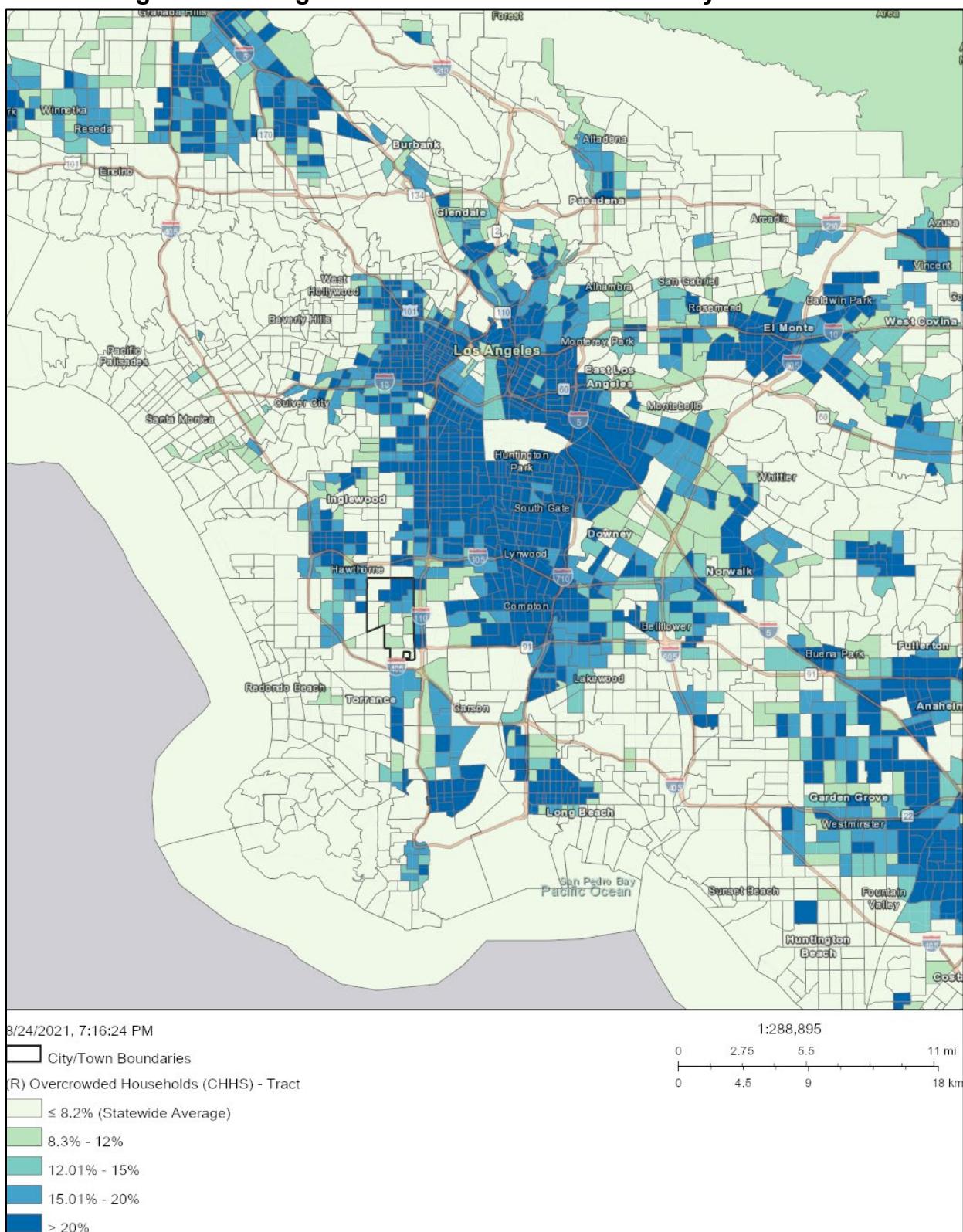
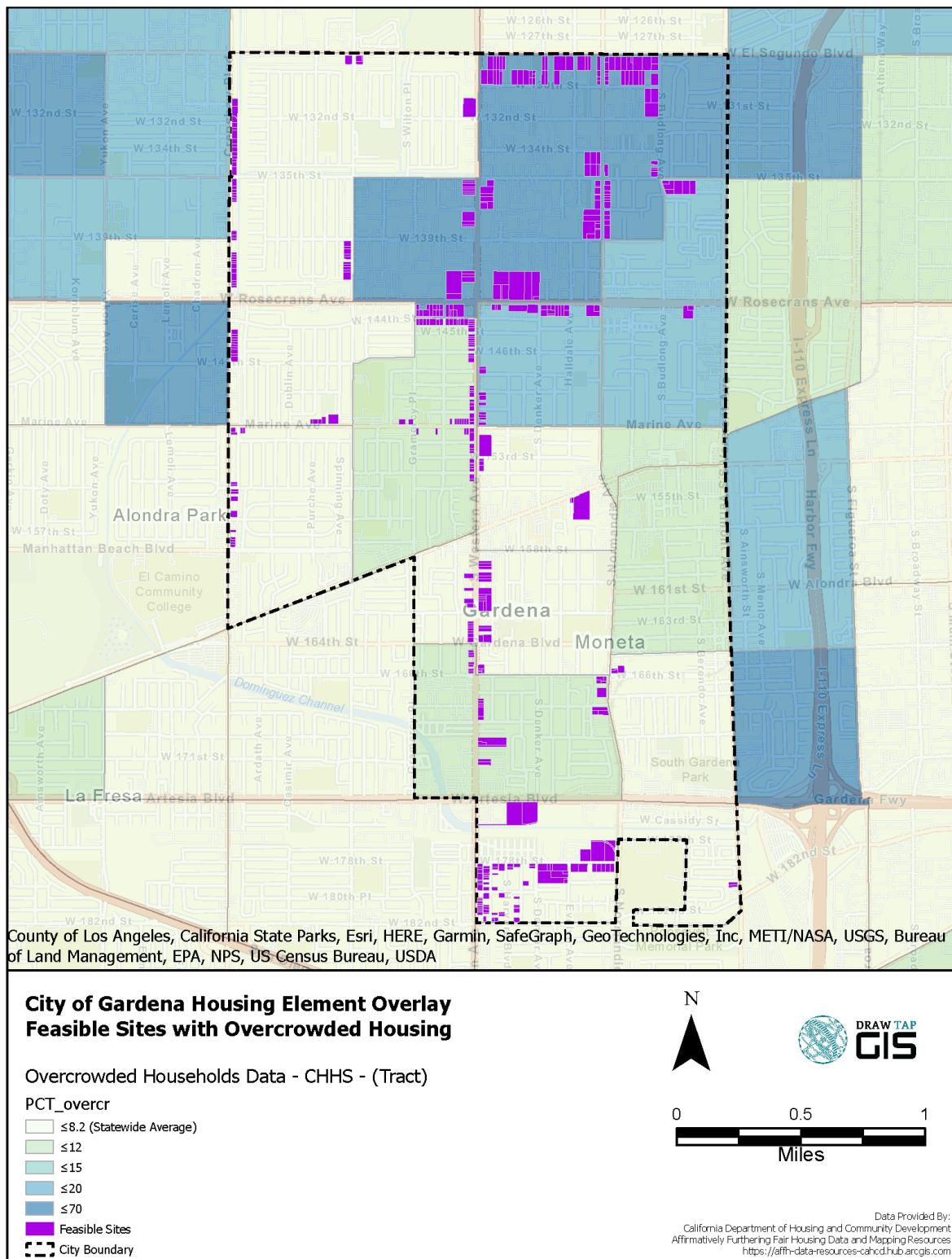


Figure E-36: Regional Overcrowded Households by Tract



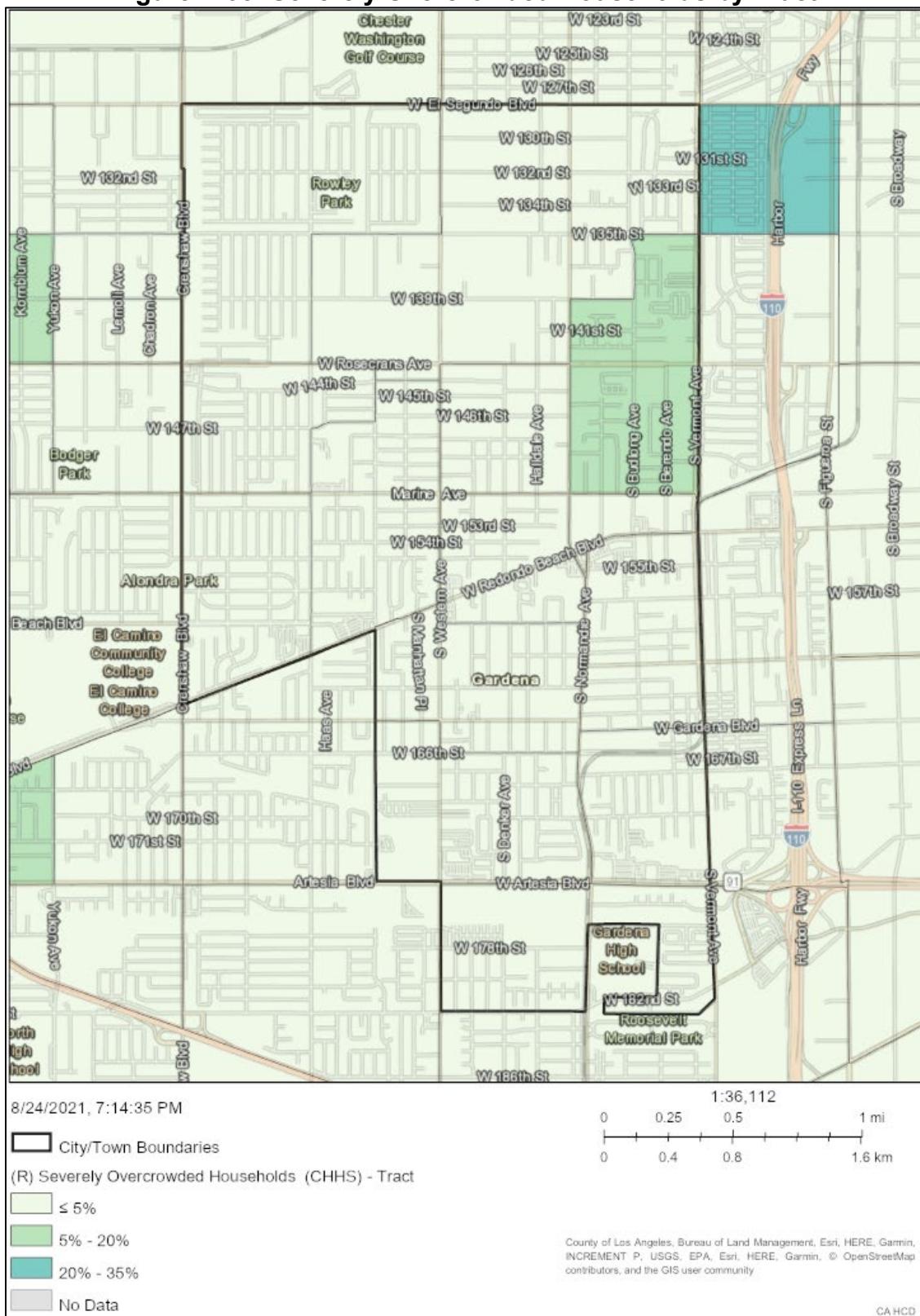
Source: HCD AFFH Data Viewer, HUD CHAS data, 2021.

Figure E-37: Overcrowded Households by Tract and Sites Inventory



Source: HCD AFFH Data Viewer, HUD CHAS data, 2021.

Figure E-38: Severely Overcrowded Households by Tract



Substandard Housing

Incomplete plumbing or kitchen facilities can be used to measure substandard housing conditions. Incomplete facilities are estimated using 2020 HUD CHAS data, and housing age is based on the 2015-2019 ACS. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs.

Regional Trend. Less than one percent of owner-occupied households and 2.8 percent of renter-occupied households in Los Angeles County lack complete plumbing or kitchen facilities (Table E-25). Overall, only 1.7 percent of households in the County lack complete facilities.

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. In general, residential structures over 30 years of age require minor repairs and modernization improvements, while units over 50 years of age are likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. In the County, 86 percent of the housing stock was built prior to 1990, including 60.5% built prior to 1970 (Table E-26).

Local Trend. In Gardena, 1.4 percent of owner-occupied households and 3.8 percent of renter-occupied households lack complete plumbing or kitchen facilities (Table E-25). Substandard housing conditions are more common in Gardena than Los Angeles County, where only 0.5 percent of owner-occupied households and 2.8 percent of renter-occupied households lack complete plumbing or kitchen facilities. As of December 2021, City's Code Enforcement agency estimates 250-300 housing units, or 1.4 percent of the housing stock, are in substandard condition.

Table E-25: Substandard Housing Conditions

	Lacking Complete Kitchen or Plumbing Facilities		Total Households
	Households	Percent	
Gardena			
Owner-Occupied	140	1.4%	10,265
Renter-Occupied	390	3.8%	10,385
Los Angeles County			
Owner-Occupied	6,850	0.5%	1,512,365
Renter-Occupied	50,030	2.8%	1,782,835

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

Housing age can also be used as an indicator for substandard housing and rehabilitation needs. According to the 2015-2019 ACS, 88.5 percent of the housing stock in Gardena was built prior to 1990 and may be susceptible to deterioration, including 66.8 percent built before 1970 which may require major repairs. In comparison, 85.9 percent of housing units Countywide were built in 1989 or earlier

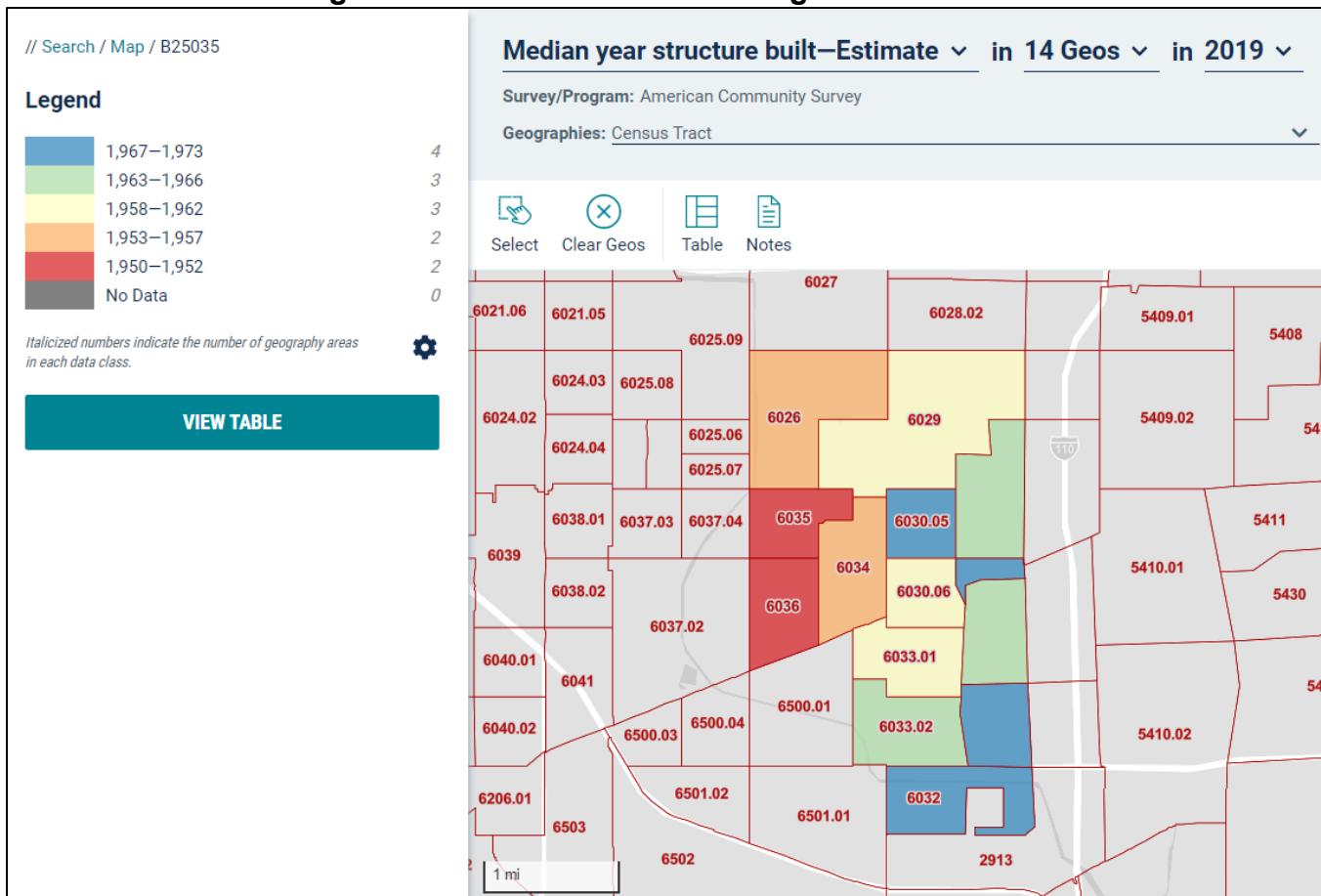
(Table E-26). Tracts 6035, 6034, and 6026 have the highest proportion of housing units aged 50 or older. Figure E-39 shows the median year built for housing units by census tract. Tracts with older housing units are most concentrated in the northwest section of the city. Tracts 6032 and 6031.02, located in southern Gardena, have the largest proportion of new housing built in 1990 or later.

Table E-26: Housing Unit Age

Tract/Jurisdiction	1969 or Earlier (50+ Years)	1970-1989 (30-50 Years)	1990 or Later (<30 Years)	Total Housing Units
6026	85.2%	10.4%	4.3%	2,881
6029	68.4%	23.1%	8.5%	1,329
6030.01	61.8%	25.9%	12.4%	2,453
6030.04	54.2%	37.1%	8.6%	649
6030.05	45.9%	42.6%	11.5%	1,939
6030.06	76.8%	17.6%	5.6%	837
6031.01	62.6%	25.9%	11.5%	1,585
6031.02	43.8%	30.1%	26.0%	1,478
6032	53.7%	13.2%	33.1%	1,230
6033.01	64.1%	21.9%	14.0%	1,573
6033.02	60.5%	28.6%	10.9%	1,679
6034	86.1%	12.7%	1.1%	1,492
6035	94.4%	4.4%	1.2%	922
6036	76.7%	9.6%	13.6%	1,410
Gardena	66.8%	21.8%	11.5%	21,457
Los Angeles County	60.5%	25.4%	14.1%	3,542,800

Source: 2015-2019 American Community Survey (ACS) (5-Year Estimates).

Figure E-39: Median Year Housing Units Built



Displacement Risk

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

- The share of very low-income residents is above 20 percent; and
- The tract meets two of the following criteria:
 - Share of renters is above 40 percent,
 - Share of people of color is above 50 percent,
 - Share of very low-income households that are severely rent burdened households is above the county median,

- The area or areas in close proximity have recently experienced displacement pressures (percent change in rent above County median for rent increases), or
- Difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

Regional Trend. Figure E-40 shows sensitive communities at risk of displacement in the region. Vulnerable communities are most concentrated in the central County areas around the City of Los Angeles, Inglewood, South Gate, and Compton, East Los Angeles, and parts of the San Gabriel Valley and San Fernando Valley. There are fewer vulnerable communities in coastal areas and between Calabasas, Malibu, and Beverly Hills.

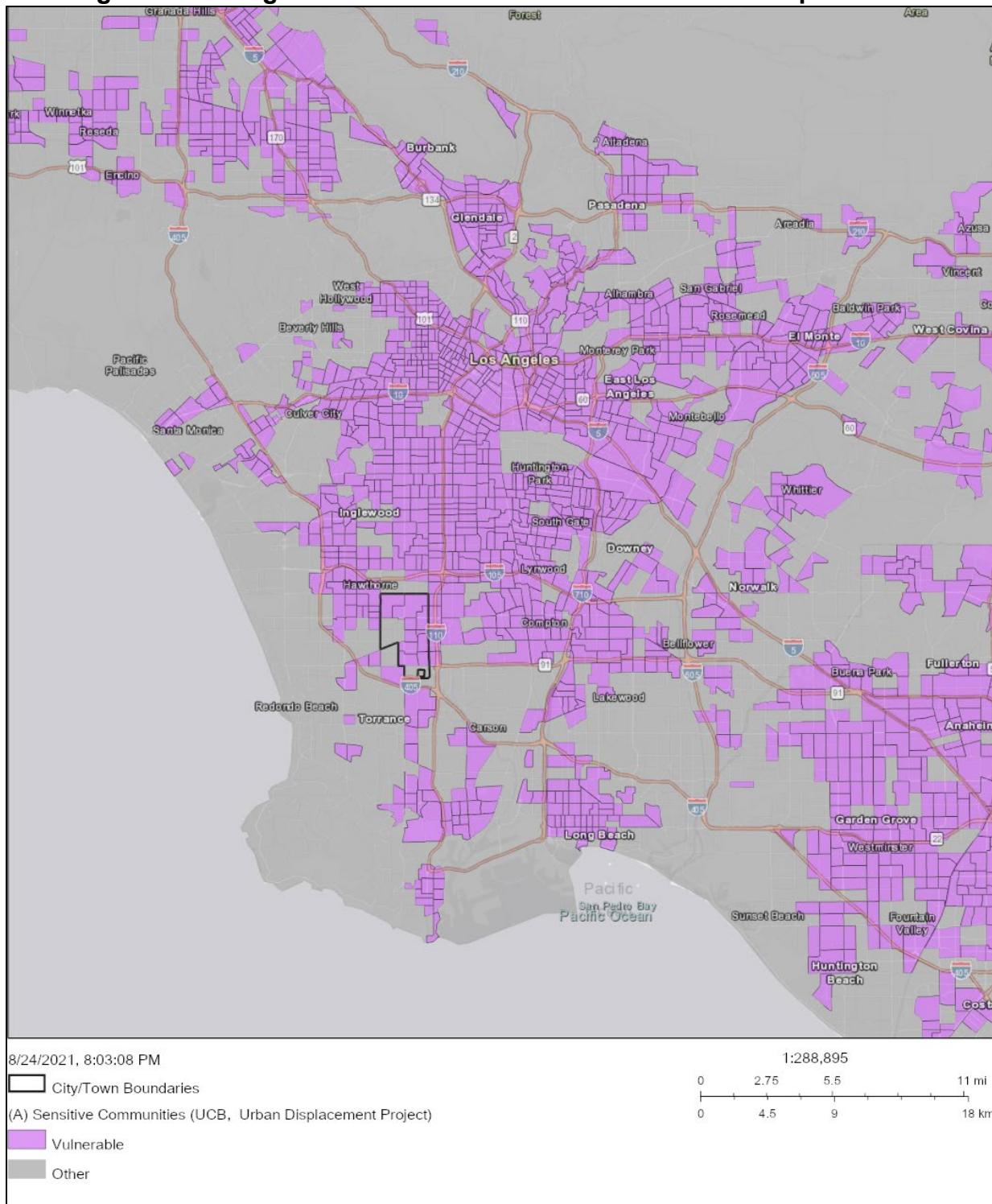
Local Trend. As shown in Figure E-41, the majority of tracts in Gardena are considered sensitive communities where the population is vulnerable to displacement in the event of increased redevelopment or shifts in housing cost. Three tracts in the central western section of the city and the southernmost tract are not considered vulnerable communities. The tracts in the northern section of the city and on tract along the eastern boundary are categorized as low resource areas (see Figure E-21). As discussed previously, racial and ethnic minority populations make up over 80 percent of the population in all but two Gardena block groups (see Figure E-5). Some of the sensitive communities identified also have larger shares of children in female-headed households, LMI households, overcrowded households, and cost burdened owners and renters (see Figure E-12, Figure E-14, Figure E-34, Figure E-35, and Figure E-37).

Sites Inventory. The distribution of RHNA units in sensitive communities at risk of displacement is shown in Table E-27. Because a majority of Gardena tracts are considered sensitive communities, 78.8 percent of RHNA units are located in these areas. There are more low and moderate income units located in sensitive communities compared to above moderate units. Despite the concentration of units in sensitive communities, sites selected to meet the RHNA are generally evenly distributed throughout the City. The high concentration of units in communities at risk of displacement is a reflection of the high rate of these communities citywide.

Table E-27: Distribution of RHNA Units by Communities At Risk of Displacement

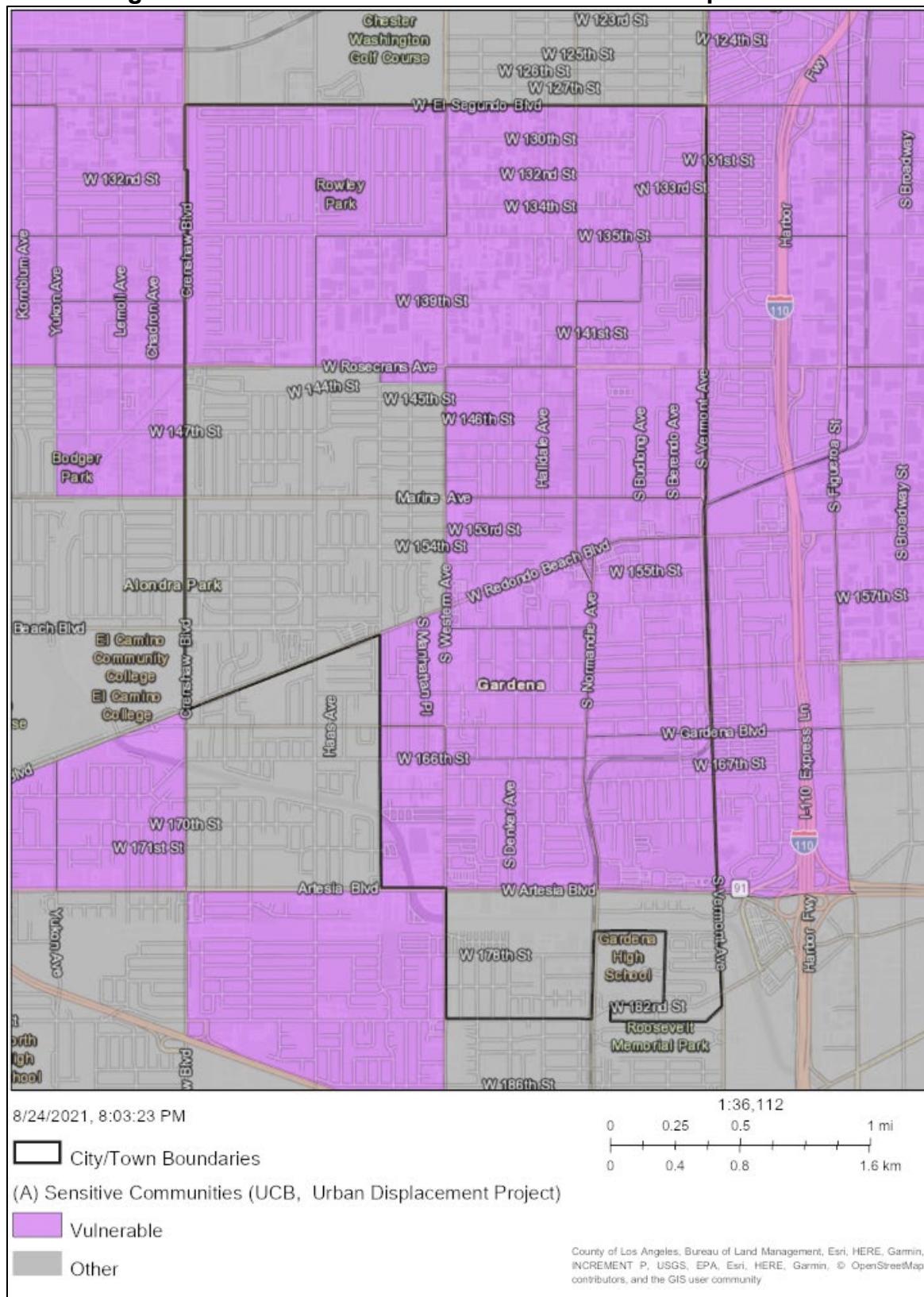
Sensitive Community (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
Not a Sensitive Community	448	17.0%	375	20.9%	572	26.6%	1,395	21.2%
Sensitive Community	2,188	83.0%	1,422	79.1%	1,581	73.4%	5,191	78.8%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

Figure E-40: Regional Sensitive Communities at Risk of Displacement



Source: HCD AFFH Data Viewer, Urban Displacement Project, 2021.

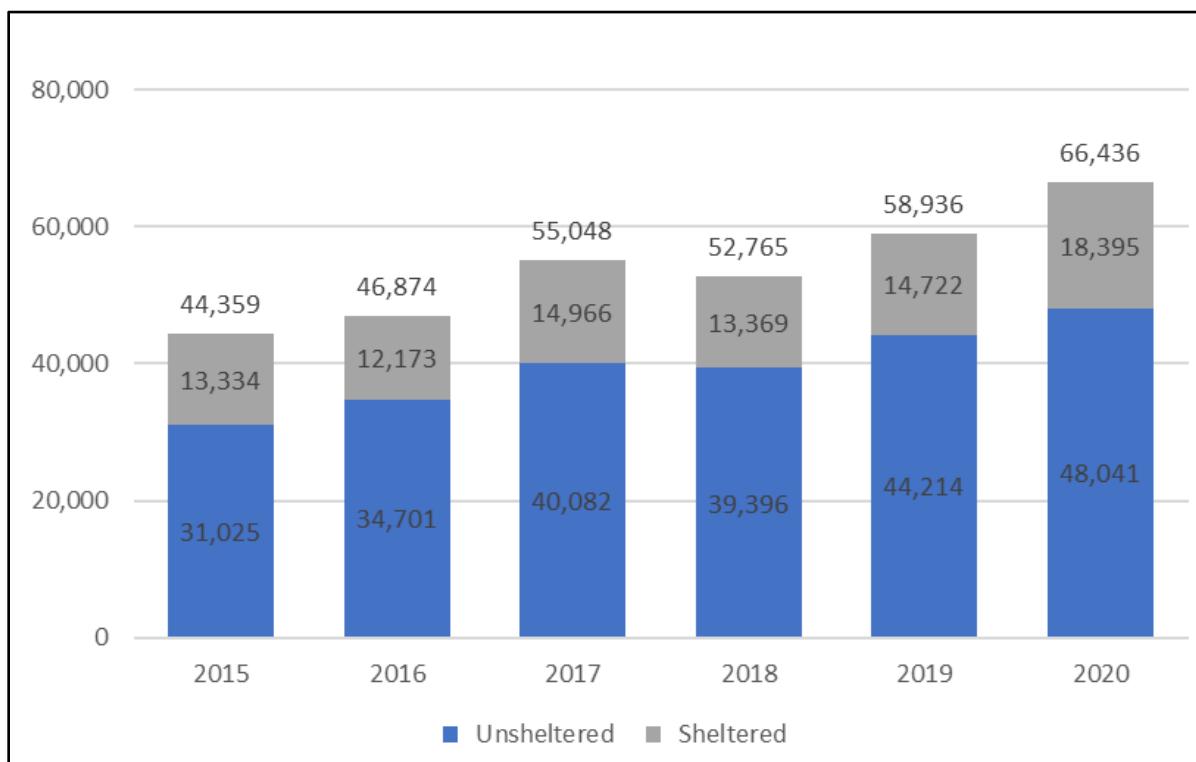
Figure E-41: Sensitive Communities at Risk of Displacement



Homelessness

Regional Trend. The Los Angeles Homeless Services Authority (LAHSA) estimates there were 66,436 persons experiencing homelessness in the Los Angeles County, based on the 2020 Greater Los Angeles Homeless Point-in-Time (PIT) Count. Figure E-42 shows the Los Angeles County homeless populations from 2015 to 2020. Approximately 72 percent of the homeless population is unsheltered and 28 percent is sheltered. The homeless population has increased by nearly 50 percent since 2015, and 12.7 percent since 2019. According to Department of Finance (DOF) estimates, the entire Los Angeles County population grew by only 0.5 percent between 2015 and 2020.

Figure E-42: Los Angeles County Homeless Population Trend (2015-2020)



Source: Los Angeles Homeless Services Authority (LAHSA), 2015-2020 LA County/LA Continuum of Care (CoC) Homeless Counts.

Table E-28 shows the homeless populations in 2019 and 2020 by population type, gender, and health/disability. Approximately 19 percent of the homeless population belongs to a family with one or more child, 38.4 percent are chronically homeless, and 22.3 percent have a serious mental illness. Since 2019, the population of homeless family members (+45.7 percent), persons experiencing chronic homelessness (+54.2 percent), persons fleeing domestic violence (+40 percent), non-binary/gender non-conforming persons (+325.5 percent), and persons with a substance use disorder (+104 percent) have increased the most drastically. The population of transgender persons

and persons with HIV/AIDS experiencing homelessness have decreased by 81.4 percent and 4.7 percent, respectively.

Table E-28: Los Angeles County Homeless Population Demographics (2019-2020)

	2019		2020		Percent Change
	Persons	Percent	Persons	Percent	
Total	58,936	100.0%	66,436	100.0%	12.7%
Individuals	50,071	85.0%	53,619	80.7%	7.1%
Transitional Aged Youth (18-24)	3,635	6.2%	4,278	6.4%	17.7%
Unaccompanied Minors (under 18)	66	0.1%	74	0.1%	12.1%
Family Members*	8,799	14.9%	12,817	19.3%	45.7%
Veterans	3,878	6.6%	3,902	5.9%	0.6%
People Experiencing Chronic Homelessness	16,528	28.0%	25,490	38.4%	54.2%
Fleeing Domestic/Intimate Partner Violence	3,111	5.3%	4,356	6.6%	40.0%
Gender					
Male	39,348	66.8%	44,259	66.6%	12.5%
Female	18,331	31.1%	21,129	31.8%	15.3%
Non-Binary/Gender Non-Conforming	200	0.3%	851	1.3%	325.5%
Transgender	1,057	1.8%	197	0.3%	-81.4%
Health and Disability**					
Substance Use Disorder	7,836	13.3%	15,983	24.1%	104.0%
HIV/AIDS	1,306	2.2%	1,245	1.9%	-4.7%
Serious Mental Illness	13,670	23.2%	14,790	22.3%	8.2%
Percent of Total County Population	--	0.6%	--	0.7%	--

*Members of families with at least one child under 18.

** Indicators are not mutually exclusive.

Source: Los Angeles Homeless Services Authority (LAHSA), 2019-2020 LA County/LA Continuum of Care (CoC) Homeless Counts.

The following data refers to the Los Angeles Continuum of Care (CoC) region, covering all Los Angeles County jurisdictions except for the cities of Long Beach, Pasadena, and Glendale. Special needs groups are considered elderly or disabled (including developmental disabilities), female-headed households, large families, farmworkers, and people experiencing homelessness.

Nearly 20 percent of the homeless population are members of families with one or more child under the age of 18, 9.9 percent are elderly persons aged 62 and older, 17 percent have a physical disability, and 8.3 percent have a developmental disability. Only 32 percent of homeless persons with a developmental disability, 17.3 percent with a physical disability, and 21.5 percent of homeless seniors are sheltered. However, most families (76.3 percent) are sheltered (Table E-29).

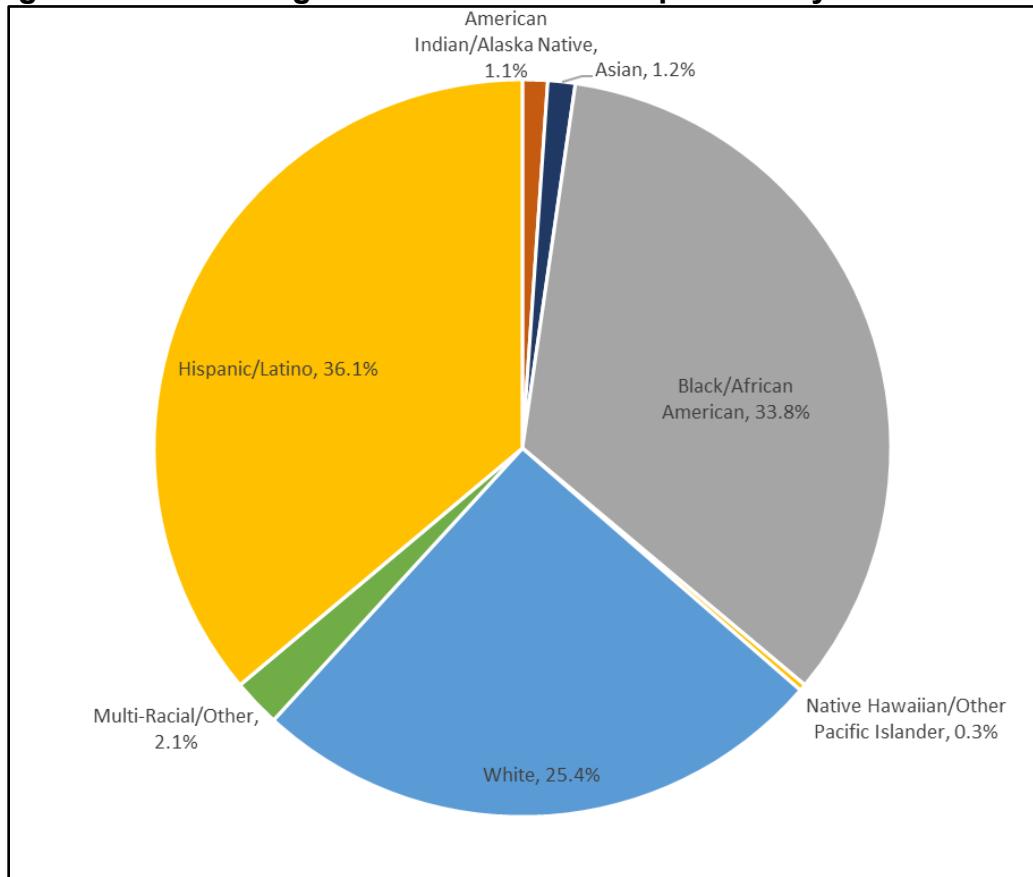
Table E-29: Homeless Populations and Special Needs Groups

Special Needs Group	Sheltered	Unsheltered	Total
Developmental Disability	32.1%	67.9%	5,292
Physical Disability	17.3%	82.7%	10,833
Family Members	76.3%	23.7%	12,416
62+	21.5%	78.5%	6,290

Source: LAHSA, 2020 LA CoC Homeless Counts; 2015-2019 ACS (5-Year Estimates)

Figure E-43 shows the Los Angeles CoC homeless population by race and ethnicity. The Hispanic/Latino, Black/African American, and White populations make up the largest proportions of the homeless population. The Black/African American population is the most overrepresented in the Los Angeles CoC region. Nearly 34 percent% of homeless persons are Black or African American, compared to only 7.8 percent of the population countywide. The American Indian and Alaska Native population is also overrepresented, making up only 0.2 percent of the County population, but 1.1 percent of the homeless population.

Figure E-43: Los Angeles CoC Homeless Population by Race/Ethnicity

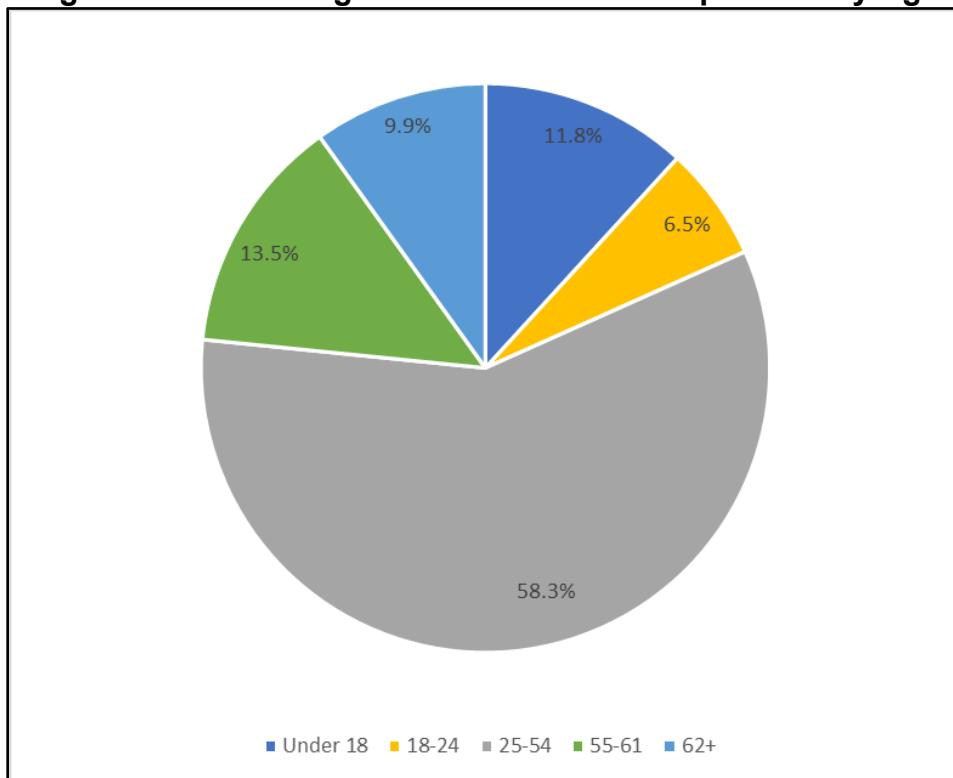


Race/Ethnicity	Homeless Population		% LA County Population
	Persons	Percent	
American Indian/Alaska Native	686	1.1%	0.2%
Asian	774	1.2%	14.4%
Black/African American	21,509	33.8%	7.8%
Hispanic/Latino	23,005	36.1%	48.5%
Native Hawaiian/Other Pacific Islander	205	0.3%	0.2%
White	16,208	25.4%	26.2%
Multi-Racial/Other	1,319	2.1%	2.6%

Source: LAHSA, 2020 LA CoC Homeless Counts; 2015-2019 ACS (5-Year Estimates)

Figure E-44 shows the distribution of homeless persons in the Los Angeles CoC region by age. Adults aged 25 to 54 make up most of the homeless population, followed by adults aged 55 to 61, and children under 18. Children account for 11.8 percent of the homeless population and seniors (age 62+) account for 9.9 percent of the population; 6.6 percent of the homeless population is transitional aged youths between the ages of 18 and 24.

Figure E-44: Los Angeles CoC Homeless Population by Age

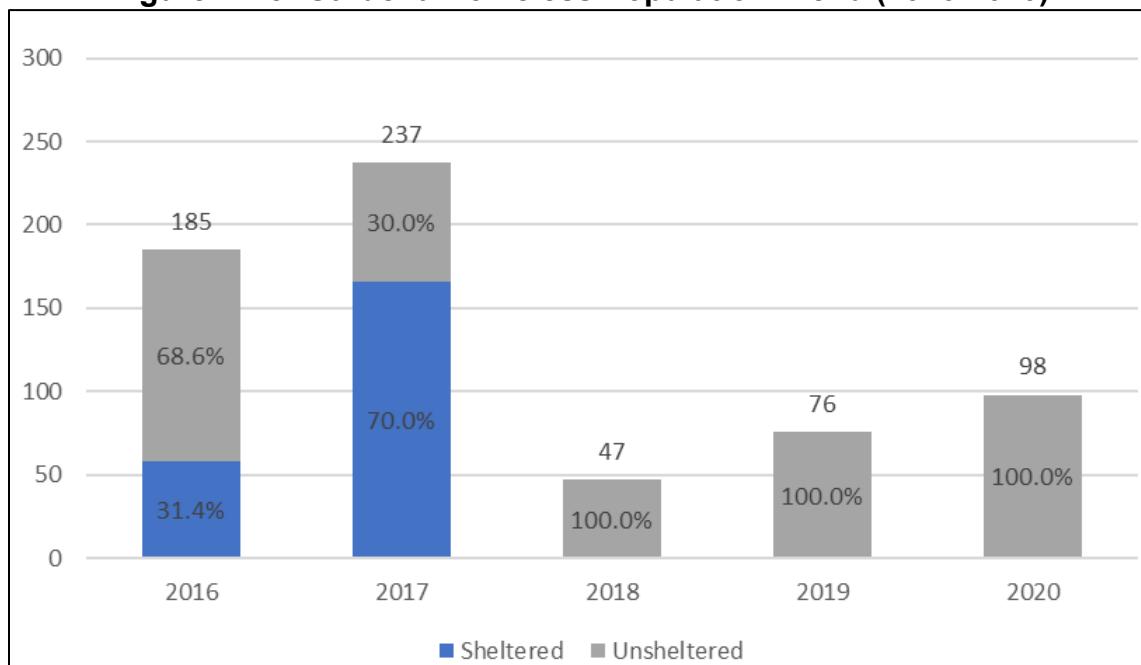


Age	Homeless Population		% LA County Population
	Persons	Percent	
Under 18	7,491	11.8%	22.0%
18-24	4,181	6.6%	9.7%
25-54	37,138	58.3%	43.2%
55-61	8,606	13.5%	8.7%
62+	6,290	9.9%	16.4%

Source: LAHSA, 2020 LA CoC Homeless Counts; 2015-2019 ACS (5-Year Estimates).

Local Trend. Figure E-45 shows the homeless population trend in Gardena from 2016 to 2020. As of 2020, there are 98 persons experiencing homelessness in Gardena, all of which are unsheltered. Of the homeless persons in Gardena, 47.9 percent were on the street, 28.6 percent were in cars, 12.2 percent were in RVs/campers, 8.2 percent were in vans, and 3.1 percent were in makeshift shelters. The population of persons experiencing homelessness in Gardena has decreased by 47 percent since 2016 but increased 28.9 percent since 2019.

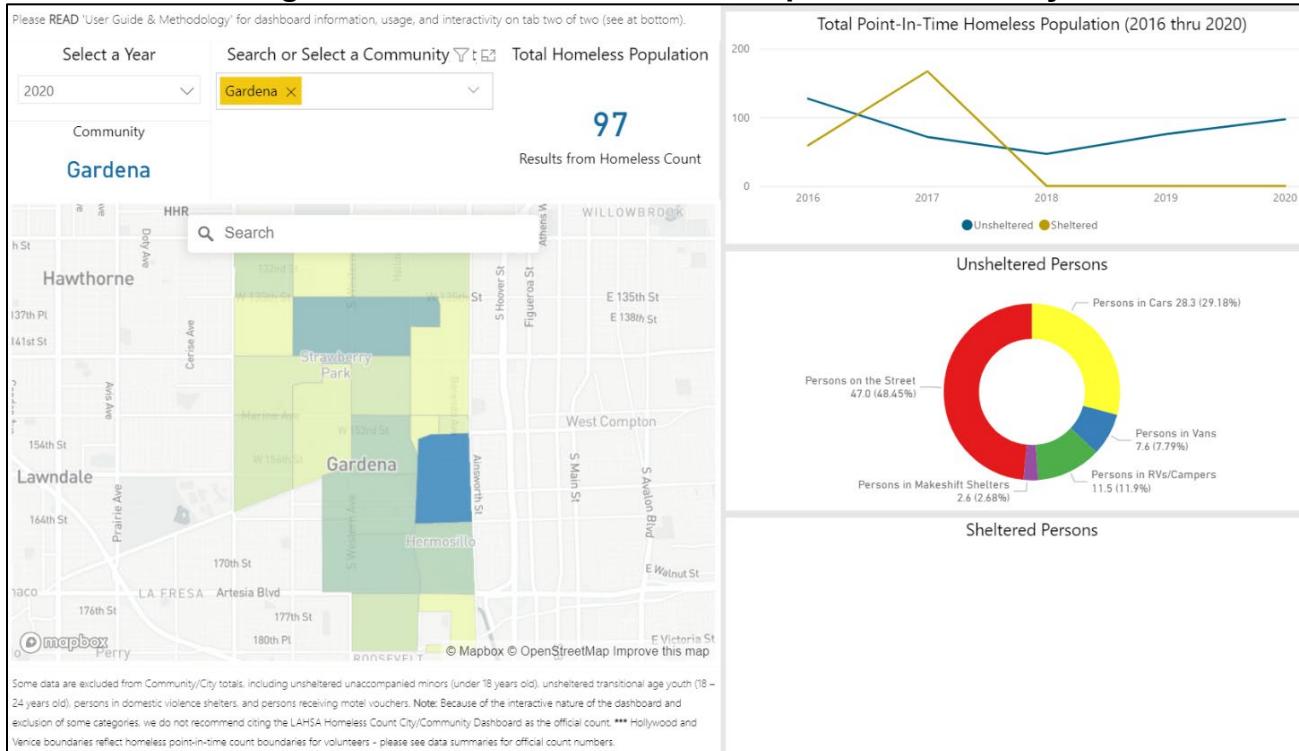
Figure E-45: Gardena Homeless Population Trend (2016-2020)



Source: LAHSA, 2020 Greater Los Angeles City/Community Homelessness Reports Service Planning Area 5.

A summary of the homeless population in Gardena, provided by LAHSA, is shown in Figure E-46. As discussed previously, there are no sheltered persons experiencing homelessness in Gardena. The homeless population summary includes homeless populations by census tract, homeless population trend, and dwelling type of unsheltered persons. Tract 6031.01, along the western City boundary, has the largest homeless population based on the 2020 PIT Count, followed by tract 6029 in the central-northern area of the City. Homeless counts by tract are shown in Table E-30.

Figure E-46: Gardena Homeless Population Summary



Note: Because of the interactive nature of the [LAHSA homeless count] dashboard and exclusion of some categories, LAHSA does not recommend citing this dashboard as the official count. Estimates shown in Figure E-41 are from the 2020 Greater Los Angeles City/Community Homelessness Reports rather than the dashboard.

Source: LAHSA 2020 Homeless Count by Community/City.

Table E-30: Homeless Data by Tract

Tract	Persons	Percent of Total
6037602600	5	5.2%
6037602900	17	17.5%
6037603001	0	0.0%
6037603004	2	2.1%
6037603005	4	4.1%
6037603006	8	8.2%
6037603101	25	25.8%
6037603102	8	8.2%
6037603200	4	4.1%
6037603301	9	9.3%
6037603302	9	9.3%
6037603400	1	1.0%
6037603500	2	2.1%
6037603600	3	3.1%

Note: LAHSA does not recommend aggregating census tract-level data to calculate numbers for other geographic levels. Due to rounding, census tract-level data may not add up to the total for Los Angeles City Council District, Supervisorial District, Service Planning Area, or the Los Angeles CoC.

Source: LAHSA 2020 Homeless Count Data by Census Tract.

The Los Angeles County Coordinated Entry System (LA County CES) assesses individuals to match them with available housing resources and programs. From July to December 2020, 275 individuals in Culver City were assessed through CES, including 14 youths, 55 families, 39 veterans, and 49 persons aged 62 or older. Culver City is a part of Service Planning Area (SPA) 5, serving West Los Angeles communities including Beverly Hills, Brentwood, Culver City, Malibu, Pacific Palisades, Playa del Rey, Santa Monica, and Venice. Culver City and SPA 5 CES assessments and services are presented in Table E-26.

Table E-31: Cumulative CES Statistics (July 2020 – December 2020)

	Gardena	SPA 8	City Share of SPA 8
CES Assessment			
Total Persons	201	3,651	6%
Individuals	80	2,398	3%
Youth	15	213	7%
Families	106	1,083	10%
Veterans	7	250	3%
Persons Aged 62+	17	418	4%
Types of Services Provided to Those Assisted			
Interim Housing	95	1,470	6%
Rapid Re-Housing	80	1,211	7%
Street Outreach (Contacts)	47	1,201	4%
Street Outreach (Engagements)	27	500	5%
Other (Non-Permanent)	57	1,084	5%
Placed into Permanent Housing*	47	684	7%
* Includes persons that have moved into permanent housing during the reporting period (through either rapid re-housing, permanent supportive housing, or other permanent destinations).			
Note: For households with more than one person (including families), the assessment of the head of household is applied to all members.			
Source: LAHSA Homelessness Statistics by City (July 1, 2020 – December 31, 2020), March 2021.			

Summary of Fair Housing Issues

Gardena was approximately 2.1 acres when it incorporated and there have been 39 annexations throughout the decades. Gardena started as an agricultural community and had been home to many Japanese. When World War II ended, the Japanese returned to Gardena and were faced with discrimination in buying homes. Mostly, the Japanese purchased homes in the western and southern areas of the City as those were the only areas they were allowed to buy in. Racial covenants kept the Japanese out of the northern areas, including what is known as Hollypark. The makeup of the City started to change with the Watts riots and the issues relating to school boundaries. Realtors engaged in “blockbusting” wherein a black family would be moved into a predominantly white area by the realtors, causing other white families to leave and

place their homes on the market. These homes were bought primarily by black families who wanted to move out of areas such as Watts. The Japanese areas of the City also became self-perpetuating as the Japanese car companies came to California and made their corporate headquarters on the outskirts of the City. As these businesses moved to the area, they looked for areas where they were welcomed. Gardena provided this infrastructure as well as realtors who could read, write, and speak Japanese. The patterns of development remain in large part today, although the northern portion of the City is also becoming largely Hispanic.

Approximately 41% of owner households and 59% of renter households in Gardena experience a housing problem. In general, more renters in the northern City areas are cost burdened compared to the southern tracts. Northern Gardena is considered a low resource area and has high concentrations of racial and ethnic minorities and LMI households (see Figure E-5, Figure E-14, and Figure E-21). The northern half of the city also has higher concentrations of children in female-headed households compared to the rest of the city (see Figure E-12). Many of these tracts also have higher concentrations of overcrowded households. There is a concentration of homeless persons in some Gardena tracts, one in the central northern area of the City and one along the southeastern City boundary.

Other Relevant Factors

Lending Practices

Home loan applications in Gardena by race and income are shown in Table E-32. Black and Hawaiian/Pacific Islander applicants were denied loans at the highest rates (22.9 percent and 25 percent, respectively), while Hispanic or Latino and White applicants were denied at the lowest rates (13.4 percent and 14.1 percent, respectively). There were eight American Indian/Alaska Native and eight applicants of two or more minority races; 12.5 percent of American Indian/Alaska Native applicants were denied and no applicants of two or more minority races were denied. Applicants belonging to lower income categories had higher denial rates; approximately 38 percent of loan applications submitted by low income residents were denied compared to only 15 percent of applications submitted by upper income residents.

Table E-32: Home Loan Approval and Denial Rates – Gardena (2020)

Loan Type/Applicant Demographics	Approved/ Originated	Denied	Total Applications
Loan Purpose and Type			
Purchase – Conventional	71.9%	11.0%	566
Purchase – Government	63.9%	13.4%	119
Home Improvement	53.7%	27.9%	147
Refinancing	53.8%	19.9%	1,124
Applicant Race/Ethnicity			
American Indian/Alaska Native	75.0%	12.5%	8

Loan Type/Applicant Demographics	Approved/ Originated	Denied	Total Applications
Asian	65.8%	15.2%	453
Black or African American	53.8%	22.9%	424
Hawaiian / Pacific Islander	43.8%	25.0%	32
White	63.9%	14.1%	609
2 or More Minority Races	87.5%	0.0%	8
Joint Race (White/Minority)	71.4%	19.0%	42
Race Not Available	51.3%	19.5%	380
Hispanic or Latino	61.5%	13.4%	366
Not Hispanic or Latino	60.8%	17.7%	1,195
Applicant Income			
Low (0-49% of Median)	32.4%	38.2%	68
Moderate (50-79% of Median)	47.3%	25.7%	148
Middle (80-119% of Median)	53.3%	20.6%	413
Upper (>=120% of Median)	64.1%	14.9%	1,218
Income Not Available	67.9%	11.9%	109
Note: This dataset excludes withdrawn/incomplete applications. Sum of percentages may not total 100%.			
Source: Home Mortgage Disclosure Act (HMDA) Data – City of Gardena, 2020.			

Table E-33 compares the racial/ethnic composition of loan applicants and the City. White applicants are significantly overrepresented in the loan application pool, representing 31.1 percent of loan applicants but only 9.4 percent of the citywide population. Conversely, Hispanic/Latino residents represent only 18.7 percent of the applicant pool, but 39 percent of the total population.

Table E-33: Race/Ethnicity of Loan Applicants vs. Total Population

Race/Ethnicity	Percent of Gardena Population	Percent of Total Loan Applicants
White	9.4%	31.1%
Black/African American	22.2%	21.7%
American Indian/Alaska Native	0.1%	0.4%
Asian	24.7%	23.2%
Native Hawaiian/Pacific Islander	1.1%	1.6%
Hispanic/Latino	39.3%	18.7%

Source: HMDA data, 2020; 2015-2019 ACS (5-Year Estimates).

Historical Trends

The City of Gardena was incorporated on September 11, 1930. It combined the rural communities of Gardena, Moneta, and Strawberry Park into a Municipal Corporation, Sixth Class City. At that time Gardena was a small farming community of about 20,000 people.

During the early years of and prior to Gardena's establishment, Japanese immigrants played a crucial role in the City's farm community. The Japanese Association founded the Moneta Japanese Institute in 1911, funding a schoolhouse and teacher living quarters. In 1916, the Gardena Japanese school was established. During World War II, the City's large Japanese population was relocated to states in the middle of the Country.⁴ Prior to the 1942 Executive Order and subsequent removal and incarceration of Japanese and Japanese Americans, Los Angeles County was home to approximately 36,000 Japanese Americans. In 1945, those incarcerated were granted the opportunity to return to California; however, by the end of the year, only an estimated 3,000 Japanese Americans had returned to Los Angeles County.⁵ According to the 2011-2015 ACS, Gardena has a population of 5,091 residents with Japanese ancestry representing 8.5 percent of the total population.

The 1896 Supreme Court ruling of Plessy v. Ferguson upheld the constitutionality of "separate but equal," ushering in the Jim Crow Era of racial segregation and disenfranchisement. This sentiment spread beyond the South, where African Americans and other minority groups were expelled from predominantly White communities, through the adoption of policies forbidding them from residing or even being within town borders after dark, known as 'sundown towns'.⁶ Contrary to the widespread misconception that these existed only in the deep south, sundown towns were prominent throughout the Country, including more than 100 California towns. Several California sundown towns were located in Los Angeles County.⁷

The Home Owners' Loan Corporation (HOLC), formed in 1933 under the New Deal Program, established the County's first red-lining maps. Gardena received a D-rating, indicating the community was "least desirable" and a higher loan risk. Redlined, or D-rated communities, were typically comprised of large minority communities. Segregation achieved through red-lining was further exacerbated through the establishment of the Federal Housing Administration in 1934. The FHA insured bank mortgages that covered 80% of purchase prices and had terms of 20 years and were fully amortized. However, the FHA also conducted its own appraisals; mortgages were granted only to Whites. Mixed-race neighborhoods and White neighborhoods in the vicinity of Black neighborhoods were deemed "too risky" to invest in.⁶ Figure E-47 shows the 1939 redlining for the South Bay. An updated redlining map from the HCD AFFH Data Viewer of Gardena and the surrounding areas is presented in Figure E-48.

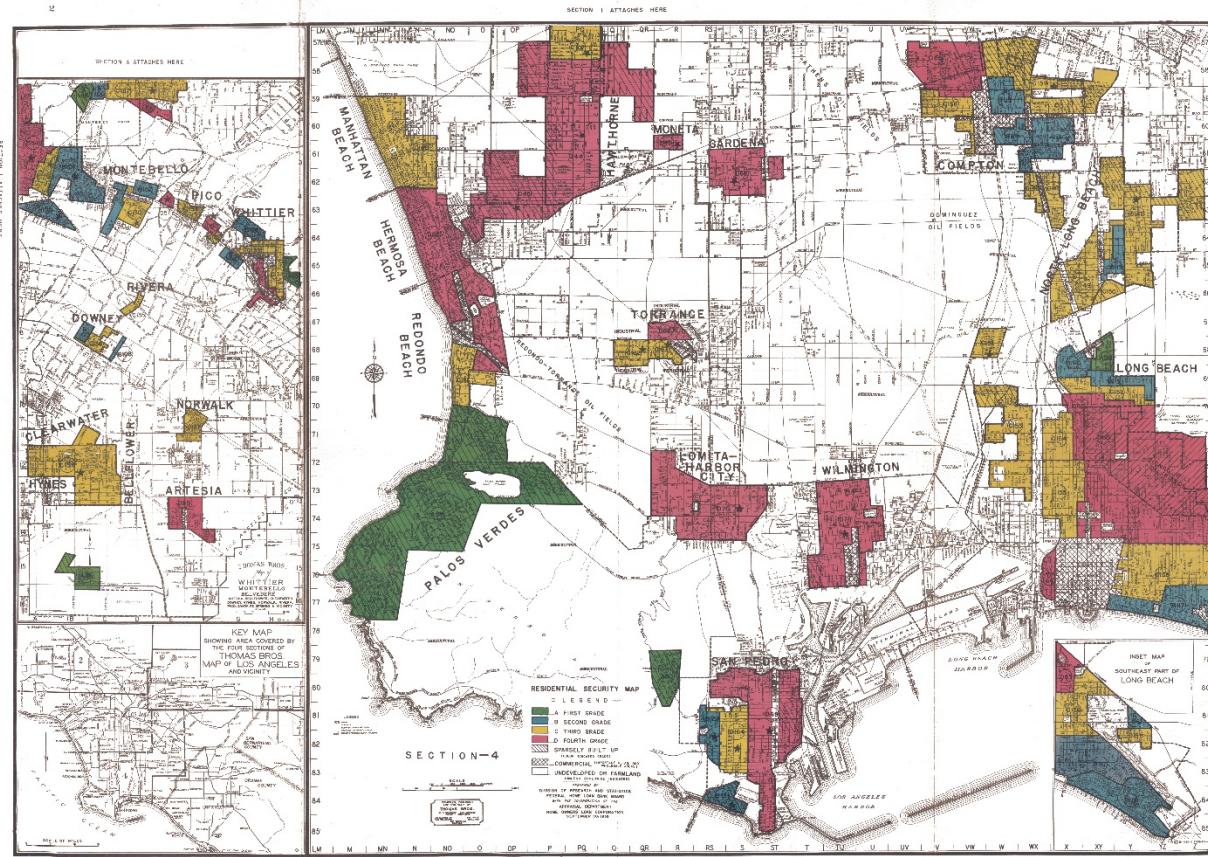
⁴ Los Angeles County Library. (2021). Gardena – Community History, <https://lacountylibrary.org/gardena-local-history/>.

⁵ The National World War II Museum. (2021). The Return of Japanese Americans to the West Coast in 1945. <https://www.nationalww2museum.org/war/articles/return-japanese-americans-west-coast-1945>.

⁶ Rothstein, Richard. (2017). *The Color of Law: A Forgotten History of How Our Government Segregated America*. Liveright Publishing Corporation.

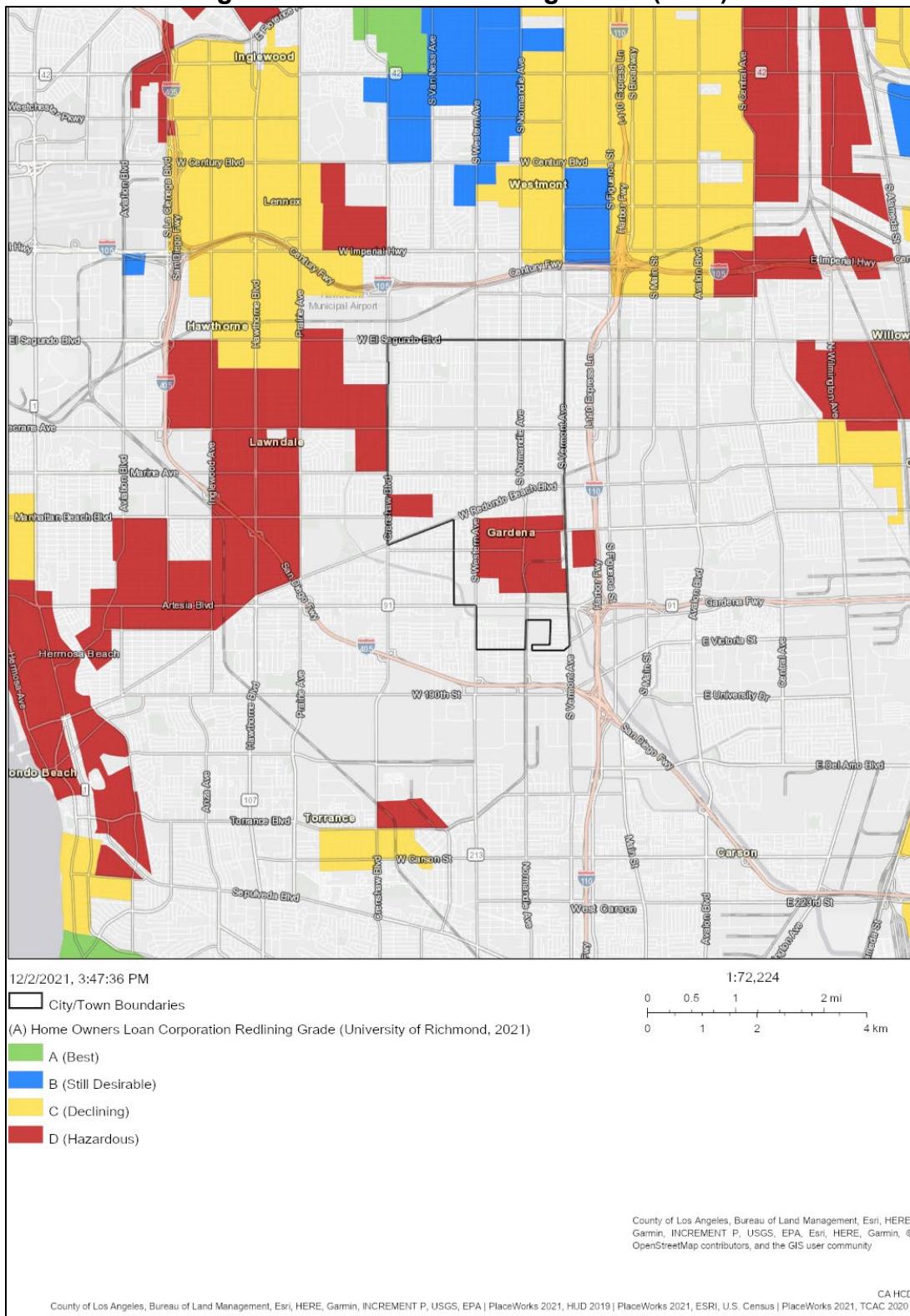
⁷ History and Social Justice. (2021). <https://justice.tougaloo.edu>,

Figure E-47: Home Owners Loan Corporation (HOLC) Redlining Map (1939)



Source: Robert K. Nelson, LaDale Winling, Richard Marciano, Nathan Connolly, et al., "Mapping Inequality," American Panorama, ed. Robert K. Nelson and Edward L. Ayers, accessed December 1, 2021, <https://dsl.richmond.edu/panorama/redlining>.

Figure E-48: HOLC Redlining Grade (2021)

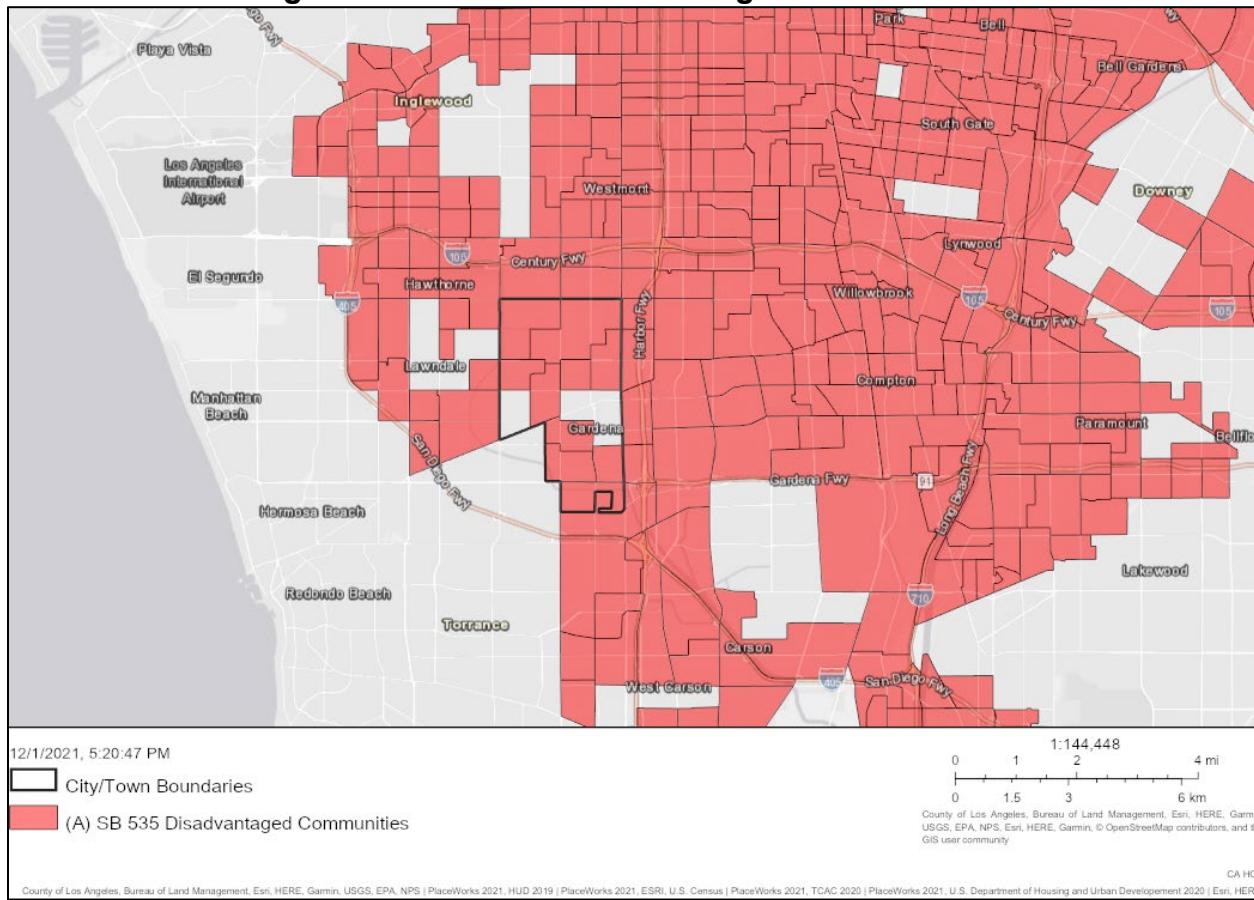


Source: HCD AFFH Data Viewer, University of Richmond (2021), 2021.

SB 535 Disadvantaged Communities

Disadvantaged communities in California are specifically targeted for investment of proceeds from the State's cap-and-trade program. Known as California Climate Investments (CCI), these funds are aimed at improving public health, quality of life and economic opportunity in California's most burdened communities at the same time they're reducing pollution that causes climate change. As identified using the HCD AFFH tool, a majority of tracts in Gardena and the surrounding jurisdictions north, east, and south are considered "disadvantaged communities" (Figure E-49).

Figure E-49: SB 535 Disadvantaged Communities



Source: HCD AFFH Data Viewer, Office of Environmental Health Hazard Assessment (OEHHA), 2021.

Concentration of Fair Housing Issues

While there are concentrations of certain special needs groups and/or fair housing issues throughout the City, the northern section of Gardena, specifically tracts 6026, 6029, 6030.01, and 6030.05, have several overlapping fair housing issues. The following fair housing issues, described previously, are present in northern Gardena tracts:

- Concentrations of racial/ethnic minority populations exceeding 80 percent;

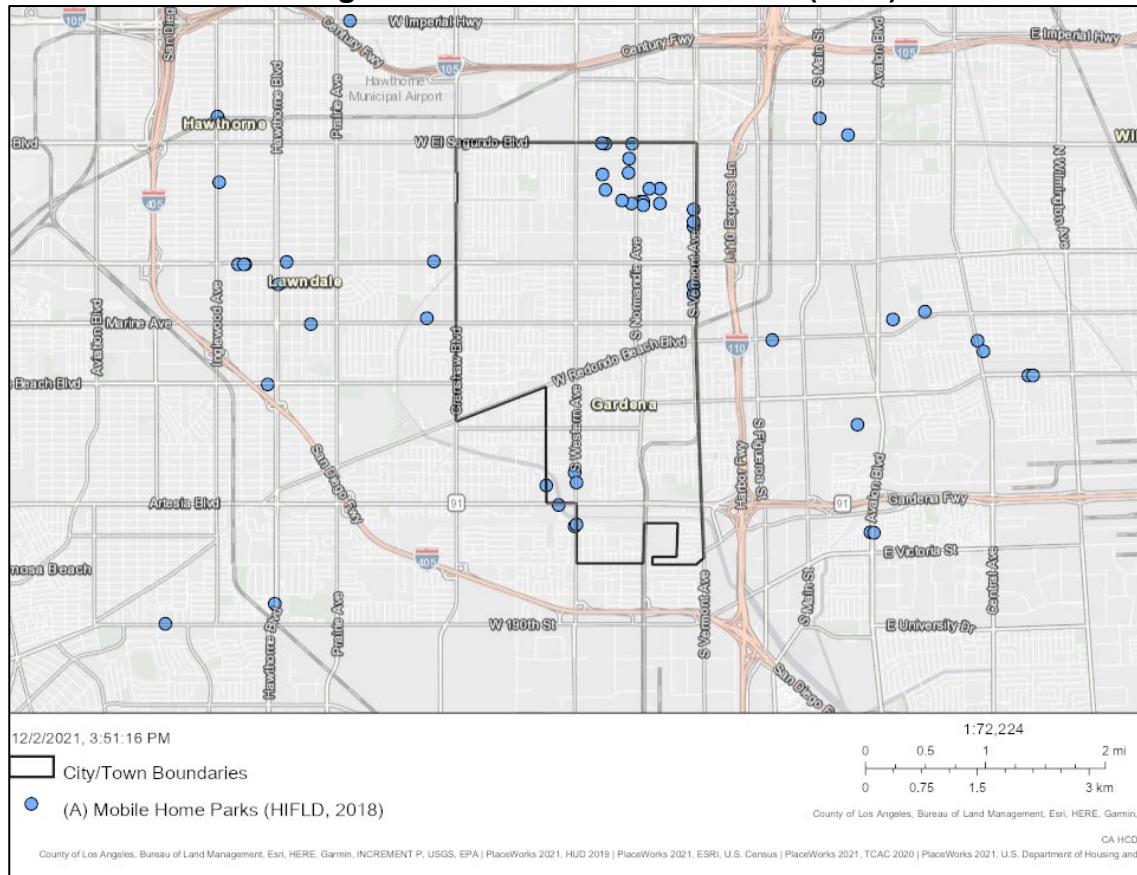
- Concentrations of children living in single-parent female-headed households exceeding 20 percent;
- Concentrations of LMI areas where more than 50 percent of households are low or moderate income;
- Low resource area designations;
- Lower jobs proximity indices;
- Higher rates of cost burdened renters exceeding 60 percent;
- Higher rates of overcrowded households exceeding the Statewide average of 8.2 percent.

Northern Gardena is zoned largely for industrial uses (M-1 and M-2 zones) surrounded by residential zones ranging from single-family (R-1) to high density residential (R-4). The City's Zoning Map is shown in Figure E-51. As presented in Figure E-50, the northeastern corner of the City also has a high concentration of mobile home parks, typically occupied by lower income households. The northeastern corner of the City also has the highest concentrations of overcrowded households (see Figure E-37).

Though all of Gardena has high concentrations of non-White populations, the northern City tracts have African American and Hispanic majority populations, while the southern City tracts have Asian majority populations. The northeastern tract (6029), where mobile home parks and industrial zoning is most concentrated, is the only mostly Black and Latino populated tract while the remainder of the City has a mix of three or more racial/ethnic populations. Racial or ethnic majority populations by tract are shown in Figure E-52 and neighborhood segregation patterns by tract are shown in Figure E-53.

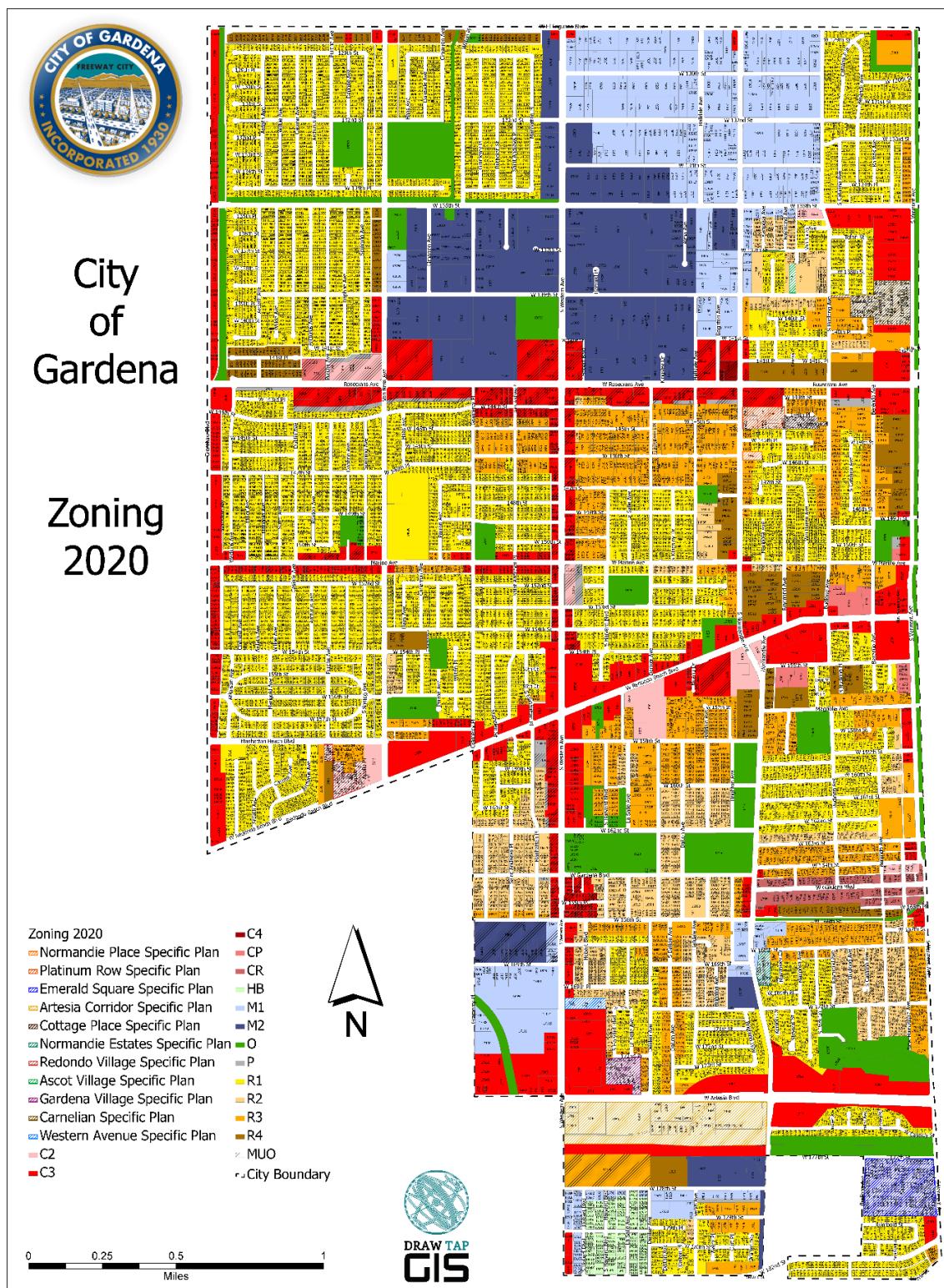
There are also five subsidized housing projects located in the City: Gardena Senior Housing (73 affordable units), Gardena South Park Sr. Citizens (126 affordable units), Gardena Marine Av Sr Housing (79 affordable units), Casimir House (three affordable units), and Spring Park (36 affordable units). Spring Park is an affordable senior housing project located in tract 6026 and may contribute to the concentration of LMI households and persons with disabilities in this tract.

Figure E-50: Mobile Home Parks (2018)



Source: HCD AFFH Data Viewer, Homeland Infrastructure Foundation Level Data (HIFLD) (2018), 2021.

Figure E-51: Gardena Zoning Map (2020)



Source: City of Gardena, 2020.

Figure E-52: Racial/Ethnic Majority Populations by Tract (2018)

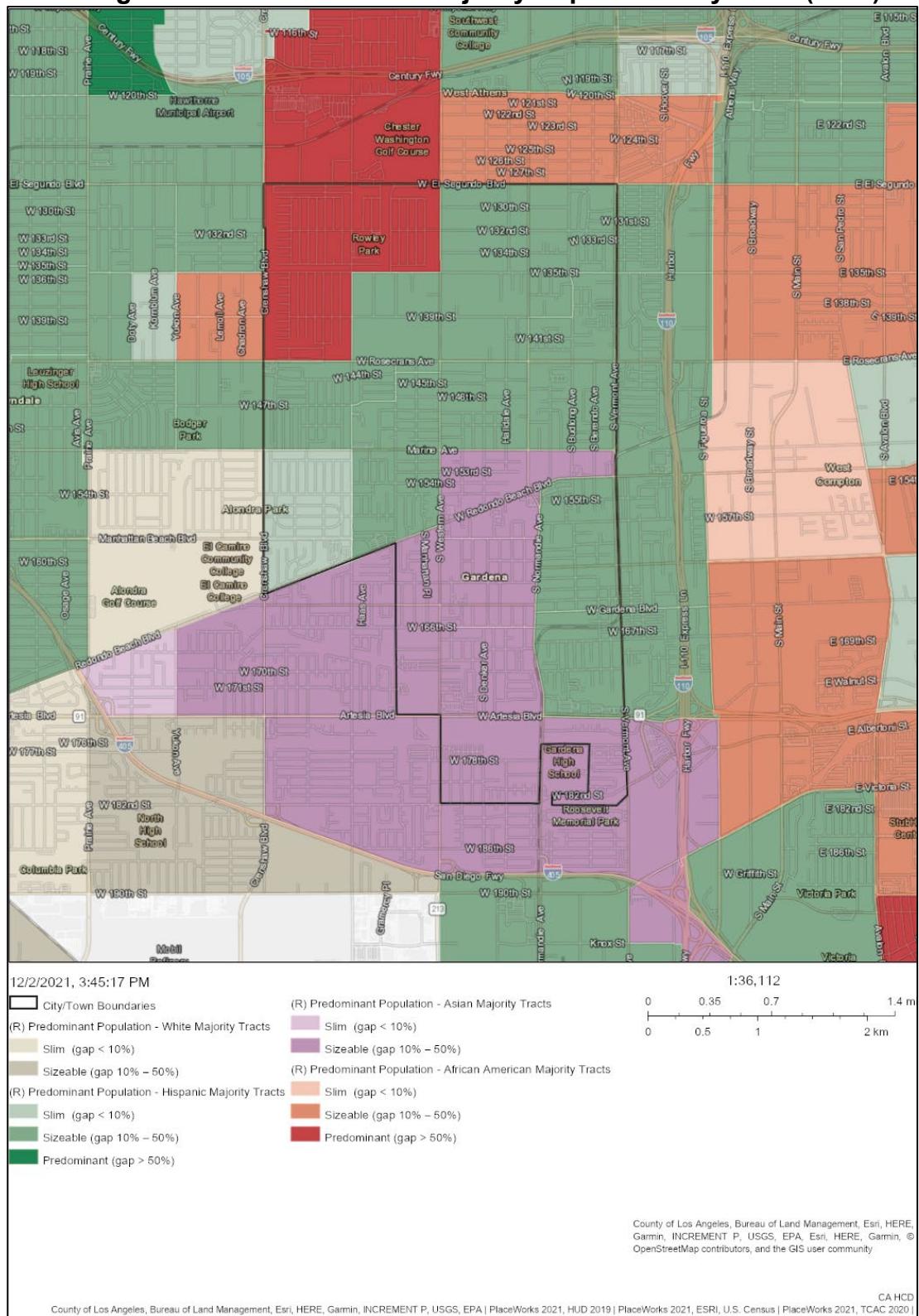
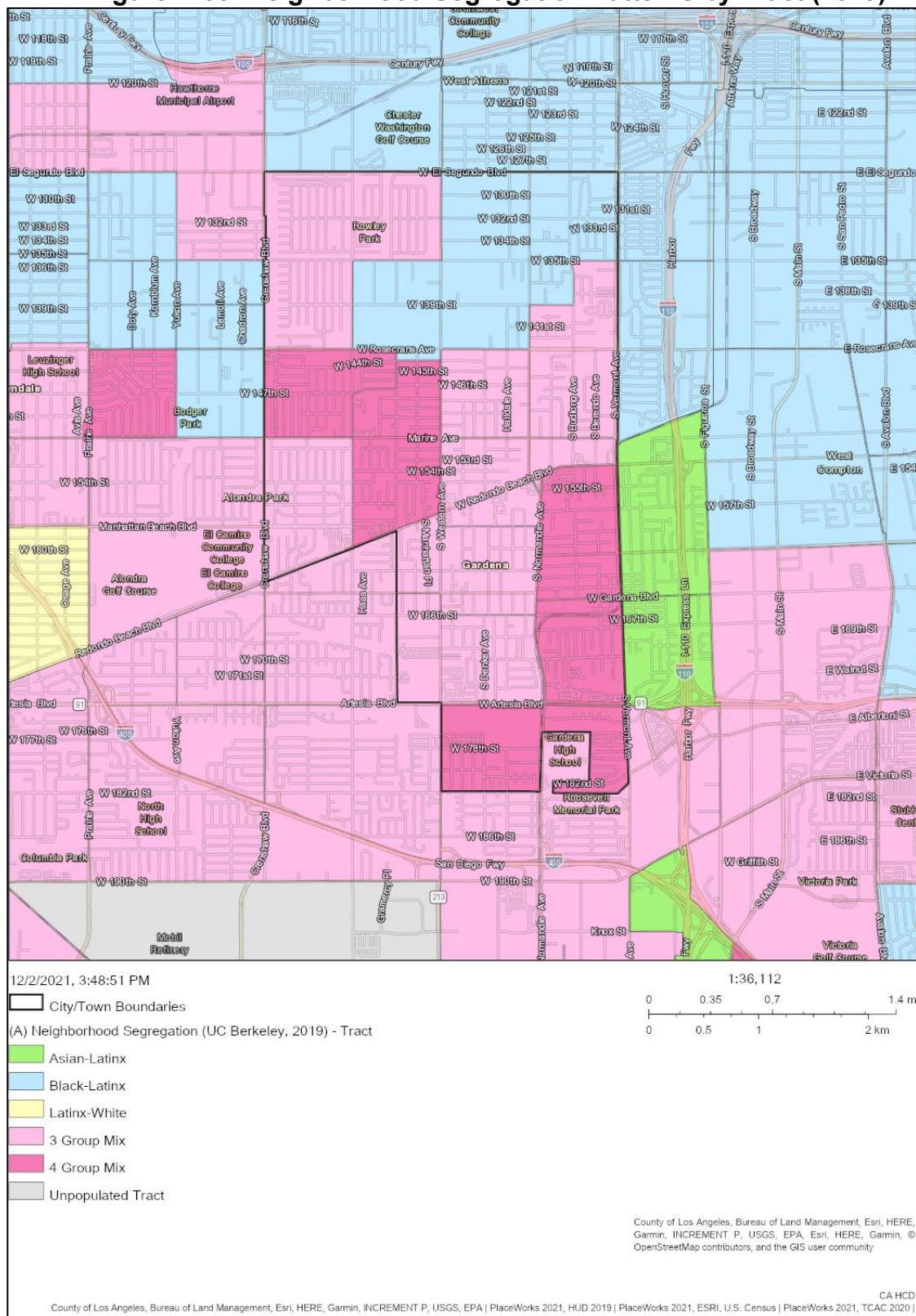


Figure E-53: Neighborhood Segregation Patterns by Tract (2019)



Source: HCD AFFH Data Viewer, UC Berkeley (2019), 2021.

Local Knowledge

In April 2016, the City published an Analysis of Impediments to Fair Housing Choice which included a fair housing community survey and workshop. The Fair Housing Survey was conducted from November 2015 to February 2016 and received 44 responses, 42 of which had not experienced housing discrimination in the City. The survey was distributed at the Nakaoka Senior Center, Civic Center, Parks and Recreation center, City Council meetings, and on the City's website. Table E-34 shows the race or ethnicity and income group of the respondents. One respondent indicated they had experienced discrimination and one respondent was unsure. Neither reported the incident. The respondent that reported experiencing discrimination was African American. The City did not receive any comments during the fair housing workshop or during the 2016 Draft AI public review period.

Table E-34: Survey Respondent Demographics (2016)

	Percent of Respondents
Race/Ethnicity	
White	20%
African American	20%
Asian	20%
Hispanic	14%
Not reported	11%
Non-resident	14%
Income	
<\$10,000/year	5%
\$10,000-\$20,000/year	25%
\$20,000-\$30,000/year	9%
\$30,000-\$40,000/year	7%
\$40,000-\$50,000/year	11%
\$50,000+/year	7%
Not reported	36%

Source: City of Gardena, 2016.

C. Sites Inventory

The City has been allocated a very substantial RHNA that placing large number of units in existing residential and creating new residential/mixed use neighborhoods are necessary and unavoidable strategies to comply with State law. The City's sites inventory used to meet the RHNA is shown in Table E-35 by tract and AFFH variable. The sites inventory is divided into the following sections of the City. Zoning designations are also included for context. Commercial zoning is generally located throughout the City along major roads.

- **Northern Gardena** (tracts 6026, 6029, and 6030.01): Northern Gardena is generally north of W Rosecrans Avenue. A small section of tract 6029 is south of Rosecrans Avenue, bound by Gramercy Place, W 144th Street, and S Western Avenue and tract 6030.01 extends to Marine Avenue.
 - Predominantly R1 (Single-Family Residential), M1 (Industrial), and M2 (General Industrial)
 - Smaller areas zoned R2 (Low-Density Multiple-Family Residential), R3 (Medium Density Multiple-Family Residential), R4 (High Density Multiple-Family Residential), MUO (Mixed Use Overlay), and C-R (Commercial-Residential)
- **Central Gardena** (tracts 6030.05, 6030.06, 6034, 6035, and 6036): Central Gardena is generally bound by Rosecrans Avenue to the north and W Redondo Beach Boulevard to the south. A section of tract 6030.06 is located south of Redondo Beach Boulevard.
 - Predominantly R1 and R3
 - Some R2, R4, MUO, and C-R zones present
- **Southeastern Gardena** (tracts 6031.02, 6032, 6033.01, and 6033.02): Southeastern Gardena is generally bound by W Redondo Beach Boulevard to the north.
 - Mix of R1, R2, and R3
 - Small pockets of M1 and M2
 - MUO, C-R

Northern Gardena

All tracts in Northern Gardena are low resource areas. As discussed in this analysis of fair housing issues, this area of the City tends to have higher concentrations of non-White populations, overcrowded households, and cost burdened renters. All tracts in this section of the City are also communities at risk of displacement.

Of the 3,890 units identified in Northern Gardena, 1,583 are lower income (40.7 percent), 1,153 are moderate income (29.6 percent), and 1,154 are above moderate income (29.7 percent). While the City does place a larger proportion of lower income units in this area, additional housing units in these tracts would increase housing opportunities in the area. Additional lower income units, in conjunction with policies included in this Housing Element, specifically anti-displacement measures, would benefit the existing residents in these neighborhoods.

It is important to note that this area of the City has the highest potential for new housing projects, hence the concentration of units in Northern Gardena. Another 563 lower income units are allocated in Central Gardena and another 490 lower income units are allocated in Southeastern Gardena. While Northern Gardena has the highest concentration of overlapping fair housing issues, the City's RHNA strategy provides a variety of housing types to existing and future residents.

Further, the RHNA strategy places lower income units throughout the City, ensuring existing fair housing issues are not exacerbated.

Central Gardena

Of the Central Gardena tracts containing RHNA units, two are high resource areas, two are moderate resource areas, and one is a low resource area. Tracts 6030.05 and 6030.06, bound by W Rosecrans Avenue, S Normandie Avenue, W 158th Street, and S Western Avenue are also considered communities at risk of displacement. Central Gardena has variable non-White populations, ranging from 77.6 to 96.7 percent, and LMI household populations, ranging from 31.6 to 82 percent.

The City has identified sites with a capacity for 1,283 units in Central Gardena, including 563 lower income units (43.9 percent), 279 moderate income units (21.7 percent), and 441 above moderate income units (34.4 percent). Of the 464 units in the low resource tract (tract 6030.05), 50 percent are allocated towards the moderate and above income RHNA. Tract 6030.05 also has larger proportions of overcrowded households and cost burdened households. However, 50 percent of the units in this tract are for lower income units, providing opportunity for affordable housing and ease existing overcrowding conditions. Another 331 lower income units are also allocated in Central Gardena in moderate and high resource tracts. The City's RHNA strategy generally distributes RHNA units of all income levels throughout the City, including Central Gardena. It is also important to note that 40 percent of all units selected are allocated towards the lower income RHNA.

The City's sites strategy encourages mixed income communities and does not disproportionately expose RHNA units to adverse fair housing conditions in excess of the Citywide trend.

Southeastern Gardena

Three of the four tracts containing RHNA units in Southeastern Gardena are sensitive communities at risk of displacement. TCAC opportunity categorizations for Southeastern Gardena tracts include: one low resource, two moderate resource, and one high resource. This area of the City tends to have smaller populations of LMI households and low to moderate rates of overcrowding and cost burden compared to the remainder of the City.

Of the 1,413 units identified in Southeastern Gardena, 490 are allocated towards the lower income RHNA, 365 to the moderate income RHNA, and 558 to the above moderate income RHNA. A concentration of smaller sites was identified in tract 6032, the southernmost tract. Smaller sites may not be suitable for higher density low income units, hence the higher concentration of above moderate income units

in this section of the City. Furthermore, only a limited number of units are located in the Low Resource tract. The largest number of units are located in the High Resource tract.

Fair housing issues tend to be less prominent in Southeastern Gardena. The City's RHNA strategy includes a variety of sites suitable for an array of housing types. The RHNA strategy does not exacerbate existing conditions related to fair housing in this area of the City.

Table E-35: Residential Sites Inventory by Area and AFFH Variable

Area/Tract	# of HHs	Total Units	Income Distribution			TCAC Opp. Category	% Non-White	% LMI Pop.	% Over-crowded	Renter Cost Burden	Owner Cost Burden	At Risk of Displacement?
			Lower	Moderate	Above Moderate							
Northern Gardena												
6026	2,881	540	220	121	199	Low	96.5%-97.7%	39.0%-64.6%	5.6%	66.7%	45.0%	Yes
6029	1,316	3,204	1,342	922	940	Low	92.0%-95.3%	52.3%-80.0%	22.1%	66.6%	39.5%	Yes
6030.01	2,421	146	21	110	15	Low	94.1%-95.1%	63.7%-65.0%	18.6%	49.0%	57.1%	Yes
Central Gardena												
6030.05	1,872	464	232	69	163	Low	95.3%-96.7%	63.2%-65.9%	16.6%	67.1%	53.8%	Yes
6030.06	810	245	122	37	86	Moderate (Rap. Changing)	92.2%	57.0%	6.1%	46.4%	22.8%	Yes
6034	1,421	404	182	56	166	Moderate	82.9%-94.1%	31.6%-82.0%	9.2%	59.5%	39.2%	No
6035	883	106	27	59	20	High	80.3%-86.1%	40.1%-56.8%	7.0%	49.3%	39.9%	No
6036	1,364	64	0	58	6	High	77.6%-79.4%	45.9%-50.6%	4.3%	40.0%	50.3%	No
Southeastern Gardena												
6031.02	1,318	18	0	18	0	Low	94.7%	71.0%	7.6%	45.0%	28.1%	Yes
6032	1,163	821	239	202	380	High	83.2%-91.5%	16.1%-62.9%	4.4%	49.8%	36.1%	No
6033.01	1,418	326	162	49	115	Moderate	86.1%-95.7%	54.6%-77.9%	7.4%	52.9%	40.0%	Yes
6033.02	1,630	248	89	96	63	Moderate	85.8%-95.2%	46.9%-74.4%	9.6%	60.7%	43.1%	Yes

No sites are allocated in tracts 6030.04 or 6031.01 along the eastern City boundary (Marin Avenue to the north, Gardena Boulevard to the south, Vermont Avenue to the east, and Normandie Avenue to the west).

D. Identification and Prioritization of Contributing Factors

Fair Housing Enforcement and Outreach

There has been a lack of fair housing testing in Gardena in recent years. In 2020, 130 discrimination cases were opened in Los Angeles County, mostly on the basis of disability (66%) and race (21%). HUD reported 26 fair housing inquiries in Gardena between 2013 and 2021. Further, concentrations of Housing Choice Voucher (HCV) recipients do not always correspond with the populations of cost burdened renters. In the northeastern area of the City specifically, there are very few HCV recipients while 66.6% of renters are cost burdened. The northeastern area of the City also has a high concentration of overcrowded households and a moderate proportion of elderly housing units that may be in need of rehabilitation. This may indicate that households are not aware of resources related to fair housing that may be available, including HCVs.

Contributing Factors:

- Lack of monitoring
- Lack of outreach towards special needs groups

Concentration of Special Needs Groups

The City has overlapping concentrations of LMI households, disabled persons, and children in female-headed households in the northern area of the City. Many of these tracts were also identified as low resource areas or as sensitive communities at risk of displacement. The northern section of the City also has a concentration of households with disproportionate housing needs including overpaying renters, overcrowded households, and aging housing units that may need rehabilitation. The concentration of mobile home parks may contribute to the clustering of fair housing issues in this area.

Contributing Factors

- Lack of private investment
- Location and type of affordable housing

Substandard Housing Conditions

1.4% of owner-occupied households and 3.8% percent of renter-occupied households lack complete plumbing or kitchen facilities and 88.5% of the City's housing stock was built prior to 1990 and may be susceptible to deterioration. Tracts with older housing units are most concentrated in the northern and western areas of the City. The northern section of Gardena has a higher concentration of

overlapping fair housing issues including LMI households, cost burdened renters, and overcrowded households.

Contributing Factors

- Age of housing stock
- Cost of repairs of rehabilitation

Displacement Risk of Low Income Residents Due to Economic Pressures

Most of the City is considered a sensitive community at-risk of displacement. Approximately 60-80% of renter-occupied households in the northern half of Gardena are cost burdened, while only 40-60% of renter-occupied households in the southern section are cost burdened. Many of these tracts also have higher concentrations of LMI households, disabled persons, and children in female-headed households.

Contributing Factors

- Unaffordable rents
- Concentration of poverty in some tracts
- Availability of affordable housing