in public housing include one or more people with disabilities.

The HUD AFFH Data & Mapping Tool does not include data reflecting the percentage of occupants of Housing Choice Voucher-assisted units who are people with disabilities in the entire region. By looking separately at data for the non-entitlement portions of Los Angeles County and Orange County, which comprise the region, it is possible to develop a composite picture. In the non-entitlement portions of Los Angeles County, 27.37% of residents of such units are people with disabilities. In the non-entitlement portions of Orange County, 26.44% of residents of such units are people with disabilities. It is important to note that these statistics do not reflect the demographics of individuals living in voucher-assisted households in entitlement cities like Santa Monica and Santa Ana. Nonetheless, the consistency across jurisdictions is reflective of a pattern of greater access to Housing Choice Vouchers than to other forms of Publicly Supported Housing among people with disabilities in the region. This split is ironic in that other types of Publicly Supported Housing generally must comply with more intensive accessibility requirements than the units in which people with disabilities utilize vouchers.

Integration of People with Disabilities Living in Institutions and Other Segregated Settings

To what extent do people with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Up until a wave of policy reforms and court decisions in the 1960s and 1970s, States, including California, primarily housed people with intellectual and developmental disabilities and individuals with psychiatric disabilities in large state-run institutions. In California, institutions for people with intellectual and developmental disabilities are called developmental centers, and institutions for people with psychiatric disabilities are called state hospitals. Within these institutions, people with disabilities have had few opportunities for meaningful interaction with individuals without disabilities, limited access to education and employment, and a lack of individual autonomy. The transition away from housing people with disabilities in institutional settings and toward providing housing and services in home and community-based settings accelerated with the passage of the Americans with Disabilities Act in 1991 and the U.S. Supreme Court's landmark decision in *Olmstead v. L.C.* in 1999. In *Olmstead*, the Supreme Court held that, under the regulations of the U.S. Department of Justice (DOJ) implementing Title II of the Americans with Disabilities Act (ADA), if a state or local government provides supportive services to people with disabilities, it must do so in the most integrated setting appropriate to the needs of a person with a disability and consistent with their informed choice. This obligation is not absolute and is subject to the ADA defense that providing services in a more integrated setting would constitute a fundamental alteration of the state or local government's programs.

The transition from widespread institutionalization to community integration has not always been linear, and concepts of what comprises a home and community-based setting have evolved over time. Although it is

clear that developmental centers and state hospitals are segregated settings and that an individual's own house or apartment in a development where the vast majority of residents are individuals without disabilities is an integrated setting, significant ambiguities remain. Nursing homes and intermediate care facilities are clearly segregated though not to the same degree as state institutions. Group homes fall somewhere between truly integrated supported housing and such segregated settings, and the degree of integration present in group homes often corresponds to their size.

Below, this assessment includes detailed information about the degree to which people with intellectual and developmental disabilities and individuals with psychiatric disabilities reside in integrated or segregated settings. The selection of these two areas of focus does not mean that people with other types of disabilities are never subject to segregation. Although the State of California did not operate analogous institutions on the same scale for people with ambulatory or sensory disabilities, for example, many people with disabilities of varying types face segregation in nursing homes. Data concerning people with various disabilities residing in nursing homes is not as available as data relating specifically to people with intellectual and developmental disabilities and people with psychiatric disabilities.

Table 6 Intellectual and Developmental Disabilities
Performance of Regional Centers in Los Angeles-Long Beach-Anaheim, CA MSA, 2016

	Less consumers live in developmental centers	More children live with families	More adults live in home settings	Less children live in large facilities (more than 6 people)	Less adults live in large facilities (more than 6 people)
State Average	0.30%	99.24%	78.89%	0.05%	2.60%
Frank D. Lanterman Regional Center	0.11%	99.73%	77.30%	0.04%	7.56%
Harbor Regional Center	0.10%	99.78%	81.90%	0.00%	1.08%
North Los Angeles County Regional Center*	0.19%	99.44%	80.77%	0.0%	2.71%
South Central Los Angeles Regional Center*	0.46%	99.47%	80.58%	0.09%	3.44%
Westside Regional Center*	0.27%	99.69%	84.37%	0.00%	1.06%
East Los Angeles Regional Center	0.13%	98.58%	85.73%	0.10%	0.67%
San Gabriel/Pomona Regional Center	0.11%	98.92%	71.34%	0.23%	6.94%
Regional Center of Orange County	0.36%	99.15%	75.94%	0.04%	3.34%

In California, a system of regional centers is responsible for coordinating the delivery of supportive services primarily to individuals with intellectual and developmental disabilities. The regional centers serve individuals with intellectual disabilities, individuals with autism spectrum disorder, individuals with epilepsy, and cerebral palsy. These disabilities may be co-occurring. Although there is some variation from regional center to regional center, individuals with intellectual disabilities and individuals with autism spectrum disorder make up the lion's share of consumers. All data regarding the regional centers is drawn from their annual performance reports.

In the region, there are eight regional centers that perform this role, one covering all of Orange County and seven serving Los Angeles County. Of the seven regional centers serving Los Angeles County, five serve parts of the City of Los Angeles. The Frank D. Lanterman Regional Center serves the central portion of the City of Los Angeles as well as some communities at the Southern end of the San Fernando Valley. The Harbor Regional Center serves the Harbor and San Pedro areas. The North Los Angeles County Regional Center serves much of the northern portion of the San Fernando Valley. The South Central Los Angeles Regional Center serves South LA. The Westside Regional Center serves West LA.

On an annual basis, these regional centers report to the California Department of Developmental Services on their performance in relation to benchmarks for achieving community integration of people with intellectual and developmental disabilities. As reflected in the table above, regional centers in the region generally have lower rates of institutionalized consumers than is the case statewide though the South Central Los Angeles Regional Center and the Regional Center of Orange County are exceptions to this trend. Fairview Developmental Center in Costa Mesa is the primary institution serving the region. It is one of three remaining developmental centers in the State, all of which are expected to close in the coming years. Fairview Developmental Center is scheduled to close in 2021. The Frank D. Lanterman Regional Center, which was located in Pomona, previously served the region, as well, but closed at the end of 2014.

Children with intellectual and developmental disabilities are more likely to reside with their families than statewide in the City and in most of the region though the East Los Angeles Regional Center, the San Gabriel/Pomona Regional Center, and the Regional Center of Orange County, none of which serve LA City, are exceptions. In the service areas of those three regional centers, children with intellectual and developmental disabilities are less likely to reside with their families than statewide. There are fewer clear trends with regard to the size of placements in which adults and children reside. Within LA City, there are consumers served by regional centers, particularly the Frank D. Lanterman Regional Center, that serve relatively more adult consumers in larger settings, and consumers served by regional centers, like the Westside Regional Center, for which the opposite is true.

There does not appear to be a significant relationship between racial, ethnic, and socioeconomic characteristics of the areas served by the regional centers and the degree to which people with intellectual and developmental disabilities reside in home and community-based settings. For example, although the South Central Los Angeles Regional Center, which serves a disproportionately Black and Hispanic and heavily low-income portion of the City, has the highest rate of institutionalization in the region, the Westside Regional Center and the Regional Center of Orange County, which serve more heavily non-Hispanic White and more affluent areas, have the next highest rates of institutionalization.

Overall, this data shows that, within the City and the region, people with intellectual and developmental disabilities are typically at least slightly more able than such individuals are statewide to access community-

based settings. At the same time, the data also shows that a significant minority of adults with intellectual and developmental disabilities, in particular, reside in comparatively segregated, congregate settings. It is highly likely that not all people with intellectual and developmental disabilities who would like to live in integrated settings in the City and the region have the opportunity to do so.

Psychiatric Disabilities

The Los Angeles County Department of Mental Health is responsible for coordinating the provision of supportive services for people with psychiatric disabilities in LA County, including in LA City. Behavioral Health Services within the County of Orange Health Care Agency is responsible for coordinating the provision of supportive services in the remainder of the region. The Los Angeles County Department of Mental Health had 102,088 clients who received direct mental health services through the County's Community Services and Supports programs. The Department operates six programs serving adults, four programs serving children, five programs serving older adults, and six programs serving transitional age youth, in addition to its cross-cutting activities. The Department divides the County into eight service areas, five of which contain portions of LA City. They are the San Fernando, Metro West, South, and South Bay/Harbor Service Planning Areas. Of those areas, the Metro Service Planning Area serves by far the most consumers while the West Service Planning Area serves by far the fewest consumers.

Of the Department's programs, the Adult Full Service Partnership, the Children's Full Service Partnership, the Older Adult Full Service Partnership, and the Transitional Age Youth Full Service Partnership are likely the most critical for ensuring that the provision of supportive services facilitates community integration. These programs target individuals with severe psychiatric disabilities who are at high risk of segregation in institutional settings, incarceration, and homelessness. These programs have been successful at reducing the number of people with psychiatric disabilities who reside in segregated settings or are homeless. In 2015, clients who received services through the Adult Full Service Partnership experienced a 71% reduction in days spent homeless, a 66% reduction in days spent hospitalized, a 55% reduction in days spent in jail, and a 48% increase days spent living independently. Participants in the Transitional Age Youth Full Service Partnership generally had similarly positive outcomes while results for the Children's Full Service Partnership and the Older Adult Full Service Partnership were more ambiguous. In the case of the Children's Full Service Partnership, the sample size for certain populations, such as those who were homeless or in jail, was very small, counseling caution in drawing strong conclusions. There may be reason for concern that older adults with severe psychiatric disabilities, while avoiding jail or homelessness through participation in programs, are unable to access independent living options and, are instead residing in nursing homes, board and care homes, and other congregate facilities. Additionally, for each of these programs, the number of clients whom the County is able to serve is limited by resource constraints. People with severe psychiatric disabilities who are not receiving services may be particularly likely to reside in segregated settings or to experience homelessness.

The Department's Adult Housing Services program is also noteworthy for its role in increasing access integrated settings for people with psychiatric disabilities. As a result of Proposition 63, a successful 2004 statewide ballot initiative, funding is available for permanent supportive housing for people with psychiatric disabilities. The Department partners with the California Housing Finance Agency to administer the program in Los Angeles County. During fiscal year 2014-2015, four new developments containing 167 total units and 87 units for households including people with psychiatric disabilities opened. Two of the four developments opened during that fiscal year are in the City of Los Angeles. The Louis Apartments are located in the Sunland-Tujunga neighborhood in the San Fernando Valley, and the Figueroa Apartments are located in

South LA. The Louis Apartments contain 46 total units, 11 of which are Mental Health Services Act units. This is a level concentration of people with psychiatric disabilities that is consistent with community integration goals. The Figueroa Apartments contain 18 total units, all of which are Mental Health Services Act units. Although providing individuals with their own independent apartments advances important community integration goals related to autonomy and privacy, the failure to develop the Figueroa Apartments as a mixed-occupancy development decreases the level of exposure that residents have to individuals without disabilities. Over the years that it has been in place, the Mental Health Services Act Housing Program has produced 42 projects including 934 units in LA County, and the Mental Health Services Act Housing Trust Fund has produced 16 projects including 489 units. Although it is impossible to know what proportion of the 102,088 clients with psychiatric disabilities receiving services from the County need affordable housing, it is highly unlikely that the unmet need exceeds the supply produced through those two programs.

Metropolitan State Hospital is the institution that primarily houses involuntarily confined people with psychiatric disabilities in the region. The facility is located in Norwalk. As of November 7, 2016, 757 individuals resided in Metropolitan State Hospital. Of that population, 41% had been ruled incompetent to stand trial, 39% were involuntarily civilly committed, 15% had been adjudicated not guilty by reason of insanity in criminal proceedings, and 5% had been deemed mentally disordered offenders. Accordingly, roughly 3/5 of the population of the facility was institutionalized because of contact with the criminal justice system, and 2/5 of the population had been civilly committed. The presence of significant numbers of involuntarily civilly committed people with psychiatric disabilities in the region is reflective of unmet needs for affordable housing and supportive services in home and community-based settings. As is discussed in greater detail below, there are evidence-based approaches to meeting the supports needs of people with severe psychiatric disabilities who would appear to meet commitment criteria in the community rather than in institutions.²²⁸

Describe the range of options for people with disabilities to access affordable housing and supportive services in the jurisdiction and region.

The primary options for affordable housing for people with disabilities that are specifically targeted toward people with disabilities are Housing Choice Vouchers, for which HACLA has preferences for people with disabilities and for populations that significantly overlap with people with disabilities,²²⁹ and housing created through the Mental Health Services Act Housing Program. Although the California Housing Finance Agency received an award of Section 811 Project Rental Assistance funds from HUD,²³⁰ none of the developments that received allocations out of those funds are located in the City of Los Angeles and only one, located in

²²⁸ Susan D. Phillips Et Al., *Moving Assertive Community Treatment Into Standard Practice*, 52 PSYCHIATRIC SERVICES 771 (2001) (describing Assertive Community Treatment as an evidence-based practice for meeting the needs of individuals with severe mental illness).

²²⁹ In its Section 8 Administrative Plan, HACLA has waiting list preferences for households receiving assistance through the Housing Opportunities for Persons with AIDS, supportive housing, and veterans programs. This population is, at a minimum, disproportionately comprised of persons with disabilities. Individuals receiving assistance through HOPWA are exclusively persons with disabilities, and no system of waiting list preferences applies to the program.

²³⁰ The Section 811 Project Rental Assistance program provides project-based rental assistance to developments that set aside units for persons with disabilities who need supportive services. In an agency's application to HUD for a Section 811 award, the applicant may specify a more specific subpopulation of persons with disabilities, such as individuals with psychiatric disabilities or individuals with intellectual or developmental disabilities.

Lancaster in the Antelope Valley of Northern Los Angeles County, is in the region. The California Housing Finance Agency's second round of Section 811 Project Rental Assistance was awarded specifically for projects in Los Angeles County, but the agency has yet to announce final awards. Once the units in those prospective developments come online, there will be a significant expansion in the supply of integrated permanent supportive housing.

Although precise data about the supply of housing developed with Section 811 Capital Advances is not available, there is undoubtedly such housing in Los Angeles, falling within the Other Multifamily category in the AFFH Data & Mapping Tool. Such housing is unlikely to be as integrated as is housing developed under the Project Rental Assistance program. As discussed above in connection with the accessibility of affordable housing, the City has settled a lawsuit alleging widespread noncompliance with Section 504 in developments that received funds through the City. As units are retrofitted to comply with the settlement, those 4,000 units will add to the supply of affordable, accessible housing in the City.

Supportive services are primarily provided through programs administered by the regional centers and the Los Angeles County Department of Mental Health. Additionally, particularly for individuals with types of disabilities other than intellectual and developmental disabilities and psychiatric disabilities, services may be available through a range of health care providers, paid by Medicaid, Medicare, or private insurance, or through nursing homes. Payment for supportive services for people with intellectual and developmental disabilities is typically structured as Home and Community-Based Services Medicaid Waivers. These Waivers pay for a wide variety of services necessary to empower individuals to maintain stable residence in home and community-based services. There are, however, only as many Waivers available as there is funding from the federal government and the State of California. Although information about the length of waiver waiting lists is unavailable, many States have long waiting lists for people with intellectual and developmental disabilities seeking services.

The Department of Mental Health also relies heavily on Medicaid funding streams to provide services to people with psychiatric disabilities and is also subject to financial limitation that prevent it from fully assisting all people with psychiatric disabilities who need services. In the 2014-2015 fiscal year, the Department provided Assertive Community Treatment (ACT), which is an evidence-based strategy, to 2,009 clients. ACT can be costly and intensive in relation to other types of supportive services, but its successes are indicative of how individuals with the most severe psychiatric disabilities can thrive in home and community-based settings with the appropriate supports.

Disparities in Access to Opportunity

*To what extent are people with disabilities able to access the following in the jurisdiction and region?
Identify major barriers faced concerning:*

i. Government services and facilities

People with auditory and speech disabilities face significant barriers in accessing emergency services. It takes an estimated three to eight minutes for individuals to be connected via relay services compared to a national standard of being connected within ten seconds for at least 90% of emergency calls.²³¹ This lag has the potential to endanger people with disabilities and their property when threatened by criminal behavior

²³¹ <http://www.motherjones.com/politics/2017/03/text-911-deaf-accessibility-ada-lawsuits-1/>

or fire. It can also result in people with disabilities receiving needed medical care in a less timely fashion than individuals without disabilities.

The Los Angeles Housing and Community Investment Department (HCIDLA) has devoted substantial CDBG funds to making accessibility modifications to a variety of public facilities. In its 2016-2017 Annual Action Plan, HCIDLA included \$2,721,100 in funding for five projects including accessibility modifications to public facilities. More inaccessible facilities remain. From parks and recreation facilities to government office buildings, maintaining accessible government facilities is essential to efforts to reduce segregation by increasing opportunities for people with disabilities to interact with individuals without disabilities and to advance the economic empowerment of people with disabilities through employment opportunities and access to public benefits.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

LA City has widespread issues with inaccessible sidewalks and missing curb cuts. As a result, people with disabilities face difficulties in accessing transportation, schools, and jobs. These issues led to *Willits v. City of Los Angeles*, a major lawsuit under the ADA that the City settled in 2013. Pursuant to the settlement, the City agreed to invest \$1.3 billion over 30 years to make its sidewalks and streets accessible. This Assessment did not reveal accessibility issues relating to other non-sidewalk-related infrastructure shortcomings. The plaintiffs in *Willits* had alleged that nearly half of the City's thousands of miles of pedestrian rights of way were not accessible to people with disabilities and that, if the City would have continued to fund repairs at the rate at which it was doing prior to the settlement, the City would not have been able to address all of the inaccessible pedestrian rights of way for over 80 years.²³²

iii. Transportation

LA Metro operates public transit services in LA City and in the region, including paratransit services for people with disabilities. The agency states that all of its buses, trains, and stations are accessible to people who use wheelchairs and individuals with visual disabilities. This Assessment did not reveal evidence that refutes that claim. Given the state of the City's sidewalks, however, people with disabilities may experience difficulty accessing public transit because of barriers that arise between their homes, workplaces, and other destinations and transit stops. Making accessibility modifications to sidewalks and increasing the size of the public transit system so travelers have shorter distances to go in order to reach buses and trains could help address this situation. Stakeholders at the April 3, 2017 Disability & Access Focus Group have complained that paratransit services offered by Access Services, a component of the Los Angeles County Coordinated Transportation Services Agency, are slow and unreliable thereby limiting access to transit for people with disabilities, particularly those who either live or are traveling to places that are not proximate to bus and rail stops.

Access to private transit services for people with disabilities in Los Angeles appears to be starkly limited. A 2016 report by CNN revealed that, in Los Angeles, there were few accessible UberASSIST and UberWAV cars available with long wait times in locations that typically had many UberX cars nearby.²³³

²³² Complaint at 6, *Willits v. City of Los Angeles*, No. 2:10-cv-05782 (C.D. Cal. Aug. 4, 2010).

²³³ <http://money.cnn.com/2016/05/02/technology/uber-access/>. In theory, UberASSIST vehicles are large enough to accommodate mobility devices such as wheelchairs and scooters, and UberASSIST drivers are trained to help persons with disabilities into vehicles. UberWAV vehicles are equipped with ramps or hydraulic lifts to facilitate wheelchair access. <http://money.cnn.com/2016/05/02/technology/uber-access/>. In theory, UberASSIST vehicles are large enough to accommodate mobility devices such as wheelchairs and scooters, and UberASSIST drivers are

Uber, Lyft, and other ridesharing services, like taxis, are public accommodations that are subject to the accessibility requirements of the ADA.

iv. Proficient schools and educational programs

Children with disabilities are more heavily concentrated in neighborhoods within the City and the region that have low performing schools than are adults with disabilities. At the same time, children with disabilities do not appear to be more concentrated within those neighborhoods than children without disabilities. In other words, the areas within the City and region that have the most children tend to have the least proficient schools, and children with disabilities are not an exception to that rule.

Charter schools have, to some extent, reduced the relationship between where children live and where they attend school; however, at a systemic level, charter schools are failing to provide equal access to students with disabilities. According to the Los Angeles Unified School District (LAUSD), for the 2013-2014 academic year, 3.8% of students enrolled in traditional public schools have severe disabilities as opposed to just 1.2% of students enrolled in charter schools. Additionally, once students with disabilities have matriculated in charter schools, they may encounter barriers to continued enrollment stemming from biased school discipline policies and practices. According to a 2016 report by the University of California Los Angeles (UCLA)'s Center for Civil Rights Remedies, students with disabilities and students of color with disabilities, in particular, are suspended from charter schools in Los Angeles at disproportionate rates. For the charter schools that were reviewed, there was an out-of-school suspension rate of 1.1% for all students as compared to 2.4% for Black students, 1.7% for Latino students, and 4.1% for students with disabilities.²³⁴

Although traditional public schools provide greater access to education for people with disabilities in Los Angeles than do charter schools, students with disabilities have at times been denied their right to a free, appropriate, public education within the Los Angeles Unified School District (LAUSD), as well. Like many other large school districts, LAUSD has been subject to many lawsuits alleging violations of the Individuals with Disabilities Education Act over the years. Specifically, in 1993, civil rights advocates filed a major lawsuit against LAUSD in the name of plaintiff Chanda Smith. The parties entered a consent decree providing for structural reforms in federal court in 1994 to settle the lawsuit. The consent decree, which has been modified multiple times, is still in place. The law suit alleged that LAUSD's special education policies and practices were in violation of the Individuals with Disabilities Education Act with respect to identification, tracking of student records, and placement. The implementation of the consent decree has dramatically increased access to education for people with disabilities with graduation rates for students with disabilities almost doubling between 2003 and 2016.

v. Jobs

People with disabilities experience pronounced difficulties in accessing gainful employment in LA City and the broader region. According to the 2011-2015 American Community Survey 5-Year Estimates, just 25.5% of noninstitutionalized people with disabilities age 16 and over in the City were in the labor force with only 20.9% employed. In the region, those figures are 24.4% and 20.4%, respectively. Although the American Community Survey does not facilitate the further disaggregation of this data by age and the elderly population is disproportionately comprised of people with disabilities, this data still paints an

trained to help persons with disabilities into vehicles. UberWAV vehicles are equipped with ramps or hydraulic lifts to facilitate wheelchair access.

²³⁴ <https://www.civilrightsproject.ucla.edu/resources/projects/center-for-civil-rights-remedies/school-to-prison-folder/federal-reports/charter-schools-civil-rights-and-school-discipline-a-comprehensive-review>.

extreme picture. By contrast, 72.1% of noninstitutionalized people age 16 and over who do not have disabilities in LA City were in the labor force. In the region, 70.4% of such individuals were in the labor force.

Table 7 2016 Employment Metrics for Adults with Intellectual and Developmental Disabilities by Regional Center

Regional Center	Percentage of Adults Earning Below Minimum Wage	Percentage of Consumers with Earned Income	Percentage of Adults with a Paid Job in a Community-Based Setting	Percentage of Adults with Integrated Employment As a Goal in Their Individual Program Plan	Percentage of Adults Currently Unemployed But Wanting a Job in the Community
State Average	57%	14.2%	13%	27%	45%
Frank D. Lanterman Regional Center	57%	10.3%	10%	24%	55%
East Los Angeles Regional Center	56%	10.8%	13%	33%	49%
San Gabriel/Pomona Regional Center	75%	8.6%	7%	14%	31%
Regional Center of Orange County	52%	19.8%	18%	33%	47%

Data from the regional centers is reflective of the difficulties faced by individuals with intellectual and developmental disabilities in securing gainful employment in LA. Of the eight regional centers in the region, just four include data on employment outcomes in their annual performance reports. Of those four regional centers, all but the Regional Center of Orange County lag statewide averages in most key indicators of whether people with intellectual and developmental disabilities have access to integrated employment, whether that employment is truly remunerative, and the degree to which the service planning process for individuals is identifying integrated employment as a goal. The Frank D. Lanterman Regional Center is the only one of the four that serves LA City, and the data for it is suggestive of significant barriers to access to employment. In the service area of the San Gabriel/Pomona Regional Center, the low percentage of adults who are currently unemployed but who want jobs in the community may reflect an unmet need for education about the feasibility and value of supported employment.

For the 2014-2015 fiscal year, the Los Angeles County Department of Mental Health reported significant increases in access to employment for people with psychiatric disabilities. Among Full Service Partnership clients, there was a 55% increase in the number of days competitively employed, a 93% increase in the number of days spent in supported employment, a 141% increase in the number of clients receiving supported employment services, a 93% increase in the number of days clients had paid in-house employment, and a 41% increase in the number of clients in paid in-house employment. The only category for which there was a modest percentage decrease was in days spent unemployed. Although this is very encouraging, the percentage increases across a broad range of categories in part reflect an increase in the number of clients receiving services as much as they do the transition of unemployed current clients to employment. Additionally, days spent unemployed by clients continued to constitute a plurality of all days.

Clearly, progress in increasing access to employment for people with psychiatric disabilities is occurring against a backdrop of longstanding disparities in access.

Describe the processes that exist in the jurisdiction and region for people with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

i. Government services and facilities

LA City has a Department on Disability, which is led by the City's ADA Compliance Officer. The Department is responsible for ensuring the accessibility of City programs and activities. The City acknowledges that it has a duty to provide reasonable accommodations. Additionally, other City Departments, such as the Planning Department and the Library, have their own reasonable accommodation processes and publicize those processes on their websites. This practice, however, is highly uneven across City agencies.

With respect to slow response times for emergency services calls via relay service, the lack of accessibility at issue is not one that a reasonable accommodation or modification would be helpful to address. Instead, there is a need for the consistent and well-staffed implementation of existing policies and practices.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

LA City has created an online portal through MyLA311 to enable people with disabilities to report inaccessible sidewalks and intersections as part of its \$1.4 billion investment in increasing accessibility. The City also has a rebate program that refunds property owners for a portion of the cost of sidewalk repairs undertaken by the owners.

iii. Transportation

There is a link to a comprehensive Accessibility page on the main page of the LA Metro's website. That page describes the accessibility features of the system, provides information about how to request a reasonable accommodation or modification, and provides information about applying to receive paratransit services. As with emergency response times, ensuring timely paratransit service is more a matter of investing adequately in the implementation of existing policies and practices rather than changing any existing neutral policies or practices. The process for requesting accessibility repairs and modifications to inaccessible sidewalks, which limit access to transportation for people with disabilities, is described above.

Uber has a dedicated, easily findable Accessibility page on its website. The page describes the efforts that the company undertakes to serve people with disabilities. The site does not, however, inform users of how they can request accommodations and characterizes the obligation to comply with disability rights laws as falling on Uber drivers as independent contractors rather than on the company itself. Lyft does not have a dedicated page describing its efforts to ensure accessibility, instead burying what limited relevant information is on the company's website on multiple hard to find pages including its general anti-discrimination page and pages specific to service animals and wheelchairs. None of these pages outline how individuals should go about making accommodations requests.

iv. Proficient schools and educational programs

The Los Angeles Unified School District's website has a dedicated page for its Educational Equity Compliance Office. This page includes information about students' rights under Section 504 and the Individual with Disabilities Education Act and about how they can make accommodations requests and

appeal denials of such requests. Additionally, the website describes how individuals can request accessible versions of any website content that is inaccessible. By contrast, many charter schools lack easily findable information about the rights of students with disabilities on their websites.

v. Jobs

The City of Los Angeles Personnel Department's website lacks easily accessible information about how the Department receives and processes reasonable accommodation requests. Such information is available in the Department's Personnel Policies, but this document is a PDF that is over a hundred pages long. The availability of information about private sector employers' reasonable accommodation policies is uneven. Data on the size of employers' workforces is generally reported by County rather than by City. In LA County, the largest private sector employers include Kaiser Permanente, Northrop Grumman, Target, Providence Health & Services, and the University of Southern California (USC). Kaiser Permanente has an easily findable link to information for potential job applicants with disabilities on the front page of its Jobs website. The Disability page includes well organized information about the company's commitment to hiring people with disabilities and the process for requesting reasonable accommodations. There is a link to a Workplace Accommodations page from the Careers page on the Northrop Grumman. The link is not emphasized, but, once a prospective employee has navigated to the Workplace Accommodations page, they can see the company's Accessibility Statement and learn how to request an accommodation. Information about Target's reasonable accommodations policy and outreach efforts to people with disabilities, if any, is not available on the company's Careers site. The Jobs site of Providence Health & Services has a link to its Equal Employment Opportunity (EEO) Statement and Applicant Notices. The link is not emphasized, and the Equal Opportunity page to which it links has only very meager information about the process for requesting accommodations. The Careers website of the University of Southern California has a full equal opportunity statement, including information about accommodations requests, at the bottom of the page. That statement, however, is in small type, and the information provided is not detailed.

Describe any difficulties in achieving homeownership experienced by people with disabilities and by people with different types of disabilities in the jurisdiction and region.

The American Community Survey does not disaggregate disability status by housing tenure. Accordingly, it is not possible to precisely determine the homeownership rate for people with disabilities. Additionally, this Assessment did not reveal any local studies on homeownership among people with disabilities or lending discrimination against people with disabilities in LA City or the broader region. Nonetheless, based on the age distribution of people with disabilities and the socioeconomic status of people with disabilities, two conclusions seem likely. First, it is unlikely that people with disabilities, overall, have significantly lower homeownership rates than the general public because people with disabilities are disproportionately elderly and homeownership rates are highest among elderly households. 57.9% of householders age 65 years and over are homeowners as opposed to just 32.0% of householders under the age of 65. Second, among nonelderly people with disabilities, it is likely that homeownership is significantly lower than among nonelderly people who do not have disabilities because nonelderly people with disabilities are disproportionately low-income. Nationally, people with disabilities often face specific barriers in the mortgage lending process, including disparate treatment by mortgage brokers and failures to treat disability income as income. Despite the shortcomings in the California Fair Employment and Housing Act's source of income protections, as interpreted by the courts, that law unambiguously prohibits discrimination in mortgage lending on the basis of receipt of Supplemental Security Income or Social Security Disability

Income. Thus, people with disabilities have more protection from lending discrimination in California than they do in many other states.

Disproportionate Housing Needs

Describe any disproportionate housing needs experienced by people with disabilities and by people with certain types of disabilities in the jurisdiction and region.

As with mortgage lending disparities, limited data is available on the extent to which people with disabilities face disproportionate housing needs. The American Community Survey does not disaggregate data relating to overcrowding, incomplete plumbing and kitchen facilities, and cost burden by disability status. Given the age distribution of people with disabilities, it would seem to be unlikely that people with disabilities are disproportionately subject to overcrowding. Just 3.7% of households with elderly heads of household are overcrowded while 15.7% of households with nonelderly heads of household are overcrowded. By contrast, in light of the relatively low earnings of people with disabilities, it is likely that people with disabilities are disproportionately subject to cost burden and severe cost burden.

Additional Information

Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting people with disabilities with other protected characteristics.

This Assessment has made extensive use of local data throughout the Disability and Access section. The sources of data other than HUD-provided data are noted where appropriate.

The program participant may also describe other information relevant to its assessment of disability and access issues.

HCIDLA uses a portion of its CDBG funds for its Handyworker program, which provides small grants to homeowners who are elderly or people with disabilities to pay for repairs that increase accessibility or address safety issues. The grants are currently capped at \$5,725 per low-income applicant, so, while useful, the program may not provide sufficient assistance to address all of the modification needs of households facing especially significant barriers. Additionally, the total amount of CDBG funding for the program has decreased over time. For the 2013-2014 Program Year, HCIDLA allocated \$2,929,610. For the 2016-2017 Program Year, HCIDLA allocated \$2,352,574. This is a 19.7% reduction. It is explained in part, but not entirely, by an overall decrease of 6.7% in the City's CDBG allocation over that time. The Handyworker program does not address the needs of tenants in private rental housing, including low-income tenants living in rent controlled units, for accessibility modifications.

Data from HCIDLA for April 1, 2015 through March 30, 2016 shows that the City served 135 households through the Handyworker Program. Of those, the data shows that 125 households had elderly householders while 10 contained people with disabilities. It appears that, in collecting this data, senior households and households including people with disabilities were treated as mutually exclusive categories. There is, however, significant overlap between the population of seniors and the population of people with disabilities. Although the data raises concerns that the Handyworker program may be underserving

nonelderly households that include people with disabilities and that could benefit from accessibility modifications, it is highly unlikely that the program is underserving people with disabilities to the extent suggested by the data. By collecting and maintaining more nuanced data going forward, HCIDLA could position itself to better assess the civil rights impact of the Handyworker program.

Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

Access for people with disabilities to proficient schools

Access for people with disabilities to proficient schools is a significant contributing factor to disparities in access to opportunity for people with disabilities in LA. Children with disabilities in LA City are not concentrated in particular neighborhoods or sections of the City so any lack of access to proficient schools that they face is not linked to residential patterns. The proliferation of charter schools in LA City, however, risks leaving students with disabilities behind and creating a two-tiered system in which children who do not have disabilities have access to a higher quality of education than those with disabilities. According to the Los Angeles Unified School District, for the 2013-2014 academic year, 3.8% of students enrolled in traditional public schools had severe disabilities as compared to just 1.2% of students in charter schools. There has been an aggressive push from major philanthropists to increase the proportion of students in Los Angeles who are educated in charter schools. Additionally, according to a 2016 report by UCLA's Center for Civil Rights Remedies, students with disabilities, and students of color with disabilities, in particular, are suspended from charter schools at disproportionate rates in LA.²³⁵ Barriers to enrollment in and continued matriculation at charter schools for people with disabilities contribute to disparities in access to proficient schools for people with disabilities.

Access to Publicly Supported Housing for people with disabilities

Access to Publicly Supported Housing is a significant contributing factor to segregation and disproportionate housing needs among people with disabilities in LA. Households that include people with disabilities make up a slightly larger share of the households living in Public Housing, Project-Based Section 8, and Other Multifamily housing than they do of all households in Los Angeles. They make up a significantly larger share of Housing Choice Voucher holders than they do of all households. At the same time, people with disabilities tend to have much lower incomes than individuals who do not have disabilities, so their level of access to Publicly Supported Housing other than Housing Choice Vouchers may reflect the existence of barriers to access. HACLA does have a preference for the public housing program for people with disabilities.

²³⁵ Daniel J. Losen et al., *Charter Schools, Civil Rights and School Discipline: A Comprehensive Review* (Mar. 16, 2016), <https://civilrightsproject.ucla.edu/resources/projects/center-for-civil-rights-remedies/school-to-prison-folder/federal-reports/charter-schools-civil-rights-and-school-discipline-a-comprehensive-review>.

Access to transportation for people with disabilities

Access to transportation for people with disabilities, specifically with respect to ridesharing services, is a significant contributing factor to disparities in access to opportunity for people with disabilities. As with access to proficient schools, the lack of significant observable patterns of concentration of people with disabilities suggests that barriers to access to transportation for people with disabilities do not flow from their place of residence. LA Metro, which operates bus and rail services in the City, claims that all of its buses, trains, and stations are accessible to people who use wheelchairs and individuals with visual disabilities. The primary barriers to accessing LA Metro's rail and bus service appear to be the distance between where people with disabilities live and stops and inaccessible sidewalks between places of residence and stops. The distance between places of residence and stops may decrease as the build-out of expanded rail service continues. HCIDLA is investing CDBG funds in accessibility modifications to sidewalks in multiple neighborhoods. Targeting those investments near transit stops may be advisable. Stakeholders at the Disability and Access Focus Group held on April 3, 2017 noted that the slowness and unreliability of paratransit services is a barrier to access to transportation for people with disabilities. An attendee of a community meeting in South LA shared their story of DASH bus drivers not waiting for people who use wheelchairs to board the bus and of the service not responding adequately to complaints. Ridesharing services have been slow to meet their obligation under the ADA to provide access to their services. A 2016 report by CNN revealed that there were few accessible UberASSIST and UberWAV cars available and with long wait times in locations that typically had many UberX cars nearby.²³⁶

Inaccessible government facilities or services

Inaccessible government services and facilities are a significant contributing factor to disparities in access to opportunity for people with disabilities. Accessibility problems limit the housing choices of people with disabilities, further limit their ability to seek out and receive housing-related assistance, and limit access to education, jobs, and recreation. Although the City has taken strides toward improving accessibility to government services and facilities, there still remains progress to be made. In its five-year Consolidated Plan and the subsequent annual action plans, the City dedicated portions of its CDBG funds to upgrading community services centers. Central City Neighborhood Partners and Bradley Milken Family Source Center were among several service organizations that received funding to make their restrooms, elevators, and front entrances ADA compliant. In terms of recreational areas, the distribution of Universally Accessible Playgrounds roughly coincides with the distribution of people with disabilities in general and also with people with disabilities in the age range of 5-17. However, this pattern of improvement has not been consistent across all areas of government services and facilities. In the field of education, the Los Angeles Unified School District has been the subject of numerous allegations of disability discrimination. A court-appointed independent monitor of the school district also reported in 2015 that school facilities were still insufficient to meet the needs of students with disabilities. Additionally, even the improvements that the City has planned largely address mobility disabilities rather than hearing, vision, or cognitive disabilities.

Inaccessible public or private infrastructure

Inaccessible public and private infrastructure are a significant contributing factor to disparities in access to opportunity for people with disabilities, limiting, in particular, access to transportation, employment, and retail. In the public realm, the City has made a concerted effort to improve the accessibility of its streets. In the 2013 Consolidated Plan, HCIDLA dedicated a portion of the City's CDBG funding to improve curb ramps and sidewalks, especially around public facilities like schools and transportation stops. While part of

²³⁶ <http://money.cnn.com/2016/05/02/technology/uber-access/>

the impetus for these infrastructure improvements was public comments and studies conducted by the City, many concessions had to be won through lawsuits brought by advocacy groups and people with disabilities. In 2013, as part of a settlement in an ADA lawsuit, the City agreed to invest \$1.3 billion over the next thirty years to fix its broken sidewalks and otherwise improve disability access to public pathways.

In the private realm, there has been a growing backlash against ADA lawsuits perceived as “drive-by” litigation motivated by profit rather than actual need despite the lack of any evidence that ADA enforcement is having unintended consequences. California representatives at both the State and Federal level have introduced bills that would make it more difficult for individuals to bring ADA lawsuits. At the Federal level, Representatives from California have introduced two separate House resolutions requiring complainants to provide 90 to 120 days’ notice before filing suit against places of public accommodation. At the State level, Senators have introduced two bills that would similarly impose a written notice requirement and create a 120-day grace period for some defendants. These legislative responses to ADA lawsuits may hinder efforts to promote accessibility in the businesses that provide access to employment and public accommodations to residents of LA.

Lack of access to opportunity due to high housing costs

The location of accessible and affordable housing is a significant contributing factor for disparities in access to opportunity for people with disabilities in LA. The types of housing that are most likely to be accessible to people with disabilities include multi-family housing that is subject to the design and construction requirements of the Fair Housing Amendments Act of 1988 as well as housing that has received federal financial assistance and is subject to the requirements of Section 504 of the Rehabilitation Act of 1973. Both types of housing exhibit patterns of concentration. The areas with the highest concentrations of multi-family housing in the City are Downtown LA; neighborhoods immediately to the West of Downtown such as Pico-Union, Westlake, and Koreatown; the Hollywood flatlands; and scattered throughout the San Fernando Valley. The distribution of Publicly Supported Housing in LA varies somewhat with much more located in neighborhoods in South and East LA, along with the neighborhoods mentioned above except for those in the Valley, where there is comparatively little Publicly Supported Housing.

These geographic patterns have significant effects on the manner in which people with disabilities experience fair housing issues. The neighborhoods that are likely to have more accessible and affordable housing tend to have low levels of access to school proficiency, greater exposure to poverty, and reduced environmental health. Access to transit and jobs, however, is not disproportionately low. By contrast, the Valley, with a relative abundance of new multi-family housing but little Publicly Supported Housing, has reduced transit and job access but higher performing schools and greater environmental health. East and South LA have lower levels of access to opportunity across a range of indicators. Housing cost burden is extremely high in Downtown, the neighborhoods to the West of Downtown, and the Hollywood flatlands. These neighborhoods, with the exception of the Hollywood flatlands, also include several R/ECAPs.

Lack of affordable in-home or community-based supportive services

Lack of affordable in-home or community-based supportive services is a significant contributing factor to segregation for people with disabilities in Los Angeles. Through Medi-Cal and the California Department of Developmental Services, California offers an array of waivers and other funding mechanisms to pay for in-home or community-based services for people with disabilities. In some respects, California is a leader in maximizing resources for supportive services and in increasing the percentage of people with disabilities who need supportive services who receive those services outside of institutions. For example, in 2015, 58%

of all individuals nationwide enrolled in Medicaid Section 1115 Managed Long-Term Services and Supports (MLTSS) Waivers were Californians, and 92% of enrollees in California received services in home and community-based settings, the highest percentage of any State operating that waiver program.²³⁷ The MLTSS Waiver incorporates managed care principles into a waiver program. This aspect of the program has the potential to reduce costs and increase the number of Angelenos who have access to waiver-funded services. On the other hand, managed care can constrain the degree of choice that people with disabilities can exercise when deciding between providers. The Los Angeles County Department of Mental Health provides services to people with psychiatric disabilities in LA City, including through Assertive Community Treatment Programs, which are effective means of ensuring stable community integration for individuals who need intensive supportive services. Data on the breadth of those efforts is limited. Previous shortcomings in the County's provision of services to children with psychiatric disabilities in the child welfare system led to the *Katie A. v. Bonta* lawsuit, which was resolved in a landmark settlement agreement that transformed the provision of services in the County. Despite California's progress in increasing access to supportive services relative to other states, not all Angelenos who need home and community based services can currently access them for two reasons. First, although available waiting list data is limited, there appear to be waiting lists for the receipt of some funding streams. Second, the State of California may not use federal Medicaid dollars to provide services to undocumented immigrants. For undocumented residents of LA, who are disproportionately among the City's lowest income residents, supportive services may be out of reach. Outside of publicly funded systems like Medi-Cal, supportive services are likely to be too expensive for low-income people with disabilities.

Lack of affordable, accessible housing in a range of unit sizes

Lack of affordable, accessible housing in a range of unit sizes is a significant contributing factor to segregation and disproportionate housing needs, particularly with respect to cost burden, in LA. There is an overall shortage of affordable housing in LA, and the effects of that shortage are particularly acute for people with disabilities. Additionally, a significant portion of the affordable, accessible housing in LA City consists of Single-Room Occupancy (SRO) units and one-bedroom and studio units in more integrated developments with a permanent supportive housing component. These units meet critical needs, but may not provide access to affordable housing for families including people with disabilities or for people with disabilities who need the services of a live-in aide, which is a frequent grounds for reasonable accommodations requests by Housing Choice Voucher holders. Available data does not reflect the extent to which multi-family construction in the private market since 1991 has met the needs of people with disabilities who require multi-bedroom units. Such developments may include affordable owner-occupied units as a result of inclusionary zoning or affordable rental units as a result of a density bonus. Lastly, the settlement agreement in *Independent Living Center of Southern California v. City of Los Angeles*, which was agreed to in August 2016, requires the City retrofit 4,000 units of affordable rental housing that received City assistance to comply with the Uniform Federal Accessibility Standards. HCIDLA created its Accessible Housing Program to carry out its obligations under the agreement. If effectively implemented, this program should help fill the gap in affordable, accessible housing in a range of unit sizes.

In 2016, voters in LA County passed Measure H and voters in the City of Los Angeles passed Proposition HHH. Together, these ballot measures could provide bond financing to support the construction of 10,000 units of permanent supportive housing. This represents a massive infusion of resources to close the gap between the need affordable, accessible housing in a range of unit sizes and the supply.

²³⁷ <http://files.kff.org/attachment/Report-Medicaid-Section-1115-Managed-Long-Term-Services-and-Supports-Waivers>

Lack of affordable, integrated housing for individuals who need supportive services

Lack of affordable, integrated housing for individuals who need supportive services is a significant contributing factor to segregation and disproportionate housing needs, particularly with respect to cost burden, in LA. Both HACLA and LA City provide significant support for Housing First programs that do not condition occupancy on compliance with substance abuse or mental health treatment regimens. Housing First is an evidence-based practice for addressing chronic homelessness and an important strategy for increasing access to affordable, integrated housing for individuals who need supportive services. People with psychiatric and substance abuse disabilities and people with intellectual and developmental disabilities are among those who are most likely to need supportive services. The programs that are currently operating in LA City primarily address the needs of the former groups for affordable, integrated housing but not those of the latter. Additionally, as evidenced by the allocation of Mental Health Services Act housing program funds, many developments, typically run by non-profit organizations that provide permanent supportive housing to people with disabilities are entirely comprised of units for special needs populations. Although housing in such buildings is more integrated than nursing homes and group homes, a deconcentrated model of providing assistance through tenant-based rental assistance or by setting aside 10% to 25% of units in a development for people with disabilities is more consistent with the community integration mandate of the Americans with Disabilities Act. Permanent supportive housing units are also highly concentrated in Skid Row and in other neighborhoods near Downtown that include R/ECAPs and offer limited access to opportunity for residents. Lastly, although HACLA and the City have made impressive strides in implementing Housing First programs, as of the 2017 Point-In-Time Count, there were over 25,237 unsheltered homeless individuals in LA City. Of those, 37.6% had a serious mental illness, and 8.3% had a developmental disability.²³⁸ Clearly, there is an unmet need for affordable, integrated housing for individuals who need supportive services. Expanding target populations to include people with intellectual and developmental disabilities, prioritizing developments where no more than 25% of units are set aside for people with disabilities, and scattering units across a broader range of neighborhoods would help ensure that HACLA and the City effectively address fair housing issues as they bring their efforts to scale.

Lack of assistance for housing accessibility modifications

Lack of assistance for housing accessibility modifications is a significant contributing factor to segregation for people with disabilities in Los Angeles. HCIDLA uses a portion of its CDBG funds for its Handyworker program, which provides small grants to homeowners who are elderly or people with disabilities to pay for repairs that increase accessibility or address safety issues. Support for the Handyworker program has declined as CDBG allocations from the federal government have declined thus making it more difficult for the City to meet the need for assistance for housing accessibility modifications. The gap between the need for funding for accessibility modifications and the amount of assistance that is available contributes to segregation when people with disabilities end up residing in nursing homes because they are unable to navigate their homes. Additionally, available data paints an ambiguous picture as to whether the program is adequately serving people with disabilities as opposed to concentrating resources on senior households that do not include people with disabilities. Improvement data collection methods could resolve this issue for the long term though, in the short term, additional outreach to non-elderly people with disabilities about the benefits of the program may be warranted. There is also an almost complete lack of assistance available for accessibility modifications in private rental housing.

²³⁸ <https://www.lahsa.org/documents?id=1371-2017-homeless-count-results-city-of-los-angeles.pdf>

Lack of assistance for transitioning from institutional settings to integrated housing

Lack of assistance for transitioning from institutional settings to integrated settings is a significant contributing factor to the segregation of people with disabilities in LA. Since 2007, the California Department of Health Care Services has operated its California Community Transitions project, which is designed to assist Medi-Cal beneficiaries who are long-term residents of state-licensed health care facilities to home and community-based settings. The program is a Medicaid demonstration program and is approved through 2020. The program funds costs like household set-up costs, home modifications, vehicle adaptations, and assistive devices that may not be covered by housing subsidies or other Medicaid funding streams. Non-profit organizations including the Independent Living Center of Southern California, Southern California Resource Services for Independent Living, Communities Actively Living Independent & Free, and the Westside Independent Living provide services to individuals who are transitioning to home and community-based settings. Additionally, the Regional Centers serving LA City, including the North Los Angeles County Regional Center, the South Central Los Angeles Regional Center, and the Westside Regional Center, provide services that aid people with developmental disabilities in transitioning from institutional settings. At this juncture, robust data on the adequacy of existing efforts to provide assistance for transitioning from institutional settings to integrated housing is not available. Preliminarily, it appears likely that the correct pieces are in place to facilitate transitions, but the scale of those efforts may need to be expanded.

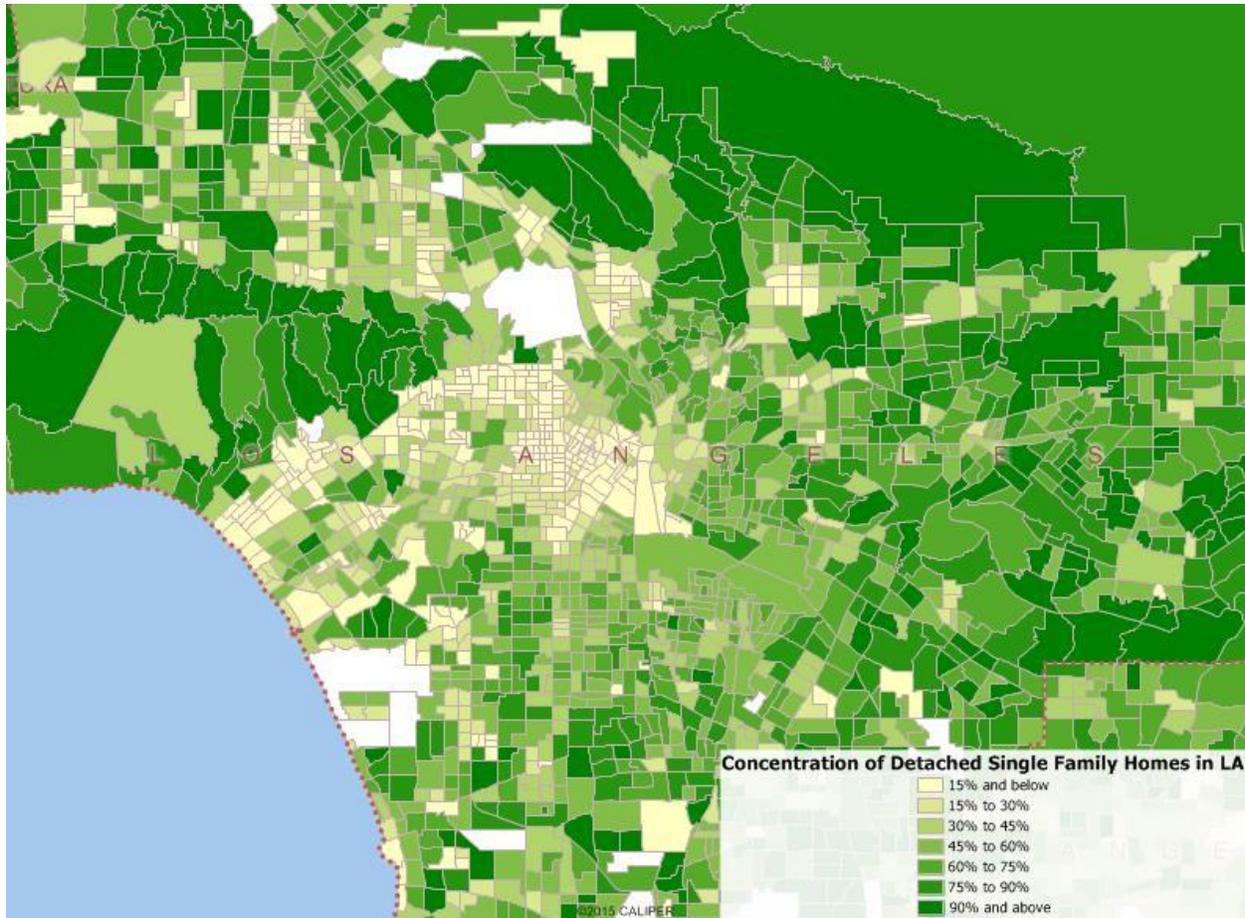
Lack of local or regional cooperation

A lack of local or regional cooperation is a contributing factor to segregation for people with disabilities in LA City and the region as a whole. The infrastructure that exists to facilitate regional cooperation through the Southern California Association of Governments and the Los Angeles Homeless Services Authority (LAHSA) may not be as focused on the implementation of the ADA's community integration mandate as they are on large scale transportation and land use planning needs and outside of the homeless services context. There is an unmet need for greater coordination between agencies, such as the regional centers and county mental health departments that administer Medicaid-funded supportive services, service providers, and affordable housing stakeholders to ensure that people with disabilities who are not homeless or at risk of homelessness are able to live in the most integrated setting appropriate to their needs and consistent with their informed choice.

Land use and zoning laws

Land use and zoning laws are a significant contributing factor to disparities in access to opportunity for people with disabilities in LA City and the broader region. As the map below shows, some neighborhoods within LA have much higher concentrations of detached single-family homes than the City as a whole. In particular, neighborhoods in West LA and the San Fernando Valley that are adjacent to the Santa Monica Mountains have high concentrations of detached single-family homes at the census tract-level, sometimes exceeding 90%. These neighborhoods include parts of Bel Air, Brentwood, and Pacific Palisades in West LA and parts of Encino, Tarzana, and Woodland Hills in the Valley, among other areas. Such development patterns are influenced by a wide variety of factors but tend to overlap with residential zoning districts that are restricted to detached single-family homes. At the same time, much of Downtown and East LA, as well as parts of South LA that are relatively close to Downtown, have low concentrations of detached single-family homes. Exceptions to these general trends are numerous, and there are parts of West LA and the Valley that have multi-family housing, as well as parts of Downtown and East LA that have single-family homes. Nonetheless, strategically upzoning portions of communities in West LA and the Valley, which are areas of high opportunity near the Santa Monica Mountains would, by resulting in publicly-created value,

incentivize property owners to develop multi-family housing. Where traditional multi-family housing is not feasible because of topography, increased density could take the form of two to four unit dwellings that are designed similarly to single-family homes. Montgomery County, Maryland has successfully integrated affordable housing into what are otherwise detached single-family neighborhoods by having developers include duplexes that resemble single-family homes. That development would contribute to a more balanced housing stock in those neighborhoods and would create opportunities to foster residential integration within those neighborhoods, which are heavily non-Hispanic White. Increased integration would be particularly likely to result if affordable housing was provided on-site at new multi-family developments in those neighborhoods.



While the City has taken some steps to encourage inclusionary zoning, these initiatives have various shortcomings. For example, Measure JJJ, which provides incentives for developers to include affordable units, contains an in-lieu provision allowing developers to construct the affordable units off-site, or acquire off-site at-risk affordable units. This option may allow developers to concentrate affordable housing in already segregated areas whereas affordable housing must be provided on-site if there is no in-lieu fee option. Finally, multiple dwelling zones, like one-family dwelling zones, require a set-aside of parking spaces based on the number of habitable rooms in the zone. Given that households below the poverty line are proportionally less likely to use a car to commute to work, these parking space requirements may hinder the development of larger multi-family projects. Re:code LA, an initiative to revise LA's zoning code, is considering altering parking requirements based on the context of the zone.

The City has also worked within the confines of unfavorable court decisions to foster the development of affordable housing through inclusionary zoning. Although the City is barred from mandating the inclusion of affordable rental units in residential developments by a judicial decision, the City uses its Density Bonus program to incentivize the inclusion of affordable rental units. The City also created an Expedited Permitting Section in its Department of City Planning to facilitate affordable housing development.

Lending discrimination

This Assessment did not reveal anecdotal evidence of lending discrimination against people with disabilities, and Home Mortgage Disclosure Act (HMDA) data does not break down applicants by disability status. As a result, it is not possible to conclude whether or not lending discrimination is a contributing factor for any of the fair housing issues faced by people with disabilities. Nonetheless, the City should keep in mind that lending discrimination is often subtle and need not be intentional in order to violate the Fair Housing Act. For example, people whose income is primarily from Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) (collectively, Social Security Disability Income) have been treated differently than others when seeking a mortgage. In 2014, the Consumer Financial Protection Bureau provided guidance to lenders to help prevent discrimination against Social Security disability income recipients. The City should be sensitive to any future reports of lending discrimination against people with disabilities.

Location of accessible housing

The location of accessible housing is a significant contributing factor for disparities in access to opportunity for people with disabilities in LA. The types of housing that are most likely to be accessible to people with disabilities include multi-family housing that was first occupied in 1991 or later and is subject to the design and construction requirements of the Fair Housing Amendments Act of 1988 and housing, including both single-family and multi-family housing, regardless of when it was built, that has received federal financial assistance and is subject to the requirements of Section 504 of the Rehabilitation Act of 1973 which sometimes lead to the retrofitting of units. Both types of housing are subject to patterns of concentration. The areas with the highest concentrations of multi-family housing in the City are Downtown Los Angeles; neighborhoods immediately to the west of Downtown such as Pico-Union, the Westlake District, and Koreatown; the Hollywood flatlands; and scattered throughout the San Fernando Valley. These areas were all largely developed before 1991 though all have seen significant infill development in more recent years. The distribution of Publicly Supported Housing in LA varies somewhat with much more located in various neighborhoods in South LA and East LA, where there are few apartment buildings in the private housing stock, along with the neighborhoods mentioned above except for those in the Valley, where there is comparatively little Publicly Supported Housing. The ADA and the Building Code also provide overlapping accessibility requirements but do not affect the analysis of where accessible housing is located.

These geographic patterns have significant effects on the manner in which people with disabilities experience fair housing issues. The neighborhoods that are likely to have more accessible housing in light of both indicators tend to have low levels of access to school proficiency, low poverty neighborhoods, and environmentally healthy neighborhoods. Access to transit and jobs, however, is not disproportionately low. By contrast, the Valley, with a relative abundance of new multi-family housing but little Publicly Supported Housing, has reduced transit and job access but higher performing schools and greater environmental health. East and South LA have lower levels of access to opportunity across a range of indicators. Housing cost burden is extremely high in Downtown, the neighborhoods to the west of Downtown, and the

Hollywood flatlands. These neighborhoods, with the exception of the Hollywood flatlands, also include several R/ECAPs.

Loss of Affordable Housing

Loss of affordable housing in LA could likely exacerbate disproportionate housing needs.²³⁹ Currently, 375,055 households in the City experience severe housing cost burden. Within both LA City and the broader region, most racial or ethnic minority groups experience higher rates of housing problems, including but not limited to severe housing cost burden, than do Non-Hispanic White households. The only exception to this is the Asian Pacific Islander population, which experiences higher rates of housing problems than Non-Hispanic White households but lower rates of severe housing cost burden. Among all racial or ethnic groups, Hispanic households are most likely to experience severe housing problems and Black households are most likely to experience severe housing cost burden.

HUD-provided data indicates that 58.79% of households within the City of Los Angeles are experiencing any of the four key housing needs.²⁴⁰ Black and Hispanic households are particularly impacted with 90,575 (61.8%) Black households and 338,720 (71.88%) Hispanic households confronted by one or more of the four housing problems defined by HUD.

With the loss of affordable housing units, low-income residents (disproportionately consisting of Blacks and Hispanics living in R/ECAPs and majority-minority neighborhoods) may have no option but to increase their housing problems by “doubling up” or renting sub-standard homes.

Also, of the 375,055 households experiencing severe housing burdens, 214,169 are family households. However, there are only 33,411 Publicly Supported Housing units with more than one bedroom capable of housing these families. Although the Public Housing program supports households in a balanced mix of unit sizes, other types of publicly supported housing are skewed toward 0-1 bedroom units. Given the lack of available, affordable multi-family housing units in the City, it is clear that the existing stock of Publicly Supported Housing is underserving families with children, with families of five or more members experiencing housing problems at the highest rate. To counteract this trend, the City cannot simply preserve and replicate the current stock of predominantly 0-1 bedroom affordable units. Instead, the City must ensure that new multi-bedroom affordable housing units are developed at a significantly higher rate than currently exist.

As part of Measure JJJ’s community plan requirement, the plan must ensure that there is no loss of affordable housing units through transit-oriented development investments. The implementation of this planning requirement will be important to efforts to reduce the loss of affordable housing.

²³⁹ Meaning “a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of members of any other relevant groups or the total population experiencing that category of housing need in the applicable geographic area.” Categories of housing needs include (severe) cost burden, overcrowding, and substandard housing. (AFFH Rule Guidebook p. 79-80)

²⁴⁰ The four housing needs/problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and cost burden greater than 50%.

Occupancy codes and restrictions

Occupancy codes and restrictions are not a significant contributing factor to accessibility problems in LA City though they may contribute to fair housing issues in the region as a whole. The City's general Municipal Code does not contain unusually restrictive occupancy codes. Although there may be group living arrangements for people with disabilities that could be deterred by the City's occupancy limit, the Department of City Planning's reasonable accommodations policy should allow those arrangements when needed. In 2015, the City of Newport Beach, in Orange County, settled a longstanding lawsuit challenging a local ordinance restricting sober living facilities. In 2013, the U.S. Court of Appeals for the Ninth Circuit held that the plaintiff, a group home operator, had alleged sufficient facts for its claims to proceed to trial.²⁴¹

Regulatory barriers to providing housing and supportive services for people with disabilities

Regulatory barriers to providing housing and supportive services for people with disabilities are a significant contributing factor to the segregation of people with disabilities. The primary regulatory barrier to providing housing and supportive services for people appears to be the inadequacy of the rates that Medi-Cal service providers are allowed to bill the state. The Independent Living Center of Southern California challenged those rates in a lawsuit that ultimately went all of the way to the U.S. Supreme Court in 2012.²⁴² The Court ultimately did not address whether Medi-Cal's rates were adequate, and, in a subsequent decision, the Supreme Court limited the ability of private plaintiffs to challenge Medicaid rates in the courts.²⁴³ Accordingly, in some instances, Medi-Cal rates may not be adequate to ensure that people with disabilities have access to the breadth of services that would enable them to live in the most integrative setting consistent with their needs. Inadequate rates may not only make the difference between an individual residing in an institution or in the community, they may make the difference between living in a group home and in their own home. If costs like travel time are not adequately compensated for providers, then providers may concentrate their activities around group homes in order to minimize undercompensated time.

Secondarily, HACLA conducts criminal background screening of applicants for both public housing and Housing Choice Vouchers. People with disabilities, and especially people with psychiatric disabilities, at times have contact with the criminal justice system that is causally related to their disability.²⁴⁴ Applicants who have been denied housing due to a disability related criminal offense are able to request a reasonable accommodation for their denial to be reviewed. If the family includes a person with a disability, the HACLA decision concerning termination or denial is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8. For individuals and families seeking assistance on a case by case basis, the HACLA will consider making exceptions from the requirements of this Chapter for people with disabilities in accordance with the provisions of the HACLA Manual of Policy and Procedures Part I, Chapter 125:1, Exhibit 125:IC dealing with Requests for Consideration of Mitigating Circumstances.

Source of income discrimination

Source of income discrimination contributes to disproportionate housing needs and segregation for people with disabilities in LA City and the broader region. Many Americans living with disabilities rely on federal

²⁴¹ Pacific Shores Properties, LLC v. City of Newport Beach, 730 F.3d 1142 (9th Cir. 2013).

²⁴² Douglas v. Independent Living Center of Southern California, 565 U.S. 606 (2012).

²⁴³ Armstrong v. Exceptional Child Center, Inc., 135 S. Ct. 1378 (2015).

²⁴⁴ As part of the 2018 Agency Plan process, HACLA is proposing to amend the criminal background screening for Section 8 admissions. If approved by HUD, prior drug-related and violent criminal activity will not be grounds for denial of admission.

or state assistance, including rental assistance, for their income. When landlords have the latitude to reject tenants with disabilities based on the source of their income, those who rely on governmental assistance become more constrained in their housing options, are barred from neighborhoods where their source of income is not recognized, and can have trouble accessing housing at all. In a competitive rental market like Los Angeles, the effects of this kind of discrimination are particularly acute. Although California does have a law that bans source of income discrimination, in 2010 in *Sabi v. Sterling*, the California Court of Appeal for the Second District interpreted the law to not cover discrimination against households using Section 8 or Housing Choice Vouchers. The rental listings on Craigslist sharply illustrate the impact of that decision; one search reveals more than 75 rental listings in Central LA that specifically note that Section 8 applicants are not welcome and about 300 ads of this kind in the county at-large.

In extreme circumstances, source of income discrimination can constrain the supply of housing that is available to voucher holders so much that voucher holders must pay more than 30% of their income for rent and experience housing cost burden. Because individuals who do not have disabilities are generally unable to get individual exceptions from payment standards, this is particularly likely to affect people with disabilities who are able to pay a higher percentage of their income in rent due to a reasonable accommodation from HACLA. Although it is critical that HACLA grant reasonable accommodations to allow voucher holders with disabilities the ability to rent units that require them to pay more than 30% of their income in rent, the resulting cost burden is not ideal.

Source of income discrimination also channels voucher holders to low-income communities of color. While the vast majority of census tracts in the City contain fewer than 50 households that rely on Section 8 Housing Choice Vouchers, census tracts with the highest concentrations of households receiving voucher assistance are located primarily in majority-minority areas. Also, between 2000 and 2013, the number of households in the City receiving assistance from both programs decreased overall, a decline that was almost universal in majority White areas. But, the few areas in which the number of households relying on federal assistance rose were mostly in majority-minority neighborhoods. The fact that the lowest income renters have become more concentrated in majority-minority neighborhoods is indicative of both increased segregation and R/ECAPs.

The California State Senate has a bill pending (SB 1053) that would protect tenants who rely on Section 8 vouchers, but it has not passed yet. Elsewhere in California, Santa Clara County has banned Section 8 discrimination in its unincorporated areas, Santa Monica has passed a law prohibiting the practice in City limits, and San Jose is considering a similar measure. However, LA City has no such protections in place today.

State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings

State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings are a significant contributing factor to the segregation of people with disabilities in LA. The primary state or local laws, policies, or practices that discourage people with disabilities from living in integrated settings are those that constrain the supply of affordable housing and fail to ensure that affordable units are accessible to people with disabilities. In LA, zoning and land use restrictions, a shortage of available subsidy, and California's Costa-Hawkins Rental Housing Act, among other factors, all limit the supply of affordable housing. The Costa-Hawkins Rental Housing Act preempts more aggressive rent control than is

currently in place and, until the recent passage of A.B. 1505, prevented the application of mandatory inclusionary zoning to rental units. People with disabilities who are exiting institutional settings tend to have low incomes and, frequently, extremely low incomes that necessitate affordable housing. Rent controlled units and inclusionary zoning units may not be affordable to individuals who are at risk of institutionalization at their listed rents but may be available within Fair Market Rent (FMR) limits for Housing Choice Vouchers. Although HCIDLA is now working to implement its Accessible Housing Program, past compliance with accessibility requirements in federally-funded affordable housing was systemically uneven.

E. Fair Housing Enforcement, Outreach Capacity and Resources

List and summarize any of the following that have not been resolved:

- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing;
- Pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

In February 2011, *qui tam* relators Mei Ling and the Fair Housing Council of San Fernando Valley filed a lawsuit against the City alleging that the City failed to comply with a myriad of federal accessibility requirements, including under Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, the Fair Housing Act, and their implementing regulations. See *United States of America ex. rel. Mei Ling, et al., v. City of Los Angeles, et al.*, Case No. 2:11-cv-00974 PSG (JCx). Among other things, Section 504 and its implementing regulations require that a percentage of units in federally funded housing projects must be accessible to persons with disabilities pursuant to federal construction guidelines, and that a municipality's housing programs be operated in a manner that is accessible to people with disabilities, including by having information readily available regarding accessible units and their availability, designing a program to address complaints, and by training staff to become experts in the accessibility requirements. The *qui tam* relators alleged the City failed to comply with these requirements, and that by failing to do so, the City also violated the federal False Claims Act by submitting HUD Consolidated Plan certifications to the federal government stating that the City was affirmatively furthering fair housing. After conducting an investigation for several years while the complaint remained under seal, on June 7, 2017, the United States Department of Justice (DOJ) gave notice that it was intervening in the lawsuit to step in and pursue these claims on behalf of the federal government. On July 31, 2017, DOJ filed an amended complaint further detailing the allegations first made in the 2011 complaint and adding state law claims against the City. The deadline for the City to answer the complaint or file a motion to dismiss has been extended to November 13, 2017.

During three visits in late 2011, HUD's Office of Fair Housing and Equal Opportunity ("FHEO") reviewed the City's compliance with the Americans with Disabilities Act and other federal accessibility laws as part

of FHEO's oversight of the City's receipt of federal funds from the US Department of Housing and Urban Development (HUD), which the City uses to fund housing developments. As a result of these visits, HUD issued findings against the City asserting that the City had not fully complied with federal accessibility laws with respect to its housing programs.

Although the City had been monitored by HUD at least annually since 1976, noncompliance with Section 504 had not been identified as a finding by HUD until the 2011 FHEO monitoring. At that time, the City believed that California Building Code provided greater accessibility than federal law (as stated on the State of California Division of State Architect's website). It strongly asserted that it did not submit Consolidated Plan certifications with an intent to defraud the government. After receiving the FHEO findings, the HCIDLA began to examine and update its policies and procedures to ensure compliance with Section 504 and the ADA Title II.

On January 13, 2012, the Independent Living Center of Southern California (ILCSC), Fair Housing Council of San Fernando Valley (FHCSFV), and Communities Actively Living Independent and Free (CALIF) filed a lawsuit against the City alleging that the City and the Community Redevelopment Agency of Los Angeles (CRA/LA) failed to ensure that housing developments funded, developed, or significantly assisted by the City and/or the CRA/LA had the required number of accessible units for people with mobility and hearing/vision disabilities and were made available to people with disabilities, and further failed to operate other aspects of the City's housing program in compliance with Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, the Fair Housing Act, and California state law. See *Independent Living Center of Southern California v. City of Los Angeles*, Case No. 2:12-cv-00551-SJO (PJW) (C.D. Cal.).

On August 30, 2016, the Los Angeles City Council agreed to settle litigation, and the settlement was approved by the court on or about September 5, 2016. The settlement provides that, over the next 10 years, the City will ensure that at least 4,000 of its affordable housing units in the HCIDLA portfolio be brought into compliance with architectural accessibility standards under Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, and California Government Code Section 11135.

To implement the Agreement, the City will:

- Ensure that all future construction of multi-family housing units overseen by the City fully comply with Section 504 of the Rehabilitation Act, the ADA, the federal Fair Housing Amendments Act, and the California Building Code 11B, and when those requirements conflict, comply with those requirements that provide the greatest accessibility;
- Ensure that non-discriminatory rental occupancy policies are adopted and implemented by owners and property management agents for covered housing developments;
- Redesign the City's rental housing website, www.housing.lacity.org, to provide an Accessible Housing Registry that lists all accessible units and their features and allows individuals with disabilities the opportunity to be notified of vacant units and apply for the units online or through a call center;
- Provide effective communications for applicants, tenants, and the public that includes large print and Braille documents, auxiliary aids and services, hearing devices, and other services to ensure that communications with applicants and tenants with disabilities are as effective as communications with people without disabilities;
- Train City staff, owners, and their property managers on federal and state laws relating to nondiscrimination in regard to people with disabilities;

- Train City HCIDLA, Department on Disability (DOD) and Los Angeles Department of Building and Safety (LADBS) staff on the interpretation and application of Accessibility Standards.
- Respond to concerns and resolve grievances by people with disabilities in a timely manner; and
- Provide detailed semi-annual reports to the Plaintiffs, the Court and City management regarding all of the activities undertaken to carry out these requirements.
- Spend at least \$200 million during the life of the Agreement to provide the required accessibility.

The Los Angeles Housing and Community Investment Department (HCIDLA) implements the requirements of the Settlement Agreement through its Accessible Housing Program (AcHP) Unit.

FHEO conducted additional site inspections in 2017, and the City and FHEO are in discussions over further measures that HUD may require the City to take, above and beyond those included in the *Independent Living* Settlement Agreement noted below, in order to fully resolve HUD's findings against the City. HUD has notified the City that future funding under HUD programs may be at risk if the City does not agree to certain ongoing requirements that go above and beyond the *Independent Living* settlement requirements.

Describe any state or local fair housing laws. What characteristics are protected under each law?

California Laws

The State Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The Fair Employment and Housing Act (FEHA) (Government Code Section 12955 et seq.) prohibits discrimination and harassment in housing practices, including:

- Advertising
- Application and selection process
- Unlawful evictions
- Terms and conditions of tenancy
- Privileges of occupancy
- Mortgage loans and insurance
- Public and private land use practices (zoning)
- Unlawful restrictive covenants

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex, including Gender, Gender Identity, and Gender Expression
- Marital status
- Source of income
- Sexual orientation
- Familial status (households with children under 18 years of age)
- Religion
- Mental/physical disability
- Medical condition
- Age
- Genetic information

In addition, FEHA contains similar reasonable accommodations, reasonable modifications, and accessibility provisions as the Federal Fair Housing Amendments Act. FEHA explicitly provides that violations can be proven through evidence of the unjustified disparate impact of challenged actions and inactions and establishes the burden shifting framework that courts and the Department of Fair Employment and Housing must use in evaluating disparate impact claims.

The Unruh Civil Rights Act provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists “sex, race, color, religion, ancestry, national origin, disability, and medical condition” as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics. In practice, this has meant that the law protects against arbitrary discrimination, including discrimination on the basis of personal appearance.

Furthermore, the Ralph Civil Rights Act (California Civil Code Section 51.7) forbids acts of violence or threats of violence because of a person’s race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute. Hate violence can include: verbal or written threats; physical assault or attempted assault; and graffiti, vandalism, or property damage.

The Bane Civil Rights Act (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual’s constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act may not be imposed for speech alone unless that speech itself threatened violence.

And, finally, California Civil Code Section 1940.3 prohibits landlords from questioning potential residents about their immigration or citizenship status. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person’s citizenship or immigration status.

In addition to these acts, Government Code Sections 11135, 65008, and 65580-65589.8 prohibit discrimination in programs funded by the State and in any land use decisions. Specifically, recent changes to Sections 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including:

- Housing for persons with disabilities (SB 520)
- Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing (SB 2)
- Housing for extremely low income households, including single-room occupancy units (AB 2634)
- Housing for persons with developmental disabilities (SB 812)

Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Housing Rights Center (HRC)

The Housing Rights Center (HRC) is under contract with HCIDLA to provide fair housing services throughout in the City.

HRC is a nonprofit agency whose mission is to actively support and promote fair housing through education and advocacy. HRC provides the following fair housing related services to all Los Angeles residents, regardless of income:

- Appointment free counseling on fair housing rights and responsibility through their physical offices, workshops and clinics held throughout the City and their toll-free fair housing hotline 1-800-477-5977.
- Maintains a website with fair housing information, housing listings, resources, and FAQs (www.housingrightscenter.org).
- Investigates allegations of housing discrimination under the fair housing laws. The Investigations Department conducts fact finding investigations and proposes potential solutions for victims of housing discrimination. Case resolution can include mediation, conciliation, a referral to State and federal administrative agencies, or referral to HRC's Litigation Department.
- Provides telephone and in-person counseling to both tenants and landlords regarding their respective rights and responsibilities under California law and local City ordinances.
- Hosts an Annual Housing Rights Summit, which brings interested parties together to discuss fair housing and raises public awareness of fair housing issues and services.
- Offers a monthly Fair Housing Certification Training for housing industry professionals who are interested in learning about the federal and State fair housing laws. HRC presently offers trainings in English, Spanish, and Korean.²⁴⁵
- Develops and distributes educational literature and resources that describe ways to prevent housing injustices and the applicable laws that protect against discrimination. The materials are made available free to the public in several different languages including English, Spanish, Korean, Mandarin, Armenian, Cantonese, and Russian.²⁴⁶
- Presents free fair housing law workshops for landlords, tenants, nonprofit organizations and City employees. Depending on the audience, the presentations can be translated by staff into Armenian, Mandarin, Spanish, or Russian.²⁴⁷

Education and Outreach Efforts

The HRC presents fair housing workshops and programs to audiences including residential property personnel (e.g., landlords, property managers, and real estate agents), tenants, prospective homebuyers, code enforcement personnel, police officers, City employees, and other non-profit organizations. HRC distributes education literature and resources in English, Spanish, Korean, Mandarin, Armenian, Cantonese and Russian.²⁴⁸ The Fair Housing Certification Training for housing industry professionals is available in English, Spanish, and Korean.²⁴⁹

²⁴⁵ <http://www.hrc-la.org/doc.asp?id=15&parentid=7>, accessed August 09, 2017

²⁴⁶ Id

²⁴⁷ Id

²⁴⁸ www.housingrightscenter.org/doc/asp?id/32, accessed August 09, 2017

²⁴⁹ www.housingrightscenter.org/doc/asp?id=15&parentid=7, accessed August 09, 2017

HRC sponsors the Housing Rights Summit, a day-long conference held annually since 2000 which brings interested parties together and raises public awareness of fair housing issues and services. The event attracts civil rights advocates, social service providers, housing industry and community members, and government entities to address fair housing and other related issues, such as housing accessibility for persons with disabilities and how housing conditions affects resident health.

In response to a lawsuit filed by HRC against LA City and LA County that local homeless shelters were not accepting service animals, the City and the Los Angeles Homeless Services Authority (LAHSA) worked with HRC to develop training workshops and policies for homeless service providers on this and other fair housing topics.

Additional outreach and education is needed, including to the following groups:

- **Small rental property owners:** Owners of smaller rental properties tend to be less educated about fair housing requirements than larger corporate property owners. For some, the first time they are made aware of fair housing requirements is when they are accused of violating a law by a tenant. Currently, the Apartment Association of Greater Los Angeles (AAGLA) offers a 2-day Property Management Training Program that is open to anyone who would like to become familiar with the local rules and regulations. The AAGLA created this training for property owners that have been cited by HCIDLA's Rent Stabilization Program to educate owners and their managers on how to legally maintain their rent-controlled property. The topics that are covered (Property Management Training):
 - Property Code Compliance
 - Rent Stabilization Ordinance
 - Lead Hazard Remediation
 - How to avoid Illegal Nuisance
 - Fair Housing
 - Landlord/Tenant Law
- **Property Managers:** The high turnover rate among property managers contributes to the constant need for new property managers to be trained on fair housing requirements.
- **Police Officers:** Police Officers are often called to the scene of landlord-tenant or tenant-tenant disputes. The officers would benefit from fair housing training. In the past, fair housing organizations have distributed fair housing guides to officers during roll call. This outreach, however, ceased due to funding constraints.

Telephone and In-person Counseling

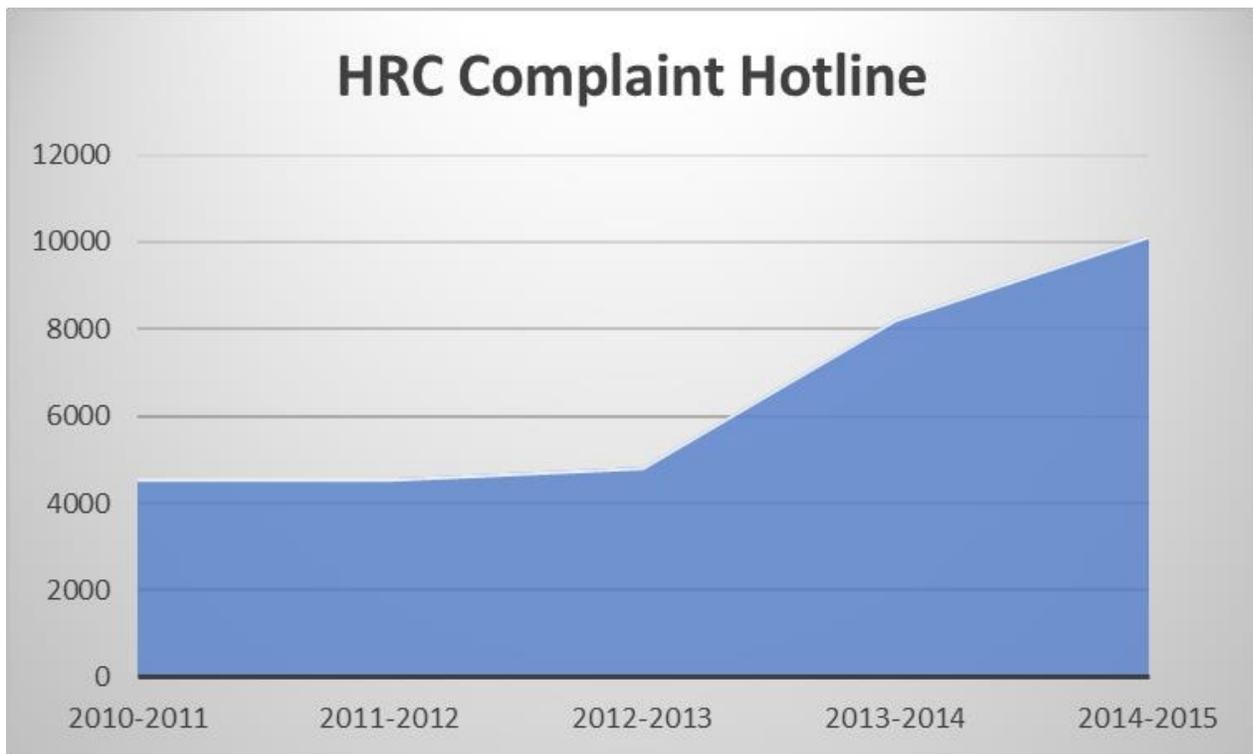
HRC also provides free telephone and in-person counseling to both tenants and landlords regarding their rights and responsibilities under federal law, California law, and local city ordinances. Housing counselors are trained in landlord/tenant law and are able to inform clients of a wide-range of actions they can take to enforce their rights.²⁵⁰

In PY 13-14, HRC had 8,248 contacts from LA households which included individuals and families. HRC opened 409 cases and gathered sufficient evidence to sustain allegations in 222 cases (54%). The majority of cases involved allegations of mental or physical disability. In PY 14-15, HRC provided services to 21,961 individuals (10,110 households). HRC received 1,036 discrimination complaints of which 431 warranted

²⁵⁰ www.housingrightscenter.org/doc.asp?id=16, accessed August 09, 2017

further investigation to remedy possible legal disputes. Sufficient evidence was gathered to sustain allegations in 247 cases (60%). In PY 15-16, HRC provided services to 1,053 callers of which 380 discrimination cases were opened. Of the 380 cases HRC opened, sufficient evidence was gathered to sustain the allegations in 172 cases (45%). The City continued partnering with the HRC to investigate complaints placed through the HRC hotline. In PY 15-16, the majority of intakes conducted by HRC calls were of persons with physical or mental disabilities.

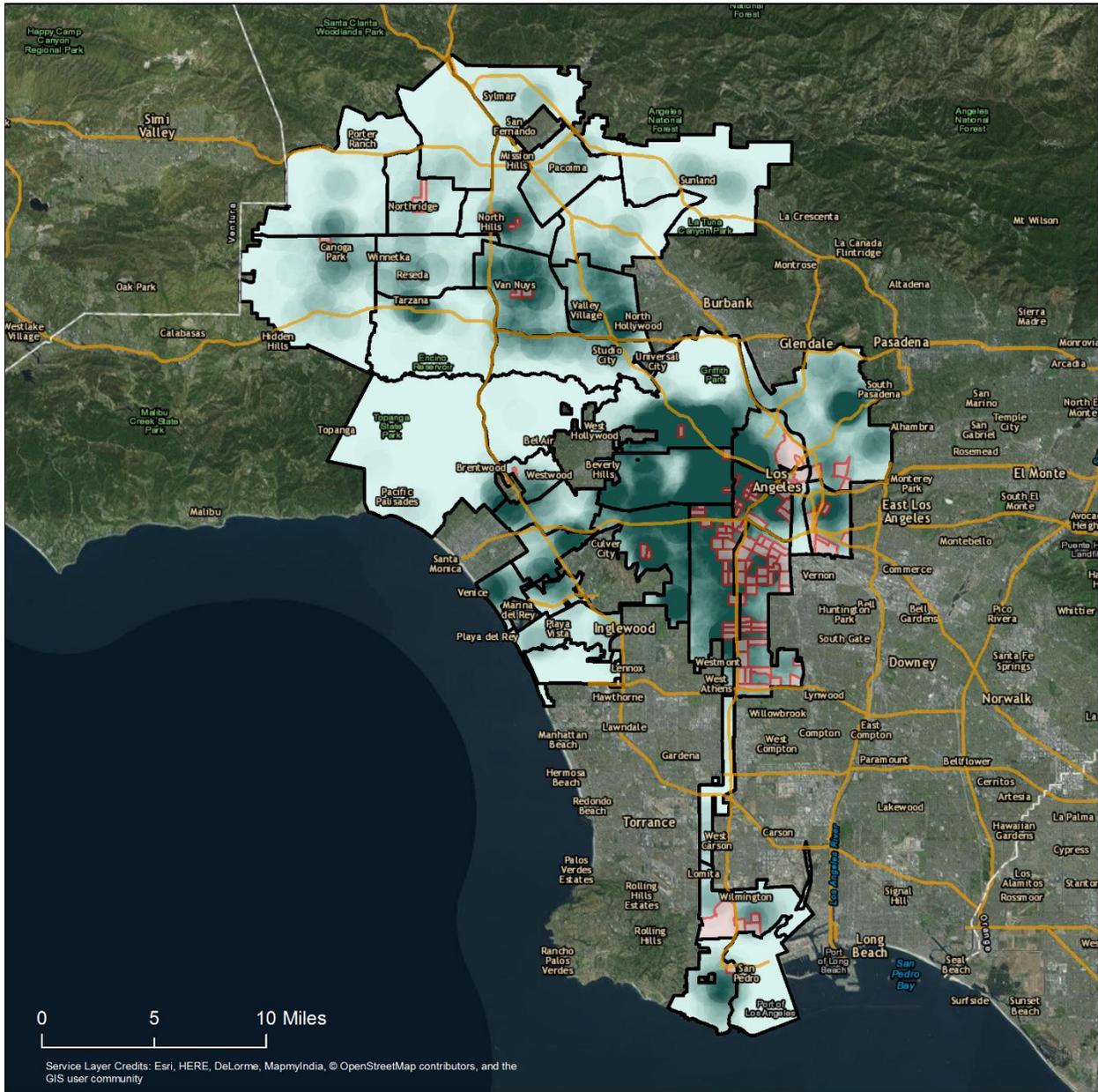
The chart below demonstrates that over the 5-year period from Fiscal Year (FY) 2010-2011 to FY 2014-2015, calls fielded by HRC's Complaint Hotline have consistently increased from a low of 4,574 in FY 2011 to a high of 10,152 in FY 2015.



The Heatmap below demonstrates the distribution and density of the 10,152 complaints across the City for PY 2014-2015. The greatest concentration of complaints exist in Central and Downtown LA from Hollywood as the northwest boundary to Elysian Valley on the east edge down to Vermont Vista in the south and over to Miracle Mile to the west. In the Valley, there are hotspots in North Hills, Van Nuys, Valley Village, and North Hollywood. There are additional hotspots in Northeast LA and Mount Washington. Near the Port of LA, there is an additional hotspot in San Pedro. In the Westside of LA, there are additional hotspots in Venice and Sawtelle.

Map 1

City of L.A. AFH: Housing Rights Center Complaint Data



Complaint Density

- High
- Low

Community Planning Area

Freeways

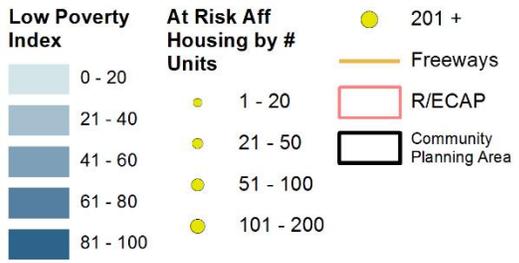
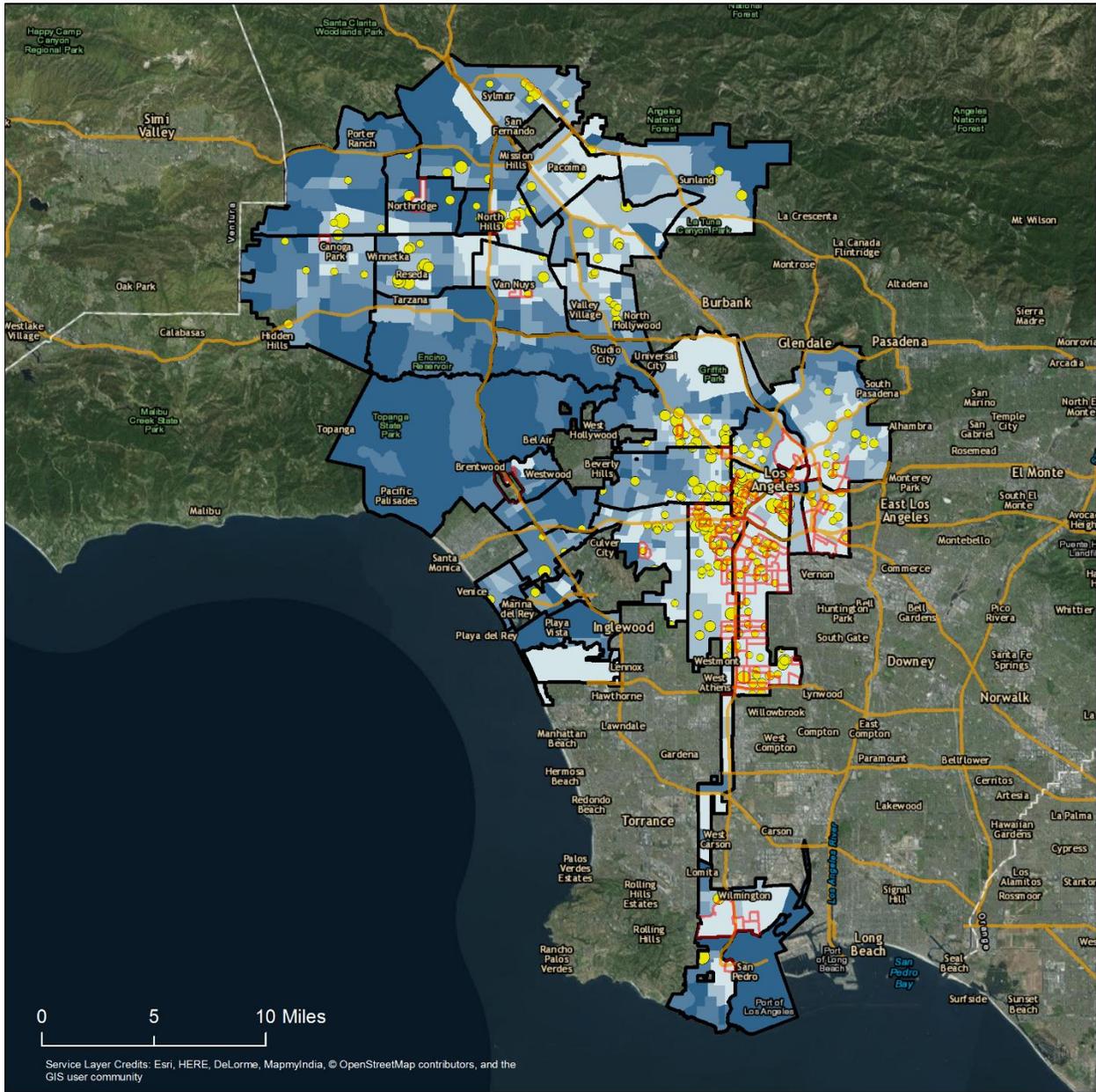
R/ECAP

The first map below illustrates the distribution of subsidized housing units at risk of converting to market rate rentals within the next five years due to expiring affordability restrictions over the Low Poverty Index which illustrates the distribution of those living in poverty. There is significant overlap between the neighborhoods with high exposure to poverty and the density of HRC complaints with the highest concentrations of units at risk of conversion from subsidized rentals to market rate rentals especially in the central part of the City. The second map below illustrates the concentration of households with housing cost burden, households paying more than 30% of their income towards rent, in the central part of the City. The overlap of high density of complaints, high exposure to poverty, subsidized units at risk of converting to market rate, and households with housing cost burden may be predictive of future neighborhood change that is particularly likely to result in the disproportionate displacement of residents of protected classes in the absence of the expansion of the Rent Stabilization Ordinance, preservation of affordable rental units at risk of conversion, and rental assistance programs to ease the rent burden.²⁵¹

²⁵¹ <https://communityinnovation.berkeley.edu/reports/Gentrification-Report.pdf>, accessed August 27, 2017

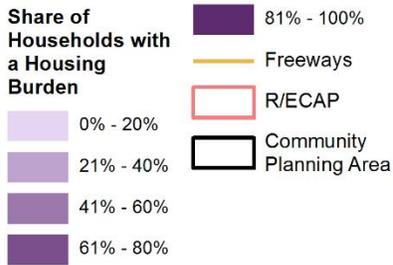
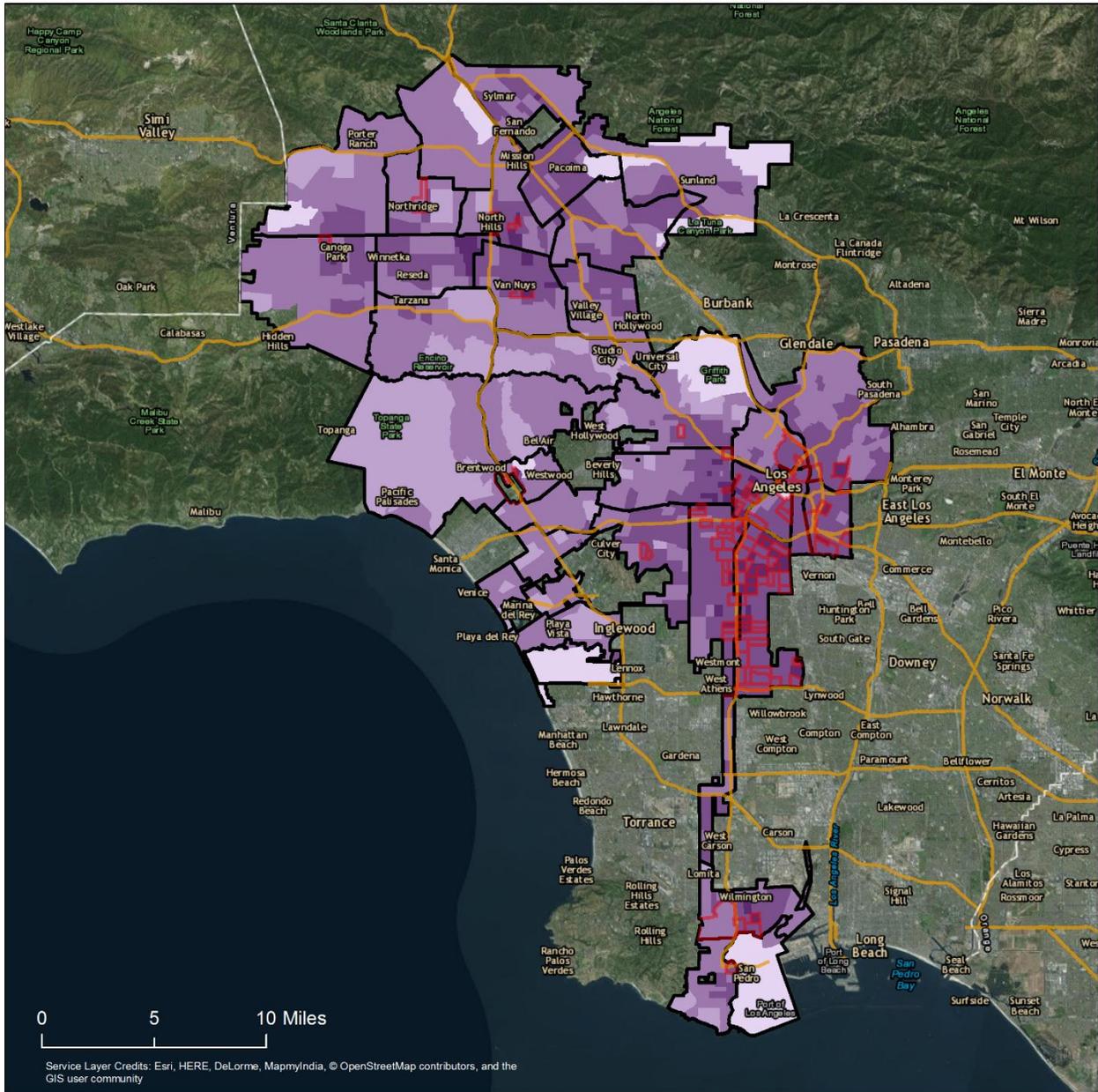
Map 2

City of Los Angeles: At Risk Affordable Housing Units with Low Poverty Index



Map 3

City of Los Angeles: Share of Households with a Housing Burden



City of Los Angeles Housing + Community Investment Department (HCIDLA)

HCIDLA provides several types of training that cover fair housing:

- HCIDLA’s Occupancy Monitoring Unit offers training to property managers of new developments financed or otherwise assisted by HCIDLA. This training which includes information about determining incomes and rents as well as fair housing, etc. Currently, the training is not required but property managers of newly constructed or rehabilitated developments are strongly encouraged to attend.
- HCIDLA’s Accessible Housing Program (AcHP) *requires* property owners and management staff of the approximately 730 developments on the Settlement Agreement’s “Covered Housing” list to adopt and implement the City’s model occupancy policies, Fair Housing Policies in Regard to Disability. The AcHP has developed a one-day training course on fair housing related to disability and the City’s model policies. This training has been conducted for the John Stewart Company’s and Thomas Safran & Associates’ property management unit. Training sessions are scheduled throughout the fall and winter of 2017 for approximately 2,000-3,000 property management staff. Fair housing training in regard to disability will be conducted annually.
- The AcHP Policy Unit will also conduct onsite monitoring at least annually of each of the approximately 730 Covered Housing developments to ensure that each is implementing the Policies. On a quarterly basis the The AcHP will work with owners and property managers to enforce the policies. If the owner refuses to abide by the Policies, the project will be forwarded to the City Attorney.
- HCIDLA has created an Accessible Housing component on its website that contains information about Covered Housing developments, policies, and the grievance process.

Independent Living Centers

Independent living centers are nonprofit, community-based organizations that provide a range of vital services for people with any type of disability. These organizations are dedicated to empowering people with disabilities to live independently in their communities. In order to accomplish this broad mission, they offer a broad array of services including peer counseling, job placement and counseling, housing assistance, transportation, information and referrals, benefits assistance, and a wide range of classes. In addition to these essential practical services, the Centers also advocate for people with disabilities to have greater input on policies. Together Communities Actively Living Independent and Free (CALIF), Disability Community Resource Center (DCRC, formerly Westside Center for Independent Living), and the Independent Living Center of Southern California (ILCSC) serve the communities of Los Angeles. As nonprofits, they are dependent on grants, contracts, and individual contributions. Despite their limited budgets, independent living centers provide indispensable services to people with disabilities.

Additional Information

Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

California Department of Fair Employment and Housing (DFEH)

DFEH accepts, investigates, conciliates, mediates, and prosecutes complaints under FEHA, the Disabled Persons Act, the Unruh Civil Rights Act, and the Ralph Civil Rights Act. DFEH investigates complaints of employment and housing discrimination based on race, sex, including gender, gender identity, and gender

expression, religious creed, color, national origin, familiar status, medical condition (cured cancer only), ancestry, physical or mental disability, marital status, or age (over 40 only), and sexual orientation, DFEH established a program in May 2003 for mediating housing discrimination complaints, which is among the largest fair housing mediation program in the nation to be developed under HUD's Partnership Initiative with state fair housing enforcement agencies. The program provides California's tenants, landlords, and property owners and managers with a means of resolving housing discrimination cases in a fair, confidential, and cost-effective manner. Key features of the program are: 1) it is free of charge to the parties; and 2) mediation takes place within the first 30 days of the filing of the complaint, often avoiding the financial and emotional costs associated with a full DFEH investigation and potential litigation.

The City's fair housing service provider, HRC, works in partnership with HUD and DFEH. When HRC receives a complaint of housing discrimination, staff investigates the complaint. Once the investigation is completed, the complainant is advised of the alternatives available in proceeding with complaints, which include: mediation/conciliation, referral to HRC's legal division, administrative filing with HUD or DFEH, referral for consideration to the Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, or referral to a private attorney for possible litigation.

Los Angeles Police Department (LAPD)

In 2016, LAPD adopted the Hate Crime Supplemental Report, Form 03.01.05, to document investigations of hate crimes or hatred incident investigations. LAPD developed the Hate Crime Supplemental Report in partnership with the City of LA Human Relations Commission's Transgender Working Group (TWG), the Mayor's Office, and with advocates and representatives of the transgender, gender non-conforming and non-binary persons' community.

LAPD defines a hate crime as "any criminal act or attempted criminal act directed against a person(s), public agency or private institution based on the victim's actual or perceived race, nationality, religion, sexual orientation, disability, gender or because the agency or institution is identified or associated with a person or group of an identifiable race, nationality, religion, sexual orientation, disability or gender. A hate crime includes an act which results in injury, however slight; a verbal threat of violence which apparently can be carried out; an act which results in property damage; and, property damage or other criminal act(s) directed against a public or private agency."²⁵² Further, LAPD defines a hatred incident as any "non-criminal act including words directed against a person(s) based on that person's actual or perceived race, nationality, religion, sexual orientation, disability or gender. Hatred incidents include, but are not limited to, epithets, distribution of hate material in public places, posting of hate material that does not result in property damage, and the display of offensive material on one's own property."²⁵³

LAPD's updated Hate Crime/Incident Guidelines detail the responsibilities for all Department employees who become aware of a crime or incident motivated by hatred or prejudice. Additionally, the policy includes specific responsibilities for Investigating Field Units, Watch Commanders, Records Unit, Area Hate Crime Coordinators, Investigating Detectives, Area Commanding Officers, Bureau Commanding Officers and Police Sciences and Training Bureau.²⁵⁴

²⁵² LAPD Department Manual Volume IV, Revised by Special Order No. 12, 2016, 203.25 Reporting Incidents Motivated by Hatred or Prejudice

²⁵³ jd

²⁵⁴ jd

According to Assistant Chief Beatrice Girmala, hate crimes against the transgender, gender non-conforming, and non-binary persons' community are both the most prevalent hate crimes committed in Los Angeles and also the fastest rising target of reported hate crimes.²⁵⁵ From January 1, 2017 through June 30, 2017, there has been a 900% increase in reported hate crimes against members of the transgender, gender non-conforming and non-binary persons' community over the same period in 2016.²⁵⁶

- a. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

Affirmative Marketing

For publicly funded projects with five or more units, an affirmative marketing strategy must be completed and submitted to HCIDLA by developers at least 90 days before initially advertising the units for rent and before tenants can be selected to occupy any restricted units.

The Affirmative Marketing Actions must indicate the actions taken to outreach/advertise to those least likely to apply, non-English speaking communities, and persons with disabilities. For each advertised action listed, developers must keep evidence of their outreach efforts.

HCIDLA's required Property Management Plan (PMP) must be filled out and signed by the owner or the designated property manager. The PMP lists the accessible mobility and hearing/vision units with unit numbers. The PMP specifies required Affirmative Marketing Actions:

1. Indicate the actions taken to outreach/advertise to those least likely to apply, non-English speaking communities, and persons with disabilities. For each advertised action you list below, you must keep evidence of outreach efforts:
 - a. Provide a legible printed screen shot of your property listing(s) on these and any website on which you post as a part of the "Post Lease-Up Verification of Outreach" submission (next page). Publication of affordable unit vacancies was posted on: <http://housing.lacity.org/>. Click on "Add a rental property" to register your company and your property. Fill out accessibility information about units that comply with ADA 2010 and/or Section 504/UFAS. Date first Posted: //
 - b. B. Advertising materials: Include Equal Housing Opportunity logo AND Universal Symbol of Accessibility on advertising. Include the following statements on all advertising:
 - "This housing is offered without regard to race, color, national origin, sex, religion, ancestry, genetic information, source of income, age, marital status, familial status, sexual orientation or preference, gender identity, or disability, or any other basis prohibited by law."
 - "A person with a disability may request a reasonable accommodation (a reasonable change in policies), a reasonable structural modification, an accessible unit or the provision of auxiliary aids and services, in order to have equal access to a housing program. If you or anyone in your household has a disability, and because of that disability requires a specific accommodation, modification or auxiliary aids or

²⁵⁵ LAPD Assistant Chief Beatrice Girmala. Telephone interview. September 12, 2017.

²⁵⁶ LAPD Hate Crimes Report, 6/1/2017 TO 6/30/2017, accessed September 13, 2017.

services to fully use our housing services, please contact our staff for a reasonable accommodation form.”

- c. The populations least likely to apply are:
- d. Identify specific outreach to:
 - Those least likely to apply-fill out “Verification of Outreach Conducted” form on next page
 - i. Persons with disabilities – fill out “Target Audience” on the “Verification of Outreach Conducted” form on next page. See attached Resource Guide.
 - ii. Non-English speakers – fill out in “Target Audience” on the “Verification of Outreach Conducted” form on next page.

The PMP also contains a Resource Guide of Agencies Serving Persons With Disabilities so that property managers have no excuse about where to begin their outreach efforts. The Policy Unit of the AcHP will review all affirmative marketing efforts and materials during their onsite visit.

City of Los Angeles and Los Angeles Metropolitan Statistical Area Home Mortgage Disclosure Act Analysis

Fair lending, access to credit, and access to financial opportunity are important components of any Assessment of Fair Housing (AFH). The ability to access credit and capital on fair and equal terms is a bedrock principle underlying several federal and state civil rights laws including: the Fair Housing Act of 1968, as amended; the Equal Credit Opportunity Act (ECOA); the Community Reinvestment Act (CRA); the Home Mortgage Disclosure Act (HMDA); and the Wall Street Reform and Consumer Protection Act (Dodd/Frank).

The inability to access credit due to discrimination often contributes to disparities in access to opportunity and disproportionate housing needs. It may also demonstrate a need for greater civil rights and fair housing compliance. When lending disparities afflicting members of protected classes are extreme or redlining is present, those disparities can contribute to segregation and racially and/or ethnically concentrated areas of poverty (R/ECAPs).

The data collected under the Home Mortgage Disclosure Act (HMDA) are used to help determine whether lending institutions are serving the mortgage lending and housing needs of their communities; help public officials target public investment to attract private investment where it is needed; and to assist in identifying possible discriminatory lending patterns and enforcing anti-discrimination statutes.

The most effective way to assess whether mortgage lenders may have systemically treated similarly situated non-minority borrowers more favorably than minority borrowers is to analyze the HMDA data for lending disparities. This analysis focuses on the HMDA data for the City of Los Angeles (LA) and the region.

This report analyzes 2016 HMDA data and includes the following:

- Tables showing origination and denial rates by race and ethnicity for both the City and the region by type of loan (purchase, refinance, home improvement). Race/ethnicity categories will be for Race, Not Hispanic or Latino and then for Hispanic or Latino.
- Tables showing the percentage of originated loans that are high cost by race and ethnicity for both the City and the region by the type of loan.

- Heat maps showing both percentages and total volume by community planning area by loan type for:
 - a. Number of originated mortgages
 - b. % of originations
 - c. % of denials
 - d. Number of high cost loans
 - e. % of loans that are high cost
- Denial and origination rates for income bands (<50%, 50%-80%, 80%-120%, >120%)

Figure 4 City of LA Loan Originations and Denials by Race and Ethnicity and Type of Loan

Loan originated (Numbers)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	2,014	11,279	25,268	38,561
Black or African American	270	778	2,545	3,593
Asian	291	2,886	5,039	8,216
American Indian or Alaska Native	11	39	107	157
Native Hawaiian or Other Pacific Islander	30	148	373	551
Not applicable	38	254	707	999
Total	2,654	15,384	34,039	52,077
Hispanic or Latino				
Total	826	4,183	9,732	14,741
Not applicable				
Total	899	4,090	8,677	13,666
Grand Total	4,379	23,657	52,448	80,484
Loan Denied (Numbers)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	719	1,799	8,328	10,846
Black or African American	222	192	1,583	1,997
Asian	140	494	1,889	2,523
American Indian or Alaska Native	7	7	97	111
Native Hawaiian or Other Pacific Islander	12	35	205	252
Not applicable	28	63	534	625
Total	1,128	2,590	12,636	16,354
Hispanic or Latino				
Total	573	787	4,545	5,905
Not applicable				
Total	380	542	3,114	4,036
Grand Total	2,081	3,919	20,295	26,295
Source:				
Enterprise tabulation of the 2016 HMDA data, accessed from CFPB				

When compared to the overall demographics of the City of Los Angeles, Hispanics represent 47.7% of the City's population²⁵⁷ but only represent 18.3% of all loan originations (18.9% of home improvement loans originated, 17.6% of home purchase originations and 18.5% of refinance loans). Blacks are another group that is underrepresented with respect to loan originations. Blacks are 8.8% of the City's population yet account for only 4.4% of all loan originations. Asians and Whites are 11.3% and 27.8% of the City's population and represent 10.2% and 47.9% of loan originations, respectively.

²⁵⁷ U.S. Census Bureau, https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml?src=bkmk, accessed October 05, 2017

Figure 5 LA MSA Loan Originations and Denials by Race and Ethnicity and Type of Loan

Loan originated (Numbers)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	5,064	25,983	63,292	94,339
Black or African American	718	2,681	7,581	10,980
Asian	1,246	11,364	19,892	32,502
American Indian or Alaska Native	49	126	344	519
Native Hawaiian or Other Pacific Islander	100	436	1,235	1,771
Not applicable	121	638	1,964	2,723
Not Hispanic or Latino Total	7,298	41,228	94,308	142,834
Hispanic or Latino				
Total	3,065	16,842	35,557	55,464
Not applicable				
Total	2,136	9,625	23,401	35,162
Grand Total	12,499	67,695	153,266	233,460
Loan Denied (Numbers)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	1,712	3,605	20,278	25,595
Black or African American	528	613	4,816	5,957
Asian	496	1,662	6,472	8,630
American Indian or Alaska Native	38	24	312	374
Native Hawaiian or Other Pacific Islander	44	79	626	749
Not applicable	53	133	1,381	1,567
Not Hispanic or Latino Total	2,871	6,116	33,885	42,872
Hispanic or Latino				
Total	1,815	2,859	16,126	20,800
Not applicable				
Total	1,025	1,297	8,711	11,033
Grand Total	5,711	10,272	58,722	74,705

Source:

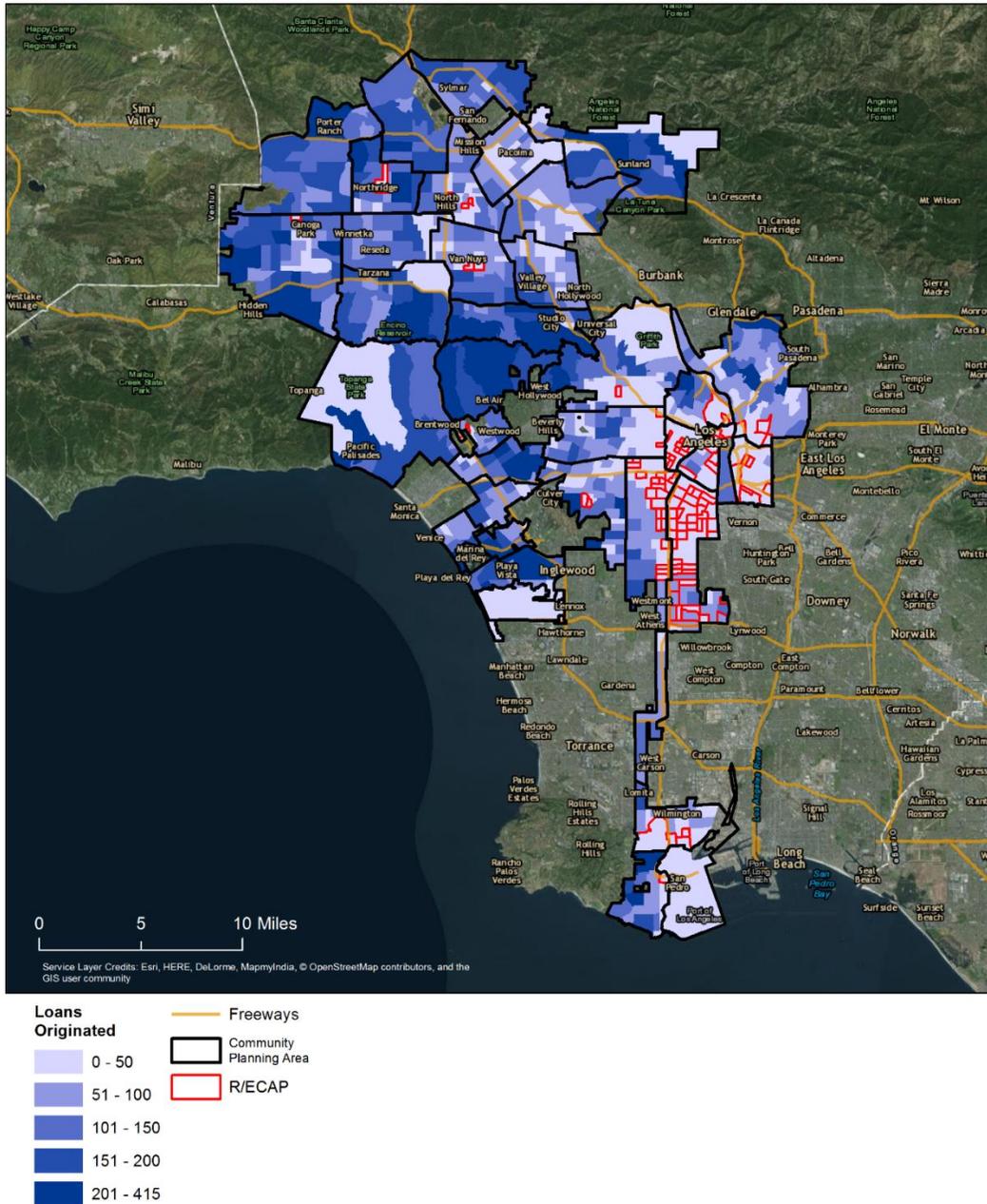
[Enterprise tabulation of the 2016 HMDA data, accessed from CFPB](#)

Similar patterns persist at the regional level though disparities in origination volume by race and ethnicity are somewhat less pronounced than in the city. When compared to the overall demographics of the region, Hispanics represent 47.7% of the region's population²⁵⁸ but only represent 23.8% of all loan originations (24.9% of the home improvement loans originated, 24.9% of home purchase originations and 23.2% of the refinancing loans). Blacks represent another group that are underrepresented in loan originations. Blacks are 6.5% of the City's population yet represent only 4.7% of all loan originations. Asians and Whites are 15.1% and 30.6% of the City's population and represent 13.9% and 40.4% of loan originations, respectively.

²⁵⁸ U.S. Census Bureau, https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml?src=bkmk, accessed October 05, 2017

Map 6

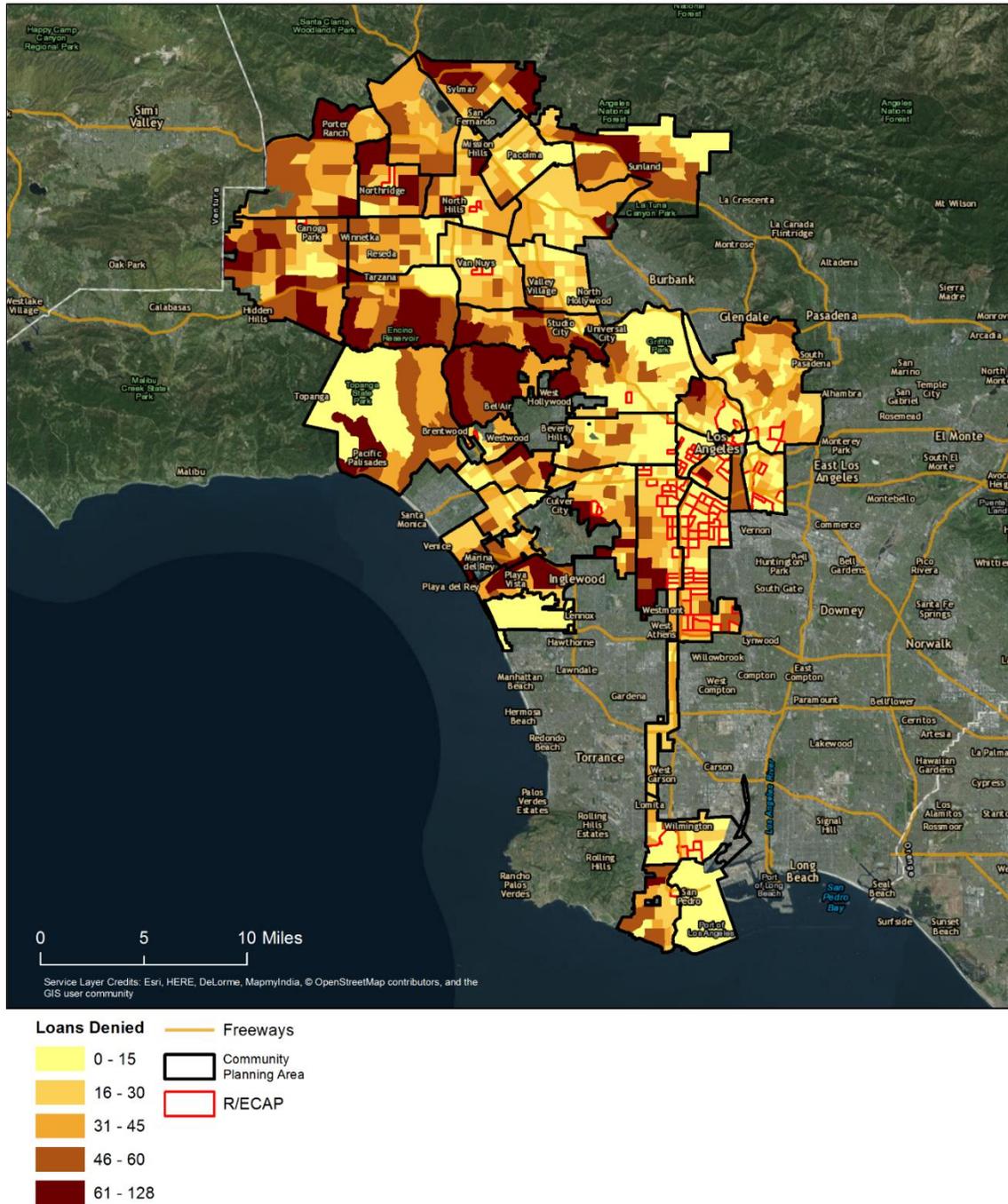
City of L.A. AFH: Number of Loan Originations by Census Tract, 2016



The map above shows the volume of loan origination activity in the City of Los Angeles by census tract with boundaries overlaid for community planning areas. The map is broadly consistent with the data showing disparities in loan origination activity by race and ethnicity. Predominantly non-Hispanic White areas in West LA, the southern and western portions of the San Fernando Valley, and western San Pedro have the highest loan origination volume along with more diverse pockets in Northeast LA and Downtown LA, as well as predominantly Black areas within western South LA. Heavily minority areas such as eastern South LA, East LA, and parts of Central LA west of Downtown including the Westlake District and Pico-Union have low numbers of loan originations.

Map 7

City of L.A. AFH: Number of Loans that were Denied by Census Tract, 2016



The map above shows the number of denied loan applications by census tract with community planning area boundaries delineated. This map largely mirrors the previous map showing originated loans. This does not mean that the areas with the highest numbers of denied applications are those with the greatest barriers to credit. Instead, denial rates, which are discussed below, are more instructive.

Figure 8 City of LA Loan Originations and Denials (Rates) by Race and Ethnicity and Type of Loan

Loan originated (Rates)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	74%	86%	75%	78%
Black or African American	55%	80%	62%	64%
Asian	68%	85%	73%	77%
American Indian or Alaska Native	61%	85%	52%	59%
Native Hawaiian or Other Pacific Islander	71%	81%	65%	69%
Not applicable	58%	80%	57%	62%
Total	70%	86%	73%	76%
Hispanic or Latino				
Total	59%	84%	68%	71%
Not applicable				
Total	70%	88%	74%	77%
Grand Total	68%	86%	72%	75%
Loan Denied (Rates)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	26%	14%	25%	22%
Black or African American	45%	20%	38%	36%
Asian	32%	15%	27%	23%
American Indian or Alaska Native	39%	15%	48%	41%
Native Hawaiian or Other Pacific Islander	29%	19%	35%	31%
Not applicable	42%	20%	43%	38%
Total	30%	14%	27%	24%
Hispanic or Latino				
Total	41%	16%	32%	29%
Not applicable				
Total	30%	12%	26%	23%
Grand Total	32%	14%	28%	25%

Source:

[Enterprise tabulation of the 2016 HMDA data, accessed from CFPB](#)

The table above shows that, across all loan types, White applicants have the highest origination rates and the lowest denial rates. In general, Asian applicants have the next highest level of access to credit across categories although Pacific Islanders fare as well in a few categories. Black applicants have the lowest origination rates and highest denial rates across categories, and Hispanic applicants have the next least access to credit. The rates reflected in the table above do not control for important factors such as borrower income and loan amount.

Figure 9 LA MSA Originations and Denials (Rates) by Race and Ethnicity and Type of Loan

Loan originated (Rates)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	75%	88%	76%	79%
Black or African American	58%	81%	61%	65%
Asian	72%	87%	75%	79%
American Indian or Alaska Native	56%	84%	52%	58%
Native Hawaiian or Other Pacific Islander	69%	85%	66%	70%
Not applicable	70%	83%	59%	63%
Total	72%	87%	74%	77%
Hispanic or Latino				
Total	63%	85%	69%	73%
Not applicable				
Total	68%	88%	73%	76%
Grand Total	69%	87%	72%	76%
Loan Denied (Rates)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	25%	12%	24%	21%
Black or African American	42%	19%	39%	35%
Asian	28%	13%	25%	21%
American Indian or Alaska Native	44%	16%	48%	42%
Native Hawaiian or Other Pacific Islander	31%	15%	34%	30%
Not applicable	30%	17%	41%	37%
Not Hispanic or Latino Total	28%	13%	26%	23%
Hispanic or Latino				
Total	37%	15%	31%	27%
Not applicable				
Total	32%	12%	27%	24%
Grand Total	31%	13%	28%	24%

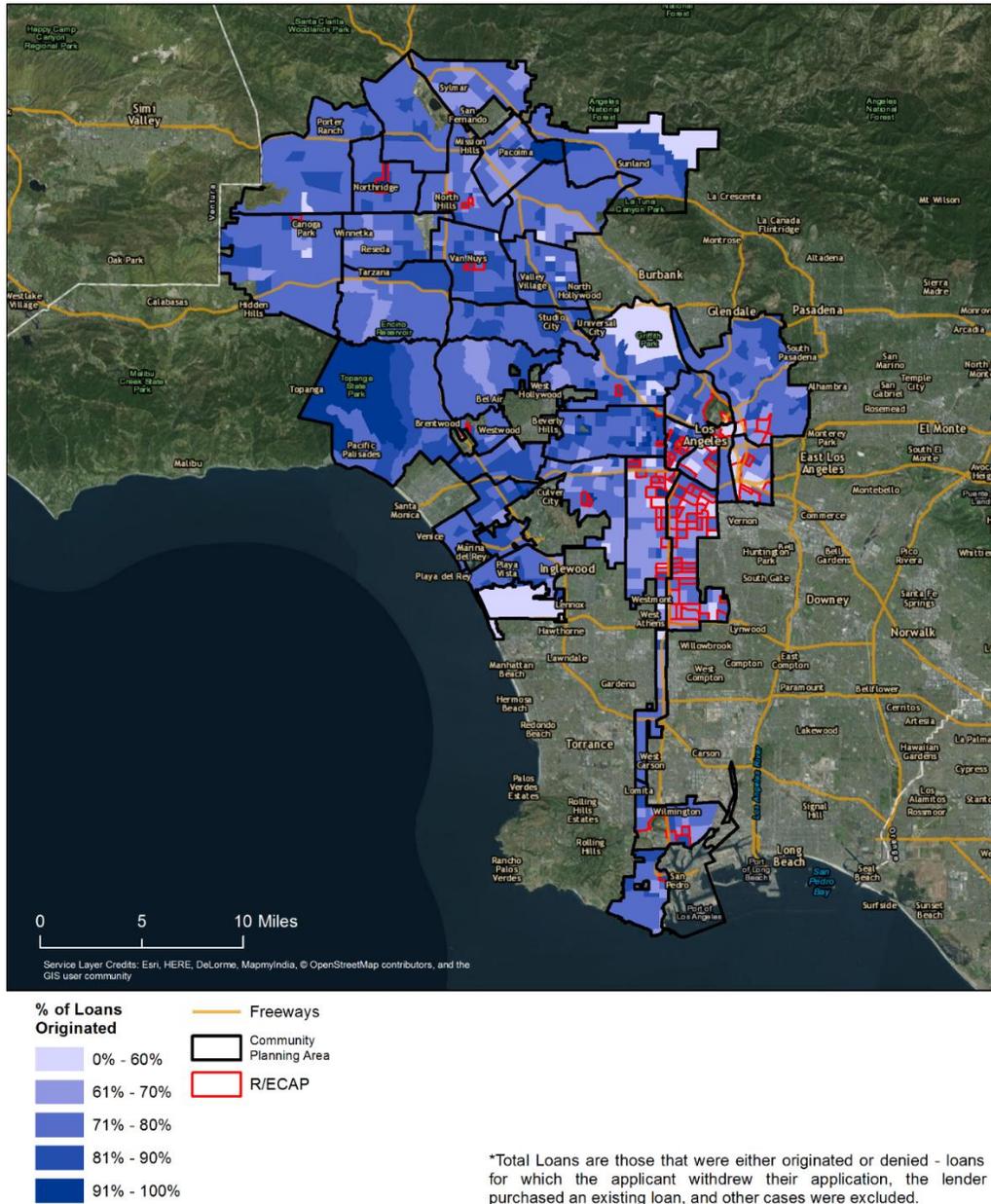
Source:

[Enterprise tabulation of the 2016 HMDA data, accessed from CFPB](#)

The table above confirms that the same patterns for origination and denial rates in LA City persist in the region. Across all groups, there tend to be higher origination rates and lower denial rates in the region than in the city. Additionally, the gap between White and Asian applicants is smaller in the region than it is in the city. That is consistent with the differences in socioeconomic conditions facing residents of heavily Asian communities within the city, such as Koreatown, Chinatown, and Historic Filipinotown, and heavily Asian communities in Orange County and the San Gabriel Valley.

Map 10

City of L.A. AFH: Percent of Total Loans that were Originated by Census Tract, 2016

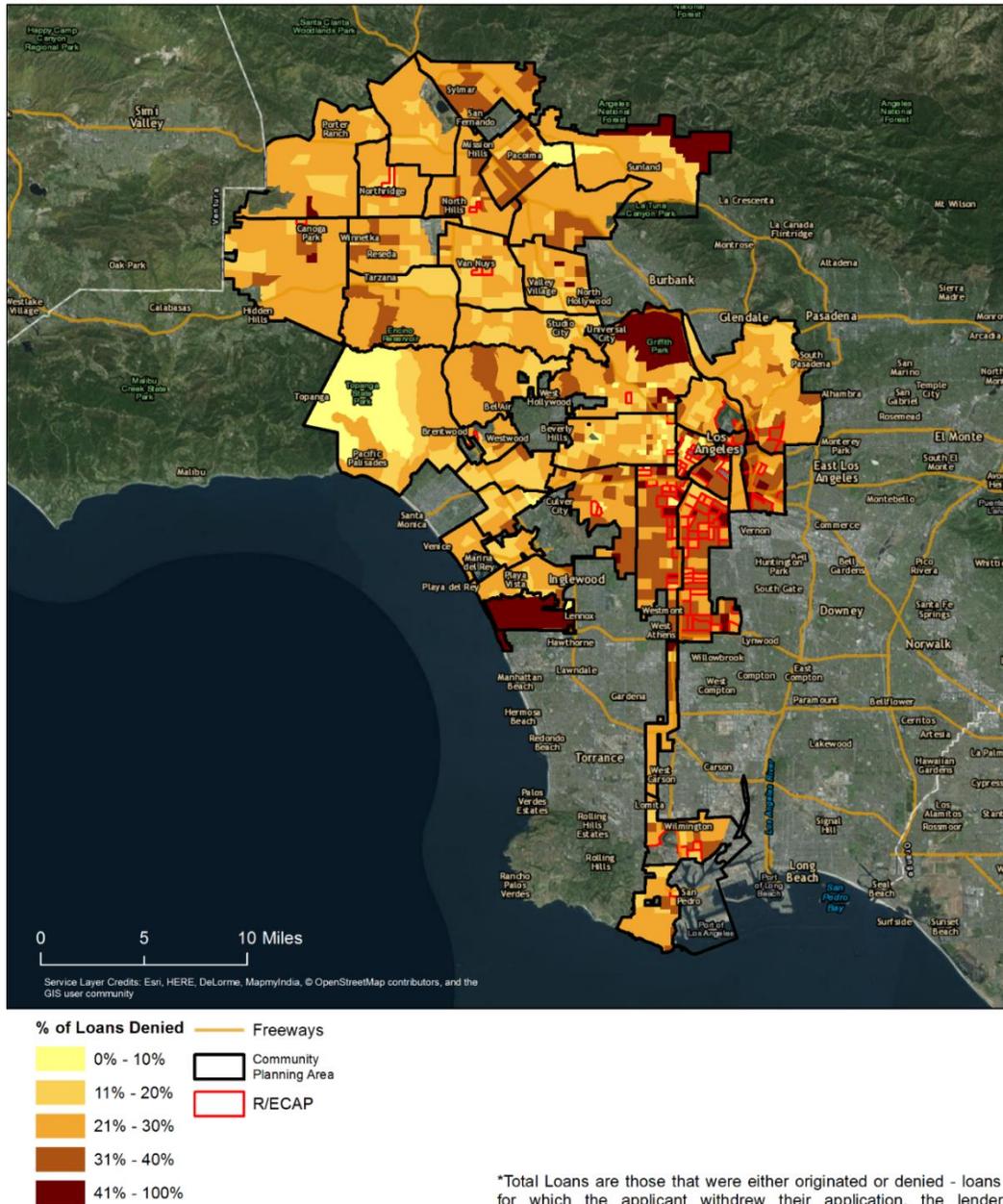


The map above depicts loan origination rates by census tract with community planning area boundaries delineated. Origination rates are highest in West LA, the southern and western portions of the Valley, and areas to the west of Downtown LA. These areas include some of the most heavily White parts of the City but also more diverse areas such the Westlake District and Koreatown. The map does not indicate the race or ethnicity of successful loan applicants by census tract. It is possible that homebuyers whose race largely varies from that of longtime neighborhood residents are securing loans for new owner-occupied housing that is out of reach for longtime residents. Thus, high origination rates in communities of color that are

largely renter-occupied but that have new owner-occupied housing coming online may be an indicator of gentrification.

Map 11

City of L.A. AFH: Percent of Total Loans that were Denied by Census Tract, 2016



The map above depicts loan application denial rates by census tract with community planning area boundaries delineated. The areas with the highest denial rates are in South LA, East LA, and the northeastern Valley, all areas that are predominantly Black and/or Hispanic. Consistent with the previous map, predominantly Hispanic and Asian Central LA neighborhoods that are undergoing gentrification have low denial rates.

Figure 12 City of LA Loan Originations and Denials by Race and Ethnicity and Income (Area Median Income)

Loan originated	< than 50% MSA Median	50-80% MSA Median	80-120% MSA Median	> than 120% MSA Median	No Income Data	Grand Total
Not Hispanic or Latino						
White	412	915	3,310	32,591	1,333	38,561
Black or African American	93	247	726	2,128	399	3,593
Asian	86	237	873	6,686	334	8,216
American Indian or Alaska Native	1	9	22	110	15	157
Native Hawaiian or Other Pacific Islander	4	22	69	418	38	551
Not applicable	10	33	91	794	71	999
Not Hispanic or Latino Total	606	1,463	5,091	42,727	2,190	52,077
Hispanic or Latino						
Hispanic or Latino Total	391	1,418	3,600	8,200	1,132	14,741
Not applicable						
Not applicable Total	120	282	1,005	7,828	4,431	13,666
Grand Total	1,117	3,163	9,696	58,755	7,753	80,484
Loan denied (Numbers)	< than 50% MSA Median	50-80% MSA Median	80-120% MSA Median	> than 120% MSA Median	No Income Data	Grand Total
Not Hispanic or Latino						
White	689	774	1,431	7,554	398	10,846
Black or African American	208	290	478	918	103	1,997
Asian	134	196	405	1,667	121	2,523
American Indian or Alaska Native	13	17	21	52	8	111
Native Hawaiian or Other Pacific Islander	17	18	30	172	15	252
Not applicable	63	61	91	393	17	625
Not Hispanic or Latino Total	1,124	1,356	2,456	10,756	662	16,354
Hispanic or Latino						
Hispanic or Latino Total	563	935	1,578	2,506	323	5,905
Not applicable						
Not applicable Total	267	336	632	2,419	382	4,036
Grand Total	1,954	2,627	4,666	15,681	1,367	26,295
Source:						
Enterprise tabulation of the 2016 HMDA data, accessed from CFPB						

For all originations that occurred for applicants making less than 50% of the AMI, Whites experienced the highest percentage of originations at 36.8% even though they comprise only 27.8% of the population. Hispanics make up 47.7% of the population but only 35% of the originations. Originations that occurred for applicants making between 50-80% of the AMI were almost identically proportional to the City's overall Racial and Ethnic percentages. For originations that occurred for applicants between 80-120% of the AMI, Whites received 34.3% of those originations while Hispanics were at 37%. For those applicants making over 120% of the AMI, Whites received over 55% of the originations, Hispanics received just 13.9% and Blacks received less than 4% of those loans even though they make up 8.8% of the City's population. The proportion of loans received by Blacks decreased with each ascending income band, beginning with 8.3% of originations among applicants with incomes of less than 50% of the AMI and declining to 3.6% of originations to households with incomes of over 120% of the AMI.

Figure 13 City of LA Loan Originations and Denials (Rates) by Race and Ethnicity and Income (Area Median Income)

Loan originated	< than 50% MSA Median	50-80% MSA Median	80-120% MSA Median	> than 120% MSA Median	No Income Data	Grand Total
Not Hispanic or Latino						
White	37%	54%	70%	81%	77%	78%
Black or African American	31%	46%	60%	70%	79%	64%
Asian	39%	55%	68%	80%	73%	77%
American Indian or Alaska Native	7%	35%	51%	68%	65%	59%
Native Hawaiian or Other Pacific Islander	19%	55%	70%	71%	72%	69%
Not applicable	14%	35%	50%	67%	81%	62%
Not Hispanic or Latino Total	35%	52%	67%	80%	77%	76%
Hispanic or Latino						
Hispanic or Latino Total	41%	60%	70%	77%	78%	71%
Not applicable						
Not applicable Total	31%	46%	61%	76%	92%	77%
Grand Total	36%	55%	68%	79%	85%	75%
Loan denied (Numbers)	< than 50% MSA Median	50-80% MSA Median	80-120% MSA Median	> than 120% MSA Median	No Income Data	Grand Total
Not Hispanic or Latino						
White	63%	46%	30%	19%	23%	22%
Black or African American	69%	54%	40%	30%	21%	36%
Asian	61%	45%	32%	20%	27%	23%
American Indian or Alaska Native	93%	65%	49%	32%	35%	41%
Native Hawaiian or Other Pacific Islander	81%	45%	30%	29%	28%	31%
Not applicable	86%	65%	50%	33%	19%	38%
Not Hispanic or Latino Total	65%	48%	33%	20%	23%	24%
Hispanic or Latino						
Hispanic or Latino Total	59%	40%	30%	23%	22%	29%
Not applicable						
Not applicable Total	69%	54%	39%	24%	8%	23%
Grand Total	64%	45%	32%	21%	15%	25%
Source:						
Enterprise tabulation of the 2016 HMDA data, accessed from CFPB						

The table above shows the rates of Loan Origination and Denial Rates by Race/Ethnicity for the City of LA. Across all income bands, American Indian or Alaska Native experienced the highest denial rates though, as seen on the previous page and consistent with the data shown in the Demographic Summary, the total number of applications from American Indians and Alaska Natives was small, as is their share of the overall population. Among groups that comprise a significant share of the population, Blacks had the lowest origination rates and highest denial rates across income categories. Hispanics experienced the lowest denial rate for those below 50% of the AMI, 50-80% of the AMI, and, those between 80-120% of the AMI. Whites experienced the lowest denial rates for those above 120% of the AMI. Although this data could be interpreted as showing that Blacks continue to face barriers to credit as their income increases while application success rates for Hispanics are largely explained by income, it appears more likely that structural barriers to applying for loans decrease the volume of applications from Hispanics,

particularly among borrowers with lower incomes and more marginal credit history. Such barriers might include requirements that applicants provide their Social Security Number, which would limit access to credit for undocumented persons who are disproportionately Hispanic.

Figure 14 LA MSA Loan Originations and Denials by Race and Ethnicity and Income (Area Median Income)

Loan originated (Numbers)	< than 50% MSA Median	50-80% MSA Median	80-120% MSA Median	> than 120% MSA Median	No Income Data	Grand Total
Not Hispanic or Latino						
White	1,152	2,944	9,431	76,546	4,266	94,339
Black or African American	239	760	2,122	6,531	1,328	10,980
Asian	340	1,276	4,262	25,269	1,355	32,502
American Indian or Alaska Native	7	30	85	346	51	519
Native Hawaiian or Other Pacific Islander	13	71	236	1,313	138	1,771
Not applicable	26	98	269	2,111	219	2,723
Not Hispanic or Latino Total	1,777	5,179	16,405	112,116	7,357	142,834
Hispanic or Latino						
Hispanic or Latino Total	1,390	5,222	13,528	30,783	4,541	55,464
Not applicable						
Not applicable Total	366	1,070	3,350	21,592	8,784	35,162
Grand Total	3,533	11,471	33,283	164,491	20,682	233,460
Loan denied (Numbers)	< than 50% MSA Median	50-80% MSA Median	80-120% MSA Median	> than 120% MSA Median	No Income Data	Grand Total
Not Hispanic or Latino						
White	1,704	2,021	3,748	17,059	1,063	25,595
Black or African American	556	821	1,394	2,834	352	5,957
Asian	505	746	1,481	5,533	365	8,630
American Indian or Alaska Native	51	51	81	169	22	374
Native Hawaiian or Other Pacific Islander	54	78	132	451	34	749
Not applicable	153	151	261	940	62	1,567
Not Hispanic or Latino Total	3,023	3,868	7,097	26,986	1,898	42,872
Hispanic or Latino						
Hispanic or Latino Total	1,982	3,216	5,541	8,942	1,119	20,800
Not applicable						
Not applicable Total	721	1,031	1,892	6,388	1,001	11,033
Grand Total	5,726	8,115	14,530	42,316	4,018	74,705
Source:						
Enterprise tabulation of the 2016 HMDA data, accessed from CFPB						

Trends in origination and denial volume at the regional level largely mirrored those at the City level. Whites and Asians made up increasing portions of both originations and denials as income increased while Blacks and Hispanics comprised decreasing portions.

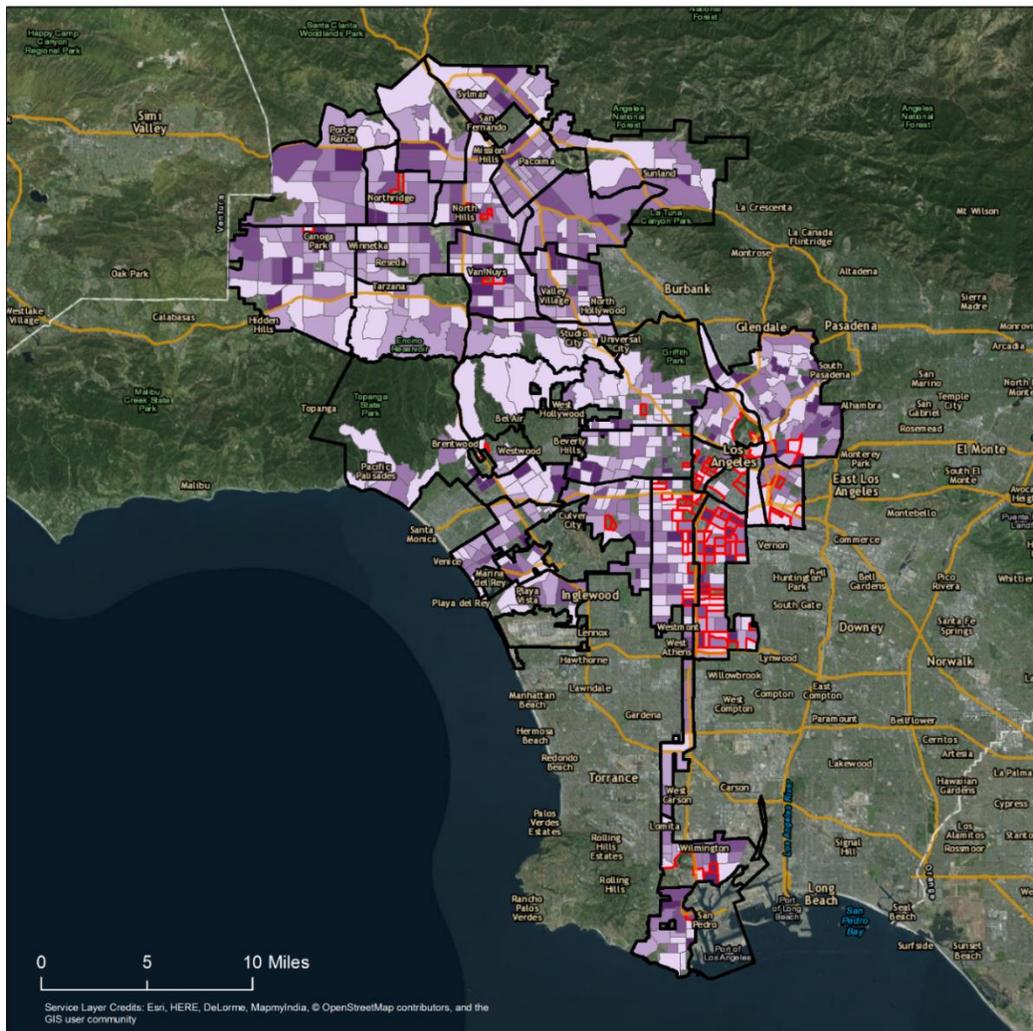
Figure 15 LA MSA Loan Originations and Denials (Rates) by Race and Ethnicity and Income (Area Median Income)

Loan originated (Rates)	< than 50% MSA Median	50-80% MSA Median	80-120% MSA Median	>than 120% MSA Median	No Income Data	Grand Total
Not Hispanic or Latino						
White	40%	59%	72%	82%	80%	79%
Black or African American	30%	48%	60%	70%	79%	65%
Asian	40%	63%	74%	82%	79%	79%
American Indian or Alaska Native	12%	37%	51%	67%	70%	58%
Native Hawaiian or Other Pacific Islander	19%	48%	64%	74%	80%	70%
Not applicable	15%	39%	51%	69%	78%	63%
Not Hispanic or Latino Total	37%	57%	70%	81%	79%	77%
Hispanic or Latino						
Hispanic or Latino Total	41%	62%	71%	77%	80%	73%
Not applicable						
Not applicable Total	34%	51%	64%	77%	90%	76%
Grand Total	38%	59%	70%	80%	84%	76%
Loan denied (Rates)	< than 50% MSA Median	50-80% MSA Median	80-120% MSA Median	> than 120% MSA Median	No Income Data	Grand Total
Not Hispanic or Latino						
White	60%	41%	28%	18%	20%	21%
Black or African American	70%	52%	40%	30%	21%	35%
Asian	60%	37%	26%	18%	21%	21%
American Indian or Alaska Native	88%	63%	49%	33%	30%	42%
Native Hawaiian or Other Pacific Islander	81%	52%	36%	26%	20%	30%
Not applicable	85%	61%	49%	31%	22%	37%
Not Hispanic or Latino Total	63%	43%	30%	19%	21%	23%
Hispanic or Latino						
Hispanic or Latino Total	59%	38%	29%	23%	20%	27%
Not applicable						
Not applicable Total	66%	49%	36%	23%	10%	24%
Grand Total	62%	41%	30%	20%	16%	24%

As at the City level, in the region, Blacks had disproportionately low origination rates and disproportionately high denial rates across income bands. For Hispanics, origination rates were only low and denial rates were only high at the highest income band. Whites and Asians continued to exhibit the highest levels of access to credit.

Map 16

City of L.A. AFH: Percent of Loans Originated for Buyers At or Below 50% of Area Median Income by Census Tract, 2016

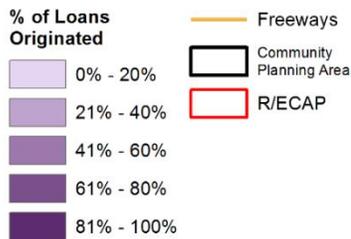
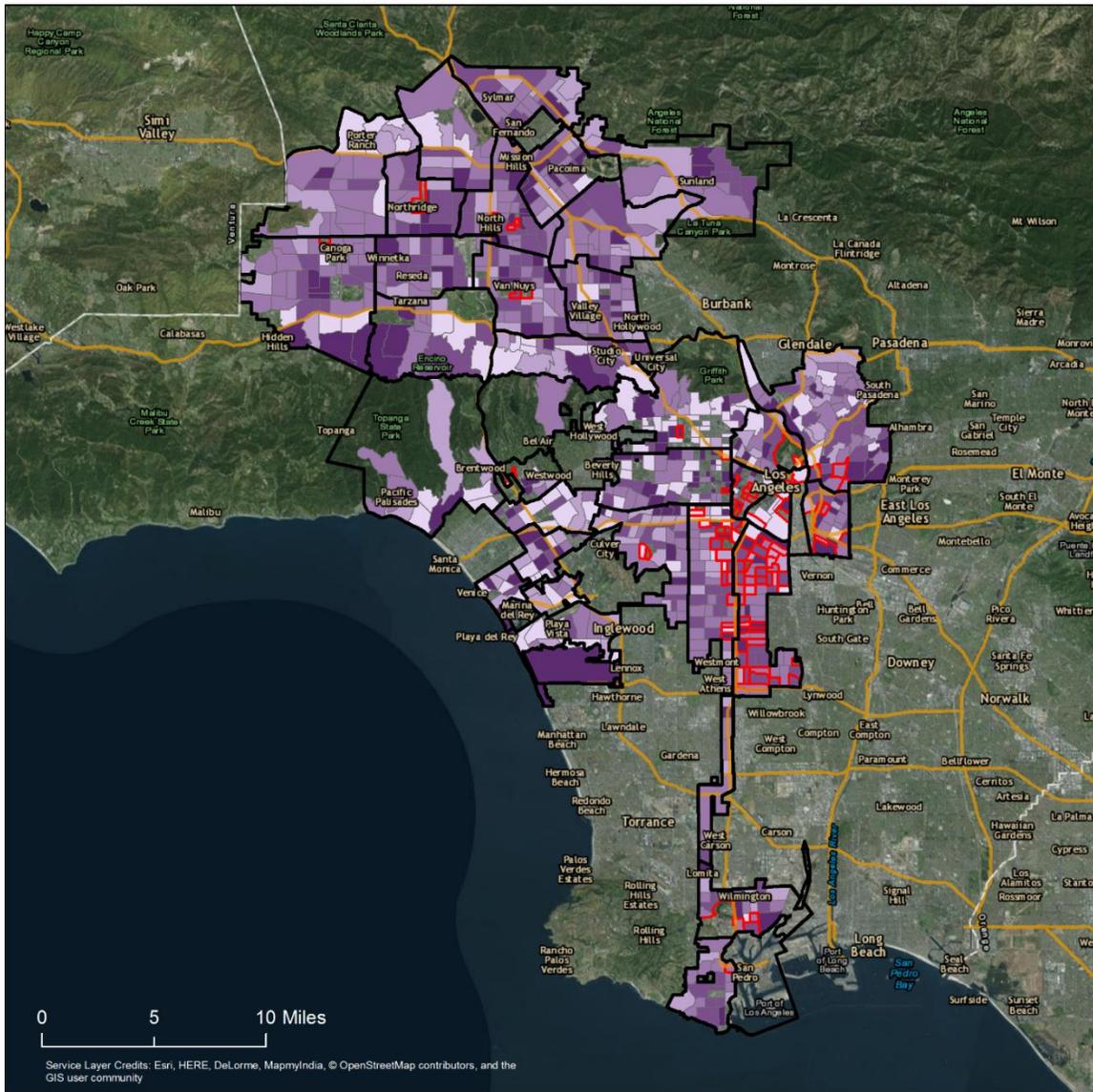


*Total Loans are those that were either originated or denied - loans for which the applicant withdrew their application, the lender purchased an existing loan, and other cases were excluded.

The map above shows the origination rate for applicants with incomes below 50% of AMI by census tract. Predominantly minority South LA and East LA had low origination rates, as did some heavily White and gentrifying areas in West LA and Central LA. The latter phenomenon was likely due to extremely small sample sizes in light of the high cost of housing in those areas. In some tracts, no data was reported because presumably no individuals or households with incomes below 50% of AMI applied for loans. The highest origination rates were in central portions of the San Fernando Valley that are relatively integrated among White, Hispanic, and Asian households but that have small Black populations.

Map 17

City of L.A. AFH: Percent of Loans Originated for Buyers Between 50% and 80% of Area Median Income by Census Tract, 2016



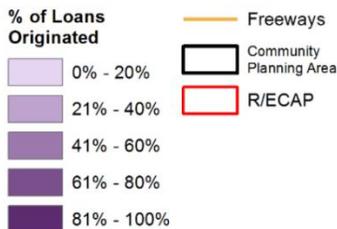
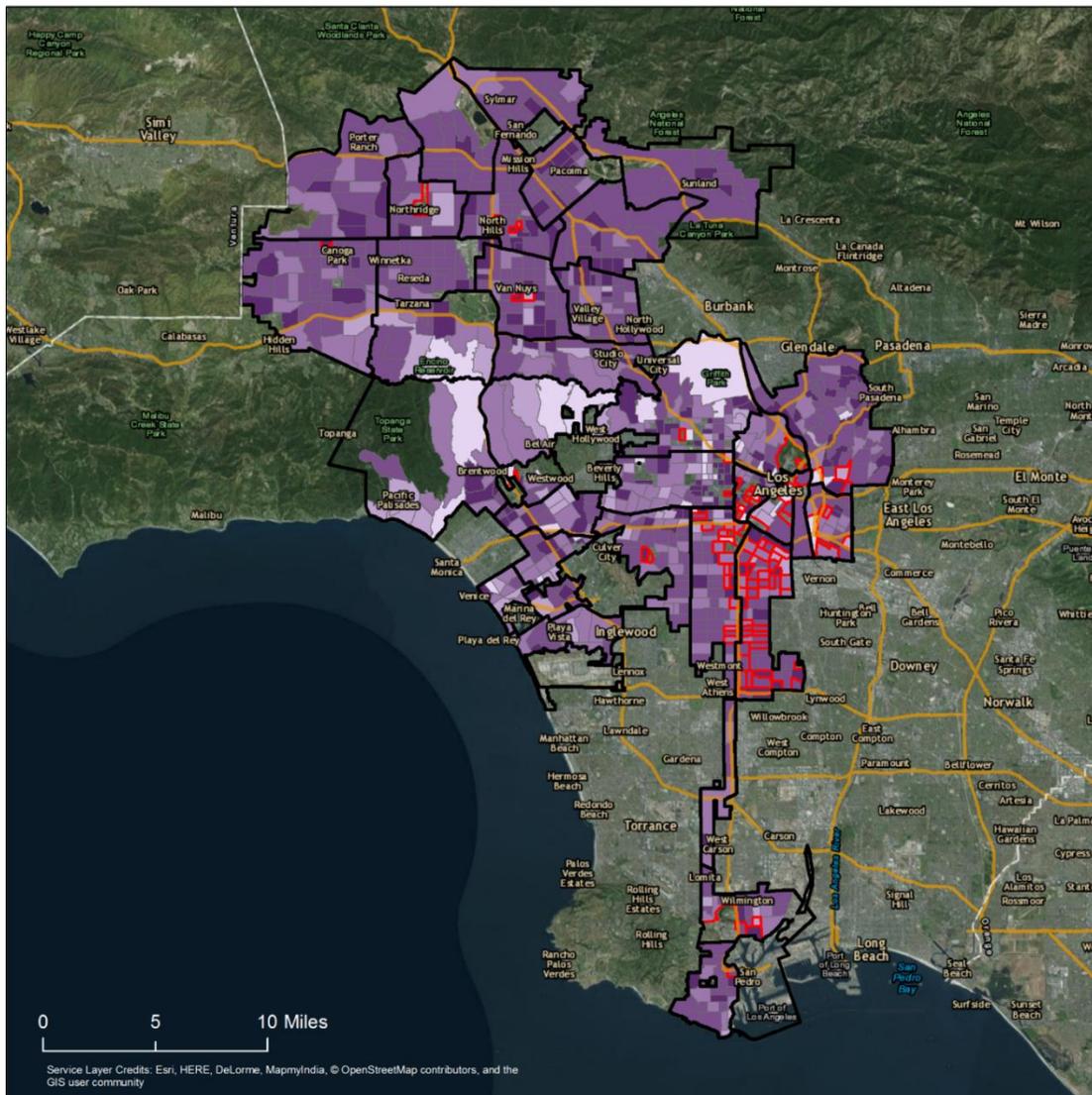
*Total Loans are those that were either originated or denied - loans for which the applicant withdrew their application, the lender purchased an existing loan, and other cases were excluded.

The map above shows origination rates for applicants with incomes of 50% to 80% of AMI. There are some slight distinctions from the previous map as origination rates in East and South LA were not disproportionately low. West and Central LA, with their high housing costs, continued to be areas with low

origination rates. Central portions of the San Fernando Valley continued to have relatively high origination rates.

Map 18

City of L.A. AFH: Percent of Loans Originated for Buyers Between 80% and 120% of Area Median Income by Census Tract, 2016

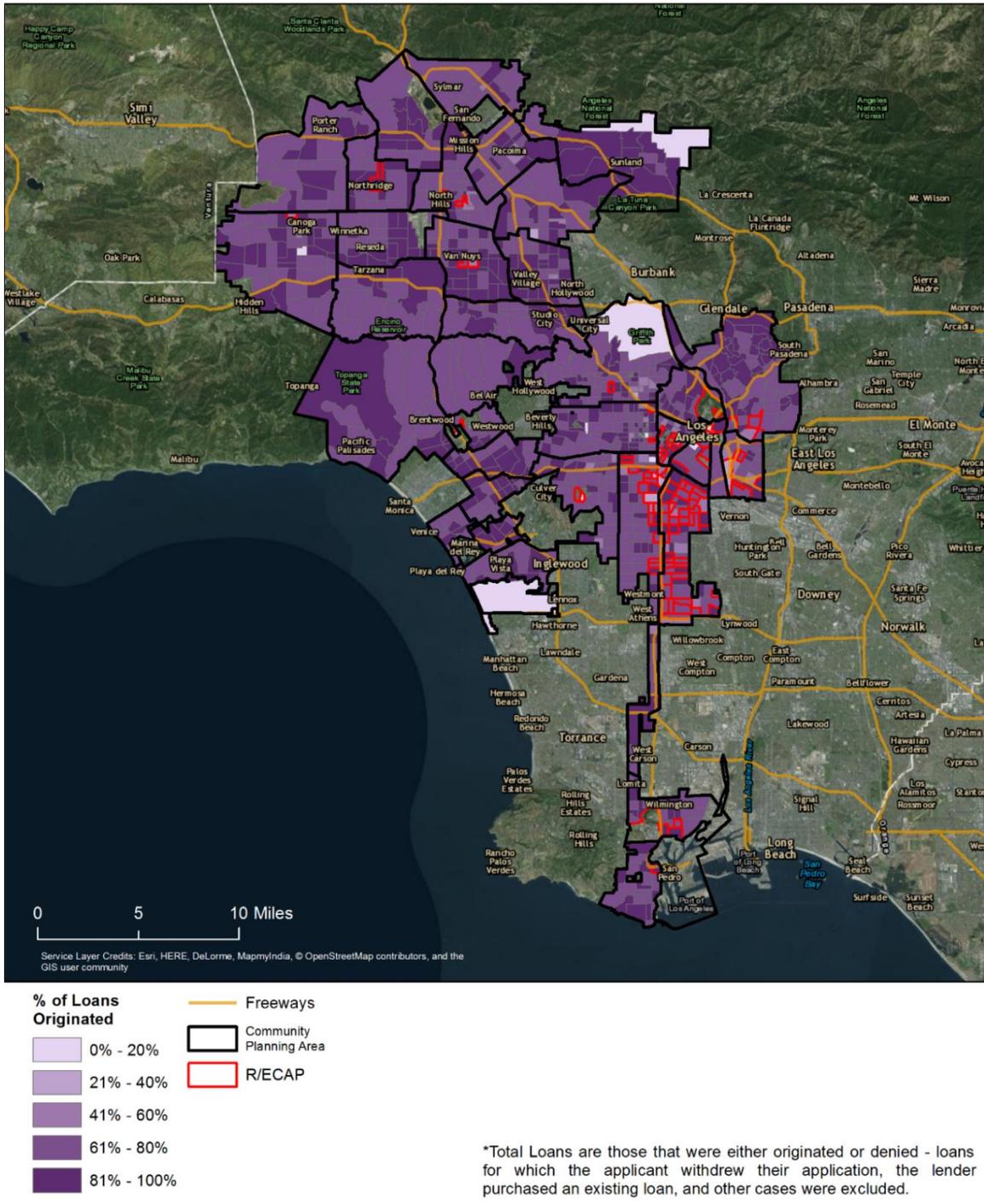


*Total Loans are those that were either originated or denied - loans for which the applicant withdrew their application, the lender purchased an existing loan, and other cases were excluded.

The map above shows that origination rates predictably rose as incomes rose, in this instance with incomes of between 80% and 120% of AMI. Central LA had the lowest origination rates and the Valley had the highest origination rates.

Map 19

City of L.A. AFH: Percent of Loans Originated for Buyers Above 120% of Area Median Income by Census Tract, 2016



The map above shows origination rates for above moderate-income applicants. Origination rates were almost universally high at this level of income though pockets in Central LA with somewhat lower origination rates remained.

Figure 20 City of LA High-Cost Loan Originations and Denials by Race and Ethnicity and Type of Loan

Loan originated (Numbers) (High-Cost)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	37	292	186	515
Black or African American	5	82	51	138
Asian	5	74	36	115
American Indian or Alaska Native		2		2
Native Hawaiian or Other Pacific Islander		7	1	8
Not applicable		9	5	14
Not Hispanic or Latino Total	47	466	279	792
Hispanic or Latino				
Hispanic or Latino Total	28	471	119	618
Not applicable				
Not applicable Total	12	93	56	161
Grand Total	87	1,030	454	1,571
Loan originated (Numbers) (High and non-High cost)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	2,014	11,279	25,268	38,561
Black or African American	270	778	2,545	3,593
Asian	291	2,886	5,039	8,216
American Indian or Alaska Native	11	39	107	157
Native Hawaiian or Other Pacific Islander	30	148	373	551
Not applicable	38	254	707	999
Not Hispanic or Latino Total	2,654	15,384	34,039	52,077
Hispanic or Latino				
Hispanic or Latino Total	826	4,183	9,732	14,741
Not applicable				
Not applicable Total	899	4,090	8,677	13,666
Grand Total	4,379	23,657	52,448	80,484

Source:

[Enterprise tabulation of the 2016 HMDA data, accessed from CFPB](#)

As the table above shows, Black and Hispanic borrowers disproportionately received high cost home purchase loans in comparison to White and Asian borrower. Disparities were less pronounced for other types of loans.

Loan originated (Rates) (High-Cost)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino				
White	2%	3%	1%	1%
Black or African American	2%	11%	2%	4%
Asian	2%	3%	1%	1%
American Indian or Alaska Native	0%	5%	0%	1%
Native Hawaiian or Other Pacific Islander	0%	5%	0%	1%
Not applicable	0%	4%	1%	1%
Not Hispanic or Latino Total	2%	3%	1%	2%
Hispanic or Latino				
Hispanic or Latino Total	3%	11%	1%	4%
Not applicable				
Not applicable Total	1%	2%	1%	1%
Grand Total	2%	4%	1%	2%

Figure 21 LA MSA High-Cost Loan Originations and Denials by Race and Ethnicity and Type of Loan

Loan originated (Numbers) (High-Cost)	Home improvement	Home purchase	Refinancing	Grand Total	Loan originated (rates) (High-Cost)	Home improvement	Home purchase	Refinancing	Grand Total
Not Hispanic or Latino					Not Hispanic or Latino				
White	92	916	497	1,505	White	2%	4%	1%	2%
Black or African American	22	341	115	478	Black or African American	3%	13%	2%	4%
Asian	8	501	96	605	Asian	1%	4%	0%	2%
American Indian or Alaska Native	2	10	2	14	American Indian or Alaska Native	4%	8%	1%	3%
Native Hawaiian or Other Pacific Islander	2	29	7	38	Native Hawaiian or Other Pacific Islander	2%	7%	1%	2%
Not applicable		28	11	39	Not applicable	0%	4%	1%	1%
Not Hispanic or Latino Total	126	1,825	728	2,679	Not Hispanic or Latino Total	2%	4%	1%	2%
Hispanic or Latino					Hispanic or Latino				
Hispanic or Latino Total	90	2,298	385	2,773	Hispanic or Latino Total	3%	14%	1%	5%
Not applicable					Not applicable				
Not applicable Total	33	320	125	478	Not applicable Total	2%	3%	1%	1%
Grand Total	249	4,443	1,238	5,930	Grand Total	2%	7%	1%	3%
Loan originated (Numbers) (High and non-High cost)					Loan originated (Numbers) (High and non-High cost)				
Not Hispanic or Latino					Not Hispanic or Latino				
White	5,064	25,983	63,292	94,339	White				
Black or African American	718	2,681	7,581	10,980	Black or African American				
Asian	1,246	11,364	19,892	32,502	Asian				
American Indian or Alaska Native	49	126	344	519	American Indian or Alaska Native				
Native Hawaiian or Other Pacific Islander	100	436	1,235	1,771	Native Hawaiian or Other Pacific Islander				
Not applicable	121	638	1,964	2,723	Not applicable				
Not Hispanic or Latino Total	7,298	41,228	94,308	142,834	Not Hispanic or Latino Total				
Hispanic or Latino					Hispanic or Latino				
Hispanic or Latino Total	3,065	16,842	35,557	55,464	Hispanic or Latino Total				
Not applicable					Not applicable				
Not applicable Total	2,136	9,625	23,401	35,162	Not applicable Total				
Grand Total	12,499	67,695	153,266	233,460	Grand Total				

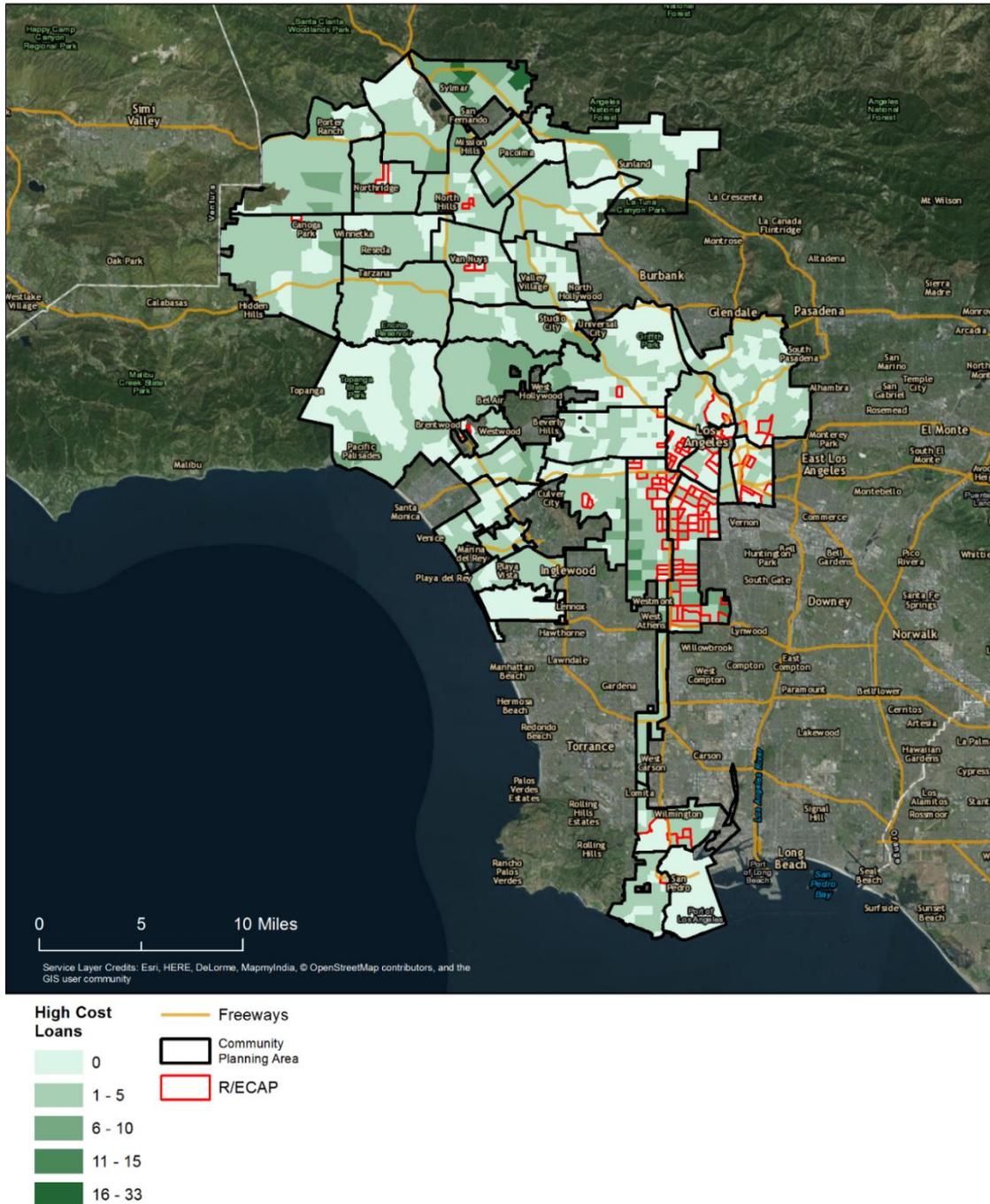
Source:

[Enterprise tabulation of the 2016 HMDA data, accessed from CFPB](#)

The table above confirms the data from the previous table at a broader geographic scale. In the region, Blacks and Hispanics disproportionately received high cost home purchase loans while Whites and Asians do not.

Map 22

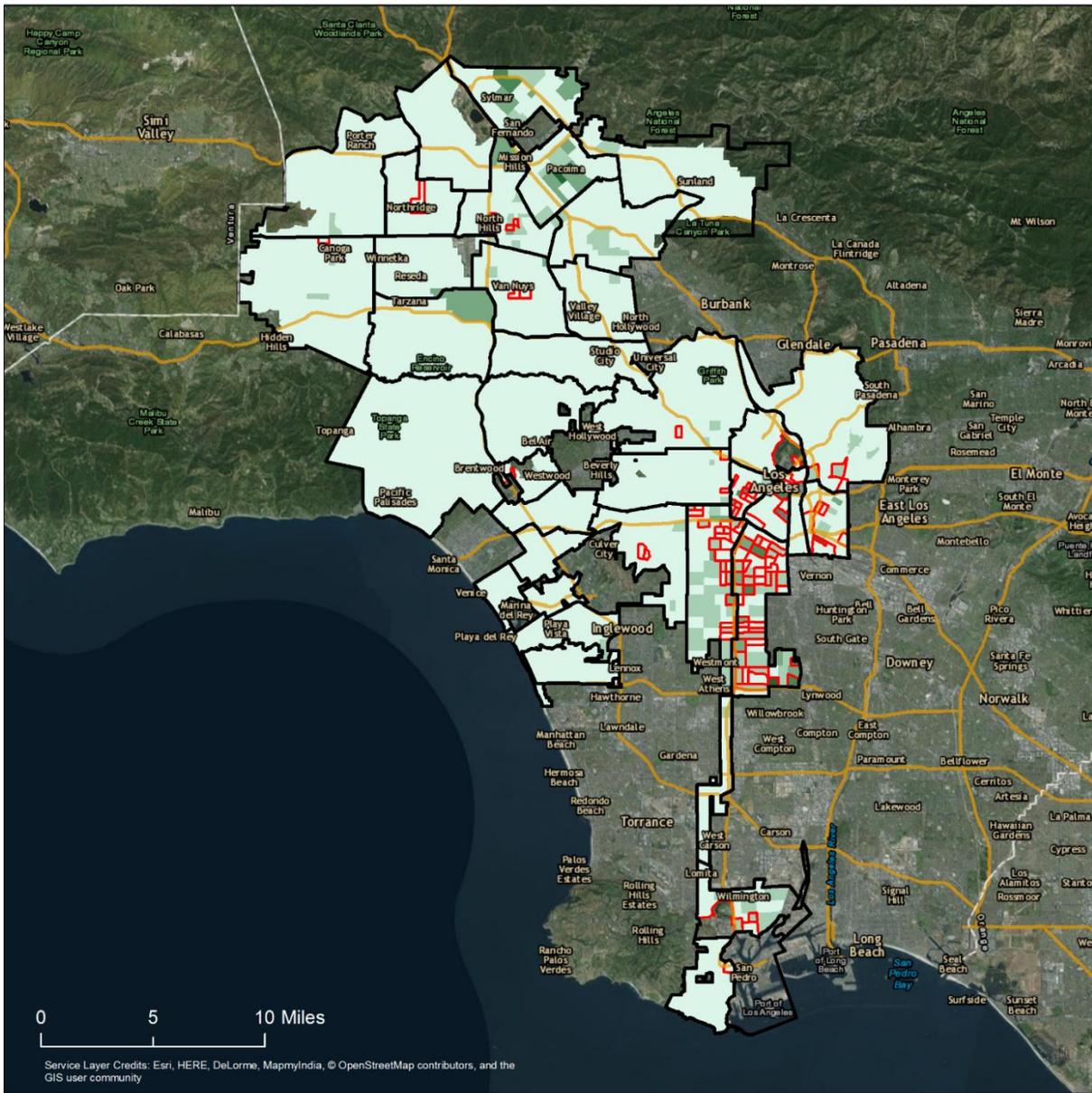
City of L.A. AFH: Number of Originated Loans that were High Cost by Census Tract, 2016



The map above shows that the volume of high cost loan originations was highest in heavily minority communities in South LA and the northeastern portion of the San Fernando Valley. High cost loan volume was lower in Central LA, West LA, and the southwestern portion of the Valley, areas that are either disproportionately White or rapidly gentrifying.

Map 23

City of L.A. AFH: Percent of Originated Loans that were High Cost by Census Tract, 2016



The map above shows that the percentage of loans that were high cost is highest in the heavily Hispanic portion of the northeastern San Fernando Valley. The percentage of loans that were high cost is next highest in South LA. All other areas have low percentages of high cost loans.

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

Lack of local private fair housing outreach and enforcement

This is a significant contributing factor in LA. The public and nonprofit sectors possess substantial capacity, but based on recent studies including the Urban Institute's, *A Paired-Testing Pilot Study of Housing Discrimination against Same-Sex Couples and Transgender Individuals*,²⁵⁹ discrimination against gay males results in higher average annual housing costs than heterosexual men.

HCIDLA administers a contract with the HRC to provide a citywide fair housing program.

In addition to the HRC, the following private organizations provide fair housing legal assistance to residents of LA:

- Inner City Law Center (ICLC), as the only full-time provider of legal services on Skid Row in Downtown LA, combats slum housing while developing strategies to end homelessness. ICLC provides a wide variety of legal services focused mainly on housing and homelessness to low-income individuals and families.
- Neighborhood Legal Services of Los Angeles County (NLSLA) is a private, non-profit law firm advocating for low income residents by providing effective legal representation and a variety of legal services and community education. With a proven track record of leadership and success, NLSLA finds creative solutions to complex problems for nearly 100,000 Angelenos every year.
- Legal Aid Foundation of Los Angeles (LAFLA) has six neighborhood offices, three Domestic Violence Clinics, and four Self Help Legal Access Centers in Los Angeles. LAFLA serves communities as diverse as East LA, West LA, South LA, Pico-Union, Koreatown, and Long Beach. Nearly 12,000 individuals and families are provided with legal services annually and an additional 35,000 litigants are helped through LAFLA's four Self Help Legal Access Centers.
- Bet Tzedek is a non-profit, public interest law firm providing free legal services for the low-income residents, elderly residents, and persons with disabilities in LA County.
- Asian Pacific American Legal Center (APALC), a member of the Asian American Center for Advancing Justice, is the nation's largest legal and civil rights organization for Asian Americans, Native Hawaiians, and Pacific Islanders (NHPI). APALC is based in Downtown LA, with satellite offices in Orange County and Sacramento.

Lack of resources for fair housing agencies and organizations

In the mid-1990s, the HCIDLA's predecessor, Los Angeles Housing Department (LAHD) introduced a competitive process for City funds and increased focus on litigation. LAHD also increased annual funding for citywide fair housing enforcement and services by over 50 percent in 2000 (from \$500,000 to \$770,000). These funds (which include CDBG and local dollars) leverage funds from LA County and other local

²⁵⁹ http://www.urban.org/research/publication/paired-testing-pilot-study-housing-discrimination-against-same-sex-couples-and-transgender-individuals/view/full_report, accessed July 12, 2017.

jurisdictions, and allowed the contractor, Housing Rights Center (HRC), to offer a comprehensive countywide fair housing program with several attorneys on staff. The LAHD began funding a fair housing attorney as part of its fair housing contract approximately 20 years ago. Since that time, HRC has been able to leverage other funds, such as settlement funds and contributions from major law firms, to fund additional positions. HRC funds full-time staff attorneys and a Director of Litigation. HRC has attorneys who litigate its fair housing cases full-time to assist with the recent increase in its litigation efforts. Subcontractors to HRC must also have attorneys on staff or contract to support litigation efforts.

Due to decreases in the City's CDBG allocation, in Fiscal Year 2014-15, HCIDLA provided HRC \$660,500 for fair housing education, outreach and enforcement, a reduction of \$109,500 from previous years. HRC assisted 10,152 individuals with housing concerns, 1,036 of those involved potentially illegal discrimination. HRC conducted 414 factual investigations to remedy possible legal disputes. HRC received an additional \$200,000 from the County for similar services to the County's residents. Earlier this year, HRC completed its third year of a three-year HUD Fair Housing Initiatives Program Private Enforcement Initiative (FHIP-PEI) grant to perform on-site and phone rental testing. HUD's Office of Fair Housing and Equal Opportunity did not release its FHIP-PEI Notice of Funding Availability in time for HRC to maintain its staffing numbers or level of services due to the expiration of its FHIP-PEI grant.

Lack of state or local fair housing laws

Although the California Fair Employment and Housing Act (FEHA) prohibits discrimination on the basis of source of income, its definition of "source of income" does not include Housing Choice Vouchers (HCVs), provided by Public Housing Agencies. Landlords are thus able to refuse to accept HCVs on that basis alone. This fact, combined with conditions in the current housing market - rents higher than the Fair Market Rent paid by HCVs, and low vacancy rates - make it exceedingly difficult for HCV holders to find housing. FEHA's exclusion of HCVs in its "source of income" protection policy disparately impacts Angelenos of color since 77.71% of HCV holders are Black, Hispanic and Asian/Pacific Islander.

Additionally, long-term residents living in Rent Stabilized Housing, disproportionately seniors, who obtain vouchers after years on the waiting list, have been unable to get their landlords to accept them. Landlords often prefer that their long-term tenants vacate their units, which would allow them to raise rents to the market rate.

In addition to supporting state-wide legislation to amend the definition of "source of income" to include Housing Choice Vouchers, the City could consider an ordinance to prohibit Housing Choice Voucher discrimination in the City of Los Angeles, as well as an administrative and legal enforcement mechanism.

V. Fair Housing Goals and Priorities

GOAL 1: INCREASE THE STOCK OF AFFORDABLE HOUSING THROUGHOUT THE CITY, PARTICULARLY IN NEIGHBORHOODS OF OPPORTUNITY.

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
1.1	High	Adopt an Affordable Housing Linkage Fee to fund the City's affordable housing programs and to encourage developers to produce affordable housing in new housing developments	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs; Fair Housing Enforcement, Outreach Capacity and Resources	Displacement Due to Economic Pressures; Location/Type of Affordable Housing; Community opposition	Successful introduction and passage of proposed ordinance, amount of money in fees collected, 1-2 Years, development of approximately 1000 units annually with a \$100,000/unit contribution from the linkage fee, 3-5 years	HCIDLA, DCP, Mayor, City Council
1.2	High	Study the Affordable Housing Linkage Fee's economic impact on the development market and make recommendations to Elected Local Officials for strengthening the inclusionary set-aside requirements of the policy for new housing developments	Segregation/Integration; R/ECAPs; Disparities in Access to Opportunity; Disproportionate Housing Need; Fair Housing Enforcement, Outreach Capacity and Resources	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community Opposition	After the completion of two years of adoption for the linkage fee ordinance, complete an analysis of the policy's impacts and the potential for stronger inclusionary housing requirements, 3-5 Years	HCIDLA, DCP
1.3	High	Identify and allocate city-owned land for affordable housing, particularly in current and emerging high-opportunity areas	Segregation/Integration, Disparities in Access to Opportunity, Disproportionate Housing Needs	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures; Community	Number of parcels and acreage of land acquired for housing, proportion that is within high opportunity areas, 1-5 Years	HCIDLA, HACLA

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
				Opposition; Availability of affordable units in a range of sizes; Private Discrimination; Impediments to Mobility		
1.4	High	Remove barriers to producing affordable housing by streamlining the development process, including in high-opportunity neighborhoods to decrease segregation and increase integration of protected classes (e.g., people with disabilities)	Disparities in Access to Opportunity, Publicly Supported Housing, Segregation/Integration, R/ECAPs	Community Opposition; Zoning and Land Use Laws	Update all 35 community plans by 2024 that will focus on zoning; remove barriers through re:code LA and other city-wide land-use policies; maximize Transit-Oriented Communities development, adoption of a Value Capture Ordinance, and adoption of the Permanent Supporting Housing Ordinance to streamline approvals, Years 1-2; Implementation of newly enacted State housing laws, including SB 35 and related Housing Element changes). Ongoing through Year 5	HCIDLA, DCP, DBS
1.5	High	Increase the stock of affordable housing for people experiencing homelessness using the follow tools/resources: <ul style="list-style-type: none"> • Measure HHH 	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Siting selection policies, practices and decisions for publicly supported housing; Community opposition; Displacement of Residents due to	Number of affordable units built for people experiencing homelessness increases at a rate of 1000 units per year, 1-10 Years	HCIDLA, HACLA

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
		<ul style="list-style-type: none"> • Transit Oriented Communities Program • Updated Density Bonus • Unpermitted Dwelling Unit Ordinance • Shallow Subsidy Program • Comprehensive Homeless Strategy 		Economic Pressure; Community Opposition		
1.6	High	Develop a siting policy for permanent supportive housing development projects and a geographic distribution policy to be presented to Local Elected Officials for consideration and adoption.	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Siting selection policies, practices and decisions for publicly supported housing; Community Opposition	In Year 1 adopt a siting and geographic distribution policies for the development of permanent supportive housing projects in the City. Including the adoption of the PSH Streamlining Ordinance and a Geographic distribution policy to be included in notices of funding issued by the City.	HCIDLA, DCP HACLA
1.7	Medium	Explore the feasibility of adopting and implementing the City's Motel Interim Conversion Ordinance as HACLA proceeds with its HUD-Veteran Affairs Supportive Housing motel conversion program.	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Siting selection policies, practices and decisions for publicly supported housing; Community opposition; Displacement of Residents due to	Successful adoption of the Motel Interim Conversion Ordinance and use of 500 HUD-VASH Project-Based Vouchers, Year 1-5	HCIDLA, HACLA

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
				Economic Pressure; Community Opposition		

Discussion

Background

Los Angeles (LA) has a significant shortage of housing affordable to lower-income households. There are 713,710 households in the City that make less than 80% of Area Median Income (AMI).²⁶⁰ Housing prices in Los Angeles have grown four times faster than incomes since 2000. And almost two-thirds of all households in the City are rent burdened (meaning they spend more than the recommended 30% of their income on rent or mortgage payments).²⁶¹ This shortage of affordable homes disproportionately affects people of color and individuals with disabilities. Within both the City of Los Angeles and the broader region, most racial or ethnic minority groups experience higher rates of housing problems, including but not limited to severe housing cost burden, than do non-Hispanic White households.²⁶² And there is a significant need for accessible housing in the City of Los Angeles. Over 200,000 Los Angeles households include an individual with an ambulatory disability, and over 170,000 include an individual with a visual or hearing disability. People with mobility and sensory disabilities face unique disadvantages when seeking affordable, accessible, community-based housing, not only due to cost, but also because most housing does not include necessary accessibility features. This is especially significant in affordable housing, given the large percentage of people with disabilities whose income is below the poverty line.

However, the existing stock of affordable housing falls well short of the need. As of 2016, the total stock of all housing units in Los Angeles was 1,453,271.²⁶³ The total stock of Publicly Supported Housing (including public housing, project-based Section 8, and other HUD multi-family units) is 34,661 units.²⁶⁴ There are 28,830 low-income units in Low Income Housing Tax Credit (LIHTC) developments in the City of Los Angeles.²⁶⁵ However, between 2017 and 2020, 24% of units are set to expire, with another 35% expiring between 2020 and 2025, and 36% expiring between

²⁶⁰ Publicly Supported Housing Analysis

²⁶¹ Disproportionate Housing Needs Analysis

²⁶² Disproportionate Housing Needs Analysis

²⁶³ <https://www.scag.ca.gov/Documents/LosAngeles.pdf>

²⁶⁴ Publicly Supported Housing Analysis

²⁶⁵ Disability and Access Analysis

2026 and 2030.²⁶⁶ And there are approximately 46,000 Housing Choice Vouchers (HCVs) in use in Los Angeles.²⁶⁷ Adding all these sources together, the existing stock of affordable homes and Housing Choice Vouchers accounts for only about 8% of all housing units in the City of Los Angeles and, therefore, can serve only a small fraction of households making less than 80% of AMI.²⁶⁸ There are also roughly 631,000 units that fall under the City’s Rent Stabilization Ordinance (RSO).²⁶⁹ However, due to vacancy decontrol, where rents can be increased to market rate if a tenant voluntarily moves out or is evicted with cause, it is unclear how many of those units are affordable to lower-income households since the RSO does not require that tenants qualify to rent based on their income. The high percentage of households who are rent burdened indicates that, while RSO housing can help keep rents below market by preventing rental increases, many RSO renters may still be rent-burdened.

In addition, the affordable housing that does exist is disproportionately concentrated in R/ECAPs, which are some of the lowest-opportunity neighborhoods in Los Angeles.²⁷⁰ For example, 9,533, or 27.5%, of the 34,611 Publicly Supported Housing units are in R/ECAPs while only 9.75% of the City’s population resides in R/ECAPs.²⁷¹ Public Housing and LIHTC housing are largely located in segregated, predominantly Hispanic, Asian, and Black neighborhoods. HCV usage is largely located in segregated, predominantly Black neighborhoods on the western side of the central part of the City.²⁷² By contrast, notably less affordable housing is available in neighborhoods of high opportunity in the Northwest and West parts of Los Angeles. Several factors likely contribute to protected classes concentrating in areas that have high exposure to poverty and less access to other amenities such as proficient schools and access to grocery stores and fresh produce.²⁷³ The high cost of land and community opposition from residents in high-opportunity areas creates barriers to affordable housing there.

Strategies

1.1 Adopt an Affordable Housing Linkage Fee to fund the City’s affordable housing programs and to encourage developers to produce affordable housing in new housing developments

To ensure that the City’s significant new market-rate development supports the creation of new affordable housing, the City is in the process of adopting its first mandatory inclusionary program, called the Affordable Housing Linkage Fee. Both new commercial and new residential development generate a need for more affordable homes, either for low-income workers employed in new commercial buildings or for low-income workers needed to provide local services (such as child care, restaurant workers, and landscape workers) to residents of new residential buildings.

²⁶⁶ <https://www.realtor.com/mpf-research/where-affordable-housing-greatest-risk-expiring/>

²⁶⁷ Publicly Supported Housing Analysis

²⁶⁸ Over 700,000 households in the City of Los Angeles make less than 80% AMI as per the Publicly Supported Housing Analysis.

²⁶⁹ <http://HCIDLAla.lacity.org/What-is-Covered-under-the-RSO>

²⁷⁰ Disparities in Access to Opportunity Analysis

²⁷¹ Publicly Supported Housing Analysis

²⁷² Publicly Supported Housing Analysis

²⁷³ Disparities in Access to Opportunity Analysis

This puts additional strain on the existing limited affordable housing stock. A linkage fee is an essential tool to address the affordable housing demand created by new commercial development and by new market-rate rental development. In addition to charging a linkage fee on new commercial and single-family developments, the proposed linkage fee policy will provide an exemption for all new multifamily residential development, both homeownership and rental developments, that include a certain percentage of their units as covenanted affordable housing, with 40% of total units affordable at moderate income levels, 20% at low income, or 11% at very low-income levels. In-lieu of providing those units on-site, developers can choose to pay a fee that was deemed feasible by an independent economic analysis.

1.2 Study the Affordable Housing Linkage Fee’s economic impact on the development market and make recommendations to Elected Local Officials for strengthening the inclusionary set-aside requirements of the policy for new housing developments

After two years of the linkage fee’s implementation, the City will study the economic impacts of the policy, and whether the market could support stronger on-site affordability requirements and/or fee levels in particular submarket regions.

Alternatively, the City could study the adoption of a mandatory inclusionary zoning policy *without* an in-lieu fee option as proposed for the Affordable Housing Linkage Fee. This policy proposal has its challenges, however, because of a prior court decision, which precludes the City from implementing such a mandatory inclusionary policy on rental developments across California. However, there is new State legislation, AB 1505 (Bloom),²⁷⁴ that was recently signed into law by the Governor in September 2017. This new law will now provide localities the authority to adopt inclusionary zoning ordinances that require, as a condition of development of residential rental units, that the development include a certain percentage of residential rental units affordable to, and occupied by, moderate-income, lower-income, very low-income, or extremely low-income households. The City of Los Angeles took a position in support of this legislation and has similarly gone on record supporting past bills with the same intent. The City will explore next steps considering the passage AB 1505.

Similarly, the City is considering how to prioritize meaningful inclusionary requirements and affordable housing funding within any tax increment financing (TIF) program adopted by the City such as Enhanced Infrastructure Finance Districts (EIFDs) and Community Revitalization Investment Areas (CRIAs). However, the limitations on this approach should be noted—EIFDs are adopted by resolution, do not have a mandatory affordable housing set-aside and may take upwards of a decade to generate meaningful returns. EIFDs are not required to have affordable housing set-asides, but may be included on an ad-hoc basis.

The monitoring and enforcement of any mandatory inclusionary zoning policies will be particularly important to determine whether and to what extent these measures are producing the desired outcomes.

²⁷⁴ https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB1505

1.3 Identify and allocate city-owned land for affordable housing, particularly in current and emerging high-opportunity areas

One significant barrier to increasing the stock of affordable housing is access to land. The City is exploring mechanisms to reserve publicly-owned land, especially in neighborhoods of opportunity, for affordable housing. These mechanisms include the Naturally Occurring Affordable Housing (NOAH) pilot program and the disposition of former Community Redevelopment Agency of the City of LA's land for affordable housing. The City of LA is also changing zoning rules on City-owned land that apply to Public Facility zones (which applies on most City owned sites) to facilitate development. This was done in TOC (and several projects plan to use) and go even further in Permanent Supportive Housing (PSH) Ordinance to target those at the deepest affordability levels (0-30% AMI). The City is also exploring ways to support strategic land acquisition by nonprofit developers and community land trusts, including by acquiring smaller multi-family properties that currently provide below market rents and converting them into regulated affordable housing. The New Generation Fund could support these acquisitions, in part, but additional funding sources would need to be identified to support this effort. Flexible funding from a Linkage Fee could support this type of program. HACLA also incentivizes developers of permanent supportive housing to site projects in areas of opportunity through its Project Based Voucher Notice of Funding Availability process which provides bonus points to proposals that locate developments in these areas.

1.4 Remove barriers to producing affordable housing by streamlining the development process, including in high-opportunity neighborhoods to decrease segregation and increase integration of protected classes (e.g., people with disabilities)

To make it easier to build affordable housing throughout the City, and particularly in high-opportunity areas, the City is working to reduce barriers that make affordable housing more difficult, costly, and time-consuming to produce. California Government Code Section 65915, the Density Bonus Program, already offers a menu of incentives to developers to build affordable housing units, while reducing some of the barriers to do so. In addition to the density bonus, these include reduced parking requirements, additional building height, and more. The City will continue to remove barriers that increase the cost and reduce the feasibility of affordable housing production. Key proposed ordinances the City is moving forward on to address existing barriers include the Permanent Supportive Housing Ordinance which would qualify Permanent Supportive housing projects to be eligible for an expedited public benefit application through the Department of City Planning's Priority Housing Project (PHP) Program. The goal of the PHP program is to provide priority case processing for housing projects that include affordable housing, to cut down on the overall timeline and cost of securing planning entitlements.

Further, the State legislature passed a historic housing legislative package which was signed by the Governor in September 2017. Among some of the key new laws is SB 35 that seeks to streamline the approval of affordable housing projects that meet approved criteria as well as many Housing Element law changes that seek to remove further barriers to create new affordable housing. The City will fully engage in the implementation of these new laws as they increase the tools available to the City in addressing barriers to access to affordable housing.

Furthermore, HACLA will also explore the feasibility of using accessory dwelling units as special housing type. Current HUD regulations allow six special housing types where families can reside: Single room occupancy (SRO) housing, congregate housing, group home, shared housing,

manufactured home, and cooperative housing. The unit must meet Housing Quality Standards, including but not limited to sanitary facilities, food preparation and refuse disposal, space and security, thermal environment, illumination and electricity, structure and materials, interior air quality, water supply, lead-based paint, access, site and neighborhood, sanitary condition, and smoke detectors. Special provisions may also be required for utility allowances.

1.5 Increase the stock of affordable housing for people experiencing homelessness using the follow tools/resources:

- Measure HHH
- TOC Guidelines
- Updated Density Bonus
- Unpermitted Dwelling Unit Ordinance
- Shallow Subsidy Program
- Comprehensive Homeless Strategy

The Permanent Supportive Housing (PSH) to be created through Measure HHH funding is intended to provide housing for people experiencing homelessness and in need of service enriched housing, including health services and mental health programs on-site. Homeless families and individuals are a group that consists of predominantly people with disabilities, people of color, and families with children--all are protected under federal fair housing laws. In the coming months, the City Council will review a draft ordinance to streamline the administrative clearance process for qualifying PSH projects. This is designed to facilitate construction of Measure HHH projects. To affirmatively further fair housing it is essential that this ordinance is finalized and passed to ensure the creation of this housing throughout the City.

Additionally, the City recently adopted the Unapproved Dwelling Unit (UDU) ordinance that creates a process by which certain illegal housing units in multi-family buildings can be brought into compliance, provide, certain life safety and affordability requirements are met. Further, the City adopted the TOC guidelines as outlined in Measure JJJ that will facilitate the creation of hundreds of units at 30% of AMI. The City understands the need to rezone appropriate areas and parcels for multi-family housing and make changes to the development and permit process that reduce the cost or time or increase the amount of land where affordable housing can be developed. The above initiatives in coordination with the City's Comprehensive Homelessness Strategy will remove barriers to and streamline the production of affordable housing in high-opportunity areas.

1.6 Develop a siting policy for permanent supportive housing development projects and a geographic distribution policy to be presented to Local Elected Officials for consideration and adoption

The PSH to be created through Measure HHH funding is intended to provide housing for people experiencing homelessness and in need of service enriched housing, including health services and mental health programs on-site. Homeless families and individuals are a group that consists of predominantly people with disabilities, people of color, and families with children—all are protected under federal fair housing laws. In the coming

months, to expedite the constructions of PSH projects, the City Council will review a draft ordinance to streamline the administrative clearance process for qualifying PSH projects. This ordinance is designed to facilitate the construction of PSH projects. To affirmatively further fair housing it is essential that this ordinance is finalized and passed to ensure the creation of this housing throughout the City. The City, HACLA and the County are also executing a Memorandum of Understanding to align resources to create the permanent supportive housing in the City of Los Angeles. The City will provide the capital financing for acquisition, rehabilitation, and construction; will donate land and expedite a process for siting projects. HACLA will provide rental assistance in the form of project-based vouchers for the tenants. The County will provide supportive services to the tenants in the form of intensive case management services, which includes connection to appropriate medical, mental health and substance abuse services, as well as rental assistance. In conjunction with the above efforts, the City will also work to develop and propose a Geographic Distribution criteria and policy for areas of opportunity as identified in the AFH Plan. Said geographic criteria is to be based on the geospatial analysis of HUD provided data and local data, including the concentration of affordable housing production, Project Based Section 8 Vouchers, low-income areas and other factors. The adopted Geographic Policy will then be included in City-issued notices of funding availability (e.g. HHH NOFA) to further expedite the production of PSH projects from a zoning and public financing approach.

1.7 Explore the feasibility of adopting and implementing the City's Motel Interim Conversion Ordinance as HACLA proceeds with its HUD-VASH motel conversion program

The City will work on the successful adoption and implementation of the Motel Interim Conversion Ordinance. HACLA will proceed with implementation of its 500 HUD-VASH Project-Based Vouchers in its motel conversion program. Under this program, eligible units are existing residential housing units requiring minimal rehabilitation, or other structure types such as motels and hospitals that can be converted to residential use. The goal is to provide affordable housing with an array of supportive services for homeless and chronically homeless veterans. Under the agreement, developers will purchase underutilized, often run-down motels from private owners and convert them to efficiency apartments. HACLA will provide housing assistance payments, which will cover veterans' rent and partnering agencies will provide supportive services, including case management and counseling.

GOAL 2: PRESERVE THE EXISTING STOCK OF AFFORDABLE RENTAL HOUSING AND RENT STABILIZED HOUSING

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
2.1	High	Develop a citywide no-net-loss of affordable housing policy that is included in land-use plans, local laws, community plans, and RFPs for funding for affordable housing	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Lack of private investment in specific neighborhoods; Location and type of affordable housing; Availability of affordable units in a range of sizes	Net change in affordable housing, 1-5 Years	HCIDLA, DCP
2.2	High	Increase dedicated City staff to support non-financial restricted affordable housing preservation initiatives including the maintenance of an early warning system to track at-risk housing, notification enforcement, as well as property owner and tenant outreach and education efforts	R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Location and type of affordable housing; Displacement of residents due to economic pressures; Availability of affordable units in a range of sizes	Annual publication of reports documenting status of the affordable housing units at risk of expiring in the next 5 years, units lost, and other initiatives. Report on allocation of staff, enhancements and resources. 1-5 years	HCIDLA
2.3	High	Extend affordability restrictions through loan extensions, workouts and buy-downs of affordability	R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Location and type of affordable housing; Availability of affordable units in a range of sizes	Obtain approval and allocation of buy-down funding, Year 1; Preserve 50 units through buy-downs of affordability or extensions, 1-2 years; Offer incentives to City restricted properties expiring in the next 5 years	HCIDLA

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
2.4	High	Strengthen and expand education and outreach to tenants and owners of affordable rental housing at risk of conversion to market rents that include options for nonprofits and/or tenants to purchase expiring properties	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Displacement of residents due to economic pressures; Lack of affordable, accessible housing in a range of unit sizes; Community opposition; Impediments to mobility; Quality of affordable housing information programs	Annual publication of reports documenting funding for outreach services; outreach and education efforts; termination notices received and enforced, 1-5 years.	HCIDLA
2.5	Medium	Enhance enforcement of codes and regulations around habitability	R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Location and type of affordable housing; Displacement of residents due to economic pressures; Community opposition; Impediments to mobility; Lack of access to opportunity due to high housing costs	Quality and quantity of enforcement actions brought, rates and timeliness of compliance, 1-4 Years	HCIDLA
2.6	Medium	Preserve at-risk housing through the issuance of Tax-Exempt Bond financing	R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Location and type of affordable housing; Availability of affordable units in a range of sizes	Assist in the preservation of over 200 at-risk units through the issuance of Tax-Exempt Bond Financing, 1-5 years	HCIDLA

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
2.7	Medium	Explore the development of a pilot multi-family over-the-counter rehabilitation loan program	R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Location and type of affordable housing; Availability of affordable units in a range of sizes	Recommend and obtain funding and approval for pilot program, 1 year; Target 100 at-risk HUD Project-Based Section 8 properties, 1-2 years	HCIDLA
2.8	High	Support the implementation of mandatory seismic retrofits of soft-story buildings	Disparities in Access to Opportunity, Disproportionate Housing Needs	Lack of Outreach Capacity and Resources, Location and type of affordable housing; Lack of private investment in specific neighborhoods, Displacement of residents due to economic pressures	Develop outreach and education strategy and funding strategy, Year 1 (2018); Retrofit 1500 buildings, Year 2 (2019), Retrofit 2400 buildings per year, Years 3-7 (2020-2024); 13,500 buildings by 2024	HCIDLA, DBS, Mayor

Discussion

Background

As noted above, most racial or ethnic minority groups experience higher rates of housing problems, including but not limited to severe housing cost burden, than do non-Hispanic White households.²⁷⁵ Given the shortage of housing affordable to lower-income households, to reduce (or at least not exacerbate) these disproportionate housing needs, it is essential that the existing stock of restricted affordable housing be preserved. However, these restricted affordable units are at risk of being lost through multiple mechanisms.

Regulated apartments in some neighborhoods have an economic incentive to exit from government restrictions and increase their asking rents to market-rate levels. This is particularly true in desirable, high-opportunity neighborhoods where apartments can command a high, market-rate rent.

²⁷⁵ Disproportionate Housing Needs Analysis

A series of affordability regulations on deed-restricted affordable units, particularly HUD-assisted units, are set to expire over the next five years. The California Housing Partnership Corporation projects that about 14,000 units spread across 232 buildings in Los Angeles County are at “very high” (within one year) or “high” (between one to five years) risk of being converted to market rates over the next five years with a significant percentage of those units residing within Los Angeles City limits.²⁷⁶ HCIDLA’s at-risk early warning system indicates there are 11,771 units that are at risk of being converted to market rates over the next five years as a result of a combination of termination of restrictions tied to covenants and termination of HUD rental assistance contracts. Approximately 55% of these units are at risk of expiration/termination through 2018.²⁷⁷ These units have been priced at below-market rates for typically 20 to 40 years as a condition of obtaining public financing, rental assistance contracts or permission to build. But with these expiring affordability restrictions, some property owners are deciding to take advantage of the County’s hot housing market.²⁷⁸ The City is already experiencing a loss of rent-stabilized units; from 2001 to June 2017, the City of Los Angeles lost 22,131 Rent Control Units from the rental market for permanent removal or demolition.²⁷⁹ Over the last five years, the City permanently lost approximately 2,205 restricted affordable housing units within 156 properties through a combination of covenant expirations, termination of restrictions and termination of rental assistance contracts.

At a time when the City is facing a severe housing crisis, the recently adopted Unapproved Dwelling Unit (UDU) ordinance will help protect the City’s stock of affordable housing units. Each year, between 400 and 500 housing units are removed from the market as an unintended result of the Systematic Code Enforcement Program’s periodic inspection of all multi-family units. This has resulted in the displacement of low- and moderate-income households. Most of these units are removed because of zoning violations which could not be easily addressed under the previous rules in existence. The recently adopted (May 2017) UDU ordinance creates a process by which certain illegal housing units in multi-family buildings can be brought into compliance, provided certain life safety and affordability requirements are met.

In addition, as described above, the City is in the process of significantly revising multiple land-use plans to allow more development. New development in neighborhoods that have under-resourced schools and lack access to adequate jobs and transportation options has the potential to increase access to opportunity for current residents of those neighborhoods—for example, new commercial space can bring new job opportunities to the neighborhood—*if* those current residents can afford to stay in the neighborhood when investment occurs. On the other hand, if existing affordable homes are demolished to accommodate newly-planned development, reducing the total stock of affordable homes that have the potential to *increase* housing cost burdens. And demolishing existing affordable homes in neighborhoods of high opportunity would reduce the ability for low-income residents to stay in or move to those neighborhoods, thereby reducing access to opportunity.

²⁷⁶ California Housing Partnership, Risk Level by County (2017)

²⁷⁷ (Department, HCIDLA Report Back: Regarding Preservation of At-Risk Affordable Housing Initiatives)

²⁷⁸ Disproportionate Housing Needs Analysis

²⁷⁹ [City of Los Angeles Housing Element](#)

Strategies

2.1 Develop a citywide no-net-loss of affordable housing policy that is included in land-use plans, local laws, community plans, and Requests for Proposals for funding for affordable housing

To address the challenges posed by the loss of the existing stock of affordable housing and to preserve as many units as possible, the City is considering including a “no net loss” policy, requiring one-for-one replacement of affordable units (regulated affordable housing, RSO units, and units in areas deemed low-income per State Density Bonus Law) that are to be demolished, have expired covenants/restrictions, or are removed from the rental market. A “no net loss” policy could apply to projects that receive public subsidy, zoning benefits, or use of public land. Given the significant number of land-use plans that are being updated in the near future, it is particularly essential that a “no net loss” policy be applied to any plan-wide upzoning or other increases in density.

The City already requires one-for-one replacement of recently constructed affordable, rent-stabilized housing²⁸⁰ for projects that use the density bonus program²⁸¹ within five years of demolishing the original structure or the TOC Affordable Housing Incentive program.²⁸² The TOC program also requires one-for-one replacement of units occupied by lower income households.²⁸³ These requirements can be expanded to apply more broadly to all types of affordable housing and in broader geographical areas. To prevent the loss of affordable apartments, the City may also consider limiting condominium conversions and demolitions—for example, placing a moratorium on condominium conversions when a certain vacancy rate is reached—and explore requiring a building permit to be secured before issuing a demolition permit. HCIDLA and the LA Department of City Planning are currently reviewing part of “Ellis Part II.”

In addition to “no net loss” on a parcel-specific basis, the City will begin to examine the feasibility of designating “no net loss” zones on an area-wide basis. These zones could be designated based on the Los Angeles Index of Displacement Pressure, for example.²⁸⁴ In these zones, the City may consider tracking RSO units removed and the corresponding rental rate at the time of removal. HCIDLA is currently implementing the pilot phase of the new Rent Registry Program that mandates the collection of rental rates for all units subject to the RSO. This new program will enable the City to respond more swiftly and to assist in identifying rental rate trends throughout the City to inform future policies to both help protect and build affordable housing.

²⁸⁰ No net less also applies to RSO properties that were demolished and replaced within five years. <http://www.latimes.com/local/lanow/la-me-ln-housing-ellis-act-20170404-story.html>

²⁸¹ <http://plan.lamayor.org/portfolio/housing-and-development/>

²⁸² https://planning.lacity.org/ordinances/docs/TOC/TOC_FAQ.pdf

²⁸³ Ibid

²⁸⁴ <https://www.arcgis.com/home/item.html?id=70ed646893f642ddbca858c381471fa2>

Enforcement of these policies will require the City to dedicate the necessary resources to monitor and properly enforce existing and newly adopted ordinances and programs to address the potential loss of existing affordable housing.

2.2 Increase dedicated City staff to support non-financial restricted affordable housing preservation initiatives including the maintenance of an early warning system to track at-risk housing, notification enforcement, as well as property owner and tenant outreach and education efforts

To respond to the threat of the expiration and termination of restricted affordable housing, HCIDLA re-established an enhanced preservation program (Program) in early 2016. The sole purpose of this Program is to integrate non-financial and policy components with financial initiatives to preserve at-risk restricted affordable housing.²⁸⁵ Through the Program, HCIDLA manages an internal database that tracks and analyzes expiring Federal, State and local covenants and rental subsidy contracts in the City. The Program proactively tracks properties that file notifications of intent to terminate affordability restrictions or rental assistance. The Program also includes conducting outreach and education to property owners and residents living in at-risk housing with the goal of minimizing potential tenant displacement and incentivizing owners to stay in the Program by employing financial strategies to extend affordability through loan extensions and affordability buy-downs. The HCIDLA is working on recommendations for new financial and non-financial tools (see strategies below). The continuation and allocation of staff and resources are vital in realizing the preservation of at-risk affordable housing goals and strategies. As such, the City must add additional dedicated staff and funding to support these critical efforts.

2.3 Extend affordability restrictions through loan extensions, workouts and buy-downs of affordability

The City, through HCIDLA, employs financial strategies to incentivize property owners to extend affordability restrictions through loan extensions and buy-downs for affordability. Within its portfolio, the City has at-risk covenanted properties with loan balances that mature prior- or post-covenant expiration. A loan balance provides potential leverage opportunities for HCIDLA to negotiate with owners and extend affordability restrictions through a loan and covenant extension. Also, HCIDLA can compensate owners of projects without debt for foregone revenues over the term of the extended covenant through a buy-down of affordability. HCIDLA uses a financial preservation model to evaluate the potential cost of buying affordability of units where an owner is interested in extending expiring restrictions. Based on HCIDLA's analysis and buy-down model of expiring CRA/LA properties in 2015, HCIDLA estimates that the average cost of buying down affordability is approximately \$53,000 per unit. HCIDLA is in the process of recommending flexible funding to continue to offer affordability buy-downs citywide.

²⁸⁵ (Department, HCIDLA Report Back: Regarding Preservation of At-Risk Affordable Housing Initiatives)

2.4 Strengthen and expand education and outreach to tenants and owners of affordable rental housing at risk of conversion to market rents that include options for nonprofits and/or tenants the opportunity to purchase expiring properties

As part of its preservation initiatives, the City through HCIDLA proactively tracks Notices of Intent (a State law requirement) to terminate affordability covenants and rent subsidies at twelve and six months of the date of expiration. This law also provides the City and mission-driven developers with the opportunity to make an offer to purchase the property. HCIDLA also utilizes the law as a tool to provide sufficient time to create strategies that minimize impacts to residents. As outlined above, the HCIDLA conducts direct tenant outreach and education to residents and property owners of identified at-risk housing. Further enhancing and expanding these efforts is critical to ensure the preservation of this vulnerable expiring housing stock.

The tracking, notification, enforcement and tenant outreach initiatives are key strategies to ensure that properties remain affordable with a minimal risk of tenant displacement. To further the goal of preservation, HCIDLA is working with the City Attorney's Office to build on positive gains to-date. The City needs to continue to strengthen its capacity to preserve existing affordable housing by scaling its efforts to enforce State notice requirements when owners fail to comply with notice laws, which provide tenants, nonprofit housing providers, and local officials the necessary time to develop preservation strategies and acquire necessary and flexible financial resources to incentivize owners of this housing stock to expand the affordability restrictions. As such, the City Council directed HCIDLA to begin working on a draft local Notice Ordinance to adopt local notification requirements and formally scale the City's enforcement efforts. Meaningful outreach and education to tenants and owners of at-risk subsidized housing typically needs to begin at least three years prior to the expiration date. To implement these more proactive monitoring activities, the City must ensure additional dedicated staff and funding is in place to support these efforts.

2.5 Enhance enforcement of codes and regulations around habitability

One strategy to preserve the existing stock of affordable housing is to ensure those homes remain habitable. The City of Los Angeles has made some notable and proactive efforts and improvements in enforcing rules and regulations around habitability like the Systematic Code Enforcement Program (SCEP). Since 1988, the City has been operating the Rent Escrow Account Program (REAP), which ensures that tenants throughout the City live in safe and habitable units by creating financial disincentives for the delinquent property owners to continue the habitability, health, and safety violations in their multi-family rental properties. By removing the Housing Code violations and maintaining their properties, the property owners restore their rental income, and going forward their rehabilitated properties can benefit from lower maintenance costs and vacancy rates. Consequently, the useful life of rental properties in Los Angeles is extended. The Los Angeles City Council recognized REAP in 2013 for its contributions to the City's goals of a safe, habitable, and sustainable housing stock.

Also, in response to stakeholder input, starting in FY 2017-18, HCIDLA will implement an Enhanced Repair Program and regular enforcement of lead-safe work practices utilizing containment. In addition, HCIDLA has established a system of pre-inspection and pre-repair conferences with

property owners with the objective of achieving quality repairs. In collaboration with other organizations, HCIDLA has improved and shortened the complaint response time.

The City is assessing the enforcement of its program to track abandoned properties. The City is particularly interested in properties that, if brought back into habitable use, could be utilized for affordable housing.

2.6 Preserve at-risk housing through the issuance of Tax-Exempt Bond financing

The City of Los Angeles, through HCIDLA, acts as the primary issuer of tax-exempt and taxable multifamily housing bonds for qualified developments located in the City. The City maintains the role of primary issuer in view of the potentially substantial impact of housing development projects to the neighborhood, and citizens of the City of Los Angeles. The HCIDLA has the authority to issue bonds for affordable housing projects for their development, rehabilitation, and preservation. During 2015-2016, the HCIDLA assisted in the preservation of approximately 500 HUD assisted units through the issuance of tax-exempt bonds. The City must continue efforts to promote its program and issue tax-exempt bonds to help preserve at-risk affordable properties.

2.7 Explore the development of a pilot multi-family over-the-counter rehabilitation loan program

Most at-risk properties have been in service for more than 30 years and the stock continues to age. Property owners of small at-risk portfolios may not have the capacity or “know how” to go through a refinance and/or an allocation of Low Income Housing Tax Credits to rehabilitate their properties. Various cities around the country have established housing rehabilitation programs that provide funds to repair multi-family properties. HCIDLA is exploring a pilot multi-family over-the-counter rehabilitation program as a viable option to extend and repair the stock of restricted properties. This strategy must, to succeed, be funded with flexible funds to strategically target at-risk HUD Project-based Section 8 units.

2.8 Support the implementation of mandatory seismic retrofits of soft-story buildings

In 2015, the City of Los Angeles established a historic mandatory building retrofit ordinance to ensure that LA’s most vulnerable structures are strengthened to prevent loss of life in the event of a major earthquake. Approximately 13,500 soft-story multi-family buildings were identified for mandatory retrofits, which began in 2016. Building owners have a total of seven years to retrofit these buildings, nearly all of which are rent stabilized. Rent Stabilized properties reside, disproportionately, in R/ECAPs and areas with high percentages of racial and/or ethnic minorities. In 2018, the City will begin to identify properties that are not in compliance with the first of three deadlines for the soft-story retrofit program. These property owners may need additional public/private support to address any hardships that prevent the successful retrofitting of these vulnerable buildings.

GOAL 3: PREVENT DISPLACEMENT OF LOW- AND MODERATE-INCOME RESIDENTS

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
3.1	High	Expand and strengthen support against unjust evictions, including just cause evictions, rent control policies	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Location and Type of Affordable Housing; Displacement of Residents Due to Economic Pressures	Introduction (1-4 years) and passage (5-10 years) of language designed to strengthen “just cause” eviction requirements, number of enforcement actions taken to implement new ordinance	HCIDLA, City Council, Mayor
3.2	High	Develop and implement an acquisition and rehabilitation loan program for small multi-family properties located in areas experiencing displacement pressures. Use a set of identified metrics to help determine impacted areas in the City.	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Lack of private investment in specific neighborhoods; Location and type of affordable housing; Availability of affordable units in a range of sizes	Increase in the number of interventions to prevent the loss of affordable housing and older housing stock, 1-5 Years; Adopt LA NOAH Loan Program, Years 1-2	HCIDLA
3.3	High	Explore the feasibility of a “Right to Counsel” Ordinance to protect tenants’ legal rights.	Disparities in Access to Opportunities, Disproportionate Housing Need	Private discrimination; Displacement of Residents due to Economic Pressures; Lack of affordable, accessible housing in a range of unit sizes; Displacement of and/or lack of housing support for victims of domestic	Publish feasibility report in Year 1 and draft Right to Counsel Ordinance and forward to Mayor and City Council for consideration, in Year 2 based on the outcome of the feasibility report	HCIDLA, HACLA, City Council, tenants’ rights organizations, fair housing agencies, legal services organizations

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
				violence, dating violence, sexual assault, and stalking; Lack of meaningful language access for individuals with Limited English Proficiency; Impediments to mobility; Quality of affordable housing information programs		
3.4	High	HCIDLA to collaborate with HACLA to examine the feasibility of achieving consistency between standards (HQS, SCEP violations and LA Municipal Code standards) for privately owned housing to reduce displacement	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Private Discrimination; Displacement of Residents Due to Economic Pressures; Availability of Affordable Units in a Range of Sizes; Location and Type of Affordable Housing	Reduction in the number of individuals and families displaced, 1-5 Years	HACLA, HCIDLA
3.5	Medium	Establish a working group comprised of tenants, landlords, attorneys and judges to explore the creation of a housing court	Disparities in Access to Opportunity, Disproportionate Housing Needs	Displacement of Residents Due to Economic Pressures	Production of a report detailing the findings and recommendations of the working group, 1-2 Years	HCIDLA, Mayor, City Council and key City Departments and stakeholder groups

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
3.6	Medium	Strengthen the Rent Stabilization Ordinance awareness comprehensive tenant outreach and education campaign on tenants' rights, obligations, and resources in multiple languages; prioritize resources in areas most likely to experience displacement	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Private discrimination; Displacement of Residents due to Economic Pressures; Lack of affordable, accessible housing in a range of unit sizes; Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking; Lack of meaningful language access for individuals with Limited English Proficiency; Impediments to mobility; Quality of affordable housing information programs	Number of events held and publications created, number of attendees at events, number of copies of publications distributed, geographic location of in-person events, and ensure that all vital documents for program participation are available in threshold languages 1-5 Years	HCIDLA, Mayor's Office, HACLA, City Council, tenants' rights organizations, fair housing agencies, legal services organizations

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
3.7	Medium	Stabilize families and neighborhoods by increasing homeownership opportunities to residents of the City of Los Angeles	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Displacement of Residents Due to Economic Pressures	Number of loans in high opportunity areas on an annual basis by council district, 2 – 5 Years	HCIDLA
3.8	Medium	Study the feasibility of a flexible rent subsidy program to stabilize low-income renters and homeowners and/or elderly residents and tenants occupying below market rate rent controlled units	Segregation/Integration, Disparities in Access to Opportunity, Disproportionate Housing Needs	Displacement of Residents Due to Economic Pressures	Publish feasibility report, 1-3 Years	HCIDLA
3.9	Medium	Use best practice models for meaningful community engagement in planning and development decisions	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Displacement of Residents Due to Economic Pressures; Availability of Affordable Units in a Range of Sizes; Location and Type of Affordable Housing; Community Opposition	Adoption of changes to Community Participation Plan, finalization and implementation of HACLA's Vision Plan, Community Plan Updates and the General Plan, 1-5 Years	HCIDLA, HACLA, DCP
3.10	Medium	Coordinate with LAPD on the review and potential revision of their training curriculum addressing landlord/tenant disputes and fair housing to ensure protections for all	Disparities in Access to Opportunity, R/ECAPs, Segregation/Integration	Public and Private Discrimination; Displacement of Residents Due to Economic Pressures	Review LAPD training curriculum and present recommended revisions, Year 1; Identify and assign appropriate staff for delivery of updated	HCIDLA, HACLA, LAPD, and LADWP

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
		members of protected classes under Federal, State and Local laws			trainings with LAPD, Years 1-5; LAPD will be better equipped to ensure protections for members of protected classes, Years 1-5	
3.11	Medium	Develop mechanisms to encourage landlords to accept third-party checks from tenants (e.g., domestic violence victims) to reduce payment discrimination through the creation of a task force	Disparities in Access to Opportunity, R/ECAPs, Segregation/Integration, Disproportionate Housing Needs	Private Discrimination; Displacement of Residents Due to Economic Pressures; Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking	Develop task force group to explore City policy changes, convene landlord discussions, domestic violence shelter providers, and hold tenant/targeted group meetings to develop strategies, 1 – 3 years	HCIDLA, HACLA, and Family Source Centers

Discussion

Background

Displacement of residents due to economic pressures is a significant contributing factor if not the largest contributing factor, to disproportionate housing needs in the City of Los Angeles and the broader region. Over the last decade, the City has faced a serious affordable housing crisis that was, in part, caused by decades of insufficient housing production, particularly in predominantly non-Hispanic White, high-opportunity areas, coupled with growing gentrification in more diverse neighborhoods.²⁸⁶ Mayor Garcetti has made housing production and affordability a key part of his “pLAN” for the City, including developing 100,000 new housing units as well as preserving and building 15,000 affordable units by 2021. However, some observers believe that the 100,000 planned units may not be enough to meet the demand and slow rent increases.²⁸⁷ Also, many

²⁸⁶ <http://www.abundanthousingla.org/2017/01/03/dont-call-it-a-boom-la-housing-growth/>

²⁸⁷ <http://plan.lamayor.org/portfolio/housing-and-development/>

landlords offer affordable units only because they are obligated to do so under the contracts they sign with the City when new projects are being developed. When those contracts expire, landlords can turn affordable units into more profitable, market-rate housing. The worst-case scenario is that as many as 15,000 affordable units will be converted to market rate by 2021, although it is expected that a significant percentage of these units will receive annual renewals.²⁸⁸

Also, unless steps are taken to mitigate the effects of development on low-income renters of color, the City's development strategy could have unintended consequences. For example, a disproportionate share of the City's new permitting has been concentrated in areas near Downtown and in transit corridors, areas that have limited though increasing overlap with high opportunity areas.²⁸⁹ Although the expansion of public transportation into West LA and the Valley through the Expo Line and the Red Line has increased new construction in high opportunity areas, if new development is going to further the goals of fair housing and desegregation, measures must be taken to ensure that new development is both available to members of protected classes and spread widely across the City, including in West LA and Valley neighborhoods not served by new transit lines.

When investments are made in majority-minority areas, the City must ensure that they do not displace current residents. For example, a University of California Los Angeles (UCLA) study shows that non-Hispanic White, college educated populations tend to move into areas with newly developed public transportation.²⁹⁰ While this may result in economic development and higher property values for homeowners in previously under-invested neighborhoods, in order for integration to be stable, the relocation of non-Hispanic White households to neighborhoods with concentrations of Black and Hispanic renters must not result in the wholesale displacement of people of color from those communities. Los Angeles has the highest rentership rate of any metropolitan area in the country.²⁹¹ Demographically, people of color and low-income tenants make up a disproportionately large share of the renter-population and therefore are most likely to be vulnerable to displacement.²⁹² In Echo Park, many Hispanic families that have been living there for decades have been displaced due to increasing demand to move into the neighborhood.²⁹³ Similar trends are displacing residents across the City in neighborhoods like Koreatown, Mid-City, Westlake, and more.²⁹⁴ Consequently, displaced low-income people of color are forced into an ever-decreasing stock of affordable housing, much of which is in relatively high-poverty areas, allowing R/ECAPs to emerge and perpetuating segregation.

²⁸⁸ <http://www.scpr.org/news/2015/08/03/53498/affordable-housing-disappearing-as-contracts-expir/>

²⁸⁹ <http://www.abundanthousingla.org/2017/01/03/dont-call-it-a-boom-la-housing-growth/>

²⁹⁰ <http://www.urbandisplacement.org/case-studies/ucla>

²⁹¹ Harvard Joint Center for Housing; America's Rental Evolution -- Evolving Markets and Needs

²⁹² Id.

²⁹³ <http://www.latimes.com/local/california/la-me-0315-lopez-echo-20150313-column.html>

²⁹⁴ <https://la.curbed.com/2016/8/30/12712942/gentrification-map-los-angeles-county>

Strategies

3.1 Expand and strengthen support against unjust evictions, including just cause evictions, rent control policies

The City of Los Angeles has a Rent Stabilization Ordinance (RSO) and requires "just cause" before tenants in rent-controlled buildings can be evicted. The City also has adopted numerous ordinances to strengthen its RSO in the past year and a half, including: Tenant Buy-out Notification Program, 14 RSO Technical Amendments, and RSO Ellis Amendments. The LA Rent Registry Ordinance went into effect in October 2016, began implementation in 2017, and has tenant notifications scheduled to go out in 2018. The City is also reviewing additional motions and recommendations to expand protections against unjust evictions.

These protections preserve and create more affordable housing and make it harder to displace, otherwise compliant, low-income tenants. The City is exploring expansion of the "just cause" eviction policy beyond just RSO units. Given the correlation between race and income in the City, this often means people of color being pushed out and White people moving in. Additionally, voucher holders with disabilities are being evicted before they can find alternate housing, effectively forcing tenants to move outside of LA City or LA County and, thereby, increasing lengths of commutes and travel costs, and potentially rendering some of the City's most vulnerable residents homeless. If people cannot afford to live close to their employment it makes LA less competitive as it becomes increasingly difficult for corporations to attract talent due to the lack of affordability. The City is advocating for state repeal of the Costa-Hawkins Act, and continues to pursue ways to strengthen its RSO should such state action occur the City will consider applying the RSO to new rental properties, including single-family homes.

3.2 Develop and implement an acquisition and rehabilitation loan program for small multi-family properties located in areas experiencing displacement pressures. Use a set of identified metrics to help determine impacted areas in the City

Naturally Occurring Affordable Housing (NOAH) refers to residential rental properties that lack public subsidy and whose rents are relatively low compared to the regional housing market. Due to the City's existing need for additional affordable housing it cannot afford to lose any of its NOAH stock.

The City is developing a model to proactively incentivize the acquisition and rehabilitation of this specific smaller housing stock. In addition to the development of this new loan program, in Fiscal Year (FY) 2018-19, the City is planning to transition to a two-tiered system for the Systematic Code Enforcement Program (SCEP) program, in which noncompliant properties will be moved into an every two-years cycle for inspection. This will be a key step to increasing the frequency of inspections of non-compliant properties. This new component of the SCEP program can be used as a tool to assist in identifying older and smaller multi-family properties that may require intervention and potential candidates for the new loan program.

3.3 Explore the feasibility of a “Right to Counsel” Ordinance to protect tenants’ legal rights

Thousands of residents are displaced annually due to evictions. According to the LA Superior Court, 47,966 eviction actions were filed in LA County in Fiscal Year 2016-2017.²⁹⁵ In past years, that figure has surpassed 72,000. These numbers do not account for tenants that have other types of problems including illegal lock outs, illegal utility terminations, notices to quit, severe breaches of warranty of habitability leading to “slum” conditions, and discrimination cases.

Per tenants’ rights advocates, many evictions occur because tenants do not understand their rights and/or their obligations and because they lack representation even though California’s Sargent Shriver Civil Counsel Act provides low-income tenants free legal representation in all eviction matters, including nonpayment of rent. In 2016, existing services met just under 13% of the needs of tenants facing eviction, leaving an “access to justice” gap of 87%. This is a marked improvement from 2002 when 72,000 evictions were filed and 1,300 households were represented, leaving an access justice gap of more than 98%. This decrease in the number of filings is likely the result of increased representation; New York City had a similar experience as representation increased.

The Inner City Law Center estimates that 98% of tenants who go to court without representation lose, even when they have a viable defense. On the other hand, studies have found that evictions decrease by 77% when tenants have access to a lawyer.²⁹⁶ The Inner City Law Center reports that, of the clients it represents, 42% defeat eviction and 58% negotiate a “soft landing” where clients settle with a transition plan to ensure stability. The Eviction Defense Network (EDN) also reports that, while in previous years 96-99% of its clients settled with a transition plan that ensured stability to the household, in the first quarter of 2017, 87% of the EDN caseload was waiting for a trial assignment rather than settling. This may be attributable to rents that acutely escalated in the last quarter of 2016 which is forcing tenants to fight to remain in their units.

Although the Sargent Shriver Civil Counsel Act expanded resources for eviction defense in Los Angeles, the level of state funding provided is not sufficient to ensure that representation is a right that can be fulfilled on demand. Legal services providers in Los Angeles do not currently have the resources to guarantee representation to every income-eligible tenant involved in an eviction proceeding. Measure H funding for homelessness prevention can be used for outreach, education and tenant legal representation in eviction proceedings.

3.4 HCIDLA to collaborate with HACLA to examine the feasibility of achieving consistency between standards—Housing Quality Standards and Systemic Code Enforcement Program violations and LA Municipal Code standards—for privately owned housing to reduce displacement

HACLA conducts Housing Quality Standards (HQS) inspections of program participant units to ensure that the units are in decent, safe and sanitary condition. When deficiencies are cited, the landlord is required to repair them or face termination of the rental assistance contract/subsidy. To reduce

²⁹⁵ <http://www.lacourt.org/newsmedia/uploads/142017105142756AnnualReport2017-compressedfile.pdf>

²⁹⁶ http://www2.nycbar.org/pdf/report/uploads/SRR_Report_Financial_Cost_and_Benefits_of_Establishing_a_Right_to_Counsel_in_Eviction_Proceedings.pdf

the number of instances where contracts are terminated, HACLA will coordinate with HCIDLA to exchange information that would enable HCIDLA to notify landlords when HACLA HQS deficiencies/violations are also SCEP (Systematic Code Enforcement Program) violations that need to be corrected to gain better compliance for both programs.

3.5 Establish a working group comprised of tenants, landlords, attorneys and judges to explore the creation of a housing court

Housing Courts have proven to be an effective tool to reduce evictions by providing alternative resolutions. The first step toward creating a Housing Court in LA would be to establish a working group comprised of tenants, landlords, attorneys and judges to assess its feasibility and applicability.

The goal of the Housing Court would be to reduce the number of evictions by:

1. Increasing renters' access to information, legal advice, and representation through a Right to Counsel Ordinance;
2. Providing one-time emergency assistance to low-income tenants to stop evictions from proceeding;
3. Encouraging fair out-of-court resolutions through negotiation and mediation;
4. Reducing legal fees for landlords associated with evictions by simplifying the eviction process;
5. Exploring the establishment of escrow accounts for conditions that constitute a threat to life, health, or safety when the landlord fails to repair serious or dangerous defects in a rental unit; and
6. Proposing anti-displacement mechanisms for tenants in below market subsidized or rent controlled units.

Partners to support a venture like a Housing Court in Los Angeles may include the State Bar Association, which would be similar to the District of Columbia Bar Association's support of counsel for tenants of subsidized housing. Additional partners may include local law schools.

3.6 Strengthen the Rent Stabilization Ordinance awareness comprehensive tenant outreach and education campaign on tenants' rights, obligations, and resources in multiple languages; prioritize resources in areas most likely to experience displacement.

When investments are made in majority-minority areas, the City must ensure that they do not displace current residents. For example, a University of California Los Angeles (UCLA) study shows that non-Hispanic White, college educated populations tend to move into areas with newly developed public transportation.²⁹⁷ While this may result in economic development and higher property values for homeowners in previously under-invested neighborhoods, in order for integration to be stable, the relocation of non-Hispanic White households to neighborhoods with concentrations of Black and Hispanic renters must not result in the wholesale displacement of people of color from those communities. Demographically, people of color and low-income tenants make up a disproportionately large share of the renter-population and therefore are most likely to be vulnerable to displacement.²⁹⁸ In Echo Park, many Hispanic families that have been living there for decades have been displaced due to increasing demand to move into the

²⁹⁷ <http://www.urbandisplacement.org/case-studies/ucla>

²⁹⁸ Id.

neighborhood.²⁹⁹ Similar trends are displacing residents across the City in neighborhoods like Koreatown, Mid-City, Westlake, and more.³⁰⁰ Consequently, displaced low-income people of color are forced into an ever-decreasing stock of affordable housing, much of which is in relatively high poverty areas, allowing R/ECAPs to emerge and perpetuating segregation.

The City has already done significant work to identify specific neighborhoods that are most at risk of displacement, through the Los Angeles Index of Neighborhood Change and the Los Angeles Index of Displacement Pressure. The Mayor’s Office Innovation Team, or i-team, used this work to assist with site selection for the RSO Outreach Campaign, the Secondary Unit Prototyping Project, the Legacy Business Program, and the Youth in Neighborhood Councils project.

The City will consider the i-team’s model and their data tools to prioritize resources for tenant outreach, education, and services in areas most likely to experience displacement. More specifically, HCIDLA has heightened its RSO education/awareness campaign since 2011 when HCIDLA engaged a consultant with a focus on social/community outreach to design the new outreach campaign. Further, in 2016 HCIDLA worked with the i-team to design a program to expand RSO awareness, with a focus on preventing the displacement of Los Angeles renter residents and ensuring that renters know about the protections under the RSO. The new outreach efforts have included: creation of a special internet address “HomeforLarenters” that links to renters’ information on the HCIDLA website; collaboration with tenant advocacy groups; creation of new informational materials, which have been widely distributed; and development of a special transit-focused campaign with advertisements featuring real Los Angeles renters throughout the City on LA Metro and DASH buses, bus shelters, and transit stations. This campaign will be enhanced further with development of a second phase and round of new written outreach materials. This second phase will feature information on the City’s recently adopted protections regulating Tenant Buy-Out and “Cash for Keys” agreements, which often are the first sign of threatened tenant displacement, as well as information on the Rent Registry Program implemented in 2017. The current and upcoming campaign will also focus on fair housing and rights of immigrant tenants. The second round of transit advertisements is slated for 2018. Data mining and research are being utilized to target outreach efforts to the areas housing the City’s most vulnerable tenants. New technologies are being utilized to expand access to RSO information, such as the implementation of an RSO “Text-It” tool that will provide information on the RSO status of a property through texting. Lastly, in 2018, HCIDLA will outreach to all RSO units for the first time through a Rent Registry notification/verification program.

3.7 Stabilize families and neighborhoods by increasing homeownership opportunities to residents of the City of Los Angeles

Homeownership is a vitally important element in stabilizing and sustaining neighborhoods and communities in Los Angeles. Unfortunately, the ability to afford a home in Los Angeles has become increasingly difficult for low-and moderate-income residents. Currently, the City’s homeownership rate is the lowest in the nation at just 35.97%, which is a decrease of 2.67% from 38.64% in 2008.³⁰¹ This is 27.53% less than the

²⁹⁹ <http://www.latimes.com/local/california/la-me-0315-lopez-echo-20150313-column.html>

³⁰⁰ <https://la.curbed.com/2016/8/30/12712942/gentrification-map-los-angeles-county>

³⁰¹ Source: U.S. Census Bureau 2015 and 2008 American Community Surveys

current overall national average of 63.5%.³⁰² Based on reported trends, the City's low homeownership rate is widely attributed to factors such as income inequality, housing unaffordability and rising housing costs³⁰³.

According to the Los Angeles Times, home prices in Southern California and across the nation have risen steadily in recent years--the result of an improving economy, low mortgage interest rates and a shortage of available homes for sale.³⁰⁴ Additionally, Los Angeles home values have increased 8.6% over the past year and are expected to rise 1.3% within the next year.³⁰⁵ As mentioned above, contributing to the steady rise in home prices is the low inventory of homes for sale and the scarcity and high cost of land, which has resulted in an increase to the median home value in Los Angeles that now has risen to \$616,900. In evidence of the above, the high cost of purchasing a home in Los Angeles is an overwhelming obstacle for first-time homebuyers, especially for low- and moderate-income homebuyers who often have lower credit scores, less savings and irregular income. These barriers to homeownership are even more significant for those homebuyers that lack sufficient funds for down payment, closing costs, acquisition financing and affordable mortgages. Collectively, these barriers make it very difficult for first-time borrowers to enter the homeownership market.

As a result, HCIDLA staff will begin an outreach program to provide information regarding the City's homeownership programs to faith-based and community-based organizations, Neighborhood Councils and to the City's largest employers. HCIDLA will also increase its social media footprint to promote the programs including updates to the homeownership program. Further, the City recently approved HCIDLA's efforts to expand the homeownership first-time purchase assistance program to reach households earning up to 150% of AMI.

3.8 Study the feasibility of a flexible rent subsidy program to stabilize low-income renters and homeowners and/or elderly residents and tenants occupying below market rate rent controlled units

Studies have demonstrated the success of shallow, short-term or onetime rent subsidy programs with services coordination support for low- and very low-income renters and homeowners who are already stably housed. As of 2014, there were 25 state-funded homelessness prevention programs that provide assistance to prevent households from becoming homeless. This supports recent federal policy priorities embracing these interventions as best practices for people at-risk of homelessness.³⁰⁶ Homelessness prevention assistance involves the provision of funds to address a temporary

³⁰² Source: U.S. Census Bureau, Residential Vacancies and Homeownership in the Third Quarter 2016

³⁰³ Source: UCLA Report Impacts of the Widening Divide, August 5, 2015

³⁰⁴ Khouri, A., November 29, 2016, Southern California home prices jump, U.S. values surpass bubble-era peak. The Los Angeles Times

³⁰⁵ Source: Zillow.com

³⁰⁶ United States Interagency Council on Homelessness. (2010). Opening Doors: Federal Strategic Plan to Prevent and End Homelessness. www.usich.gov/opening_doors/

crisis, such as rent or utility arrears. Due to the level and type of intervention, homeless prevention models of assistance are designed to target those households that have fewer barriers to housing and that have resources to sustain that housing after the assistance ends.³⁰⁷

3.9 Use best practice models for meaningful community engagement in planning and development decisions

Community opposition is a significant contributing factor to segregation in the City of Los Angeles and the broader region. In recent years, community opposition has played a role in hindering the development of high-density or affordable housing, both of which are disproportionately occupied by people of color. Examples of Not in My Backyard (NIMBY) activism include community opposition against a new zoning plan for Hollywood that would have allowed for the construction of buildings with greater density and height, especially around transit areas. Best practices models for community engagement have proven to be effective in combating NIMBY efforts.

For example, HACLA is currently undertaking a twenty-five-year Vision Plan to address and prioritize capital investments in its existing assets, develop strategies to improve the Authority's current affordable housing programs, provide impact-driven services and enrichment opportunities to its residents and increase the City's supply of affordable housing. The Vision Plan intends to integrate and transform HACLA's existing housing into communities of opportunity. Rehabilitation and new construction projects recommended under the Vision Plan will bring HACLA's housing stock into the 21st Century; including meeting modern standards for unit size, meeting and exceeding ADA compliance, energy efficiency and building in space for co-located amenities. Much of HACLA's existing housing stock is sited in disadvantaged communities. The investment in these properties will be accomplished through strong community input and will ensure non-displacement of existing tenants. The sites are large enough that any new construction project can typically support the incorporation of enhanced or new services and amenities, like fresh food access, green space, improved security and street grids allowing improved mobility, as well as after school and job training programs offering economic equity.

Additionally, the City is engaged in an aggressive schedule to update all its Community Plans and the update of the City's General Plan. This Planning related initiative will include robust community engagement to help inform these plans.

3.10 Coordinate with Los Angeles Police Department on the review and potential revision of their training curriculum addressing landlord/tenant disputes and fair housing to ensure protections for all members of protected classes under Federal, State and Local laws

Police Officers often serve as the first responders to landlord/tenant or neighbor/neighbor disputes. Many of these issues can be resolved in civil court. These disputes can be related to many issues including unlawful lockouts and evictions; unlawful entry; no heat and termination of essential services; and, criminal damage to a landlord's property. The laws, ordinances, policies and procedures tend to be prescriptive for the responding

³⁰⁷ Technical Assistance Collaborative. (2014). State Funded Housing Assistance Programs. <http://www.tacinc.org/media/43566/State%20Funded%20Housing%20Assistance%20Report.pdf>

officers. However, how to deal with issues pertaining to fair housing tends not to be quite as clear. And, at times, the landlord/tenant or neighbor/neighbor dispute can be based on membership in a protected class.

The Fair Housing Act states, that “it shall be unlawful to coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of that person having exercised or enjoyed, or on account of that person having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by this part.

(c) Conduct made unlawful under this section includes, but is not limited to, the following:

- (1) Coercing a person, either orally, in writing, or by other means, to deny or limit the benefits if person relating to the sale or rental of a dwelling or relating to a residential real estate-related transaction because of race, color, religion, sex, handicap, familial status, or national origin.
- (2) Threatening, intimidating or interfering with persons in their enjoyment of a dwelling because of the race, color, religion, sex, handicap, familial status, or national origin of such persons, or of visitors or associates of such persons.
- (3) Threatening an employee or agent with dismissal or an adverse employment action, or taking such adverse employment action, for any effort to assist a person seeking access to the sale or rental of a dwelling or seeking access to any residential real estate-related transaction, because of the race, color, religion, sex, handicap, familial status, or national origin of that person or of any person associated with that person.
- (4) Intimidating or threatening any person because that person is engaging in activities designed to make other persons aware of, or encouraging such other persons to exercise, rights granted or protected by this part.
- (5) Retaliating against any person because that person has made a complaint, testified, assisted, or participated in any manner in a proceeding under the Fair Housing Act.
- (6) Retaliating against any person because that person reported a discriminatory housing practice to a housing provider or other authority.”

Additionally, when a policy or practice that restricts the availability of housing on the basis of nuisance conduct and has a disparate impact on individuals of a particular protected class (race, religion, color, national origin, sex, familial status, disability, sexual orientation, gender identity, medical condition, age, marital status and others), the policy or practice is unlawful under the Fair Housing Act if it is not necessary to serve a

substantial, legitimate, nondiscriminatory interest of the local government, or if such interest could be served by another practice that has a less discriminatory effect.

The purpose of this strategy is to work with LAPD to ensure they have the latest information related to landlord/tenant disputes and fair housing incorporated into their officer training curriculum. HCIDLA will work with LAPD to review and update their training curriculum to addresses landlord/tenant laws and disputes and fair housing laws.

3.11 Develop mechanisms to encourage landlords to accept third party checks from tenants (e.g., domestic violence victims) to reduce payment discrimination through the creation of a task force

An issue exists with some landlords refusing to accept third party checks from tenants. For example, survivors of domestic violence experience difficulty from some landlords who do not want to accept rental payment from a service provider. This results in survivors considering unsafe living arrangements or being exposed to a threatening living environment due to a landlord’s refusal to accept third party checks.

GOAL 4: ENSURE EQUAL ACCESS TO HOUSING FOR PERSONS WITH PROTECTED CHARACTERISTICS, LOWER-INCOME, AND HOMELESS RESIDENTS.

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
4.1	High	Study the feasibility to develop a pilot County-funded Rental Assistance Program	Segregation/Integration, Disparities in Access to Opportunities, Disproportionate Housing Needs	Displacement of Residents due to Economic Pressures; Lack of affordable, accessible housing in a range of unit sizes; Community opposition; Impediments to mobility; Lack of access to opportunity due to high housing costs	Create an ad hoc committee of landlords, landlord industry groups, property management companies, government agencies, tenants and tenant advocates to study and design a pilot City-funded Rental Assistance Program, Year 1; Send request for proposed pilot for Elected Officials for consideration and approval of pilot and identification of funding, Year 2	HCIDLA, HACLA, Los Angeles County

4.2	High	Expand source of income protections to include Housing Choice Vouchers and seek improvements to the Section 8 program to incentive landlords to participate in the program	Segregation/Integration, Disparities in Access to Opportunities, Disproportionate Housing Needs	Displacement of Residents due to Economic Pressures; Lack of affordable, accessible housing in a range of unit sizes; Community opposition; Impediments to mobility; Lack of access to opportunity due to high housing costs	Introduction and passage of proposed ordinance, reduction in number of facially discriminatory housing advertisements; 3-5 Years	HCIDLA, HACLA, City Council
4.3	High	Establish a working group consisting of stakeholders to study the feasibility of implementing an anti-tenant harassment ordinance	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs	Displacement of Residents due to Economic Pressures; Lack of affordable, accessible housing in a range of unit sizes; Community opposition; Impediments to mobility; Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking	Develop feasibility report for adoption of a Tenant Harassment Ordinance with recommended model based on analysis of similar ordinance, Year 1	HCIDLA, HACLA, City Council
4.4	High	Ensure HACLA policies and practices advance equal access to housing (reasonable accommodation, eligibility)	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity,	Private Discrimination; Displacement of Residents Due to	Incorporation of changes into Annual Plan, ACOP, and Section 8	HACLA

		discretion, partnership with law enforcement in evictions, use of arrest records)	Disproportionate Housing Needs	Economic Pressures; Availability of Affordable Units in a Range of Sizes; Location and Type of Affordable Housing; Displacement of and/or lack of housing support for victims of domestic violence	Administrative Plan, 1-5 Years	
4.5	High	Enforce fair housing protections for LGBT protected classes, including gender non-conforming and non-binary persons	Disparities in Access to Opportunity	Lack of Local Public Fair Housing Enforcement; Lack of Local Private Fair Housing Enforcement, Private Discrimination	Number of complaints filed with DFEH by Housing Rights Center (HRC), 1-5 Years	HCIDLA, HACLA, Mayor, City Council
4.6	High	Strengthen fair housing protections regarding ancestry and national origin (including immigrants and refugees) that prevent disclosure or threats to disclose tenants' immigration or citizenship status to authorities.	Disparities in Access to Opportunity	Lack of Local Public Fair Housing Enforcement; Lack of Local Private Fair Housing Enforcement, Private Discrimination	Introduction and passage of proposed ordinance, number of complaints filed, 1-5 Years	HCIDLA, HACLA, Mayor, City Council
4.7	High	Ensure the Coordinated Entry System matches people with physical disabilities with	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs; Fair Housing	Inaccessible government facilities or services;	Implement and enforce appropriate waiting list policies for people with	HCIDLA, HACLA, Los Angeles Homeless Services

		designated accessible housing units	Enforcement, Outreach Capacity and Resources	Community Opposition	physical disabilities in the CES	Authority (LAHSA), United Way of Greater LA (local Continuum of Care/CES Provider)
4.8	Medium	Ensure people with disabilities who cannot provide detailed personal/medical information still have access to the Coordinated Entry System	Segregation/Integration, R/ECAPs, Disparities in Access to Opportunity, Disproportionate Housing Needs; Fair Housing Enforcement, Outreach Capacity and Resources	Inaccessible government facilities or services; Community Opposition	Implement training and policies for CES addressing the needs of people with disabilities and reasonable accommodations	HCIDLA, HACLA, United Way (local Continuum of Care)

Discussion

Background

The entire City is experiencing unprecedented housing burdens. Residents in the City of Los Angeles tend to have higher rent burdens as compared to residents of the region at large. Within the City of Los Angeles, the areas with the greatest housing burdens are in the San Fernando Valley, the Eastside, including Boyle Heights, and South LA. These areas have higher minority populations, are more segregated, and have higher concentrations of R/ECAPs. In general, the City’s segregated, heavily non-Hispanic White areas have relatively low levels of housing burden. Also, although Asian and Pacific Islander residents have a relatively low rent burden overall, Koreatown, Chinatown, and Little Tokyo all have concentrations of foreign-born residents in areas of high housing burden.

Within both the City of Los Angeles and the broader region, most racial or ethnic minority groups experience higher rates of housing problems, including but not limited to severe housing cost burden, than do non-Hispanic White households. The only exception to this is the Asian Pacific Islander population, which experiences higher rates of housing problems than non-Hispanic White households but lower rates of severe housing cost burden. Among all racial or ethnic groups, Hispanic households are most likely to experience severe housing problems and Black households are most likely to experience severe housing cost burden. Families with five or more members experience housing problems at the highest rate, followed by non-family households. Small families with four or fewer members experience housing problems at the lowest rate of any household type. Disparities between small and large families are less pronounced for severe cost burden than they are for other types of housing problems. The total percentage of households with housing problems and severe housing problems is greater in the City than in the region.

Although the experience of homelessness is not reflected in HUD-provided data regarding the prevalence of housing problems, the homelessness problem in LA is arguably one of the most pressing housing problems in Los Angeles and provides a stark illustration of the disproportionate housing needs of protected classes in the area. The 2017 Greater Los Angeles Homeless Count revealed that the number of homeless people grew by 20% in the City and 23% countywide in just one year. Mayor Eric Garcetti and other City officials have cited many of the factors that contribute to disproportionate housing needs, like increasing rent burdens, stagnant wages, and lack of affordable housing, as drivers to the rapid increases in homelessness in the City.³⁰⁸ Of the around 34,000 people who are experiencing homelessness in Los Angeles, only one in four is sheltered – either in long-term transitional housing or temporary emergency shelter.³⁰⁹ The vast majority of LA’s homeless population is living on the streets.

Homelessness, like other issues of displacement and housing burdens, particularly impacts protected classes. People of color are heavily overrepresented in the area’s homeless population, specifically Black and Hispanic individuals. Although just under 10% of the City’s population identifies as Black, Black individuals and families represent 44% of the City’s homeless population.³¹⁰ Together, Black and Hispanic individuals make up almost 75% of the City’s homeless population.³¹¹ The Hispanic population is also the fastest growing demographic newly experiencing homelessness.³¹²

A significant and growing portion of the homeless population also reports one or more serious disability. From 2016 to 2017, the homeless population reporting a developmental disability and HIV/AIDS grew by 90% and 86% respectively.³¹³ Those that report a disability are also less likely to be sheltered than their non-disabled counterparts.³¹⁴ Other groups that have experienced marked increases in homelessness are unaccompanied minors, veterans, and those who are homeless as a result of domestic violence, increasing by 152%, 137%, and 128% respectively between 2016 and 2017.³¹⁵

Strategies

4.1 Study the feasibility to develop a pilot City-funded Rental Assistance Program

During the community engagement process, landlords cited the administrative burden of the federally funded, locally administered Housing Choice Voucher Program (HCVP) that helps low-income families, the elderly and persons with disabilities afford decent, safe housing in the private market as a deterrent to participating in the program. Together, landlords, landlord industry groups, government agencies, tenants, tenant advocates and the City can design a more flexible and practical locally funded Rental Assistance Program as a pilot program approach to address current administrative barriers.

³⁰⁸ <http://www.latimes.com/local/lanow/la-me-ln-homeless-count-20170530-story.html>

³⁰⁹ 2017 Greater Los Angeles Homeless Count - Data Summary - City of Los Angeles

³¹⁰ Id

³¹¹ Id

³¹² Id

³¹³ Id

³¹⁴ Id

³¹⁵ Id

4.2 Expand source of income protections to include Housing Choice Vouchers and seek improvements to the Section 8 program to incentivize landlords to participate in the program

To allow more low-income residents who hold Housing Choice Vouchers (HCV) more equal access to housing opportunities, the City acknowledges the value in expansion of source-of-income protections to include Housing Choice Vouchers. Consequently, the City will continue to advocate for State-level legislation providing this protection. Source-of-income protections would greatly increase Los Angeles' HCV success rate from the current 67%, helping 13,000 or more Angelenos with vouchers obtain affordable homes in higher-opportunity areas. This protection would also address pretextual discrimination. Elsewhere in California, Santa Clara County has banned HCV discrimination in its unincorporated areas, Santa Monica has passed a law prohibiting the practice in City limits, and San Jose is considering a similar measure.³¹⁶ The City is researching the lessons learned from the development, implementation, and enforcement of these measures and apply them to its approach. HACLA to convene a working group of landlords to seek input on improvements to the program to incentivize landlords to participate.

4.3 Establish a working group consisting of stakeholders to study the feasibility of implementing an anti-tenant harassment ordinance

There are two proposed City ordinances aimed at addressing gaps in tenant protections against landlord harassment based on national origin. CF # 17-0461 asks the City to mirror and expand protections cited in state bill AB 291, a bill which the City supported. CF #14-0268-S13 asks the City to, based upon a review of other California cities' ordinances, protect tenants from harassment that forces them to "voluntarily move out" rather than being evicted. The City is evaluating the potential of combining both motions. The City adopted the Tenant Buyout Program (also known as Cash for Keys) on January 25, 2017. Through its third week of September 2017, the Program has received just under 700 filings from its adoption; 142 RSO tenant complaints have been filed during this period for alleged Tenant Buyout Program violations (i.e., tenant wants to cancel buyout, owner failed to give disclosure notice, landlord verbally offers money in exchange to move out).

4.4 Ensure HACLA policies and practices advance equal access to housing (reasonable accommodation, eligibility discretion, partnership with law enforcement in evictions, use of arrest records)

The Americans with Disabilities Act and Section 504 of the Rehabilitation Act require that federally-assisted programs like the Housing Authority provide reasonable accommodations for persons with disabilities. HACLA has a policy and mechanism in place to grant reasonable accommodations when clients request them. While the policy indicates that "it is the responsibility of the Client to identify the type of accommodation best suited to their disability needs," the policy also states that "HACLA will seek to identify and eliminate conditions that create barriers to equal opportunity and, whenever possible, will make physical and procedural changes in order to reasonably accommodate people with disabilities."³¹⁷

³¹⁶ Disability and Access Analysis

³¹⁷ Nondiscrimination on the basis of disability and reasonable accommodation policy. (2013)

<http://www.hacla.org/Portals/0/Attachments/Residents/MPP%20125%20-%201-11-2013%20FINAL.pdf>

HACLA is interested in proactively working with disability advocates to minimize termination of tenancy, when avoidable, for residents/participants with disabilities. This is especially critical for participants with disabilities that inhibit their ability to complete their housing search before their voucher expires and for participants who require additional time to complete renewal paperwork because of their disabilities.

As part of the 2018 Agency Plan process, the Housing Authority is proposing to amend the criminal background screening for HCV admissions. If approved by HUD, prior drug-related and violent criminal activity will not be grounds for denial of admission.

The HACLA does not utilize arrest records by themselves in determining eligibility for admission or continued participation in any of its housing programs. HACLA's policies has been, even prior to the HUD November 2015 PIH notice, an attempt to "achieve a sensible and effective balance between allowing individuals with a criminal record to access HUD-subsidized housing and ensuring the safety of all residents of such housing." HACLA does not have a "one-strike" policy regarding criminal records and admission, except for those federally mandated items regarding life-time sex-offender registrars and past eviction from federally assisted housing due to production of methamphetamines and drug related activity. In accordance with the PIH Notice, it has always been HACLA's policy and practice to "consider all of the circumstances relevant to the particular admission or eviction decision, including but not limited to: the seriousness of the offending action; the effect that eviction of the entire household would have on family members not involved in the criminal activity; and the extent to which the leaseholder has taken all reasonable steps to prevent or mitigate the criminal activity."

HACLA will annually analyze its denial, termination, and eviction statistics to ensure that there is no systemic or unattended pattern of denial towards any protected class due to its policies. HACLA continues to work with law enforcement to incorporate reasonable safeguards and it conducts, annually, a review to ensure compliance with the HUD guidance including its compliance regarding the use of arrest records in housing decisions, including terminations. HACLA will review its Community Safety Partnership program with the LAPD and the joint HACLA and LAPD searches of public housing tenants.

To address the comments received during the 2018 Agency Plan process that "HACLA could help house approximately 1,000 homeless individuals each year" by removing eligibility barriers that stand in the way of the City's Comprehensive Homeless Strategy, HACLA has agreed to eliminate its ban for violent and drug related criminal activity for applicants. HACLA is concerned about applicants remaining successfully housed over time, however, and to address that issue is asking the advocate community to assist in identifying and/or providing supportive services to those clients from programs that do not receive that assistance. It is also worth noting that HACLA has also implemented a Re-entry Demonstration Program to reunify formerly incarcerated persons with their families receiving Section 8 assistance.

The HACLA is reducing barriers to admission to its programs while balancing the need to maintain program integrity through enforcement of program rules with adequate due process safeguards for participants. This proposed criterion for new admissions, if approved by HUD, will apply to families who submit an online application to participate in a lottery for a position on the Section 8 Waiting List. The Section 8 Waiting List Lottery opens at 6:00 AM on Monday, October 16, until 5:00 PM (Pacific Time), on Sunday, October 29, 2017. A random lottery will decide who gets placed on the Waiting List, so applications can be submitted at any time during the two-week open application period. A preference for housing assistance will be given to applicants who live, work, or have been hired to work within the City of Los Angeles, and to applicants who are veterans or have a household member who is a veteran of the US military, released from such military service under conditions other than dishonorable. After the open period closes, a lottery will be conducted to select 20,000 applications to be placed on the Waiting List for the Section 8 program. An

outreach process was developed that allows equal access for submission of applications by all eligible persons from throughout the Housing Authority's jurisdiction, including but not limited to persons with disabilities, seniors and individuals with limited English proficiency, which complies with Section 8's Equal Opportunity Housing Plan. Partnerships were established with key agencies and community organizations to train them to provide assistance to applicants in completing on-line applications during the two-week open application period. A call center would also provide special assistance to applicants requiring reasonable accommodations due to a disability, including the need for communication in an alternative format as well as for those who require language translation services.

4.5 Enforce fair housing protections for LGBT protected classes, including gender non-conforming and non-binary persons

Transgender, gender non-conforming and non-binary persons, particularly African American and Latina transgender, gender non-conforming and non-binary persons, face additional barriers to accessing affordable housing. After holding a discussion group specifically with the LGBTQ community as part of the City's AFH community engagement process, participants in the discussion explained that the discrimination that many within this group have faced have led transgender, gender non-conforming and non-binary persons to turn to illegal ways to earn income. This criminal activity, consequently, may reduce their chances at accessing publicly-supported housing that requires a criminal background check. The City of Los Angeles is interested in partnering with advocates of transgender, gender non-conforming and non-binary persons to review and, potentially, revise shelter and homeless service policies that disproportionately impact their ability to access, safe, decent, and affordable housing.

The Urban Institute study demonstrates that gay men and transgender, gender non-conforming and non-binary persons are disproportionately discriminated against in access to housing compared to cisgender³¹⁸ and straight men. The City must better enforce fair housing laws and regulations with respect to this protected class.

4.6 Strengthen fair housing protections regarding ancestry and national origin (including immigrants and refugees) that prevent disclosure or threats to disclose tenants' immigration or citizenship status to authorities.

The City supported the passage of Assembly Bill 291³¹⁹ to strengthen legal protections for immigrants. This bill would:

- Prohibit landlords from threatening to report tenants to immigration authorities, either in retaliation for asserting their rights or to evict them.
- Bar landlords from disclosing a tenant's immigration status.
- Allow tenants to sue landlords who disclose their immigration status to law enforcement.
- Prohibit questions about a tenant's immigration status during a trial.
- Prohibit attorneys from reporting or threatening to report the immigration status of people involved in housing cases.

The City also supported AB-686 Housing discrimination: affirmatively further fair housing AB-686 would require public agencies to administer housing and community development programs and activities in a manner to affirmatively further fair housing, and to not take any action that

³¹⁸ Denoting or relating to a person whose sense of personal identity and gender corresponds with their birth sex

³¹⁹ https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB291

is inconsistent with this obligation. Failure to meet this standard would be a discriminatory act under the California Fair Employment and Housing Act. The bill would define the term “public agency” to mean any state or local agency, regional transportation agency, or council of governments.

4.7 Ensure the Coordinated Entry System matches people with physical disabilities with designated accessible housing units

People with physical disabilities must be given priority for City-assisted dwelling units that have features designed for people with those disabilities. For example, a unit that meets the requirements of the Uniform Federal Accessibility Standards for a mobility- or sensory-impaired person should be given to a qualified individual with a disability-related need for those accessibility features. HCIDLA, HACLA, United Way, and LAHSA (the local CES provider) will ensure that the Coordinated Entry System (CES) is designed to allow for this prioritization, including by tracking whether people on the CES list need mobility- or sensory-accessible units and prioritizing those people for accessible units.

4.8 Ensure people with disabilities who cannot provide detailed personal/medical information still have access to the Coordinated Entry System

The CES is the primary means for homeless persons to be placed into immediate shelter and longer-term housing. However, the CES protocol calls the person to provide for detailed personal information and that often presenting a barrier for people with disabilities who are currently and/or chronically homeless and must access CES to obtain immediate shelter and be placed in longer term housing. Generally, applicants are expected to answer extensive questions about their personal history, including physical and mental health, and other extremely intimate details of their lives. Moreover, the applicant must consent for their responses to be shared within the system. Furthermore, people with certain psychiatric disabilities or who have experienced past violations of trust by relatives or authority figures may simply not be willing or able, due to their disability or their past experience, to share such information. HCIDLA, HACLA, LAHSA and United Way will work together to remove these barriers to people with disabilities. They will train CES workers in disability competence and ensure that there is a clear reasonable accommodation process to ensure people with disabilities have equal access and opportunity to enter the CES.

GOAL 5: EXPAND ACCESS TO OPPORTUNITY FOR PROTECTED CLASSES

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
5.1	High	Implement Equitable Transit-Oriented Development utilizing Measure JJJ and TOC	Disparities in Access to Opportunity	Location and Type of Affordable Housing	Increase percentage of units within TOD projects that are affordable, increase depth of affordability of affordable TOD units, 1-5 Years	HCIDLA, DCP
5.2	High	Maximize and secure fair share of funding from the State of California's Cap & Trade Program (Greenhouse Gas Reduction Fund), to improve housing opportunities, increase economic investments and address environmental factors in disadvantaged communities	Disparities in Access to Opportunity; R/ECAPs; Segregation	Location and Type of Affordable Housing; Location of Environmental Health Hazards; Quality of Affordable Housing Information Programs; Source of Income Discrimination, Displacement of residents due to economic pressures	Number of applications submitted for funding for the Affordable Housing & Sustainable Communities (AHSC) program, annually, 1-5 Years; Inclusion of affordable housing, anti-displacement and sustainable components in City submitted Transformative Climate Communities (TCC) funding program.	HCIDLA, DOT, LA METRO, BOE, DCP and other key City Departments, Mayor, City Council, Environmental Justice organizations

5.3	High	Encourage mobility among residents living in subsidized housing in areas of poverty, particularly in R/ECAPs	Disparities in Access to Opportunity; R/ECAPs; Segregation	Location and Type of Affordable Housing	Explore the incorporation of mobility counseling into annual recertification for all participants in HACLA's housing programs and City funded subsidized housing programs, Year 1; Evaluate housing mobility counseling program annually, Years 1-5	HACLA and LAHSA
5.4	High	Enhance the City's partnership with LA Metro and further the implementation of the City's MOU with LA Metro to expand the development and preservation of affordable housing and related programs as prioritized by the LA Metro Board	Disparities in Access to Opportunity; R/ECAPs; Segregation	Location and Type of Affordable Housing; Quality of Affordable Housing Information Programs; Source of Income Discrimination	Convene appropriate parties from HCIDLA and LA METRO to identify at least one LA Metro-owned property eligible for potential development of affordable housing, 1-2 years	LA METRO, City
5.5	High	Partner with LAUSD to expand access to proficient schools through housing and community development programs and activities	Disparities in Access to Opportunity; R/ECAPs; Segregation	Location and Type of Affordable Housing; Quality of Affordable Housing Information Programs; Source of Income Discrimination	Convene appropriate parties from HCIDLA and LAUSD to identify at least one LAUSD owned property near a proficient elementary school eligible for potential development of affordable housing, 1-2 Years	LAUSD, City
5.6	Medium	Adopt the Clean Up Green Up (CUGU) ordinance's regulations on new or expanding industrial operations and other increased land use protections to diminish the	Disparities in Access to Opportunity; R/ECAPs; Segregation	Location and Type of Affordable Housing; Location of Environmental Health Hazards; Quality of	Implement ordinance, thereafter implement the provisions therein three pilot "green zones" in Pacoima/Sun Valley,	City, Environmental Justice Organizations

		public health threats of subject uses in close proximity to publicly habitable space		Affordable Housing Information Programs; Displacement of Residents Due to Economic Pressures	Wilmington, and Boyle Heights, 1 -5 years	
5.7	Medium	Partner with LAPD to evaluate the feasibility and efficacy of creating a dedicated Hate Crimes Investigative Division	Disparities in Access to Opportunity	Public and Private Discrimination; Displacement of and/or lack of housing support for victims of domestic violence	Create a 5-person ad hoc committee made up of representatives from LAPD, HCIDLA, HACLA, Transgender Advisory Council and Housing Rights Center (HRC), Year 1; Prepare and publish report with findings of feasibility and efficacy study, Year 2	City, HACLA, LAPD, Transgender Advisory Council, HRC
5.8	Medium	Implement developer incentives to promote increased local hiring preferences for residential and nonresidential projects as outlined in Measure JJJ and, potentially, the Linkage Fee	Disparities in Access to Opportunity	Location and Type of Affordable Housing; Location of Employers	Report, annually, on compliance with local hiring preferences, 1-5 Years	HCIDLA, Economic Workforce Development Department (EWDD)
5.9	Medium	Target workforce development resources in R/ECAPs to improve economic mobility	Disparities in Access to Opportunity; R/ECAPs	Lack of private investment in specific neighborhoods; Lack of public investment in specific neighborhoods, including services or amenities; Location of employers; The availability, type, frequency, and	Coordinate with the Workforce Innovation and Opportunity Act Board to target workforce development resources, expand Section 3 hiring opportunities, 1-3 Years	EWDD, HCIDLA, HACLA

				reliability of public transportation		
5.10	Medium	Explore the feasibility of additional educational resources for public housing residents to improve educational outcomes including Saturday and Summer programs	Disparities in Access to Opportunity	Lack of public investment in specific neighborhoods, including services or amenities	Develop partnerships with organizations that promote and develop youth services highlighting educational advancement and leadership. (Measured by expansion of programs to PH sites and residents served); Partner with the Los Angeles Area Chamber of Commerce for the Cash for College Initiative to provide college prep technical assistance to students and families, continue to pursue grants that promote educational success and college access.	City, HACLA, LAUSD
5.11	Medium	Enhance partnerships that improve environmental and health outcomes for low-income and public housing residents	Disparities in Access to Opportunity; R/ECAPs; Segregation	Location and Type of Affordable Housing; Location of Environmental Health Hazards	Evaluate the impact of redevelopment at Jordan Downs on its residents, Years 1-10 Achieve a reduction of units who report a household member who smokes from established baseline and increase positive health outcomes and healthy living practices	HACLA, HCIDLA, and County Health Department and community health-based organizations

					Decrease factors associated with childhood asthma, Year 1	
5.12	Medium	Partner with Los Angeles County to further explore ways to expand access to quality affordable housing through housing and community development programs and activities	Disparities in Access to Opportunity; R/ECAPs; Segregation	Location and Type of Affordable Housing; Quality of Affordable Housing Information Programs; Source of Income Discrimination	Convene appropriate parties from HCIDLA and LA County to identify at least one LA County owned property for potential development of affordable housing, 1-2 years	LA County, City

Discussion

Background

Employment

Using HUD provided data through the AFFH tool, the Labor Market Index analyzes the extent of engagement in the labor market and overall human capital in a neighborhood.³²⁰ The Labor Market Index examines the level of employment, participation in the labor force, and educational attainment in a census tract, evaluating the unemployment rate and percent of adults age 25 or older with a bachelor's degree or higher. The values range from 0 – 100 and the higher the score, the higher the labor force participation and human capital in a neighborhood.

Within the region, the City of Los Angeles has the lowest neighborhood-level scores for labor market participation and human capital. Parts of the San Fernando Valley and West LA boast higher scores in the Labor Market Index. Further examination of the distribution of race and ethnicity and national origin demographics shows that areas with low labor market access also have a high concentration of racial and ethnic minority groups. Examining unemployment for the region using labor statistics, the City has a slightly higher unemployment rate of 4.4% compared to the region unemployment.

³²⁰ Human Capital: “the skills the labor force possesses and is regarded as a resource or asset”.

Handbook on Cliometrics: Human Capital, February 2014 http://scholar.harvard.edu/files/goldin/files/human_capital_handbook_of_cliometrics_0.pdf.

Environment

The majority of the City of Los Angeles has poor quality environmental health access, with the exception of West LA and portions of the Valley area where scores are moderate rather than low. The HUD-provided data shows that areas within R/ECAPs have some of the worst Environmental Health Index scores. HUD's Environmental Health Index measures exposure based on the Environmental Protection Agency's (EPA) estimates of air quality and carcinogenic, respiratory, and neurological toxins by neighborhood. The Index measures risk across broad geographic areas with values ranging from 0 – 100. Higher index values are associated with less exposure to toxins and reflect better environmental quality in neighborhoods. Residents of the R/ECAPs within the Harbor area of the City along with R/ECAPs in Southeast LA have some of the lowest access to environmentally healthy neighborhoods. In addition, according to the California Environmental Protection Agency's CalEnviro Screen 3.0 tool, the City of Los Angeles has 62% of all the Disadvantaged Communities in Los Angeles County. Disadvantaged Communities are communities designated by CalEPA pursuant to Senate Bill 535 using the CalEnviro 3.0 tool. This tool identifies communities in California most burdened by pollution from multiple sources and most vulnerable to its effect, considering socioeconomic factors and underlying health status. Disadvantaged communities are identified by census tract and are those that score at or above the 75th percentile.

Low-Poverty Neighborhoods

Access to low-poverty neighborhoods is an integral aspect of opportunity. Studies have demonstrated the link between living in (or moving to) low-poverty neighborhoods and higher earnings as an adult, higher college attendance, and reduced out-of-wedlock births.³²¹ Likewise, living in areas with high concentrations of poverty can contribute to the “perpetuation of poverty and the production of neighborhoods with high levels of crime and violence and low levels of high-school completion, marriage, and labor force attachment.”³²²

Visualized through the HUD data, the Low Poverty Index (the Index), measures the poverty rate in each neighborhood.³²³ A higher value on the Index is associated with a higher probability that a household is likely to live in a low poverty neighborhood. The core area of the City that encompasses Central, South and East Los Angeles score low on the Index and show high-poverty neighborhoods. Often, these same areas within the City including, West Adams, Mid-City, Westlake, Pico Union, Boyle Heights, Lincoln Heights, South Central, Vernon, and Watts, have a higher proportion of Hispanics and Blacks compared to other parts of the City. This same area also has a higher proportion of individuals with physical, auditory and cognitive disability. Most of the City's R/ECAPs are in areas that perform poorly on the Index.

³²¹ The Effects of Neighborhoods on Intergenerational Mobility I: Childhood Exposure Effects (with Nathaniel Hendren), National Bureau of Economic Research Working Paper No. 23001, Revised Version (May 2017)

³²² Jargowsky, Paul. “Concentration of Poverty in the New Millennium: Changes in Prevalence, Composition, and Location of High Poverty Neighborhoods.” (2013). The Century Foundation and Rutgers Center for Urban Research. Referencing William Julius Wilson's findings from “The Truly Disadvantaged” (1987).

³²³ Specifically, the uses both family poverty rates and public assistance receipt, in the form of cash-welfare, such as Temporary Assistance for Needy Families (TANF). <https://data.world/hud/low-poverty-index>

Transportation

Using HUD-provided data and specifically looking at demographics and transit trips, it is apparent that Downtown LA and the southern part of Central LA boast the City's highest Transit Trips Index scores with access to public transportation, including access to Metro stations, multiple rail lines, and stops for both bus and Bus Rapid Transit (BRT) lines. There are up to 20 R/ECAPs concentrated in this same area. This network of public transportation offers critical connections between East and Central LA and the Valley and Harbor areas. Additionally, the Metro Expo line also provides connections to West LA. The Transit Trips Index reflects estimates from the Location Affordability Index of transit trips by a three-person single parent family with income at 50% median income for renters for the region. Values in the Transit Trip Index are ranked with values ranging from 0 – 100 and the higher value is associated with residents within a census tract that utilize public transportation and have better access to transit.

During the Transportation and Jobs Focus Group Meeting, stakeholders provided feedback on several issues pertaining to transportation. The first issue raised was the hours of operation for public transit and the lack of available public transportation to serve individuals working graveyard shifts. Without access to reliable transportation during shift hours early in the morning or late at night, it is difficult to secure employment that requires commuting. The lack of available transportation disparately limits access to employment for all protected classes who are disproportionately reliant on the public transportation system in LA. Specifically, this limits access to employment centers and other community amenities outside of the central core of the city. South and East LA also have high concentrations of publicly supported housing, which has a high representation of racial and ethnic minorities.

The distribution of individuals with disabilities by age indicates significant concentrations of persons with disabilities in areas with concentrations of R/ECAPs in South LA, East LA and further north in the San Fernando Valley area. For individuals with disabilities, using public transportation can involve a time-consuming network of lines and transfers that is challenging to navigate and especially burdensome for individuals with mobility limitations. With multiple transfer points, it is critical that the transit user is on time, and missing one bus can easily result in a significant delay. Bus Rapid Transit such as the Orange Line in the San Fernando Valley can be transformative for transit dependent individuals. The Orange Line has arrival times that are accurate to within two to three minutes and operates on a dedicated busway with limited competing traffic, thus allowing commuters to consistently plan travel times. According to a study completed by Southern California Public Radio, KPCC, the Orange Line arrived late at stops just 5.4% of the time, unlike the majority of the bus lines in the system.

Education

Using HUD provided data through the AFFH tool, it is evident that children residing in large portions of the City of Los Angeles have low access to proficient schools. Values in the HUD School Proficiency Index are ranked from 0 to 100 with higher scores indicating higher quality schools in a neighborhood. Census tracts near and around R/ECAPs have particularly low access to proficient schools. Neighborhoods in East LA, Central LA, and South LA have the least access to proficient schools. Moving further south into the Harbor section of the City, levels of access begin to improve. However, the Valley area of the City encompassing North, South and West Valley has the greatest access to proficient schools. This signals a correlation between patterns of segregation and integration and access to quality schools.

Overlaying racial and ethnic demographics over school proficiency levels further demonstrates disparities in accessing proficient schools based on residency patterns and proximity to proficient schools.

Strategies

5.1 Implement Equitable Transit Oriented Development utilizing Measure JJJ and TOC

Transit Oriented Development is happening in Los Angeles. The City seeks to ensure that any plans that are developed and implemented also focus on equitability. In addition to Measure JJJ's Transit Oriented Communities Affordable Housing Overlay, the City seeks to apply similar affordability requirements to Transit Neighborhood Plans. The Mayor's Sustainable City pLAN calls for 275,000 new homes by 2035, with 65% of them (178,750) within 1,500 feet of transit. Applying the Measure JJJ TOC Overlay affordable housing ratios more broadly could create up to 44,688 affordable homes.

With the passage of Measure M, the sales tax increase to expand transit in LA, it is critical to ensure that housing is at the center of the planning process for expansion project. Most important is to ensure the local hiring provision outlined in the recently approved Measure M guideline is implemented to increase employment and job training opportunities to protected classes. Considerations for affordable housing preservation and developing additional affordable units near transit will help ensure that low income households currently living near transit stations are not displaced. Early data analysis demonstrates that recent changes to public transportation routes and schedules reduced efficiency of some of the primary bus lines servicing major corridors. Bus ridership declined by 8.9% while subway and light rail increased by 4.4%; which is largely attributed to the Gold Line and Expo Line extensions.

5.2 Maximize and secure a fair share of funding from the State of California's Cap & Trade Program (Greenhouse Gas Reduction Fund), to improve housing opportunities, economic investments and address environmental factors in disadvantaged communities

The California Greenhouse Gas Reduction Fund contributes funding for place-based strategies to improve environmental health, access to affordable housing in location-efficient areas, and economic investment in disadvantaged communities. However, the program is nascent and overall results on the impact of these funds in disadvantaged areas is incomplete. Billions in loan and grant funding will be made available to the State's Disadvantaged Communities through the various California Greenhouse Gas Reduction Fund programs including the Affordable Housing and Sustainable Communities (AHSC) and the Transformative Climate Communities (TCC) programs over the next 14 years. The City will enhance its current work on these two funding programs and improve its coordination work in maximizing and leveraging other Cap and Trade funds to ensure a fair share of funds for the City of Los Angeles. This is particularly important as the City has over 60% of the total Disadvantaged Communities (DACs) census tracts in the Los Angeles County Region. The State legislature overwhelmingly supported legislature enacted by the Governor to extend the Cap & Trade program through 2030 in July 2017.

5.3 Encourage mobility among residents living in subsidized housing in areas of poverty, particularly in R/ECAPs

Even after obtaining a HCV, many people throughout the City are unable to find housing because landlords choose not to participate in the HCV program. This reality, in combination with time limits imposed on voucher holders for finding and securing housing, may result in the return of the housing voucher despite the voucher holder's need for affordable housing. Regions across the country are adopting the use of housing mobility counselors to assist people-- especially seniors and people with disabilities-- in locating units for which their vouchers will be accepted, and in advising them about the mobility benefits of obtaining housing in higher opportunity neighborhoods.³²⁴ First-time voucher holders and tenants looking to move or "port" their vouchers benefit from housing mobility counseling. Through the Affordable Housing Trust Fund the City may be able to prioritize HCV holders in project wait lists.

5.4 Enhance the City's partnership with LA Metro and furthering the implementation of the City's MOU with LA Metro to expand the development and preservation of affordable housing and related programs as prioritized by the LA Metro Board

The HCIDLA successfully executed the County's first Joint Development Agreement MOU between Metro and the City of Los Angeles in 2016. The MOU outlines the coordination, negotiation, and collective responsibilities between the two agencies to preserve and create covenant-controlled income-restricted, subsidized housing for residents earning at or below 60% of the area median income within a half mile of a fixed guideway bus or rail station. Enhancing and furthering the implementation of the MOU between the City and LA METRO will continue to create opportunities to connect housing to other opportunities including transportation, employment and education. LA Metro-owned properties present the opportunity to develop affordable housing to help stabilize families and increase their access to opportunity.

5.5 Partner with LAUSD to explore ways to expand access to proficient schools through housing and community development programs and activities

By partnering with LAUSD, HCIDLA and HACLA can help address challenges outside school such as housing instability and access to high performing schools. HCIDLA and HACLA, in their roles as developers and landlords, creates opportunities to connect housing and education. LAUSD owned property near high performing schools can be an opportunity to develop affordable housing. This in turn can potentially stabilize families and help to ensure greater academic success for children leading to economic success.

³²⁴ <http://www.housingmobility.org/>

5.6 Adopt the Clean Up Green Up (CUGU) ordinance's regulations on new or expanding industrial operations and other increased land use protections to diminish the public health threats of subject uses in close proximity to publicly habitable space

In April 13, 2016, the City of Los Angeles adopted the Clean Up Green Up Ordinance. This ordinance amended Sections 12.04, 12.20, 12.24 and 12.32 of Article 2 of Chapter 1 of the Los Angeles Municipal Code, and Sections 13.03, 13.18 and 13.19 of Article 3 of Chapter 1 of the Los Angeles Municipal Code in order to authorize the establishment of a Clean Up Green Up Supplemental Use District within Boyle Heights, Pacoima/Sun Valley, and Wilmington to reduce cumulative health impacts resulting from incompatible land uses, establish a citywide Conditional Use for asphalt manufacturing and refinery facilities, and increase the notification requirement for projects within a surface mining district. The neighborhoods of Boyle Heights, Pacoima/Sun Valley, and Wilmington are within R/ECAPs.

The City will work with environmental justice organizations to implement the ordinance's regulations on new or expanding industrial operations and other increased land use protections to diminish the public health threats of subject uses which are near publicly habitable space. These provisions of the ordinance will be carried out in the three pilot "green zones" located in Pacoima, Wilmington, and Boyle Heights. The five year goal is to improve the environmental health of these neighborhoods that largely consists of low-income families impacted by poor air quality, which have serious long term emotional, physical, and mental health effects on members of these communities.

5.7 Partner with LAPD to evaluate the feasibility and efficacy of creating a dedicated Hate Crimes Investigative Division

In 2016, LAPD adopted the Hate Crime Supplemental Report, Form 03.01.05, to document investigations of hate crimes or hatred incident investigations. LAPD developed the Hate Crime Supplemental Report in partnership with the City of LA Human Relations Commission's Transgender Working Group (TWG), the Mayor's Office, and with advocates and representatives of the transgender, gender non-conforming and non-binary persons' community.

Hate crimes against the transgender, gender non-conforming, and non-binary persons' community are both the most prevalent hate crimes committed in Los Angeles and also the fastest rising target of reported hate crimes.¹¹ From January 1, 2017 through June 30, 2017, the City has seen a 900% increase in reported hate crimes against members of the transgender, gender non-conforming and non-binary persons' community over the same period in 2016.¹²

Currently, LAPD operates seven divisions under the Detective Bureau that investigates topic specific crimes. Hate Crimes fall under the Detective Support and Vice Division (DSVD) which is responsible for investigating missing persons, hate crimes, threats made to public officials/prominent

persons, aggravated stalking, piracy and counterfeit sales/goods, animal cruelty, pimping/pandering, pornography, and prostitution/human trafficking.³²⁵

HCIDLA and HACLA will work with LAPD to create a 5-person ad hoc committee made up of representatives from LAPD, HCIDLA, HACLA, Transgender Advisory Council and Housing Rights Center (HRC) in Year 1, and, will prepare and publish a report with findings of feasibility and efficacy study in Year 2.

5.8 Implement developer incentives to promote increased local hiring preferences on all housing projects

Local hire policies can be effective strategies to expose disadvantaged communities to good paying jobs, but the programs need to target those with the greatest need. Consistent with much of the rest of the United States, the benefits of economic investment in Los Angeles rarely find its way to those that need it most. Lack of economic benefit combined with increasing housing cost burden exacerbates inequality. As more private and public investment finds its way into Los Angeles, the City is committed to promoting local hiring preferences.³²⁶ For example, the City has already adopted Measure JJJ which sets affordable housing mandates and hiring restrictions favoring local laborers working on residential projects requiring a zoning change or an amendment to the City's General Plan. An effective strategy to prevent displacement of existing low-income residents when new investment is directed to their neighborhoods is to use the new development as an opportunity for residents to gain employment and therefore improve their ability to afford housing. The City has already adopted Measure JJJ which sets affordable housing mandates and hiring restrictions favoring local laborers working on residential projects requiring a zoning change or an amendment to the City's General Plan. This approach can be expanded to pursue local hiring policies for all new development projects (i.e. commercial) along with investment in local workforce development programs to ensure a pipeline of skilled workers for the newly-created jobs.

5.9 Target workforce development resources in R/ECAPs to improve economic mobility

The Housing Authority of the City of Los Angeles (HACLA) Housing Services Department has the Workforce Development Unit which operates employment preparation, training and placement services in the City and County of Los Angeles serving all residents at HACLA as well as vulnerable populations in LA County which includes Compton, CA. The Watts Los Angeles WorkSource Center is a core component of this Unit with separate funding from the City of Los Angeles' Economic Workforce Development Department (EWDD) which administers the Workforce Innovation and Opportunity Act (WIOA) funds. This unit also administers the City's Hire LA's Youth program and other grants from LA County.

HACLA is the only public housing agency in the nation that operates an on-site WorkSource Center. HACLA's Watts/Los Angeles WorkSource Center, is a full-service center and it is one of sixteen (16) centers and 3 portal offices across the City to be awarded with federal funds. It serves

³²⁵ Official Site of The LOS ANGELES POLICE DEPARTMENT, http://www.lapdonline.org/DETECTIVE_BUREAU/CONTENT_BASIC_VIEW/6261, accessed October 09, 2017

³²⁶ Making a Success of Local Hire, <https://shelterforce.org/2016/10/21/making-a-success-of-local-hire-work/>

over 1,600 public housing residents and other residents of the community annually and has placed nearly 15,000 residents in sustainable employment opportunities. At most public housing developments, HACLA operates Employment Technology Centers (ETCs) or Computer Labs. These ETCs offer tutoring for youth and job skills training, including computer classes for adults. The ETCs are points of entry for HACLA residents to receive services offered by the WorkSource Center expanding our reach by co-locating services in various geographical areas of the City.

HACLA had expanded its Section 3 hiring requirements beyond the imposition of Section 3 to non-federally funded contracts, and, when employment is not feasible, works with vendors to develop other economic opportunities for residents such as training and mentoring programs. Section 3 outreach and education to vendors is provided at pre-bid conferences and business events, through the development of supporting materials and communications, ensuring that Section 3 obligations are clearly spelled-out in all solicitations and monitoring contractual compliance with Section 3 commitments.

5.10 Explore the feasibility of additional educational resources for public housing residents to improve educational outcomes including Saturday and Summer programs

Schools often struggle to better meet the needs of low-income students and to connect them to resources that can stabilize their lives and strengthen their academic competencies. By partnering with schools and school districts, housing providers can help address challenges outside school that can become barriers to learning. Their roles as developers and landlords create opportunities to connect housing and education. As developers, housing authorities can build or repurpose facilities and bring education supports closer to assisted housing developments.³²⁷

HACLA has no means to fund this type of initiative, however, HACLA will continue to take advantage of grant opportunities as available to help achieve this strategy. HACLA will continue to expand partnerships with organizations like the Boys and Girls Club, Soledad Enrichment Action, El Proyecto Pastoral and College Track, the LA Chamber of Commerce and Community Colleges which provide support services in educational advancement and college preparation. HACLA has recently been awarded a two-year HUD grant for project SOAR. The ROSS for Education program (also known as Project SOAR (Students + Opportunities + Achievements = Results) is a new demonstration program reflecting HUD's commitment to expand educational services to youth living in HUD-assisted housing. Research shows there are large gaps in college attendance by family income that are not driven by level of preparation. A key barrier to college attendance is that low-income youth are least likely to complete the Free Application for Federal Student Aid (FAFSA) even though they are most in need of financial aid.

The HUD ROSS for Education program provides grant funding to public housing authorities to deploy education navigators to provide individualized assistance to public housing youth between the ages of 15-20 and their families in FAFSA completion, financial literacy and college readiness, post-secondary program applications and post-acceptance assistance. HACLA is committed to continuing public-private partnerships in this area.

³²⁷ Developing Housing and Education Partnerships, <https://www.urban.org/sites/default/files/publication/49021/2000181-Developing-Housing-and-Education-Partnerships.pdf>

5.11 Enhance partnerships that improve environmental and health outcomes for low-income and public housing residents

HACLA engages in toxic remediating measures for any of its redevelopment projects. The majority of HACLA's public housing sites are over fifty years old and were constructed in neighborhoods adjacent to industrial corridors or in communities where zoning conflicts and historic land uses have created negative environmental impacts to entire neighborhoods. HACLA has undergone modernization projects under HUD's guidance during the 1990's and early 2000's and remediated much of the lead-based paint and asbestos flooring, which was common in buildings of this era. It is very difficult to fully remediate these toxins and HACLA follows strict State and Federal requirements for abatement whenever undertaking substantial rehabilitation of its properties or when opportunities present themselves during unit turnover. When undertaking a new construction, HACLA believes in holistically addressing environmental impacts. This includes conducting Phase I studies on its properties and Phase II, as necessary, prior to initiating any substantial construction project. Any contaminants found are remediated under the direction of appropriate state or local agencies and follow up testing is done to ensure all remediation standards are met or exceeded. New soil, landscaping and building materials are utilized to reduce environmental impacts of new development with the goal of creating net zero developments, greening areas to combat carbon emissions and increasing security and mobility opportunities to encourage walking, biking and public transit.

5.12 Partner with Los Angeles County to further explore ways to expand access to quality affordable housing through housing and community development programs and activities

By partnering with LA County, HCIDLA and HACLA can help address challenges such as housing instability. HCIDLA and HACLA, in their roles as either developers (HCIDLA) and landlords (HACLA), creates opportunities to connect housing to other opportunity including transportation, employment and education. LA County owns property that can be an opportunity to develop affordable housing that stabilizes families and increases their access to opportunity.

GOAL 6: INCREASE COMMUNITY INTEGRATION FOR PERSONS WITH DISABILITIES.

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
6.1	High	Require at least 10% of total units in all multi-family developments receiving public funds or funded with multifamily mortgage revenue bonds to be accessible to persons with mobility disabilities and at least 4% of total units to be accessible for persons with hearing and/or vision disabilities	Segregation/Integration, Disparities in Access to Opportunity	Lack of affordable, integrated housing for individuals with mobility and/or hearing/vision disabilities who need supportive services	At least 10% of total new construction units for persons with mobility disabilities and at least 4% of total units for persons with hearing/vision disabilities by development	HCIDLA, HACLA
6.2	High	Require at least 10% and no more than 25% of units in all special needs developments or permanent supportive housing developments receiving public funds to be set aside for persons with disabilities, including individuals transitioning from institutional settings and individuals who are at risk of institutionalization	Segregation/Integration	Lack of affordable, integrated housing for individuals with mobility and/or hearing/vision disabilities who need supportive services	Number of accessible mobility and hearing/vision units up to a total of 20% in each housing development, 1-2 Years.	HCIDLA, HACLA
6.3	High	Provide equal accessibility design training for housing developers, architects, and contractors as well as fair housing training for housing developers and property managers who receive public funds	Disparities in Access to Opportunity, Segregation/Integration, Disproportionate Housing Needs	Lack of affordable, accessible housing in a range of unit sizes	Increased compliance by housing developers, architects, property managers and contractors with ADA and Fair Housing Act (reasonable accommodations and modifications) requirements, 1-2 years	HCIDLA

Goal	Priority	Strategy	Fair Housing Issues	Contributing Factors	Metrics, Milestones, Timeframe for Achievement	Responsible Program Participant(s)
6.4	Medium	Increase access to integrated employment for persons with intellectual and developmental disabilities by partnering with the regional centers to connect individuals to job opportunities with public entities	Segregation/Integration, Disparities in Access to Opportunity	Inaccessible government facilities or services	Formalization of partnerships between City, such as EWDD and HACLA and the regional centers, establishment of hiring goals for public agencies; 1-3 Years	City of Los Angeles Personnel Department, HACLA, EWDD, Workforce Development Board
6.5	Medium	Provide training to service providers on adapting their models to meet the needs of individuals with disabilities in scattered sites	Segregation/Integration	Lack of affordable in-home or community based services	Number of trainings conducted, number of service providers supporting individuals in integrated settings, 1-3 Years	Department on Disability, HCIDLA, other Departments as applicable and ILC's.

Discussion

Background

On January 13, 2012, the Independent Living Center of Southern California (ILCSC), Fair Housing Council of San Fernando Valley (FHCSFV), and Communities Actively Living Independent and Free (CALIF) filed a lawsuit against the City alleging that the City and the Community Redevelopment Agency of Los Angeles (CRA/LA) failed to ensure that housing developments funded, developed, or significantly assisted by the City or the CRA/LA had the required number of Accessible Units for people with Mobility and Hearing/Vision disabilities and were made available to people with disabilities, and further failed to operate other aspects of the City's housing program in compliance with Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, the Fair Housing Act, and California state law. See *Independent Living Center of Southern California, et al. vs. City of Los Angeles*, Case No. 2:12-cv-00551-SJO (PJW) (C.D. Cal.). On August 30, 2016, the Los Angeles City Council agreed to settle litigation, and the settlement was approved by the court on or about September 5, 2016. The settlement provides that, over the next 10 years, the City will ensure that at least 4,000 of its affordable housing units meet architectural accessibility standards under Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, and California Government Code Section 11135.

To implement the Agreement, the City will also:

- Ensure that all future construction of multi-family housing units overseen by the City fully comply with Section 504 of the Rehabilitation Act, the ADA, the federal Fair Housing Amendments Act, and the California Building Code, and when those requirements conflict, comply with those requirements that provide the greatest accessibility;
- Ensure that non-discriminatory rental occupancy policies are adopted and implemented by Owners and Property Management Agents for covered housing developments;
- Redesign the City’s rental housing website, www.housing.lacity.org, to provide an Accessible Housing Registry that lists all accessible units and their features and allows individuals with disabilities the opportunity to be notified of vacant units and apply for the units online or through a call center;
- Provide effective communications for applicants, tenants, and the public that includes large print and Braille documents, auxiliary aids and services, hearing devices, and other services to ensure that communications with applicants and tenants with disabilities are as effective as communications with people without disabilities;
- Train City staff, owners, and their property managers on federal and state laws relating to nondiscrimination regarding people with disabilities;
- Respond to concerns and resolve grievances by people with disabilities in a timely manner; and
- Provide detailed semi-annual reports to the Plaintiffs and City management regarding all the activities undertaken to carry out these requirements.

Strategies

6.1 Require at least 10% of total units in all multi-family developments receiving public funds or funded with multifamily mortgage revenue bonds to be accessible to persons with mobility disabilities and at least 4% of total units to be accessible for persons with hearing and/or vision disabilities

There is a significant need for additional affordable housing that is accessible to persons with disabilities in LA. 206,091 City residents have ambulatory or mobility disabilities while 88,327 have hearing disabilities and 74,408 have vision disabilities. These categories are not mutually exclusive, and some persons with disabilities have multiple disabilities. Although not all persons with disabilities in LA are low-income, a disproportionate percentage are low-income and in need of affordable housing. In the City of LA, there are roughly 90,000 units, many of them not affordable that are subject to the Fair Housing Act’s design and construction standards as well as about 40,000 publicly supported units. Under Section 504 of the Rehabilitation Act, 5% of units in publicly supported developments must be accessible to persons with mobility disabilities, and 2% must be accessible to persons with hearing and vision disabilities. This strategy proposes to expand upon the base provided by Section 504 to strengthen accessibility requirements, both regarding the percentage of accessible units required and the range of funding streams to which accessibility requirements apply. There is a compelling need to take this step-in light of the significant gap between the number of persons with disabilities who need affordable accessible units and the actual supply. The City is also required to take the steps contemplated by this strategy as a result of the settlement agreement in *Independent Living Center of Southern California, et al. vs. City of Los Angeles*.

6.2 Require at least 10% and no more than 25% of units in all special needs developments or permanent supportive housing developments receiving public funds to be set aside for persons with disabilities, including individuals transitioning from institutional settings and individuals who are at risk of institutionalization.

Although the City of Los Angeles and the State of California have made great strides in reducing the number of persons with disabilities who reside in segregated settings, the shift away from large institutional settings like Developmental Centers and State Hospitals has not resulted in full community integration in all cases. All too often, persons with disabilities who are at the greatest risk of institutionalization, including persons with psychiatric disabilities and persons with intellectual and developmental disabilities, have been subject to homelessness or residence in segregated congregate settings like nursing homes, intermediate care facilities, board and care homes, and large group homes. Where there has been the development of permanent supportive housing, some of those buildings consist entirely of special needs units rather than containing a mix of units for individuals with and without disabilities. There has been a national shift in the dominant approach to providing permanent supportive housing that is best captured by the changes that Congress made to the Section 811 program when it passed the Frank Melville Supportive Housing Investment Act in 2010. That statute prohibits developments that receive Section 811 Project Rental Assistance funds from setting aside more than 25% of units for persons with disabilities. By not allowing a higher set-aside, the program increases the likelihood that residents with disabilities will have opportunities for meaningful interactions with people without disabilities. Setting the low end of the set-aside range at 10% effectively balances the need to ensure community integration and prevent segregation with the need to ensure that development activity results in the production of a significant number of units.

6.3 Provide accessibility design training for housing developers, architects, and contractors as well as fair housing training for housing developers and property managers who receive public funds.

To ensure the success of efforts to increase the supply of affordable, accessible housing through the implementation of the settlement agreement in *Independent Living Center of Southern California, et al. vs. City of Los Angeles*, it is necessary to provide training and education for the wide range of stakeholders who are involved in the production and ongoing maintenance of properties that are subject to the agreement. As discussed above, there is a glaring shortfall of affordable, accessible units in LA. It will always be more efficient to invest in ensuring accessibility before there is the potential for noncompliance instead of waiting until after a property is constructed when the retrofit process is much costlier.

6.4 Increase access to integrated employment for persons with intellectual and developmental disabilities by partnering with the regional centers to connect individuals to job opportunities with public entities.

Data from the regional centers paints a stark picture of the extremely limited access that persons with intellectual and developmental disabilities have to employment, in general, and to jobs paying above minimum wage, in particular, in LA. The American Community Survey confirms that labor force participation is low and unemployment is high among persons with disabilities, regardless of the type of disability. City entities such as

the Economic & Workforce Development Department, the Personnel Department, and the Workforce Development Board, along with HACLA, can play a role in increasing access to employment for persons with disabilities by collaborating with the regional centers on the placement of individuals with intellectual and developmental disabilities in jobs that they can perform with the appropriate services and supports, which may be funded by Medi-Cal. Over the longer term, agencies should set hiring goals for the employment of persons with intellectual and developmental disabilities. If the City and HACLA are active partners in increasing paid employment for persons with disabilities, in addition to reducing disparities in access to opportunity, they may be able to realize greater cost efficiencies in the provision of publicly supported housing for persons with disabilities. With increasing income levels, the tenant's share of rent for Housing Choice Voucher holders and others with deep subsidies will increase, thus allowing more households to benefit from publicly supported housing.

6.5 Provide training to service providers on adapting their models to meet the needs of individuals with disabilities in scattered sites.

As the City and HACLA prioritize the development of publicly supported housing that is available to persons with disabilities in scattered sites where no more than 25% of units are set aside for persons with disabilities, Medi-Cal-funded services providers that are accustomed to serving individuals in group homes or in 100% special needs multi-family properties will need to adapt their delivery models. Challenges such as increased travel times between consumers and ensuring safety without a 24-hour live-in aide are real, but they are also obstacles that forward-thinking service providers across the country have effectively surmounted through the innovative use of technology and other changes. Some of the service providers that specialize in serving individuals with disabilities, including persons with intensive and complex needs, in integrated, scattered site settings also offer technical assistance and training. By contracting with an experienced service provider that has successfully overcome the barriers that local service providers are likely to face to provide training, the City and HACLA can ensure that the process of transitioning to a more integrated model of permanent supportive housing is as smooth as possible.