

Appendix E: Affirmatively Furthering Fair Housing (AFFH)

A. Introduction and Overview of AB 686

In 2017, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH) into California state law. AB 686 defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. The Bill added an assessment of fair housing to the Housing Element which includes the following components:

- A summary of fair housing issues and assessment of the jurisdiction’s fair housing enforcement and outreach capacity;
- An analysis of segregation patterns, racially/ethnically concentrated areas of poverty, disparities in access to opportunities, and disproportionate housing needs;
- An assessment of contributing factors; and
- An identification of fair housing goals and actions.

The AFFH rule was originally a federal requirement applicable to entitlement jurisdictions, those with populations over 50,000 that can receive HUD Community Planning and Development (CPD) funds directly from HUD. Before the 2016 federal rule was repealed in 2019, entitlement jurisdictions were required to prepare an Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI). AB 686 states that jurisdictions can incorporate findings from either report into the Housing Element.

This analysis of fair housing issues in Gardena relies on the 2016 City of Gardena Analysis of Impediments to Fair Housing Choice (2016 AI), 2018 Analysis of Impediments to Fair Housing Choice (2018 AI) prepared by the Los Angeles Community Development Authority (LACDA), California Department of Housing and Community Development (HCD) AFFH Data Viewer mapping tool, 2015-2019 American Community Survey (ACS), HUD Comprehensive Housing Affordability Strategy (CHAS) data, HUD AFFH data, and additional local sources of information.

B.Fair Housing Issues

Fair Housing Enforcement and Outreach

Federal fair housing laws prohibit discrimination based on: race, color, religion, national origin, sex/gender, handicap/disability, and familial status. Specific federal legislation and court rulings include:

- **The Civil Rights Act of 1866-** covers only race and was the first legislation of its kind
- **The Federal Fair Housing Act 1968-** covers refusal to rent, sell, or finance
- **The Fair Housing Amendment Act of 1988-** added the protected classes of handicap and familial status
- **The Americans with Disabilities Act (ADA)-** covers public accommodations in both businesses and in multi-family housing developments
- **Shelly v. Kramer 1948-** made it unconstitutional to use deed restrictions to exclude individuals from housing
- **Jones v. Mayer 1968-** made restrictive covenants illegal and unenforceable

California state fair housing laws protect the same classes as the federal laws with the addition of marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination. Specific State legislation and regulations include:

- **Unruh Civil Rights Act-** extends to businesses and covers age and arbitrary discrimination
- **California Fair Employment and Housing Act (Rumford Act)-** covers the area of employment and housing, with the exception of single-family houses with no more than one roomer/boarder
- **California Civil Code Section 53-** takes measures against restrictive covenants
- **Department of Real Estate Commissioner's Regulations 2780-2782-** defines disciplinary actions for discrimination, prohibits panic selling and affirms the broker's duty to supervise
- **Business and Professions Code-** covers people who hold licenses, including real estate agents, brokers, and loan officers.

The City has committed to complying with applicable federal and State fair housing laws to ensure that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status, or sex as outlined in the City's 2016 Analysis of Impediments to Fair Housing Choice (2016 AI). Further, the Los Angeles County Development Authority (LACDA) prohibits discrimination in any aspect of housing on the basis of race, color, religion, national origin, disability, familial status, or sex.

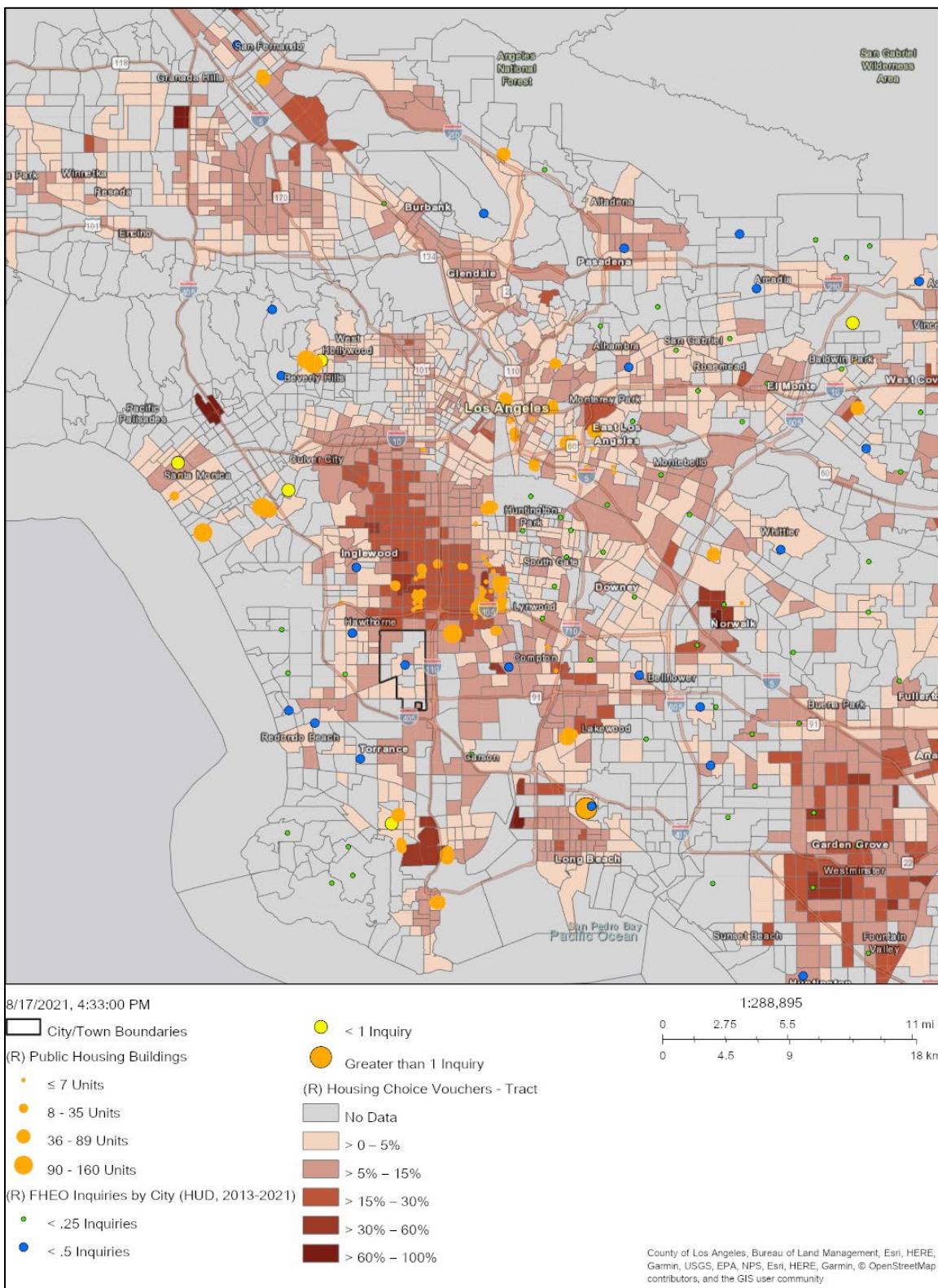
Regional Trend. According to HUD's Office of Fair Housing and Equal Opportunity (FHEO) records, 130 housing discrimination cases were filed in Los Angeles County in 2020, compared to 291 in 2010. In 2020, a majority of cases were related to disability (66%). Another 21 percent of cases were related to racial bias. The percent of cases related to disability has increased significantly since 2010, when only 36 percent of cases reported a disability bias. Public housing buildings, FHEO inquiries by City and housing choice voucher (HCV) recipients by tract are shown in Figure E-1. HCVs are most concentrated in the area north of Gardena, near Inglewood, the City of Los Angeles, and in the adjacent unincorporated County areas. Public housing buildings are concentrated in the same area. However, there are many public housing buildings scattered throughout the County.

Local Trend. Under contract with the City, the Fair Housing Foundation (FHF) provides fair housing services to Gardena residents. The FHF provides the following fair housing related services: discrimination complaint intake and investigation; fair housing training, outreach and education, general housing (landlord/tenant) counseling and mediation; enforcement and impact litigation. The FHF also conducts fair housing testing in Gardena and throughout Los Angeles. The following fair housing tests were conducted in Gardena:

- Income (FY 2003-2004): Six tests, all resulting in sustained allegations;
- Familial Status (FY 2004-2005): Six tests, three showed inconclusive evidence, three showed no evidence;
- Disability (relating to companion animals) (FY 2007-2008): Two tests, one showed inconclusive evidence, one showed no evidence;
- Race (FY 2008-2009): Five tests, three showed inconclusive evidence, one showed no evidence, and one showed sustained allegations.

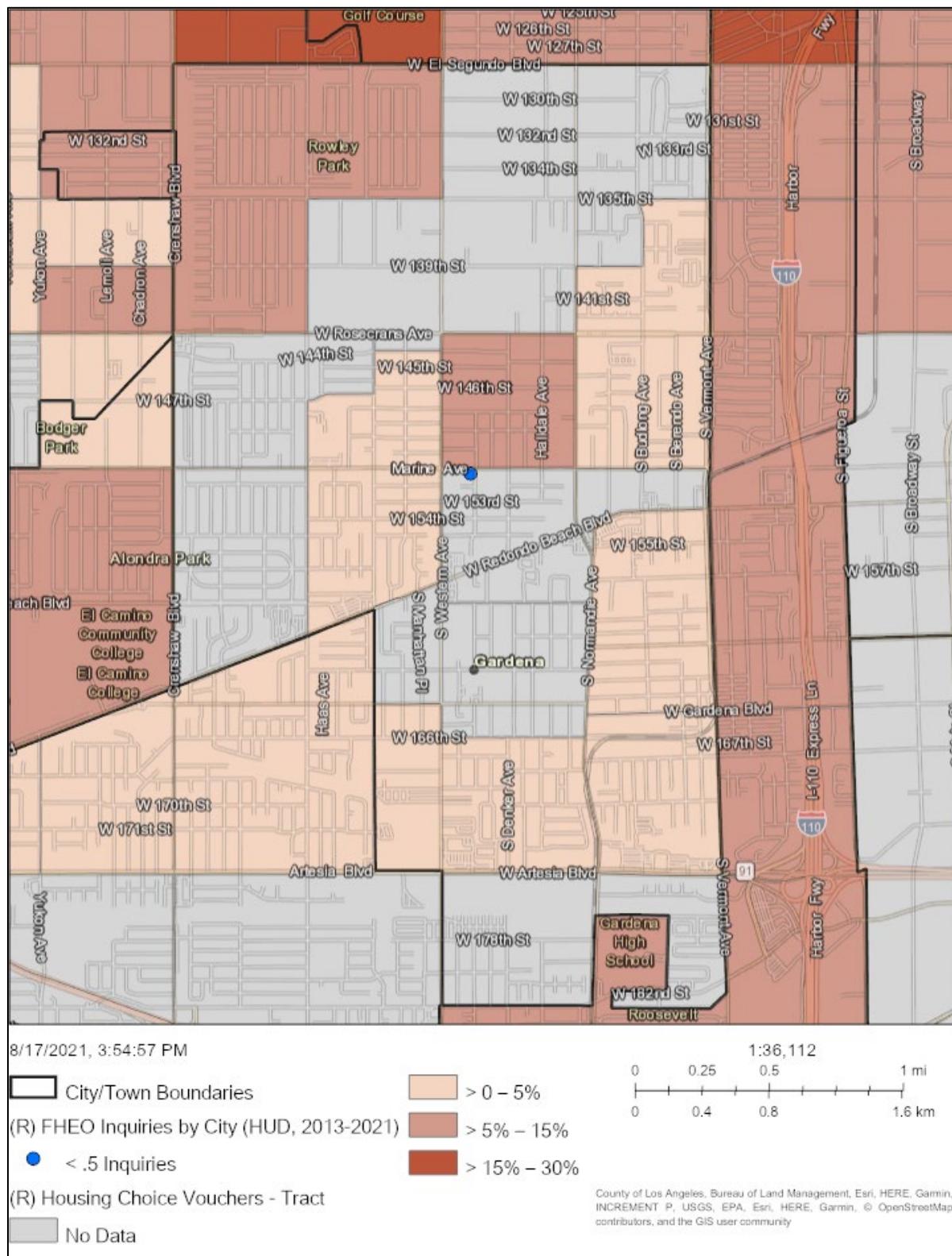
HUD reported that Gardena received a total of 26 FHEO inquiries between January 2013 and March 2021. Of the 26 inquiries, three were related to disability, one race, and one national origin. Total FHEO inquiries in Gardena represent 0.42 inquiries per 1,000 people. The remaining inquiries did not pertain to a specific basis of discrimination. In two tracts, between 5 and 10 percent of all renters receive housing choice vouchers (HCV) and in five tracts, up to 5 percent of renters receive HCVs. To protect the confidentiality of renters receiving HCVs, tracts containing 10 or fewer voucher holders have been omitted from this dataset. Tracts with higher concentrations of renters receiving HCVs are not generally concentrated in one area in the City. FEHO Inquiries and the concentration of HCV recipients by tract are shown in Figure E-2.

Figure E-1: Regional Public Housing Buildings, FHEO Inquiries, and HCVs



Source: HCD Data Viewer, HUD 2013-2021, 2021.

Figure E-2: Public Housing Buildings, FHEO Inquiries, and HCVs



Source: HCD Data Viewer, HUD 2013-2021, 2021.

Integration and Segregation

Race and Ethnicity

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility.

Dissimilarity indices can be used to measure the evenness of distribution between two groups in an area. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

The following analysis of racial/ethnic segregation also includes racial/ethnic minority population trends, maps of minority concentrated areas over time, and an analysis of the City's sites inventory as it relates to minority (non-White) concentrated areas.

Regional Trend.

As shown in Table E-1, racial/ethnic minority groups make up 73.8 percent of the Los Angeles County population. Nearly half of the Los Angeles County population is Hispanic/Latino (48.5 percent), 26.2 percent of the population is White, 14.4 percent is Asian, and 7.8 percent is Black/African American. Gardena and the adjacent jurisdictions of Carson, Hawthorne, Inglewood, and Lawndale have racial/ethnic minority (non-White) populations exceeding the Countywide average. Of the selected jurisdictions, Carson has the largest racial/ethnic minority population (93 percent), and Torrance has the smallest (62.6 percent).

Table E-1: Racial/Ethnic Composition – L.A. County, Gardena, and Neighboring Cities

	LA County	Gardena	Carson	Hawthorne	Inglewood	Lawndale	Torrance
White	26.2%	9.4%	7.0%	10.3%	4.5%	14.6%	37.4%
Black/African American	7.8%	22.2%	23.5%	24.1%	39.6%	9.7%	2.6%
American Indian/Alaska Native	0.2%	0.1%	0.2%	0.2%	0.3%	0.2%	0.4%
Asian	14.4%	24.7%	26.3%	7.5%	2.0%	10.9%	35.6%
Native Hawaiian/Pacific Islander	0.2%	1.1%	2.6%	0.3%	0.4%	1.0%	0.5%
Some other race	0.3%	0.7%	0.1%	0.5%	0.4%	0.5%	0.3%
Two+ races	2.3%	2.5%	3.0%	2.2%	2.2%	1.6%	4.6%
Hispanic/Latino	48.5%	39.3%	37.3%	54.8%	50.6%	61.5%	18.6%

As discussed previously, HUD's dissimilarity indices can be used to estimate segregation levels over time. Dissimilarity indices for Los Angeles County are shown in

Table E-2. Dissimilarity indices between non-White and White groups indicate that the County has become increasingly segregated since 1990. Segregation between Black and White communities has decreased, while segregation between Hispanic and Asian/Pacific Islander communities and White communities has increased. According to HUD's thresholds, all White and non-White communities in Los Angeles County are highly segregated.

Table E-2: Racial/Ethnic Dissimilarity Trends – Los Angeles County

	1990	2000	2010	2020
Non-White/White	56.66	56.72	56.55	58.53
Black/White	73.04	67.40	64.99	68.24
Hispanic/White	60.88	63.03	63.35	64.33
Asian or Pacific Islander/White	46.13	48.19	47.62	51.59

Source: U.S. Department of Housing and Urban Development (HUD) Affirmatively Furthering Fair Housing (AFFH) Database, 2020.

Figure E-3 shows that most areas in Los Angeles County have high concentrations of racial/ethnic minorities. Coastal cities, including Santa Monica and Redondo Beach, and the areas surrounding Beverly Hills, West Hollywood, Burbank, and the Pacific Palisades neighborhood generally have smaller non-White populations. Most block groups in the South Bay, San Gabriel Valley, San Fernando Valley and central Los Angeles areas have majority racial/ethnic minority populations. Gardena's racial/ethnic minority populations are comparable to surrounding jurisdictions. Coastal communities such as Hermosa Beach and Redondo Beach tend to have smaller racial/ethnic minority populations. Communities southeast of Gardena, such as Lakewood, also have fewer racial/ethnic minorities.

Local Trend.

According to the 2015-2019 ACS, 90.6 percent of the Gardena population belongs to a racial or ethnic minority group, a slight increase from 90.4 percent during the 2006-2010 ACS. In comparison, only 73.8 percent of Los Angeles County residents belong to a racial or ethnic minority group. The Black/African (22.2 percent), Asian (24.7 percent), and Native Hawaiian/Pacific Islander (1.1 percent) populations make up a larger share of the Gardena population compared to the County. Approximately 39 percent of the population is Hispanic/Latino, less than countywide (see **Table E-1**).

Table E-3 shows the change in racial/ethnic composition in Gardena using the 2006-2010 and 2015-2019 ACS. The racial/ethnic composition in Gardena has remained relatively constant. The White and Asian populations have decreased slightly, while the Hawaiian/Pacific Islander, Hispanic/Latino, and multi-racial populations have grown incrementally.

Table E-3: Change in Racial/Ethnic Composition – Gardena (2010-2019)

Race/Ethnicity	2010		2019	
	Persons	Percent	Persons	Percent
White	5,648	9.6%	5,610	9.4%
Black/African American	13,009	22.2%	13,279	22.2%
American Indian/Alaska Native	74	0.1%	59	0.1%
Asian	16,257	27.7%	14,721	24.7%
Native Hawaiian/Pac. Islander	489	0.8%	664	1.1%
Some other race	318	0.5%	406	0.7%
Two or more races	1,387	2.4%	1,497	2.5%
Hispanic/Latino	21,486	36.6%	23,473	39.3%
Total	58,668	100.0%	59,709	100.0%

Source: 2015-2019 and 2006-2010 ACS (5-Year Estimates).

Dissimilarity between non-White and White communities in Gardena has worsened since 1990. Dissimilarity between Hispanic/White and Asian or Pacific Islander/White communities has increased, while dissimilarity between Black and White communities has declined. Based on HUD's definition of the various levels of the index, segregation between Hispanic/White and Asian or Pacific Islander/White Gardena residents is low. However, Black/White communities are highly segregated. Compared to the County as a whole, Gardena is less segregated.

Table E-4: Racial/Ethnic Dissimilarity Trends – Gardena

	1990	2000	2010	2020
Non-White/White	22.15	28.95	27.16	30.54
Black/White	59.96	53.30	53.26	54.68
Hispanic/White	20.38	28.94	27.99	33.35
Asian or Pacific Islander/White	22.38	23.68	24.52	27.95

Source: U.S. Department of Housing and Urban Development (HUD) Affirmatively Furthering Fair Housing (AFFH) Database, 2020.

Figure E-4 and Figure E-5 compare racial or ethnic minority concentrations in 2010 and 2018. In nearly all block groups in Gardena, racial/ethnic minorities make up more than 80 percent of the population. Consistent with this trend citywide, there has been an increase in racial/ethnic minority populations in block groups along the northern and western City boundaries since 2010.

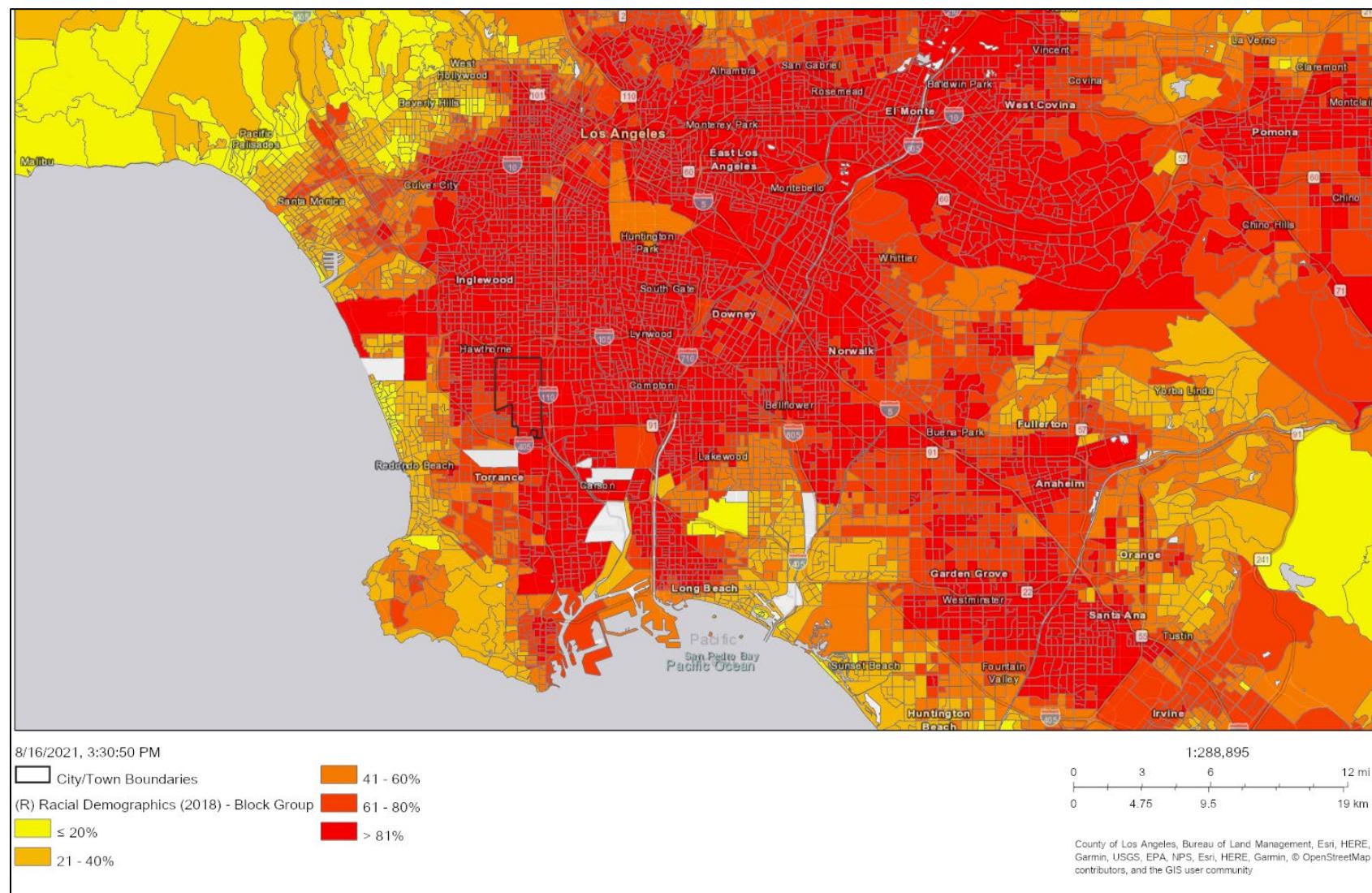
Sites Inventory. Figure E-5 also shows the sites inventory used to meet Gardena's 2021-2029 RHNA. The RHNA sites are generally evenly distributed throughout the city. The sites inventory and RHNA is described in depth in Chapter IV, Housing Resources, of this Housing Element. As discussed previously, nearly all Gardena block groups have racial/ethnic minority concentrations exceeding 81 percent. Approximately 98 percent of RHNA units, including 99 percent of lower income units, 96.3 percent of moderate income units, and 98.8 percent of above moderate income units, are in block groups

where racial/ethnic minority groups make up more than 81 percent of the population (Table E-5).

Table E-5: Breakdown of RHNAs by Racial/Ethnic Minority Concentration

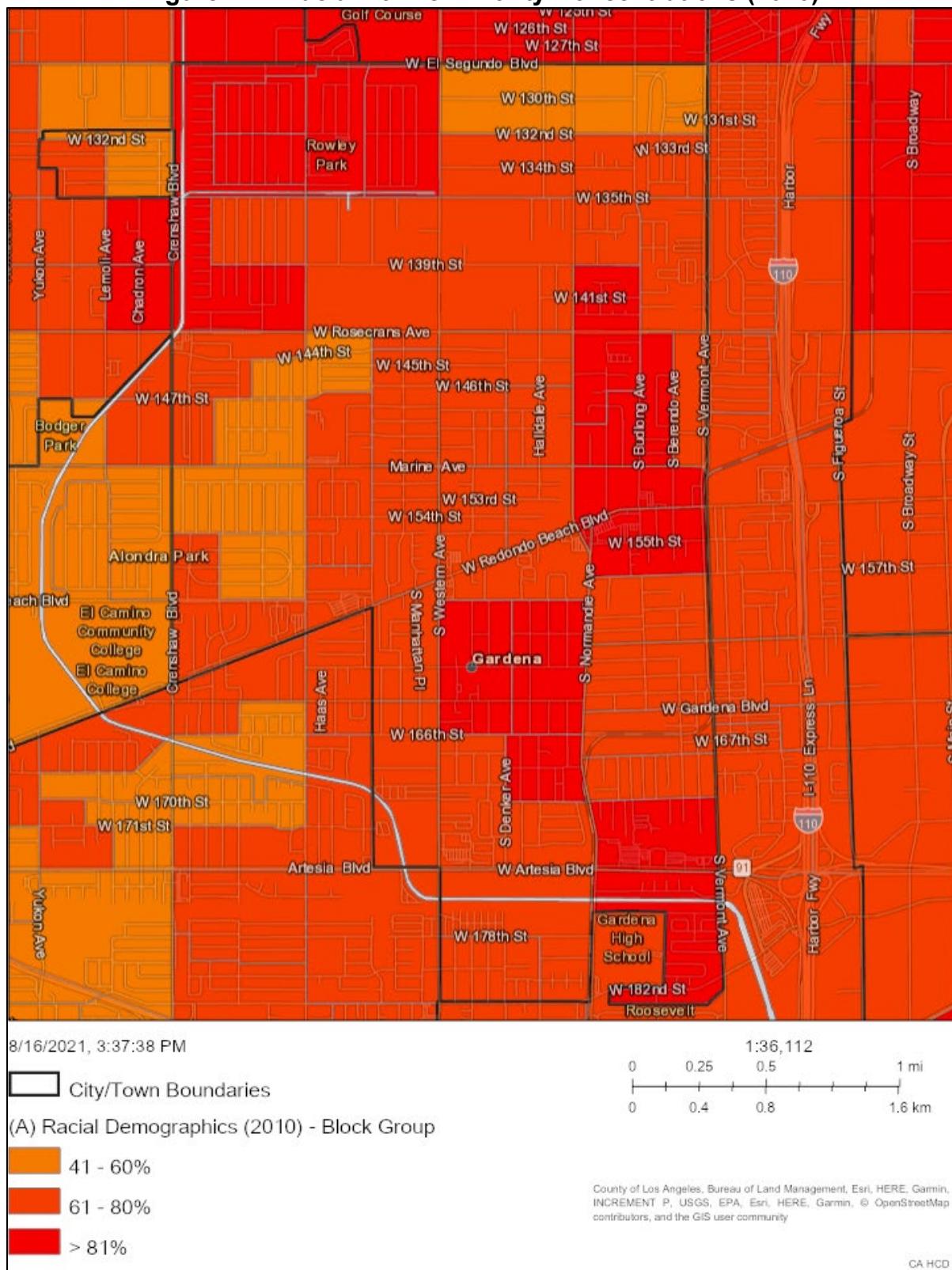
Racial/Ethnic Minority Population (Block Group)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNAs	
61-80%	27	1.0%	67	3.7%	26	1.2%	120	1.8%
>81%	2,609	99.0%	1,730	96.3%	2,127	98.8%	6,466	98.2%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

Figure E-3: Regional Racial/Ethnic Minority Concentrations (2018)



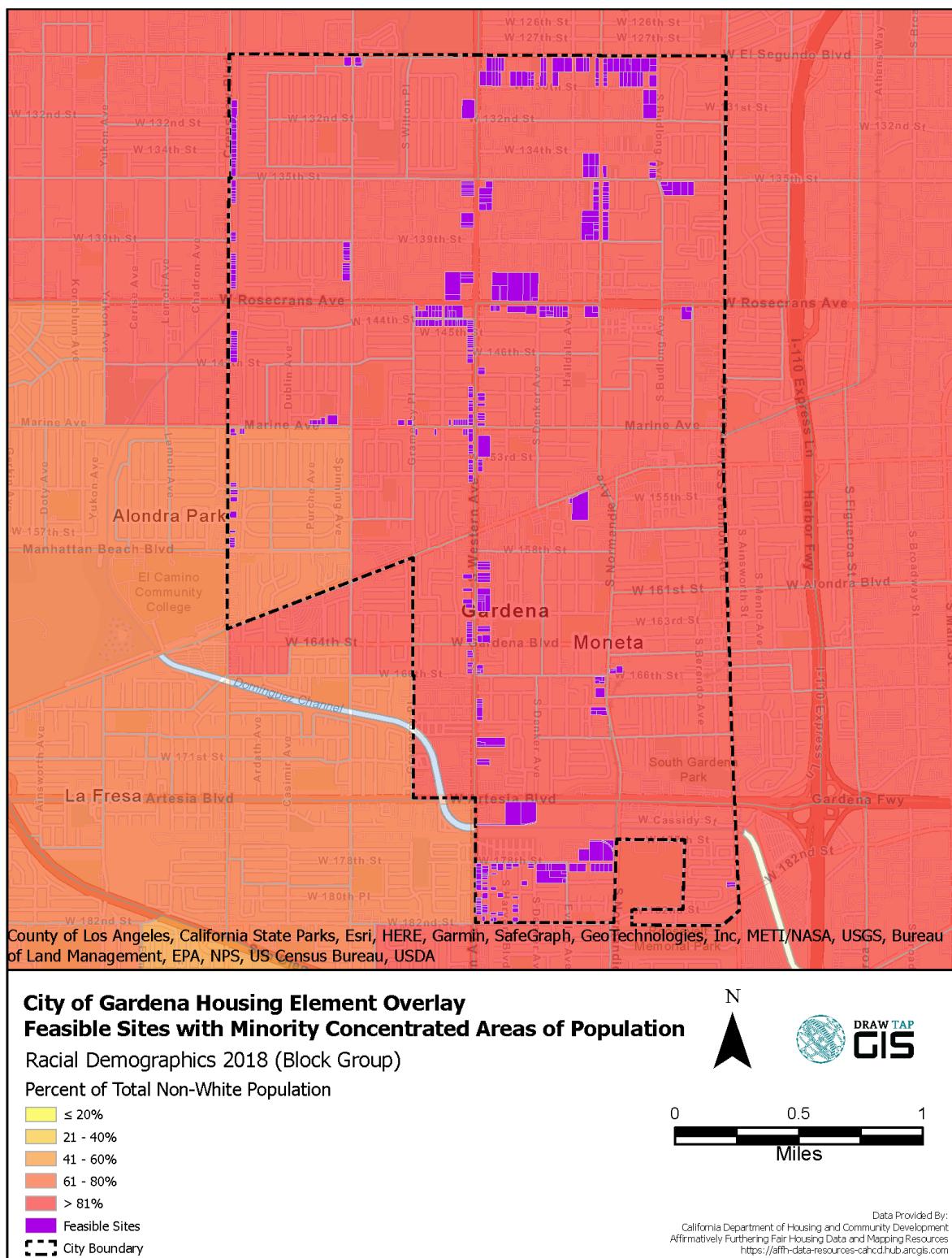
Source: HCD AFFH Data Viewer, 2021.

Figure E-4: Racial/Ethnic Minority Concentrations (2010)



Source: HCD AFFH Data Viewer, 2021

Figure E-5: Minority Concentrations (2018) and RHNA Sites



Source: HCD AFFH Data Viewer, 2021.

Disability

Persons with disabilities have special housing needs because of their fixed income, the lack of accessible and affordable housing, and the higher health costs associated with their disability.

Regional Trend. According to the 2015-2019 ACS, 9.9 percent of Los Angeles County residents experience a disability. Gardena has a larger population of persons with disabilities (12.9 percent) compared to the County, and the neighboring cities of Hawthorne (9.6 percent), Lawndale (9.4 percent), and Torrance (9 percent). Gardena has a similar share of persons with disabilities compared to Carson and Inglewood, where 12.2 percent and 12.5 percent of the population experiences a disability, respectively.

As shown in Figure E-6, less than 20 percent of the population in most tracts in Los Angeles County are persons with disabilities. Tracts with disabled populations exceeding 20 percent are not concentrated in one area of the County. Tracts with larger shares of persons with disabilities closest to Gardena are in Inglewood, Long Beach, and the City of Los Angeles. The concentration of persons with disabilities in Gardena is generally comparable to neighboring jurisdictions. The coastal cities of Manhattan Beach, Hermosa Beach, and Redondo Beach tend to have smaller disabled populations compared to Gardena, Compton, and Inglewood.

Local Trend. Since the 2008-2012 ACS, the disabled population in Gardena increased slightly from 10.2 percent to 12.9 percent during the 2015-2019 ACS. Ambulatory difficulties and independent living difficulties are the most common disability type in Gardena; 7.4 percent of residents experience an ambulatory difficulty and 6.7 percent experience an independent living difficulty. Gardena's population of persons with disabilities exceeds the countywide share due to the City's elderly population. Approximately 17 percent of the Gardena population is age 65 or older compared to only 13 percent countywide. Over half of the population aged 75 and older in Gardena experiences a disability.

Figure E-7 shows that census tracts with a higher percentage of persons with disabilities are not concentrated in one area in Gardena. Tracts with a disabled population below 10 percent are located in the northeastern section of the City and in one tract along the western boundary. The remaining tracts have a disabled population between 10 and 20 percent.

Sites Inventory. Figure E-7 also includes the sites inventory used to meet Gardena's 2021-2029 RHNA. Table E-6 shows the distribution of RHNA units by population of persons with disabilities. Of all RHNA units, 99 percent are in tracts where 10 to 20 percent of the population experience a disability, including 100 percent of lower income units, 96.8 percent of moderate income units, and 99.7 percent of above moderate income units.

Table E-6: Breakdown of RHNAs by Population of Persons with Disabilities

Disabled Population (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNAs Units	
<10%	0	0.0%	58	3.2%	6	0.3%	64	1.0%
10-20%	2,636	100.0%	1,739	96.8%	2,147	99.7%	6,522	99.0%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

Figure E-6: Regional Concentration of Persons with Disabilities (2019)

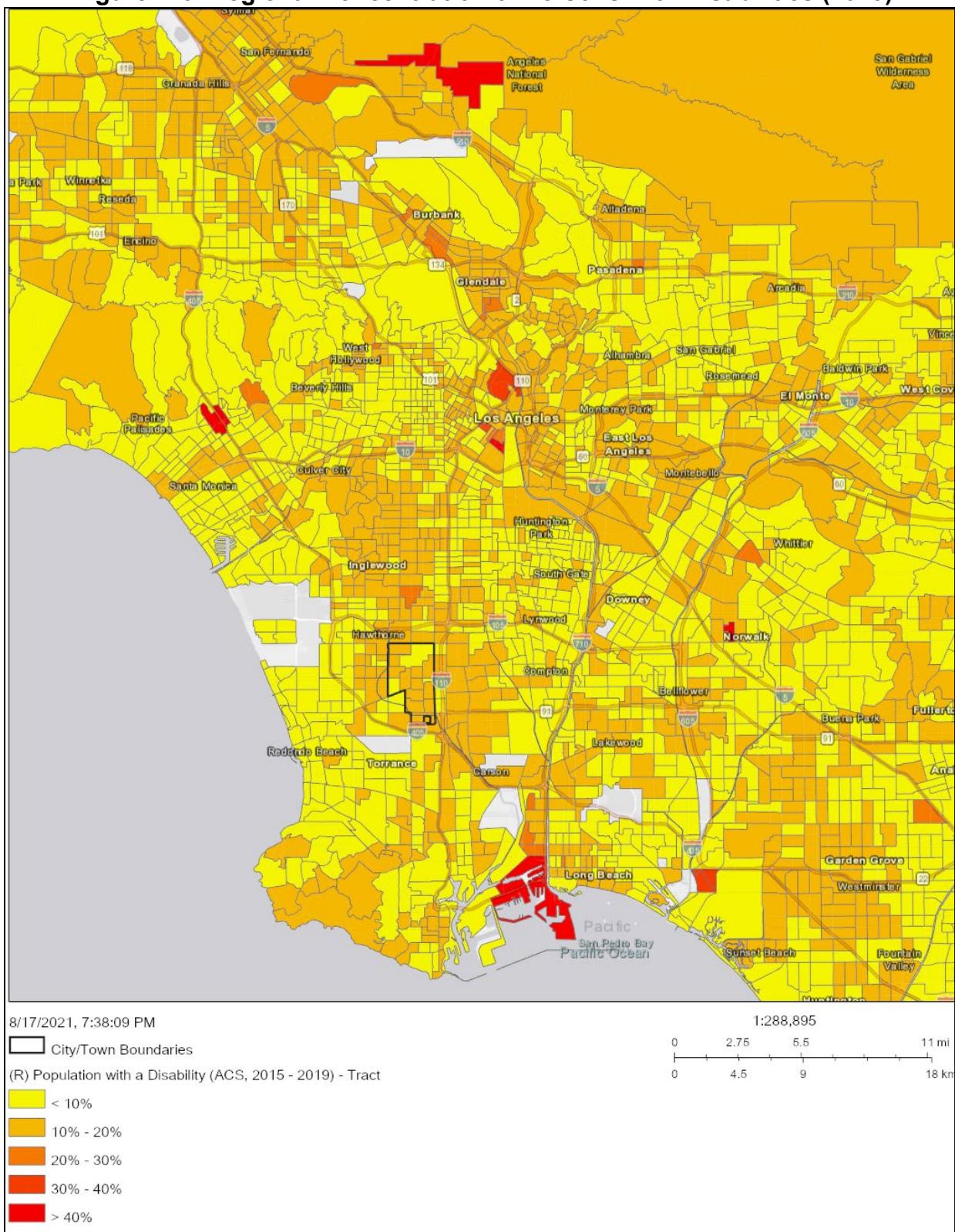
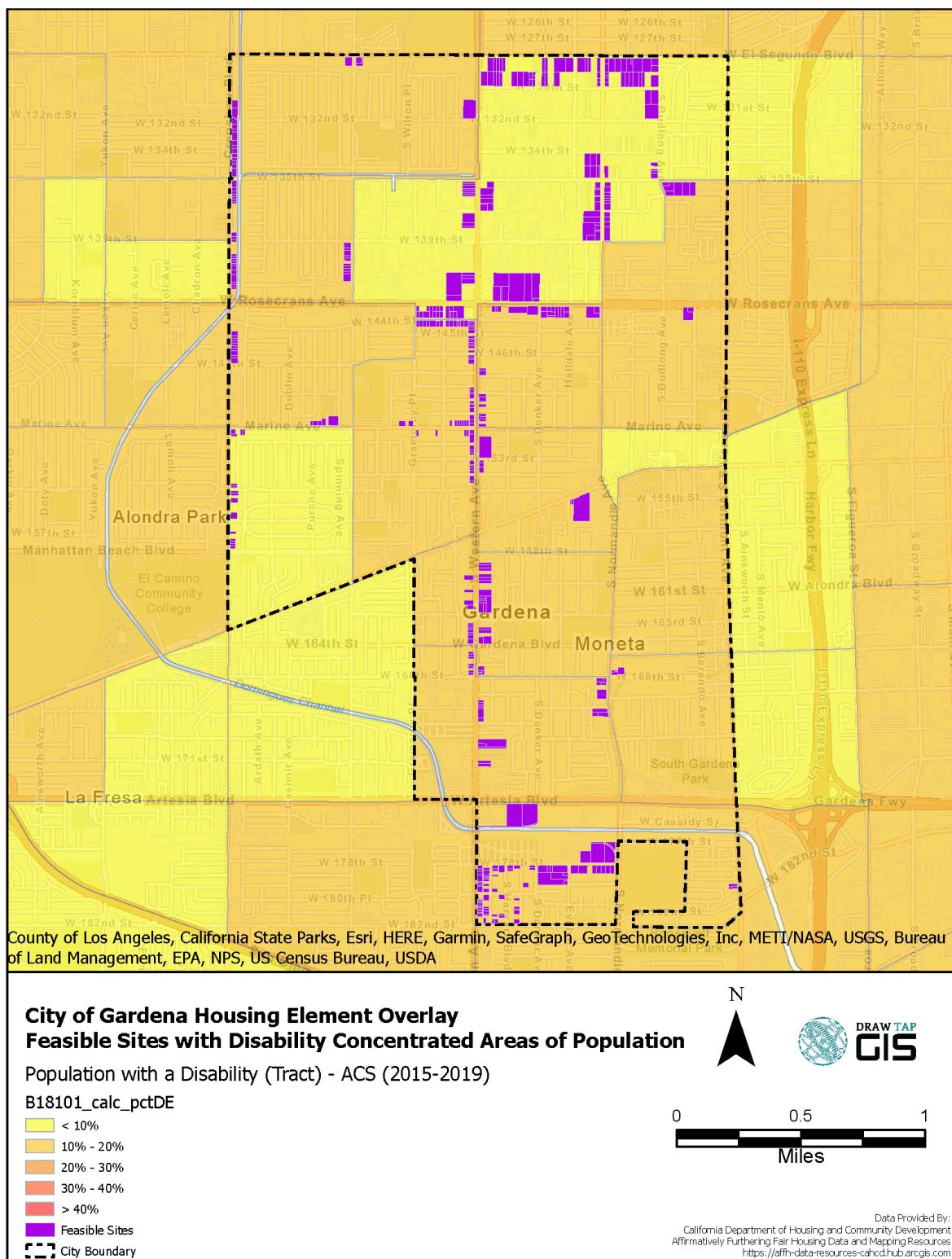


Figure E-7: Concentration of Persons with Disabilities and Sites Inventory (2019)



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

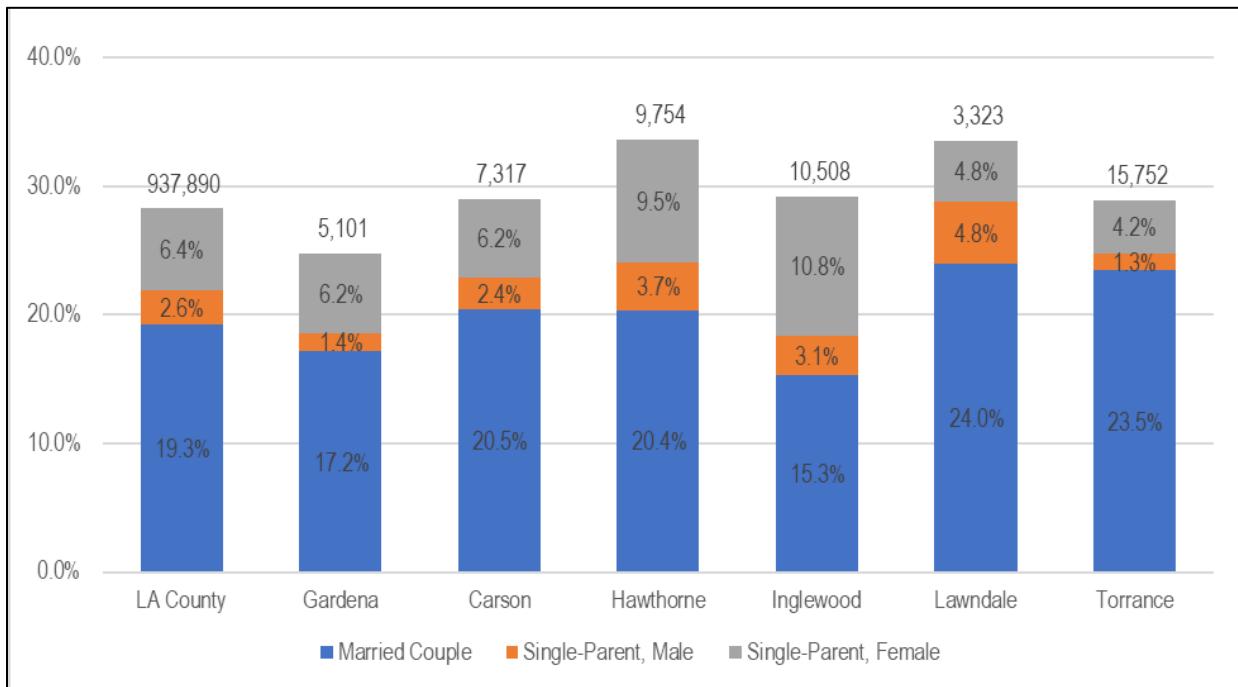
Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. Single parent households are also protected by fair housing law.

Regional Trend. Approximately 25 percent of Gardena households have one or more child under the age of 18. The City's share of households with children is lower than the County, and the neighboring cities of Carson, Hawthorne, Inglewood, Lawndale, and Torrance (Figure E-8). Of the selected jurisdictions, Inglewood has the highest proportion of single-parent households representing 13.9 percent of all households in the City, while only 5.5 percent of households in Torrance are single-parent households.

More than 60 percent of children in most areas around Rolling Hills, Burbank, Redondo Beach, and the Pacific Palisades neighborhood live in married couple households (Figure E-9). Figure E-10 shows percent of children living in single-parent female-headed households by tract. Children in female-headed households are most concentrated in the area north of Gardena, including Inglewood, the City of Los Angeles, and unincorporated Los Angeles County communities, and the areas around Long Beach and Lakewood. In general, there are more children living in female-headed households in the central Los Angeles County areas compared to the South Bay, Westside, Gateway, San Fernando Valley, and San Gabriel Valley cities.

Figure E-8: Housing Type Composition – Households with Children



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

Local Trend. Gardena has seen a significant decrease in households with children. During the 2006-2010 ACS, there were 6,351 households with children representing 30.2 percent of all City households. The most recent 2015-2019 ACS estimates there is now only 5,101 households with children in Gardena representing 24.7 percent of total households. Approximately 8 percent of households in the City are single-parent households including 6.2 percent female-headed single-parent households. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services.

As shown in Figure E-11, between 60 percent and 80 percent of children live in married couple households in most Gardena tracts. More than 80 percent of children live in married couple households in one tract along the western City boundary, and only 40 percent to 60 percent of children live in married couple households in two tracts on the central eastern side of the City. Figure E-11 shows that the percent of children in female-headed households is also generally uniform throughout Gardena. There is a slightly larger population of children in female-headed households in the northern half of the City compared to the southern half. In the northern tracts, 20 percent to 40 percent of children live in female-headed households, compared to less than 20 percent of children in the southern areas of the City.

Sites Inventory. Table E-7 and Table E-8 show the breakdown of RHNA units by percent of children living in married couple and female-headed households. Most units, regardless of income category, are in tracts where 60 percent to 80 percent of children

live in married couple households. A slightly higher percentage of lower income units are in tracts where more than 20 percent of children live in female-headed households compared to moderate and above moderate income units.

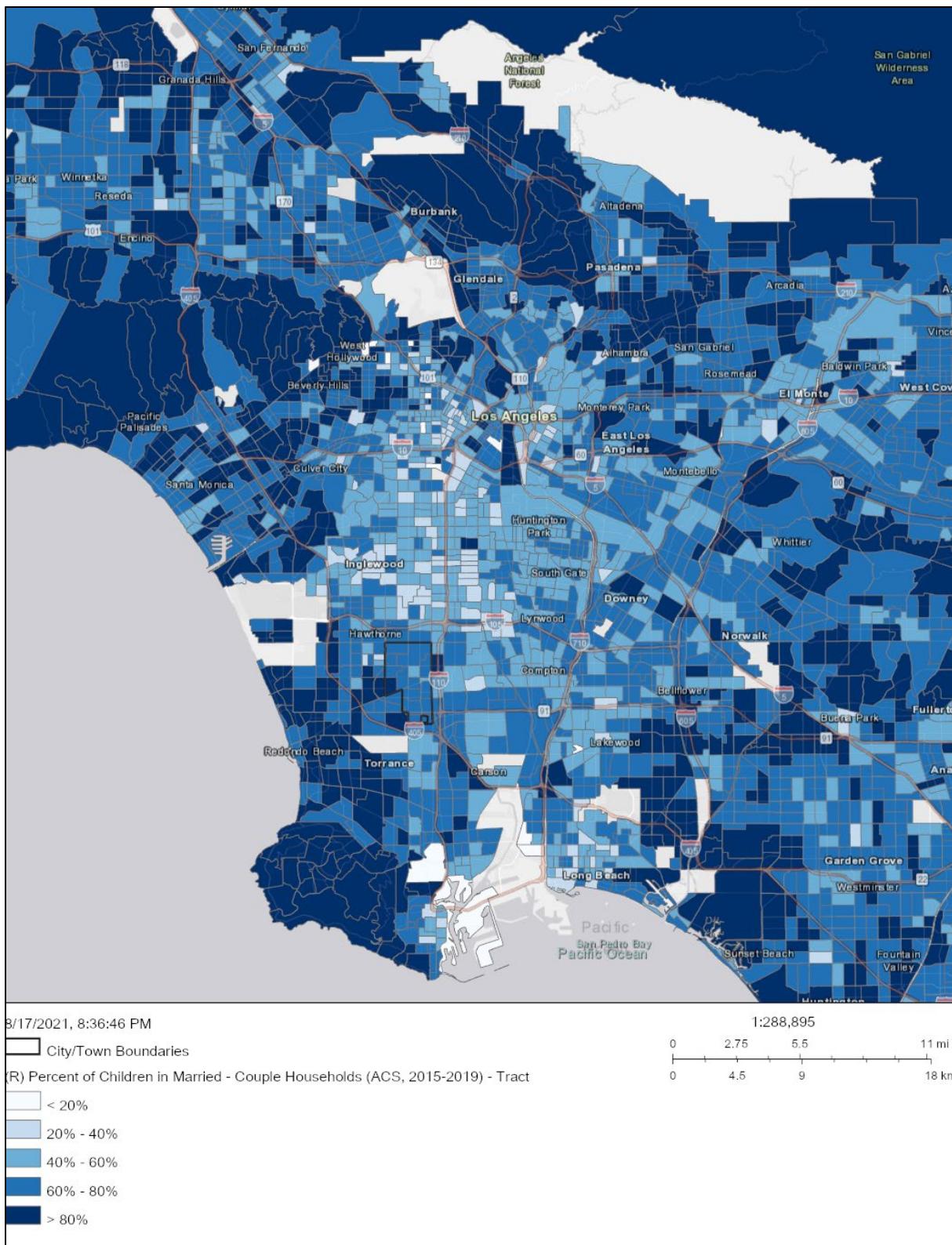
Table E-7: Distribution of RHNAs by Children in Married Couple Households

Children in Married Couple Households (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNAs	
40-60%	232	8.8%	69	3.8%	163	7.6%	464	7.0%
60-80%	2,404	91.2%	1,670	92.9%	1,984	92.2%	6,058	92.0%
>80%	0	0.0%	60	3.3%	6	0.3%	66	1.0%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

Table E-8: Distribution of RHNAs by Children in Female-Headed Households

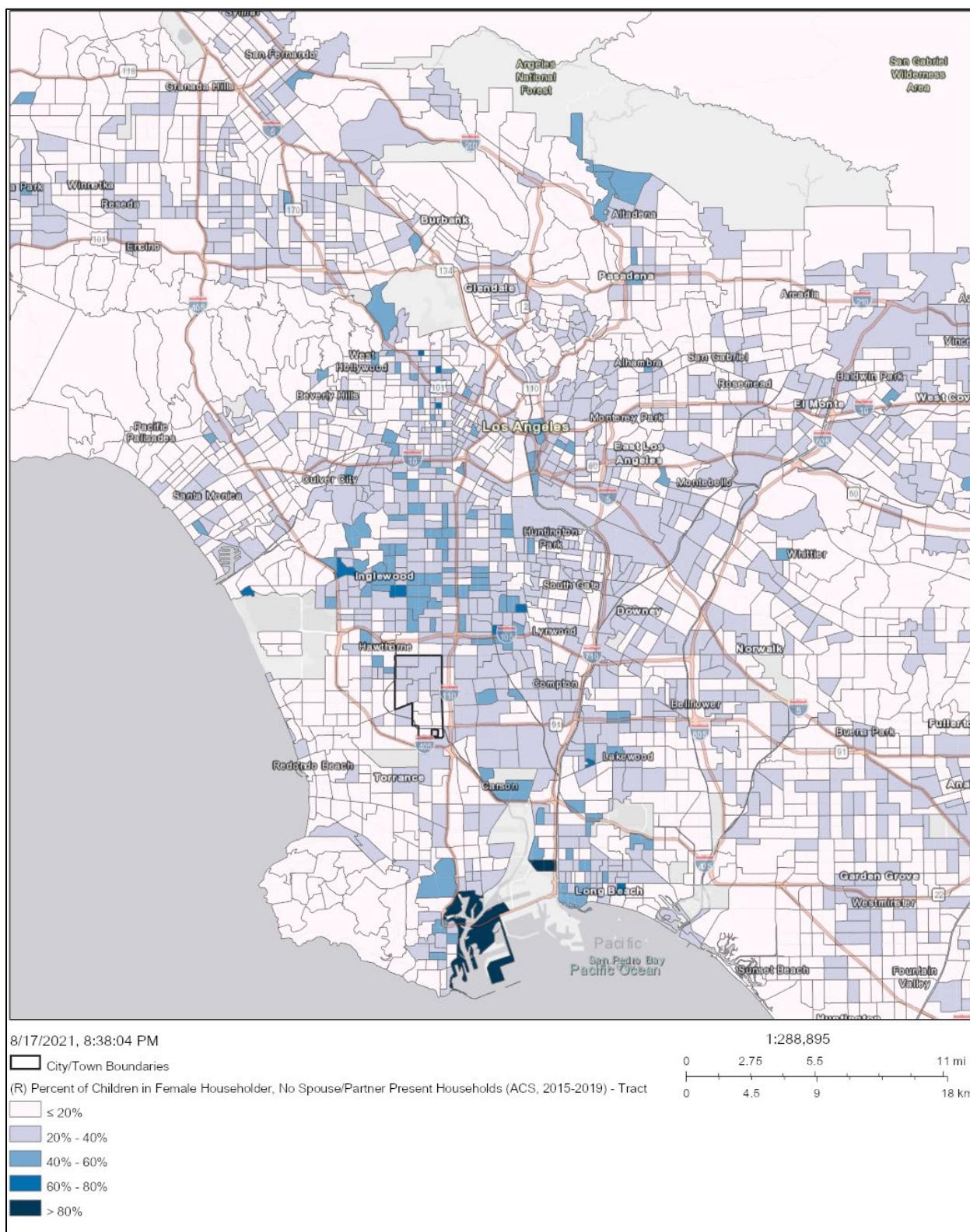
Children in Female-Headed Households (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNAs	
<20%	612	23.2%	460	25.6%	650	30.2%	1,722	26.1%
20-40%	2,024	76.8%	1,337	74.4%	1,503	69.8%	4,864	73.9%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

Figure E-9: Regional Percent of Children in Married Couple Households (2019)



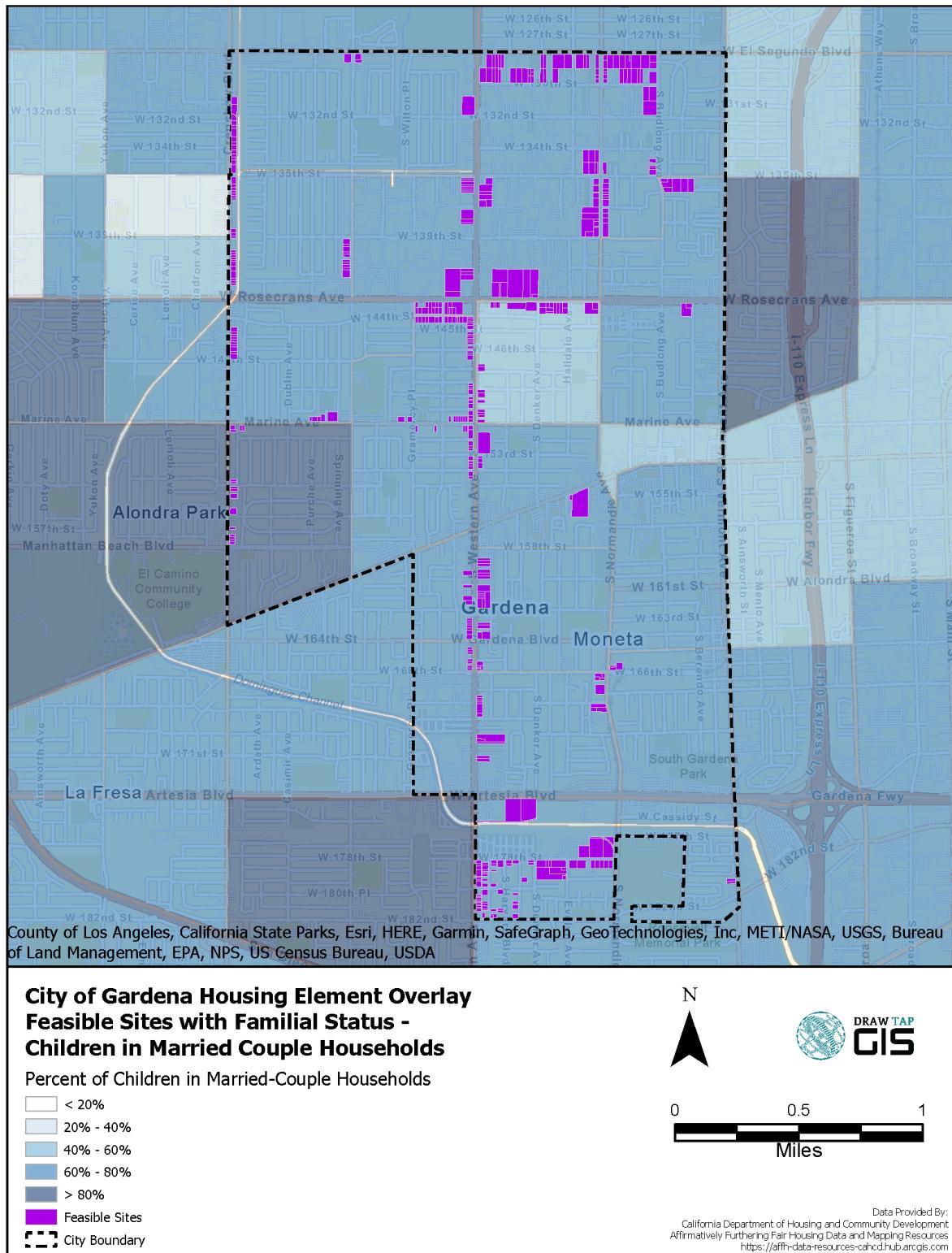
Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Figure E-10: Regional Percent of Children in Female-Headed Households (2019)



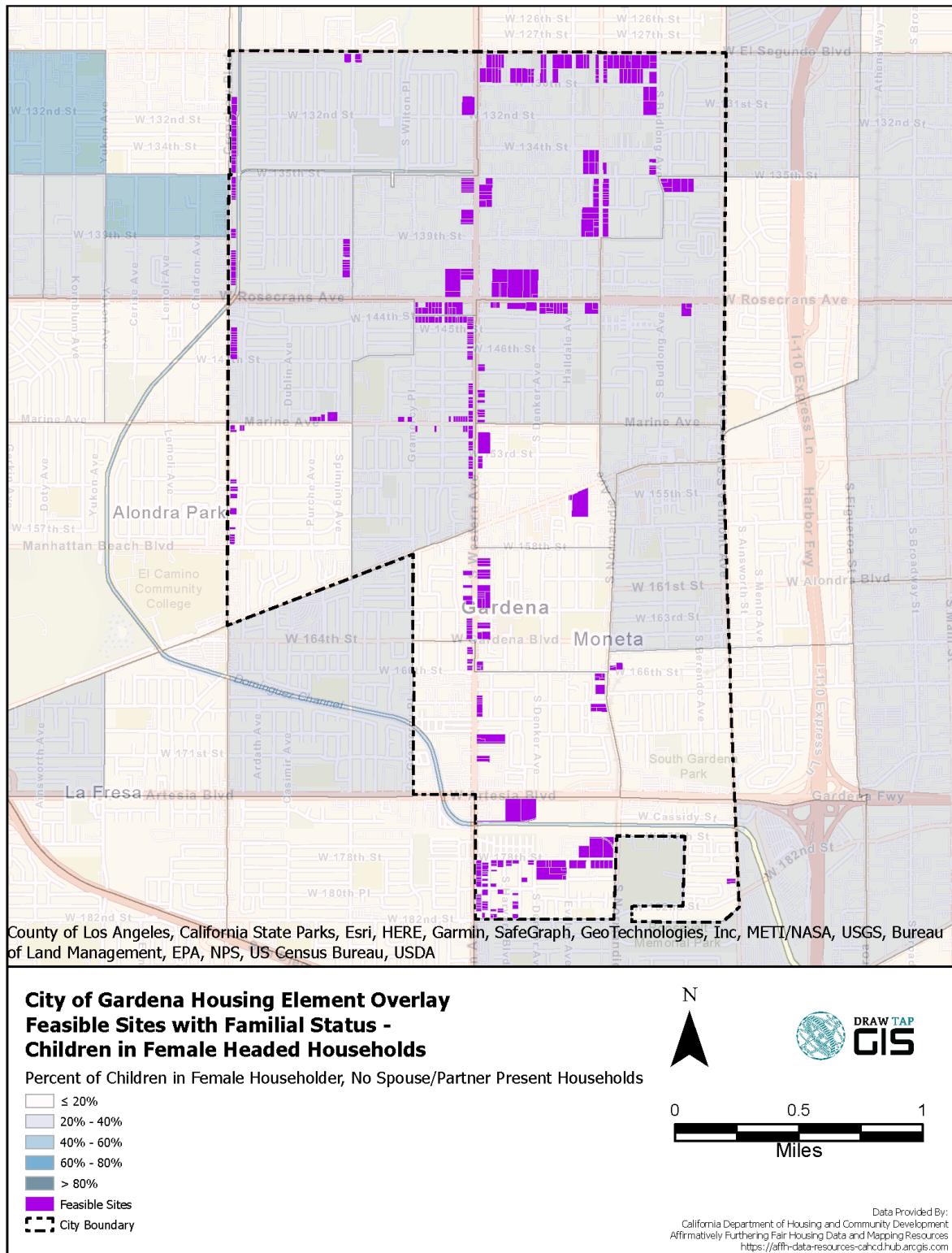
Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Figure E-11: Children in Married Couple Households and Sites Inventory (2019)



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Figure E-12: Children in Female-Headed Households and Sites Inventory (2019)



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Income

Identifying low- or moderate-income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a census tract or block group where over 51 percent of the population is LMI (based on HUD's income definition of up to 80 percent of the AMI).

Regional Trend. HUD's CHAS data, presented in Table E-9, shows that 58.5 percent of Gardena residents earn 80 percent or less than the area median family income and are considered lower income, compared to 51.6 percent Countywide. According to the 2015-2019 ACS, the median household income in Gardena is \$58,447. The median income in Gardena is lower than the median in the County (\$68,044) and the neighboring jurisdictions of Carson, Lawndale, and Torrance, but higher than Hawthorne and Inglewood.

Table E-9: Income Level Distribution

Income Category	Gardena		Los Angeles County	
	Households	Percent	Households	Percent
<30% AMI	4,260	20.6%	641,055	19.5%
31-50% AMI	3,795	18.4%	482,070	14.6%
51-80% HAMFI	4,025	19.5%	578,285	17.5%
81-100% HAMFI	2,265	11.0%	312,595	9.5%
>100% HAMFI	6,305	30.5%	1,281,195	38.9%
Total	20,650	100.0%	3,295,200	100.0%

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

Figure E-13 shows LMI areas regionally. Coastal cities, from Rancho Palos Verdes to El Segundo and the Pacific Palisades neighborhood have low concentrations of LMI households. In most tracts, less than 25 percent of the population is LMI in these areas. LMI households are most concentrated in the central Los Angeles County region around the City of Los Angeles. There are smaller concentrations of LMI households in and around the cities of Glendale, El Monte, San Fernando, and Long Beach. Communities north and east of Gardena have similar LMI concentrations consistent with the City.

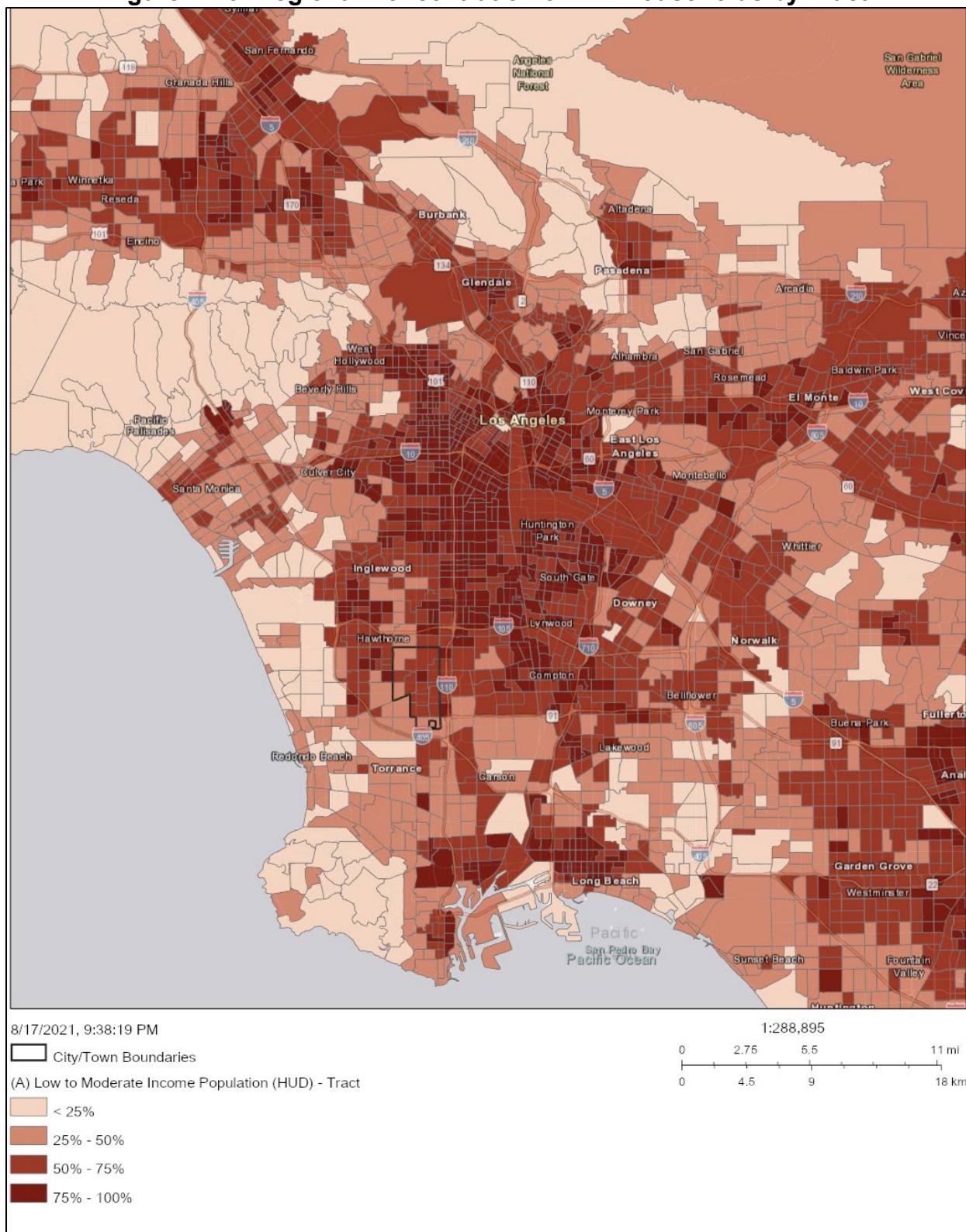
Local Trend. Figure E-14 shows the LMI populations in Gardena block groups. Block groups in Gardena with higher LMI populations are most concentrated in the central and northeastern areas of the City. Most Gardena block groups have LMI populations that make up 50 percent and 75 percent of the block group population. There are six block groups where more than 75 percent of the population is LMI: two in the northeastern corner along W. El Segundo Boulevard, three in the center of the City between W. Rosecrans Avenue and Marine Avenue, and one in the southern area at the intersection of S. Western Avenue and W. 166th street. Less than 50 percent of households are LMI in most block groups along the eastern and southern City boundaries

Sites Inventory. As shown in Figure E-14 and Table E-10, more than half of all units used to meet the City's 2021-2029 RHNA are in block groups where LMI households make up 50 percent to 75 percent of the population. A higher percentage of lower income RHNA units are in block groups where more than 50 percent of the population is LMI (94.7 percent of units), compared to 88.6 percent of moderate income units and 83 percent of above moderate income units.

Table E-10: Distribution of RHNA Units by LMI Household Population

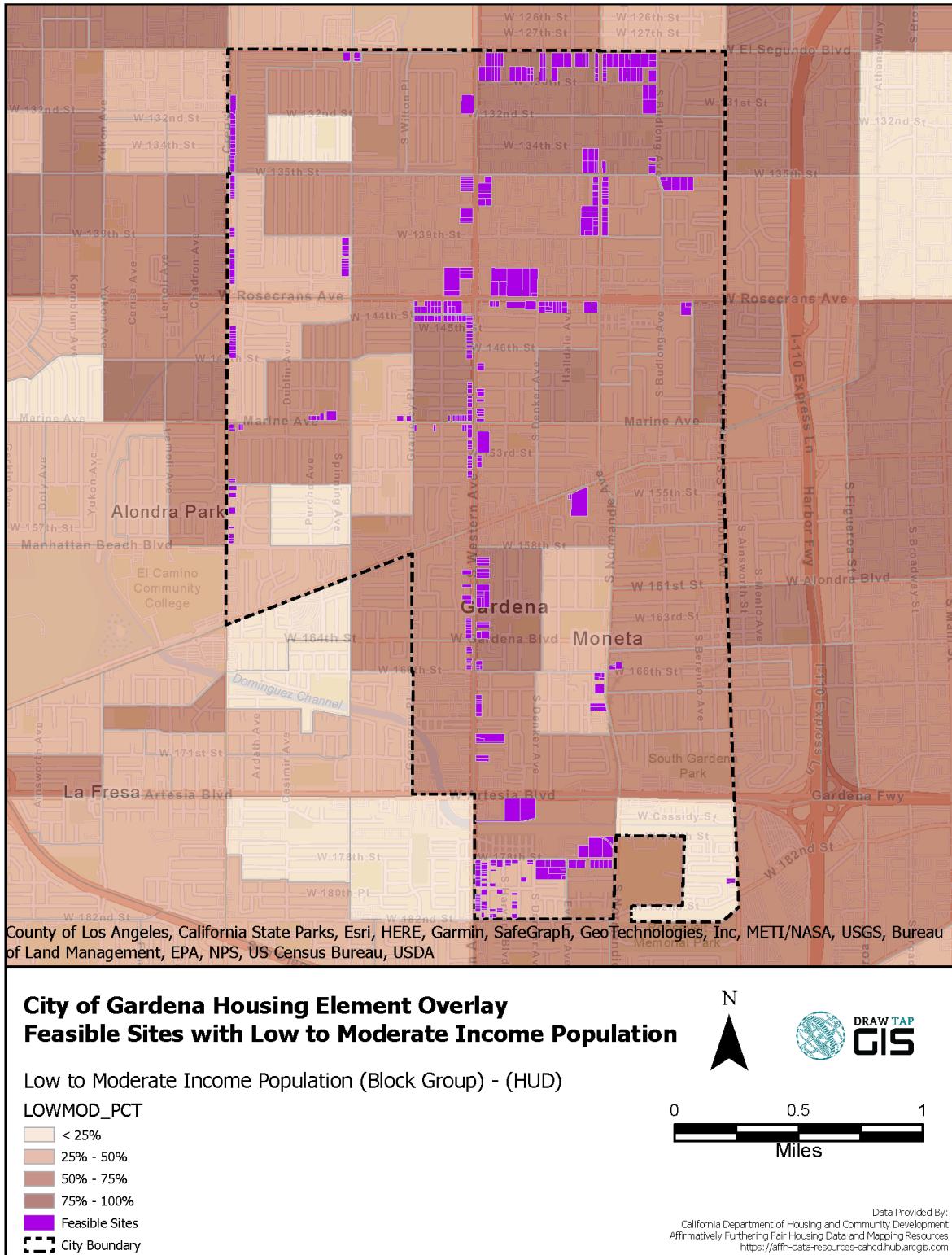
LMI Population (Block Group)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
<25%	0	0.0%	0	0.0%	8	0.4%	8	0.1%
25-50%	141	5.3%	205	11.4%	358	16.6%	704	10.7%
50-75%	1,635	62.0%	1,060	59.0%	1,165	54.1%	3,860	58.6%
75-100%	860	32.6%	532	29.6%	622	28.9%	2,014	30.6%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

Figure E-13: Regional Concentration of LMI Households by Tract



Source: HCD AFFH Data Viewer, HUD LMI data (2011-2015 ACS), 2021.

Figure E-14: Concentration of LMI Households and Sites Inventory



Source: HCD AFFH Data Viewer, HUD LMI data (2011-2015 ACS), 2021.

Summary of Fair Housing Issues

Racial/ethnic minorities make up more than 80 percent of the population in nearly all Gardena block groups. Racial/ethnic minority groups are generally the same citywide. A slightly larger proportion of moderate income units are in the block groups where 61-80 percent of the population belongs to a racial/ethnic minority group compared to lower income and above moderate income units.

Gardena has a large population of persons with disabilities and seniors compared to the County. Disabled populations are not concentrated in one area of the City. Almost all units used to meet the lower income RHNAs are in tracts where 10 percent to 20 percent of the population is disabled.

Between 60 percent and 80 percent of children live in married couple households in most Gardena tracts. In the tract where more than 80 percent of children live in married couple households (western boundary along W. Redondo Beach Boulevard), racial/ethnic minorities make up between 60 percent and 80 percent of the population, less than the rest of the City (see Figure E-5 and Figure E-11). All northern City tracts have more children living in female-headed households compared to the southern tracts. Most lower income units used to meet the RHNAs are in tracts where more than 20 percent of children live in female-headed households.

More than 50 percent of the population is LMI in most Gardena block groups. LMI concentrated block groups in northern Gardena also have more children living in female-headed households (see Figure E-12 and Figure E-14). Up to 15 percent of renters in tracts along the eastern side of Marine Avenue, where more than 75 percent of the population is LMI in some block groups, receive HCVs. There are no HCV recipients in the northeastern and southern block groups, despite the LMI population exceeding 75% (see Figure E-2).¹ A larger proportion of lower income RHNAs are in block groups with high concentrations of LMI households compared to moderate and above moderate income units.

Racially and Ethnically Concentrated Areas of Poverty

Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD identified census tracts with a majority non-White population with a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. HCD and the California Tac Credit Allocation Committee (TCAC) convened as the Fair Housing Task Force to create opportunity

¹ To protect the confidentiality of renters receiving HCVs, tracts containing 10 or fewer voucher holders have been omitted from the HCV dataset.

maps. The maps include identifying areas of high segregation and poverty. TCAC Opportunity Maps are discussed in more detail in Section 4 of this fair housing analysis.

Regional Trend. Approximately 15 percent of the County population is below the federal poverty level (Table E-11). Black/African American, American Indian/Alaska Native, persons of a race not listed, and Hispanic/Latino populations all experience poverty at a higher rate than the average countywide. The proportion of non-Hispanic White residents under the poverty level is the lowest compared to other racial/ethnic groups in the County. Over 21 percent of persons with disabilities are also below the poverty level.

Table E-11: Poverty Status by Race/Ethnicity and Disability

	Percent Below Poverty Level	
	Gardena	LA County
Black or African American	13.8%	20.8%
American Indian and Alaska Native	5.7%	18.1%
Asian	10.0%	11.1%
Native Hawaiian and Other Pacific Islander	0.0%	11.5%
Some other race	18.6%	19.2%
Two or more races	11.7%	11.7%
Hispanic or Latino (of any race)	16.2%	18.1%
White alone, not Hispanic or Latino	14.3%	9.6%
With a disability	18.3%	21.2%
Population for whom poverty status is determined	13.7%	14.9%

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

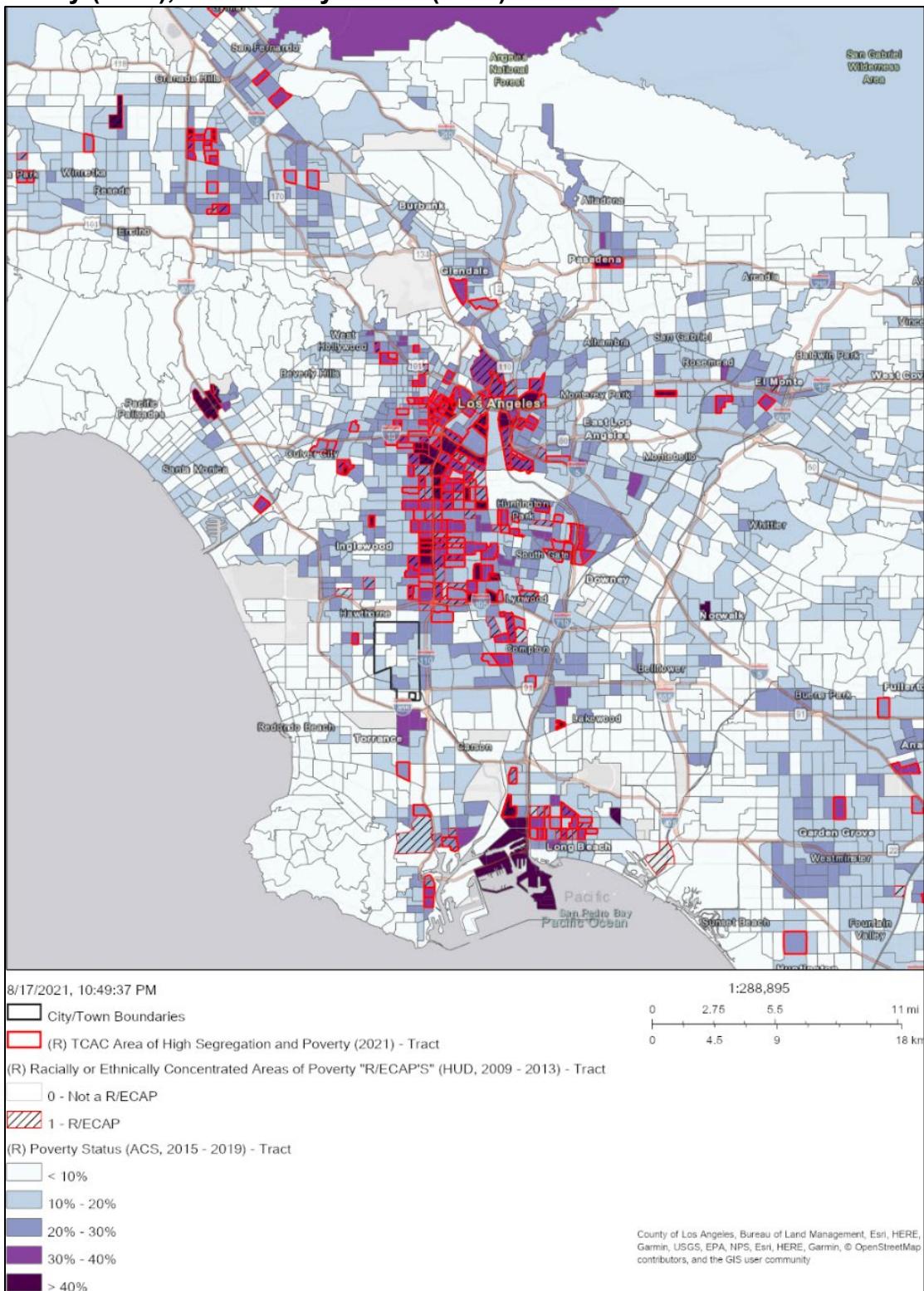
Figure E-15 shows R/ECAPs, TCAC designated areas of high segregation and poverty, and poverty status in the Los Angeles County region. R/ECAPs and areas of high segregation and poverty are concentrated in the central County areas around the City of Los Angeles. Areas of high segregation and poverty have also been identified in tracts south and north of Gardena in Torrance, Hawthorne, and Inglewood. Tracts with larger populations of persons experiencing poverty are also concentrated in these areas.

Local Trend. As shown in Table E-11 above, 13.7 percent of the Gardena population is below the poverty level, a few than the County as a whole. Black/African American, persons of a race not listed, persons of two or more races, non-Hispanic White, and Hispanic/Latino populations all experience poverty at a higher rate than the average citywide. All racial/ethnic minority groups in Gardena have lower poverty rates than the County. Over 18 percent of persons with disabilities are below the poverty level.

According to HCD's 2021 Data Viewer, there are no R/ECAPs or TCAC designated areas of high segregation and poverty in Gardena. Poverty status in Gardena by tract is presented in Figure E-16. Less than 20 percent of the population in most Gardena tracts is under the poverty level. There are two tracts where 20 percent to 30 percent of the

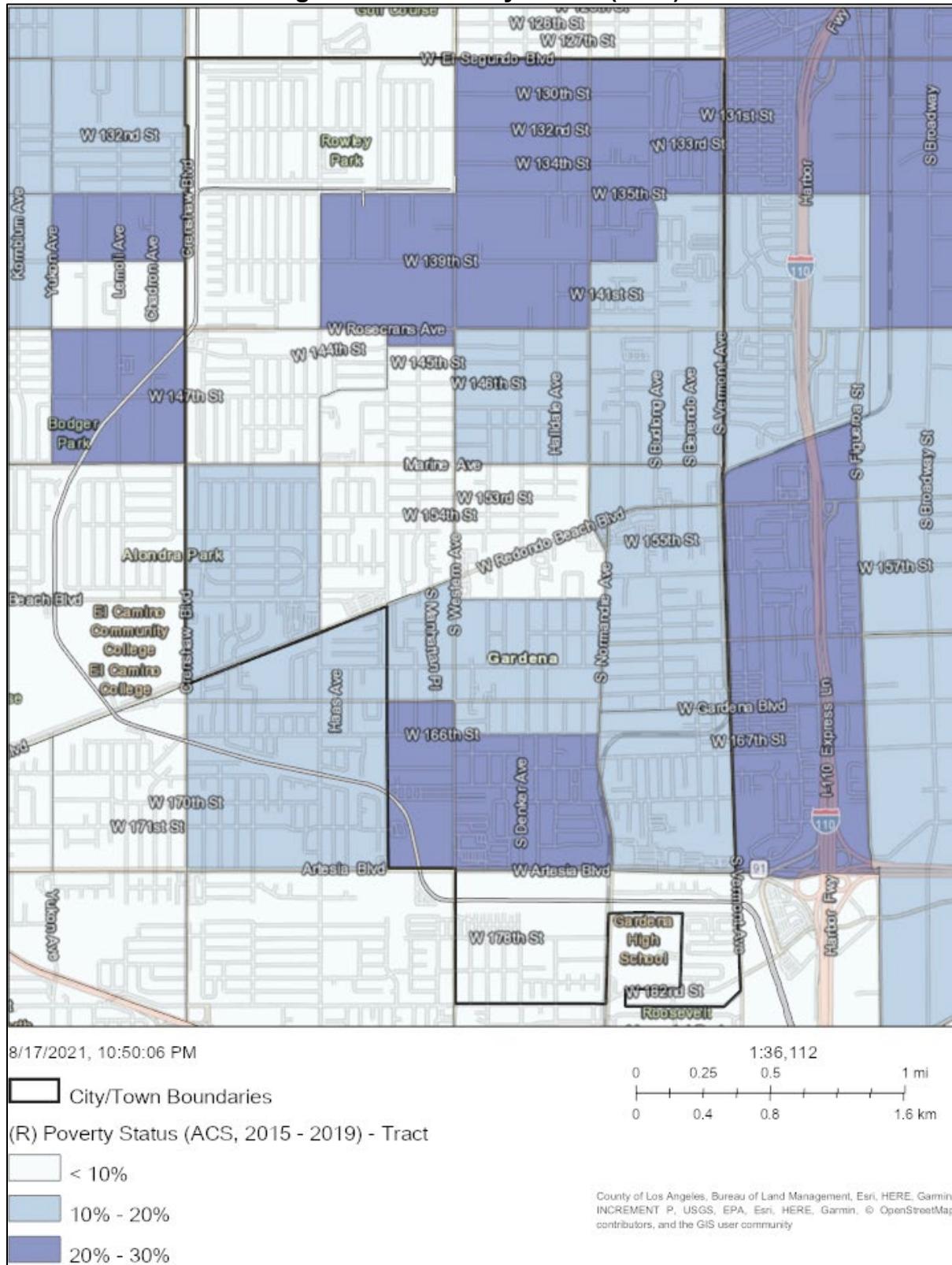
population is under the poverty level: one located in the northeastern corner of the City and one in the southern section north of W. Artesia Boulevard.

Figure E-15: Regional R/ECAPs (2020), TCAC Areas of High Segregation and Poverty (2021), and Poverty Status (2019)



Source: HCD AFFH Data Viewer, HUD R/ECAP data (2009-2013 ACS) TCAC Opportunity Maps (2021) and 2015-2019 ACS, 2021.

Figure E-16: Poverty Status (2019)



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Racially and Ethnically Concentrated Areas of Affluence (RCAAs)

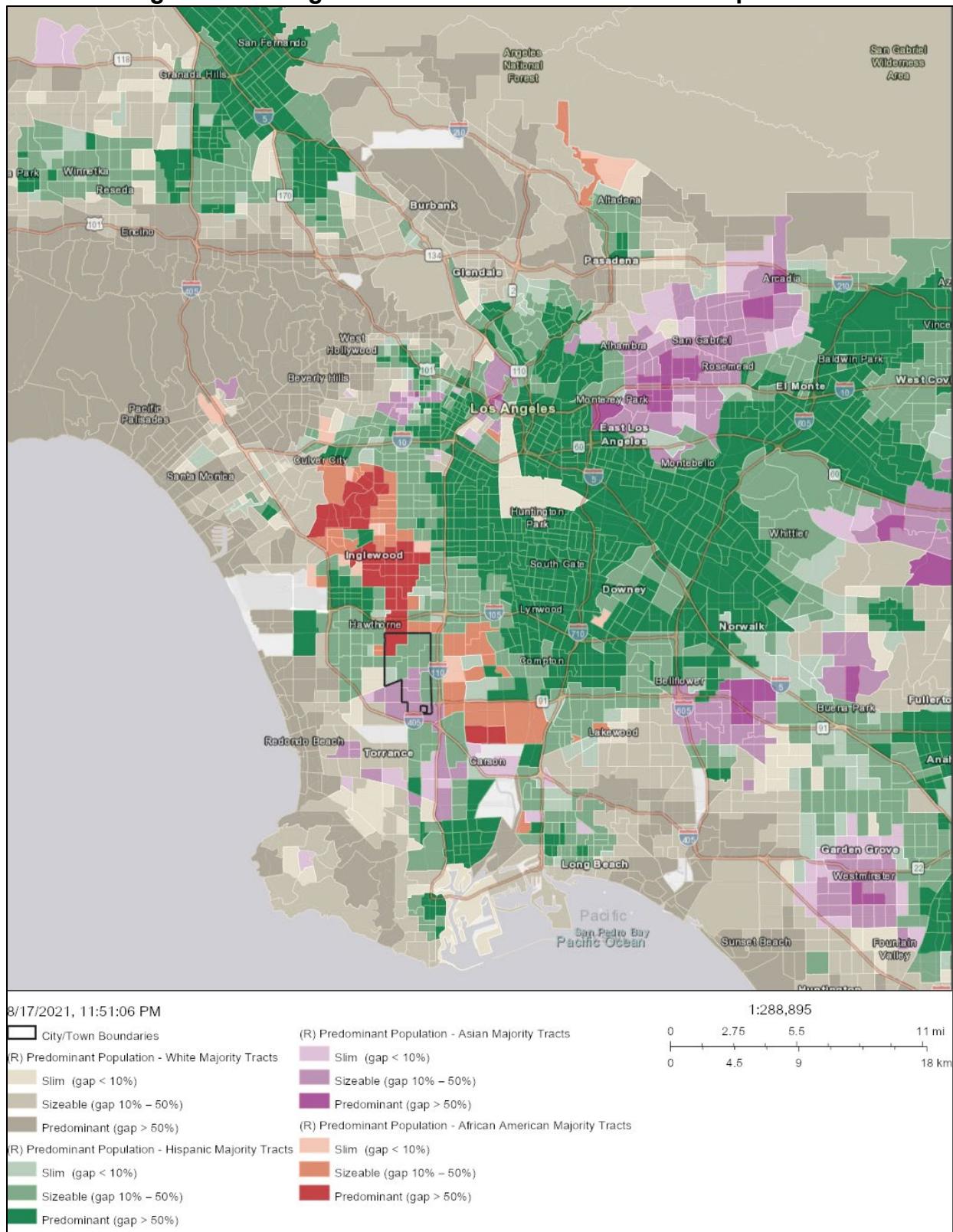
While racially concentrated areas of poverty and segregation (R/ECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. A HUD Policy Paper defines racially concentrated areas of affluence as affluent, White communities.² According to this report, Whites are the most racially segregated group in the United States and “in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.” Based on their research, HCD defines RCAAs as census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater (slightly more than double the national median household income in 2016).

Regional Trend. Figure E-17 shows the predominant racial/ethnic group by tract and Figure E-18 shows median income by block group in the Los Angeles County region. White predominant populations are generally located outside the central Los Angeles County area. The costal South Bay cities, Westside cities, and parts of the San Fernando Valley are predominantly White. The central Los Angeles, San Gabriel Valley, and Gateway cities have Hispanic, African American, or Asian majority populations. The southern Gardena tracts have Asian majorities, northern and central tracts have Hispanic majorities, and the northwestern tract has an African American majority. The central Los Angeles areas are composed of mostly block groups with median incomes below the 2020 State median of \$87,100. Block groups with median incomes exceeding \$125,000 are more concentrated in coastal communities and the areas around Santa Monica and Beverly Hills, and Burbank and Pasadena.

Local Trend. As shown in Figure E-19, there are no block groups in Gardena with the racial/ethnic minority populations smaller than 60%. There is only one block group with a median income exceeding \$125,000 in the northeastern corner of the City. Most the block groups in Gardena have median incomes lower than the State median of \$87,100. There are no areas in Gardena that are considered RCAAs.

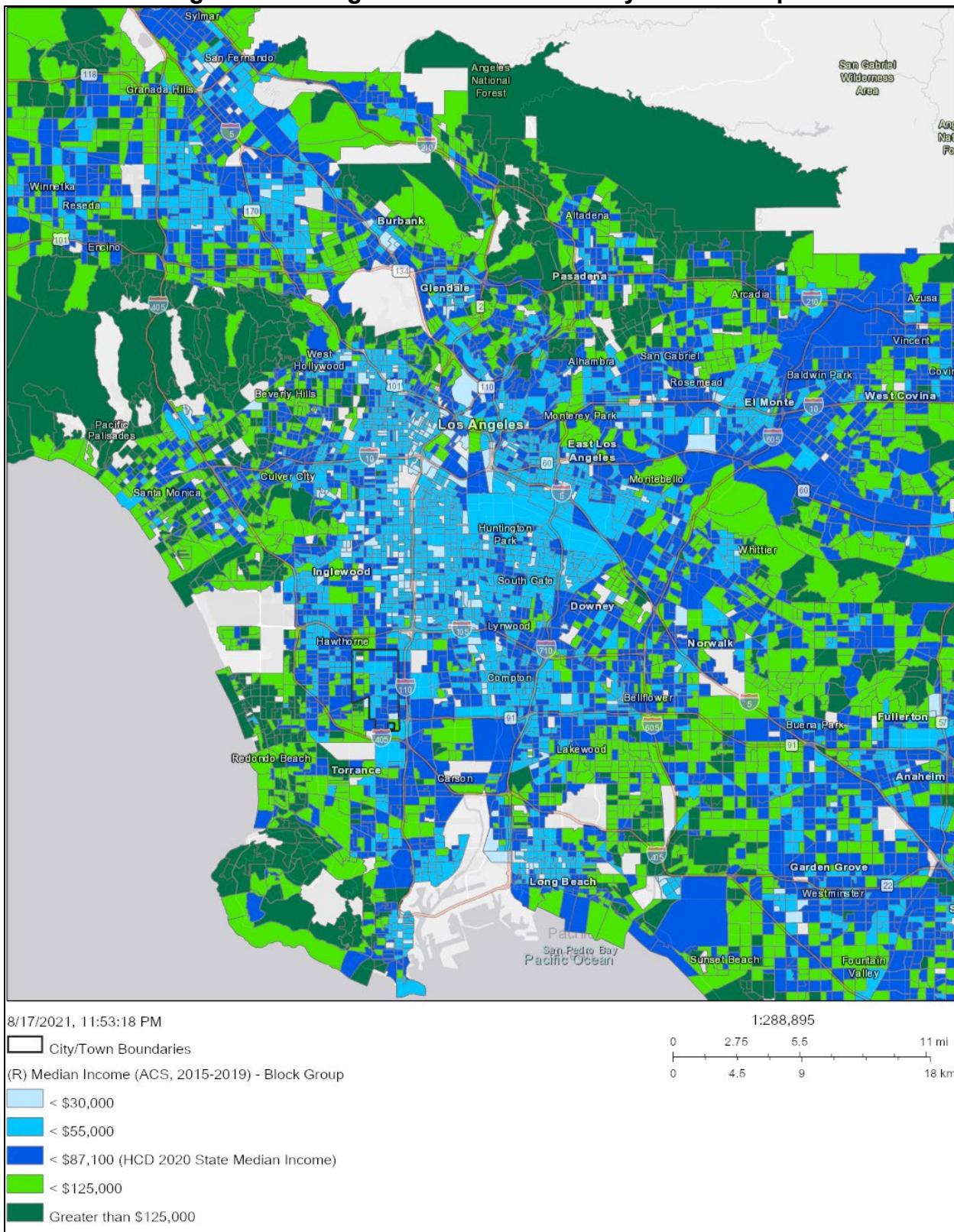
² Goetz, Edward G., Damiano, A., & Williams, R. A. (2019) Racially Concentrated Areas of Affluence: A Preliminary Investigation.' Published by the Office of Policy Development and Research (PD&R) of the U.S. Department of Housing and Urban Development in Cityscape: A Journal of Policy Development and Research (21,1, 99-124).

Figure E-17: Regional Predominant Racial/Ethnic Population



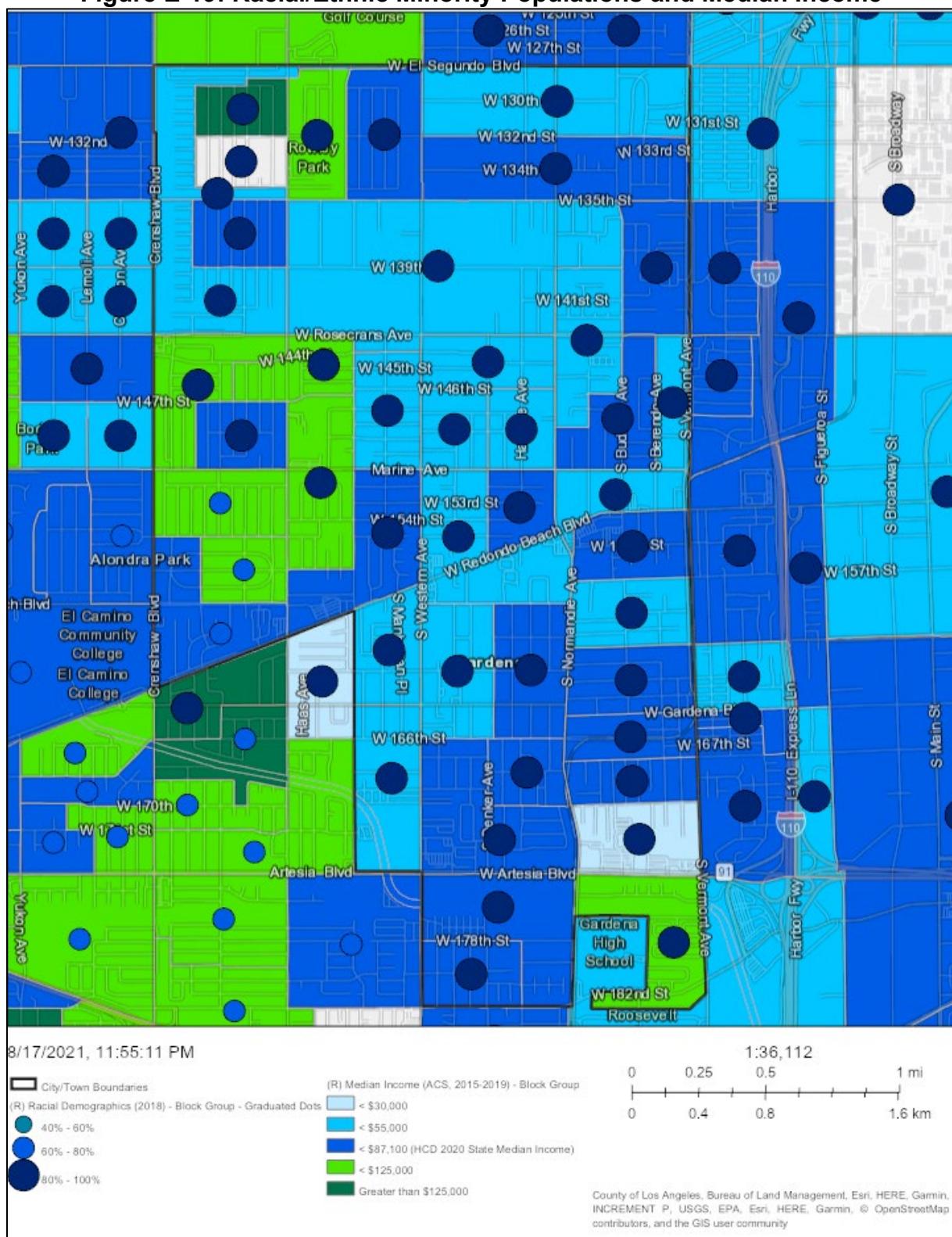
Source: HCD AFFH Data Viewer, 2021.

Figure E-18: Regional Median Income by Block Group



Source: HCD AFFH Data Viewer, 2015-2019 ACS, 2021.

Figure E-19: Racial/Ethnic Minority Populations and Median Income



Source: HCD AFFH Data Viewer, 2021.

Summary of Fair Housing Issues

Nearly 14 percent of the Gardena population is below the poverty level. There are no R/ECAPs or TCAC designated areas of high segregation and poverty in Gardena. Less than 20 percent of the population in most Gardena tracts is under the poverty level. The northeastern tract with a population of 20 percent to 30 percent below the poverty level also has more children living in female-headed households (see Figure E-12). There are no RCAs in Gardena. All block groups have racial/ethnic minority populations of 60 percent or more and most have median incomes below the State average.

Access to Opportunity

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity based on race/ethnicity and poverty status. Index scores are based on the following opportunity indicator indices (values range from 0 to 100):

- **Low Poverty Index:** The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The higher the score, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index:** The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** The higher the trips transit index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The higher the index value, the better access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index:** The higher the value, the better environmental quality of a neighborhood.

To assist in this analysis, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened in the California Fair Housing Task Force (Task Force) to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators related to economic, environmental and educational opportunities and poverty and racial segregation. Based

on these domain scores, tracts are categorized as Highest Resource, High Resource, Moderate Resource, Moderate Resource (Rapidly Changing), Low Resource, or areas of High Segregation and Poverty. Table E-12 shows the full list of indicators.

Table E-12: Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates
Poverty and Racial Segregation	Poverty: tracts with at least 30% of population under federal poverty line Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County
Source: California Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020.	

Regional Trend. HUD Opportunity Indicator scores for Los Angeles County are shown in Table E-13. The White population, including the population below the federal poverty line, received the highest scores in low poverty, school proficiency, labor market participation, jobs proximity, and environmental health. Hispanic communities scored the lowest in low poverty and labor market participation and Black communities scored the lowest in school proficiency, jobs proximity, and environmental health. Black residents were most likely to use public transit and have the lowest transportation costs.

Table E-13: Los Angeles County HUD Opportunity Indicators by Race/Ethnicity

	Low Poverty	School Prof.	Labor Market	Transit	Low Transp. Cost	Jobs Proximity	Env. Health
Total Population							
White, non-Hispanic	62.59	65.09	65.41	82.63	74.09	55.80	18.99
Black, non-Hispanic	34.95	32.37	34.00	87.70	79.18	40.13	11.66
Hispanic	33.91	38.38	33.18	87.19	77.74	41.53	11.91
Asian or Pacific Islander, non-Hispanic	53.57	59.34	55.94	86.52	76.45	51.82	12.16
Native American, non-Hispanic	45.04	46.90	44.50	83.17	75.65	44.24	16.74
Population below federal poverty line							
White, non-Hispanic	50.68	58.06	57.49	86.42	79.48	57.52	16.66
Black, non-Hispanic	23.45	27.16	25.52	88.65	81.18	36.59	11.62
Hispanic	23.66	32.87	27.66	89.45	81.02	42.84	10.30
Asian or Pacific Islander, non-Hispanic	42.97	54.52	50.06	89.62	81.49	54.19	9.84
Native American, non-Hispanic	29.85	35.12	32.02	85.23	78.70	46.35	16.01
Source: HUD AFFH Database – Opportunity Indicators, 2020							

The central Los Angeles County areas around the City of Los Angeles are comprised of mostly low and moderate resource tracts and areas of high segregation and poverty. The El Monte/Baldwin Park area and San Fernando area, including Van Nuys/North Hollywood, also have concentrations of low resource areas and some areas of high segregation and poverty. High and highest resource areas are most concentrated in coastal communities from Rolling Hills/Rancho Palos Verdes to Santa Monica, and areas in and around Beverly Hills, La Cañada Flintridge, and Pasadena/Arcadia.

Local Trend. According to HUD Opportunity Indicators presented in Table E-14, in Gardena, Hispanic residents are mostly likely to be impacted by poverty and have poorer access to employment opportunities. Black Gardena residents are most likely to be exposed to lower school proficiency and labor market participation. White residents were least likely to be exposed to poverty and the most likely to live close to higher quality school systems. Compared to the County, Gardena residents were less likely to be exposed to poverty, more likely to utilize public transit, have lower transportation costs, and be located closer to employment opportunities regardless of race or ethnicity. However, Gardena scored significantly lower in environmental health and school proficiency compared to the County.

Table E-14: Gardena HUD Opportunity Indicators by Race/Ethnicity

	Low Poverty	School Prof.	Labor Market	Transit	Low Transp. Cost	Jobs Proximity	Env. Health
Total Population							
White, non-Hispanic	53.77	31.82	50.89	91.90	82.27	60.52	3.11
Black, non-Hispanic	46.70	12.89	36.95	91.97	82.86	57.88	4.86
Hispanic	42.71	21.98	44.95	91.90	83.75	63.65	3.68
Asian or Pacific Islander, non-Hispanic	48.04	29.74	53.16	92.48	84.46	67.11	2.30
Native American, non-Hispanic	48.71	22.71	44.34	91.19	82.10	59.76	4.07
Population below federal poverty line							
White, non-Hispanic	47.34	32.09	48.26	92.34	83.94	62.21	3.16
Black, non-Hispanic	41.98	10.48	37.63	92.39	83.78	59.19	5.28
Hispanic	35.21	15.51	41.19	91.68	84.91	65.63	4.06
Asian or Pacific Islander, non-Hispanic	46.26	30.04	50.51	92.53	84.68	66.8	1.64
Native American, non-Hispanic	--	--	--	--	--	--	--
-- = data not available.							
Source: HUD AFFH Database – Opportunity Indicators, 2020.							

Opportunity map scores for Gardena census tracts are presented in Figure E-21 along with the City's sites inventory. Of the tracts in Gardena 21.4 percent (3 tracts) are characterized as High Resource, 35.7 percent Moderate Resource (5 tracts), 7.1 percent Moderate Resource (Rapidly Changing) (1 tract), and 35.7 percent Low Resource (5 tracts). Opportunity map categorization and domain scores for Gardena census tracts are shown in Table E-15. There are no tracts in the City that are classified as areas of high segregation and poverty. The northern section of the City is low resource, while the central and southern sections are moderate and high resource areas.

Table E-15: TCAC Opportunity Map Domain Scores for Gardena Tracts

Census Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final Category
6037602600	0.4	0.025	0.234	-0.557	Low Resource
6037602900	0.192	0.096	0.037	-0.749	Low Resource
6037603001	0.41	0.593	0.053	-0.459	Low Resource
6037603004	0.586	0.822	0.175	-0.162	Moderate Resource
6037603005	0.251	0.739	0.132	-0.392	Low Resource
6037603006	0.562	0.894	0.431	0.028	Moderate Resource (Rapidly Changing)
6037603101	0.523	0.849	0.352	-0.07	Moderate Resource
6037603102	0.413	0.206	0.29	-0.326	Low Resource
6037603200	0.779	0.074	0.668	0.129	High Resource
6037603301	0.59	0.772	0.503	0.043	Moderate Resource
6037603302	0.423	0.152	0.746	0.043	Moderate Resource
6037603400	0.563	0.683	0.47	-0.014	Moderate Resource
6037603500	0.647	0.667	0.553	0.092	High Resource
6037603600	0.576	0.803	0.799	0.349	High Resource

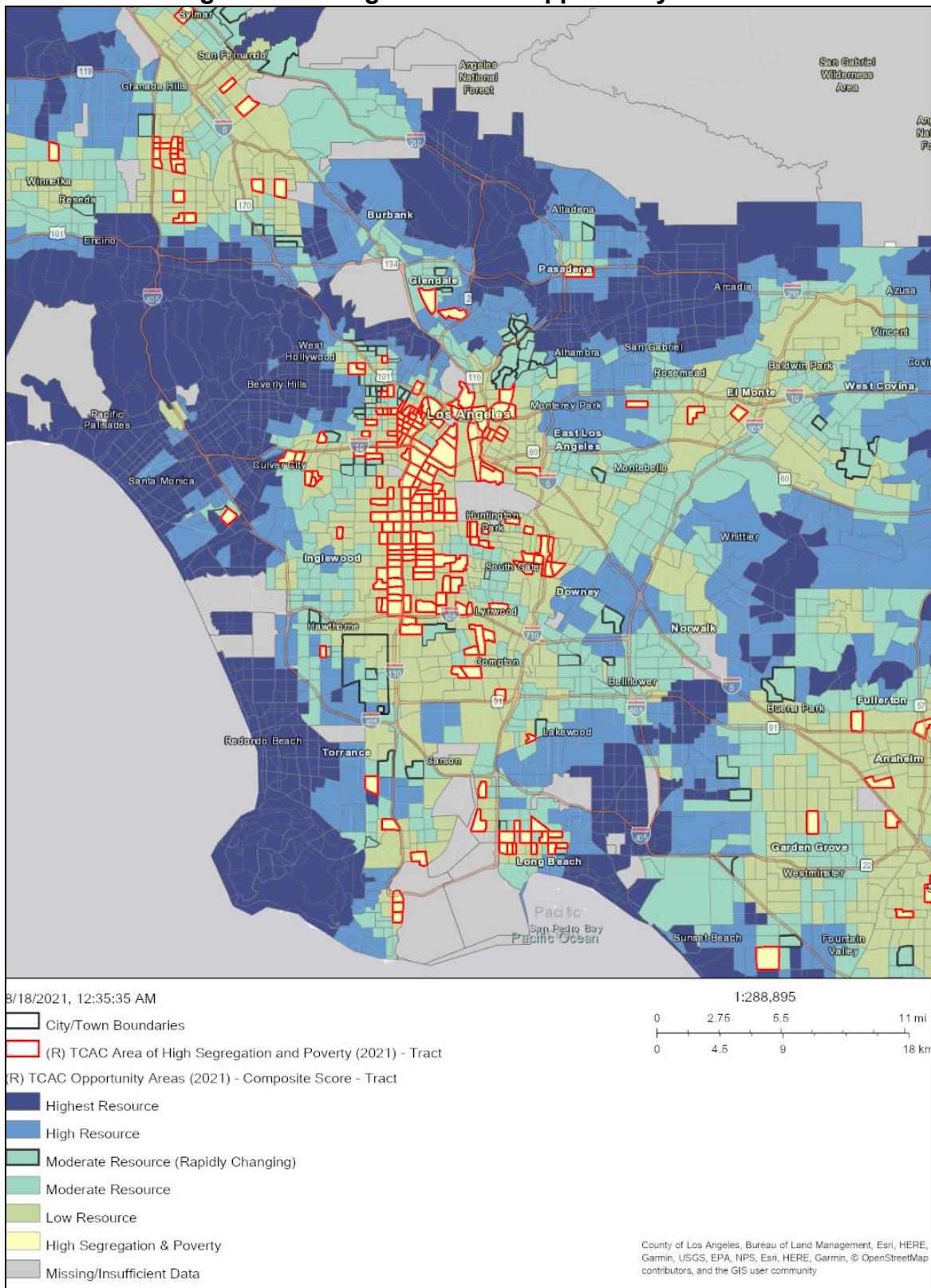
Source: California Fair Housing Task Force, 2021 TCAC/HCD Opportunity Maps, December 2020.

Sites Inventory. Most units used to meet Gardena's 2021-2029 RHNA are in low resource tracts (66.4 percent of units) (Table E-16). Of the 2,636 lower income RHNA units, 10.1 percent are in high resource tracts, 21.1 percent are in moderate resource tracts, including rapidly changing, and 68.9 percent are in low resource tracts. In comparison, 69 percent of moderate income units and 61.2 percent of above moderate income units are in low resource tracts. A larger proportion of moderate income units (17.8 percent) and above moderate income units (18.9 percent) are in high resource tracts compared to lower income units.

Table E-16: Distribution of RHNA Units by TCAC Opportunity Map Category

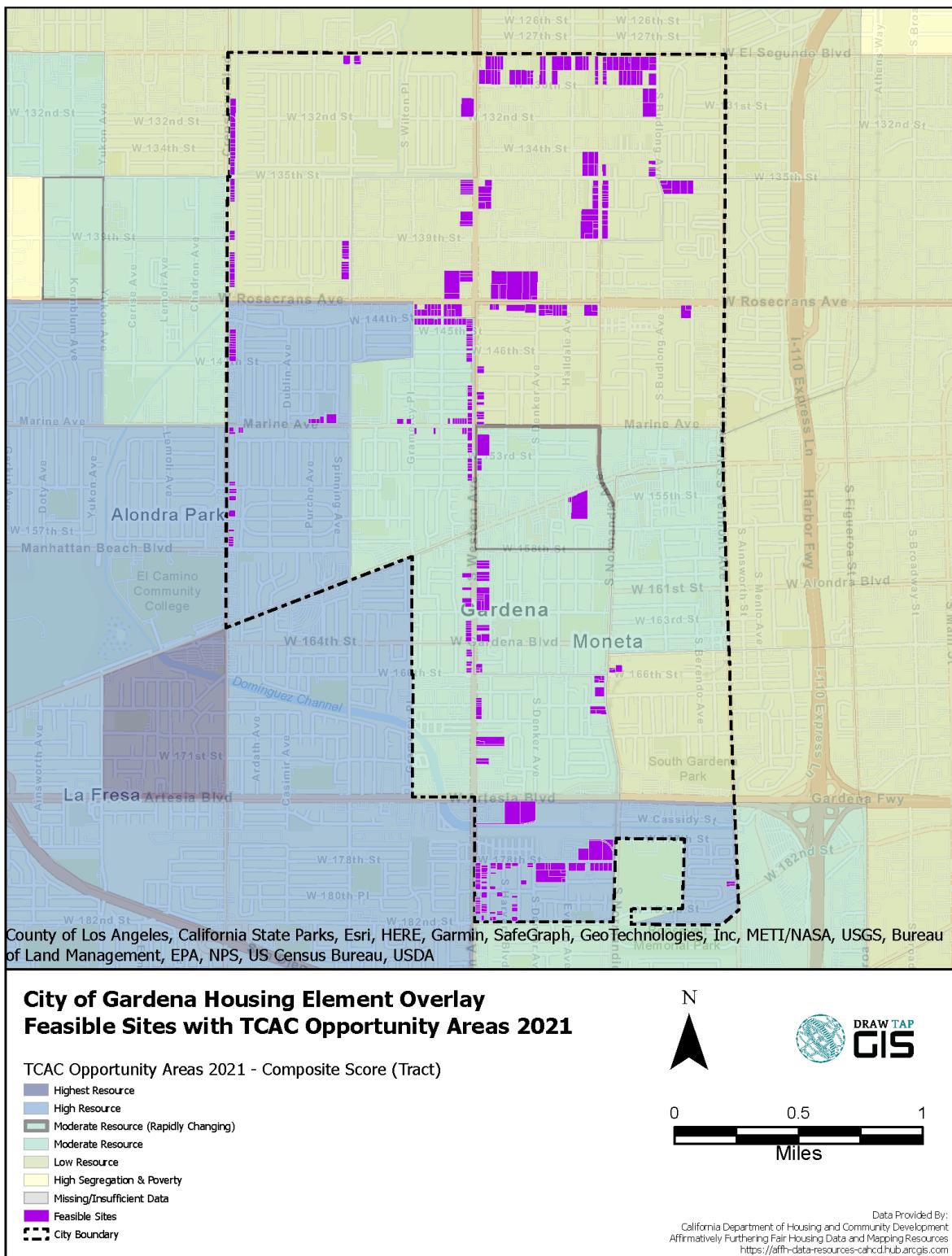
TCAC Opportunity Map Category (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
High Resource	266	10.1%	319	17.8%	406	18.9%	991	15.0%
Moderate Resource	433	16.4%	201	11.2%	344	16.0%	978	14.8%
Moderate Resource (Rapidly Changing)	122	4.6%	37	2.1%	86	4.0%	245	3.7%
Low Resource	1,815	68.9%	1,240	69.0%	1,317	61.2%	4,372	66.4%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

Figure E-20: Regional TCAC Opportunity Areas



Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

Figure E-21: TCAC Opportunity Areas by Tract and Sites Inventory



Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

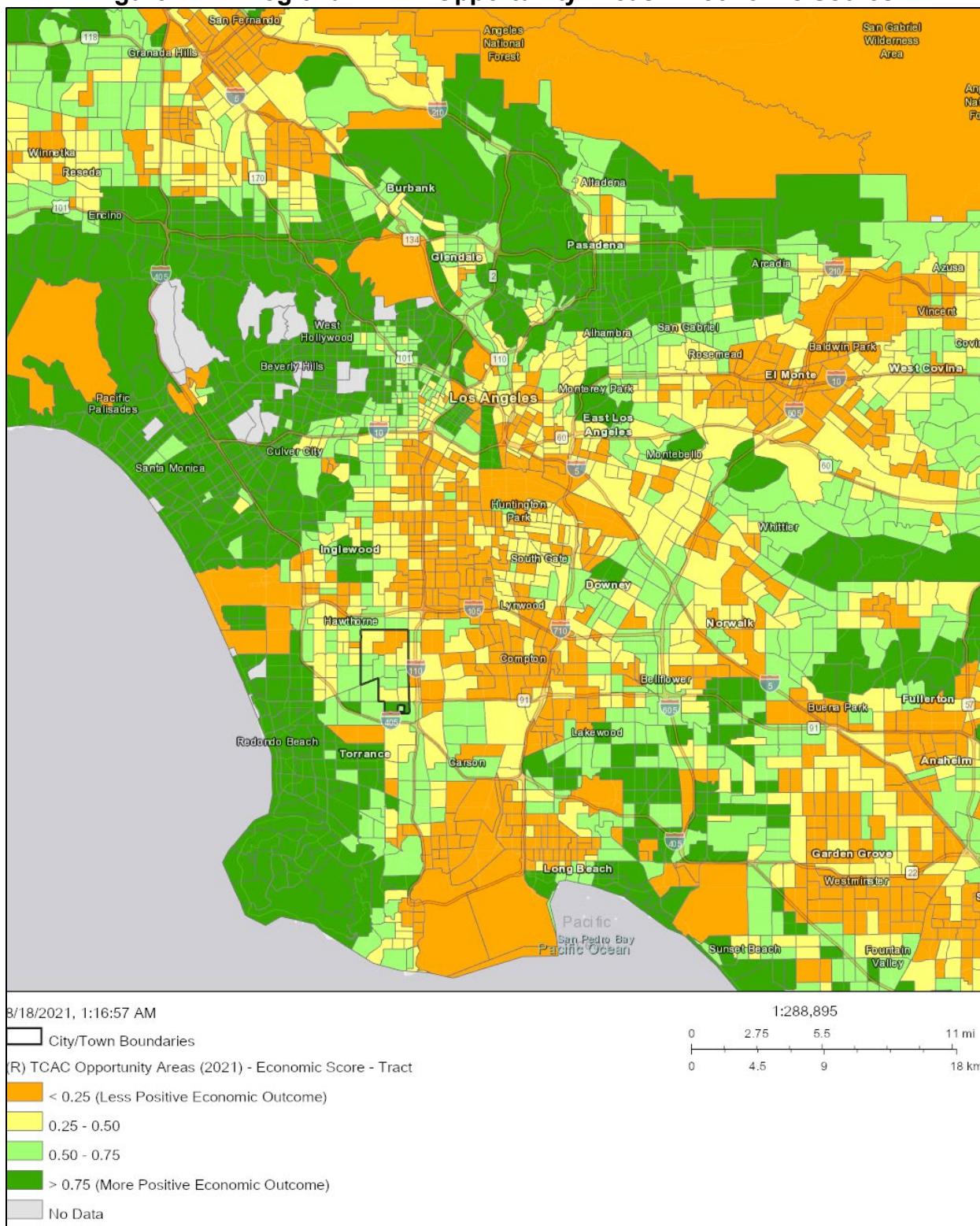
Economic

As described previously, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. See Table E-12 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend. Figure E-22 shows TCAC Opportunity Map economic scores in the Los Angeles region by tract. Consistent with final TCAC categories, tracts with the highest economic scores are concentrated in coastal communities, from the Rancho Palos Verdes to Santa Monica, and areas around Beverly Hills, Burbank, Pasadena, and Arcadia. Tracts with economic scores in the lowest quartile are concentrated in the central Los Angeles County areas, San Gabriel Valley cities around El Monte, and around the cities of Long Beach and Carson.

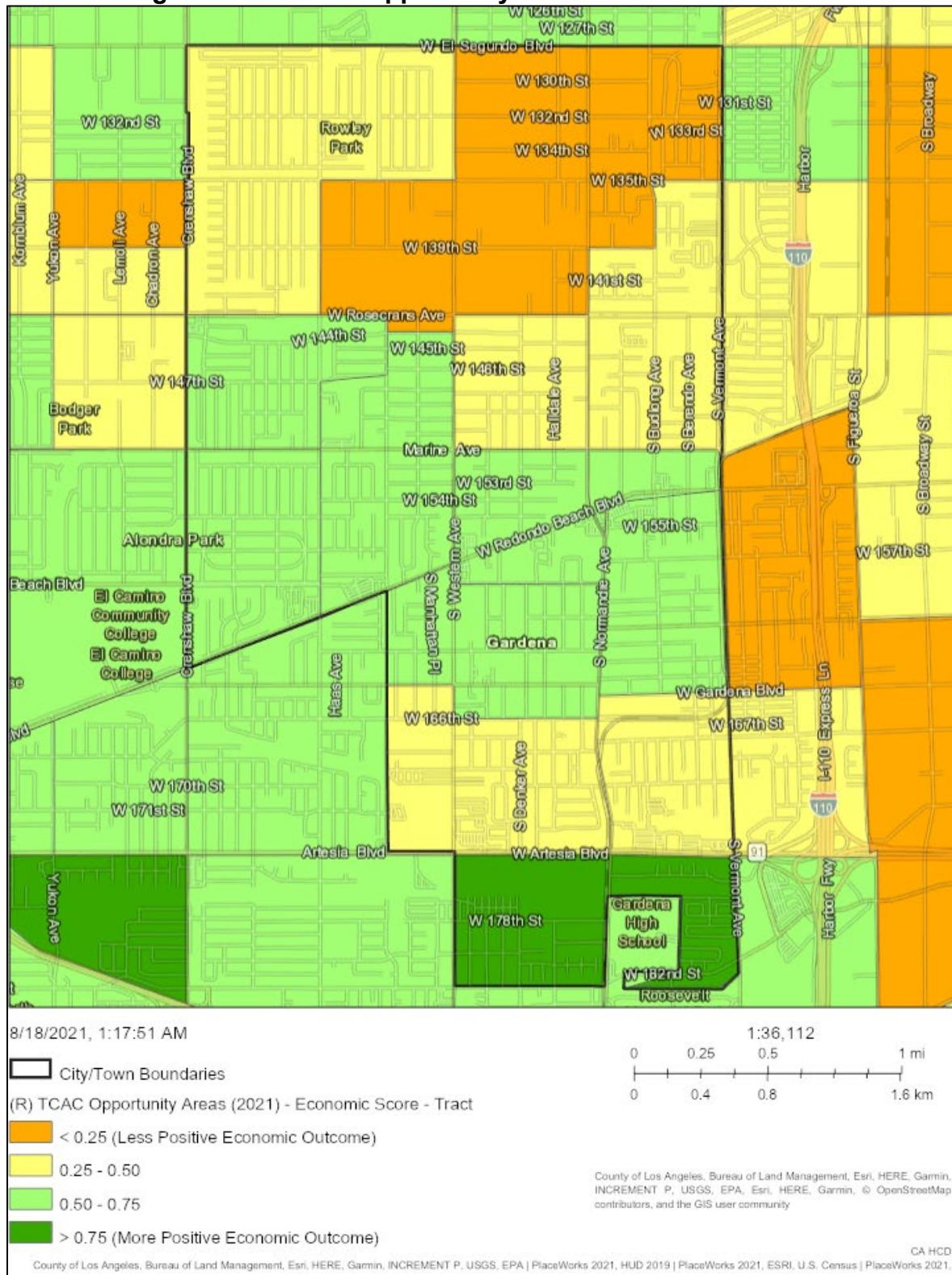
Local Trend. According to the 2021 Opportunity Map presented in Figure E-23, there is one tract in the City with an especially low economic score located in the northeastern section of the City. This tract is categorized as a low resource area and has concentrations of racial/ethnic minorities, children in female-headed households, and LMI households (see Figure E-5, Figure E-12, and Figure E-14). The tract located along the southern border received the highest economic score. The rest of Gardena received an economic score between 0.25 and 0.75.

Figure E-22: Regional TCAC Opportunity Areas – Economic Scores



Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

Figure E-23: TCAC Opportunity Areas – Economic Scores



Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

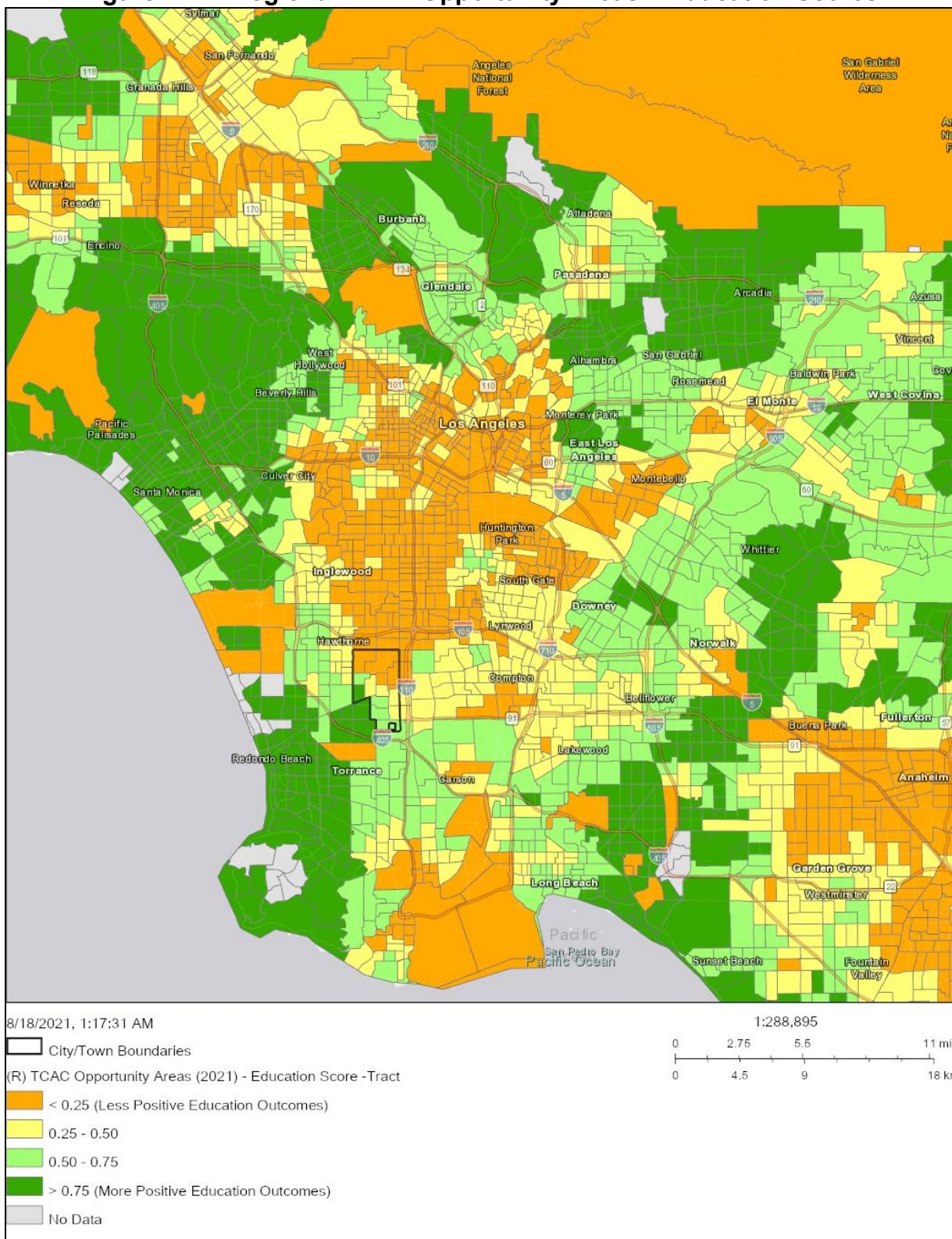
Education

As described above, the Fair Housing Task Force determines education scores based on math and reading proficiency, high school graduation rates, and student poverty rates. See Table E-12 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend. TCAC Opportunity Map education scores for the region are shown in Figure E-24. The central County areas have the highest concentration of tracts with education scores in the lowest percentile. There is also a concentration of tracts with low education scores in San Fernando Valley cities east of Burbank. Areas around coastal communities, Burbank/La Cañada Flintridge, Arcadia, and Whittier have the highest education scores.

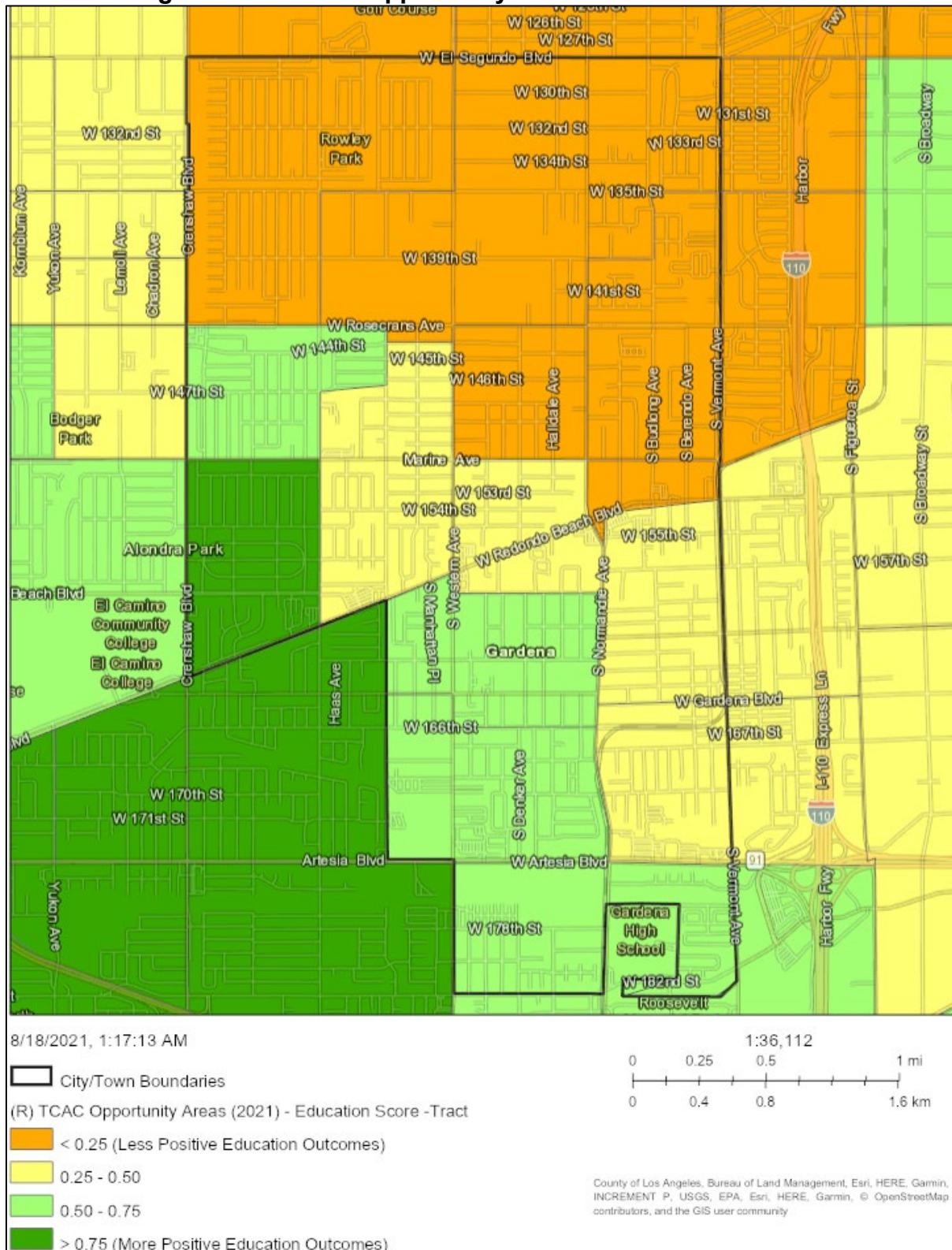
Local Trend. Areas with lower education scores, shown in Figure E-25, are concentrated in the northern section of the City. The southern end of the City tends to have higher education scores and one tract along the western border received an education score in the highest percentile. The areas with lower education scores also received lower economic scores and are categorized as low resource (see Figure E-21 and Figure E-23).

Figure E-24: Regional TCAC Opportunity Areas – Education Scores



Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

Figure E-25: TCAC Opportunity Areas – Education Scores



Environmental

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 3.0 pollution indicators and values. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to considering (1) environmental factors such as pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure and (2) sensitive receptors, including seniors, children, persons with asthma, and low birth weight infants, CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. See Table E-12 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend. A larger proportion of Los Angeles County has environmental scores in the lowest percentile compared to economic and education scores (Figure E-26). The central Los Angeles County, San Gabriel Valley, South Bay, and San Fernando Valley areas near Burbank all have concentrations of tracts with environmental scores in the lowest percentile. Tracts with the highest environmental scores are in western South Bay areas (i.e., Rolling Hills and Redondo Beach), and areas around Inglewood, Altadena, Whittier, and Lakewood.

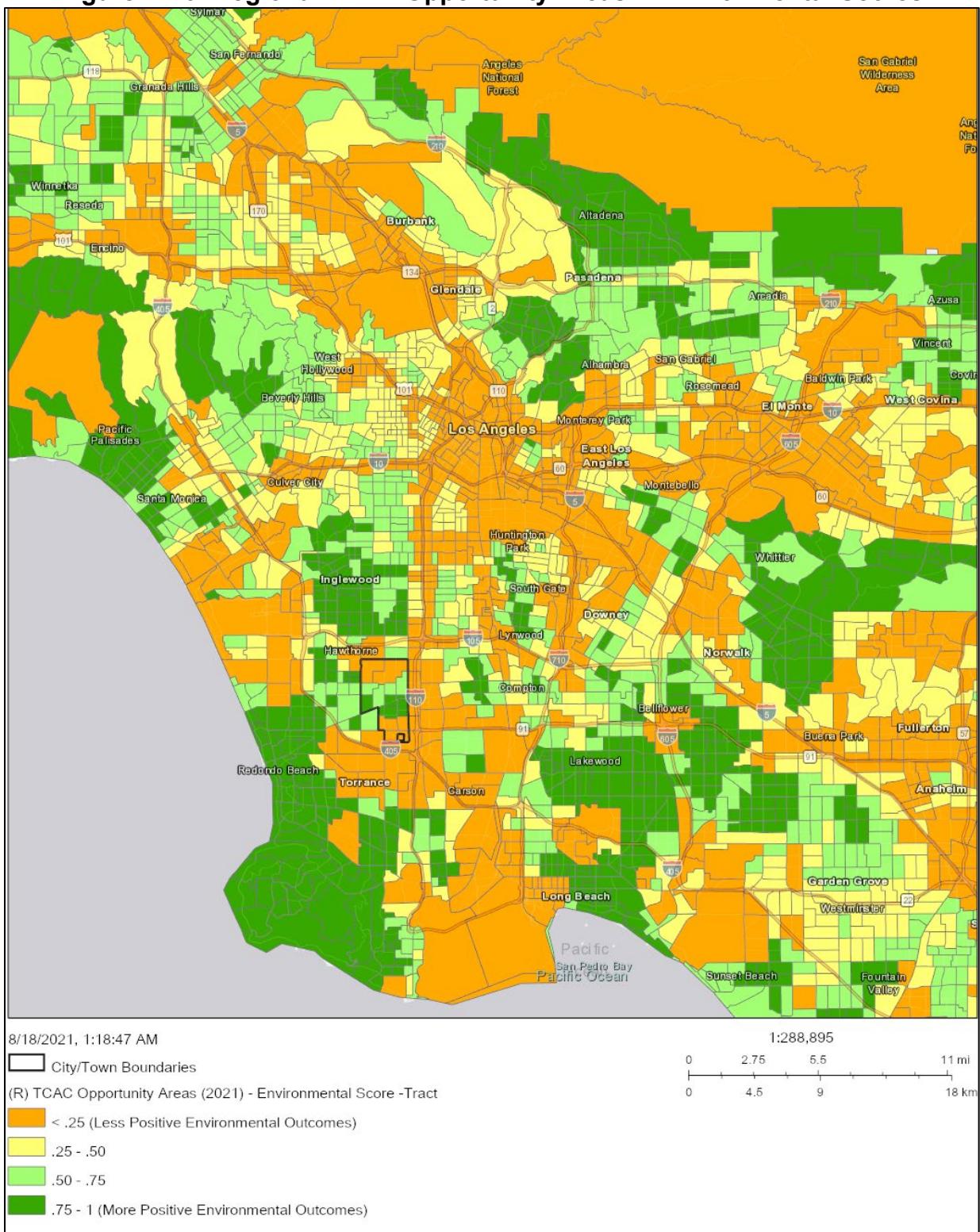
Local Trend. Figure E-27 shows that the northern and southern areas of the City have the lowest environmental scores. The central area of the City received higher environmental scores of 0.50 and above. As discussed previously, the northern area of the City received low economic and education scores and is categorized as a low resource area (see Figure E-21, Figure E-23, and Figure E-25).

Sites Inventory. The February 2021 update to the CalEnviroScreen (CalEnviroScreen 4.0) and the City's sites inventory is shown in Figure E-28. A census tract's overall CalEnviroScreen percentile equals the percentage of all ordered CalEnviroScreen scores that fall below the score for that area. The areas with the highest (worst) scores are in the central and southern areas of the City. The central part of the City scored slightly better than the northern and southern ends of the City, but all Gardena tracts scored in the 50th percentile or above relative to other census tracts. The distribution of RHNA units by CalEnviroScreen 4.0 score is presented in Table E-17. Over half of all RHNA units are in tracts that fall within the highest (worst) percentile score, including 55.1 percent of lower income units, 62.8 percent of moderate income units, and 47.3 percent of above moderate income units.

Table E-17: Distribution of RHNA Units by CalEnviroScreen 4.0 Percentile

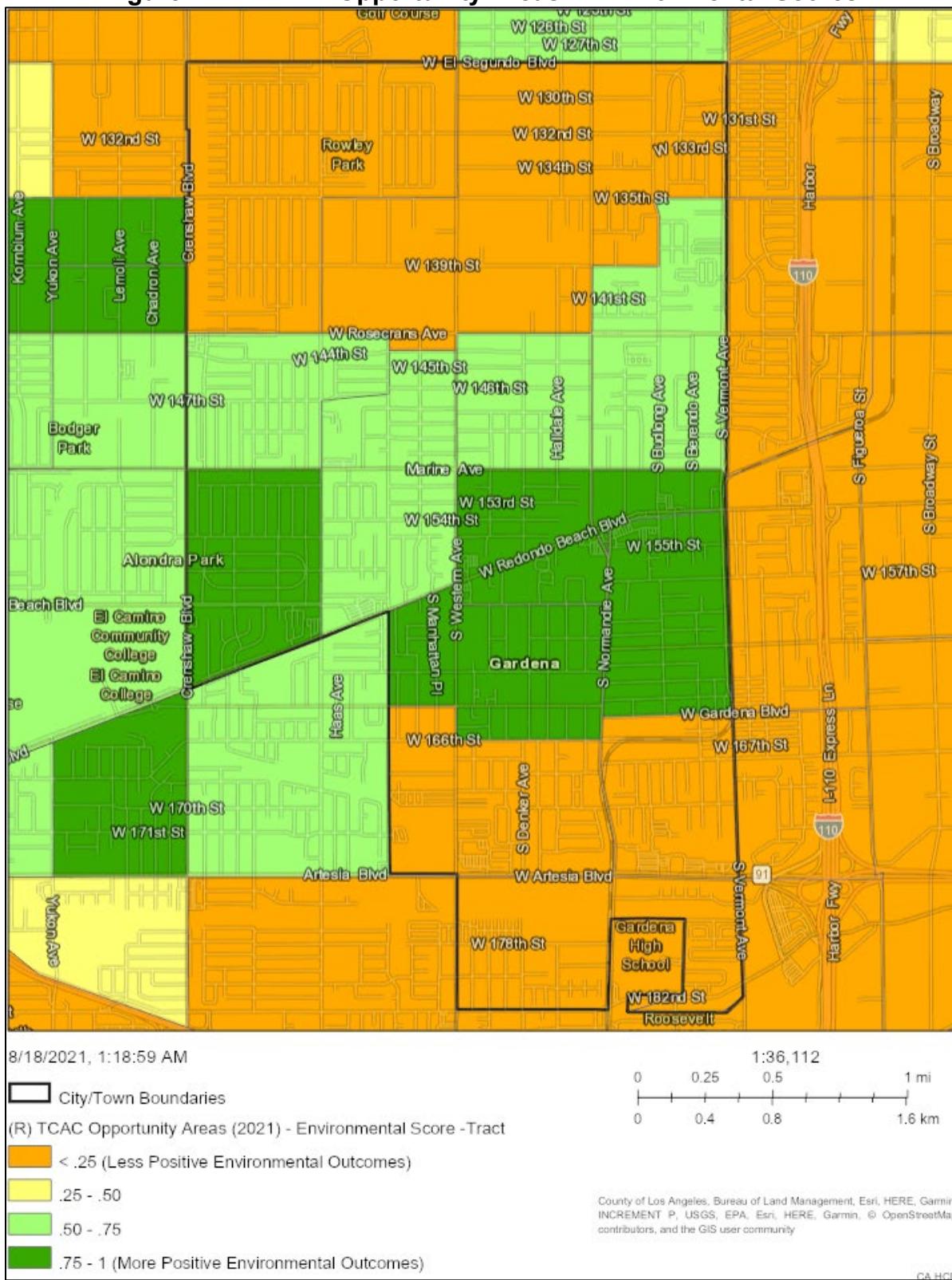
CalEnviroScreen 4.0 Percentile Score (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
61-70%	122	4.6%	95	5.3%	92	4.3%	309	4.7%
71-80%	344	13.1%	105	5.8%	281	13.1%	730	11.1%
81-90%	718	27.2%	469	26.1%	762	35.4%	1,949	29.6%
91-100%	1,452	55.1%	1,128	62.8%	1,018	47.3%	3,598	54.6%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

Figure E-26: Regional TCAC Opportunity Areas – Environmental Scores



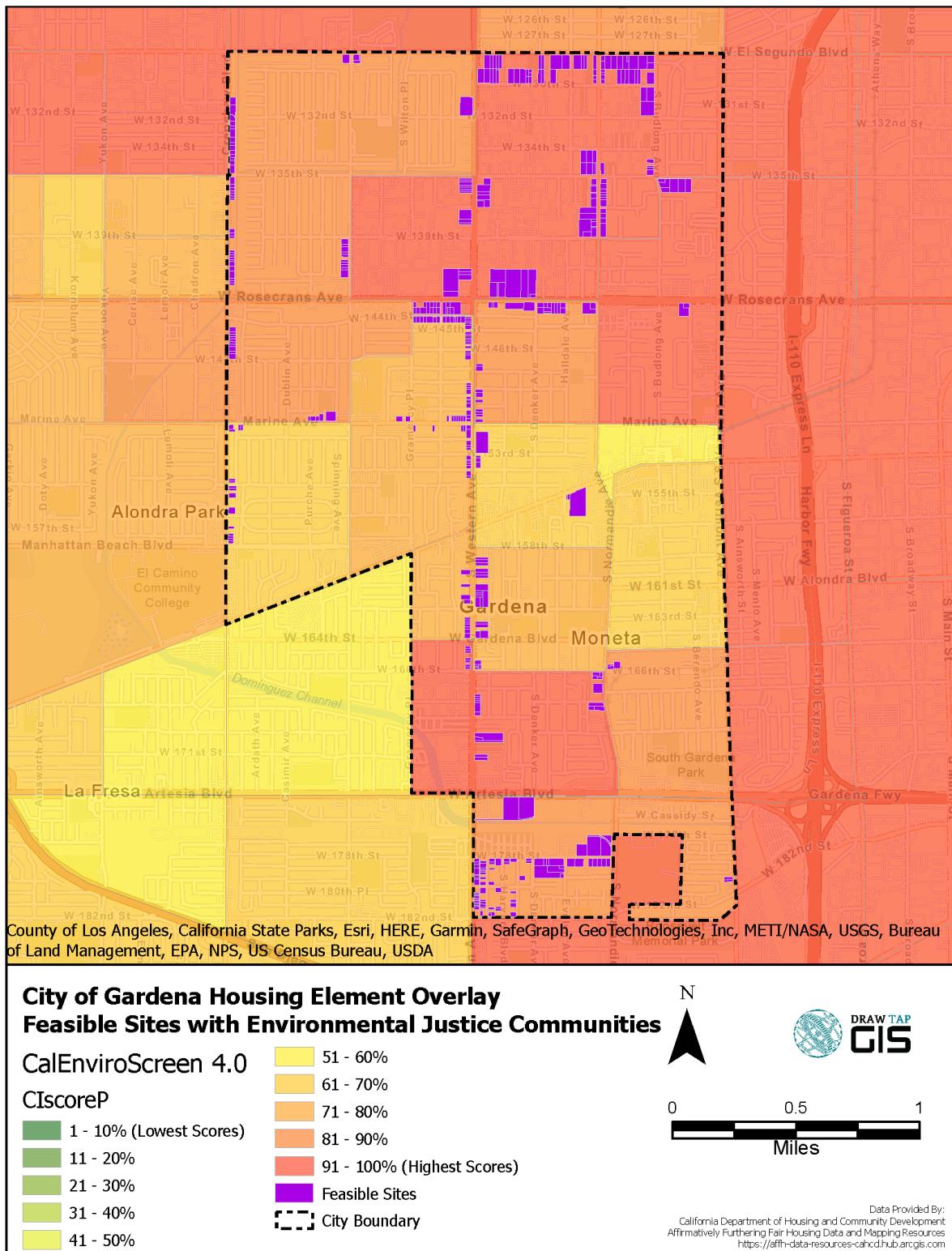
Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

Figure E-27: TCAC Opportunity Areas – Environmental Scores



Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

Figure E-28: CalEnviroScreen 4.0 Scores and Sites Inventory



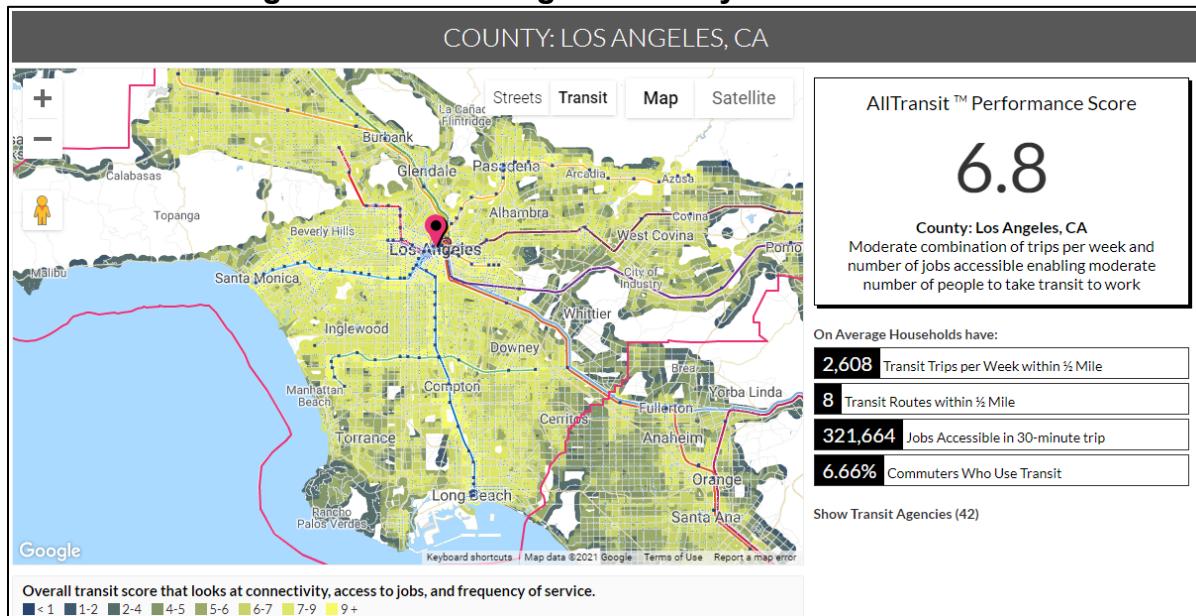
Source: HCD AFFH Data Viewer, TCAC Opportunity Maps, 2021.

Transportation

HUD's Job Proximity Index, shown in Table E-13 and Table E-14 above, can be used to show transportation need geographically. Block groups with lower jobs proximity indices are located further from employment opportunities and have a higher need for transportation. Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities. SCAG developed a mapping tool for High Quality Transit Areas (HFTA) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HTAs as areas within one-half mile from a major transit stop and a high-quality transit corridor. This section also utilizes All Transit metrics to identify transportation opportunities in Los Angeles County and Gardena.

Regional Trend. All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service.³ Gardena's All Transit Performance score of 4.7 is lower than the surrounding jurisdictions of Carson (6.0), Hawthorne (7.3), Inglewood (7.7), Lawndale (7.8), Torrance (6.1), and the County (6.8). Los Angeles County All Transit metrics are shown in Figure E-29. The County's All Transit score of 6.8 indicates a moderate combination of trips per week and number of accessible jobs enabling a moderate number of people to take transit to work. All Transit estimates 93.9 percent of jobs and 90.1 percent of workers are located within ½ a mile from transit.

Figure E-29: Los Angeles County All Transit Metrics



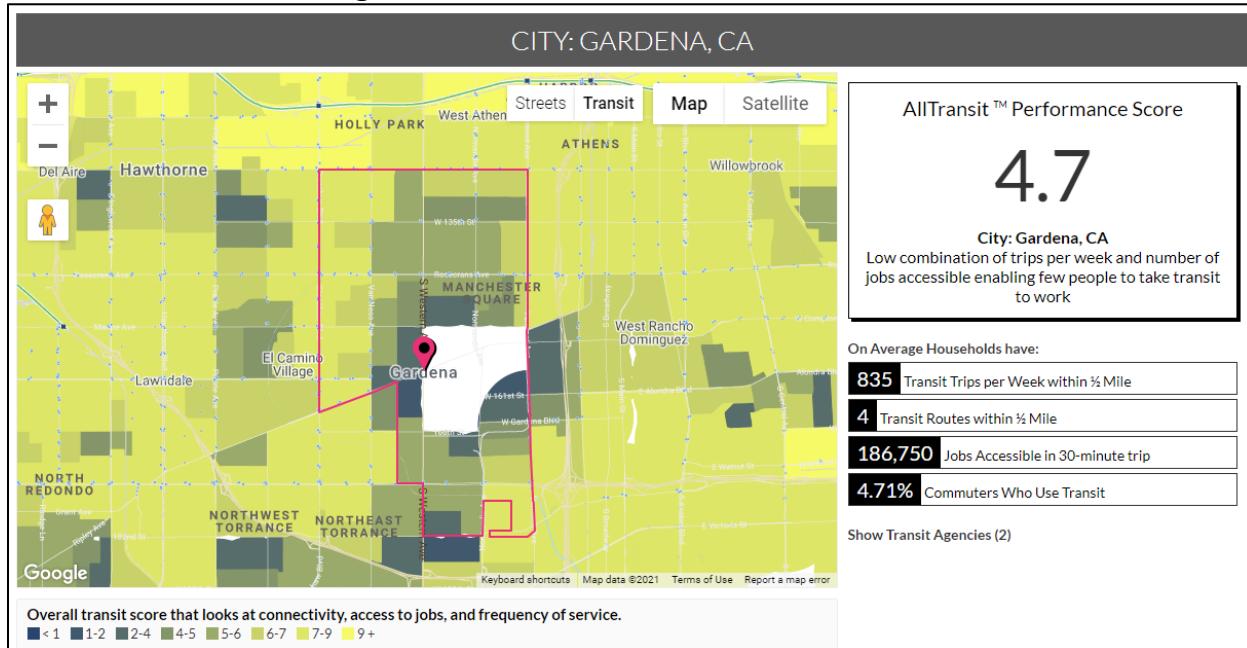
Source: All Transit Metrics: All Transit Performance Score – Los Angeles County, 2019.

³ AllTransit. 2019 Metrics: AllTransit Performance Score. <https://alltransit.cnt.org/>. Accessed August 2021.

As shown in Figure E-31, block groups around Santa Monica/Beverly Hills, Glendale/Burbank, Torrance, downtown Los Angeles, and coastal areas around El Segundo have the highest jobs proximity index scores indicating employment opportunities are most accessible in these areas. Central County areas, from Inglewood to Bellflower, southern South Bay cities, and parts of San Fernando Valley have the lowest jobs proximity index scores. Most of the central County areas and San Fernando Valley are considered HQTAs (Figure E-33).

Local Trend. All Transit metrics for Gardena are shown in Figure E-30. Gardena received an All Transit Performance Score of only 4.7, indicating a low combination of trips per week and number of jobs accessible by transit. All Transit estimates that 77.9 percent of jobs and 85.4 percent of workers in Gardena live within $\frac{1}{2}$ a mile from transit.

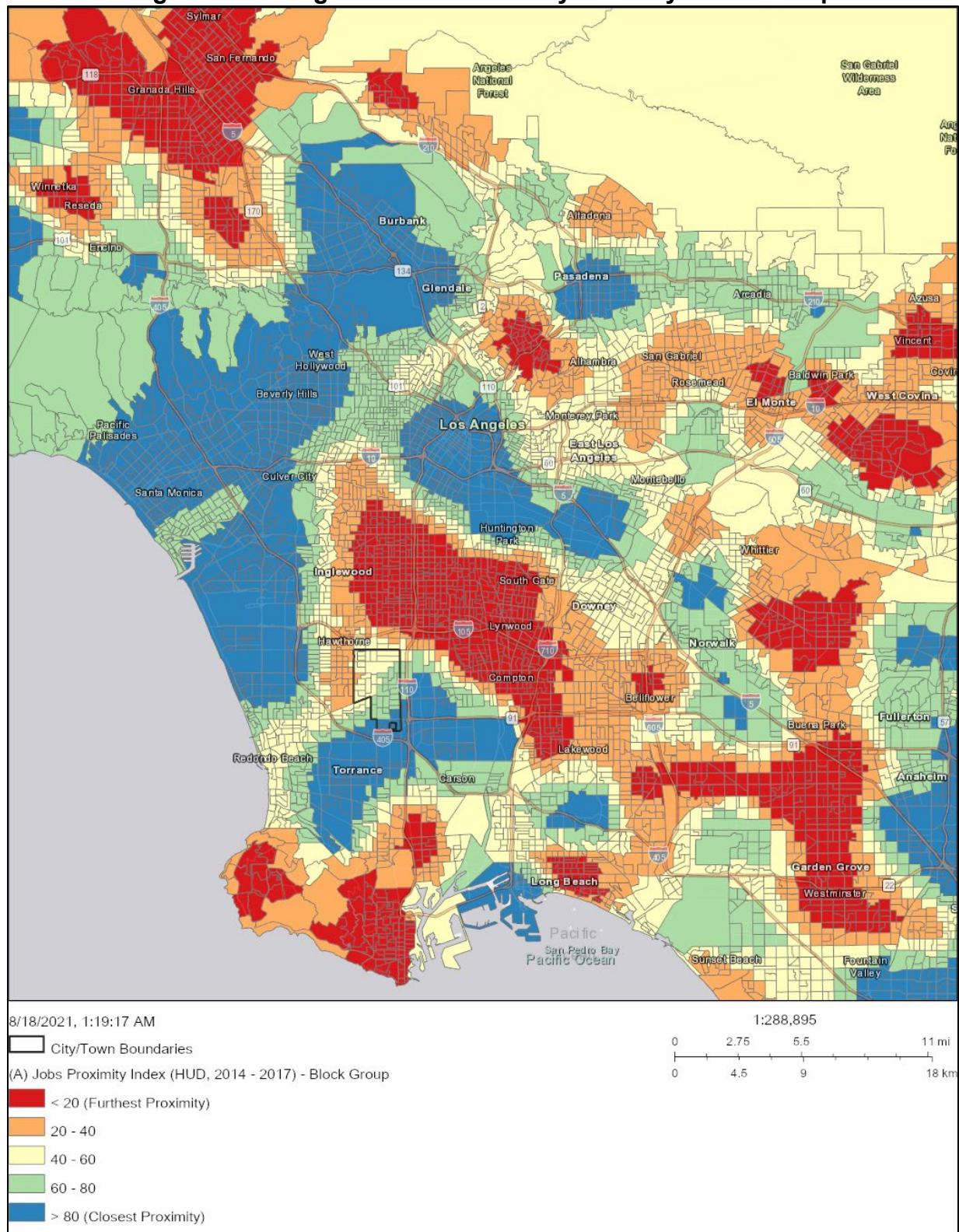
Figure E-30: Gardena All Transit Metrics



Source: All Transit Metrics: All Transit Performance Score – Los Angeles County, 2019.

Based on HUD Opportunity Indicators shown in Table E-14, Gardena residents, regardless of race, have better access to employment opportunities compared to residents Countywide. As shown in Figure E-32, census block groups in the southeastern areas of the City have the greatest access to employment opportunities. Employment opportunities are less accessible to residents in the northwestern areas of Gardena. One block group along the western City border received a jobs proximity score of 39, the lowest in the City. Figure E-33 shows that most of Gardena is considered an HQTA. As discussed previously, Gardena also scored higher than the County average in access to transit and low transportation cost (see Table E-14).

Figure E-31: Regional Jobs Proximity Index by Block Group



Source: HCD AFFH Data Viewer, HUD Opportunity Indicators, 2021.

Figure E-32: Jobs Proximity Index by Block Group

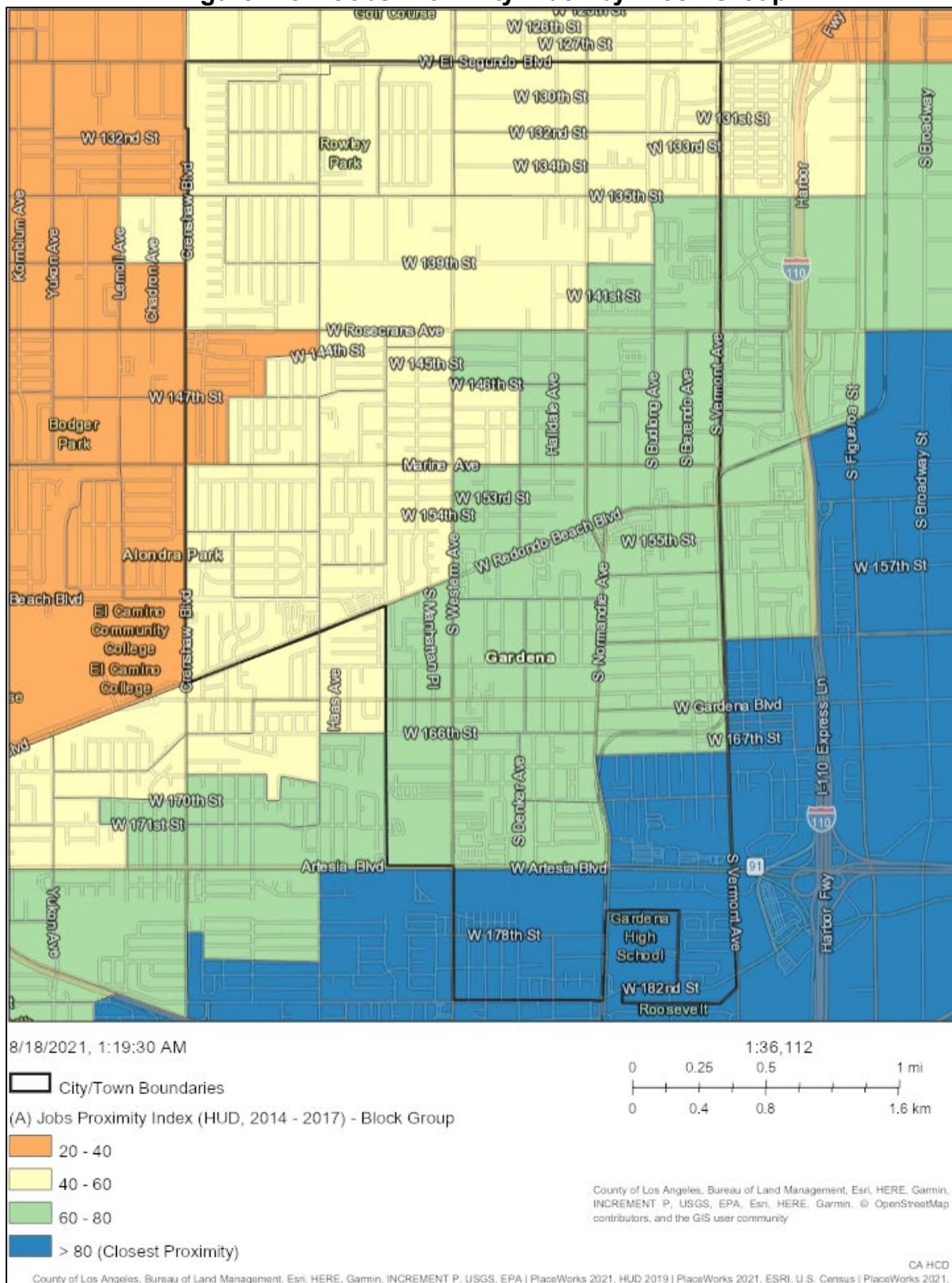
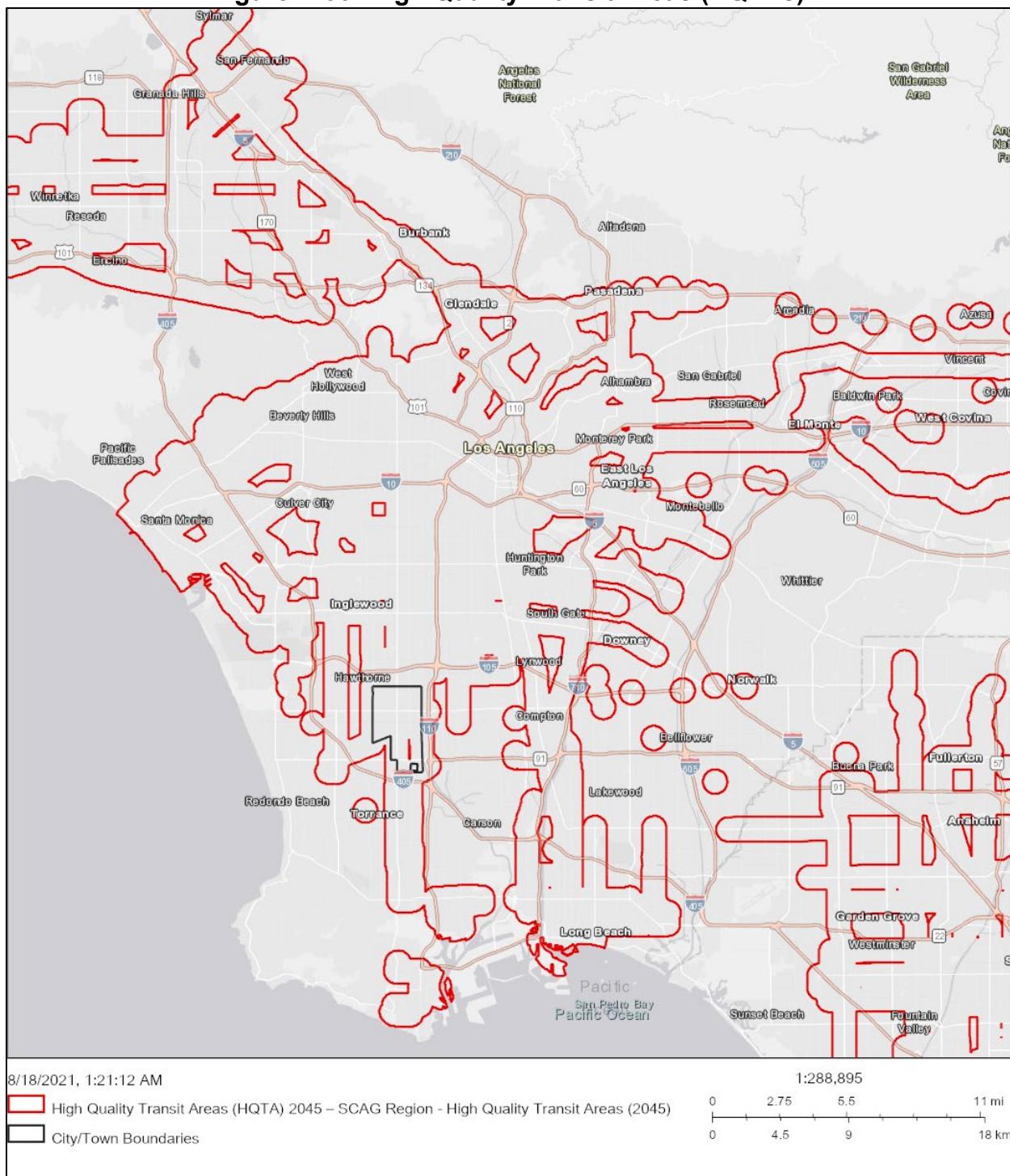


Figure E-33: High Quality Transit Areas (HQTA)



Source: SCAG HTQA database, 2021.

Summary of Fair Housing Issues

As discussed previously, the entire City has high concentrations of racial/ethnic minorities (see Figure E-5). The low resource areas in the northern half of the City also have larger proportions of LMI households and children in female-headed households (see Figure E-12 and Figure E-14). Northern Gardena also has lower economic scores, education scores, and jobs proximity index scores compared to the southern section of the City.

Disproportionate Housing Needs

Housing problems for Gardena were calculated using HUD's 2020 Comprehensive Housing Affordability Strategy (CHAS) data based on the 2013-2017 ACS. Table E-18 breaks down households by race and ethnicity and presence of housing problems for Gardena and Los Angeles County households. The following conditions are considered housing problems:

- Substandard Housing (measured by incomplete plumbing or kitchen facilities)
- Overcrowding (more than 1 person per room)
- Cost burden (housing costs greater than 30 percent)

In Gardena, 41.2 percent of owner-occupied households and 59.3 percent of renter-occupied households have one or more housing problems. The city has a larger proportion of households with a housing problem compared to the County, where 38.9 percent of owner-occupied households and 62.3 percent of renter-occupied households experience a housing problem. In Gardena, Pacific Islander renter-households experience housing problems at the highest rate (97.8 percent). Black and Hispanic households, owners and renters, also experience housing problems at a higher rate than the city average.

Table E-18: Housing Problems by Race/Ethnicity

Race/Ethnicity	Gardena		Los Angeles County	
	Owner	Renter	Owner	Renter
White	32.6%	43.0%	32.1%	52.6%
Black	52.6%	64.1%	41.5%	63.7%
Asian	33.3%	55.5%	38.3%	56.3%
American Indian	8.9%	--	39.7%	56.4%
Pacific Islander	42.9%	97.8%	39.7%	55.5%
Hispanic	46.4%	63.7%	48.2%	71.1%
Other	46.2%	45.3%	36.5%	55.7%
All	41.2%	59.3%	38.9%	62.3%

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

Cost Burden

Households are considered cost burdened if housing costs exceed 30 percent of their gross income for housing, and severely cost burdened if housing costs exceed 50 percent of their gross income. Cost burden in Gardena and Los Angeles County is assessed using 2020 HUD CHAS data (based on 2013-2017 ACS estimates) and the HCD Data Viewer (based on 2010-2014 and 2015-2019 ACS estimates).

Regional Trend. Cost burden by tenure and race/ethnicity for Los Angeles County is shown in Table E-19. Approximately 45 percent of Los Angeles County households are cost burdened, including 35 percent of owner-occupied households and 54.2 percent of renter-occupied households. Non-Hispanic Black and Hispanic renter households have the highest rate of cost burden of 59.6 percent and 58.3 percent, respectively. Non-Hispanic White and non-Hispanic Pacific Islander owner households have the lowest rate of cost burden of 31.1 percent and 33.3 percent, respectively. Cost burden is more common amongst renter households than owner households regardless of race or ethnicity.

Table E-19: Cost Burden by Race/Ethnicity – Los Angeles County

Race/Ethnicity	Cost Burdened (>30%)	Severely Cost Burdened (>50%)	Total Households
Owner-Occupied			
White, non-Hispanic	31.1%	14.8%	648,620
Black, non-Hispanic	40.0%	19.6%	104,895
Asian, non-Hispanic	34.4%	15.8%	255,890
American Indian, non-Hispanic	36.9%	16.3%	3,215
Pacific Islander, non-Hispanic	33.3%	14.8%	2,165
Hispanic	39.5%	17.8%	470,670
Other	34.9%	17.2%	26,905
Renter-Occupied			
White, non-Hispanic	49.4%	27.5%	541,545
Black, non-Hispanic	59.6%	34.8%	206,950
Asian, non-Hispanic	47.6%	25.5%	226,765
American Indian, non-Hispanic	48.8%	26.8%	4,420
Pacific Islander, non-Hispanic	47.9%	22.5%	4,355
Hispanic	58.3%	30.5%	755,590
Other	50.9%	27.5%	43,210

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

Local Trend. Cost burden by tenure based on HUD CHAS data is shown in Table E-20. Pacific Islander and Black renter-occupied households have the highest rate of cost burden in the city (88.9 and 66.4 percent, respectively). American Indian and White owner-occupied households have the lowest instance of cost burden (8.9 and 28.9

percent, respectively). For all racial and ethnic groups besides members of a group not listed (“other”), cost burden is more prevalent amongst renter-occupied households. Overall, 45.5 percent of Gardena households are cost burdened, and 22.9 percent are severely cost burdened. Over half (54.6 percent) of renters in Gardena pay more than 30 percent of their income in housing, compared to 36.2 percent of owners. A larger proportion of households in Gardena are cost burdened compared to the County.

Table E-20: Cost Burden by Race/Ethnicity – Gardena

Race/Ethnicity	Cost Burdened (>30%)	Severely Cost Burdened (>50%)	Total Households
<i>Owner-Occupied</i>			
White, non-Hispanic	28.9%	13.3%	1,765
Black, non-Hispanic	52.6%	26.8%	2,425
Asian, non-Hispanic	29.5%	16.1%	3,290
American Indian, non-Hispanic	8.9%	0.0%	45
Pacific Islander, non-Hispanic	42.9%	21.4%	70
Hispanic	33.3%	15.1%	2,445
Other	48.9%	37.8%	225
Total	36.2%	18.4%	10,265
<i>Renter-Occupied</i>			
White, non-Hispanic	39.5%	23.0%	1,000
Black, non-Hispanic	63.4%	30.7%	2,935
Asian, non-Hispanic	50.4%	30.5%	2,740
Pacific Islander, non-Hispanic	88.9%	0.0%	45
Hispanic	55.3%	23.2%	3,400
Other	45.3%	30.2%	265
Total	54.6%	27.3%	10,385

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

Figure E-34 and Figure E-35 compare overpayment by tenure over time using the 2010-2014 and 2015-2019 ACS. The proportion of overpaying homeowners has decreased in most tracts. Between 20-40 percent of homeowners in most Gardena tracts are cost burdened; 40-60 percent of homeowners in the remaining tracts are cost burdened. Tracts with more cost burdened owner-occupied households are not concentrated in one area in the city.

Concentrations of overpaying renters have generally remained the same since 2014. The proportion of cost burdened renters has decreased in one tract along the northwestern City boundary and the southernmost tract and increased in one tract in the southwestern corner. Between 40 percent and 80 percent of renters are cost burdened in most Gardena tracts. 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). As discussed previously, cost burden is generally more common amongst renters than owners in Gardena.

Sites Inventory. Figure E-34 and Figure E-35 also include the sites inventory used to meet the City's 2021-2029 RHNA. As presented in Table E-21, most RHNA units are located in tracts where 20 percent to 40 percent of households are cost burdened. Conversely, 67.7 percent of RHNA units are in tracts where 60 percent to 80 percent of renters are cost burdened. Over 70 percent of lower income units are in tracts where more than 60 percent of renter households overpay for housing. A slightly larger proportion of lower income units are in tracts where 60 percent to 80 percent of renters are cost burdened compared to moderate (67.2 percent) and above moderate (63.4 percent) income units.

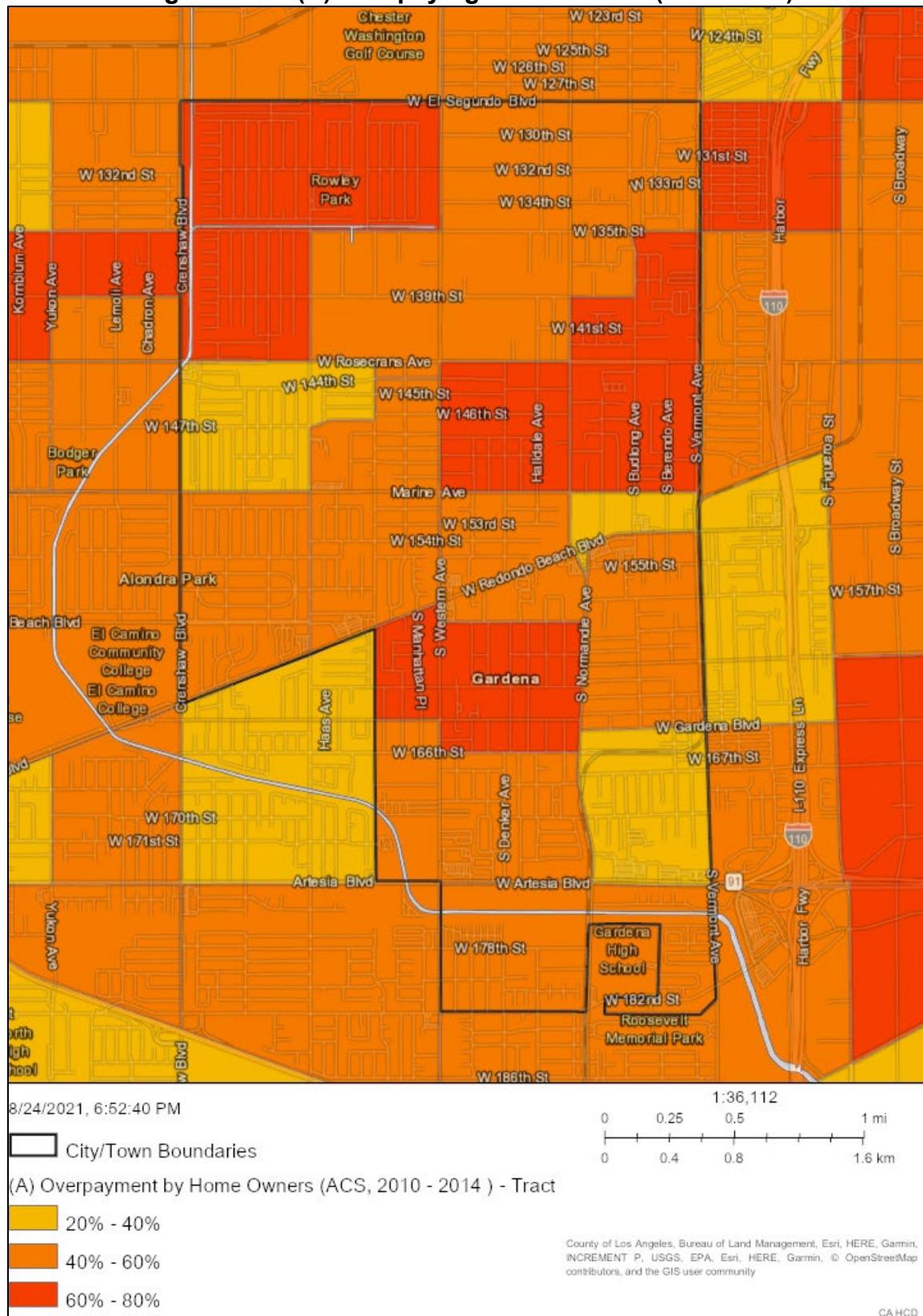
Table E-21: Distribution of RHNA Units by Percent of Cost Burdened Owners

Cost Burdened Owners (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
20-40%	1,912	72.5%	1,294	72.0%	1,592	73.9%	4,798	72.8%
40-60%	724	27.5%	503	28.0%	561	26.1%	1,788	27.1%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

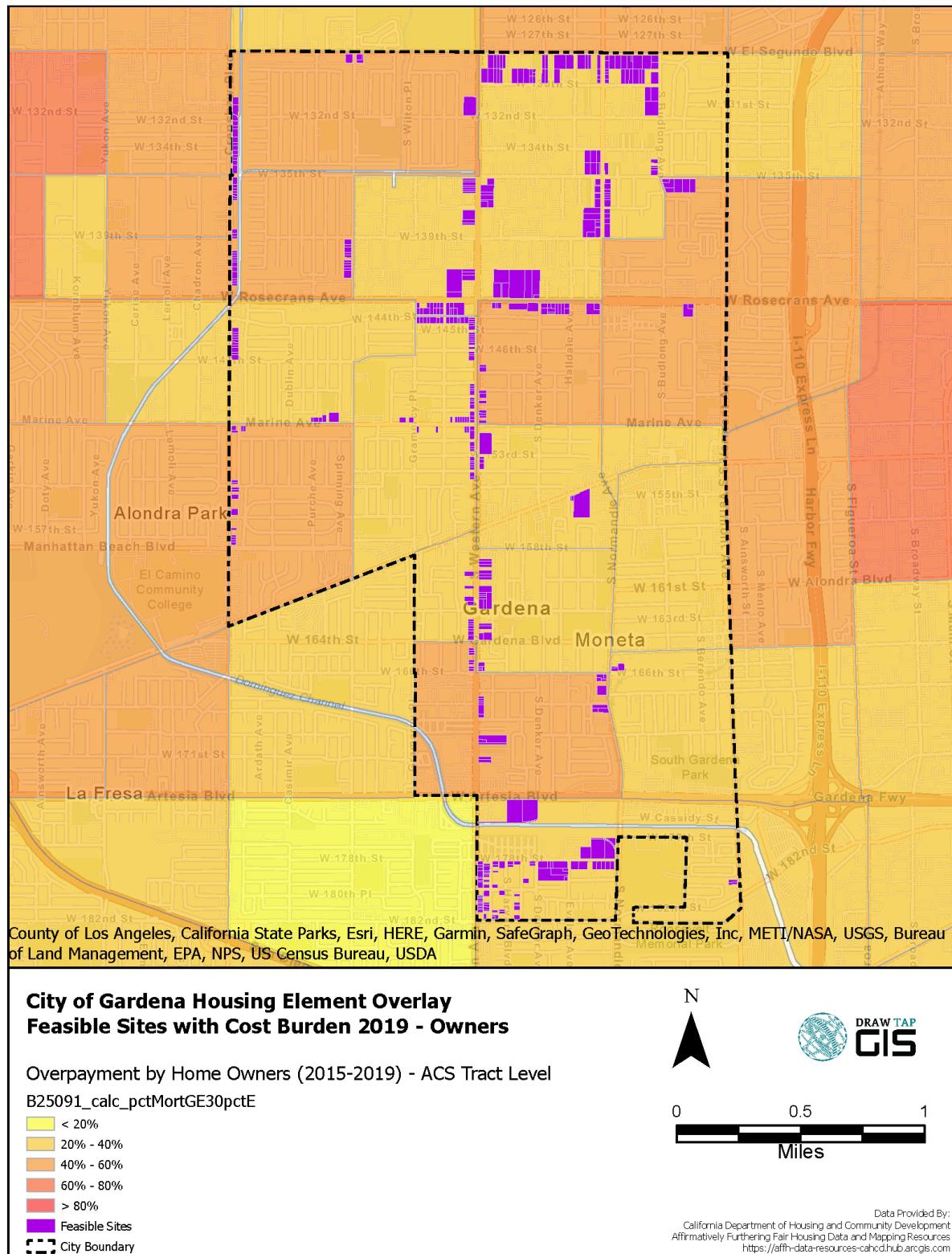
Table E-22: Distribution of RHNA Units by Percent of Cost Burdened Renters

Cost Burdened Renters (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
	Units	Percent	Units	Percent	Units	Percent	Units	Percent
40-60%	753	28.6%	589	32.8%	788	36.6%	2,130	32.3%
60-80%	1,883	71.4%	1,208	67.2%	1,365	63.4%	4,456	67.7%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

Figure E-34: (A) Overpaying Homeowners (2010-2014)

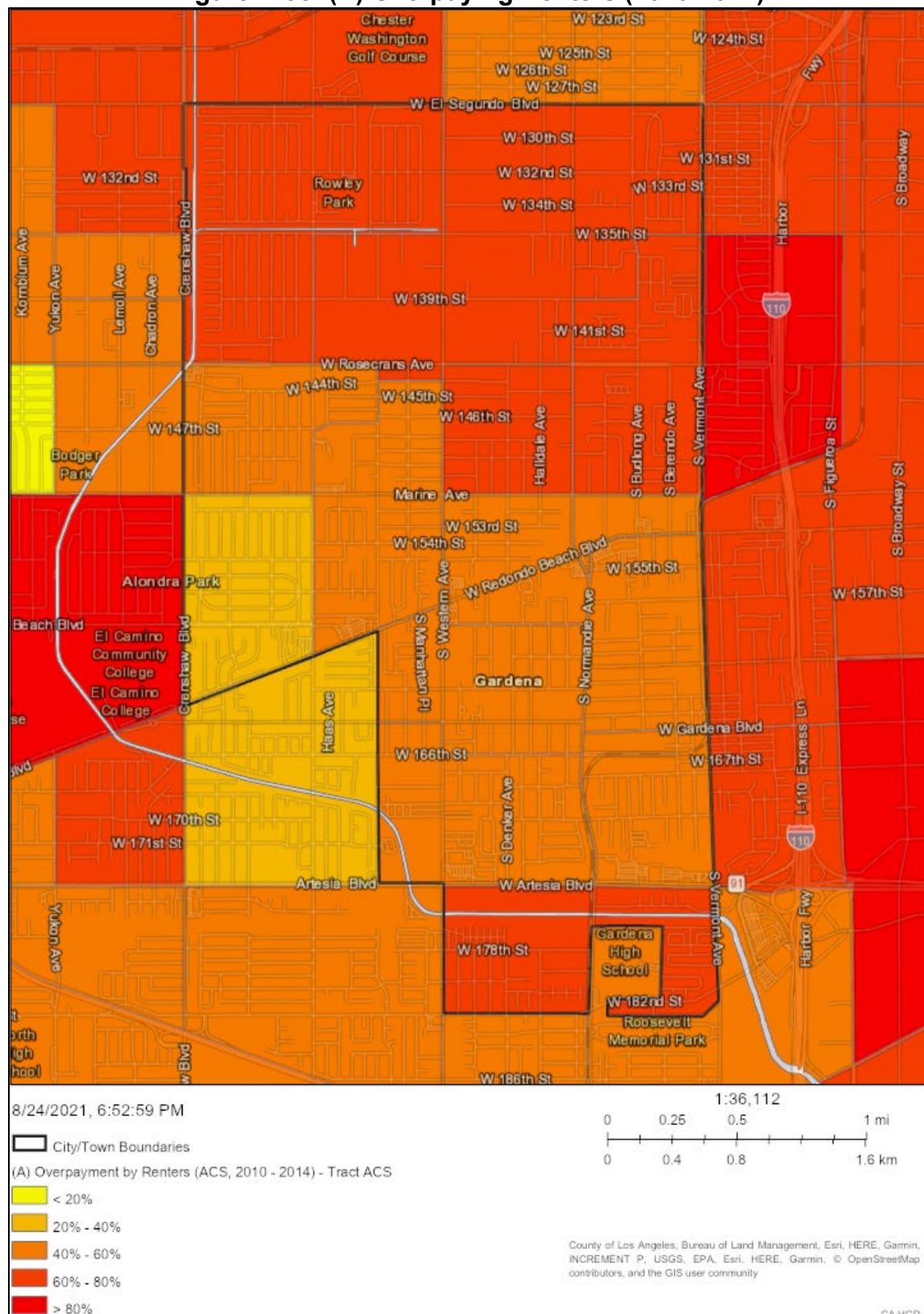


(B) Overpaying Homeowners (2015-2019) and Sites Inventory

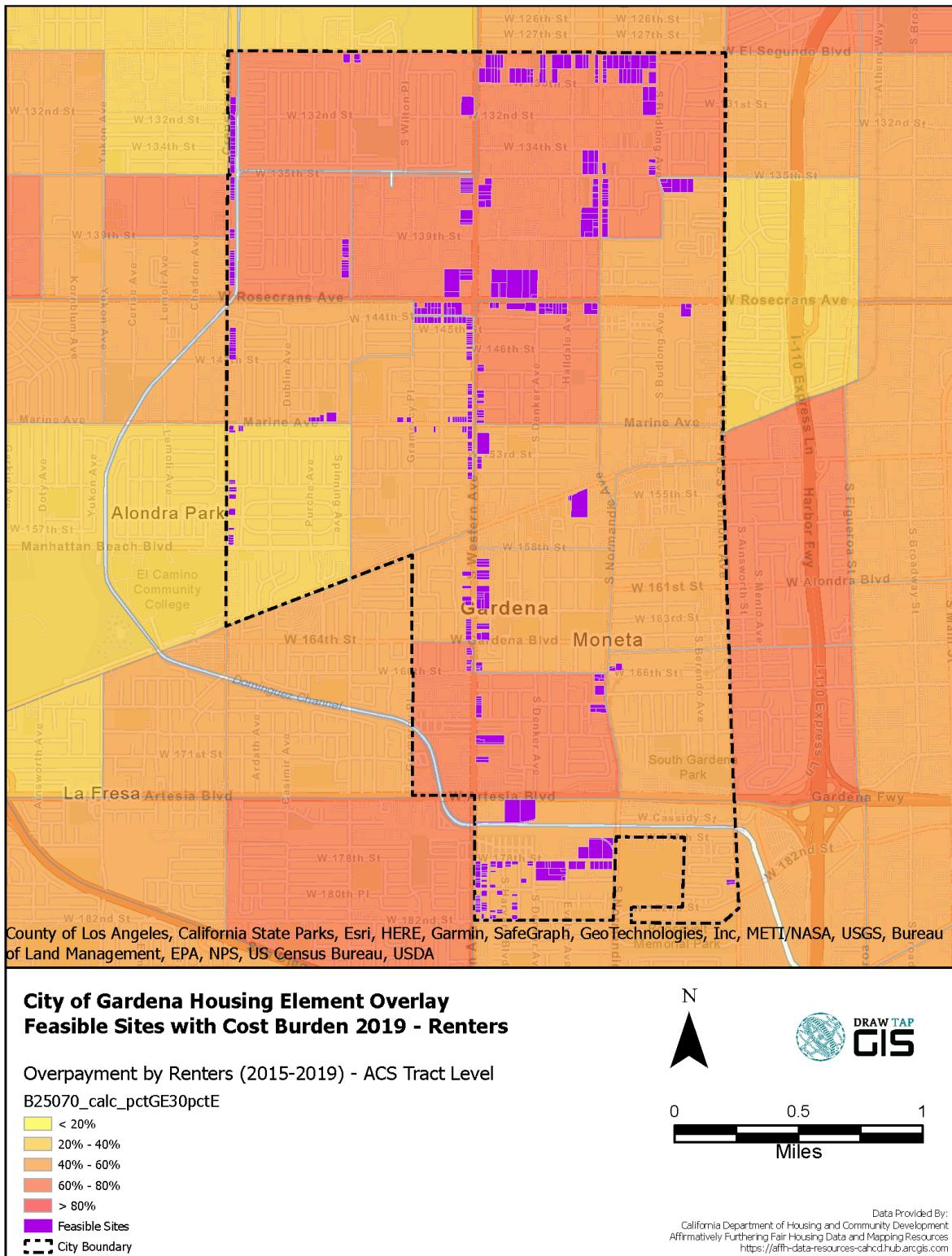


Source: HCD AFFH Data Viewer, 2010-2014 & 2015-2019 ACS, 2021.

Figure E-35: (A) Overpaying Renters (2010-2014)



(B) Overpaying Renters (2015-2019) and Sites Inventory



Source: HCD AFFH Data Viewer, 2010-2014 & 2015-2019 ACS, 2021.

Overcrowding

A household is considered overcrowded if there is more than one person per room and severely overcrowded if there is more than 1.5 persons per room. HUD CHAS data based on the 2013-2017 ACS and the HCD AFFH Data Viewer (2015-2019 ACS) is used to show overcrowding in Gardena and Los Angeles County.

Regional Trend. As shown in Table E-23, 5.7 percent of owner-occupied households and 16.7 percent of renter-occupied households throughout the County are overcrowded. Severe overcrowding is also an issue in the County, especially amongst renter households. Over one percent of owner households and 7.6 percent of renter households are severely overcrowded.

Figure E-36 shows concentrations of overcrowded households by tract regionally. Overcrowded households are most concentrated in the central County areas, including the City of Los Angeles, South Gate, and Compton, and in parts of the San Fernando Valley.

Local Trend. Table E-23, below, shows that 6.2 percent of owner-occupied households and 12.5 percent of renter-occupied households in Gardena are overcrowded. Countywide, only 5.7 percent of owner-occupied households are overcrowded, but 16.7 percent of renter-occupied households are overcrowded.

Figure E-37 shows the concentration of overcrowded households in Gardena by census tract. There is a concentration of overcrowded households in the northeast corner of the city, where more than 20 percent of households in those tracts are overcrowded. Less than 8.2 percent of households in tracts along the western and southern city boundaries are overcrowded. Census tracts with severely overcrowded households are shown in Figure E-24. Approximately 14 percent of households in one tract in the northeastern section of the city are severely overcrowded. Less than 5 percent of households are severely overcrowded in the remainder of the city. The tracts with larger proportions of overcrowded and severely overcrowded households are categorized as low resource areas and have concentrations of racial and ethnic minorities, LMI households, and children in female-headed households (see Figure E-5, Figure E-12, Figure E-14, and Figure E-21). Cost burdened renters are also more prominent in this area (see Figure E-35).

Table E-23: Overcrowding by Tenure

	Overcrowded (>1 person per room)		Severely Overcrowded (>1.5 persons per room)		Total Households
	Households	Percent	Households	Percent	
Gardena					
Owner-Occupied	640	6.2%	205	2.0%	10,265
Renter-Occupied	1,300	12.5%	630	6.1%	10,385
Los Angeles County					
Owner-Occupied	85,870	5.7%	23,025	1.5%	1,512,365

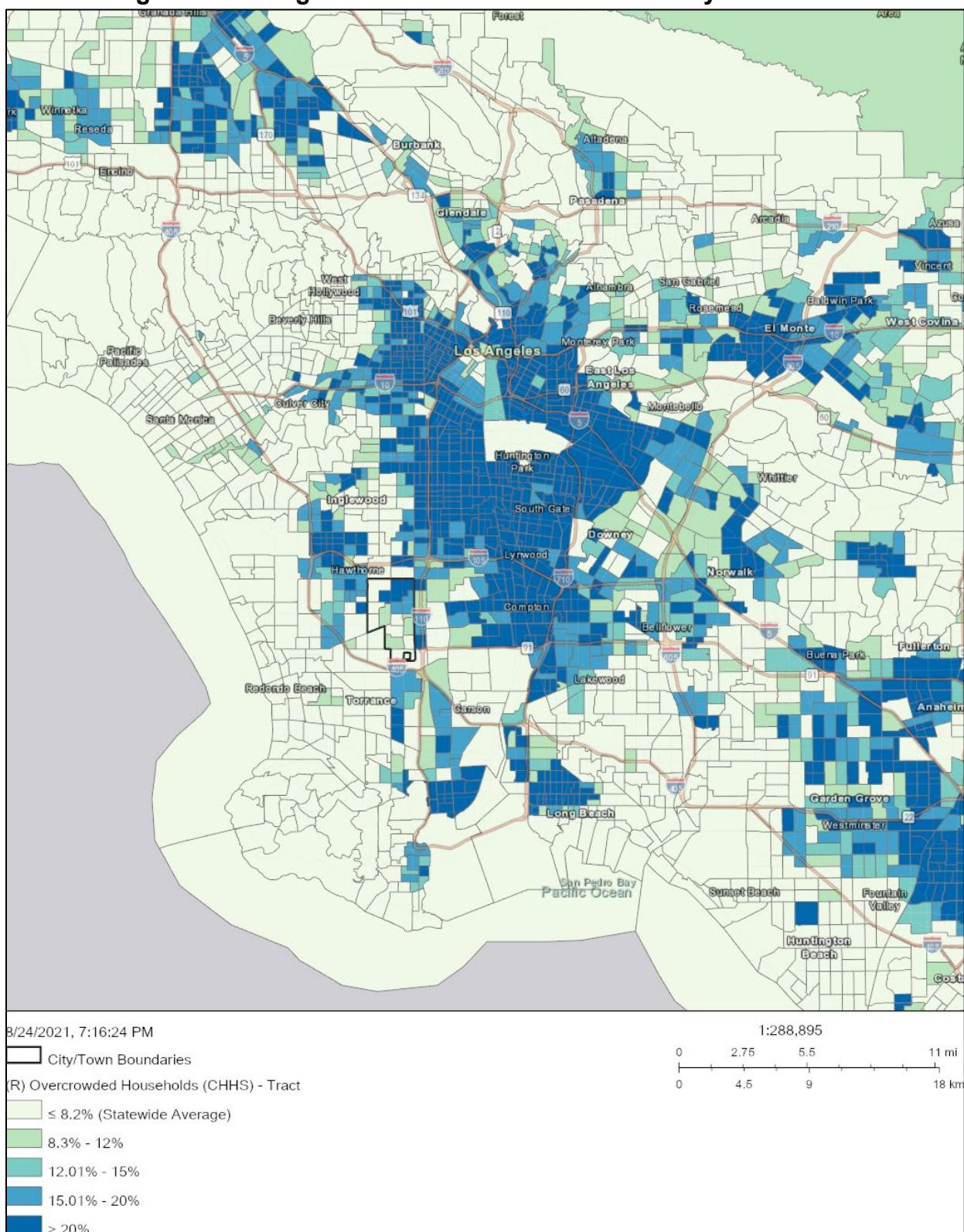
Renter-Occupied	298,460	16.7%	134,745	7.6%	1,782,835
Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.					

Sites Inventory. As presented in Table E-24, nearly half of the units selected to meet the 2021-2029 RHNA are in tracts where more than 20 percent of households are overcrowded. A smaller share of lower income RHNA units are in tracts where less than 8.2 percent of households are overcrowded compared to moderate and above moderate income units.

Table E-24: Distribution of RHNA Units by Percent of Overcrowded Households

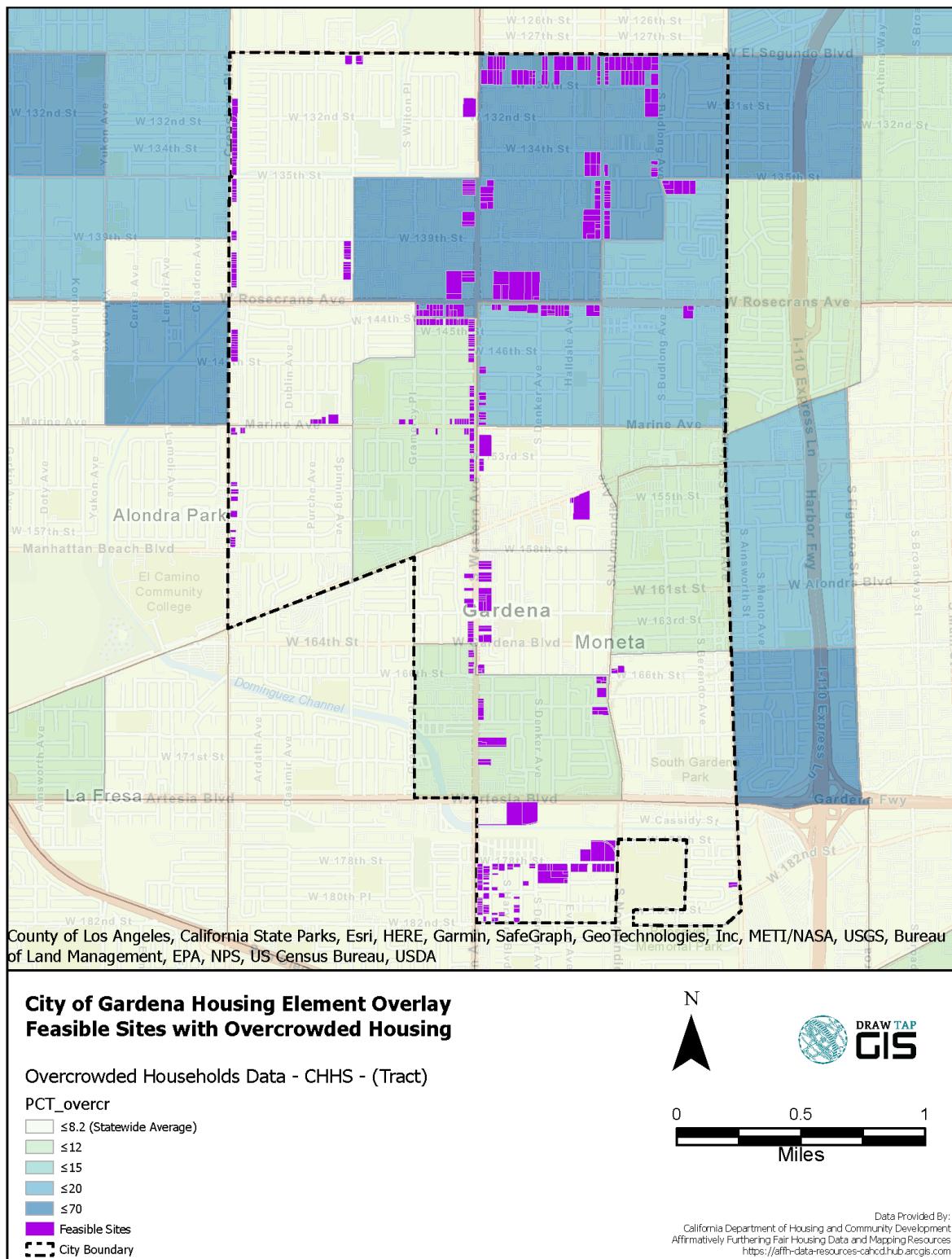
Overcrowded Households (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
<8.2%	770	29.2%	544	30.3%	806	37.4%	2,120	32.2%
<12%	271	10.3%	152	8.5%	229	10.6%	652	9.9%
<15%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<20%	253	9.6%	179	10.0%	178	8.3%	610	9.3%
>20%	1,342	50.9%	922	51.3%	940	43.7%	3,204	48.6%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586	100.0%

Figure E-36: Regional Overcrowded Households by Tract



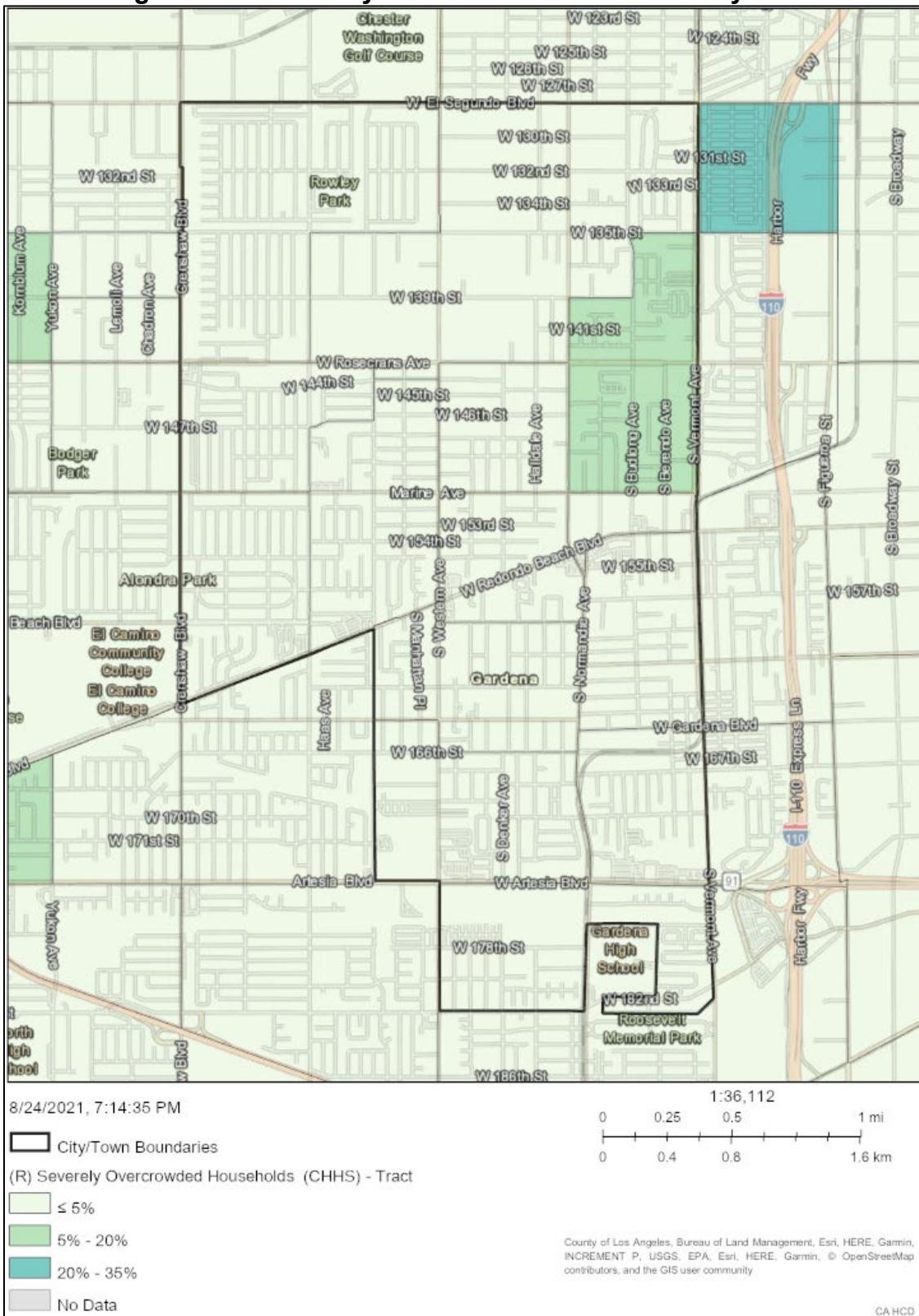
Source: HCD AFFH Data Viewer, HUD CHAS data, 2021.

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



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

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

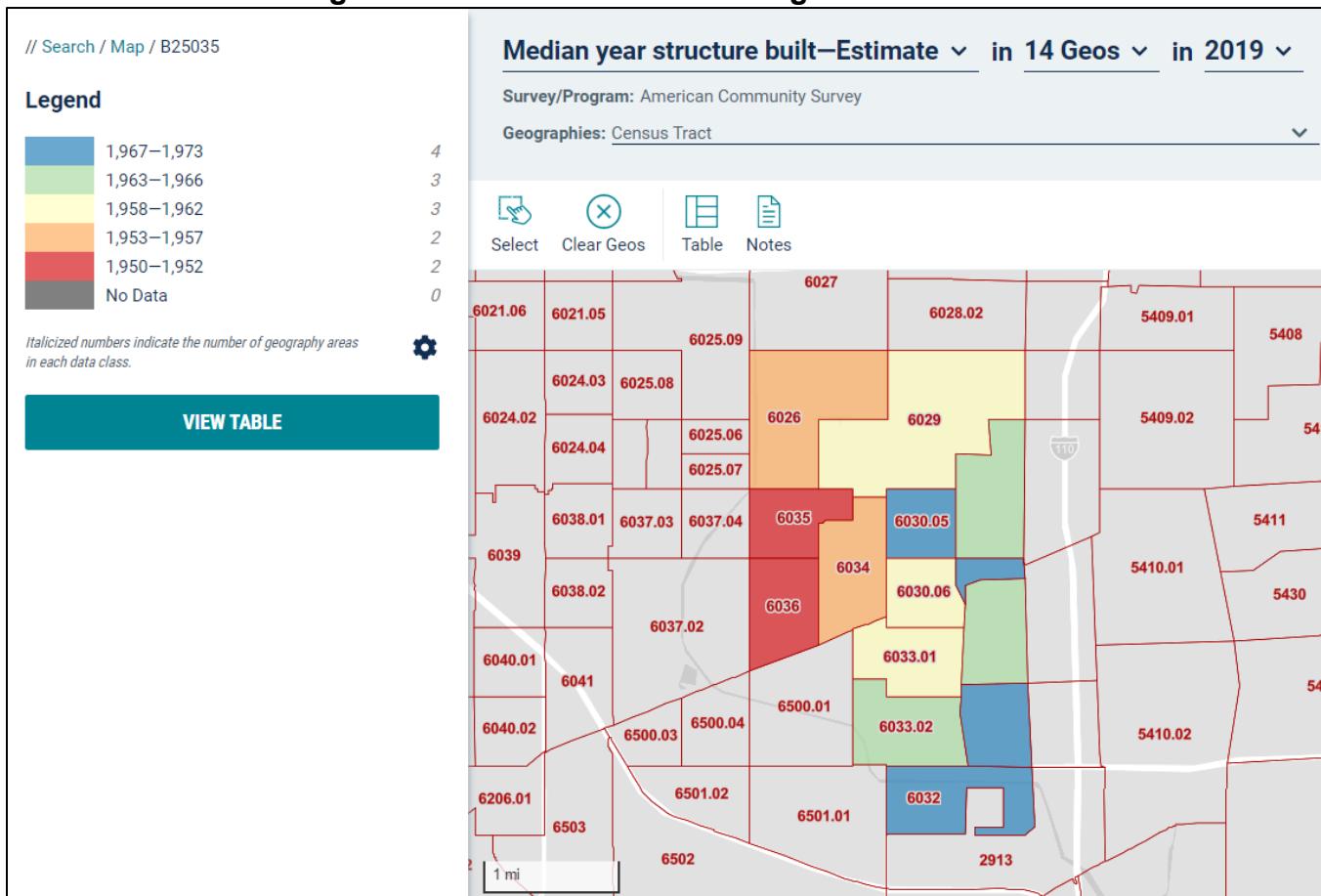
(Table E-26). Tracts 6035, 6034, and 6026 have the highest proportion of housing units aged 50 or older. Figure E-39 shows the median year built for housing units by census tract. Tracts with older housing units are most concentrated in the northwest section of the city. Tracts 6032 and 6031.02, located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



Note: The numbers in the legend represent years (1,967 = 1967).

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

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.

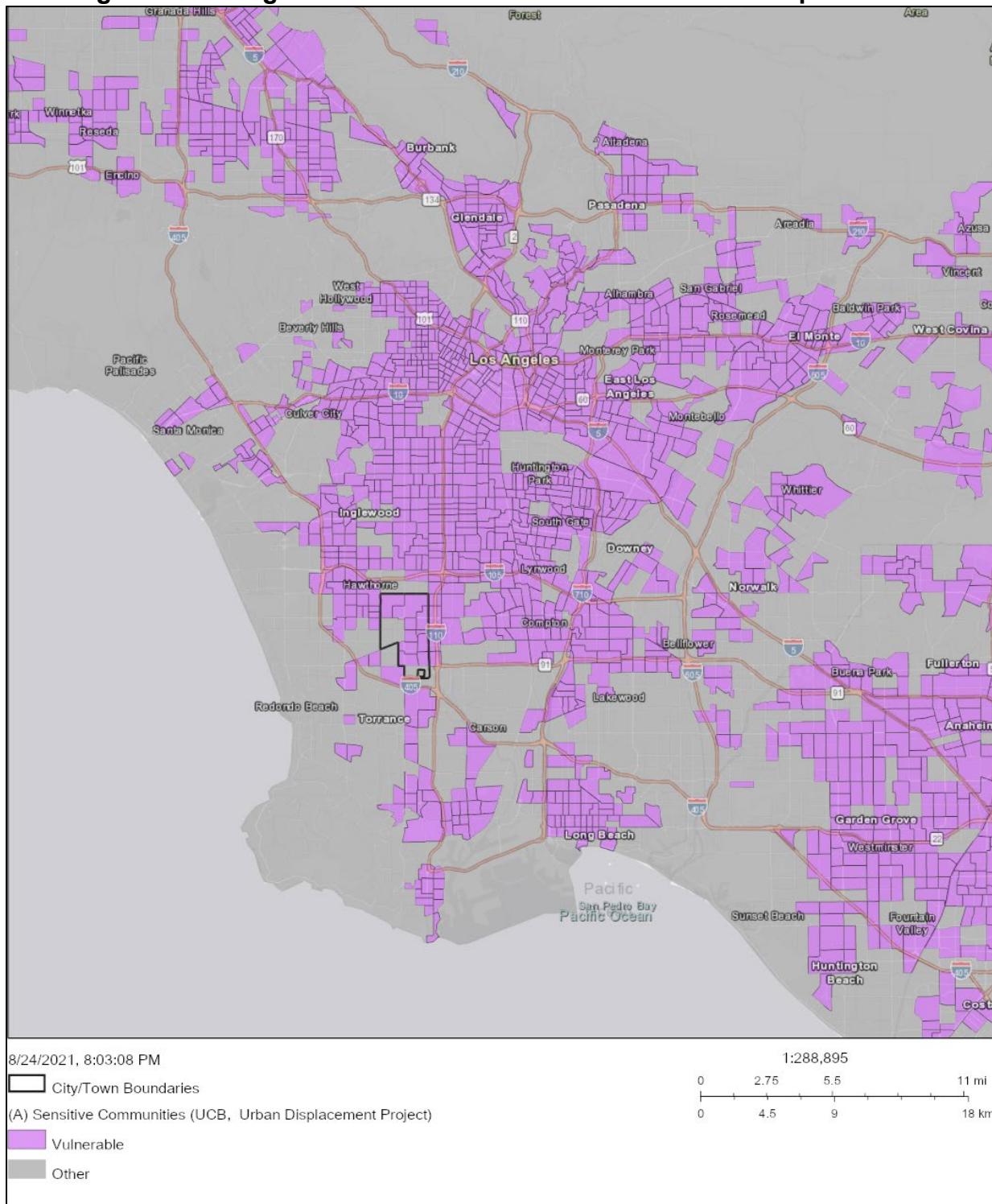
Local Trend. As shown in Figure E-41, the majority of tracts in Gardena are considered sensitive communities where the population is vulnerable to displacement in the event of increased redevelopment or shifts in housing cost. Three tracts in the central western section of the city and the southernmost 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

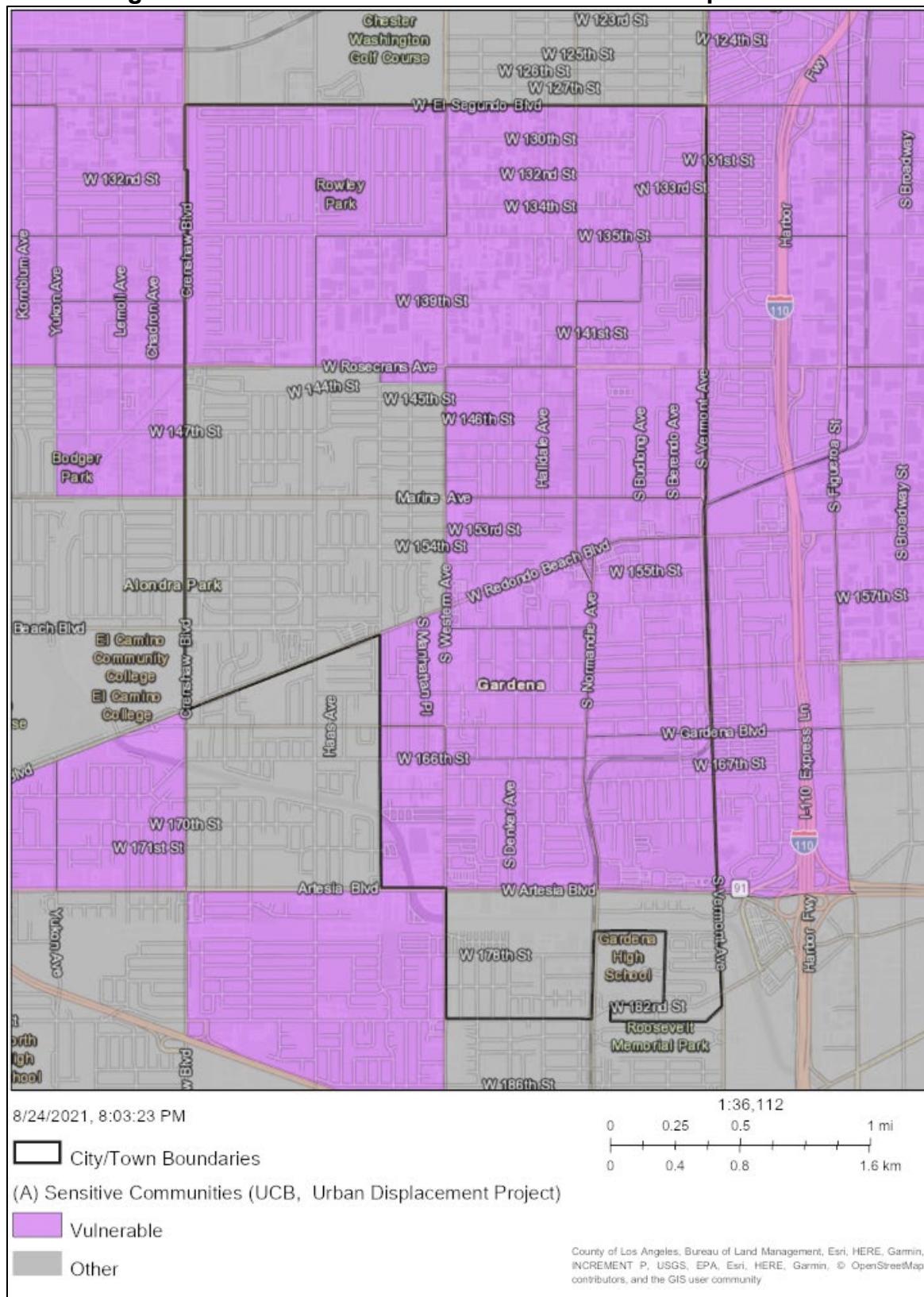
Sensitive Community (Tract)	Lower Income Units		Moderate Income Units		Above Moderate Income Units		All RHNA Units	
Not a Sensitive Community	448	17.0%	375	20.9%	572	26.6%	1,395	21.2%
Sensitive Community	2,188	83.0%	1,422	79.1%	1,581	73.4%	5,191	78.8%
Total	2,636	100.0%	1,797	100.0%	2,153	100.0%	6,586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

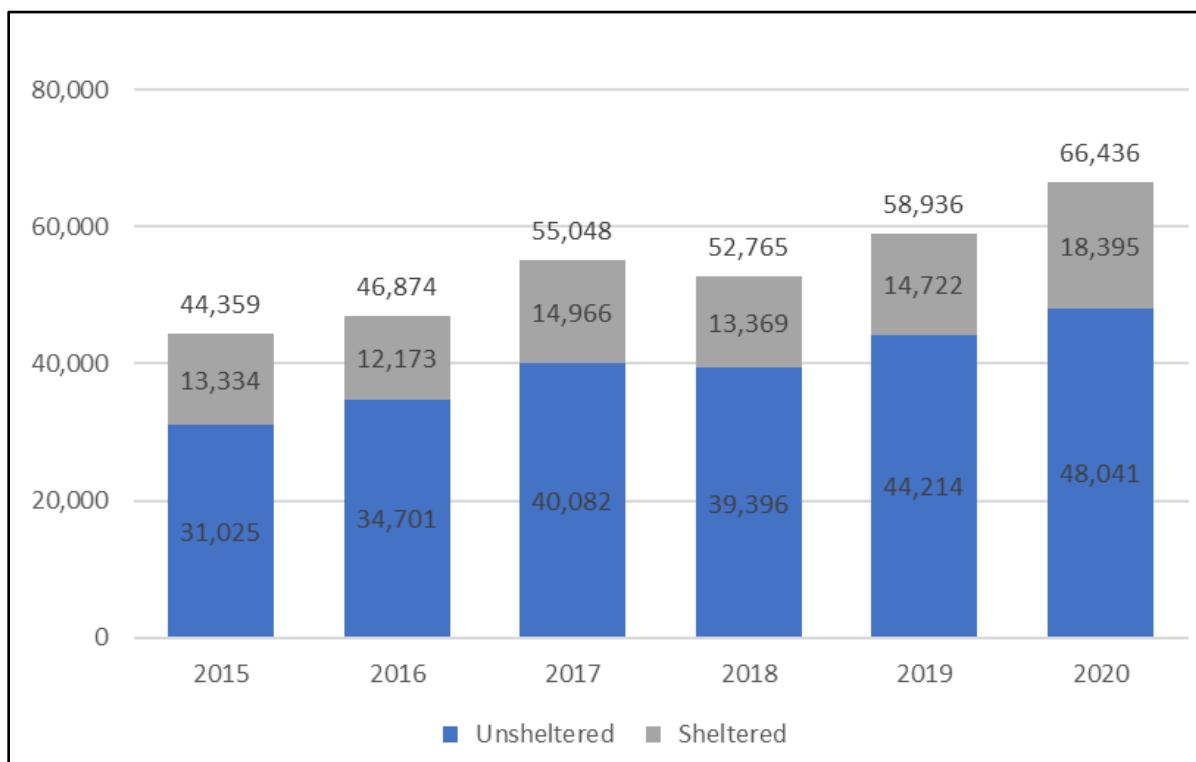


Source: HCD AFFH Data Viewer, Urban Displacement Project, 2021.

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).

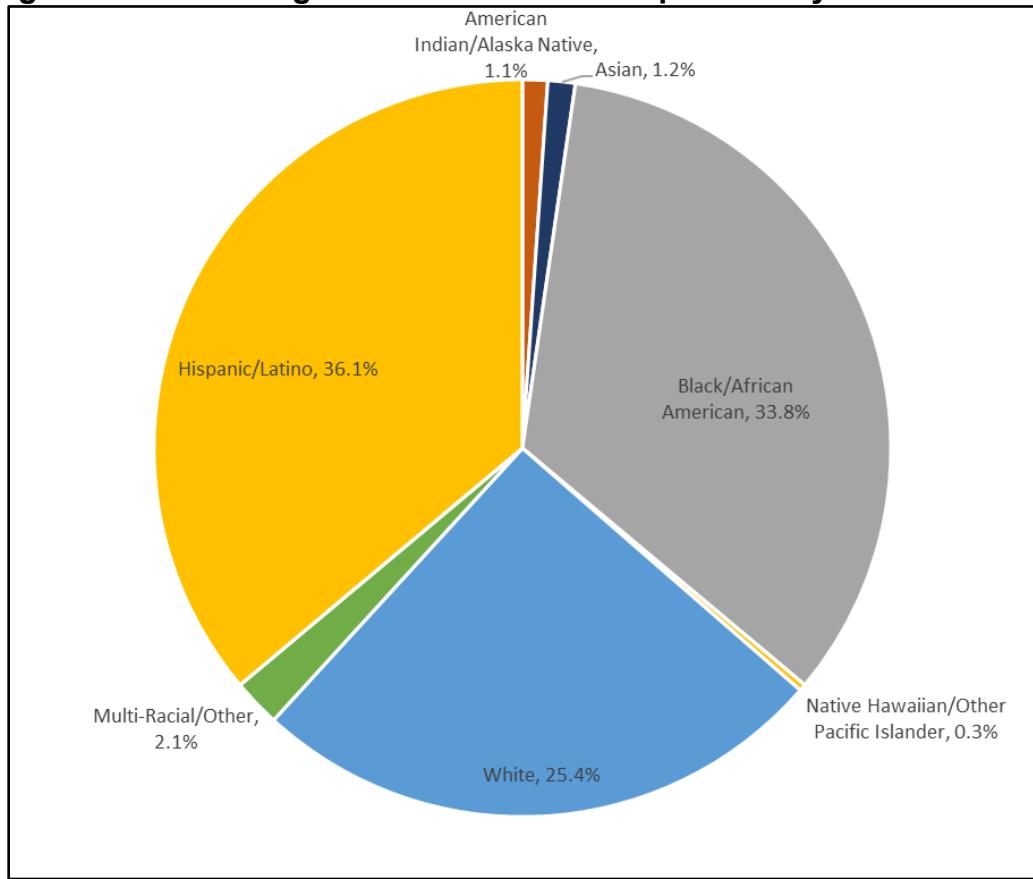
Table E-29: Homeless Populations and Special Needs Groups

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

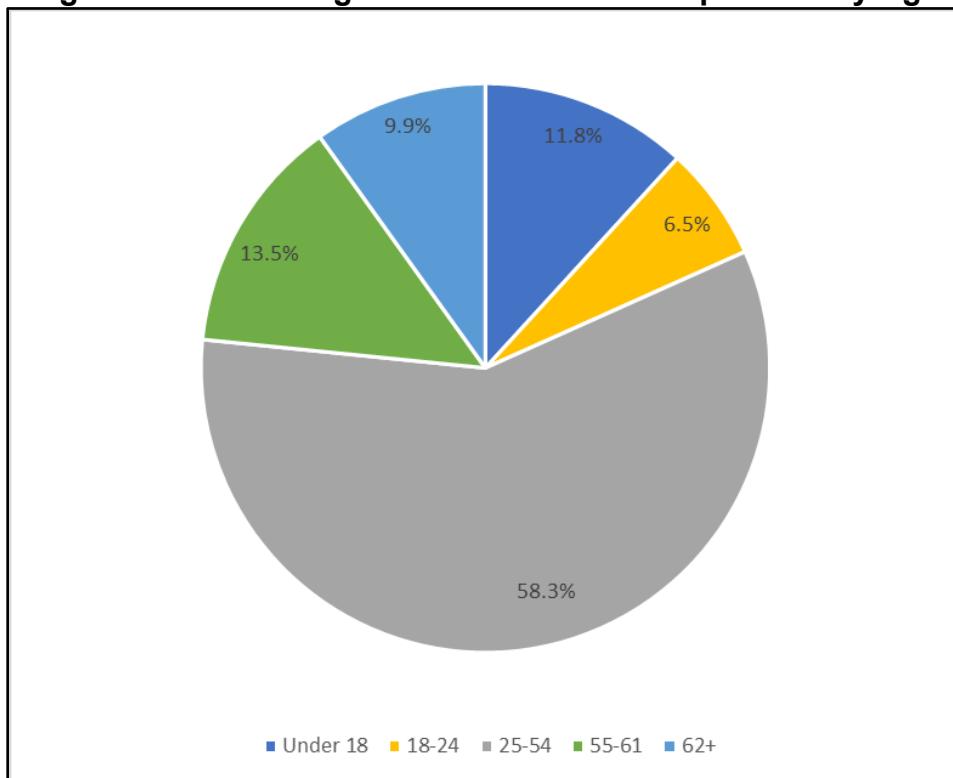


Race/Ethnicity	Homeless Population		% LA County Population
	Persons	Percent	
American Indian/Alaska Native	686	1.1%	0.2%
Asian	774	1.2%	14.4%
Black/African American	21,509	33.8%	7.8%
Hispanic/Latino	23,005	36.1%	48.5%
Native Hawaiian/Other Pacific Islander	205	0.3%	0.2%
White	16,208	25.4%	26.2%
Multi-Racial/Other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

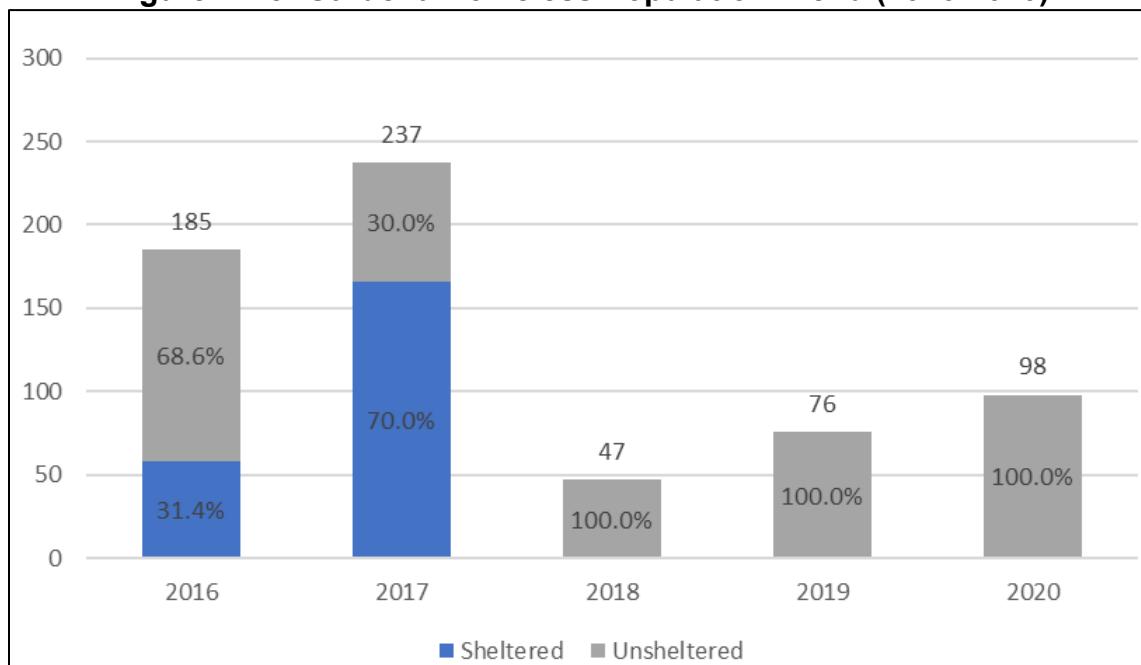


Age	Homeless Population		% LA County Population
	Persons	Percent	
Under 18	7,491	11.8%	22.0%
18-24	4,181	6.6%	9.7%
25-54	37,138	58.3%	43.2%
55-61	8,606	13.5%	8.7%
62+	6,290	9.9%	16.4%

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.

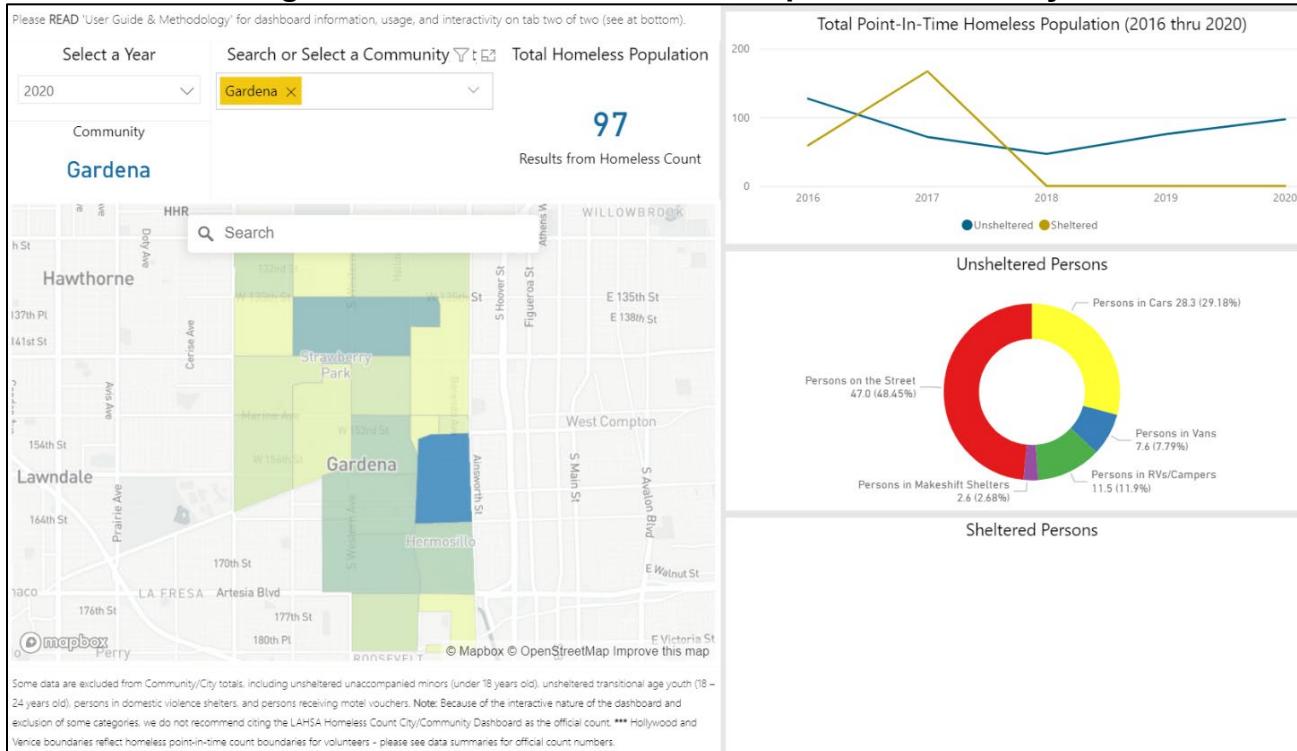
Figure E-45: Gardena Homeless Population Trend (2016-2020)



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.

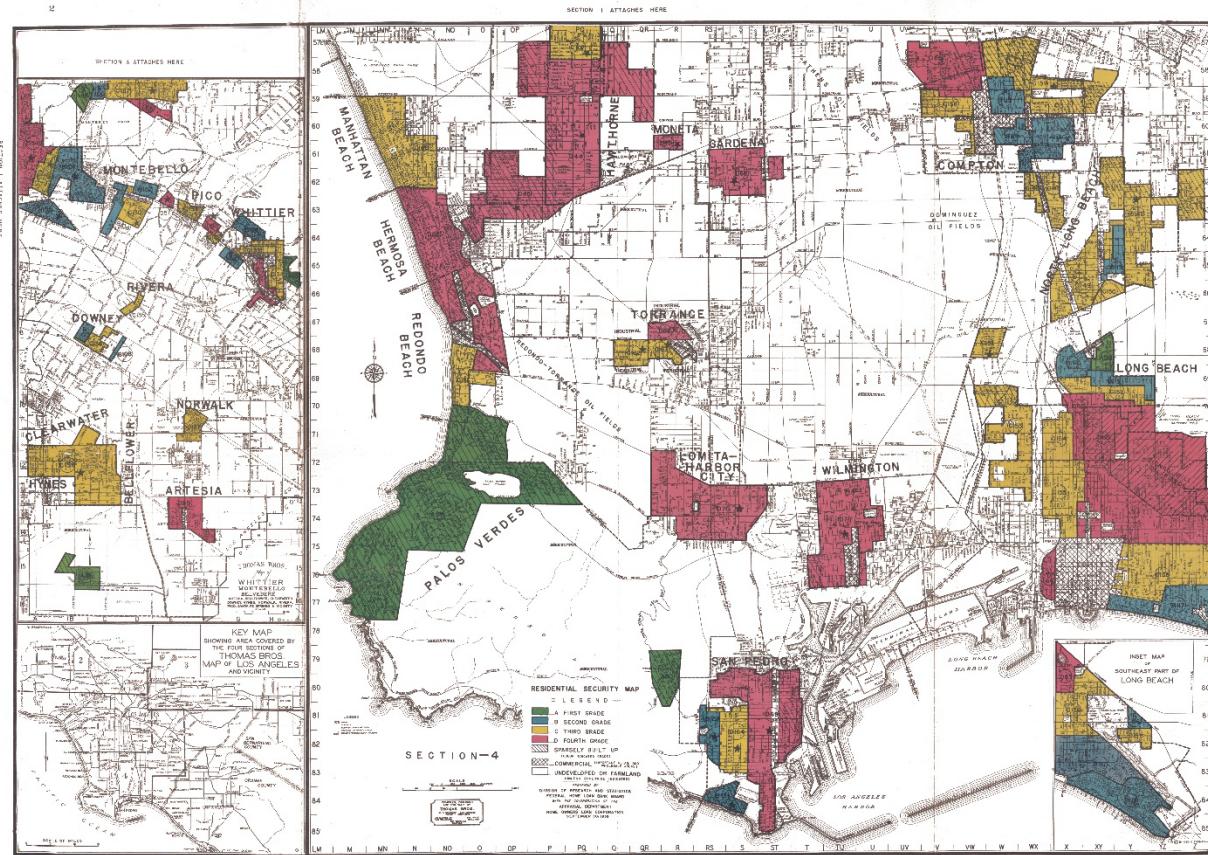
⁴ Los Angeles County Library. (2021). Gardena – Community History, <https://lacountylibrary.org/gardena-local-history/>.

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.

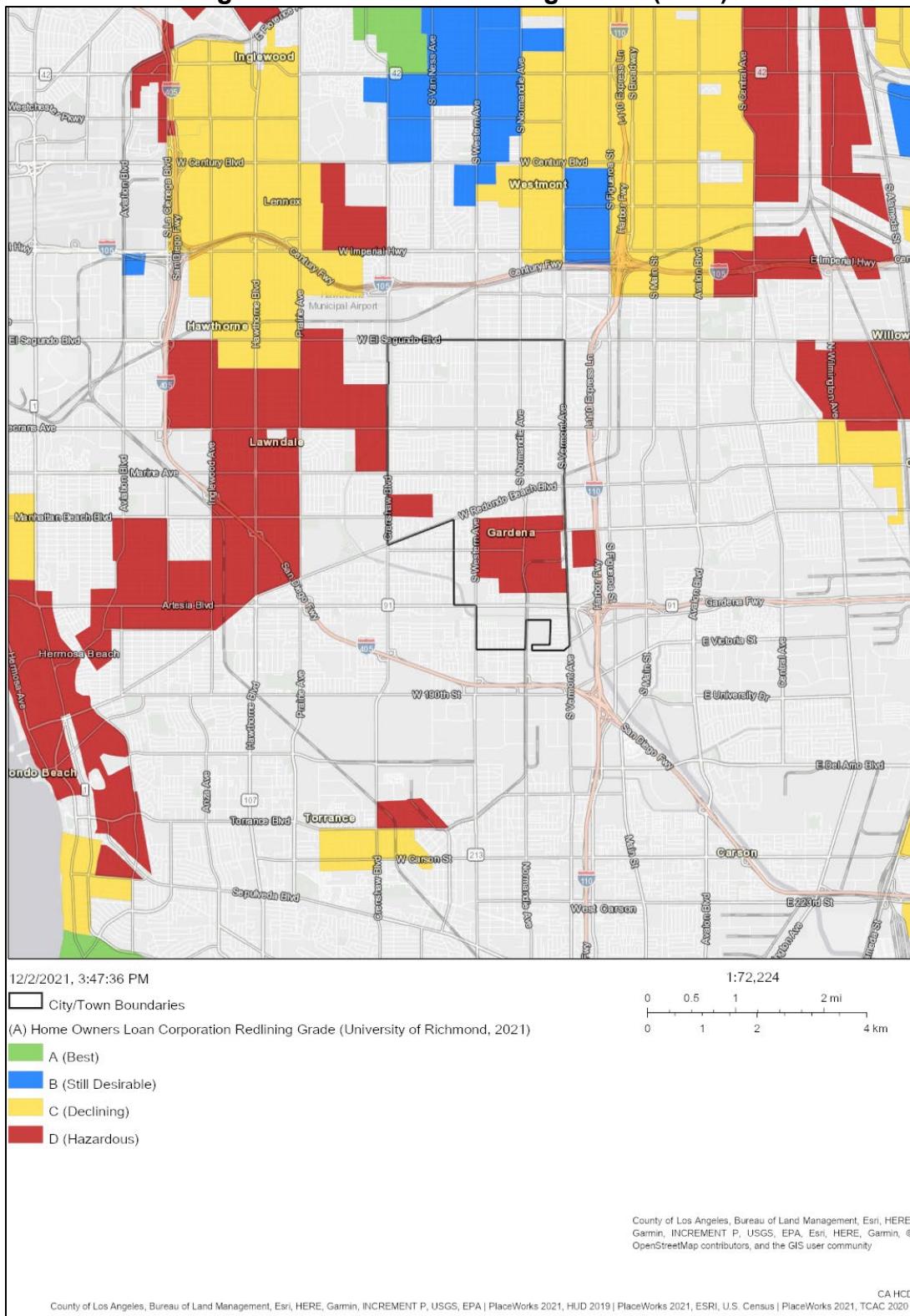
⁷ History and Social Justice. (2021). <https://justice.tougaloo.edu>,

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)

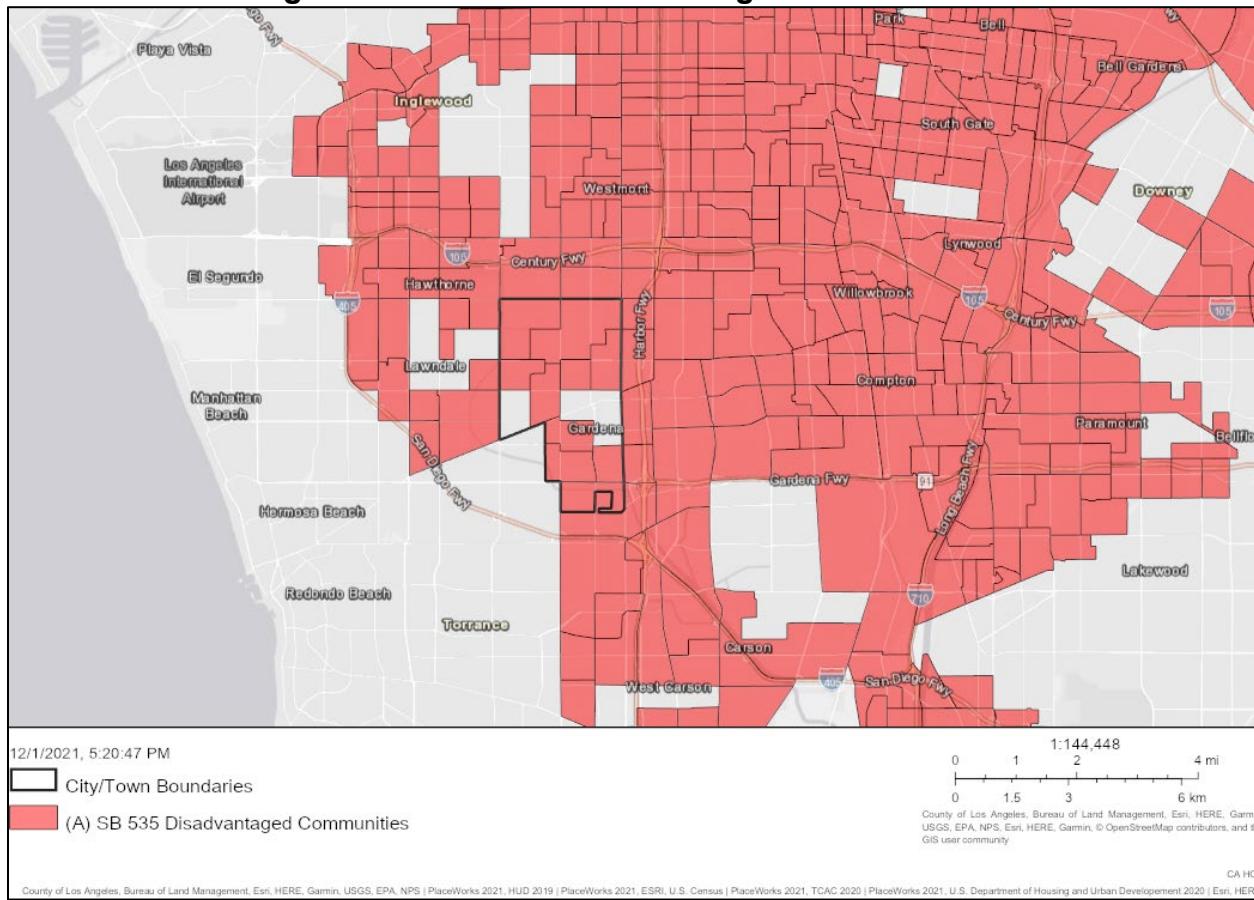


Source: HCD AFFH Data Viewer, University of Richmond (2021), 2021.

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;

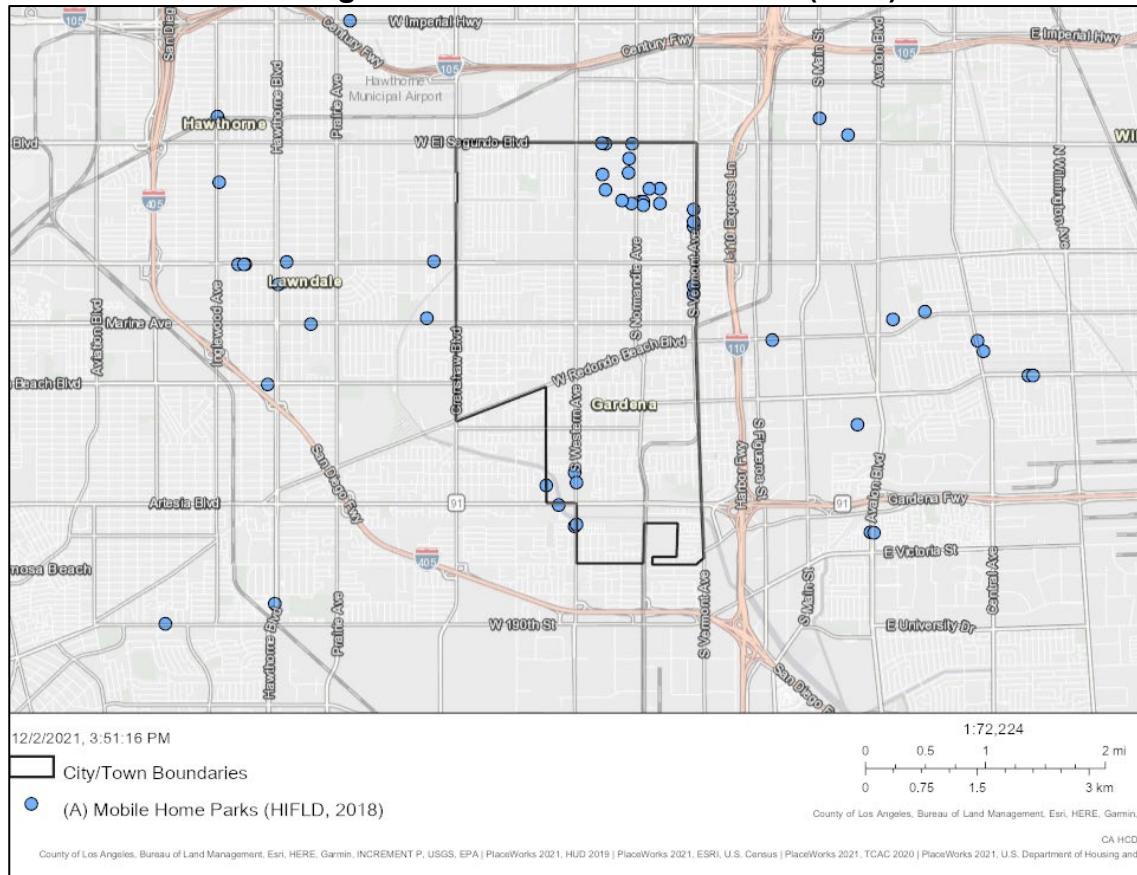
- Concentrations of children living in single-parent female-headed households exceeding 20 percent;
- Concentrations of LMI areas where more than 50 percent of households are low or moderate income;
- Low resource area designations;
- Lower jobs proximity indices;
- Higher rates of cost burdened renters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

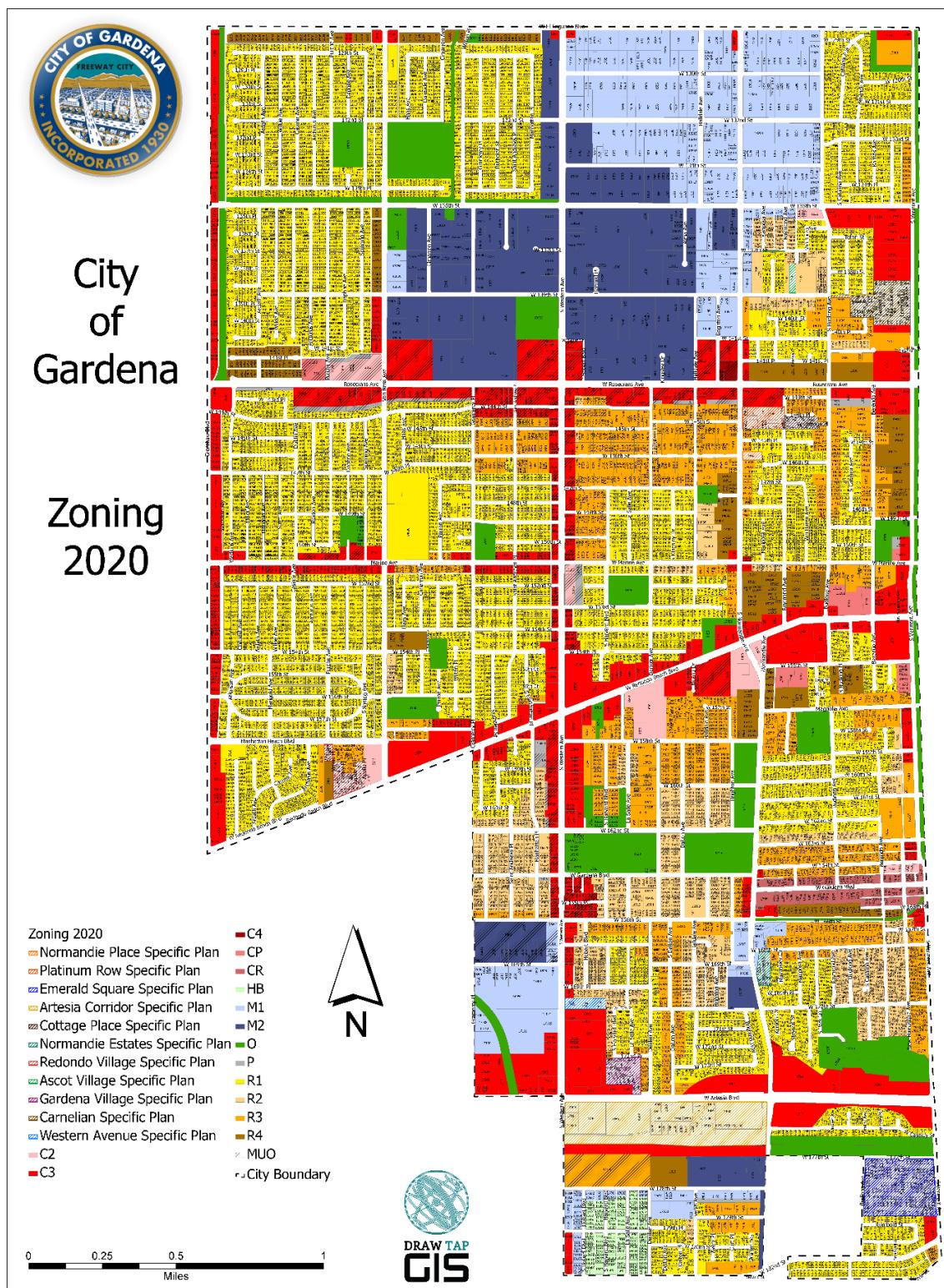
There are also five subsidized housing projects located in the City: Gardena Senior Housing (73 affordable units), Gardena South Park Sr. Citizens (126 affordable units), Gardena Marine Av Sr Housing (79 affordable units), Casimir House (three affordable units), and Spring Park (36 affordable units). 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)

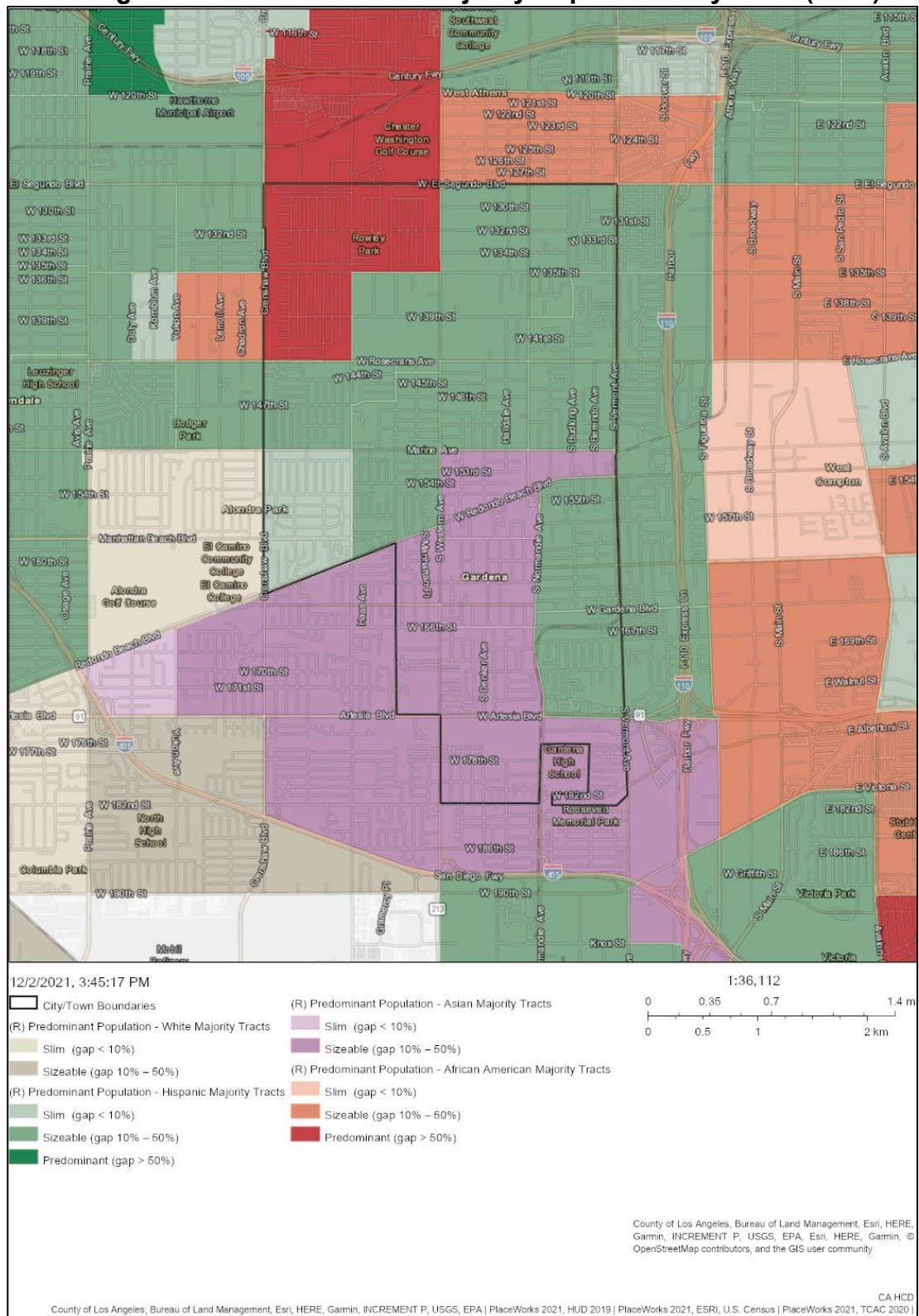
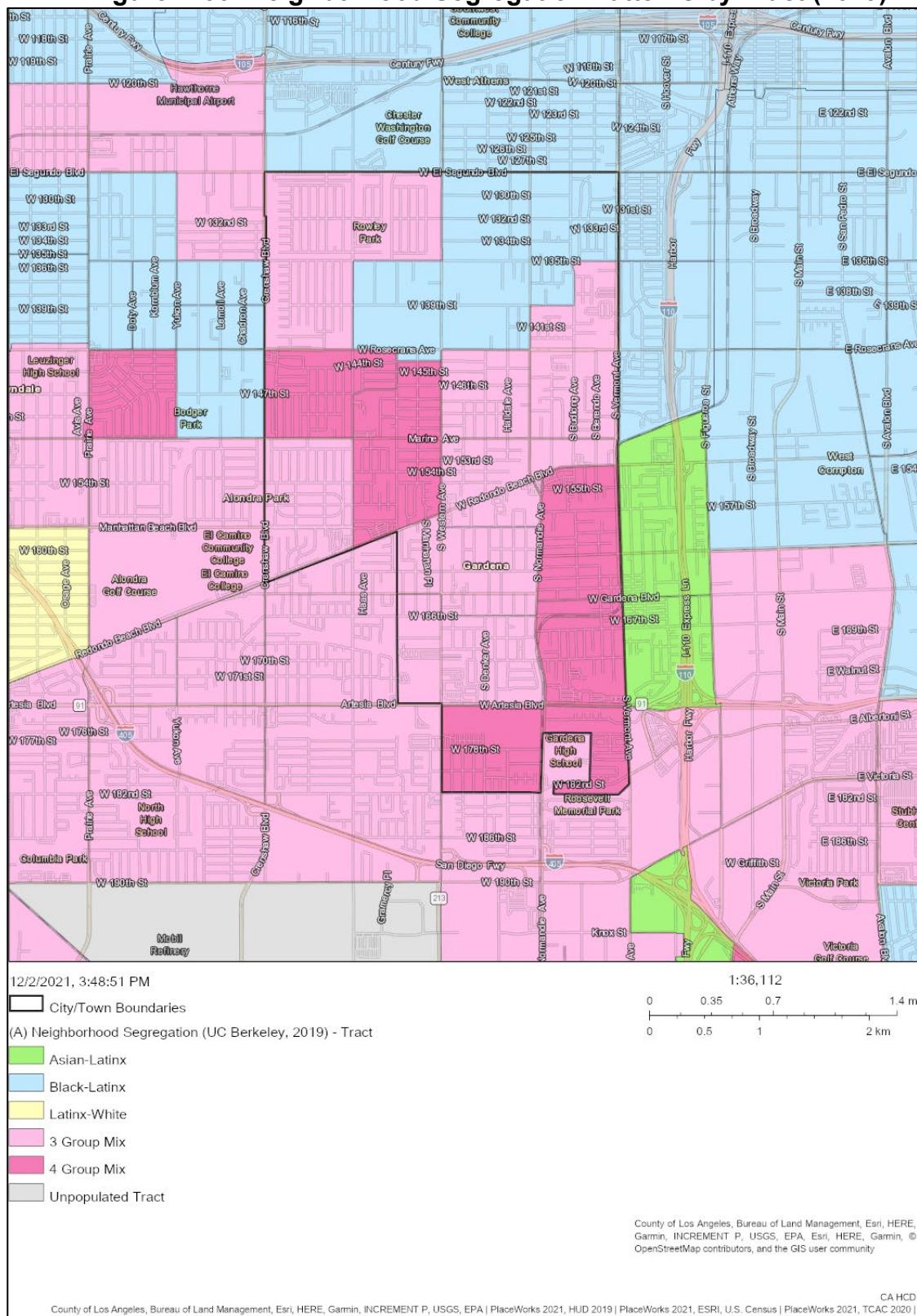


Figure E-53: Neighborhood Segregation Patterns by Tract (2019)



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

Environmental Justice Element

Authority

Senate Bill 1000 (SB 1000), the Planning for Healthy Communities Act, was signed into law by Governor Edmond G. Brown, Jr. on September 24, 2016, mandating that cities and counties with disadvantaged communities (defined below) adopt an Environmental Justice (EJ) Element or integrate EJ goals, objectives, and policies into other elements of their General Plans, with the intent to create healthier cities and counties by protecting sensitive land uses and prioritizing the needs of disadvantaged communities.

The term “disadvantaged community” is a broad designation that includes any community disproportionately affected by environmental, health, and other burdens or low-income areas disproportionately affected by environmental pollution and other hazards. In relation to environmental justice, disadvantaged communities typically disproportionately face the burdens of environmental hazards. Government Code Section 65302, as amended by SB 1000, defines a disadvantaged community as follows:

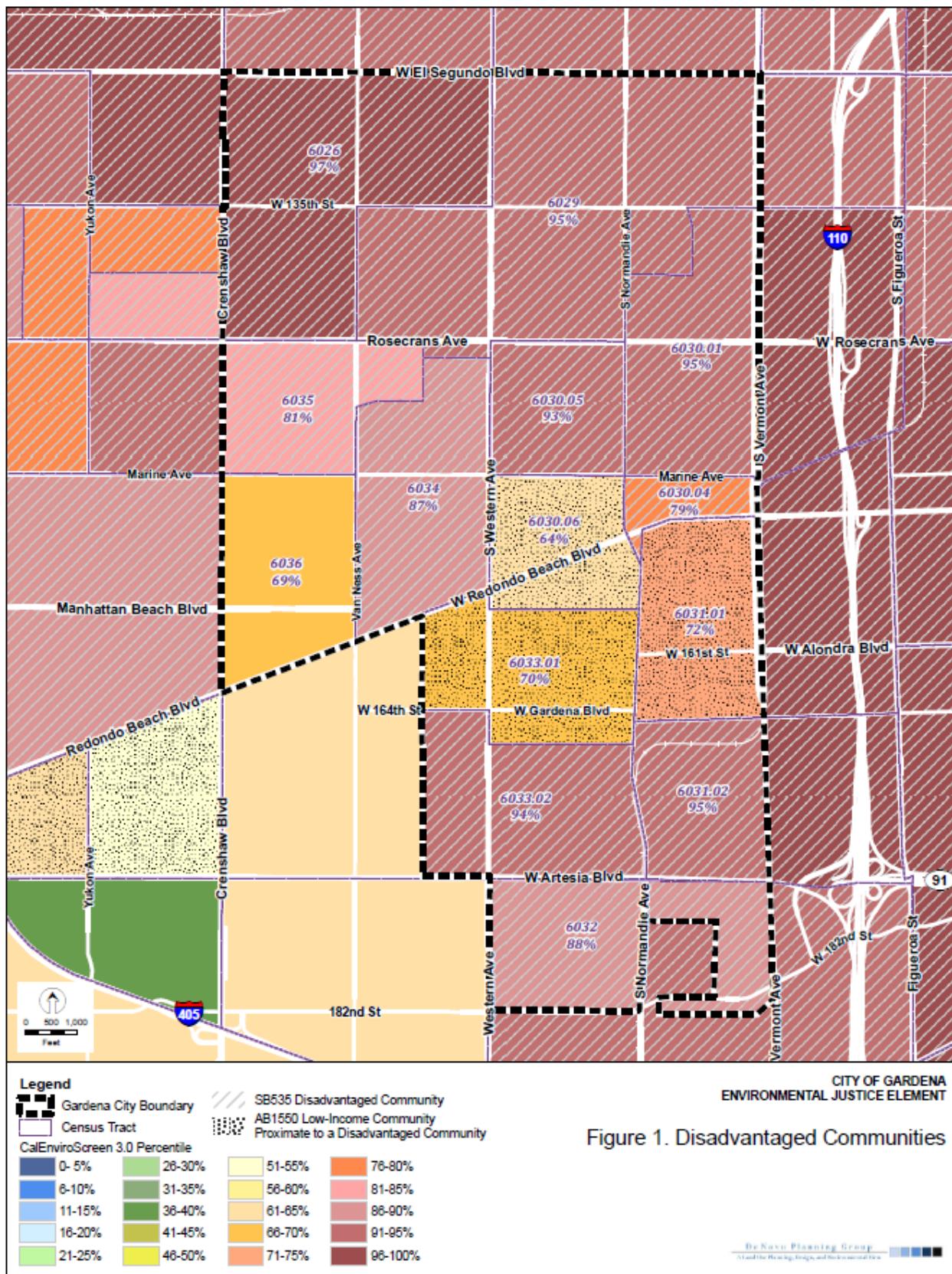
A Disadvantaged Community (DAC) is “An area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.”

The Office of Environmental Health Hazard Assessment (OEHHA), on behalf of the California Environmental Protection Agency (CalEPA), produces an online map called the California Communities Environmental Health Screening Tool (CalEnviroScreen). CalEnviroScreen identifies communities that are disproportionately affected by environmental hazards. It is a science-based tool that uses existing environmental, health, and socioeconomic data to rank all census tracts in California with a CalEnviroScreen score. CalEPA designates the tracts with a CalEnviroScreen score in the top 25 percentile as DACs.

Based on CalEnviroScreen, 10 out of 14 census tracts within the City of Gardena have a CalEnviroScreen score in the top 25 percentile, as illustrated in Figure 1, qualifying them as DACs. This means that Gardena is required to prepare an EJ Element to satisfy SB 1000. This determination will be regularly evaluated and updated, as necessary.

Under Assembly Bill 1550, low-income communities located within ½ mile of a CalEPA-identified DAC are also considered an ‘environmental justice community’. These communities can be identified using the California Air Resources Board (CARB) Priority Populations Mapping Tool. Based on this assessment, three more census tracts in Gardena (beyond the 10 identified via CalEnviroScreen) can be considered DACs and are also shown in Figure 1. In total, the City has 13 census tracts (out of 14) that are considered disadvantaged communities. More information about each DAC census tract in Gardena can be found in the Environmental Justice White Paper (Appendix A).

Environmental Justice Element



Environmental Justice Element

Purpose

The purpose of the EJ Element is to identify goals and policies that promote environmental justice citywide with a focus on reducing disproportionate impacts on DACs.

The U.S. Environmental Protection Agency defines **environmental justice** as “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.”

The City is committed to supporting the long-term needs of our community's most vulnerable populations. Low-income residents, communities of color, indigenous peoples, and immigrant communities have disproportionately experienced some of the greatest environmental burdens and related health problems throughout this region. This inequity is the result of many historic and social influences, including those related to zoning, land ownership, lending practices, economics, public health, and politics. This document hopes to contribute toward remedying environmental injustices and problems caused by:

- Zoning and land use planning practices that promote development patterns which tend to concentrate pollution and environmental hazards in certain communities, and the placement of economic and environmental benefits in areas outside of environmentally burdened communities;
- Red-lining, deed restrictions and other discriminatory housing and lending practices, as well as a failure to enforce proper zoning or conduct regular inspections resulting in intersecting structural inequalities that persist still;
- Limited political and economic power among certain demographic groups competing against the priorities of powerful business interests for public infrastructure spending in health, safety, open space, transportation, and other public goods resulting in disadvantaged communities having little or no say in how their neighborhoods were developed.

Working with community stakeholder and regional partners, the City of Gardena looks forward to promoting a more equitable, safe, and healthy lifestyle for all residents.

Community Engagement

The City convened a focus group of Gardena residents and conducted a city-wide online survey to gather information on resident concerns related to environmental justice. The input received was used to develop new policies contained within this EJ Element. A summary of the input received from the survey and the general themes that emerged is included as Appendix B.

Environmental Justice Element

Element Organization

This EJ Element addresses the following issue areas:

1. Reduce Pollution Exposure and Improve Air Quality
2. Promote Access to Public Facilities
3. Healthy Food Access
4. Safe and Sanitary Homes
5. Promote Physical Activity
6. Promote Civic Engagement

The Gardena General Plan addresses most of these topics within the context of other elements, especially in the Community Development Element, Housing Element, and Community Resources Element. This EJ Element serves to highlight those existing policies contained in other elements as they relate to environmental justice by duplicating them here, within the priority areas identified above. In addition, new policies are included to supplement the City's existing policy direction. New policies are included first under each priority area, followed by relevant policies from other General Plan elements along with a reference to that policy's original location. By presenting the EJ Element in this way, the City seeks to further demonstrate the deep connections between these important priorities and other City goals, priorities, programs, and objectives. As illustrated throughout this EJ Element and the General Plan more broadly, the City of Gardena values its role in promoting environmental justice for current and future residents.

Environmental Justice Element

Goals and Policies

1. Reduced Pollution Exposure and Improve Air Quality

EJ Goal 1 Reduce greenhouse gas emissions, enhance air quality, and reduce impacts associated with climate change.

Pollution exposure occurs when people come into direct contact with air, food, water, and soil contaminants and is often the result of incompatible land uses sited adjacent to each other. Sensitive populations (such as children, the elderly, and those with compromised immune systems) are the most susceptible to pollution exposure. Pollution can come from many sources including storage tanks leaking hazardous chemicals into soil and groundwater, agricultural land uses applying pesticides, mobile sources such as vehicles emitting exhaust, and stationary sources such as diesel generator exhaust.

Policies

EJ 1.1: Manage illegal dumping of trash and other items in waterways and other areas of the City.

EJ 1.2: Attract new clean industry to the City which do not emit smoke, noise, offensive odors, or harmful industrial wastes.

EJ 1.3: Require the mitigation or remediation of hazardous conditions in the City. (See also Policy LU 3.7)

EJ 1.4: Promote innovative development and design techniques, new material and construction methods to stimulate residential development that protects the environment. (See Policy DS 2.15)

EJ 1.5: Prioritize long-term sustainability for the City of Gardena, in alignment with regional and state goals, by promoting infill development, reduced reliance on single-occupancy vehicle trips, and improved multi-modal transportation networks, with the goal of reducing air pollution and greenhouse gas emissions, thereby improving the health and quality of life for residents. (See Policy CI 1.1)

EJ 1.6: Encourage citizens to report illegal dumping and vigorously prosecute illicit dumping of toxic or hazardous materials into the ground water. (See Policy CN 2.5)

EJ 1.7: Encourage and support the proper disposal of hazardous waste and waste oil. Monitor businesses that generate hazardous waste materials to ensure compliance with approved disposal procedures. (See Policy CN 2.6)

Environmental Justice Element

EJ 1.8: Ensure that the storage, processing, and transfer of hazardous materials are not located in areas that could potentially harm resident and other sensitive receptors (i.e., schools, parks, hospitals) and are adequately buffered from environmentally sensitive areas. (See Policy PS 3.1)

EJ 1.9: Encourage and support innovative technologies that treat and dispose of hazardous waste or use alternative sources to hazardous materials. (See Policy PS 3.2)

EJ 1.10: Maintain an updated inventory of businesses that handle, store, process, and transport hazardous materials/waste within the City. (See Policy PS 3.3)

EJ 1.11: Maintain planning procedures for the handling and transportation of hazardous materials and ensure that the procedures are in compliance with applicable county, state and federal regulations. (See Policy PS 3.4)

EJ 1.12: Incorporate noise considerations into land use planning decisions. (See Goal N 2)

EJ 1.13: Reduce communitywide greenhouse gas emissions locally by actively supporting regional efforts to reduce greenhouse gases (See PS Policy PS 6.11)

Environmental Justice Element

2. Promote Access to Public Facilities

EJ Goal 2 Locate public facilities and services equitably throughout the community.

The adequate provision of public facilities is a critical component to the current and future prosperity of a community. Under state law (SB 1000), “public facilities” is an umbrella term that includes “public improvements, public services, and community amenities.” This covers a wide spectrum of publicly provided uses and services including infrastructure, school facilities, parks, and transportation and emergency services. These amenities and services act to improve the health, safety, and well-being of a community by either enhancing the public sphere or providing services that are available to every resident.

Policies

EJ 2.1: Ensure that the development of parks and recreation facilities and services keep pace with development and growth within the City.

EJ 2.2: Work with the community to identify gaps in the bicycle and pedestrian network.

EJ 2.3: Explore the possibility of adding more recreation classes to meet the needs of the community.

EJ 2.4: Consider distributing City events across multiple parks as feasible.

EJ 2.5: Coordinate with the Police Department to address safety in parks.

EJ 2.6: Coordinate with partnering agencies that provide public facilities and services within the City to ensure effective, efficient, and equitable service delivery.

EJ 2.7: Work with GTrans to establish and maintain routes and services that provide the community with convenient access to jobs, shopping, schools, parks, and healthcare facilities.

EJ 2.8: Evaluate City facilities for health hazards or major sources of contamination and create a strategy to address any contamination or health hazards identified.

EJ 2.9: Provide the highest quality of public facilities possible to meet the needs of the City’s residents and businesses and promote the City’s image and cultural heritage. (See Goal LU 4)

EJ 2.10: Design public improvements to encourage pedestrian activity and access and to provide safe and convenient pedestrian circulation. (See Policy LU 4.3)

Environmental Justice Element

EJ 2.11: Provide adequate public facilities and services for the convenience and safety of each neighborhood. (See Policy LU 4.7)

EJ 2.12: Promote a safe and efficient circulation system that benefits residents and businesses and integrates with the greater Los Angeles/South Bay transportation system. (See Goal CI 1)

EJ 2.13: Promote a safe and efficient local street system that is attractive and meets the needs of the community. (See Goal CI 2)

EJ 2.14: Develop Complete Streets to promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities. (See CI Goal 3)

EJ 2.15: Provide adequate public facilities and infrastructure that support the needs of City residents and businesses. (See CI Goal 4)

EJ 2.16: Maintain and upgrade the existing parks and recreation facilities to meet the needs of all residents. (See OS Goal 1)

EJ 2.17: Increase the City's supply and quality of parkland, open space, and recreational programs. (See OS Goal 2)

EJ 2.18: Maintain a high level of fire and police protection for residents, businesses, and visitors. (See PS Goal 1)

EJ 2.19: Promote an attractive, clean, and well-maintained environment in commercial areas, especially in public meeting places, transits stops, and public buildings by providing pedestrian amenities such as attractive permanent trashcan enclosures and benches. (See Policy DS 4.4)

EJ 2.20: Promote pedestrian-friendly corridors by improving traffic and pedestrian safety and by providing pedestrian amenities such as benches and outdoor seating, potted plants, decorative paving, and detailed lighting elements along the street frontage. (See Policy DS 4.6)

Environmental Justice Element

3. Healthy Food Access

EJ Goal 3 Promote access to healthy food and nutritional choices.

Food plays a critical role in the health of a community. Therefore, it is essential that all residents have access to food that is healthy, affordable, and culturally appropriate. Disadvantaged populations may face constraints related to accessibility to nutritional food, and this lack of accessibility has a direct impact on personal health and well-being. Food access is not only associated with the physical accessibility of affordable and culturally appropriate food, but also with food security, defined as access by all people at all times to enough food for an active, healthy life. Food security includes the availability of nutritionally adequate and safe foods as well as the ability to acquire foods.

Policies

EJ 3.1 Identify vacant lots and underutilized public land that can be used for neighborhood-run community gardens including coordination with Los Angeles Unified School District.

EJ 3.2 Explore ways to expand healthy food options in the northern portion of the City.

EJ 3.3: Encourage the establishment and operation of a farmer's markets, farm stands, mobile health food markets, and Community-Supported Agriculture programs.

EJ 3.4: Expand walkable and bikeable healthy food options in areas of the City, especially DACs, with limited access to vehicles.

EJ 3.5: Ensure transportation systems link customers to grocery stores and other sources of healthy foods.

EJ 3.6: Coordinate with local markets to reduce food waste.

EJ 3.7: Implement the requirements of SB1383 to coordinate the recovery of edible food from various types of industry with organizations that distribute the food.

Environmental Justice Element

4. Safe and Sanitary Homes

EJ Goal 4 Foster healthy living conditions for people of all backgrounds and incomes.

The housing conditions of homes in a community have direct health implications for those who live in them. Lower-income or otherwise disadvantaged residents may live in dwellings built before standards and regulations were established to ensure that new homes are free from pollutants such as lead and asbestos. Older housing often has other problems such as poor ventilation, which leads to uncomfortable indoor temperatures and mold-producing moisture, as well as pest and vermin infestations.

Overcrowded housing is another issue that affects the safety and cleanliness of homes. Overcrowding is typically measured by determining the persons-per-room in a dwelling unit, with more than one person per room considered overcrowded.

Lastly, housing affordability also influences whether homes in a community are safe and sanitary. When a tenant or homeowner spends more than 30 percent of their income toward housing (including utilities), they are generally considered to be cost-burdened. When a household is cost-burdened, there is less money for housing maintenance or other needs such as healthcare and healthy food. These issues are further discussed and addressed in the City's Housing Element.

Policies

EJ 4.1: Raise awareness about the risks associated with lead-based paint and other housing hazards, including by distributing information about remediation of lead and best practices to reduce and eliminate other housing hazards.

EJ 4.2: Conduct periodic absentee owner outreach to inform owners of their legal requirements to maintain and upkeep their rental properties.

EJ 4.3: Distribute information with City newsletters or other periodic publications about protecting tenant rights so they are not penalized for reporting or living in a dwelling unit that does not meet health and safety standards.

EJ 4.4: Promote smoke-free multifamily housing properties to reduce secondhand and thirdhand smoke-related death and disability.

EJ 4.5: Encourage the upkeep, maintenance, and rehabilitation of existing housing units. (See Policy HE 1.1)

EJ 4.6: Continue to explore programs and funding sources designed to maintain and improve the existing housing stock. (See Policy HE 1.2)

Environmental Justice Element

EJ 4.7: Preserve the affordability of assisted rental projects located in the City. (See Policy HE 1.3)

EJ 4.8: Encourage room additions in the existing housing stock to alleviate overcrowding. (See Policy HE 1.4)

EJ 4.9: Promote sound housing and attractive and safe residential neighborhoods. (See Policy LU 1.1)

EJ 4.10: Protect existing residential neighborhoods from incompatible uses and development. (See Policy LU 1.2)

EJ 4.11: Encourage rehabilitation or upgrade of aging residential neighborhoods. (See Policy DS 2.6)

EJ 4.12: Incorporate quality residential amenities such as private and communal open spaces into multi-unit development projects in order to improve the quality of the project and to create more attractive and livable spaces for residents to enjoy. (See Policy DS 2.11)

Environmental Justice Element

5. Promote Physical Activity

EJ Goal 5 Encourage physical activity and improved physical fitness.

Physical activity is a large contributor to the physical and mental health of Gardena residents. Research by Centers for Disease Control and Prevention shows that physically active people tend to live longer and have lower risk for heart disease, stroke, type 2 diabetes, depression, and some cancers. Physical activity is promoted by the built environment through providing places that encourage walking, biking, and other forms of exercise. These places include parks, open space, trails, urban green spaces, areas with robust tree canopies, and active transportation networks. If a community has facilities that promote physical activity, community members are more likely to be physically active within that community.

Policies

EJ 5.1: Prioritize increasing opportunities for physical activity within DACs.

EJ 5.2: Provide neighborhood commercial centers with convenient and safe pedestrian access. (See Policy LU 2.4)

EJ 5.3: Design public improvements to encourage pedestrian activity and access and to provide safe and convenient pedestrian circulation. (See Policy LU 4.3)

EJ 5.4: Traffic-calming measures and devices (e.g., sidewalks, streetscapes, speed humps, traffic circles, cul-de-sacs and signals) should promote safe routes through neighborhoods for pedestrians. (See Policy CI 2.5)

EJ 5.5: Maintain and expand sidewalk installation and repair programs, particularly in areas where sidewalks link residential neighborhoods to local schools, parks, and shopping areas. (See Policy CI 3.3)

EJ 5.6: Maintain a citywide bicycle route and maintenance plan that promotes efficient and safe bikeways integrated with the MTA's regional bicycle system. (See Policy CI 3.4)

EJ 5.7: As roadways are repaved or otherwise improved, evaluate opportunities to enhance the quality and safety of the roadway by implementing new or improved walking, bicycling, or public transit infrastructure. If no walking, bicycling, or public transit improvements are being provided, a report to the City Council should provide an explanation for why such improvements are not needed along this roadway segment. (See Policy CI 3.5)

Environmental Justice Element

EJ 5.8: Encourage walking, biking, carpooling, use of public transit and other alternative modes of transportation to minimize vehicular use and associated traffic noise. (See Policy N 1.8)

EJ 5.9: Promote pedestrian amenities in mixed-use developments and along arterials. (See Policy DS 3.2)

EJ 5.10: Support mixed-use developments that include adequate open space areas and a full range of site amenities. (See Policy DS 3.4)

EJ 5.11: Promote pedestrian-friendly corridors by improving traffic and pedestrian safety and by providing pedestrian amenities such as benches and outdoor seating, potted plants, decorative paving, and detailed lighting elements along the street frontage. (See Policy DS 4.6)

EJ 5.12: Increase the City's supply and quality of parkland, open space, and recreational programs. (See Goal OS 2)

EJ 5.13: Encourage the conversion of utility easements and right of ways to multi-purpose parkland, trails, and bicycle routes (i.e., the Southern California Edison right-of-way between Artesia Boulevard and 178th Street, storm channel side roads, and Vermont Avenue median strips). (See Policy OS 2.3)

EJ 5.14: Expand the City's bicycle route plan and integrate the routes with other local and regional bike routes. (See Policy OS 2.5)

Environmental Justice Element

6. Promote Civic Engagement

EJ Goal 6 Support accessible and culturally appropriate opportunities for all people regardless of race, color, national origin, language, or income to engage in the decision-making process.

Civic or community engagement is an important goal across all local planning and decision-making processes. It can help foster a strong sense of place within a neighborhood and can deepen the investment of stakeholders in working toward neighborhood improvements. Environmental justice issues will be more effectively identified and resolved if accessible and culturally appropriate opportunities to engage in local decision-making are created for low-income, minority, and linguistically isolated stakeholders. Effective civic engagement not only provides the City with an opportunity to strengthen its relationship with the community but provides for sound investment in better decision-making by ensuring decisions are informed by community needs and aspirations.

Policies

EJ 6.1: Support an equitable and comprehensive approach to civic engagement and public outreach on all aspects of City governance and delivery of services.

EJ 6.2: Promote, sponsor, and support a variety of community events to strengthen social cohesion and the overall identity of the City.

EJ 6.3: Make City information such as numbers to call for code enforcement, programs offered through the City, and housing needs easily accessible.

EJ 6.4: Specifically invite residents from traditionally underrepresented demographic groups to become board, commission, and committee members as openings occur.

EJ 6.5: Coordinate with the school district, neighborhood groups, and religious institutions to distribute information and promote input opportunities.

EJ 6.6: Explore ways to provide information to older residents who don't use computers or social media through the Senior Citizens Bureau, Nakaoka Community Center, and Gardena Senior Center.

EJ 6.7: Ensure meaningful cross-cultural participation in local planning and decision-making processes by:

- Providing City-sponsored material in multiple languages.
- Organizing outreach events and conducting surveys directly to specific demographic groups.

Environmental Justice Element

- Partnering with community-based organizations that have relationships, trust, and cultural competency with target communities to conduct outreach for local initiatives and issues.

EJ 6.8: Ensure that meetings and other public engagement forums are accessible to a wide range of residents and encourage greater attendance by:

- Holding meetings at different locations and times and in different formats.
- Targeting outreach to communities that will be most impacted by an issue or decision.
- Ensuring any materials are distributed far enough in advance of meetings to allow sufficient time for review and comment.
- Using communication methods that convey complex or technical information in an easily understandable manner.
- Facilitating meetings using diverse methods that can engage all participants and can appeal to multiple styles of learning.

EJ 6.9: Utilize Channel 22 to advertise opportunities for community input.

EJ 6.10: Publish the information booklet called “Gardena Live, Work and Play” at least twice a year so residents can be aware of City events and services.

EJ 6.11: Consider establishing an Environmental Justice Committee to monitor the City’s progress on implementation of the Environmental Justice Element.



CITY OF GARDENA

Environmental Justice White Paper

Appendix A to the Environmental Justice Element

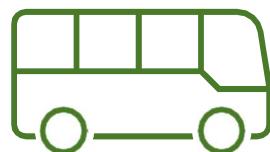
April 2021



This page is intentionally left blank.

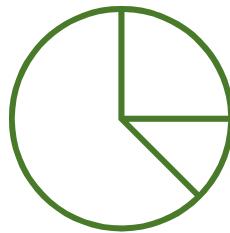
TABLE OF CONTENTS

Table of Contents	ii
A. BACKGROUND & REGULATORY FRAMEWORK	1
B. DISADVANTAGED COMMUNITIES	6
C. KEY FINDINGS & RECOMMENDED NEXT STEPS	13
D. ENVIRONMENTAL JUSTICE ISSUES	19
1. Pollution Exposure and Air Quality	19
2. Public Facilities	27
3. Food Access	33
4. Safe and Sanitary Homes	40
5. Physical Activity	45
6. Community Engagement	53
7. Improvements and Programs Addressing the Needs of DACs	63
References	73



Tables	iii
Table 1: Population Characteristics by Sensitive Population and Socioeconomic Factor Indicators	11
Table 2: Population Exposure and Air Quality	21
Table 3: Hazardous Materials and Toxics Sites	23
Table 4: Food Insecurity	35
Table 5: Car Ownership	39
Table 6: Overcrowding by Tenure	41
Table 7: Owner Occupied vs. Renter Occupied Households	42
Table 8: Gross Rent as Percentage of Household Income	43
Table 9: Monthly Owner Costs as Percentage of Household Income	44
Table 10: Housing Affordability	45
Table 11: Commuting Transportation Modes	47
Table 12: City of Gardena Parks and Recreation Facilities	50
Table 13: Resident Age	56
Table 14: Languages Spoken at Home	57
Table 15: Educational Attainment	58
Table 16: Race/Ethnicity	61
Table 17: Regional Opportunity Index (ROI) Topics and Indicators	64
Table 18: People-Based Regional Opportunity Index (ROI) DAC Census Tracts	67
Table 19: Place-Based Regional Opportunity Index (ROI) DAC Census Tracts	71

Figures	iii
Figure 1: Disadvantaged Communities	9
Figure 2: Hazardous Materials and Toxic Sites	25
Figure 3: Public Services	29
Figure 4: Community Facilities	31
Figure 5: Food Access	37
Figure 6: Park Buffers	51
Figure 7: People-Based Opportunities	65
Figure 8: Place-Based Opportunities	69



A. BACKGROUND & REGULATORY FRAMEWORK

BACKGROUND

The negative effects of environmental degradation and pollution are well-documented and include severe impacts to human health and longevity, depending on the level of exposure. Within the United States, certain communities have historically been disproportionately affected by environmental threats and the negative health impacts of environmental degradation. These communities include, but are not limited to, low-income communities, communities of color, communities comprising members of tribal nations, and immigrant communities. Increased exposure to environmental pollutants, unsafe drinking water, and contaminated facilities/structures have contributed to poorer health outcomes for these communities. Structural inequalities that disadvantage certain individuals and groups, local and regional policies, zoning, code enforcement deficiencies, and lack of community engagement and advocacy are related to disproportionate environmental and social effects. The field of environmental justice is focused on addressing these disproportionate impacts and improving the wellness of all communities by bolstering community planning efforts, considering exposure to adverse environmental effects, increasing access to amenities and services, and promoting the fair treatment of all people regardless of their race, ethnicity, national origin, or income.

REGULATORY FRAMEWORK

STATE

SENATE BILL 1000

In 2016, the Senate passed Senate Bill 1000 (SB 1000), also known as The Planning for Healthy Communities Act, amending Section 65302 of the Government Code. SB 1000 requires local California jurisdictions with disadvantaged communities to prepare and maintain an Environmental Justice element or environmental justice-related goals, policies, and implementation programs in their General Plan's other elements. SB 1000 outlines the approach to identifying disadvantaged communities (DACs), strategies to promote the protection of sensitive land uses within the state and simultaneously mandates that local jurisdictions address the needs of DACs. Through this bill, environmental justice is a mandated consideration in all local jurisdictions' land-use planning policies, regulations, and activities.

SB 1000 specifies seven topics that must be integrated into a stand-alone Environmental Justice Element or through integrated Environmental Justice goals:

1. Pollution Exposure and Air Quality
2. Public Facilities
3. Food Access
4. Safe and Sanitary Homes
5. Physical Activity
6. Community Engagement
7. Address the Needs of Disadvantaged Communities

The key findings within the City of Gardena for each of these topics are summarized in section C of this report and more detailed existing conditions are included in section D.

SENATE BILL 535

In 2012, the Legislature passed SB 535, adding Sections 39711, 39713, 39715, 39721, and 39723 to the Health and Safety Code. SB 535 directs 25% of the proceeds from the Greenhouse Gas Reduction Fund (GGRF) (established by the California Global Warming Solutions Act of 2006 AB 52's cap and trade program) to projects that provide a benefit to DACs.

ASSEMBLY BILL 1550

In 2016, the Legislature passed AB 1550, amending Section 39713 of the Health and Safety Code. AB 1550 amended SB 535 to require all GGRF investments that benefit DACs to also be located within those communities. The law also requires that an additional 10% of the funds be dedicated to low-income households and communities, of which 5% is reserved for low-income households and communities living within a half-mile of a designated DAC.

SENATE BILL 673

In 2015, the Senate passed SB 673, adding Sections 25200.21 and 25200.23 to the Health and Safety Code. SB 673 directs the Department of Toxic Substances Control (DTSC) to include criteria such as cumulative impact and neighborhood vulnerability when issuing or renewing hazardous waste facility permits. The law provides the DTSC with an opportunity to use tools such as CalEnviroScreen (CES), an Internet-based mapping tool described below that helps jurisdictions identify DACs, when making decisions on hazardous waste permitting.

ASSEMBLY BILL 523

In 2017, the Legislature passed AB 523, amending Section 25711.5 of, and to add and repeal Section 25711.6 of, the Public Resources Code. AB 523 allocates at least 25% of the Electric Program Investment Charge (EPIC) funds administered by the California Energy Commission (CEC) to support technology demonstration and deployment projects located in and benefiting “disadvantaged communities,” and dedicates at least 10% of the funds to activities located in and benefiting “low-income” communities as defined by AB 1550.

SENATE BILL 43

In 2013, the Senate passed SB 43, adding Chapter 7.6 (commencing with Section 2831) of Part 2 of Division 1 of the Public Utilities Code. SB 43 establishes the Green Tariff Shared Renewables program, administered by the California Public Utilities Commission (CPUC), which enables utility customers to meet their energy generation needs through offsite generation of renewable energy projects. The program requires 100 MW of renewable energy projects to be sited in the top 20% of CES scores based on each investor-owned utility (IOU) service territory.

ASSEMBLY BILL 2722

In 2016, legislature passed AB 2722, adding Part 4 (commencing with Section 75240) to Division 44 of the Public Resources Code. AB 2722 requires the California Strategic Growth Council to award competitive grants to specified eligible entities for the development and implementation of neighborhood-level transformative climate community plans that include greenhouse gas emissions reduction projects that provide local economic, environmental, and health benefits to DACs. AB 2722 created the Transformative Climate Communities (TCC) program administered through the California Strategic Growth Council (SGC). The TCC is a GGRF-funded program that supports innovative, comprehensive, and community-led plans

that reduce pollution and achieve multiple co-benefits at the neighborhood level.

CALIFORNIA DEPARTMENT OF TRANSPORTATION'S ACTIVE TRANSPORTATION PROGRAM (ATP)

The California Department of Transportation's (CalTrans) Active Transportation Program (ATP) aims to enhance public health and advance California's climate goals by increasing safety and mobility for non-motorized active transportation such as biking and walking. ATP projects in "disadvantaged communities" (defined as census tracts within the top 25% of CES scores along with several other options) are allocated 25% of program funds, while an additional 2% is set aside to fund active transportation planning in DACs.

LOCAL

CITY OF GARDENA GENERAL PLAN

A variety of policies contained in the existing City of Gardena General Plan support DACs and environmental justice issues through citywide improvements that provide equitable access to facilities and services, transportation network improvements, parks, and recreation opportunities, and promoting air and water quality.

Specific goals included within the General Plan that are most related to the topics of environmental justice and DACs include:

LAND USE PLAN

- POLICY LU 1.1: Promote sound housing and attractive and safe residential neighborhoods.
- POLICY LU 1.2: Protect existing sound residential neighborhoods from incompatible uses and development.
- POLICY LU 1.5: Provide adequate residential amenities such as open space, recreation, off-street parking and pedestrian features in multifamily residential developments.
- POLICY LU 2.4: Provide neighborhood commercial centers with convenient and safe pedestrian access.
- POLICY LU 3.4: Attract commercial and industrial uses that minimize adverse impacts on surrounding land uses and are economically beneficial to the City in terms of revenue generation and employment opportunities.
- POLICY LU 3.6: New commercial and industrial developments shall meet or exceed local and state requirements pertaining to noise, air, water, seismic safety and any other applicable environmental regulations.
- POLICY LU 3.7: Require the mitigation or remediation of potential hazardous conditions in the City.
- POLICY LU 4.3: Design public improvements to encourage pedestrian activity and access and to provide safe and convenient pedestrian circulation.
- POLICY LU 4.7: Provide adequate public facilities and services for the convenience and safety of each neighborhood.

ECONOMIC DEVELOPMENT PLAN

- POLICY ED 1.4: Encourage high quality mixed-use development in underutilized commercial and industrial areas where it will improve the City's tax base and image.
- POLICY ED 1.7: Encourage diversification of businesses to support the local economy and provide a stable revenue stream.
- POLICY ED 2.3: Support business revitalization funding programs to help areas experiencing blighted conditions.

- POLICY ED 2.6: Support programs that tailor services and resources to small businesses.

COMMUNITY DESIGN PLAN

- POLICY DS 2.4: Strengthen the important elements of residential streets that unify and enhance the character of the neighborhood, including pedestrian amenities, parkways, mature street trees, compatible setbacks, and unified architectural detailing and building.
- POLICY DS 2.6: Encourage rehabilitation or upgrade of aging residential neighborhoods.
- POLICY DS 2.10: Provide landscape treatments (trees, shrubs, groundcover, and grass areas) within multi-family development projects in order to create a “greener” environment for residents and those viewing from public areas.
- POLICY DS 2.11: Incorporate quality residential amenities such as private and communal open spaces into multi-unit development projects in order to improve the quality of the project and to create more attractive and livable spaces for residents to enjoy.
- POLICY DS 2.15: Promote innovative development and design techniques, new material and construction methods to stimulate residential development that protects the environment.
- POLICY DS 3.4: Support mixed-use developments that include adequate open space areas and a full range of site amenities.
- POLICY DS 4.6: Promote pedestrian-friendly corridors by improving traffic and pedestrian safety and by providing pedestrian amenities such as benches and outdoor seating, potted plants, decorative paving, and detailed lighting elements along the street frontage.

CIRCULATION PLAN

- POLICY CI 1.1: Prioritize long-term sustainability for the City of Gardena, in alignment with regional and state goals, by promoting infill development, reduced reliance on single- occupancy vehicle trips, and improved multi-modal transportation networks, with the goal of reducing air pollution and greenhouse gas emissions, thereby improving the health and quality of life for residents.
- POLICY CI Goal 3: Develop Complete Streets to promote alternative modes of transportation that are safe and efficient for commuters, and available to persons of all income levels and disabilities.
- POLICY CI Goal 4: Provide adequate public facilities and infrastructure that support the needs of City residents and businesses.

HOUSING ELEMENT

- POLICY 1.3: Preserve the affordability of assisted rental projects located in the City.
- POLICY 1.4: Encourage room additions in the existing housing stock to alleviate overcrowding.
- GOAL 2.0: Provide opportunity for increasing the supply of affordable housing within the City, with special emphasis on housing for special needs groups.
- GOAL 3.0: Minimize the impact of governmental constraints on housing construction and cost.
- GOAL 4.0: Provide adequate residential sites through appropriate land use and zoning to accommodate the City’s share of regional housing needs.
- GOAL 5.0: Promote equal opportunity for all residents to reside in the housing of their choice.

OPEN SPACE PLAN

- GOAL OS 1: Maintain and upgrade the existing parks and recreation facilities to meet the needs of all residents.
- GOAL OS 2: Increase the City's supply and quality of parkland, open space, and recreational programs.

CONSERVATION PLAN

- GOAL CN 2: Conserve and protect groundwater supply and water resources.
- GOAL CN 3: Reduce the amount of solid waste produced in Gardena.
- GOAL CN 4: Conserve energy resources through the use of technology and conservation methods.
- GOAL CN 5: Protect the City's cultural resources.

PUBLIC SAFETY PLAN

- GOAL PS 1: Maintain a high level of fire and police protection for residents, businesses and visitors.
- GOAL PS 2: Protect the community from dangers associated with geologic instability, seismic hazards and other natural hazards.
- GOAL PS 3: Protect public health, safety and the environment from exposure to hazardous materials and other dangers.
- GOAL PS 4: Increase public awareness of crime and fire prevention, and emergency preparedness and procedures.

NOISE PLAN

- GOAL N 1: Use noise control measures to reduce the impact from transportation noise sources.
- POLICY N 1.8: Encourage walking, biking, carpooling, use of public transit and other alternative modes of transportation to minimize vehicular use and associated traffic noise.
- GOAL N 2: Incorporate noise considerations into land use planning decisions.
- GOAL N 3: Develop measures to control non-transportation noise impacts.

B. DISADVANTAGED COMMUNITIES

The term ‘disadvantaged community’ is a broad designation that includes any community disproportionately affected by environmental, health, and other burdens or low-income areas disproportionately affected by environmental pollution and other hazards. In relation to environmental justice, DACs are typically those communities that disproportionately face the burdens of environmental hazards. Government Code Section 65302, as amended by SB 1000, defines a DAC as follows:

“...an area identified by the California Environmental Protection Agency (CalEPA) pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.”

In February 2017, the Office of Environmental Health Hazard Assessment (OEHHA), on behalf of the California Environmental Protection Agency (CalEPA), released Version 3.0 of the California Communities Environmental Health Screening Tool (CES). CalEnviroScreen identifies communities that are disproportionately affected by environmental hazards. It is a science-based tool that uses existing environmental, health, and socioeconomic data to rank all census tracts in California with a CES score. CalEPA designates the tracts with a CES score in the top 25 percentile as DACs. In June 2018, OEHHA updated CalEnviroScreen 3.0 to address a minor flaw in the software program algorithm used to calculate overall census tract scores. Additionally, on February 22, 2021, OEHHA released the draft CalEnviroScreen 4.0 for public comment. Since it is still in draft form, the results of Version 3.0 are used in this analysis.

Although the scores and DAC status of specific census tracts may change over time (for example, as CalEnviroScreen is periodically updated), the goals, policies, and programs identified in the Environmental Justice element generally apply citywide. Therefore, while certain census tracts may shift in their identification as a DAC, the City's commitment to promoting environmental justice throughout the community remains.

Based on CalEnviroScreen 3.0, 10 out of 14 census tracts within the City have a CES score in the top 25 percentile, as illustrated in Figure 1, qualifying them as a DAC. Low-income communities disproportionately affected by environmental concerns are also considered an “environmental justice community”. These communities can be identified using the California Air Resources Board (CARB) Priority Populations Mapping Tool, which identifies low-income communities located within $\frac{1}{2}$ mile of a CalEPA-identified disadvantaged community. Based on this assessment, three more census tracts (beyond the 10 identified via CalEnviroScreen 3.0) can be considered disadvantaged and are also shown in Figure 1.

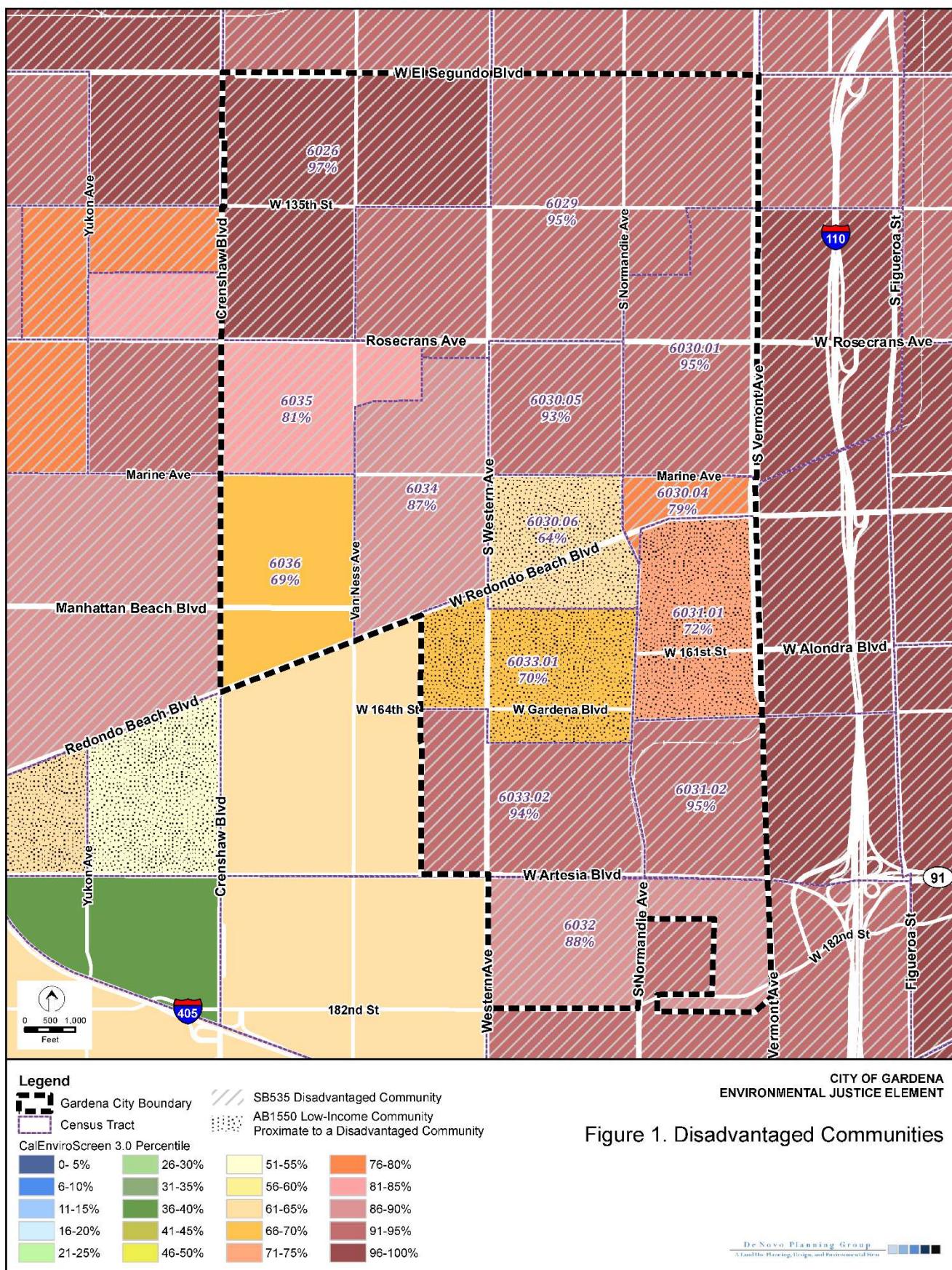
Based on the methodology outlined above, as of mid-2021 the City of Gardena includes **13 census tracts (out of 14) that are considered disadvantaged communities**. These areas represent approximately 93.9% of the City acreage, 92.9% of the City’s population, and 93.4% of the City’s households.

To understand the existing health and socioeconomic conditions of each DAC, Table 1 lists the percentiles for sensitive population and socioeconomic factor indicators in the City by census tract. The 13 DAC census tracts are outlined with bold lines. The sensitive population indicators reflect the communities' health and the socioeconomic factor indicators describe educational attainment, income level, employment, and housing conditions and burden. For each indicator, scores of 75% or higher represent a high burden on the population. All 13 DAC tracts are highly burdened in at least two indicators and have medium or high burdens in six or more of the eight indicators.



This page is intentionally left blank.

FIGURE 1: DISADVANTAGED COMMUNITIES



This page is intentionally left blank.

TABLE 1: POPULATION CHARACTERISTICS BY SENSITIVE POPULATION AND SOCIOECONOMIC FACTOR INDICATORS

INDICATOR (%)	CENSUS TRACTS														
	6026	6029	6030.01	6030.04	6030.05	6030.06	6031.01	6031.02	6032	6033.01	6033.02	6034	6035	6036	
SENSITIVE POPULATION INDICATORS															
Asthma	88	74	85	85	81	85	85	73	77	80	76	81	91	85	
Low Birth Weight	95	35	73	71	90	32	46	81	66	35	83	88	67	58	
Cardiovascular Disease	78	49	75	75	67	75	75	54	77	66	57	63	85	72	
SOCIOECONOMIC FACTOR INDICATORS															
Education	47	77	72	53	69	44	47	56	58	35	65	54	66	52	
Linguistic Isolation	16	88	77	90	72	60	61	87	86	88	81	54	79	62	
Poverty	55	79	73	58	71	65	59	68	26	53	71	61	35	44	
Unemployment	76	74	55	13	58	65	40	57	19	16	84	57	4	43	
Housing Burden	70	58	90	61	96	66	76	74	6	78	72	50	18	34	
Total Population Characteristics Score	95	99	92	74	88	68	69	78	59	60	85	75	66	64	
CES 3.0 Score	97	95	95	79	93	64	72	95	88	70	94	87	81	69	
Color Key					High Burden: 75.0 – 100.0%			Medium Burden: 25.0 – 74.9%			Low Burden: 0.0 – 24.9%				

Source: California Office of Environmental Health Hazard Assessment, CalEnviroScreen 3.0

Note: DAC census tracts are outlined in bold

This page is intentionally left blank.

C. KEY FINDINGS & RECOMMENDED NEXT STEPS

The key findings for the seven required Environmental Justice topics are summarized below with recommended next steps. More detail on existing conditions is included in section D of this report.

1. POLLUTION EXPOSURE AND AIR QUALITY

Key Findings:

The various forms and sources of air and water pollution and hazardous waste often disproportionately affect DACs. This is typically due to the existence and relative concentration of pollution-emitting sources close to the communities. There are 12 CESpollution indicators. All census tracts (regardless of their status as a DAC or not) have medium or high burdens in at least seven out of the 12 indicators, including high burdens in particulate matter 2.5 and toxic releases and medium or high burdens in ozone, diesel particulate matter, traffic, and drinking water.

There are 38 hazardous waste sites in Gardena that are generally clustered in the northern portion of the City, predominately occupying locations within one DAC tract. This DAC is home to more than half of the City's hazardous waste sites, and all 38 sites are within DACs.

Next Steps:

- Evaluate sources of pollution with medium and high burdens, especially in DACs.
- Recognize that more than half of the City's hazardous waste sites are primarily within one DAC and create policies to address unique issues related to these sites.

2. PUBLIC FACILITIES

Key Findings:

Access and availability of public facilities is an aspect of the built environment that may disproportionately limit the opportunities of DACs. The City has two fire stations, one police station, and five medical centers within its boundaries. The police station and both fire stations are located within DACs. Most of the medical centers are located near the City center and are all within DACs. Several bus lines provide citywide service. Two Metro stations are just outside of the City's eastern boundary in unincorporated Los Angeles County.

City Hall is in a DAC within the southcentral portion of the City on W. 162nd St. just east of S. Western Ave. There is one library (the Mayme Dear Library) within City boundaries next to City Hall and one more just outside of the western border on Crenshaw Blvd. in unincorporated Los Angeles County. Seven out of the City's 11 parks and recreation facilities are evenly distributed in DACs throughout the community, though there are six DACs notably void of parks and other community facilities. Daycares are distributed mostly throughout the southern portion of the City although there is one north of Rosecrans Ave.

Next Steps:

- Evaluate opportunities to address areas of the City, especially DACs, which have limited access to park or open space facilities.

3. FOOD ACCESS

Key Findings:

Feeding America, the nation's largest domestic hunger-relief organization, has released a report entitled *Map the Meal Gap* for ten consecutive years to offer insights on how food insecurity and food costs vary at the county and congressional district level. Most census tracts in Gardena (11) are within the 43rd Congressional District and three census tracts are within the 44th Congressional District. The food insecurity rate in the 43rd District is 11.6%, which is generally consistent with County (11.4%), State (10.8%), and national (11.5%) rates. The food insecurity rate in the 44th District is 12.9%, which is notably higher than the 43rd District, County, and State.

Five supermarkets, 18 specialty food stores, and nine convenience stores lie within City boundaries. There are no supermarkets within City boundaries north of Marine Ave. The specialty food stores, and convenience stores are fairly well distributed throughout the City, however, there are more in the southern half.

The lack of proximate grocery stores has the greatest affect in locations where residences do not own vehicles or have sufficient access to transit. All census tracts have at least some households without access to a vehicle. Five census tracts have a higher rate of "no vehicle access" than the citywide rate of 6.8%. Three DAC tracts (located in the northeastern portion of the City) have double or nearly double the rate of no vehicle access as the City overall.

Next Steps:

- Explore ways to expand healthy eating options in the northern portion of the City.
- Expand walkable/bikeable healthy food options in census tracts, especially DACs, with higher rates of "no vehicle access" or limited vehicle access.

4. SAFE AND SANITARY HOMES

Key Findings:

The condition of the housing stock in a DAC may have negative impacts on the well-being of its residents. Housing conditions are considered "substandard" when conditions are found to be below the minimum standard of living conditions defined in the California Health and Safety Code. In addition to structural deficiencies and standards, the lack of infrastructure and utilities often serves as an indicator for substandard conditions. While most homes have access to basic facilities like bathrooms and kitchens, 0.7% of the occupied housing units in Gardena lack complete plumbing facilities, and 2.5% lack complete kitchen facilities. About 1.4% of the units have no telephone service available.

Overcrowding within a housing unit is a primary cause of unsafe housing conditions. The City has a lower overcrowding rate (9.7%) than the County (11.3%). Seven DAC census tracts experienced overcrowding at a higher rate than at the citywide rate. Two DAC tracts on the east side have the highest overcrowding rates.

The City has a slightly lower rate of renter-occupied housing units (52.1%) than the County (54.2%). The City has a slightly higher percentage of renter-occupied cost burdened households (58.8%) than the County (57.6%). Four DAC census tracts experienced rental cost

burden at a higher rate than at the citywide rate. Two DAC tracts, one in the northwest area and the other in the central area, have the highest rental cost burden. It is also notable that more than half of renters within six DAC census tracts spend 35% or more of their income on housing. A higher percentage of renter-occupied units are in the low to extremely low-income levels (72.2% combined) compared to owner-occupied units (44.7% combined), demonstrating a higher housing cost burden for renters.

The City has a higher percentage of owner-occupied cost burdened households (69.8%) than the County (43.5%). No individual census tracts experienced ownership cost burden at a higher rate than at the citywide rate. More than half of homeowners in one DAC census tract in the eastern area spend 35% or more of their income on housing.

Next Steps:

- Prioritize the safety and sanitation of housing stock to create proper living conditions for all residents, especially those living in DACs.
- Explore policies to alleviate substandard and overcrowding conditions in identified DACs.
- Consider programs to expand homeownership and help reduce the number of cost burdened households.

5. PHYSICAL ACTIVITY

Key Findings:

Residents of DACs are often more likely to experience negative health outcomes. The built environment in DACs can often be limited by land use planning and lack of investment, leaving less opportunities for formal and informal physical activity. Data about active transportation use during daily commutes is one indicator of physical activity levels. Active transportation modes include walking and biking, while powered transportation modes include driving alone, carpooling, public transit, and taxicab, motorcycle, or other means.

Overall, the City of Gardena uses active transportation modes slightly less (3.1%) than the County (3.5%). Only 2.6% of Gardena commuters reported walking to work and 0.5% reported riding a bike to work. Most Gardena commuters drove to work alone (83.4%). Six DAC tracts have higher rates of commuters who walk and/or bike to work than both the City and County overall. These tracts have a mixture of rates for households with no vehicle access.

As previously mentioned, seven out of the City's 11 parks and recreation facilities are evenly distributed in DACs throughout the community, though there are six DACs notably void of parks and other community facilities. All census tracts in Gardena are within the $\frac{1}{4}$ -mile or $\frac{1}{2}$ - mile buffer areas of multiple parks located either within or adjacent to the City.

Next Steps:

- Prioritize increasing opportunities for physical activity within DACs.
- Explore the reasons why some DAC tracts have higher rates of commuters who walk and/or bike to work and if there are actions that can be implemented in other DACs to increase their rates.
- Look into opportunities to increase the number of parks within DACs that do not have any.

6. COMMUNITY ENGAGEMENT

Key Findings:

An important aspect of planning for environmental justice is the development of effective policies and programs that enable all residents to participate in local decision making. DACs can often be excluded from decision-making when officials and policies do not focus on involving these communities in a strategic manner. Section D of this report outlines the recommended approach to community engagement in development of the Environmental Justice Element.

It is important to start with a baseline analysis of a community's existing level of civic engagement to estimate how likely residents are to participate. The primary means of measuring a community's level of civic engagement is the assessment of voter participation. Both the voter registration rate and voter turnout rate for Gardena were lower than the County for the 2020 presidential election. Certain demographic categories can also help predict a community's likely level of civic engagement.

Age distribution can help predict the likelihood of a community participating in civic activities and identify constraints associated with engaging different members of the community. Gardena's residents are somewhat older than the County as a whole. Only two DAC tracts are younger than the County as a whole, while the remaining DAC tracts are older than the County as a whole. The City's only tract that does not qualify as a DAC is older compared to the County.

Language is a critical signifier of a population's likely participation in civic activities. Non-native English speakers, and especially those individuals with limited English fluency, are less likely to participate in civic activities. The majority of households in Gardena speak a language other than English. More than half of households in 12 census tracts speak a language other than English, and the most common language spoken is Spanish, followed by various Asian and Pacific Islander languages.

Educational attainment is a strong signifier of a population's likely participation in civic activities. Higher educational attainment generally correlates with increased civic participation. More of Gardena's residents and the census tracts' populations have a high school diploma or equivalent and at least some college or an Associate's degree than on the countywide level. Only three census tracts have a higher percentage of residents with a Bachelor's degree or higher than the County, however. Within DACs, residents who did not complete high school or only obtained a high school degree are of greatest concern. There is one DAC in the northwestern portion of the City where the highest percentage of residents have less than a high school education.

Race and ethnicity are important predictors of civic engagement, and numerous studies have shown that whites are more likely to be civically engaged than other groups. Additionally, it is essential to consider the racial make-up of a community when evaluating environmental justice because race is known to correlate with disproportionate environmental burdens. The majority race in the City of Gardena is almost evenly split between Asian and White. The Asian population is higher in the City than the County, while the White population is lower in the City than the County. A smaller percentage of the City is Hispanic or Latino than the County,

although one DAC tract in the northwestern portion of the City has a notably higher percentage than both the City and County overall. There is a larger Black or African American population in the City than in the County, and two DACs (one in the northwest area and one in the east) are majority Black or African American. Two DACs are majority some other race.

Next Steps:

- Prioritize engaging DACs in the development of environmental justice plans and programs.
- Focus on methods to effectively engage older residents.
- Identify ways to engage members of the community who do not speak English.
- Tailor activities and the venues where they take place to accommodate the cultural preferences of different racial/ethnic groups.

7. ADDRESS THE NEEDS OF DISADVANTAGED COMMUNITIES

Key Findings:

An integral component of Environmental Justice planning is proactively prioritizing projects and investments that directly benefit DACs. These communities may have specific needs that are distinct from those of the greater community, which may require taking special actions to help improve existing conditions in DACs.

The UC Davis Center for Regional Change and Rabobank, N.A. partnered to develop the Regional Opportunity Index (ROI) intended to help understand social and economic opportunity in California's communities. The goal of the ROI is to help target resources and policies toward people and places with the greatest need to foster thriving communities. The tool analyzes different indicators within six topics including civic life, health/environment, mobility/transportation, housing, economy, and education. There are two types of indicators: people-based and place-based. The specific indicators are discussed in more detail in Section D of this report.

The tool ranks each census tract in terms of highest opportunity to lowest opportunity levels. Highest opportunity tracts indicate that conditions are good across the indicators, while lowest opportunity tracts indicate that improvements need to be made. Gardena has mostly lower- or average-opportunity census tracts throughout the City, with people-based opportunities generally scoring better than place-based opportunities. It will be important for the City to consider the lower opportunity ROI topics and indicators within DAC census tracts when reviewing and establishing policies and programs and directing investments.

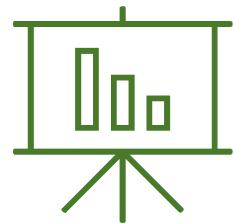
In terms of **people-based** assets, there are eight DAC census tracts, mostly located east of S. Western Ave., with lower levels of opportunity. Civic life (comprised of English speakers and voting rates) and housing (comprised of housing cost burden and homeownership) are the two most common recurring topics among lower-opportunity tracts.

In terms of **place-based** assets, there are four DAC census tracts, mostly located north of Marine Ave., with lower levels of opportunity. Housing (comprised of housing affordability

and housing adequacy) and economy (comprised of bank accessibility, job quality, job growth, and job availability) are two most common recurring topics among lower-opportunity tracts.

Next Steps:

- Consider the ROI topics and indicators within identified DAC census tracts when reviewing and establishing policies and programs.
- Prioritize identified DACs for public investments, public services, and/or increased environmental protections.



D. ENVIRONMENTAL JUSTICE ISSUES

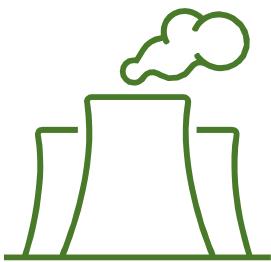
This section includes baseline conditions for the seven topics required to be addressed within the City's General Plan in accordance with Senate Bill 1000.

1. POLLUTION EXPOSURE AND AIR QUALITY

The various forms and sources of air and water pollution and hazardous waste often disproportionately affect DACs. This is typically due to the existence and relative concentration of pollution-emitting sources within close proximity to the communities. Disproportionate exposure to pollutants is linked to variety of negative health impacts, including but not limited to, asthma, cardiovascular diseases, cancer, and other potentially fatal conditions. There are 12 CES pollution indicators, and the percentile of pollution burden for each census tract are listed in Table 2.

Scores of 75% or higher represent a high pollution burden. All census tracts (regardless of their status as a DAC or not) have medium or high burdens in at least seven out of the 12 indicators, including high burdens in particulate matter 2.5 and toxic releases and medium or high burdens in ozone, diesel particulate matter, traffic, and drinking water.

Several census tracts have values of zero (0) for some of the exposure and environmental effects indicators. This typically implies that monitoring or reporting was conducted, but no impacts were present. For many exposure and environmental effects indicators, this means that no facilities or sites were located within 1000 meters of a populated area of the tract. Values of zero are not included in the percentile calculation, which would give the false impression that an impact is present.



This page is intentionally left blank.

TABLE 2: POPULATION EXPOSURE AND AIR QUALITY

INDICATOR (%)	CENSUS TRACTS														
	6026	6029	6030.01	6030.04	6030.05	6030.06	6031.01	6031.02	6032	6033.01	6033.02	6034	6035	6036	
EXPOSURE INDICATORS															
Ozone	40	40	40	40	40	40	40	40	32	40	40	40	40	40	40
Particulate Matter 2.5	82	82	82	82	82	82	82	82	82	82	82	82	82	82	82
Diesel Particulate Matter	72	76	81	81	72	70	81	81	75	69	69	70	72	69	
Pesticides	51	64	59	0	22	0	0	33	10	0	0	0	11	0	
Toxic Releases	80	81	84	87	85	88	89	92	95	90	94	86	82	87	
Traffic	59	62	48	58	72	71	52	63	57	69	62	65	64	68	
Drinking Water	38	31	31	26	26	26	26	49	52	31	30	26	26	30	
ENVIRONMENTAL EFFECTS INDICATORS															
Cleanup Sites	97	94	54	42	42	2	50	78	91	42	96	42	42	0	
Groundwater Threats	99	95	78	52	75	32	45	75	92	15	82	80	89	43	
Hazardous Waste	91	88	70	50	66	19	19	47	82	43	18	70	67	51	
Impaired Waters	72	72	0	0	0	0	0	98	98	72	98	72	72	72	
Solid Waste	86	95	93	74	85	24	62	58	83	24	70	59	33	0	
Total Population Characteristics Score	99	99	92	73	85	47	64	97	98	71	92	86	85	64	
CES 3.0 Score	97	95	95	79	93	64	72	95	88	70	94	87	81	69	

Color Key		High Burden: 75.0 – 100.0%		Medium Burden: 25.0 – 74.9%		Low Burden: 0.0 – 24.9%
------------------	--	-------------------------------	--	--------------------------------	--	----------------------------

Source: California Office of Environmental Health Hazard Assessment, CalEnviroScreen 3.0

Note: DAC census tracts are outlined in bold

This page is intentionally left blank.

HAZARDOUS MATERIALS AND TOXICS

There are 38 hazardous waste sites in the City of Gardena that are currently under evaluation or amid cleanup, as detailed in Table 3. These sites are generally clustered in the northern portion of the City, predominately occupying locations within DAC tract 6029. This DAC is home to more than half of the City's hazardous waste sites (20 sites). This portion of the City is predominately industrial, and 18 sites are within industrial land use areas. All 38 sites are within DACs and predominately industrial areas, as illustrated in Figure 2.

TABLE 3: HAZARDOUS MATERIALS AND TOXICS SITES

NAME	PROJECT TYPE/ ACTIVITY	ADDRESS	CENSUS TRACT
ENVIROSTOR SITES¹			
Gardena Plating Co., Inc.	Tiered Permit	12901 S. Western Avenue	6026
Los Angeles Air Force Base	State Response	2400 El Segundo Boulevard	6026
Northrop Corporation Electronics Div.	Corrective Action	13215 S. Western Avenue	6026
Aerodynamic Plating Co., Inc. #3	Tiered Permit	13629 Saint Andrews Place	6029
Angelus Plating	Tiered Permit/ Evaluation	1713 W. 134th Street	6029
Azon Corp.	Evaluation	13771 S. Gramercy Place	6029
Chromalloy Los Angeles	Tiered Permit	2100 W. 139th Street	6029
Electronic Plating Company	Evaluation	13021 S. Budlong Avenue	6029
Hawthorne Printing	Evaluation	2140 1/2 139th Street	6029
Kb Gardena Building LLC	Voluntary Cleanup	13720 S. Western Avenue	6029
Mayan Patel (Connector Service Corp.)	Tiered Permit	13021 Budlong Avenue	6029
PB Fasteners, Division Of Paul R. Briles, Inc.	Tiered Permit	1700 W. 132nd Street	6029
Rosecrans Place	Voluntary Cleanup	2101 And 2129 W. Rosecrans Avenue	6029
Sonic Industries (Former)	Evaluation	13200 S. Western Avenue	6029
Sonic Plating Co., Inc. - Gardena	State Response	1930 W. Rosecrans Avenue	6029
Gardena (141st & Normandie)	Voluntary Cleanup	1335 - 1343 W. 141st Street	6030.01
Pearman & Son Ready Concrete Mix	Evaluation	14100 S. Normandie Avenue	6030.01
Normandie Estate	Voluntary Cleanup	16908 S. Normandie Avenue	6031.02
Gardena Sumps	State Response	1450 W. Artesia Boulevard	6032
Globe Illumination Company (Former)	Evaluation	1515 W. 178th Street	6032
Sonken-Galamba Corp	Evaluation	1439 W. 178th Street	6032
Ace Trailer Park Site/Honeywell	Voluntary Cleanup	17024 S. Western Avenue	6033.02
Gardena Marketplace	Voluntary Cleanup	1735, 1711, 1741 1701 And 1691 W. Artesia Boulevard	6033.02
Iri Dover	Tiered Permit	1859 W. 169 Street	6033.02
Control Plating Co., Inc.	Tiered Permit	17014 Gramercy Place	6034
2403 Marine Avenue	State Response	2403 Marine Avenue	6035

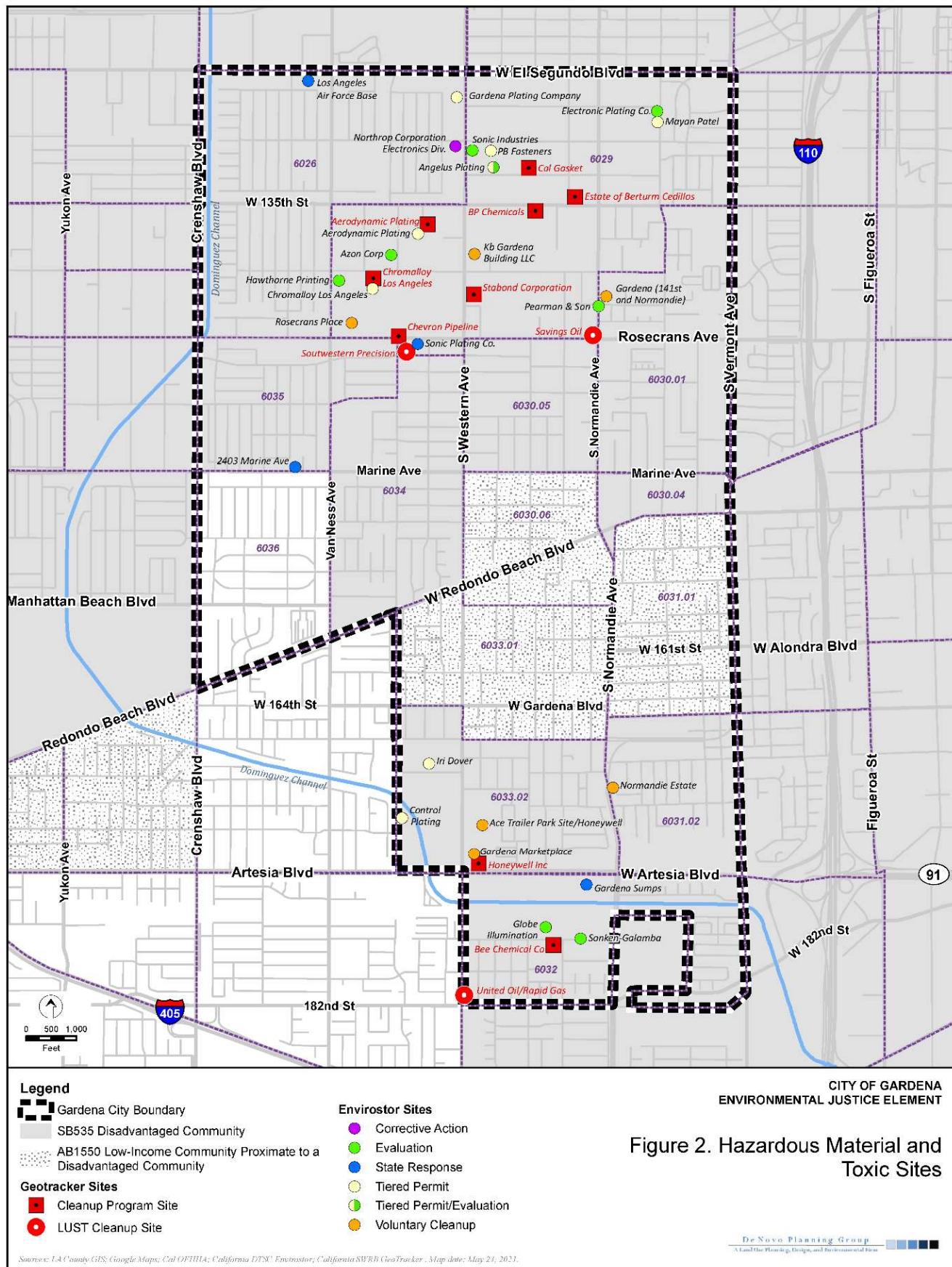
NAME	PROJECT TYPE/ ACTIVITY	ADDRESS	CENSUS TRACT
GEOTRACKER CLEANUP PROGRAM SITES²			
Aerodynamic Plating Company	Site Assessment	13620-13629 S. Saint Andrews Place	6029
BP Chemicals (Hitco)	Remediation	1600 W. 135th Street	6029
Cal Gasket	Open - Inactive	1601-1613 W. 134th Street	6029
Chevron Pipeline	Site Assessment	2001 W. Rosecrans Avenue	6029
Chromalloy Los Angeles	Verification Monitoring - Land Use Restrictions	2100 139th St W	6029
Estate of Bertrum Cedillos	Open - Inactive	13438 Halldale Avenue	6029
Stabond Corporation	Open - Inactive	14010 Western Avenue	6029
Bee Chemical Co (Former)	Assessment & Interim Remedial Action	1500 178th St W	6032
Honeywell Inc.	Remediation	17300 Western Avenue	6032
LUST CLEANUP SITES²			
Savings Oil Co.	Site Assessment	1401 Rosecrans W	6029
United Oil #44/Rapid Gas #44	Remediation	18130 Western Avenue S	6032
Southwestern Precision Co.	Assessment & Interim Remedial Action	1939 144th Street	6035

1: Source: California Department of Toxic Substances Control, Envirostor Database, 2021.

2: Source: California Water Resources Control Board Geotracker Database, 2021.

Note: DACs are in bold text.

FIGURE 2: HAZARDOUS MATERIALS AND TOXIC SITES



This page is intentionally left blank.

2. PUBLIC FACILITIES

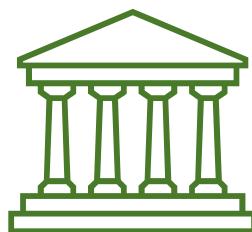
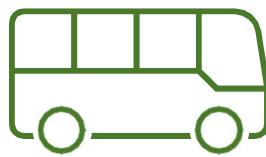
Access and availability of public facilities is an aspect of the built environment that may disproportionately limit the opportunities of DACs. If DACs have unequal access to public facilities, or if a city does not provide adequate facilities for public use, DACs may be limited in their ability to access necessary key resources. Limited access to resources as a result of inadequate public facilities can lead to reduced lifespan, poorer health outcomes, and diminished mental well-being. The adequate planning of parks and transportation infrastructure can help provide equal access to resources for all communities within a city. The location of public services and community facilities within and adjacent to the City of Gardena and with relationship to DACs are illustrated in Figures 3 and 4, respectively. The distribution of these facilities is summarized below.

PUBLIC SERVICES

The location of transit stations and routes, medical centers, and emergency services and public safety facilities are shown in Figure 3. The City has two fire stations, one police station, and five medical centers within its boundaries. Fire station 159 is within DAC tract 6029. The police station and fire station 158 are located in the southcentral portion of the City within DAC tract 6033.01. Most of the medical centers are located near the City center and are all within DACs. Several bus lines provide citywide service. Two Metro stations are just outside of the City's eastern boundary in unincorporated Los Angeles County.

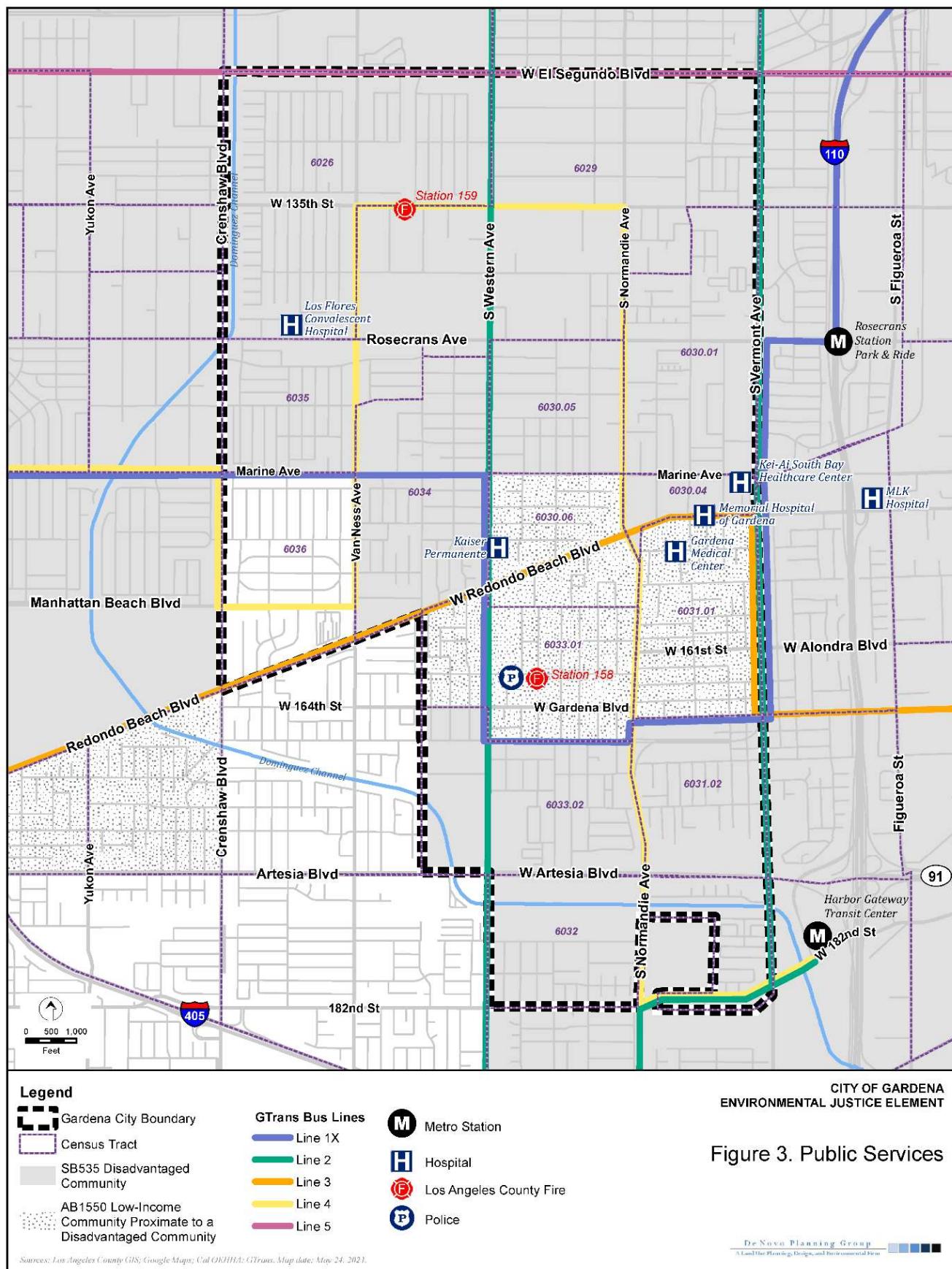
COMMUNITY FACILITIES

The location of City and County government buildings, parks, daycare centers, and libraries are shown in Figure 4. City Hall is located in the southcentral portion of the City in DAC tract 6033.01 at 1700 W. 162nd St., just east of Western Ave. Seven out of the City's 10 parks and recreation facilities are distributed in DACs throughout the community, though there are six DACs notably void of parks and other community facilities, including tracts 6029, 6030.01, 6030.04, 6033.02, 6032, and 6031.01. There is one County library (the Mayme Dear Library) within City boundaries next to City Hall in DAC tract 6033.01 and one more just outside of the western border on Crenshaw Blvd. in unincorporated Los Angeles County. Daycares are fairly evenly distributed mostly throughout the southern portion of the City although there is one north of Rosecrans Ave.



This page is intentionally left blank.

FIGURE 3: PUBLIC SERVICES



This page is intentionally left blank.