

Chapter 6

2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)

UPDATE



October 2015

DRAFT

Chapter 6 **2015 ANALYSIS OF FAIR HOUSING CHOICE (AI) UPDATE**

OVERVIEW

The City has been actively engaged in alleviating impediments to fair housing choice since 1996. To this end, in October 2010 the City of Long Beach prepared a third generation AI to satisfy the requirements of the Housing and Community Development Act of 1974 (Act), as amended. This Act requires that any community receiving U.S. Department of Housing and Urban Development (HUD) grant funds [e.g., Community Development Block Grant (CDBG), HOME Investment Partnership, Emergency Solutions Grants (ESG)] affirmatively further fair housing. As a result, every five years, the City, as a federal entitlement community, has specific fair housing planning responsibilities, which include:

- Conducting an analysis of impediments to fair housing choice;
- Developing actions to overcome the effects of identified impediments to fair housing; and
- Maintaining records to support the jurisdiction's initiatives to affirmatively further fair housing.

The 2010 AI, which was completed and implemented starting grant year 2011, would have normally been replaced by a fourth generation AI by October 1, 2015. However, when HUD announced that it would publish new rules for the preparation of future AIs, the City opted to review and update the 2010 AI and postpone its scheduled new planning and analysis effort in order to follow HUD's development guidelines under the new rules. Thus the 2015 AI Update does not attempt to identify any new or redefine impediments to fair housing addressed in previous AIs. Instead, this 2015 AI Update focuses on the activities that have been undertaken or are proposed to be undertaken to address identified impediments. As such, only Chapter 6 of the 2015 AI Update has been altered from the 2010 AI. Chapter 6 evaluates the status of the identified potential impediments to fair housing vis-a-vis the stated actions. Until an assessment can be completed under the new rules, the City will continue to use the updated AI to implement the required actions. In addition, the City will continue to report the actions taken to overcome the effects of the identified impediments through the Consolidated Annual Performance Evaluation Report.

Future Activities

On July 16, 2015, the U.S. Department of Housing and Urban Development (HUD) released a final rule to equip communities receiving HUD funding with the data and tools needed to assess long-standing fair housing obligations in their use of HUD funds. HUD's rule clarifies and simplifies existing fair housing obligations for HUD grantees to analyze their fair housing landscape and set locally-determined fair housing priorities and goals through an Assessment of Fair Housing (AFH). To aid communities in this work, HUD will provide open data to grantees and the public on patterns of integration and segregation, racially and ethnically concentrated areas of poverty, disproportionate housing needs, and disparities in access to opportunity. This improved approach provides a better mechanism

for HUD grantees to build fair housing goals into their existing community development and housing planning processes. In addition to providing data and maps, HUD will also provide technical assistance to aid grantees as they adopt this approach. The new rules issued by HUD promulgate the “Affirmatively Furthering Fair Housing” (AFFH) regulation, which includes the following key provisions:

- Replace the AI with a more effective and standardized Assessment of Fair Housing (AFH) which grantees will use to identify and evaluate fair housing issues and factors contributing to fair housing issues;
- Improve fair housing assessment, planning, and decision-making using HUD provided data;
- Explicitly incorporate fair housing planning into existing planning processes, including the City’s Consolidated and Public Housing Agency Plans;
- Encourage and facilitate regional approaches to address fair housing issues; and
- Provide an opportunity for the public, including individuals historically excluded because of characteristics protected by the Fair Housing Act, to provide input about fair housing issues, goals, priorities, and the most appropriate uses of HUD funds.

According to the new rules, the due date for the first AFH is based on each grantees Consolidated Plan cycle or nine months after the release of the AFH’s assessment tools by HUD. Based on this timetable, the City’s AFH will be due 270 days before the City’s Con Plan due date of October 1, 2017 or January 4, 2017. To start the development process, staff has released a Request for Proposal (RFP) for consultant services to prepare an AFH pursuant to HUD guidelines and accordingly, contract start date is expected by the end of December 2016. In addition, staff will report back to the Board on the proposed work plan including a time line to achieve the various anticipated development milestones, such as public hearings, community meetings and noticing/publishing dates.

Chapter 6: Conclusions, Impediments, and Actions

The earlier chapters of this AI identify common problems and barriers to fair housing in Long Beach. This chapter builds upon the previous analysis, summarizes conclusions, and outlines the City's commitment to actions for addressing the impediments to fair housing. Potential impediments and actions include issues regarding discrimination, land use and public policies, fair housing accessibility, access to financing, housing market conditions, and fair housing complaints.

The chapter is comprised of the following three (3) sections:

- **6.1 Fully Addressed Conclusions and Impediments from 2001 AI:**

Key conclusions and potential impediments from the previous AI that have been fully addressed by the City of Long Beach.

- **6.2 Conclusions and Impediments Carried Over from 2001 AI to 2010 AI:**

Key conclusions and potential impediments carried over from the previous AI that have not been fully addressed by the City of Long Beach and may still exist.

- **6.3 Updated Conclusions and Impediments from 2010 AI Update:**

Based on the research and analysis conducted for the 2010 AI Update, the following is a list of updated conclusions and potential impediments that may exist in the City of Long Beach.

In each section, potential impediments are described and followed by proposed actions. Staff have evaluated and reviewed the status of the identified potential impediments to fair housing and provided updates following the City's Proposed Actions.

6.1 Fully Addressed Conclusions and Impediments from 2001 AI

The following is a list of key conclusions and potential impediments from the previous AI that have been fully addressed by the City of Long Beach (and are not carried further in the 2010 AI).

Impediment #1: Social Service Office

The use classification of Social Service Office (without food distribution) is used to require non-profit organizations to apply for a Conditional Use Permit (CUP) for offices for business transactions and service provision while other types of organizations (for-profit organizations) are not so required.

2001 AI Proposed Action(s):

- 1.1: The use classification of Social Service Office (without food distribution) should be amended so that it is treated identically to the use classification Professional Services.

Action(s) Taken: According to a letter dated March 9, 2004, from David Quezada, Director of HUD's Fair Housing Program Center, HUD does not consider this to be an impediment.

Impediment #2: Accessibility Requirements

The City of Long Beach presently makes no specific reference to the accessibility requirement contained in the 1988 amendment to the Fair Housing Act in its municipal code nor is there any provision monitoring compliance.

2001 AI Proposed Action(s):

- 2.1: The City of Long Beach planning and building codes should be amended to adopt the ICC Code Requirements for Housing Accessibility (CHRA) as part of its municipal code.

Action(s) Taken: The City enforces the 2007 California Building Code. This code ensures the highest available level of safety for residents and meets accessibility requirements of the ADA and Fair Housing Act.

The City now enforces the 2013 California Building Code, which is more comprehensive than the 2007 California Building Code.

6.2 Conclusions and Impediments Carried Over from 2001 AI to 2010 AI

The following is a list of key conclusions and potential impediments carried over from the previous 2001 AI that have not yet been fully addressed by the City of Long Beach and may still exist.

Demographics

Impediment #3: Racial/Ethnic and Income Concentration

While Whites make up 33.1% of the total population of the City, the eastern part of the city contains 17 census tracts in which Whites make up at least 75% of the total population of each census tract. However, this does not conclude that Fair Housing Impediments exist in the eastern part of Long Beach. When we track Fair Housing complaints over the last 10 years, we find incidents of discrimination are not exclusive to the eastern part of Long Beach but in fact have occurred citywide.

2001 AI Proposed Action(s):

- 3.1: The City of Long Beach and the Fair Housing Foundation should conduct an investigation within the 17 census tracts and determine whether such segregation is based upon discriminatory housing practices.

Action(s) Taken:

In May and June 2003, FHF conducted 21 in-depth citywide audits. The investigations consisted of scouting properties for vacancies and once identified, FHF's Director of Investigation sent two testers to each property. Both testers assumed the exact same profile with the exception of their individual race. The protected class was African American and the control class was Caucasian. Of the 21 audits, 12 showed no evidence of discrimination, 6 were inconclusive (suspicious but not conclusive), and 2 showed evidence of discrimination.

The City of Long Beach has facilitated the development of a variety of housing options throughout the City. Publicly assisted housing projects are required to implement Fair Housing Marketing Plans in order to provide equal access to housing for all.

According to a statewide ranking of White/Black and White/Asian dissimilarity indices based on 2000 Census data, the City of Long Beach has one of the highest rates of racial concentration in California. People's choice of residence today is complex. The quality of local schools, housing prices, access to transportation, access to specialized services, and affiliation with people or friends of similar values are all important factors guiding people's housing choices.

During the past 10 to 15 years, significant demographic changes have occurred in the City, with the racial and ethnic composition of City residents changing significantly. Today, Long Beach is more diverse than it was 20 years ago, with a smaller proportion of the City residents being White. Hispanic population has grown substantially in the City and the number and proportion of Black residents have also increased. The City expects the 2010 Census will show an even more diverse community. As demonstrated in Figure 12, virtually all Census Tracts in the City experienced a decrease in White population. Increases and decreases of Hispanic and Black populations were evidenced throughout the City, although more significantly in the Westside where more affordable rental housing is available.

Current Status: While Long Beach as a whole is an ethnically diverse community, patterns of ethnic concentration are present within particular areas. Concentrations of Hispanic residents are evident in numerous Long Beach neighborhoods, including the majority of Central Long Beach, Downtown, and North Long Beach, and to a lesser degree the Westside. The majority of neighborhoods with a concentration of Hispanic residents also exhibit concentrations of Black residents. Black residents typically reside in the City's upper West Side, and various portions in North Long Beach. Long Beach's Filipino population, traditionally settled in the West Side near the naval facilities, have now expanded across the Los Angeles River into the Wrigley neighborhood. The City's highest concentration of Cambodians has historically been at the Anaheim/Cherry Avenue core, but has now spread out into the neighborhoods surrounding this core. More recently, Cambodians have also begun relocating to

apartments in North Long Beach.

There exists in the City a high correlation between concentrations of minority residents and high levels of poverty, renter and owner overcrowding, and renter overpayment. Low- and moderate-income residents in Long Beach are generally located in the same geographic areas where there are concentrations of minorities. Approximately two-thirds of the White population living in Long Beach reside in Census Tracts where 50% or more of the residents are White, and 30 of the 36 Census tracts where this is the case lie within the eastern part of the City. These eastern Census tracts with concentrations of Whites also evidence the highest median incomes and highest for-sale housing values in Long Beach.

2010 AI Proposed Action(s):

- 3.1: The City, in conjunction with FHF, will continue to conduct in-depth audit testing of housing practices within applicable areas. The areas will be selected for investigation based on housing discrimination data.

Time Frame: Ongoing.

3.1 A: Fair Housing Foundation continues to be contracted by the City to develop innovative forms of audit testing as a means to address current fair housing concerns. With discrimination against the disabled community being the largest identified group in the nation as well as in the City, FHF uses an Accommodation and Modification 101 Audit Workshop to empower housing providers with the education and knowledge to address the concerns and understand their responsibilities regarding those with disabilities. These workshops address protected classifications, definitions of life activities and impairments, what is reasonable and necessary, difference between an accommodation and modification, examples of common accommodations and modification, verification of a disability, construction requirements, and hoarding.

- 3.2: The City will continue to contract with FHF to provide fair housing services that will include, but not be limited to: Discrimination Complaint Intake and Investigation, Outreach and Education, and, General Housing (Landlord/Tenant) Counseling. Materials provided will be available in English, Spanish, and Khmer. Outreach and Education will be targeted to: 1) populations likely to experience discrimination or be underrepresented, 2) housing providers, and 3) the general public.

Time Frame: Ongoing.

3.2 A: The following actions are occurring:

- The City contracts with FHF to provide fair housing services that will include the following services to affirmatively further fair housing: fair housing complaint intake, investigation, resolution, general housing (tenant/landlord) counseling, mediations, assistance, referrals, resolution, education, and outreach activities throughout the City emphasizing target populations likely to experience discrimination, underrepresented communities, housing providers, and the general public.
- FHF staff provides direct client services in English, Spanish, Vietnamese and American Sign Language, and interpreting services in real time for 86 additional languages.

- City staff is implementing a Language Access Policy approved by City Council on August 13, 2013. The policy establishes standards and procedures for providing equal access to City services and programs to all residents, including Spanish, Khmer, and Tagalog speakers who have limited proficiency in English.
- The Proactive Rental Housing Inspection Program (PHRIP) was adopted in accordance with the 2013-2021 Housing Element. PHRIP aims to maintain livability standards, protect against blight, and secure Citywide compliance through efficient and effective enforcement of the Long Beach Municipal Code. The program provides tenants a list of resources including information on the Apartment Association-California Southern Cities, City of Long Beach Code Enforcement, Fair Housing Foundation, Housing Long Beach, Legal Aid Foundation of Long Beach, and the Los Angeles County Bar Association's Center for Civic Mediation.

3.3: FHF will adopt "Diversity" as the theme for the annual Poster Contest and increase involvement to middle schools and high schools.

Time Frame: April 2010.

3.3 A: FHF held their 50th Fair Housing Poster Contest and Reception on April 22, 2015. Although the event changes year to year, the theme of Diversity remains constant and will continue. Examples in recent years have included: Open Neighborhood, Completing the Puzzler, Building a Stronger Community, Open Minds create Open Doors, and Opening Doors – Unlocking Dreams. Regionally over 600 schools receive invitations to participate in the annual poster contest. In the Long Beach Unified School District all 64 schools, with students in the 4 to 8th grades, are invited annually to participate.

3.4: In 1998, the City established the Human Dignity Program, which demonstrates the City's commitment to embracing and valuing cultural diversity. The Program helps prevent youth and gang violence, educates the community about cultural awareness and inclusion, responds to hate crimes and tensions before they escalate, mediates inter-cultural conflicts, and promotes community harmony. The City and its Human Dignity Program (HDP) will work with FHF to organize an event to be held in the month of April. The event will promote community awareness towards celebrating racial, cultural, and social diversity, and education regarding all aspects of housing.

Time Frame: June 2010 (see also Impediment #15).

3.4 A:

- The City will continue to contract with FHF to provide fair housing services that will include the following services to affirmatively further fair housing: fair housing complaint intake, investigation, resolution, general housing (tenant/landlord) counseling, mediations, assistance, referrals, resolution, education, and outreach activities throughout the City emphasizing target populations likely to experience discrimination, underrepresented communities, housing providers, and the general public. FHF holds the Fair Housing Reception and Poster Contest annually in April, Fair Housing Month. Many agencies in the housing field also conduct special events in

Land Use and Public Policies

Impediment #4: Special Use Permits

The Zoning Code distinguishes Senior Citizen Housing and Handicapped Housing from other Single-Family Residential and Multi-Family Residential uses by the application of a conditional use permit. This distinction can become discriminatory against persons protected by the classes of disabilities and family status as defined by the Fair Housing Act as amended in 1988 and California Assembly Bill 2244 when their housing and related services are subjected to the Conditional Use Permit requirements not equally imposed on similar Single-Family Residential and Multi-Family Residential uses.

2001 AI Proposed Action(s):

- 4.1: The residential use classifications of Senior Citizen Housing and Handicapped Housing should be amended so that they are treated identically to other Single-Family Residential and Multi-Family Residential uses.

Action(s) Taken: The Zoning Code process began through the preparation of the City's Housing Element in order to amend the Zoning Code.

Current Status: The City's Housing Element has been completed which addresses this zoning issue.

2010 AI Proposed Action(s):

- 4.1: As part of the City's Housing Element update, the City will be addressing the provision of housing for persons with disabilities, including transitional and supportive housing. The City will amend the Zoning Code to differentiate transitional or supportive housing that operates as group residence versus transitional or supportive housing that is regular rental apartments. For transitional and supportive housing meeting the statutory definitions of the Health and Safety Codes, such housing will be permitted by right in the City where residential uses are permitted. For transitional and supportive housing operating as group housing facilities, meeting the statutory definition of residential care facilities under the Lanterman Disability Services Act, such facilities will be permitted according to the City's Zoning Code provisions for residential care facilities.

Under California housing laws, senior housing is eligible for a range of density bonus, incentives, and regulatory concessions. Therefore, a special use permit process is appropriate to determine the appropriate bonus, incentives, and concessions.

Time Frame: Revise the Zoning Code to address transitional and supportive housing by August 2010.

4.1.A: The residential use classification for Senior Citizen Housing and Handicapped Housing in the Zoning Code will be updated in July 2016.

Impediment #5: Senior Citizen Housing

The Zoning Code distinguishes Senior Citizen Housing from other similar Multi-Family Residential uses by the application of a conditional use permit.

2001 AI Proposed Action(s):

5.1: The residential use classifications of Senior Citizen Housing should be amended so that they are treated identically to other similar Single-Family Residential and Multi-Family Residential uses.

Action(s) Taken: The Zoning Code process began through the preparation of the City’s Housing Element in order to amend the Zoning Code.

Current Status: The City’s Housing Element has been completed which addresses this zoning issue.

2010 AI Proposed Action(s):

5.1: See Impediment #4.

Time Frame: See Impediment #4.

5.1. A: The residential use classification for Senior Citizen Housing and Handicapped Housing in the Zoning Code will be updated in July 2016.

Impediment #6: Handicapped Housing

The Zoning Code distinguishes Handicapped Housing from other similar Single-Family and Multi-Family Residential uses by the application of a conditional use permit.

2001 AI Proposed Action(s):

6.1: The residential use classifications of Handicapped Housing should be amended so that they are treated identically to other similar Single-Family Residential and Multi-Family Residential uses.

Action(s) Taken: The Zoning Code process began through the preparation of the City’s Housing Element in order to amend the Zoning Code.

Current Status: The City’s Housing Element has been completed which addresses this zoning issue.

2010 AI Proposed Action(s):

6.1: See Impediment #4.

Time Frame: See Impediment #4.

6.1.A: The residential use classification for Senior Citizen Housing and Handicapped Housing in the Zoning Code will be updated in July 2016.

Impediment #7: VisitAbility

VisitAbility is a nationwide movement endorsed by HUD to enhance the user-friendliness of all housing to include the needs of everyone, regardless of their physical abilities.

2001 AI Proposed Action(s):

7.1: The City of Long Beach should adopt a “VisitAbility Ordinance” calling for new housing construction in the City that uses public financial assistance to meet minimal visitability standards.

Action(s) Taken: The City adopted a VisitAbility Ordinance in 2002.

Current Status: The purpose of the VisitAbility Ordinance is to provide regulations which will make certain dwelling units visitable by disabled persons. The Ordinance applies to all new residential development and requires housing units to have accessible entrances, routes within the dwelling unit, and bathrooms.

2010 AI Proposed Action(s):

7.1: The City will be exploring incentives to promote universal design principles.

Time Frame: Explore incentives in 2010 (see also Impediment #23).

7.1.A: After the adoption of the City's new Land Use and Urban Design Elements, the City will include universal design principles and guidelines in the Zoning Code, as a standalone document, or both.

As stated in the City's 2013-2021 Housing Element, the City will evaluate the feasibility of providing additional density bonuses or other incentives for new development that includes universal design (beyond required ADA standards) by 2017 as part of the tri-annual update of the Building Code.

Impediment #8: Emergency Shelters

The Zoning Code does not define or incorporate emergency shelters as a use classification in existing zones.

2001 AI Proposed Action(s):

8.1: The Zoning Code should be amended to include a definition of emergency shelters and be incorporated as a use classification and treated similar to other use classifications with similar characteristics.

Action(s) Taken: The Zoning Code was amended to address emergency shelters.

Current Status: Emergency shelters for the homeless are currently permitted via a Conditional Use Permit for no more than six persons in two Community Commercial Districts (CCR and CCN).

2010 AI Proposed Action(s):

8.1: The City will amend the Zoning Code to permit emergency shelters by right via a ministerial approval process in the Port – IP zone and in PD-31 (Villages at Cabrillo). Increase the shelter bed capacity at the Villages at Cabrillo to allow at least 100 additional efficiency units. The Zoning Code will be amended to ensure adequate capacity to shelter the unsheltered bed gap (380 individuals, 72 persons in families with children) in both the Villages at Cabrillo and the IP zone. The Zoning Code amendment will establish specific development standards and the following performance standards for emergency shelters: maximum number of beds; proximity to other shelters; length of stay; off-street parking standards to be the same as other residential uses within the same zone; size and location of exterior and interior waiting drop-off; security and lighting; and provision of on-site management. These standards will not be different than standards established for similar uses in the same zones.

Time Frame: Amend Zoning Code by August 2010.

8.1.A: In 2013, the City amended the Zoning Code to permit emergency shelters by right via a ministerial approval process in the IP- Port Zoning District and in PD-31-Villages at Cabrillo. The City will explore additional opportunities for allowing emergency shelters in PD-29 and the IL (Light Industrial) zone. Potential inclusion of sites for emergency shelters will be evaluated as part of the PD-29 Specific Plan update in 2016. Inclusion of emergency shelters in the IL zone or as an overlay in portions of the IL zone will be recommended in 2016.

Impediment #9: Transitional Housing

The Zoning Code does not define or incorporate transitional housing as a use classification in existing zones.

2001 AI Proposed Action(s):

9.1: The Zoning Code should be amended to include a definition of transitional housing and be incorporated as a use classification and treated identically to similar single- family residential and multi-family residential uses.

Action(s) Taken: The Zoning Code process began through the preparation of the City's Housing Element in order to amend the Zoning Code.

Current Status: The City's Housing Element has been updated which addresses this zoning issue.

2010 AI Proposed Action(s):

9.1: See Impediment #4.

Time Frame: See Impediment #4.

9.1. A: As an initial step to incorporate transitional housing as a use classification, on June 16, 2015, the Long Beach City Council adopted an ordinance adding a definition of transitional housing to the Zoning Code. The specific changes incorporating transitional housing as a use classification will occur with a Zoning Code update after the adoption of the new Land Use Element of the General Plan.

Fair Housing Issues

Impediment #10: Housing Vacancies

Based on scouting for rental vacancies and audits of rental housing, a significant number of rental vacancies are advertised only in Spanish or Khmer creating a barrier to fair housing choice for households that do not speak these languages.

2001 AI Proposed Action(s):

10.1: The City of Long Beach and the Fair Housing Foundation should conduct a targeted citywide education campaign and intensify efforts to provide training and counseling to educate property owners and managers about potential housing discrimination and their obligations under Fair Housing Laws. Such training should emphasize the need to advertise and communicate to consumers in English as well as

other language(s) spoken in the community.

Action(s) Taken: Each year the FHF provides Public Service Announcements (PSAs) to various media services including newsprint and television media. The PSA for television media was produced by the National Fair Housing Alliance, entitled “Fair Housing – It’s the Law Video.”

In May 2003, FHF provided the City with information for the City’s official website, and since then fair housing information is available on the City website (http://lbs.info/housing_and_community_improvement/homebuyer_programs).

In June 2003, FHF developed a “What is Fair Housing” tri-fold literature in English, Spanish and Khmer. This revision included discrimination based on national origin, familial status, and advertising. FHF continued to distribute this brochure in Long Beach.

In August 2003, FHF launched its own official website at www.fairhousingfoundation.com.

Current Status: The City has an Affirmative Fair Housing Marketing Plan that outlines the procedures that are to be followed in selecting tenants for HOME Program Assisted Projects in the City of Long Beach. Under this Plan, Owners are encouraged to undertake certain marketing efforts aimed at creating awareness in the general public and certain community groups as to the availability of apartments for rent. These marketing efforts can include, but are not limited to, promotional brochures, newspaper advertising, billboards, mass mailings, public relations, radio advertising and cable television advertising. It is also encouraged all written material to be provided in English, Spanish, Khmer, and Tagalog.

2010 AI Proposed Action(s):

10.1: The City will continue to contract with FHF to provide fair housing services that will include, but not be limited to: Discrimination Complaint Intake and Investigation, Outreach and Education, and, General Housing (Landlord/Tenant) Counseling. Materials provided will be available in English, Spanish, Khmer, and Tagalog. Outreach and Education will be targeted to: 1) populations likely to experience discrimination or be underrepresented, 2) housing providers, and 3) the general public.

Time Frame: Ongoing.

10.1A: The City will continue to contract with FHF to provide fair housing services that will include the following services to affirmatively further fair housing: fair housing complaint intake, investigation, resolution, general housing (tenant/landlord) counseling, mediations, assistance, referrals, resolution, education, and outreach activities throughout the City emphasizing target populations likely to experience discrimination, underrepresented communities, housing providers, and the general public.

Impediment #11: Black Households

Based on a random audit of rental housing conducted over the last five years, African Americans face significant obstacles to fair housing choice in the City of Long Beach.

Based on client data collected by the Fair Housing Foundation, Black/African American households face a disproportionate number of fair housing issues in the City of Long Beach. Black/African American households, which represent 14.5% of the City's total population, represented 36.7% of the clients reporting housing complaints or concerns and filed 45% of the housing discrimination complaints.

2001 AI Proposed Action(s):

11.1: The City of Long Beach and the Fair Housing Foundation should conduct a citywide investigation into potential discriminatory housing practices faced by African Americans.

Action(s) Taken: In May and June 2003, FHF conducted 21 in-depth citywide audits. The investigations consisted of scouting properties for vacancies and once identified, FHF's Director of Investigation sent two testers to each property. Both testers assumed the exact same profile with the exception of their individual race. The protected class was African American and the control class was Caucasian. Of the 21 audits, 12 showed no evidence of discrimination, 6 were inconclusive (suspicious but not conclusive), and 2 showed evidence of discrimination.

FHF developed an African American Interview Survey tool. The survey was designed to identify pattern and practices of discrimination faced by African Americans. It included obtaining information on the client's gender, female head of household status, whether or not they had ever been discriminated against in housing and/or housing choices based on their race, if yes was it based on denial of access, harassment, or differential treatment, who discriminated against them i.e., the landlord or owner, what type of housing was it, and the types of discrimination i.e., refused assistance, refused maintenance, restrictive rules, whether or not the client reported the incident and if the incident was resolved to their satisfaction. During the months of June and July 2004, during the intake process for all general housing and discrimination clients, all clients reporting their race as African American were asked if they would participate in an anonymous interview survey. A total of 96 African Americans participated in the Survey with the following results:

Gender:

- o 68 (71%) Female, 28 (29%) Male

Female head of household:

- o 46 (48%)

Discriminated against in housing and/or housing choice:

- o 58 (60%) Stated they had been discriminated against in housing choice based on their race

How were they discriminated against:

- o 38 (63%) received differential treatment as an in-place tenant
- o 12 (21%) were denied housing or choice of housing
- o 8 (16%) were harassed as an in-place tenant

Who discriminated against them:

- o 34 (58%) were discriminated against by the landlord/manager
- o 19 (33%) were discriminated against by the owner
- o 8 (8%) were discriminated against by the management company

Type of housing:

- 47 (81%) were seeking or living in a non-subsidized apartment
- 9 (16%) were living in subsidized housing
- 2 (3%) were seeking housing in a single family residence

Did they report the incident:

- 33 (56%) reported the incident to FHF or the Department of Fair Employment and Housing
- 25 (44%) did not report the incident

Follow-up:

In both audits where evidence of discrimination was found, it was based on testers receiving different levels of information. As with all educational audits, FHF's first course of action is to speak with the owner and/or manager first in hopes of education on fair housing laws. In both cases FHF was successful in conciliating these cases with the on-site managers attending a four-hour Certificate Fair Housing Training to Housing Providers. Both managers passed and received their certificates.

With 63% percent of incidents of discrimination occurring with in-place tenants, FHF strongly believes that racial discrimination against African Americans is still as rampant as 20 years ago, only less blatant in the form of harassment rather than denial of access. Therefore it is recommended that the City institute a requirement of all property owners and their managers that fair housing education be received as a condition of their business license.

Current Status: From July 1, 2003 through June 30, 2008, the Fair Housing Foundation (FHF) received 909 complaints alleging housing discrimination in Long Beach. Blacks accounted for 46% of these complaints (415 complaints). Typically not all allegations of housing discrimination result in a fair housing case. Of the FHF's 156 race-based fair housing cases from 2003 to 2008, 60 cases (50%) were brought by Blacks; however, the 2000 Census reported that only 15% of Long Beach residents are Black. What is of particular concern is that evidence of discrimination was found in 48% of these cases, whereas only 33% of race cases brought by Whites and 15% of race cases brought by Hispanics were found to have evidence.

2010 AI Proposed Action(s):

11.1 : The City will continue to contract with FHF to provide fair housing services that will include, but not be limited to: Discrimination Complaint Intake and Investigation, Outreach and Education, and, General Housing (Landlord/Tenant) Counseling. Materials provided will be available in English, Spanish, and Khmer. Outreach and Education will be targeted to: 1) populations likely to experience discrimination or be underrepresented, 2) housing providers, and 3) the general public.

Time Frame: Ongoing.

11.1A: The City will continue to contract with FHF to provide fair housing services that will include the following services to affirmatively further fair housing: fair housing complaint intake, investigation, resolution, general housing (tenant/landlord) counseling, mediations, assistance, referrals, resolution, education, and outreach activities throughout the City emphasizing target populations likely to experience discrimination, underrepresented communities, housing providers, and the general

public.

11.2 : When mailing the invoices for business license renewal for rental properties, include information on fair housing rights and responsibilities, and opportunities and resources for fair housing training.

Time Frame: Ongoing.

11.2A: Information on fair housing rights and responsibilities, and opportunities and resources for fair housing training is provided to residents when applying for the City's Home Improvement Rebate Program. Fair housing information and resources are also available through the Neighborhood Resource Center.

Impediment #12: Female-Headed Households

Based on client data collected by the Fair Housing Foundation, female-headed households face a disproportionate number of housing issues in the City of Long Beach. Female-headed households represented 16.1 percent of the City's total population and 48.6 percent of households reporting housing concerns or complaints.

2001 AI Proposed Action(s):

12.1: The City should conduct a special review of the housing concerns or complaints specifically faced by female-headed households and develop remedies to address the problems.

Action(s) Taken: FHF developed a Female Head of Household Survey tool. The survey was designed to identify pattern and practices of discrimination faced by female-headed households. It included obtaining information on whether or not they had ever been discriminated against in housing and/or housing choices based on their female-headed household status, if yes was it based on denial of access, harassment, or differential treatment, who discriminated against them i.e., the landlord or owner, what type of housing was it, and the types of discrimination i.e., refused assistance, refused maintenance, restrictive rules, whether or not the client reported the incident and if the incident was resolved to their satisfaction. During the months of June and July 2004, during the intake process for all general housing and discrimination clients, all clients reporting themselves as female head of household were asked if they would participate in an anonymous interview survey. A total of 57 Female-headed Households participated in the Survey with the following results:

Discriminated against in housing and/or housing choice:

- 40 (70%) Stated they had been discriminated against in housing choice based on their household status

How were they discriminated against:

- 24 (60%) received differential treatment as an in-place tenant
- 12 (30%) were denied housing or choice of housing
- 4 (10%) were harassed as an in-place tenant

Who discriminated against them:

- 26 (65%) were discriminated against by the landlord/manager
- 10 (25%) were discriminated against by the owner
- 2 (5%) were discriminated against by the management company
- 2 (5%) were discriminated by other

Type of housing:

- 30 (75%) were seeking or living in a non-subsidized apartment
- 8 (20%) were seeking housing in a single family residence
- 2 (5%) were living in subsidized housing

Did they report the incident:

- 14 (35%) reported the incident to FHF or the Department of Fair Employment and Housing
- 26 (65%) did not report the incident

FHF developed the protocol, methodology, and tools for a focus group to address concerns faced in housing by female-headed households as well as a flyer announcing the dates for the focus group. The flyer was mailed to 802 female clients serviced by FHF during the 2003/2004 year. The focus groups were scheduled for Thursday, August 26, 2004 from 6:00 p.m. to 8:00 p.m. at the Cesar E. Chavez Park, and Saturday, August 21, 2004 from 10:00 a.m. to 12:00 p.m. at the Long Beach Main Library. There was no attendance at either focus group.

In September 2004 FHF developed topic specific literature for female-headed households. The literature explains the rights of female-headed households, examples of illegal housing discrimination, examples of harassment, and remedies available. FHF has distributed 1,258 pieces of the topic specific literature in the last 8 months.

Follow-up:

With 70% percent of incidents of discrimination occurring with in-place tenants, FHF again recommends that the City institute a requirement of all property owners and their managers that fair housing education be received as a condition of their business license.

Current Status: From July 1, 2003 through June 30, 2008, the Fair Housing Foundation (FHF) received 909 complaints alleging housing discrimination in Long Beach. Female-headed households accounted for 35% of these complaints (322 complaints). Typically not all allegations of housing discrimination result in a fair housing case. Of the FHF's 322 discrimination complaints from 2003 to 2008, 157 resulted in actual cases. However, according to the 2000 Census, there were 17,620 female-headed households with children in Long Beach, making up just 11 percent of total households in the City. Female-headed households continue to face a disproportionate number of housing issues in the City of Long Beach.

2010 AI Proposed Action(s):

- 12.1 The City will continue to contract with FHF to provide fair housing services that will include, but not be limited to: Discrimination Complaint Intake and Investigation, Outreach and Education, and, General Housing (Landlord/Tenant) Counseling. Materials provided will be available in English, Spanish, and Khmer. Outreach and Education will be targeted to: 1) populations likely to experience discrimination or be underrepresented, 2) housing providers, and 3) the general public.

Time Frame: Ongoing

12.1.A: The City will continue to contract with FHF to provide fair housing services that will include the following services to affirmatively further fair housing: fair housing complaint intake, investigation, resolution, general housing (tenant/landlord) counseling, mediations, assistance, referrals, resolution, education, and outreach activities throughout the City emphasizing target populations likely to experience discrimination, underrepresented communities, housing providers, and the general public. FHF has continued to specifically emphasize Education and Outreach Activities to communities and organizations which target and include Female Headed-Households.

12.2 : When mailing the invoices for business license renewal for rental properties, include information on fair housing rights and responsibilities, and opportunities and resources for fair housing training.

Time Frame: Ongoing.

12.2A: Information on fair housing rights and responsibilities, and opportunities and resources for fair housing training is provided to residents when applying for the City's Home Improvement Rebate Program. Fair Housing information and resources are also available through the Neighborhood Resource Center.

Impediment #13: Asian and Hispanic Households

Based on client data collected by the Fair Housing Foundation, Asian and Hispanic/Latino households are underrepresented among those reporting housing concerns or complaints. Asians represent 13.1% of the City's total population and only 1.9% of households reporting housing concerns or complaints and Hispanics/Latinos represent 35.8% of the City's total population and 23.8% of households reporting housing concerns or complaints.

2001 AI Proposed Action(s):

13.1: The City of Long Beach and the Fair Housing Foundation should conduct an expanded effort to promote tenant rights and fair housing laws to Asian and Hispanic/Latino households in English, Spanish and appropriate Asian languages.

Action(s) Taken: Each year the FHF provides Public Service Announcements (PSAs) to various media services including newsprint and television media. The PSA for television media was produced by the National Fair Housing Alliance, entitled "Fair Housing – It's the Law Video."

In May 2003, FHF provided the City with information for the City's official website, and since then fair housing information is available on City website.

In June 2003, FHF developed a "What is Fair Housing" tri-fold literature in English, Spanish and Khmer. This revision included discrimination based on national origin, familial status, and advertising. FHF continued to distribute this brochure in Long Beach.

In August 2003, FHF launched its own official website at www.fairhousingfoundation.com.

Current Status: From July 1, 2003 through June 30, 2008, the Fair Housing

Foundation (FHF) received 909 complaints alleging housing discrimination in Long Beach. Asian households accounted for 3% of these complaints (26 complaints) and Hispanic/Latino households accounted for 23% of these complaints (210 complaints). According to American Community Survey data, the racial/ethnic distribution of Long Beach residents between 2005 and 2007 is as follows: 40% Hispanic, 30% White, 14% Black, 13% Asian, and 3% Other. Asian and Hispanic/Latino households continue to be underrepresented among those reporting fair housing concerns or complaints.

2010 AI Proposed Action(s):

13.1: The City will continue to work with FHF to provide fair housing services that will include, but not be limited to: Discrimination Complaint Intake and Investigation, Outreach and Education, and, General Housing (Landlord/Tenant) Counseling. Materials provided will be available in English, Spanish, and Khmer. Outreach and Education will be targeted to: 1) populations likely to experience discrimination or be underrepresented, 2) housing providers, and 3) the general public.

Time Frame: Ongoing.

13.1. A: The following actions are occurring:

- The City will continue to contract with FHF to provide fair housing services that will include the following services to affirmatively further fair housing: fair housing complaint intake, investigation, resolution, general housing (tenant/landlord) counseling, mediations, assistance, referrals, resolution, education, and outreach activities throughout the City emphasizing target populations likely to experience discrimination, underrepresented communities, housing providers, and the general public. FHF's 2007 Strategic Plan included a primary goal to Increases Services to Underserved Communities with an Objective of Increasing Multilingual Capabilities and Services. FHF has 50 years of commitment and experience working for the City as the fair housing service provider. Staff at FHF provide direct client services in English, Spanish, Vietnamese and American Sign Language, and interpreting services in real time for 86 additional languages. In 2014-2015, 87.3% of households provided with fair housing services were fluent in English. The remaining languages which services were provided in were 10.6% Spanish, with the remaining at less than 1.0% each Khmer, ASL, Vietnamese, and Mandarin.
- City staff is implementing a Language Access Policy approved by City Council on August 13, 2013. The policy establishes standards and procedures for providing equal access to City services and programs to all residents, including Spanish, Khmer, and Tagalog speakers who have limited proficiency in English.

Access to Financing

Impediment # 14: Conventional Home Loan Financing

An examination of year 2000 HMDA data show a noticeable gap citywide in home loan origination and denial rates between White applicants and minority applicants favoring White applicants.

2001 AI Proposed Action(s):

14.1: The City of Long Beach should conduct a detailed examination and analysis of home mortgage lending patterns and practices in the residential credit market to

determine if there is a pattern and practice of discriminatory lending and/or redlining taking place in the City.

Action(s) Taken: A more detailed analysis of lending patterns was conducted as part of the 2010 AI Update. See discussions below and in earlier chapters.

Current Status: The racial and ethnic disposition of conventional home loan applications in Long Beach was fairly reflective of the City's demographics. Among ethnic groups, Hispanics had the highest proportion of loan applications, with just over 34% of total applications, followed by Blacks with 11%, and Asians with 10%. The high proportion of applications from Hispanics is consistent with the large Hispanic population in the community. White households, however, comprised only 33% of the City's population in 2000 but accounted for about 40% of all loan applications in 2007.

Whites had the highest approval rates among all income groups in 2003 and 2007. An analysis of home loan approval rates by race and income revealed several trends that may be a cause of concern for the City of Long Beach. In 2003, when the housing market and home prices were at their peak, low-income minorities (those making less than 50% of AMI) had higher approval rates than low-income Whites for conventional home purchase loans. An active housing market increases opportunities for predatory lending and it is unclear whether these low-income households were actually able to afford the home loans they were approved for. The higher approval rates may indicate that low-income minority households, especially low-income Blacks who had the highest approval rates of all racial/ethnic groups in 2003, were more likely to be victims of predatory lending than low-income White households.

A difference in the approval rates of home loans for White and non-White households can also be seen in 2007, when the housing market began to slump and home prices fell. Among high-income households (those earning 120% of AMI or more), Whites had significantly higher approval rates (65%) for conventional home loans than any other ethnic/racial group. Blacks in the high-income category, meanwhile, had the lowest approval rate (46%). Since it is assumed that most households in this income category are financially capable of purchasing homes, the discrepancy in home loan approval rates indicates the possibility of racial bias in lending practices.

2010 AI Proposed Action(s):

- 14.1: The City will continue working with local lenders, realtors, and the FHF to promote awareness of fair lending practices and strengthen the resource guide on the City website to help households facing foreclosures and other lending issues. The City will continue to require participation in a homebuyer education course as part of the First-Time Homebuyer and Silent Second programs.

Time Frame: Develop resource guide by 2010.

14.1. A: Through its website, the City provides a list of homebuyer programs and resources that include information on local lenders, realtors, HUD-approved homebuyer education courses and a variety of loan programs.

6.3 New Conclusions and Impediments from 2010 AI Update

Based on the research and analysis conducted for the 2010 AI Update, the following is a list of new conclusions and potential impediments that may exist in the City of Long Beach.

Demographics

Impediment #15: Race and Ethnicity

Long Beach is considered to be the most ethnically diverse major city in the United States. During the 1970s and 1980s, the City was the destination for thousands of immigrants fleeing wars and political turmoil in Southeast Asia, especially from Cambodia, Vietnam and the Philippines. These migrants were followed by other in-migrants from various Latin American countries. During the 1980s, the City's foreign-born population doubled to over 100,000 persons, with the majority of the immigrants coming from Mexico and Central America. The arrival of large numbers of Asian and Latin American immigrants in Long Beach quickly transformed the City from what had previously been a predominantly White community into a truly multi-ethnic society where there is no major ethnicity.

Between 1980 and 2000, the White population declined from 68% to 33% of the total population, while the Hispanic population more than doubled in number, increasing from 14% to 36%. Similarly, the number of Asian residents has doubled, increasing from 6% in 1980 to 13% in 2000. The proportion of Black residents exhibited an increase, from 11% to 15% of the population. Reflective of the demographics in the City, 84% of all Long Beach residents speak languages other than English at home, and 50% speak English "less than very well." Linguistic isolation is slightly more prevalent among the Hispanic population. Approximately 30% of Long Beach residents speak Spanish at home and approximately 58% of these persons speak English "less than very well." In comparison, 11% of Long Beach residents speak Asian languages at home and about 51% of these speak English "less than very well."

Long Beach has effectively become a "starter community" for many new immigrants; a place where they begin the critical process of acculturation. In 2000, 29% of the City's residents were foreign-born, equating to roughly 132,000 foreign-born residents. Approximately one-third of this population entered the United States after 1990 – predominately from Mexico (59%), Asia (24%) and Central America (10%) – indicating a relatively new immigrant population. Foreign-born residents may have difficulty accessing housing due to language barriers or an apartment owner's reluctance to rent housing to an immigrant. In addition, a fair housing concern could arise if a foreign-born resident owns an apartment building and advertises only in his or her native language, thus limiting access only to persons speaking that language.

2010 AI Proposed Action(s):

- 15.1: The City and its Human Dignity Program (HDP) will work with FHF to organize an event to be held in the month of April. The event will promote community awareness towards celebrating racial, cultural, and social diversity, and education regarding all aspects of housing.

Time Frame: Plan development by June 2010 and hold event annually thereafter.

15.1. A:

- The City will continue to contract with FHF to provide fair housing services that will include the following services to affirmatively further fair housing: fair housing complaint intake, investigation, resolution, general housing (tenant/landlord) counseling, mediations, assistance, referrals, resolution, education, and outreach activities throughout the City emphasizing target populations likely to experience discrimination, underrepresented communities, housing providers, and the general public. FHF holds the Fair Housing Reception and Poster Contest annually in April, Fair Housing Month. Many agencies in the housing field also conduct special events in April honoring Fair Housing Month. FHF participates in numerous events, including housing fairs, the Fair Housing Summit, City Council proclamation presentations, and apartment association annual events. FHF promotes community awareness towards celebrating racial, cultural, and social diversity, and education regarding equality daily through the extensive education and outreach program provided regionally and within the City.
- In 2016, the Human Relations Commission will work with FHF to help promote an event to promote community awareness towards celebrating racial, cultural and social diversity, and education regarding all aspects of housing. FHF will work with the Human Dignity Program Coordinator to provide an annual report of accomplishments as well as discuss any fair housing issues with the Human Relations Commission.

Impediment #16: Large Households

Approximately 26,700 large households were living in Long Beach, representing 16% of all households in the City. Of these large households, 60% were renters, with the majority of these large renter-households (75%) earning low to moderate incomes. The CHAS Databook reports that 93% of the City's large renter-households were experiencing one or more housing problems, including housing overpayment (cost burden), overcrowding and/or substandard housing conditions.

The CHAS Databook further documents the mismatch between the need for larger rental units and the City's supply of smaller units. Fewer than 8,000 rental units in Long Beach had three or more bedrooms, in general, the appropriate sized unit for a large household of five or more members. In contrast, the City had over 16,000 large renter-households – twice the number that could be accommodated within the stock of large rental units. This imbalance between supply and demand contributes to 86% of the City's large renter-households residing in overcrowded conditions. Large households also often face discrimination in the housing market, particularly in the rental housing market. Landlords may discriminate against large families for fear of excessive wear and tear or liability issues related to children.

2010 AI Proposed Action(s):

16.1: The City will continue working with developers, affordable housing advocate groups, and FHF to identify and pursue all available funding to develop affordable housing to include large family rentals, and units for the disabled.

Time Frame: Ongoing.

16.1A: The City's Adopted and Certified 2013-2021 Housing Element addresses affordable housing production. Specifically, Program 4.1, Affordable Housing Development Assistance, sets forth objectives to do the following: (1) annually monitor the availability

of State and federal funding and partner with affordable housing developers, if necessary, in applying for additional funds; (2) identify qualified nonprofit developers for partnership in affordable housing construction and/or acquisition and rehabilitation projects; (3) prepare and implement a Housing Action Plan, which will address potential uses of available funds and establish a priority for the use of those funds.

Impediment #17: Housing Affordability Disproportionately Impacting Minority Households and Those with Special Needs

As of the 2000 Census, households in Long Beach earned a median household income of \$37,270 – well below the \$42,189 median household income for Los Angeles County. One-third of Long Beach households earned less than \$25,000, and nearly two-thirds earned less than \$50,000. State and federal standards specify that a household experiences a housing cost burden if it pays 30% or more of its gross income on housing. In Long Beach, housing cost burden is more prevalent among renter-households (46%) than owner-households (32%). Renter-households were also more likely to experience severe housing cost burden, spending 50% or more of household income on housing, with 24% of renters experiencing severe housing cost burden compared to 12% of owners.

Most of the housing problems in Long Beach are the result of high housing costs and the lack of sufficient affordable housing in the region, relative to the low incomes of many residents. While housing affordability per se is not a fair housing issue, the lack of affordable housing can create a market condition that offers financial incentives for housing discrimination, and makes discrimination more likely to occur because of the large applicant pool. Also, housing affordability tends to disproportionately affect minority populations. In Long Beach, Whites had the lowest proportion of lower income households (17%), in contrast with Hispanic (39%), Black (38%), and Asian (33%) populations. In this regard, housing affordability is a fair housing concern.

2010 AI Proposed Action(s):

17.1: The City will target a portion of its housing resources to benefit households of extremely low incomes (30% AMI) and to facilitate the development of housing for persons with special needs. Specifically, the 2008-2014 Housing Element commits to the following:

- Target assistance to extremely low-income households to help the Housing Authority meet its HUD-required ratio of assistance for extremely low income households.
- Develop at least 100 new efficiency units on remaining land at the Villages at Cabrillo by 2012. These units benefit primarily extremely low and very low income households.
- Provide security deposit assistance to 300 homeless households (50 households annually). This program benefits primarily extremely low income households.
- Provide assistance to rehabilitate 44 rental and 10 owner units. Target a portion of the assistance to benefit 10 extremely low income renter households.
- Eliminate lead-based paint hazards for 320 homes.
- Continue to provide funding to help gap-finance affordable housing. Priority in funding is granted to projects housing special needs groups and/or enriched with

supportive services such as childcare, health programs, job training, and financial and legal counseling. These groups represent the extremely low and low-income households in the community.

- Continue to provide assistance to 260 households through the Housing Opportunity for Persons with AIDS (HOPWA) Tenant-Based Rental Assistance.

Time Frame: Ongoing

17.1. A: The 2008-2014 Housing Element commitments listed above were completed. The 2013-2021 Housing Element continues efforts to target a portion of housing resources to benefit households of extremely low income (30% Area Median Income) and to facilitate the development of housing for persons with special needs. Specifically, the 2013-2021 Housing Element commits to the following:

- New Construction (RHNA): The City will maintain an adequate sites inventory for the remaining RHNA of 7,048 units (886 extremely low income household units).
- Housing Preservation (At-Risk Housing): Annually, the City will monitor status of the 800 extremely low income housing units in 21 projects that are at risk of converting to market rate. Seek to preserve these affordable units for extremely low income households and very low income households.
- Home Rehabilitation: The City will provide rehabilitation assistance to 3,032 households (950 extremely low income units).
- Lead-Based Paint Hazard Abatement: The City will enroll 60 extremely low income housing units into the Lead Hazard Control (LHC) program and obtain owner consent to inspect units for lead hazards.
- Housing Choice Vouchers (HCV): Currently close to 3,500 extremely low income households hold Housing Choice Vouchers and almost approximately 3,000 more households are on the waiting list to receive assistance. The City will continue to assist HCV recipients.
- Family Self-Sufficiency: Approximately 427 extremely low income Housing Choice Voucher holders in Long Beach participate in this program. The City will continue to implement the Family Self-Sufficiency Program.
- Housing Opportunities for Persons with AIDS (HOPWA): The City will continue to provide assistance to 114 extremely low income households through the HOPWA Long- Term Tenant-Based Rental Assistance and Short-Term Assistance Program.
- HOME Security Deposit: The City will continue to provide security deposit assistance to 350 extremely low income homeless households.
- Veterans Affairs Supportive Housing (VASH): The City will lease 243 allocated vouchers to extremely low income households and pursue additional funding in

the future.

- Project-Based Vouchers: The City will continue to utilize project-based vouchers to provide affordable housing for 22 extremely low income households.

Housing Market Conditions

Impediment #18: Tenure

Contrary to public perception, home ownership rates in the City have remained stable over the past two decades. From 1980 to 2000, about 41% of Long Beach households owned their homes, while 59% rented their homes. Despite maintaining a consistent level of homeownership, however, the homeownership rate in Long Beach is still relatively low in comparison to both the County (48%) and the State (57%), and is particularly low among Black and Hispanic residents. The 2000 Census documents the following homeownership rates by race/ethnicity in Long Beach: 25% for Blacks, 32% for Hispanics, 41% for Asians, and 60% for Whites. The dramatic escalation in housing prices since 2000 further exacerbates the problem of limited home purchase opportunities for these households.

In 1990, rental vacancies in Long Beach were at 7.5%, indicating an adequate supply of rentals to allow mobility. However, with only limited increases in rental housing and continued population pressures, rental vacancies had dropped to 4.2% by 2000. The declining vacancy rate in the City indicates that finding housing in the rental market is likely a challenge for many households, particularly for large families. In general, housing discrimination issues are more prevalent in the rental housing market since renters are more likely to be subject to conditions in the housing market that are beyond their control.

2010 AI Proposed Action(s):

18.1: The City will target a portion of its housing resources to benefit households of extremely low incomes (30% AMI) and to facilitate the development of housing for persons with special needs. Specifically, the 2008-2014 Housing Element commits to the following:

- Target assistance to extremely low-income households to help the Housing Authority meet its HUD-required ratio of assistance for extremely low income households.
- Develop at least 100 new efficiency units on remaining land at the Villages at Cabrillo by 2012. These units benefit primarily extremely low and very low income households.
- Provide security deposit assistance to 300 homeless households (50 households annually). This program benefits primarily extremely low income households.
- Provide assistance to rehabilitate 44 rental and 10 owner units. Target a portion of the assistance to benefit 10 extremely low income renter households.
- Continue to provide funding to help gap-finance affordable housing. Priority in funding is granted to projects housing special needs groups and/or enriched with supportive services such as childcare, health programs, job training, and financial and legal counseling. These groups represent the extremely low and low-income

households in the community.

- Continue to provide assistance to 260 households through the Housing Opportunity for Persons with AIDS (HOPWA) Tenant-Based Rental Assistance.

Time Frame: 2008-2014.

18.1. A: The 2008-2014 Housing Element commitments listed above were completed. The 2013-2021 Housing Element continues efforts to target a portion of housing resources to benefit households of extremely low income (30% Area Median Income) and to facilitate the development of housing for persons with special needs. Specifically, the 2013-2021 Housing Element commits to the following:

- New Construction (RHNA): The City will maintain an adequate sites inventory for the remaining RHNA of 7,048 units (886 extremely low income household units).
- Housing Preservation (At-Risk Housing): Annually, the City will monitor status of the 800 extremely low income housing units in 21 projects that are at risk of converting to market rate. Seek to preserve these affordable units for extremely low income households and very low income households.
- Home Rehabilitation: The City will provide rehabilitation assistance to 3,032 households (950 extremely low income units).
- Lead-Based Paint Hazard Abatement: The City will enroll 60 extremely low income housing units into the Lead Hazard Control (LHC) program and obtain owner consent to inspect units for lead hazards.
- Housing Choice Vouchers (HCV): Currently close to 3,500 extremely low income households hold Housing Choice Vouchers and almost approximately 3,000 more households are on the waiting list to receive assistance. The City will continue to assist HCV recipients.
- Family Self-Sufficiency: Approximately 427 extremely low income Housing Choice Voucher holders in Long Beach participate in this program. The City will continue to implement the Family Self-Sufficiency Program.
- Housing Opportunities for Persons with AIDS (HOPWA): The City will continue to provide assistance to 114 extremely low income households through the HOPWA Long- Term Tenant-Based Rental Assistance and Short-Term Assistance Program.
- HOME Security Deposit: The City will continue to provide security deposit assistance to 350 extremely low income homeless households.
- Veterans Affairs Supportive Housing (VASH): The City will lease 243 allocated vouchers to extremely low income households and pursue additional funding in the future.

- Project-Based Vouchers: The City will continue to utilize project-based vouchers to provide affordable housing for 22 extremely low income households.

Impediment #19: Housing Stock

The advanced age of the majority of Long Beach’s housing stock indicates a significant need for continued code enforcement, property maintenance and housing rehabilitation programs to stem housing deterioration. Among owner-occupied housing, over 80% of units were constructed prior to 1970, largely a reflection of the community’s numerous Post World War II subdivisions. While a lesser proportion of renter housing is greater than 30 years in age (68%), this housing is typically of lesser quality construction and suffers more wear-and-tear from tenants than owner-occupied housing. The prevalence of housing built prior to 1978 is also of concern because of lead-based paint hazards. Habitability and repair issues were consistently one of the most commonly reported housing issues to the Fair Housing Foundation from 2003 to 2008 (14% of all cases).

2010 AI Proposed Action(s):

19.1: The City will target a portion of its housing resources to benefit households of extremely low incomes (30% AMI) and to facilitate the development of housing for persons with special needs. Specifically, the 2008-2014 Housing Element commits to the following:

- Provide assistance to rehabilitate 44 rental and 10 owner units. Target a portion of the assistance to benefit 10 extremely low income renter households.
- Eliminate lead-based paint hazards for 320 homes.

Time Frame: 2008-2014.

19.1. A:

- The City will continue to contract with FHF to provide fair housing services that will include the following services to affirmatively further fair housing: fair housing complaint intake, investigation, resolution, general housing (tenant/landlord) counseling, mediations, assistance, referrals, resolution, education, and outreach activities throughout the City emphasizing target populations likely to experience discrimination, underrepresented communities, housing providers, and the general public. FHF continues to provide referrals to the appropriate agencies for concerns and problems with lead-based paint hazards. In 2014-2015 FHF distributed over 140,000 pieces of Lead-Based Paint literature regionally at Education and Outreach Activities, with 2,997 of those within the City.
- In FY 2012, the Department of Health and Human Services Bureau of Environmental Health was awarded a three-year \$2.5 million grant from HUD to continue its Lead Hazard Control (LHC) Program. The LHC Program identifies low-income residences (with a focus on families with children under six years old) and addresses lead poisoning hazards created by lead-based paint. The program hires painting and construction companies that are certified to work with lead; families are relocated during the renovations. The program is also responsible for conducting outreach/education events in the community and training economically disadvantaged people in lead-safe work practices so that they may be hired as part of these renovations. Furthermore, all CDBG-, HOME-, and ESG-funded housing programs and projects have incorporated lead-based

paint hazard reduction efforts. In addition, Code Enforcement uses Lead Safe Work Practice (LSWP) standards to correct code enforcement violations. The Lead Hazard Control Program received a no-cost extension to continue operations to the end of calendar year 2015.

Impediment #20: Assisted Housing

Long Beach has a sizable stock of publicly assisted rental housing. This housing stock includes all multi-family rental units assisted under federal, state, and local programs, including HUD, state/local bond programs, density bonus and Long Beach redevelopment programs. Assisted rental projects include both new construction, as well as rehabilitation projects with affordability covenants. A total of 4,043 publicly assisted multi-family units are located in the City. While housing affordability is not a fair housing concern per se, providing opportunities for a variety of housing choice can help lessen the likelihood of housing discrimination by increasing the supply.

2010 AI Proposed Action(s):

20.1: The City will target a portion of its housing resources to benefit households of extremely low incomes (30% AMI) and to facilitate the development of housing for persons with special needs. Specifically, the 2008-2014 Housing Element commits to the following:

- Target assistance to extremely low-income households to help the Housing Authority meet its HUD-required ratio of assistance for extremely low income households.
- Develop at least 100 new efficiency units on remaining land at the Villages at Cabrillo by 2012. These units benefit primarily extremely low and very low income households.
- Provide security deposit assistance to 300 homeless households (50 households annually). This program benefits primarily extremely low income households.
- Provide assistance to rehabilitate 44 rental and 10 owner units. Target a portion of the assistance to benefit 10 extremely low income renter households.
- Eliminate lead-based paint hazards for 320 homes.
- Continue to provide funding to help gap-finance affordable housing. Priority in funding is granted to projects housing special needs groups and/or enriched with supportive services such as childcare, health programs, job training, and financial and legal counseling. These groups represent the extremely low and low-income households in the community.
- Continue to provide assistance to 260 households through the Housing Opportunity for Persons with AIDS (HOPWA) Tenant-Based Rental Assistance.

Time Frame: 2008-2014.

20.1.A: The 2008-2014 Housing Element commitments listed above were completed. The 2013-2021 Housing Element continues efforts to target a portion of housing resources to benefit households of extremely low income (30% Area Median Income) and to facilitate the development of housing for persons with special needs. Specifically, the

2013-2021 Housing Element commits to the following:

- New Construction (RHNA): The City will maintain an adequate sites inventory for the remaining RHNA of 7,048 units (886 extremely low income household units).
- Housing Preservation (At-Risk Housing): Annually, the City will monitor status of the 800 extremely low income housing units in 21 projects that are at risk of converting to market rate. Seek to preserve these affordable units for extremely low income households and very low income households.
- Home Rehabilitation: The City will provide rehabilitation assistance to 3,032 households (950 extremely low income units).
- Lead-Based Paint Hazard Abatement: The City will enroll 60 extremely low income housing units into the Lead Hazard Control (LHC) program and obtain owner consent to inspect units for lead hazards.
- Housing Choice Vouchers (HCV): Currently close to 3,500 extremely low income households hold Housing Choice Vouchers and almost approximately 3,000 more households are on the waiting list to receive assistance. The City will continue to assist HCV recipients.
- Family Self-Sufficiency: Approximately 427 extremely low income Housing Choice Voucher holders in Long Beach participate in this program. The City will continue to implement the Family Self-Sufficiency Program.
- Housing Opportunities for Persons with AIDS (HOPWA): The City will continue to provide assistance to 114 extremely low income households through the HOPWA Long- Term Tenant-Based Rental Assistance and Short-Term Assistance Program.
- HOME Security Deposit: The City will continue to provide security deposit assistance to 350 extremely low income homeless households.
- Veterans Affairs Supportive Housing (VASH): The City will lease 243 allocated vouchers to extremely low income households and pursue additional funding in the future.
- Project-Based Vouchers: The City will continue to utilize project-based vouchers to provide affordable housing for 22 extremely low income households.

Land Use and Public Policies

Impediment #21: Housing and Land Use Policies

Housing and land use policies impact the range of housing options available for residents, particularly those with special needs. As part of the City's 2008-2014 Housing Element update, the City conducted a detailed review of its housing and land use policies (including General Plan and Zoning provisions) to identify constraints for housing for persons with special needs and those with

lower and moderate incomes. Specifically, the Housing Element identifies the following potential constraints:

- The City’s definition of family in the Zoning Code may potentially constrain housing for persons with disabilities.
- The Zoning Code does not contain provisions for Single-Room Occupancy (SRO) units.

2010 AI Proposed Action(s):

21.1: Amend the Zoning Code to incorporate SRO housing under the provisions for Special Group Residence. Conditions for approval will be objective and pertain to performance standards such as parking, management, and security. Such conditions will be similar to those required for other Special Group Residence uses in the same zone.

Time Frame: Amend the Zoning Code by August 2010.

21.1. A:As an initial step to incorporate Single Residential Occupancy (SRO) under the provisions for Special Group Residences, on June 16, 2015, the Long Beach City Council adopted an ordinance adding a definition of SRO to the Zoning Code. The specific changes to allow SRO under provisions for Special Group Residences will occur with a Zoning Code update after the adoption of the a new Land Use Element of the General Plan.

21.2: Review the Zoning Code definition of family and amend as necessary and appropriate to ensure clarity and remove any potential constraints to housing for persons with disabilities.

Time Frame: Review and amend as necessary the Zoning Code by August 2010.

21.2.A:On June 16, 2015, the Long Beach City Council adopted an ordinance defining “family” to mean two or more persons that occupy a dwelling unit and live together as a single housekeeping unit. A family has established ties and familiarity with each other; jointly uses common areas, interacts with each other, shares meals, household activities and chores, expenses and responsibilities. Membership in a family is fairly stable as opposed to transient. Family members have some control over who becomes a member of the family, and the residential activities of the family are conducted on a non-profit basis. Typically each member of a family has access to all parts of the dwelling unit and the members of the family have close social, economic, and psychological commitments to one another.

Access to Financing

Impediment #22: Sub-prime Lending Activity

Conventional home purchase loans were a major loan source for Long Beach households. Only a handful of households in the City applied for a government-backed loan; most of these applications (70%), however, were approved.

The HMDA data available do not provide information on which loans were actually prime or sub-prime mortgage loan applications among conventional home purchase loans. It is likely that a number of households that in the past would have opted for government-backed loans were able to

receive conventional loans through the sub-prime market. Sub-prime lenders generally have interest rates that are higher than those in the prime market. While sub-prime lending cannot in and of itself be equated with predatory lending, studies have shown a high incidence of predatory lending in the sub-prime market. Unlike the prime lending market, overly high approval rates in the sub-prime market is a potential cause for concern when the target clients are considered high-risk.

The three top lenders in Long Beach for 2007 were Countrywide, Bank of America, and Wells Fargo. All three banking institutions had extremely high approval rates (over 80%). Countrywide also had the highest proportion of loans that were withdrawn by the applicant or closed for incompleteness.

2010 AI Proposed Action(s):

22.1: The City will continue working with local lenders, realtors, and the FHF to promote awareness of fair lending practices and strengthen the resource guide on the City website to help households facing foreclosures and other lending issues. The City will continue to require participation in a homebuyer education course as part of the First-Time Homebuyer and Silent Second programs.

Time Frame: Develop resource guide by 2010

22.1A: The City provides a list of resources through the Neighborhood Stabilization Program that includes local lenders, realtors, and HUD approved homebuyer education courses. http://www.lbds.info/neighborhood_services/nsp2.asp

Fair Housing Complaints

Impediment #23: Type of Discrimination

Consistent with recent statewide trends, the top three discrimination biases are race (37%), followed closely by disability (24%), and familial status (14%). FHF conducted a total of 677 investigations on 415 fair housing cases between 2003 and 2008. Of the cases investigated, FHF found evidence of discrimination in 168 cases (40%). Over 40% of the cases with evidence of discrimination closed as successfully conciliated resulting from both the complainant and respondent agreeing to a resolution. Of the remaining cases, 2% were referred to an attorney for litigation and 7% were referred to the State Department of Fair Employment and Housing (DFEH) or the U.S. Department of Housing and Urban Development. The remaining cases were closed as no enforcement action possible due to a lack in the strength of evidence to further pursue the claims or lack of follow-through by the complainants.

2010 AI Proposed Action(s):

23.1: Universal Design is the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. The City will evaluate the feasibility of providing additional density bonuses or other incentives for new developments that include universal design.

Time Frame: Explore incentives in 2010.

23.1A: After the adoption of the City's new Land Use and Urban Design Elements, the City will include universal design principles and guidelines in the Zoning Code, as a standalone document, or both.

As stated in the City's 2013-2021 Housing Element, the City will evaluate the feasibility

of providing additional density bonuses or other incentives for new development that includes universal design (beyond required ADA standards) by 2017 as part of the tri-annual update of the Building Code.

23.2 : The City will continue working with developers, affordable housing advocate groups, and FHF to identify and pursue all available funding to develop affordable housing to include large family rentals, and units for the disabled.

Time Frame: Ongoing.

23.2.A: The City's adopted and certified 2013-2021 Housing Element addresses affordable housing production. Specifically, Program 4.1, Affordable Housing Development Assistance, sets forth objectives to do the following: (1) annually monitor the availability of State and federal funding and partner with affordable housing developers, if necessary, in applying for additional funds; (2) identify qualified nonprofit developers for partnership in affordable housing construction and/or acquisition and rehabilitation projects; (3) prepare and implement a Housing Action Plan, which will address potential uses of available funds, and establish a priority for the use of those funds.

23.3: The City will work with the Long Beach Housing Authority to make available on FHF and city websites a list of affordable housing units by size and those accessible to disabled persons.

Time Frame: Ongoing.

23.3. A: The following websites identify available rental housing:

- FHF's website <http://www.fairhousingfoundation.com> provides a link to Los Angeles County rental listings.
- Households requesting information on Affordable Housing in the City are referred the Cities website as <http://www.lbds.info/civica/filebank/blobdload.asp?BlobID=4075>.

Impediment #24: Administrative Policies

Due to budgetary constraints, the City has not conducted sensitivity training for staff for a number of years. Many City staff members interact with residents directly, and therefore it is pertinent that staff members are aware of fair housing rights and are sensitive to the cultural differences of the City's diverse population.

The City has a range of commissions and committees that help guide the development and implementation of housing policies, services, and programs of the City. The City should seek to maximize the diverse representation on these commissions and committees.

2010 AI Proposed Action(s):

24.1: The City will identify specific funding sources available and resume sensitivity training for staff every other year.

Time frame: Identify funding by 2010 and provide training every other year.

24.1A:

- In 2016, FHF will provide an overview on Impediments to Fair Housing and overall fair housing regulations to Development Services and Housing Authority staff that are involved in all housing activities and programs, including Code Enforcement staff.
- The City of Long Beach provides a training for staff who speak the LAP languages on the appropriate techniques and ethics with respect to interpretation and translation.