APPENDIX E: FAIR HOUSING ASSESSMENT

I. OVERVIEW OF AB 686

In 2017, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH) into California state law. AB 686 defined "affirmatively further fair housing" to mean "taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity" for persons of color, persons with disabilities, and other protected classes. The Bill added an assessment of fair housing to the Housing Element, which includes the following components:

- A summary of fair housing issues and assessment of the jurisdiction's fair housing enforcement and outreach capacity;

- An analysis of segregation patterns, concentrations of poverty, disparities in access to opportunities, and disproportionate housing needs;

- An assessment of contributing factors; and

- An identification of fair housing goals and actions.

The AFFH rule was originally a federal requirement applicable to entitlement jurisdictions (with population over 50,000) or participating jurisdictions (population under 50,000) through a county program to receive HUD Community Planning and Development (CPD) funds from HUD. Before the 2016 federal rule was repealed in 2019, jurisdictions receiving CPD funds were required to prepare an Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI). AB 686 states that jurisdictions can incorporate findings from either report into the Housing Element.

This analysis relies on the following data sources: California Department of Housing and Community Development (HCD) 2021 Affirmatively Furthering Fair Housing (AFFH) Data Viewer, 2018 Los Angeles County Analysis of Impediments to Fair Housing Choice (2020 AI), U.S. Department of Housing and Urban Development (HUD) 2021 AFFH Data, 2015-2019 American Community Survey (ACS) (5-Year Estimates), and HUD Comprehensive Housing Affordability Strategy (CHAS) Data based on the 2013-2017 ACS, among others.

For the purpose of HUD CPD funds (CDBG, HOME, and ESG)[20], the Los Angeles County Development Authority (LACDA) functions as the lead agency to receive these funds on behalf of 48 small cities (with population less than 50,000), including Culver City, and the unincorporated County areas. Collectively, this geography is known as the Urban County. Much of the data provided by HUD for AFFH analysis is based on this collective Urban County geography.

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[20] *Community Development Block Grants (CDBG); HOME investment Partnership (HOME); and Emergency Solutions Grants (ESG).*

II.   ASSESSMENT OF FAIR HOUSING ISSUES

1.   FAIR HOUSING ENFORCEMENT AND OUTREACH

The Los Angeles County CDBG Urban County program contracts with the Housing Rights Center (HRC) for fair housing services. HRC contract does not include providing fair housing records for individual jurisdictions participating in the Urban County program.

In FY 2019-2020, HRC received 2,038 calls for general housing inquiries and 356 calls related to fair housing inquiries. Among the 356 inquires, fair housing issues relating to disabilities (physical and mental) represented the majority (82%) of the protected classifications. Trailing distantly behind was source of income at 5% of the inquiries.

During FY 2019-2020, 83 housing discrimination cases were opened, the majority were reconciled or withdrawn. Two cases were referred to litigation and three cases were referred to the Department of Fair Employment and Housing (DFEH). Among the 83 cases opened, physical disability (47%), mental disability (22%), and source of income (19%) represented the majority of the protected classes.

Annually, HRC conducts outreach and education throughout the Los Angeles Urban County. Typical activities include Public Service Announcements/media/advertisements; community presentations; literature distribution; and management trainings.

For federally funded Urban County programs, the County has committed to complying with the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq., by ensuring that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status (having children under age 18), or sex. LACDA prohibits discrimination in any aspect of housing on the basis of race, color, religion, national origin, disability, familial status, or sex. Furthermore, HRC under contract with LACDA, monitors fair housing compliance for both state and federal fair housing laws.

Figure E-1 shows public housing buildings, HUD Office of Fair Housing and Equal Opportunity inquiries (FHEO), and housing choice vouchers (HCV) for Culver City and the surrounding areas. There are no public housing buildings in Culver City. Between January 2013 and March 2021, HUD received 26 FHEO inquiries from Culver City residents; four related to disability, one related to race, three related to familial status, two related to sex, and 16 general inquiries. Less than 5% of renters in three Culver City tracts are receiving Housing Choice Vouchers (HCVs). To protect the confidentiality of those receiving HCV Program assistance, tracts containing 10 or fewer voucher holders have been omitted from this data set.

FIGURE E-1: PUBLIC HOUSING BUILDING, FHEO INQUIRIES, AND HCVS
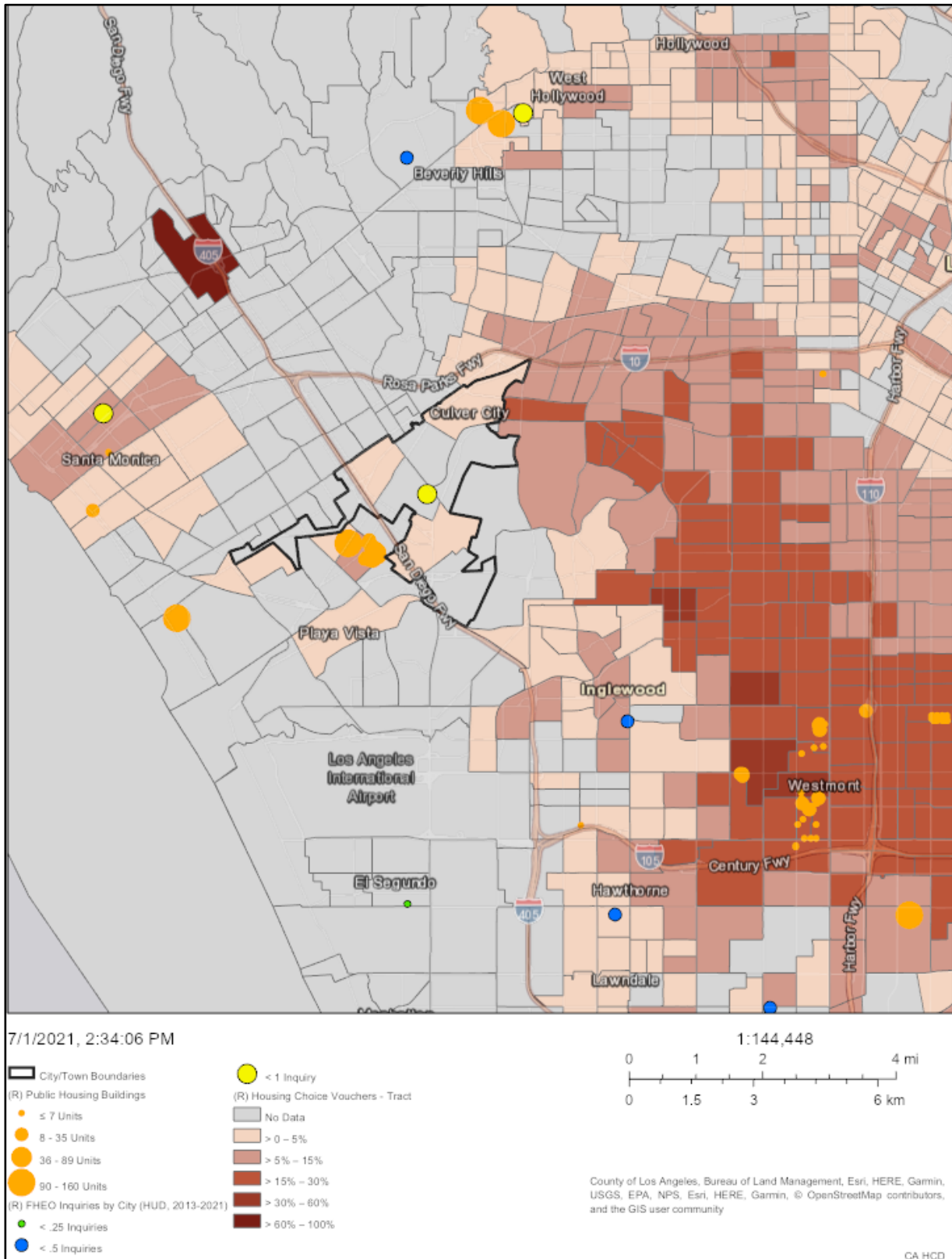
Source: HCD AFFH Data Viewer (HUD 2020 Public Housing Program data, HUD FHEO 2013-2021 data, HUD 2020 HCV data), 2021.

2.   INTEGRATION AND SEGREGATION

RACE AND ETHNICITY 002

HUD tracks racial or ethnic dissimilarity[21] trends for Urban County programs. Dissimilarity indices show the extent of distribution between two groups, in this case racial/ethnic groups, across census tracts. The following shows how HUD views various levels of the index:

- <40: Low Segregation

- 40-54: Moderate Segregation

- >55: High Segregation

The indices for the Los Angeles Urban County and Los Angeles County region from 1990 to 2020 are shown in Table E-1. Dissimilarity between non-White and White communities in the Los Angeles Urban County and throughout the Los Angeles County region has worsened since 1990. For both Los Angeles Urban County jurisdictions and the entire County, dissimilarity between Black and White communities has improved slightly, while dissimilarity between Hispanic/White and Asian or Pacific Islander/White communities has worsened. Based on HUD's index, segregation between Asian or Pacific Islander/White in the Los Angeles Urban County communities is moderate, while segregation between non-White/White, Black/White, and Hispanic/White Los Angeles Urban County communities is high.

TABLE E-1: RACIAL/ETHNIC DISSIMILARITY TRENDS 001

Racial/Ethnic Group	1990	2000	2010	2020
Los Angeles Urban County (Including Culver City)				
Non-White/White	53.33	53.62	53.85	55.87
Black/White	68.29	63.51	60.24	64.21
Hispanic/White	62.81	64.99	64.38	65.12
Asian or Pacific Islander/White	41.58	48.57	49.62	52.79
Los Angeles County				
Non-White/White	55.32	55.5	54.64	56.94
Black/White	72.75	68.12	65.22	68.85
Hispanic/White	60.12	62.44	62.15	63.49
Asian or Pacific Islander/White	43.46	46.02	45.77	49.78

Source: HUD AFFH Data, 2020.

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility. According to the 2015-2019 ACS, approximately 54% of the Culver City population belongs to a racial or ethnic minority group. In comparison, racial/ethnic minorities make up 74% of the population countywide.

Figure E-2 compares the racial/ethnic minority population in Culver City between 2010 and 2018. The racial/ethnic minority population in most block groups has increased since 2010. Block groups with the highest percent of racial/ethnic minorities (between 60 and 80%) are located along the western and northeastern City boundaries, and in

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[21] *Index of dissimilarity is a demographic measure of the evenness with which two groups are distributed across a geographic area. It is the most commonly used and accepted method of measuring segregation.*

#001

Posted by **JIll Vesci** on **07/30/2021** at **11:30am** [Comment ID: 3474] - Link
Type: Missing
Agree: 1, Disagree: 0
This is county level data. Culver City specific data on dissimilarity needs to be presented and compared to the county as a whole. City specific data would be needed to prepare city specific policy responses and to measure the the racial/ethnic distributions in the city

#002

Posted by **JIll Vesci** on **07/30/2021** at **11:34am** [Comment ID: 3476] - Link
Type: Missing
Agree: 0, Disagree: 0
please quantify how racial and ethnic segregation in culver city varies from racial and ethnic segregation in Los Angeles county as whole

block groups in the southern section of the City. Racial/ethnic minorities make up between 40 and 60% in a majority of the City.
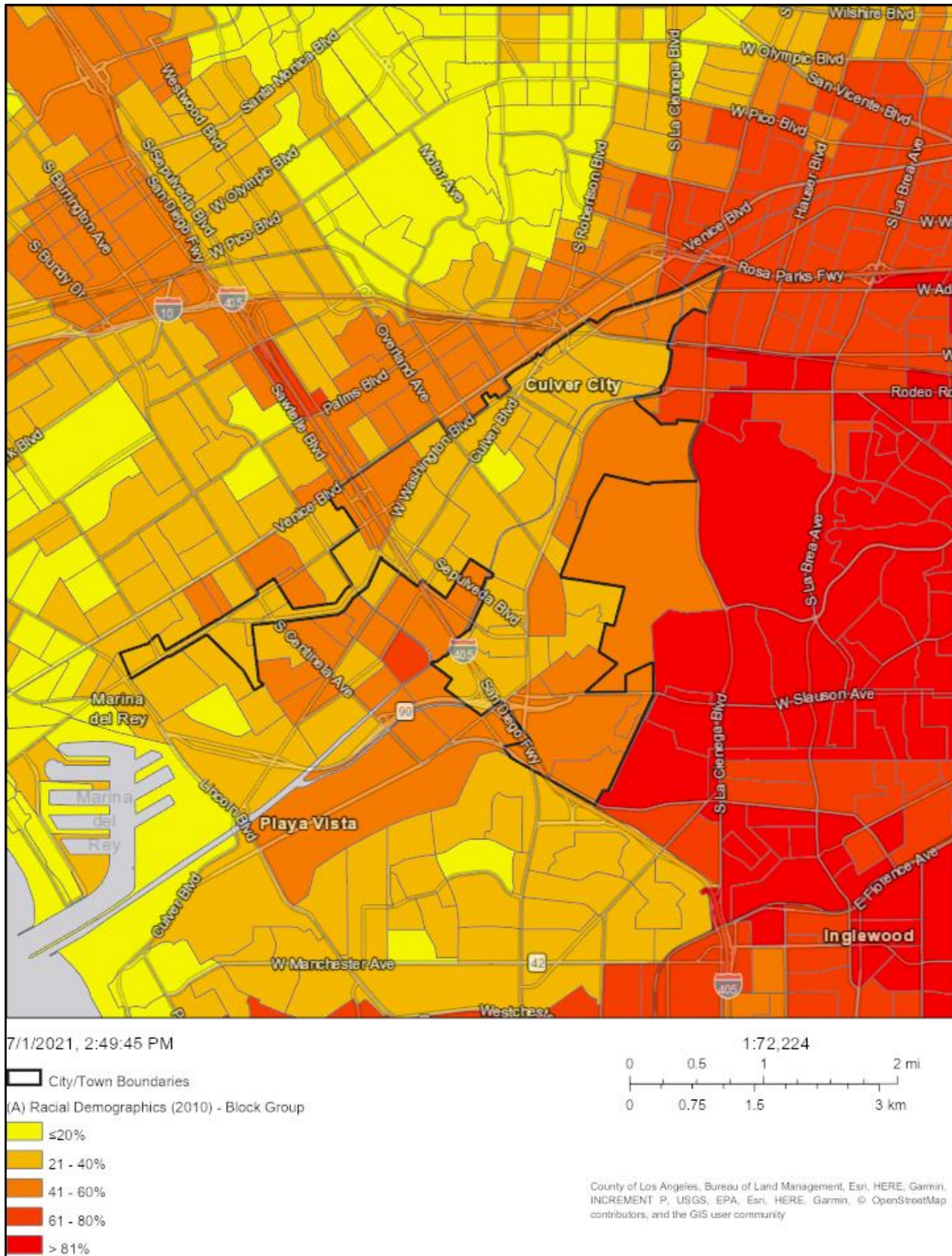
Figure E-2(B)also shows the sites inventory used to meet the City's 2021-2029 Regional Housing Needs Assessment (RHNA). RHNA sites are generally evenly distributed throughout Culver City. However, a larger proportion of lower income RHNA units are in block groups with higher concentrations of racial/ethnic minorities compared to moderate and above moderate income units (Table E-2). Most very low and low income RHNA units are in block groups where racial/ethnic minorities make up between 61% and 80% of the population. Approximately 71.9% of moderate income units and 84.1% of above moderate income units are located in 41% to 60% racially/ethnically minority concentrated block groups. The majority (65.5%) of all RHNA units are in block groups where 41-60% of the population belongs to a racial or ethnic minority group, while 31.9% of all RHNA units are in block groups where 61-80% of the population belongs to a racial/ethnic minority group.

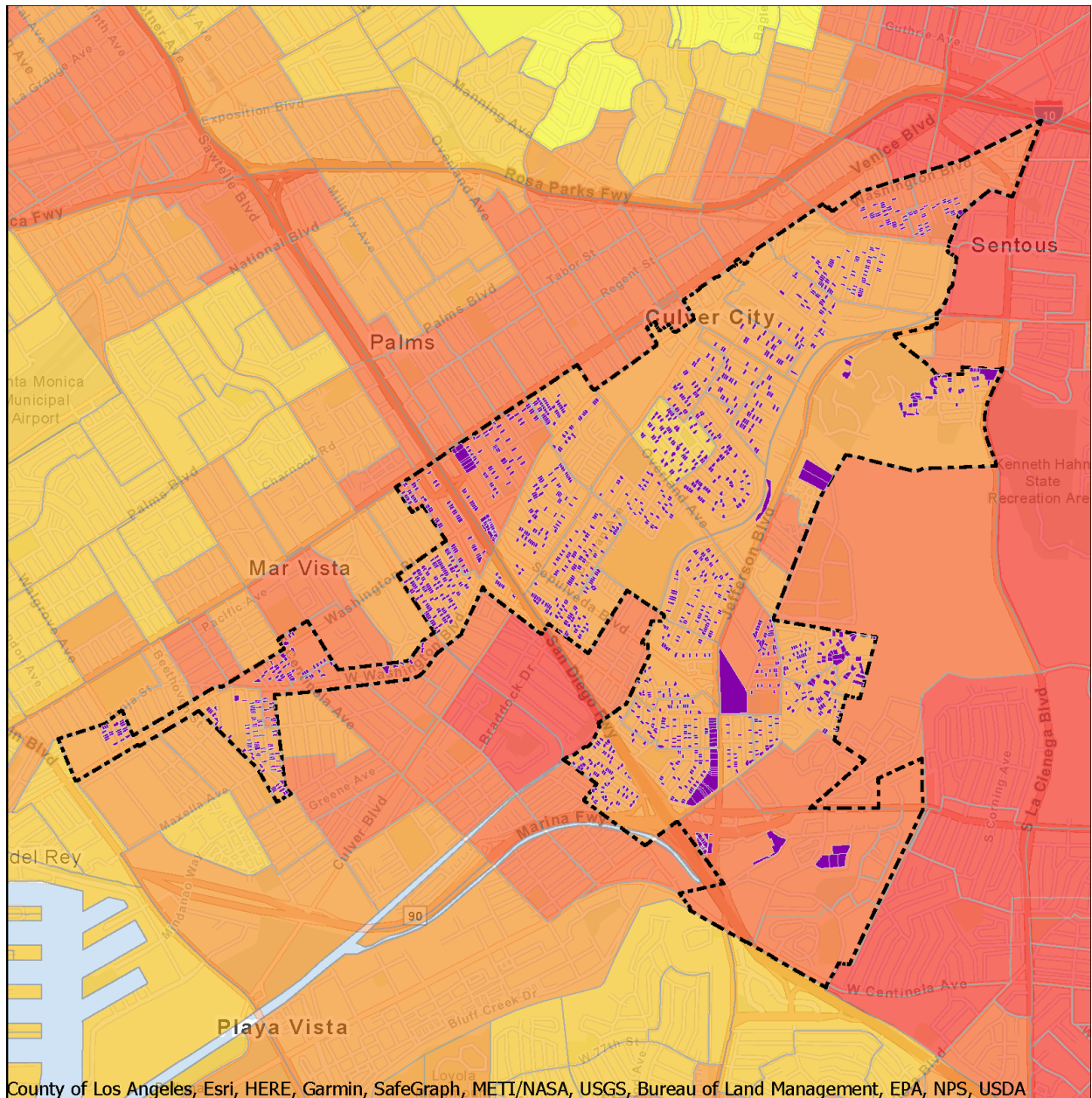TABLE E-2: BREAKDOWN OF RHNA UNITS BY RACIAL/ETHNIC MINORITY CONCENTRATION

Racial/Ethnic Minority Concentration (Block Group)	Very Low Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units	All RHNA Units
21-40%	0.0%	0.0%	3.3%	4.0%	2.6%
41-60%	33.9%	33.5%	71.9%	84.1%	65.5%
61-80%	66.1%	66.5%	24.8%	11.9%	31.9%
Total	1,100	1,136	1,927	3,156	7,319

Note: The RHNA sites in this analysis include 1,410 Incremental Infill parcels that met the objective criteria for site selection.

FIGURE E-2: (A) RACIAL/ETHNIC MINORITY CONCENTRATIONS (2010)

7/1/2021, 2:49:45 PM   1:72,224

City/Town Boundaries

(A) Racial Demographics (2010) - Block Group

≤20%

21 - 40%

41 - 60%

61 - 80%

> 81%

County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

(B) RACIAL/ETHNIC MINORITY CONCENTRATIONS AND SITES INVENTORY (2018)
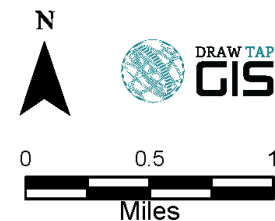

**Culver City Housing Element Sites Inventory
with Minority Concentrated Areas of Population**

Racial Demographics 2018 (Block Group)

Percent of Total Non-White Population

- ≤ 20%
- 21 - 40%
- 41 - 60%
- 61 - 80%
- > 81%
- Sites Inventory
- City Boundary

Data Provided By:
California Department of Housing and Community Development
Affirmatively Furthering Fair Housing Data and Mapping Resources
https://affh-data-resources-cahcd.hub.arcgis.com

Source: HCD AFFH Data Viewer (Esri 2010, 2018), 2021.

DISABILITY

According to the 2015-2019 ACS, approximately 9.3% of Culver City residents experience a disability, compared to 9.9% countywide. Since the 2008-2012 ACS, the disabled population in Culver City and the county has increased from 8% and 9.3%, respectively.

Figure E-3 compares the disability population over time using the 2010-2014 and 2015-2019 ACS. The concentration of persons with disabilities has increased in tracts in the northeastern and southern sections of the City. In three tracts, the 10 to 20% of the population are persons with disabilities. In the remainder of the City, less than 10% of the population experiences a disability. Tracts with larger populations of persons with disabilities are not generally concentrated in one area of Culver City.

Figure E-3(B) also shows the distribution of RHNA sites along with the current disability concentration by census tract. Some of the larger sites used to meet the City's 2021-2029 RHNA are in tracts in the southern areas of the City, where the persons with disabilities make up more than 10% of the total tract population. As presented in Table E-3, approximately 37.6% of all RHNA units are in tracts where less than 10% of the population experiences a disability, and 62.4% of units are in tracts where 10-20% of the population experiences a disability. In general, a slightly larger proportion of lower income RHNA units are in tracts with a larger population of persons with disabilities. Approximately 65.5% of very low income units and 65.6% of low income units are in tracts with a disabled population exceeding 10%, compared to 62.1% of moderate income units, and 60.5% of above moderate income units.

TABLE E-3: BREAKDOWN OF RHNA UNITS BY DISABLED POPULATION

Disabled Population (Tract)	Very Low Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units	All RHNA Units
<10%	34.5%	34.4%	37.9%	39.5%	37.6%
10-20%	65.5%	65.6%	62.1%	60.5%	62.4%
Total	1,100	1,136	1,927	3,156	7,319

Note: The RHNA sites in this analysis include 1,410 Incremental Infill parcels that met the objective criteria for site selection.

FAMILIAL STATUS

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the martial status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. Approximately 26.6% of Culver City households have one or more child under the age of 18. The City's share of households with children is smaller than the county (33%) and the neighboring cities of Inglewood (35.1%), and the City of Los Angeles (29.3%), but larger than Beverly Hills (25.1%), but is larger than Santa Monica (17.8%) and West Hollywood (4.3%).

Single parent households are also protected by fair housing law. Only 4.9% of households in the City are single-parent households compared to only 9% countywide. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Approximately 3.4% of households in Culver City are single female-headed households with children, fewer compared to the county (6.4%).

As shown in Figure E-4, over 60% of children in all Culver City tracts live in married couple households. In the northern and southern areas of the City, over 80% of children live in married couple households. Figure E-5 shows the percentage of Children in female-headed households. In two tracts, 20-40% of children live in female-headed households. Fewer than 20% of children in the remainder of the City live in female-headed households.

Figure E-4 and Figure E-5 also show the sites inventory used to meet the City's 2021-2019 RHNA. As discussed above, Culver City is partially comprised of tracts where 60-80% of children live in married couple households and tracts where

#003

Posted by **Jlll Vesci** on **07/30/2021** at **11:53am** [Comment ID: 3478] - Link
Type: Question
Agree: 0, Disagree: 0
Is this significantly different than the county as a whole?

over 80% of children live in married couple households. Approximately 55.5% of all RHNA units are in tracts where 60-80% of children live in married couple households, and 44.5% of units are in tracts where over 80% of children live in married couple households (Table E-4). A larger proportion of lower income units are in tracts with a higher concentration of children in married couple households. Approximately 58.5% of very low income units and 60.6% of low income units are in tracts where over 80% of children are in married couple households, compared to only 44.6% of moderate income units and 33.8% of above moderate income units. As shown in Table E-5, majority of very low (96.4%), low (98.2%), and moderate income units (86.4%) are in tracts where fewer than 20% of children live in single-parent female-headed households. A larger proportion of above moderate income units (23.1%) are in tracts with a higher concentration of children female-headed households

TABLE E-4: BREAKDOWN OF RHNA UNITS BY PERCENT OF CHILDREN IN MARRIED COUPLE HOUSEHOLDS

| Percent of Children in Married Couple Households (Tract)	Very Low Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units	All RHNA Units
60-80%	41.5%	39.4%	55.4%	66.2%	55.5%
>80%	58.5%	60.6%	44.6%	33.8%	44.5%
Total	1,100	1,136	1,927	3,156	7,319

Note: The RHNA sites in this analysis include 1,410 Incremental Infill parcels that met the objective criteria for site selection.

## TABLE E-5: BREAKDOWN OF RHNA UNITS BY PERCENT OF CHILDREN IN FEMALE-HEADED HOUSEHOLDS

Percent of Children in Female-Headed Households (Tract)	Very Low Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units	All RHNA Units
<20%	96.4%	98.2%	86.4%	76.9%	85.6%
20-40%	3.6%	1.8%	13.6%	23.1%	14.4%
Total	1,100	1,136	1,927	3,156	7,319

Note: The RHNA sites in this analysis include 1,410 Incremental Infill parcels that met the objective criteria for site selection.

FIGURE E-3: (A) CONCENTRATION OF PERSONS WITH DISABILITIES (2010-2014)
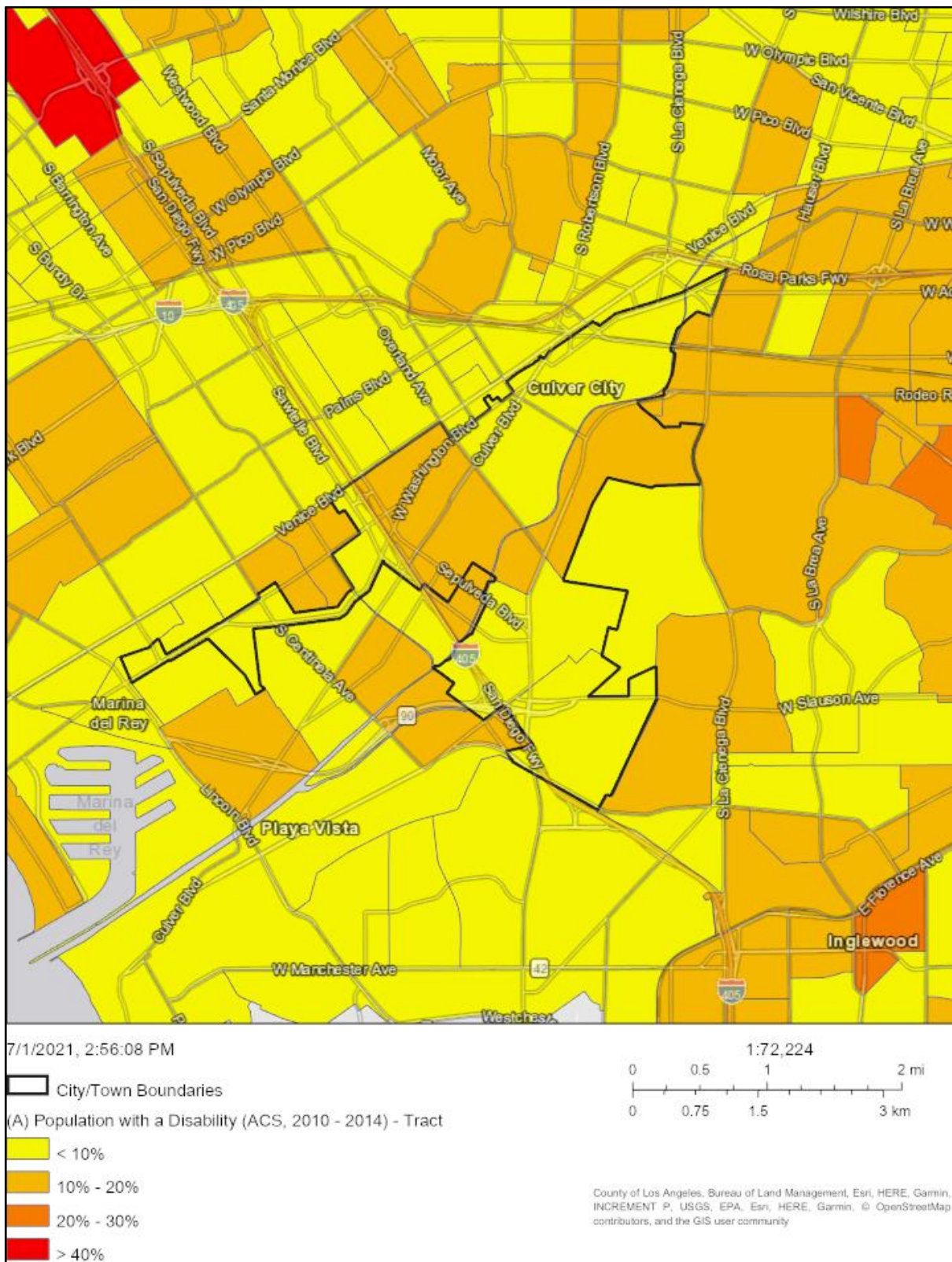
(B) CONCENTRATION OF PERSONS WITH DISABILITIES AND SITES INVENTORY (2015-2019)
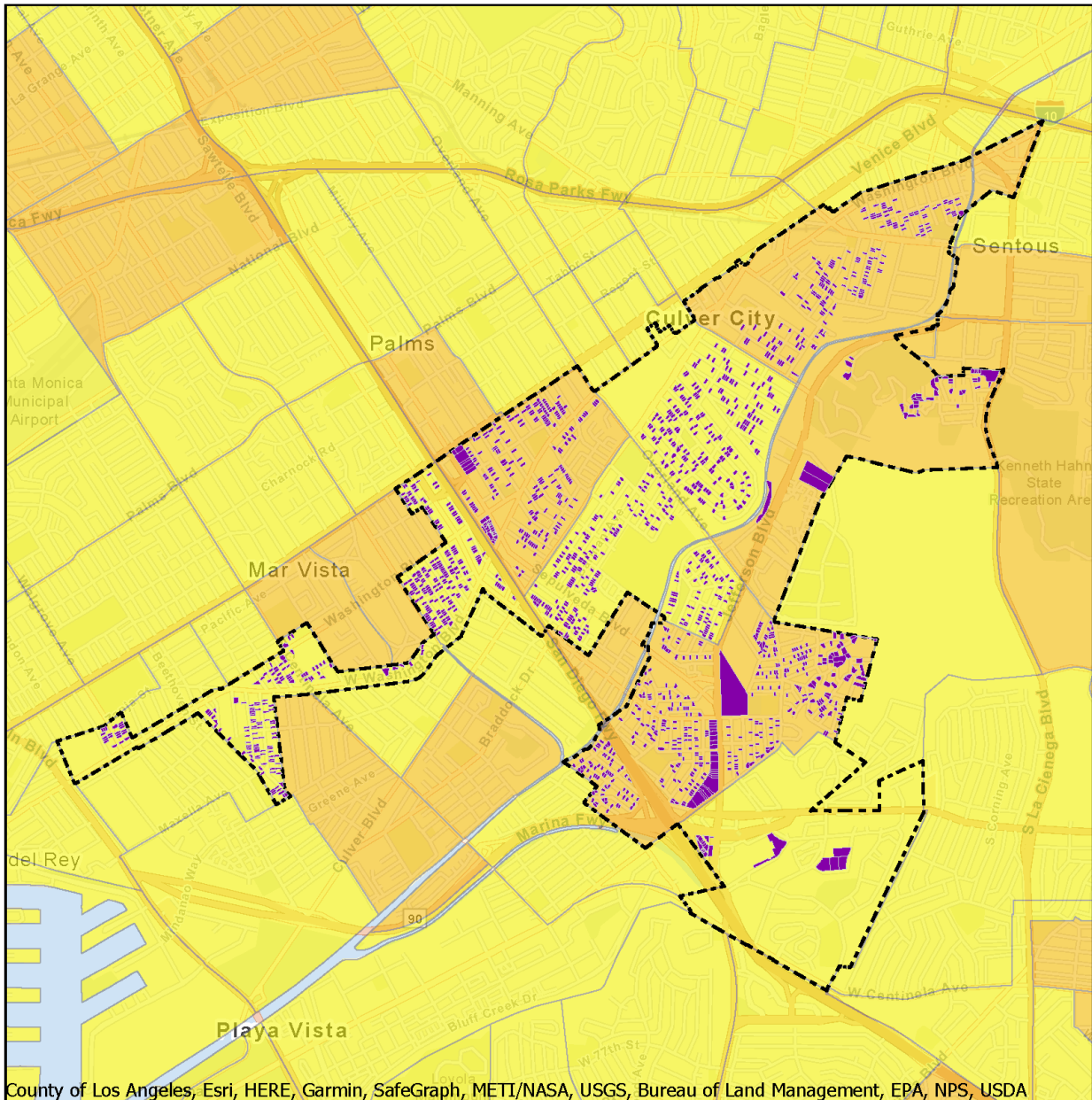
**Culver City Housing Element Sites Inventory
with Disability Concentrated Areas of Population**
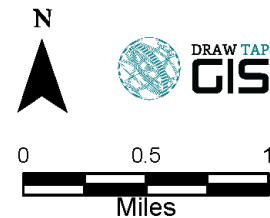
Population with a Disability (Tract) - ACS (2015-2019)

B18101_calc_pctDE

- < 10%
- 10% - 20%
- 20% - 30%
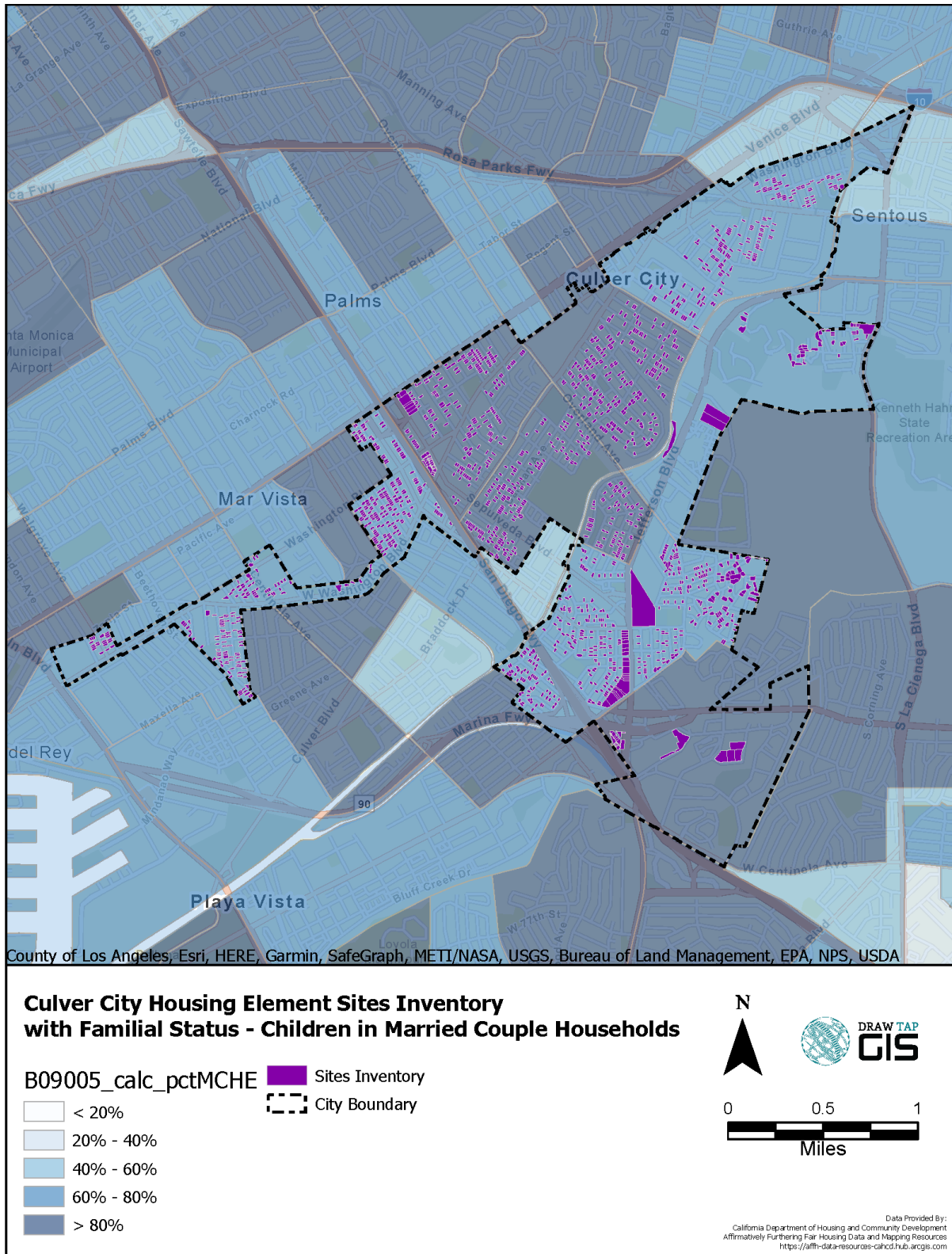- 30% - 40%
- > 40%
- Sites Inventory
- City Boundary

Data Provided By:
California Department of Housing and Community Development
Affirmatively Furthering Fair Housing Data and Mapping Resources
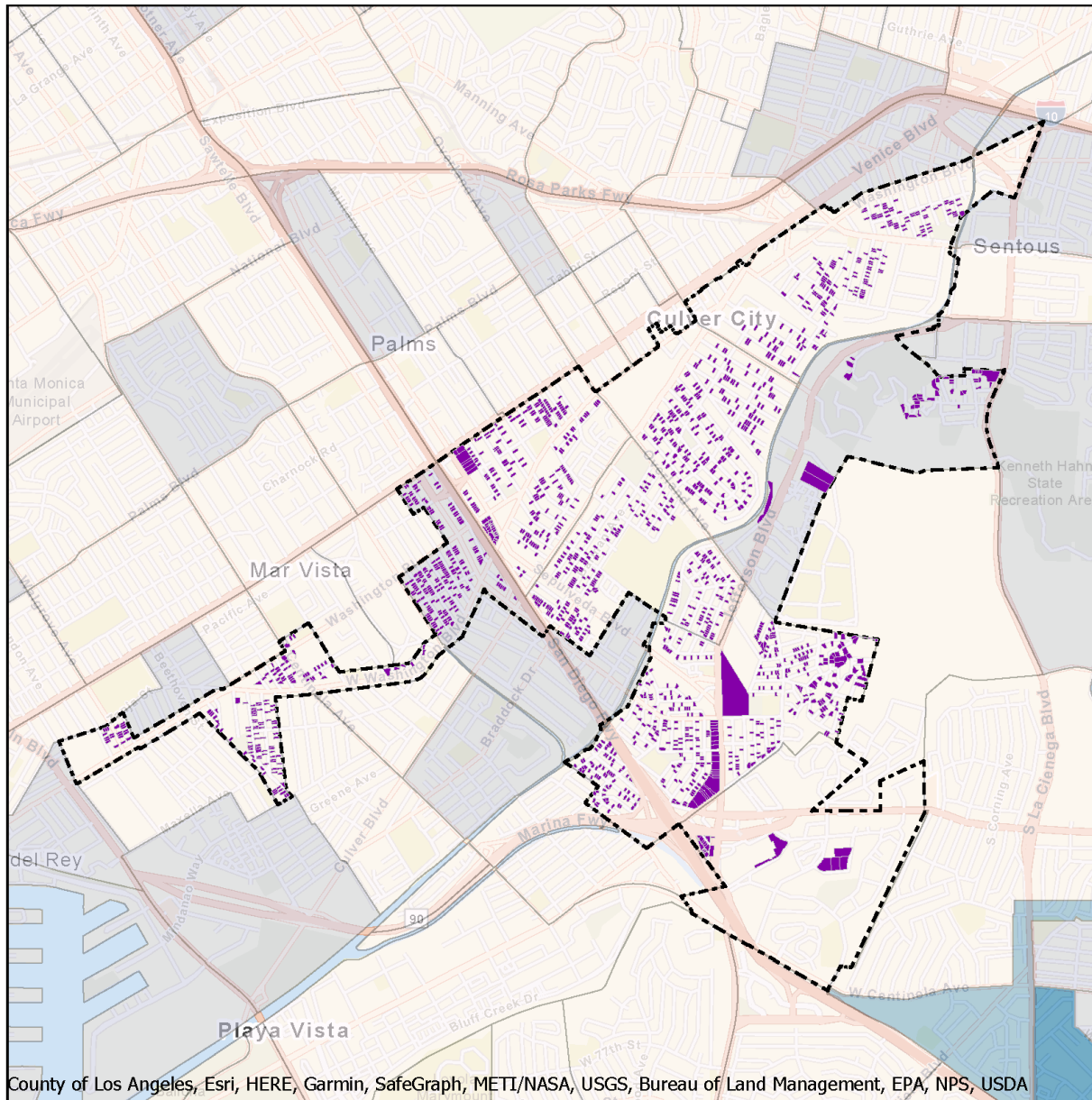https://affh-data-resources-cahcd.hub.arcgis.com

Source: HCD AFFH Data Viewer (2010-2014 and 2015-2019 ACS), 2021.

FIGURE E-4: PERCENT OF CHILDREN IN MARRIED COUPLE HOUSEHOLDS AND SITES INVENTORY (2015-2019)

Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

FIGURE E-5: PERCENT OF CHILDREN IN FEMALE-HEADED HOUSEHOLDS AND SITES INVENTORY (2015-2019)

Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

I N C O M E

Identifying low- or moderate-income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD's 2013-2017 CHAS data (Table E-6) shows that 32.4% of Culver City households earn 80 percent or less than the county area median income (AMI) and are considered lower income, a smaller share than the county (51.6%). According to the 2015-2019 ACS, the median household income in Culver City is $95,044, higher than $68,044 in the County.

TABLE E-6: INCOME DISTRIBUTION

Income Category	Culver City		Los Angeles County	
	Households	Percent	Households	Percent
<30% AMI	1,940	11.7%	641,055	19.5%
31-50% AMI	1,375	8.3%	482,070	14.6%
51-80% AMI	2,040	12.3%	578,285	17.5%
81-100% AMI	1,575	9.5%	312,595	9.5%
>100% AMI	9,615	58.1%	1,281,195	38.9%
Total	16,545	100.0%	3,295,200	100.0%

Source: HUD CHAS Data (based on the 2013-2017 ACS, 2020.

Figure E-6 shows the Lower and Moderate Income (LMI) areas in the City by census tract. HUD defines a LMI area as a census tract or block group where over 51 percent of the population is LMI. There are no block groups in Culver City with LMI populations exceeding 75%. The western side of the City has higher concentrations of LMI households making up 50 to 75% of the population. Most of the City is made up of block groups where the LMI population is less than 50%.
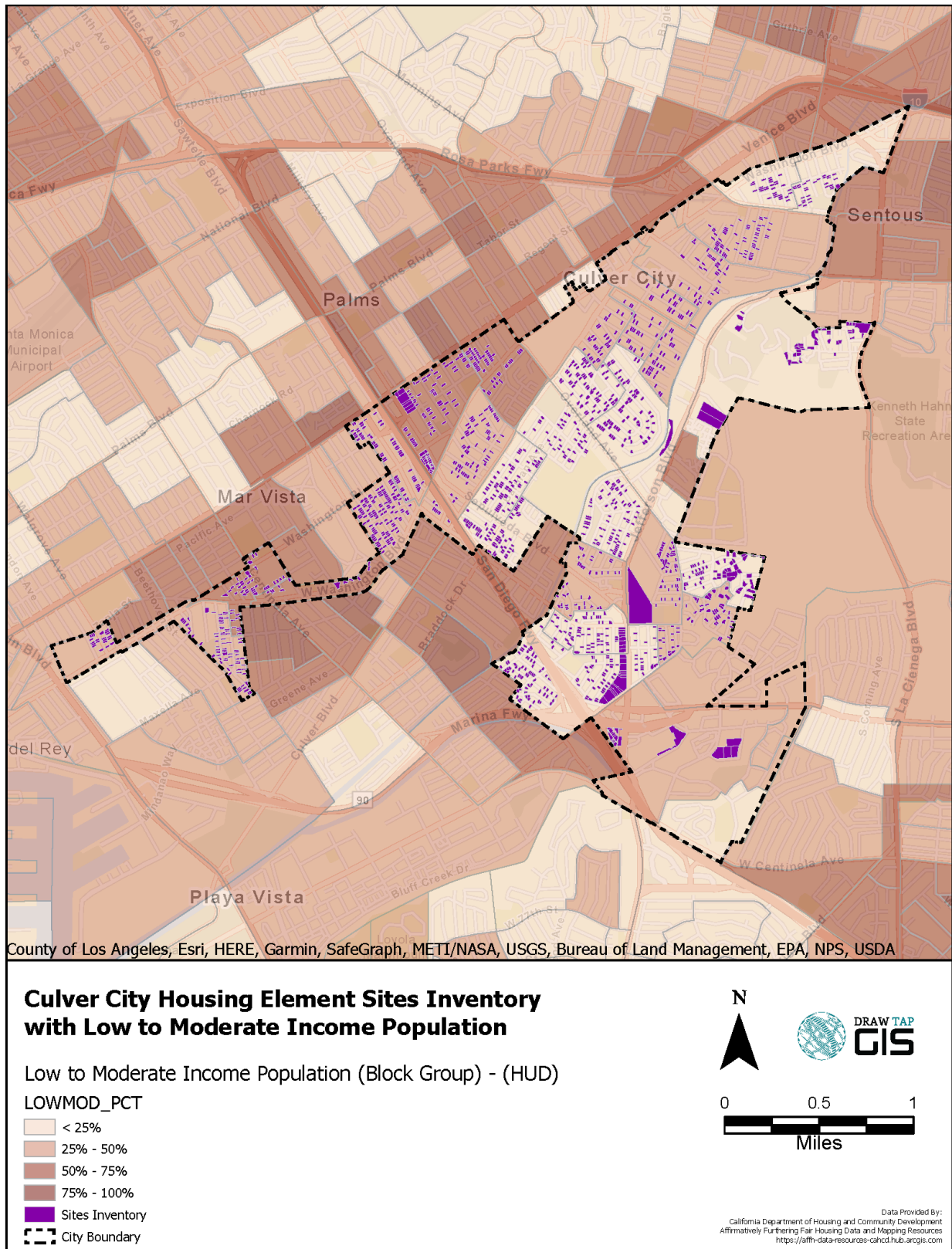
Figure E-6 also shows the sites used to meet the City's RHNA. As discussed previously, sites are generally evenly distributed throughout the City. Table E-7 shows that 42.8% of all RHNA units are in block groups where fewer than 25% of households are LMI, 42.5% of units are in block groups where 25-50% of households are LMI, and 14.7% of units are in block groups where 50-75% of households are LMI. Approximately 40.9% of moderate income units and 53.8% of above moderate income units are located in block groups where less than 25% of the population is LMI, compared to only 29.8% of very low income units and 27.8% of low income units.

TABLE E-7: BREAKDOWN OF RHNA UNITS BY LMI POPULATION

LMI Population (Block Group)	Very Low Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units	All RHNA Units
<25%	29.8%	27.8%	40.9%	53.8%	42.8%
25-50%	43.5%	43.6%	42.7%	41.6%	42.5%
50-75%	26.6%	28.6%	16.3%	4.6%	14.7%
Total	1,100	1,136	1,927	3,156	7,319

Note: The RHNA sites in this analysis include 1,410 Incremental Infill parcels that met the objective criteria for site selection.

FIGURE E-6: CONCENTRATION OF LMI HOUSEHOLDS

Culver City Housing Element Sites Inventory with Low to Moderate Income Population

Low to Moderate Income Population (Block Group) - (HUD)

LOWMOD_PCT

- < 25%
- 25% - 50%
- 50% - 75%
- 75% - 100%
- Sites Inventory
- City Boundary

Data Provided By:
California Department of Housing and Community Development
Affirmatively Furthering Fair Housing Data and Mapping Resources
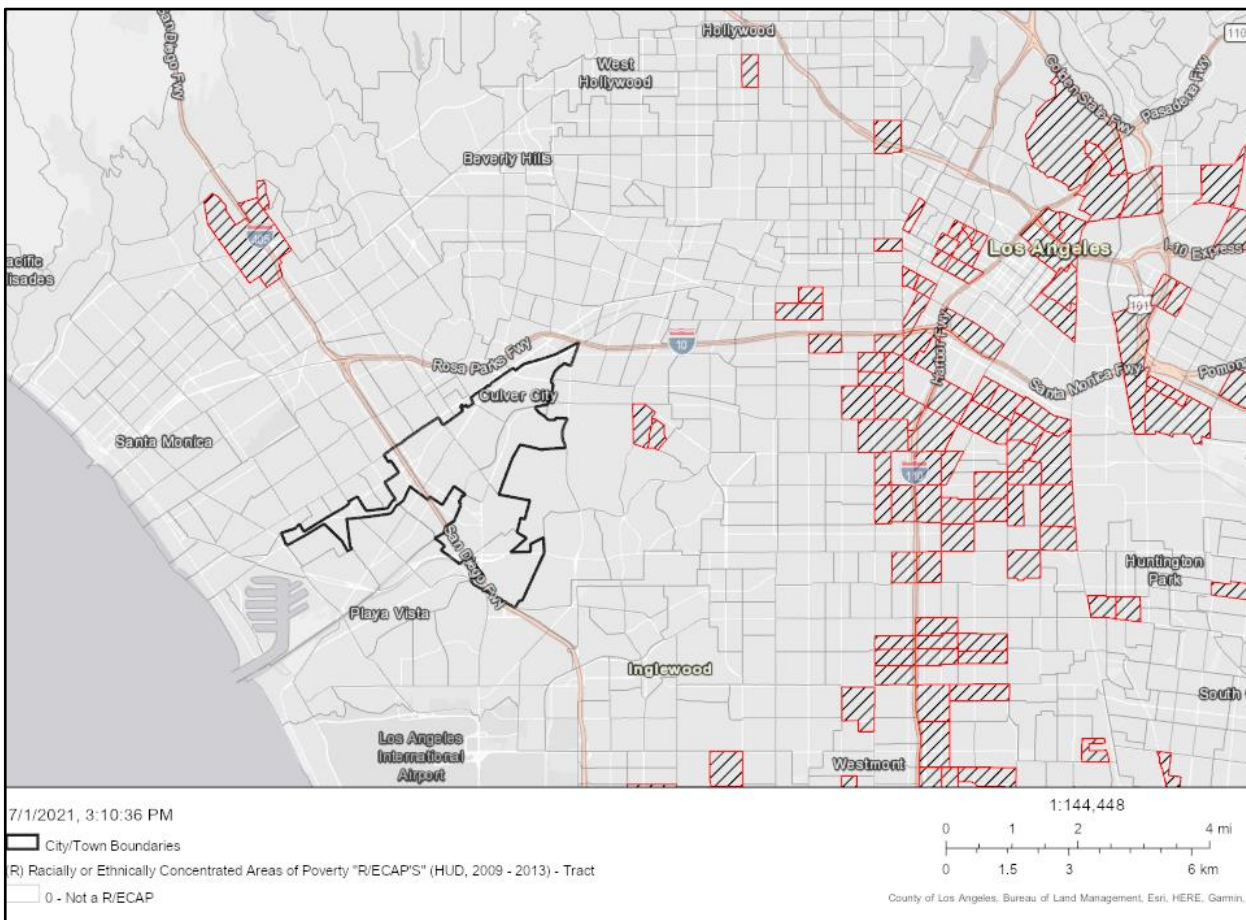https://affh-data-resources-cahcd.hub.arcgis.com

Source: HCD AFFH Data Viewer (HUD, 2011-2015 ACS), 2021.

3.   RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAPS)

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50%) with a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. According to HUD's 2020 R/ECAP mapping tool based on the 2009-2013 ACS, there are no R/ECAPs in Culver City. A regional view of R/ECAPs in Los Angeles County is shown in Figure E-7. There are also no Fair Housing Task Force identified areas of high segregation and poverty in the City. The Fair Housing Task Force Opportunity maps are further described in Section 4, Access to Opportunities, of this analysis.

FIGURE E-7: R/ECAPS

Source: HCD AFFH Data Viewer (HUD, 2009-2013), 2021.

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF AFFLUENCE (RCAAS)

004 While racially concentrated areas of poverty and segregation (R/ECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. A HUD Policy Paper defines racially concentrated areas of affluence as affluent, White communities. According to this report, Whites are the most racially segregated group in the United States and "in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities." Based on their research, HCD defines RCAAs as census tracts where 1) 80% or more of the population is white, and 2) the median household income is $125,000 or greater (slightly more than double the national median household income in 2016).

Figure E-8 shows predominantly White populations by census tract and Figure E-9 shows median income by block group. Several block groups in the City have median incomes over $125,000. Block groups along the northwestern City boundary have median incomes below $125,000, many below the State average of $87,100. Most tracts in Culver City are White predominant; however, as shown in Figure E-2 above, there are no block groups in the City where racial/ethnic minorities make up less than 20% of the population. Therefore, there are no areas in the City that are considered RCAAs.

FIGURE E-8: WHITE PREDOMINANT CENSUS TRACTS
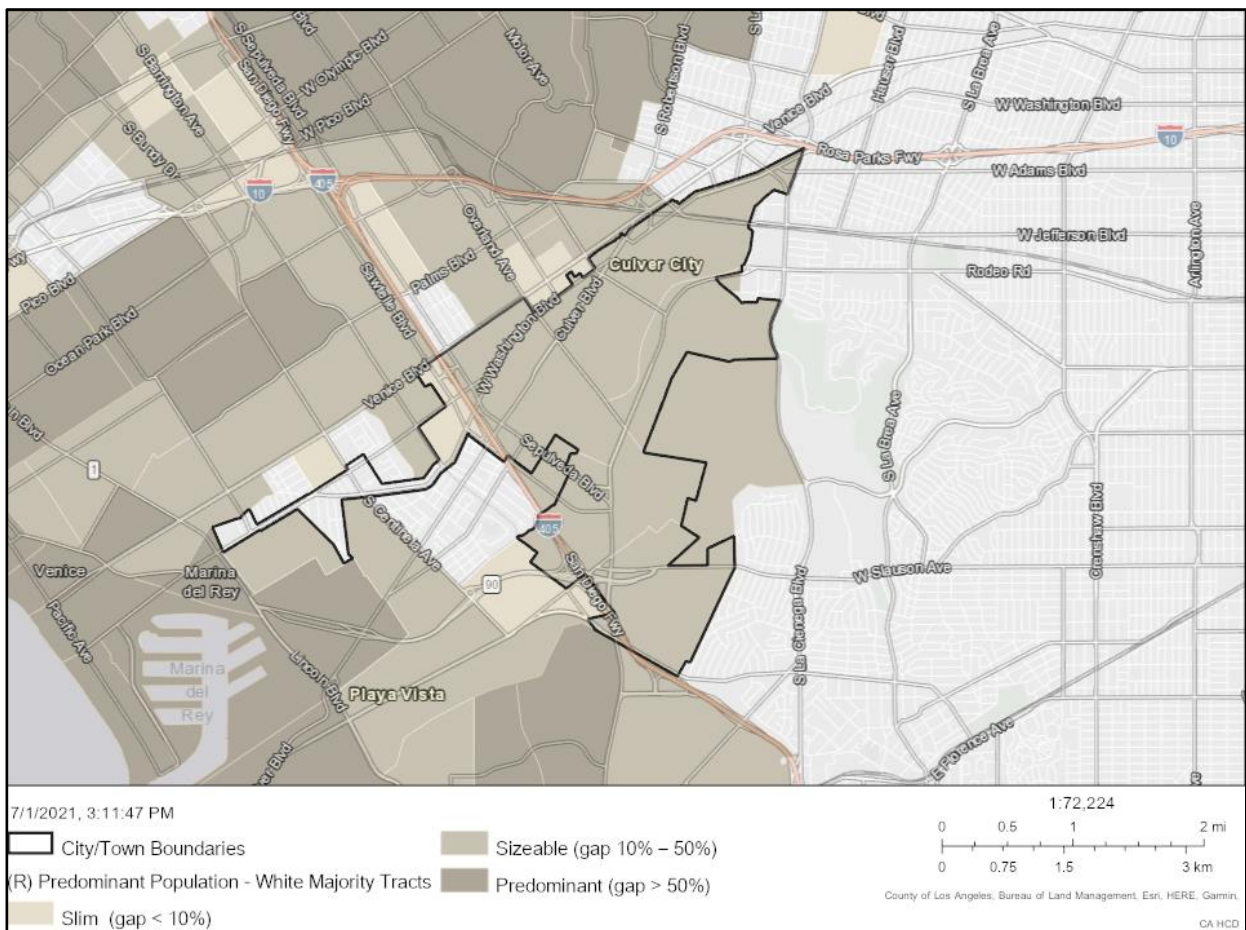
Source: HCD AFFH Data Viewer, 2021.

#004

Posted by **Philip Lelyveld** on **09/08/2021** at **8:38pm** [Comment ID: 3878] - Link
Type: Missing
Agree: 0, Disagree: 0
This is, by its very title, a fundamentally racist approach to planning. If you think this is a reasonable approach, where is the similar map of Muslim concentration? Or handicapped concentration? Or Asian concentration? I strongly object to singling out any race, ethnicity, sexual orientation, ability, or any other human factor is a government document focused on LAND USE!

FIGURE E-9: MEDIAN INCOME BY BLOCK GROUP
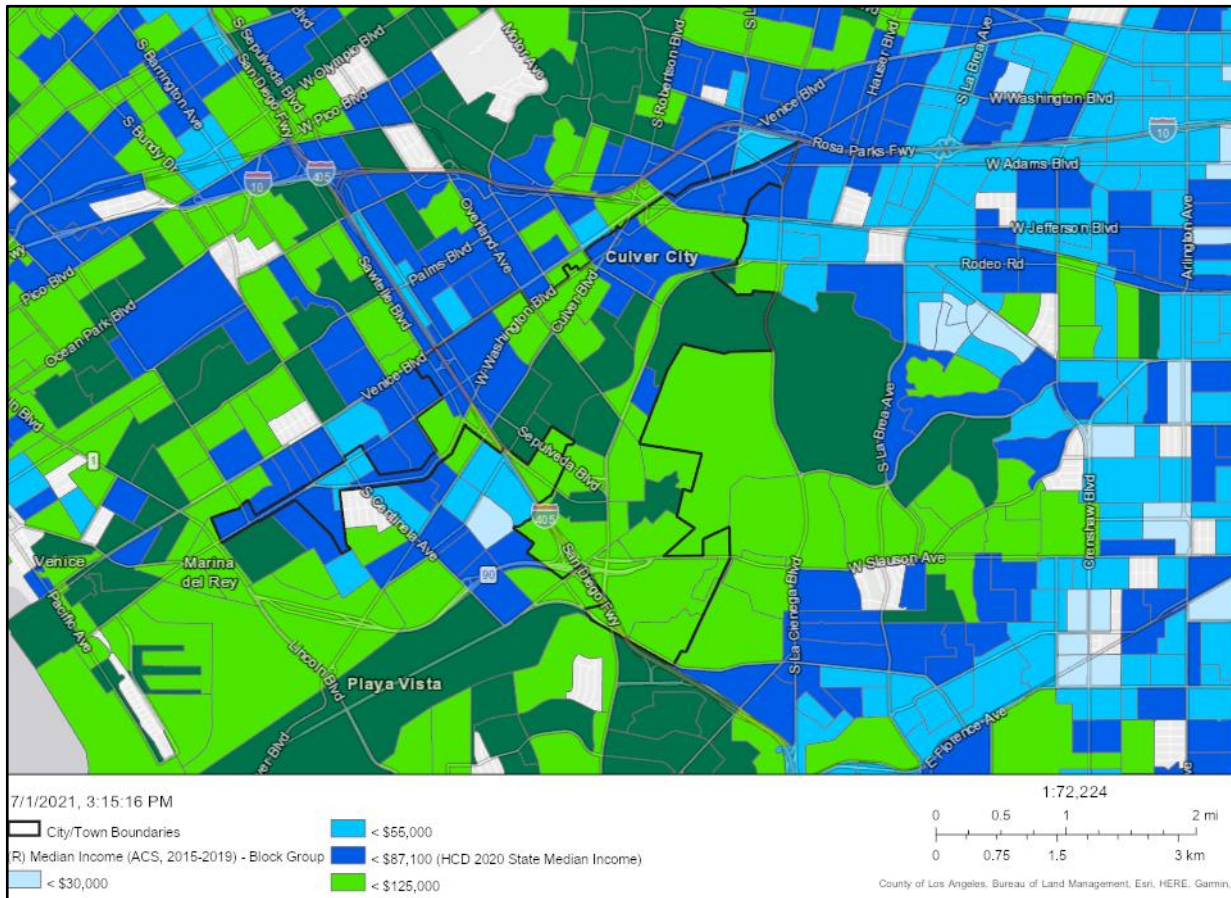
Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

4.   ACCESS TO OPPORTUNITIES

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity based on race/ethnicity and poverty status. Table E-8 shows index scores for the following opportunity indicator indices (values range from 0 to 100):

- Low Poverty Index: The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the less exposure to poverty in a neighborhood.

- School Proficiency Index: The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the score, the higher the school system quality is in a neighborhood.

- Labor Market Engagement Index: The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.

- Transit Trips Index: This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the trips transit index, the more likely residents in that neighborhood utilize public transit.

- Low Transportation Cost Index: This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the index, the lower the cost of transportation in that neighborhood.

- Jobs Proximity Index: The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better access to employment opportunities for residents in a neighborhood.

- Environmental Health Index: The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. The higher the value, the better environmental quality of a neighborhood.

In the Los Angeles Urban County, Hispanic residents are most likely to be impacted by poverty, low labor market participation, and poor environmental quality. Black residents experience the lowest school proficiency and have the least access to employment opportunities. White residents scored the highest in low poverty, labor market participation, jobs proximity, and environmental health and Asian/Pacific Islander residents scored the highest in school proficiency. Hispanic residents are most likely to use public transit and Black residents have the lowest transportation costs.

Compared to the County, Urban County residents, regardless of race or ethnicity, were less likely to be exposed to poverty and have higher school proficiency. Residents countywide are more likely to use public transit and have lower transportation costs compared to Urban County residents. Environmental health is better in the Urban County for White, Black, and Native American residents, but worse for Hispanic and Asian residents.

TABLE E-8: HUD OPPORTUNITY INDICATORS 005

	Low Poverty	School Proficiency	Labor Market	Transit	Low Trans. Cost	Jobs Proximity	Envi. Health
Urban County (including Culver City)							
Total Population							
White, Non-Hispanic	70.12	72.18	68.22	76.66	67.60	55.10	22.89
Black, Non-Hispanic	46.29	41.09	42.82	84.10	73.91	41.10	14.44
Hispanic	40.70	43.31	34.05	84.98	73.75	44.48	11.98
Asian or Pacific Islander, Non-Hispanic	68.38	72.86	66.73	82.22	68.98	51.22	13.86
Native American, Non-Hispanic	54.75	55.06	48.03	77.80	69.62	45.65	20.02
Population below federal poverty line							
White, Non-Hispanic	61.23	66.91	61.96	79.48	71.45	55.51	20.59
Black, Non-Hispanic	29.03	29.31	27.29	85.47	76.25	30.59	12.84
Hispanic	28.75	35.77	26.10	87.23	76.67	41.99	10.38
Asian or Pacific Islander, Non-Hispanic	61.63	70.67	62.58	83.88	72.41	51.16	13.30
Native American, Non-Hispanic	41.92	47.90	41.36	84.81	73.95	51.00	12.82
Los Angeles County							
Total Population							
White, Non-Hispanic	65.19	68.03	67.43	77.63	73.13	54.59	21.35
Black, Non-Hispanic	36.07	33.82	35.34	87.25	79.02	40.72	11.92
Hispanic	35.53	39.72	35.73	86.48	77.78	43.70	12.36
Asian or Pacific Islander, Non-Hispanic	55.03	61.94	57.64	85.13	75.98	51.11	13.13
Native American, Non-Hispanic	48.40	50.70	48.58	81.04	75.36	45.88	17.68
Population below federal poverty line							
White, Non-Hispanic	53.66	60.62	59.62	83.19	78.51	56.98	18.46
Black, Non-Hispanic	24.12	28.03	26.41	88.34	81.07	36.90	11.74
Hispanic	25.05	33.70	29.50	89.09	80.94	44.63	10.63
Asian or Pacific Islander, Non-Hispanic	45.45	57.59	51.41	88.58	80.61	52.88	11.05
Native American, Non-Hispanic	33.63	39.10	36.05	84.43	78.22	47.65	16.22

Source: HUD AFFH Data, 2020.

#005

Posted by **JIll Vesci** on **07/30/2021** at **11:59am** [Comment ID: 3480] - Link
Type: Missing
Agree: 1, Disagree: 0
please provide Culver City Specific data and compare to county.

To assist in this analysis, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened in the California Fair Housing Task Force (Task Force) to "provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD)." The Task force has created Opportunity Maps to identify resources levels across the state "to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits (LIHTCs)". These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Based on these domain scores, tracts are categorized as Highest Resource, High Resource, Moderate Resource, Moderate Resource (Rapidly Changing), Low Resource, or areas of High Segregation and Poverty. Table E-9 shows the full list of indicators.

TABLE E-9: DOMAINS AND INDICATORS FOR OPPORTUNITY MAPS

Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates
Poverty and Racial Segregation	Poverty: tracts with at least 30% of population under federal poverty line Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

Source: CA Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020.

Opportunity map scores for Culver City census tracts are presented in Figure E-10. Tracts in the central and eastern areas of the City are categorized as highest resource, two tracts are considered high resource, and one tract in the western corner on the City is considered moderate resource. There are no tracts in the City that are categorized as areas of high segregation and poverty. The moderate resource tract also contains block groups with higher concentrations of racial/ethnic minorities and LMI households. The individual scores for the domains described above (economic, environment, and education) are further detailed in the following sections.

TABLE E-10: TCAC OPPORTUNITY MAP SCORES BY CENSUS TRACT

Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Score	Final Category
6037702400	0.899	0.099	0.804	0.444	Highest Resource
6037702501	0.977	0.341	0.873	0.814	Highest Resource
6037702502	0.933	0.267	0.891	0.705	Highest Resource
6037702600	0.93	0.165	0.911	0.703	Highest Resource
6037702700	0.945	0.33	0.727	0.528	Highest Resource
6037702700	0.945	0.33	0.727	0.528	Highest Resource
6037702801	0.814	0.496	0.767	0.422	High Resource
6037702802	0.892	0.21	0.552	0.215	High Resource
6037702803	0.751	0.184	0.438	-0.032	Moderate Resource
6037703001	0.913	0.139	0.561	0.232	High Resource

Figure E-10 also includes the sites used to meet Culver City's 2021-2029 RHNA. As discussed previously, there is only one tract categorized as moderate resource in the City. Approximately 7.4% of all RHNA units, including 3.2% of very low income units, 3.3% of low income units, and 9.6% of moderate income units and 9% of above moderate income units, are located in the moderate resource tract. Most very low (58.5%) and low (60.6%) income units are in high resource tracts, and most moderate (64.2%) and above moderate (74.3%) income units are in highest resource tracts.

TABLE E-10: BREAKDOWN OF RHNA UNITS BY TCAC OPPORTUNITY SCORE

TCAC Opportunity Area (Tract)	Very Low Income Units	Low Income Units	Moderate Income Units	Above Moderate Income Units	All RHNA Units
Highest Resource	38.4%	36.1%	64.2%	74.3%	60.3%
High Resource	58.5%	60.6%	26.2%	16.6%	32.2%
Moderate Resource	3.2%	3.3%	9.6%	9.0%	7.4%
Total	1,100	1,136	1,927	3,156	7,319

Note: The RHNA sites in this analysis include 1,410 Incremental Infill parcels that met the objective criteria for site selection.
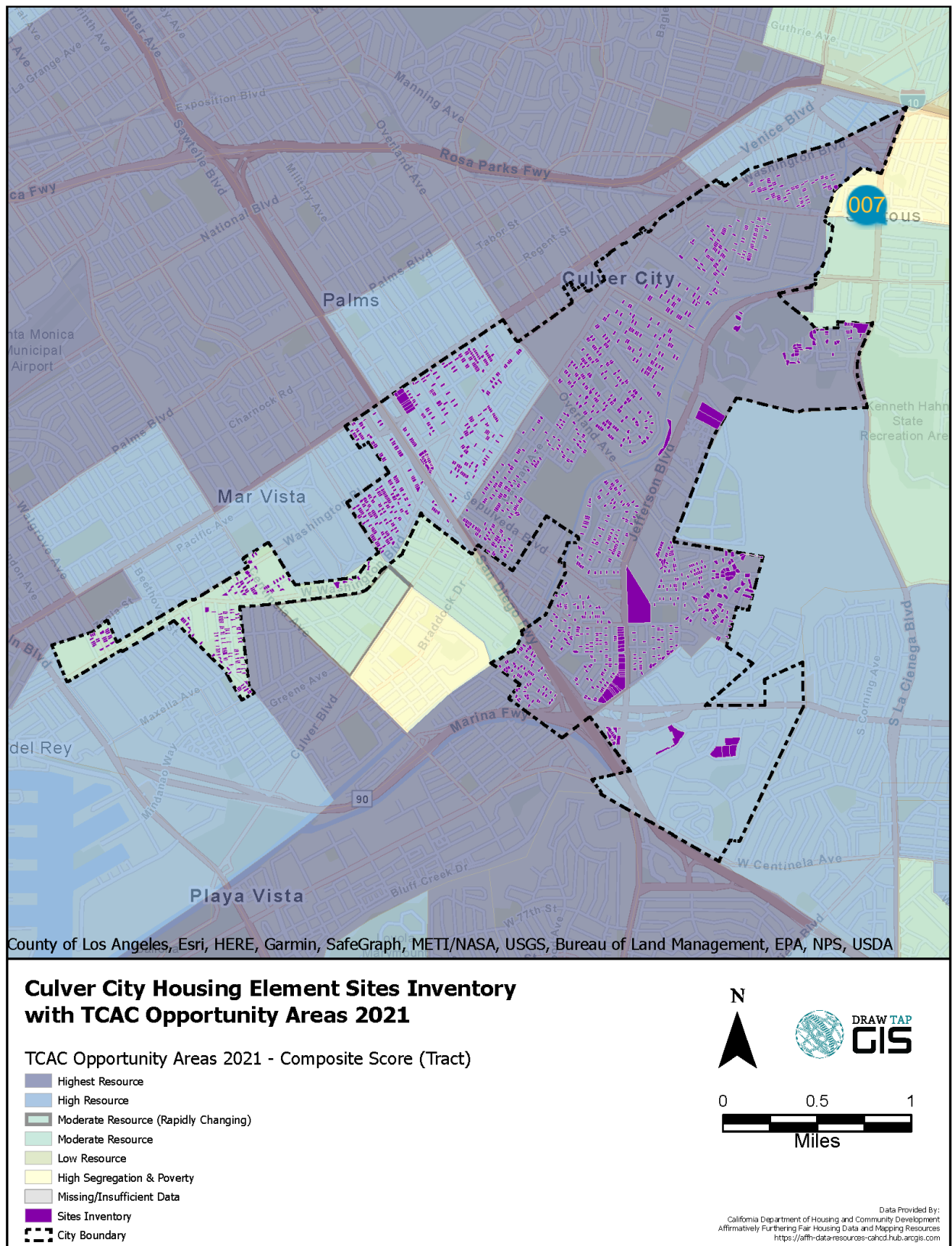
#006

Posted by **Paavo monkkonen** on **07/23/2021** at **12:18am** [Comment ID: 3341] -
Agree: 1, Disagree: 0
These tables do not convey the distribution of units within Culver City very well, given how much of the city is classified as higher resource areas.

FIGURE E-10: TCAC OPPORTUNITY AREAS (COMPOSITE SCORE)

Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

#007

Posted by **Stephen Jones** on **07/28/2021** at **3:56pm** [Comment ID: 3459] - Link
*Type: Suggestion*
Agree: 0, Disagree: 0
Please note the areas of high segregation and poverty just outside our borders. I'd ask you to take this into account in assessing the equitable distribution of housing, especially lower income housing. For example, you might set our lower income targets even higher than RHNA to account for the between Culver City and our nearest neighbors, especially on the far east and west sides of town.

ECONOMIC

As described previously, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. According to the 2021 Task Force maps presented in Figure E-11, all of Culver City received economic scores in the highest quartile. Culver City scored similar to jurisdictions to the west, but higher than Los Angeles County areas to the east.

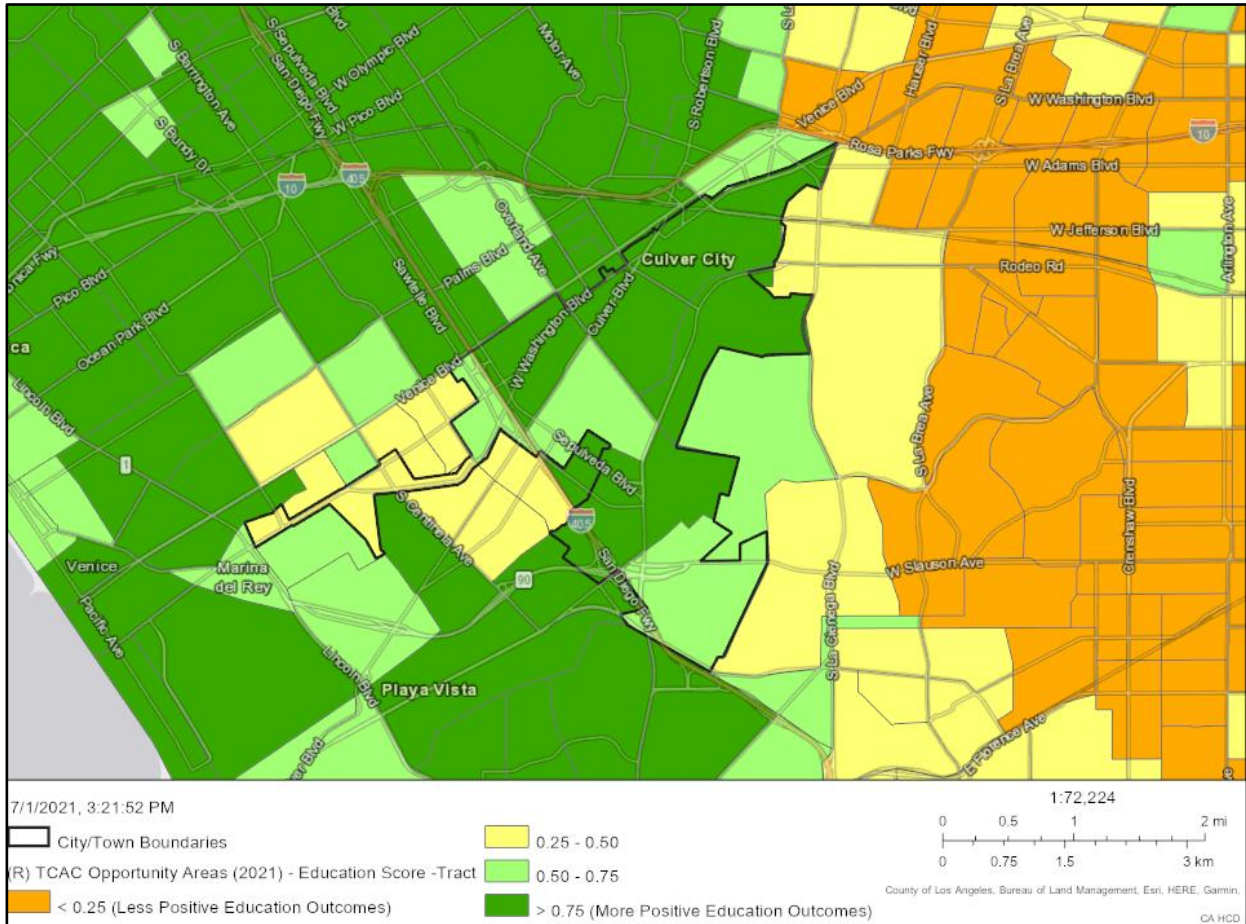### FIGURE E-11: TCAC OPPORTUNITY AREAS (ECONOMIC SCORE)
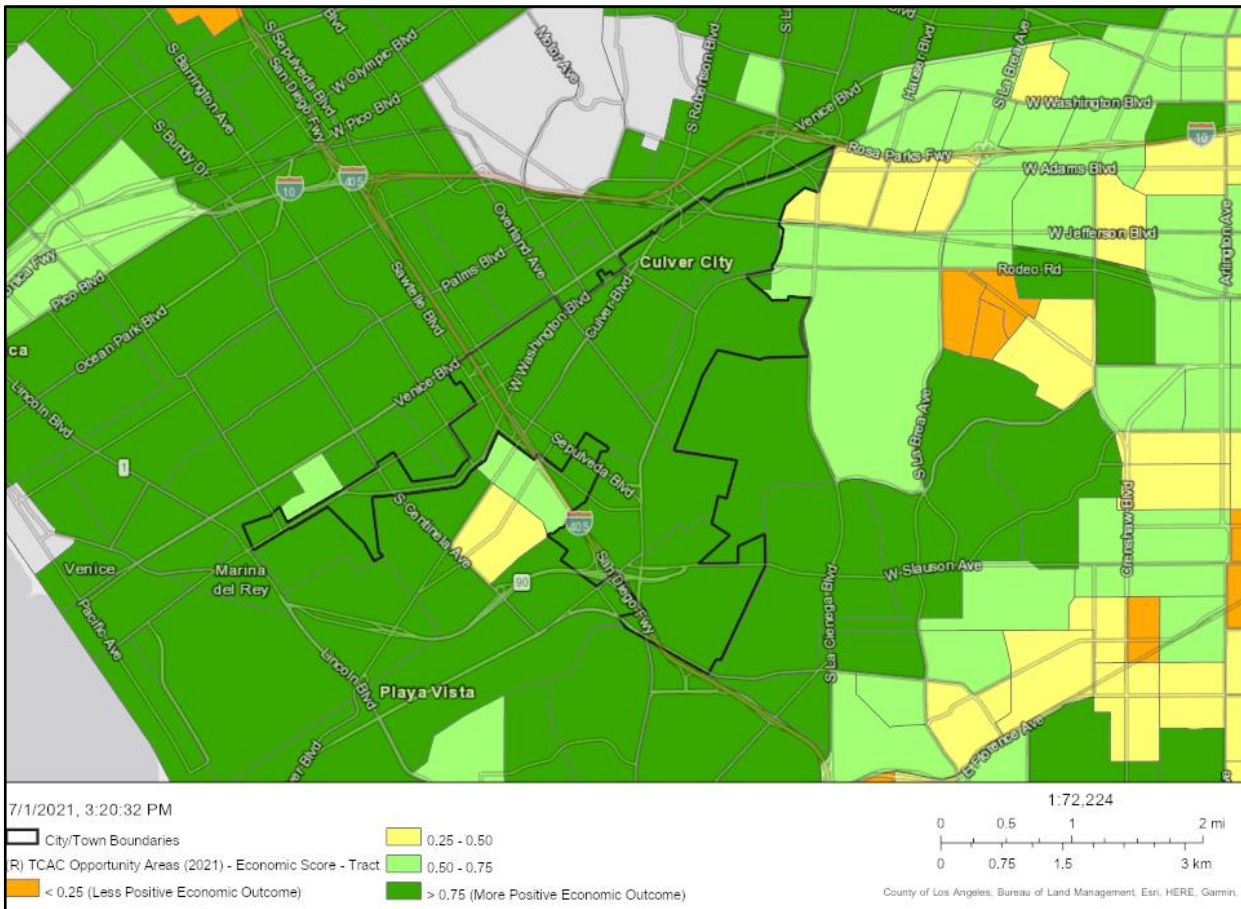
Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

EDUCATION

As described above, the Fair Housing Task Force determines education scores based on math and reading proficiency, high school graduation rates, and student poverty rates. As shown in Figure E-12, the tract in the western corner of the City received a lower education score than the rest of the City. The central, southern, and northeastern areas of the City received education scores of 0.50 and above. As described above, the tracts on the western side of Culver City with a lower education score is also categorized as a moderate resource area.

**FIGURE E-12: TCAC OPPORTUNITY AREAS (EDUCATION SCORE)**

Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

ENVIRONMENTAL

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 3.0 pollution indicators and values. Figure E-13 shows that tracts in the northeastern, southern, and western corners of Culver City received environmental scores in the lowest quartile. All tracts in Culver City scored below 0.50, indicating less positive environmental outcomes. These areas also have higher concentrations of racial/ethnic minorities. As described above, the tract in the western corner of the City also received lower education scores and is considered a moderate resource area. Despite the low environmental score Citywide, most tracts in Culver City are categorized as high and highest resource.

**FIGURE E-13: TCAC OPPORTUNITY AREAS (ENVIRONMENTAL SCORE)**
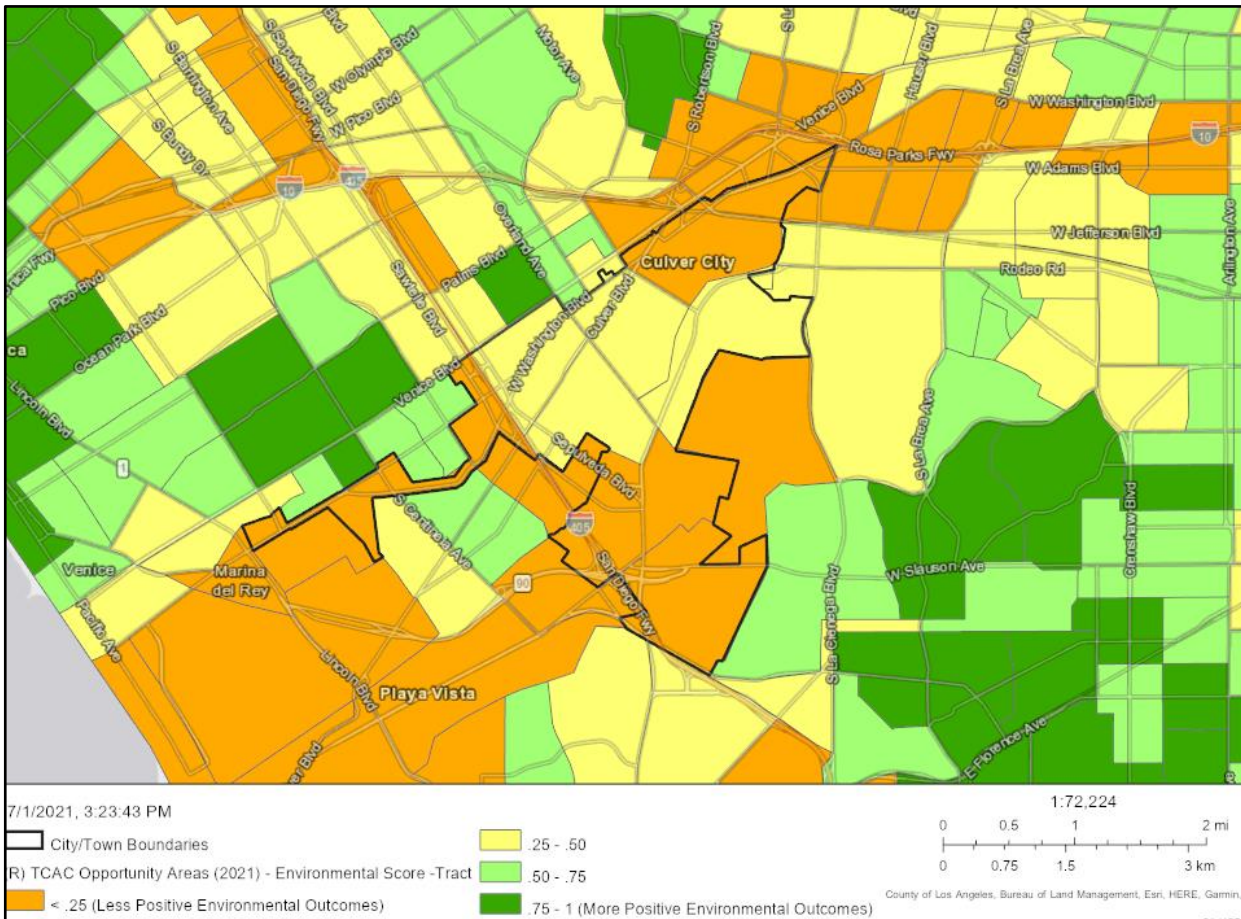
Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

TRANSPORTATION

All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service.[22] Culver City's All Transit Performance score of 8.8 is higher than the surrounding jurisdictions of Inglewood (7.7), Santa Monica (8.8), Beverly Hills (8.2), West Hollywood (8.7), the City of Los Angeles (7.7), and the County (6.8). The City's score of 8.8 illustrates an "excellent" combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work. Culver City has a lower proportion of households with commuters that use transit (3.4%) than the County (6.7%).

HUD's Job Proximity Index, described previously, can be used to show transportation need geographically. Block groups with lower jobs proximity indices are located further from employment opportunities and have a higher need for transportation. As shown in Figure E-14, employment opportunities are very accessible for most block groups in the City. Block groups in the northeastern, central, and southern sections of the City are located closest to employment opportunities. Employment opportunities are slightly less accessible on the western side of the City. This area is also considered moderate resource according to the Fair Housing Task Force maps above.

FIGURE E-14: JOBS PROXIMITY INDEX BY BLOCK GROUP
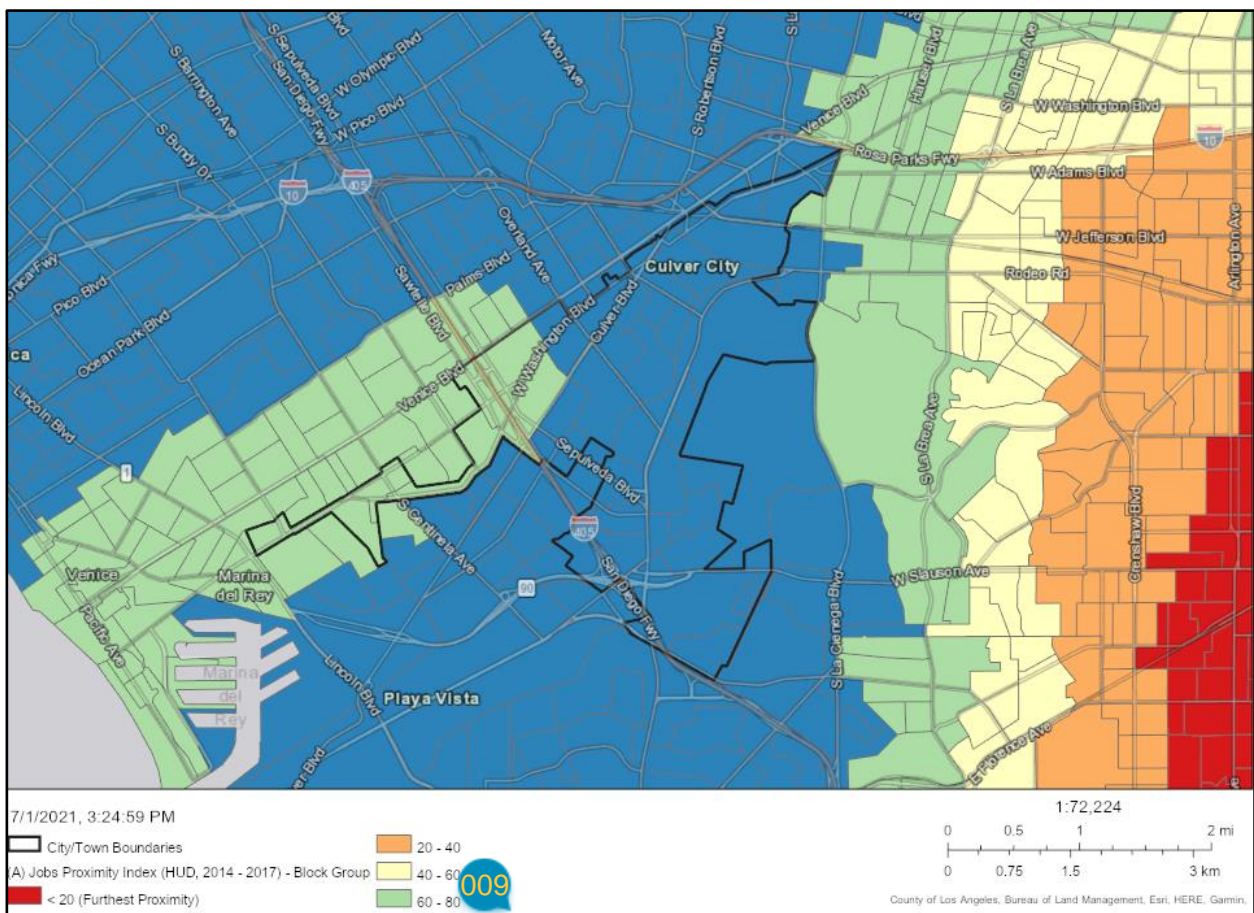
Source: HCD AFFH Data Viewer (HUD, 2014-2017), 2021.

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[22] AllTransit. 2019 Metrics: AllTransit Performance Score. https://alltransit.cnt.org/. Accessed July 2021.

#008

Posted by **JIll Vesci** on **07/30/2021** at **12:03pm** [Comment ID: 3482] - Link
Type: Missing
Agree: 0, Disagree: 0
reconcile this with the statements about jobs housing balance / GHG and the need to intensify R1 elsewhere in the housing element. The data again seems to contradict the suppositions

#009

Posted by **JIll Vesci** on **07/28/2021** at **1:33pm** [Comment ID: 3456] - Link
*Type: Missing*
Agree: 0, Disagree: 0
Legend is missing classes.

Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities. SCAG developed a mapping tool for High Quality Transit Areas (HQTA) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. Almost all of Culver City is considered an HQTA. HQTAs are shown in Figure E-15.

FIGURE E-15: HQTAS
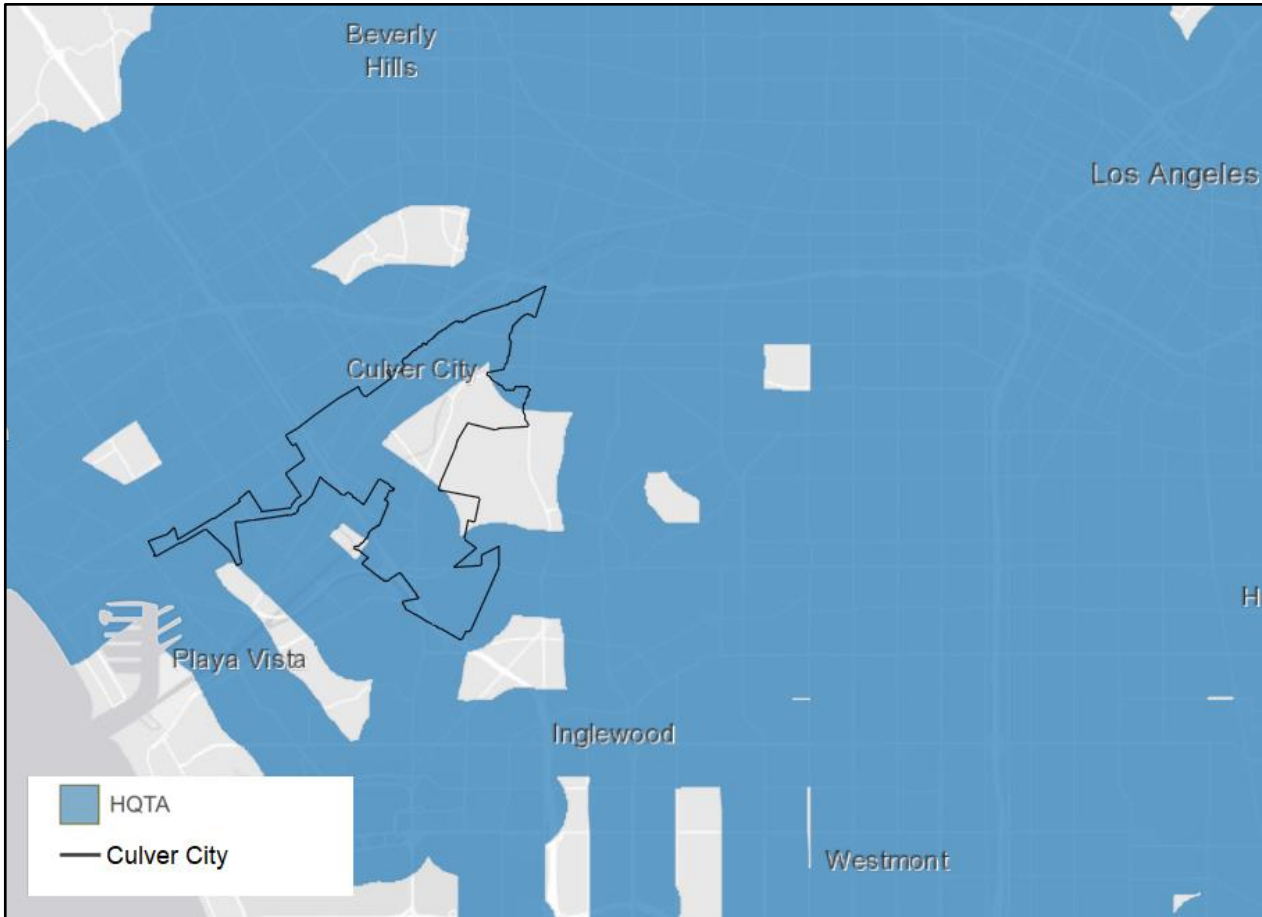
Source: HCD AFFH Data Viewer (HUD, 2014-2017), 2021.

5.   DISPROPORTIONATE HOUSING NEEDS

Housing problems in Culver City were calculated using HUD's 2020 Comprehensive Housing Affordability Strategy (CHAS) data based on the 2013-2017 ACS. Table E-11 breaks down households by race and ethnicity and presence of housing problems for Culver City and Los Angeles County households. The following conditions are considered housing problems:

- Substandard Housing (incomplete plumbing or kitchen facilities)

- Overcrowding (more than 1 person per room)

- Cost burden (housing costs greater than 30%)

In Culver City, 35.6% of owner-occupied households and 49.1% of renter-occupied households have one or more housing problem. The City has a lower proportion of households with a housing problem compared to the County, where 38.9% of owner-occupied households and 62.3% of renter-occupied households experience a housing problem. In Culver City, Hispanic renter-occupied households and Black owner-occupied households have the most housing problems. Approximately 59% of Black owner-occupied households and 65% of Hispanic renter-occupied households experience a housing problem. Black and Hispanic

TABLE E-11: HOUSING PROBLEMS BY RACE/ETHNICITY

With Housing Problem	White	Black	Asian	Am. Indian	Pac. Isldr.	Hispanic	Other	All
Culver City								
Owner-Occupied	32.2%	59.2%	31.9%	0.0%	--	43.9%	30.0%	35.6%
Renter-Occupied	42.1%	50.0%	46.3%	--	--	64.5%	34.2%	49.1%
Los Angeles County								
Owner-Occupied	32.1%	41.5%	38.3%	39.7%	39.7%	48.2%	36.5%	38.9%
Renter-Occupied	52.6%	63.7%	56.3%	56.4%	55.5%	71.1%	55.7%	62.3%

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

COST BURDEN

Cost burden by tenure based on HUD CHAS data is shown in Table E-12. Black owner households and Hispanic renter households have the highest rate of cost burden in the City (58.5% and 58.2%, respectively). Cost burden amongst owner-households is lower than renter-households for all racial/ethnic groups other than Black households. None of the 15 American Indian owner-occupied households are cost burdened. White owner households, Asian owner households, and "other" renter households are the least cost burdened racial/ethnic groups.

Figure E-16 compares cost burdened owner households using the 2010-2014 and 2015-2019 ACS. The proportion of cost burdened homeowners has decreased since the 2010-2014 ACS, specifically in tracts along the northwest City boundary. Only 20-40% of owners in these tracts experience cost burden, compared to 40-60% throughout the rest of the City.

Cost burden trends for renter-occupied households is shown in Figure E-17. Since the 2010-2014 ACS, the proportion of cost burdened renters has fluctuated throughout the City. Two tracts in the western corner of the City saw the proportion of cost burdened renters increase from 40-60% to 60-80%. These tracts also have higher concentrations of racial/ethnic minorities and LMI households and one is categorized as moderate resource (see Figure E-2, Figure E-6, and Figure E-10). However, several tracts in the central and southern areas of the City saw a decrease in cost burdened renters.

TABLE E-12: COST BURDEN BY RACE/ETHNICITY

Race/Ethnicity	Cost Burden (>30%)	Severe Cost Burden (>50%)	Total Households
Owner-Occupied			
White, non-Hispanic	31.3%	15.2%	5,605
Black, non-Hispanic	58.5%	21.8%	735
Asian, non-Hispanic	26.7%	10.7%	1,350
Amer. Ind, non-Hispanic	0.0%	0.0%	15
Hispanic	36.4%	8.1%	990
Other	33.3%	13.3%	150
Renter-Occupied			
White, non-Hispanic	36.8%	19.5%	3,410
Black, non-Hispanic	42.6%	28.7%	680
Asian, non-Hispanic	34.4%	12.4%	1,295
Hispanic	58.2%	31.5%	2,045
Other	30.9%	3.6%	275

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

FIGURE E-16: (A) OVERPAYMENT BY HOMEOWNERS (2010-2014)
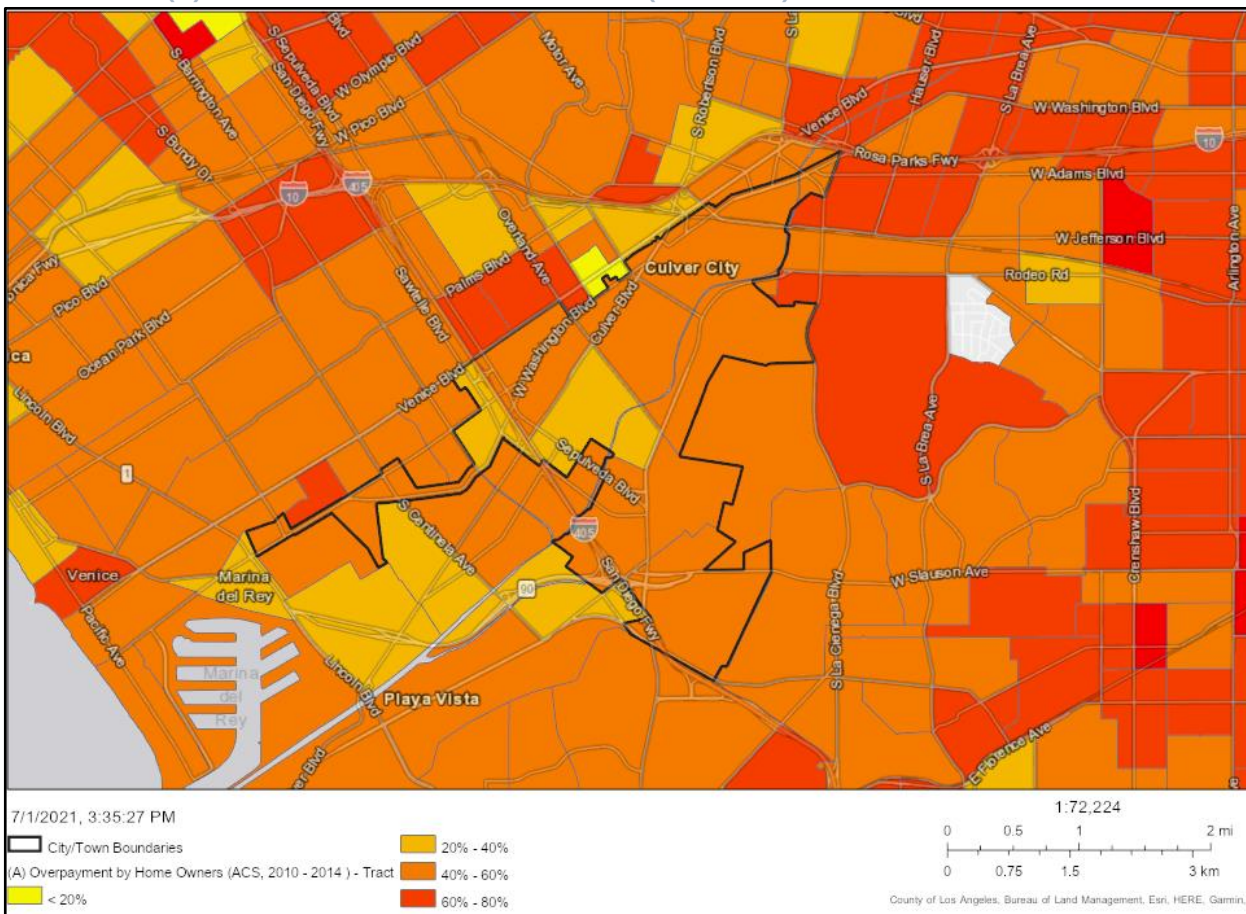
#010

Posted by **Jeannine Wisnosky Stehlin** on **07/31/2021** at **1:00am** [Comment ID: 3512] - Link
Type: Suggestion
Agree: 0, Disagree: 0
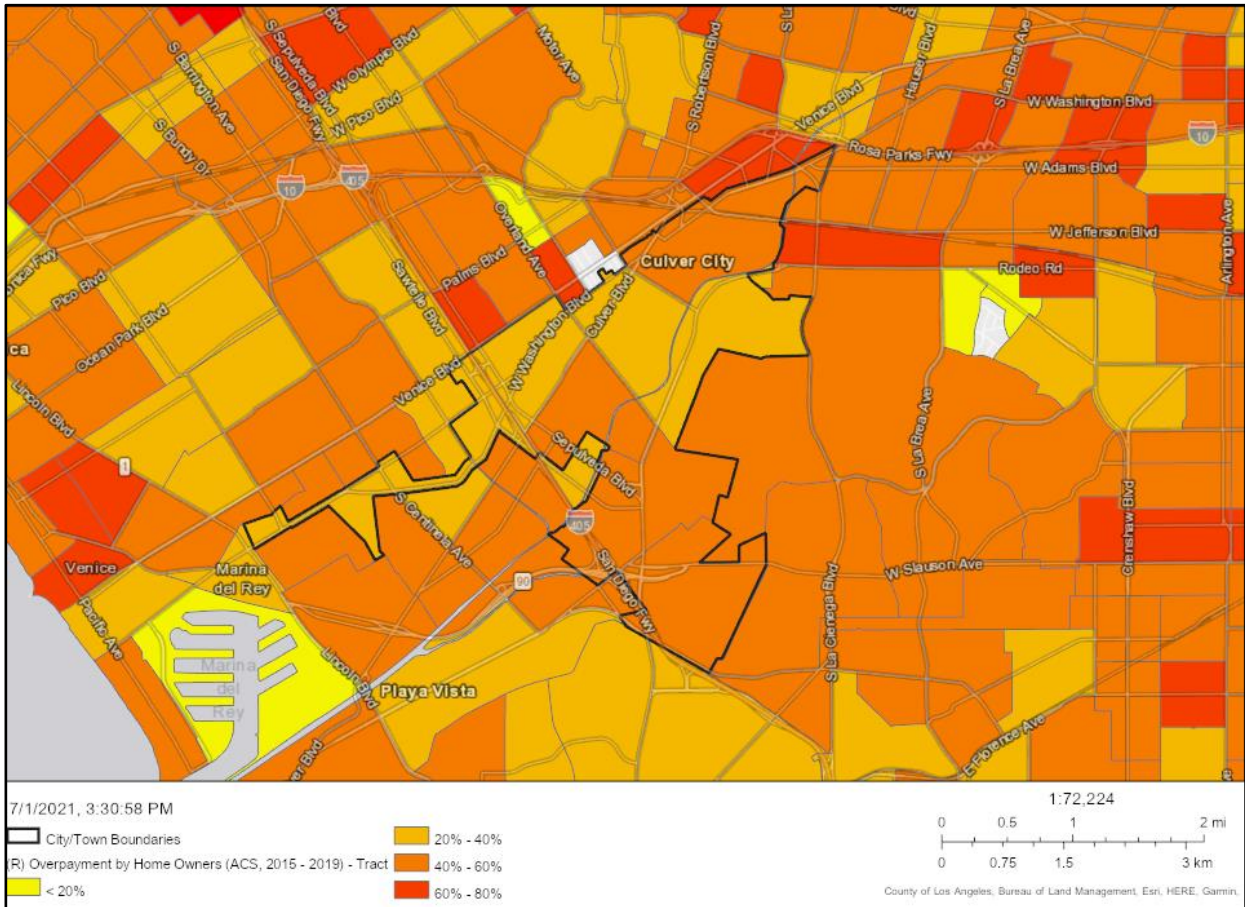Please provide context. What city do these numbers represent?

#011

Posted by **JIll Vesci** on **07/30/2021** at **12:06pm** [Comment ID: 3484] - Link
Type: Missing
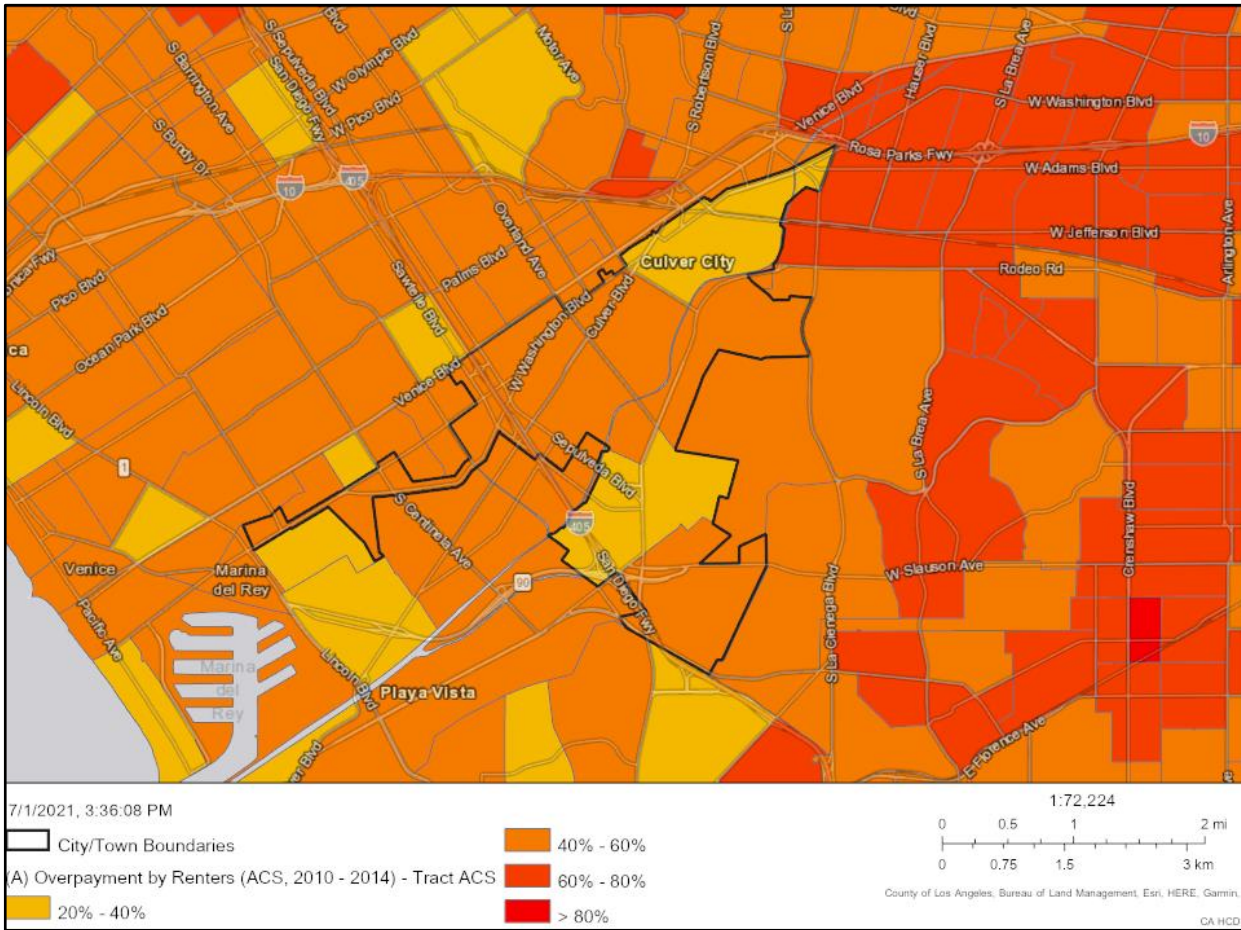*Agree: 1, Disagree: 0*
Culver City? County? are they compared or indexed?

(B) OVERPAYMENT BY HOMEOWNERS (2015-2019)
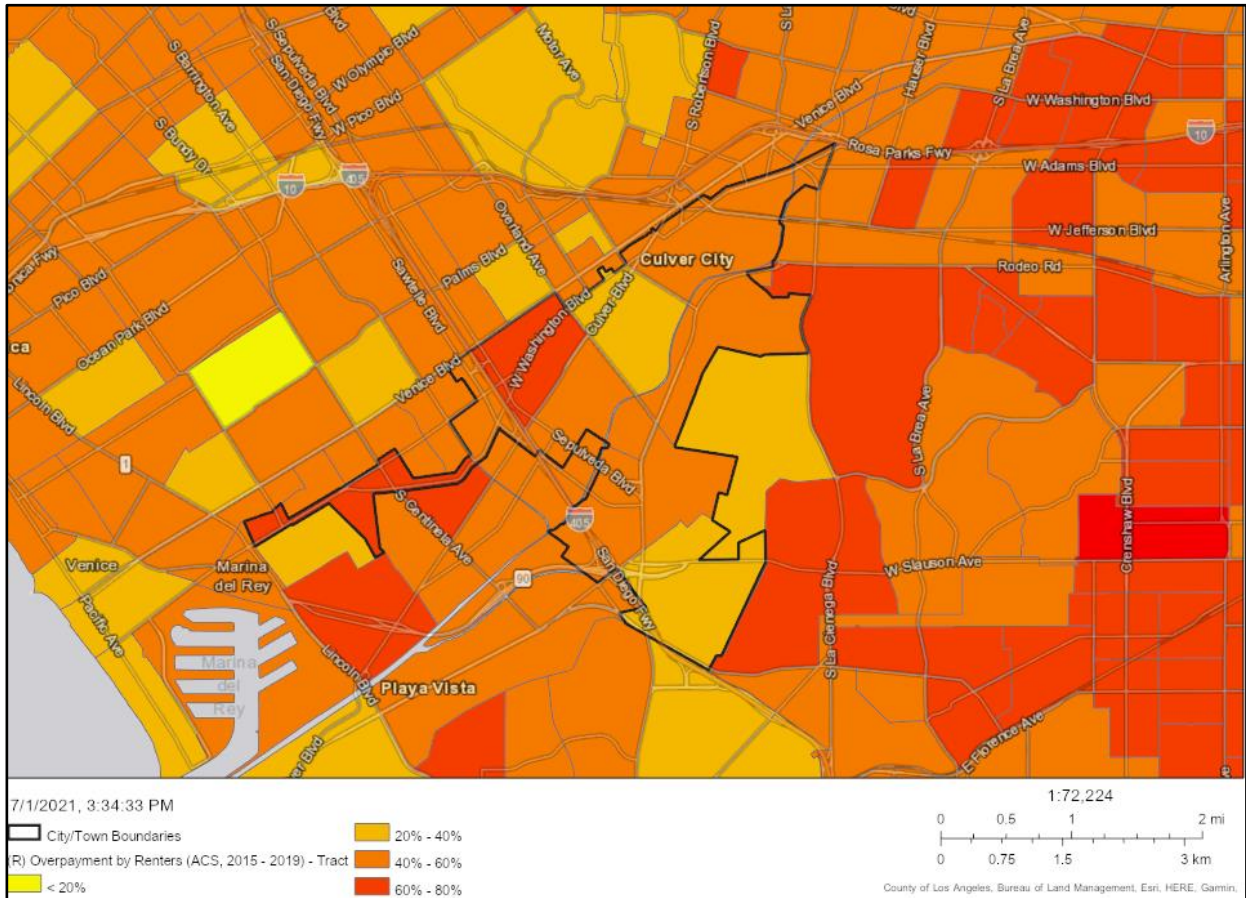

Source: HCD AFFH Data Viewer (2010-2014 and 2015-2019 ACS), 2021.

FIGURE E-17: (A) OVERPAYMENT BY RENTERS (2010-2014)

(B) OVERPAYMENT BY RENTERS (2015-2019)

Source: HCD AFFH Data Viewer (2010-2014 and 2015-2019 ACS), 2021.

OVERCROWDING

A household is considered overcrowded if there is more than one person per room and severely overcrowded is there is more than 1.5 persons per room. Table E-13, below, shows that approximately 2.7% of owner-occupied households and 8.7% of renter-occupied households in Culver City are overcrowded. Overcrowding is less common in Culver City than the County, where 5.7% of owner-occupied households and 16.7% of renter-occupied households are overcrowded. Only 0.8% of owner households and 3.8% of renter households in Culver City are severely overcrowded.

Figure E-18 shows the concentration of overcrowded households in Culver City by census tract. Overcrowded households account for less than 8.2% (statewide average) of households in most tracts. Between 8.3 and 12% of households are overcrowded in two tracts in the western corner of the City. As discussed previously, these tracts also have a higher concentration of cost burdened renters, racial/ethnic minorities, and LMI households (see Figure E-2, Figure E-6, and Figure E-17). One of the tracts with a higher concentration of overcrowded households is also a moderate resource area (see Figure E-10). There are no tracts in Culver City with a concentration of severely overcrowded households exceeding 6%.

TABLE E-13: OVERCROWDING BY TENURE

	Overcrowded (>1 person per room)		Severely Overcrowded (>1.5 person per room)		Total Households
	Households	Percent	Households	Percent	
Culver City					
Owner-Occupied	240	2.7%	70	0.8%	8,840
Renter-Occupied	670	8.7%	295	3.8%	7,705
Los Angeles County					
Owner-Occupied	85,870	5.7%	23,025	1.5%	1,512,365
Renter-Occupied	298,460	16.7%	134,745	7.6%	1,782,835

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

FIGURE E-18: (A) OVERCROWDED HOUSEHOLDS BY CENSUS TRACT
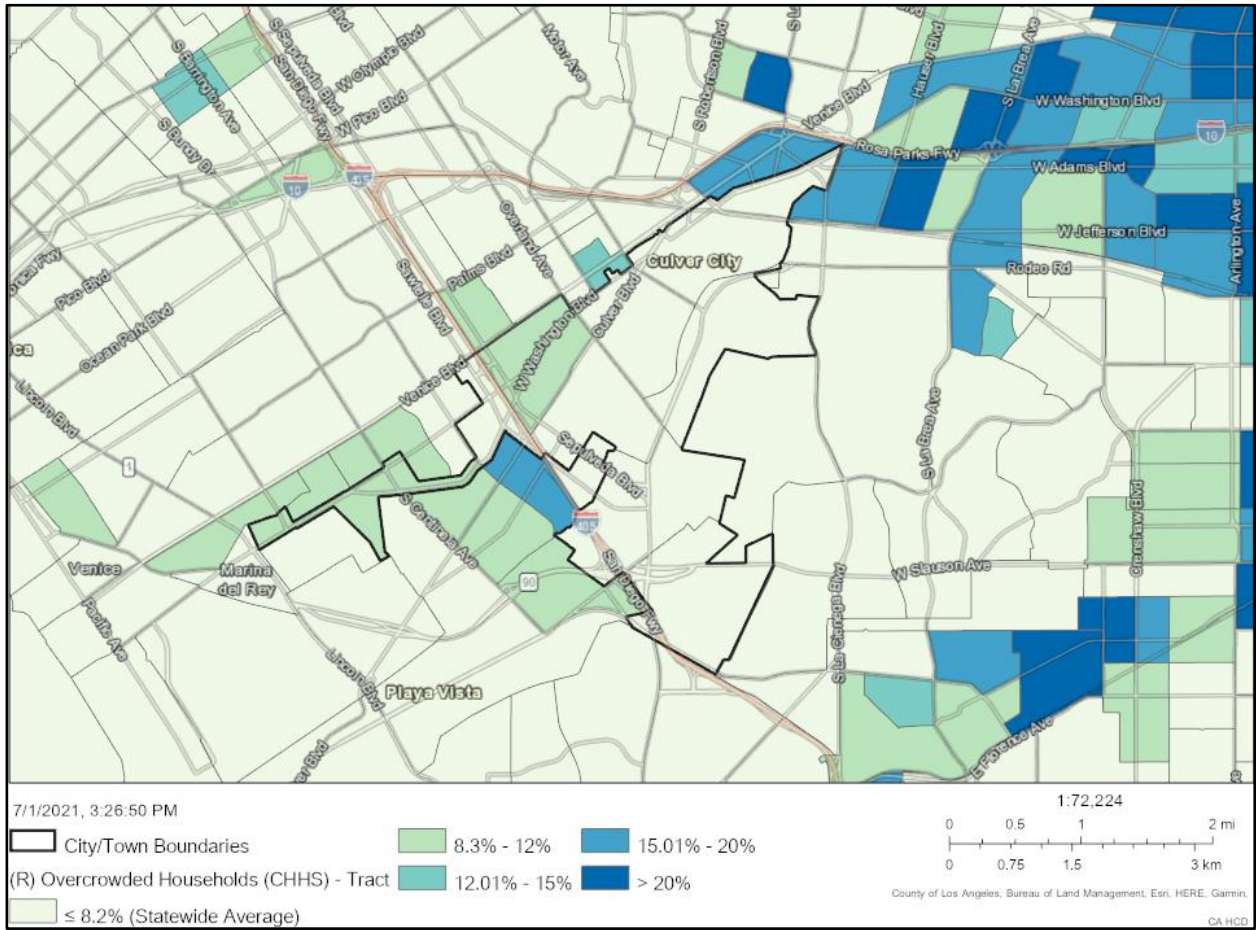
(B) SEVERELY OVERCROWDED HOUSEHOLDS BY CENSUS TRACT
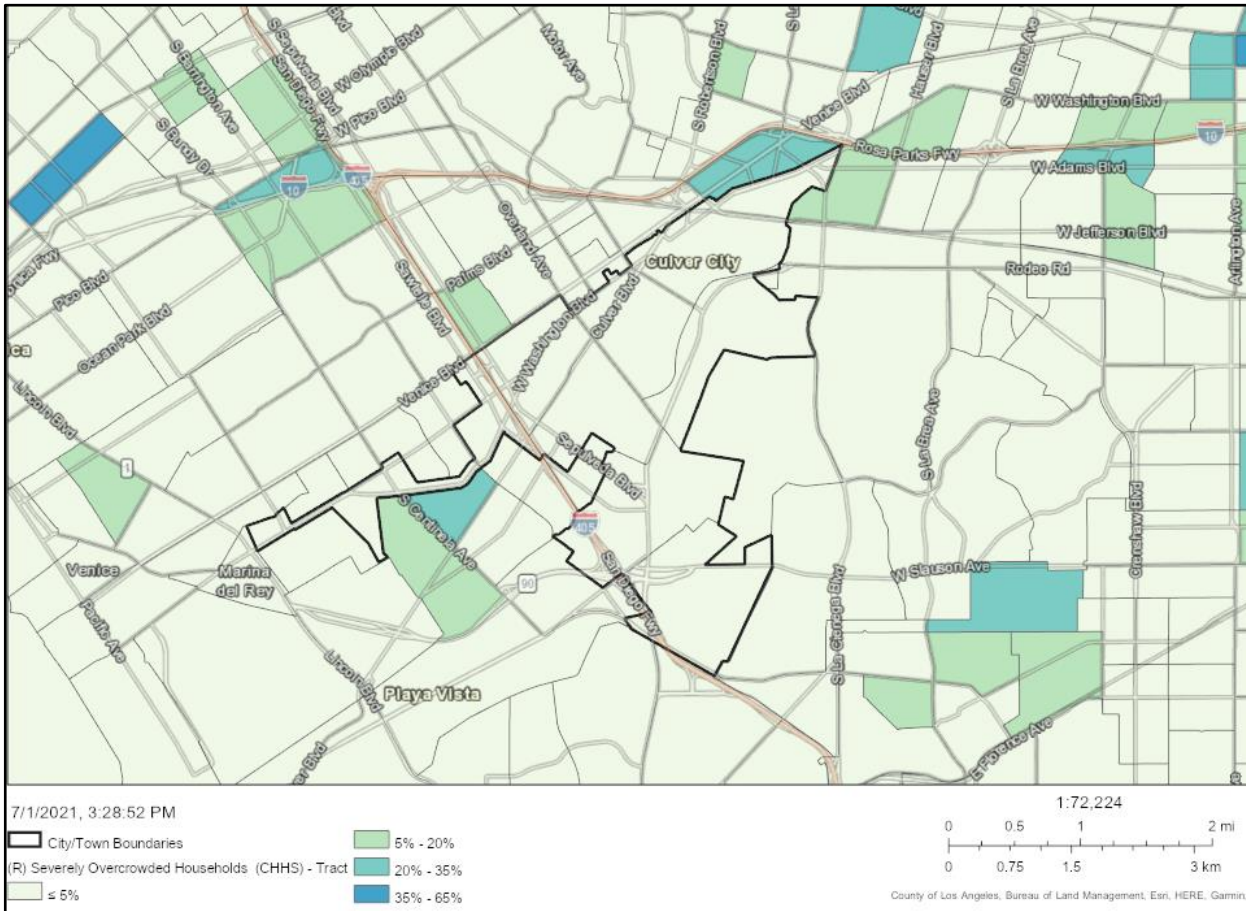
Source: HCD AFFH Data Viewer (2020 HUD CHAS data), 2021.

SUBSTANDARD HOUSING

Incomplete plumbing or kitchen facilities can be used to measure substandard housing conditions. In Culver City, 0.7% of owner-occupied households and 4.4% percent of renter-occupied households lack complete plumbing or kitchen facilities. Countywide, only 0.5% of owner-occupied households and 2.8% of renter-occupied households lack complete plumbing or kitchen facilities.

TABLE E-14: SUBSTANDARD HOUSING CONDITIONS

	Lacking Complete Kitchen or Plumbing Facilities		Total Households
	Households	Percent	
Culver City			
Owner-Occupied	60	0.7%	8,840
Renter-Occupied	339	4.4%	7,705
Los Angeles County			
Owner-Occupied	6,850	0.5%	1,512,365
Renter-Occupied	50,030	2.8%	1,782,835

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. According to the 2015-2019 ACS, approximately 92.4% of the housing stock in Culver City was built prior to 1990 and may be susceptible to deterioration compared to 85.9% Countywide (Table E-14). Tracts 7026, 7027, and 7028.02, located along the western City boundary, have the highest concentration of housing units built more than 50 years ago. Tracts 7028.01 and 7028.03, also located in the western corner of the City, have the highest concentration of new housing units built in 1990 or later.

TABLE E-15: SUBSTANDARD HOUSING CONDITIONS

Tract/Jurisdiction	1969 or Earlier (50+ Years)	1970-1989 (30-50 Years)	1990 or Later (<30 Years)	Total Units
7024	68.3%	22.0%	9.7%	2,056
7025.01	63.7%	31.7%	4.7%	2,214
7025.02	18.3%	77.8%	3.9%	2,170
7026	86.4%	9.5%	4.1%	2,369
7027	86.2%	6.1%	7.8%	1,322
7028.01	65.0%	21.0%	13.9%	2,259
7028.02	94.1%	3.6%	2.3%	912
7028.03	64.1%	23.4%	12.4%	1,229
7030.01	47.8%	44.0%	8.2%	3,307
Culver City	*62.6%*	*29.8%*	*7.6%*	*17,703*
Los Angeles County	*60.5%*	*25.4%*	*14.1%*	*3,542,800*

Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

DISPLACEMENT RISK 012

HCD defines sensitive communities as "communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost." The following characteristics define a vulnerable community:

- The share of very low income residents is above 20%; and

- The tract meets two of the following criteria:

    o   Share of renters is above 40%,

    o   Share of people of color is above 50%,

    o   Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median,

    o   They or areas in close proximity have been experiencing displacement pressures (percent change in rent above County median for rent increases), or

    o   Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

HCD has identified two vulnerable communities with populations that may be vulnerable to displacement in the event of increased redevelopment or drastic shifts in housing cost. These vulnerable communities are located on the western side of the City (Figure E-19). These tracts also have higher concentrations of racial/ethnic minorities, LMI households, and cost burdened renters (see Figure E-2, Figure E-6, and Figure E-17). These tracts also received lower jobs proximity index scores than the rest of the City (see Figure E-14). The tract in the far western corner is considered a moderate resource area (see Figure E-10).

#012

Posted by **JIll Vesci** on **07/30/2021** at **4:55pm** [Comment ID: 3500] - Link
Type: Missing
Agree: 1, Disagree: 0

the change of R1 with its intended goal of redevelopment of residential units along with an unzoning create the ideal conditions for accelerated displacement.   The AFFH section should analyze the potential impacts of   residential redevelopment on displacement. At a minimum the   housing element should disclose the anticipated rents or sales prices associated with the units that are anticipated under the proposed changes to the R1 zone

FIGURE E-19: SENSITIVE COMMUNITIES AT RISK OF DISPLACEMENT
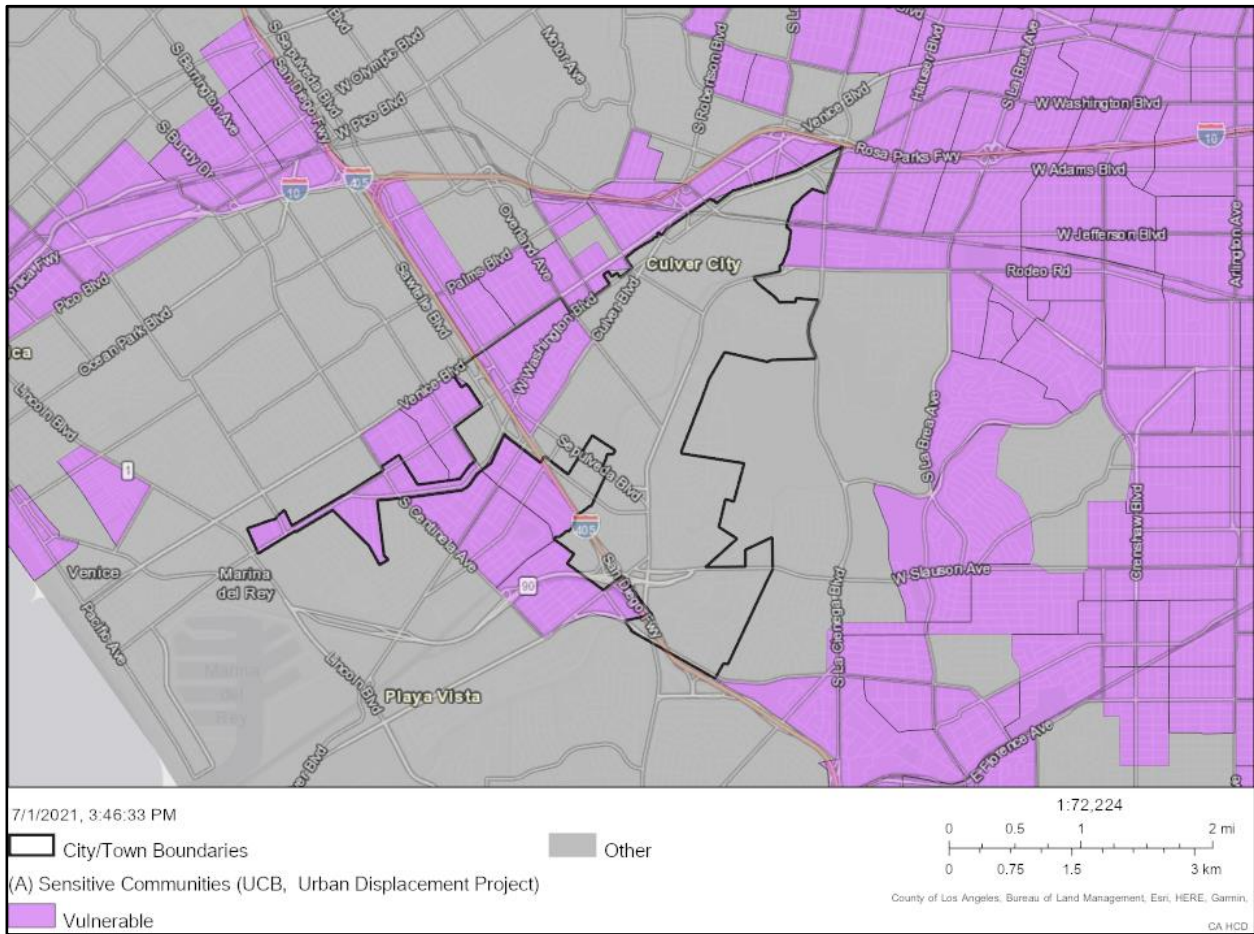
Source: HCD AFFH Data Viewer (2020 Urban Displacement Project), 2021.

6.   SUMMARY OF FAIR HOUSING ISSUES

Table E-16, below, shows a summary of the issues identified in this Assessment of Fair Housing. Fair housing issues are most concentrated in tracts on the western side of the City along the northwestern border, where there are higher concentrations of racial/ethnic minorities, LMI households, and cost burdened renters. These areas are also considered vulnerable communities at risk of displacement, and one of these tracts is categorized as a moderate resource area.

TABLE E-16: SUMMARY OF FAIR HOUSING ISSUES

Fair Housing Issue	Summary
Enforcement and Outreach	
Fair Housing Records	• HRC provides fair housing services, including outreach and education, to the Los Angeles Urban County including Culver City; however, no specific service records on Culver City are available. • During the 2019-2020 FY, HRC received 356 fair housing inquiries opened 83 housing discrimination cases; most of the discrimination cases were related to physical and mental disabilities. • Between January 2013 and March 2021, HUD received 26 FHEO inquiries from Culver City residents. • Less than 5% of renters in three Culver City tracts receive HCVs.
Integration and Segregation	
Race/Ethnicity	• Based on HUD's dissimilarity index, non-White and White communities in the Urban County are highly segregated. • 54% of Culver City residents belong to a racial/ethnic minority group, compared to 74% in the County. • The racial/ethnic minority population has grown since 2010 in most Culver City block groups. • A larger proportion of lower income RHNA units are in block groups with higher concentrations of racial/ethnic minorities compared to moderate and above moderate income units.
Disability	• 9.3% of Culver City residents experience a disability compared to 9.9% in the County. • A slightly larger share of lower income RHNA units are in tracts with larger populations of disabled persons compared to moderate and above moderate income units.
Familial Status	• 26.6% of Culver City households have one or more child; 4.9% are single-parent households and 3.4% are single-parent female-headed households. • More than 20% of children live in female-headed households in only two tracts in the City. • A larger proportion of lower income units are in tracts where over 80% of children are in married couple households and fewer than 20% of children are in female-headed households, compared to moderate and above moderate income units.
Income	• 32.4% of Culver City households earn less than 80% of the County AMI, compared to 51.6% countywide.

#013

Posted by **Meghan** on **07/27/2021** at **9:14pm** [Comment ID: 3440] - Link
Type: Question
Agree: 0, Disagree: 0

Administrator note: This document was reformatted and uploaded on 7/27/2021. The content of this draft has not been edited. As a result of the new document being uploaded, a comment left prior to 7/27 intended for this pinned location now appears on the next page and is duplicated here:

"But is this true (a) as a percent of population, and (b) within racial groups? My understanding is that black residents make up a smaller proportion of the population in Culver City than in 2010, and I'd love to see how that plays out in the block groups"

Fair Housing Issue	Summary
	• The western side of the City has higher concentrations of LMI households making up 50-75% of the population.
	• More lower income RHNA units are located in block groups where 50-75% of the population is LMI compared to moderate and above moderate income units.
Racially or Ethnically Concentrated Areas of Poverty	
Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)	• There are no R/ECAPs in Culver City; there are also no tracts categorized as areas of high segregation and poverty by the Fair Housing Task Force.
Racially/Ethnically Concentrated Areas of Affluence (RCAAs)	• Most Culver City tracts are predominantly White, but none have racial/ethnic minority populations below 20%.
	• Several block groups in the central and eastern sections of the City have median incomes exceeding $125,000.
	• None of the block groups in the City are considered RCAAs.
Access to Opportunities	
	• Urban County residents are less likely to be exposed to poverty and have better access to higher quality schools than residents countywide; environmental health is better in the Urban County for White, Black, and Native American residents, but worse for Hispanic and Asian residents.
	• Most tracts in Culver City are considered high and highest resource areas; the tract on the western end of the City is categorized as moderate resource.
	• A majority of low income RHNA units are in high resource areas, while a majority of moderate and above moderate income units are in highest resource areas.
Economic	• All of the tracts in the City scored in the highest quartile of economic scores.
Education	• Tracts on the eastern side of the City received higher education scores than the tract on the western side.
	• The tract with the lowest education score is considered a moderate resource area.
Environmental	• Tracts along the western, southern, and eastern City boundaries received environmental scores in the lowest quartile.
	• Tracts in the northern/central areas of the City received environmental scores between 0.25 and 0.50; all tracts in Culver City received lower environmental scores below 0.50.
Transportation	• Culver City received an All Transit Performance score of 8.8, higher than most surrounding jurisdictions and the County.
	• The eastern, southern, and central sections of the City have the highest jobs proximity indices between 80 and 100; the block groups on the western side of the City received slightly lower jobs proximity indices between 60 and 80.
	• Nearly all of Culver City is considered an HQTA.
Disproportionate Housing Needs	

#014

Posted by **Stephen Jones** on **07/23/2021** at **5:26pm** [Comment ID: 3358] - <u>Link</u>

Type: Question

Agree: 0, Disagree: 0

But is this true (a) as a percent of population, and (b) within racial groups? My understanding is that black residents make up a smaller proportion of the population in Culver City than in 2010, and I'd love to see how that plays out in the block groups.

Fair Housing Issue	Summary
	• 35.6% of owner households and 49.1% of renter households in Culver City have one or more housing problem
	• Hispanic renter-occupied households and Black owner-occupied households have the most housing problems in the City.
Cost Burden	• Black owner households and Hispanic renter households have the highest rate of cost burden in the City.
	• The proportion of cost burdened owners has decreased in most tracts since the 2010-2014 ACS.
	• The proportion of cost burdened renters has fluctuated throughout the City since the 2010-2014 ACS; two tracts on the western side of the City saw an increase in cost burdened renters from 40-60% to 60-80%.
Overcrowding	• 2.7% of owner households and 8.7% of renter households are overcrowded in Culver City.
	• The concentration of overcrowded households exceeds the Statewide average in two tracts on the western side of the City.
Substandard Housing Conditions	• Less than 1% of owner households and 4.4% of renter households lack complete plumbing or kitchen facilities in the City.
	• Culver City has an aging housing stock, where 92.4% of housing was built prior to 1990 compared to only 85.9% countywide.
	• Tracts along the western City boundary have the largest proportion of housing units built in 1969 or earlier.
Displacement	• Two tracts on the western side of the City are considered vulnerable communities at risk of displacement.

III. IDENTIFICATION AND PRIORITIZATION OF CONTRIBUTING FACTORS

The following are contributing factors that affect fair housing choice in Culver City.

1. LACK OF HOUSING OPPORTUNITIES IN HIGH RESOURCE AREAS AND HOUSING MOBILITY

Overpaying renters are most concentrated in two tracts in the western areas of Culver City. Fewer than 5% of renters in these all Culver City tracts receive HCVs despite the concentration of overpaying renters. The City lacks outreach and education methods to disseminate information about HCVs, including encouraging property owners to accept HCVs throughout the City, specifically in higher resource areas.

CONTRIBUTING FACTORS

- Lack of local private fair housing outreach and enforcement

- Lack of local public fair housing enforcement

  o Insufficient outreach and education efforts related to fair housing, being only a participant to the County's program

- Lack of resources for fair housing agencies and organizations

- Concentration of overpaying renters

2. DISPLACEMENT RISK OF LOW INCOME RESIDENTS DUE TO ECONOMIC PRESSURES 015

Tracts on the western side of the City are considered vulnerable communities at risk of displacement. This area also has higher concentrations of LMI households and cost burdened renters and is a lower opportunity area. Between 60% and 80% of renter households in this section of the City overpay for housing.

CONTRIBUTING FACTORS

- Displacement of residents due to economic pressures 016

- Land use and zoning laws

- Location and type of affordable housing

- Unaffordable rents

- Concentration of poverty in some tracts

- Availability of affordable housing

3. SUBSTANDARD HOUSING CONDITIONS

Approximately 0.7% of owner households and 4.4% of renter households in Culver City lack complete kitchen or plumbing facilities. Approximately 62.6% of the City's housing stock was built prior to 1970 (50+ years old), and over 90% was built prior to 1990 (30+ years old). Tracts along the western City boundary have the highest concentration of housing units aged 50 or older.

CONTRIBUTING FACTORS

- Age of housing stock

- Cost of repairs or rehabilitation

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

#015

Posted by **JIll Vesci** on **07/30/2021** at **2:52am** [Comment ID: 3472] - Link
Type: Suggestion
Agree: 1, Disagree: 0
There is no question that the proposal to modify R1 zoning in culver city will accelerate displacement. At present land costs are over $240 / sq. ft. Given the cost of construction, labor fees and permits there is no way that any of the proposed new "missing middle" units would sell for less $1.8 Million for the one bedroom condos or over $2 million for the two bedroom units. Rents would range from between $7,400 to $8,000. If anyone did a serious economic / real estate feasibility study on typologies presented in the housing element they would recognize that this proposal is almost a perfect machine to accelerate displacement in the community. Who will be displaced? Renters--yes there are renters in existing SFR units, the elderly and other members of protected classes. This proposal will ramp up economic pressures at the level of unit cost that no increase in supply in culver city would off set. Please before you go forward with this proposal please have some one conduct a real feasibility study on what the sales cost and implied rents of these units will be . the city is about to unleash a huge wave of displacement

#016

Posted by **JIll Vesci** on **08/04/2021** at **11:57am** [Comment ID: 3522] - Link
Type: Missing
Agree: 0, Disagree: 0
Address economic pressures and likely rent / housing cost effects of preferred alternative. Forecast / disclose effect on displacement

APPENDIX F: ACRONYMS

AB   Assembly Bill

AC   Acre

ADU   Accessory Dwelling Unit

AMI   Area Median Income

CDBG   Community Development Block Grant

CEQA   California Environmental Quality Act

CHS   Culver City Comprehensive Housing Strategy

CPD   HUD Community Planning and Development

CPI   Consumer Price Index

CUP   Conditional Use Permit

DFEH   State Department of Fair Employment and Housing

DOBI   Density or Other Bonus Incentive DOBI

DOF   California Department of Finance

DU   Dwelling unit

DU/AC   Dwelling Unit Per Acre

ELI   Extremely low income

ERAF   Educational Revenue Augmentation Fund

FAR   Floor area ratio

FHEO   U. S. Department of Fair Housing and Equal Opportunity

FMR   Fair market rent

FY   Fiscal Year

HCD   California Department of Housing and Community Development

HCV   Housing Choice Voucher

HMDA   Home Mortgage Disclosure Act

HOA   Homeowners Association

HOME   HOME Investment Partnership Act

HQS   Housing Quality Standards

HUD   U.S. Department of Housing and Urban Development

ILR   Improvement-to-Land Ratio

JADU   Junior Accessory Dwelling Unit

LACDA   Los Angeles County Development Authority

LAHSA   Los Angeles Homeless Services Authority

LBNC   Low Barrier Navigation Center

LMIHAF   Low/Moderate Income Housing Asset Fund

LTMB   Landlord-Tenant Mediation Board

MAP   Mortgage Assistance Program

MF   Multi-family

MTA   Metropolitan Transportation Authority

NPP   Neighborhood Preservation Program

PLHA   Permanent Local Housing Allocation

PMI   Private Mortgage Insurance

PSH   Permanent Supportive Housing

RAP   Rental Assistance Program

RHNA   Regional Housing Needs Assessment

SB   Senate Bill

SCAG   Southern California Association of Governments

SF   Single-family

TOD   Transit Oriented Development

UBH   Upward Bound House

VL   Very low income

VASH   Veterans Affairs Supporting Housing

WLAC   West Los Angeles Community College

017

#017

Posted by **Douglas Stanger** on **08/30/2021** at **4:18pm** [Comment ID: 3746] - Link

Type: Suggestion

Agree: 0, Disagree: 0

My general comments:

1) I could not see bubbles where other people have registered comments.

2) According to my calculations the city needs to add at least 1200 new units between now and 2045. That is approximately 50 units per year.

3) This amount is very achievable and we should be able to substantially exceed this amount.

4) There are significant opportunities to add housing along the major thoroughfares-Washington, Sepulveda and Venice Blvds. Developers are looking to build in these areas, and any new thoughtful developments would be an improvement over what we have now.

5) In addition there are other light industrial zones that should be factored in- such as the one located south of Sepulveda and Jefferson adjacent to the 405. The city of LA has built several apartment complexes on the opposite side of the 405 Freeway. We should do the same.

6) What about on the grounds of the Westfield Mall, which is for sale? Is that not where the future metro stop is planned for completion around 2045?

7) How about some housing on the grounds of West LA College?