



Analysis of Impediments to Fair Housing 2015 Carson, California

City of Carson

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SECTION I: Introduction, Methodology and Background

Fair Housing is the right of individuals to obtain the housing of their choice, free from discrimination based on race, color, religion, sex, disability, familial status, or national origin. This right is assured by the Federal Fair Housing Acts of 1968 and 1988, as amended, which make it unlawful to discriminate in the sale, rental, financing, and insuring of housing.

Under the Fair Housing Act an aggrieved person may, not later than one year after an alleged discriminatory housing practice has occurred, file a complaint directly with the United States Department of Housing and Urban Development (HUD), or a State or local agency enforcing laws that are “substantially equivalent” to the Fair Housing Act. Upon the filing of such a complaint, HUD has the responsibility to serve notice of the complaint and conduct an investigation into the alleged discriminatory housing practice.

In order to ensure the prevention and elimination of housing discrimination, HUD requires all governing authorities directly receiving Consolidated Plan Program funds to certify that the community, consortium or state will “affirmatively further Fair Housing” within their jurisdictions. This requirement is codified in the Consolidated Plan requirements under 24 CFR 91.225. Public agency obligations under the Act may be grouped into three categories:

Intent: The obligation to avoid policies, customs, practices, or processes whose intent or purpose is to impede, infringe, or deny the exercise of fair housing rights by persons protected under the Act.

Effect: The obligation to avoid policies, customs, practices, or processes whose effect or impact is to impede, infringe, or deny the exercise of Fair Housing rights by persons protected under the Act.

Affirmative Duties: The Act imposes a fiduciary responsibility upon public agencies to anticipate policies, customs, practices, or processes that previously, currently, or may potentially impede, infringe, or deny the exercise of Fair Housing rights by persons protected under the Act.

The first two obligations pertain to public agency operations and administration, including those of employees and agents, while the third obligation extends to private as well as public sector activity.

The City of Carson (“the City”) 2015 Analysis of Impediments discusses the results of earlier analyses of impediments and the steps the City intends to take to implement policies that will prevent and eliminate housing discrimination in the City.

The City is transitioning from the Analysis of Impediments format to the Assessment of Fair Housing format during the period 2015 to 2019. The 2015 Analysis of Impediments incorporates elements of the Assessment of Fair Housing format.

LEGAL BASIS

The federal Fair Housing Act of 1968 and the Fair Housing Amendments Act of 1988 (42 U.S. Code §§ 3601-3619, 3631) are federal fair housing laws that prohibit discrimination in all aspects of housing, such as the sale, rental, lease, or negotiation for real property. The Fair Housing Act prohibits discrimination based on race, color, religion, sex, and national origin.

In 1988, the Fair Housing Act was amended to extend protection to familial status and people with disabilities (mental or physical). In addition, the Amendments Act provides for “reasonable accommodations,” allowing structural modifications for persons with disabilities, if requested, at their own expense, for multi-family dwellings to accommodate the physically disabled.

The California Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The Fair Employment and Housing Act (FEHA; Part 2.8 of the California Government Code, Sections 12900-12996) prohibits discrimination and harassment in housing practices.

The Unruh Act (California Government Code Section 51) protects Californians from discrimination in public accommodations and requires equal access to the accommodations. The Unruh Act provides broad protection and has been held by the courts to prohibit any arbitrary discrimination on the basis of personal characteristics or traits, and applies to a range of types of housing.

The Ralph Civil Rights Act (California Civil Code Section 51.7) prohibits violence and threats of violence and specifies that housing situations are protected under this Act, including houses, apartments, hotels, boarding housing, and condominiums. Violators of the Ralph Act can be sued for actual or emotional damages, in addition to civil penalties.

The Bane Civil Rights Act (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual’s constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes. However, convictions under the Act are not allowed for speech alone unless that speech itself threatened violence.

In addition to these Acts, California Government Code Sections 111135, 65008 and 65589.5 prohibit discrimination in programs funded by the state and in any land-use decisions.¹

METHODOLOGY

The Analysis of Impediments (AI) conducted by the Community Development Services team involved a variety of data collection and analysis techniques, including:

1. Analyzing demographic data available through the U. S. Census Bureau, as well as descriptive data pertaining to the city housing market and trends in real estate over the past ten years.
2. Examination of mortgage lending trends through the analysis of data available through the Home Mortgage Disclosure Act (HMDA). Enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C, HMDA requires lending institutions to report public loan data. Using the loan data submitted by these financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate and disclosure reports for each metropolitan area (MA) that are available to the public at central data depositories located in each MA.
3. A stakeholder survey.
4. Interviews and/or focus groups with local government staff, community representatives, and targeted populations.
5. A review of source documents, including the most recent AI, conducted in 2010, past AIs completed in 1997 (*note: while previously identified as a 1997 report, when a copy of it was obtained, it was discovered that it was dated October, 1996*) and 2003, a test and survey completed in 1999, the 2015-2020 Consolidated Plan, and the most recent CAPERs.

¹Fair Housing Hotline Project, Legal Services of Northern California - March 2004. "Fair Housing in California: Families with Children: A Manual for Housing Providers, Tenants and Advocates"

BACKGROUND: THE CITY OF CARSON

1997 Analysis of Impediments to Fair Housing

(As noted, though this document had been previously identified as a 1997 report, when a copy of it was obtained, it was discovered that it was dated October, 1996. However, to avoid confusing the reader, Impediments cited there will in this report be referred to as the “1997 Impediments.”) The following were the Impediments to Fair Housing identified at that time:

Impediment #1: High level of segregation of Blacks in the northern part of the city. There is a variety of direct and indirect evidence that suggests that Blacks do not get the same opportunities to purchase homes in parts of Carson as other prospective purchasers enjoy, and other racial groups are often not shown housing in the predominantly Black portions of Carson.

Impediment #2: Limited number of lending opportunities for minorities as opposed to Whites in the City.

Impediment #3: Illegal practices by real estate industry personnel with respect to Hispanics.

The following were the proposed strategies for each of the 1997 Impediments identified:

Impediment #1:

1. Develop a regional strategy on real estate steering issues and a capacity for testing in the homeowner market.
2. Use full-application testing more widely to prove and measure discrimination.
3. Develop litigation-related activities.
4. Re-examine outreach activities.

Impediment #2

1. Follow up on the 1978 study pattern of lending patterns.

Impediment #3

1. Investigate the activities of unlicensed brokers and unauthorized practices that are targeted at Hispanic homebuyers.
2. Conduct functional cost analysis of specific functions and set priorities.

-
3. Improve monitoring methods.

The following are the **City's activities** toward meeting the strategies contained in the 1997 AI.

Impediment #1:

- 1. Develop a regional strategy on real estate steering issues:** No progress was made by the City during the reporting period. The impediment is carried forward to the 2003 AI.
And (also develop) a capacity for testing in the homeowner market: In 1999 the City hired the Fair Housing Institute to conduct a series of fair housing surveys and to complete market tests for the homeowner market. The first survey and testing were completed in June 1999, increasing the City's capacity for testing in the homeowner and rental market.
- 2. Use full-application testing more widely to prove and measure discrimination:** In 1999 the City hired the Fair Housing Institute ("the Institute") to complete market tests for the rental and homeowner market, the results of which were received by the City on June 7, 1999.

"To measure the extent of discrimination, the Institute conducted 30 tests in the City of Carson. We conducted ten inquiry tests in the rental market, ten inquiry tests in the sales market and ten full application tests in the rental market. These tests focused on discrimination against African Americans and Latinos²"

The Report came to the conclusion that: *"The results of the Fair Housing Institute's audit are roughly equivalent to the testing results cited in the Impediment Study" (1997). This similarity indicates that in the past two years little has been done to alleviate the barriers to fair housing faced by African Americans and Latinos in Carson.³"*

² Fair Housing Institute Study; June 4, 1999; Page 50

³ Fair Housing Institute Study; June 4, 1999; Page 58

Impediment 1 of the 1997 AI was broadened and carried forward as Impediment 1 in the 2003 AI.

3. **Develop litigation-related activities:** The City informally determined that the strategy was cost prohibitive given the City's size and financial limitations. Based on the City's determination, the strategy proposed was dropped from the responses in the 2003 AI.
4. **Re-examine outreach activities:** The City re-examined outreach activities in the context of changes to Federal requirements only. The strategy was not originally carried forward to the 2003 AI.

Impediment #2

Follow up on the 1978 study pattern of lending patterns: The Impediment was addressed by the 1999 Fair Housing Institute Study and was not carried forward to the 2003 AI. The impediment was folded into and broadened by Impediment #1 in the 2003 AI.

Impediment #3

1. **Investigate the activities of unlicensed brokers and unauthorized practices that are targeted at Hispanic homebuyers:** The strategy was not addressed in the reporting period and was not originally carried forward to the 2003 AI.
2. **Conduct functional cost analysis of specific functions and set priorities:** The strategy was not addressed in the reporting period and was not originally carried forward to the 2003 AI.
3. **Improve monitoring methods:** The strategy was not addressed in the reporting period and was not originally carried forward to the 2003 AI.

1999 Fair Housing Test and Survey

In June of 1999, the Fair Housing Institute (FHI) conducted a study in the city of Carson based on two strategies⁴.

Tests were conducted by White and Latino testers to determine how they would be treated by landlords in Carson when applying for housing. FHI concluded there was discrimination against African-Americans and Latinos and that activities by landlords showed unfavorable treatment towards minorities.

A survey was developed which asked respondents who lived in Carson how racial factors affected their housing searches and experiences within the local housing market. FHI concluded:

- More than half of the Latinos and Blacks surveyed felt they had been discriminated against while searching for housing in Carson.
- Blacks and Latinos felt that housing discrimination was a significant problem.
- Whites and Asians tend not to perceive discrimination as a serious problem for any group.
- Blacks and Latinos believe lending discrimination is a serious problem for either group; but they report very few direct experiences of it.
- Most Black respondents prefer to live in integrated neighborhoods, in contrast to the highly segregated area of Carson in which most of them live.
- Most White, Latino, and Asian respondents expressed considerable tolerance for neighborhood diversity, and say they would move into a neighborhood that was half Black.

The suggested steps to address the test and survey conclusions were:

⁴ 1999 Fair Housing Test & Survey; Fair Housing Institute; pg. 59

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- Use the results of the 1997 Impediment Study conducted by the Fair Housing Foundation and the 1999 Carson Test/Survey conclusions conducted by the Fair Housing Institute as assistance for the City of Carson in developing a planning process capable of seeing and evaluating specific fair housing goals and evaluating progress towards these goals.
 - Develop adequately funded and well-run programs to implement the plan that the City already has in place.
 - Apply follow-up enforcement, outreach and testing as immediate solutions.

The conclusions of the 1999 testing and surveys conducted by the Fair Housing Institute reinforced the results of the 1997 Impediment Study conducted by the Fair Housing Foundation. The similarities indicate that little action occurred during those two years to alleviate the barriers to fair housing faced by African-Americans and Latinos in Carson. The results of the studies were not reported in either the 2003 or 2010 AI.

2003 Analysis of Impediments to Fair Housing

The following impediments are carried forward from the 1997 AI because the strategies were not addressed in the 1997–2003 period:

Impediment #1 1997 (partial) Develop a regional strategy on real estate steering issues: The strategy was not addressed in the reporting period and was not originally carried forward to the 2003 AI. No progress was made by the City during the 1997-2003 reporting period. The strategy was carried forward to the 2010 AI.

Impediment #3 (1997) Investigate the activities of unlicensed brokers and unauthorized practices that are targeted at Hispanic homebuyers: The strategy was not addressed in the 1997-2003 reporting period and was not originally carried forward to the 2003 AI. The impediment is carried forward to the 2010 AI.

Conduct functional cost analysis of specific functions and set priorities: The strategy was not addressed in the reporting period and was not originally carried forward to the 2003 AI. The

strategy was not addressed by the City during the 2003-2010 reporting period and was not originally carried forward to the 2010 AI. The strategy is carried forward to the 2010 AI.

Improve monitoring methods: The strategy was not addressed in the reporting period and was not originally carried forward to the 2003 AI. The strategy was not addressed by the City during the 2003-2010 reporting period and was not originally carried forward to the 2010 AI. The impediment is carried forward to the 2010 AI.

The following nineteen (19) Impediments to Fair Housing were identified in 2003:

Impediment #1: Hispanics, Asian/Pacific Islanders, and Whites tend to be dispersed throughout the central and southern parts of Carson while Blacks tend to be concentrated in northern Carson. Additionally, tracts where Blacks are the majority tend to be more homogeneous whereas tracts in which Hispanics are the majority tend to be more ethnically diverse. This impediment includes elements of Impediment #1 and #2 in the 1997 AI.

The strategy to address impediment #1 was: Possibly through a separate auditing contract, work with the Housing Rights Center (HRC) to determine if steering or other discriminatory practices are contributing to the concentration of Blacks in the North and Hispanics, Asians and Whites in the central and southern sectors of Carson.

Impediment #2

Although Asian/Pacific Islanders, on a whole, have higher incomes than Whites, Whites are more likely to own their own homes. Hispanics' and Blacks' income appropriately match their likelihood of owning a home.

The suggested steps to remove the impediment were:

1. Work with HRC to focus fair housing outreach efforts to the Asian population in Carson.
2. Work with Carson lenders to focus outreach efforts to the Asian population.

Impediment #3

There is some evidence of “redlining.” The data indicates that as the minority population percentage at the census tract level increases, the loan approval rates decrease (from 55% to 48%) and the denial rates increase (from 21% to 25%).

The suggested step to remove the impediment was:

Work with HRC to conduct fair housing lending training sessions for Carson lenders.

Impediment #4

There is slight evidence of racial approval gaps between Whites and Hispanic applicants. More specifically, the data shows that in the higher income categories, Whites have higher approval rates and lower denial rates than Hispanics and African Americans, suggesting that the gaps favoring White applicants seem to arise largely in the \$60,000 to \$90,000 income range.

The suggested step to remove the impediment was:

Work with HRC to promote HRC’s “Don’t Borrow Trouble” Hotline, which assists residents with potential predatory lending problems.

Impediment #5

The data shows that for Commercial Bank loans, White applications have lower denial rates than Hispanic and African American applicants. But the pattern was reversed for loans through Savings and Loans institutions, where Hispanics had much higher approval rates than Whites.

The suggested steps to remove the impediment were:

1. Work with HRC to conduct fair housing lending training sessions for Carson Lenders.
2. Work with HRC to distribute fair housing information to local lenders.

Impediment #6

Asian American applicants constitute a small percentage of all loan applications in Carson (17% for the home purchase loan market and 14% of the refinancing loan market respectively). This is significant given the growing number of Asian Americans in the city of Carson.

The suggested step to remove the impediment was:

The City will encourage Carson lending institutions to conduct outreach to the Asian community, including the distribution of materials translated into selected Asian languages.

Impediment #7

Zoning Ordinance 9122.5 Child Day Care - CMC 9122.5, which addresses home-based day care centers, conflicts with state law, which explicitly permits licensed in home day care in multiple dwelling units to provide for the number of children for which the day care is licensed. This conflict limits the availability to maintain profitability by restricting the number of children in a licensed day care home below the permissible limits. Accordingly, CMC 9122.5 conflicts with state and federal fair housing laws' prohibition against discrimination based on familial status in that it burdens the rights of individuals who have care and custody of minor children.

The suggested step to remove the impediment was:

The number of children restriction should be eliminated from 9122.5. The code should be revised to state that licensed family day care homes may operate in multiple dwelling units within the restrictions of the state licensing requirements found in the Health & Safety Code.

Impediment #8

- Lack of References to Accessibility and Accommodations: 9126.9 - Design Overlay for Condominium Developments.
- Part 7, Division 3 (Elements of Procedures).
- Zoning Ordinance 9128.17 Declarations of Covenants, Conditions, and Restrictions (paragraph 3).
- Chapter 7, Sections 5700 - 5714 - Abatement of Nuisances.
- 9128.54 Development Standards for Multiple Family Dwellings - Off-street parking must be provided for in accordance with CMC 9162.21.

The suggested steps to remove the impediment were:

- Each of these provisions should include a reference to the Fair Employment and Housing Act (FEHA) and the availability of reasonable accommodations for the disabled.
- Reference should also be made to Part 20 of the United States Code of Regulations, directing readers to the provisions regarding the required number of disabled spaces.

Impediment #9

Residential Property Report Ordinance - City of Carson Ordinance Number 99-1155, effective July 1, 1999, requires a residential property report for all residential property sold, with certain exceptions. One exception is for spousal transfers, which could be viewed as a violation of the FEHA prohibition against differential treatment based on marital status. Unmarried residents who transfer property would be subject to the reporting requirements, while married individuals would not. This constitutes differential treatment based on marital status, in this instance, favoring married couples over unmarried couples and individuals.

The suggested step to remove the impediment was:

If this distinction serves a legitimate government interest, a finding should be made to that effect. Otherwise, if no legitimate government interest is served, the distinction should be eliminated.

Impediment #10

The (1998-2005) Housing Element, Section I, Goal 4 at page I-8 - The Housing Element makes reference to fair housing problems identified in a 1999 audit, but does not identify the groups that have experienced differential treatment. Moreover, the Element refers to but does not specify the policy changes that the City plans to implement to address the problem. The Housing Element was approved by the California Department of Housing and Community Development, thus, no changes are required. However, a more detailed explanation of the fair housing issues that face the City coupled with concrete plans to address the problems would be useful in the future Housing Elements (2006-2014 and 2014-2021).

The suggested steps to remove the impediment were:

1. Identify with specificity the protected groups who experienced differential treatment in the 1999 audit.
2. Explain the City's plan to educate its residents, including housing providers, buyers, tenants, and prospective tenants regarding fair housing rights and responsibilities.

Impediment #11

Housing Element, Section III, Definition of "Disabled Person" - The 2000-2007 Housing Element uses the federal definition of "disabled person" rather than the state definition. The federal definition reads, "Any individual who has a physical or mental impairment which substantially limits one or more major life activities . . ." The State of California Fair Employment and Housing Act ("FEHA") eliminates the words, "substantially" from its definition of "disabled person," thus affording its protections to wider range of disabled persons. Because the FEHA offers residents greater protection than the federal standard, the state standard governs.

The suggested step to remove the impediment was:

Substitute the FEHA definition of "disabled person" in place of the federal definition.

Impediment #12

Housing Element, Section VI, Parking Requirements

The suggested step to remove the impediment was:

This section should include reference to the need for accessible parking spaces in accordance with the United States Code of Federal Regulations, Part 20.

Impediment #13

The most prevalent form of discrimination in mobile home parks and rental housing is familial status discrimination. Thirty-one percent (31%) of rental housing respondents reported that they had experienced this form of discrimination while (nearly) thirty-eight percent (37.5%) of mobile home park respondents reported having experienced familial status discrimination.

The suggested step to remove the impediment was:

The City should work with HRC to distribute multilingual fair housing informational materials to mobile home owners, managers, and residents.

Impediment #14

There is a high overall rate of discrimination in mobile home parks. Twenty-five percent (25%) of mobile home park respondents stated they had experienced discrimination by park management.

The suggested step to remove the impediment was:

Work with HRC to conduct annual mobile home fair housing training sessions.

Impediment #15

The majority of Carson residents and social service agencies are not aware of fair housing laws and that they exist to provide residents protection against housing discrimination. More than fifty percent (52%) of respondents stated they had never heard of the fair housing laws.

The suggested steps to remove the impediment were:

1. The City should include a description of fair housing services available to residents and provide a link to HRC (www.hrc-la.org) on the City's website;
2. Work with HRC to explore alternate and more popular locations for HRC's semi-monthly fair housing clinics in the City;
3. Work with HRC to advertise the semi-monthly clinics;
4. Work with HRC to conduct fair housing information presentations to Carson social service agencies.

Impediment #16

Although the total number of residents calling their fair housing services provider is low relative to comparable cities, the volume of calls has consistently increased over the past five years. This suggests that as the services provider becomes established in the City, more residents are

becoming aware of the available services. It also indicates that fair housing issues continue to be a concern for residents.

The suggested steps to remove the impediment were:

1. The City should include a description of fair housing services available to residents and provide a link to HRC (www.hrc-la.org) on the City's website;
2. Work with HRC to advertise the semi-monthly clinics;
3. Work with HRC to conduct fair housing information presentations to Carson social service agencies.

Impediment #17

The results of the audit conducted in 1997 are partially inconsistent with the audits conducted in FY 00/01 and 01/02⁵. In 1997, the results of the rental inquiry testing showed a 50% measure of discrimination against African-American testers. But the reverse was found in the more recent audits.

The suggested step to remove the impediment was:

Work with the Housing Rights Center to explore this discrepancy through annual rental audit studies.

Impediment #18

A comparison of cases filed by Latino residents to the results of the FY 00/01 and FY 01/02⁶ audits suggests that Latino residents are underreporting incidents of discrimination. The audit showed a pattern of preferential treatment for White testers compared to Latino testers, and a pattern of preferential treatment for African-American testers compared to White testers.

⁵ Completed by the Westside Fair Housing Council, the actual audit could not be found. References are solely from the City's 2003 Analysis of Impediments

⁶ Completed by the Westside Fair Housing Council, the actual audit could not be found. References are solely from the City's 2003 Analysis of Impediments

However, the number of cases filed by African-American residents is higher than the number of cases filed by Latino residents.

The suggested steps to remove the impediment were:

1. Work with HRC to distribute Spanish-language brochures, particularly those aimed at increasing reporting;
2. Work with HRC to conduct targeted outreach to agencies and social service agencies with a diverse clientele.

Impediment #19

Allegations of familial status and national origin discrimination in mobile home parks are a serious fair housing concern. Cases investigated by HRC indicated that in some mobile home parks, there is tension between the residents who have lived there from some time, most of whom are Caucasian seniors, and those who have moved in more recently, many of whom are Latino families with children. In some cases, HRC has found that the managers of the property have also been residents of the parks for many years, and perhaps as a consequence, tend to grant preferential treatment to the seniors and enforce more restrictive rules against the Latino families.

The suggested step to remove the impediment was:

1. Work with HRC to conduct targeted outreach at mobile home parks, including fair housing presentations and training sessions for owners and managers.

2010 Analysis of Impediments to Fair Housing

The following impediments are carried forward from the 1997 AI because the strategies were not addressed in the 1997-2003 period or the 2003-2010 period.

Impediment #1 1997 (partial) Develop a regional strategy on real estate steering issues:

The strategy was not addressed in the reporting period and was not originally carried forward to the 2003 AI. No progress was made by the City during the 2003-2010 reporting period. The

strategy was carried forward to the 2010 AI where the strategy became part of Impediment #1 (2010).

Impediment #3 (1997) Investigate the activities of unlicensed brokers and unauthorized practices that are targeted at Hispanic homebuyers: The impediment was not addressed in the 2003-2010 reporting period and was not originally carried forward to the 2010 AI. The impediment is carried forward to the 2010 AI.

Impediment #3 (1997) Strategies:

Conduct functional cost analysis of specific functions and set priorities: The strategy was not addressed in the 2003-2010 reporting period and was not originally carried forward to the 2010 AI. The strategy is carried forward to the 2010 AI.

Improve monitoring methods: The strategy was not addressed in the reporting period and was not originally carried forward to the 2003 AI. The strategy was not addressed by the City during the 2003-2010 reporting period. The strategy is carried forward to the 2010 AI.

There were 19 Impediments to Fair Housing identified in 2003. None of the impediments or strategies were addressed by the City in the 2003 – 2010 reporting period. All 19 Impediments are carried forward to the 2015 AI.

The following Impediments (referred to as “Findings” in the 2010 AI) were identified in the 2010 AI:

Finding #1

Provide targeted Fair Housing Education and Outreach

The suggested step to remove the finding was:

Address Action by the end of FY 2010-11, and annually thereafter.

Activities: The finding was not addressed in the 2010-2014 reporting period and is carried forward to the 2015 AI.

Finding #2

Increase Fair Housing Services to Include Periodic Testing

The suggested step to remove the finding was:

Address Action by the end of FY 2010-11, and annually thereafter.

Activities: The finding was not addressed in the 2010-2014 reporting period and is carried forward to the 2015 AI.

Finding #3

Increase Lending Outreach to African Americans and Asians

The suggested step to remove the finding was:

Address Action by the end of FY 2010-11, and annually thereafter.

Activities: The finding was not addressed in the 2010-2014 reporting period and is carried forward to the 2015 AI.

SECTION II: Demographic and Economic Overview

This section profiles the City's demographic and housing trends by examining and mapping data from the 2000 Census, the 2010 Census, and the American Community Survey 2014 and other relevant data contained in the 2015-2020 Consolidated Plan. After describing demographic characteristics and trends, the section provides an analysis of the area's housing market and a household's ability to purchase a home. The section concludes with a synopsis of housing problems experienced by residents, such as cost burden, physical defects and overcrowding.

The City contains all or portions of twenty-three census tracts which are used in the mapping software to provide a basis for visual comparison of demographics. A map of the applicable census tracts is contained in [Appendix 1](#).

OVERVIEW

Between 2000 and 2014 the City of Carson's population grew by 2.2%, the number of households increased 3.2%, and the median income increased 35%. The poverty rate for the City decreased from 7.2% in 2000 to 7.1% in 2014.

Housing Problems by Income

Of the 14,190 households in Carson with incomes below 100% of HUD Adjusted Median Family Income (HAMFI), 64% have one or more housing problems. Of the 3,055 households in Carson with incomes between 80% and 100% of HAMFI, 55% have one or more housing problems. Of the 5,255 households in Carson with incomes between 50% and 80% of HAMFI, 59% have one or more housing problems. Of the 3,205 households in Carson with incomes between 30% and 50% of HAMFI, 72% have one or more housing problems. Of the 2,675 households in Carson with incomes below 30% of HAMFI, 74% have one or more housing problems.

Except for households between 80% and 100% of HAMFI, the disproportionate need falls on Hispanic/Latino households. For households between 80% and 100% of HAMFI, the disproportionate need falls on Asian households.

Homeless

Persons in households with only adults comprise the largest single homeless population at 82% of the homeless population. Persons in households with children comprise the second largest homeless population at 9% of the homeless population. The 2015 point in time count indicated 192 individuals were homeless⁷.

Of the chronically homeless population 37% are Chronically Homeless Individuals⁸.

In every category of household, the estimated number of households exiting homelessness is less than the estimated number of households becoming homeless each year.

⁷ Los Angeles Homeless Services Authority: 2015 Point in Time Count

⁸ Los Angeles Homeless Services Authority: Homeless Populations and Sub Populations

Elderly/Seniors

Approximately 39% of all households in Carson have a household member who is elderly.

Approximately 12% of all households of Carson have an elderly person with a disability (frail elderly)⁹. Frail elderly persons are those with a disability that hinders their mobility or prevents them from caring for themselves. According to the California Department of Social Services, Community Care Licensing Division, there are eight facilities for elderly residential care in Carson. These eight facilities have a total capacity of 743 individuals.

Children with Disabilities

The 2010 Census indicates that approximately 6% of all households in Carson have a child under 18 with a disability. The majority of the disability difficulties for children were related to ambulatory, independent living, cognitive, and hearing difficulties¹⁰.

EMPLOYMENT PROFILE

The 2014 American Community Survey reported a labor force of 74,606 persons and an unemployment rate of 14.6% in the city of Carson¹¹.

The 2010 American Community Survey reported a labor force of 71,789 persons and an unemployment rate of 9.3% in the city of Carson¹².

⁹ 2007-2011 CHAS

¹⁰ 2010 Census:

¹¹ EMPLOYMENT STATUS 2010-2014 American Community Survey 5-Year Estimates

¹² EMPLOYMENT STATUS 2010-2014 American Community Survey 5-Year Estimates

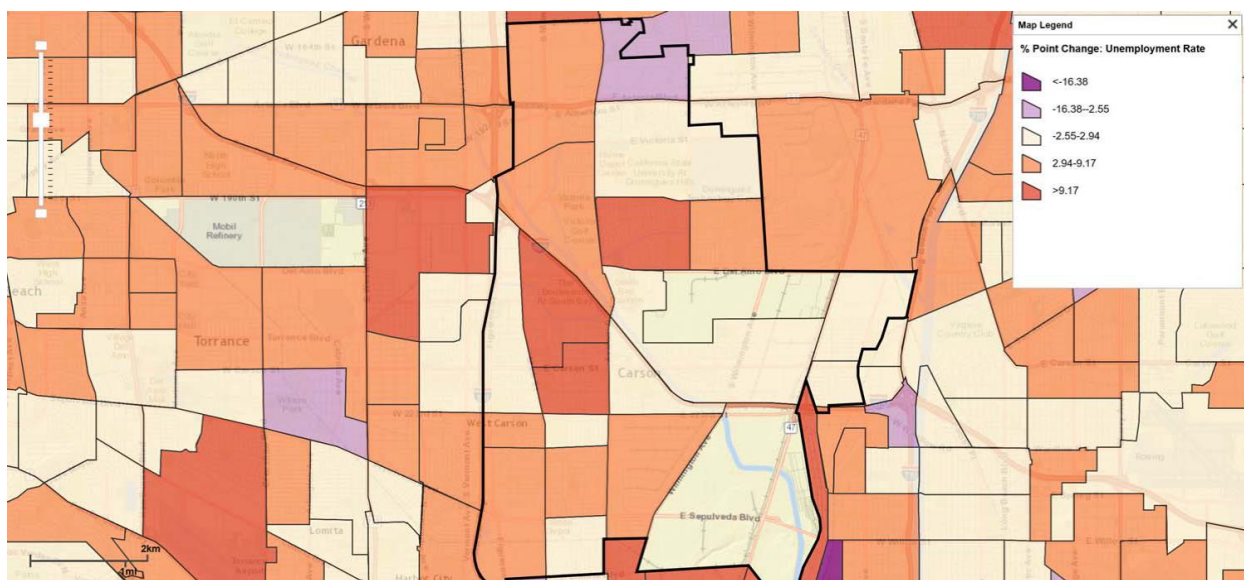


Figure 1: Carson, CA: Changes in Unemployment Rate 2010 - 2014

The increase in unemployment is related to macroeconomic forces affecting California during the reporting period.

The U. S. Census data provides the following breakdown of employment in Carson as of 2014.

The 2014 Employment data indicate that the largest numbers of residents within the city were employed in the educational, health care and social assistance industry (26.7%), followed by manufacturing (13%) and retail trade (10.5%). Employment changed significantly between 2000 and 2014, with Total Employees falling 39%. The hardest hit sectors were manufacturing with a 25.2% decrease and wholesale trade with an 18.5% decrease.

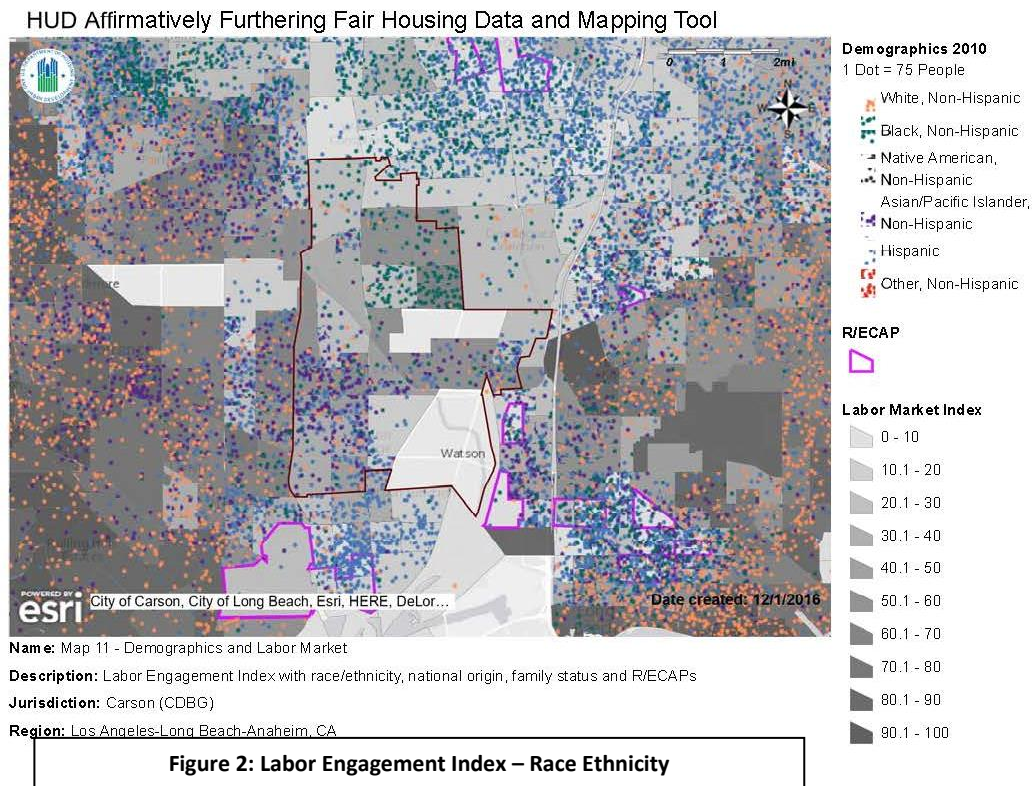
TABLE 1: City of Carson Employment 2000 - 2014						
2012 NAICS code	Meaning of 2012 NAICS code	2000[1] Total Employees	Percent of All Employee s	2014[2] Total Employee s	Percent of All Employee s	Gains or Losses
0	Total for all sectors	66,988	100%	40,832	100%	(26,156)
21-22	Agriculture, forestry, fishing, hunting and Mining	139	0.40%	226	0.06%	87

23	Construction	1,389	3.70%	1,603	3.90%	214
31-33	Manufacturing	7,093	19.00%	5,305	13.00%	(1,788)
42	Wholesale trade	1,641	4.40%	1,338	3.30%	(303)
44-45	Retail trade	4,205	11.30%	4,305	10.50%	100
48-49	Transportation and warehousing and utilities	3,528	9.50%	4,142	10.00%	614
51	Information	1,241	3.30%	1,063	2.60%	(178)
52-53	Finance and insurance; Real estate and rental and leasing	1,934	5.20%	1,759	4.30%	(175)
54-55	Professional, scientific, and management; Administrative and waste management services	3,116	8.40%	3,798	9.30%	682
61-62	Educational services; Health care and social assistance	7,820	21.00%	10,914	26.70%	3,094
71-72	Arts, entertainment, and recreation; Accommodation and food services	1,998	5.40%	2,838	7.00%	840
81	Other services (except public administration)	1,666	4.50%	1,958	4.80%	292
	Public Administration	1,530	4.10%	1,580	3.95%	50

The city saw growth of 42% in arts, entertainment and recreation; accommodation and food services; 39.6% in employees in educational services; health care and social assistance; and

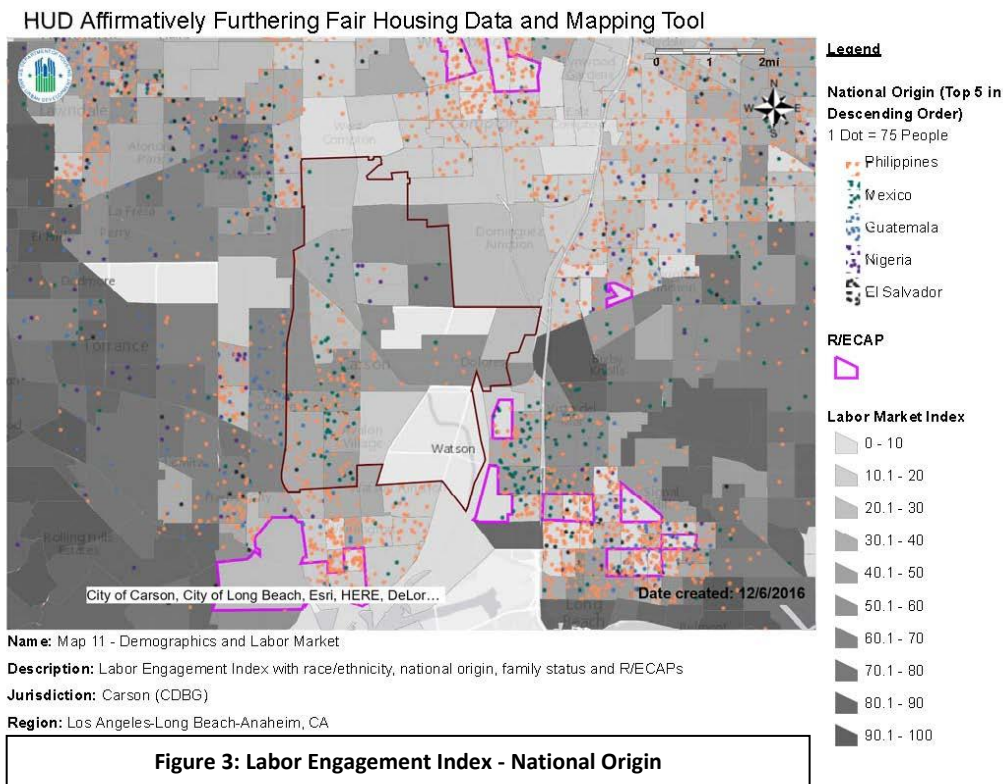
21.9% in professional, scientific, and management; administrative and waste management services employees.

Figure 2 provides the 2010 race/ethnicity demographics of labor in the city. There are no racially/ethnically-concentrated areas of poverty (R/ECAPs) in the city of Carson.



Five census tracts evidence a higher proportion of Native American (non-Hispanic); Asian/Pacific Island (non-Hispanic); and Non-Hispanic populations that have the lower Labor Engagement Index.

Two census tracts evidence a higher proportion of White (non-Hispanic); Black (non-Hispanic) and non-Hispanic populations that have the lower Labor Engagement Index.



Four census tracts in the northern half of the city evidence a higher proportion of Mexican, Nigerian, and Filipino populations that have the lower Labor Engagement Index.

Five census tracts in the southern half of the city evidence a higher proportion of Filipino, Mexican and Guatemalan populations that have the lower Labor Engagement Index.

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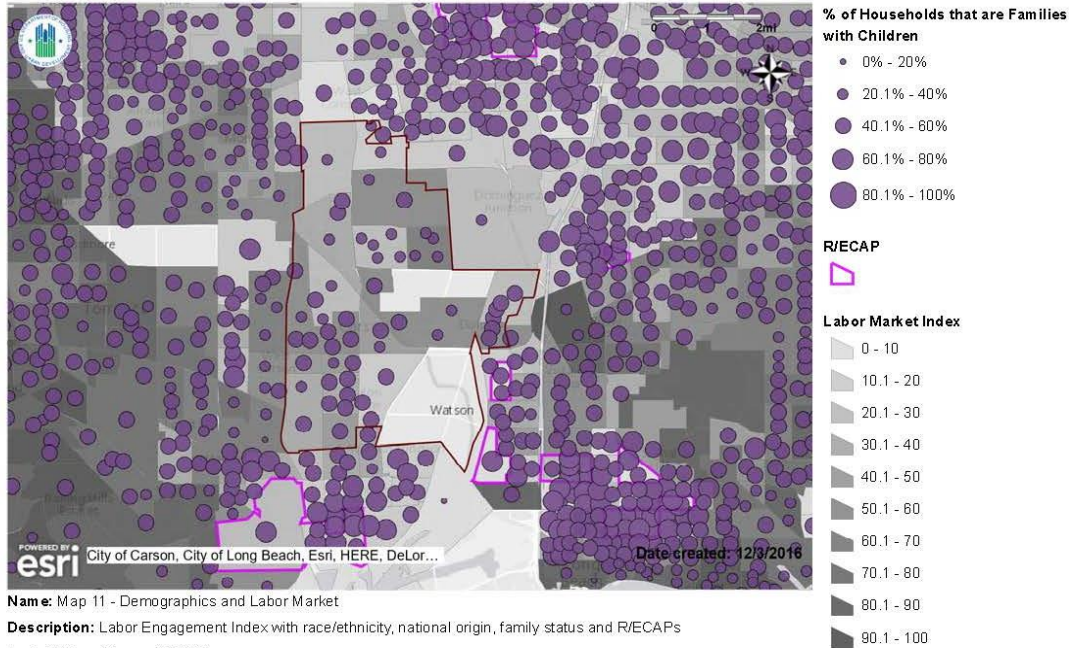


Figure 4: Labor Engagement Index Families with Children

Four census tracts in the northern half of the city evidence a higher proportion of families with children that have the lower Labor Engagement Index.

Two southern census tracts evidence a higher proportion of families with children that have the lower Labor Engagement Index.

Demographic Profile

POPULATION

TABLE 2: Population Demographics 2000-2014				
Demographics	Base Year: 2000	2010	Most Recent Year: 2014	% Change
Population	87,730	91,714	92,475	5.1%
Households	24,648	24,903	25,432	4.1%
Median Income	\$52,285	\$68,425	\$71,420	36.6%

Between 2000 and 2014 the city's population had grown 5.1%, the number of households increased 4.1% and the median income increased 36.6%.

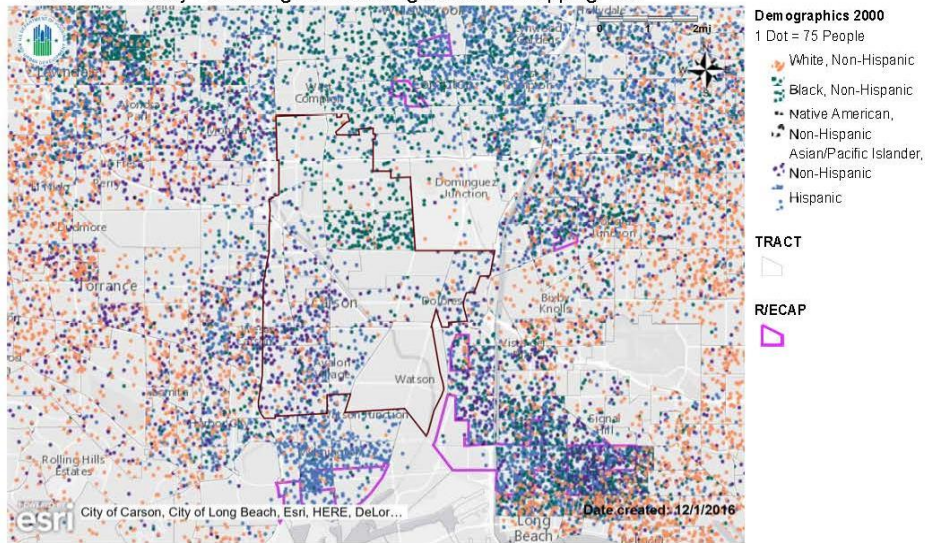
RACE/ETHNICITY

In 2000, the city's population was 25.7% White, 25.4% Black, 22.3% Asian, 18.8% Filipino, 18% Some Other Race and 3% Native Hawaiian or Other Pacific Islander. The Hispanic population comprised 34.9% percent of the city's total population.

In 2010, the city's population was 30.3% White, 23.5% Black, 26% Asian, 21.7% Filipino, 10.6% Some Other Race and 3.1% Native Hawaiian or Other Pacific Islander. The Hispanic population comprised 37.5% percent of the city's total population.

In 2014 the city's population was 30.8% White; 20.7% Black, 25.9% Asian; 21.2% Filipino; 9.8% Some Other Race and 2.2% Native Hawaiian or Other Pacific Islander. The Hispanic population comprised 39.6% of the city's population.

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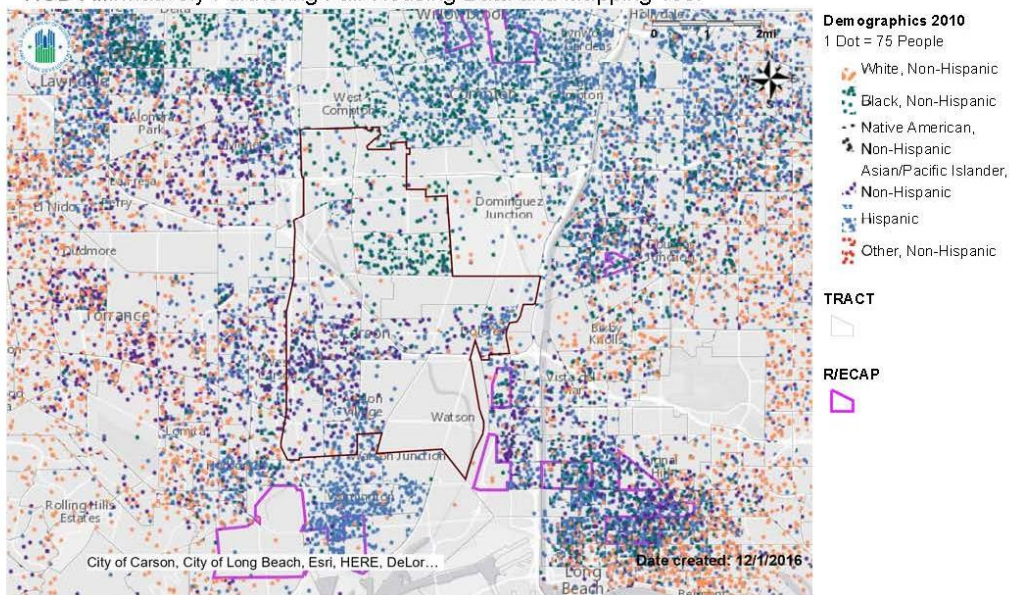


Name: Map 2 - Race/Ethnicity Trends

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

Figure 5: Race Ethnicity Trends

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Name: Map 1 - Race/Ethnicity

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Figure 6: Current Race Ethnicity Density

Region: Los Angeles-Long Beach-Anaheim, CA

The general pattern over the data period indicates the Black and Native Hawaiian or Other Pacific Islander populations are declining while the White, Asian and Filipino populations are increasing.

The map below illustrates the distribution of the Black or African-American population in Carson in 2014. Black populations are primarily located in the northern areas of the city with concentrations of 6.85% to 71.4%. The area bounded on the west by Avalon Boulevard, on the

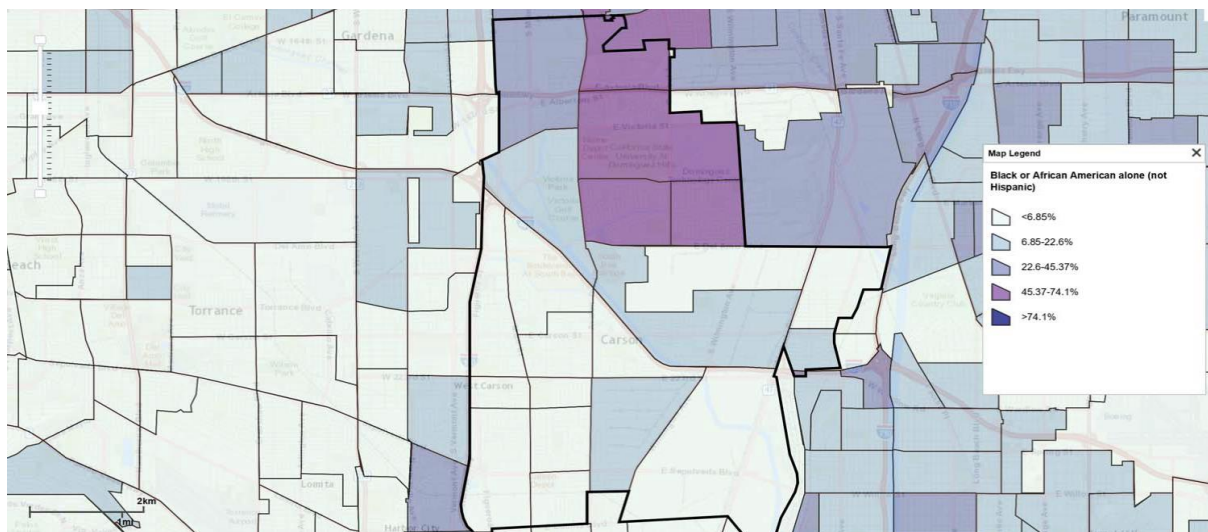


Figure 7: Black or African American Population Distribution 2014

south by East Del Amo Boulevard and on the north and east by the city boundaries has the highest concentration of Black or African-American households, ranging from 45% to 74%¹³.

The White population of the city is widely dispersed with no apparent concentrations above 17% citywide.

¹³ Census Tracts: (543100; 543304, 543321, 543322)

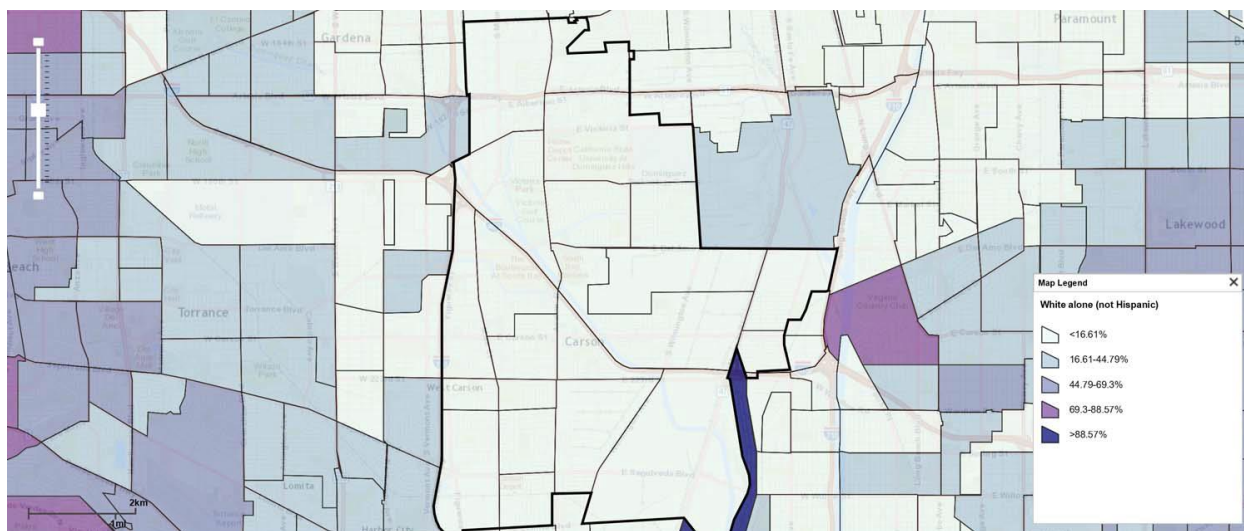


Figure 8: Distribution of the White Population - City of Carson, 2014

By 2014 the third largest cohort was the Asian population, which had remained constant at 25.9% of total population. The following map illustrates the distribution of the Asian population in the City in 2014. Asian populations are primarily located in the southwestern and central portions of the City along the I-405 and I-110 corridors. There are nine census tracts with Asian population concentrations between 27% and 52% of total census tract population¹⁴.

¹⁴ Census Tracts: (543801; 543802; 543501; 543601; 543604; 543701; 543703; 543306; 543903)

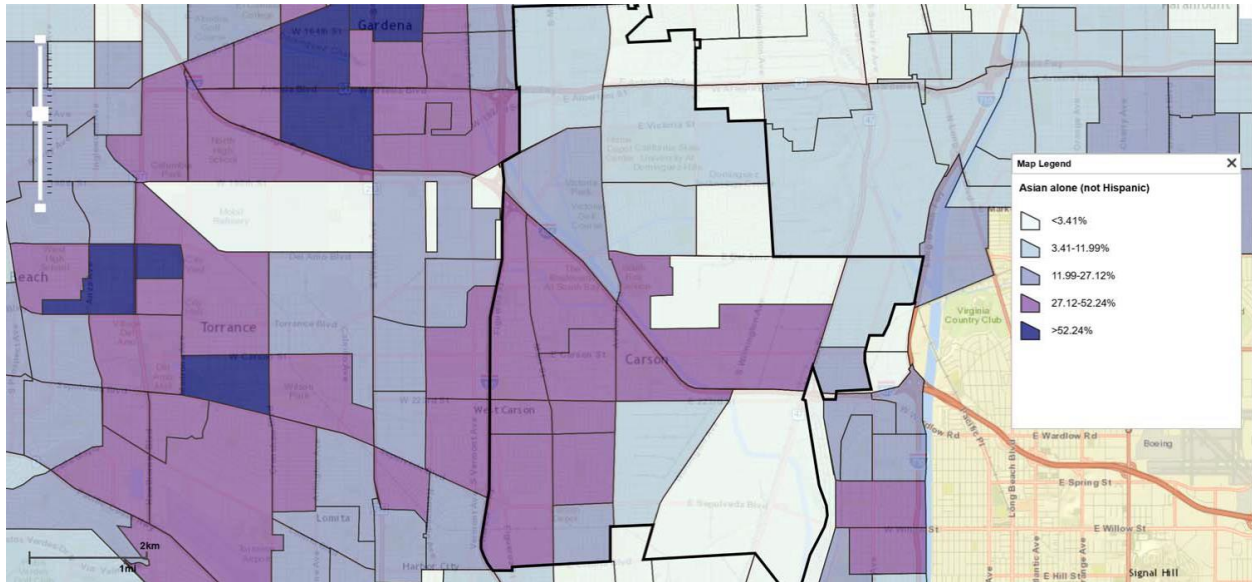


Figure 9: Asian Population Distribution 2014

Hawaiian and Pacific Islander, the fourth largest cohort is widely distributed with no concentrations above 17% as illustrated in Figure 10 below.

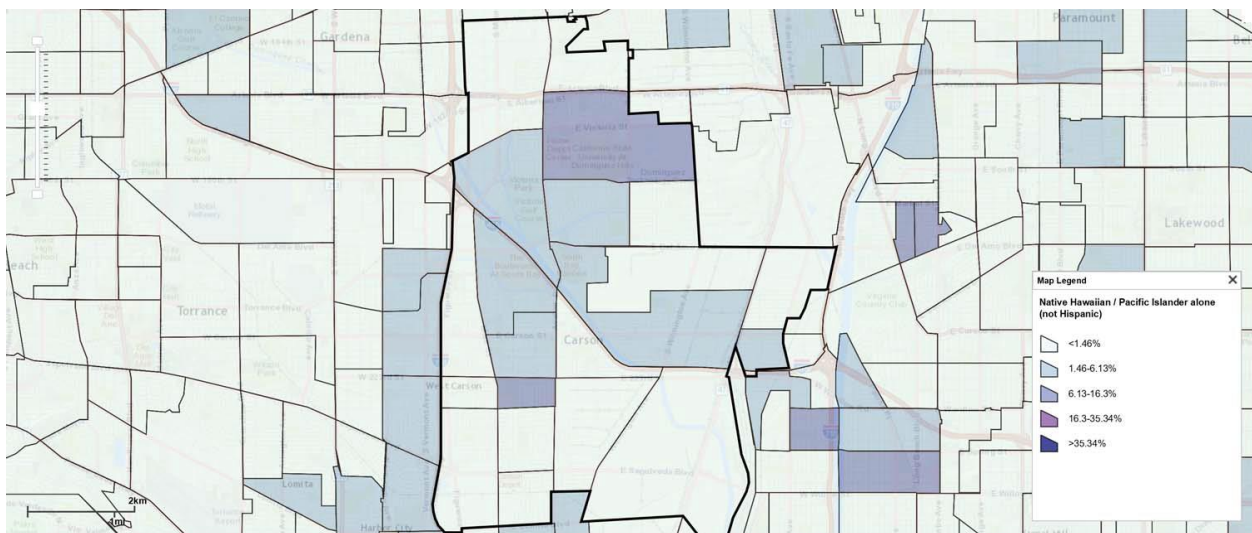


Figure 10: Native Hawaiian Pacific Islander Population Distribution - City of Carson

By 2014 the Hispanic Origin population had increased to 39.6% of total population. The map below illustrates the distribution of the Hispanic Origin population in Carson in 2014.

The highest concentrations of Hispanic populations in the city are located in the southern, eastern and central I-405 corridor with concentrations ranging from 47% to 77%.

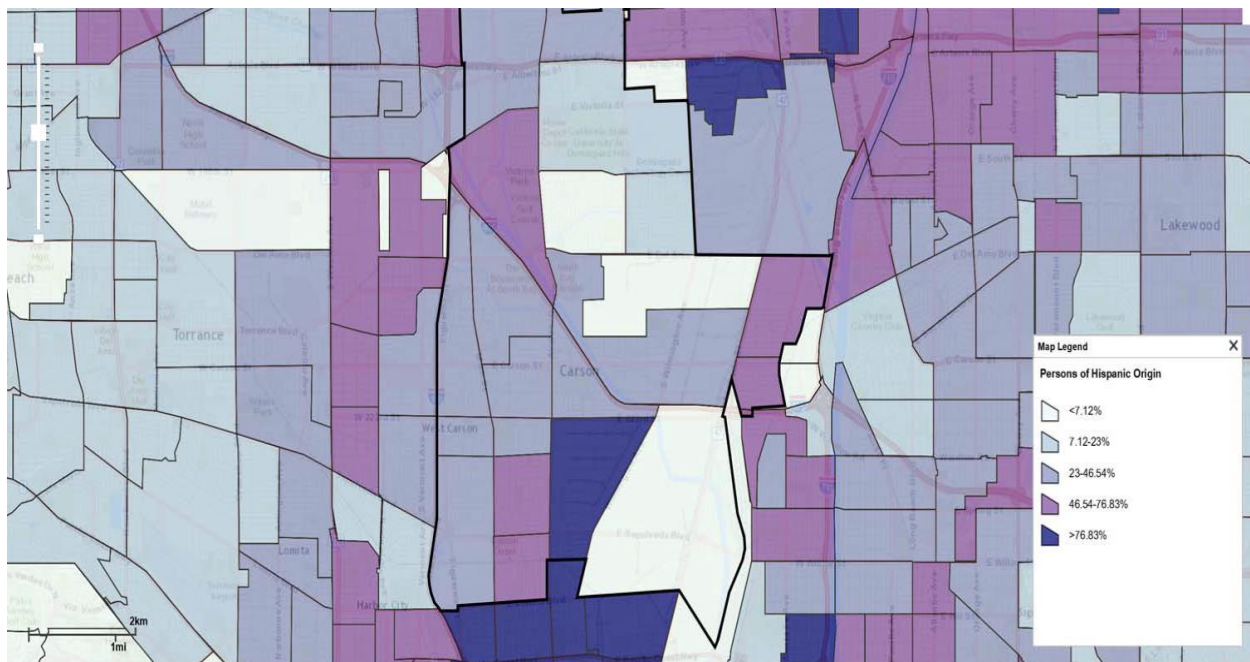
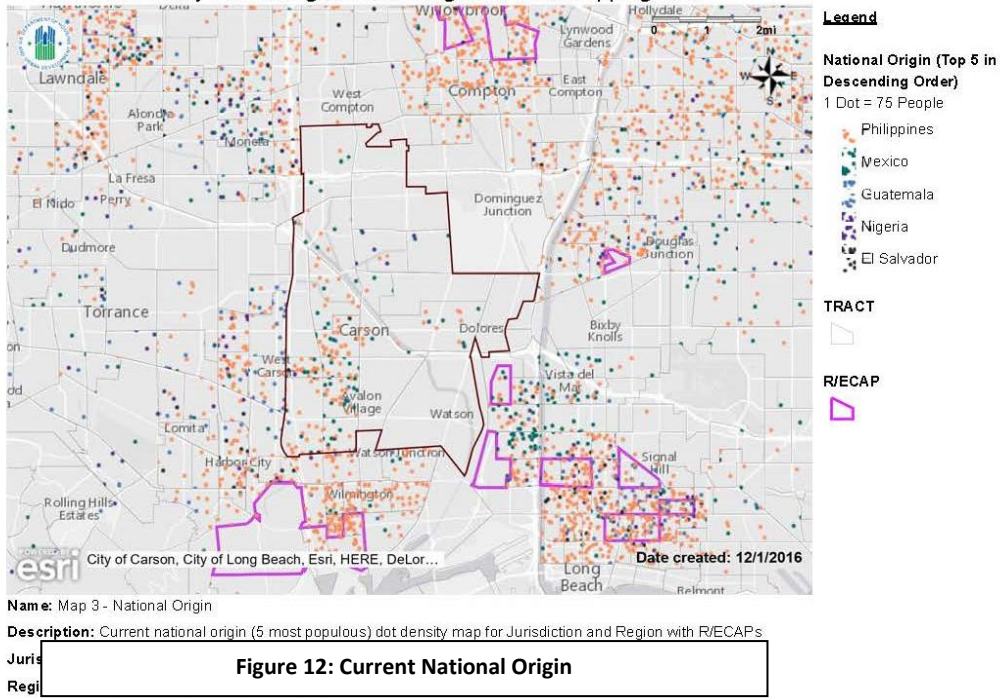


Figure 11: Distribution of Persons of Hispanic Origin - City of Carson

There are six census tracts with Hispanic population concentrations between 47% and 77% of total census tract population¹⁵.

¹⁵ Census Tracts: (543905; 543702; 543703; 543400; 544001; 544002)

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NATIONAL ORIGIN AND LIMITED ENGLISH PROFICIENCY

TABLE 3: NATIONAL ORIGIN OF POPULATION IN THE CITY OF CARSON			
National Origin	Country	Population	Percent
#1 country of origin	Philippines	13,842	15.09%
#2 country of origin	Mexico	10,578	11.53%
#3 country of origin	Guatemala	941	1.03%
#4 country of origin	Nigeria	758	0.83%
#5 country of origin	El Salvador	628	0.68%
#6 country of origin	Vietnam	556	0.61%
#7 country of origin	Korea	492	0.54%
#8 country of origin	China excl. Hong Kong & Taiwan	327	0.36%
#9 country of origin	Cambodia	303	0.33%
#10 country of origin	Belize	232	0.25%

The national origin of the city's population is reflected in Figure 12 and Table 3. Limited English Proficiency is displayed in Table 4. The City should ensure that communications with the public include Spanish and Tagalog translations or translators.

TABLE 4: LIMITED ENGLISH PROFICIENCY (LEP) CITY OF CARSON			
Limited English Proficiency (LEP) Language	Language	Population	Percent
#1 LEP Language	Spanish	10,845	12.57%
#2 LEP Language	Tagalog	6,501	7.54%
#3 LEP Language	Other Pacific Island Language	748	0.87%
#4 LEP Language	Korean	457	0.53%
#5 LEP Language	Vietnamese	316	0.37%
#6 LEP Language	Chinese	238	0.28%
#7 LEP Language	African	229	0.27%
#8 LEP Language	Cambodian	226	0.26%
#9 LEP Language	Japanese	187	0.22%
#10 LEP Language	Other Indic Language	141	0.16%

HOUSEHOLD CHARACTERISTICS

Between 2000 and 2014 the city of Carson's population has grown 2.2%. The number of households has increased from 24,648 to 25,432 or 3.2%.

TABLE 5: Household Characteristics					
Household Type	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	2,670	3,205	5,255	3,050	10,735
Small Family Households *	885	1,300	2,420	1,350	6,035
Large Family Households *	210	700	1,360	970	1,945
Household contains at least one person 62-74 years of age	755	885	1,550	840	2,655
Household contains at least one person age 75 or older	560	700	700	185	775
Households with one or more children 6 years old or younger *	280	665	1,405	664	545
* the highest income category for these family types is >80% HAMFI					

Small Family Households represent 48.1% of all households. Large Households represent 20.8% of all households. Households with a member between 62 and 74 years of age represent 26.8% of all households. Households with children under six years of age represent 14.3% of households. Households with one member over 75 years of age comprise 11.7% of households. Of the 10.7% of city households at or below 30% of HUD Adjusted Median Family Income (HAMFI), 49.3% contain an elderly household member, 33.1% live in Small Family Households, 7.9% live in Large Family Households, and 10.5% are households with one or more children under the age of six.

Of the 12.9% of city households between 30% and 50% of HAMFI, 49.4% contain an elderly household member, 40.6% live in Small Family Households, 21.8% live in Large Family Households, and 20.7% are households with one or more children under the age of six.

Of the 21.1% of city households between 50% and 80% of HAMFI, 42.8% contain an elderly household member, 46.1% live in Small Family Households, 25.9% live in Large Family Households, and 26.7% are households with one or more children under the age of six.

Of the 25,432 households in the city of Carson, 0.4% have substandard housing or housing lacking complete plumbing or kitchen facilities. Of the total of estimated 105 substandard units, 67% are occupied by renter households.

Those households which are severely overcrowded comprise 1.9% of all households while those households which are overcrowded and not substandard comprise 2.5% of all households.

Those households who have a cost burden of greater than 50% of income comprise 10.8% of all households. Of the total of 3,910 households with a 50% cost burden, 70.5% are owner occupants.

Those households who have a cost burden of greater than 30% of income comprise 9.6% of all households. Of the total of 3,510 households with a 30% cost burden, 69.8% are owner occupants¹⁶.

¹⁶ 2015-2020 Consolidated Plan: Summary Table: Housing Problems (Households with one of the listed needs)

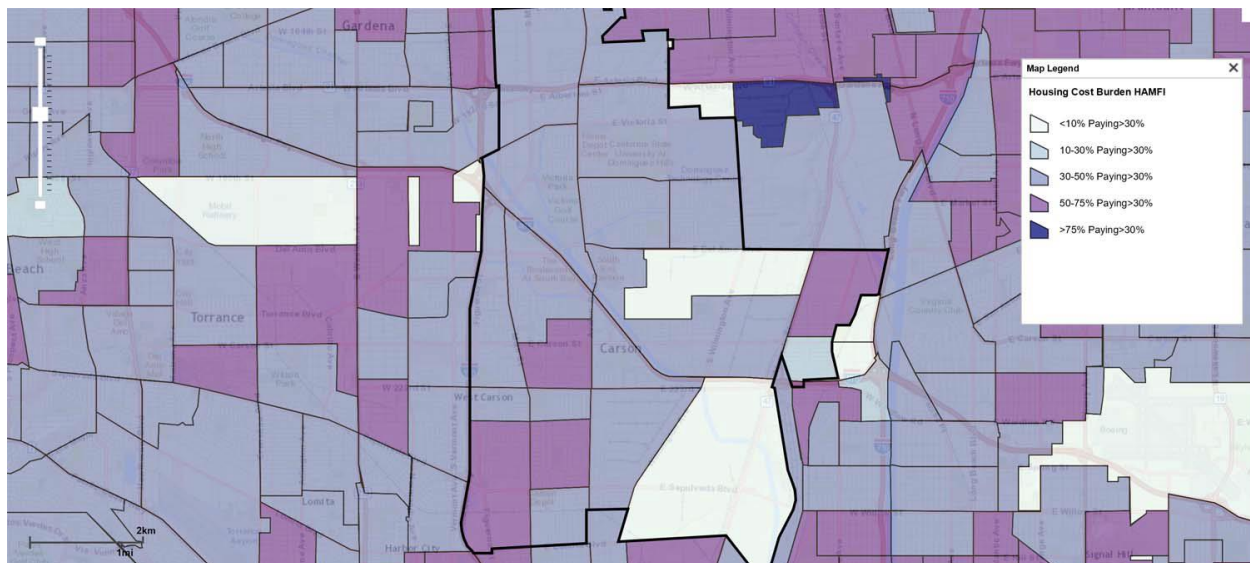


Figure 13: Housing Cost Burden >30% of Income - City of Carson

There are four census tracts with concentrations between 50% and 75% of tract households paying more than 30% of their income for housing¹⁷. The high concentration census tracts are predominately Asian and Hispanic.

The current status of homeless in Carson and the surrounding area is summarized in the following Figure 14.

¹⁷ Census Tracts (543604; 543702; 543802; 544001)

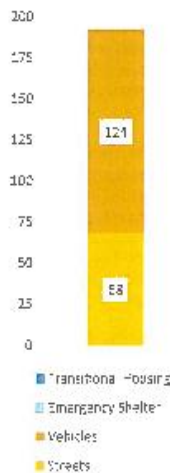


2015 Greater Los Angeles Homeless Count

Carson

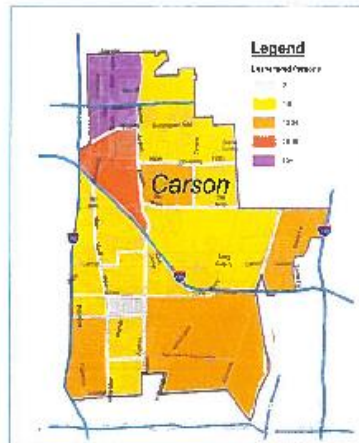
192 Homeless Persons
on January 28, 2015

Persons Experiencing Homelessness
by Location



Transitional Housing	0
Emergency Shelter	0
Cars	16
Vans	99
RVs	9
Single Adults on the Street	31
Family Members on the Street	0
Unaccompanied Youth on the Street	0
Make-Shift Shelters	24
Tents	13
Total Persons	192

- 8% of the South Bay's Unsheltered population is located in Carson (living in vehicles or on the streets)
- There are approximately 4 times more vacant housing units than homeless persons in Carson (Source: CA Department of Finance, "E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011-2015, with 2010 Benchmark," May 2015).
- Changes From Homeless Count 2013:
 - Increase in persons from 158 to 192
 - Decrease in Sheltered homeless persons (from Transitional Housing or Emergency Shelter) from 5 to 0
 - Decrease in persons in Vehicular homeless locations from 130 to 124
 - Increase in persons from Street homeless locations from 23 to 68



670 W. 9th Street, San Pedro, CA 90731

sbceh.org

contactSBCEH@gmail.com

Figure 14: 2015 Homeless Count - City of Carson

Persons in households with only adults comprise the largest single homeless population at 82% of the homeless population. Persons in households with adults and children comprise the second largest homeless population at 9% of the homeless population¹⁸.

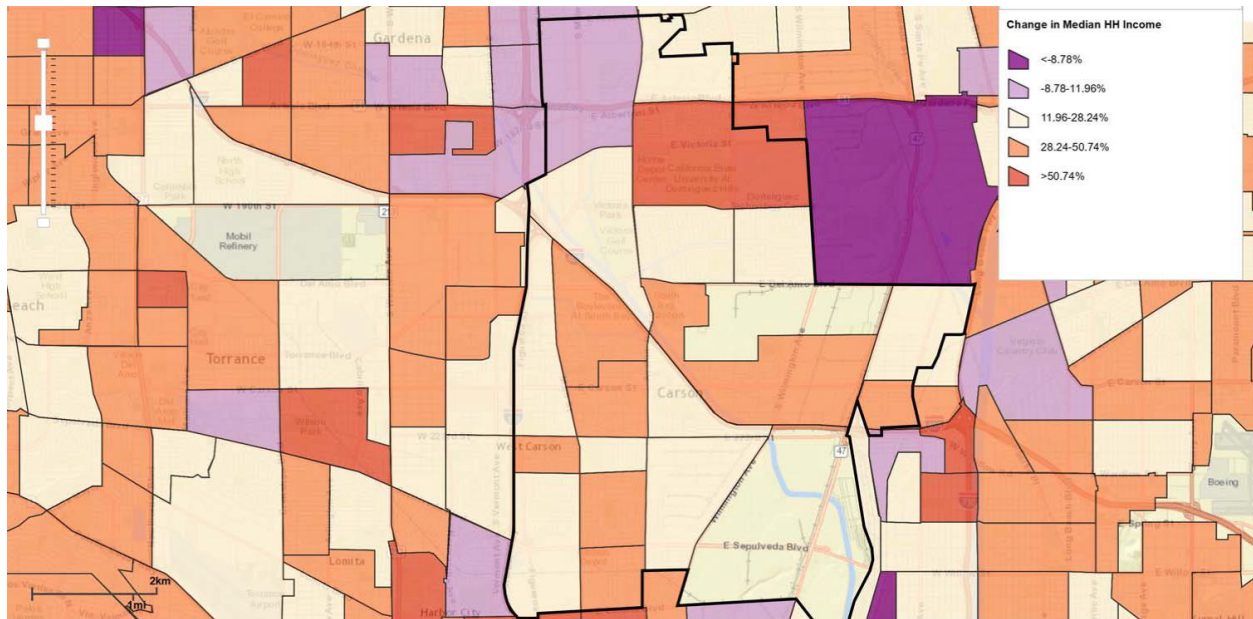


Figure 15: Change in Median Income: 2000 to 2010 - City of Carson

DISABLED POPULATIONS

Approximately 23.5% of Carson's population has a disability. Table 6 (on the following page) displays disabilities by type and affected populations for the city:

¹⁸ Los Angeles Homeless Services Authority: Homeless Populations and Subpopulations (2015)

TABLE 6: Disabilities By Type City of Carson ¹⁹		
Disability Type	Population	Percent
Hearing difficulty	2,342	2.72%
Vision difficulty	1,511	1.75%
Cognitive difficulty	3,618	4.20%
Ambulatory difficulty	5,715	6.63%
Self-care difficulty	2,677	3.11%
Independent living difficulty	4,375	5.08%
TOTAL	20,238	23.5%

Figures 16 and 17(following page) display the distribution of disabilities in Carson.

¹⁹ 2010 Census – 2014 American Community Survey

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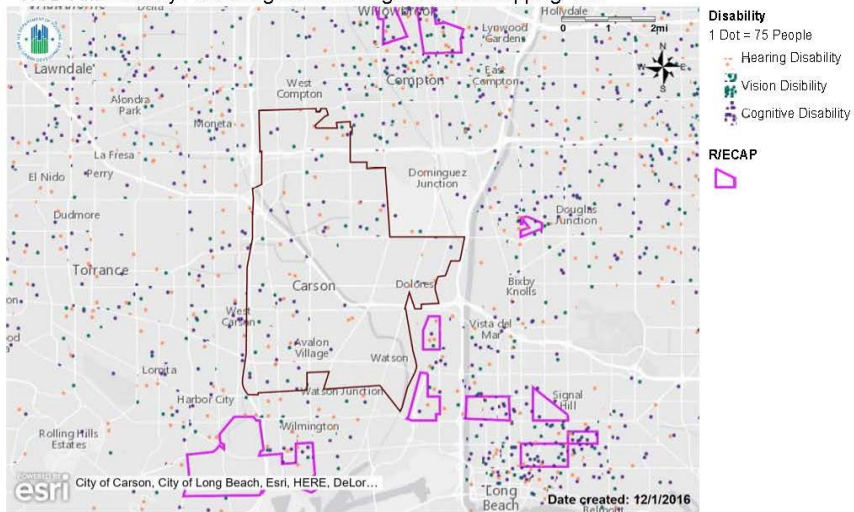


Figure 16: Distribution of Hearing, Vision and Cognitive Disability

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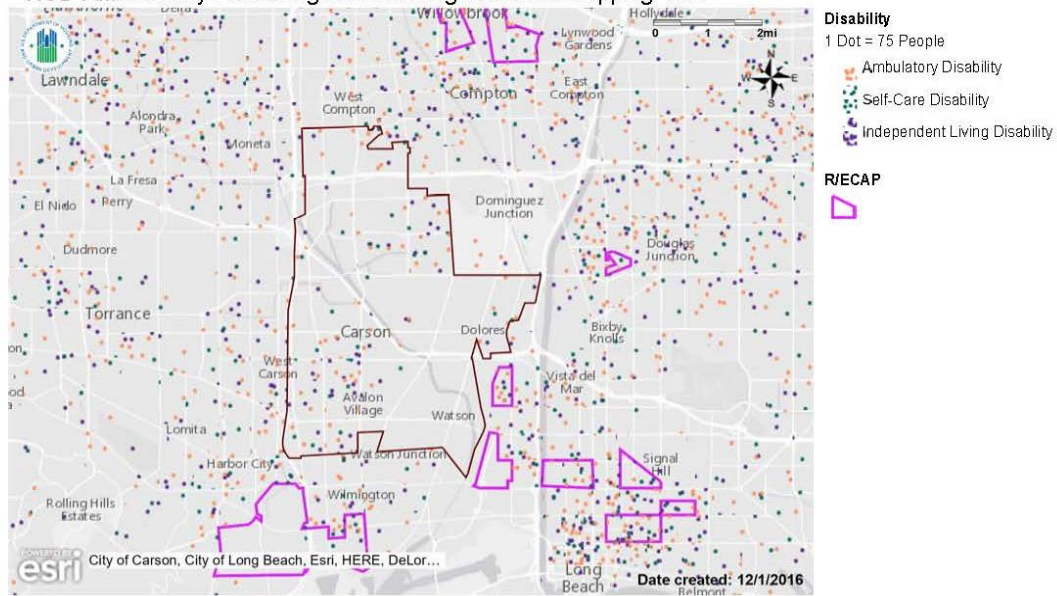


Figure 17: Distribution of Ambulatory, Self-Care and Independent

Income Profile

INCOME

Between 2000 and 2014 median income in Carson increased 35%. The Figure below illustrates the change in median income. While the median income has increased, the poverty rate for the City has decreased slightly from 7.2% in 2000 to 7.1% in 2014.

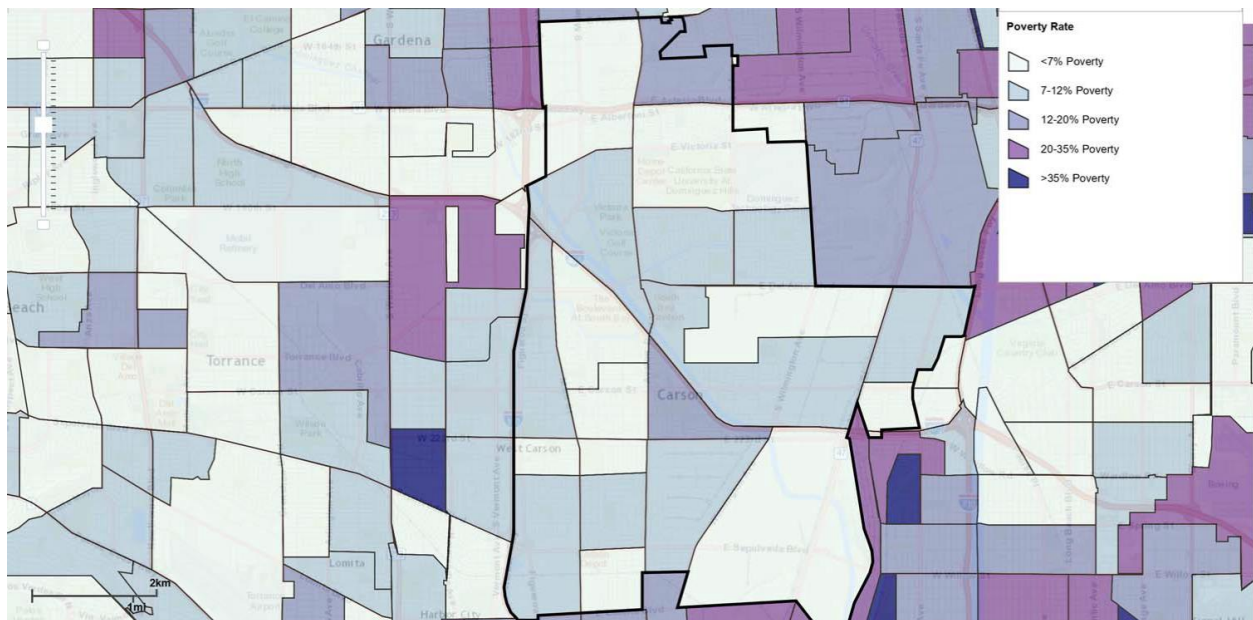


Figure 18: Poverty Rate By Census Tract - City of Carson

There are two census tracts in the city which have poverty rates between 12% and 20% of the tract population²⁰. There are eight census tracts in the city which have poverty rates between 7% and 12% of the tract population²¹. The remaining census tracts have less than 7% poverty rates. One of the census tracts with 12% and 20% of tract population is predominately African American while the second is predominately Asian.

²⁰ Census Tracts: (543903; 543100)

²¹ Census Tracts: (543400; 543322; 543303; 543501; 543306; 544001; 543400; 543905)

The low-moderate income limits for HUD program participation for a family of four in Carson was \$66,400 in 2015. The table below provides 2015 income limits by family size²².

TABLE 7: 2015 Income Levels for City of Carson HUD Programs								
INCOME LEVEL	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
EXTREMELY LOW	\$17,450	\$19,950	\$22,450	\$24,900	\$28,410	\$32,570	\$36,730	\$40,890
VERY LOW	\$29,050	\$33,200	\$37,350	\$41,500	\$44,850	\$48,150	\$51,500	\$54,800
LOW	\$46,500	\$53,150	\$59,800	\$66,400	\$71,750	\$77,050	\$82,350	\$87,650

TENURE

Tenure is calculated as tenant or owner occupancy as a proportion of occupied housing units. In 1990, the city's homeownership rate was 77.9%. The rate decreased to 76.2% in 2010, then fell further to 74.7% by 2014²³.

The following map shows the distribution of owner-occupied households in the city in 2014.

²² U.S. Department of Housing & Urban Development: Annual Income Limits for the CD Program, March 2015

²³ SELECTED HOUSING CHARACTERISTICS 2010-2014 American Community Survey 5-Year Estimates

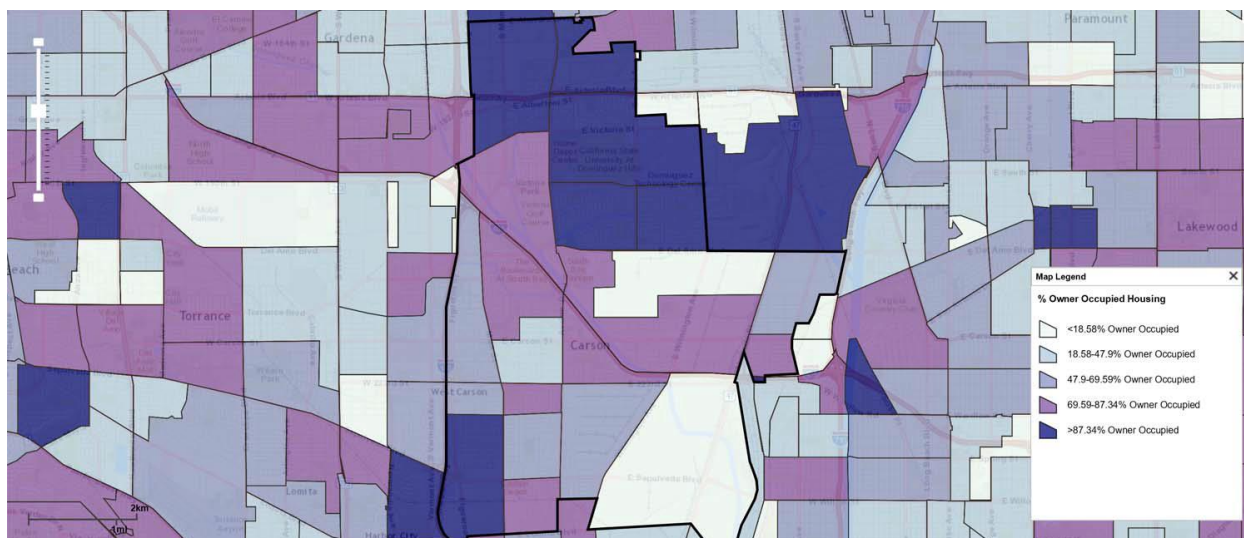


Figure 19: Percent Owner Occupied Housing - 2014 City of Carson

Overall, Carson has a higher percentage of owner occupied housing than both Los Angeles County as a whole and the United States as a whole²⁴. Owner occupied housing is scattered through the residential areas of the city but is concentrated north of East Del Amo Boulevard in predominately African-American census tracts.

Conversely, renter occupied housing is predominately located in census tracts along or to the south of the San Diego Freeway (I-405). The highest concentration of rental housing is between 27% and 47% in the Carson Dolores Neighborhood²⁵.

²⁴ US Census Bureau: US was 63.7% in December 2015; Los Angeles County was 48.9%

²⁵ Census Tract (543802)

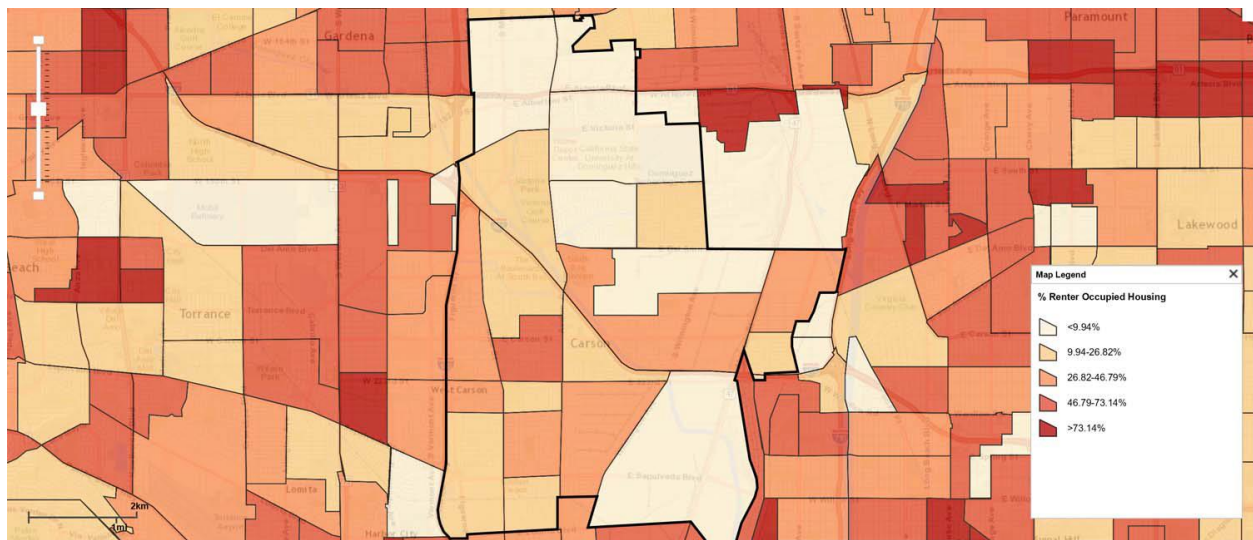


Figure 20: Percent Rental Occupied Housing 2014 - City of Carson

CPD Maps

<https://egis.hud.gov/cpdmaps/>

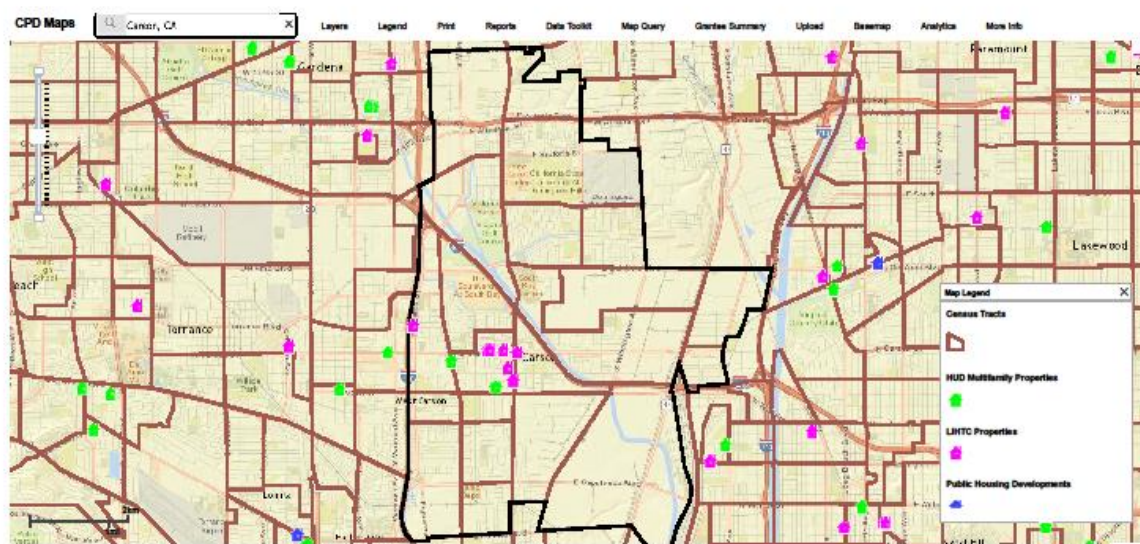


Figure 21: LIHTC & HUD Multifamily Housing in the City of Carson - 2015

In total, six low income housing tax credit properties and three HUD Multifamily properties are located in Carson. Seven of the nine projects noted are located in a single census tract which encompasses the Carson Dolores neighborhood²⁶.

Overview of Housing Supply

TENURE AND TYPE

The table below breaks down the City's housing stock by unit type. Single-unit detached homes are by far the most prominent unit type, accounting for 70% of all housing units. Multi-family developments account for 9% of all housing units in Carson, while 9% of the housing stock is classified as "mobilehome, boat, RV, or van".

Table 8: All Residential Properties by Number of Units		
Property Type	Number	%
1-unit detached structure	18,252	70%
1-unit, attached structure	2,433	9%
2-4 units	692	3%
5-19 units	793	3%
20 or more units	1,435	6%
Mobilehome, boat, RV, van, etc	2,312	9%
Total	25,917	100%

²⁶ Census Tract (543802)

The 2014-2021 Regional Housing Needs Allocation²⁷ for the City of Carson is shown in Table 9 below.

The Regional Housing Needs Assessment (RHNA) develops goals or the “regional share” goals for new housing construction. The allocation takes into account factors such as market demand for housing, employment opportunities, availability of suitable sites and public facilities, commuting patterns, type and tenure of housing need, and other considerations. In determining a jurisdiction’s share of new housing needs by income category, the allocation is adjusted to avoid an over-concentration of lower income households in any one jurisdiction. The current RHNA prepared by the Southern California Association of Governments (SCAG) allocates housing needs for the period from January 1, 2014 to October 31, 2021 (essentially a seven-year cycle). Carson’s RHNA for the 2014-2021 planning period has been determined by SCAG to be 1,698 housing units.

TABLE 9: Regional Housing Needs Allocation		
Income Level	Total Construction Need (units)	Percent of Units by Income Level
<i>Extremely Low Income (<30% MFI)</i>	224	-
Very Low Income (30% to 50% of MFI)	447	26.3%
Low Income (51% to 80% of MFI)	263	15.5%
Moderate Income (81% to 120% of MFI)	280	16.5%
Above Moderate Income (>120% of MFI)	708	41.7%

²⁷ SCAG Regional Housing Needs Assessment 2012; 2015 Consolidated Plan pg. 66

Between 2000 and 2010, the percentage of single family detached units declined from 77.9% to 76.8% of all housing units. Between 2010 and 2015, the percentage of single family detached units increased from 76.8% to 80.9% of all housing units. Carson suffered the general effects of the 2008-2010 recession to a lesser degree than most cities Carson's size and appears to have fully recovered.

AGE AND CONDITION

The overall age of housing stock in Carson has remained static in the last four years. Table 10 provides an overview

Table 10: Age of Housing Stock in Carson – 2010-2014		
Time Frame	2010	2014
Built Before 1960	79.6%	82.8%
Built Before 1979	32.0%	35.6%

Based on the 2014 American Community Survey data, 82.8% of the total housing stock in the city was built in 1960 or earlier. In addition, 35.6% of the housing stock was built prior to 1979, making lead-based paint a potential hazard.

Nationally, the percent of housing stock built before 1959 is 31.2%, while the percent of housing built before 1980 is 60%. Carson's housing stock is considerably older and more likely to contain lead-based paint than the national average.

The distribution of rental housing built before 1980 (Figure 22) shows concentrations north of the Gardena Freeway²⁸ (California Route 91), along the western portion of the I-405 corridor²⁹, and in the southwest corner of the city³⁰. The tract north of the Gardena Freeway is primarily African American, while the tracts along the I-405 corridor and in the southwest corner are predominately Asian. Rental housing built before 1949 is predominately located in one census tract in east Carson³¹.

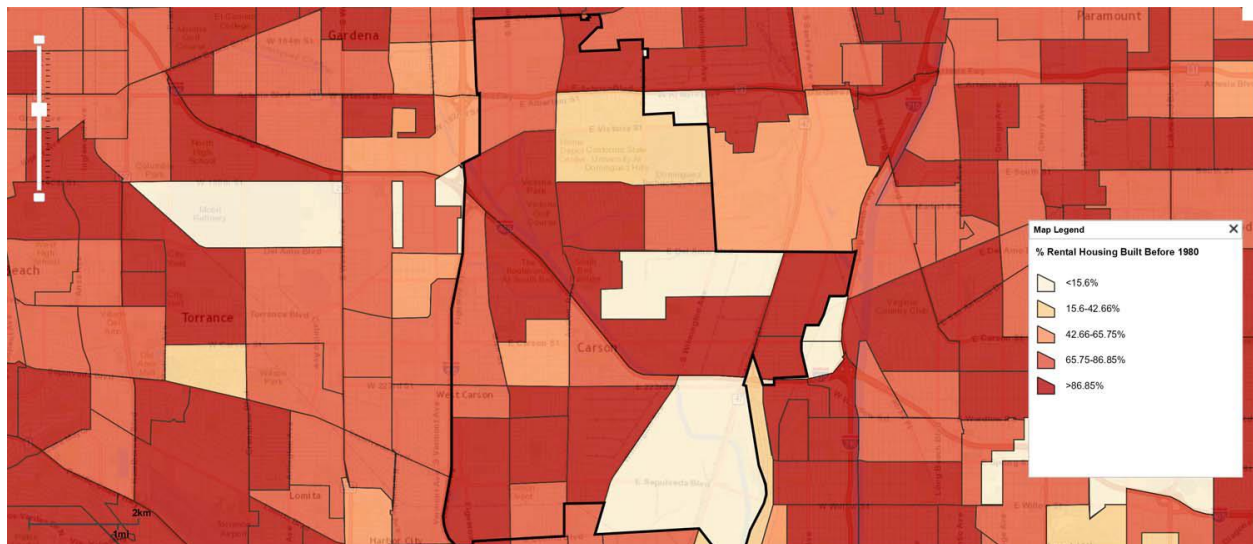


Figure 22: Rental Housing Built Before 1980 - City of Carson

HUD describes four housing conditions as being problematic:

1. The home lacks complete or adequate kitchen facilities;
2. The home lacks complete or adequate plumbing facilities;
3. The home is over-crowded - defined as more than one person per room;

²⁸ Census tract: (543100)

²⁹ Census tracts: (543400; 543322; 543321; 543306; 54903)

³⁰ Census tracts: (543604, 543702, 543703)

³¹ Census tract: (544001)

-
4. The household is cost burdened by paying more than 30% of their income towards housing costs.

Table 11: Condition of Units ³²				
Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected condition	8,264	44%	2,995	50%
With two selected conditions	495	3%	303	5%
With three selected conditions	19	0%	0	0%
With four selected conditions	0	0%	4	0%
No selected conditions	10,093	53%	2,746	45%
Total	18,871	100%	6,048	100%

At least 47% of owner occupied housing in Carson suffers from at least one of the HUD defined housing conditions while 55% of renter occupied housing has one of the four housing conditions.

VACANT UNITS

In 2014 the vacancy rate for owner occupied housing was 0.9%, while the vacancy rate for rental housing was 1.5%. The low vacancy rates in owner occupied housing reflect a market in

³² American Community Survey 2009 -2014

which demand for units is very high and the supply is static. The low vacancy rates in rental housing reflect a very tight rental market.

HOUSING AFFORDABILITY

Housing affordability is calculated as 30% of income for rent, and 28% of income for homeownership.

Table 12: Cost of Housing			
	Base Year: 2000	Most Recent Year: 2014	% Change
Median Home Value	\$176,100	\$341,200	93.8%
Median Contract Rent	\$697	\$1,138	63.3%

Both the median home value and the median contract rent have increased significantly since 2000. The median home value fell to \$422,100 by 2010 and has continued to fall to a 2014 value of \$341,200, a 19% decrease.

Table 13: Renters by Cohort		
Rent Paid	Number	Percent
Less than \$500	287	4.9%
\$500-999	1,168	19.9%
\$1,000-1,499	1,813	30.9%
\$1,500 or more	2,598	44.3%
Total	5,866	100.0%

Table 14: Units at Risk of Conversion

Project Name, Address & Telephone Number	Address	Types of Project-Based Govt. Assistance	Earliest Potential Conversion Dates	Total # Units in Project	# of Units Subj. to Conversion	Tenant	Bdrm.	Reported Condition
Carson Gardens Retirement Apts.	21811 So. Main St. Carson, CA 90745	HUD 221 D4	2020	101	101	Senior	1 & 2	Good
El Camino Village Senior Complex	21735 So. Main St. Carson, CA 90745	Housing Authority Funds	2022	45	0	Senior	0,1,2	Poor
Avalon Courtyard Senior Project	22121 So. Avalon Blvd. Carson, CA 90745	Low Income Housing Tax Credits/Housing Authority Funds	2024	92	0	Senior	0,1,2	Very Good
Carson Terraces Senior's	632 E. 219 th Carson, CA 90745	Low Income Housing Tax Credits/Housing Authority Funds	2029	62	0	Seniors	0,1,2	Very Good
Villagio	545 E. Carson St. Carson, CA 90745	Low Income Housing Tax Credits/Housing Authority Funds	2040	148	0	Family	1,2,3,4	Very Good
Grace Manor Apartments	223 rd & Grace Carson, CA 90745	HUD Section 236	2020	38	38	Family	1,2,3	Very Good
Gateway at City Center	708 E. Carson Street	Redevelopment Housing Funds/Housing Authority	2066	85	85	Senior	1	Very Good
Via 425	425 E. Carson Street	Redevelopment Housing Funds/Housing Authority	2067	65	65	Family	1,2,3	Very Good
Magnolia Walk (For Sale Affordable Housing)	2535 E. Carson Street	Housing Authority	2057	12	12	Family	3	Very Good

Source: City of Carson Community Development Department

UNITS AT RISK OF CONVERSION

There are in the city of Carson several low to moderate-income housing projects that have existing affordability controls that are listed in Table 14, comprising the assisted housing inventory for the city. As shown in Table 14, there are two housing developments at-risk of conversion to market rate within the 2014-2020 planning period, and an additional two housing developments at-risk of converting to market rate during the period 2021-2025.

EXISTING AFFORDABLE HOUSING UNITS FINANCED BY THE CARSON HOUSING AUTHORITY (CHA)

The Carson Housing Authority is the redevelopment successor agency for housing. Authorized by City Council in 2012, the CHA's institutional structure is defined below.

The CHA has a financial interest in the following affordable housing properties:

TABLE 15: EXISTING AFFORDABLE HOUSING UNITS FINANCED BY THE CARSON HOUSING AUTHORITY (CHA)				
NAME	ADDRESS	TYPE	# OF UNITS	STATUS
Gateway at City Center	720 Carson St. SE Corner of Avalon & Carson	Senior Affordable (Rental)	86	Waiting list closed. Accepting names for guest list only.
Villagio	555 E. Carson St.	Family/Senior Affordable (Rental)	149	Open waiting list.
Carson Terrace	632 E. 219th St.	Senior Affordable	61	Waiting list.
Avalon Courtyard	22121 Avalon Blvd.	Senior Affordable	91	Open waiting list.
Via 425	425 E Carson St.	Family Affordable (Rental)	65	Closed waiting list.
Arbor Green	21227 Figueroa St	Family Affordable (Rental)	40	Open waiting list.
VIA 425 II	401 E Carson St.	Family Affordable (Rental)	40	Closed waiting list.
VEO	616 E Carson St.	Single Family Residential and Condominiums (For Sale)	23 affordable (129 market rate)	Accepting names for interested home buyers.

SECTION 8 AND VASH VOUCHERS

The Housing Authority of the County of Los Angeles (HACoLA) reports 321 Section 8 Choice Vouchers and 16 VASH vouchers are being utilized in Carson. The HUD-Veterans Affairs Supportive Housing (HUD-VASH) program combines Housing Choice Voucher (HCV) rental assistance for homeless Veterans with case management and clinical services provided by the

Department of Veterans Affairs (VA). The VA provides these services for participating Veterans at VA medical centers (VAMCs) and community-based outreach clinics.

HACoLA reports that a total of 321 households in Carson utilize Section 8 vouchers. Of those 321 households, 71 are Hispanic and 250 are non-Hispanic. The racial breakdown of those 321 households is as follows: 203 Black, 95 White, 15 Asian, six Native Hawaiian/Pacific Islander, and two American Indian. (For HUD purposes, Hispanic ethnicity is not considered a racial category.) The total waiting list for Section 8 vouchers in Carson consists of 463 households.

Section 8 voucher concentrations of 20% to 40% are located in census tract 543100, a predominately African American census tract located in the far northern portion of the city (between California Highway 91 and the northern city border, east of Avalon Boulevard).

Section 8 voucher concentrations of 11.5% to 20.5% are located in census tracts 543903 and 543905. These two census tracts are adjacent to each other, and cover a territory south of Interstate 405 and between Avalon Boulevard and Wilmington Avenue. Census tract 543903 is between 27% and 52% Asian, while census tract 543905 (which includes the Scottsdale Townhouses) is 75% Hispanic.

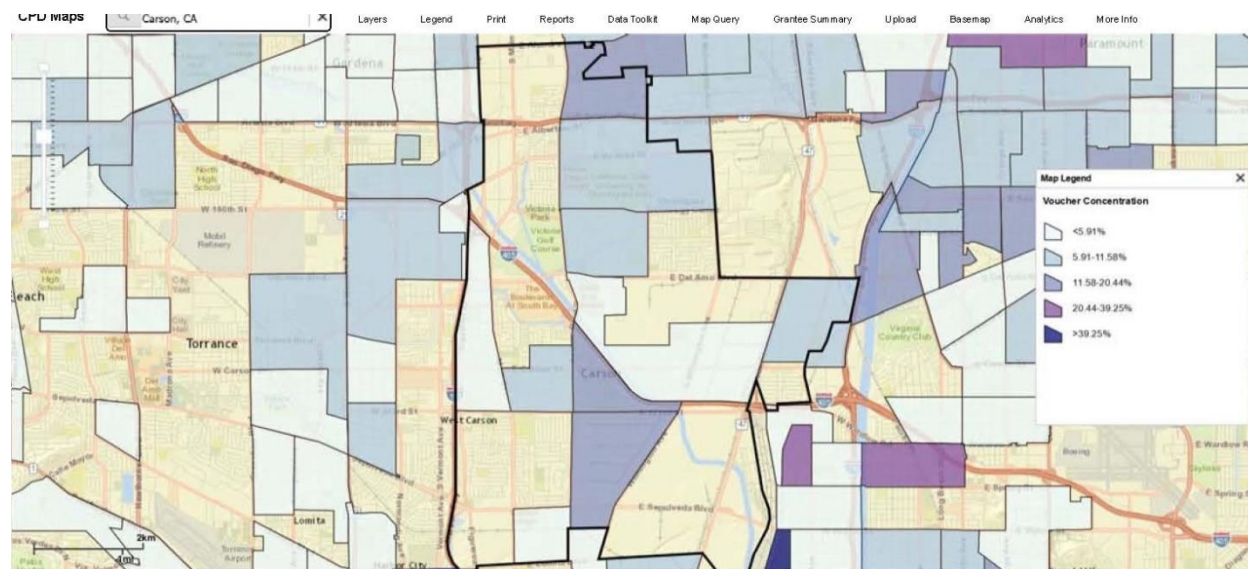


Figure 23: Section 8 Voucher Concentration the City of Carson

AFFORDABLE SINGLE FAMILY HOUSING

In Carson, the current median cost for a home is \$341,200, up from \$176,100 in 2000. Presuming a down payment of 5% (\$17,060); an interest rate of 5.0% and an estimated monthly payment (PI) of \$1,740 makes the current median cost home affordable to a household earning \$74,573, or 104.4% percent of the area's median income (\$71,420) for a family of four. According to Zillow, there are currently 72 homes on the market in Carson that have prices below \$341,000 of a total of 264 homes currently on the market³³. Market availability at an affordable level is currently less than 27% of units available.

The City is largely built out, and the availability of developable land is limited. The number of owner occupied units has fluctuated within a 5.4% range since 2000.

Table 16: Owner Occupied Units & Vacancy Rates 2000-2014			
	2000	2010	2014
Owner Occupied Units	19,205	19,529	18,478
Vacancy Rate	1.1%	2.6%	0.9%

The stagnant nature of housing development contributes to high housing prices and a lack of affordable housing.

Table 17 (following page) displays the housing affordability at various income levels for both rental and ownership housing:

³³ http://www.zillow.com/homes/for_sale/Carson-CA Accessed November 4, 2016

Table 17: Housing Affordability		
% Units affordable to Households earning	Renter	Owner
30% HAMFI	455	No Data
50% HAMFI	1,055	910
80% HAMFI	3,145	2,090
100% HAMFI	No Data	3,250
Total	4,655	6,250

Rental units in the city have grown slowly since 2000 while vacancy rates have moved within a 2.7% range. The growth rate for rental is approximately 1.1% a year since 2000. Vacancy rates below 5% permit owners to establish and maintain higher rents.

Table 18: Rental Units & Vacancy Rates 2000-2014			
Type	2000	2010	2014
Renter Occupied	5,443	5903	6,251
Vacancy Rate	2.6%	4.2%	1.5%

The 3,145 units affordable to those below 80% of HAMFI represent 50% of the available units; the 1,055 units affordable to those below 50% of HAMFI represent 17% of the available units; and the 455 units affordable to those below 30% of HAMFI represent 7% of the available units.

In summary, there is a lack of affordable units across the board. Elevated home values and rents result in much of the housing stock being out of the affordable range for large portions of the population.

HOUSING FOR EXTREMELY LOW INCOME DISABLED

Service providers administering programs targeting housing and services for the extremely low income (<30% of HAMFI) disability populations report the following barriers:

- Single person households relying on Social Security and or Social Security Disability (SSI) face significant difficulties from a complete lack of affordable, accessible housing at their income level. Base Social Security income of \$899 a month plus full SSI (\$1,634) provides the potential income range.
- Rent for a 590 square foot subsidized unit is \$777 to \$940 per month
- Average rents for a single bedroom with shared kitchen and bath are \$500 to \$650 per month.
- Cost of a hotel room at \$175 per week
- These same households must pay a deposit equal to one month's rent to obtain the housing.
- Landlords who rent rooms with shared kitchen and baths are generally exempt from the requirements of Fair Housing law and are not inclined for any reason to provide reasonable accommodation.

Table 19: Affordability for Elderly Disabled			
Base Income	Apartment	Room in House	Hotel Room
Monthly Cost of Unit at High End	\$940	\$650	\$753
Social Security Minimum	\$899	\$899	\$899
Percent of Income	105%	72%	84%
Social Security & SSI	\$1,634	\$1,634	\$1,634
Percent of Income	48%	40%	46%
Monthly Cost of Unit at Low End	\$777	\$500	\$753
Social Security Minimum	\$899	\$899	\$899
Percent of Income	86%	56%	84%
Social Security & SSI	\$1,634	\$1,634	\$1,634
Percent of Income	48%	31%	46%

Table 19 (above) examines the cost burden for disabled and frail elderly populations based on market availability of various types of housing. The city's housing stock does not have sufficient housing targeted at disabled and frail elderly populations.

HOUSING PROBLEMS

By Department of Housing and Urban Development (HUD) standards, there are four criteria by which a household is determined to have a housing problem:

- If a household pays more than 30% of its gross monthly income for housing, it is considered cost burdened. HUD considers households that pay more than 50% of their income for housing costs to be severely cost burdened.
- If a household occupies a unit that lacks a complete kitchen, the unit has a physical defect.

- If a household occupies a unit that lacks complete plumbing facilities, the unit has a physical defect.
- If a household contains more members than the unit has rooms, the unit is overcrowded.

Table 20 displays housing problems for families at or below 30% of area median income in the city.

Table 20: Housing Problems for Households below 30% of AMI			
Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,975	495	205
White	270	80	25
Black/African American	405	40	50
Asian	495	85	75
American Indian, Alaska Native	0	0	0
Pacific Islander	25	0	0
Hispanic/Latino	550	245	50

Housing problems for the 2,675 households between 0% and 30% of area median generally reflect the racial and ethnic makeup of the population Citywide. Nearly 82% of households below 30% of area median income have one or more housing problems.

Households with no or negative income but having no housing problems represent nearly 8% of all households in the 0% to 30% cohort.

Table 21: Housing Problems: 30%-50% of Area Median Income			
Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,320	885	0
White	160	250	0
Black/African American	350	150	0
Asian	375	230	0
American Indian, Alaska Native	0	0	0
Pacific Islander	30	10	0
Hispanic/Latino	1,360	245	0

Housing problems for the 3,205 households between 30% and 50% of area median disproportionately affect Hispanic/Latino households. Over 42% of the Hispanic/Latino households have housing problems. Over 72% of households between 30% and 50% percent of area median income have one or more housing problems.

Table 22: Housing Problems: 50%-80% of Area Median Income			
Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,105	2,150	0
White	290	410	0
Black/African American	760	305	0
Asian	585	400	0
American Indian, Alaska Native	15	0	0
Pacific Islander	105	35	0
Hispanic/Latino	1,270	920	0

Housing problems for the 5,255 households between 50% and 80% of area median disproportionately affect Hispanic/Latino households. Over 24% of the Hispanic/Latino households have housing problems. Over 60% of households between 50% and 80% of area median income have one or more housing problems.

Table 23: Housing Problems: 80%-100% of Area Median Income			
Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,665	1,390	0
White	70	150	0
Black/African American	330	575	0
Asian	590	230	0
American Indian, Alaska Native	0	0	0
Pacific Islander	45	4	0
Hispanic/Latino	520	390	0

Housing problems for the 3,056 households between 80% and 100% of area median reflect the racial and ethnic make-up of the population citywide. Nearly 55% percent of households between 80% and 100% of area median income have one or more housing problems.

In summary, overall 57% of households between 0% and 100% of area median have housing problems. Housing problems for the 14,910 households between 50% and 80% of area median disproportionately affect Hispanic/Latino households. Over 22% of the Hispanic/Latino households have housing problems.

Households who have no or negative income, but none of the other housing problems are 100% concentrated in households between 0% and 30% of area median income.

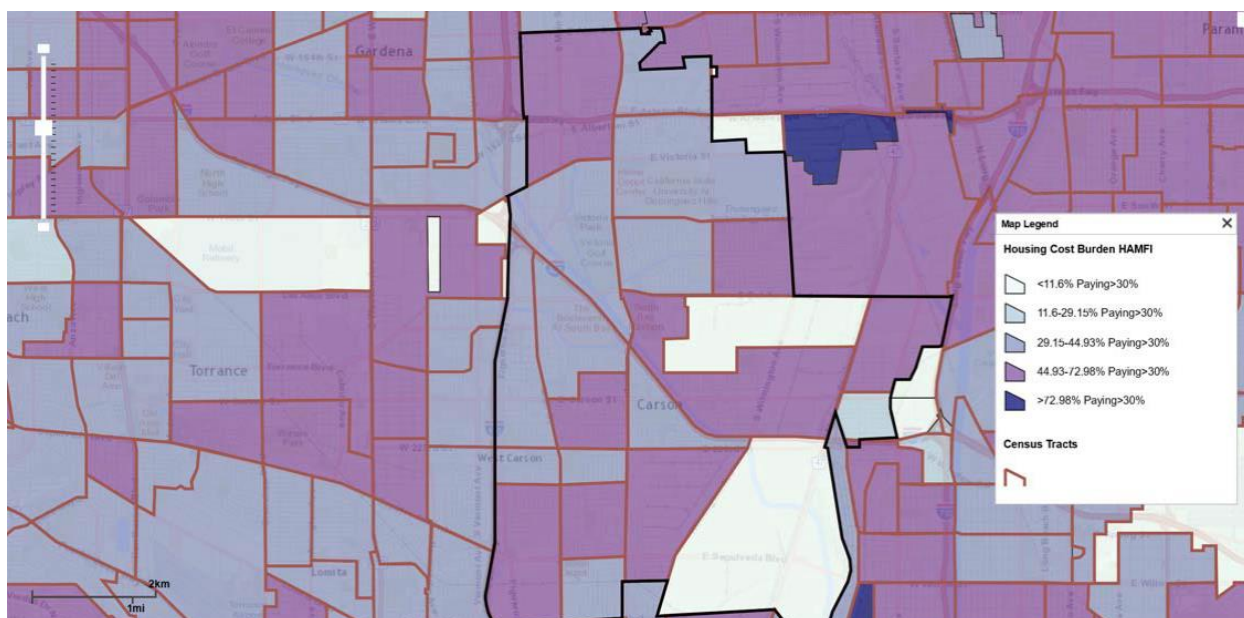


Figure 24: Housing Cost Burden HAMFI City of Carso

SECTION III: Fair Housing Status, 2015

Unlawful discrimination is one of the most blatant impediments to fair housing, and it is therefore important to make efforts to measure the extent to which unlawful discrimination occurs in the housing market. Analyzing complaints brought by those who believe they have been illegally discriminated against can shed light on the barriers to housing choice and accessibility. Though the number of complaints cannot provide a complete picture of the level of discrimination, it can provide a snapshot of some of the barriers that may exist. The prior Analyses of Impediments for Carson can also shed some light on the community's perceptions of the fair housing environment between 1999 and 2003 and between 2003 and 2010.

This section will review both the evidence of unlawful discrimination (in the form of an analysis of discrimination complaints) and the recent fair housing related activities of the City. Another purpose of this section is to describe the current fair housing environment. Subsequent sections of this report will analyze this information for the purpose of identifying current impediments and action steps to minimize the effect of those impediments.

FAIR HOUSING SERVICES

In general, fair housing services include investigating and resolving housing discrimination complaints; discrimination auditing and testing; and education and outreach, such as disseminating fair housing information through written materials, workshops and seminars. Landlord/tenant counseling services involve informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislation, and mediating disputes between landlords and tenants.

Since 2008, the City of Carson has contracted with the Housing Rights Center³⁴ (HRC) to provide fair housing services for the City.

“HRC's mission is to actively support and promote fair housing through education, advocacy and litigation, to the end that all persons have the opportunity to secure the housing they desire and can afford, without discrimination based on their race, color, religion, gender, sexual orientation, gender identity, gender expression, national origin, familial status, marital status, disability, genetic information, ancestry, age, source of income or other characteristics protected by law.”³⁵

Table 24 on the following page summarizes the work of HRC on the City's behalf between 2008 and 2014:

³⁴ Housing Rights Center, Los Angeles Office 3255 Wilshire Blvd., Suite 1150 Los Angeles, CA 90010

³⁵ Housing Rights Center: <http://www.housingrightscenter.org/default.asp?id=6>

TABLE 24: Housing Rights Center Report of Fair Housing Complaints 2008 - 2014

	FY 07/08	FY 08/09	FY 09/10	FY 10/11	FY 11/12	FY 12/13	FY 13/14	Total
Direct Services								
General Housing	139	153	162	144	119	94	146	957
Discrimination Complaints	14	12	9	10	12	14	5	76
Total	153	165	171	154	131	108	151	1033
Discrimination Complaint Outcomes								
Sustains Allegation	2	4	1	3	2	2	4	18
Inconclusive Evidence	2			2	4	3		11
No Evidence of Disc.								0
Counseled	10	8	7	4	6	5	1	41
Referred			1	1		4		6
Pending								0
Total	14	12	9	10	12	14	5	76
Case Dispositions								
Successful Conciliation	2	2	1	2	1	2	4	14
No Enforcement Possible	2	1		3	4	3		13
Referred to Litigation								0
Client Withdrew					1			1
Referred to DFEH		1						1
Counseled	10	8	7	4	6	5	1	41
Referred			1	1		4		6
Pending								0
Total	14	12	9	10	12	14	5	76

Specifically, HRC's contract with the City requires HRC to provide the following services on behalf of the City:

The fair housing counseling program shall consist of at least the following three programs:

- A. Landlord and Tenant Housing Vacancy Program Services provided under the direction of the landlord-tenant counselors.
 - a. Counseling and mediation to landlords and tenants.
 - b. Referrals to appropriate agencies.
- B. Education and Outreach Program. The services provided under this program, among other services, include:

-
- a. Conduct fair housing workshops at City and County libraries and other community organizations;
 - b. Distribution of public education publications in English and Spanish, and other languages as necessary;
 - c. Preparation and distribution news releases to the print media;
 - d. Distribution of legal information and training for landlords, managers, owners, and Realtors;
 - e. Presentations to the community and to city governments, community organizations, sponsoring an annual poster contest, and other services on a need or request basis.
- C. Discrimination Program: (The program is staffed by a full-time Discrimination Housing Coordinator and a part-time Assistant Housing Coordinator).
- a. Each case is thoroughly investigated and complainant advised of all findings, including referrals to private attorneys, HUD, DOJ, DFEH, small claims court, or to the foundation for conciliation.
 - b. Statistical information is maintained in a specially designed program to generate monthly and quarterly reports, including case number, allegation, origin and date of complaint, ethnicity, income level and female head of household status.
 - c. Case files are reviewed on a weekly basis by the Executive Director for substance and effectiveness, and on an as-needed basis by the Board of Directors.³⁶

³⁶ Contract between the Housing Rights Center and the City of Carson; 2015; page 2

COMPLAINTS OF UNLAWFUL DISCRIMINATION

Between 2010 and 2014 the Housing Rights Center (HRC), as Fair Housing contractor to the City, received fifty-five (55) inquiries regarding fair housing. Of the inquiries HRC received twenty-six (26) Fair Housing allegations or complaints.

Fair Housing complaints' in the period 2010 through 2014 broke down as follows:

Table 25: Carson Complaints	
2010-2014	
Complaint	Number of Complaints
Race	3
Sex	0
Family Status	2
Disability	18
Religion	1
Color	0
National Origin	2
Total	26

Disability complaints constituted 62.2% of all allegations, followed by race complaints at 11.5% of all allegations, and familial status and national origin tied at 7.7% each.

It can be extremely difficult to detect unlawful discrimination, as an individual home-seeker, and the resolution of these complaints, following investigation, is also important to consider. The following are the definitions utilized:

Administrative Closure---Action taken as a result of a judicial proceeding, lack of jurisdiction due to untimely filing, inability to identify a respondent or locate a complainant, or if a complainant fails to cooperate.

Conciliation—Parties meet to work out a resolution. Meeting is generally initiated by the equivalent agency (HRC) or HUD.

Withdrawal/Relief—Situation where the complainant wishes to withdraw without relief or there is relief granted following a resolution between the parties.

No Reasonable Cause—Although there may have been an action taken that appears to be discriminatory under the Fair Housing Law, there is not sufficient evidence uncovered as a result of investigation, to prove the action was in fact discrimination, or in other words, one of “Reasonable Cause” to transfer to the United States Department of Justice, District Judge, or the HUD Administrative Law Judge for a judicial ruling.

Reasonable Cause—As a result of investigation, that may also be considered in a conciliation or other attempted resolution action; there is sufficient evidence or “Reasonable Cause” to present the case to the (DOJ) District Judge or the HUD (ALJ), for a judicial ruling.

Table 26 on the following page presents the outcome of cases undertaken during the period 2010-2014.

Table 26: Carson Outcomes 2010-2014	Number
Reasonable Cause Findings	14
No Reasonable Cause Findings	12
Administrative and Other Closures	0
Pending (December 31 st , 2014)	0
Total	26

All 14 of the Cause closures were conciliated, settled, or withdrawn after resolution. There were no cases pending as of December 31, 2014.

CITY OF CARSON PROGRESS IN DEALING WITH IMPEDIMENTS 1997-2014

In total, the City has twenty-six (26) Impediments and Strategies carried forward to the 2015 AI. The Impediments are provided by number followed by (year) first identified, and are followed by Strategies and Activities related to the impediment:

Impediment #1 (1997): High level of segregation of Blacks in the northern part of the City. There is a variety of direct and indirect evidence that suggests that Blacks do not get the same opportunities to purchase homes in parts of Carson as other prospective purchasers enjoy, and

Other racial groups are often not shown housing in the predominantly Black portions of Carson.

Strategies:

1. Develop a regional strategy on real estate steering issues and a capacity for testing in the homeowner market.

-
2. Use full-application testing more widely to prove and measure discrimination.
 3. Develop litigation-related activities.
 4. Re-examine outreach activities.

Activities:

1. **Develop a regional strategy on real estate steering issues:** No progress was made by the City during the 1997-2014 reporting period. The strategy is carried forward to the 2015 AI. **And (also develop) a capacity for testing in the homeowner market:** In 1999 the City hired the Fair Housing Institute to conduct a series of fair housing surveys and to complete market tests for the homeowner market. The first survey and testing were completed in June 1999, increasing the City's capacity for testing in the homeowner and rental market. An additional study was completed in 2001-2002 by the Westside Fair Housing Council. The studies were not reported in the 2003 or 2010 AI.
2. **Use full-application testing more widely to prove and measure discrimination:** In 1999 the City hired the Fair Housing Institute ("the Institute") to complete market tests for the rental and homeowner market, the results of which were received by the City on June 7, 1999. An additional study was completed in 2001-2002 by the Westside Fair Housing Council. The study and the results were not reported in the 2003 or the 2010 AI.

The City initially determined that the **Develop a regional strategy on real estate steering issues** impediment is beyond the physical and fiscal capacity of the City to undertake.

The remaining impediments and strategies are carried forward to the 2015 Impediments and closed as having been accomplished as evidenced above.

Impediment #2 (1997): Limited number of lending opportunities for minorities as opposed to Whites in the City.

Strategies: Follow up on the 1978 study of lending patterns.

Activities: No activities were reported in the AIs of 2003 or 2010. The impediment is carried forward to the 2015 Impediments.

Impediment #3 (1997) Illegal practices by real estate industry personnel with respect to Hispanics.

Strategies:

1. Investigate the activities of unlicensed brokers and unauthorized practices that are targeted at Hispanic homebuyers.
2. Conduct functional cost analysis of specific functions and set priorities.
3. Improve monitoring methods.

Activities: None during the 1997-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

2003 Analysis of Impediments to Fair Housing

Impediment #1 (2003): Hispanics, Asian/Pacific Islanders, and Whites tend to be dispersed throughout the central and southern parts of Carson while Blacks tend to be concentrated in northern Carson. Additionally, tracts where Blacks are the majority tend to be more homogeneous whereas tracts in which Hispanics are the majority tend to be more ethnically diverse.

Strategies: Possibly through a separate auditing contract, work with the Housing Rights Center (HRC) to determine if steering or other discriminatory practices are contributing to the concentration of Blacks in the North and Hispanics, Asians and Whites in the central and southern sectors of Carson.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #2 (2003): Although Asian/Pacific Islanders, on a whole, have higher incomes than Whites, Whites are more likely to own their own homes. Hispanics' and Blacks' income appropriately match their likelihood of owning a home.

Strategies:

1. Work with HRC to focus fair housing outreach efforts to the Asian population in Carson and;
2. Work with Carson lenders to focus outreach efforts to the Asian population.

Activities: None during the 2003-2014 reporting period. The strategy is carried forward to the 2015 Impediments.

Impediment #3 (2003): There is some evidence of "redlining." The data indicates that as the minority population percentage at the census tract level increases, the loan approval rates decrease (from 55% to 48%) and the denial rates increase (from 21% to 25%).

Strategies: Work with HRC to conduct fair housing lending training sessions for Carson lenders.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #4 (2003)

There is slight evidence of racial approval gaps between Whites and Hispanic applicants. More specifically, the data shows that in the higher income categories, Whites have higher approval rates and lower denial rates than Hispanics and African Americans, suggesting that the gaps favoring White applicants seem to arise largely in the \$60,000 to \$90,000 income range.

Strategies: Work with HRC to promote HRC's "Don't Borrow Trouble" Hotline, which assists residents with potential predatory lending problems.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #5 (2003)

The data shows that for Commercial Bank loans, White applications have lower denial rates than Hispanic and African American applicants. But the pattern was reversed for loans through Savings and Loans institutions, where Hispanics had much higher approval rates than Whites.

Strategies:

1. Work with HRC to conduct fair housing lending training sessions for Carson lenders.
2. Work with HRC to distribute fair housing information to local lenders.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #6 (2003): Asian American applicants constitute a small percentage of all loan applications in Carson (17% for the home purchase loan market and 14% of the refinancing loan market respectively). This is significant given the growing number of Asian Americans in the city of Carson.

Strategies: The City will encourage Carson lending institutions to conduct outreach to the Asian community, including the distribution of materials translated into selected Asian languages.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #7 (2003): Zoning Ordinance 9122.5 Child Day Care - CMC 9122.5, which addresses home-based day care centers, conflicts with state law, which explicitly permits licensed in home day care in multiple dwelling units to provide for the number of children for which the day care is licensed. This conflict limits the availability to maintain profitability by restricting the number of children in a licensed day care home

below the permissible limits. Accordingly, CMC 9122.5 conflicts with state and federal fair housing laws' prohibition against discrimination based on familial status in that it burdens the rights of individuals who have care and custody of minor children.

Strategy: The number of children restriction should be eliminated from 9122.5. The code should be revised to state that licensed family day care homes may operate in multiple dwelling units within the restrictions of the state licensing requirements found in the Health & Safety Code.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #8 (2003)

1. Lack of References to Accessibility and Accommodations: 9126.9 - Design Overlay for Condominium Developments.
2. Part 7, Division 3 (Elements of Procedures).
3. Zoning Ordinance 9128.17 Declarations of Covenants, Conditions, and Restrictions (paragraph 3).
4. Chapter 7, Sections 5700 - 5714 - Abatement of Nuisances.
5. 9128.54 Development Standards for Multiple Family Dwellings - Off-street parking must be provided for in accordance with CMC 9162.21.

Strategies:

1. Each of these provisions should include a reference to the Fair employment and Housing Act (FEHA) and the availability of reasonable accommodations for the disabled.
2. Reference should also be made to Part 20 of the United States Code of Regulations, directing readers to the provisions regarding the required number of disabled spaces.

Activities: None during the 2003-2014 reporting period. The impediments are carried forward to the 2015 Impediments.

Impediment #9 (2003): Residential Property Report Ordinance - City of Carson Ordinance Number 99-1155, effective July 1, 1999, requires a residential property report for all residential property sold, with certain exceptions. One exception is for spousal transfers, which could be viewed as a violation of the FEHA prohibition against differential treatment based on marital status. Unmarried residents who transfer property would be subject to the reporting requirements, while married individuals would not. This constitutes differential treatment based on marital status, in this instance, favoring married couples over unmarried couples and individuals.

Strategies: If this distinction serves a legitimate government interest, a finding should be made to that effect. Otherwise, if no legitimate government interest is served, the distinction should be eliminated.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #10 (2003): Housing Element, Section I, Goal 4 at page I-8 - The Housing Element makes reference to fair housing problems identified in a 1999 audit, but does not identify the groups that have experienced differential treatment. Moreover, the Element refers to but does not specify the policy changes that the City plans to implement to address the problem. The Housing Element was approved by the California Department of Housing and Community Development, thus, no changes are required. However, a more detailed explanation of the fair housing issues that face the City coupled with concrete plans to address the problems would be useful in the future Housing Elements.

Strategies:

1. Identify with specificity the protected groups who experienced differential treatment in the 1999 audit.

-
2. Explain the City's plan to educate its residents, including housing providers, buyers, tenants, and prospective tenants regarding fair housing rights and responsibilities.
 3. **Activities:** None during the 2003-2014 reporting period. The impediments are carried forward to the 2015 Impediments.

Impediment #11 (2003): Housing Element, Section III, Definition of "Disabled Person" - The Housing Element uses the federal definition of "disabled person" rather than the state definition. The federal definition reads, "Any individual who has a physical or mental impairment which substantially limits one or more major life activities . . ." The State of California Fair Employment and Housing Act ("FEHA") eliminates the words, "substantially" from its definition of "disabled person," thus affording its protections to wider range of disabled persons. Because the FEHA offers residents greater protection than the federal standard, the state standard governs.

Strategies: Substitute the FEHA definition of "disabled person" in place of the federal definition.

Activities: None during the 2003-2014 reporting period. The impediments are carried forward to the 2015 Impediments.

Impediment #12 (2003): Housing Element, Section VI, Parking Requirements.

Strategy: This section should include reference to the need for accessible parking spaces in accordance with the United States Code of Federal Regulations, Part 20.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #13 (2003): The most prevalent form of discrimination in mobile home parks and rental housing is familial status discrimination. Thirty-one percent (31%) of rental housing respondents reported that they had experienced this form of discrimination while thirty-eight percent (37.5%) of mobile home park respondents reported having experience familial status discrimination.

Strategy: The City should work with HRC to distribute multilingual fair housing informational materials to mobile home owners, managers, and residents.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #14 (2003): There is a high overall rate of discrimination in mobile home parks. Twenty-Five percent (25%) of mobile home park respondents stated they had experienced discrimination by park management.

Strategy: Work with HRC to conduct annual mobile home fair housing training sessions.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #15 (2003): The majority of Carson residents and social service agencies are not aware of fair housing laws and that they exist to provide residents protection against housing discrimination. More than fifty percent (52%) of respondents stated they had never heard of the fair housing laws.

Strategies:

1. The City should include a description of fair housing services available to residents and provide a link to HRC (www.hrc-la.org) on the City's website;
2. Work with HRC to explore alternate and more popular locations for HRC's semi-monthly fair housing clinics in the City;
3. Work with HRC to advertise the semi-monthly clinics;
4. Work with HRC to conduct fair housing information presentations to Carson social service agencies.

Activities: It had been indicated that none of the above-indicated strategies had been implemented during the 2003–2014 reporting period, and as a result, the impediment was carried forward to the 2015 Impediments. However, the City has actually implemented some of the above-indicated strategies, as follows:

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- The City currently provides a link to HRC on the City's website, and also uses the City website to advertise HRC's services, particularly its Fair Housing Walk-In Clinics. The City also distributes flyers at City Hall and at the Congresswoman Juanita Millender-McDonald Community Center regarding HRC's services and the Walk-In Clinics.
 - The Carson Fair Housing Walk-In Clinics formerly alternated between City Hall and the Millender-McDonald Community Center. (Other locations where the clinics had taken place were the Carson Farmer's Market, which initially was located in the Community Center parking lot, and shifted to the parking lot at the South Bay Pavilion shopping mall). Because of difficulties in providing a consistent and private location at City Hall, the clinics were shifted to the Community Center on a permanent basis circa May 2015.

Impediment #16 (2003): Although the total number of residents calling their fair housing services provider is low relative to comparable cities, the volume of calls has consistently increased over the past five years. This suggests that as the services provider becomes established in the City, more residents are becoming aware of the available services. It also indicates that fair housing issues continue to be a concern for residents.

Strategies:

1. The City should include a description of fair housing services available to residents and provide a link to HRC (www.hrc-la.org) on the City's website;
2. Work with HRC to advertise the semi-monthly clinics;
3. Work with HRC to conduct fair housing information presentations to Carson social service agencies.

Activities: It had been indicated that none of the above-indicated strategies had been implemented during the 2003–2014 reporting period, and as a result, the impediment was carried forward to the 2015 Impediments. However, the City has actually implemented some of the above-indicated strategies, as follows:

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- The City currently provides a link to HRC on the City's website, and also uses the City website to advertise HRC's services, particularly its Fair Housing Walk-In Clinics. The City also distributes flyers at City Hall and at the Congresswoman Juanita Millender-McDonald Community Center regarding HRC's services and the Walk-In Clinics.
 - The Carson Fair Housing Walk-In Clinics formerly alternated between City Hall and the Millender-McDonald Community Center. (Other locations where the clinics had taken place were the Carson Farmer's Market, which initially was located in the Community Center parking lot, and shifted to the parking lot at the South Bay Pavilion shopping mall). Because of difficulties in providing a consistent and private location at City Hall, the clinics were shifted to the Community Center on a permanent basis circa May 2015.

Impediment #17 (2003): The results of the audit conducted in 1997 are partially inconsistent with the audits conducted in FY 01/01 and 01/02. In 1997, the results of the rental inquiry testing showed a 50% measure of discrimination against African-American testers. But the reverse was found in the more recent audits. The City has been unable to locate the relevant materials for the 2001 or 2002 audit.

Strategy: Work with the Housing Rights Center to explore this discrepancy through annual rental audit studies.

Activities: None during the 2003-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #18 (2003): A comparison of cases filed by Latino residents to the results of the FYI 01/01 and FY 01/02 audits suggest that Latino residents are underreporting incidents of discrimination. The audit showed a pattern of preferential treatment for White testers compared to Latino testers, and a pattern of preferential treatment for African-American testers compared to White testers. However, the number of cases filed by African-American residents is higher than the number of cases filed by Latino residents.

Strategies:

1. Work with HRC to distribute Spanish-language brochures, particularly those aimed at increasing reporting;
2. Work with HRC to conduct targeted outreach to agencies and social service agencies with a diverse clientele.

Activities: It had been indicated that none of the above-indicated strategies had been implemented during the 2003–2014 reporting period, and as a result, the impediment was carried forward to the 2015 Impediments. However, Strategy #1 indicated above has indeed been implemented. Written materials (flyers, brochures, website announcements) regarding HRC’s services are currently distributed in both English and Spanish.

Impediment #19 (2003): Allegations of familial status and national origin discrimination in mobile home parks are a serious fair housing concern. Cases investigated by HRC indicated that in some mobile home parks, there is tension between the residents who have lived there from some time, most of whom are Caucasian seniors, and those who have moved in more recently, many of whom are Latino families with children. In some cases, HRC has found that the managers of the property have also been residents of the parks for many years, and perhaps as a consequence, tend to grant preferential treatment to the seniors and enforce more restrictive rules against the Latino families.

Strategy: Work with HRC to conduct targeted outreach at mobile home parks, including fair housing presentations and training sessions for owners and managers.

Activities: None during the 2003–2014 reporting period. The impediment is carried forward to the 2015 Impediments.

2010 Analysis of Impediments to Fair Housing

The 2010 AI identified three “findings” and three suggested actions were proposed to address each finding. The findings were:

Impediment #1 (2010): Provide targeted Fair Housing Education and Outreach

Strategy: Address Action by the end of FY 2010-11, and annually thereafter.

Activities: None during the 2010-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #2 (2010): Increase Fair Housing Services to Include Periodic Testing.

Strategy: Address Action by the end of FY 2010-11, and annually thereafter.

Activities: None during the 2010-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

Impediment #3 (2010): Increase Lending Outreach to African Americans and Asians.

Strategy: Address Action by the end of FY 2010-11, and annually thereafter.

Activities: None during the 2010-2014 reporting period. The impediment is carried forward to the 2015 Impediments.

SECTION IV: Public Sector Analysis

Overview

The Fair Housing Act generally prohibits the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that, in effect, limit the ability of minority or the disabled to live in the residence of their choice in the community. If large-lot minimums are prescribed, if a house must contain a certain minimum amount of square feet, or if no multi-family housing or manufactured homes are permitted in an area, the results can exclude persons protected by the Act. If local mandates make it unfeasible to build affordable housing or impose significant obstacles, then a community must affirmatively work toward eliminating this impediment to fair housing choice.

The Fair Housing Acts of 1968 and 1988, as amended, also make it unlawful for municipalities to utilize their governmental authority, including zoning and land use authority, to discriminate against racial minorities or persons with disabilities. Zoning

ordinances segregate uses and make differentiations within each use classifications. While many zoning advocates assert that the primary purpose of zoning and land use regulation is to promote and preserve the character of communities, inclusionary zoning can also promote equality and diversity of living patterns. Unfortunately, zoning and land-use planning measures may also have the effect of excluding lower-income and racial groups.

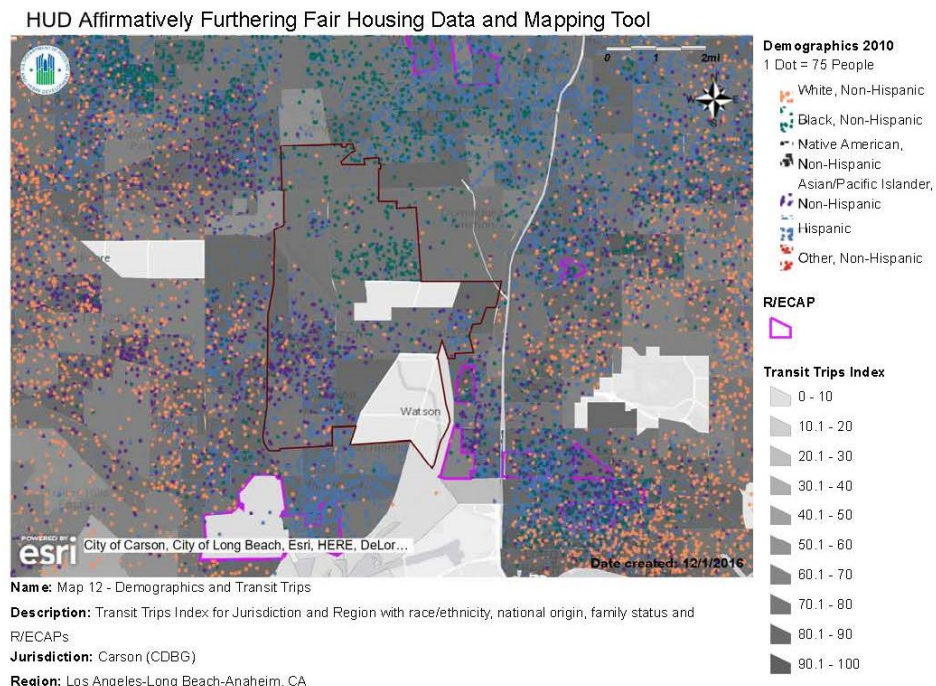
Zoning ordinances aimed at controlling the placement of group homes is one of the most litigated areas of fair housing regulations. Nationally, advocates for the disabled, homeless and special needs groups have filed complaints against restrictive zoning codes that narrowly define “family” for the purpose of limiting the number of non-related individuals occupying a single-family dwelling unit. The ‘group home’ arrangement/environment affords many persons who are disabled the only affordable housing option for residential stability and more independent living. By limiting the definition of “family” and creating burdensome occupancy standards, disabled persons may suffer discriminatory exclusion from prime residential neighborhoods.

Public Transportation

Public transportation information is important to the Analysis of Impediments to Fair Housing, as access to public transportation is of importance to households affected by low incomes and rising housing prices. Public transportation should link lower-income persons, who are often transit-dependent, to major employers where job opportunities exist. Access to employment via public transportation can reduce welfare usage rates and increase housing mobility, which enables residents to locate housing outside of traditionally low- and moderate-income neighborhoods. The lack of a relationship between public transportation, employment opportunities, and affordable housing could impede fair housing choice because persons who depend on public transit will have limited choices regarding places to live. In addition, elderly and disabled persons often rely on public transportation to visit doctors, go shopping, or attend activities at community facilities. Public transportation that provides a link between job

opportunities, public services, and affordable housing helps to ensure that transit-dependent residents have adequate opportunity to access housing, services and jobs.

Figure 25 shows the Transit Trips Index for Carson and the surrounding region with race/ethnicity, national origin, family status and R/ECAPs



The City of Carson is served by the Carson Circuit³⁷, a fixed-route bus service with eight lines serving major city destinations and junctions into regional transit lines. Service is provided under contract and operates Monday through Saturday.

The North/South Shuttle operates along the city's western boundary providing connections to the Carson Circuit and regional transit lines. City staff operates the program Monday through Friday.

³⁷ All bus lines are described at [Carson Circuit](#)

Year Strategic Plan, which addresses housing and community development needs during the period of FY 2015 to 2020. The one-year Action Plan describes the activities to be undertaken during the fiscal year and how the City will use Federal and local resources to accomplish the stated objectives. The annual plan also describes how other community resources will be utilized to address the needs of the homeless, low- to moderate-income individuals and families, and other targeted populations. The 2015-2020 Consolidated Plan lists as the highest need as the “*provision of decent affordable housing*”.³⁸ The Consolidated Plan features programs targeting homeowner rehabilitation (Neighborhood Pride Program); funds for the Scottsdale Townhouses Revitalization; and funds for Fair Housing.

Property Tax Policies

Across the Country, older communities – with the support of the Federal government – have begun to invest in economic and community development programs designed to revitalize their decaying urban cores. The City of Carson is no exception. The foundation upon which this kind of development is built is the ability to achieve fairness in the appraisal process within these neighborhoods. Since the starting point for most bank appraisals is the tax department, discriminatory assessment practices can undermine a homebuyer’s ability to secure mortgage financing in an amount commensurate with the property’s true market value.

Although the Fair Housing Act specifically prohibits the consideration of the racial or ethnic composition of the surrounding neighborhood in arriving at appraised values of homes, no practical means exist to investigate violations of this kind. One reliable approach, however, is to review, periodically, the assessment policies and practices of

³⁸ SP-25 Priority Needs - 91.215(a)(2) Priority Needs

the taxing jurisdiction since their valuations generally comprise the bases for private appraisals.

Property tax assessment discrimination against low-income groups occurs when lower value properties and/or properties in poorer neighborhoods are assessed for property tax purposes at a higher percentage of market value, on average, than other properties in a jurisdiction. Regressive assessments (the tendency to assess lower value properties at a higher percentage of market value than higher value properties) are not uncommon in this country. They result from political pressures, practical problems in assessment administration and the use of certain inappropriate appraisal techniques. Assessments tend to remain relatively rigid at a time when property values are rising in middle income neighborhoods and are declining or remaining at the same level in low-income neighborhoods.

Inequities in property tax assessments are a problem for both lower-income homeowners and low-income tenants. Millions of low-income families own homes. Variations in assessment-to-market value ratios between neighborhoods or between higher and lower value properties can make a difference of several hundred dollars or more each year in an individual homeowner's property tax bill. In addition to causing higher property tax bills, discriminatory high assessment levels can also have an adverse impact upon property values. Buyers are less likely to purchase a property if the property taxes are perceived as too high thereby making the property less attractive and reducing its market value.

Another common inequity is the assessment of multifamily dwellings at a higher ratio to market value than single family dwellings. This type of inequity may be considered a form of discrimination against low-income groups because a higher percentage of low-income than middle-income persons live in multifamily rental dwellings. The requirement to pay a higher assessment is passed on to the tenant in the form of higher rent. Quite often, higher assessments also make it difficult for landlords to maintain

property within the limits of the property's rent structure leading to substandard housing conditions.

Most jurisdictions rely heavily on a market value approach to determining value when conducting their property assessment appraisals. Under this approach, an appraiser compares recent sale prices of comparable properties within the area, – in addition to site visits and a good deal of expert speculation, – in arriving at an appraised value. The limitations inherent in market value approaches are many. Most prominent among them are the cumulative result of decades of discriminatory valuations, especially where the neighborhood is a minority one. Unless some radical re-appraisal process has been conducted within the preceding 10-year period, the present market value approach merely compounds past discrimination.

While the market value approach may operate successfully in some jurisdictions, a substantial percentage of jurisdictions rely primarily on a replacement cost approach in valuing properties. Making determinations of value based on comparable sales is a complex task, which requires considerable exercise of judgment. Assessor's departments, which must appraise every property within a jurisdiction, often do not find it feasible to make the detailed individual analysis required to apply the market value approach.

The City of Carson's property tax assessment follows the requirements of the State of California laws.

Zoning and Site Selection

Zoning may have a positive impact and can help to control the character of the communities that make up a City. In zoning a careful balance must be achieved to avoid promoting barriers to equal housing.

Professor Richard T. Lal, Arizona State University surveyed the view of representative studies concerning the nature of zoning discrimination states³⁹:

“If land-use zoning for the purpose of promoting reason, order and beauty in urban growth management is one side of the coin, so can it be said that exclusion of housing affordable to low and moderate income groups is the other . . . as practiced, zoning and other land-use regulations can diminish the general availability of good quality, low-cost dwellings . . . ”

In considering how zoning might create barriers to fair housing, three key areas were reviewed; these included the following which were selected because of the possible adverse effects they could have on families and persons with disabilities.

- Definitions used for “families” and “group homes”
- Regulations (if any) regarding group homes
- Ability for group homes or other similar type housing to be developed

The City of Carson’s zoning ordinances permit group homes under Community Care Facility⁴⁰; Community Care Facility, Residential⁴¹ and Community Care Facility, Small Family Home⁴²

The City of Carson’s municipal code defines *family* to mean an individual or two or more persons living in a single dwelling unit. *Family* is also defined to mean “the persons living together in a licensed ‘residential facility’ which serves six or fewer

³⁹ Professor Richard T. Lal, Arizona State University, “The Effect of Exclusionary Zoning on Affordable Housing

⁴⁰ Article IX: Planning & Zoning; 9191.114

⁴¹ Article IX: Planning & Zoning; 9191.118

⁴² Article IX: Planning & Zoning; 9191.122

persons, including the licensee, the members of the licensee's family, and persons employed as facility staff⁴³."

Carson has been able to satisfy some of the needs of various special needs residents in the city through the licensing of group homes and other similar facilities that can accommodate special needs housing. For example, there are currently 58 licensed adult residential care facilities in Carson which accommodate six or fewer adults. One exception is the Olivia Isabel Manor adult residential care facility which accommodates 110 residents. HUD refers to those with special needs as individuals with a disabling condition, primarily the existence of a mental or physical challenge that require some form of special housing accommodations in order to live an independent lifestyle.

There are in addition 24 residential care facilities for the elderly in the city, each accommodating six adults, with the exception of the Carson Senior Assisted Living Facility, which accommodates 230 residents. Finally, there are three small-family homes in Carson, each accommodating six persons or less.

The City's land use plan requires that adequate public facilities be available for any development activities. In this context, adequate public facilities generally refers to governmental strategies for assuring that all infrastructure required to meet the service demands of a particular development is available as development occurs. Such strategies can, where permitted by statute, require that the costs for all or a portion of such infrastructure be borne by the developer (ultimately the consumer), and not the general public. Currently, the policy of the City is that all streets, water, sewer and storm drainage facilities within a subdivision, including any required water quality retention ponds, are paid for by the developer.

The ability to provide affordable housing to low-income persons is often enhanced by an entitlement grantee's willingness to assist in defraying the costs of development.

⁴³ Section 1502(a) (1) of the Health and Safety Code

Effective approaches include contributing water, sewer or other infrastructure improvements to projects as development subsidies or waiving impact and other fees. These types of approaches help to reduce development costs and increase affordability allowing developers to serve lower-income households. Carson has historically sought to defray development costs by contributing land, utilizing CDBG for targeted infrastructure and utilizing HOME funds to support affordable housing.

Planning Division, Community Development Department

The Planning Division advises the City Manager, City Council, Planning Commission and other commissions, residents, the business community and the general public on current land use and development issues. The Planning Division is responsible for initiating, coordinating, and implementing the City's General Plan and Zoning Ordinance. The Planning Division processes applications for all types of development projects, including environmental assessment, site and architectural design review and reviewing for consistency with the City's plans and ordinances.

The State of California requires that each City prepare and adopt a comprehensive General Plan. The General Plan acts as a blueprint for improvements and development and addresses several state mandated issues commonly referred to as “elements”. Each City has the ability to incorporate additional elements if the issue is important to the long range development of the community. The Planning Division provides recommendations for updates to the General Plan to address community and state interests for the orderly development of Carson. The City is in the final stages of an update to the General Plan to provide for the future needs of the community over the next 10 to 20 years. The proposed General Plan Update includes the following elements: Land Use; Housing; Safety; Noise; Open Space and Conservation; Parks, Recreation and Human Services; and Air Quality.

Development Fees and Assessments

Development fees and taxes charged by local governments also contribute to the cost of housing. The City assesses various development fees to cover the costs of permit

processing. State law requires that locally-imposed fees not exceed the estimated reasonable costs of providing the service. The fees and exactions required of a development to pay for the public facilities associated with the residential development pose a potential constraint to housing production.

Planning entitlement and building permit fees are collected by the City to defray project entitlement and review costs incurred by the Planning and Building & Safety Divisions. Table 27 on the following page shows the fees charged for basic planning applications.

Table 27: Fee Schedule

**City of Carson
Planning Entitlement Fees**

Fee	Fee Schedule	Fee	Fee Schedule
General Plan Amendment	\$4,500	Development Agreement	\$5,000
Zone Change	\$4,500	Environmental Review	\$1,000
Ordinance Amendment	\$4,500	Specific Plan	\$8,000
Variance	\$2,000	Landscape Plan Check	
Conditional Use Permit	\$750 -\$2,500	2,500-7,500 sq.ft.	\$135
Tentative Tract Map	\$5,500	7,501-15,000 sq.ft.	\$200
Tentative Parcel Map	\$4,000	15,001-30,000 sq.ft	\$410
		30,001 to one acre	\$500

**City of Carson
Building Permit Fees**

Total Valuation	Fee Schedule
\$0 to \$700	\$53.40
\$701 to \$25,000	\$80.04
plus for each additional \$1,000 or fraction in excess of \$1,000	\$20.80
\$25,001 to \$50,000	\$579.60
plus for each additional \$1,000 or fraction in excess of \$25,000	\$16.20
\$50,001 to \$100,000	\$984.60
plus for each additional \$1,000 or fraction in excess of \$50,000	\$12.00
\$100,001 and over	\$1,584.60
plus for each additional \$1,000 or fraction in excess of \$100,000	\$8.00

Building permit fees are based on the total valuation of the property.

The fees in Carson are lower than the surrounding communities reducing the overall cost of development in Carson.

Consolidated Plan Housing Programs

Affordable Housing Needs and Activities

The City of Carson's community development and housing programs are designed to implement various housing assistance strategies that include rehabilitation or

preservation existing housing, including both single family and multifamily. The City's community and neighborhood development activities are designed to:

- Assist single family and multifamily housing preservation and rehabilitation;
- Help low to moderate-income residents acquire needed information, knowledge and skills; and
- Enhance the provision of public services, including fair housing.

Community Development Block Grant Program

The Community Development Block Grant (CDBG) program is used to plan and implement projects that foster revitalization of eligible communities. The primary goal of the program is the development of viable urban communities. Program objectives include the provision of decent housing, a suitable living environment and expanded opportunities principally for low- to moderate-income individuals and families. Carson is an entitlement community and receives its CDBG allocation directly from HUD.

HOME Investment Partnership Program

The HOME Investment Partnership (HOME) program is used to assist in developing affordable housing strategies that address local housing needs. HOME strives to meet both the short-term goal of increasing the supply and availability of affordable housing and the long-term goal of building partnerships between state and local governments and nonprofit housing providers. The City has received funding directly from the State of California Department of Housing and Community Development. The City does not currently have a HOME grant.

Affordable Housing Needs and Activities

The City of Carson's Community Development Department has designed and implemented various housing assistance strategies that include homeowner rehabilitation and housing preservation. The City's community development activities are designed to assist with neighborhood improvement projects, provide public

services, fair housing services, help low- to moderate-income residents acquire needed information, knowledge and skills to build their capacity, and enhance the provision of public services. The majority of these programs are available City wide.

Housing and neighborhood improvement needs and activities are described in the 2015-2020 Consolidated Plan strategic plan.

Housing assistance for AIDS victims is provided through the HUD-funded Housing for Persons with Aids (HOPWA) program.

Assistance to the homeless is provided through the HUD-funded Emergency Solutions Grant (ESG) program and various federally-funded Supportive Housing Program (SHP) programs through the Los Angeles County Continuum of Care, which is led by the Los Angeles Homeless Services Authority (LAHSA).

Through LAHSA, funding, program design, outcomes assessment and technical assistance is provided to more than 100 non-profit partner agencies that assist homeless persons achieve independence and stability in permanent housing. The partner agencies provide a continuum of programs ranging from outreach, access centers, emergency shelters, safe havens, transitional and permanent housing, and prevention, along with the necessary supportive services designed to provide the tools and skills required to attain a stable housing environment⁴⁴.

The Los Angeles County Continuum of Care has established permanent housing for homeless persons with supportive services as the highest priority for the area.

Affordable Housing Priorities

Faced with the reality of limited Federal and local government resources for housing, Carson has been challenged to create a comprehensive, affordable housing program to meet the demands of priority needs households along the entire housing continuum---

⁴⁴ LAHSA Website: Accessed November 1, 2016: <https://www.lahsa.org/about>

rental, ownership, special needs, supportive housing, etc. While the unmet need for rental housing for extremely low income households might suggest that all resources should be devoted to addressing this gap, resources must also be devoted to addressing the housing needs of low and moderate income households that have cost burdens and other housing problems to ensure the housing continuum is intact and flowing.

The Los Angeles Homeless Services Authority (LAHSA), the local Continuum of Care, has established permanent housing for homeless persons with supportive services as the highest priority for the area. Carson has made rehabilitation of low-income housing both single and multifamily, as objectives of the 2010-2015 Consolidated Plan.

Institutional Structure

The Community Development Department of the City of Carson is the lead agency implementing the strategies for addressing housing and community development needs identified as part of its consolidated planning process. The Department, with City Council approval, oversees the allocation of Carson's allocation of CDBG funds and is responsible for maintaining records, overseeing work done using these federal funds and reporting information to HUD concerning the performance of these programs.

The Community Development Department is also responsible for the successor agencies to the former Redevelopment Agency.

The successor agency for housing funds is known as the Carson Housing Authority (CHA). The CHA is a financing arm, not a physical owner of housing. The CHA provides assistance through the use of federal, state and local funds, to partner with developers to create and preserve affordable housing in the City of Carson. Projects assisted by the CHA include, multi-family, senior and for-sale housing⁴⁵.

⁴⁵ City of Carson: <http://ci.carson.ca.us/communitydevelopment/housingauthority.aspx>

The Carson Successor Agency (CSA) manages the development and maintenance of the City's redevelopment funds dedicated to economic development under the aegis of the Community Development Department. A portion of the CSA's loan and grant activities are funded with CDBG with the remainder coming from redevelopment funds

The member agencies of the Los Angeles Homeless Services Authority (LAHSA) work with the City to address the ongoing needs of the homeless and persons with special needs. The City also coordinates its efforts with other local, state and federal institutions to address specific needs or to implement new programs. Affordable housing in the city is provided through a variety of public agencies, nonprofit organizations, private sector developers and lenders. In many cases, individual housing providers focus their efforts on specific income groups, tenure types or on providing certain types of housing and supportive services.

Intergovernmental Cooperation

The City of Carson's Community Development Department is the lead agency for overseeing the development of the Analysis of Impediments. This Department is also responsible for the preparation of the Annual Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER) and CDBG program administration. The Department also administers the City's Housing Authority.

Homeless programs within the city of Carson are administered through the Los Angeles Homeless Services Authority (LAHSA), a joint powers authority created by the City of Los Angeles and Los Angeles County for the purpose of planning, coordinating, and managing resources for homeless programs. LAHSA is the lead agency for developing a CoC strategy for the region to meet the needs for emergency shelters for homeless persons, and to provide services and housing to transition homeless from emergency housing to transitional and permanent housing. For a variety of social and human services, Los Angeles County is divided into eight Service Planning Areas (SPAs). LAHSA utilizes these SPAs in planning, coordinating, and managing resources for homeless programs. The City of Carson is located in SPA 8—South Bay.

The City enjoys a positive relationship with surrounding communities and unincorporated areas of Los Angeles County.

Lead-Based Paint Hazard Reduction

Lead poisoning is one of the worst environmental threats to children in the United States. While anyone exposed to high concentrations of lead can become poisoned, the effects are most pronounced among young children. All children are at higher risk to suffer lead poisoning than adults; but children under age six are even more vulnerable because their nervous systems are still developing. At high levels, lead poisoning can cause convulsions, coma, and even death. Such severe cases of lead poisoning are now extremely rare, but do still occur. At lower levels, observed adverse health effects from lead poisoning in young children include reduced intelligence, reading and learning disabilities, impaired hearing, and slowed growth.

Since the 1970s, restrictions on the use of lead have limited the amount of lead being released into the environment. As a result, national blood lead levels for children under the age of six declined by 75 percent over the 1980s and dropped another 29 percent through the early 1990s. Despite the decline in blood-lead levels over the past decade, recent data show that 900,000 children in the United States still have blood lead levels above 10µg/dL (micrograms of lead per deciliter of whole blood). These levels are unacceptable according to the Centers for Disease Control and Prevention (CDC), which lowered blood lead intervention levels for young children from 25µg/dL to 10µg/dL in 1991. Many of these lead-poisoned children live in low-income families and in old homes with heavy concentrations of lead-based paint. The CDC identified the two most important remaining sources of lead hazards to be deteriorated lead-based paint in housing built before 1978 and urban soil and dust contaminated by past emissions of leaded gasoline.

The national goal for blood lead levels among children ages six months to five years is to limit elevations above 15µg/dL to no more than 300,000 exposures per year and to entirely eliminate elevations above 25µg/dL.

Risk of Lead-Based Paint Hazard

Table 28: Lead Based Paint				
Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total number of units built before 1980	15,816	84%	4,759	79%
Housing units built before 1980 with children present	465	2%	330	5%

The data for houses built before 1980 indicates a high likelihood of lead based paint in 84% of the owner occupied units in the city. The City undertakes the limited rehabilitation and comprehensive rehabilitation of housing units (many of which were constructed prior to 1978), painted surfaces will be disturbed as part of this process. As such, the City is required to incorporate lead-based paint hazard evaluation, approved remediation/reduction strategies and clearance requirements for all housing structures built before 1978.

To reduce the potential for adverse health effects attributable to the rehabilitation of deteriorated lead-based paint surfaces, the City provides educational material. All customers receiving housing rehabilitation assistance from the city are informed about the potential health hazards posed by the presence of deteriorated lead-based paint, which includes information about protecting their families from this hazardous substance.

In addition, Project Managers who oversee rehabilitation projects are trained to incorporate proper hazard reduction techniques into the treatment of lead-based paint. Instead of performing lead hazard evaluations on properties proposed for rehabilitation, it is City's policy to automatically presume that lead-based paint and/or lead-based paint hazards are present when the housing was built before 1978. Visual assessment, stabilization and standard treatment methodologies are employed to achieve clearance

for each comprehensive rehabilitation project. The City will conduct one of the following lead hazard reduction methods as routine to rehabilitation activity:

- If interim controls are required, conduct standard treatments in lieu of interim controls on all applicable surfaces, including soil, to control lead based paint hazards that may be present.
- If abatement is required, abate all applicable surfaces, including soil, to control lead based paint hazards that may be present.

The City currently provides funding for lead-based paint assessment and remediation through the Neighborhood Pride Program (NPP). The NPP is designed to assist low-and moderate-income owners of single-family detached dwellings and mobile homes with the preservation of decent, safe and sanitary housing. The NPP corrects hazardous structural conditions, makes improvements considered necessary to eliminate blight, promotes the construction of healthy, sustainable and resource-efficient housing, improves disabled access, and corrects buildings, and health and safety/code violations.

SECTION V: Fair Housing and Carson's Private Sector

Homeownership rates are important to a community's financial well-being. Prospective homebuyers expect to have access to mortgage credit; and home ownership programs must be available without regard to discrimination, income, or profession. To truly live up to fair housing laws, all persons must have the ability to live where they want and can afford.

Access to mortgage credit enables residents to own their homes, and access to home improvement loans allows them to keep older houses in good condition. Access to refinancing loans allows homeowners to make use of the equity in their home for other expenses. Mortgage credit, home improvement loans, and refinancing loans together keep neighborhoods attractive and keep residents vested in their communities⁴⁶.

Lenders in Carson

Poor lending performance results in various long-term and far ranging community problems. Of these, disinvestment is probably the most troubling. Disinvestment in Carson by its lenders would reduce housing finance options for borrowers and weaken competition in the mortgage market for low-moderate income neighborhoods. High mortgage costs, less favorable mortgage loan terms, deteriorating neighborhoods, reduced opportunities for home ownership, reduced opportunities for home improvement and the lack of affordable housing are only a few of the consequences of inadequate lending performance. Financial decay in the business sector as well as in the private sector is also a result of disinvestment in the form of business relocation, closure, and bankruptcy. Full service local lenders that have traditionally served residents and businesses are one of the main elements that keep neighborhoods stable.

Significant changes have and are occurring in the lending market not only in Carson but throughout the United States. The number and type of lenders have changed over the

⁴⁶ Profile of Lima, Ohio, Federal Reserve Bank of Cleveland, Fall 2000

last ten years, and many local lenders have been bought by national lenders. These national lending institutions are becoming increasingly more active locally, as their market share grows yearly.

The Great Recession of 2008-2010 laid bare the problems in the sub-prime mortgage market. Many families lost their homes and underwent foreclosure during this period. The overall changes in the market caused a reduction in home ownership. Citywide from 2000, the City's homeownership rate was 77.9%. The rate decreased to 76.2% in 2010, then fell further to 74.7% by 2014⁴⁷. In response to the foreclosures, the City established the Carson Foreclosure Prevention Awareness Initiative (CFPAI), a campaign created to raise awareness of existing options for those at risk of foreclosure, and provides tips to encourage smart decisions that may help prevent foreclosure in the future.

There are approximately 395 financial institutions with a home or branch office in the city. The advent of online banking increases the number of available lending banks with no direct ties to the community.

While the physical presence of financial institutions in communities facilitates relationships with banks and the location of these institutions is a primary concern for a community, the advent of online banking has increased both the choice of mortgage products and the overall competitiveness in the lending industry.

Areas left without branches or with access to only ATM machines must find alternative sources for services (such as on-line payment services, check cashing businesses or finance companies), which can be more expensive than traditional financial institutions or credit unions.

⁴⁷ SELECTED HOUSING CHARACTERISTICS 2010-2014 American Community Survey 5-Year Estimates

According to HUD's Subprime Lender criteria, 8.3% of the lenders active in 2008 in the city of Carson were subprime lenders. In 2013, 7.9% of the lenders active in 2013 in Carson were subprime lenders. Generally located outside the state, their subprime lending services are most often sought electronically through on-line brokers. These lenders are easy to access nationwide, making it convenient to shop for loans; and the local absence of top-tier accessibility can make the subprime market generally more attractive for local borrowers.

Lending Activity in Carson, 2010-2014

Originations and Denials

The statistical databases used for this analysis were the 2014 American Community Survey and the Home Mortgage Disclosure Act (HMDA) data for the year 2014. HMDA data on loan activity are reported to document home purchase, refinancing, and home improvement loans. The broadest measure of lending activity is total market activity, which covers all three categories of home loans (purchase, refinance, and home improvement). In this report, if the loan purpose is not specified in the text or figures, the reference is to total market activity.

All Loans

In total, 3,195 applications were made for the purchase, refinance, and home improvement housing activities in 2014. The HMDA breakdown of Loan Purpose indicates the refinancing of existing loans predominated in 2014, representing 64.5% of loans being applied for.

Loan Purpose	Applications	Percent of Applications
Purchase	929	29.1%
Home Improvement	176	5.5%
Re-Finance	2090	65.4%
TOTAL APPLICATIONS	3195	100%

Overall application rates decreased from 2008, and the number of purchase loans for housing decreased 7.7% from 1007 to 929 applications⁴⁹. The high level of re-financing activity is reflective of the low interest rates available in 2014.

Of the applications submitted, Table 30 displays the disposition:

Action Type	Applications	Percent
Originated	1402	48.3%
Approved Not Accepted	128	4.4%
Denied by Financial Institution	410	14.1%
Withdrawn by Applicant	382	13.1%
File Closed for Incompleteness	122	4.2%
Loan Purchased by Institution	460	15.8%
Preapproval denied by financial institution	1	0.0%
Preapproval approved but not accepted	0	0.0%

⁴⁸ 2014 HMDA Data

⁴⁹ Carson Analysis of Impediments to Fair Housing; 2010; pg. 74

⁵⁰ 2014 HMDA Data

The overall denial rate was 14% for all loans in 2014. When adjusted for applications approved but not accepted, applications withdrawn, and files closed for incompleteness, the loan denial rate was 18%.

TABLE 31: Disposition of Loan Applications 2014 ADJUSTED ⁵¹		
Action Type	Applications	Percent
Originated	1402	61.68%
Denied by Financial Institution	410	18.04%
Loan Purchased by Institution	460	20.24%
Preapproval denied by financial institution	1	0.04%
Preapproval approved but not accepted	0	0.0%
TOTALS	2273	100%

The applications represented here are for all loans: conventional, government-backed, refinance for owner-occupied, single-family dwellings.

Multiple reasons can be listed for each mortgage denial. The 410 application denials included 434 reasons for denial.

⁵¹ 2014 HMDA Data

TABLE 32: DENIAL REASONS					
Denial Reason	Reason #1	Reason #2	Reason #3	Total Reasons	Percent
Denial Reason: Debt to Income	112	17	2	131	30.2%
Denial Reason: Employment History	4	1	0	5	1.2%
Denial Reason: Credit History	94	20	0	114	26.3%
Denial Reason: Collateral	42	7	4	53	12.2%
Denial Reason: Insufficient Cash	4	5	1	10	2.3%
Denial Reason: Unverifiable Info	10	9	1	20	4.6%
Denial Reason: Incomplete Application	36	3	0	39	9.0%
Denial Reason: Mortgage Insurance Denied	1	1	0	2	3.3%
Denial Reason: Other	42	14	4	60	13.8%
TOTAL REASONS	345	77	12	434	
TOTAL DENIALS	410				

Denial reasons are concentrated (56.5%) in the two most common credit problems households have, debt to income ratios and credit history. Denial over Collateral at 12.2% of denials is probably related to the refinancing of existing loans where the appraised value in a market with falling median home values would be a major factor.

Purchase Loans

In 2014, there were 76 first mortgage purchase loan denials in 929 mortgage applications submitted for a denial rate of 8.4% citywide. For the 76 loans, 80 denial reasons were cited.

Table 33: Denial Reasons (Purchase Loans Only)		
Reason	Totals	Percent
1. Denial Reason: Debt to Income	26	32.5%
2. Denial Reason: Employment History	1	1.3%
3. Denial Reason: Credit History	17	21.3%
4. Denial Reason: Collateral	16	20.0%
5. Denial Reason: Insufficient Cash	1	1.3%
6. Denial Reason: Unverifiable Info	1	1.3%
7. Denial Reason: Incomplete Application	7	8.8%
8. Denial Reason: Mortgage Insurance Denied	0	0.0%
9. Denial Reason: Other	11	13.8%

The three most common denial reasons are Debt to Income Ratio, Credit History and Collateral, representing 73.8% of denials. The fourth highest denial reason was “other”, representing 13.8% of denials. Because the overwhelming majority of loans were denied for financial reasons, the data does not reveal any specific pattern of discrimination in purchase loans.

Analysis by Race and Ethnicity

Ideally, the percentages of loan applications received would mirror the percent of population of each racial group.

Table 34 on the following page provides a breakdown of loan applications by race.

TABLE 34: APPLICATIONS BY RACE ⁵²		
Applicant Race	Number	Percent
Applicant Race American Indian or Alaska Native	21	0.7%
Applicant Race Asian	478	15.5%
Applicant Race Black or African American	723	23.5%
Applicant Race: Native Hawaiian or Pacific Islander	103	3.3%
Applicant Race White	1054	34.2%
Applicant Race Not provided by Applicant	478	15.5%
Applicant Race Not Applicable	338	11.0%
Applicant Race No Co - Applicant	0	0.0%

When compared to census data, the loan applications are not reflective of population proportions in the city.

TABLE 35: APPLICATIONS TO POPULATION BY RACE COMPARISON		
Applicant Race	Percent of Applicants ⁵³	Percent of Population ⁵⁴
Applicant Race American Indian or Alaska Native	0.7%	0.6%
Applicant Race Asian	15.5%	25.9%
Applicant Race Black or African American	23.5%	20.7%
Applicant Race: Native Hawaiian or Pacific Islander	3.3%	2.2%
Applicant Race White	34.2%	30.8%

⁵² 2014 HMDA Data

⁵³ 2014 HMDA Data

⁵⁴ ACS DEMOGRAPHIC AND HOUSING ESTIMATES: 2010-2014 American Community Survey 5-Year Estimates

Black or African American and White populations apply at a slightly higher rate than their proportion of the population, while Asians apply at a significantly lower rate than their proportion of the population. Because refinancing entails an appraisal of an existing home in a market where home prices are falling, the role of the large proportion of refinancing (65.4%) in the 2014 HMDA data does not lend itself to further interpretation.

TABLE 36: DENIAL BY RACE⁵⁵		
Applicant	Number	Percent of Total
Applicant Race American Indian or Alaska Native	1	0.2%
Applicant Race Asian	79	19.3%
Applicant Race Black or African American	119	29.0%
Applicant Race: Native Hawaiian or Pacific Islander	11	2.7%
Applicant Race White	142	34.6%
Applicant Race Not provided by Applicant	70	17.1%
Applicant Race Not Applicable	1	0.2%
Applicant Race No Co - Applicant	0	0.0%

TABLE 37: APPLICATIONS TO DENIALS TO POPULATION BY RACE COMPARISON			
Applicant Race	Percent of Applicants⁵⁶	Percent of Denials⁵⁷	Percent of Population⁵⁸
Applicant Race American Indian or Alaska Native	0.7%	0.2%	0.6%
Applicant Race Asian	15.5%	19.3%	25.9%
Applicant Race Black or African American	23.5%	29.0%	20.7%
Applicant Race: Native Hawaiian or Pacific Islander	3.3%	2.7%	2.2%
Applicant Race White	34.2%	34.6%	30.8%

⁵⁵ 2014 HMDA Data

⁵⁶ 2014 HMDA Data

⁵⁷ 2014 HMDA Data

⁵⁸ ACS DEMOGRAPHIC AND HOUSING ESTIMATES: 2010-2014 American Community Survey 5-Year Estimates

Comparatively, the percent of denials should mirror the applicant pool and the population. The preceding Table 37 displays the comparison.

For American Indian or Alaska Native and Native Hawaiian or Pacific Islander households, application denial rates are close to percent of applicants and percent of population. More Black or African American households apply than the population would indicate and the denial rate exceeds both percent of population and percent of applicants. Asian applicants are below their percent of population⁵⁹ and denial rates are higher than the percentage of applications. White applicants apply at a higher rate than their population and have denials which reflect the percentage of applicants, but are higher than the population percentage⁶⁰.

Hispanic or Latino households represent 39.6% of the population, represented 24.7% of loan applicants, and represented 4.7% of application denials⁶¹.

Purchase loan applications represent 29.1% of all loan applications. Of the 929 purchase loans applied for, 76 or 8.2%, were denied.

Table 38 on the following page displays the purchase loan denials by race.

⁵⁹ Asian applicants **may** be under represented because of the cultural use of traditional lending circles. Each lending circle is made up of six to ten individuals who collectively create a group loan. Each member makes the same monthly payment, and each month, the total collected is paid out to one member. That continues until each participant has received the loan -- interest and fee-free.

⁶⁰ 2014 HMDA Data

⁶¹ 2014 HMDA Data

TABLE 38: Purchase Loan Denials by Race ⁶²		
Race	Denials	Percent of Denials
1. Applicant Race American Indian or Alaska Native	13	17.3%
2. Applicant Race Asian	19	25.3%
3. Applicant Race Black or African American	3	4.0%
4. Applicant Race: Native Hawaiian or Pacific Islander	31	41.3%
5. Applicant Race White	9	12.0%

Of the 76 purchase loans denied, the denial rate for Native Hawaiian or Pacific Islander populations was significantly higher than the populations' proportion, as was the denial rate for the Asian cohort, and the American Indian or Alaska Native cohort. African American and White populations had lower denial rates than their proportion of the population and total applicants.

Purchase loan denials by ethnicity indicate Hispanic or Latino denials are significantly lower than their proportion of the population of 39.1%.

TABLE 39: Purchase Loan Denials by Ethnicity		
Ethnicity	Denials	Percent of Denials
1. Applicant Ethnicity: Hispanic or Latino	22	29.3%
2. Applicant Ethnicity: Not Hispanic or Latino	42	56.0%
3. Applicant Ethnicity: Information Not Provided	11	14.7%

Analysis by Income

Low- and moderate-income households make up a significant portion of Carson's total households. In 2010, 8% of the population was in poverty, representing 6% of the City's

⁶² 2014 HMDA Data

families⁶³. In 2014, 11.5% of the population was in poverty, representing 8.3% of the city's families⁶⁴.

Because homeownership is the primary way of increasing personal net worth and assets, it is essential for low income households to have access to credit for home loans.

In total 3,195 applications were made for the purchase, refinance, and home improvement housing activities in 2014. The HMDA breakdown of Loan Purpose indicates the refinancing of existing loans predominated in 2014, representing 64.5% of loans being applied for. Purchase loans made up 29.1% of all loans, while home improvement loans made up 5.5% of all loans.

TABLE 40: Purpose of Loan Applications 2014 ⁶⁵		
Loan Purpose	Applications	Percent of Applications
Purchase	929	29.1%
Home Improvement	176	5.5%
Re-Finance	2090	65.4%
TOTAL APPLICATIONS	3195	100%

Total applications by income range indicate that households above 150% of the Federal Financial Institutions Examination Council (FFEIC) metropolitan area median are the largest single group of applicants at 38.5%, followed by low-moderate income applicants at 21.6%, and moderate income applicants at 16% of applicants.

Households above 150% of FFEIC median have the highest denial rate at 36.1%, followed by low-moderate income applicants at 22.1%, and moderate income applicants at 15.9%. The variation between applicants and denials is not significant in these three income cohorts.

⁶³ SELECTED ECONOMIC CHARACTERISTICS 2006-2010 American Community Survey 5-Year Estimates

⁶⁴ SELECTED ECONOMIC CHARACTERISTICS 2009-2014 American Community Survey 5-Year Estimates

⁶⁵ 2014 HMDA Data

TABLE 41: APPLICATIONS AND DENIALS BY INCOME RANGE ⁶⁶					
APPLICATIONS BY INCOME RANGE				DENIALS BY INCOME RANGE	
COHORT	RANGE	TOTAL	PERCENT	TOTAL	PERCENT
Upper Income	>150%	1143	35.8%	152	36.1%
Moderate	120% TO 150%	511	16.0%	67	15.9%
Low-Moderate	80% TO 120%	691	21.6%	93	22.1%
Low	50% TO 80%	313	9.8%	63	15.0%
Very Low	30% TO 50%	84	2.6%	17	4.0%
Extremely Low	<30%	33	1.0%	15	3.6%
Not Available		417	13.1%	14	3.3%
Totals		3192	100.0%	421	100.0%

Low-, very low-, and extremely low-income households combined represent 13.4% of all loan applicants and have a combined denial rate of 22.6%. Denial reasons indicate 91% of denials in the low-, very low-, and extremely low-income cohorts result from debt to income; credit history, or collateral issues, the primary reasons for most loan denials. Significantly, there were no loan denials for employment history or inability to obtain mortgage insurance, and only one denial for lack of cash in 2014. Incomplete applications and unverifiable information made up the balance of low-, very low-, and extremely low-income denials.

Of the 2,271 loans approved in Carson in 2014, 12.1% of approved loans went to low-, very low- and extremely low-income households, while 22.1% of approved loans went to low-moderate income households.

⁶⁶ 2014 HMDA

Alternative Lending Sources

Sub-Prime Lenders

While conventional lenders focus their marketing efforts on consumers with few or no credit blemishes (those with “A” credit), an alternative source of loan funds for consumers with lower credit scores (“B” or “C” credit) is sub-prime lending institutions. While sub-prime lenders simplify the application process and approve loan applications more quickly and more often, these lenders also charge higher interest rates to help mitigate the increased risk in lending to consumers with poorer credit histories. Interestingly, consumers who borrow from sub-prime lenders often do qualify for loans from conventional lenders, but succumb to marketing tactics that encourage them to choose sub-prime institutions over conventional ones. Recent studies by Freddie Mac, the government-sponsored entity that purchases mortgages from lenders and packages them into securities that are sold to investors, show that between 25% and 35% of consumers receiving high cost loans in the sub-prime market qualify for conventional loans. This may be a result of the loss of conventional lenders in the community. Having fewer lenders from which to choose, consumers select those that are conveniently located, even at a higher price.

Payday Lenders

Another source of loans is check cashing or “payday” lenders. Check cashing outlets (such as currency exchanges) cash payroll, government, and personal checks for a fee. Their popularity increases as customers lose access to banks or cannot afford rising fees associated with the inability to maintain minimum balance requirements. Consumers use these outlets for their banking needs and are charged for the services they receive. These businesses offer temporary “payday loans” by accepting a postdated check from the customer, who receives the funds immediately, minus a fee. When used regularly, these fees can equate to double-digit interest rates.

Although these services tend to be located in areas of highest minority and low-income concentration, they are also found in very close proximity to local lenders. Customarily,

however, they fill the void left by banks that do not service an area or have moved from it.

There are at least eighteen payday lenders in the city which offer products ranging from payday loans to short term installment loans, generally, not in excess of \$2,500.⁶⁷

Predatory Lenders

While most sub-prime lenders serve a need by targeting borrowers with sub-par credit histories, some go too far. Those that do are known as predatory lenders. Lending becomes predatory when lenders target specific populations (such as low-income, minority, or elderly homeowners), charge excessive fees, frequently refinance the loan, and often mislead the borrower. Since wealth is often tied to property ownership, this system threatens to deprive residents of their assets by overextending their home's equity and, in some cases, foreclosing on the homes of people who cannot afford the high interest rates and associated fees.

Mainstream financial institutions often unwittingly exclude the very groups targeted by predatory lenders when they market loan products. Additionally, unknowing consumers find themselves at a disadvantage due to a lack of financial savvy. The lending process can be complicated, and often consumers are ill prepared to deal with the large volume of paperwork required for the loan process. Most predatory lenders use their clients' inexperience to their advantage, however, and do not provide quality counseling for consumers seeking their products. They use the consumers' ignorance as their opportunity to reap profits. In the end, borrowers pay substantially higher interest rates and purchase unnecessary credit, life, and disability insurance products.

Sub-prime lenders charge higher rates to compensate for higher risk. While these types of loans and lenders provide an important service to those without opportunities, these

⁶⁷ Suntopia Emergency Loans List: http://www.suntopia.org/carson/ca/payday_loans.php

institutions have been associated with predatory lending nationally and are a source of potential concern locally. When compared to the list of sub-prime lenders provided by HUD, there were 25 sub-prime lenders identified within the city of Carson in 2008. In addition, 30 personal lending sources were identified, including pawnshops, “payday” lenders, personal and title loan establishments, and others. These were located throughout the city, where they serve populations of all income levels. In 2014, 21 sub-prime lenders were identified and over 100 personal lending sources were identified. The exponential increase in personal lending sources falls across all income groups, but traditionally affects low income people disproportionately.

Other Private Entities that Impact Fair Housing Choice

Real Estate and Housing Development Industry

By the fourth quarter of 2008 housing values in Carson had peaked and begun to fall. By early 2010 prices had declined between 6% and 30%, depending on the sub-market within the city, to a median value of \$422,100. By December 2014 the median value of housing in Carson had fallen to \$341,200⁶⁸.

The housing development industry was hit hard by the lack of buyers in all price ranges.

Housing starts for all types of units have increased from 1,069 units permitted in 2008 to 2,062 starts permitted in 2014, indicating that a rebound is underway⁶⁹. The recovery is however, spotty, with the median value of housing having not yet established a “floor” in the city.

Credit criteria for real estate loans of all types have offset the trend toward greater affordability by making it more difficult for buyers to find financing. These factors have had a negative impact on both the real estate and housing development industry.

⁶⁸ 2014 American Community Survey

⁶⁹ Censtats Permits Database: <http://censtats.census.gov/cgi-bin/bldgprmt/bldgdisp.pl>

Homeowners Insurance Industry

Fair housing is about expanding the housing choice for those restricted by economic, social, political, and other forces. The persistence of unfair housing underlies unequal education, unequal access to jobs, unequal income, and redlining. Redlining is an exclusionary practice of real estate agents, insurance companies, and financial institutions that exists when there is a lack of activity by [an] institution to extend credit or coverage to certain urban neighborhoods because of their racial composition; or they are denied because of the year-to-year change in racial composition and the age of structure in a neighborhood regardless of the creditworthiness or insurability of the potential buyer and policy holder or the condition of the property.

Discrimination in the provision of housing insurance has a lasting effect on the vitality of America's neighborhoods. Many traditional industry underwriting practices which may have some legitimate business purpose also adversely affect minorities and minority neighborhoods. While more recent studies have found little evidence of differential treatment of mortgage applications, evidence does suggest that lenders may favor applicants from Community Reinvestment Act (CRA)-protected neighborhoods if they obtain private mortgage insurance (PMI). The requirement of obtaining this additional type of insurance may actually mask lender redlining of low-income and minority neighborhoods. For loan applicants who are not covered by PMI, there is strong evidence that applications for units in low-income neighborhoods are less likely to be approved. Furthermore, these potential homeowners are more likely to be subject to policies that provide more limited coverage in case of a loss, and are likely to pay more for comparable policies.

Data from FFIEC for 2014 indicate that 426 insurance institutions serve the Los Angeles, Glendale, Long Beach MSA⁷⁰.

⁷⁰ FFIEC HMDA Insurance Database 2014

Another critical factor in marketing of insurance is the location of agents. Most of the property insurance policies sold by agents are to insure within neighborhoods in which the agent is located. Studies have shown that the distribution of agent locations was clearly related to the racial composition of neighborhoods. A review of the local on-line maps shows that the insurance companies who provide homeowners insurance have offices primarily along the I-405 corridor of the city. Their distribution makes their services accessible to most households, but those who reside in the north portion of the city must do business with insurance agents outside their neighborhoods.

Internet Advertising

The real estate industry depends largely on marketing through the Internet, thereby eliminating much of the initial direct contact. A review of 30 real estate sites⁷¹ on the Internet revealed no use of human models that would suggest discriminatory advertising. In total, only two of the sites reviewed (6.7%) did not display the HUD equal opportunity logo somewhere on the web page. Websites which offer multiple properties from different owners uniformly include an Equal Opportunity Logo at the bottom of the page.

Print and Media Advertising

In the context of fair housing, discriminatory advertising is any advertising that indicates any preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status or national origin, or an intention to make any such preference, limitation, or discrimination. Overt or tacit discriminatory preferences or limitations are often conveyed through the use of particular words, phrases, or symbols.

In a general review of several local and regional publications carrying ads for housing, no systematic attempt to exclude particular demographic groups was observed.

⁷¹ Major sites reviewed (December 2nd through 10th) included: Homes and Lands; The Real Estate Book; Realtor.com; Zillow; Trulia; Caldwell Banker; RE/MAX; Century 21; Movoto; Redfin; Real Estate Exchange; and Berkshire Hathaway Home Services.

Inconsistency was noted in the display of equal opportunity logos within the housing advertisements reviewed in local and regional newspapers from three separate dates. All of the inconsistencies were minor, with no distinct pattern for any one entity.

The real estate directed publications Homes & Lands, the Real Estate Book and numerous smaller publications all carried the equal opportunity logo on the cover or by the table of contents. Individual ads by real estate brokers within these publications were less consistent, with 27% of the ads having an equal opportunity logo.

An analysis of the apartment listings in the local area Yellow Pages and Yellow Book showed that none of the apartment complexes or purveyors carried a display ad. There was no equal opportunity logo in either publication related to apartment listings, except for three entries for a local non-profit housing provider utilizing federal funds.

The local Apartment Guide does have both the equal opportunity logo and a strong statement affirming equal opportunity in housing: *“All persons are hereby informed that all dwellings advertised are available on an equal opportunity basis.”* In many cases handicap accessibility was advertised utilizing the handicap logo and 28% of the individual ads carried the equal opportunity logo. An analysis of the real estate listings in the local Los Angeles Sentinel revealed that none of the ad listings had an equal opportunity logo. One ad advertised Section 8 availability, and one ad advertised that Section 8 was not accepted.⁷²

An analysis of the classified real estate ads in selected editions of the Los Angeles Times (December 4, December 11, December 18, 2016 issues) revealed 106 ads of 492 ads on average, or 21% of real estate ads, had no equal opportunity logo. Twenty-four ads mentioned “schools nearby” or “family friendly” language positively affirming fair housing by reaching out to one of the protected classes—familial status. Seven firms

⁷² Los Angeles Sentinel of December 1, 2016; page A-12

showed properties with “Section 8 availability” in each issue, therefore reaching out to low-income residents.

The General Public

In the preparation for the Analysis of Impediments, the City has consulted with public and private departments and agencies and social service and non-profit organizations to understand the community’s needs and available resources. Some 90 different entities were contacted and provided with a Stakeholder Survey covering fair housing issues. Of the 90 surveys distributed, 14 were returned. The survey results are presented on the next several pages.

Summary of Surveys

Responses Tallied 1/3/17 Responses Received: 14 (not all respondents answered all questions)

Jurisdiction/Stakeholder Survey for Analysis of Impediments to Fair Housing

The City of Carson Community Development Department (CDD) requests your participation in a brief survey designed to identify impediments to fair housing in the city.

The City, as a recipient of federal funds from the U. S. Department of Housing and Urban Development (HUD), is required to certify that it will affirmatively further fair housing. Your response to this survey is **critical** in CDD's continued receipt of HUD funds that directly benefit your community. Additionally, your input will allow CDD to gain a more qualitative analysis of the knowledge, experiences, opinions and feelings of stakeholders and other interested parties regarding fair housing in the city.

Your organization has been identified as one that is knowledgeable about housing conditions and community programs in the city. **Please ensure that your responses to the survey questions are reflective of the cumulative experiences of your organization**

Thank you in advance for your participation in this survey. Feel free to forward this survey on to any stakeholders we may have missed.

Definitions:

Fair Housing- *Equal and free access to housing choices regardless of race, color, religion, sex, age, handicap or disability, familial status, and national origin.*

Impediments to Fair Housing Choice- *Any actions, omissions or decisions which have the effect of restricting housing choices for the groups defined above, through sale or rental of housing, the financing of housing or the provision of brokerage services.*

1. Name of Organization: _____

2. What is your Organization's primary role from the list below? (Check one)

- A. Local Government 2
- B. Nonprofit 8
- C. Educational 1
- D. Advocacy Group 1
- E. Consulting Firm _____
- F. Self-Employed _____
- G. Property Management _____
- H. Banking/Finance _____
- I. Construction/Development _____
- J. Law/Legal Services _____
- K. Real Estate _____
- L. Other: Residential Community 1

3. What is your organization's familiarity with Fair Housing Laws? (Check one)

- A. Not Familiar 2
- B. Somewhat Familiar 8
- C. Familiar 3
- D. Very Familiar 1
- E. Other: _____

4. Please evaluate the impediments to fair housing facing persons seeking housing in Carson. Check the box that applies based on your organization's experience

	Severe Impediment	Moderate Impediment	Minor Impediment	Not an Impediment	Unsure or Don't Know	Not Applicable
Discrimination against households due to racial or ethnic background		3		6	3	
Discrimination against households due to national origin		2	1	6	3	
Language barriers for persons with limited English proficiency	1	2	1	5	3	

Discrimination against households due to religion			1	9	3	
Discrimination against due to gender		1	2	7	3	
Discrimination against due to familial status		1	2	7	3	
Discrimination against families with children		2	1	7	3	
Discrimination against persons with disabilities	2	1		7	3	
Discrimination against elderly persons	1	2	1	6	3	
	Severe Impediment	Moderate Impediment	Minor Impediment	Not an Impediment	Unsure or Don't Know	Not Applicable
Discrimination against Section 8/Housing Choice Voucher Program participants	1	2		6	4	
Adverse impacts on housing due to domestic violence	1	2	1	4	4	
Lack of knowledge or understanding regarding fair housing	1	2	3	4	3	
Insufficient information and marketing about housing availability	2	2	1	4	4	
Inadequate access to technology (e.g. telephone, internet, etc.)	1	2		6	4	
Inadequate access to transportation	1	2		6	4	
Inadequate access to public and social services	1	2		5	5	

Inadequate access to employment opportunities	2		1	6	4	
Insufficient monitoring and oversight of fair housing activities	2	1		4	6	
NIMBYism (Not In My Backyard) - Neighborhood opposition to affordable housing	2	1		5	4	1
Development standards, building codes, or permits inhibit the development of affordable housing	2	1		5	4	1

5. Please evaluate the severity of local impediments to fair housing service area.

	Very Severe	Somewhat Severe	Not Very Severe	Not an Impediment	Unsure or Don't Know	Not Applicable
The lack of comprehensive fair housing planning	2	3	1	3	4	
Current mechanisms for identifying discrimination are predominantly reactive rather than proactive	1	2	3	1	6	
Inadequate enforcement of fair housing laws	3			3	7	
Inadequate representation of diverse interests (e. g., racial, ethnic, religious, and disabled groups on housing advisory boards, commissions, and committees	2	1		5	5	

Absence of local grievance opportunities	1	1	1	4	5	1
Local land use controls and zoning prohibiting higher density, multifamily housing	2		1	1	6	1
Environmental contamination or health hazards (e. g., lead-based paint or mold) limits the availability of land or readily-available housing stock	1	2	1		7	1
Other (please specify <u>impediment</u> and <u>severity</u> : 1—Need for additional affordable housing units. Funding is scarce. 1—Need more access to rehab, medical, and job creation or job opportunities.			2		1	1

6. Please evaluate the frequency of current practices that are implemented by your jurisdiction to address fair housing impediments.

	Annually	Biannually	Quarterly	Monthly	Weekly	Never
Coordinating between local and regional housing agencies (e. g., housing authorities, local housing departments, and nonprofit organizations, etc.		1	1	3		7

Coordinating between enforcement agencies (e. g., building inspectors, law enforcement, legal departments, etc.)				2		9
Collecting and analyzing fair housing data	1	1	1		1	6
Assessing land use controls and zoning laws	1			2		8
Assessing development standards, building codes, and permits	1				1	9
Adopting a formal process for persons with disabilities to request reasonable accommodation	1	1	1	1	1	6
Adopting Universal Design elements into the local building code	1			1		8
Identifying suitable land sites for affordable housing development	1			1	1	8
Developing housing for large households (e. g., various unit sizes)	1			1	1	8
Increasing housing choice for Section 8/Housing Choice Voucher Program participants (e. g., quality, setting, participation, etc.)		2		1	1	7
Siting affordable housing near access to transportation	1		1	2		7
Siting affordable housing near access to public and social services	1		1	2		7

	Annually	Biannually	Quarterly	Monthly	Weekly	Never
Siting affordable housing near access to employment opportunities	1	1		2		7
Allocating local funds for housing (e. g., state, federal, or private sector)	1			2		8
Applying for other sources of funding for affordable housing (e. g., state, federal, or private sector)	2			2		7
Identifying affordable housing developers and assisting to increase their capacity	1			1	1	7
Identifying cost-effective housing construction companies and builders	1			1	1	8
Assessing property insurance and tax policies	1		1			9
Other (please specify <u>practice</u> and <u>frequency</u>)						2

7. Please evaluate the severity of economic impediments to fair housing in your service area.

	Very Severe	Somewhat Severe	Not Very Severe	Not an Impediment	Unsure or Don't Know	Not Applicable
Inability to secure enough public subsidies to develop affordable housing	5		1	1	5	1
Activities causing housing displacement (e. g., revitalization of neighborhoods, property tax increases, demolition, etc.)	3	1	1	2	5	1

	Very Severe	Somewhat Severe	Not Very Severe	Not an Impediment	Unsure or Don't Know	Not Applicable
Developers with capacity to develop affordable housing are needed	6		1	1	4	1
High costs of construction	5	1		1	5	1
High costs of land suitable for affordable housing development	5	1		1	5	1
Unethical real estate processes (e. g., steering, blockbusting, etc.)	2	2		2	6	1
Shortage of mortgage financing available to low-income households (lack of subsidies/ financial assistance such as down payments and closing costs)	5	1		2	4	1
Unfair lending practices (e. g., excessive promotion of subprime mortgages or predatory lending)	2	2		2	6	1

8. Please evaluate the frequency of current outreach practices that are implemented by your jurisdiction to address fair housing impediments.

	Very Effective	Somewhat Effective	Not at all Effective	Unsure or Don't Know	Not Applicable
Market available housing throughout the community via ethnic newspapers	1	4	2	3	3
Market available housing throughout the community via internet in multiple languages	2	4	1	3	3
Market available housing throughout the community via at in-person meetings at convenient, accessible locations and times.	2	4	1	4	2
Market available housing using techniques to assist the disabled (e. g., visually impaired, hearing impaired, physically disabled,	1	4		6	2

etc.)					
Market available housing and fair housing resources for populations with limited English proficiency	1	3	2	4	3
	Very Effective	Somewhat Effective	Not at all Effective	Unsure or Don't Know	Not Applicable
Appointment of a designated officer to handle requests for reasonable accommodations	2	1		6	4
Partner with nonprofit organizations assisting protected groups (e. g., racial minorities, disabled, elderly, etc.) for outreach	2	4	2	4	1
Education, training, and counseling for tenants and prospective homebuyers	1	3		5	3
Education and training for landlords (e. g., on fair housing marketing/advertising, tenant selection, reasonable accommodation, etc.	1	3	1	4	4
Education and technical training for real estate and mortgage industry professionals	1	2		6	4
Education and training for the public/community at large (<i>One response straddled "somewhat effective" and "not at all effective".</i>)	1	3	1	3	4
Other (Please specify <u>practice</u> and <u>frequency</u>)				1	

9. Has your organization received any complaints of housing discrimination?

(Check one)

Yes

3

No

10

10. If you have answered yes to question 10, check the basis on which complaints were made. Check all that apply:

Age 1
Gender 1
Race 1
National Origin _____
Disability 3
Religion _____
Familial Status _____
Other 1 (please specify) 1—Voucher w/Section 8

(Also: 1 blanket comment "not applicable")

11. Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market? (Check one)

A. Yes 1 If Yes, please specify. 1—Accommodations for the homeless people

B. No 12

12. Are you aware of any questionable practices or barriers to fair housing choice in the real estate market? (Check one)

A. Yes 1 If Yes, please specify. 1—Affordability (credit checks and deposit/ equity requirements)

B. No 12

13. Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry? (Check one)

A. Yes 2 If Yes, please specify. 1—Purchase of mobilehomes; 1—Credit scoring/credit checks are disallowing homeless & families w/tight financials

B. No 11

14. Are you aware of any barriers that limit access of minority populations to serving as representatives on state or local boards, commissions, etc.? (Check one)

A. Yes 1 If Yes, please specify. 1—Unaware of these opportunities

B. No 12

15. Are you aware of any questionable practices or barriers to fair housing choice in any other housing services? (Check one)

A. Yes 1 If Yes, please specify. 1—Strict background checks

B. No 12

16. Please share any additional comments regarding fair housing.

1—Need more affordable housing in the area; 1—Better and more flexible recognition of peculiar cultural practices of minorities.

QUESTIONS 17 -18, WOULD BE INCLUDED ON THE SURVEY FOR SERVICE PROVIDERS AND ADVOCACY GROUPS ONLY NOT ON THE SURVEY FOR JURISDICTIONS:

17. Are you aware of any questionable practices or barriers to fair housing choice in land use policies? (Check one)

A. Yes 0 If Yes, please specify.

B. No 10

18. Are you aware of any questionable practices or barriers to fair housing choice in zoning laws? (Check one)

A. Yes 0 If Yes, please specify.

B. No 10

(End of Survey Questionnaire)

In addition, the City conducted targeted outreach to various target populations and their applicable service providers. During the week of December 5-8, 2016, the City convened a series of focus groups at four community centers in the city and a community-wide meeting to solicit input on the City's fair housing issues.

Summary of Focus Groups

The City provided the opportunity for various interest groups, service providers, advocates, churches, and neighborhood organizations to attend focus groups on fair

housing. The City sent either an e-mail or letter to 128 potential participant organizations and developed and distributed a flyer in English, Spanish and Tagalog. Information on the focus groups was also published on the City's website.

Focus groups were sited at four accessible community centers geographically spread through the City. Each community center hosted a full day of focus groups. Focus groups were not well attended, but information obtained did assist the City in the determination of potential impediments.

Comments obtained were focused on elderly, frail elderly and disabled populations and the difficulty of finding housing for populations at the very low and extremely low income affordability range for disabilities populations. The comments are summarized in the [Housing for Extremely Low Income Disabled](#) discussion earlier in this report.

Summary of Community Meeting

The City held an open community meeting for community members, advocates, churches, and neighborhood organizations on December 7, 2016 at the Congresswoman Juanita Millender-McDonald Community Center. The City sent an e-mail or letter to all individuals and/or organizations on the City's mailing list. The City developed and distributed a flyer in English, Spanish and Tagalog, and provided translation services for Spanish and Tagalog at the meeting. Information on the Community Meeting was also published on the City's website.

Comments obtained were focused on reasonable accommodations for persons with disabilities.

Section VI: Conclusions and Recommendations

This section presents the Fair Housing Analysis Update for the City of Carson 2015-2020 Consolidated Plan. It includes existing impediments to fair housing choice currently being addressed – and the strategies recommended to remedy them. The City's prior Analyses of Impediments were conducted in 1997, 2003 and 2010. This update includes impediments and recommendations that are carried over from the 1997, 2003, and

2010 Analyses. The update is based on available public and private information from the real estate, insurance and banking industries, the local housing authority, the California Department of Fair Employment and Housing (DFEH), the California Department of Insurance, and the San Francisco HUD Office of Fair Housing and Equal Opportunity.

IMPORTANT CONSIDERATIONS

Three key housing related groups in the City—the Community Development Department, the non-profit assistance and development sector and the local housing authority must all work continually with the private sector to promote and explain the requirements of the Fair Housing Act. Local housing providers do receive calls when an alleged violation occurs, and provide information on the Act, and provide guidance on how to lodge a formal complaint. Complaints relative to projects funded with federal dollars are directed to HUD.

Throughout the year, the City and local housing providers must work together to promote fair housing, hold conferences, distribute materials, educate both tenants and landlords, and continually strive to limit the local violations to the Fair Housing Act.

Discussions should be held with the Chamber of Commerce, government officials, Realtors® and individuals regarding discriminatory practices and complaints lodged and resolved successfully through mediation. The more widely distributed resolved complaints are the higher the educational value to the community.

The City should join with Realtors® to disseminate current information on fair housing as training tools for housing industry professionals.

The more stringent credit requirements imposed by the secondary market (FHA, Fannie Mae, etc.) have significantly impacted the ability of households to obtain to obtain a mortgage. The City should continue to encourage lenders to participate in educational workshops on Fair Housing/Equal Opportunity.

One frequent threat to Fair Housing is the development of housing options for special needs populations. In some instances, residents place significant pressure on local elected officials and zoning officers to deny variances, permits, and other approvals.

Implementation of activities should include:

- Encouraging the private sector to disseminate fair housing brochures and flyers throughout their public spaces
- Disseminating fair housing brochures and flyers throughout the community, via conferences, housing fairs, information racks in public facilities, and other methods
- Reviewing proposed policies in the City Housing Element
- Recommending the inclusion of policies allowing for a diversity of housing types and locations
- Reviewing existing zoning and land development policies for possible revisions to permit more affordable housing
- Reviewing successful models for developing new low- and moderate-income housing by other communities and private developers.

Finally, the City should guide the work of fair housing enforcement and outreach strategies. By approaching the issue of fair housing in a comprehensive way, the City will identify the most effective means to achieving compliance and enforcement through outreach, advocacy, investigative services, and testing. All of these efforts contribute to a more educated citizenry relative to increased public awareness and understanding of the issue of fair housing and of the appropriate corrective resources available to residents of the city.

Specifically based upon the current data available, the following are the impediments and strategies that have been identified for the City. The City will document and report

its actions to HUD on the removal of impediments through Annual Reports which are a part of the Consolidated Plan Process.

**Impediment #1: POTENTIAL REAL ESTATE STEERING PRACTICES
(Consolidates and Addresses Prior Impediments)**

- High level of segregation of Blacks in the northern part of the City **(Impediment #1, 1997)**
- Illegal practices by real estate industry personnel with respect to Hispanics **(Impediment #3, 1997)**
- Hispanics, Asian/Pacific Islanders, and Whites tend to be dispersed throughout the central and southern parts of Carson while Blacks tend to be concentrated in northern Carson. Additionally, tracts where Blacks are the majority tend to be more homogeneous whereas tracts where Hispanics are the majority tend to be more ethnically diverse. **(Impediment #1, 2003)**
- The results of the audit conducted in 1997 are partially inconsistent with the audits conducted in FY 01/01 and 01/02. In 1997, the results of the rental inquiry testing showed a 50% measure of discrimination against African-American testers. But the reverse was found in the more recent audits. The City has been unable to locate the relevant materials for the 2001 or 2002 audit. **(Impediment #17, 2003)**
- Increase Fair Housing Services to Include Periodic Testing. **(Impediment #2, 2010)**

Strategy

Develop a regional strategy on real estate steering issues. The City currently uses the Housing Rights Center (HRC) as its fair housing services provider, and this is something which HRC could organize or collaborate. Ideally, this would involve neighboring cities such as Long Beach, Compton, Gardena, and Torrance, Hawthorne, Lomita, and Lawndale. All of these communities are likely to be facing similar issues.

In conjunction with the proposed regional strategy on real estate steering issues, focus a study on steering patterns particular to Carson. This would be carried out by the Housing Rights Center or some other entity.

Increase the use of full-application testing by the Housing Rights Center. The remedy may be as “simple” as including language in the HRC contract directing or mandating (greater) use of full-application testing.

While audit testing is among the components included in HRC’s current contract with the City, it is proposed that the City set more specific targets regarding the number

and frequency of audit tests to be conducted in subsequent contracts, so that audit information remains current.

Develop a plan of action for both the City and HRC based on the results of the audit testing conducted.

Increase the emphasis on litigation activity. To some degree, litigation activity occurs on an as-needed basis. However, the examination of seven years of HRC activity in Carson (Table 24) indicates that there were no cases referred to litigation during that entire timeframe. This may point to a need for a more proactive approach to litigation.

Increase outreach activities. Include specific targets for the number and types of outreach activities to be conducted, and the groups to which the outreach activities are targeted, in the HRC contract. Previously-cited impediments indicate that targeted outreach to the following groups/communities is warranted:

- The Asian community (mentioned in Impediment #2 from 2003 , which also implies a need for targeting to the Pacific Islander community; the Asian community is mentioned in Impediment #3 from 2010 as a target for lending outreach)
- Latino and Spanish-language communities
- The mobilehome park community (park owners as well as residents)
- Carson social service agencies
- Local lenders
- African Americans (mentioned in Impediment #3 from 2010 as a target for outreach from a lending perspective)

Specifically include investigation of unlicensed brokers and unauthorized practices, with an emphasis on any population group that may be targeted, in the Housing Rights Center’s contract. It is also assumed that increased testing activity will reveal such unlicensed brokers and unauthorized tactics.

Impediment #2: REAL ESTATE LENDING PRACTICES (Consolidates and Addresses Prior Impediments)

- Limited number of lending opportunities for minorities as opposed to Whites in the city **(Impediment #2, 1997)**
- Although Asian/Pacific Islanders, as a whole, have higher incomes than Whites, Whites are more likely to own their own homes. Hispanics’ and Blacks’ income appropriately match their likelihood of owning a home. **(Impediment #2, 2003)**
- There is some evidence of “redlining”. The data indicates that as the minority population percentage at the census tract level increases, the loan approval

rates decrease (from 55% to 48%) and the denial rates increase (from 21% to 25%). **(Impediment #3, 2003)**

- There is slight evidence of racial approval gaps between Whites and Hispanic applicants. More specifically, the data shows that in the higher income categories, Whites have higher approval rates and lower denial rates than Hispanics and African Americans, suggesting that the gaps favoring White applicants seem to arise largely in the \$60,000 to \$90,000 income range **(Impediment #4, 2003)**
- The data shows that for Commercial Bank loans, White applications have lower denial rates than Hispanic and African American applicants. But the pattern was reversed for Savings and Loans Banks where Hispanics had much higher approval rates than Whites. **(Impediment #5, 2003)**
- Asian American applicants constitute a small percentage of all loan applications in Carson (17% for the home purchase loan market and 14% of the refinancing loan market respectively). This is significant given the growing number of Asian Americans in the city of Carson. **(Impediment #6, 2003)**
- Provide targeted Fair Housing Education and Outreach **(Impediment #1, 2010)**
- Increase Lending Outreach to African Americans and Asians. **(Impediment #3, 2010)**

Strategy

Commission a new study of lending patterns (either by the Housing Rights Center or some other entity). The previously-referenced 1978 study cannot be found, and given its age and significant changes in the mortgage market, may have little or no relevance to present day conditions. Therefore, the best approach may be to commission a new study and develop a set of recommended actions from it.

Develop focused fair housing outreach activities to the Asian (and, as indicated in the Impediment, the Pacific Islander community). This would be carried out by the Housing Rights Center.

Focus lending outreach to, respectively, the Asian, Pacific Islander, and African American communities. This would likely be a joint effort involving the Housing Rights Center, City staff, and local lenders and incorporate homebuyer education.

Institute a regular sequence of fair housing lending training sessions for Carson lenders. This would be a joint effort involving the Housing Rights Center and City staff.

Impediment #3: AMENDMENTS TO THE CARSON MUNICIPAL CODE (Consolidates and Addresses Prior Impediments)

- Child Day Care – Carson Municipal Code (CMC) Section 9122.5, which addresses home-based day care centers, conflicts with state law, which explicitly permits licensed in home day care in multiple dwelling units to provide for the number of children for which the day care is licensed. This conflict limits the availability to maintain profitability by restricting the number of children in a licensed day care home below the permissible limits. Accordingly, 9122.5 conflicts with state and federal fair housing laws’ prohibition against discrimination based on familial status in that it burdens the rights of individuals who have care and custody of minor children. **(Impediment #7, 2003)**
- 1. Lack of References to Accessibility and Accommodations: (Section) 9126.9 - Design Overlay for Condominium Developments.
- 2. Part 7, Division 3 (Elements of Procedures).
- 3. (Section) 9128.17 Declarations of Covenants, Conditions, and Restrictions (paragraph 3).
- 4. Chapter 7, Sections 5700 - 5714 - Abatement of Nuisances.
- 5. (Section) 9128.54 Development Standards for Multiple Family Dwellings - Off-street parking must be provided for in accordance with (Secion) 9162.21.
(Impediment #8, 2003)
- Residential Property Report Ordinance - City of Carson Ordinance Number 99-1155, effective July 1, 1999, requires a residential property report for all residential property sold, with certain exceptions. One exception is for spousal transfers, which could be viewed as a violation of the FEHA prohibition against differential treatment based on marital status. Unmarried residents who transfer property would be subject to the reporting requirements, while married individuals would not. This constitutes differential treatment based on marital

status, in this instance, favoring married couples over unmarried couples and individuals. **(Impediment #9, 2003)**

- Housing Element, Section I, Goal 4 at page I-8 – The Housing Element makes reference to fair housing problems identified in a 1999 audit, but does not identify the groups that have experienced differential treatment. Moreover, the Element refers to but does not specify the policy changes that the City plans to implement to address the problem. The Housing Element was approved by the California Department of Housing and Community Development, thus, no changes are required. However, a more detailed explanation of the fair housing issues that face the City coupled with concrete plans to address the problems would be useful in the future Housing Elements. **(Impediment #10, 2003)**
- Housing Element, Section III, Definition of “Disabled Person” - The Housing Element uses the federal definition of “disabled person” rather than the state definition. The federal definition reads, “Any individual who has a physical or mental impairment which substantially limits one of more major life activities” The State of California Fair Employment and Housing Act (“FEHA”) eliminates the wording “substantially” from its definition of “disabled person”, thus affording its protections to (a) wider range of disabled persons. Because the FEHA offers residents greater protection than the federal standard, the state standard governs. **(Impediment #11, 2003)**
- Housing Element, Section VI, Parking Requirements. **(Impediment #12, 2003)**

Strategy

Amend Section 9122.5 of the Carson Municipal Code to bring any references to the number of children into alignment with state licensing requirements. The current CMC restrictions are:

- Single-family dwelling: not more than six children exclusive of the children of the resident family, and with an assistant caregiver present, not more than 12 children, including children of the resident family and of the assistant caregiver.
- Multiple dwelling unit: not more than three children including children of the resident family.

With regard to the restrictions of the state licensing requirements, City staff found no references in the Health & Safety Code. However, the California Department of Social Services Family Child Care Home Licensing web page (<http://cclld.ca.gov/PG513.htm>) directs one to Title 22, Division 12, Chapter 3 (Family Child Care Homes) of the Manual of Policies and Procedures. In the Definitions section (where it is noted that the term “Family Child Care” supersedes the term “Family Day Care” as used in previous regulations), limitations on the number of children are outlined as follows:

(A) "Small Family Child Care Home" means a home that provides family child care for up to six children, or for up to eight children if the criteria in Section 102416.5(b) are met.

These capacities include children under age 10 who live in the licensee's home.

(B) "Large Family Child Care Home" means a home that provides family child care for up to 12 children, or for up to 14 children if the criteria in Section 102416.5(c) are met. These capacities include children under age 10 who live in the licensee's home and the assistant provider's children under age 10.

Amend the Municipal Code section governing condominium developments to insert references to accessibility and accommodations pursuant to the provisions of the California Fair Employment and Housing Act. As it currently exists, CMC Section 9126.9 pertains to Site Planning and Design rather than Condominium Developments. It appears that the appropriate section for amendment would be 9128.14 Development Policy, 9128.15 Development Standards, and/or 9128.16 Development Criteria.

Amend Division 3, Elements of Procedure (which is actually part of Chapter 3), to incorporate language regarding reasonable accommodations for the disabled. The “Elements of Procedure” section pertains to procedures employed by the Planning Commission in the conduct of public hearings. Chapter 2.7 of the California Government Code contains language pertaining to notice procedures to the blind, aged, and disabled communities to facilitate their participation.

Amend Section 9128.17 Declarations of Covenants – Conditions and Restrictions to incorporate language regarding accessibility and accommodations. Actually, the third paragraph of that section pertains to Assignment or Conveyance of Private Storage Areas. Perhaps the paragraph for amendment is needed is the next (fourth) paragraph, which pertains to Assignment or Conveyance and Use of Required Off-Street Parking Spaces.

Note:

- The suggested language to Section 9128.54 Development Standards for Multiple-Family Dwellings (that off-street parking must be provided in accordance with CMC Section 9162.21) is currently included in that Section.
- Chapter 7, Sections 5700-5714 of the CMC includes almost all of the Property Maintenance provisions of the Code (the Chapter does include a Section 5715). While this Chapter was cited above, it is open to question whether it constitutes an impediment to fair housing. However, there are three Sections in that Chapter that could perhaps benefit from the sort of amendments regarding disability accommodations that are proposed for the other above-cited impediments:
 - Section 5707, which provides that a person appealing a notice of violation is entitled to a public hearing before the Director of Public Safety;
 - Section 5708, which provides that any person can appeal the public hearing decision of the Director of Public Safety to City Council; and
 - Section 5713, which summarizes the procedures for City Council in conducting that appeal hearing.

Review by City staff (and the City Attorney's Office) of the need for the spousal exemption in the Residential Property Report (RPR) Ordinance. The RPR Ordinance is currently codified in the Carson Municipal Code as Sections 5900 through 5913. Exemptions to the RPR requirements are outlined in Section 5913. The spousal transfer exemption is at 5913 (h): Transfers between spouses resulting from a marriage dissolution, a legal separation decree or from a property settlement incidental to such decree. Another one of the exemptions is at 5913 (g): Transfers between co-owners, which may in itself cover the spousal transfers described in 5913 (h) without constituting differential treatment based on marital status.

Commission a new survey or study to determine if any groups are currently experiencing differential treatment, and the extent of any such differential treatment. This would be carried out by the Housing Rights Center or some other qualified entity. The Housing Element referenced in this instance is the 1998-2005 Element, which in the

cited section does make reference to the Fair Housing Institute's 1999 Fair Housing Survey. That survey specifically identifies Blacks and Latinos as experiencing differential treatment. It also suggests an element of lending discrimination against non-Blacks seeking to purchase in predominantly Black north Carson, but cautions that this is not conclusive. While this issue is not mentioned in subsequent Housing Elements (2006-2014 and 2014-2021), it is an issue that warrants further examination and the development of plans to address problems identified.

As the fair housing issue exists not because the Housing Element in effect at the time (the 1998-2005 Element) references (on page III-9) the definition of "disabled person" contained in Section 104 of the federal Rehabilitation Act of 1973, but that the Carson Municipal Code (in Section 9172.27, Request for Reasonable Accommodation) uses it, amend that section of the Code to incorporate the FEHA language. (It should be noted for the sake of accuracy that the language in FEHA pertaining to limiting a major life activity is included in its definition of "physical disability", not "disabled person").

As the fair housing issue exists not because the Housing Element in effect at the time (the 1998-2005 Element) references parking requirements, but that the Carson Municipal Code (in Section 9128.17, Declaration of Covenants – Conditions and Restrictions, specifically in a provision labeled "Assignment of Conveyance and Use of Required Off-Street Parking", does so, amend that Section of the Code to incorporate the accessible parking spaces language. Indeed, there is no reference in that Section to accessibility of the parking spaces.

As the actions proposed above all involve amendments to the CMC, they could be presented as a joint package of CMC amendments. It appears that the necessary references to the California FEHA can be found in Sections 12955 through 12955.8, but perhaps this should be confirmed by the City Attorney's Office in the process of preparing the Code Amendments.

Clarification: What was referred to above as "the United States Code of Regulations, Part 20" is actually Title 24 Code of Federal Regulations Part 9. Staff's initial examination of that section could not find references there to accessible or disabled parking space requirements, but perhaps this should be handled by the City Attorney's Office in the process of drafting the required amendments to the CMC.

Impediment #4: HOUSING CONDITIONS AND HOUSING STOCK

Housing conditions tend to disproportionately impact lower income households due to costs of repairs. Some 86% (1840) of rental households with incomes 80% of AMI or below have one or more of the four housing problems. For homeowners, this condition

improves somewhat with 67% (2945) of households with incomes 80% of AMI or below having one or more of the four housing problems. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually affect the quality of life in a neighborhood. More than 80% of the City's housing stock was built prior to 1980. It is important to note the potential rehabilitation needs of rental housing in Carson because this is where low-income families tend to reside due to affordability. It is of particular interest for the City to monitor all housing built prior to 1980 for lead-based paint and other hazardous or structurally unsafe housing issues.

Strategy

Institute measures to monitor all housing built prior to 1980 for lead-based paint and other hazardous or structurally unsafe housing issues (such as the presence of asbestos.

Develop and implement a housing rehabilitation program for multifamily and rental housing similar to the existing Neighborhood Pride Program or single-family homes and mobilehomes. (It is noted that approximately 25% of the total units in the city are rental housing.

Impediment #5: AFFORDABLE HOUSING OPPORTUNITY FOR FRAIL ELDERLY AND DISABLED

Single person households relying on Social Security and/or Social Security Disability (SSI) face significant difficulties from a complete lack of affordable, accessible housing at their income level. This specific population set spends, on average, 40% to 60% of their monthly SS/SSI payments on housing.

Frail elderly and disabled, whether homeowners or renters are already cost burdened. Because 82.8% of the total housing stock in the City was built in 1960 or earlier, most housing in the City is not inherently accessible. For frail elderly and disabled homeowners, the ability to "age in place" is restricted by the household's ability to maintain the home and make accessibility adjustments necessary for the health and safety of the household.

Strategy

Focus the use of housing development assistance through the Carson Housing Authority toward increasing the stock of housing available to the elderly and disabled populations.

Impediment #6: DISPROPORTIONATE COST BURDEN AFFECTING ASIAN AND HISPANIC ETHNIC GROUPS

The data on population distribution combined with the data from cost burden indicate disproportionate need in census tracts where Asian and Hispanic populations predominate. Between 27% and 76% of Asian and Hispanic populations have cost burdens.

Strategy

Explore more deeply the reasons for disproportionate cost burden in the census tracts in which Asian Americans and Hispanics predominate. Engage the Housing Rights Center or some other entity to perform this analysis.

Impediment #7: DISCRIMINATION IN MOBILEHOME PARKS (Consolidates and Addresses Prior Impediments)

- The most prevalent form of discrimination in mobile home parks and rental housing is familial status discrimination. Thirty-one percent (31%) of rental housing respondents reported that they had experienced this form of discrimination while thirty-eight percent (37.5%) of mobile home park respondents reported having experience familial status discrimination. **(Impediment #13, 2003)**
- There is a high overall rate of discrimination in mobile home parks. Twenty-Five percent (25%) of mobile home park respondents stated they had experienced discrimination by park management. **(Impediment #14, 2003)**
- Allegations of familial status and national origin discrimination in mobile home parks are a serious fair housing concern. Cases investigated by HRC indicated that in some mobile home parks, there is tension between the residents who have lived there from some time, most of whom are Caucasian seniors, and those who have moved in more recently, many of whom are Latino families with children. In some cases, HRC has found that the managers of the property have also been residents of the parks for many years, and perhaps as a consequence,

tend to grant preferential treatment to the seniors and enforce more restrictive rules against the Latino families. **(Impediment #19, 2003)**

Strategy

The City should make targeted programming and fair housing informational outreach to the mobilehome park communities, including the distribution of multilingual fair housing materials to mobilehome park owners, managers, and residents, a point of emphasis in subsequent contracts with the Housing Rights Center (or whatever entity it contracts with for fair housing services).

Impediment #8: OUTREACH AND PROMOTION OF FAIR HOUSING SERVICES (Consolidates and Addresses Prior Impediments)

- The majority of Carson residents and social service agencies are not aware of fair housing laws and that they exist to provide residents protection against housing discrimination. More than fifty percent (52%) of respondents stated they had never heard of the fair housing laws. **(Impediment #15, 2003)**
- Although the total number of residents calling their fair housing services provider is low relative to comparable cities, the volume of calls has consistently increased over the past five years. This suggests that as the services provider becomes established in the City, more residents are becoming aware of the available services. It also indicates that fair housing issues continue to be a concern for residents. **(Impediment #16, 2003)**
- A comparison of cases filed by Latino residents to the results of the FY 00/01 and FY 01/02 audits suggest that Latino residents are underreporting incidents of discrimination. The audit showed a pattern of preferential treatment for White testers compared to Latino testers, and a pattern of preferential treatment for African-American testers compared to White testers. However, the number of cases filed by African-American residents is higher than the number of cases filed by Latino residents. **(Impediment #18, 2003)**

Strategy

Strategies that have been proposed previously to deal with the above-referenced impediments have included: (1) The City should include a description of fair housing services available to residents and provide a link to HRC (www.hrc-la.org) on the City's website; (2) Work with HRC to explore alternate and more popular locations for HRC's semi-monthly fair housing clinics in the City; (3) Work with HRC to advertise the semi-monthly clinics; (4) Work with HRC to conduct fair housing information presentations to Carson social service agencies with a diverse clientele; and (5) Work with HRC to

distribute Spanish-language brochures, particularly those aimed at increasing reporting. **The City can take a more active role in working with the Housing Rights Center to coordinate fair housing information presentations to Carson social service agencies.**

It should be noted that the other previously-suggested strategies have subsequently been implemented. The City currently provides a link to HRC on the City's website, and also uses the City website to advertise HRC's services, particularly its Fair Housing Walk-In Clinics. The City also distributes flyers at City Hall and at the Congresswoman Juanita Millender-McDonald Community Center regarding HRC's services and the Walk-In Clinics. Written materials regarding HRC's services (flyers, brochures, website announcements) are currently distributed in both English and in Spanish.

The Carson Fair Housing Walk-In Clinics formerly alternated between City Hall and the Millender-McDonald Community Center. (Other locations where the clinics had taken place were the Carson Farmer's Market, which initially was located in the Community Center parking lot, and shifted to the parking lot at the South Bay Pavilion shopping mall). Because of difficulties in providing a consistent and private location at City Hall, the clinics were shifted to the Community Center on a permanent basis circa May 2015.

Albert Robles, Mayor, hereby certifies that this Analysis of Impediments to Fair Housing Choice for the City of Carson represents the City's conclusions about impediments to fair housing choice, as well as actions necessary to address any identified impediments.

Mayor_____ **Date**_____

APPENDIX 1: MAP OF CENSUS TRACTS IN CARSON

