



Appendix 1.1

Housing Element Assessment of Fair Housing

Appendix 1.1:

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Introduction

The need to build a more just and equitable Los Angeles has never been more urgent nor more opportune. Mass mobilizations around racial justice have heightened the awareness of structural racism in urban planning and policy making. Skyrocketing homelessness and a growing affordability crisis has forced cities to reimagine how to accommodate more housing and identify strategies for ending exclusionary zoning. And in the midst of the COVID-19 pandemic, all levels of government have enacted renter protection and support programs that seemed impossible just a year prior.

The City of Los Angeles is known for its tremendously diverse population and is home to people with a variety of racial and ethnic backgrounds and cultures from around the world. However, the diversity is not reflected in residential patterns as only 3% of the city's census tracts are considered a well-integrated mixture of Black, Latinx, Asian, and white residents. The imperative to change housing policy is in direct response to decades of discrimination and racial segregation, inequitable zoning practices, lack of tenant protections, and unjust patterns of investment and disinvestment. Although Los Angeles is a diverse city and home to people from over 140 countries who speak 224 languages, racial and ethnic segregation remains highly entrenched throughout the city, leading to inequitable access to job centers, high performing schools, and environmentally healthy neighborhoods. Seventy years ago the patterns of racial, ethnic, and economic segregation were established by law through financial practices like redlining and restrictive covenants and today these patterns are perpetuated through zoning, inequitable investment, and housing discrimination. By planning for land use reforms and tenant protection policies and programs, the Housing Element

can address these historic and ongoing patterns of inequity and create a blueprint for a more inclusive, equitable, and prosperous city.

In compliance with AB 686, the 2021–2029 Housing Element cycle includes an Affirmatively Furthering Fair Housing (AFFH) analysis that builds off the City of Los Angeles’ previous 2018–2023 Assessment of Fair Housing (AFH) and provides a framework for the future 2023–2028 AFH. Affirmatively furthering fair housing means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities.”¹ In the California Department of Housing and Community Development guidance memo for public agencies and local governments, Director Gustavo Velasquez states:

“Affirmatively furthering fair housing in California is about achieving better outcomes for all Californians regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, disability, and all other protected characteristics. These principles and requirements are necessary in addressing the racial wealth and homeownership gap, income disparities, and unequal access to opportunities. When everyone has better housing, health, and economic outcomes, we all do better as a whole.”²

As part of the mandate to Affirmatively Further Fair Housing, jurisdictions must include an analysis of disproportionate housing needs for people with protected characteristics, identify patterns of integration and segregation including racially or ethnically concentrated areas of poverty, and describe disparities in access to opportunity.

Integrating an Affirmatively Furthering Fair Housing analysis into the goals, policies and programs of the Housing Element ensures that the city can address the need to accelerate housing production while also expanding access to opportunity for all residents, preventing displacement, and reducing patterns of racial and economic segregation. Identifying and remedying the historic inequities facing low income people and people of color have been consistently a priority and commitment for the City of Los Angeles. With this understanding comes a renewed commitment to tackle the sources of persistent racial disparities.

The City of Los Angeles completed the 2018–2023 Assessment of Fair Housing (AFH).³ The AFH analyzed a variety of fair housing issues including patterns of integration and segregation of members of protected classes; racially or ethnically concentrated areas of poverty (R/ECAPs) within Los Angeles and regionally; disparities in access to opportunity in education, employment, transportation, environmental health, and

1. Gov. Code, § 8899.50, subd. (a)(1).

2. California Department of Housing and Community Development, Affirmative Furthering Fair Housing Guidance Memo, https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

3. The full Assessment of Fair Housing can be found here: https://hcidla2.lacity.org/wp-content/uploads/2020/05/city_of_la_afh_plan.pdf?download=1

exposure to poverty, and disproportionate housing needs. This appendix builds on the data analysis of the AFH, accounts for new information and findings from the last three years, and takes stock of the prioritization of contributing factors identified during the AFH process, which include the availability of affordable units in a range of sizes, displacement of residents due to economic pressures, lack of access to opportunity due to high housing costs, land use and zoning laws when used as a tool to segregate communities, loss of affordable housing, and discrimination. The Goals and Actions can be found in Chapter Six as Program 124 (Affirmatively Furthering Fair Housing).

Highlights of Data Analysis

Utilizing the index of dissimilarity—a common demographic measure of segregation between two groups—Black/white and Latinx/white each surpass the threshold score 60 to be defined as highly segregated. Although segregation patterns between Black and White residents have declined since the 1990s, they still remain the largest segregated group in the city. Compounding these circumstances is an astonishing exodus of Black residents out of the city causing the Black population to decrease by 35% within the past three decades. And while Latinx residents have accounted for the largest growth in population during the same period, the Latinx/white dissimilarity score has essentially remained the same.

Racial segregation has numerous implications with inequitable access to resources and opportunity. HUD defines Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) as a census tract with a majority non-white population and 40% or more of individuals live at or below the poverty line. Overall, one in ten of the city's residents live in a R/ECAP census tract. When disaggregated, disparities are evidently found with Black Angelinos residing in nearly 13% of R/ECAP tracts, but only represent 8% of the city's population. And more severely, Latinx Angelinos reside in over 70% of the R/ECAP tracts, yet represent only nearly 49% of the population.

By contrast, when HCD's measure of opportunity index is employed, over 65% of the city's white residents live in neighborhoods classified as High Resource and Highest Resource areas while only making up 28% of the total population. Access to these same areas for residents of color are substantially much lower with Asian at 41%, Black 18%, and Latinx at only 13%.

The harmful effects on the quality of life for Angelinos of color due to segregation and exclusion are further demonstrated with substantially lower access to higher performing schools, employment opportunities, and a healthy environment. When applying the indices created by HCD and TCAC, neighborhoods defined as "Mostly white" attained the highest scores across all these categories. When accounting for the Educational Domain score, predominantly white neighborhoods scored nearly four times higher than predominantly Latinx and Asian-Latinx, and eight times higher than Black-Latinx neighborhoods. For the Economic Domain score, white neighborhoods predominantly scored over three times higher than Black-Latinx and predominantly Latinx neighborhoods. And when accounting for the Environmental Domain score,

predominantly white neighborhoods scored 20% higher than the Black and Latinx neighborhoods.

The results demonstrate the tremendous need to affirmatively further fair housing by ensuring greater access for Angelinos of color to the High and Highest Resources areas where white residents continue to remain the primary beneficiaries of private and public investment. Simultaneously, anti-displacement policies are essential to balancing the needs of Black Indigenous, and People of Color (BIPOC) Angelinos residing in segregated and poverty-stricken neighborhoods that have lacked the same amount of private and public investment for decades. Today these neighborhoods are experiencing immense demand with new public and private investments resulting in rapidly growing market rents due to the lack of supply of housing, increasing the risk of displacement for long-term residents of color. Residents who have dedicated their lives to these neighborhoods should have the right to remain if they choose to do so.

For persons with disabilities, the segregation and lack of access to opportunity are not primarily spatial. An estimated 10%, or nearly 400,000 residents, have a disability and live in a non-institutional setting, living fairly dispersed throughout the city. The three largest disability types include ambulatory at over 25%, independent living (i.e., assistance with daily living activities like medical visits, shopping, etc.) at nearly 20%, and cognitive at 19%. The Census defines people with independent living difficulties as those who need assistance with errands, such as visiting a doctor's office or shopping, due to a physical, mental, or emotional issue. Poverty rates among people with disabilities are much higher with over half (54%) of disabled Angelinos classified as Extremely Low Income or Very Low Income, compared to approximately 37.8% of the total population. Approximately 74% of people with disabilities who are not institutionalized and are of working age (18 to 64), in fact are not in the workforce. Their reliance on a typical fixed monthly income does not adequately cover housing costs and living expenses. For those who are active in the workforce, their median earnings are unfortunately 27% lower than non-disabled individuals. These serious financial difficulties limit their ability to find affordable and American with Disabilities Act (ADA)-compliant housing to meet their needs with specific physical modifications. Consequently, while the disabled community is fairly dispersed throughout the city, nearly half (49%) of the population resides in neighborhoods designated as Low Resource or High Segregation and High Poverty areas.

The shortage in resources and compatible housing for the disabled community have serious worst-case outcomes such as experiencing homelessness. The 2020 Homeless Count conducted by LAHSA found that approximately 19% of all unhoused adults had a physical disability, 25% a serious mental illness, and 11% had a developmental disability. The expansion of permanent supportive housing (PSH) is certainly needed to serve the most vulnerable Angelinos with disabilities, but a more balanced approach in site selection will be essential to ensure access to higher opportunity areas. An analysis on the geographic locations of existing PSH sites unveiled that the majority (76%) are located in Low Resource or High Segregation and High Poverty areas while only 12% are located in High or Highest Resource areas.

Building on the 2018–2023 AFH

During the previous AFH process, the City of Los Angeles, Housing Authority of the City of Los Angeles (HACLA), Enterprise Community Partners, the Lawyers' Committee for Civil Rights Under Law, and numerous community stakeholders proposed several broad goals and specific strategies to address the types of fair housing issues and contributing factors affecting people of color, large families with children, and persons with disabilities. Six overarching goals with over 50 strategies were part of the adopted AFH Plan. The Goals outlined are the following:

1. Increase the stock of affordable housing through the city, particularly in neighborhoods of opportunity.
2. Preserve the existing stock of affordable housing and rent stabilized housing
3. Prevent displacement of low and moderate income residents
4. Ensure equal access to housing for persons with protected characteristics, lower-income, and homeless residents
5. Expand access to opportunity for protected classes
6. Increase community integration for persons with disabilities

These goals, strategies and programs have served as a “north star” for the investments and policies the City of Los Angeles has explored and adopted in recent years and is informing the 2021–2029 Housing Element update and AFFH analysis.

Fair Housing Analysis by Race and Ethnicity

The Fair Housing Act (FHA) protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities.⁴ This prohibits discrimination in housing on the basis of seven protected classes: Race, Color, National Origin, Religion, Sexual Orientation, Familial Status and Disability.⁵

4. U.S. Department of Housing and Urban Development (HUD). “Housing Discrimination under the Fair Housing Act.” Housing Discrimination Under the Fair Housing Act. Accessed August 17, 2021. https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_act_overview.

5. For more information on FHA protections, visit: https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_act_overview#_The_Fair_Housing

Outreach conducted for the more recent update of the City of Los Angeles' AFH in 2018 found that out of 2,505 survey respondents, 732 (29.2%) reported having experienced discrimination in their housing either by gender, race and ethnicity, ancestry, disability, familial status, religion, sexual orientation, or other factors. While discriminatory housing practices are illegal, occurrences of landlord harassment based on racial biases, or lack of wheelchair accessibility requirements, are still very common.

Housing Needs by Race and Ethnicity

Due to historic segregation practices, inequitable zoning, and ongoing discrimination, BIPOC Angelinos are far more likely to experience housing insecurity. This section uses data from the Census Bureau to assess housing needs by racial groups. Most of the data indicators in this section focus on individual or household level needs. Addressing the needs of low-income BIPOC communities also requires assessing housing needs at a community level in order to prevent and mitigate displacement which is discussed in more detail later in this analysis.

Housing Needs for Latinx Households

The Latinx population faces some of the most acute housing problems in the city. Latinx households have the lowest median income, lowest rate of homeownership, and highest rates of rent burden and mortgage burden (Charts 1.1.8, 1.1.11 and 1.1.3). The median income for Latinx households is nearly half that of Asian and white households. Yet most shockingly the per capita income, which is calculated by dividing the total household income by the number of people in the household, is three times lower for Latinx households than white households (\$20,273 compared with \$66,939). The substantial disparities in per capita income (when compared to median income) impact Latinx households' earnings and housing choice, as Latinx residents have larger family sizes. As shown in the chart below, the average household size for Latinx is significantly higher than any other racial group; 4.23 for owner occupied housing and 3.45 for renter occupied housing. The combination of larger families and lower incomes results in staggering rates of overcrowding. More than one in four Latinx households is overcrowded, and the rate of overcrowding (Chart 1.1.1) for Latinx households is seven and a half times greater than that of white households, and five times the rate of Black households. An analysis of housing code violations conducted in the 2018–2023 AFH also found that substandard housing conditions are more prevalent in majority Latinx and Black neighborhoods.⁶ Combined, these indicators show that in order to meet the greatest needs of the Latinx residents, the city should produce and preserve larger sized, affordable rental housing options and provide greater support for homeownership to support wealth building and protect against predatory lending.

6. See pages 262-265 of the 2018–2023 AFH for more information.

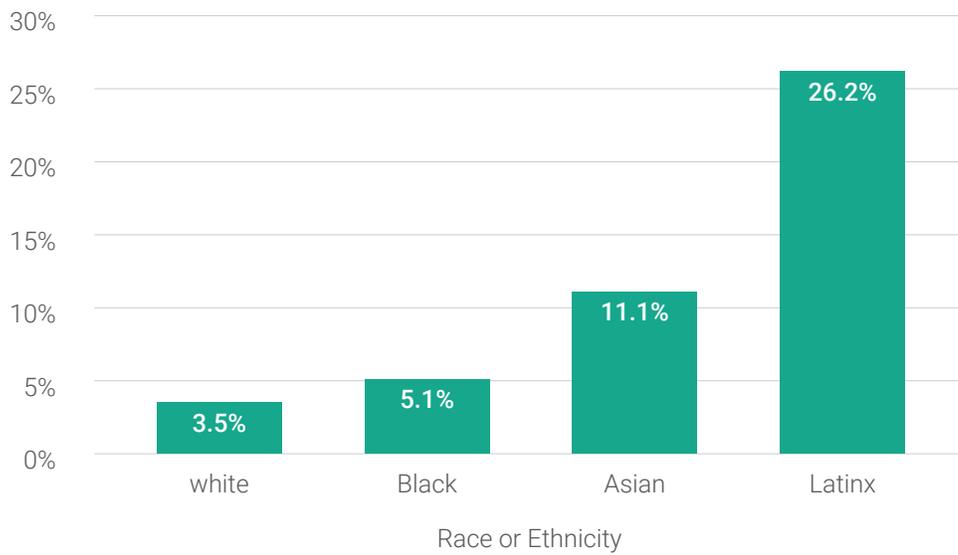
Housing Needs for Black Households

Like Latinx households, Black households have low median incomes, low rates of homeownership, and very high rates of cost burden (Charts 1.1.2 and 1.1.3). Black households also have the highest rates of individuals and families in poverty. However, unlike Latinx households, Black households have a smaller average household size and have lower rates of overcrowding. Black households are far more likely to be impacted by homelessness, more likely to rely on public transit, and more likely to have a disability than any other racial group. According to the 2020 LAHSA Point in Time Count, Black residents make up 8.6% of the city's overall population, but account for 38% of the city's unhoused residents. More than one in six (16%) of Black residents in the city have a disability, which is 8% higher than the rate of Latinx residents, 6% higher than Asian residents, and 5% higher than white residents. Based on data from the Regional Centers for the Developmentally Disabled (Regional Centers), Black residents living in LA County may also be more likely to have a developmental disability. Over 13% of those served by the Regional Centers identify as Black, higher than the overall population of Black residents in the county (9%). Due to higher rates of poverty and disability, one in five (20%) of Black residents do not have access to a vehicle (compared to 13% of Latinx and Asian households and 9% of white households). This data suggests that meeting the most pressing needs of Black residents requires focusing broadly on affordable housing production and preservation strategies, but specifically on permanent supportive housing, affordable housing near transit, and affordable, accessible housing for people with disabilities. Supporting homeownership is also critical in addressing the racial and generational wealth gaps.

Housing Needs for Asian Households

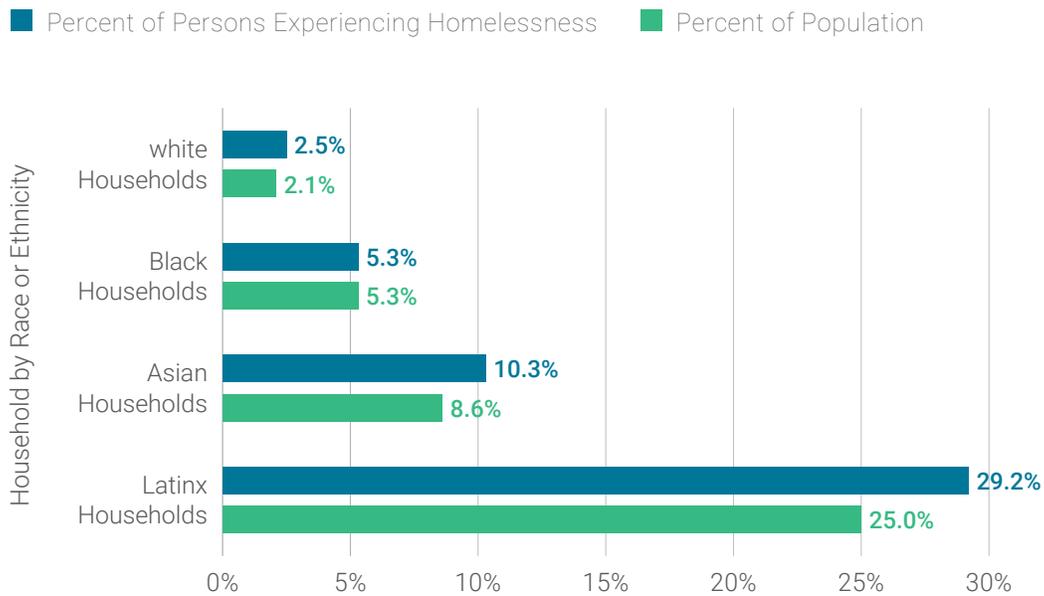
While Asian households have higher incomes and less severe housing insecurity, there are significant disparities when comparing by ethnicity. For example, Filipino and Korean households have significantly lower per capita income and much higher rates of overcrowding than Chinese households. Nearly 15% of Filipino households and 11% of Korean households are overcrowded, compared to just 6% of all Asian households. Korean and Chinese populations both have a higher percentage of people over the age of 65, higher rates of people without vehicles, and higher rates of people in poverty than Filipinos. Nearly one in five (20%) of Korean and Chinese people live in poverty and 19% of Korean and 14% of Chinese households do not have access to a vehicle. Addressing the needs of Asian residents requires acknowledging the differences within racial and ethnic groups such as developing affordable senior housing near transit to meet the needs of some communities while prioritizing the development of larger, family-sized housing for others.

Chart 1.1.1 Rates of Overcrowding



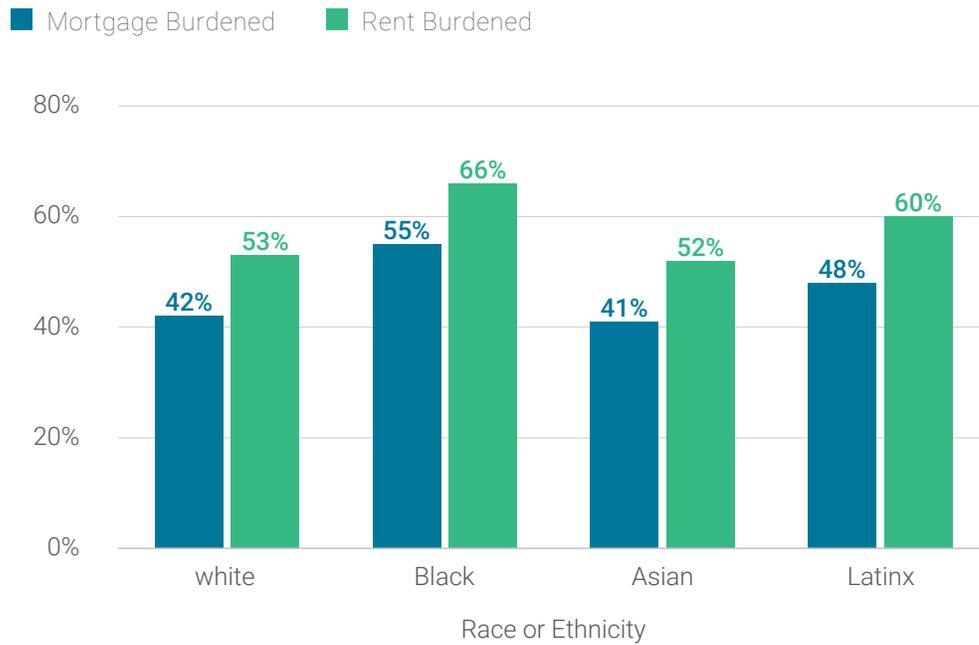
Source: 2019 ACS 1-Year Summary

Chart 1.1.2: Percentage of Severely Overcrowded Households by Race/Ethnicity



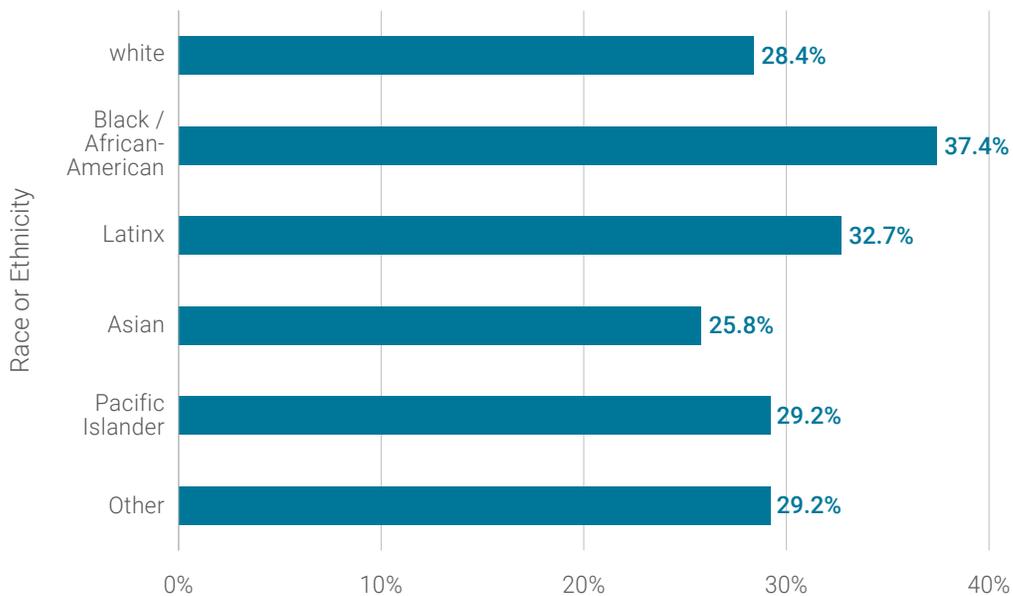
Source: 2019 ACS 1-Year Summary

Chart 1.1.3: **Rent Burdened and Mortgage Burdened**



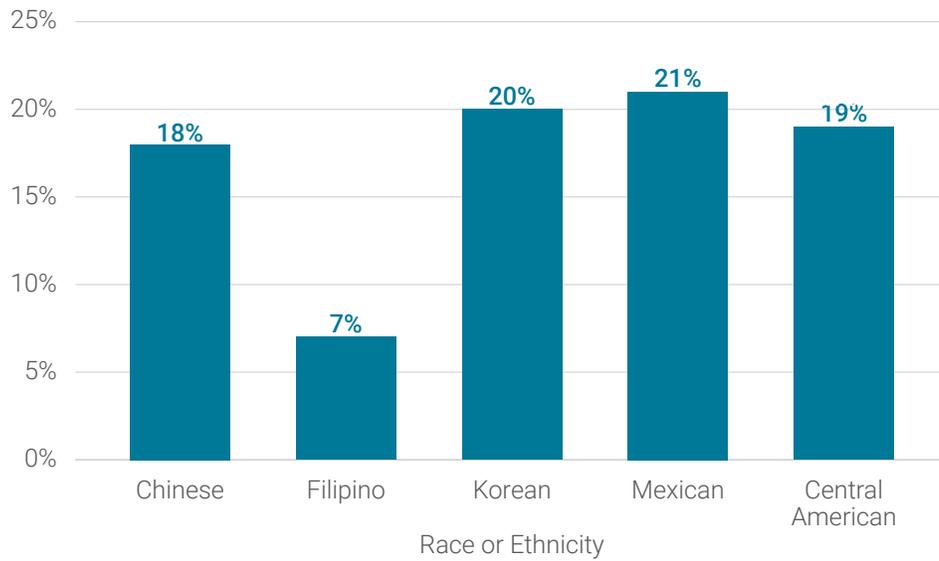
Source: 2019 ACS 1-Year Summary

Chart 1.1.4: **City of Los Angeles Renter Occupied Severe Housing Cost Burden**



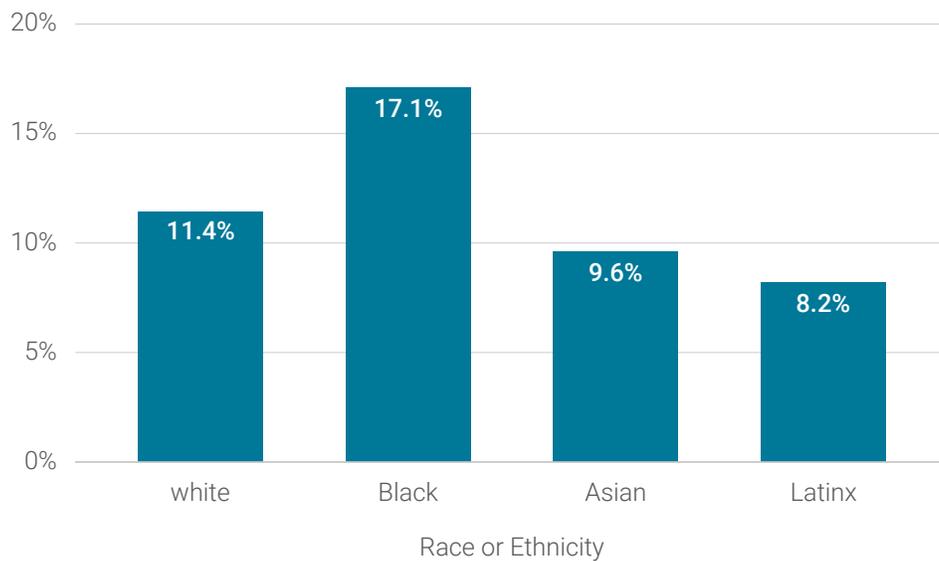
Source: 2019 ACS 1-Year Summary

Chart 1.1.5: **Percent of People in Poverty by Ethnicity**



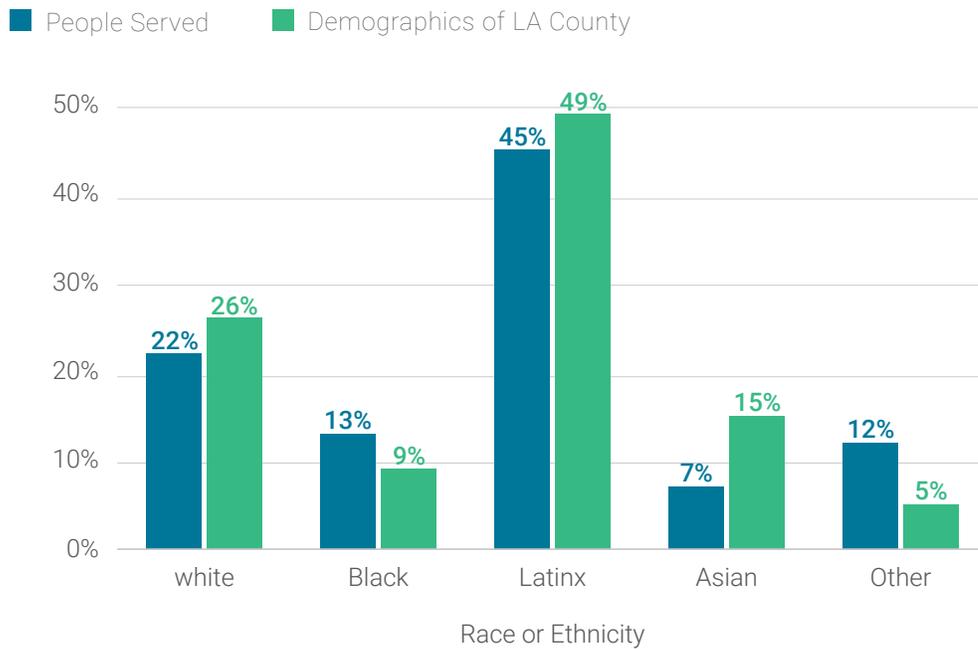
Source: 2019 ACS 1-Year Data

Chart 1.1.6: **Percent of Population with a Disability**



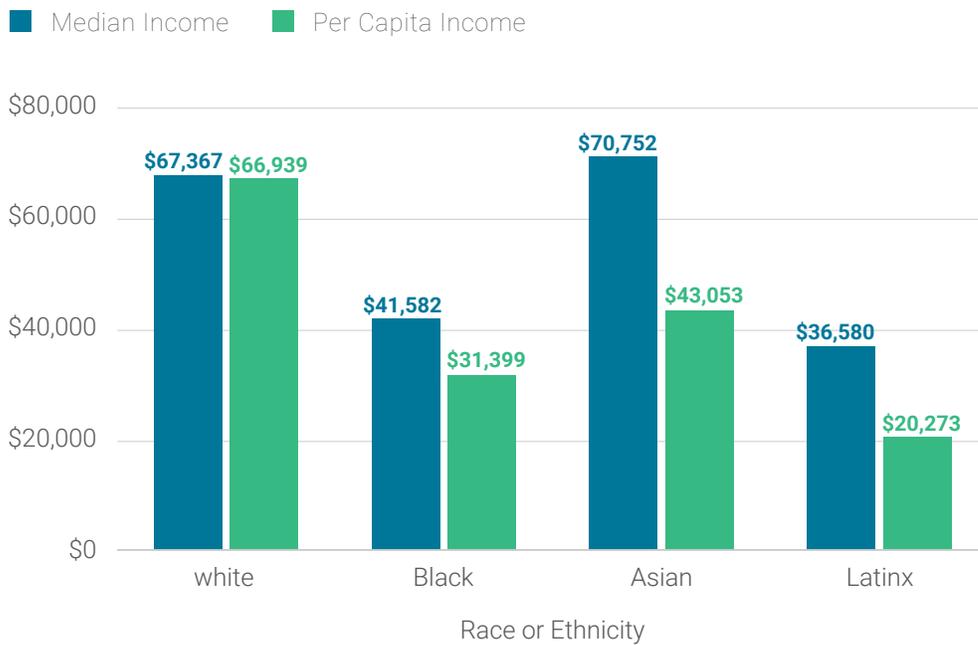
Source: 2019 ACS 1-Year Summary

Chart 1.1.7: Racial Demographics of People Served by Regional Centers Compared to Overall Population, LA County



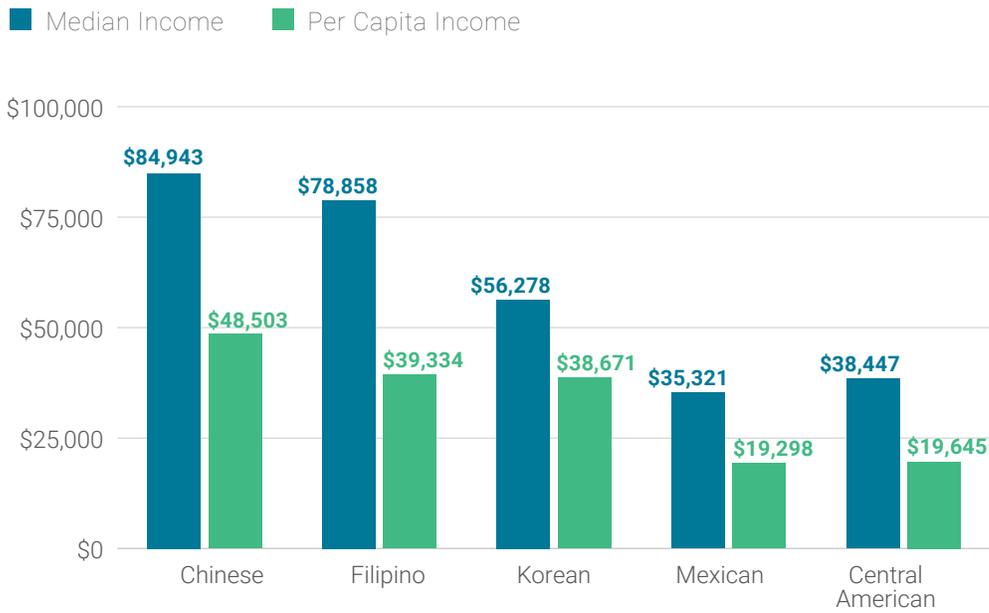
Source: 2019 ACS 1-Year Summary

Chart 1.1.8: Median Income and Per Capita Income by Race/Ethnicity



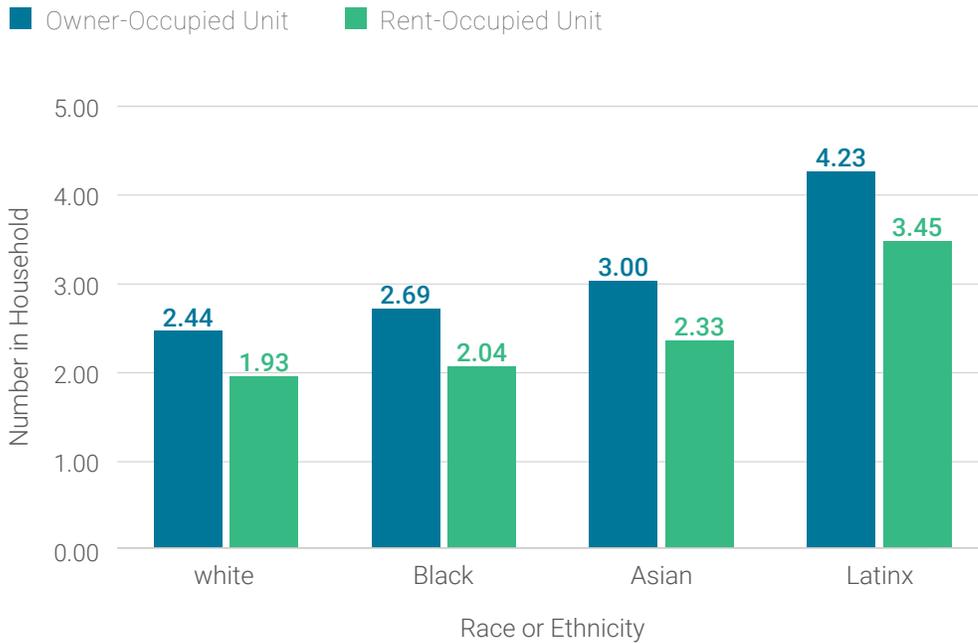
Source: 2019 ACS 1-Year Summary

Chart 1.1.9: Median Income and Per Capita Income by Ethnicity



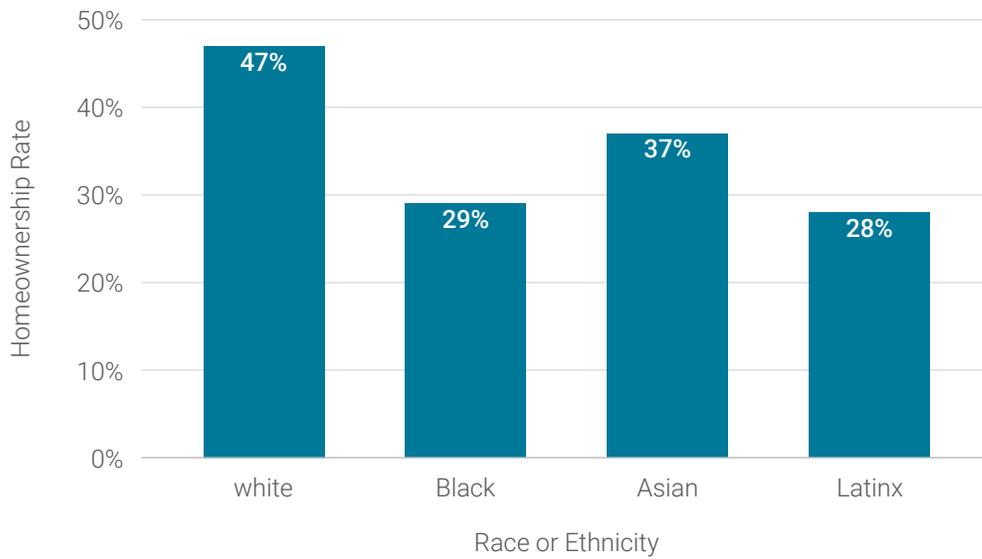
Source: 2019 ACS 1-Year Data

Chart 1.1.10: Average Household Sizes



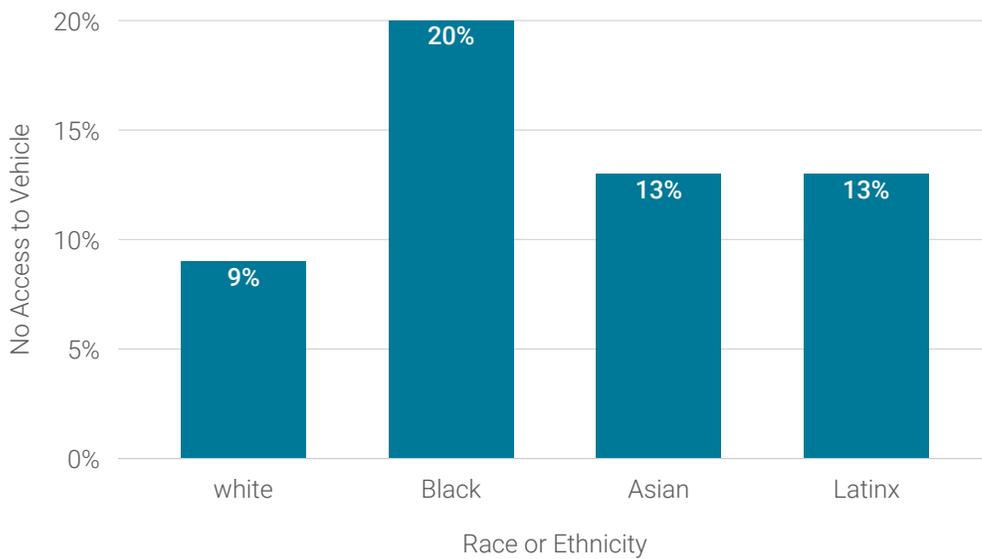
Source: 2019 ACS 1-Year Summary

Chart 1.1.11: Homeownership Rates by Race/Ethnicity



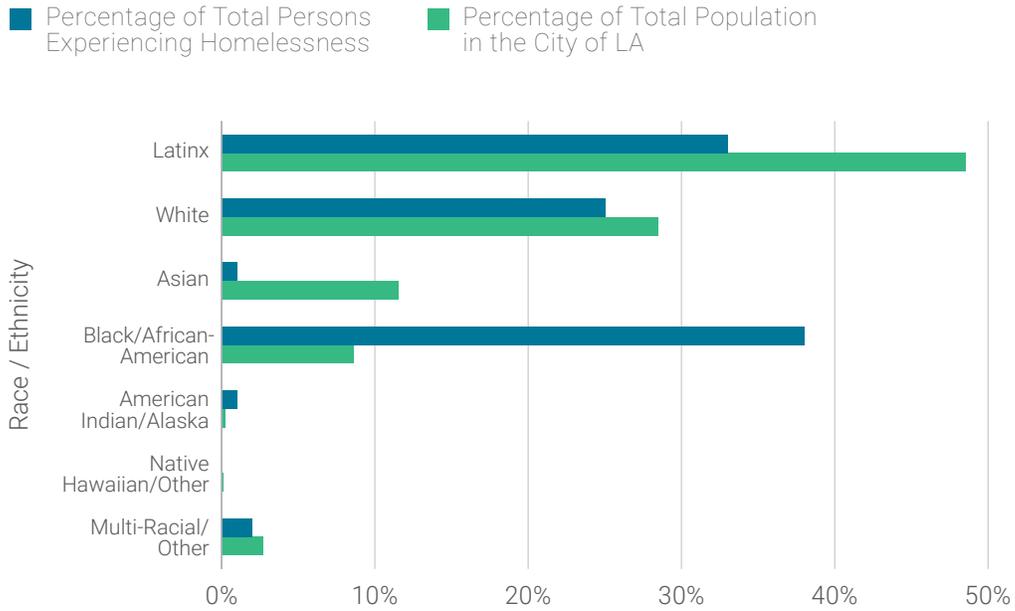
Source: 2019 ACS 1-Year Summary

Chart 1.1.12: No Access to Vehicle



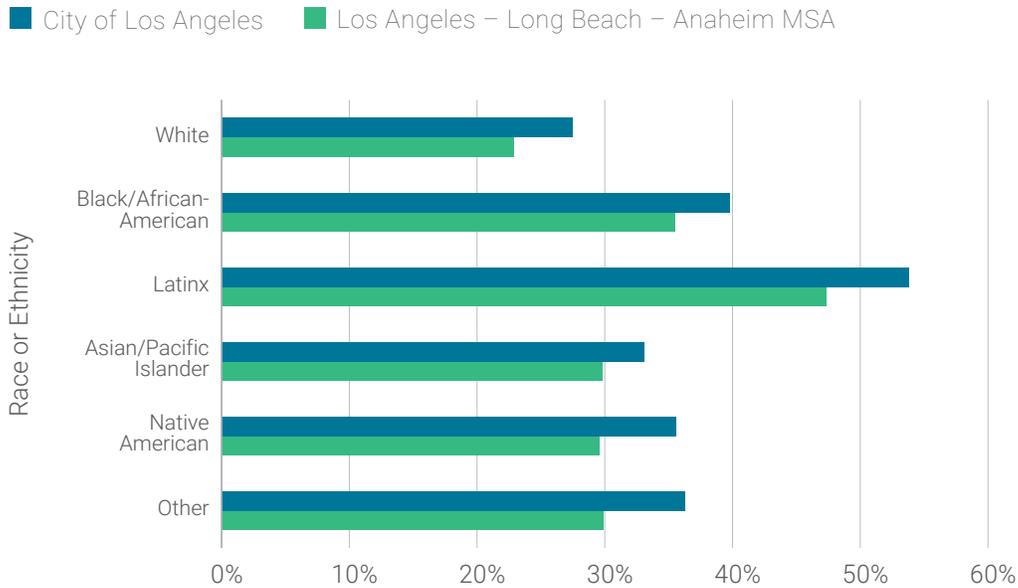
Source: 2019 ACS 1-Year Summary

Chart 1.1.13: Persons Experiencing Homelessness in the City of LA



Source: 2020 LAHSA Homeless Count

Chart 1.1.14: Households Facing Severe Housing Problems by Race & Ethnicity



Source: CHAS; Note: All percentages represent a share of the total population within the jurisdiction or region.

Changes in Population Growth by Race

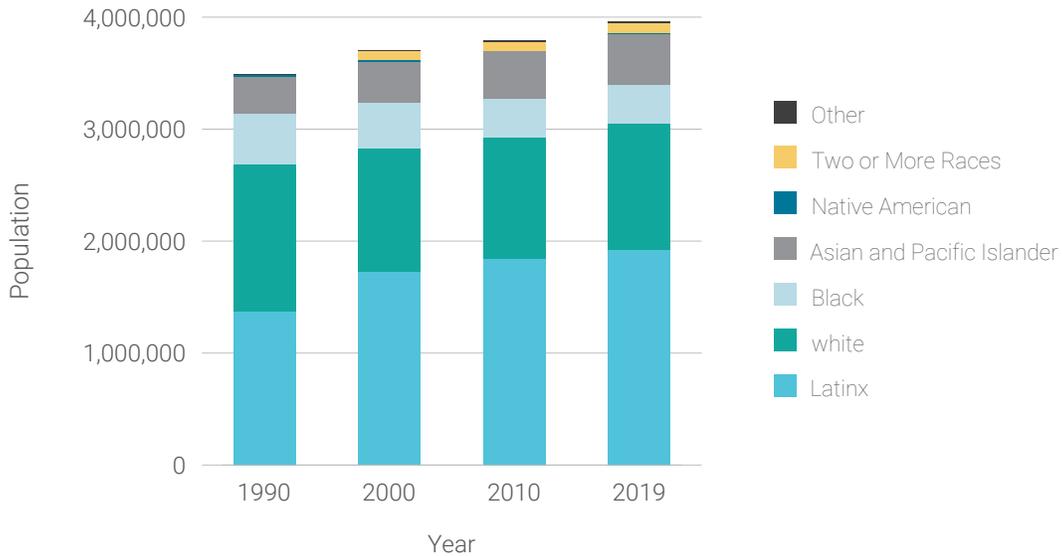
From 1990 to 2019, the population growth rate of the City of Los Angeles was 12%, with a current estimate of over 3.9 million residents. As seen in Table 1.1.1 and Chart 1.1.15 this growth is due in large part to increases in Latinx and Asian/Pacific Islander residents as well as those who identify as Other or Mixed-Race, despite decreases of both white and Black residents. Over 1.9 million Angelinos are Latinx, or 48.5% of the total population.

Table 1.1.1: Population Growth Rate of Race and Ethnicity – City of Los Angeles

	Growth Rate
Total Population	12.0%
Hispanic or Latinx	28.6%
white	-15.9%
Black	-35.0%
Asian and Pacific Islander	28.4%
Native American	-54.5%
Two or More (Mixed) Races *	90.1%
Other	37.1%

** The US Census Bureau did not begin to include this category until the 2000 US Decennial Census. The rate of change for this category is between the years 2000 and 2019*

Chart 1.1.15: **Change in Race and Ethnicity Over Time – LA City**



Source: 2019 ACS 1-Year Summary

Segregation Patterns by Race and Ethnicity

Los Angeles, with its immense diversity remains one of the most segregated cities in the nation. This section uses a variety of indicators and analysis to illustrate the extent of racial and ethnic segregation in the city. Racial segregation and economic segregation, which is discussed later, are highly correlated. Research shows that economic factors alone do not account for the extent of racial segregation in the city.⁷ Rather, ethnoracial segregation results from a combination of historic racial exclusion through redlining, restrictive covenants, other racially discriminatory housing practices along with continued patterns of economically exclusionary land use and economic disinvestment.

Population Distribution by Race

The following maps display the distribution of each racial group with each dot representing 500 people. As shown in Map 1.1.1, the Latinx population is the most dispersed of any racial group and nearly 90% of all census tracts in the city include at least 10% of Latinx people. The only areas without a sizable Latinx population are located in West LA and the Northwest Valley, which include West Hills, Woodland Hills, Pacific Palisades, Tarzana, Encino, Studio City, Brentwood, Bel Air, Beverlywood, and the

7. Paul Ong et al., "Race, Ethnicity, and Income Segregation in Los Angeles" (UCLA Center for Neighborhood Knowledge, June 2016), https://knowledge.luskin.ucla.edu/wp-content/uploads/2018/01/Race-Ethnicity-and-Income-Segregation-Ziman_2016.pdf

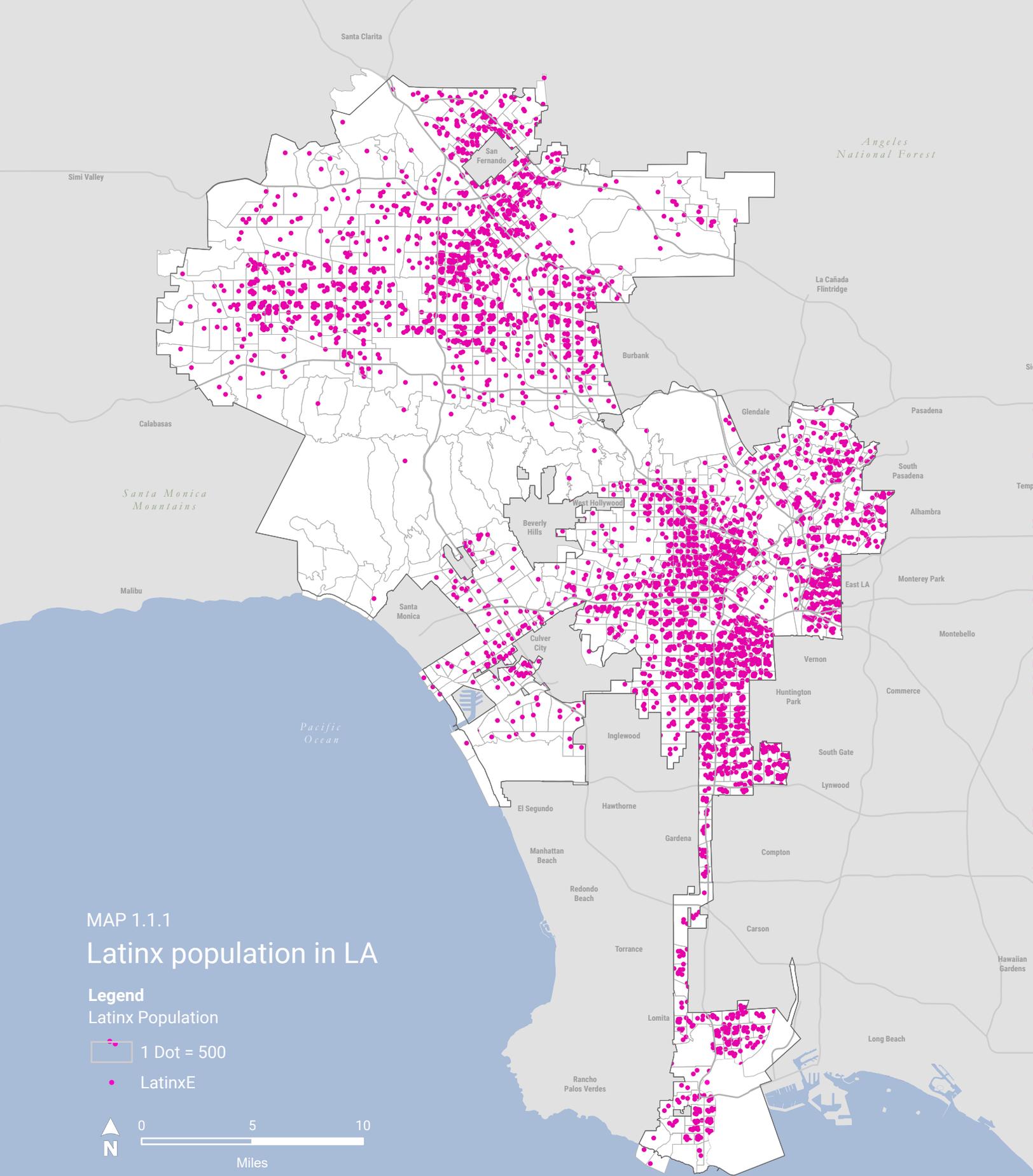
Hollywood Hills as well as Century City, Cheviot Hills, Beverlywood, Pico-Robertson, Beverly Grove, Hancock Park and Los Feliz.

While Latinx people live throughout the city, the highest concentrations of Latinx people are in the San Fernando Valley, East Los Angeles, and South Los Angeles. Within the San Fernando Valley, Mission Hills, Sun Valley, Panorama City, North Hills, and Van Nuys all have census tracts with Latinx populations over 50% and Pacoima, Sylmar, and Arleta have Latinx populations exceeding 75% of all residents. In Northeast LA, the neighborhoods of Highland Park, Montecito Heights, Cypress Park, El Sereno, Lincoln Heights, and Boyle Heights, all have Latinx populations exceeding 75%, as do areas in Central and South LA including Westlake, Pico Union, Central-Alameda, Historic South Central, Adams-Normandie, Exposition Park, South Park, Vermont Square, Vermont-Slauson, Florence, Watts, Green Meadows, Broadway-Manchester, and Vermont Vista. Wilmington and San Pedro in the South Bay are also over 75% Latinx.

White residents are highly concentrated in West LA and the South San Fernando Valley, with smaller notable concentrations of white residents living throughout the San Fernando Valley, Downtown, Northeast LA, and the Harbor area. The areas with the greatest concentrations of white people include the neighborhoods of West Hills, Woodland Hills, Tarzana, Pacific Palisades, Encino, Brentwood, Sherman Oaks, Bel Air, Beverly Crest, Studio City, Hollywood Hills, Westwood, Century City, as well as Venice and Playa Del Rey along the coast. Parts of Tujunga, Sunland, and Lake View Terrace in the northern most edges of the City are also majority white. There are fewer than 500 white residents living in most areas of South and Southwest LA and Boyle Heights.

Black Angelinos live throughout the Valley, the Westside, Downtown, Hollywood, and Harbor area, with South Los Angeles historically having the highest concentration of Black residents in the city. The neighborhoods of Baldwin Hills/Crenshaw, Leimert Park, Manchester Park, Gramercy Park, and Westchester all have Black populations exceeding 50% (see Map 1.1.4). There are very few Black residents living in Boyle Heights or Northeast LA. There are also very few Black residents in the hillside areas like Pacific Palisades, Brentwood, Bel Air, Beverly Crest, Tarzana, Encino, and Sherman Oaks.

Asian residents live throughout West LA, the Valley, Northeast LA and the Harbor area, with the greatest number of Asian residents living near Koreatown, Downtown, Chinatown, Lincoln Heights, Playa Vista, Porter Ranch, North Hills, Westwood near UCLA and Exposition Park near USC. Parts of Montecito Heights, Porter Ranch, and the Harbor area also have Asian populations exceeding 40%. There are very few census tracts south of USC in South LA with more than 500 Asian residents.

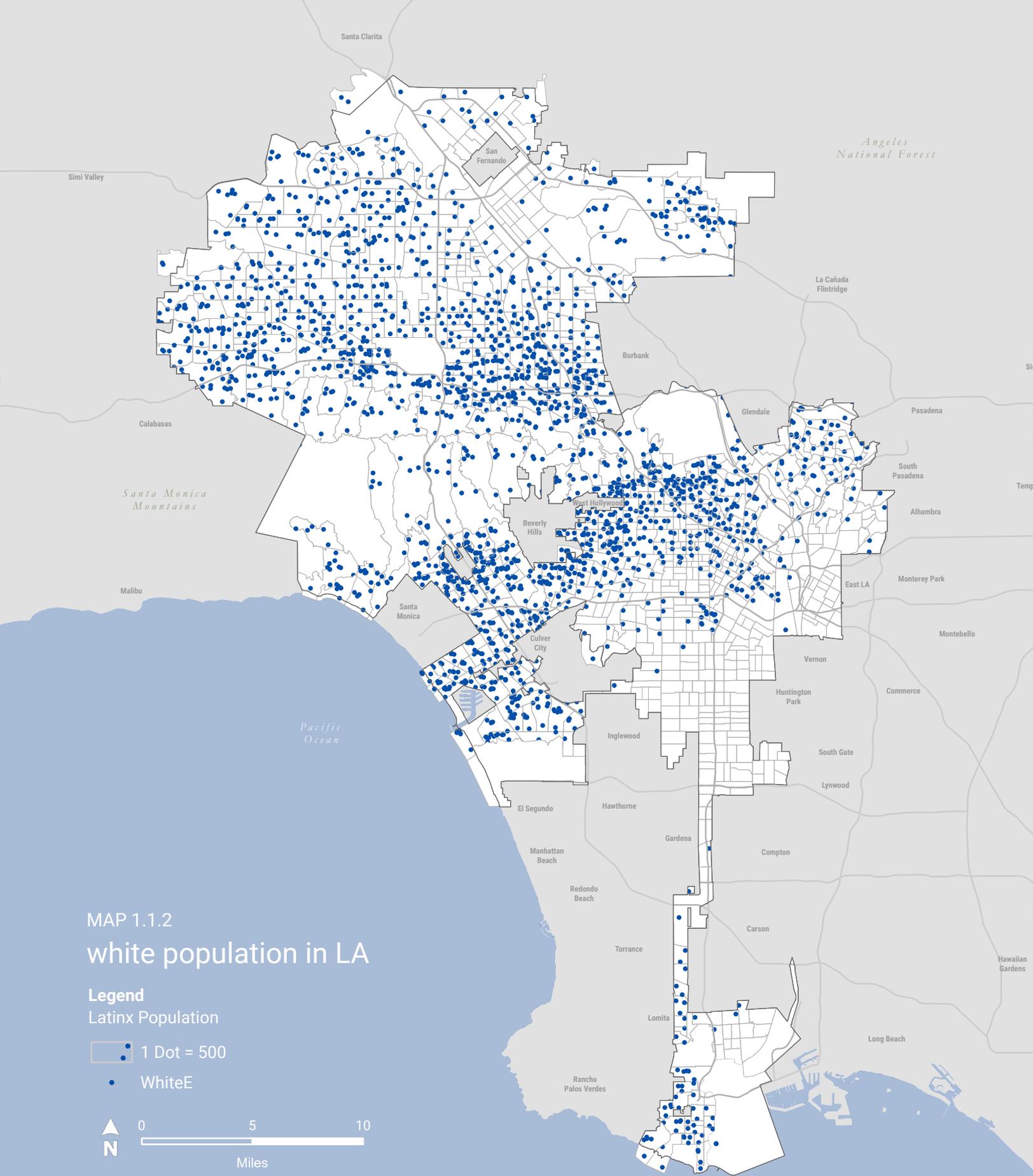


MAP 1.1.1
 Latinx population in LA

Legend
 Latinx Population
 1 Dot = 500
 • LatinxE



Source: ACS 2019 5-year summary data

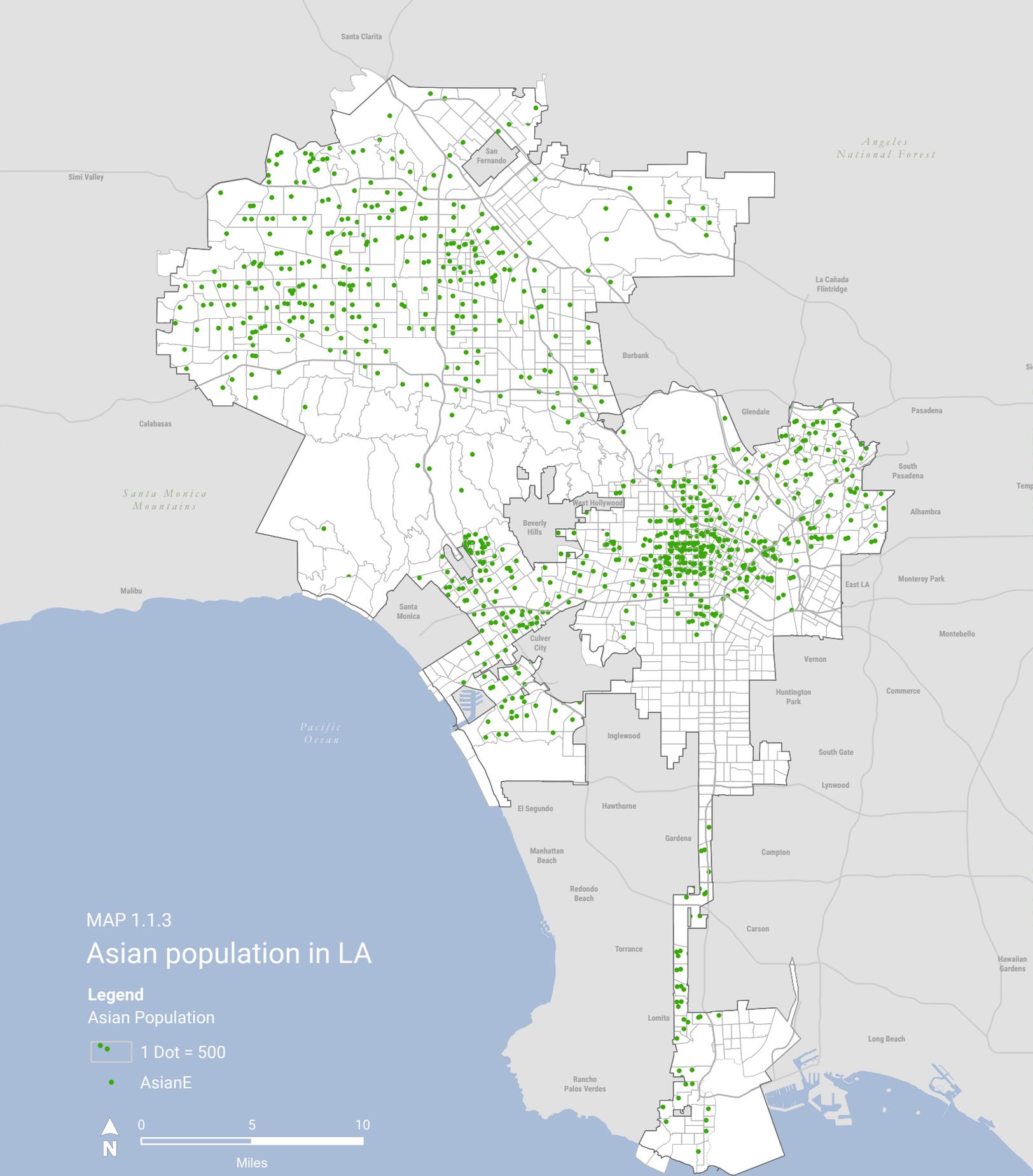


MAP 1.1.2
white population in LA

Legend
 Latinx Population
 1 Dot = 500
 • WhiteE



Source: ACS 2019 5-year summary data



MAP 1.1.3
Asian population in LA

Legend
Asian Population

- 1 Dot = 500
- AsianE



Source: ACS 2019 5-year summary data

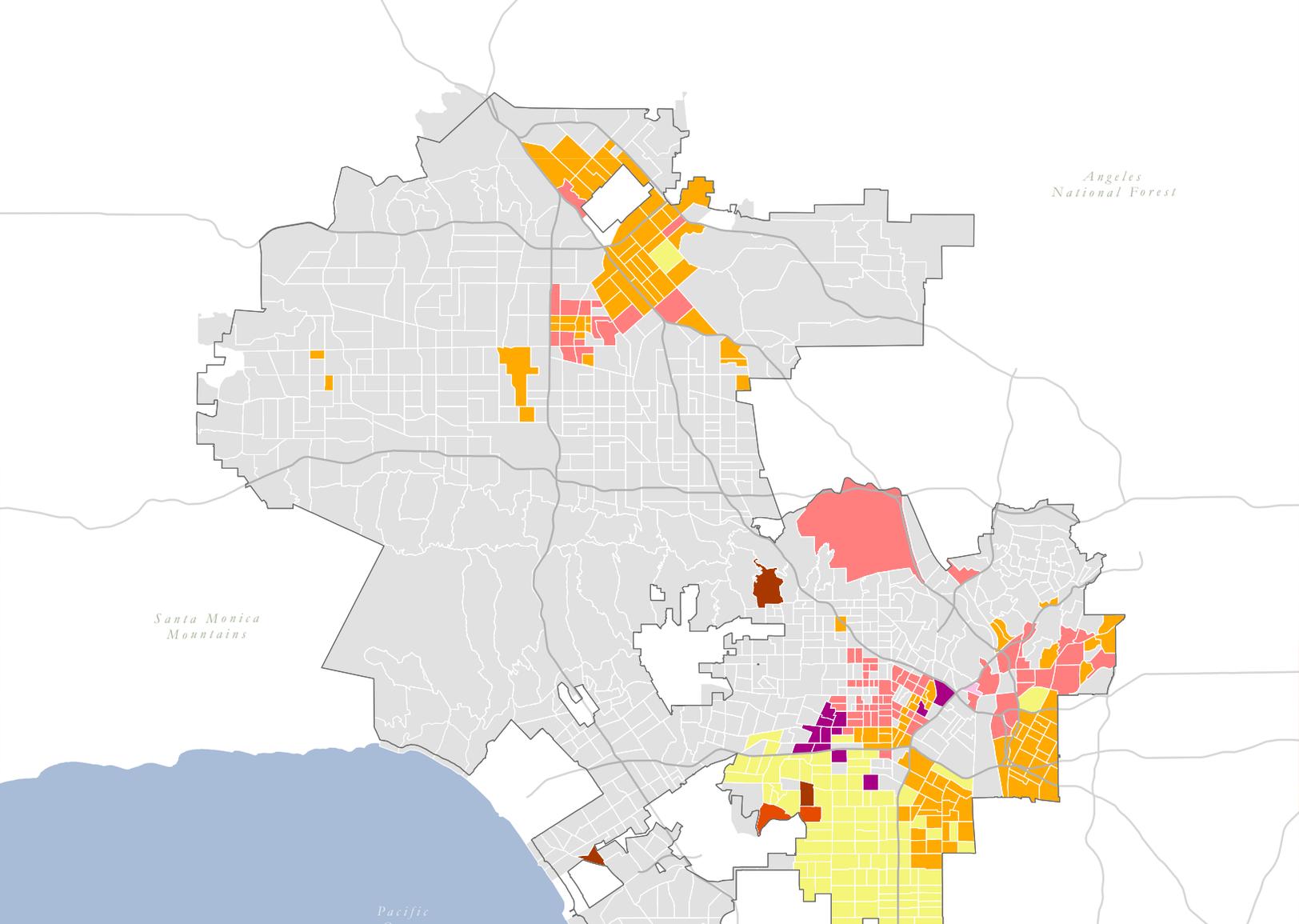
Analysis of HCD-Designated Racial Neighborhood Types

Datasets provided by HCD included a categorization of each census tract in the city based on the prevalence of each racial and ethnic group. Analyzing this data reveals the complex and nuanced mosaic of integration and segregation patterns in the city. The categories listed in Table 1.1.2 are based on the concentration of one or more racial and ethnic groups relative to their total population in the city.

Table 1.1.2: Categorization of Census Tracts in the City of LA Based on Racial and Ethnic Groups

Neighborhood Category	Number of Census Tracts	Percent of Census Tracts
Asian-Latinx-white	264	20.9%
Latinx-white	195	15.5%
Mostly Latinx	132	10.5%
Black-Latinx	124	9.8%
Asian-Latinx	78	6.2%
Mostly white	52	4.1%
4 Group Mixed/Diverse	42	3.3%
Asian-white	39	3.1%
Black-Latinx-white	31	2.5%
Black-Asian-Latinx	15	1.2%
Black-white	3	0.2%
Other-white	3	0.2%
Mostly Black	2	0.2%
Black-Asian-white	1	0.1%
Mostly Asian	1	0.1%

Source: HCD Neighborhood Typologies and 2019 American Community Survey 5-Year Data Summary



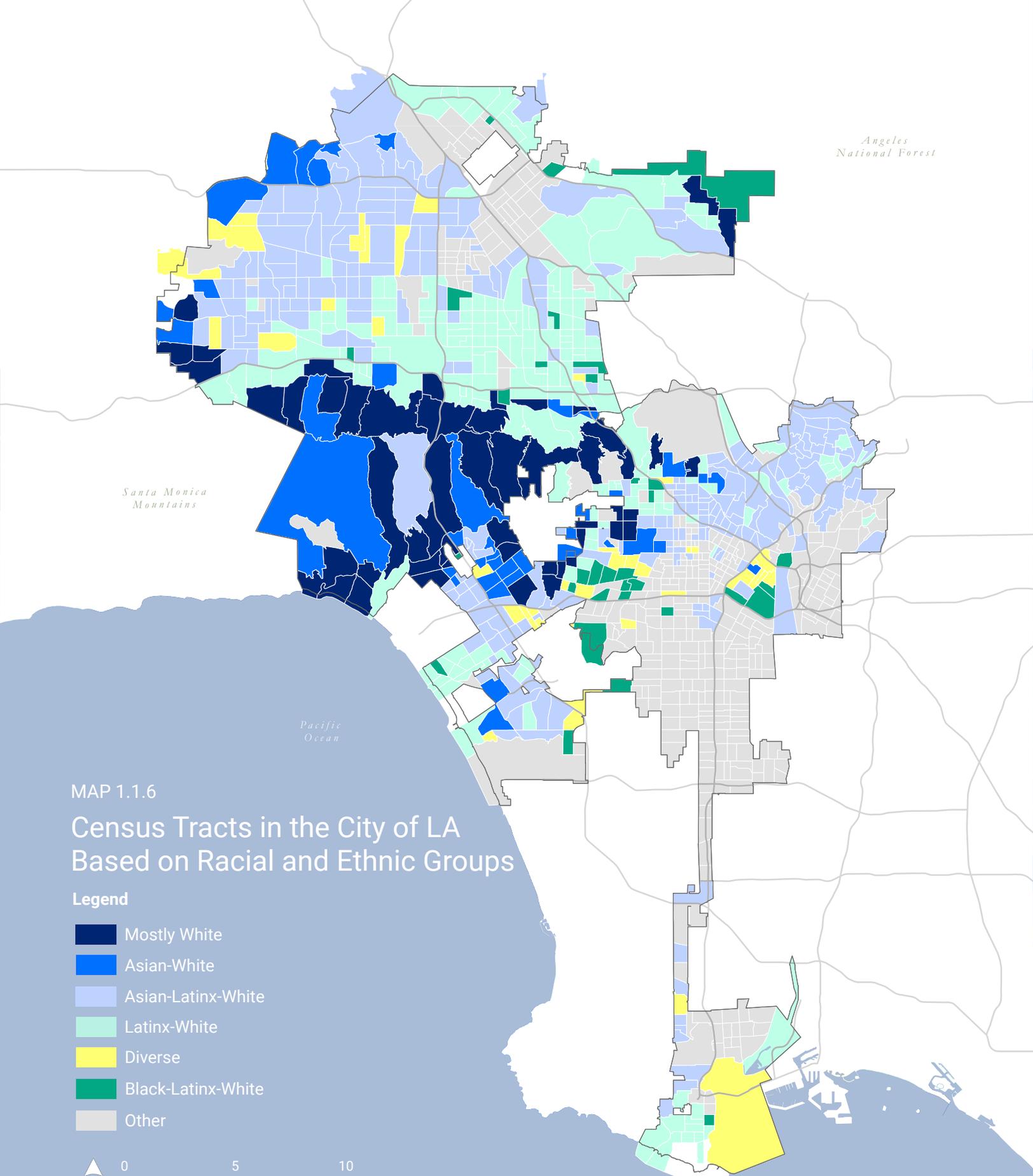
MAP 1.1.5

Concentration of Racial and Ethnic Group Categories in LA

Legend

- Black-Latinx
- Mostly Latinx
- Asian-Latinx
- Black-Asian-Latinx
- Black-White
- Mostly Asian
- Mostly Black
- Other





Angeles National Forest

Santa Monica Mountains

Pacific Ocean

MAP 1.1.6
 Census Tracts in the City of LA
 Based on Racial and Ethnic Groups

Legend

- Mostly White
- Asian-White
- Asian-Latinx-White
- Latinx-White
- Diverse
- Black-Latinx-White
- Other



Sources: HCD Neighborhood Typologies, ACS 2019 5-Year Summary Data

Overall, most of the neighborhoods in Los Angeles are racially mixed, with only 15% of census tracts in the city are predominantly one race. Of these racially-concentrated areas, the vast majority are predominantly Latinx, which correlates with Latinx being the largest Racial/Ethnic group in the city. There are over 132 census tracts that are considered mostly Latinx, most of which are located in the Northeast San Fernando Valley, Southeast LA, East LA, and Wilmington. Mostly white neighborhoods are the second most common of the racially concentrated census tracts. These 52 census tracts are primarily located in the hillside areas between West LA and the Southern San Fernando Valley (including Pacific Palisades, Brentwood, Bel Air, Beverly Crest, Woodland Hills, Tarzana, Encino, Sherman Oaks, Studio City and the Hollywood Hills). Parts of Central and West LA including parts of Los Feliz, Fairfax, Hancock Park, Beverly Grove, Cheviot Hills, Beverlywood, Pico-Robertson are also considered mostly white. The northern portion of Chinatown (east of the Chinatown metro station) is the only neighborhood in the city considered mostly Asian and the only two areas considered mostly Black are Leimert Park and Baldwin Hills.

The majority of neighborhoods in the City of Los Angeles include a mix of Asian, Latinx and white residents, most notably seen in the San Fernando Valley, Northeast LA, Central LA, West LA, and the South Bay. Examples of San Fernando Valley neighborhoods that meet this definition (Asian-Latinx-white) include parts of Chatsworth, Porter Ranch, Granada Hills, Mission Hills, Canoga Park, Winnetka, Northridge, North Hills, Panorama City, Sun Valley, Sunland, Tujunga. In East/Northeast LA neighborhoods include East Hollywood, Silverlake, Echo Park, Elysian Park, Montecito Heights, Mount Washington, Glassell Park, and Eagle Rock and in Central LA Larchmont, and parts of Koreatown, Mid-Wilshire, Downtown, and the areas around Exposition Park all fall into this category. Several areas of West LA including parts of Brentwood, Westwood, Sawtelle, Mar Vista, Del Rey, Playa Vista, and Westchester are also included in this neighborhood type, as are areas of the South Bay near Torrance, Gardena, Lomita, and San Pedro.

The Asian-Latinx-white neighborhoods are directly adjacent to two other common neighborhood types, white-Latinx and Asian-Latinx. White-Latinx neighborhoods, which make up 20% of the city's neighborhoods, are primarily located in the San Fernando Valley neighborhoods of Sylmar, Sunland, Shadow Hills, Sun Valley, North Hollywood, Valley Glen, Van Nuys, Reseda, Woodland Hills, Tarzana, Sherman Oaks, and Studio City. There are also a few neighborhoods in the central, western, and southern area of the city near Hollywood, Los Feliz, Echo Park, Beverly Grove, Venice, and San Pedro. Latinx-Asian neighborhoods, which represent 8% of the city, include parts of Panorama City, Chinatown, Lincoln Heights, Koreatown, Westlake, and parts of the Southbay and San Pedro.

Black-Latinx neighborhoods are the fourth most common neighborhood type and are located nearly exclusively in South Los Angeles including West Adams, Jefferson Park, Exposition Park, Vermont Square, Vermont Knolls, Gramercy Park, Broadway-Manchester, Green Meadows and Watts.

Other less common neighborhood types include: 4-Group Mix or Diverse areas (4% of the city's neighborhoods), Asian-white neighborhoods (4%), and Black-Latinx-white areas (3%) and Black-Asian-Latinx (2%). Diverse neighborhoods that include a mix of all four racial groups are located in the Northwest San Fernando Valley (near Chatsworth and Northridge), Central and West LA (including Downtown, Mid-Wilshire, Mid-City and Palms), and the eastern part of San Pedro. Asian-white areas are primarily located near mostly white neighborhoods in West and Central LA such as Pacific Palisades, Westwood, Hancock Park, Beverly Grove, and Los Feliz, but are also present in the Northwest Valley and Del Rey/Playa Vista. The 31 Black-Latinx-white majority areas are scattered throughout the city but most concentrated in Downtown, Mid-City, Southwest LA, Hollywood, and Northeast Valley. Lastly, Black-Asian-Latinx neighborhoods are primarily located in the Central City area in neighborhoods such as Westlake, Arlington Heights and Exposition Park, Harbor Gateway, and San Pedro.

Measuring Segregation

Dissimilarity Index

The dissimilarity index assesses the extent of segregation between two groups across geographies by looking at census tracts. The index ranges from 0 to 100, with 0 meaning no segregation and 100 indicating complete segregation. The number can be interpreted as the percentage of people from either ethno-racial group that would have to move to another neighborhood to achieve fully integrated neighborhoods. For example, if the dissimilarity index between white and Black residents is 50, it would mean 50% of either group would need to relocate to other census tracts for full integration. According to guidance from HCD, an index score above 60 is considered high, a score between 30–60 is considered moderate, and a score below 30 is considered low.

Based on the 2018 American Community Survey data, the overall dissimilarity index between white and non-white city residents is 55.74, suggesting moderate segregation patterns across the city (see Table 1.1.3). When comparing by selected racial and ethnic groups, Black/white and Latinx/white segregation are high, with indices of 66.05 and 63.32, respectively. Asian or Pacific Islander/white segregation is considered moderate. When dissimilarity indices with county and metro area, the city has a slightly higher Latinx/white dissimilarity and slightly lower Asian Pacific Islander/white dissimilarity.

Table 1.1.3: **Dissimilarity Index Between White and Non-White Residents**

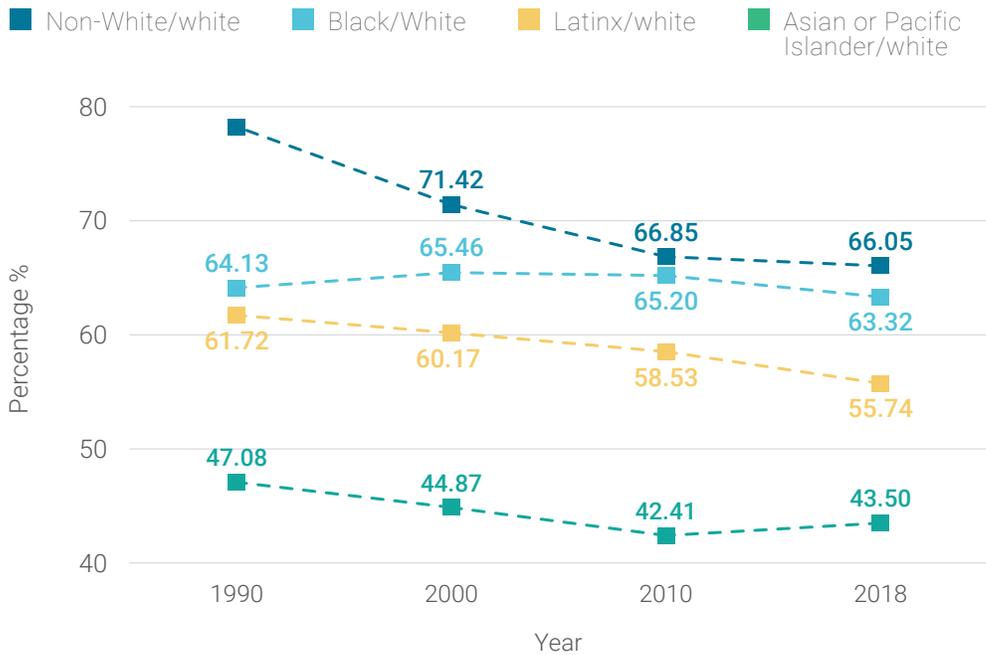
	Dissimilarity Index		
	LA City	LA County	LA Metro
Non-white/white	55.74	52.35	49.77
Black/white	66.05	65.51	66.27
Latinx/white	63.32	62.36	60.99
Asian or Pacific Islander/white	43.50	50.07	47.92

Source: 2018 American Community Survey

Dissimilarity indices for all racial groups have decreased steadily since 1990 as shown in the chart below, although dissimilarity for white/Asians increased slightly between 2010 and 2018. The decrease is particularly significant for white/non-white segregation which declined by nearly 10% from 1990 to 2018 (from 61.72 to 55.74) and for Black/white segregation which declined by nearly 16% (78.24 to 66.05). While the decrease in Black/white segregation indicates the city is becoming more integrated, this integration may be correlated to the decrease in Black population that has occurred since 1990. In 1990, the nearly 500,000 Black residents comprised over 17% of the city’s population. Between 1990 and 2018, the total Black population decreased by nearly 120,000 (from approximately 461,000 to 342,000) and the share of the city that identifies as Black is now just 8.6%.

The Latinx/white dissimilarity index has only declined by a little over 1% since 1990. This suggests that despite the significant increase in the number and percent of Latinx residents in the city, there is not significantly more residential integration between white and Latinx residents than there was nearly 30 years ago.

Chart 1.1.16: **Dissimilarity Index 1990–2018**



Source: 2018 American Community Survey

Isolation Index

In addition to dissimilarity, segregation can also be measured through an “isolation index,” or the extent to which certain demographic groups live in proximity to others from the same racial demographic. Values for the isolation index range from 0–100 with 100 indicating the greatest level of isolation.

Among the four demographic groups analyzed, Latinx residents have the highest rates of isolation in both the city, county, and metro area at 65.3 and 65.8 and 64.6, respectively. This value demonstrates that the average Latinx resident in the city lives in a block group⁸ where their share of the population exceeds the overall citywide average by approximately 65.3%. The isolation index for the Latinx population has increased significantly every decade since 1980, indicating that residential segregation among Latinx people has become increasingly entrenched over time. After Latinx residents, the city’s white population exhibits the greatest rate of isolation at 52.4. It is important to note that while Latinx isolation has increased by 27% between 1980 and 2018, white isolation has declined by 28%. This decline may be due in part to the decrease in the

8. Block groups are clustered subsections within census tracts generally defined to contain between 600 and 3,000 people.

white population throughout the city over the last three decades, and similar decreases seen at the county and metro level.

Based on 2018 data, Black isolation in the city is 26.1, slightly lower than Black isolation countywide. Black isolation in the city has declined every decade, decreasing by nearly 61% from 1980 to 2018. The lower rate of Black isolation does not indicate improved conditions for this group but instead results from both the decrease in the Black population as discussed earlier, and the influx of Latinx residents into South LA's once majority Black neighborhoods beginning in the 1980s.⁹ Black isolation is slightly higher in the county and the metro area than within the City of Los Angeles.

Finally, Asian/Pacific Islander residents face the least isolation among all groups at an index rate 22.7. Compared with the county and the metro region, LA City has a significantly lower rate of Asian/Pacific Islander isolation. Since 1980, the isolation index for Asian/Pacific Islander residents in the city has increased every decade and between 1980 and 2018, representing an increase of 45%. The increase is due in part to an increase in the Asian population and the growth of Asian enclaves like Koreatown, Historic Filipinotown and Chinatown during this same time period.

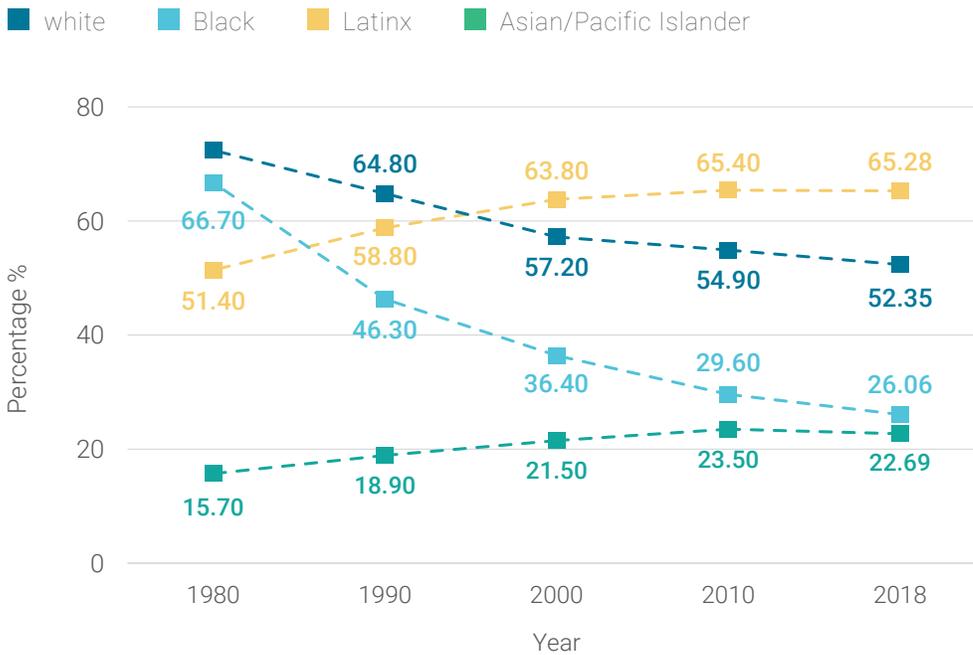
Table 1.1.4: Isolation index

	LA City	LA County	LA Metro
white	52.35	47.87	49.47
Black	26.06	25.86	24.5
Latinx	65.28	64.70	62.36
Asian	22.69	31.15	31.32

Source: 2018 American Community Survey

9. See pages 64-65 of the 2018–2023 Assessment of Fair Housing for more information.

Chart 1.1.17: Isolation Index 1980–2018



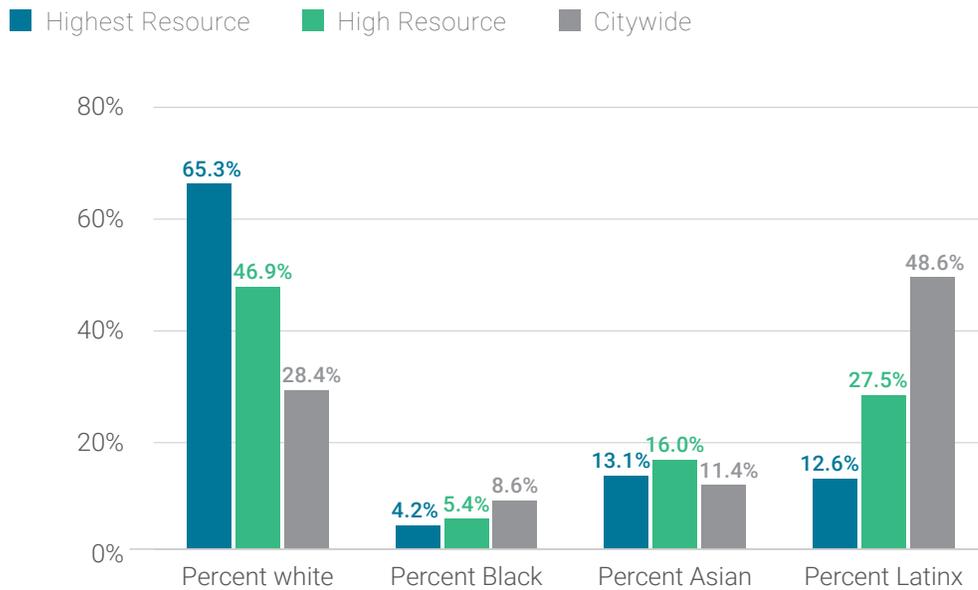
Source: 2018 American Community Survey

Access to Opportunity by Race and Ethnicity

Access to High Resource Neighborhoods by Race

According to HCD’s 2021 Opportunity Index, there are 334 High and Highest Resource census tracts in the City of Los Angeles out of a total of 1012 census tracts. These census tracts rank highest in a composite index of access to quality education, environmental health, and employment. Although white residents make up just over 28% of the total city population, white residents make up 65% of Highest Resource areas and 47% of High Resource areas (as shown in Chapter 4, Map 4.7). High and Highest Resource areas are concentrated in West Los Angeles and areas near the southern and western edge of the San Fernando Valley. Census Tracts within these high resource areas include Granada Hills, Porter Ranch, West Hills, Encino, Sherman Oaks, Hollywood Hills, Bel-Air, Westwood, Venice, Beverly Grove, Cheviot Hills, Beverlywood, Silverlake, Fairfax, Los Feliz, and Toluca Lake.

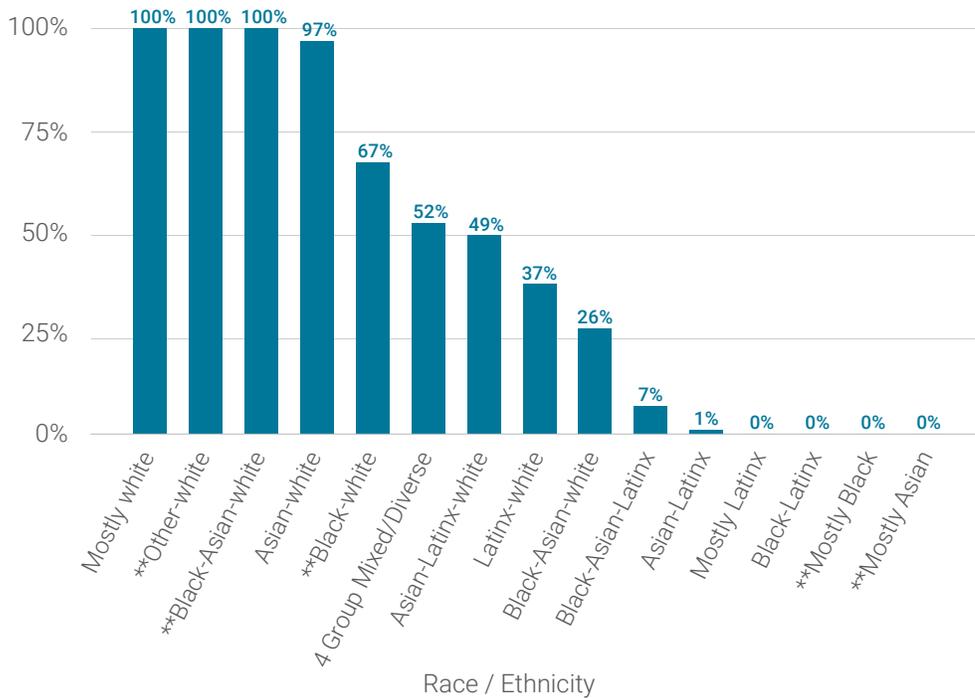
Chart 1.1.18: **Rent Burdened and Mortgage Burdened**



Source: 2020 Data HCD Data Portal

Analyzing the portion of high and highest resource areas by the neighborhood’s racial categories reveals an even greater disparity. As shown in Chart 1.1.19, all of the 52 Majority-white census tracts and 95% of the 38 Asian-white census tracts are High or Highest Resource compared to none of the Mostly Black and Black-Latinx census tracts and just 1% of the Asian-Latinx and Mostly-Latinx tracts. Due to the historic and ongoing restrictive and exclusionary land use practices described previously, BIPOC residents have significantly less access to high opportunity neighborhoods compared with white residents in the city.

Chart 1.1.19: **Percent High & Highest Resource by Neighborhood Category**



Source- 2020 Data HCD Data Portal **There are less than five census tracts in the City that fall into this category

Prevalence of Racially Concentrated Areas of Affluence

Research by the University of Minnesota and published by HUD calls upon jurisdictions to not only examine low-income communities of color as part of their fair housing analyses, but also identify high-income, majority white areas.¹⁰ The paper argues that analyzing areas of white affluence allows for fair housing assessments that better interrogate whiteness and the ways in which whiteness is continually rewarded and normalized through public policy and political narrative.

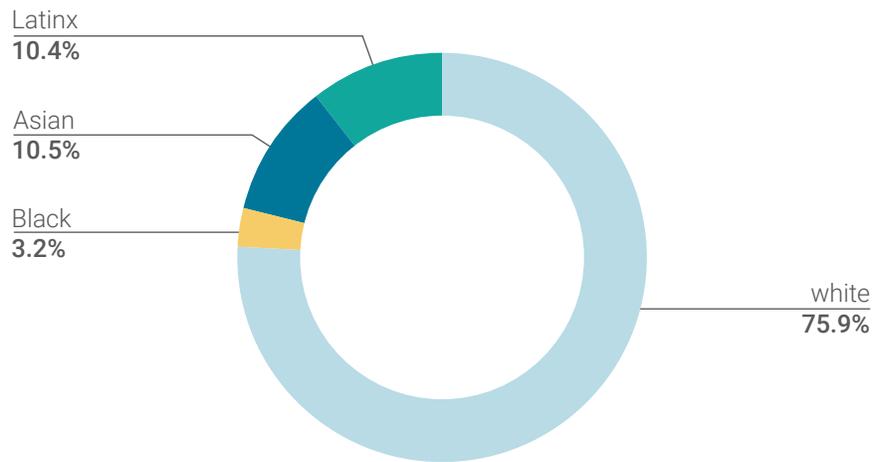
At the time of preparing this analysis, CA HCD had not decided on a final methodology to define Racially Concentrated Areas of Affluence (RCAA) for jurisdictions. For the purposes of this assessment in the City of Los Angeles, we have chosen to define RCAs as Census Block Groups with a median income greater than \$125,000 and are of more than 50% white. The \$125,000 income threshold is roughly double the median income of the city and the 50% white threshold represents significant concentration

10. Edward G. Goetz, Anthony Damiano, Rashad A. Williams "Racially Concentrated Areas of Affluence: A Preliminary Investigation," Cityscape: A Journal of Policy Development and Research, Volume 21, Number 1, 2019; <https://www.huduser.gov/portal/periodicals/cityscape/vol21num1/ch4.pdf>

since the population of the city overall is only 28% white. For a map of Racially Concentrated Areas of Affluence refer to Chapter 4.

The 183 census block groups that meet this definition are primarily concentrated in West LA and the Southern and Northern portions of the San Fernando Valley. More than two-thirds (76%) of residents in these areas are white and nearly one in five white residents (16%) live in a racially concentrated area of affluence.

Chart 1.1.20: **Demographics of Racially Concentrated Areas of Affluence**



Source: 2020 Data Portal

As detailed in Chapter 4, RCAAs are predominantly zoned for single-family homes and have some of the most expensive real estate markets in the region, however, many are also located in High Fire Severity Zones.

Prevalence of Racially Concentrated Poverty and Lower-Resource Areas

Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) is a category of neighborhood defined by the U.S. Department of Housing and Urban Development (HUD) to measure neighborhoods that experience both racial and ethnic concentration as well as high rates of poverty. According to HUD, R/ECAP Census Tracts must meet two criteria: (1) have a majority non-white population of over 50%, and (2) have 40% or more of individuals living at or below the poverty line, or have three or more times the

average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.¹¹

A comparison of the R/ECAP time series maps shows that concentrations of racial and ethnic poverty have proliferated over the years. In 1990, 30 census tracts qualified as R/ECAPs. By 2000 the number increased to 54, by 2010 to 77, and by 2017 104 census tracts qualified as R/ECAPs. As seen in Map 1.1.7, census tracts identified as R/ECAP in 1990 included parts of Watts, Florence, and other pockets of South Los Angeles that are historically Black communities. Other R/ECAPs included parts of the neighborhoods of Central-Alameda, Exposition Park, Adams-Normandie, Pico-Union, Westlake, Downtown, and Boyle Heights to the east.

Map 1.1.8 shows R/ECAPs in 2000, spreading from the decade prior. Neighborhoods in South, Central and East LA see an increase in census tracts identified as racially and ethnically concentrated areas of poverty, with new R/ECAPs in Wilmington by the Port of Los Angeles to the south, Baldwin Hills/Crenshaw, as well as Van Nuys and North Hills in the Valley. The R/ECAPs in the west LA neighborhood of Westwood are adjacent to the University of California, Los Angeles (UCLA) campus where a large, transient student population resides, and the Veterans Home of California, where a long-term, senior healthcare and assisted living facility for veterans is located.

In 2010, the growth of R/ECAPs continued from previously designated R/ECAPs as seen in Maps 1.1.7 and 1.1.8. Neighborhoods in Central LA, including Hollywood, East Hollywood, Chinatown and Lincoln Heights, San Pedro to the south, and additional neighborhoods in the Valley, such as Panorama City and Canoga Park, contain R/ECAPs. Parts of south and central LA shift in and out of R/ECAP designation, signifying a potential fluctuation in demographics or economic stability in the neighborhoods of Florence, Broadway-Manchester, Vermont Square, and Downtown.

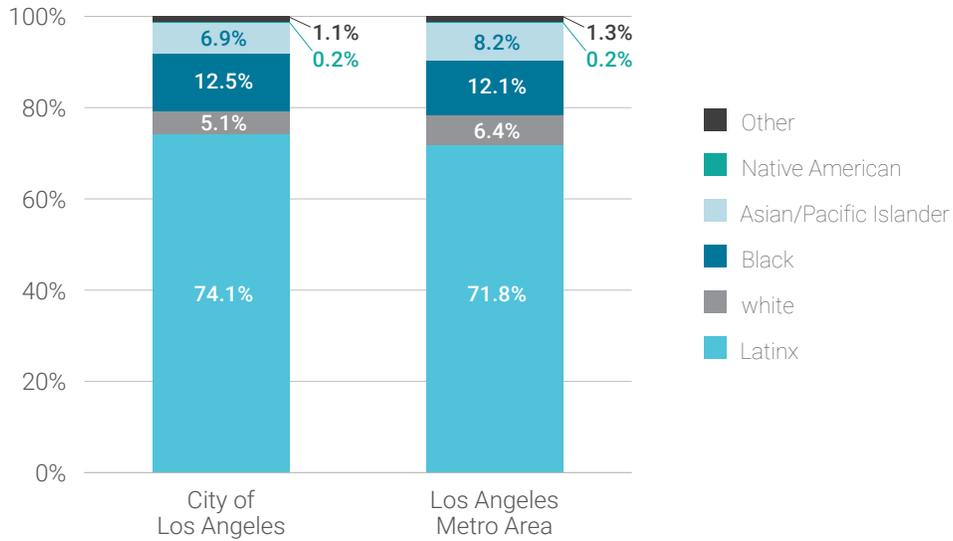
Based on the most recent designation of R/ECAPs by HUD in 2017, 10.4% of the population of the City of Los Angeles in 2019, or one in ten residents live in a R/ECAP.¹² Neighborhoods with new R/ECAPs include Elysian Park, Koreatown and Northridge. R/ECAPs in South LA, Central LA and East LA continue to spread, while parts of San Pedro and Downtown experienced a reduction in R/ECAPs. Chart 1.1.21 shows the racial and ethnic composition of R/ECAPs in the city, revealing a disproportionate majority, 74.1% of Hispanic or Latinx Angelinos reside in R/ECAPs compared to their overall share of the population at 48.5%. Similarly, Black Angelinos make up 8% of the population, and 12.5% of the population in R/ECAPs. The share of Asian and white Angelinos in R/ECAPs are smaller than the overall proportion of these populations in the city. Of Latinx residents

11. "Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)," arcgis.com (US Department of Housing and Urban Development (HUD), 2017), <https://www.arcgis.com/home/item.html?id=56de4edea8264fe5a344da9811ef5d6e>.

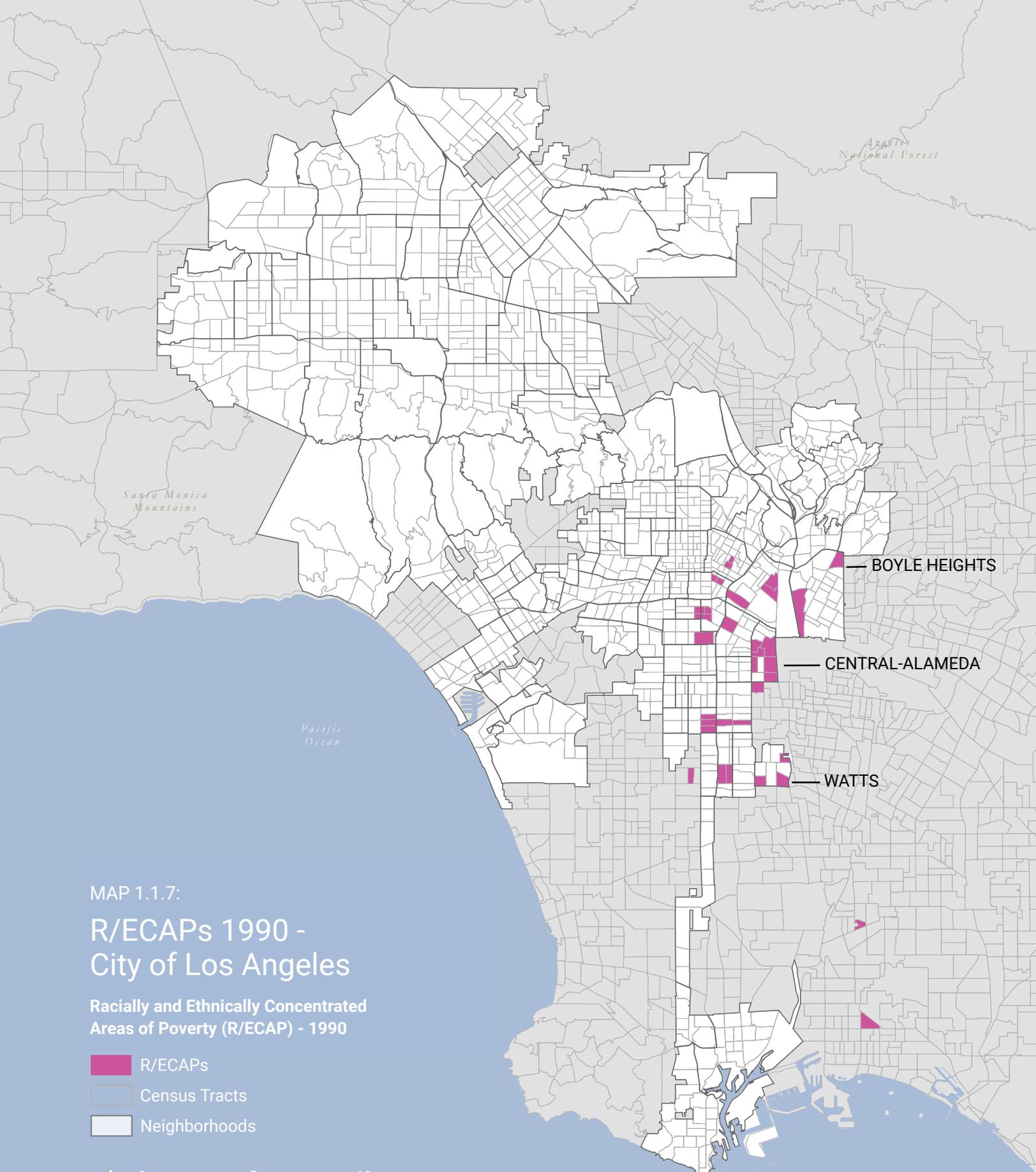
12. It is important to note that R/ECAP trends in the City of Los Angeles show patterns of growth. The most recent measurements of racially and ethnically concentrated areas of poverty completed by HUD in 2017 can be considered a conservative estimate when applied to 2019 demographic estimates and taking into account the COVID-19 pandemic.

who live in R/ECAPs, the most common nationalities include Mexican, Salvadoran, Guatemalan, Honduran and Nicaraguan. Among Asians, the most prominent nationalities include Chinese, Korean, Filipino, Indian and Japanese. In addition, 36.1% of residents in R/ECAPs were born outside of the U.S. and 27.6% are not U.S. citizens, a significant proportion compared to 21.8% and 14.0% of the total population, respectively.

Chart 1.1.21: Percent of Each Racial Group in R/ECAP



Source: HUD R/ECAP Data



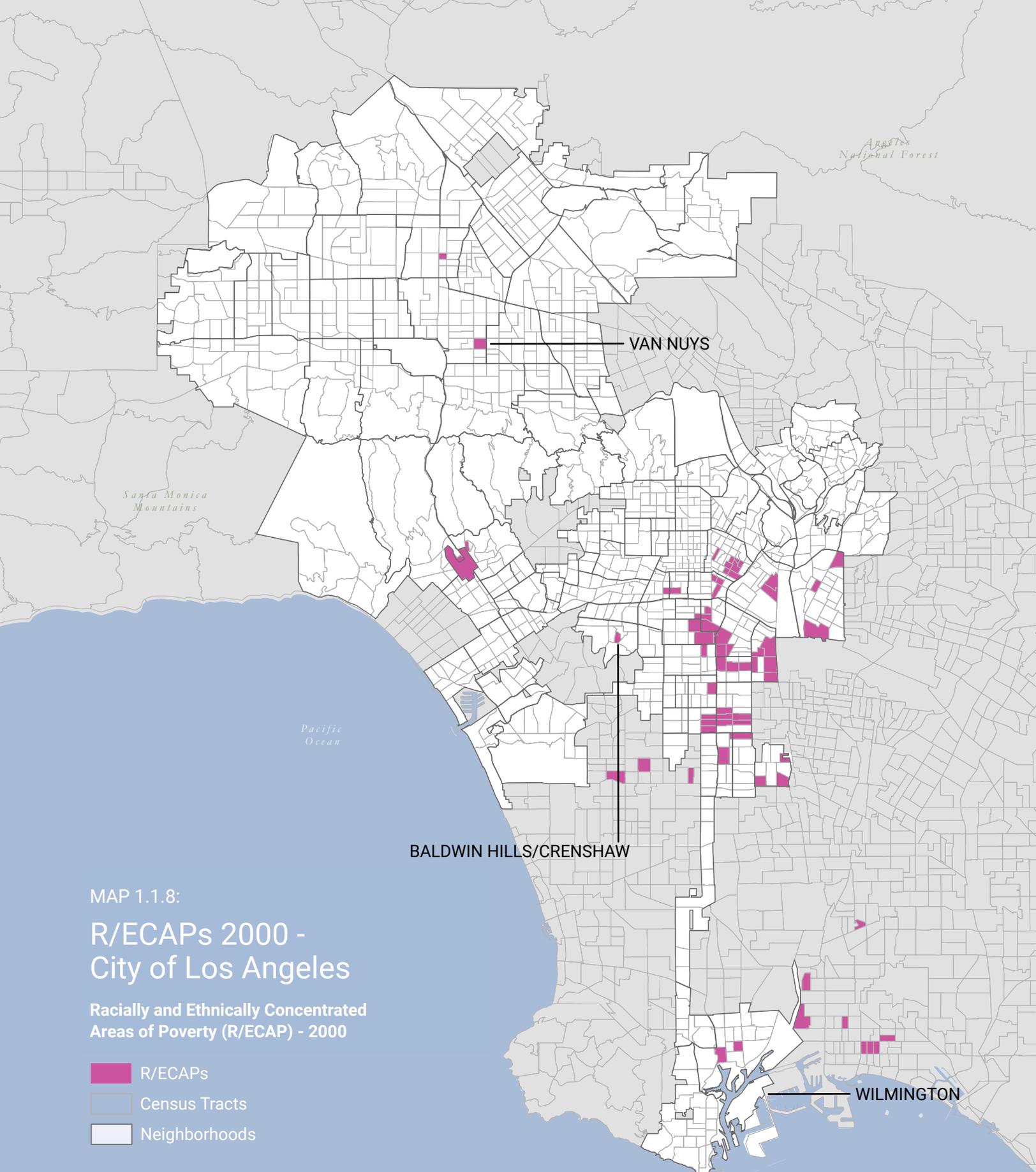
MAP 1.1.7:
**R/ECAPs 1990 -
 City of Los Angeles**

**Racially and Ethnically Concentrated
 Areas of Poverty (R/ECAP) - 1990**

- R/ECAPs
- Census Tracts
- Neighborhoods



Sources: US Department of Housing and Urban Development, US Census Bureau, Los Angeles Times

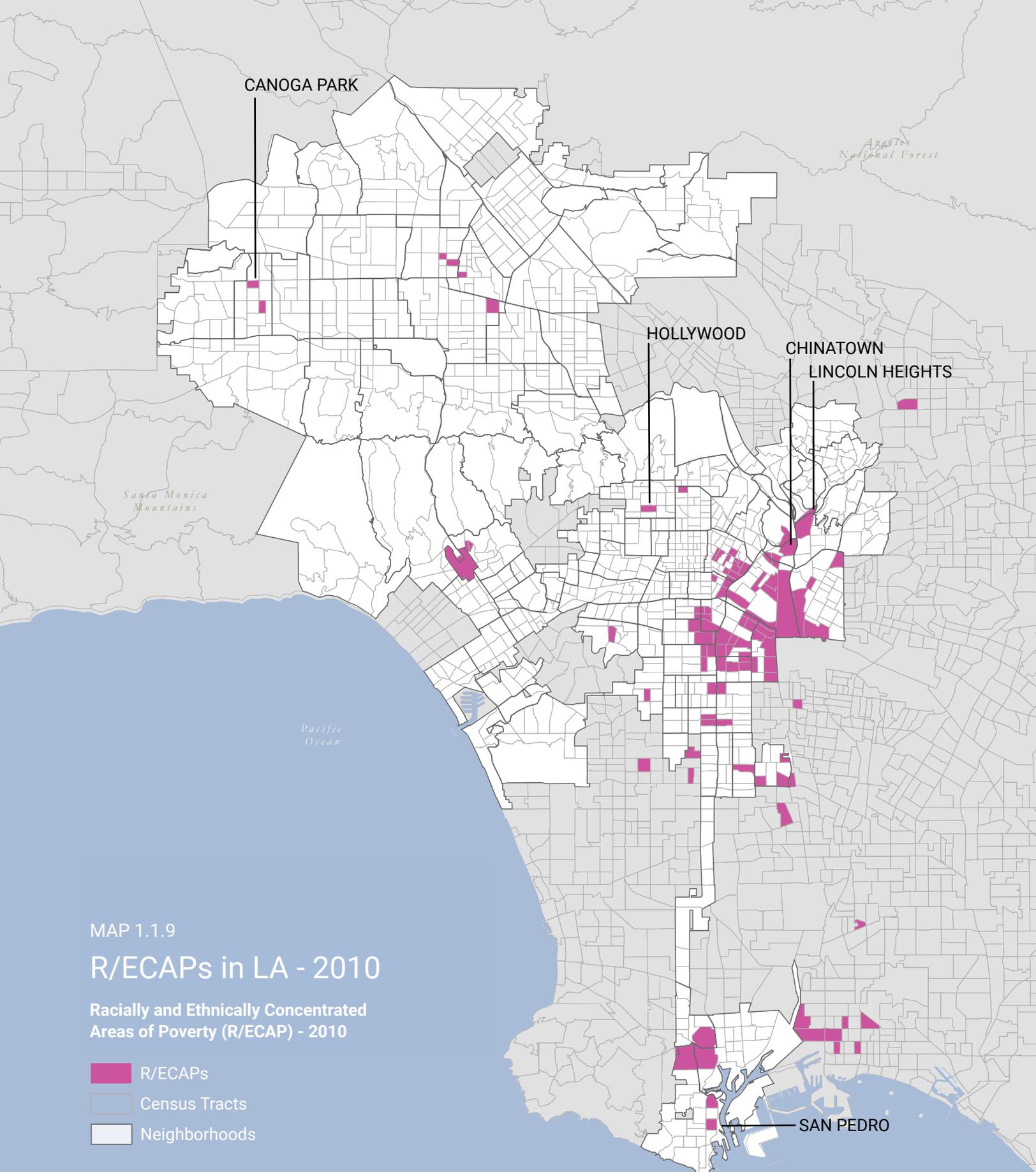


MAP 1.1.8:
**R/ECAPs 2000 -
 City of Los Angeles**

**Racially and Ethnically Concentrated
 Areas of Poverty (R/ECAP) - 2000**

- R/ECAPs
- Census Tracts
- Neighborhoods





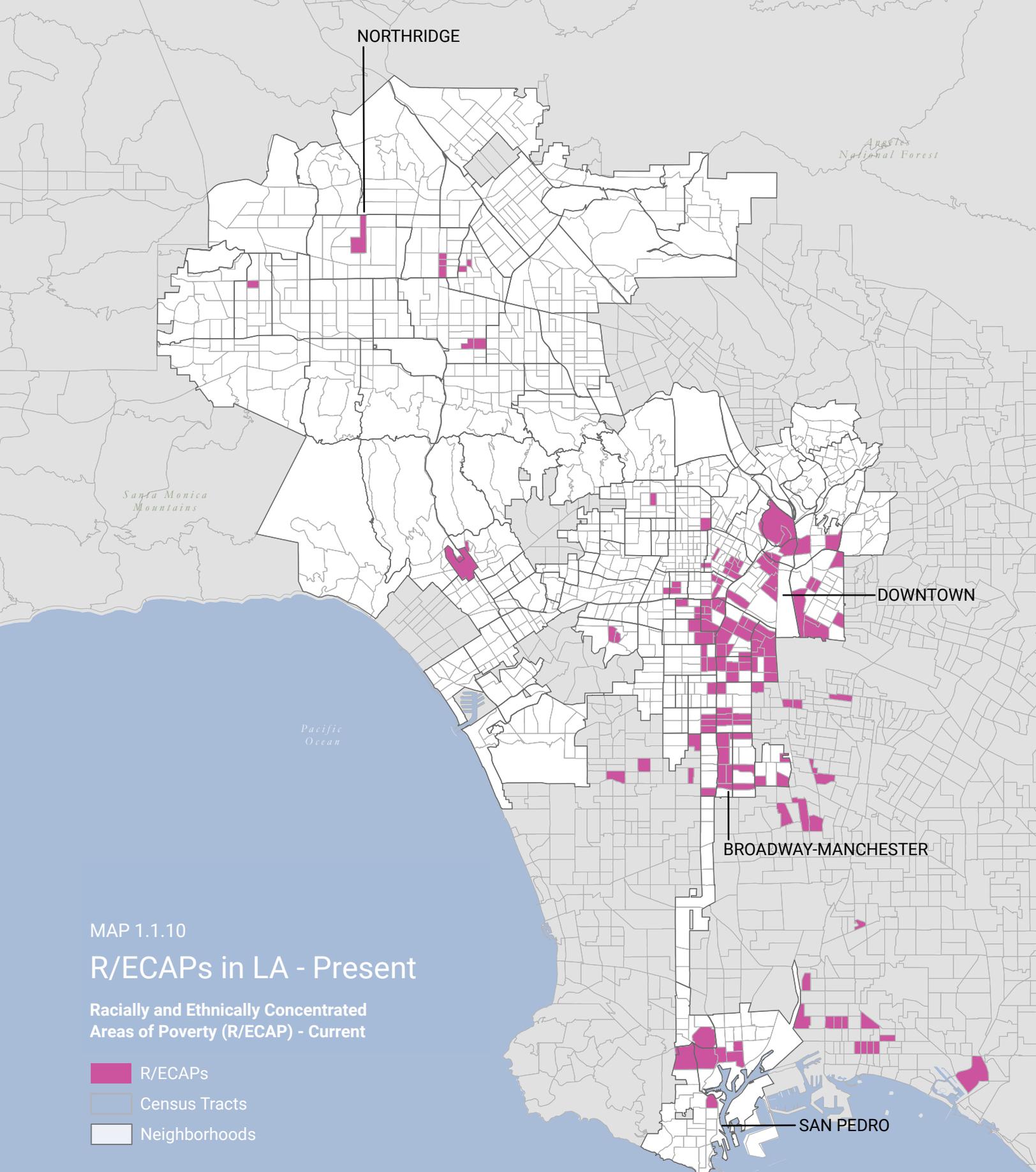
MAP 1.1.9

R/ECAPs in LA - 2010

Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) - 2010

- R/ECAPs
- Census Tracts
- Neighborhoods





MAP 1.1.10

R/ECAPs in LA - Present

Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) - Current

- R/ECAPs
- Census Tracts
- Neighborhoods



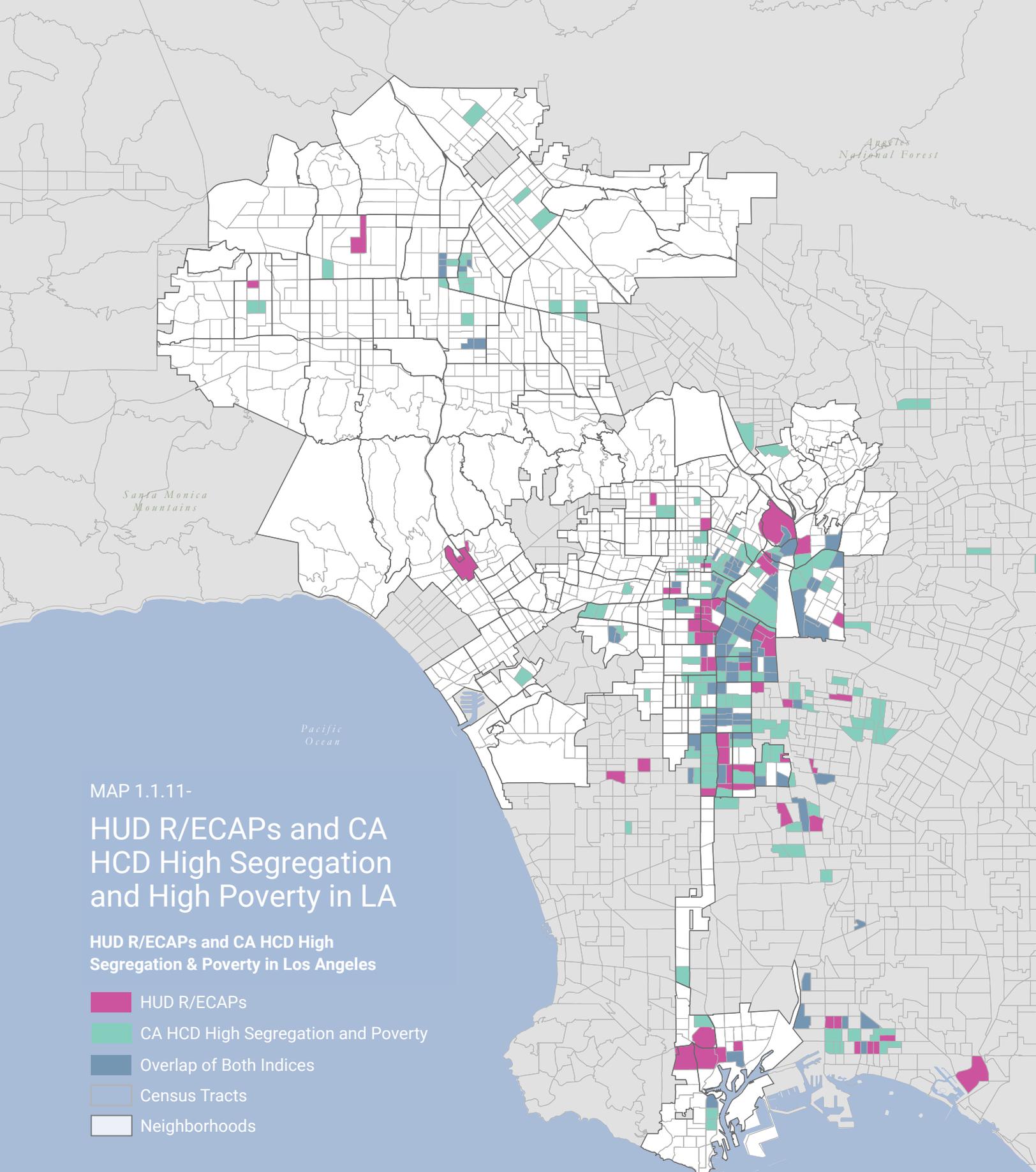
Sources: US Department of Housing and Urban Development, US Census Bureau, Los Angeles Times

Comparison of R/ECAPs and HCD's High Segregation and High Poverty Areas

As previously mentioned, HUD identifies R/ECAPs using a threshold for racial and ethnic concentration and poverty. Similarly, CA HCD designed an index that measures concentrations of segregation and poverty using an absolute threshold for poverty and a location quotient for race, by measuring the concentration of race in a census tract compared to county-level rates, along with ten other indicators in covering economic, educational and environmental domain scores.¹³

As shown in Map 1.1.11, there is substantial overlap between the two indices, however, there are more areas considered High Segregation and High Poverty than R/ECAPs, 243 compared to 146, respectively. Most of the additional areas considered High Segregation and High Poverty are located adjacent to R/ECAPs which shows that racially concentrated poverty continues to disproportionately impact Black and Latinx communities particularly in South Los Angeles neighborhoods such as South Central, Central-Alameda, South Park, Florence, Broadway-Manchester, East Los Angeles neighborhoods such as Boyle Heights, and Lincoln Heights, Central Los Angeles neighborhoods such as Chinatown, Downtown, and Westlake, Wilmington, San Pedro, as well as parts of San Fernando Valley including Van Nuys, Panorama City, and North Hills. One area that was previously considered a R/ECAP and is no longer considered a High Segregation and High Poverty area is the area surrounding the University of Southern California (USC) campus. This area has witnessed substantial displacement pressure since the R/ECAP methodology was created in 2017 due to gentrification and the expansion of student housing.

13. The methodology for the 2020 TCAC/HCD Opportunity Maps can be found here: <https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf>



MAP 1.1.11-
 HUD R/ECAPs and CA
 HCD High Segregation
 and High Poverty in LA

HUD R/ECAPs and CA HCD High Segregation & Poverty in Los Angeles

- HUD R/ECAPs
- CA HCD High Segregation and Poverty
- Overlap of Both Indices
- Census Tracts
- Neighborhoods



Sources: US Department of Housing and Urban Development, US Census Bureau, Los Angeles Times

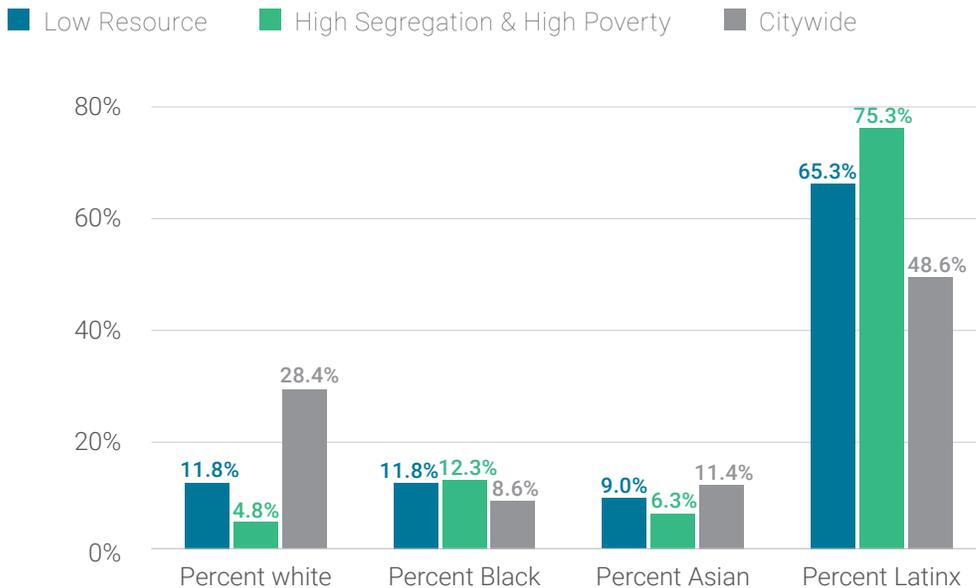
Demographics of High Segregation & High Poverty Areas

Low resource and High Segregation & High Poverty areas are disproportionately Latinx and Black. Black residents make up 9% of the city overall, but constitute 12% of the population in Low Resource and High Segregation & Poverty areas. Most strikingly, Latinx residents make up 49% of the city overall but 65% of the population of Low Resource areas and 75% of the population of High Segregation and High Poverty areas.

The prevalence of concentrated poverty and disparate access to opportunity is even more apparent when looking at the percent of each racial group that lives in High Segregation and High Poverty or Low Resource areas. Whereas only 3% of white residents live in High Segregation and High Poverty areas, 24% of Black residents and 26% of Latinx residents do.

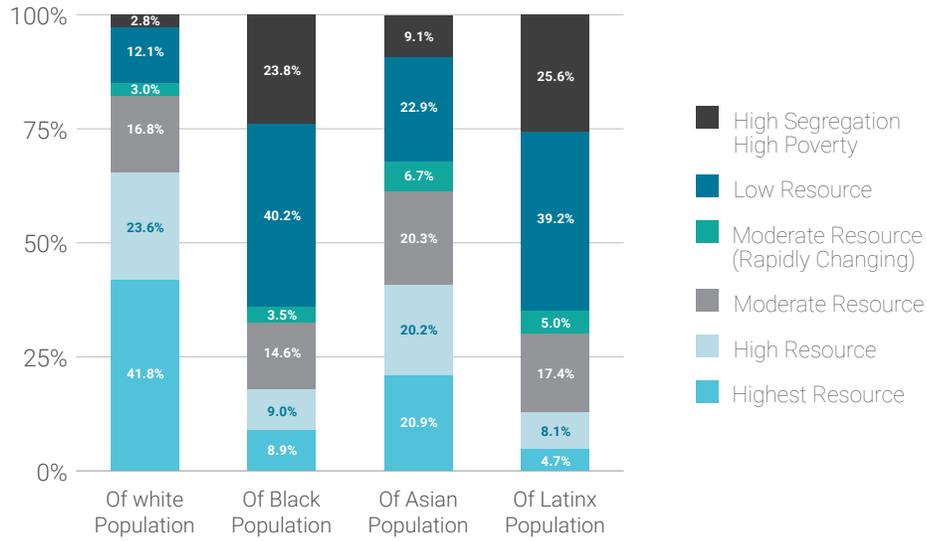
BIPOC residents have less access to opportunity in the city than in the surrounding metro area. In the city, 18% of Black residents, 41% of Asian residents, and 13% of Latinx residents live in High or Highest Resource areas, whereas in the metro area, 25% of Black residents, 51% of Asian residents, and 20% of Latinx residents do. Similarly, whereas nearly a quarter of Black and Latinx residents in the city live in High Segregation and High Poverty areas, within the metro area, only 15% of Black residents and 13% of Latinx residents live in these areas.

Chart 1.1.22: **Demographics of HCD/TCAC Opportunity Areas**



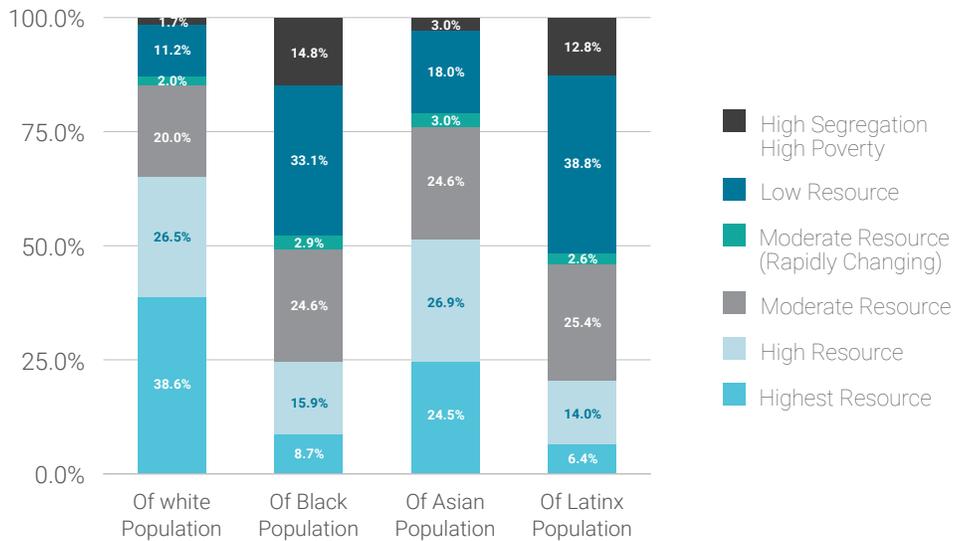
Source: 2020 Data HCD Data Portal

Chart 1.1.23: Percent of Each Racial Group by Opportunity Area in LA



Source: 2020 HCD Data Portal

Chart 1.1.24: Demographics of Area of Opportunity – LA Metro Area



Source: 2020 HCD Data Portal

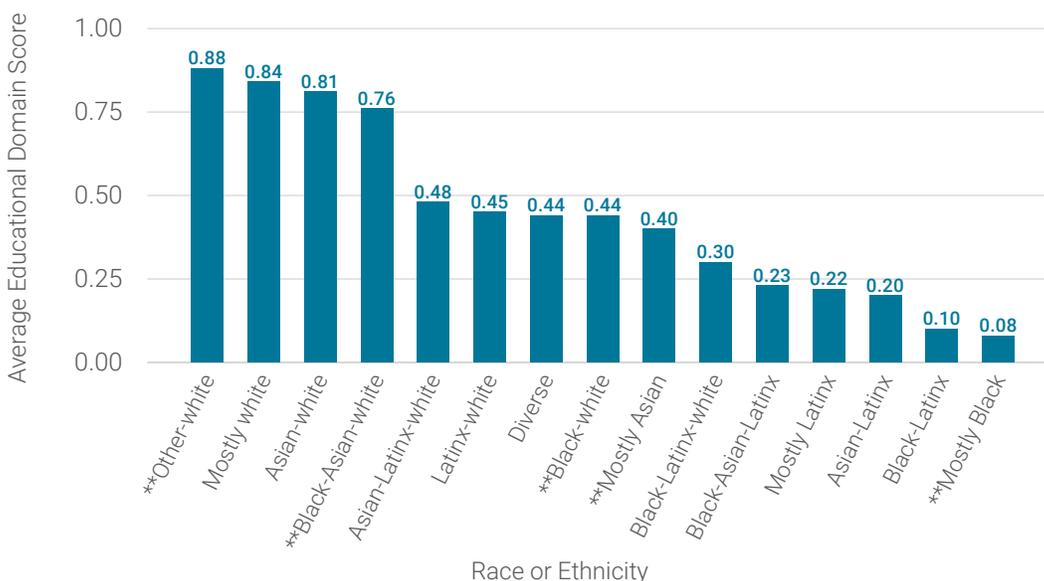
Racial Disparities in Access to Education

To assess disparities in access to education, the City of Los Angeles used the Educational Domain Index created by HCD and TCAC. The Index is based on the percentage of 4th graders who meet or exceed math and literacy standards, the percentage of high school students that graduate on time, and the percent of students not receiving free or reduced lunch. A higher Educational Domain Score indicates that the neighborhood has greater access to high performing schools and economic mobility.

As shown in Chart 1.1.25, Mostly white and white-Asian neighborhoods have an Educational Domain Score that is nearly four times higher than Mostly Latinx and Asian-Latinx and eight times higher than Black-Latinx neighborhoods. As mentioned, mostly white and white-Asian neighborhoods are located primarily in affluent areas of West and Central LA including Pacific Palisades, Brentwood, Bel Air, Beverly Crest, Pico-Robertson, and Fairfax and Hancock Park. Majority Latinx neighborhoods are located in the lower-income areas of the Northeast San Fernando Valley, Boyle Heights, and Southeast LA, and Black-Latinx neighborhoods are almost exclusively located in lower-income communities in South LA.

The Other-white neighborhood category, which includes a significant proportion of the population that identifies as white or Other, has the highest Index score. However, this neighborhood type is rare in Los Angeles and only found in three census tracts – one in Pacific Palisades, one near Fairfax, and one in the Hollywood Hills. Similarly the Black-Asian-white neighborhood category, which has the 4th highest score, only includes one census tract located in the Fairfax/Mid-Wilshire area. The two census tracts that are considered Mostly Black are located in Baldwin Hills/Crenshaw and Leimert Park, and have the lowest average Educational Domain Index scores.

Chart 1.1.25: **Average Educational Domain Score by Neighborhood Category**



Source: 2020 HCD Data Portal **There are less than five census tracts in the City that fall into this category

The 2018–2023 AFH, which contains a more thorough analysis of educational opportunity by race, found similar disparities. Based on 2017 data, the study found that Asian and white students in the Los Angeles Unified School District score significantly higher on standardized tests than socioeconomically disadvantaged, Black, Latinx, and Native American students and neighborhoods with a higher proportion of BIPOC residents had lower performing schools, as defined using HUD’s School Proficiency Index, than neighborhoods with more white students like West Los Angeles and the San Fernando Valley.

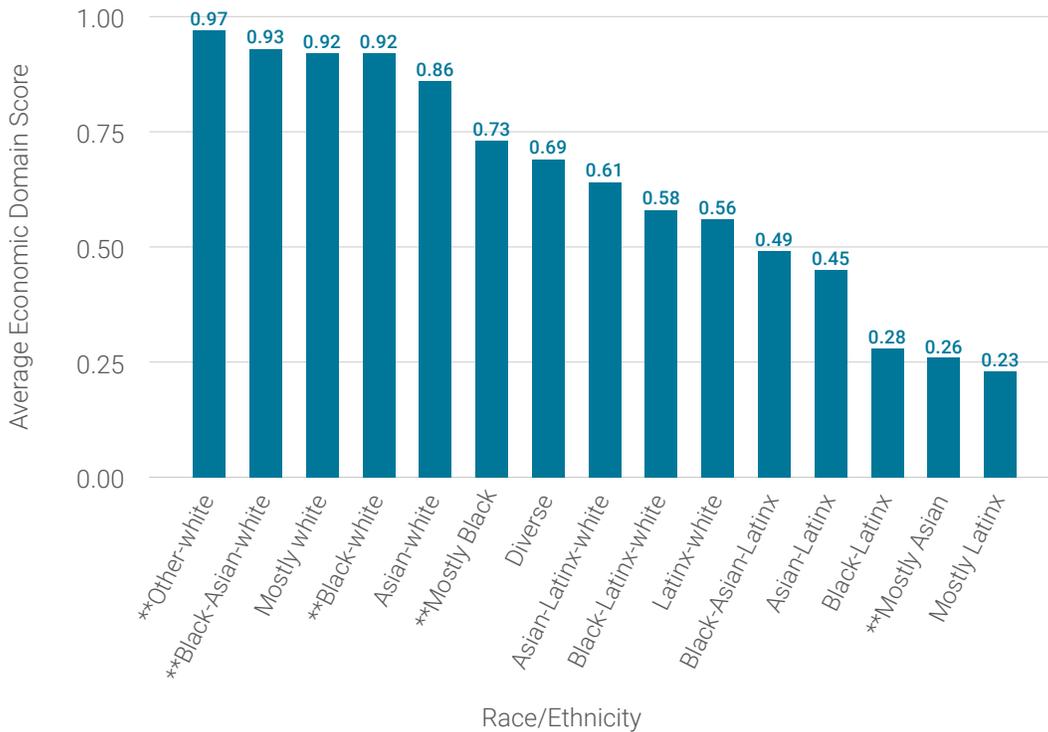
In addition to standardized test score performances, the AFH also analyzed discipline practices and graduation rates among students of different racial groups and found that Black students had higher rates of suspension than students of other racial groups and Black and Latinx students had the lowest rates of graduation.

Racial Disparities in Access to Employment and Economic Opportunity

The Economic Domain Index developed by HCD and TCAC includes the percent of the population with income above 200% of the poverty line, the percent of adults with a Bachelor’s degree or above, the percent of adults aged 20–64 who are employed in the labor force, the number of jobs filled by workers with less than a Bachelor’s Degree, and the median home value of owner-occupied units. As shown in Chart 1.1.26, of the neighborhood categories with more than five census tracts represented, mostly white neighborhoods had by far the highest Economic Domain score, with an average score over three times higher than Black-Latinx and Mostly Latinx neighborhoods. The Mostly Latinx neighborhoods had the lowest score. Compounding the challenges of lower access to quality education, proximity to environmental hazards, and limited access to quality jobs are the higher percentage of recent immigrants and undocumented residents in Mostly Latinx neighborhoods. The Mostly-Black neighborhoods have a higher Economic Domain Score, however make up a very small portion of the city, limited to less than 5 census tracts.

The Other-white and Black-Asian-white neighborhood categories scored highest, but as mentioned previously these areas represent a very small fraction of the city and are located in Pacific Palisades, Fairfax, Fairfax/Mid-Wilshire and the Hollywood Hills. Similarly, Black-white neighborhoods scored 4th highest but there are only three census tracts that meet this definition: one in the Hollywood Hills, one near Leimert Park, and one near Venice.

Chart 1.1.26: **Average Economic Domain Score by Neighborhood Category**



Source: 2020 HCD Data Portal **There are less than five census tracts in the City that fall into this category

The racial disparities described above were also highlighted in the City’s 2018–2023 AFH. Using a HUD-created index of labor market participation and human capital called the Labor Market Index, the AFH found that Black and Latinx residents are far more likely to live in areas with higher unemployment and lower educational attainment. Areas with more white and Asian residents like parts of the San Fernando Valley and West LA, had significantly higher Labor Market Index scores.

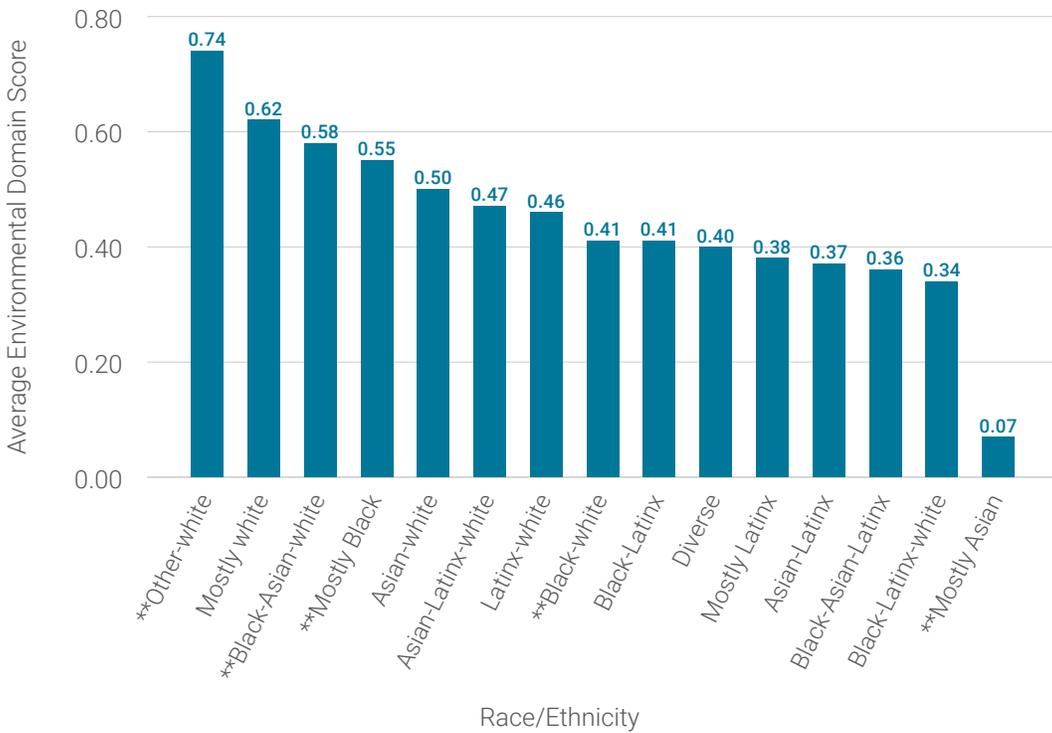
During the focus groups held in 2017–2018, stakeholders cited various systemic issues impacting employment access for protected classes including past involvement with the criminal justice system, employment discrimination, and lack of access to affordable childcare, transportation, internet, and stable housing.

Racial Disparities in Access to a Healthy Environment

HCD’s Environmental Domain Index includes the CalEnviroScreen 3.0 Pollution indicators such as air quality, drinking water quality, pesticide exposure, toxic release data, traffic levels, groundwater threats, hazardous waste, solid waste sites, and impaired water bodies.

All of the neighborhood types have relatively low Environmental Domain scores which is likely due to the prevalence of traffic, freeways, and poor air quality in Los Angeles. However, mostly white neighborhoods had by far the highest average score – 20% higher than any other category of neighborhood and nearly twice as high as Black-Asian-Latinx and Black-Latinx-white neighborhoods. As shown in the Maps 1.1.5 and 1.1.6, Black-Latinx-white and Black-Asian-Latinx are primarily located near major freeways, likely why they scored so much lower. The Mostly Asian neighborhood category had the lowest average score, however, the only area that meets this definition is Chinatown, which is close to several freeways and industrial areas.

Chart 1.1.27: **Average Environmental Domain Score by Neighborhood Category**



Source: 2020 HCD Data Portal **There are less than five census tracts in the City that fall into this category

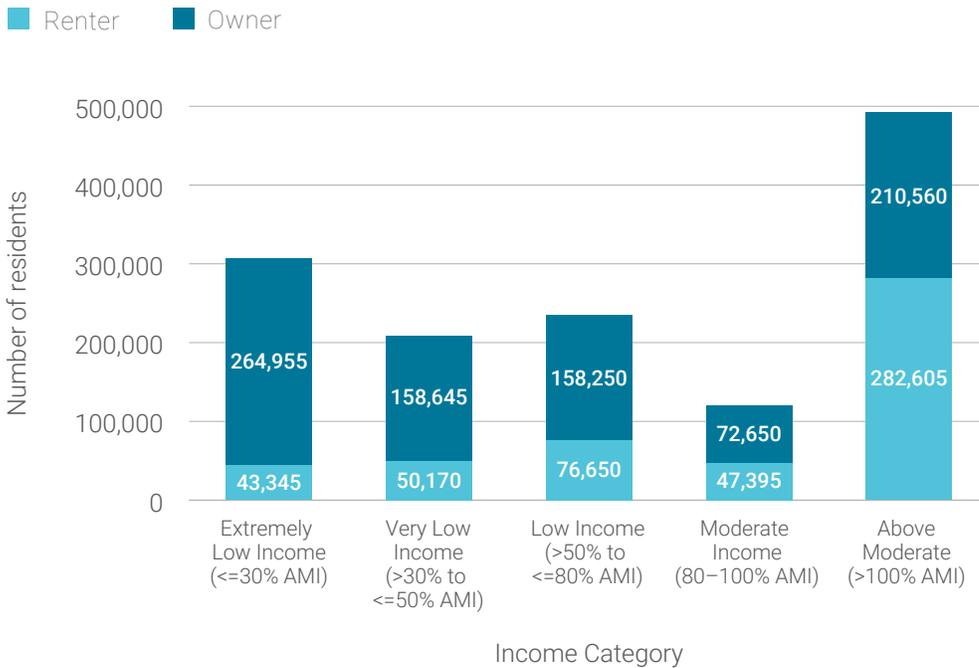
The City’s 2018–2023 AFH similarly found that Black and Latinx residents have less access to a healthy environment. The analysis particularly focused on the environmental impacts in South LA and highlighted the prevalence of polluting industries like auto body shops, gas stations, metal recycling plants, and garment factories in that area. The AFH also found that South LA had less access to healthy food, higher rates of businesses selling liquor, and higher rates of obesity, cardiovascular disease, and high cholesterol.

Fair Housing Analysis by Economic Status

Housing Needs by Economic Status

While Los Angeles is often perceived as a place for the rich and famous, the city is primarily home to lower-income people. According to the most recent data by the US Housing and Urban Development Department (HUD), over half (55%) of the households in LA City are considered lower income, with incomes below 80% of the area median income, and 23% in the city are considered Extremely Low-Income (ELI), or have incomes below 30% of area median income. The definition of each income category varies depending on household size and changes each year, however as of 2020, a family of four is considered Extremely Low-income if it earns less than \$35,450 per year, Very Low-income if it earns less \$59,100, and Low-income if it earns less than \$94,600. The lowest income people in the city are those who fall below the federal poverty line and are therefore eligible for federal subsidies like Medicaid, Food Stamps (SNAP), and the national school lunch program. Approximately 700,000 people live below the federal poverty line, including approximately 208,000 children. As of 2021, the federal poverty level for a family of four was \$26,500.

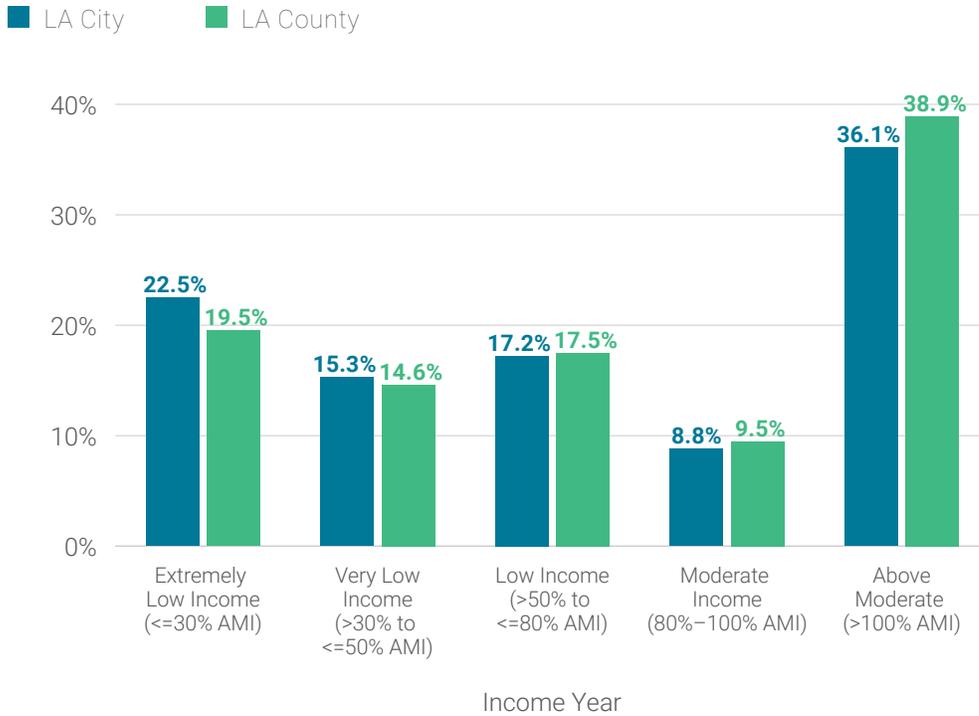
Chart 1.1.28: **Income Categories for Renters and Owners in LA City**



Source: ACS, 2013-2017

When compared to the rest of the county, the city has a higher percentage of Extremely Low Income people (23% compared to 19%) and a lower percentage of people above moderate income (36% compared to 39%). LA City also has a higher poverty rate compared to the county, with over 18% of people living in poverty compared to 13% for the county.

Chart 1.1.29: **Population by Income Category – LA City and County**

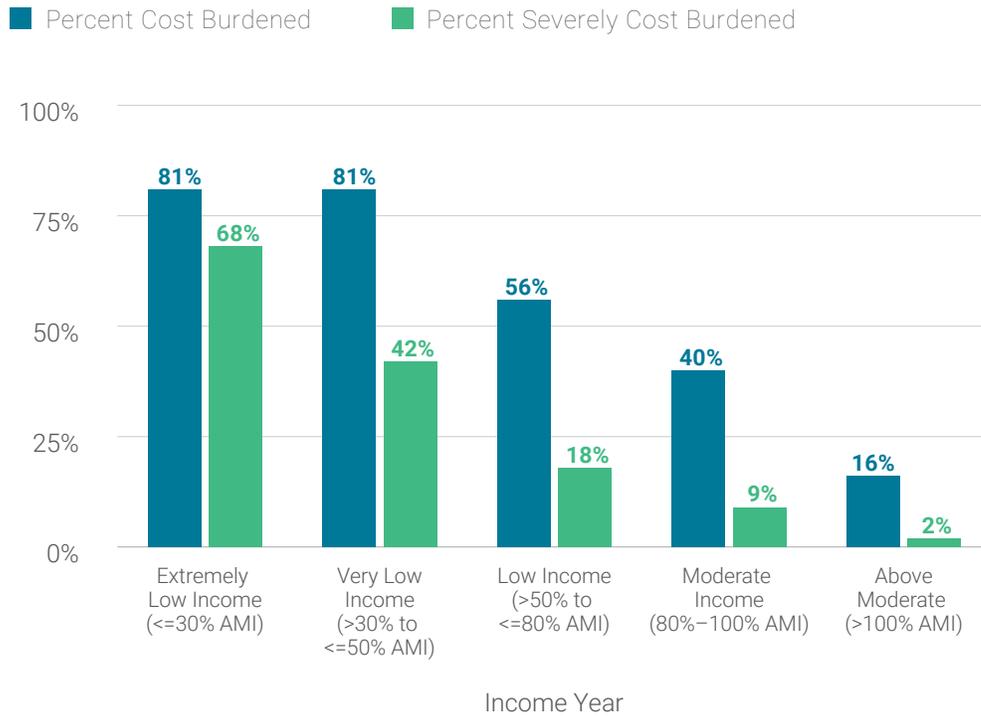


Source: HUD CHAS, 2013–2017

Housing affordability is by far one of the greatest issues facing lower income households and people in poverty. Extremely Low-Income households have the highest rate of cost burden. Over 81% of Extremely Low-Income households pay more than 30% of their income on rent and 68% pay more than 50% of their income on rent.¹⁴

14. HUD CHAS Data, 2013-2017.

Chart 1.1.30: **Percent Cost Burdened and Percent Severely Cost Burdened**



Source: HUD CHAS data, 2013–2017

Economic Segregation and Integration

Los Angeles is characterized as having some of the most acute income inequality in the country. As discussed in detail in this section, patterns of economic segregation remain highly entrenched. Research shows that income segregation in the Los Angeles region has grown every decade from 1980 to 2012, as evidenced by the decrease in middle-income households and neighborhoods. The collapse of the aerospace industry in the 1990s and the exodus of many middle-income jobs has resulted in more neighborhood-level income disparities and a greater proportion of people living either in high poverty neighborhoods or very affluent neighborhoods.¹⁵ This trend is not only local but reflective of broader income and wealth inequalities nationwide. According to a study from the Pew Research group, the wealth gap between America’s richest and poorer families more than doubled from 1989 to 2016W.¹⁶ The economic impact of the COVID-

15. Paul Ong et al., “Race, Ethnicity, and Income Segregation in Los Angeles” (UCLA Center for Neighborhood Knowledge, June 2016), https://knowledge.luskin.ucla.edu/wp-content/uploads/2018/01/Race-Ethnicity-and-Income-Segregation-Ziman_2016.pdf

16. Katherine Schaeffer, “6 Facts about Economic Inequality in the U.S.” (Pew Research Center, May 27, 2021), <https://www.pewresearch.org/fact-tank/2020/02/07/6-facts-about-economic-inequality-in-the-u-s/>

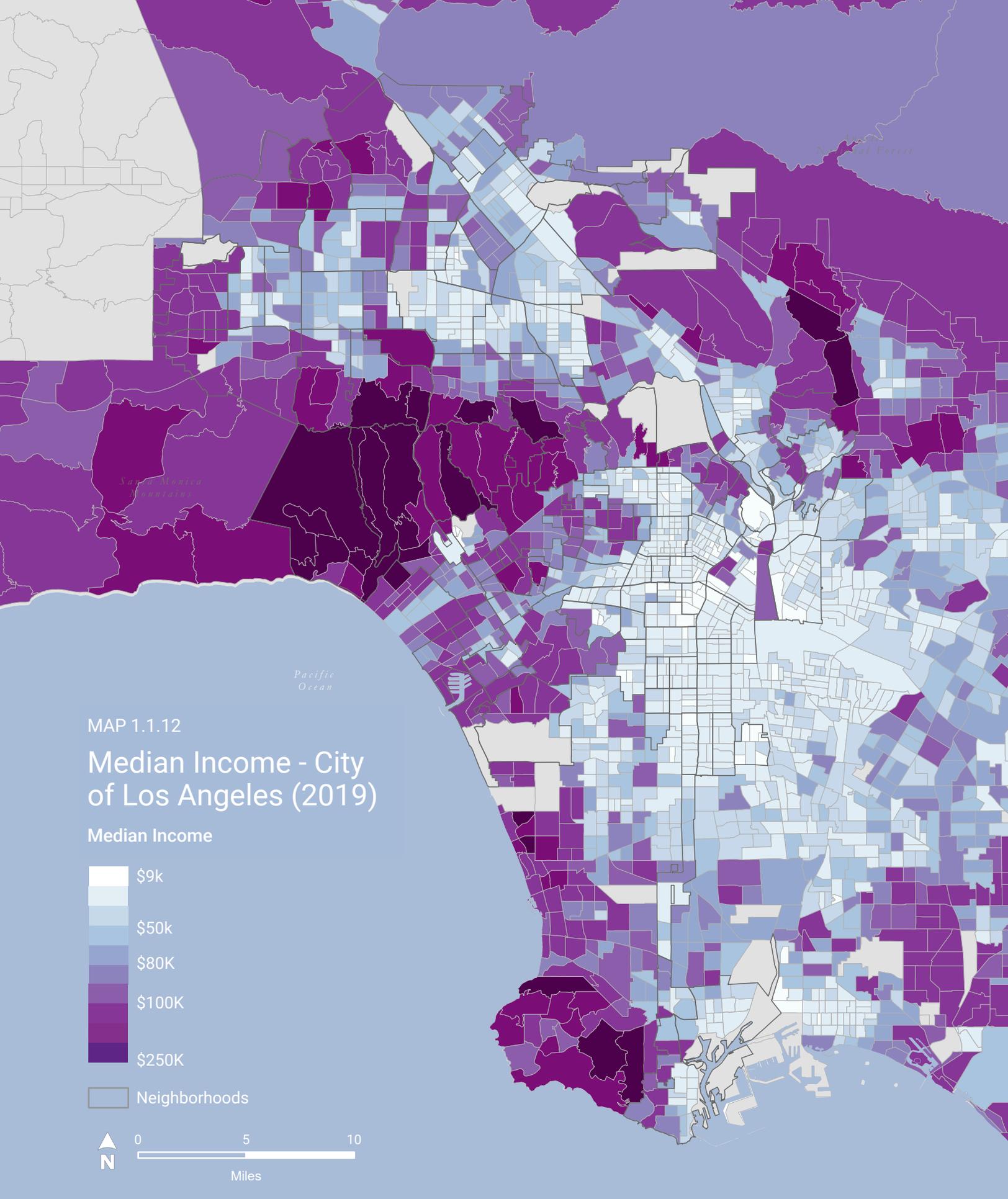
19 pandemic and the subsequent uneven economic recovery threatens to further exacerbate these trends.

Overall Economic Segregation Patterns

Income inequality in Los Angeles is dramatic and highly spatialized. For example, within Downtown Los Angeles, the census tract that includes the Skid Row neighborhood has a median household income of \$9,119 and is adjacent to census tracts with median incomes exceeding \$100,000 (median household income in the city is \$62,142). Other neighborhoods with median household incomes greater than \$100,000 are located in the San Fernando Valley, which include the neighborhoods of Granada Hills, Porter Ranch, Chatsworth, Shadow Hills, West Hills, Woodland Hills, and Tarzana, West LA which include the neighborhoods of Beverly Crest, Beverly Grove, Fairfax, Westwood, Cheviot Hills, and Beverlywood, Venice, Mar Vista, and Del Rey, and Northeast LA which include the neighborhoods of Los Feliz, Silverlake, Echo Park, Glassell Park, Eagle Rock, Mount Washington. Pacific Palisades and Brentwood, as well as parts of Bel Air, Sherman Oaks, Encino, and Studio City all have median incomes upwards of \$200,000 as the wealthiest areas in the City of Los Angeles.

Aside from the relatively few areas of extreme concentrated wealth in West LA and the Southern and San Fernando Valley, most neighborhoods in the city are majority Low- or Moderate Income (LMI) (as shown in Map 1.1.13). The greatest concentrations of both LMI households and people in poverty are located in South Los Angeles (particularly Southeast Los Angeles), Boyle Heights, Westlake/Pico Union, Chinatown, and parts of the San Fernando Valley including Pacoima, Panorama City, and Van Nuys.¹⁷

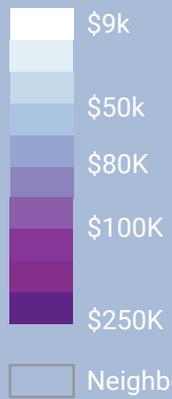
17. Note: The areas that include the UCLA and USC campuses appear to have some of the highest concentrations of poverty in the City. This data is skewed due to the fact that most of the full-time students attending the universities earn little to no income).

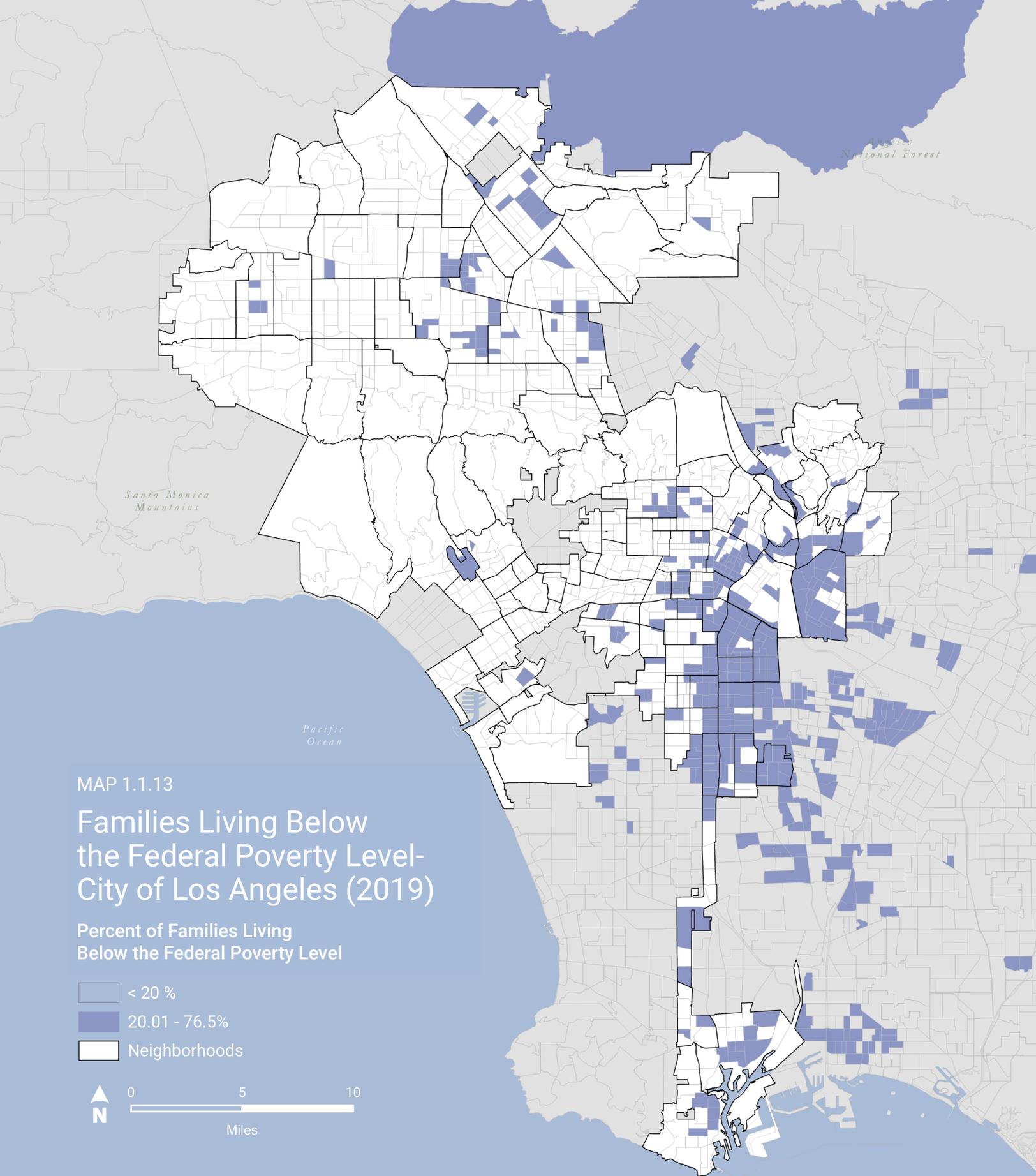


MAP 1.1.12

Median Income - City of Los Angeles (2019)

Median Income





MAP 1.1.13

Families Living Below the Federal Poverty Level - City of Los Angeles (2019)

Percent of Families Living Below the Federal Poverty Level

- < 20 %
- 20.01 - 76.5%
- Neighborhoods



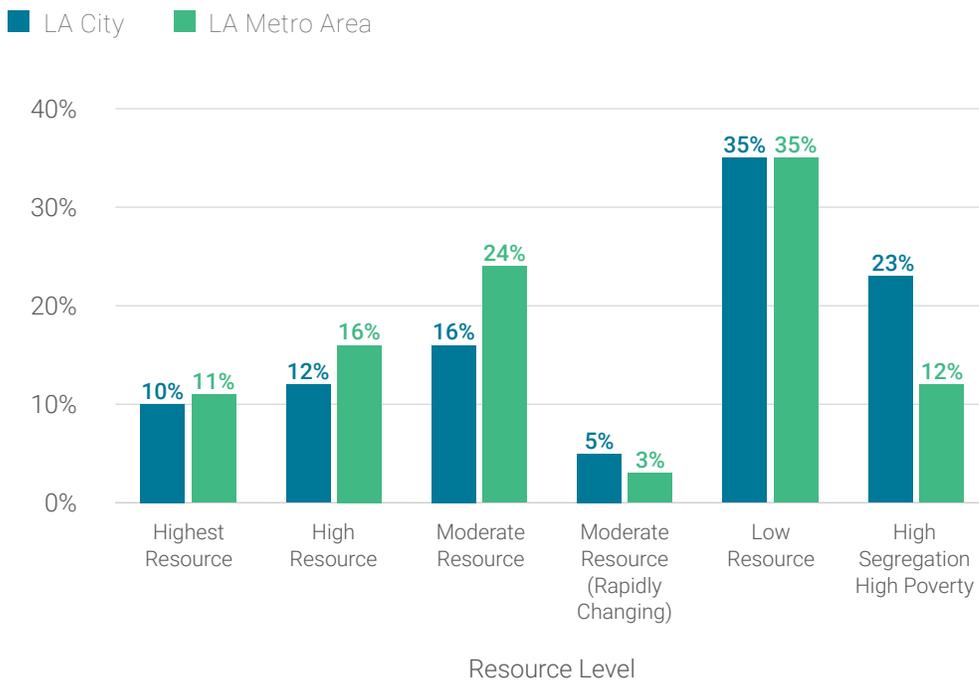
Quantifying Economic Segregation

The dissimilarity index (described on pages 26 & 28) can also be used to measure the extent of economic integration within neighborhoods. Using the census block group level data provided by HCD, we calculated the dissimilarity level between Low/Moderate Income households and above moderate income households. Based on the calculations, the city has a dissimilarity score for Low/Moderate income households of 42.3 and the metro area has a slightly lower score of 41.7. This indicates moderate levels of segregation at both the city and metro level. It is important to note that the economic dissimilarity levels are far lower than the racial dissimilarity levels, which suggests that racial segregation patterns cannot be entirely attributed to economic disparities.

Access to Opportunity by Economic Status

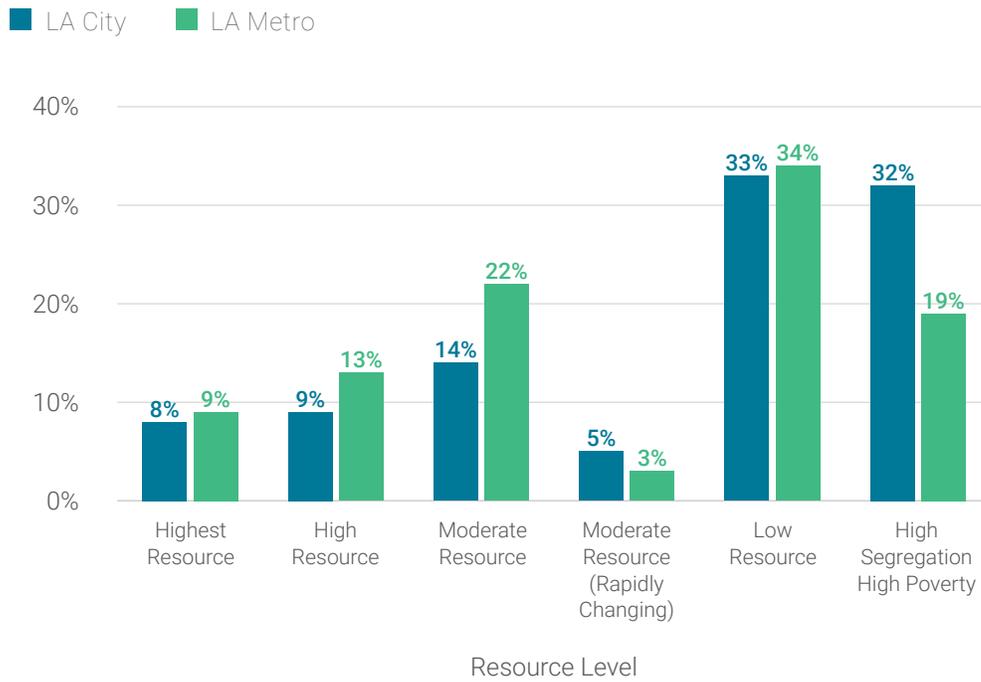
Lower and moderate income households and people in poverty are far more likely to live in Low Resource and High Segregation and High Poverty areas. Over half (58%) of Low and Moderate income households in the city live in Low Resource or High Segregation and High Poverty areas and nearly two thirds (65%) of people in poverty live in these areas. When a focus is made on children in poverty, the percentage increases even further to over three-fourths (76%) of the population. At the metro level, similar disparities exist, however, low and moderate income residents and residents in poverty have slightly greater access to higher opportunity areas and significantly more access to moderate income areas than they do in the city.

Chart 1.1.31: **Percentage of Low and Moderate Income by Resource Area**



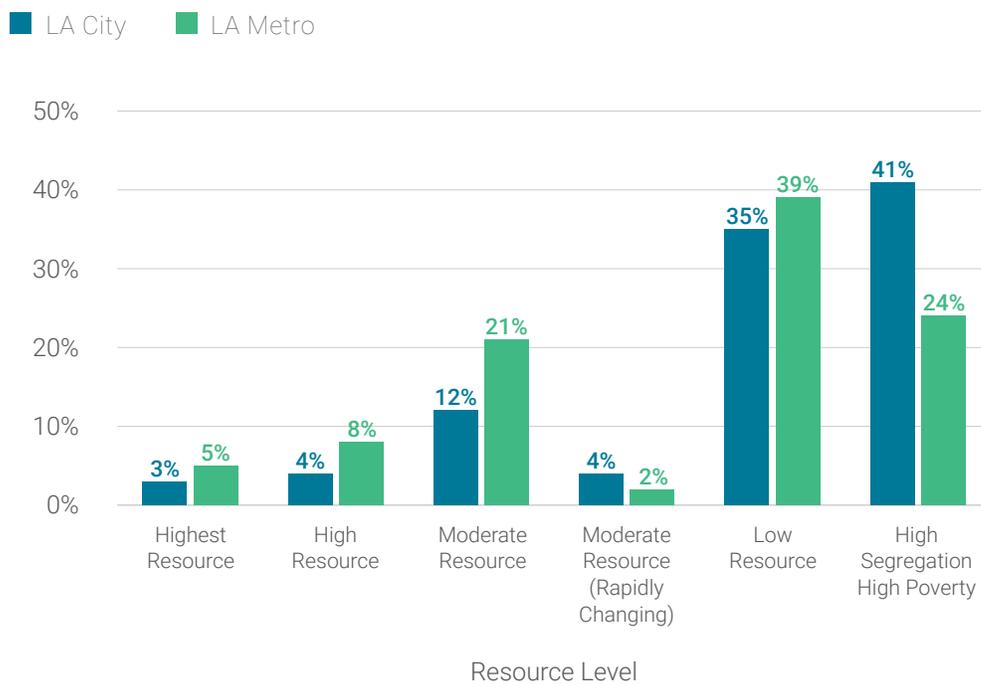
Source: 2019 5-Year Summary Data

Chart 1.1.32: **People in Poverty by Neighborhood Resource Category**



Source: 2019 American Community Survey, 5-Year Summary Data

Chart 1.1.33: **Children in Poverty by Neighborhood Resource Category**



Source: 2019 American Community Survey, 5-Year Summary

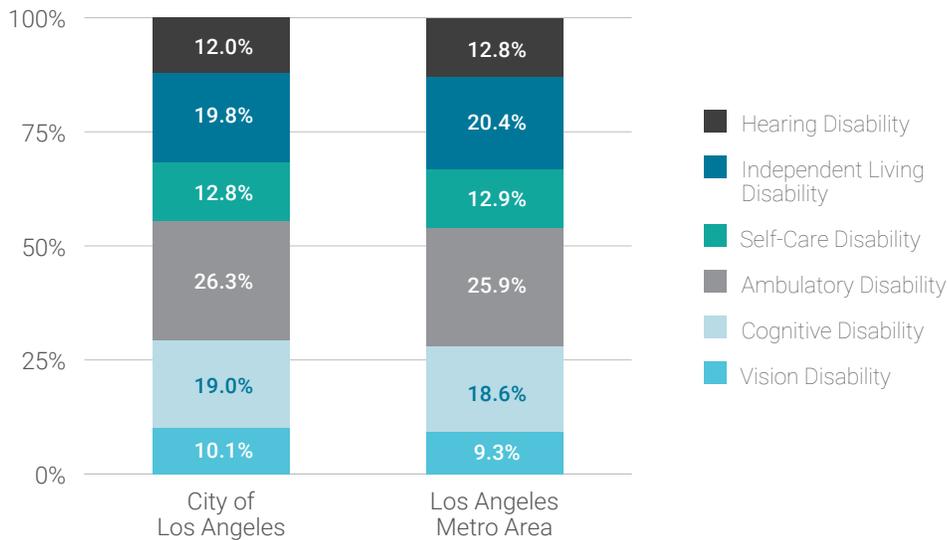
Fair Housing Analysis for People with Disabilities

Housing Needs for People with Disabilities

The American Community Survey (ACS) collects data on six types of disabilities: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty. As mentioned, approximately 10%, or nearly 400,000 residents, have a disability as defined by the Census and live in a non-institutional setting in the City of Los Angeles. According to the California Department of Developmental Services, there are approximately 114,000 in LA County residents served by the Regional Centers for the Developmentally Disabled. The estimated 46,000 of those residents who live in the city may or may not be captured by the Census data.

As seen in Chart 1.1.34, the proportion of people with each of the six disabilities types in the city is nearly the same as the metro area.

Chart 1.1.34: **Percent of Persons with Disabilities By Disability Type**



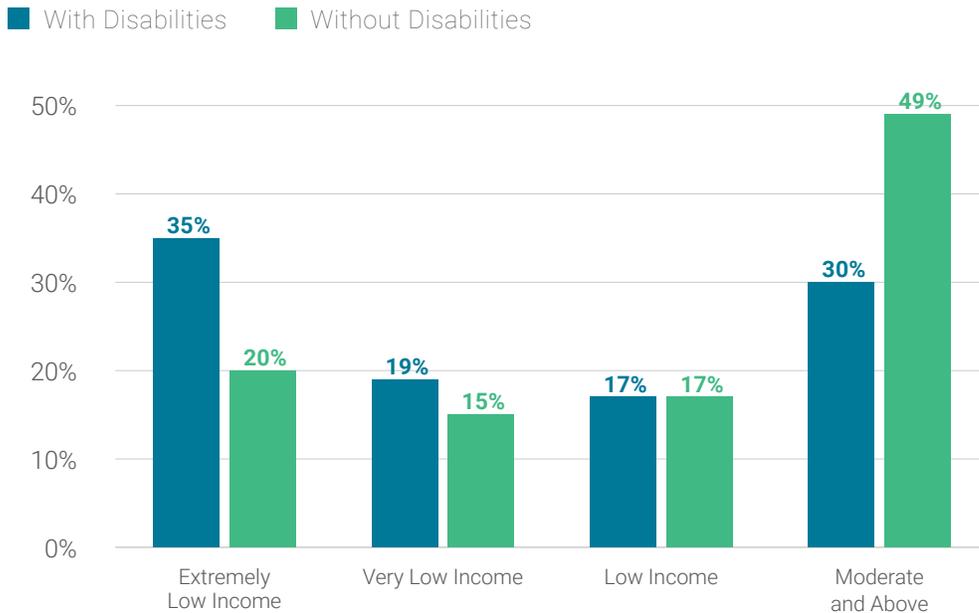
Source: 2019 American Community Survey (ACS) Data

Households with one or more people with disabilities often face significant financial difficulties that limit their ability to find suitable housing. Approximately 74% of people with disabilities who are not institutionalized and of working age (18 to 64) are not in the workforce and those who are working have median earnings that are 27% lower than

individuals without disabilities.¹⁸ The trends are similar for people with developmental disabilities. According to the California Department of Developmental Services, 84% of people with developmental disabilities in the state do not receive earned income and those who do work have an annual income of just \$10,317.

Disparities for people with disabilities are further demonstrated when their income distribution levels are compared to non-disabled people. The largest income category for disabled residents in the city are extremely low income at 35% compared to 20% for non-disabled residents. And while nearly one-third of disabled residents have incomes at moderate or above-moderate levels, it is much lower than the city’s non-disabled population at nearly half.

Chart 1.1.35: Los Angeles Income Distribution for People with and without Disabilities



Source: 2019 ACS, 5-year summary data

For those unable to work, typical fixed monthly incomes do not adequately cover monthly housing costs and living expenses. For example, as of December 2020, the average Social Security Disability Insurance (SSDI) payment is \$1,277 per month for a worker with a disability and the maximum Supplemental Security Income (SSI) is

18. ACS 2019 5-year Summary Data

between \$955 and \$1,011 for single, independent people with disabilities.¹⁹ A household with at least one person with disabilities receiving the average SSDI and maximum SSI payment would only be able to afford a rent of \$686, far lower than the \$1,995 average rent for a 1-bedroom in the city.

As a result of lower labor market participation and lower incomes, people with disabilities have much higher rates of poverty (as shown in the chart below). As of 2019, approximately 101,000 people with disabilities live in poverty including nearly 7,000 children.²⁰ Parents of children with disabilities are often unable to find or afford adequate childcare and often have to leave the labor force to care for their children. As a result, poverty rates among young children with disabilities are particularly high. Over 40% of children under age five live in poverty, which is nearly twice the rate of children under age five without a disability.

Table 1.1.5: Percent of the Population Below the Poverty Line by Age

	With a Disability	Without a Disability
Under 5	40%	23%
5 to 17 years:	29%	25%
18 to 34 years:	23%	15%
35 to 64 years:	31%	12%
65 to 74 years:	23%	12%
75 years and over:	22%	14%

Source: ACS 2019 1-year Summary Data

People with disabilities are significantly overrepresented among the city’s unhoused residents. The city’s last Homeless Count conducted by LAHSA in 2020 found that approximately 19% of all unhoused adults in the city had a physical disability, 25% had a serious mental illness, and 11% had a developmental disability. The prevalence of homelessness amongst individuals with disabilities underscores the need for increased affordable and accessible options, including emergency shelters, adult residential facilities, residential care facilities, and permanent supportive housing.

19. Social Security Administration

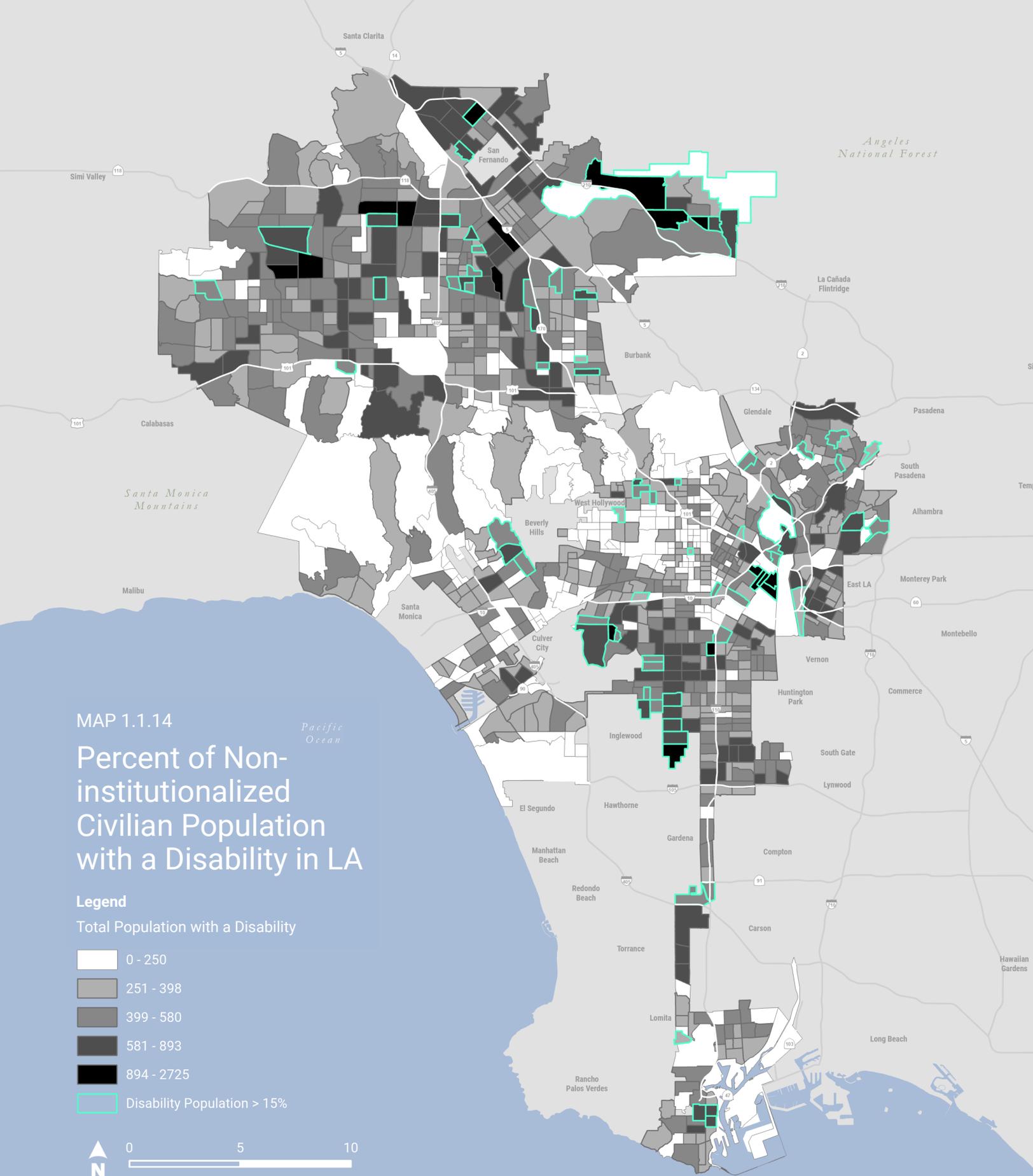
20. American Community Survey, 2019 1-year Summary Data

As described in Chapter 1, there is an overall shortage of affordable housing in the city but that shortage is even more dire for people with disabilities who may require specific physical modifications. For example, people with vision problems may need accessible signage, auditory alarms, and service animal accommodations, people with hearing disabilities may need visual alerts and accommodations to enable effective communication, and people with physical or ambulatory disabilities may require housing with accessible features (i.e., ramps, grab-bars, wider doorways). As part of the Fair Housing Act, newly constructed multi-family units with four or more units are also required to meet certain accessibility requirements and federally assisted developments must set aside 5% of units for persons with mobility disabilities and 2% of units for residents with hearing or visual disabilities. All housing providers are prohibited from discriminating against people with disabilities and must make reasonable accommodations to meet the needs of residents with disabilities. However, despite the legal protections, discrimination and unlawful denial of reasonable accommodation requests are unfortunately far too common. Between 2013–2019, the Housing Rights Center reported over 5,200 fair housing complaints, with close to 80% involving discrimination on the basis of a physical disability, 12% on family status, and 8% on the basis of race. Many additional cases each year likely go unreported.

Segregation Patterns for People with Disabilities

Overall Segregation Patterns for People with Disabilities

People with disabilities live in nearly all parts of the city fairly dispersed. However certain areas like Downtown, Southwest LA, Westwood, parts of the San Fernando Valley, and parts of Northeast Los Angeles do have both a greater overall number of people with disabilities and a greater share of the population with disabilities. As shown in Map 1.1.14, there are 76 census tracts in the city consisting of persons with disabilities which exceed 15% of the total tract population.



MAP 1.1.14
 Percent of Non-institutionalized Civilian Population with a Disability in LA

Legend

Total Population with a Disability

- 0 - 250
- 251 - 398
- 399 - 580
- 581 - 893
- 894 - 2725

Disability Population > 15%



Source: 2019 American Community Survey

The Skid Row neighborhood in Downtown Los Angeles has the highest concentration of people with disabilities in the city. Skid Row is a unique residential neighborhood that has long served people in need. The community includes family and social services, emergency shelters, permanent supportive housing, single room occupancy hotels, as well as a significant concentration of people experiencing homelessness. As of 2019, Skid Row houses approximately 5,700 people with disabilities in the southern portion of the neighborhood (between 5th St and 7th St, from Alameda St to Los Angeles St) and nearly 45% of the population has a disability as defined by the US Census Bureau. Many of the residents in Skid Row are unhoused and based on the 2020 Point in Time Count, 1,703 (38%) had a serious mental illness, 1,169 (26%) had a physical disability, 1,573 (35%) suffered from a substance abuse, 780 had a developmental disability (18%), and 165 (4%) had HIV/AIDS. In addition, 59% of unhoused residents in Skid Row are also Black. Data confirms people of color with disabilities experience the deepest level of poverty and are the farthest from obtaining accessible and safe housing.

Table 1.1.6: Disability Status for Homeless Residents in Skid Row

Health/Disability Indicator	Sheltered	Unsheltered	Total	Percent of the Adult Homeless Population
History of Substance Abuse	482	1,091	1,573	35%
HIV/AIDS	112	53	165	4%
Serious Mental Illness	798	905	1,703	38%
Developmental Disability	493	287	780	18%
Physical Disability	569	600	1,169	26%

Source: 2020 Greater Los Angeles Homeless Count

Additional Data for People with Developmental Disabilities

As discussed in Chapter 1, people with developmental disabilities are served by a system of Regional Centers, seven of which serve Los Angeles County and six of which serve city residents as shown in Table Table 1.1.7 below. The North Los Angeles County Regional Center, the East Los Angeles Regional Center, and the South Central Los

Angeles Regional Center serve the greatest number of individuals with developmental disabilities, indicating that there may be more people with developmental disabilities living in these areas of the county.

Table 1.1.7: Services for Residents with Developmental Disabilities by Regional Center

Regional Center	Area Served	Total Served	Percent of those Served in the County
Frank D. Lanterman Regional Center	Central portion of the City of Los Angeles and some communities in the South San Fernando Valley.	10,620	9%
Harbor Regional Center	Harbor and San Pedro areas	15,000	13%
North Los Angeles County Regional Center*	The northern portion of the San Fernando Valley	26,800	24%
South Central Los Angeles Regional Center*	South LA	17,460	15%
Westside Regional Center*	West LA	9,130	8%
East Los Angeles Regional Center	East LA and East LA County	21,590	19%
San Gabriel/Pomona Regional Center	San Gabriel Valley	13,400	12%

Source: data from the 2020 Regional Performance Contract Reports filed with the Department of Developmental Services for the seven Regional Centers located in LA County

The fairly dispersed distribution of people with disabilities and developmental disabilities in the city is reflective of various federal and state policy reforms and court decisions that require people with disabilities to be meaningfully integrated into the broader community. Prior to the 1960s and 1970s, people with intellectual, developmental, and psychiatric disabilities were housed in large state-run institutions. Within these institutions, people with disabilities had few opportunities for meaningful

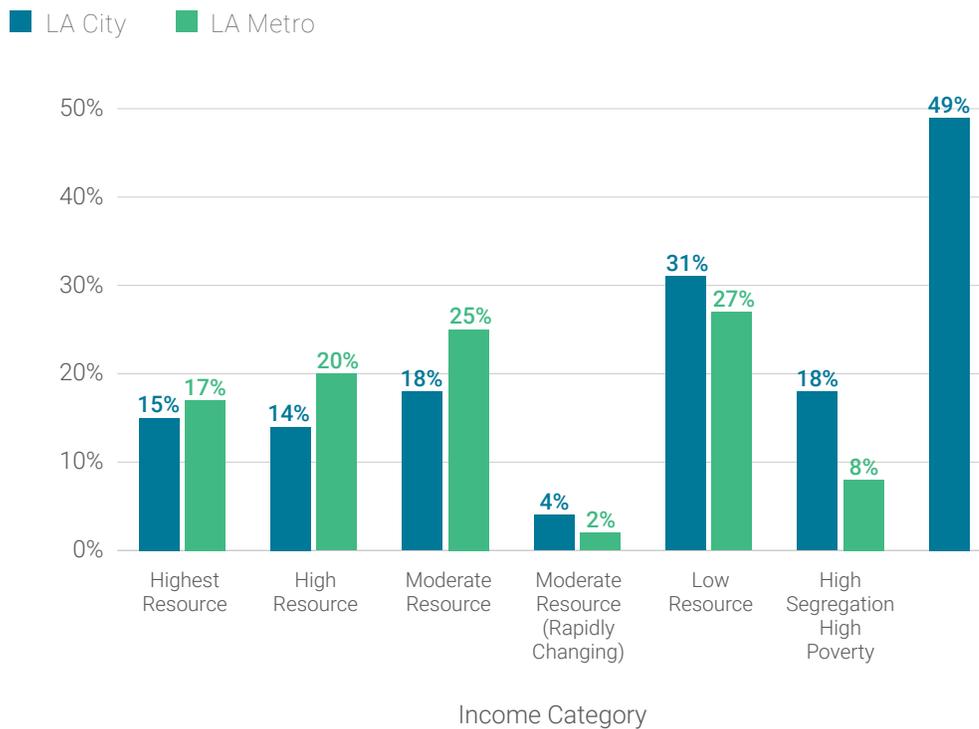
interaction with individuals without disabilities, limited access to education and employment, and a lack of individual autonomy. The transition away from institutional settings towards providing housing and services in home and community-based settings accelerated with the passage of the Americans with Disabilities Act in 1991 and the U.S. Supreme Court's landmark decision in *Olmstead v. L.C.* in 1999. The Supreme Court held that, under the regulations of the U.S. Department of Justice (DOJ) implementing Title II of the Americans with Disabilities Act (ADA), if a state or local government provides supportive services to people with disabilities, it must do so in the most integrated setting appropriate to the needs of a person with a disability and consistent with their informed choice. Legislation from 2010 also prohibits developments that receive Section 811 Project Rental Assistance funds from setting aside no less than 25% of units for households at or below 50% AMI with at least one person with disabilities.

Although the city and the State have made great strides in reducing the number of persons with disabilities who reside in segregated settings, the shift away from large institutional settings like developmental centers and state hospitals has not resulted in full community integration in all cases, as evidenced by the population concentration in Skid Row. Persons with disabilities who are at the greatest risk of institutionalization, including persons with psychiatric disabilities and persons with intellectual and developmental disabilities, are more frequently subject to homelessness or take residence in segregated congregate settings like nursing homes, intermediate care facilities, board and care homes, and large group homes. While congregate settings provide a combination of housing, much needed personalized supportive services and medical care, these living accommodations are still isolated from a community setting that offers opportunities to participate in civic and community life.

Access to Opportunity for People with Disabilities

As shown in Chart 1.1.36, nearly half of people with disabilities (49%) live in Low Resource or High Segregation and High Poverty areas. The disproportionate concentration of people with disabilities in lower resource areas of the city is likely due to the lack of affordable and accessible housing in the Higher and Highest resource areas where only an estimated 29% of the population resides.

Chart 1.1.36: **Percentage of Disabled Population by Opportunity Area**



Source: 2019 American Community Survey, 5-Year Summary Data

Unhoused people with disabilities, like those living on Skid Row, typically need low-cost rental housing with highly specialized integrated services and varying levels of case management intensity. In recent years, the additional construction of permanent supportive housing (PSH) units has been financed by the \$1.2 billion bond measure approved by Los Angeles City voters through Proposition HHH. As shown in Table 1.1.8, the majority of permanent supportive housing units (76%) are located in Low Resource or High Segregation and High Poverty areas and only 12% of PSH units are located in High or Highest Resource areas. As detailed in the 2021 Fair Share Housing Distribution Report to City Council, developing affordable housing in Higher Resource areas typically increases development costs due to increased land values, design review requirements, and community opposition that causes a lengthy entitlement process with more risk and uncertainty. The cost considerations related to PSH development should be balanced with the need to affirmatively further fair housing and increase people with disabilities' access to areas with opportunity and a high level of resources.

Table 1.1.8: Proposition HHH Developments as of July 2021

	Total Projects	Total Supportive Housing Units	Total Units	Percent of Projects	Percent of Supportive Housing Units	Percent of Total Units
Highest Resource	9	383	467	8%	7%	7%
High Resource	7	259	424	6%	5%	6%
Moderate Resource (Rapidly Changing)	2	121	128	2%	2%	2%
Moderate Resource	10	604	687	9%	11%	10%
Low Resource	38	1809	2337	35%	32%	33%
High Segregation and High Poverty	43	2464	3140	39%	44%	44%

Source: HCD 2021 Opportunity Maps, HHH data as of July 2021

The city is committed to providing more affordable and accessible housing in higher resource areas (refer to Goals 1 and 4, Policies 1.3.1 and 4.1.3), however, it is also important to note that High and Highest Resource areas may also present significant challenges in meeting the needs of residents with disabilities. Higher resource areas typically have less access to public transit than lower resource areas, which is difficult for people with disabilities who are transit dependent to live in these areas.

Educational Opportunity for People with Disabilities

The city's 2018–2023 AFH found significant disparities in educational access and outcomes for people with disabilities. Approximately 200,000 students with disabilities are enrolled in schools in Los Angeles County. Based on 2017 standardized testing data, students with disabilities had the lowest level of academic performance and their performance had not increased from previous years. Focus groups conducted with various stakeholders cited the lack of integrated educational services for students with disabilities as part of the reason for the disparities in outcomes. Focus group attendees also cited the different standards of services for special needs populations in traditional schools, magnet schools, and charter schools as a significant barrier to accessing education that's tailored to meet each child's unique needs. Using data from LAUSD, the AFH also found that students with disabilities had the lowest rates of graduation of any other group.

In 2003, LAUSD entered into a Modified Consent Decree (MCD) as a result of *Chanda Smith vs Los Angeles Unified School District*,²¹ “establishing 18 measurable outcomes, as well as requirements for developing an integrated student information system, improving access in Los Angeles Unified School District (District) facilities, and ensuring there are no systemic problems with substantial compliance of special education laws and regulations.”²² Despite modest increases reported during the MCD, which ended in 2019, student enrollment at Charter and Magnet schools, students with disabilities enrollment is 11.6% and 7%, respectively, representing less than 20,000 students. Additional funding to retain educators, and provide an inclusive educational environment is key to setting persons with disability on a path to success and access opportunity.

Accessible Transportation and Public Infrastructure for Persons with Disabilities

Public Transportation

LA Metro, which operates bus and rail services in the City, has accommodations such as elevators, ramps and signage on all of its buses, trains, and stations to ensure that they are accessible to people who use wheelchairs and individuals with visual disabilities. However, the primary barriers to accessing LA Metro’s rail and bus service appear to be the distance between where people with disabilities live and stops and inaccessible sidewalks between places of residence and stops, also known as “First Mile/Last Mile.” In 2016, LA Metro Board of Governors passed a motion for the integration of first/last mile improvements as part of infrastructure for all new rail and bus rapid transit projects. The First/Last Mile Strategic Plan that accompanies this motion and current studies include the Green Line Extension to Torrance, first phase of the Purple Line Extension, Expo Line, Crenshaw/LAX, as well as improvements connected to Affordable Housing and Sustainable Communities-funded projects. With the proliferation in rideshare companies, accessibility concerns have risen from disability advocates. In 2019, the organization Disability Rights Advocates filed a class-action complaint in the US Northern District against Lyft for violating the Americans with Disabilities Act for failing to ensure service for those that require wheelchair accessible vehicles.²³ A ruling on the case is expected sometime in late 2021.

Inaccessible public and private infrastructure are a significant contributing factor to disparities in access to opportunity for people with disabilities, limiting, in particular, access to transportation, employment, and retail. In the public realm, the City has made

21. The Chanda Smith Consent Decree was entered on April 26, 1996.

22. Office of the Independent Monitor, “The Office of the Independent Monitor’s Final Report Concluding the Modified Consent Decree: Successes, Challenges and Lessons Learned.” December 13, 2019. <http://oimla.com/pdf/20191212/1.pdf>

23. KQED, “Lyft’s Got to Look Into Its Own Soul’: Judge Weighs Requiring Lyft to Provide Wheelchair Users Equal Service,” June 9, 2021; <https://www.kqed.org/news/11876977/lyfts-got-to-look-into-its-soul-judge-weighs-requiring-lyft-to-provide-wheelchair-users-equal-service>

a concerted effort to improve the accessibility of its streets. In December of 2016, the City of Los Angeles launched Safe Sidewalks LA, a 30-year, \$1.4 billion program to make sidewalks accessible to everyone in compliance with the Sidewalk Repair Program Settlement Agreement. One of the program objectives is to “ensure the continued and efficient compliance with the requirements of the Settlement while amending the existing program for sidewalk and curb ramp improvements within the City, in accordance with the applicable accessibility requirements, including those required by the American with Disabilities Act (ADA).”

In the public realm, the City has made a concerted effort to improve the accessibility of its streets. In December of 2016, the City of Los Angeles launched Safe Sidewalks LA, a 30-year, \$1.4 billion program to make sidewalks accessible to everyone in compliance with the Sidewalk Repair Program Settlement Agreement. One of the program objectives is to “ensure the continued and efficient compliance with the requirements of the Settlement while amending the existing program for sidewalk and curb ramp improvements within the City, in accordance with the applicable accessibility requirements, including those required by the American with Disabilities Act (ADA).”

Government Facilities

Accessibility problems limit the housing choices of people with disabilities, further limit their ability to seek out and receive housing-related assistance, and limit access to education, jobs, and recreation. Although the City has taken strides toward improving accessibility to government services and facilities, there still remains progress to be made. In its five-year Consolidated Plan and the subsequent annual action plans, the City dedicated portions of its CDBG funds to upgrading community services centers.

In terms of recreational areas, the distribution of Universally Accessible Playgrounds roughly coincides with the distribution of people with disabilities in general and also with people with disabilities in the age range of 5–17. However, this pattern of improvement has not been consistent across all areas of government services and facilities. The City’s Department of Recreation and Parks currently has several Universally Accessible Playgrounds where children of all abilities can play, which can be accessed online. In the entire South Los Angeles area, there are only 4 Universally Accessible Playgrounds, and in Boyle Heights are no accessible playgrounds. In the field of education, the Los Angeles Unified School District has been the subject of numerous allegations of disability discrimination. A court-appointed independent monitor of the school district also reported in 2015 that school facilities were still insufficient to meet the needs of students with disabilities. Additionally, even the improvements that the City has planned largely address mobility disabilities rather than hearing, vision, or cognitive disabilities.

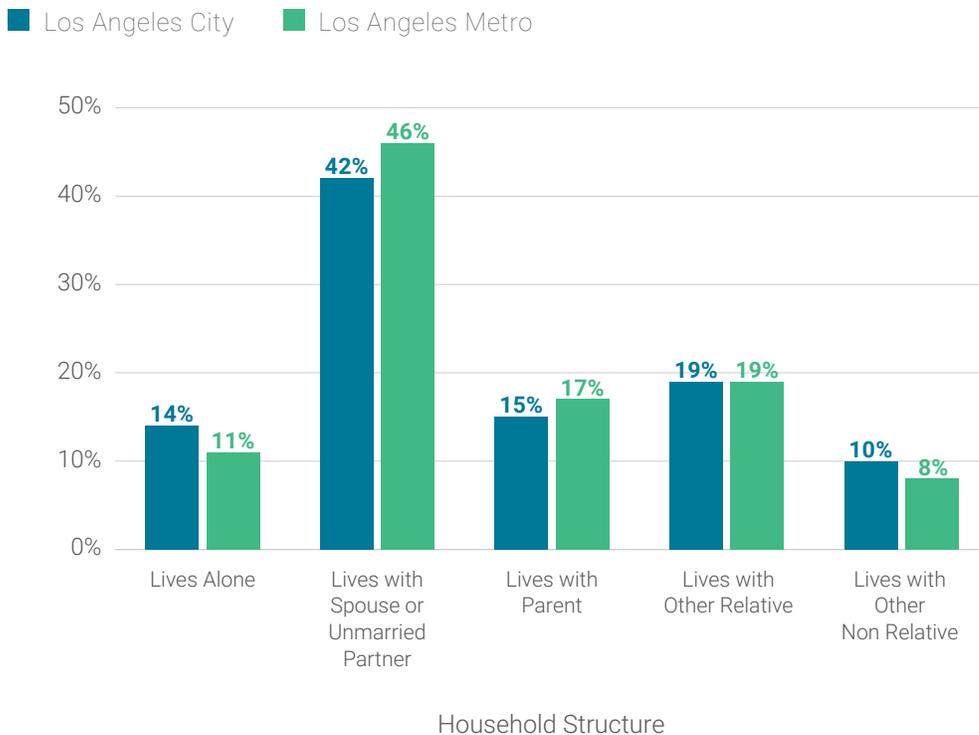
Fair Housing Analysis by Household Size and Type

Families and households in the city come in a wide variety of sizes and configurations and it is important to plan for housing that can accommodate the diversity of many living arrangements.

Housing Needs by Household Size and Type

The census categorizes families based on living arrangements. The majority of Angelinos over the age of 18 live as a family – including 42% of people who live with a spouse or partner, 15% who live with their parents, and 19% who live with other relatives. Roughly one in seven Angelinos (14%) live alone and an additional 10% of Angelinos live with a non-relative such as a roommate. Compared with the metro area, the City of Los Angeles has a slightly greater share of people living alone and people living with non-relatives, as shown in Chart 1.1.37 below.

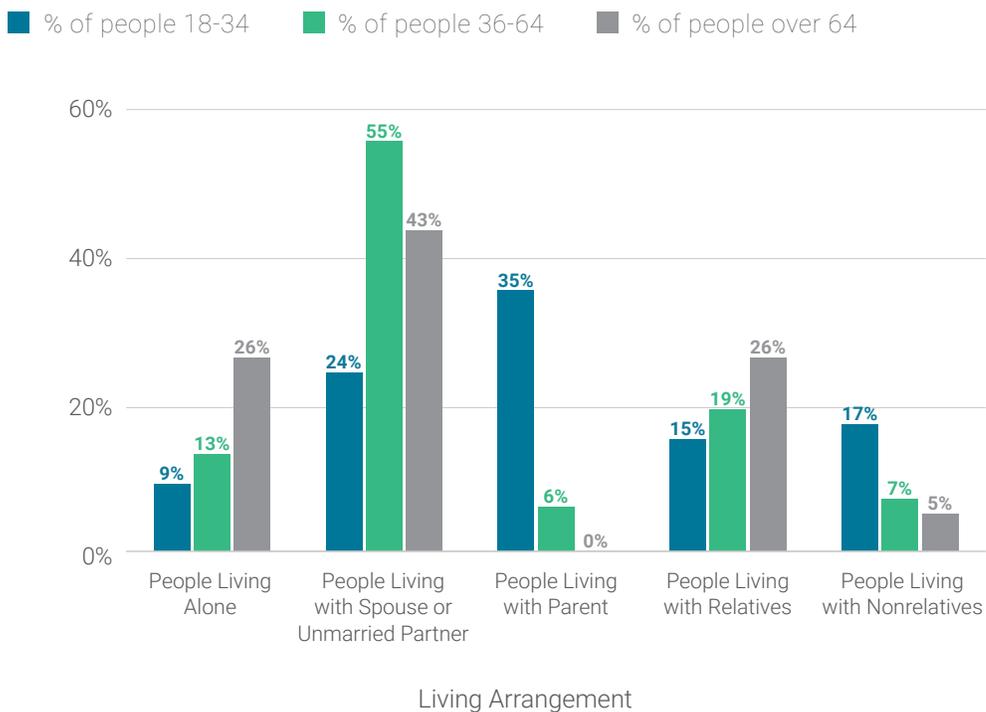
Chart 1.1.37: **Household Structure in LA City and Metro Area**



Source: HUD CHAS data 2013-2017

Living arrangements and family structures vary substantially by the age of the householder. For example, 35% of Angelinos aged 18–34 live with their parents and 17% live with non-relatives, which is significantly higher than any other age group. Seniors are the most likely to live alone or with relatives, and people aged 34–64 are the most likely to live with a spouse or unmarried partner. The high rate of people living with adult children and other relatives speaks to the need for variation of housing options that can accommodate multi-generational living and non-traditional family structures.

Chart 1.1.38: Living Arrangements by Age



Source – HUD CHAS data 2013–2017

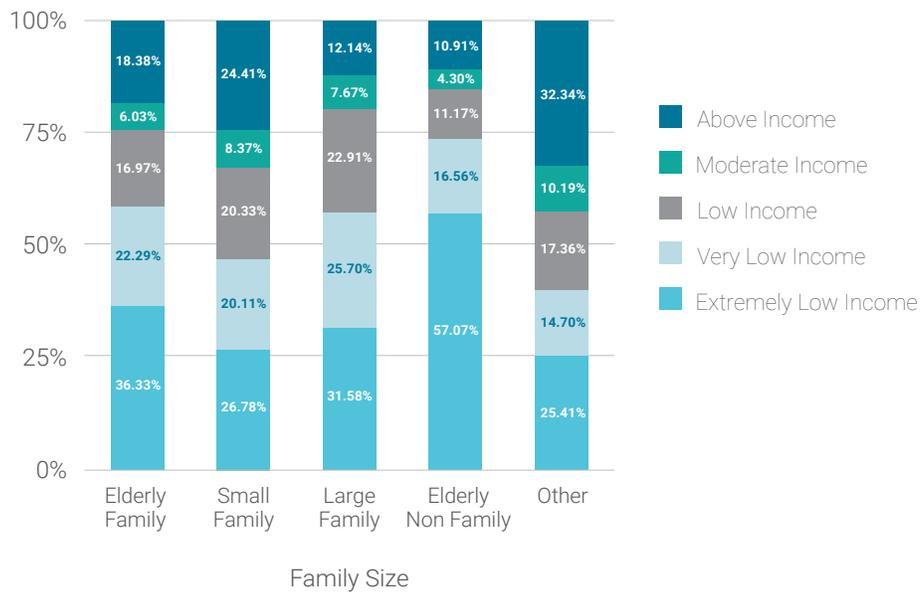
HUD categorizes families slightly differently and reports on the housing needs for five distinct family types: elderly family (defined as 2 people with either person 62 years or older), small families (defined as 2 persons, neither person 62 years or over, or 3 or 4 persons), large families (defined as 5 or more people), elderly non-families, (defined as 1 or 2 non-family people with either 62 years or older), and other non-family households (which includes individuals living alone or with roommates).

According to the latest HUD Comprehensive Housing Affordability Strategy (CHAS) Data, elderly people living alone have the most acute housing needs. Over 57% of elderly people living alone are extremely low-income and 41% are severely cost burdened. Elderly people living with families have a much lower rate of cost burden and are less likely to be

extremely low-income than those living alone but are still fairly housing insecure. More than one third of elderly families are extremely low-income and severely cost burdened.

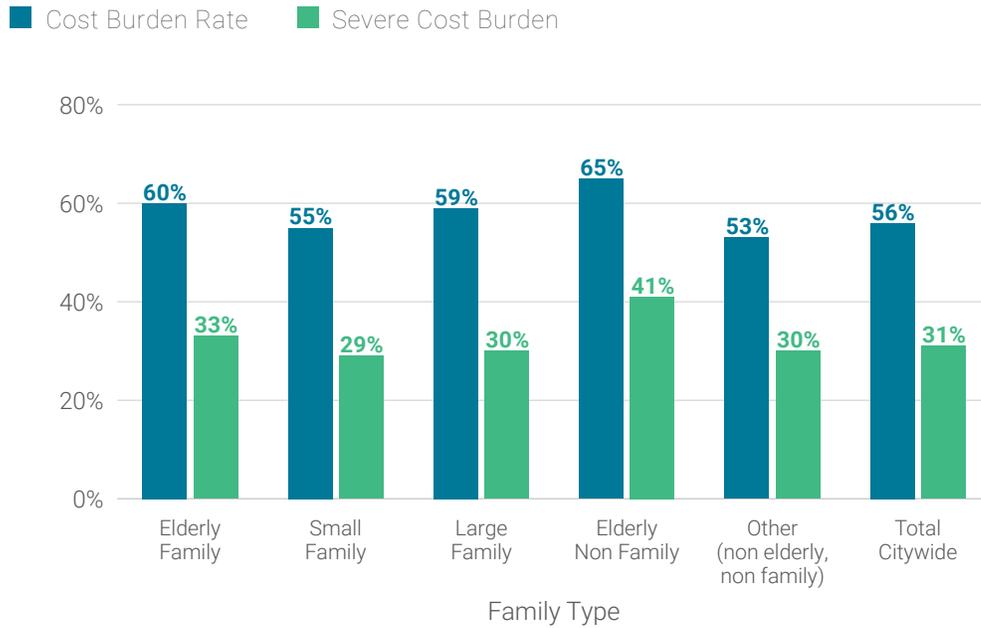
Large family households, defined as those with five or more people, also face significant housing insecurity. Nearly 58% of large family households that rent are Very Low- or Extremely Low-Income and 59% are cost burdened. As mentioned in Chapter 1, there is a shortage of large family housing in the city and as of 2019 only 12% (163,000) of combined renter- and owner-occupied units contained four or more bedrooms and only 30,000 of these were rentals. As of the most recent HUD CHAS data (2013–2017), there are 84,290 large family renter households which means there is approximately one appropriately sized rental unit for every three large family households.

Chart 1.1.39: Income Category by Family Size for LA City Renters



Source: HUD CHAS data 2013–2017

Chart 1.1.40: **Cost Burden Rate and Severe Cost Burden**



Source: HUD CHAS data 2013–2017

It is important to note that while elderly households and large family households have higher rates of housing insecurity, small families and other non-family households (which include non-elderly people living alone or with roommates) make up the largest portion of the city’s lower income households. As shown in the chart below, 86,970 extremely low-income people live in small families and 81,010 live in non-family, non-elderly households. Combined, they constitute 64% of the total extremely low-income population. The overwhelming housing needs for single, lower-income people and lower-income people living in small families underscores the importance of continuing to produce non-senior, smaller sized affordable housing units.

Chart 1.1.41: **Income Category by Family Size**



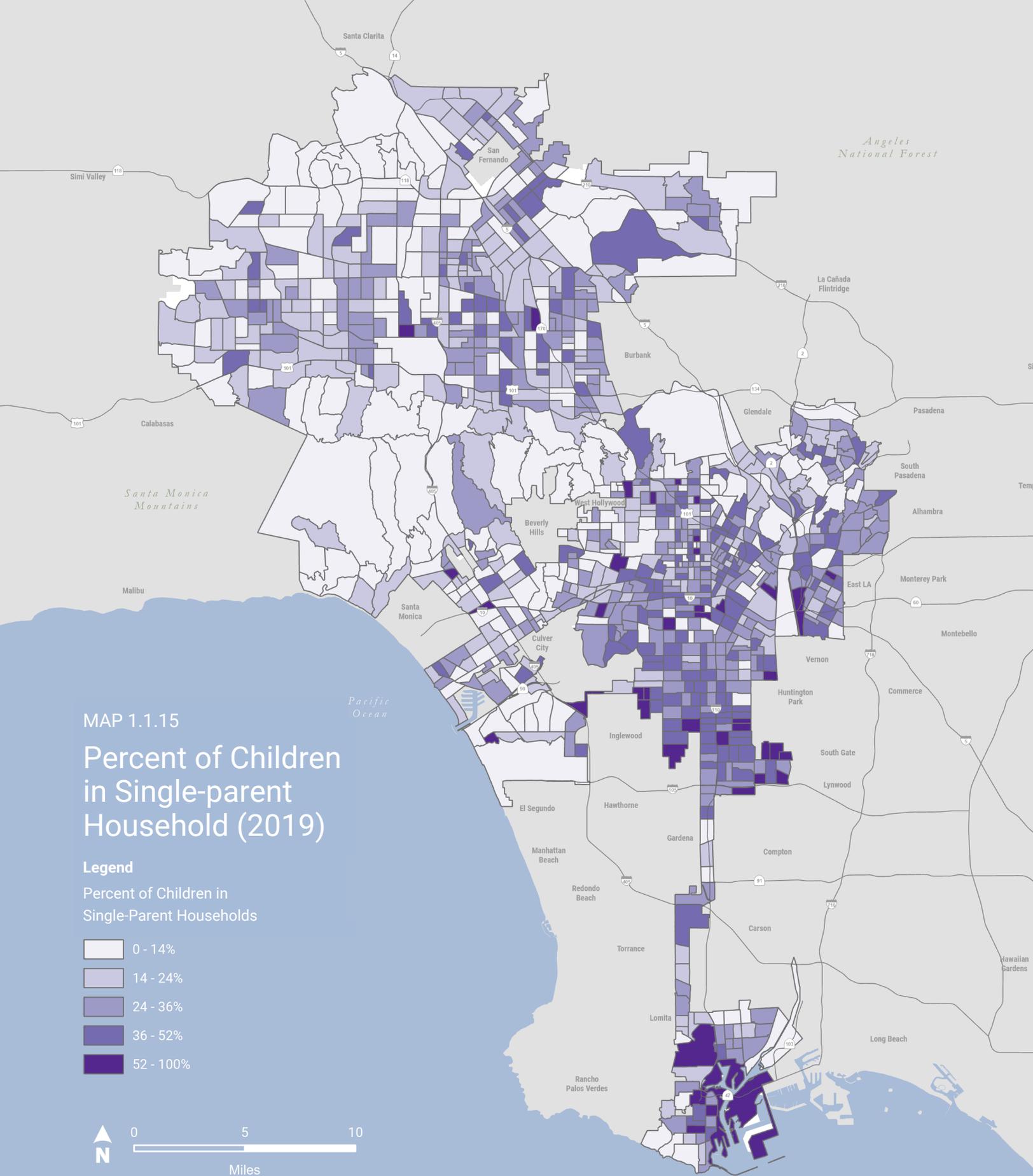
Source: HUD CHAS data 2013–2017

Another type of household that faces significant housing insecurity is single-parent families. There are an estimated 289,443 single-parent households in the city, of which 122,968 (40%) have children under the age of 18. Many single-parents with young children leave the labor market or experience challenges securing employment that accommodate families’ needs, particularly if the cost of childcare exceeds their monthly income. As a result, single-parent households have a poverty rate nearly triple that of two-parent households (38% compared to 13%, respectively). This underscores the need for affordable housing options with high quality affordable childcare onsite. These are essential needs for the economic stability of single-parent households and a parent’s ability to find and retain gainful employment.

Segregation Patterns by Household Size and Type

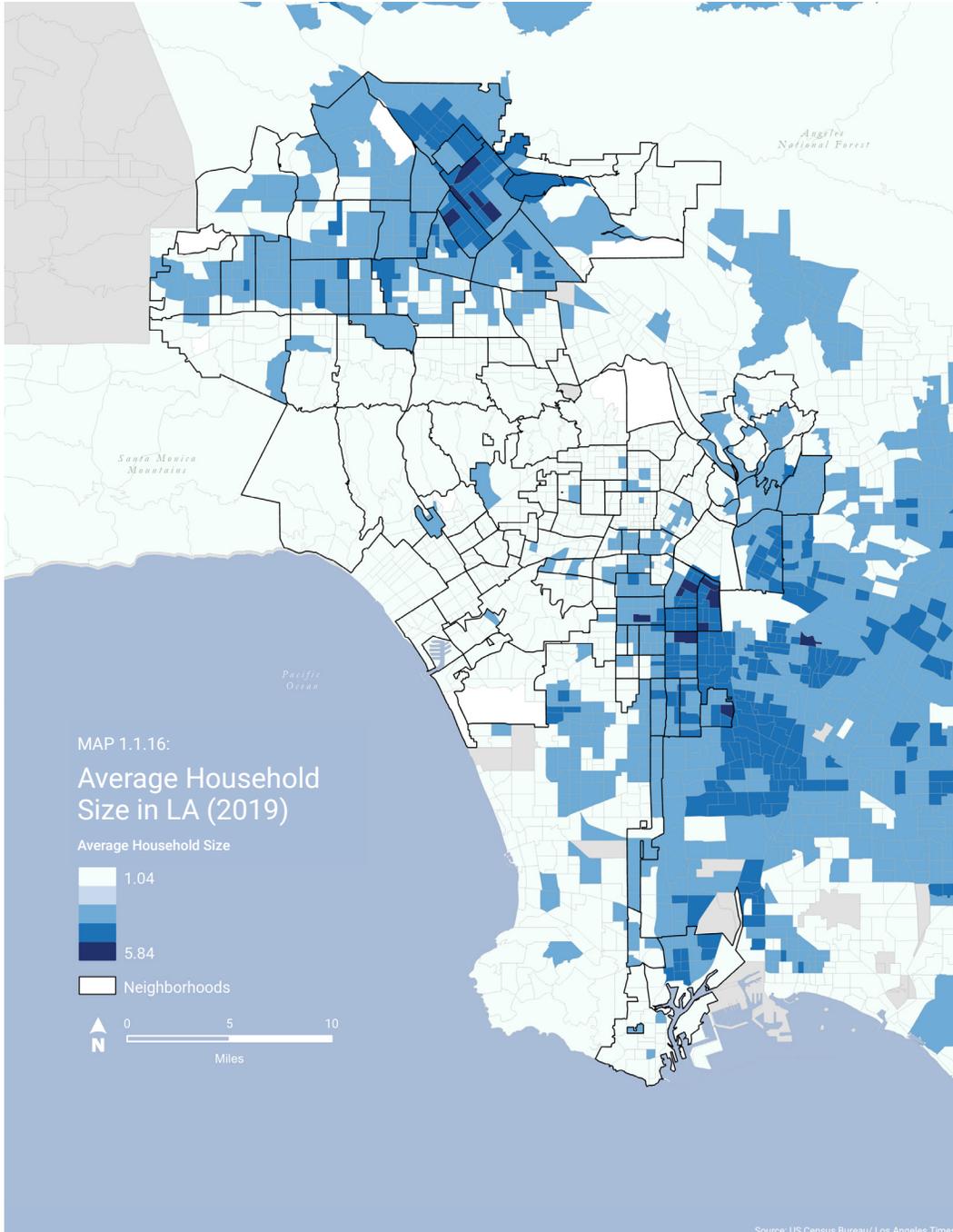
Single-parent Households

Single-parent households are very common in Los Angeles and nearly every neighborhood in the city has a significant percentage of children living with one parent. In fact, there are 50 census tracts in which over half of all children live with one parent. As shown in Map, 1.1.15 these census tracts are dispersed throughout the city, but are most prevalent in South Los Angeles and the Harbor area. South Los Angeles, as mentioned previously, is primarily comprised of Black and Latinx households with a large proportion of people living in poverty.



Large Families

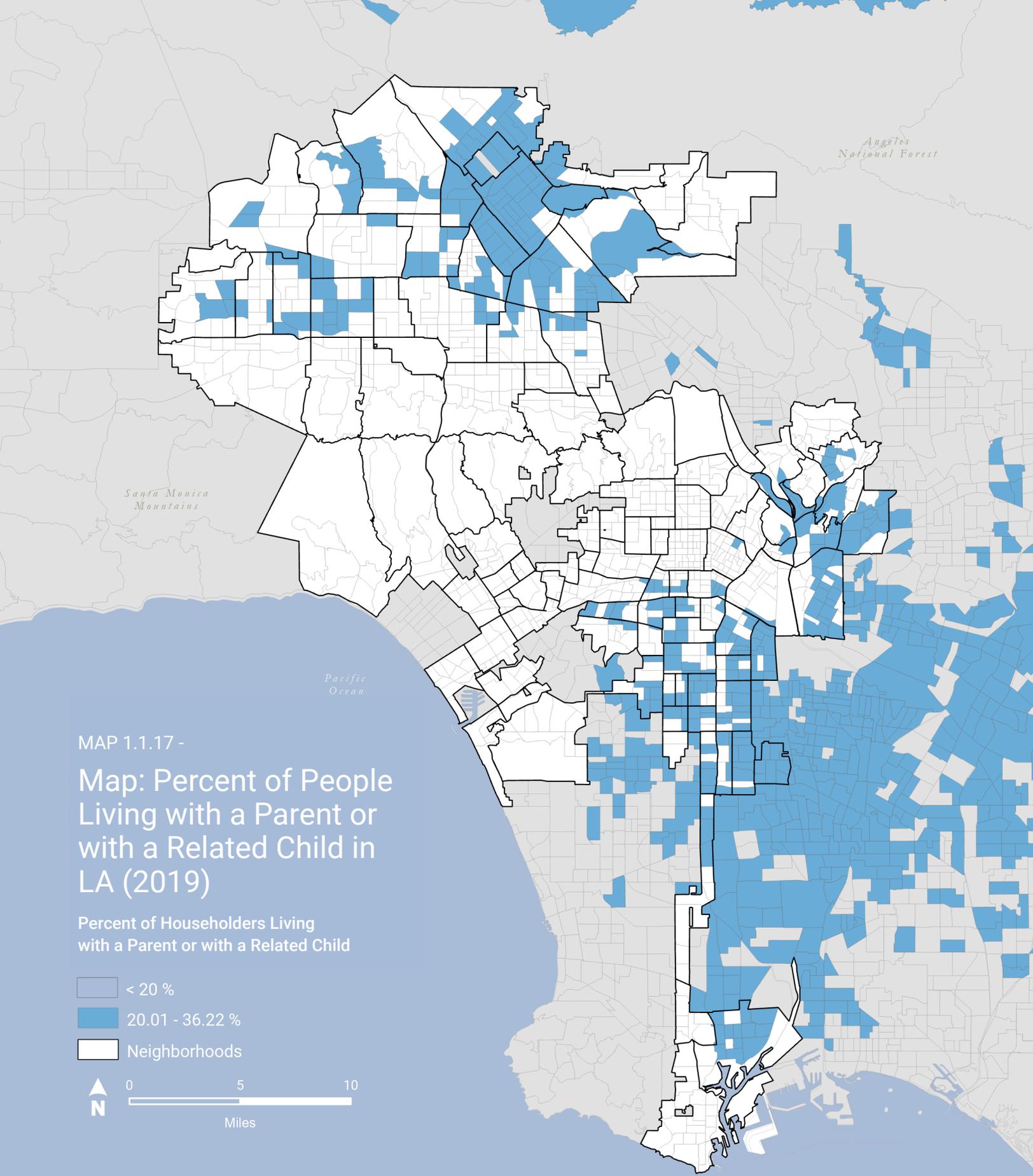
The areas with the largest average family size are located in the Northeast Valley, such as neighborhoods of Pacoima and Arleta, and Southeast LA. As mentioned previously, Latinx households have a larger average family size than any other racial groups and the maps of average household size closely mirror the maps showing the percentage of Latinx households (on page 19). These areas also have the highest rate of overcrowding in the city.



People Living with a Parent or Relative

People living with a parent or relative in larger proportions are primarily found in the Northeast Valley, Canoga Park, South and Southeast Los Angeles, East Los Angeles, and Central LA . In several neighborhoods in South/Southeast LA, East LA, Westlake, Sun Valley and Canoga Park, more than a third of households live with a relative. These areas all have a greater proportion of immigrants and have some of the highest rates of overcrowding and the largest average family size.

The proportion of people living with their parents have a similar geographic concentration pattern and there are several neighborhoods in the Northeast Valley, South LA, Southeast LA, East LA, and the South Bay where more than 25% of households include an adult child living with their parents.



MAP 1.1.17 -

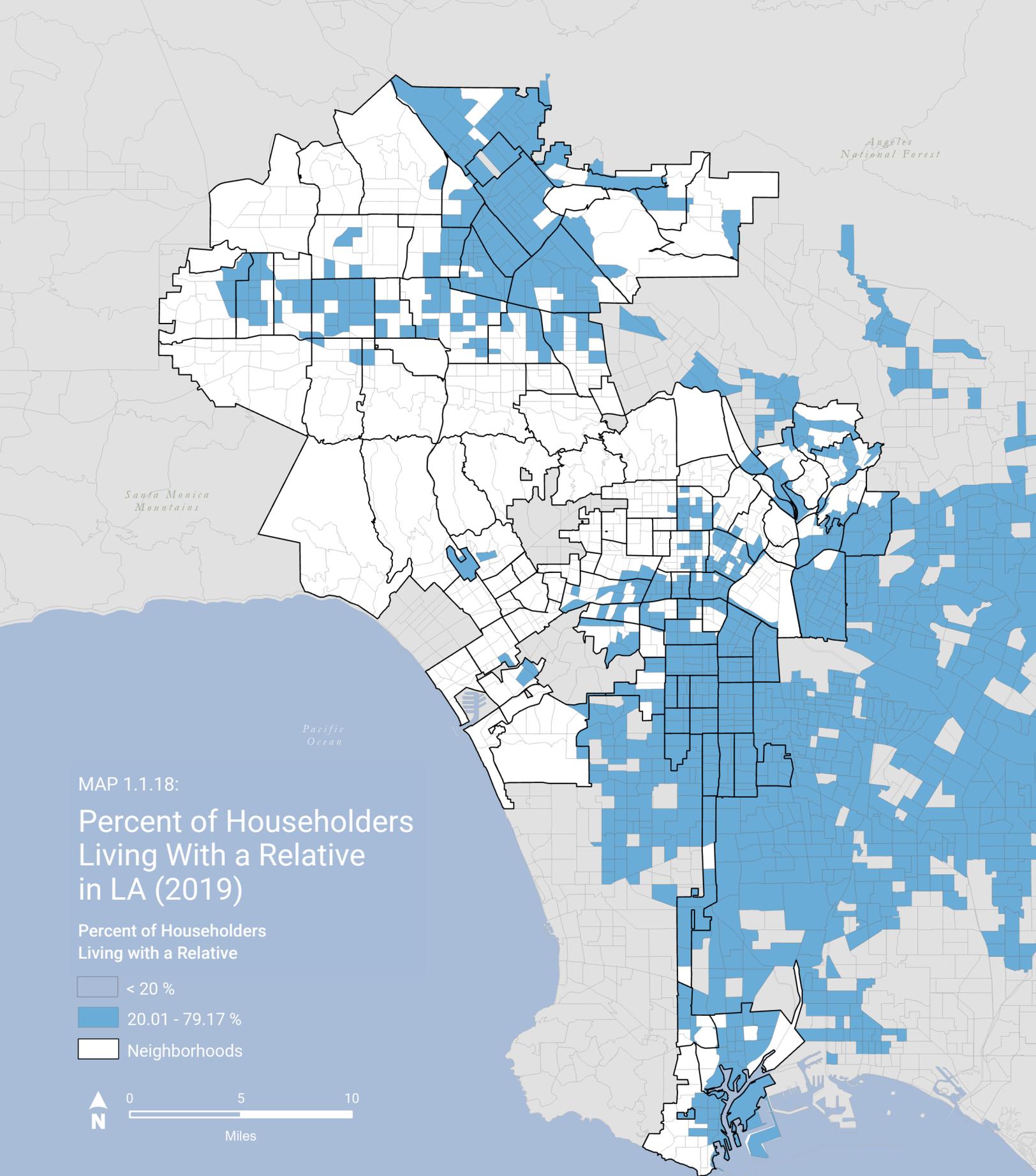
Map: Percent of People Living with a Parent or with a Related Child in LA (2019)

Percent of Householders Living with a Parent or with a Related Child

- < 20 %
- 20.01 - 36.22 %
- Neighborhoods

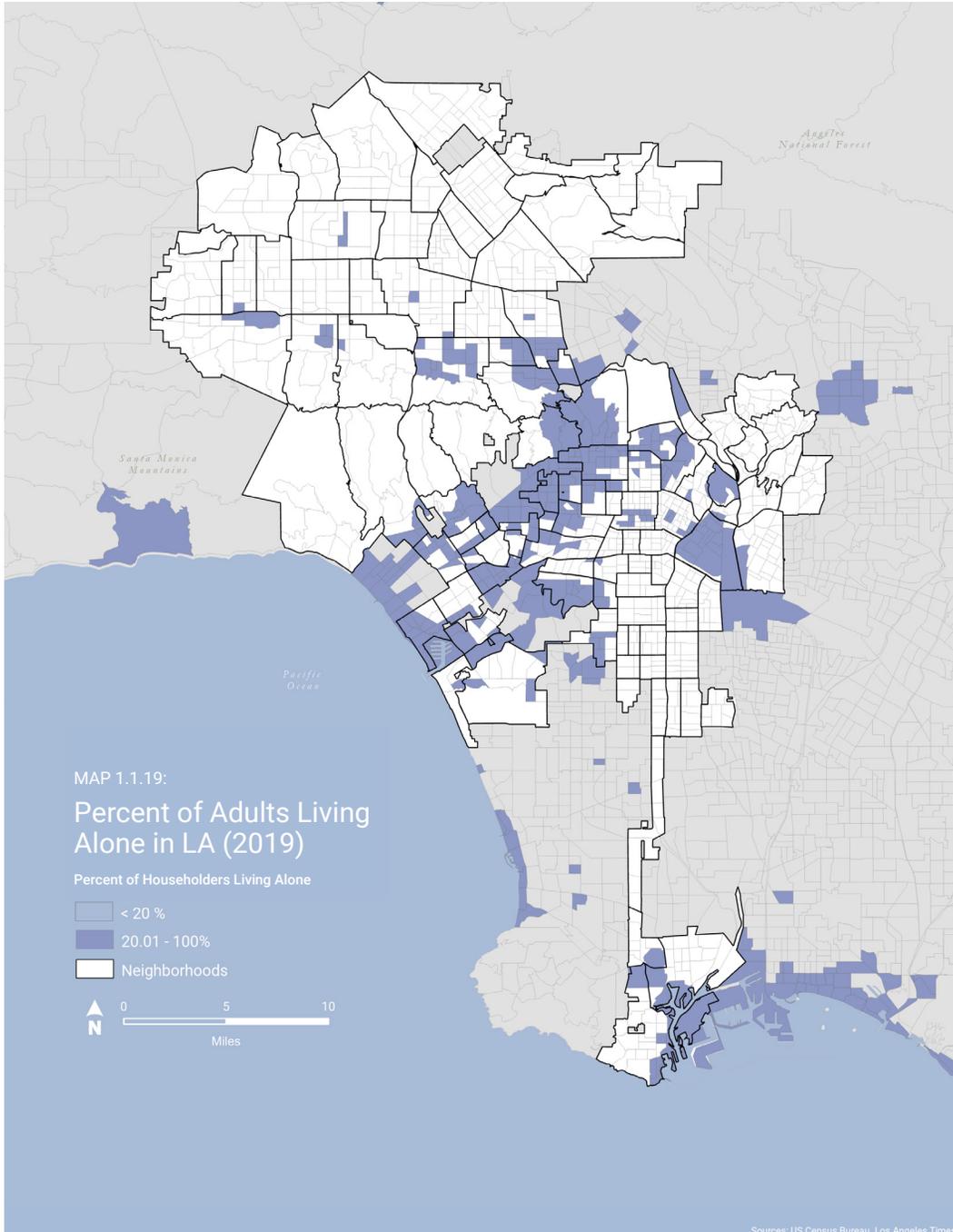


Source: US Census Bureau/ Los Angeles Times



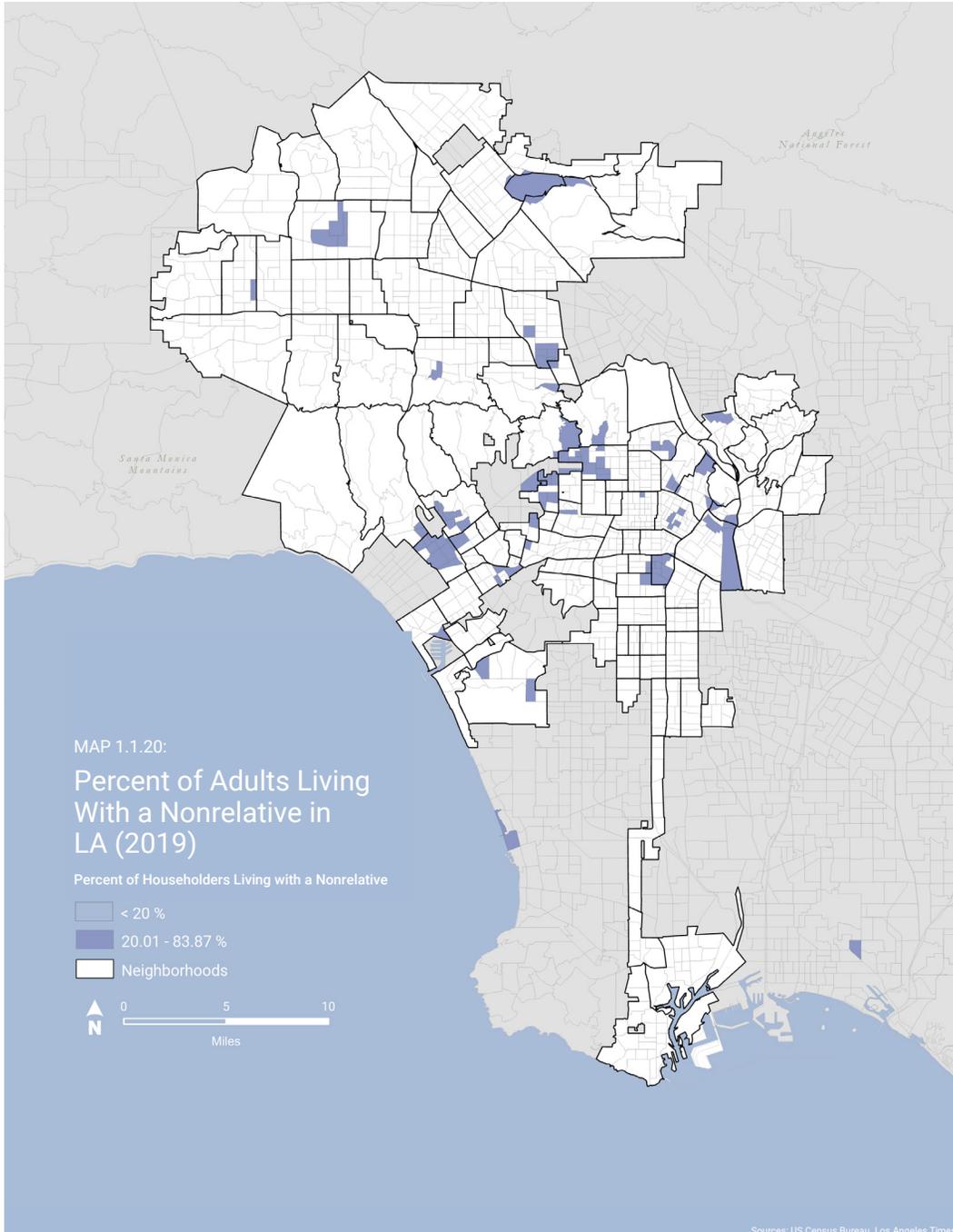
Adults Living Alone

Areas with a greater proportion of adults living alone include Downtown, Northeast LA, Central and West LA, Southwest LA, and the South San Fernando Valley (including Sherman Oaks, Studio City, Valley Village, and North Hollywood). These neighborhoods tend to fall into two demographic extremes that include either a substantial number of older adult homeowners (in the case of West and Southwest LA and the San Fernando Valley) or younger adult renters (in the case of Northeast LA, Mid Wilshire, and Hollywood).



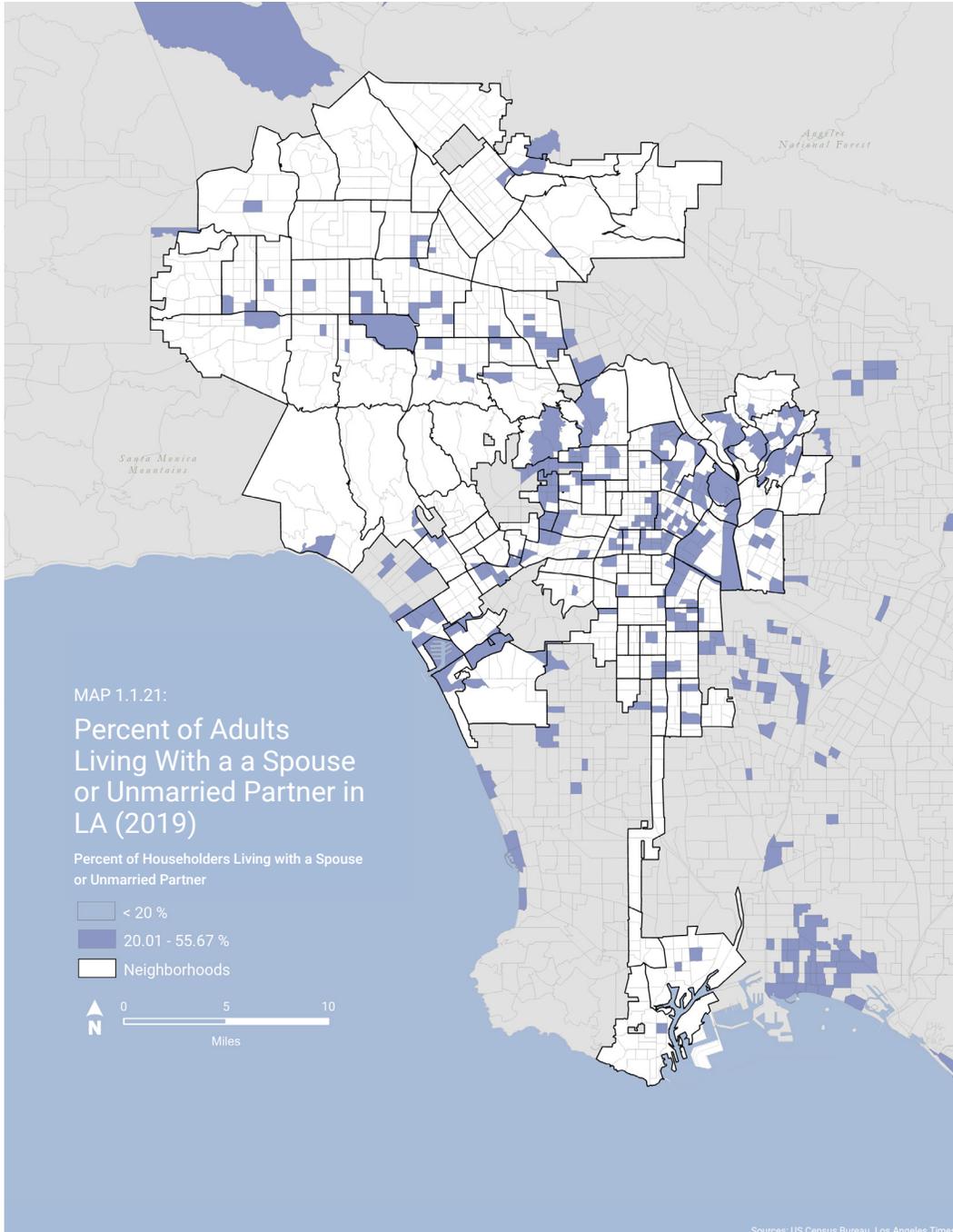
Adults Living with a Non-Relative

Adults who live with non-relatives are primarily concentrated in areas around universities – including Northridge, Westwood, and Exposition Park (near USC). Other neighborhoods with a high percentage of adults living with non-relatives include North Hollywood, Hollywood, Beverly Grove, Palms, Venice, Westchester, Los Feliz, Silverlake, Glassell Park, Echo Park, Westlake, Chinatown, and Downtown.



People Living with Spouses or Unmarried Partners

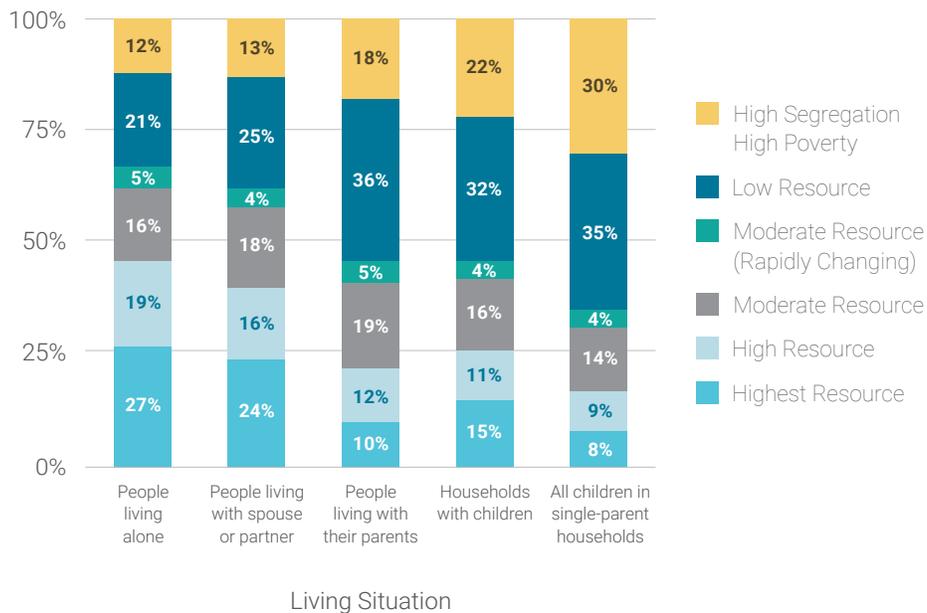
People living with spouses or unmarried partners are fairly distributed throughout the city. The areas with the greatest concentrations of this kind of household do not follow any specific geographic pattern.



Access to Opportunity by Household Type

People living alone and people living with a spouse/partner are the most likely to live in High or Highest Resource areas. Nearly half (46%) of people living alone and 40% of people living with a spouse/partner live in High or Highest resource areas. In contrast, over half (54%) of all households with children or those living with their parents disproportionately reside in Low Resource, or High Segregation and High Poverty areas. When only single-parent households are considered, the disparity is more acute, with nearly two-thirds (65%) living in these lowest resource areas. Access to higher resource neighborhoods is particularly important for families with children and single-parent households because these areas tend to have higher performing schools, more green space, and lower levels of violence.

Chart 1.1.42: **Access to Opportunity by Household Status**



Source: HUD CHAS data, 2013–2017

Additional Analysis Including Displacement

The Plan to House LA prioritizes preventing displacement as part of its commitment to racial and social equity. Despite decades of marginalization and systemic disinvestment, BIPOC residents have built thriving neighborhoods with important cultural amenities and strong neighborhood connections. At the same time, a tight housing market combined with changing consumer preferences among wealthier renters and homebuyers, has led to dramatic rent increases in many of these same areas. As a result, many long-term residents have been “priced-out” of their neighborhoods or pressured into moving, impacting their ability to benefit from these long desired investments.

The Rent Stabilization Ordinance (RSO) provides renters the strongest protections against excessive rent increases and arbitrary evictions and is the City’s best tool to maintain housing stability. Rent increases are allowable only once a year and restricted to a maximum percentage which has most steadily remained at 3%. Only fourteen legal reasons are permissible for evictions under RSO. When an approved eviction is due to no fault of the tenant, they are entitled to permanent relocation assistance to compensate for their displacement. Still, as the data reveals renters remain largely rent burdened resulting in the increased risk of displacement. When a household is displaced, finding a comparable unit to size and rent will be nearly impossible—especially for previous long-term tenancies.

Rents are reset to market-rate levels upon the termination of tenancies—what is called vacancy de-control and authorized by the state’s Costa-Hawkins Act. When the demand to live in particular neighborhoods increases—especially in gentrifying neighborhoods—landlords of RSO properties may seek to capitalize on the rising rents by displacing long-term and vulnerable residents. Based on recent data on tenant complaints, no-fault eviction filings, and RSO housing unit withdrawals and demolitions, displacement pressure appears to have increased over the past five years.

The COVID-19 pandemic only exacerbated the existing conditions for renters. A survey study on renter distress by the UCLA Lewis Center for Regional Policy Studies²⁴ found that nearly half of Los Angeles County renters owe some amount of back rent and the ability to pay full rent had become more challenging in 2021 compared to 2020. Renters are using various means to pay rent through emergency loans, credit cards, personal savings, and friends or family, and foregoing utility payments and basic necessities such as food. And even with a current eviction moratorium in place, the study found that verbal eviction threats had risen from 16% in 2020 to 25% in 2021 among respondents.

24. Michael Manville et al., “End of the Pandemic, bu Not Renter Distress” (UCLA Lewis Center for Regional Policy Studies, July 2021), <https://www.lewis.ucla.edu/research/covid-renter-distress-2021/>

More consequential, nearly one in five tenants reported being served with a written eviction notice--demonstrating a real threat of mass displacements upon the end of the moratorium. Tenants facing both mounting rent and consumer debt as well as pressure from their landlords, may unwillingly agree to move or accept less relocation than they are lawfully entitled to.

As described below, existing maps and indices of neighborhood change and gentrification demonstrate displacement risk levels are strongest in census tracts that are composed of primarily Black and Latinx residents. The City of Los Angeles will be building on these existing tools and conducting additional studies on displacement risk to understand which neighborhoods in the city will require dedicated resources and proactive monitoring to implement the necessary anti-displacement strategies.

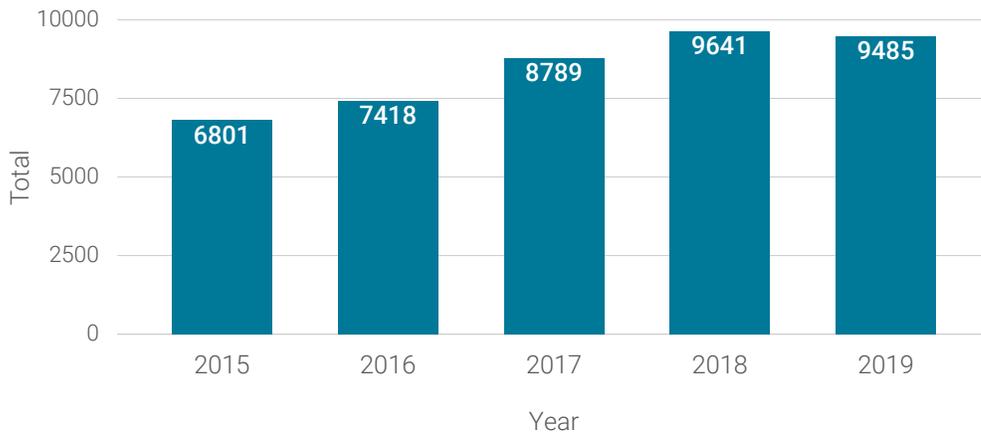
RSO Complaints, Evictions, and Demolitions

An analysis of the Los Angeles Housing Department's (LAHD) administrative record found that since 2015 there has been a steady increase in RSO complaints, Ellis Act evictions, and tenant buyout filings. The increase is likely due to a spike in new development and real estate speculation, which often results in the demolition or remodeling of RSO units and the displacement of long-term tenants. Since May 12, 2020, an ordinance has been in place prohibiting evictions due for non-payment of rent due to the COVID-19 pandemic.²⁵ Since LAHD has not processed RSO eviction filings since early 2020 due to COVID-19 related protections, the data in this section only reflects trends through 2019.

Tenants in units subject to the Rent Stabilization Ordinance (RSO) can file a complaint with LAHD under the following circumstances: 1) non-registration of rental unit; 2) illegal eviction (notice to evict based on false and deceptive grounds); 3) non-payment of relocation assistance; 4) illegal rent increase; 5) reduction of services; 6) failure to post RSO notice; 7) illegal buyout agreement; and 8) required online payment/electronic fund transfer. The most common complaints are related to illegal rent increases and illegal evictions. As shown in the chart below, RSO complaints have increased by nearly 40% from 6,801 in 2015 to 9,485 in 2019. The increase in complaints suggests an increase in tenant harassment, intimidation, and potential displacement.

25. C.F. No. 20-0147-S19 , Final Ordinance No. 186606

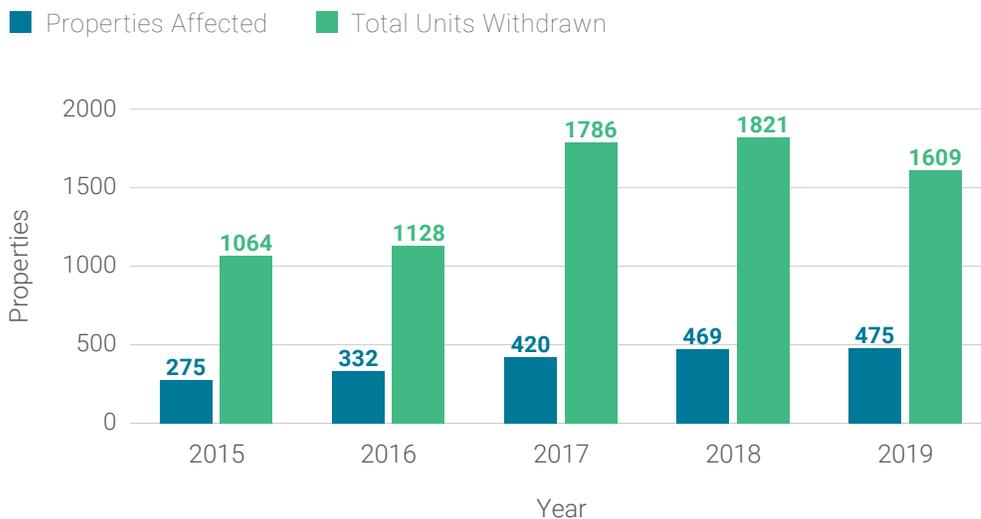
Chart 1.1.43: **RSO Complaints by Year**



Source: LAHD

RSO tenants are protected from no-fault evictions except under certain circumstances. Most lawful, no-fault evictions occur because the property owner wishes to occupy the unit themselves, rent the unit to a family member or property manager, demolish the unit permanently, or remove the unit from the rental market. The ability to exit the rental market, demolish RSO units and redevelop the land, or convert an existing building to condominiums is all allowed under the Ellis Act, which has been state law since 1985. As shown in Chart 1.1.44, the total number of properties and units withdrawn from the rental market through the Ellis Act has increased significantly since 2015. The number of units peaked in 2018 with 1,821 units withdrawn from the rental market and the number of properties peaked in 2019 at 475.

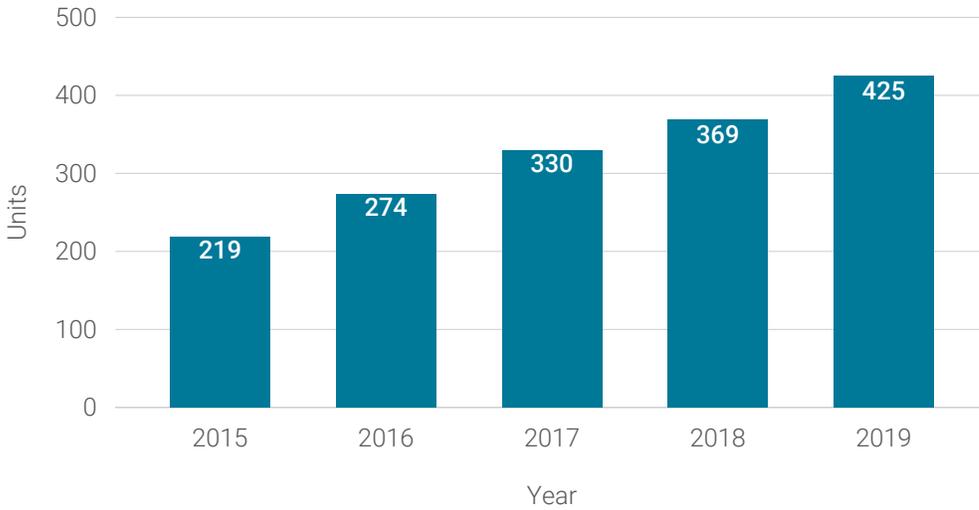
Chart 1.1.44: **Ellised Properties and Units 2015–2019**



Source: LAHD

Property owners are required to file no-fault evictions, including Ellis Evictions, with LAHD and pay the tenants relocation assistance. Once LAHD has verified that all tenants have received the maximum allowable relocation assistance, RSO units are allowed to be demolished. As shown in the chart below, RSO demolitions increased by nearly 60% from 1,064 units in 2015 to 1,609 units in 2019.

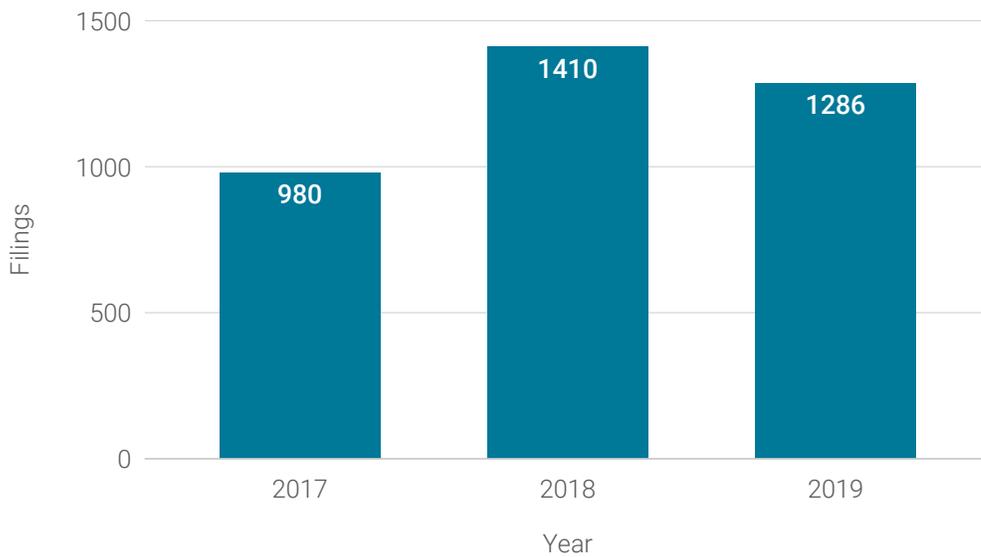
Chart 1.1.45: **Demolitions of RSO Units**



Source: LAHD

Aside from the formal eviction process, property owners/landlords are also allowed to offer tenants money or other consideration to voluntarily move out of an RSO unit. This is considered a Buyout Agreement and commonly referred to as “Cash for Keys.” The landlord must file a copy of the signed and dated Disclosure Notice and Buyout Agreement with LAHD within 60 days of both parties signing the Buyout Agreement. Tenants are not required to sign a Buyout Agreement and property managers are prohibited from coercing tenants into accepting an offer. Despite the legal protections in place, many tenants are unaware of their rights and may feel pressured into leaving or accepting less compensation than they are entitled to under the RSO. Tenant Buyout Agreements filed with LAHD peaked in 2018 at 1,410 and remained high in 2019. It is important to note that these numbers only reflect Buyout Agreements that were legally filed with LAHD. Tenants and landlords that reach informal agreements are not captured in this data.

Chart 1.1.46: **Tenant Buyout Filings by Year**

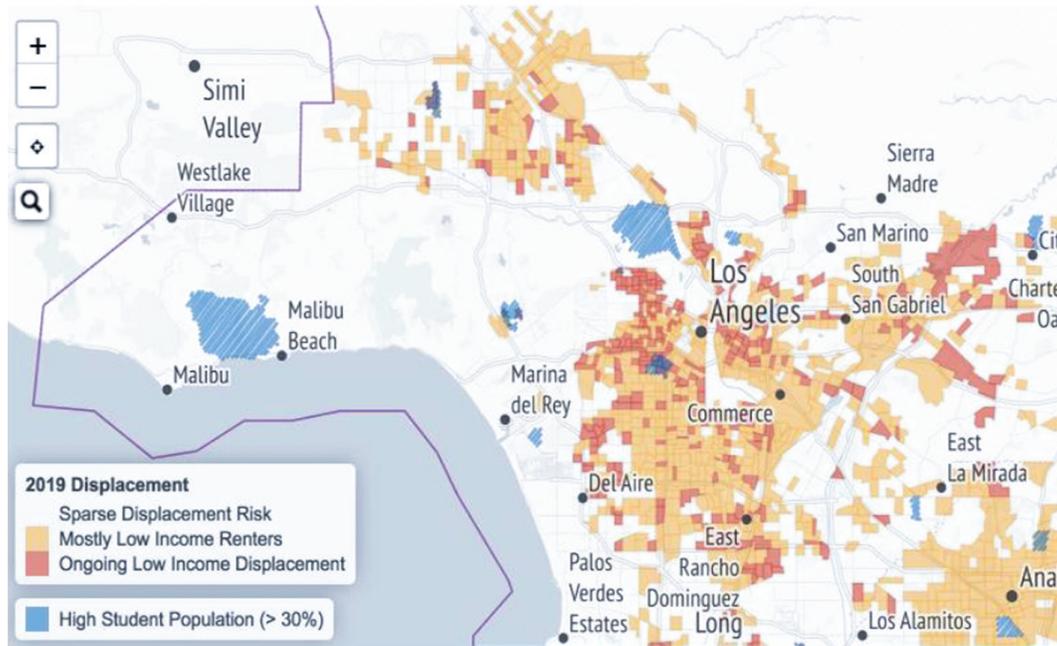


Source: LAHD

Neighborhood Level Displacement Trends

The previous data looked at displacement data at an individual household level, however, displacement is often a community-wide phenomenon. In recent years, there have been various attempts to quantify and map community-level displacement risk in the City of Los Angeles. For example, the Urban Displacement Project and researchers at UCLA created an interactive map of displacement risk in 2016, which was updated in 2019. The 2019 data identifies many areas of the city as experiencing ongoing low-income displacement, most of which are primarily Black and/or Latinx neighborhoods. Based on the online map, ongoing displacement appears most concentrated in the more central part of the city including Mid-City, Pico Union, McArthur Park, Rampart Village, Historic Filipinotown, Hollywood, East Hollywood, and Boyle Heights. South LA also shows areas of ongoing displacement, particularly around West Adams, Leimert Park, and Historic South Central. Areas identified as experiencing displacement are more diffused in the Valley and include small sections of Van Nuys, Northridge, North Hills, Sun Valley and Arleta.

Map 1.1.22- Displacement in Greater Los Angeles Area 2019



Source: Urban Displacement Project

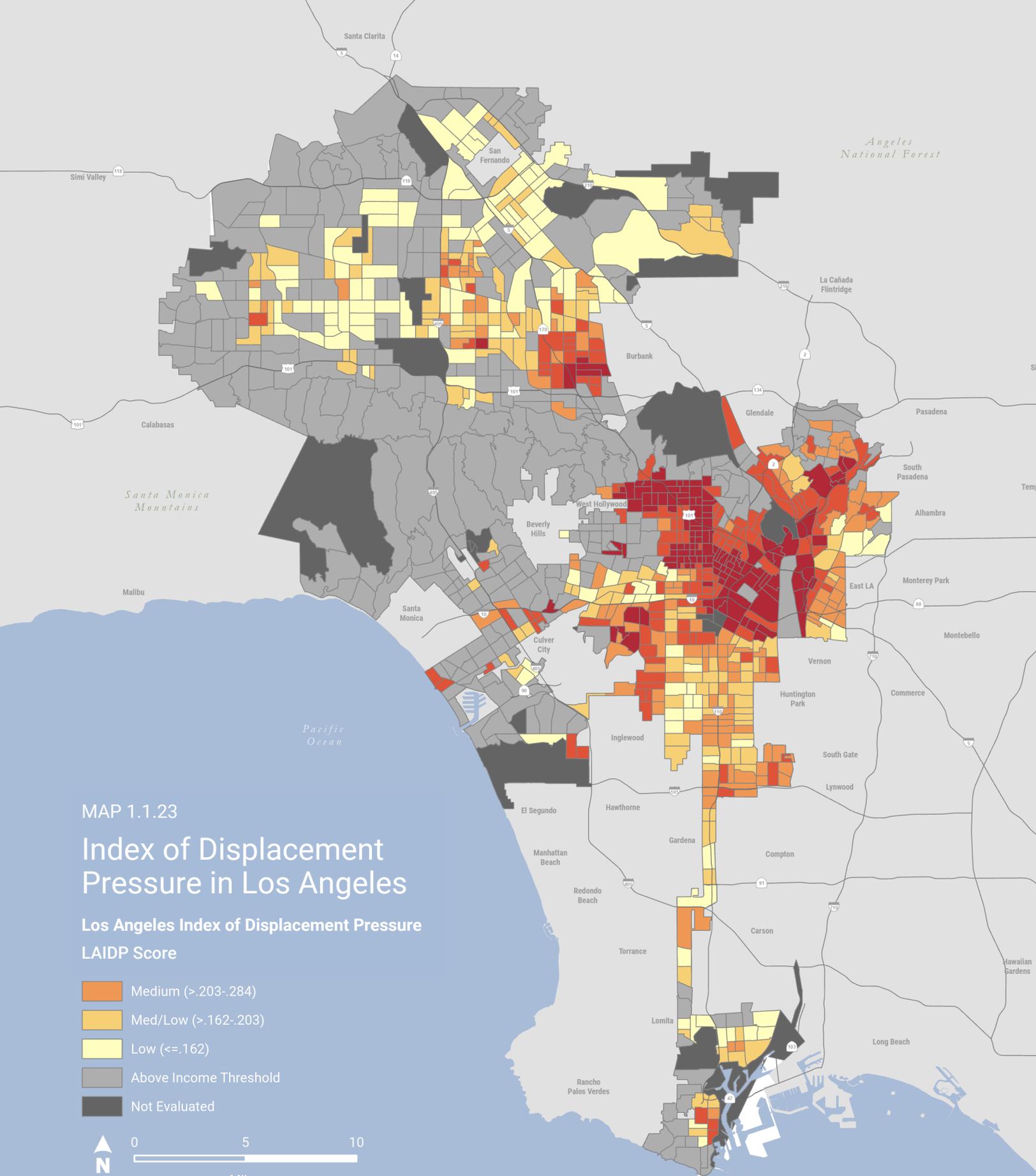
In addition to this tool, LAHD has also worked directly with researchers to better evaluate displacement risk for several years. Most recently, Andrew Miller, a Student Professional Worker at LAHD and graduate student in UCLA’s Masters in Urban Planning program, worked with LAHD staff to develop an index that integrates LAHD data with census data to evaluate displacement risk. His analysis overlaid socioeconomic vulnerability, economic opportunity, and displacement “red flags” such as demographic change, changes in rent and home values, units with expiring covenants, and substandard housing conditions. The table below shows the initial results of his analysis.

Table 1.1.9: Neighborhoods with 2+ Tracts with Above Average Vulnerability and Economic Opportunity and at least 4 Displacement "Red Flags"

Neighborhoods	Number of Tracts	Neighborhoods	Number of Tracts
East Hollywood	4	Exposition Park	1
Pico-Union	4	Glassell Park	1
Westlake	3	Harvard Heights	1
Downtown	2	Hollywood	1
Koreatown	2	Jefferson Park	1
Mid-City	2	Lincoln Heights	1
Chinatown	1	North Hollywood	1
Echo Park	1		

Source: "Mapping Vulnerability, Preserving Stability: Designing an Anti-Displacement Tool for HCIDLA" by Andrew Miller, 2020

Lastly, in 2016 the Mayor's Office's Innovation Team developed a Displacement Pressure Index to predict where displacement may occur. The methodology uses a combination of factors such as transportation investment, home price appreciation, percent of rent-burdened households, and deed-restricted affordable units at risk of converting to market rate. Each factor is weighted based on its predictive power and then each neighborhood is given a composite score based on the sum of all weighted factors. The areas identified as highest risk of displacement, which are shown in red on the map, are located in Downtown, Hollywood, Baldwin village and the Crenshaw Corridor, North Hollywood, East and Northeast LA.



As described under Anti-displacement Strategies (Program 122), City Planning and LAHD will be expanding on all of the research efforts described above to develop new mapping tools and studies that integrate more data, engage community residents, and tie the displacement research directly to new or enhanced tenants' rights and land use policies.

Housing Needs Resulting from the COVID-19 Pandemic

Rental Assistance

COVID-19 Emergency Rental Assistance (ERAS) 2020

On July 1, 2020, in response to the coronavirus (COVID-19) pandemic, the City Council approved the COVID-19 Emergency Rental Assistance (ERAS) Program, allocating almost \$104 million in city and federal CARES Act funding. A rent subsidy program was implemented for tenants with household incomes at or below 80% of Area Median Income (AMI) in order to prevent evictions of lower income tenants for nonpayment of rent, while assisting landlords who rely on rents as a primary or sole source of income. Under the federal guidelines, funds were required to be expended by December 30, 2020. The City of Los Angeles' ERAS program was the largest such rental assistance program in the nation and successfully expended all program funds by the December 30, 2020 deadline (CF No. 20-0401).

The 2020 ERAS program provided 49,133 rent subsidies totaling \$98,266,000 to Los Angeles renter households impacted by a loss of income due to the COVID-19 pandemic. Funding was comprised of \$100,598,699 million in CARES Act funding, \$3.1 million from the General Fund and \$291,577 in private donations.

COVID-19 Emergency Rental Assistance (ERAS) 2021

Under the new COVID-19 Relief Package, signed into law on December 27, 2020, the City of Los Angeles received approximately \$118 million in federal Emergency Rental Assistance funds. Under the federal guidelines as revised on February 8, 2021, the city must expend the funds allocated by September 30, 2022. Additionally, the State of California has received \$1.5 billion in federal Emergency Rental Assistance funds, allocated to cities and counties based on population. Approximately \$143 million is reserved for the City of Los Angeles through the state allocation under SB 91. The total funding potentially allocated to the City of Los Angeles through state and federal funding programs is \$259 million. Per SB 91, in order to ensure that the most impacted residents receive rental assistance as soon as possible, 65% of funds must have been expended by June 1, 2021. Approximately between 51% to 67% of tenant applicants in LAHD's survey of the ERAS program participants self-reported owing back rent. Estimates of the average amount of rent owed range from \$4,200 to \$7,000 dollars.

Emergency Rental Assistance Program (ERAP) 2021

LAHD analyzed data from applicants through the first phase of ERAP, which closed on April 30, 2021. Eligible applicants were chosen through a random selection process, if they met criteria of household income at or below 50% AMI and one or more individuals in the household qualified for unemployment benefits or experienced a reduction in household income directly or indirectly due to the COVID-19 pandemic. Over \$486 million was reported in back rent, with the Latinx applicants owing the largest share of back rent at over \$149 million. Considering their smaller share of the applicant pool, white applicants owed over \$137 million in back rent, and Black applicants owed over \$91 million in back rent.

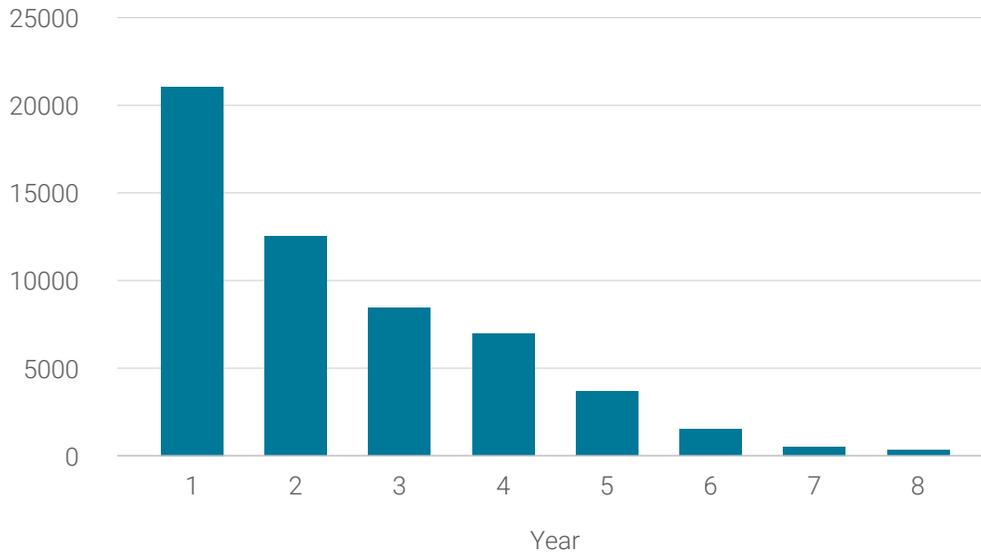
Table 1.1.10: **Back Rent Owed by Race/Ethnicity of ERAP Applicants**

Race/Ethnicity	Back Rent Owed
Latinx	149,767,490.82
white	137,113,703.39
Black	91,045,204.06
Asian	44,050,839.75
Unknown	34,231,957.08
Middle Eastern or North African	26,355,434.26
American Indian	4,014,967.85
Refuse to answer	15,106.75
Total	486,594,703.96

Source: LAHD

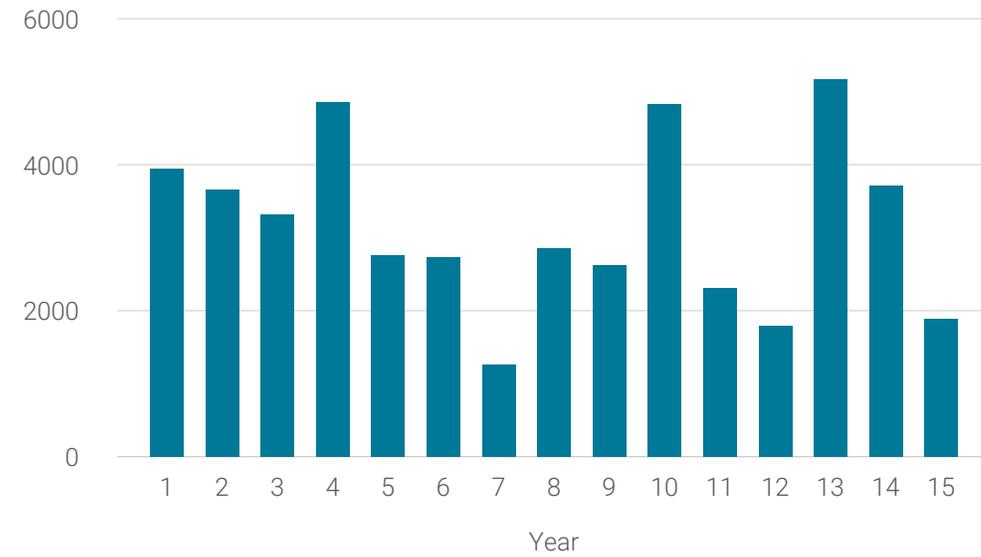
The majority of applicants were in one to two person households, which make up the largest portion of the city's lower income households. Close to a quarter of all applicants had family sizes of 4 or more people. As shown in Chart 1.1.48, the Council Districts with the highest number of applicants were 1, 4, 10 and 13--areas with a disproportionate number of renters.

Chart 1.1.47: ERAP Applicants by Family Size



Source: LAHD

Chart 1.1.48: Total Applicants by Council District



Source: LAHD

In addition to emergency rental assistance, the City, through an infusion of federal and state resources, assisted those most impacted by the economic crisis caused by the pandemic through the Eviction Defense Program (EDP) which provides free pre-eviction counseling, free legal representation and tenant outreach and weekly workshops. EDP assists families who are most at risk of eviction once the eviction protections expire and are experiencing landlord harassment. In addition, non-congregate shelters for the unhoused to minimize exposure and event outbreaks at congregate shelters were also provided through Project Roomkey which secured motels and hotels for vulnerable people experiencing homelessness. The effectiveness of these measures in minimizing the disproportionate impacts faced by Black and Latinx residents during the pandemic, coupled with tenant protections, will be assessed at a later time, as more data becomes available for the 2023–2028 AFH.

Fair Housing Enforcement and Outreach Capacity

Outstanding Fair Housing Issues

As discussed in greater detail in the City of Los Angeles' 2018–2023 AFH (pages 343–344), the city has been subject to various legal and regulatory actions since 2011 regarding accessible housing. In 2019, the City of Los Angeles entered into a Voluntary Compliance Agreement (VCA) with the U.S. Department of Housing and Urban Development (HUD) and its Office of Fair Housing and Equal Opportunity (FHEO) to provide greater access to affordable housing for Angelinos with disabilities through a multi-billion-dollar program. The VCA, which was executed subsequent to the settlement agreement with the Independent Living Center of Southern California, et al., requires the city to produce 4,031 accessible units over a ten-year period from an effective date of August 2, 2019. Of the total accessible units, 3,100 must be through the retrofit of existing developments. For the new construction and substantial alteration of developments, 11% must be mobility units and 4% of the units are for people with hearing or vision impairments.

Under the ten-year VCA the city has agreed to:

- Retrofit hundreds of existing multifamily housing developments across the city to provide 3,100 accessible housing units designed for persons with mobility disabilities, individuals who are deaf or hard of hearing, and individuals who are blind or have low vision, as well as accessible public and common use areas;
- Produce accessible units in new construction and substantial alteration developments at a higher percentage rate than required by State (10% mobility and 4% hearing/vision units) and Federal (5% mobility and 2% hearing/vision units)

minimums, to yield an anticipated 1,500 new accessible housing units over ten years from the effective date of August 2, 2019;

- Implement a new Enhanced Accessibility Program to produce state-of-the-art, “super-accessible” units with features that provide greater accessibility than currently required by Federal standards;
- Implement policies to ensure that accessible units designated for occupancy by individuals with disabilities are actually made available for occupancy by the persons who need the accessibility features they provide; and
- Allocate substantial financial resources to provide the funding necessary to accomplish the actions required by the agreement.

In December 2020, the State’s TCAC regulations increased the minimum accessible units in new construction developments to 15% mobility units and 10% hearing/vision units. To execute the actions required under the VCA, the city has created a new Accessible Housing Program (AcHP) administered by the city’s Housing Department. AcHP is listed as a program in this Housing Element (Program 8) with the objectives of: increasing the supply of accessible units in affordable housing developments; ensuring all affordable housing developments comply with the city’s Fair Housing Policies; conducting trainings on Fair Housing; updating and improving the Grievance tracking system; establishing a live hotline and public counter for assistance in applying for affordable and accessible housing. The city’s commitment to ensuring that people with disabilities have equal opportunity to rent, use, and enjoy housing financed by the city is reflected in Policy 4.1.3 of the Housing Element (see Chapter 6).

Compliance with Existing Fair Housing Laws and Regulations

The City of Los Angeles’ 2018–2023 AFH provides an overview of the state and local fair housing laws and the protected characteristics under each law (see pages 344–346). Since the adoption of the AFH, both the City of Los Angeles and the State of California have passed additional laws to protect against source of income discrimination. In 2019, Senate Bill 329 was signed into law, which prohibits discrimination on the basis of source of income, such as Section 8 vouchers. The City of Los Angeles also adopted Ordinance No.186191 to prohibit discrimination on the basis of using rental assistance and other forms of income to access housing. As a result of these policy changes, households using Housing Choice Vouchers, Rapid Rehousing Vouchers, or other rental assistance should experience fewer barriers to accessing housing throughout the city.

Agencies and Organizations that Provide Fair Housing Resources and Enforcement

The City of Los Angeles relies primarily on a contract with the Housing Rights Center (HRC) to enforce fair housing laws and conduct proactive outreach on fair housing issues. For more information on HRC and the scope of services provided by the organization (see pages 346–352). After the passage of Senate Bill 329 (2019) and local Ordinance No. 186191, effective January 1, 2020, the City of Los Angeles expanded HRC’s contract and provided additional resources to support the agency in monitoring and responding to fair housing complaints based on source of income.

In addition to the HRC, LAHD ensures that housing financed by the city and housing that is subject to an affordability restriction enforced by the city complies with fair housing law. To do so, the department provides training to property managers and requires affordable units to be proactively marketed to potential tenants. The Department’s Accessible Housing Program (AcHP) also requires covered housing developments to adopt and implement the city’s policies and forms related to accessibility and rights for people with disabilities.

Site Inventory

Please refer to Chapter 4 for a discussion of how the sites are identified in a manner that better integrates the community with a consideration for the historical patterns and trends, number of existing households, the magnitude (e.g., number of units) of the RHNA by income group and impacts on patterns of socio-economic and racial concentrations. We also identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which include: Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, we note which fair housing issues the selected contributing factor relates to.

Identification and Prioritization of Contributing Factors

AB 686 requires an identification and prioritization of contributing factors to fair housing issues based on all the previously required analysis (outreach, fair housing assessment, site inventory). This identification and prioritization must give highest priority to factors that limit or deny fair housing choice or access to opportunity or

negatively impact fair housing or civil rights. The following factors were identified in the 2018–2023 AFH that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs and are further expanded for the purposes of the AFFH analysis for the Housing Element. The following factors are listed in order of priority based on an analysis of housing cost burden, housing needs by protected class, displacement risk, and access to opportunity. The analysis also looks particularly at contributing factors for persons with disabilities.

Lack of access to opportunity due to high housing costs

Lack of access to opportunity due to high housing costs is a significant contributing factor to disproportionate housing needs because lack of access to opportunity limits economic mobility that would ameliorate housing cost burden and overcrowding. While affordable housing incentive programs such as the Transit Oriented Communities (TOC) and Density Bonus programs have had success in increasing the production of affordable housing units in market rate development, studying the feasibility of establishing a citywide or geographically specific, on-site affordable housing requirement could allow the city to develop a more nuanced and geographically specific approach to maximizing inclusive affordable development and create a permanent program that can expand on the TOC program incentives. Additionally, TOC (under Measure JJJ) is a voter-approved measure that will expire in 2027 and is only applicable in areas with high quality transit. Studying the feasibility of establishing a citywide or geographically specific affordable housing requirement that complements existing programs will allow the City to develop a more nuanced and geographically specific approach to maximizing inclusive affordable development and create a permanent program that can expand on the TOC production incentives.

Assessing mandatory affordable housing requirements in higher opportunity areas where market-rents are out of reach could open access to ELI households in larger numbers—especially for the disabled community who require housing to meet physical specifications for complete access and enjoyment to their tenancies. The types of housing that are most likely to be accessible to people with disabilities include multi-family housing that is subject to the design and construction requirements of the Fair Housing Amendments Act of 1988, as well as housing that has received Federal financial assistance and is subject to the requirements of Section 504 of the Rehabilitation Act of 1973. These types of housing exhibit patterns of concentration. The areas with the highest concentrations of multi-family housing in the city are Downtown Los Angeles; neighborhoods immediately to the west of Downtown such as Pico-Union, Westlake, and Koreatown, East Hollywood; and areas of the San Fernando Valley. The neighborhoods that are likely to have more accessible and affordable housing tend to have low levels of access to high performing schools, greater exposure to poverty, and reduced environmental health.

Land Use and Zoning Laws

Land use and zoning laws are a significant contributing factor to disproportionate housing needs in the city of Los Angeles and the broader region. Protected classes disproportionately occupy high-density housing, and land with zoning to accommodate this type of housing is not widely available. Considering all land zoned for residential uses, approximately 76% of residential parcels in High and Highest Resource areas are limited to single-family uses and approximately 20% are zoned to allow multi-family housing. In contrast, just 18% of the residentially zoned land in the areas considered High Segregation and High Poverty is allocated to single-family uses, whereas over 80% allows multi-family development. Strategically rezoning portions of High and Highest Resource areas, while ensuring there are affordable housing requirements and protections for existing residents, would contribute to a more balanced and accessible housing stock in those neighborhoods and would create opportunities to foster integration within those neighborhoods, which are predominantly white and are least likely to have restricted, publicly funded affordable and accessible housing for persons with disabilities.

For purposes of the Housing Element's Inventory of Adequate Sites for Housing (Chapter 4), as advised by HCD, sites identified to accommodate the lower-income portion of the RHNA are to not be concentrated in low-resource areas (lack of access to high performing schools, distant from job centers, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing so that people feel that they have a choice about where they want to live and they are not categorized for a specific neighborhood. This approach is reflected in the Rezoning Program, as discussed in Chapter 4 and Program 121 in Chapter 6. Increased integration would be particularly likely to result if affordable housing is provided on-site at new multi-family developments in these neighborhoods. Incentive programs such as Density Bonus, TOC, Expedited Permitting and revisions to the zoning code through Re:code LA are all opportunities to foster the development of affordable housing in High Opportunity areas.

Availability of Affordable and Accessible Units in a Range of Sizes

The availability, or lack thereof, of affordable housing in a range of family sizes is a significant factor to housing burden and overcrowding among Black and Latinx households, and large families with children in the city. More than one in four Latinx households is overcrowded, and the rate of overcrowding for Latinx households is seven and a half times greater than that of White households and five times the rate of Black households. The shortage of affordable housing in Los Angeles is particularly acute for people with disabilities. A significant portion of the affordable, accessible housing in the city consists of Single-Room Occupancy (SRO) units and one-bedroom and studio units in more integrated developments with a permanent supportive housing component. These units meet critical needs, but are not adequately sized and as such do not provide access to affordable housing for families including people with disabilities or for people with disabilities who need the services of a live-in aide to allow

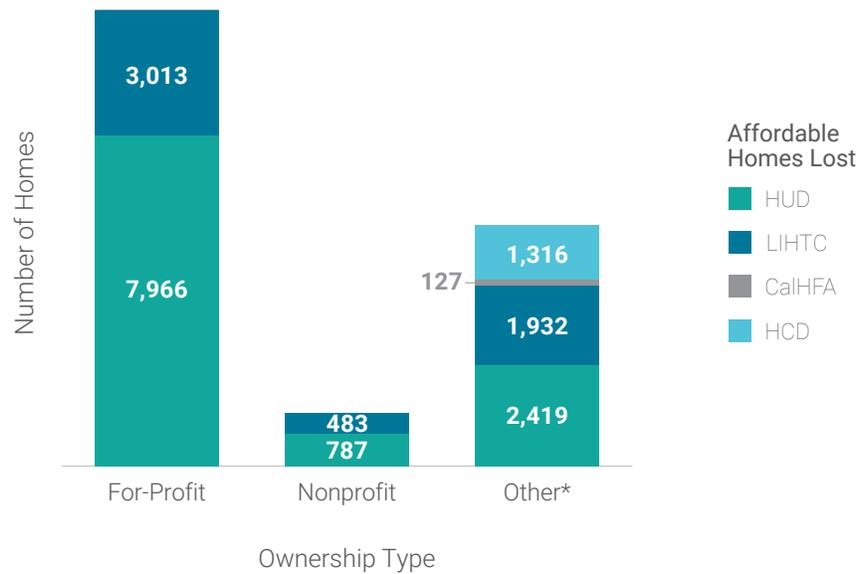
persons to live independently in non-institutional settings. As stated in Chapter 2, Federal and State laws have been enacted which require updating local regulations to ensure that no city procedures or development standards pose obstacles to the production or preservation of housing for people with disabilities. This includes a variety of housing types, treatment facilities, community facilities, and short- and long-term housing. The settlement agreement in *Independent Living Center of Southern California, et. al v. City of Los Angeles* resulted in the creation of the Accessible Housing Program (AHP) to carry out the obligations under the Corrected Settlement Agreement. The Settlement Agreement requires the city to produce 4,031 accessible units through new construction, substantial rehabilitation or retrofit of existing developments over a ten year period from the effective date of September 6, 2016. For units produced through new construction and substantial rehabilitation, 10% must be mobility units and 4% must be hearing/vision units.

Loss of Affordable Housing

Loss of affordable housing is a significant contributing factor to disproportionate housing needs and, in particular, housing cost burden continues to be a major issue facing Black and Latinx households. More than one in four Latinx households is overcrowded, and the rate of overcrowding for Latinx households is seven and a half times greater than that of white households and five times the rate of Black households. According to a 2021 California Housing Partnership report assessing the loss and conversion risk of federally- and state-subsidized affordable housing, Los Angeles County has the largest share of at-risk homes at 34% or 10,171 units due to expiring covenants in the next ten years. Overall, Los Angeles County has lost 6,156 of covenanted units between 1997 and 2020.²⁶ Units identified to be most at-risk of converting to market-rate housing are properties with affordability covenants expiring in one to five years, have no overlapping subsidies that extend affordability, and the property is not owned by a stable mission-driven non-profit developer. With additional resources from the Affordable Housing Linkage Fee and SB 2 PLHA grant, LAHD will be able to revise its program guidelines for a more robust Preservation program prioritizing the most at-risk units.

26. California Housing Partnership, "Affordable Homes at Risk," February 2021; <https://1p08d91kd0c03rlxhmhtydrp-wpengine.netdna-ssl.com/wp-content/uploads/2021/02/Affordable-Homes-At-Risk-Report-2021.pdf>

Chart 1.1.49: **Figure 2. Loss of Affordable Rental Homes by Ownership Type, 1997–2020**



Source: California Housing Partnership Preservation Database, January 2021.

Other includes homes owned by limited dividend organizations, other ownership structures, or ownership is unknown.

Due to the ongoing expiration of affordable housing units, there has been increasing interest in the creation of social housing programs. For the purposes of this Housing Element, social housing is defined as housing that is:

1. Decommодified, meaning it is either publicly or cooperatively owned, or owned by a qualified community-based nonprofit with a mission to provide social housing and forever protected from transfer to private, for-profit ownership.
2. Available at affordable cost to residents of all income levels, from the very lowest to those of moderate incomes.
3. Permanently affordable with no expiration dates
4. Inclusively governed by providing its residents with the right to participate democratically in its operation and management, and protections from arbitrary eviction.

Opportunities to explore and increase social housing can be found in Programs 12 (International Building Exhibition (IBA) for Los Angeles) and 121 (RHNA Rezoning).

Tenant Protection

Evictions or the threat of eviction causes severe housing instability for thousands of Los Angeles tenants each year, often resulting in displacement or homelessness. Prior to the COVID-19 pandemic, approximately 60,000 evictions were filed annually countywide. Of this number, an estimated 30,000 were filed in the city of Los Angeles. Early negotiations between landlords and tenants in units subject to the city's Rent Stabilization Ordinance (RSO) can help resolve eviction-related issues before an unlawful detainer is issued. This kind of early intervention, particularly if it is combined with flexible rental assistance, provides a faster and less costly response for tenants and landlords. More than 620,000 of the city's 800,000 multifamily rental units are covered by the RSO. The adoption of AB 1482, effective January 1, 2020, provides some rent stability for units not covered by the RSO by prohibiting landlords from increasing rents beyond five percent plus inflation annually. In addition, the new law's strong renter protections that extend Just Cause protections to tenants that have lived in their units for at least one year will be integrated into the city's Eviction Defense Program, also known as Stay Housed LA. This program consists of a partnership between Los Angeles County, the City of Los Angeles, local community, and legal service providers who assist tenants in understanding their rights and responsibilities as renters and provide legal assistance to ensure residents can remain in their homes.

Violations of the RSO are also a significant contributing factor to disproportionate housing needs. For the 2018–2023 AFH, LAHD analyzed RSO cases by Council District in 2017. This data is consistent with the possibility of racial, ethnic, and national origin disparities in the incidence of violations of the RSO. The Valley and West districts, which have higher concentrations of white residents, have by far the lowest rates of open cases. The East, South, and Wilshire districts, which have a larger concentration of residents of color, have much higher rates of open cases. The especially high rate of open cases in the Wilshire district may reflect higher concentrations of rental housing than in East and South LA along with greater gentrification pressures that incentivize landlords to break the law. Additionally, between 2014 and 2020, there was nearly a 40% increase in the number of RSO open cases. The city's recently adopted Tenant Anti-Harassment Ordinance provides additional protections for tenants experiencing unlawful harassment, and landlords may be fined up to \$5,000 if the tenant is older than 65 years or is living with a disability.

Housing Discrimination

Residents that fall into protected classes face disproportionate housing needs due to housing discrimination. The City of Los Angeles relies primarily on a contract with the Housing Rights Center (HRC) to enforce fair housing laws and conduct proactive outreach on fair housing issues. Between 2013–2019, HRC reported over 5,200 fair housing complaints, with close to 80% involving discrimination on the basis of a physical disability, 12% on family status, and 8% on the basis of race. In 2019, the City of Los Angeles entered into a Voluntary Compliance Agreement (VCA) with the U.S. Department of Housing and Urban Development (HUD) and its Office of Fair Housing and Equal Opportunity (FHEO) to provide greater access to affordable housing for

Angelinos with disabilities through a multi-billion-dollar program. The VCA, which was executed subsequent to the settlement agreement with the Independent Living Center of Southern California, et al. , requires the city to produce 4,031 accessible units over a ten-year period from an effective date of August 2, 2019. Of the total accessible units, 3,100 must be through the retrofit of existing developments. For the new construction and substantial alteration of developments, 11% must be mobility units and 4% are to be for hearing/vision units.

Violations of the Rent Stabilization Ordinance

Violations of the Rent Stabilization Ordinance are a significant contributing factor to disproportionate housing needs. LAHD’s Regulatory Compliance and Code Bureau enforces the city’s Rent Stabilization Ordinance (RSO), which prevents landlords from raising rents excessively or unlawfully terminating tenancies to raise rent to market levels upon vacancy. Violations of the RSO can increase housing cost burden and threaten housing stability.

For the 2018–2023 Assessment of Fair Housing (AFH), LAHD analyzed RSO cases by district in 2017. This data revealed a corresponding relationship between racial concentrations and the incidence of RSO violations. The Valley and West districts, which have higher concentrations of white residents, have by far the lowest rates of open cases. The East, South, and Wilshire districts, which have a larger concentration of residents of color, have much higher rates of open cases. The especially high rate of open cases in the Wilshire district may reflect higher concentrations of rental housing than in East and South LA along with greater gentrification pressures that incentivize landlords to break the law. Additionally, between 2014 and 2020, there was nearly a 40% increase in the number of RSO open cases, illustrating the need for additional resources to monitor and enforce existing tenants’ rights laws.

Table 1.1.11: Rent Stabilization Open Cases by District, April 2017

District	Total Population	Total Open Cases	Open Cases per 100,000 People
East	393,645	224	56.9
South	928,516	715	77.0
Wilshire	656,340	583	88.8
Valley	1,462,262	367	25.1
West	421,445	121	28.7

Source: LAHD

Displacement of Residents Due to Economic Pressures

Displacement of residents due to economic pressures is a significant factor to disproportionate housing needs in the City of Los Angeles, and across Southern California. Loss of affordable housing is a significant contributing factor resulting in displacement of residents and, in particular, housing cost burden continues to be a major issue facing Black and Latinx households. Overall, Los Angeles County has lost 6,156 of covenanted affordable units between 1997 and 2020. The city currently has 9,412 housing units at risk of losing their affordability use restrictions between October 1, 2021 and September 30, 2031. Dedicated funding from state and federal funding sources for preserving expiring affordable housing will prove necessary to maintain housing stability for low income residents.

Moreover, unless steps are taken to mitigate the effects of development on low-income BIPOC renters, the city's development policies could have unintended consequences. The continued expansion of LA Metro's transit system with upcoming openings of the Crenshaw/LAX Line, Regional Connector, and construction of the Purple Line to the Westside has increased opportunities for housing development along these transit corridors. If new development is going to further the goals of fair housing and desegregation, measures must be taken to ensure that new development is both available to members of protected classes and benefits are spread widely throughout the city. The city will need to continue to take proactive steps to protect more vulnerable renters, such as ongoing enforcement of the RSO, a robust Eviction Defense Program, and stricter enforcement of Ellis Act provisions to ensure that any new development does not substantially reduce the stock of affordable housing, and additional resources to preserve affordable housing.

Lack of Private Investment in Specific Neighborhoods

The lack of private investments in specific neighborhoods is a significant contributing factor to disproportionate housing needs in the City of Los Angeles and the broader region. Specific neighborhoods with low-income, predominantly people of color populations have the greatest need for private investments to construct or rehabilitate housing, investment in new small businesses, and increased access to community amenities, such as supermarkets, pharmacies, and banks. When assessing the various metrics that reflect lack of private investment in specific neighborhoods, it is predominantly low-income, and predominantly communities of color, that suffer the greatest consequences and are often left without an opportunity for economic mobility.

Lack of affordable in-home or community-based supportive services is a significant contributing factor to segregation for people with disabilities in Los Angeles. For example, of those experiencing homelessness, 29% have serious mental illness, 22% have physical disability, and 13% have a developmental disability. Permanent supportive housing units are also highly concentrated in Skid Row and in neighborhoods near Downtown that include R/ECAPs and offer limited access to opportunity for residents, especially for persons with disabilities. Clearly, there is an unmet need for affordable, integrated housing for individuals who need supportive services.

Greater economic mobility and access to inclusive community amenities for protected class members would reduce rent burden. Generally, the distribution of community problems such as the lack of adequate housing, the lack of high-quality education, the lack of investments in small businesses, and the lack of access to community amenities, impedes economic mobility for low-income people of color and prevents them from accessing high opportunity areas, thus perpetuating patterns of segregation.

Lack of Public Investment in Specific Neighborhoods, Including Services and Amenities

A lack of public investment is a significant contributing factor to disproportionate housing needs in the City of Los Angeles and the broader region. Because high-poverty, racially or ethnically concentrated neighborhoods are in greatest need of improved infrastructure and services, residents of such neighborhoods disproportionately suffer from problems such as unpaved streets, low-performing schools, and faulty sidewalks – markers that can serve as metrics indicating inequitable public investment. Generally, the distribution of these types of community problems corresponds to the distribution of R/ECAPs throughout the city. One metric for public investment is the condition of paved streets. In Watts, which ranks among the lowest in income and population of white residents in the city, there is a concentration of paved streets that are in poor condition. Similar conditions exist in Westlake, another area with disproportionately high percentages of Latinx and Asian populations. The distribution of low-performing schools also roughly coincides with the geographic spread of R/ECAPs. South Los Angeles has some of the highest concentration of schools ranked among the state's lowest 5%.²⁷

Other Contributing Factors for Persons with Disabilities

Regulatory Barriers to Providing Housing and Supportive Services for People with Disabilities

Regulatory barriers to providing housing and supportive services for people with disabilities are a significant contributing factor to the segregation of people with disabilities. The primary regulatory barrier to providing housing and supportive services for people appears to be the inadequacy of the rates that Medi-Cal service providers are allowed to bill the state.

The Independent Living Center of Southern California challenged those rates in a lawsuit that ultimately went all of the way to the U.S. Supreme Court in 2012. The Court ultimately did not address whether Medi-Cal's rates were adequate, and, in a subsequent decision, the Supreme Court limited the ability of private plaintiffs to challenge Medicaid rates in the courts. Accordingly, in some instances, Medi-Cal rates may not be adequate

27. Resmovits, Joy, Priya Krishnakumar, Ben Walsh "California must find and fix its worst public schools. Here's one way to start," Los Angeles Times, September 28, 2017; <https://www.latimes.com/projects/la-me-edu-test-scores-2017-bottom-five/>

to ensure that people with disabilities have access to the breadth of services that would enable them to live in the most integrative setting consistent with their needs. Inadequate rates may not only make the difference between an individual residing in an institution or in the community, they may make the difference between living in a group home and in their own home. If costs like travel time are not adequately compensated for providers, then providers may concentrate their activities around group homes in order to minimize undercompensated time.²⁸ Moreover, currently Medi-Cal eligibility criteria through April 31, 2022 will make services limited for adults over 50 with disabilities who are also undocumented.

Lack of Affordable In-Home or Community-Based Services

Lack of affordable in-home or community-based supportive services is a significant contributing factor to segregation for people with disabilities in Los Angeles. Through Medi-Cal and the California Department of Developmental Services, California offers an array of waivers and other funding mechanisms to pay for in-home or community-based services for people with disabilities. In addition to the two programs mentioned, the Department of Social Services' In Home Supportive Services (IHSS) program allows for persons with disabilities to have a paid caregiver that assists with daily needs and remain at home. Approximately 7% of participants are under 18, 37% between the ages of 18-54, 19% between the ages of 65-74, 22% between the ages of 75-84 and 15% over the age of 85. Approximately 60% of all persons enrolled have disabilities, and 2% specifically are vision impaired.²⁹ One of the key eligibility criteria is having a Medi-Cal eligibility determination, which is based on economic hardship and immigration status. Current eligibility requirements are potentially leaving undocumented individuals with disabilities behind. With AB 133, the health care budget trailer bill, access to Medi-Cal will be expanded to low-income adults 50 years of age or older, regardless of immigration status starting in May 2022.

Lack of Affordable, Integrated Housing for Individuals who need Supportive Services

Lack of affordable, integrated housing for individuals who need supportive services is a significant contributing factor to segregation and disproportionate housing needs, particularly with respect to cost burden to live in the city. Both the Housing Authority of the City of Los Angeles (HACLA) and City of Los Angeles provide significant support for Housing First programs that do not condition occupancy on compliance with substance abuse or mental health treatment regimens. Housing First is an evidence-based practice for addressing chronic homelessness and an important strategy for increasing access to affordable, integrated housing for individuals who need supportive services. People with psychiatric and substance abuse disabilities and people with intellectual and developmental disabilities are among those who are most likely to need supportive services.

28. Pacific Shores Properties, LLC v. City of Newport Beach, 730 F.3d 1142 (9th Cir. 2013).

29. CA Department of Social Services, "Release of In-Home Supportive Services (IHSS) Consumer Characteristics Report," April 8, 2019; https://www.cdss.ca.gov/portals/9/acin/2019/i-22_19_es.pdf

The programs that are currently operating in the city primarily address the needs of the former groups for affordable, integrated housing but not those of the latter. Additionally, as evidenced by the allocation of Mental Health Services Act housing program funds, many developments, typically run by non-profit organizations that provide permanent supportive housing to people with disabilities, are entirely comprised of units for special needs populations. Although housing in such buildings is more integrated than nursing homes and group homes, a decentralized model of providing assistance through tenant-based rental assistance or by setting aside 10% to 25% of units in a development for people with disabilities is more consistent with the community integration mandate of the Americans with Disabilities Act. Permanent supportive housing units are also highly concentrated in Skid Row and in neighborhoods near Downtown that include R/ECAPs and offer limited access to opportunity for residents. Lastly, although HACLA and the city have made impressive strides in implementing Housing First programs, as of the 2020 Greater Los Angeles Homeless Count, there are over 41,000 residents experiencing homelessness in the city. Of those experiencing homelessness, 29% have serious mental illness, 22% have physical disability, and 13% have a developmental disability. Clearly, there is an unmet need for affordable, integrated housing for individuals who need supportive services. Expanding target populations to include people with intellectual and developmental disabilities, prioritizing developments where no more than 25% of units are set aside for people with disabilities, and scattering units across a broader range of neighborhoods would help ensure that HACLA and the city effectively address fair housing issues as they bring their efforts to scale.

Lack of Assistance for Transitioning from Institutional Settings to Integrated, Independent Living

Lack of assistance for transitioning from institutional settings to integrated settings is a significant contributing factor to the segregation of people with disabilities in Los Angeles. Since 2007, the California Department of Health Care Services has operated its California Community Transitions project, which is designed to assist Medi-Cal beneficiaries who are long-term residents of state-licensed health care facilities shift to home and community-based settings. The program is a Medicaid demonstration program and services as available through December 31, 2021. The program funds costs like household set-up costs, home modifications, vehicle adaptations, and assistive devices that may not be covered by housing subsidies or other Medicaid funding streams. Non-profit organizations including the Independent Living Center of Southern California, Southern California Resource Services for Independent Living, Communities Actively Living Independent & Free, and the Westside Independent Living provide services to individuals who are transitioning to home and community-based settings. Due to the COVID-19 pandemic, the Centers for Medicare & Medicaid Services (CMS) granted the State approval to implement temporary measures to protect the health and safety of participants.³⁰

30. <https://www.dhcs.ca.gov/services/ltc/Documents/MFP-CCT-flexibilities.pdf>

Additionally, the regional centers serving Los Angeles City provide services that aid people with developmental disabilities in transitioning from institutional settings. At this juncture, robust data on the adequacy of existing efforts to provide assistance for transitioning from institutional settings to integrated housing is not available. Preliminarily, it appears likely that the correct pieces are in place to facilitate transitions, but the scale of those efforts may need to be expanded. The city looks forward to future data for the purposes of the 2023–2028 Assessment of Fair Housing.

Lack of Local or Regional Cooperation

A lack of local or regional cooperation is a contributing factor to segregation for people with disabilities in the city and the region as a whole. The infrastructure that exists to facilitate regional cooperation through the Southern California Association of Governments (SCAG) and the Los Angeles Homeless Services Authority (LAHSA) may not be as focused on the implementation of the ADA’s community integration mandate as they are on large scale transportation and land use planning needs and outside of the homeless services context. There is an unmet need for greater coordination between agencies, such as the regional centers and county mental health departments that administer Medicaid-funded supportive services, service providers, and affordable housing stakeholders to ensure that people with disabilities who are not homeless or at risk of homelessness are able to live in the most integrated setting appropriate to their needs and consistent with their informed choice.

Contributing Factors of Publicly-Supported Housing Location and Occupancy

The 2018–2023 AFH outlines contributing factors affecting the location and occupancy of publicly funded housing. Chapter 2 (Constraints On Housing Maintenance, Improvement, and Development) outlines constraints and factors alleviating the siting of affordable housing. Additional analysis will be included in the upcoming 2023–2028 AFH.

Fostering Inclusive Public Engagement

In Los Angeles, like many cities, renters, unhoused residents, youth, and residents in lower-income areas have far lower rates of participation in long-term planning processes like the Housing Element. The lack of diverse voices in the planning process has historically resulted in an imbalance of single-family zoning in high resource areas and a disproportionate share of multifamily and affordable housing development located in High Segregation and High Poverty areas. In order to effectively affirmatively further fair housing and effectively reach communities in a culturally-appropriate, language-inclusive manner, the city utilized Local Early Action Planning (LEAP) grant funding to support outreach across many housing efforts including the Housing

Element Update and other strategies initiated by the City of Los Angeles to accelerate housing production and promote equity-based models for increasing affordable housing development.

In August 2021, Liberty Hill Foundation served as a consultant to the City to conduct focus groups across four different communities in the city to gather feedback on the Draft Housing Element Plan released in July 2021. Participants were majority renters who reside in the communities of South LA, Pico Union, Westlake, Boyle Heights, Skid Row/Downtown, East Hollywood and North Hollywood. The majority of participants were Latinx residents across all four focus groups, renters living in RSO units, and experiencing housing instability or homelessness due to low wages or loss of income. One focus group had 30% of participants identify as Black/African American, another focus group had 27% of participants identify as LGBTQ.

The curriculum, based on the Draft Housing Element, was developed for the program and organizations leading each focus group were encouraged to tailor the presentations to respond to the socioeconomic and geographic context for each neighborhood. A report produced by Liberty Hill Foundation, in partnership with Strategic Actions for a Just Economy (SAJE), Coalition for Economic Survival (CES), Eastside Leads, and Los Angeles Community Action Network (LA CAN) can be found in Appendix 0.1.

Recommendations

The recommendations, based on comments provided by residents across all focus groups are the following:

Recommendation #1: Tailor housing to the needs of extremely low income and very low income tenants that are most vulnerable to homelessness.

As indicated in the RHNA, the city will need to accommodate the construction of 115,978 very low-income and extremely low-income housing units combined. Based on the feedback from the focus groups, residents commented on the need to prioritize housing goals for extremely low-income and very low-income renters, including innovative programs such as Small Lot Subdivisions, and building housing in High Resource areas to level the playing field for tenants and families and combat historical inequalities.

Recommendation #2: Prevent displacement by continuing to pass and implement a range of tenant protections to keep tenants housed while supporting community-led housing solutions like Community Land Trusts to build long-term housing stability.

One of the Citywide Housing Priorities mentioned in Chapter 6 of the Housing Element is “Preventing Displacement.” Focus group participants identified this as critically important to stave off evictions after the COVID-19 eviction protections expire. In order to meet this goal, participants recommended that the Housing Element include support for increased tenant protections and continued implementation of existing tenant protections, like the recently adopted Tenant Anti-Harassment Ordinance. Based on the

focus groups, there is also a need for long-term housing stability in the neighborhoods most at risk of displacement. Community Land Trusts allow the community to maintain ownership of land and keep any housing built on it affordable for many generations to come. One possible way to do this is by incorporating a Community Land Trust model that supports homeowners and facilitates resales to future low- and moderate-income families.

Recommendation #3: Increase quality of life in low-income communities by planning for more green space, public transit, and other amenities.

There is a lack of green space in historically disadvantaged neighborhoods, especially when compared to more affluent areas of Los Angeles. This theme was repeated across the focus groups, especially from those tenants with families. The recommendation was to ensure that new developments, especially those with low-income units, have easy access to green space. Tenants also mentioned several other community amenities they feel are lacking in their communities, including good schools, access to public transit, etc. Access to good schools and other quality of life improvements can be produced by spreading affordable housing across the city.

Overall, participants expressed a desire to have affordable housing reach all areas of the city to avoid overconcentration in low-income, segregated communities and expand housing access in High Resource, opportunity rich areas. A language-inclusive and community-led process, where organizations with deep ties in BIPOC communities in the city are imperative to capturing the voices and feedback from residents that would otherwise not participate in the Draft Housing Element process.

Goals and Actions

Select programs identified in Chapter 6 intended to promote the city's goals of affirmatively furthering fair housing are identified below for prioritized contributing factors. Specific actions are either ongoing activities or will be undertaken by LAHD and/or LACP as part of actions to address AFFH issue areas in partnership with key local stakeholders. See Program 124.



Conclusion

More than four decades after Congress passed the Fair Housing Act, fair housing issues remain critical to the pursuit of strong, sustainable, inclusive communities and equal opportunity for all residents. Racial segregation in housing has not only endured, but along with increasing income segregation, has also created areas of concentrated poverty populated predominantly by people of color. Residential segregation carries high costs for individuals, families, and society as a whole, constricting opportunity and life chances and limiting economic growth. These impacts have disproportionate consequences for Black and Latinx residents, low-income families, as well as persons with disabilities. The City of Los Angeles aims to increase access to opportunity for all residents by reforming land use policies, prioritizing housing production, especially affordable housing, promoting housing stability for all residents, especially renters, and correcting the harms of explicit and implicit forms of discrimination in housing choice by prioritizing development in high opportunity, high resource areas. Housing production that proactively desegregates parts of the city must be balanced with the significant needs and challenges faced by residents that are part of protected classes residing in distressed, low resource areas and R/ECAPs. This can be accomplished by setting priorities that expressly alleviate the disproportionate factors that negatively impact the quality of life for residents of color in the city through prioritizing more resources and investments in these areas.