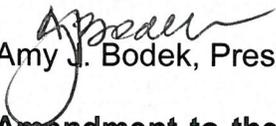


M E M O R A N D U M

DATE: October 21, 2015

TO: Board of Directors
The Long Beach Community Investment Company

FROM: 
Amy J. Bodek, President

SUBJECT: Amendment to the City of Long Beach Analysis of Impediments to Fair Housing Choice

RECOMMENDATION:

Receive and file an update to Chapter 6, "Conclusions, Impediments, and Actions," of the current *City of Long Beach Analysis of Impediments to Fair Housing Choice* (AI), as required by the Housing and Community Development Act of 1974.

BACKGROUND

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.

These responsibilities are summarized in the AI (Exhibit A).

DISCUSSION

Grantees are required, when necessary, to update an AI or develop a new AI with full demographic, housing and other related data analysis as well as conduct public outreach. The current AI, which was completed and implemented starting in grant year 2011, would have normally been replaced by a fourth generation AI by October 1, 2015.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 its current AI and postpone its slated new planning and analysis effort in order to follow HUD's development guidelines under the new rules. These rules were made available on July 16, 2015. Because insufficient time was available prior to October 1 to collect and analyze data based on the new rules, staff has prepared an update to Chapter 6 (Exhibit B). Chapter 6 is the core of the AI that evaluates the status of the identified potential impediments to fair housing vis-a-vis the stated actions. Until a full 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.

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) that 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 Consolidated Plan due date of October 1, 2017, or January 4, 2017. To start the development process, staff has released a Request for Proposals (RFP) for consultant services to prepare an AFH pursuant to HUD guidelines. The contract start date is expected to be at the end of December 2016. In addition, staff will report back to the Board on the proposed work plan including a timeline to achieve the various anticipated milestones such as public hearings, community meetings and noticing/publishing dates.

SUGGESTED ACTION:

Approve recommendation.

Attachments: Exhibit A – 2010 AI
Exhibit B – 2015 AI Update, Chapter 6

AJB:LAF:AH

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