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Appendix E: Fair Housing Assessment

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, concentrations 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 (with population over 50,000) or participating jurisdictions (population under 50,000) through a county program to receive HUD Community Planning and Development (CPD) funds from HUD. Before the 2016 federal rule was repealed in 2019, jurisdictions receiving CPD funds were required to prepare an Assessment of Fair Housing (AFH) or Analysis of Impediments to Fair Housing Choice (AI).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 relies on the following data sources: California Department of Housing and Community Development (HCD) 2021 Affirmatively Furthering Fair Housing (AFFH) Data Viewer, 2018 Los Angeles County Analysis of Impediments to Fair Housing Choice (2020 AI), U.S. Department of Housing and Urban Development (HUD) 2021 AFFH Data, 2015-2019 American Community Survey (ACS) (5-Year Estimates), and HUD Comprehensive Housing Affordability Strategy (CHAS) Data based on the 2013-2017 ACS, among others.

This analysis also considered input from City staff and the community. During engagement events, City staff and community members discussed how multifamily housing historically was concentrated in neighborhoods with low-income residents. Community members discussed the relationship between income and race and ethnicity, noting that this concentration of housing by income historically impacted communities of color. To counter this, some community members advocated for equitably distributing housing throughout the city, also noting the environmental justice benefits of doing so. However, those in the community who wanted to concentrate multifamily housing outside of single family neighborhoods and along transportation corridors discussed the existing racial diversity they saw in their single family neighborhoods. These community members also questioned whether distributing more housing in single family neighborhoods would be

financially feasible and advance the Housing Element's RHNA goals. Some noted this distribution approach would increase displacement.

For the purpose of HUD CPD funds (CDBG, HOME, and ESG)¹, the Los Angeles County Development Authority (LACDA) functions as the lead agency to receive these funds on behalf of 48 small cities (with population less than 50,000), including Culver City, and the unincorporated County areas. Collectively, this geography is known as the Urban County. Much of the data provided by HUD for AFFH analysis is based on this collective Urban County geography.

Assessment of Fair Housing Issues

Fair Housing Enforcement and Outreach

The Los Angeles County CDBG Urban County program contracts with the Housing Rights Center (HRC) for fair housing services. HRC contract does not include providing fair housing records for individual jurisdictions participating in the Urban County program.

In FY 2019-2020, HRC received 2,038 calls for general housing inquiries and 356 calls related to fair housing inquiries. Among the 356 inquires, fair housing issues relating to disabilities (physical and mental) represented the majority (82%) of the protected classifications. Trailing distantly behind was source of income at 5% of the inquiries.

During FY 2019-2020, 83 housing discrimination cases were opened, the majority were reconciled or withdrawn. Two cases were referred to litigation and three cases were referred to the Department of Fair Employment and Housing (DFEH). Among the 83 cases opened, physical disability (47%), mental disability (22%), and source of income (19%) represented the majority of the protected classes.

Annually, HRC conducts outreach and education throughout the Los Angeles Urban County. Typical activities include Public Service Announcements/media/advertisements; community presentations; literature distribution; and management trainings.

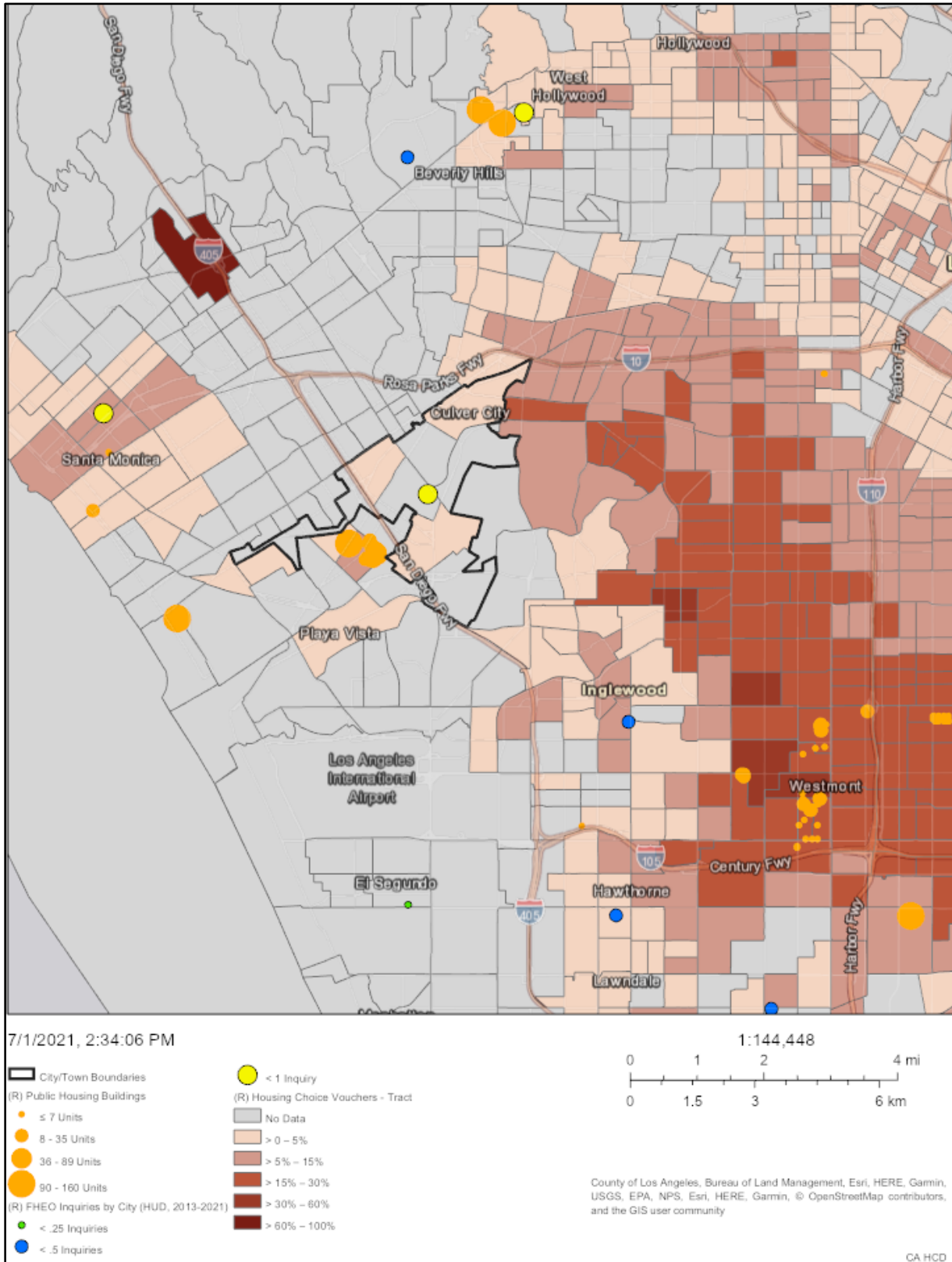
For federally funded Urban County programs, the County has committed to complying with the Fair Housing Act, Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq., by ensuring that housing is available to all persons without regard to race, color, religion, national origin, disability, familial status (having children under age 18), or sex. LACDA prohibits discrimination in any aspect of housing on the basis of race, color, religion, national origin, disability, familial status, or sex. Furthermore, HRC under contract with LACDA, monitors fair housing compliance for both state and federal fair housing laws.

Figure E- 1 shows public housing buildings, HUD Office of Fair Housing and Equal Opportunity inquiries (FHEO), and housing choice vouchers (HCV) for Culver City and the surrounding areas. There are no public housing buildings in Culver City. Between January 2013 and March 2021, HUD received 26 FHEO inquiries from Culver City residents; four related to disability, one related to race, three related to familial status, two related to sex,

¹Community Development Block Grants (CDBG); HOME investment Partnership (HOME); and Emergency Solutions Grants (ESG).

and 16 general inquiries. Less than 5% of renters in three Culver City tracts are receiving Housing Choice Vouchers (HCVs). To protect the confidentiality of those receiving HCV Program assistance, tracts containing 10 or fewer voucher holders have been omitted from this data set.

Figure E- 1: Public Housing Building, FHEO Inquiries, and HCVS



Source: HCD AFFH Data Viewer (HUD 2020 Public Housing Program data, HUD FHEO 2013-2021 data, HUD 2020 HCV data), 2021.

Integration and Segregation

Race and Ethnicity

HUD tracks racial or ethnic dissimilarity² trends for Urban County programs. Dissimilarity indices show the extent of distribution between two groups, in this case racial/ethnic groups, across census tracts. The following shows how HUD views various levels of the index:

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

HUD only records AFFH data, including dissimilarity indices for jurisdictions receiving CDBG funds. Culver City is part of the County CDBG program, collectively known as the Urban County. Because the HUD index is not available for Culver City alone, dissimilarity indices for the City were calculated using 2000 Census, 2010 Census, and 2015-2019 ACS block group demographics estimates. This section also includes an analysis of racial/ethnic minority trends geographically and over time using the 2021 HCD AFFH Data Viewer and ACS estimates.

Regional Trend. Dissimilarity indices for the Los Angeles Urban County and Los Angeles County region from 1990 to 2020 are shown in Table E- 1. Dissimilarity between non-White and White communities in the Los Angeles Urban County and throughout the Los Angeles County region has worsened since 1990. For both Los Angeles Urban County jurisdictions and the entire County, dissimilarity between Black and White communities has improved slightly, while dissimilarity between Hispanic/White and Asian or Pacific Islander/White communities has worsened. Based on HUD's index, segregation between Asian or Pacific Islander/White in the Los Angeles Urban County communities is moderate, while segregation between non-White/White, Black/White, and Hispanic/White Los Angeles Urban County communities is high.

Table E- 1: Racial/Ethnic Dissimilarity Trends - Urban County and Los Angeles County

Racial/Ethnic Group	1990	2000	2010	2020
Los Angeles Urban County (Including Culver City)				
Non-White/White	53.33	53.62	53.85	55.87
Black/White	68.29	63.51	60.24	64.21
Hispanic/White	62.81	64.99	64.38	65.12
Asian or Pacific Islander/White	41.58	48.57	49.62	52.79
Los Angeles County				
Non-White/White	55.32	55.5	54.64	56.94
Black/White	72.75	68.12	65.22	68.85
Hispanic/White	60.12	62.44	62.15	63.49
Asian or Pacific Islander/White	43.46	46.02	45.77	49.78

Source: HUD AFFH Data, 2020.

² Index of dissimilarity is a demographic measure of the evenness with which two groups are distributed across a geographic area. It is the most commonly used and accepted method of measuring segregation.

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. According to the 2015-2019 ACS, approximately 54% of the Culver City population belongs to a racial or ethnic minority group (Table E- 2). In comparison, racial/ethnic minorities make up 74% of the population countywide. Culver City's racial/ethnic minority population is smaller than neighboring jurisdictions to the east and south including Hawthorne (89.7%, Inglewood, (95.5%), and the City of Los Angeles (71.5%) but larger than the northern adjacent cities of Beverly Hills (22.2%), Santa Monica (35.4%) and West Hollywood (24.6%).

Table E- 2: Racial/Ethnic Composition of LA County, Culver City and Neighboring Cities

Jurisdiction	White	Black	Amer. Ind.	Asian	Pac. Islidr.	Other	Two or More	Hispanic/ Latino
LA County	26.2%	7.8%	0.2%	14.4%	0.2%	0.3%	2.3%	48.5%
Culver City	45.8%	8.7%	0.1%	16.2%	0.1%	0.6%	4.8%	23.7%
Beverly Hills	77.8%	1.9%	0.2%	9.1%	0.0%	0.4%	4.7%	5.9%
Hawthorn	10.3%	24.1%	0.2%	7.5%	0.3%	0.5%	2.2%	54.8%
Inglewood	4.5%	39.6%	0.3%	2.0%	0.4%	0.4%	2.2%	50.6%
Los Angeles (city)	28.5%	8.6%	0.2%	11.5%	0.1%	0.4%	2.3%	48.5%
Santa Monica	64.6%	4.4%	0.1%	9.8%	0.1%	0.6%	5.0%	15.4%
West Hollywood	75.4%	3.6%	0.1%	5.6%	0.3%	0.3%	4.5%	10.3%

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

Figure E- 2 shows the racial/ethnic minority concentrations in the region. Central Los Angeles County areas have high concentrations of non-White populations. The San Fernando Valley is also composed of mainly of block groups with non-White majority populations. Coastal communities, including coastal South Bay cities through Malibu, tend to have smaller racial/ethnic minority populations. The areas around Beverly Hills and West Hollywood also have smaller concentrations of racial/ethnic minorities.

Local Trend. Dissimilarity indices for Culver City were calculated using 2000 Census, 2010 Census, and 2015-2019 ACS block group demographic estimates (Table E- 3). The 2015-2019 ACS data indicates that Culver City is less segregated than the Urban County and Los Angeles County collectively. Since 2000, segregation between Black and White communities and Asian and White communities has worsened. Dissimilarity indices for Hispanic and White populations have gone down since the 2000 Census. Based on HUD's dissimilarity index thresholds, Black and White populations are moderately segregated while segregation between White populations and non-White, Asian, and Hispanic populations is low. Entropy indices for were also calculated for Culver City block groups.³ The entropy index is a multigroup measurement of segregation and diversity ranging from 0 to 1. A score of less than 0.37 indicates low diversity and a score greater than 0.74 indicates high diversity.⁴ Culver City has an entropy index score of 0.10.

³ Monkkonen, Paavo. University of California, Los Angeles (UCLA), Culver City Entropy Indices, August 2021.

⁴ Othering & Belonging Institute at UC Berkeley, The Roots of Structural Racism Project – Technical Appendix, 2021.

Table E- 3: Racial/Ethnic Dissimilarity Trends - Culver City

Racial/Ethnic Group	2000*	2010	2019
Non-White/White	22.65	17.24	21.71
Black or African American/White	39.27	46.96	44.64
Asian/White	13.72	14.64	29.57
Hispanic or Latino/White	35.31	26.80	26.14

Note: One block group (tract 7030.01, block group 3) contains some area that is not within the Culver City limits.

* 2000 Census block group data was not available for one tract (7030.01, block groups 1-3)) and one block group (tract 7025.02, block group 3).

Source: Veronica Tam & Associates, 2021; 2000 Census, 2010 Census, 2015-2019 ACS block group demographic estimates; HCD AFFH Guidance for All public Entities and for Housing Elements, April 2021.

Table E- 4 shows the change in racial/ethnic composition in Culver City using the 2006-2010 and 2015-2019 ACS. Overall, the racial/ethnic minority population has increased since from 52.8% in 2010 to 54.2% currently. The White and Black/African American populations have decreased slightly, while the population of Asian, Hispanic/Latino, and persons of two or more races has increased.

Table E- 4: Change in Racial/Ethnic Composition (2010-2019)

Race/Ethnicity	2010		2019	
White	18,314	47.2%	17,937	45.8%
Black or African American	4,043	10.4%	3,403	8.7%
American Indian and Alaska Native	58	0.1%	54	0.1%
Asian	5,680	14.6%	6,329	16.2%
Native Hawaiian and Other Pacific Islander	12	0.0%	38	0.1%
Some other race	218	0.6%	220	0.6%
Two or more races	1,384	3.6%	1,897	4.8%
Hispanic or Latino	9,118	23.5%	9,291	23.7%
Total	38,827	100.0%	39,169	100.0%

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

Figure E- 3 and Figure E- 2 compare the racial/ethnic minority population in Culver City between 2010 and 2018. The racial/ethnic minority population in most block groups has increased since 2010. Block groups with the highest percent of racial/ethnic minorities (between 60 and 80%) are located along the western and northeastern City boundaries, and in block groups in the southern section of the City. Racial/ethnic minorities make up between 40 and 60% in a majority of the City.

Sites Inventory. This inventory includes entitled/approved/ pipeline projects, potential Incremental Infill sites, and vacant and nonvacant sites throughout the City. However, ADUs are not included since that the sites inventory does not account for ADU potential on a site-specific basis. Since submitting the Draft Housing Element to HCD for review, the City has adjusted the sites inventory to remove and add sites based on public comments, and to update the pipeline project lists to reflect new opportunities expressed by developers and property owners on specific sites.

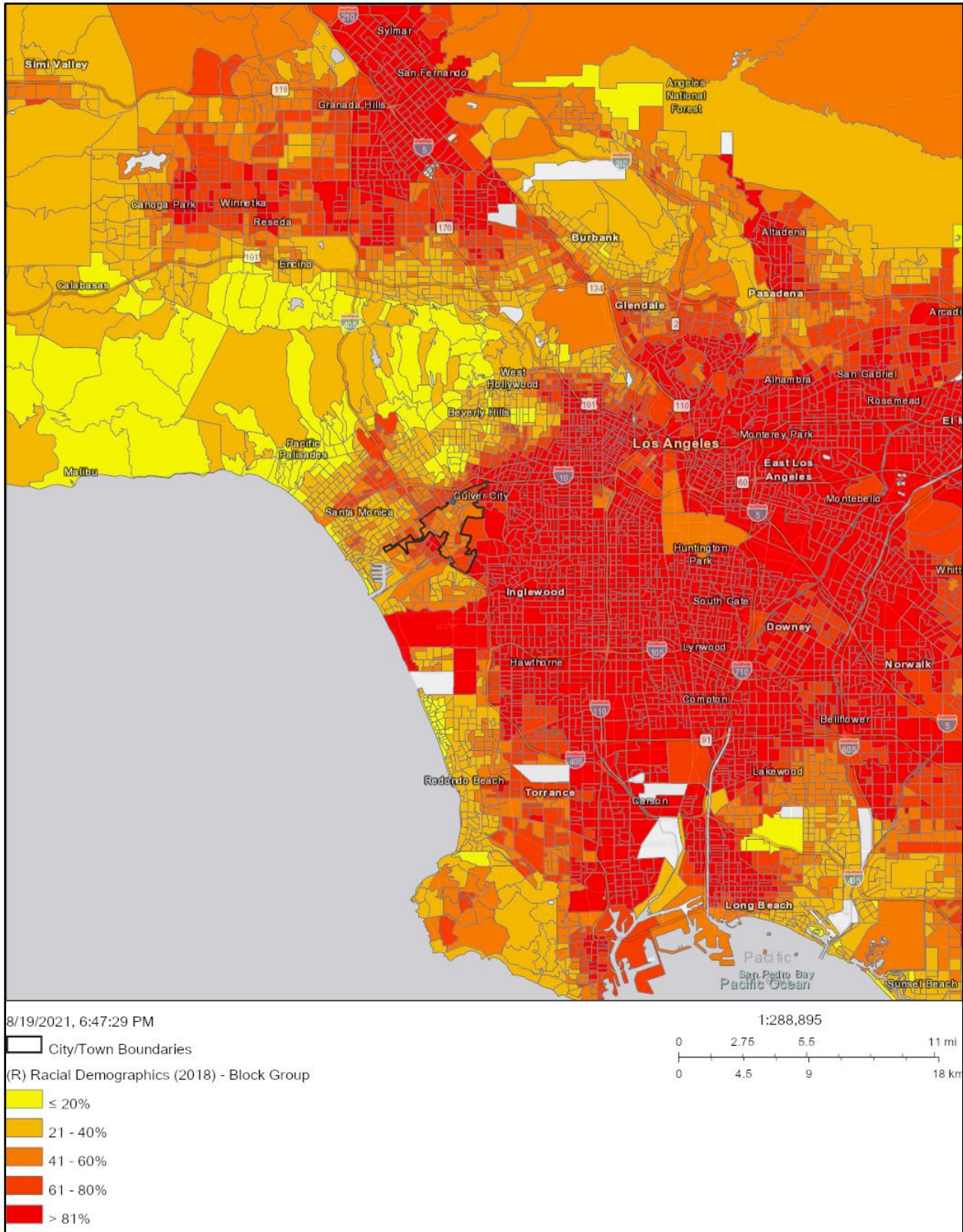
Figure E- 4 also shows the sites inventory used to meet the City's 2021-2029 Regional Housing Needs Assessment (RHNA). RHNA sites are generally evenly distributed throughout Culver City. Most RHNA sites, regardless income category, are located in areas with 41% or more of minority population. However, 54% of the City population is minority and therefore, this distribution is unavoidable. Most very low and low income RHNA units are in block groups where racial/ethnic minorities make up between 41% and 60% of the population. Approximately 61% of moderate income units and 67% of above moderate income units are located in 41% to 60% racially/ethnically minority concentrated block groups. Overall, though, a higher proportion of the RHNA sites are located in areas with a lower minority concentration. Specifically, 62% of all sites are located in areas with 41-60% minority, compared to 36% in areas with 61-80% minority (Table E- 5). High density sites, feasible for lower income housing, are located primarily along the city's major transportation corridors – Jefferson Boulevard and Sepulveda Boulevard. These areas are characterized by access to jobs, transportation, and services. The City will continue to improve these areas in order to build a decent and suitable living environment for its residents.

Table E- 5: Distribution of RHNA Units by Racial/Ethnic Minority Concentration

Racial/Ethnic Minority Concentration (Block Group)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
21-40%	0	0	73	148	221
41-60%	613	915	1,876	3,815	7,219
61-80%	630	611	1,144	1,746	4,131
Total	1,243	1,526	3,093	5,709	11,571
Racial/Ethnic Minority Concentration (Block Group)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
21-40%	0.0%	0.0%	2.4%	2.6%	1.9%
41-60%	49.3%	60.0%	60.7%	66.8%	62.4%
61-80%	50.7%	40.0%	37.0%	30.6%	35.7%
Total	1,243	1,526	3,093	5,709	11,571

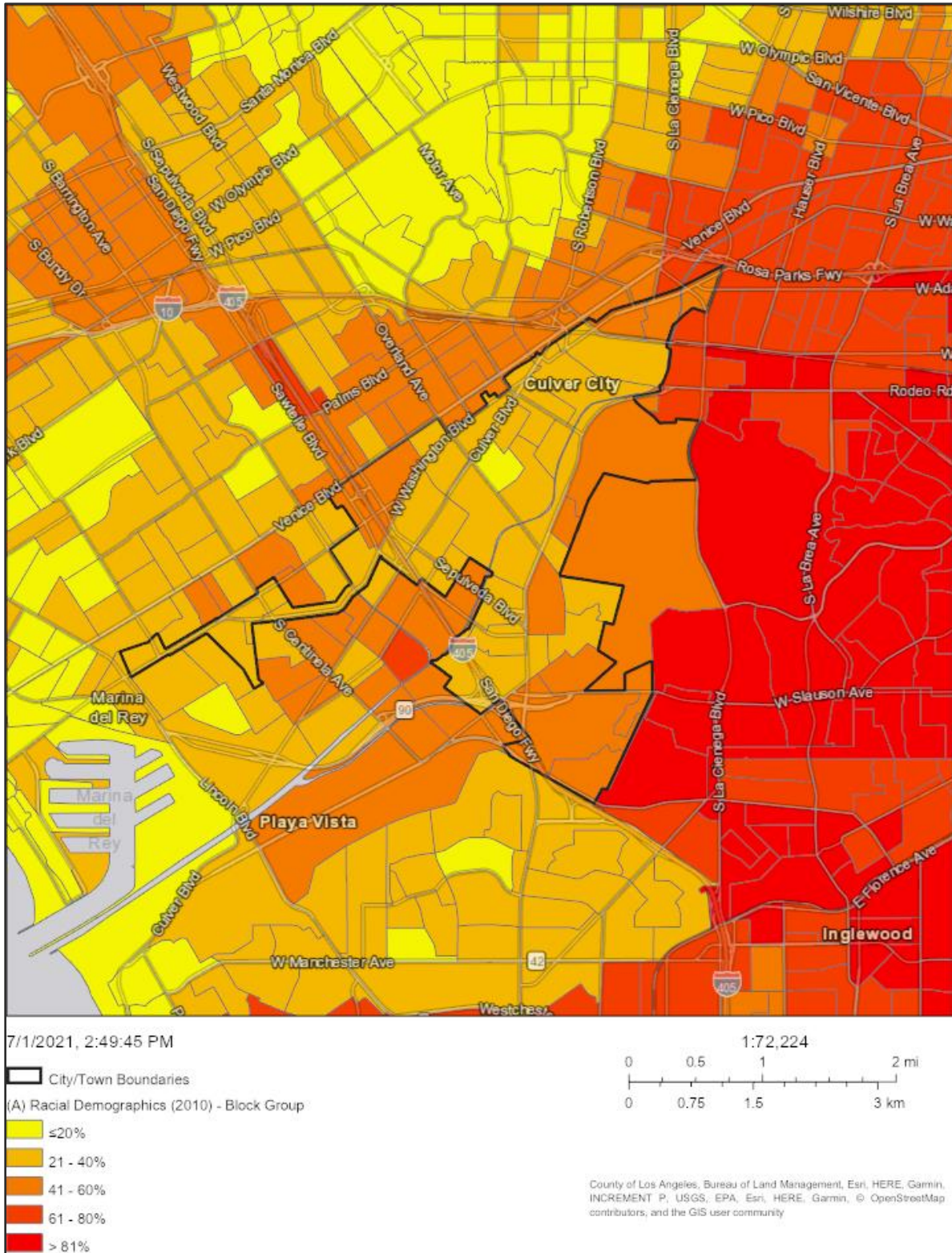
Note: The RHNA sites in this analysis include 1,246 Incremental Infill parcels that met the objective criteria for site selection.

Figure E- 2: Regional Racial/Ethnic Minority Concentrations



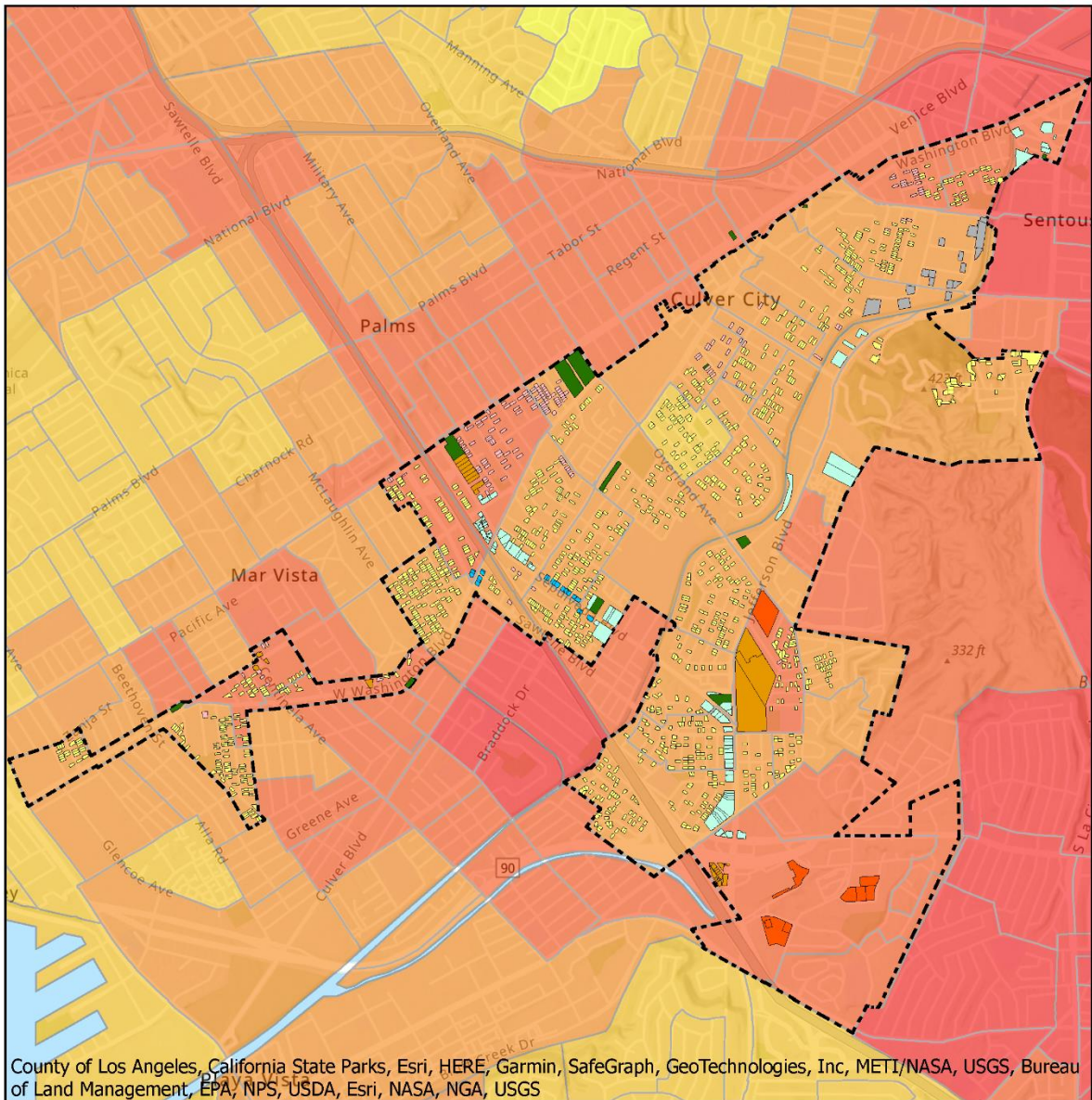
Source: HCD AFFH Data Viewer (Esri 2010, 2018), 2021.

Figure E- 3: Racial/Ethnic Minority Concentrations (2010)





Source: HCD AFFH Data Viewer (Esri 2010, 2018), 2021.

Figure E- 4: Minority Concentrations and RHNA Sites (2018)



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, Esri, NASA, NGA, USGS

Culver City Housing Element Sites Inventory with Minority Concentrated Areas of Population

<p>Sites Inventory</p> <p>Proposed General Plan (GP) Designation</p> <ul style="list-style-type: none"> Incremental Infill Neighborhood Multi-Family Neighborhood/Corridor MU 1 Neighborhood/Corridor MU 2 Mixed Use Medium Mixed Use High Industrial Mixed Use Approved/Entitled/Pipeline Projects Opportunity Sites 	<p>Racial Demographics 2018 (Block Group)</p> <p>Percent of Total Non-White Population</p> <ul style="list-style-type: none"> ≤ 20% 21 - 40% 41 - 60% 61 - 80% > 81% <p> City Boundary</p>	<p>N</p>  <p></p> <p>0 0.5 1</p> <p>Miles</p> <p><small>Data Provided By: California Department of Housing and Community Development Affirmatively Furthering Fair Housing Data and Mapping Resources https://affh-data-resources.caход.hud.arogis.com</small></p>
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Source: HCD AFFH Data Viewer (Esri 2010, 2018), 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, approximately 9.3% of Culver City residents experience a disability, compared to 9.9% countywide. The neighboring cities of Beverly Hills (8.7%), Hawthorne (9.6%), and Santa Monica (9.4%) have populations of persons with disabilities below the County average, while Inglewood (12.5%), the City of Los Angeles (10.1%), and West Hollywood all have larger populations of persons experiencing disabilities.

As shown in Figure E- 5, tracts in Culver City are generally consistent with the concentrations of persons with disabilities in the region. Tracts with populations of persons with disabilities exceeding 20% are in the central Los Angeles County areas, Santa Monica (Sawtelle Veterans Affairs (VA) Center), San Fernando Valley, and San Gabriel Valley areas.

Local Trend. Since the 2008-2012 ACS, the disabled population in Culver City and the county has increased from 8% and 9.3%, respectively. The most common disability types in Culver City are independent living difficulties and ambulatory difficulties. Approximately 5.8% of the Culver City population has an independent living difficulty and 4.8% has an ambulatory difficulty. Disabilities are most common amongst elderly residents; 12.4% of the population 65 years and older and 19.6% of the population 75 years and older experience a disability. Despite the smaller proportion of persons with disabilities in Culver City, Culver City has a larger population of seniors aged 65 or older (16.5%) compared to Los Angeles County as a whole (13.3%).

Figure E- 6 and Figure E- 7 compare the disability population over time using the 2010-2014 and 2015-2019 ACS. The concentration of persons with disabilities has increased in tracts in the northeastern and southern sections of the City. In three tracts, the 10 to 20% of the population are persons with disabilities. In the remainder of the City, less than 10% of the population experiences a disability. Tracts with larger populations of persons with disabilities are not generally concentrated in one area of Culver City.

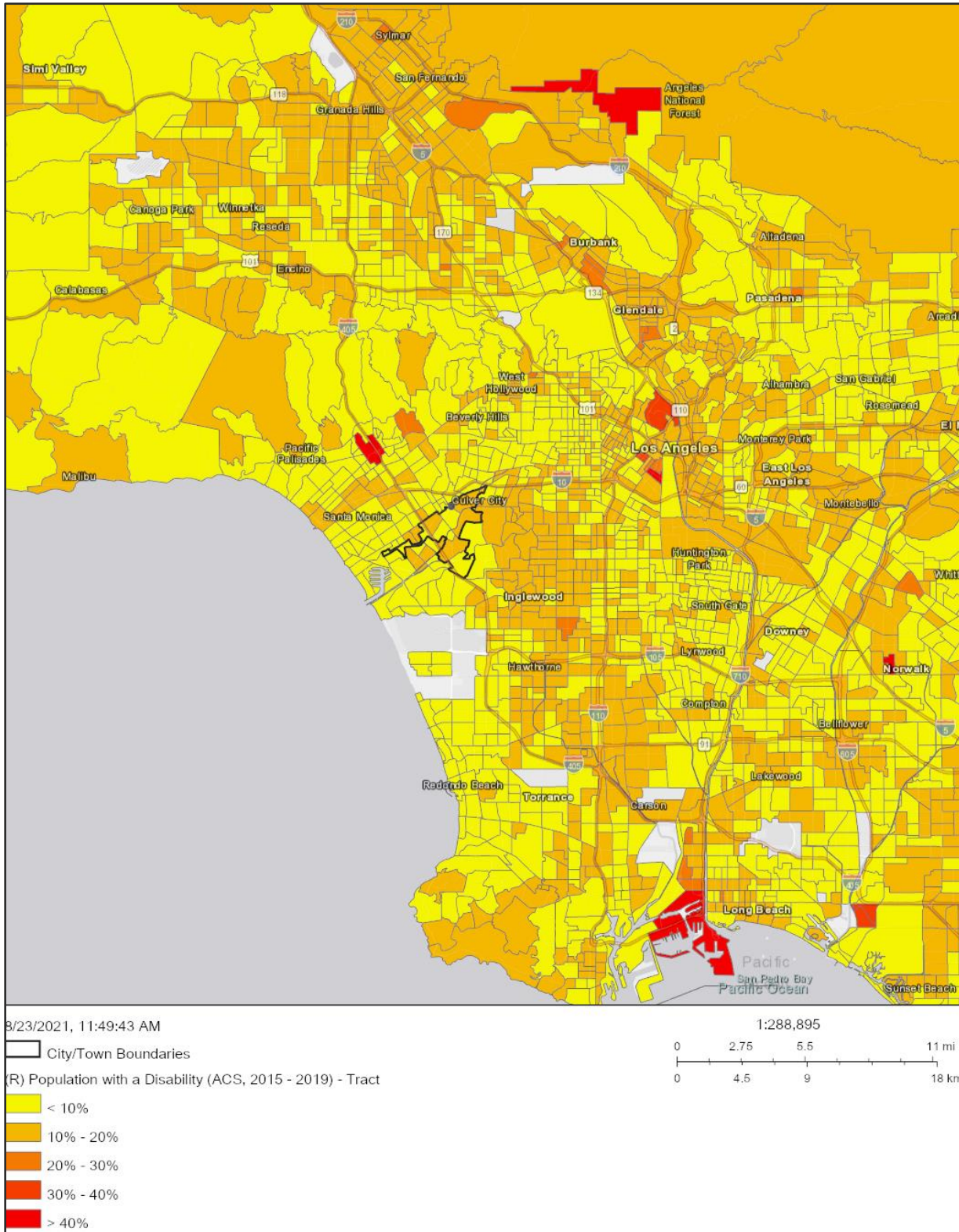
Sites Inventory. Figure E- 7 also shows the distribution of RHNA sites along with the current disability concentration by census tract. Some of the larger sites used to meet the City's 2021-2029 RHNA are in tracts in the southern areas of the City, where the persons with disabilities make up more than 10% of the total tract population. As presented in Table E- 6: Distribution of RHNA Units by Population of Persons with Disabilities, 34.4% of all RHNA units are in tracts where less than 10% of the population experiences a disability, and 65.6% of units are in tracts where 10-20% of the population experiences a disability. Half of very low income units and 64.5% of low income units are in tracts with a disabled population exceeding 10%, compared to 64.9% of moderate income units, and 69.6% of above moderate income units. In general, more RHNA sites, regardless of income category, are located in areas with higher percentage of persons with disabilities. Higher density sites are more appropriate for housing for persons with disabilities, given that these sites are located primarily along the City's major commercial and transportation corridors. Therefore, access to public transportation, jobs, and services renders these locations more convenient to persons with disabilities.

Table E- 6: Distribution of RHNA Units by Population of Persons with Disabilities

Disabled Population (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
<10%	621	541	1,085	1,734	3,981
10-20%	622	985	2,008	3,975	7,590
Total	1,243	1,526	3,093	5,709	11,571
Disabled Population (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
<10%	50.0%	35.5%	35.1%	30.4%	34.4%
10-20%	50.0%	64.5%	64.9%	69.6%	65.6%
Total	1,243	1,526	3,093	5,709	11,571

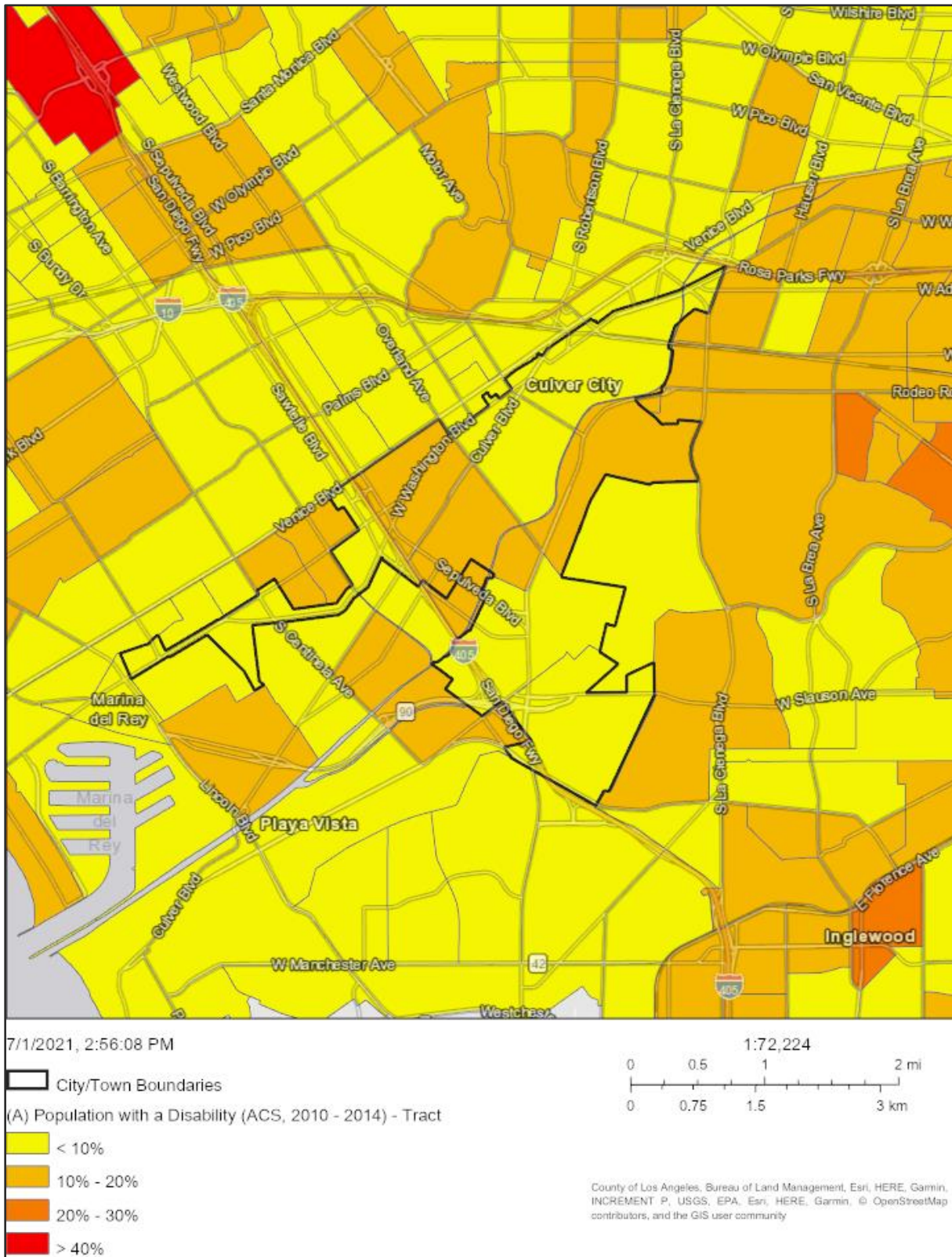
Note: The RHNA sites in this analysis include 1,246 Incremental Infill parcels that met the objective criteria for site selection.

Figure E- 5: Regional Concentration of Persons with Disabilities



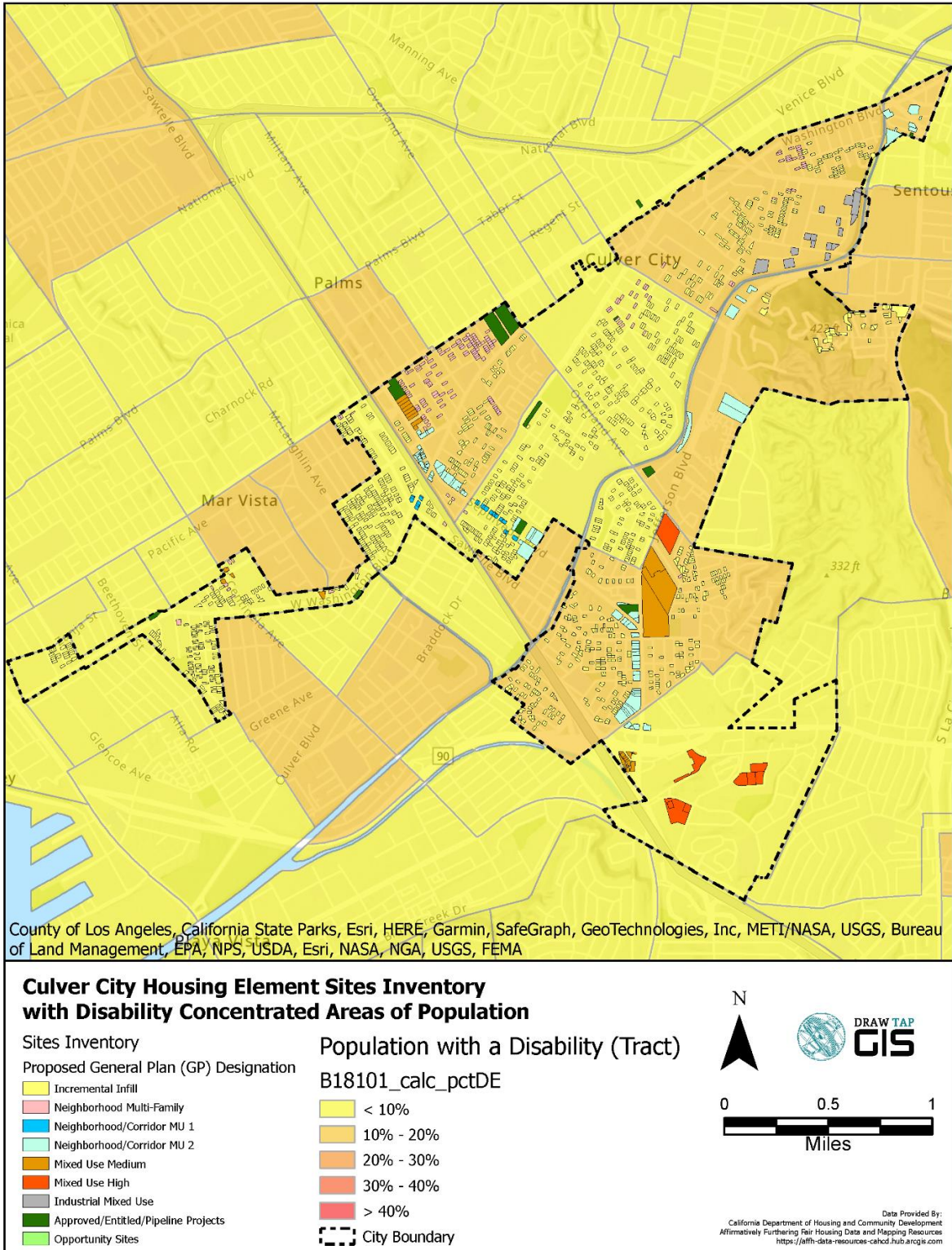
Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Figure E- 6: Concentration of Persons with Disabilities (2014)



Source: HCD AFFH Data Viewer (2010-2014 ACS), 2021.

Figure E- 7: Persons with Disabilities and RHNA Sites (2019)



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

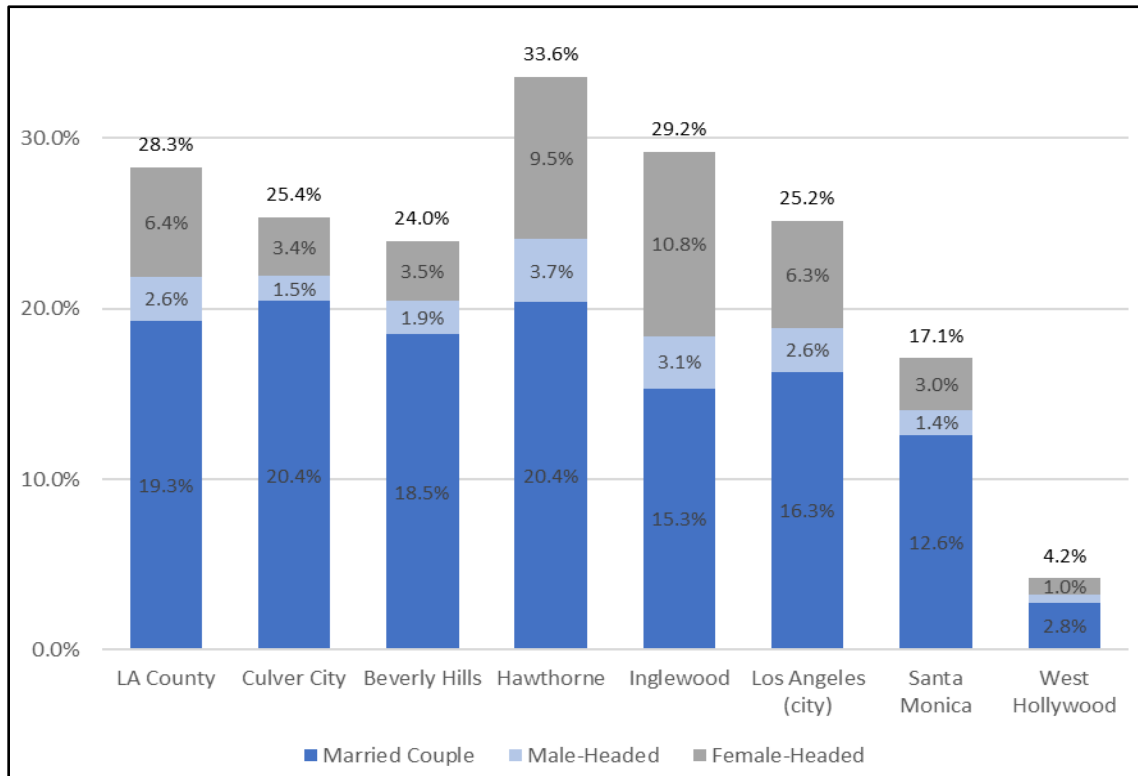
Familial Status

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 25.4% of Culver City households are households with children (Figure E- 8). The City's share of households with children is smaller than the county (28.3%) and the neighboring cities of Hawthorne (33.6%), and Inglewood (29.2%), but larger than Beverly Hills (24%), the City of Los Angeles (25.2%), Santa Monica (17.1%) and West Hollywood (4.2%). Figure E- 8 shows the distribution of households with children in Los Angeles County, Culver City, and neighboring jurisdictions. Hawthorne and Inglewood have the highest share of single-parent households. Culver City, Beverly Hills, Santa Monica, and West Hollywood have significantly smaller shares of single-parent households compared to 9% countywide.

Figure E- 9 and Figure E- 10 show the regional concentration of children living in married couple and single-parent female-headed households. Tracts where more than 40% of children live in female-headed households are concentrated in the central County areas around Inglewood and the City of Los Angeles, Long Beach, and in a few tracts in the San Fernando Valley and San Gabriel Valley areas. In most tracts, more than 60% of children live in married couple households.

Figure E- 8: Households with Children - LA County, Culver City, and Neighboring Cities



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

Local Trend. As discussed above, 25.4% of Culver City households are households with children, including 20.4% married couple households, 1.5% single male-headed households, and 3.4% single female-headed households. As shown in Table E- 7: Change in Household Type Composition (2010-2019), the City's share of households with children has remained constant since the 2006-2010 ACS. The proportion of married couple families with children has increased slightly, while the proportion of single-parent households has decreased.

Table E- 7: Change in Household Type Composition (2010-2019)

Household Type	2010		2019	
	Households	Percent	Households	Percent
With Children	4,266	25.3%	4,258	25.4%
Married Couple	3,216	19.1%	3,433	20.4%
Male Headed	328	1.9%	248	1.5%
Female Headed	722	4.3%	577	3.4%
Total HHs	16,870	100.0%	16,796	100.0%

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

As shown in Figure E- 11, over 60% of children in all Culver City tracts live in married couple households. In the northern and southern areas of the City, over 80% of children live in married couple households. Figure E- 12 shows the percentage of Children in female-headed households. In two tracts, 20-40% of children live in female-headed households. Fewer than 20% of children in the remainder of the City live in female-headed households.

Sites Inventory. Figure E- 11 and Figure E- 12 also show the sites inventory used to meet the City's 2021-2019 RHNA. As discussed above, Culver City is primarily comprised of tracts where 60-80% of children live in married couple households and tracts where over 80% of children live in married couple households. Approximately 45% of all RHNA units are in tracts where 60-80% of children live in married couple households, and 55% of units are in tracts where over 80% of children live in married couple households (Table E- 8). A larger proportion of lower income units are in tracts with a higher concentration of children in married couple households; 70.1% of very low income units and 77.5% of low income units are in tracts where over 80% of children are in married couple households, compared to only 51% of moderate income units and 47% of above moderate income units.

Table E- 8: Distribution of RHNA Units by Children in Married Couple Households

Percent of Children in Married Couple Households (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
60-80%	372	344	1,507	3,036	5,259
>80%	871	1,182	1,586	2,673	6,312
Total	1,243	1,526	3,093	5,709	11,571
Percent of Children in Married Couple Households (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
60-80%	29.9%	22.5%	48.7%	53.2%	45.4%
>80%	70.1%	77.5%	51.3%	46.8%	54.6%
Total	1,243	1,526	3,093	5,709	11,571

Note: The RHNA sites in this analysis include 1,246 Incremental Infill parcels that met the objective criteria for site selection.

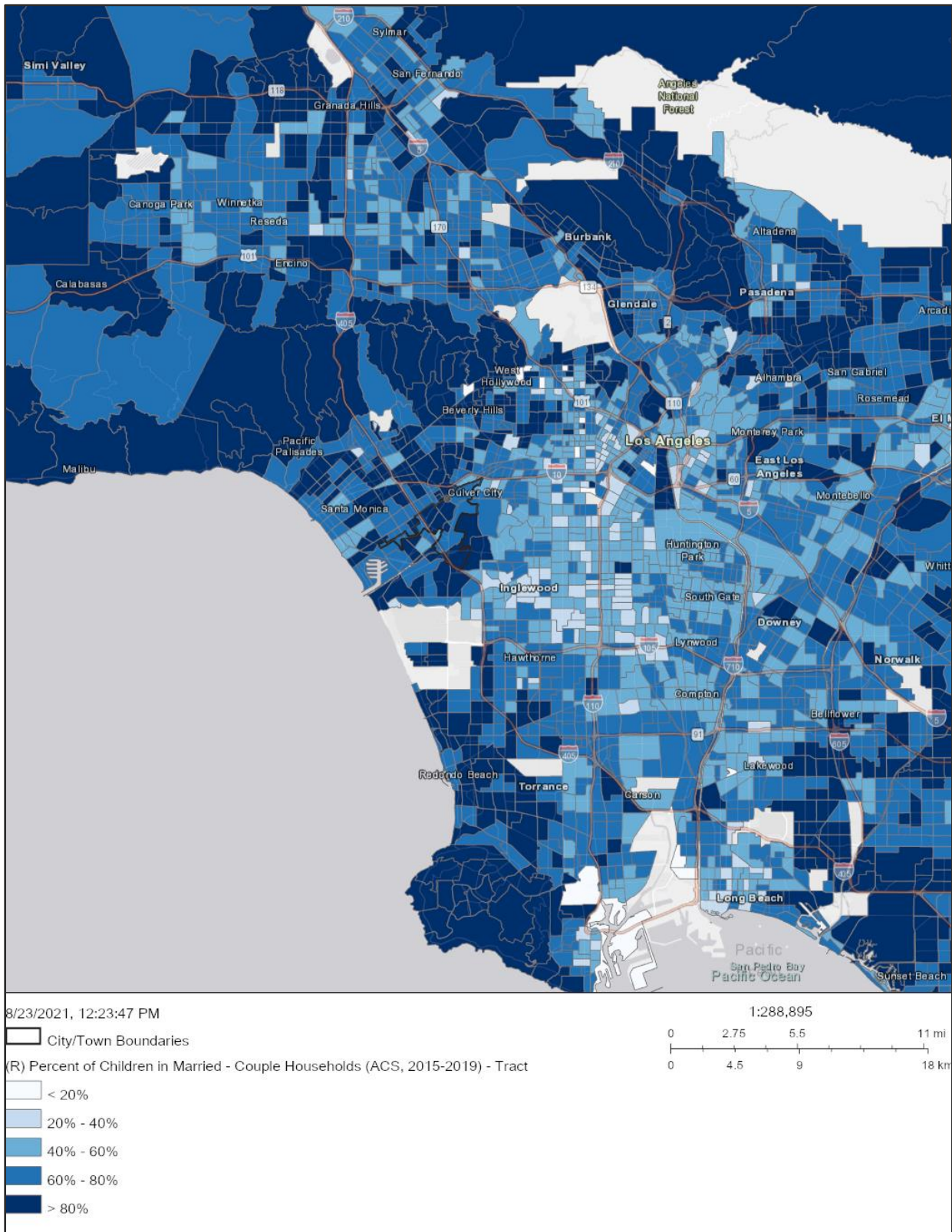
As shown in Table E- 9, majority of very low (97%), low (97%), and moderate income units (91%) are in tracts where fewer than 20% of children live in single-parent female-headed households. A larger proportion of above moderate income units (14%) are in tracts with a higher concentration of children female-headed households. As previously shown, only 3.4% of the City households are female-headed. Therefore, the distribution of units in areas with low concentrations of female-headed households with children is expected. Female-households generally have higher needs for childcare services and access to public transportation. Locating high density housing along transportation corridors offers access to transportation opportunities.

Table E- 9: Distribution of RHNA Units by Children in Female-Headed Households

Percent of Children in Female-Headed Households (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
<20%	1,203	1,482	2,808	4,925	10,418
20-40%	40	44	285	784	1,153
Total	1,243	1,526	3,093	5,709	11,571
Percent of Children in Female-Headed Households (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
<20%	96.8%	97.1%	90.8%	86.3%	90.0%
20-40%	3.2%	2.9%	9.2%	13.7%	10.0%
Total	1,243	1,526	3,093	5,709	11,571

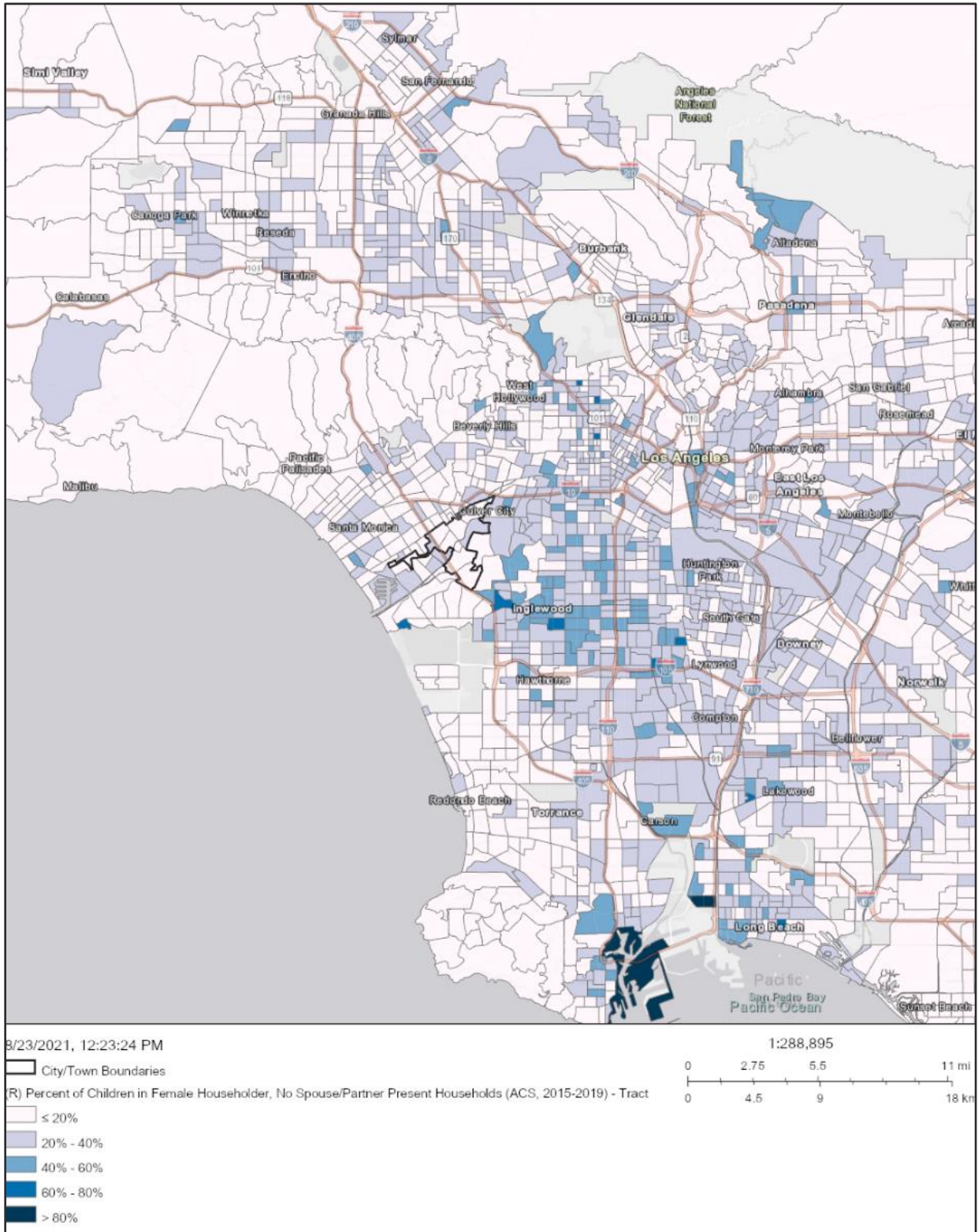
Note: The RHNA sites in this analysis include 1,246 Incremental Infill parcels that met the objective criteria for site selection.

Figure E- 9: Regional Concentration of Children in Married Couple Households



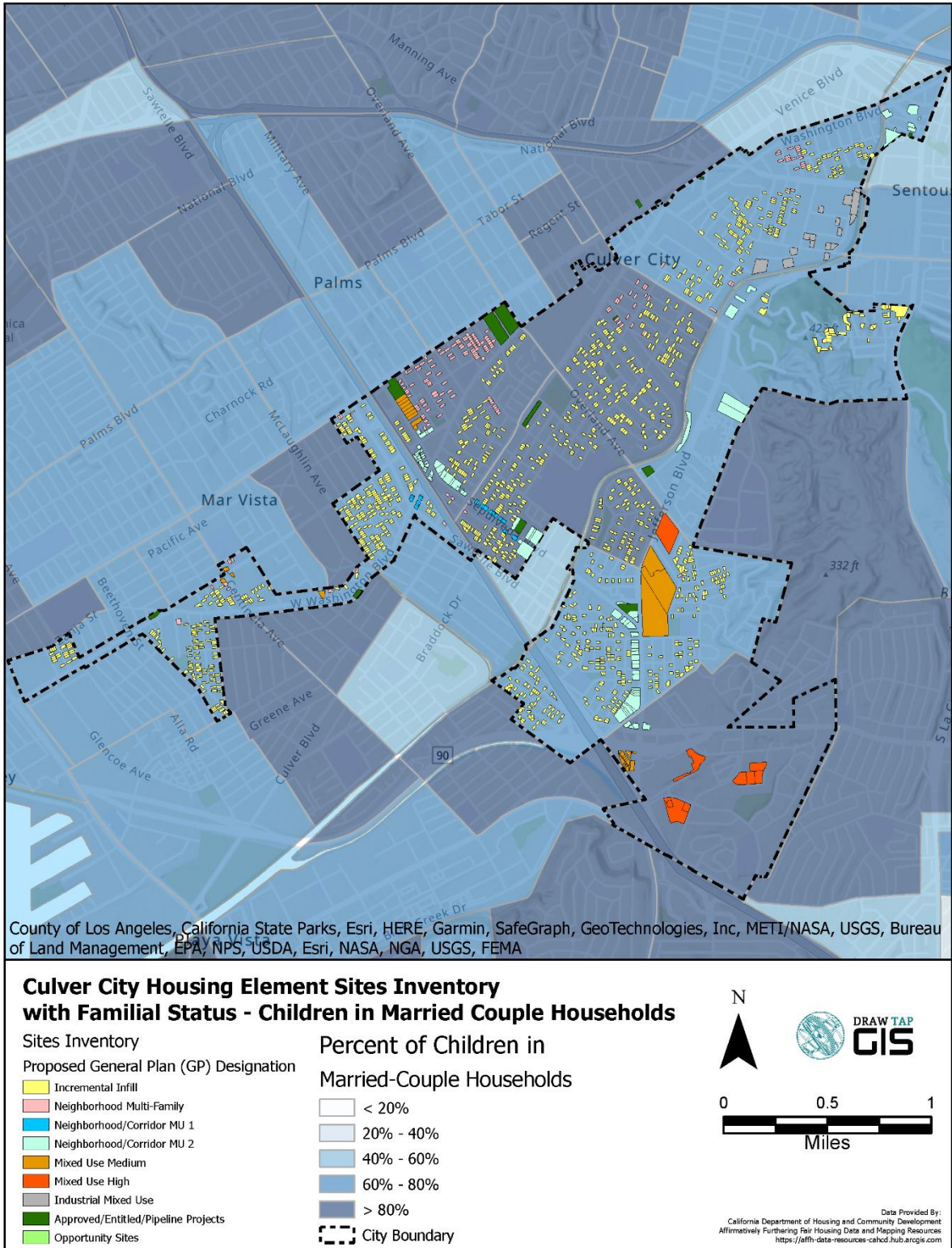
Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Figure E- 10: Regional Concentration of Children in Female-Headed Households



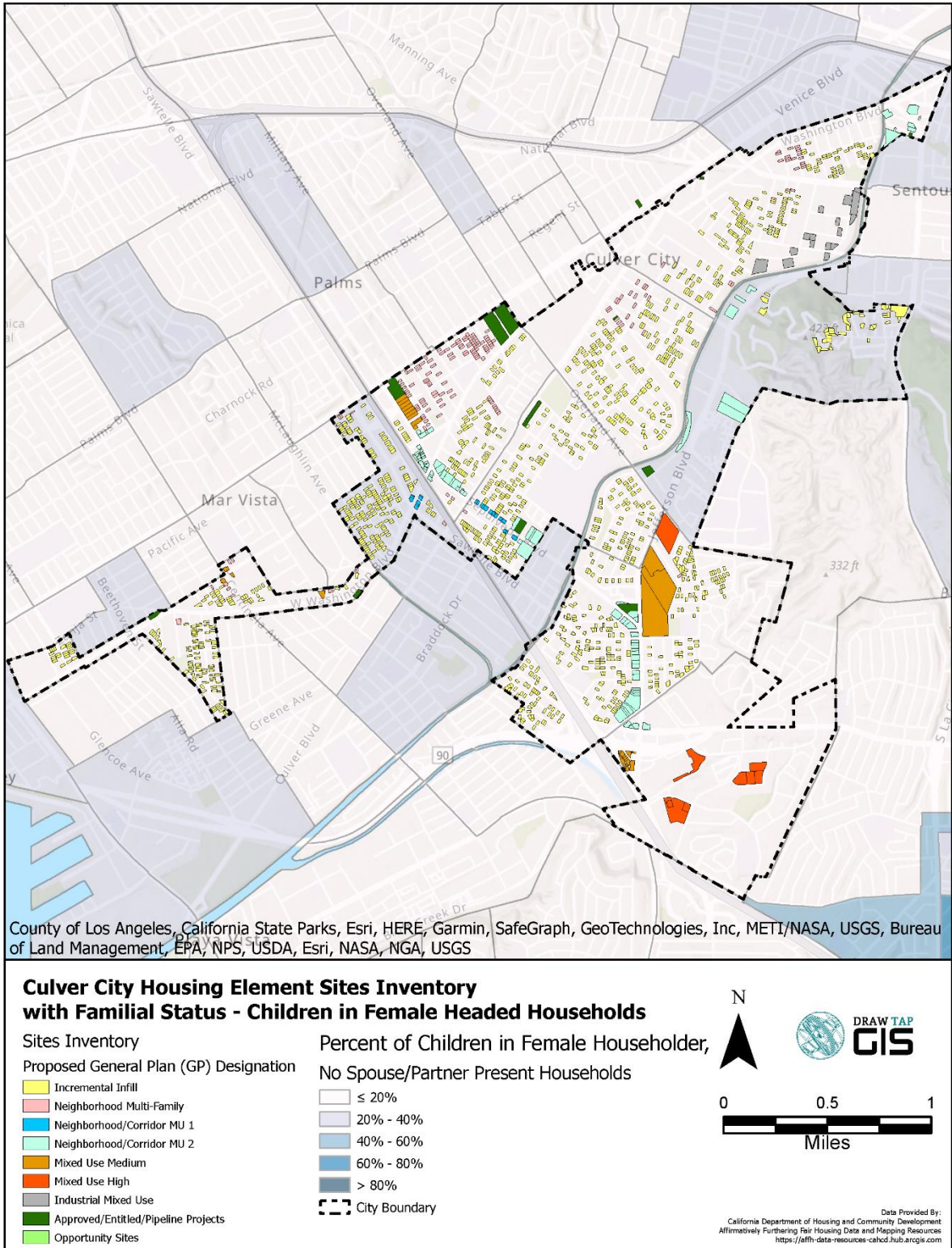
Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Figure E- 11: Concentration of Children in Married Couple Households and RHNA Sites



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

Figure E- 12: Concentration of Children in Female-Headed Households and RHNA Sites



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% of the population is LMI.

Regional Trend. HUD's 2013-2017 CHAS data (Table E- 10) shows that 32.4% of Culver City households earn 80 percent or less than the county area median income (AMI) and are considered lower income, a smaller share than the county (51.6%). According to the 2015-2019 ACS, the median household income in Culver City is \$95,044, higher than \$68,044 in the County and the adjacent jurisdictions of Hawthorne (\$54,215), Inglewood (\$54,400), the City of Los Angeles (\$62,142) and West Hollywood (\$74,044), but lower than Beverly Hills (\$106,936) and Santa Monica (\$96,570).

Table E- 10: Income Distribution in Culver City and Los Angeles County

Income Category	Culver City		Los Angeles County	
	Households	Percent	Households	Percent
<30% AMI	1,940	11.7%	641,055	19.5%
31-50% AMI	1,375	8.3%	482,070	14.6%
51-80% AMI	2,040	12.3%	578,285	17.5%
81-100% AMI	1,575	9.5%	312,595	9.5%
>100% AMI	9,615	58.1%	1,281,195	38.9%
Total	16,545	100.0%	3,295,200	100.0%

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

Figure E- 13 shows concentrations of Lower and Moderate Income (LMI) concentrations by tract regionally. Tracts with high concentrations of LMI households exceeding 50% of the population are located in the central Los Angeles County areas, and parts of the San Gabriel Valley and San Fernando Valley. Generally, coastal areas, the South Bay cities of Palos Verdes Estates and Rolling Hills through Malibu, have fewer LMI households.

Local Trend. As discussed previously, less than a third of the Culver City population is considered low income. Figure E- 14 shows LMI areas in the City by census block group. There are no block groups in Culver City with LMI populations exceeding 75%. The western side of the City has higher concentrations of LMI households making up 50 to 75% of the population. There is a total of five block groups in the City with LMI populations exceeding 50%. Most of the City is made up of block groups where the LMI population is less than 50%.

Sites Inventory. Figure E- 14 also shows the sites used to meet the City's RHNA. As discussed previously, sites are generally evenly distributed throughout the City. Table E- 11 shows that 31% of all RHNA units are in block groups where fewer than 25% of households are LMI, 46% of units are in block groups where 25-50% of households are LMI, and 23% of units are in block groups where 50-75% of households are LMI. Approximately 34% of moderate income units and 30% of above moderate income units are located in block groups where less than 25% of the population is LMI, compared to 35% of very low income units and 23% of low income units. The majority of the high density housing is located along transportation and commercial corridors. Such areas also have the higher probability of qualifying for housing funds such as the Low Income Housing Tax Credits (LIHTC) and Sustainable

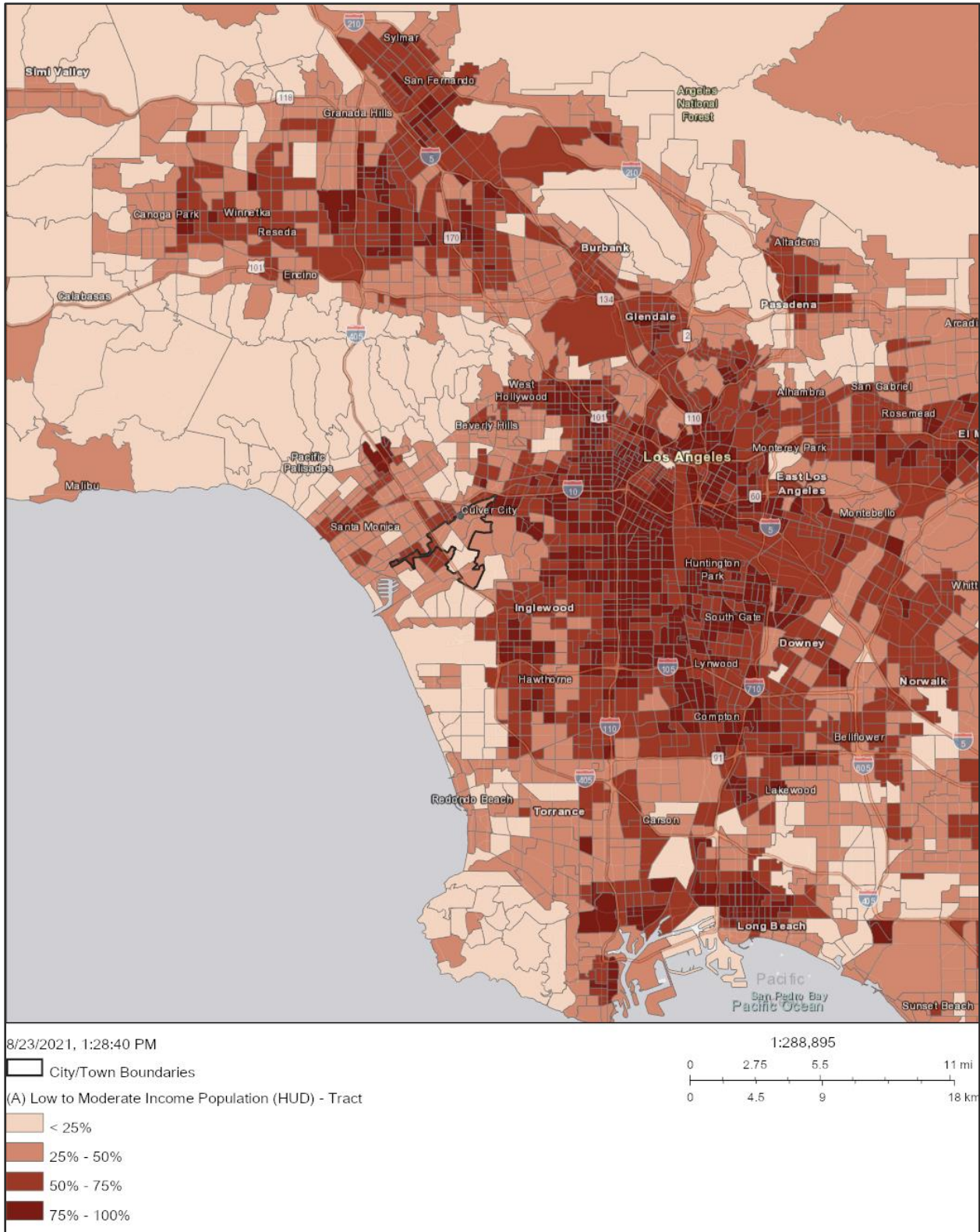
Communities and Affordable Housing funds. Furthermore, the City's inclusionary housing program will also foster mixed income housing in these areas.

Table E- 11: Breakdown of RHNA Units by LMI Population

LMI Population (Block Group)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
<25%	430	343	1,059	1,710	3,542
25-50%	634	601	1,352	2,747	5,334
50-75%	179	582	682	1,252	2,695
Total	1,243	1,526	3,093	5,709	11,571
LMI Population (Block Group)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
<25%	34.6%	22.5%	34.2%	30.0%	30.6%
25-50%	51.0%	39.4%	43.7%	48.1%	46.1%
50-75%	14.4%	38.1%	22.0%	21.9%	23.3%
Total	1,243	1,526	3,093	5,709	11,571

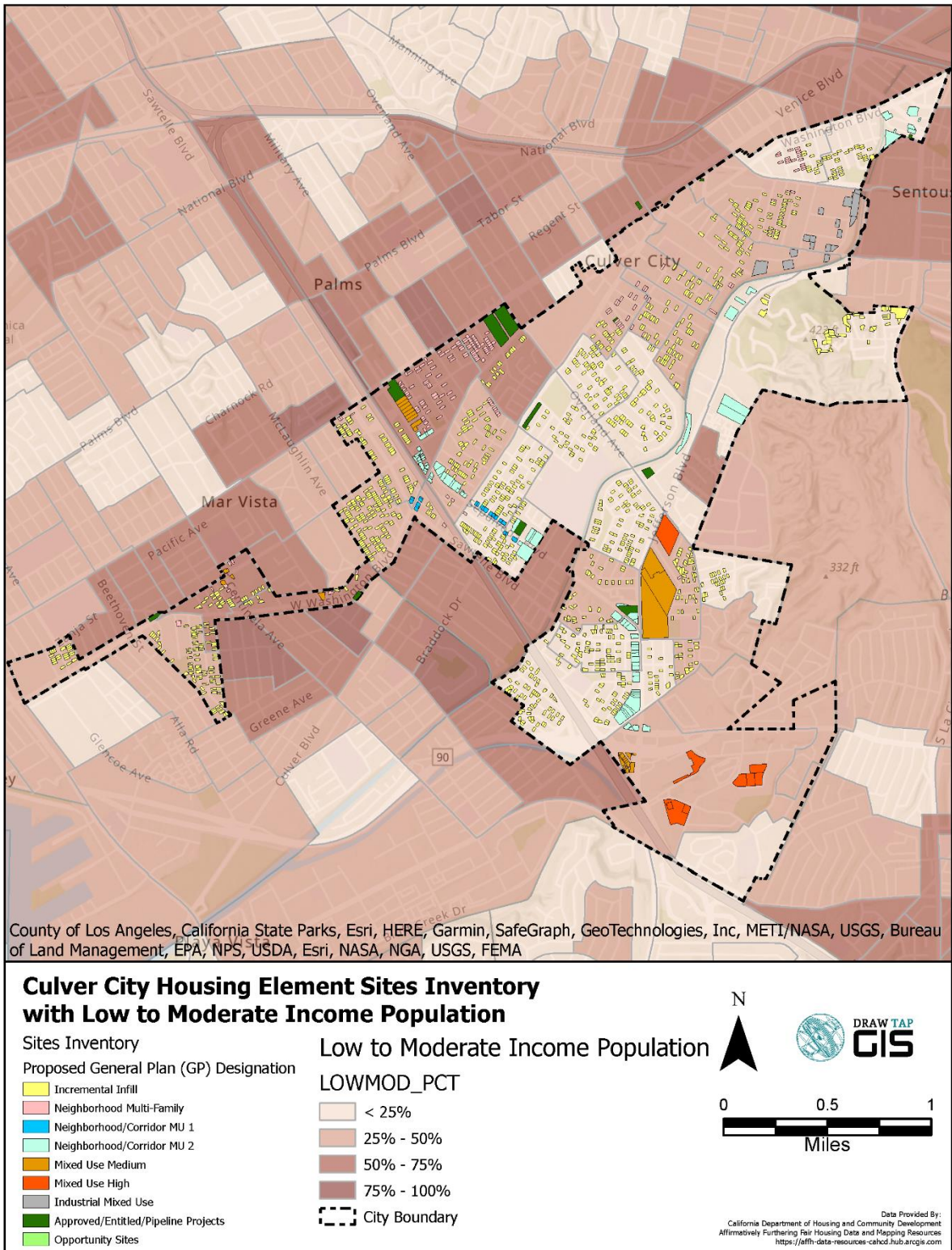
Note: The RHNA sites in this analysis include 1,246 Incremental Infill parcels that met the objective criteria for site selection.

Figure E- 13: Regional Concentration of LMI Households



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

Figure E- 14: Concentration of LMI Households



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

Racially or Ethnically Concentrated Areas of Poverty

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

In an effort to identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50%) with a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. The California Fair Housing Task Force, made up of the California Tax Credit Allocation Committee (TCAC) and HCD, created Opportunity Maps to identify opportunity characteristics for California jurisdictions. The TCAC Opportunity Maps identify areas of high segregation and poverty. TCAC Opportunity Maps area discussed in detail in Section 4, *Access to Opportunities*, of this Fair Housing Assessment.

According to HUD's 2020 R/ECAP mapping tool based on the 2009-2013 ACS, there are no R/ECAPs in Culver City. There are also no areas of high segregation and poverty identified in the city. A regional view of R/ECAPs, TCAC designated areas of high segregation and poverty, and poverty status by tract in Los Angeles County are shown in Figure E- 15. R/ECAPs, areas of high segregation and poverty, and tracts with higher concentrations of persons under the poverty level are most concentrated in the central county areas. R/ECAPs and areas of high segregation and poverty closest to Culver City are in the City of Los Angeles, east and southwest of Culver City. There are no tracts in the city where the population of persons below the poverty level exceeds 20%. In all but three Culver City tracts, less than 10% of the population is below the poverty level.

Poverty Status Trends. Certain types of housing such as subsidized housing, mobile home parks, and public housing buildings, may reveal why certain areas have larger populations of persons below the poverty level. The tracts with populations of persons below the poverty level exceeding 10% are shown along with subsidized housing units in Figure E- 16. There are no public housing buildings in the City. There are eight subsidized housing projects in the City: Caroline House (three affordable units), Accessible Apts. No 3 (13 affordable units), Eras Home II (six affordable units), Tilden Terrace (20 affordable units), Culver City Rotary Plaza (99 affordable units), Culver City Senior Housing (47 affordable units), Homeward Bound – Culver City (eight affordable units), and Homeward Bound – Hawthorne (eight affordable units). Tilden Terrace and Culver City Rotary Plaza are both located in tracts where the population of persons below the poverty level exceed 10%. While there are no subsidized housing units in the westernmost tract with a population of persons below the poverty level exceeding 10%, there are two mobile home parks located in this tract: Palms Mobile Lodge (20 units) and Grandview Mobilehome Park (24 units). There is one additional mobile home park in Culver City, Culver City Terrace (117 units), that is not located in a tract with a larger population of persons below the poverty level. Mobile homes tend to serve lower income households.

Currently, the westernmost tract with a population of persons below the poverty level exceeding 10% has a mix of residential zones including R1 (Residential Single Family), R2 (Residential Two Family), RLD (Residential Low Density Multiple), and RMD (Residential Medium Density Multiple). Of the remaining tracts with populations of persons below the poverty level exceeding 10%, the tract along the northern side is largely zoned for RMD,

while the tract on the eastern side is a mix of R1, OS (Open Space), and IG (Industrial General).

Racial/Ethnic Minority Population Trends. According to City staff, the Blair Hills and Fox Hills neighborhoods contain tracts where Black residents comprise the largest non-White group. Both neighborhoods are located on the eastern side of the City, adjacent to the Los Angeles County/City of Los Angeles neighborhoods of Baldwin Hills and Ladera Heights, both of which also have larger Black populations. From the 1920s to 1940s, Black populations were pushed out of westside cities and into unincorporated county areas such as Ladera Heights/View Park-Windsor Hills, as the unincorporated county did not have racial covenants like cities.

In the tract encompassing the Blair Hills neighborhood, 58.8% of the population is non-White including a Black population of 29.6%. The median household income in this tract is \$150,000, the second largest amongst Culver City tracts. Three tracts encompass the Fox Hills neighborhood, each with a Black population of 28%, 23%, and 31%, respectively. Median incomes for these tracts range from \$60,000 to \$90,000; \$60,000 is the third lowest median income amongst Culver City tracts. The Fox Hills neighborhood is characterized by a larger proportion of condos serving middle class populations than single-family homes. In general, the Black population in Culver City does not experience poverty at a high rate. Only 2.9% of the Black population citywide is below the poverty level (Table E- 12).

On the western side of the city there is a larger population of Hispanic/Latino residents (Figure E- 17). The Hispanic/Latino population in this area of the city is consistent with adjacent Los Angeles City tracts. This area has the highest concentration of block groups with median incomes below the Statewide average (see Figure E- 20). This neighborhood is characterized by older multi-family developments adjacent to Washington Boulevard, a large, heavily trafficked road, making it less desirable. Nearly 10% of the Hispanic/Latino population in Culver City is below the poverty level, significantly higher than the 6.1% citywide average (Table E- 12). These tracts are bordering the City of Los Angeles and the housing characteristics and demographics in these neighborhoods are more similar to Los Angeles.

Table E- 12 shows poverty status by race, ethnicity, and disability status. Culver City has a significantly smaller population of persons below the poverty level than the County. In the city, 13% of persons of a different race not listed, 9.8% of the Hispanic/Latino population, and 6.8% of the Asian population is below the poverty level compared to only 6.1% of the population citywide.

In general, racially/ethnically concentrated areas of poverty are far less prevalent in Culver City compared to the County. Concentrations of LMI households (see Figure E- 14) and persons below the poverty level (Figure E- 16) are largely due to the types of housing available in those areas. Staff noted that many of the Culver City neighborhoods along the city border have higher percentages of minority populations and multi-family housing that is similar to that of neighboring Los Angeles City. Importantly, a higher percentage of a minority population is not always correlated with income and does not always mean a neighborhood is lower income. For example, the tract encompassing the Blair Hills neighborhood has 58.8% minority population and a median income level of \$150,000. Through actions outlined in this Housing Element, the City will continue to work toward

improving the quality of life conditions in these areas and encourage affordable housing developments citywide.

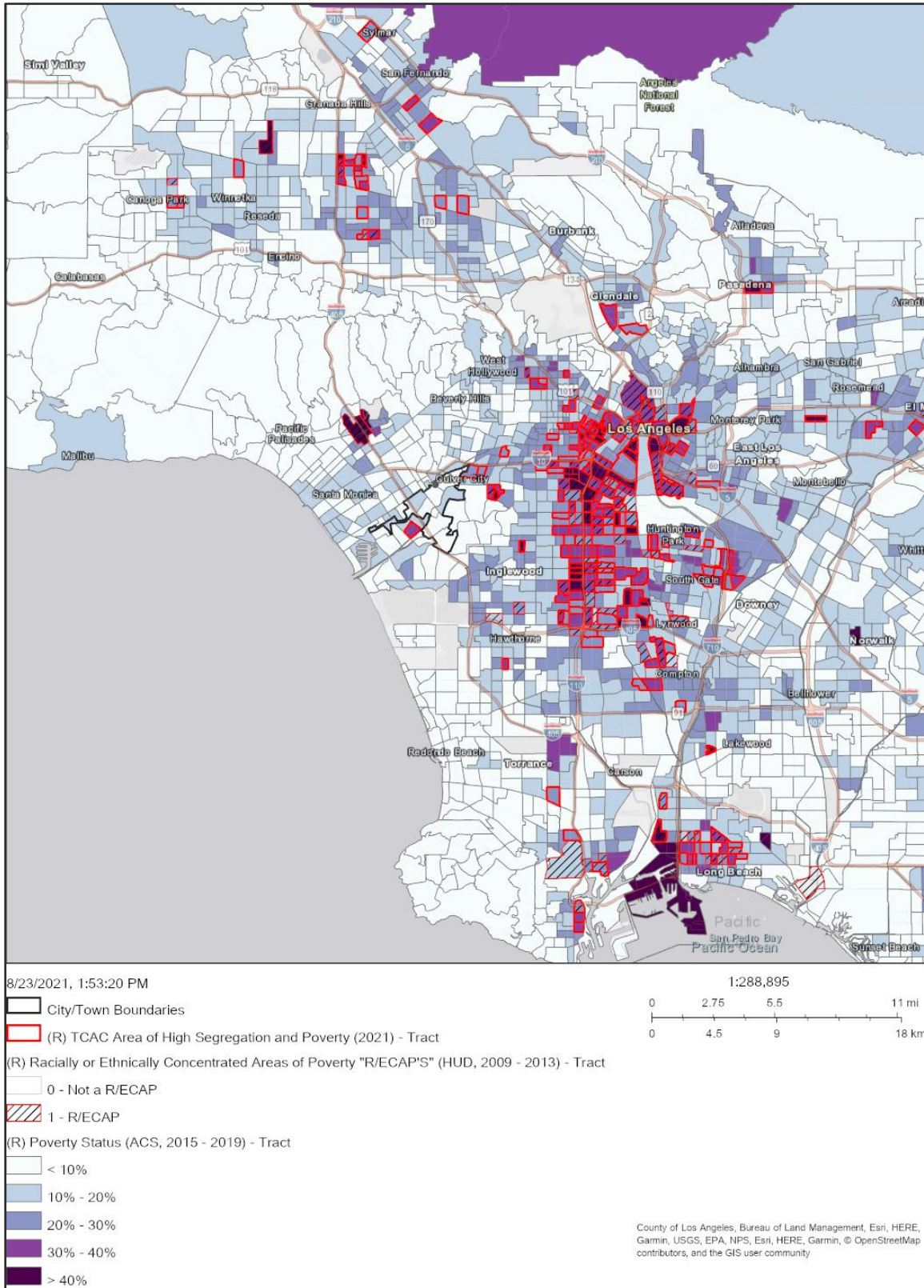
Table E- 12: Poverty Status by Race/Ethnicity and Disability Status

	Culver City		Los Angeles County	
	Total Population	% Below Poverty Level	Total Population	% Below Poverty Level
Black/African American	3,360	2.9%	799,551	20.8%
American Indian/Alaska Native	123	0.0%	71,877	18.1%
Asian	6,369	6.8%	1,449,582	11.1%
Native Hawaiian/Pacific Islander	43	0.0%	27,126	11.5%
Some other race	2,460	13.0%	2,097,544	19.2%
Two or more races	2,653	4.5%	393,536	11.7%
Hispanic/Latino	9,212	9.8%	4,835,446	18.1%
White alone, not Hispanic	17,833	4.6%	2,593,271	9.6%
With a disability	--	--	936,003	21.2%
Total	38,868	6.1%	9,928,773	14.9%

-- = Data not available.

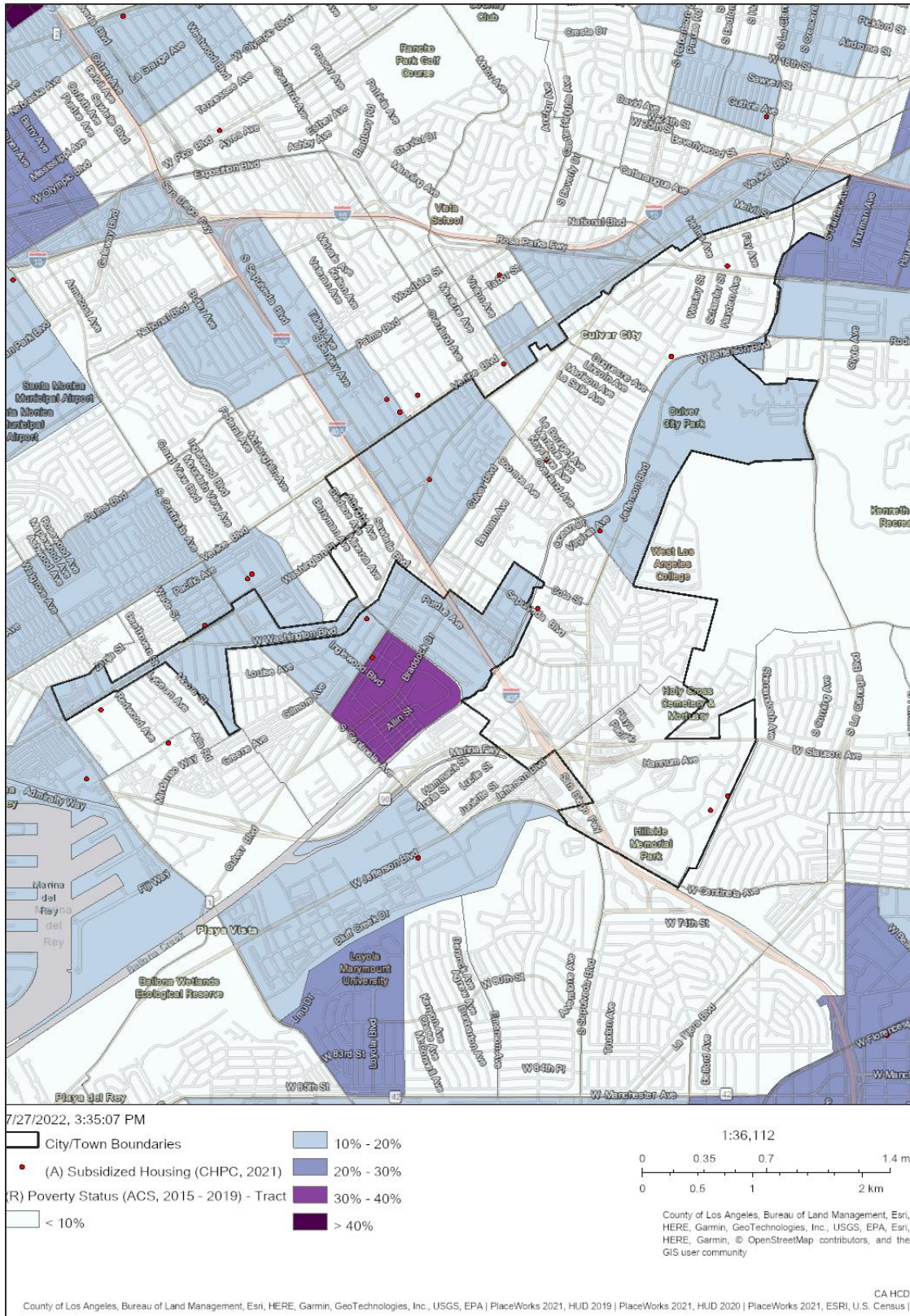
Source: 2015-2019 ACS (5-Year Estimate).

Figure E- 15: R/ECAPS, TCAC Areas of High Segregation and Poverty, and Poverty Status



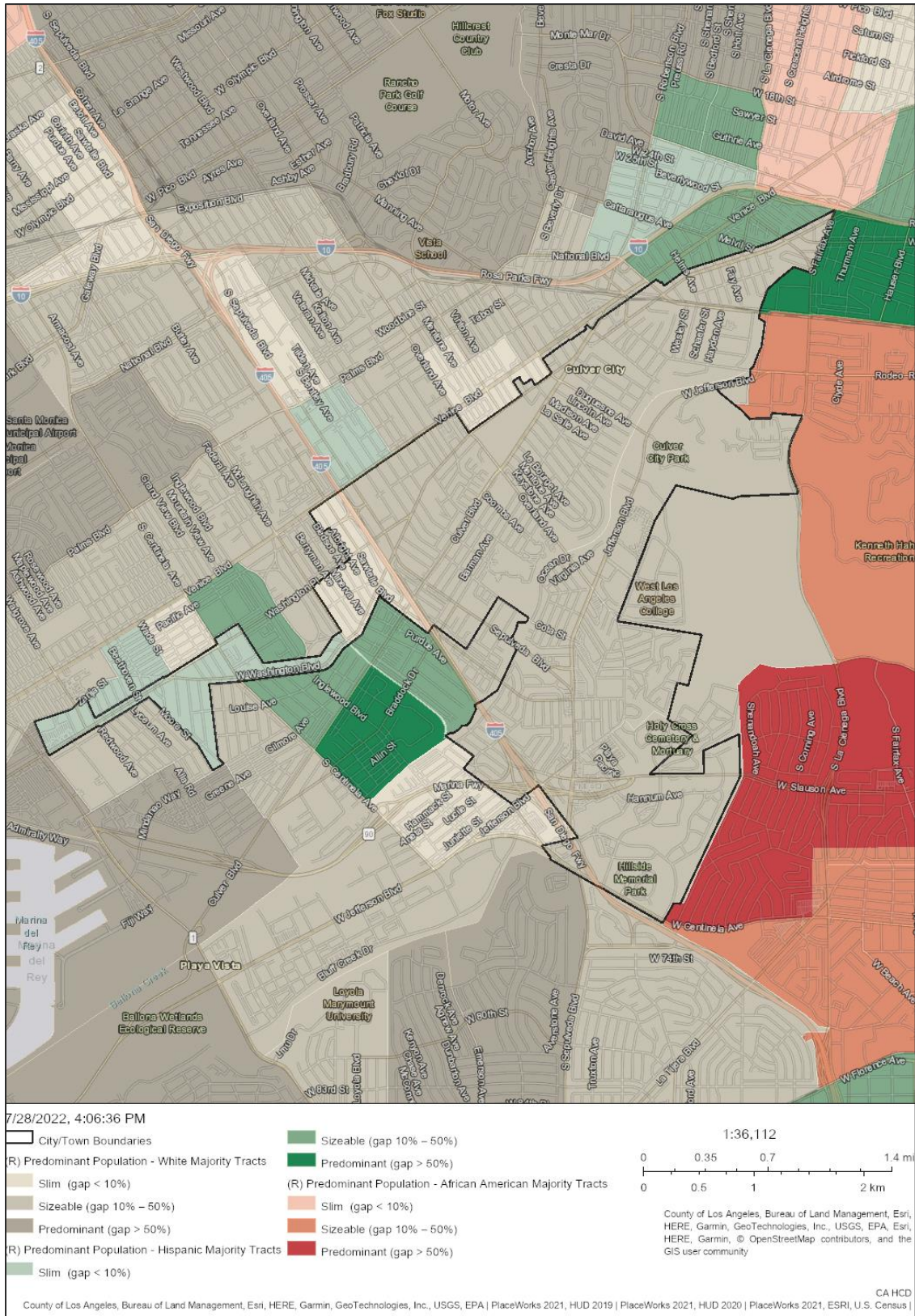
Source: HCD AFFH Data Viewer (HUD, 2009-2013; 2021 TCAC Opportunity Maps; 2015-2019 ACS), 2021.

Figure E- 16: Subsidized Housing Projects and Poverty Status by Tract (2021, 2019)



Source: HCD AFFH Data Viewer (2015-2019 ACS; 2021 California Housing Partnership (CHPC)), 2022.

Figure E- 17: Racial/Ethnic Majority Population by Tract (2018)



Source: HCD AFFH Data Viewer (2018 ESRI data), 2022.

Racially/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. 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% 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).

Figure E- 18 shows racial/ethnic predominant populations and Figure E- 19 shows median income by block group for the region. Central Los Angeles County areas comprised of mostly Hispanic majority tracts. The City of Inglewood and the surrounding areas have predominantly African American populations, parts of the San Gabriel Valley have Asian and Hispanic predominant populations, and several jurisdictions in the San Fernando Valley have Hispanic predominant populations. Many of these areas also have lower median incomes. In comparison, the coastal areas, from the South Bay to Malibu, the westside cities, Beverly Hills and the Pacific Palisades neighborhood, and parts of Burbank, Glendale, and Pasadena are comprised of tracts with White predominant populations. A majority of block groups in these areas also have median incomes exceeding the 2020 HCD median income of \$87,100.

Figure E- 20 shows racial/ethnic minority populations and median incomes by block group in Culver City. Several block groups in the City have median incomes over \$125,000. Block groups along the northwestern City boundary have median incomes below \$125,000, many below the State average of \$87,100. Most tracts in Culver City are White predominant; however, there are no block groups in the City where racial/ethnic minorities make up less than 20% of the population.

The central areas of the City generally have the highest median incomes exceeding \$125,000. In most block groups in the central and southern areas of the City, the median income exceeds the Statewide average, while block groups along the northwestern City boundary tend to have lower median incomes below the Statewide average of \$87,100. Several of these block groups also have non-White populations exceeding 60% and higher concentrations of LMI households (see Figure E- 4 and Figure E- 14). According to City staff, the wealthiest areas of the City are mostly occupied by single-family homes. Amenities such as views, privacy, and pools also increase the value of single-family homes. Units of this nature tend to be most common in the Blair Hills and Culver Crest neighborhoods.

The block group with the highest median income encompasses part of the Park West neighborhood. The population in this block group is 44.6% non-White. Culver City High School, Culver City Middle School, Farragut Elementary School, the County Library, and Veterans Memorial Park are highly accessible to this neighborhood. This area is also adjacent to Sony Studios, a major employment center, and the 405 Freeway.

The block group with the smallest non-White population (26.9%) has the 5th highest median income amongst Culver City block groups and neighborhoods the Park West neighborhood. The same amenities described above are accessible to households residing in the block group.

As of July 2022, HCD has released an RCAA map as part of the HCD AFFH Data Viewer. Consistent with the median income trend shown in Figure E- 20, Figure E- 21 shows that there are two RCAA tracts in Culver City located in the central area of the City. These tracts contain block groups with racial/ethnic minority populations consistent with a majority of the City. Most block groups with racial/ethnic minority populations exceeding 60 percent are not located within RCAA tracts. Similarly, LMI populations for block groups within the RCAA tracts are consistent with populations Citywide. There are a handful of LMI area block groups in the City, none of which are within the RCAA tracts.

The tract containing the Blair Hills neighborhood has not been identified as an RCAA, likely due to the large non-White population (58.8%). However, the block group with the largest White population is also not located in an RCAA. The Culver Crest and Park West neighborhoods are located in an RCAA.

According to the HCD AFFH Data Viewer, there are eight subsidized housing projects in the City. While subsidized housing projects are generally distributed throughout Culver City, there is only one within an RCAA tract. There are also three mobile home parks in the City: Culver City Terrace (117 units), Grandview Mobilehome Park (24 units), and Palms Mobile Lodge (20 units). Lower income households are more likely to reside in mobile homes than higher income households. There are no mobile home parks located within either of the RCAA tracts.

Tracts 7026 and 7027 have been identified as RCAAs. As presented in Figure E- 22, a majority of households residing in these tracts are owner-occupied households. A larger proportion of housing units in these tracts are also single-family homes compared to other tracts in the City (Figure E- 23). Single-family homes are typically more affordable to higher income households. This is consistent with zoning patterns in the City. The RCAA tracts are largely zoned R1 (Residential Single Family), whereas other areas of Culver City tend to have a larger mix of residential zoning designations (R2 (Residential Two Family), R3 (Residential Three Family), RLD (Residential Low Density Multiple), RMD (Residential Medium Density Multiple), and RHD (Residential High Density Multiple).

Comparison Between Higher and Lower Income Areas. The higher income areas were found to consist of more single-family residences, with private amenities such as views, privacy, and pools. However, community amenities associated with affordable fair housing, such as quality government services, schools, libraries, and parks were found to be accessible to both higher and lower income areas in the city.

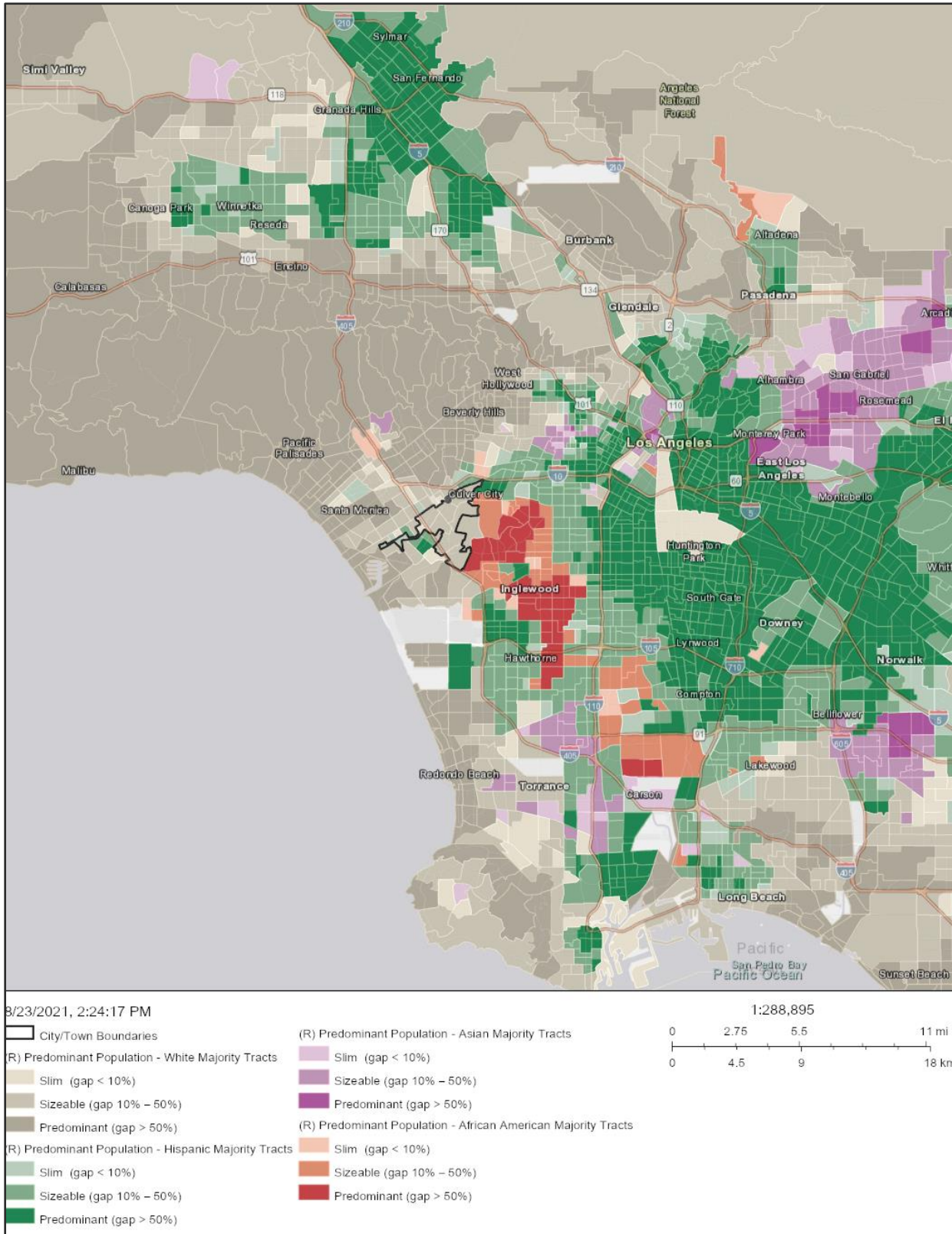
Sites Inventory. Furthermore, the Housing Element is updated along with the comprehensive update to the General Plan, which took a progressive approach to increasing density throughout the community, including in the City's more affluent neighborhoods (single-family areas) through the land use policy of incremental infills. More than 5,000 parcels will be redesignated as incremental infill through the General Plan update. Table E- 13 shows the distribution of RHNA units by median income by block group. There are 628 RHNA units (5.4%) located in block groups where the median income is less

than \$60,000. Over half of all units are in block groups with median incomes exceeding the State average but below \$125,000. The City's RHNA strategy does not disproportionately place lower income units in block groups with lower median incomes. Approximately 26% of above moderate income units and 37% of moderate income units are in block groups with median incomes below the Statewide average compared to only 24% of very low income units and 18% of low income units. In fact, the majority of the lower income units are located in areas with median incomes higher than \$87,100. Less than 20% of the lower income units are located in the lower income areas.

Table E- 13: Distribution of RHNA Units by Median Income

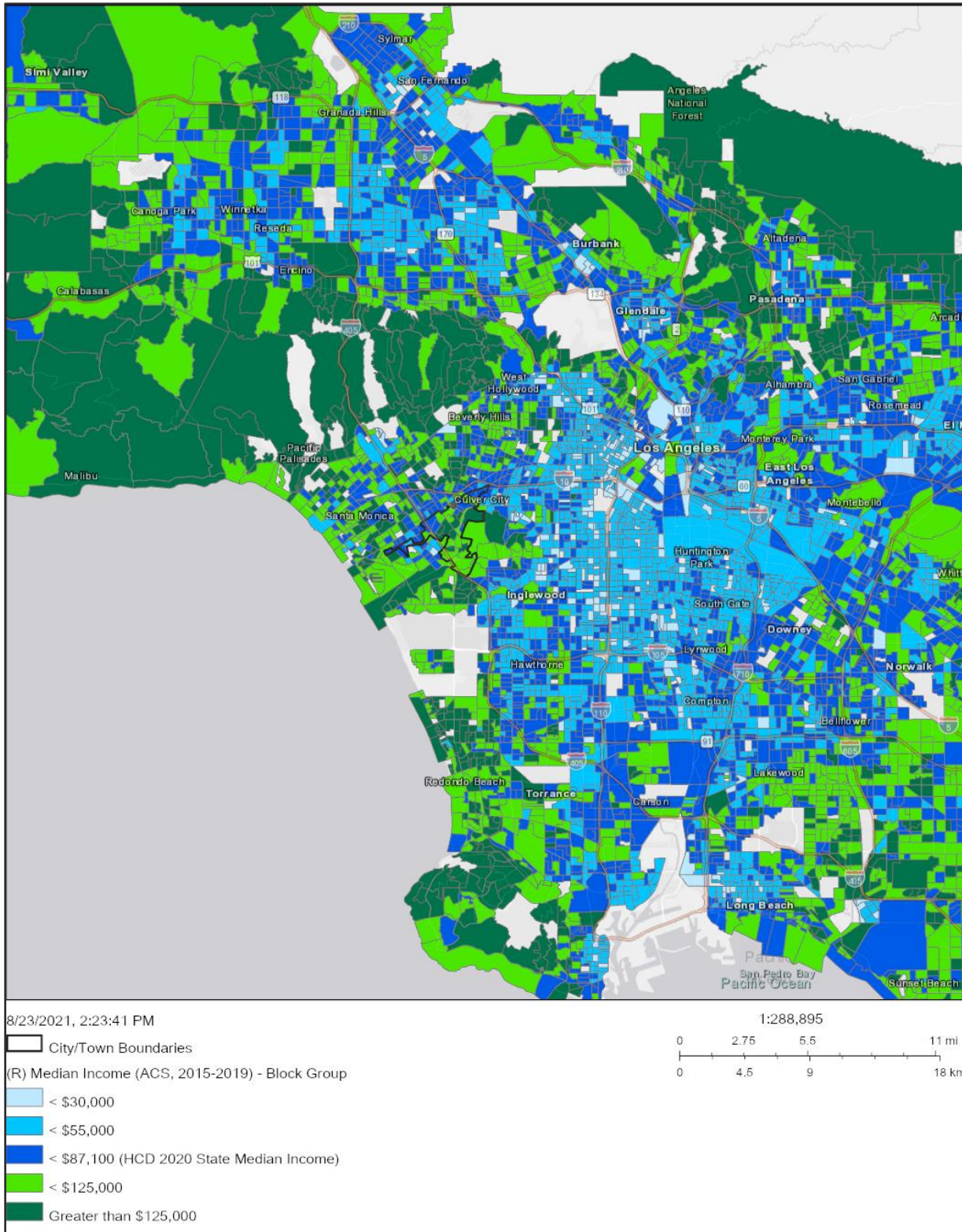
Median Income (Block Group)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
\$44,000-\$60,000	90	98	255	185	628
\$60,000-\$87,100	203	169	888	1,276	2,536
\$87,100-\$125,000	684	1,083	1,296	3,105	6,168
>\$125,000	266	176	654	1,143	2,239
Total	1,243	1,526	3,093	5,709	11,571
Median Income (Block Group)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
\$44,000-\$60,000	7.2%	6.4%	8.2%	3.2%	5.4%
\$60,000-\$87,100	16.3%	11.1%	28.7%	22.4%	21.9%
\$87,100-\$125,000	55.0%	71.0%	41.9%	54.4%	53.3%
>\$125,000	21.4%	11.5%	21.1%	20.0%	19.4%
Total	1,243	1,526	3,093	5,709	11,571

Figure E- 18: Predominant Racial/Ethnic Populations



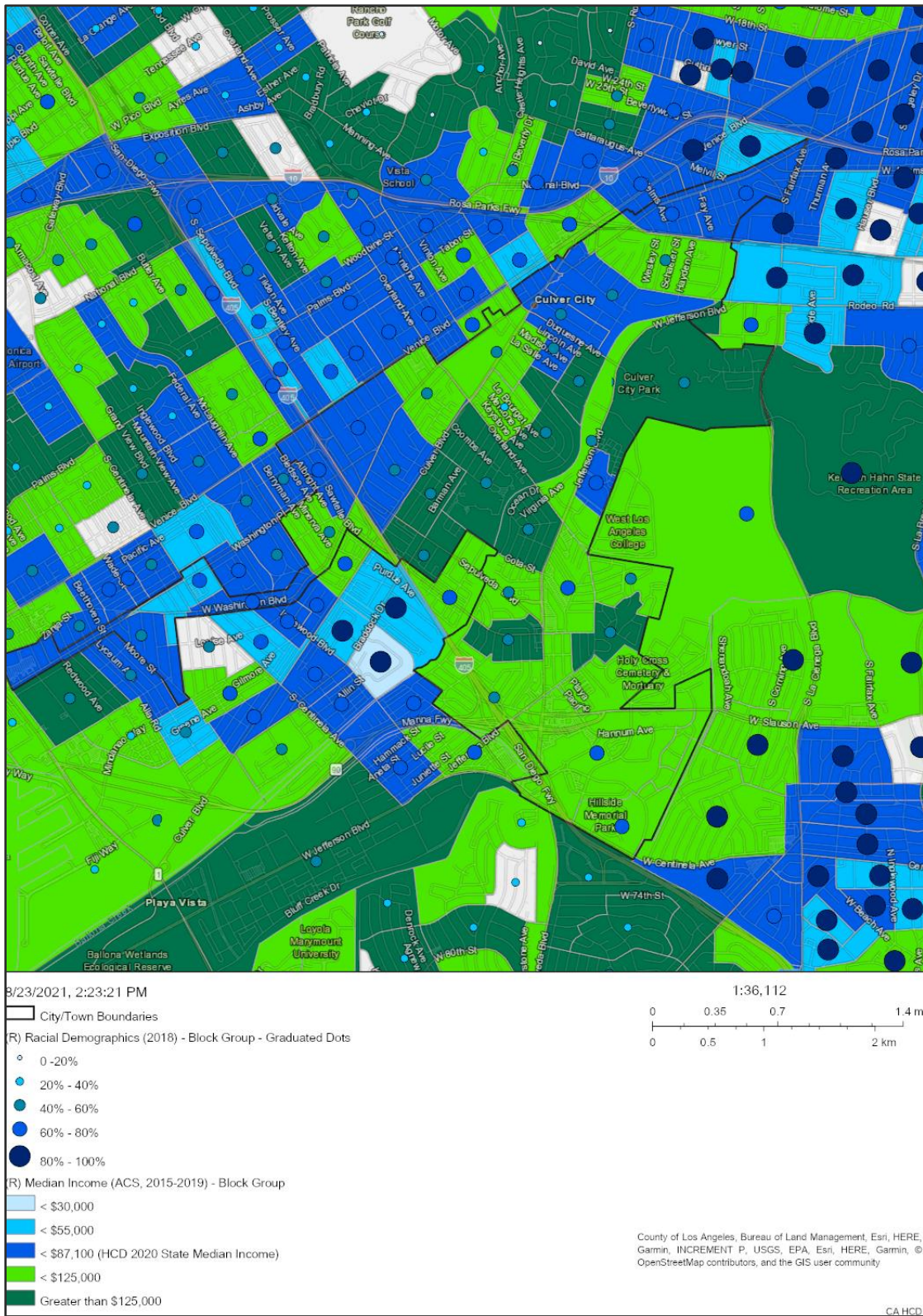
Source: HCD AFFH Data Viewer, 2021.

Figure E- 19: Regional Median Income by Block Group



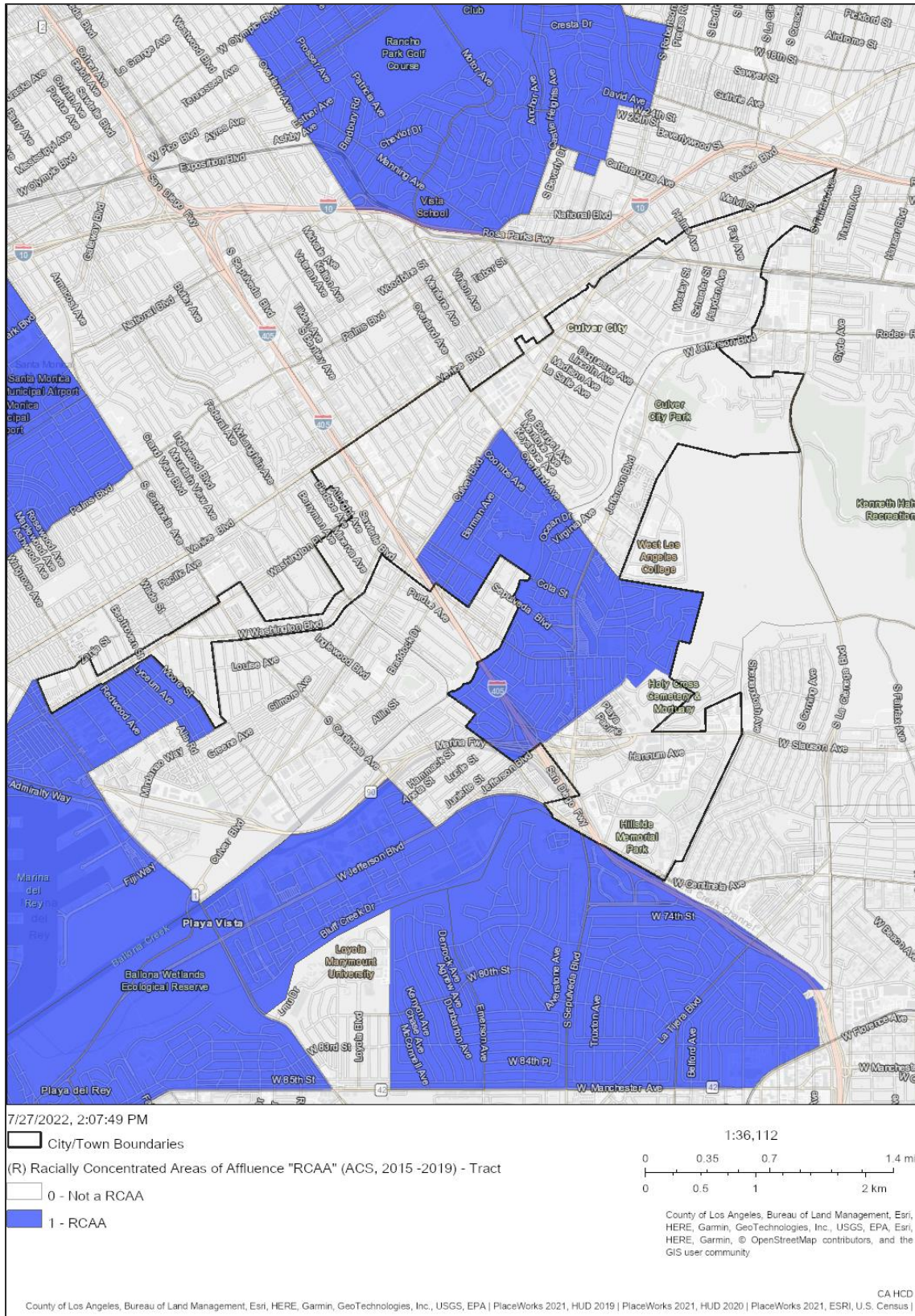
Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Figure E- 20: Racial/Ethnic Minority Populations and Median Income by Block Group



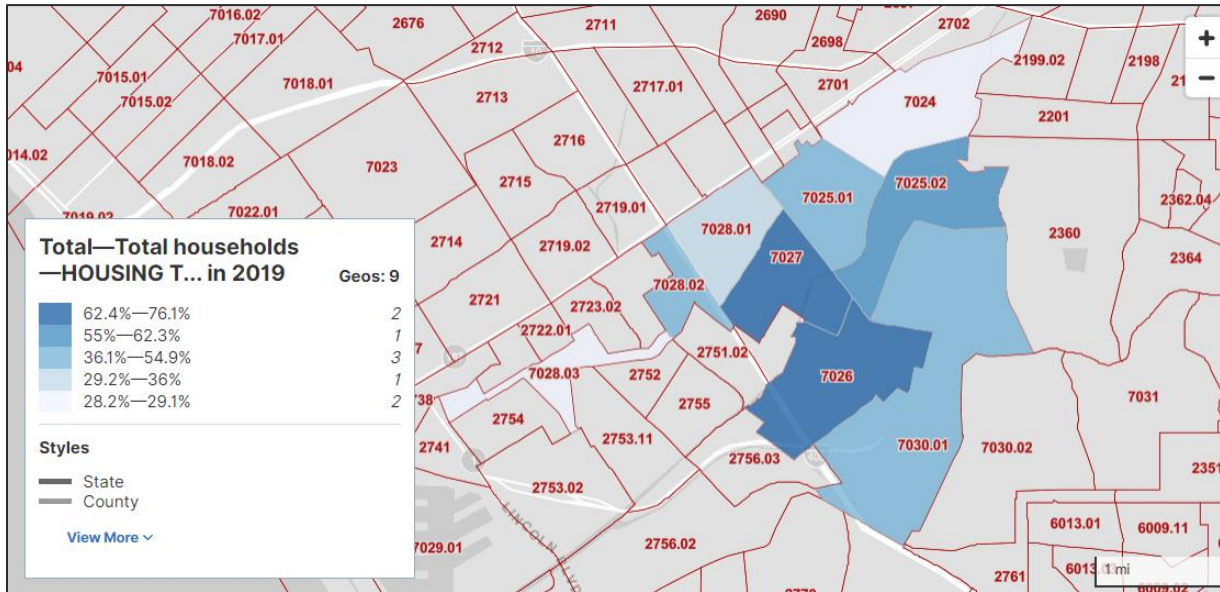
Source: HCD AFFH Data Viewer (2015-2019 ACS), 2021.

Figure E- 21: RCAAs by Tract (2019)



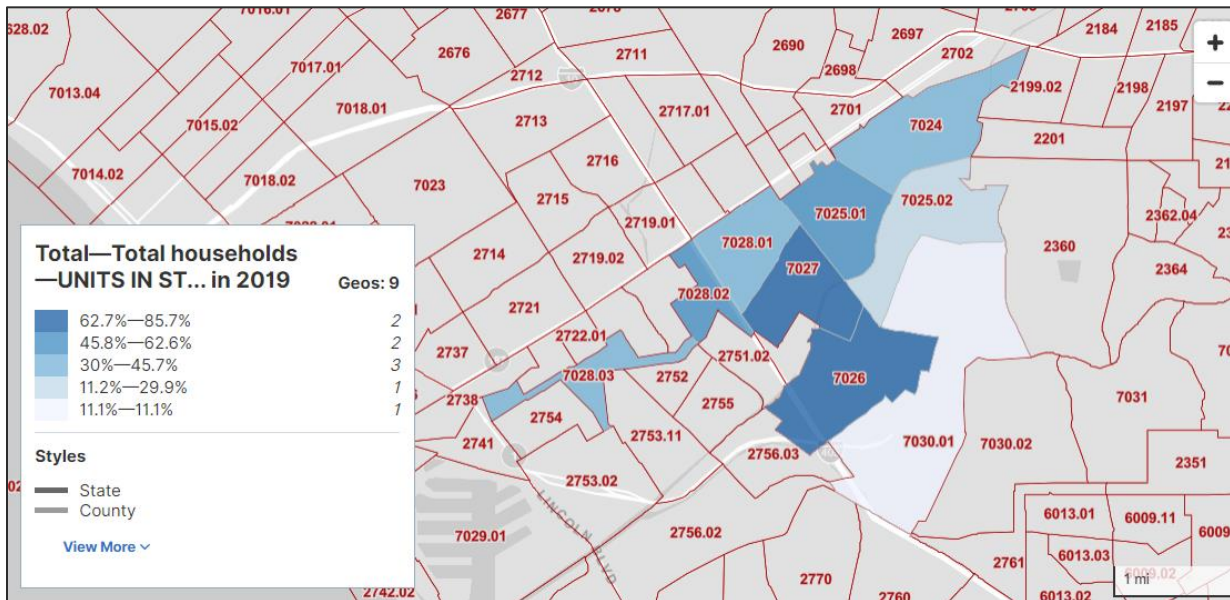
Source: HCD AFFH Data Viewer (2015-2019 ACS), 2022.

Figure E- 22: Owner-Occupied Households by Tract (2019)



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

Figure E- 23: One-Unit Structures (Single-Family Homes) (2019)



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

Access to Opportunities

HUD developed an index for assessing fair housing by informing communities about disparities in access to opportunity based on race/ethnicity and poverty status. Table E- 15 shows index scores for the following opportunity indicator indices (values range from 0 to 100):

- **Low Poverty Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the score, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the trips transit index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better access to employment opportunities for residents in a neighborhood.
- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. 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. 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- 14 shows the full list of indicators.

Table E- 14: Domains and 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: CA Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020.

Regional Trend. HUD provides AFFH data for jurisdictions receiving their own CDBG funds. Because Culver City is part of the Los Angeles County CDBG Program (Urban County), there is no HUD AFFH data for Culver City alone.

In the Los Angeles Urban County, Hispanic residents are most likely to be impacted by poverty, low labor market participation, and poor environmental quality. Black residents experience the lowest school proficiency and have the least access to employment opportunities. White residents scored the highest in low poverty, labor market participation, jobs proximity, and environmental health and Asian/Pacific Islander residents scored the highest in school proficiency. Hispanic residents are most likely to use public transit and Black residents have the lowest transportation costs.

Compared to the County, Urban County residents, regardless of race or ethnicity, were less likely to be exposed to poverty and have higher school proficiency. Residents countywide are more likely to use public transit and have lower transportation costs compared to Urban County residents. Environmental health is better in the Urban County for White, Black, and Native American residents, but worse for Hispanic and Asian residents.

Table E- 15: HUD Opportunity Indicators

	Low Poverty	School Prof.	Labor Market	Transit	Low Trans. Cost	Jobs Prox.	Envi. Health
Urban County (including Culver City)							
Total Population							
White, Non-Hispanic	70.12	72.18	68.22	76.66	67.60	55.10	22.89
Black, Non-Hispanic	46.29	41.09	42.82	84.10	73.91	41.10	14.44
Hispanic	40.70	43.31	34.05	84.98	73.75	44.48	11.98
Asian or Pacific Islander, Non-Hispanic	68.38	72.86	66.73	82.22	68.98	51.22	13.86
Native American, Non-Hispanic	54.75	55.06	48.03	77.80	69.62	45.65	20.02
Population below federal poverty line							
White, Non-Hispanic	61.23	66.91	61.96	79.48	71.45	55.51	20.59
Black, Non-Hispanic	29.03	29.31	27.29	85.47	76.25	30.59	12.84
Hispanic	28.75	35.77	26.10	87.23	76.67	41.99	10.38
Asian or Pacific Islander, Non-Hispanic	61.63	70.67	62.58	83.88	72.41	51.16	13.30
Native American, Non-Hispanic	41.92	47.90	41.36	84.81	73.95	51.00	12.82
Los Angeles County							
Total Population							
White, Non-Hispanic	65.19	68.03	67.43	77.63	73.13	54.59	21.35
Black, Non-Hispanic	36.07	33.82	35.34	87.25	79.02	40.72	11.92
Hispanic	35.53	39.72	35.73	86.48	77.78	43.70	12.36
Asian or Pacific Islander, Non-Hispanic	55.03	61.94	57.64	85.13	75.98	51.11	13.13
Native American, Non-Hispanic	48.40	50.70	48.58	81.04	75.36	45.88	17.68
Population below federal poverty line							
White, Non-Hispanic	53.66	60.62	59.62	83.19	78.51	56.98	18.46
Black, Non-Hispanic	24.12	28.03	26.41	88.34	81.07	36.90	11.74
Hispanic	25.05	33.70	29.50	89.09	80.94	44.63	10.63
Asian or Pacific Islander, Non-Hispanic	45.45	57.59	51.41	88.58	80.61	52.88	11.05
Native American, Non-Hispanic	33.63	39.10	36.05	84.43	78.22	47.65	16.22

Source: HUD AFFH Data, 2020.

Figure E- 24 shows the TCAC Opportunity Map for the region. High and highest resource areas are concentrated in the eastern County areas, from Beverly Hills to Calabasas, coastal areas, from the South Bay cities to Malibu, north San Gabriel Valley, and around Burbank. The central County areas are comprised of mostly low resource areas and areas of high segregation and poverty.

Local Trend. Opportunity Map scores for Culver City census tracts are presented in Table E- 16 and Figure E- 25. Nearly all tracts in the city are highest or high resource. In total, there

are six highest resource tracts, three high resource tracts, and one moderate resource tract in Culver City. Tracts in the central and eastern areas of the City are categorized as highest and high resource. One tract in the western corner on the City is considered moderate resource. There are no tracts in the City that are categorized as areas of high segregation and poverty. The moderate resource tract also contains block groups with higher concentrations of racial/ethnic minorities and LMI households (see Table E- 11 and Figure E-14). The individual scores for the domains described above (economic, environment, and education) are further detailed in the following sections.

Table E- 16: TCAC Opportunity Map Scores by Census Tract

Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Score	Final Category
6037702400	0.899	0.099	0.804	0.444	Highest Resource
6037702501	0.977	0.341	0.873	0.814	Highest Resource
6037702502	0.933	0.267	0.891	0.705	Highest Resource
6037702600	0.93	0.165	0.911	0.703	Highest Resource
6037702700	0.945	0.33	0.727	0.528	Highest Resource
6037702801	0.814	0.496	0.767	0.422	High Resource
6037702802	0.892	0.21	0.552	0.215	High Resource
6037702803	0.751	0.184	0.438	-0.032	Moderate Resource
6037703001	0.913	0.139	0.561	0.232	High Resource

Source: CA Fair Housing Task Force, HCD/TCAC Opportunity Maps, 2021.

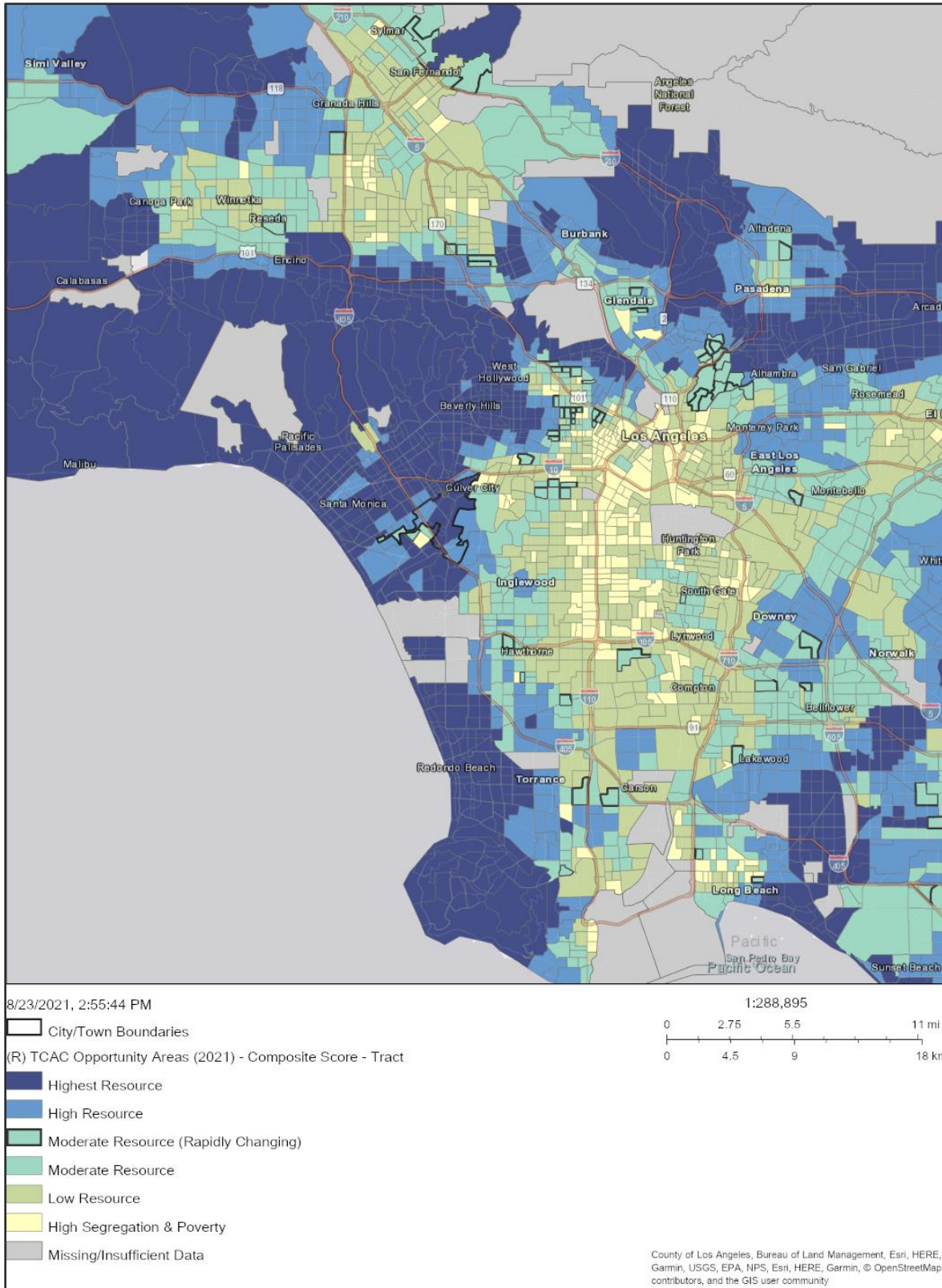
Sites Inventory. Figure E- 24 also includes the sites used to meet Culver City's 2021-2029 RHNA and Table E- 17 shows how those sites are distributed by TCAC opportunity score. As discussed previously, there is only one tract categorized as moderate resource in the City. Less than 6% of all RHNA units, including 1.9% of very low income units, 1.0% of low income units, 7.9% of moderate income units, and 6.5% of above moderate income units, are located in the moderate resource tract. Very low RHNA sites are evenly split between High and Highest Resource areas, although 2/3 of the low income units are in high resource tracts, compared to 1/3 in Highest Resource areas. For moderate and above moderate income units, the majority are in Highest Resource areas (54.8% and 50.3%, respectively). However, the discrepancies between very low income and moderate/above moderate income units are not particularly pronounced.

Table E- 17: Distribution of RHNA Units by TCAC Opportunity Score

TCAC Opportunity Area (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
Highest Resource	574	477	1,634	3,131	5,816
High Resource	645	1,034	1,214	2,209	5,102
Moderate Resource	24	15	245	369	653
Total	1,243	1,526	3,093	5,709	11,571
TCAC Opportunity Area (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
Highest Resource	46.2%	31.3%	52.8%	54.8%	50.3%
High Resource	51.9%	67.8%	39.2%	38.7%	44.1%
Moderate Resource	1.9%	1.0%	7.9%	6.5%	5.6%
Total	1,243	1,526	3,093	5,709	11,571

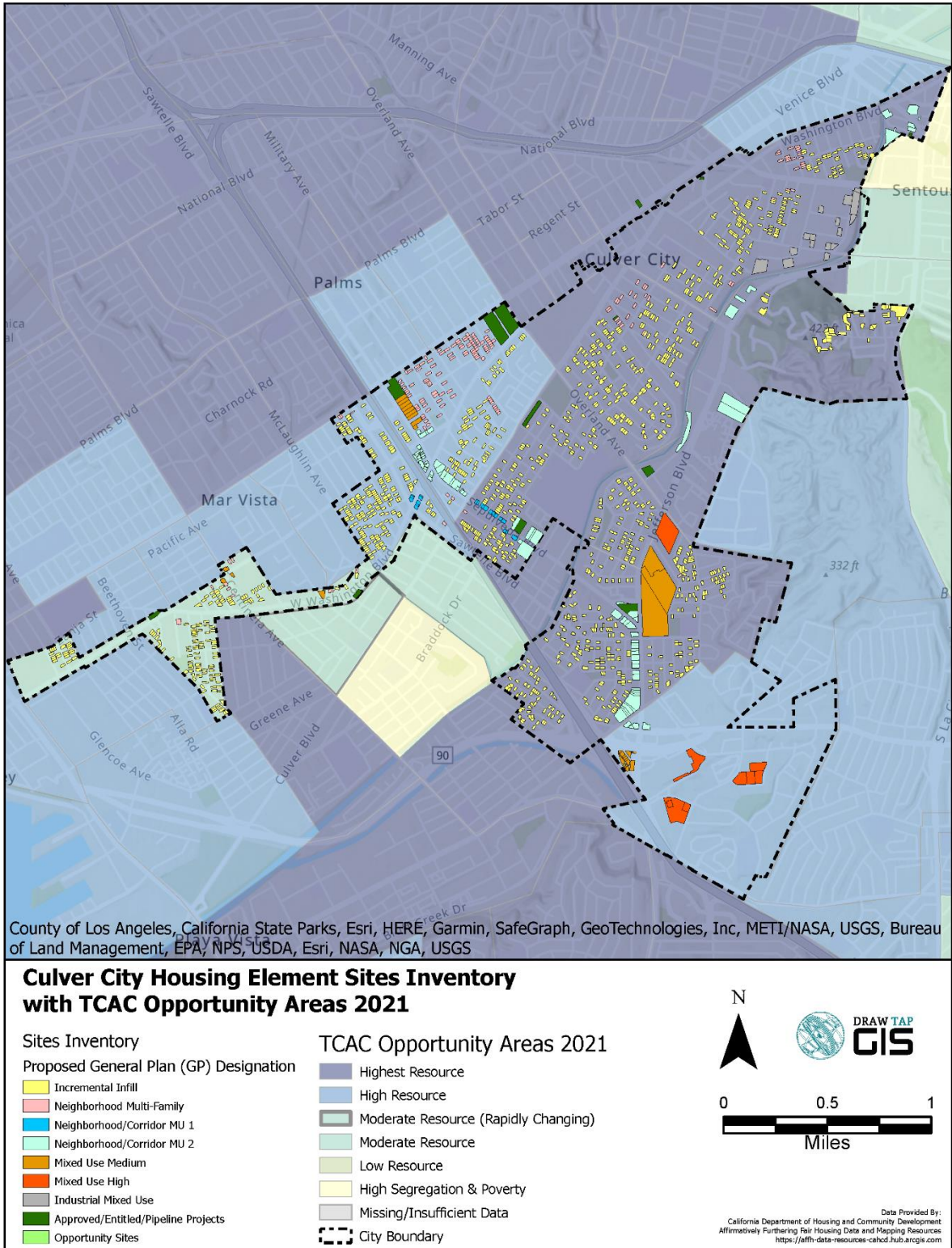
Note: The RHNA sites in this analysis include 1,246 Incremental Infill parcels that met the objective criteria for site selection.

Figure E- 24: Regional TCAC Opportunity Areas (Final Category)



Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

Figure E- 25: TCAC Opportunity Areas (Final Category) and Sites Inventory



Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 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. Refer to Table E- 14 for the complete list of TCAC Opportunity Map domains and indicators.

Regional Trend. Figure E- 26 shows TCAC economic scores by tract regionally. Culver City and the neighboring jurisdictions of Santa Monica and Beverly Hills are all comprised of tracts with economic scores in the highest quartile. Central Los Angeles County areas tend to have lower economic scores compared to coastal areas, northern San Gabriel Valley areas, and eastern San Fernando Valley areas. Areas surrounding Long Beach and most of the San Fernando Valley also have lower economic scores.

Local Trend. According to the 2021 Task Force maps presented in Figure E- 27, all of Culver City received economic scores in the highest quartile. Culver City scored similar to jurisdictions to the west and north, but higher than Los Angeles County areas to the east.

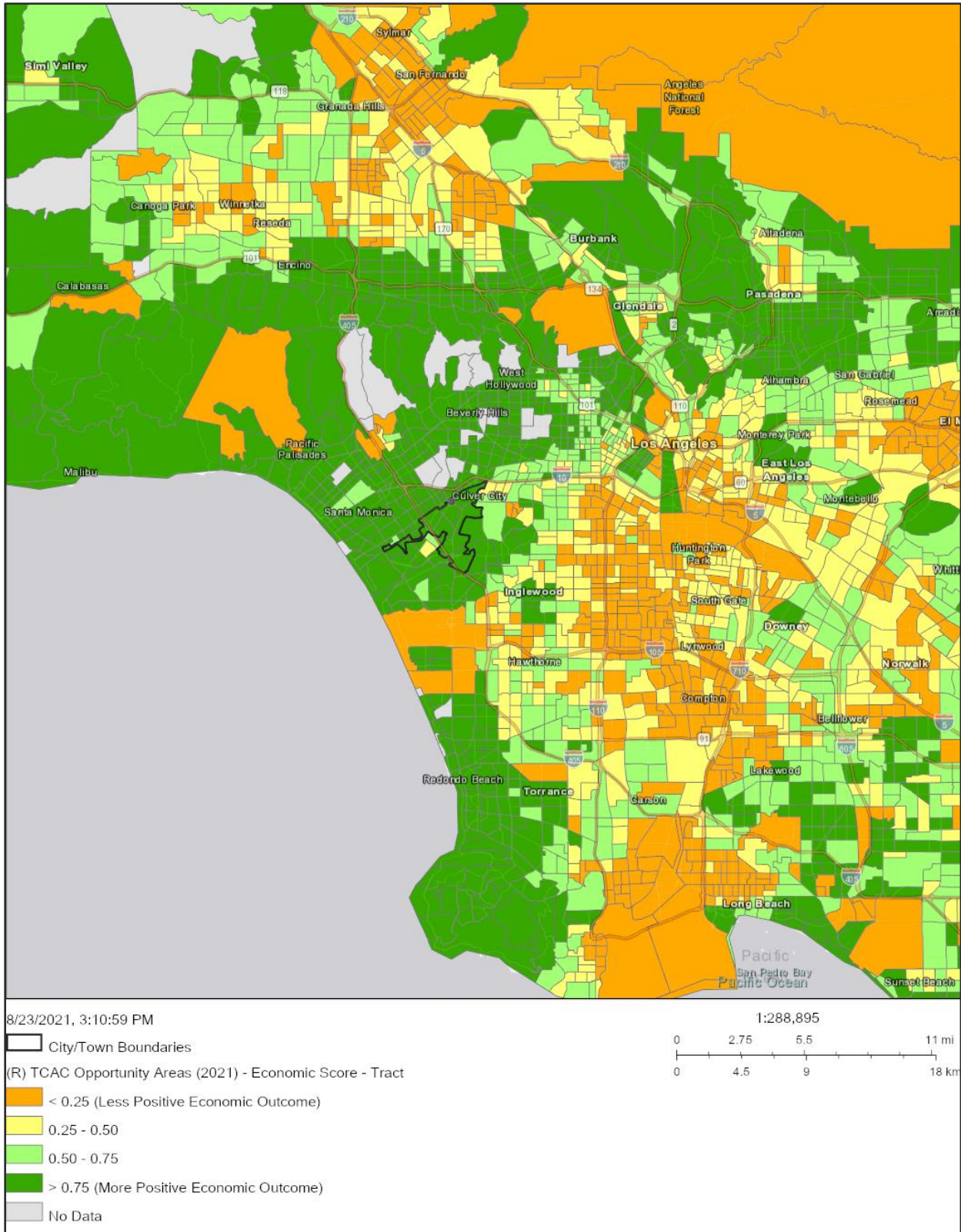
Education

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. Refer to Table E- 14 for the complete list of Opportunity Map domains and indicators.

Regional Trend. Regionally, education and economic scores follow a similar trend (Figure E- 28). Coastal cities, from the South Bay to Malibu, and areas around Burbank and Arcadia generally have the highest education scores in the County. The central County areas have a high concentration of tracts scoring in the lowest quartile for education.

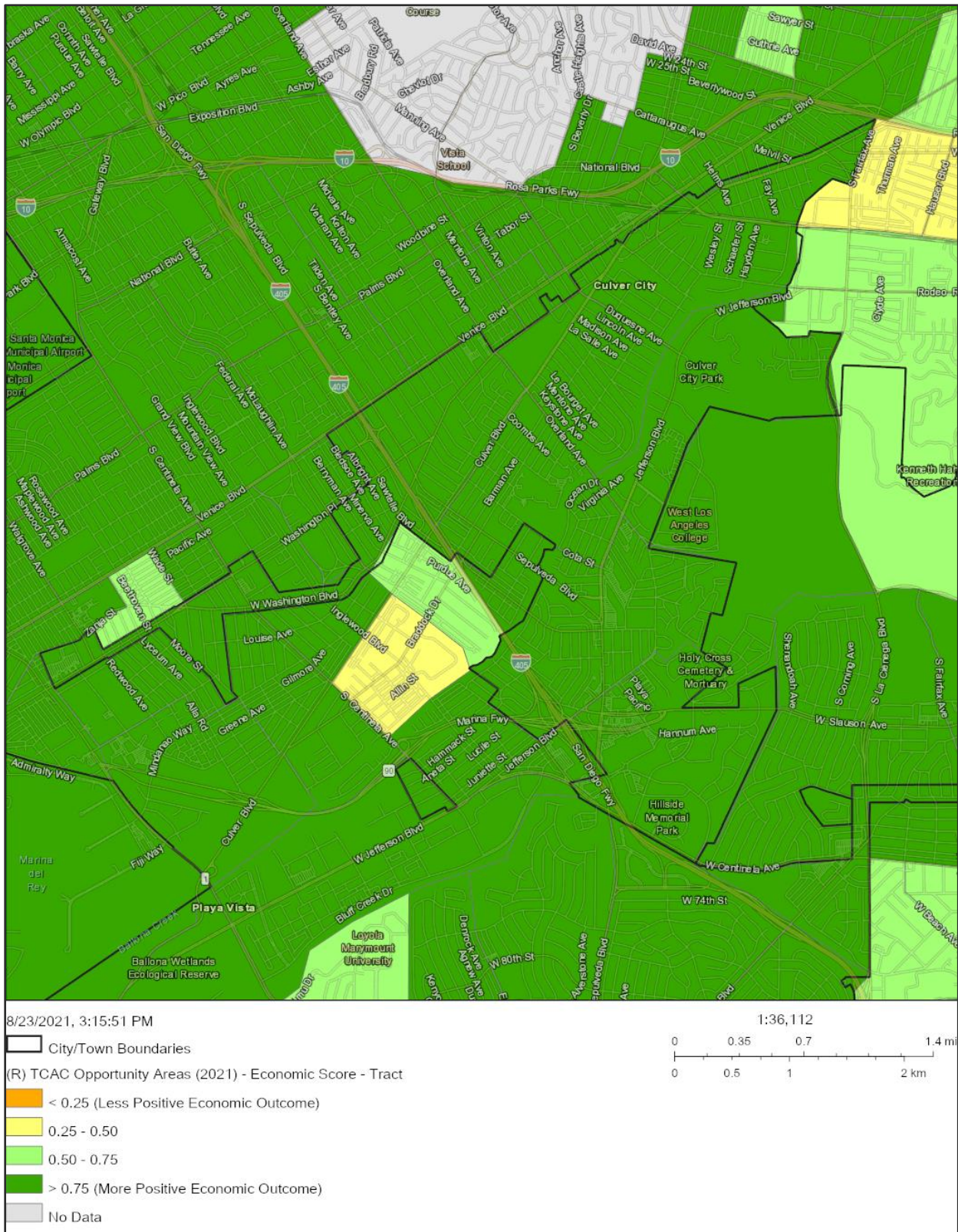
Local Trend. As shown in Figure E- 29, the tract in the western corner of the city received a lower education score than the rest of the city. The central, southern, and northeastern areas of the city received education scores of 0.50 and above. As described above, the tract on the western side of Culver City with a lower education score is also categorized as a moderate resource area (see Figure E- 25).

Figure E- 26: Regional TCAC Economic Scores



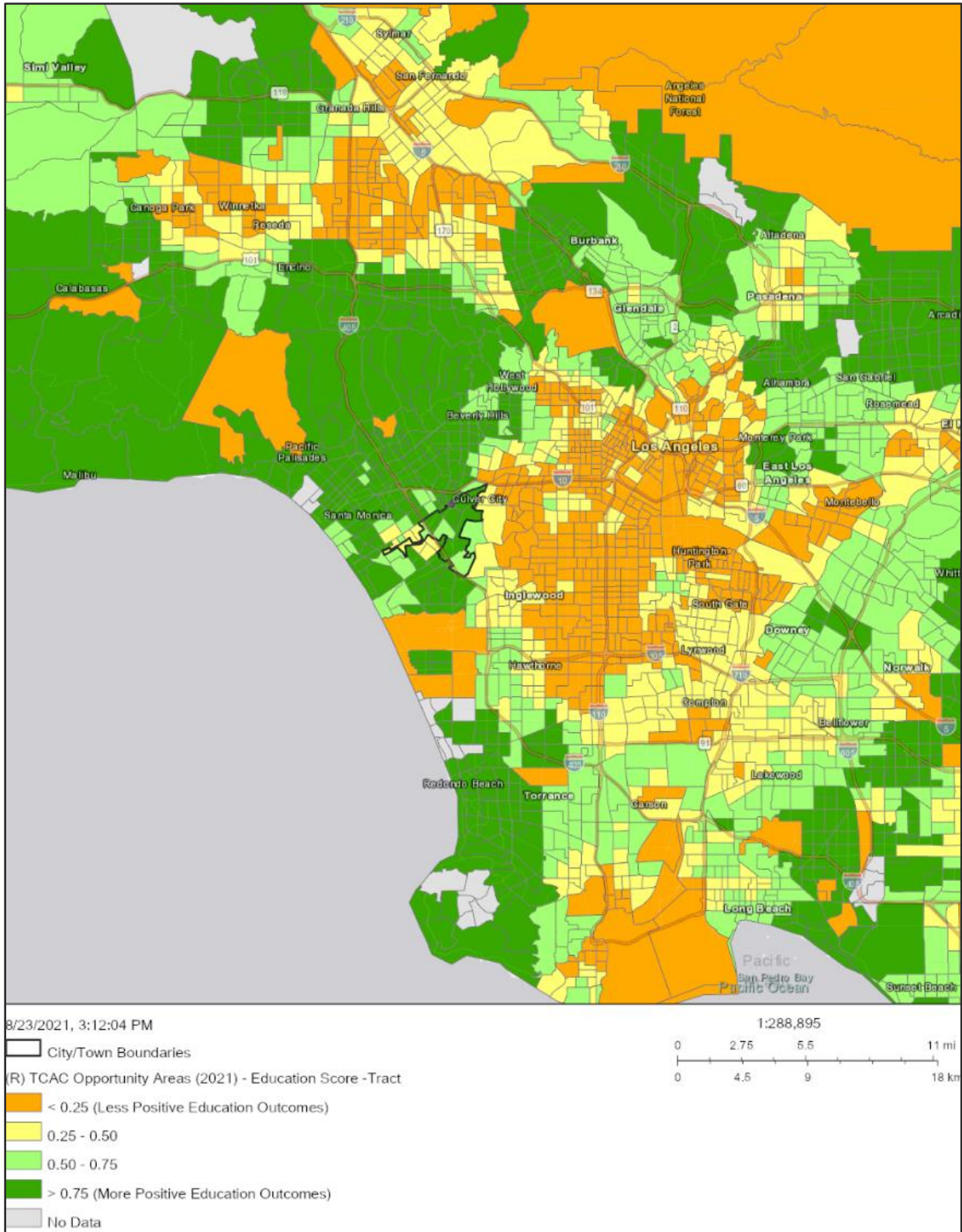
Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

Figure E- 27: TCAC Economic Scores



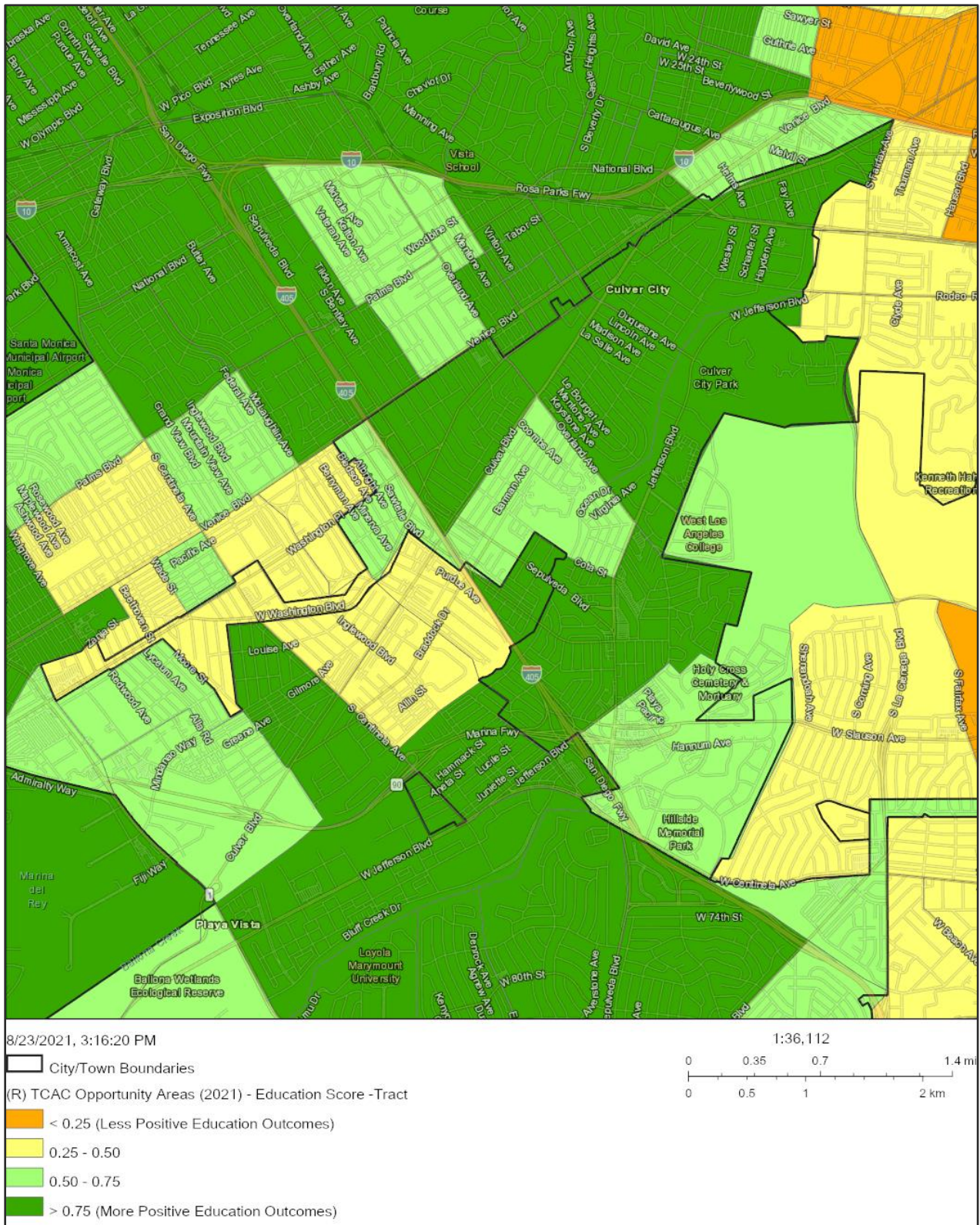
Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

Figure E- 28: Regional TCAC Education Scores



Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

Figure E- 29: TCAC Education Scores



Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

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 environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (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. Refer to Table E- 14 for the complete list of Opportunity Map domains and indicators.

Regional Trend. Figure E- 30 shows TCAC environmental scores by tract regionally. There are more tracts in the County that scored in the lowest quartile for environmental scores compared to economic and education scores. Areas around Inglewood, Malibu, Rancho Palos Verdes, Redondo Beach, Altadena, and Long Beach have the highest concentration of tracts with environmental scores in the highest quartile.

Local Trend. Figure E- 31 shows that tracts in the northeastern, southern, and western corners of Culver City received environmental scores in the lowest quartile. All tracts in Culver City scored below 0.50, indicating less positive environmental outcomes. These areas also have higher concentrations of racial/ethnic minorities. As described above, the tract in the western corner of the City also received lower education scores and is considered a moderate resource area (see Figure E- 25 and Figure E- 29). Despite the low environmental scores citywide, most tracts in Culver City are categorized as high and highest resource.

CalEnviroScreen 4.0 scores are shown in Figure E- 32. CalEnviroScreen 4.0 is the OEHHA's most updated California Communities Environmental Health Screening Tool used to identify communities that are disproportionately burdened by multiple sources of pollution. CalEnviroScreen 4.0 scores are based on percentiles; lower percentile scores mean better environmental conditions. Most tracts scored in the 50th percentile or higher. One tract in the northeastern area of the city scored between the 31st and 40th percentile. The western tract scored in the highest percentile in the city (between the 71st and 80th percentile). As discussed previously, this tract also has a lower education score and is considered a moderate resource area (see Figure E- 25 and Figure E- 29).

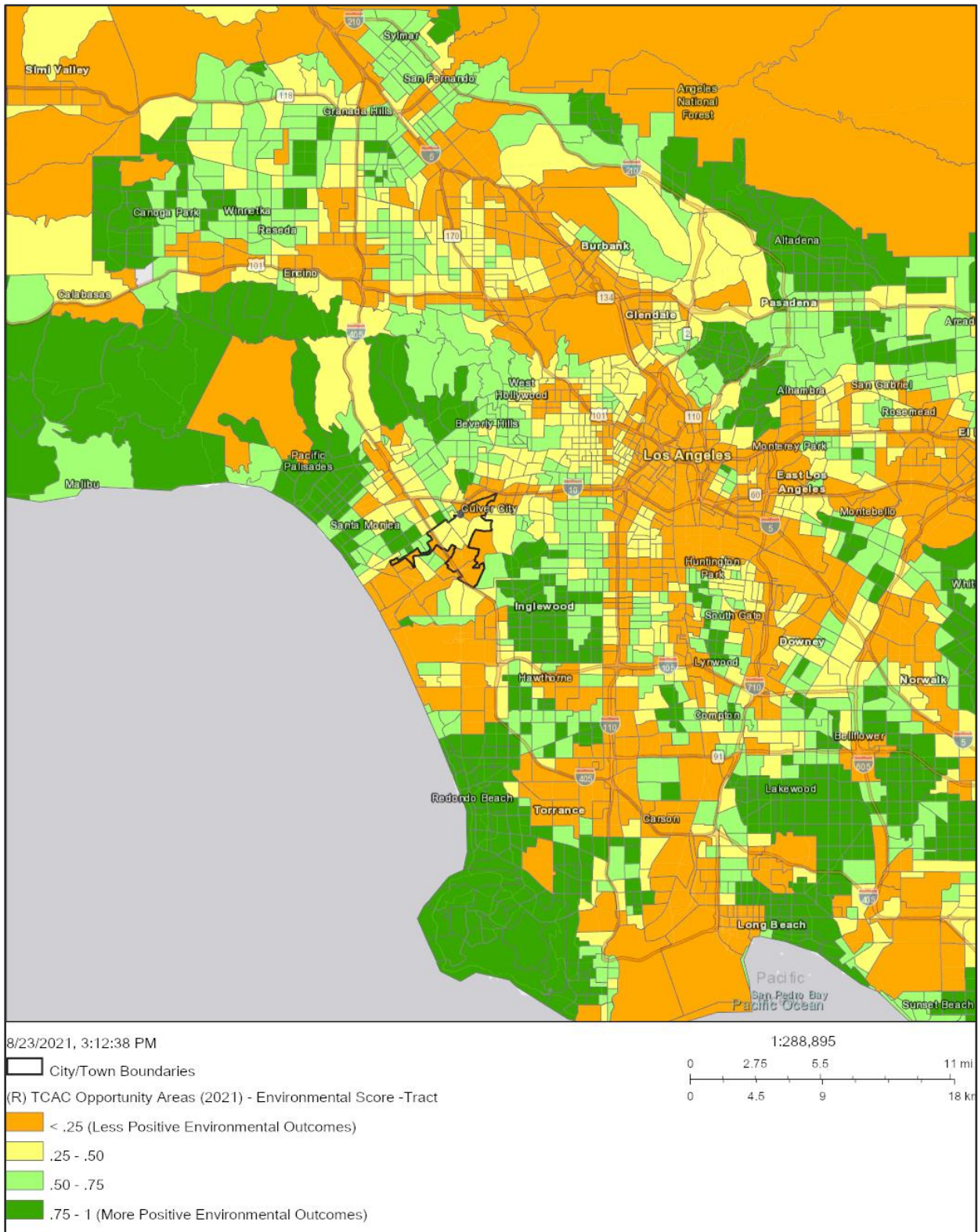
Sites Inventory. Figure E- 32 also shows the sites inventory used to meet the City's 2021-2029 RHNA. Sites are generally distributed throughout the city. As presented in Table E- 18, about 55% of RHNA units are in tracts that scored in the 61st to 70th CalEnviroScreen 4.0 percentile. Overall, more moderate and above moderate income sites are located in lower CalEnviroScreen scores than lower income units. Therefore, there is not a disproportionate concentration of lower income units in areas with potential environmental hazards.

Table E- 18: Distribution of RHNA Units by CalEnviroScreen 4.0 Score

CalEnviroScreen 4.0 Percentile (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
31-40%	0	0	269	358	627
41-50%	226	136	314	446	112
51-60%	435	449	576	1,374	2,834
61-70%	558	926	1,689	3,162	6,335
71-80%	24	15	245	369	653
Total	1,243	1,526	3,093	5,709	11,571
CalEnviroScreen 4.0 Percentile (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
31-40%	0.0%	0.0%	8.7%	6.3%	5.4%
41-50%	18.2%	8.9%	10.2%	7.8%	1.0%
51-60%	35.0%	29.4%	18.6%	24.1%	24.5%
61-70%	44.9%	60.7%	54.6%	55.4%	54.7%
71-80%	1.9%	1.0%	7.9%	6.5%	5.6%
Total	1,243	1,526	3,093	5,709	11,571

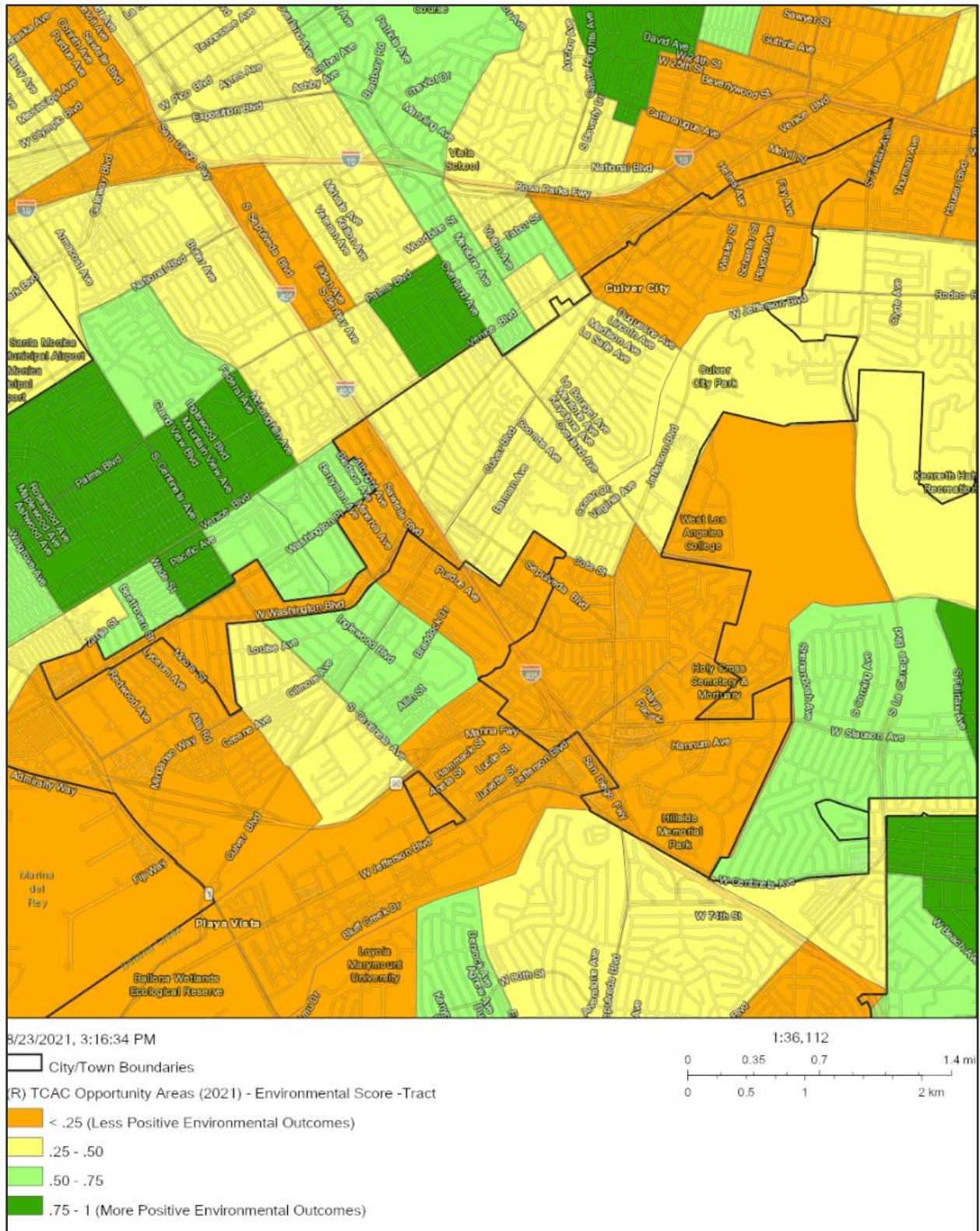
Note: The RHNA sites in this analysis include 1,246 Incremental Infill parcels that met the objective criteria for site selection.

Figure E- 30: Regional TCAC Environmental Scores



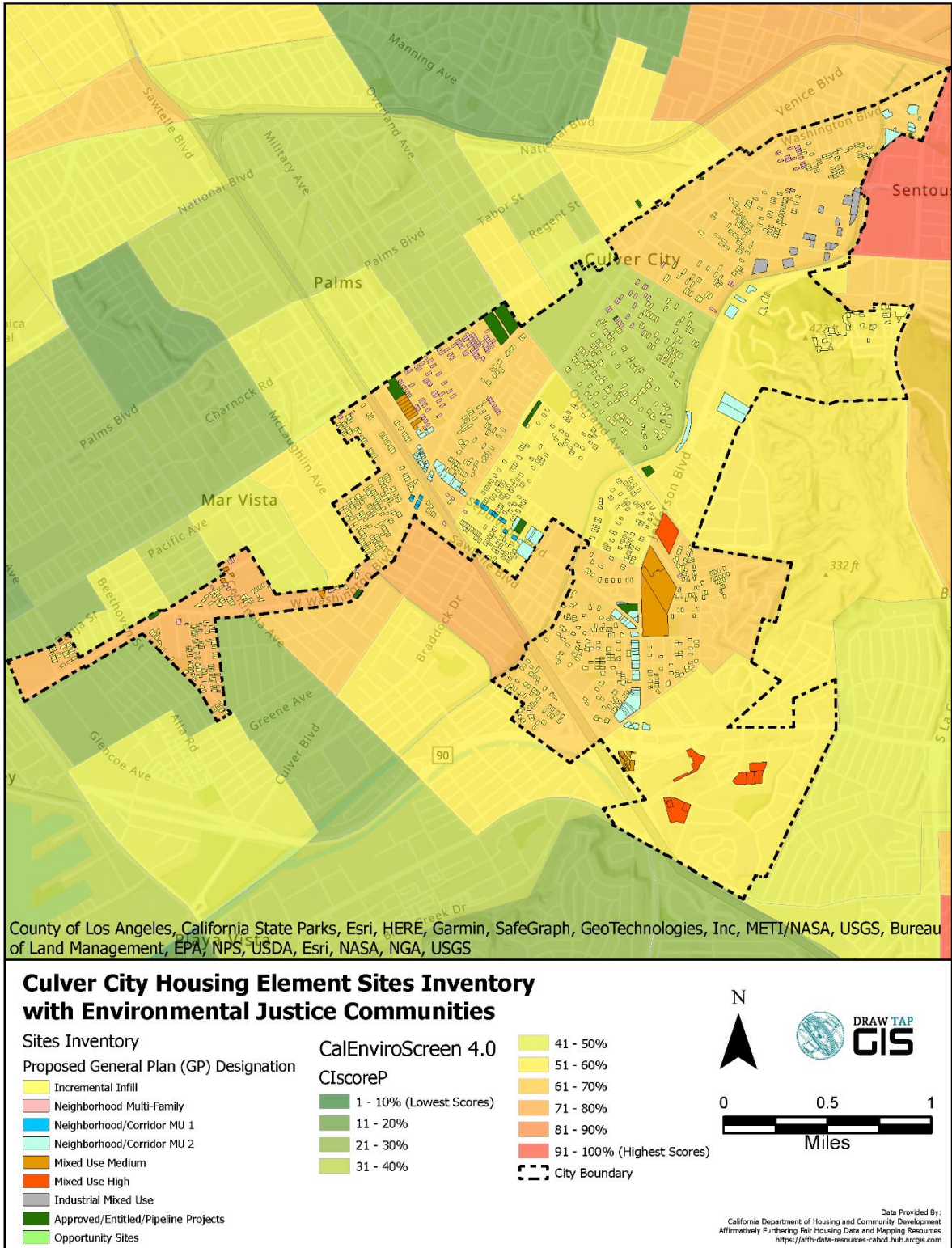
Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

Figure E- 31: TCAC Environmental Scores



Source: HCD AFFH Data Viewer (2021 HCD/TCAC Opportunity Map), 2021.

Figure E- 32: CalEnviroScreen 4.0 Scores and RHNA Sites



Source: HCD AFFH Data Viewer (CalEnviroScreen 4.0, 2021), 2021.

Transportation

HUD's Job Proximity Index, shown in Table E- 15 previously, can be used to show transportation need geographically. The Job's Proximity Index calculates how accessible a given residential neighborhood is based on its distance to all job locations within a Core Based Statistical Areas (CBSA). It applies more weight to larger employment centers. 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 (HQTA) as part of the Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). SCAG defines HQTAs 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 Culver City.

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.⁵ Culver City's All Transit Performance score of 8.8 is higher than the surrounding jurisdictions of Beverly Hills (8.2), Hawthorne (7.3), Inglewood (7.7), Santa Monica (8.8), West Hollywood (8.7), the City of Los Angeles (7.7), and the County (6.8). The County's score of 6.8 indicates a moderate combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work. Countywide, 6.7% of commuters use transit.

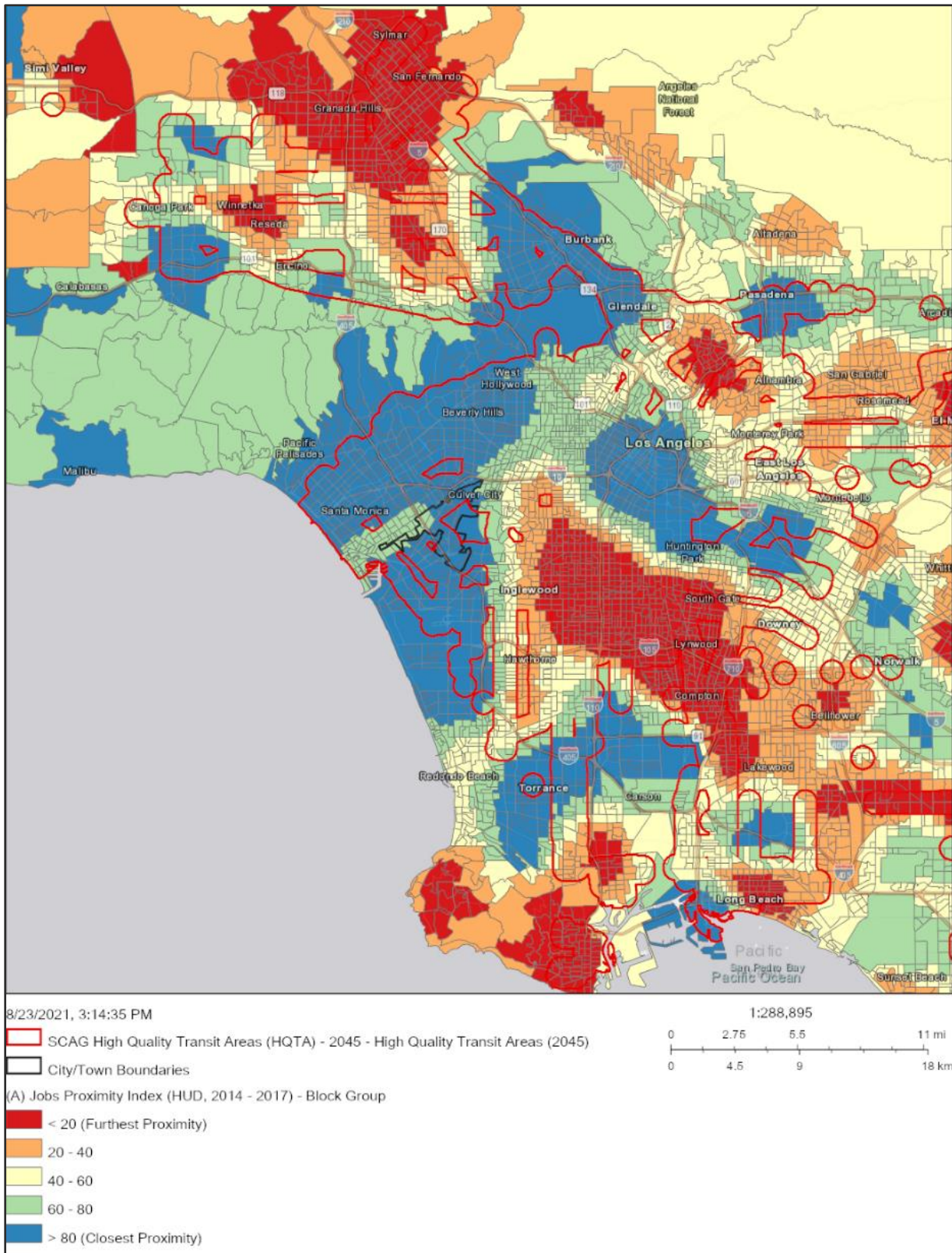
As shown in Figure E- 33, block groups around Santa Monica/Beverly Hills, Glendale/Burbank, Torrance, downtown Los Angeles, and coastal areas around El Segundo have the highest jobs proximity index scores indicating there are accessible employment opportunities in those areas. Central County areas, from 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.

Local Trend. The City's All Transit score of 8.8 illustrates an "excellent" combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work. Culver City has a lower proportion of households with commuters that use transit (3.4%) than the County (6.7%).

HUD's Job Proximity Index, described previously, 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. As shown in Figure E- 34, employment opportunities are very accessible for most block groups in the City. Block groups in the northeastern, central, and southern sections of the City are located closest to employment opportunities. Employment opportunities are slightly less accessible in the western corner of the City. This area also received lower education and environmental scores and is considered a moderate resource area (see Figure E- 25, Figure E- 29, and Figure E- 31). Almost all of Culver City is considered an HQTA.

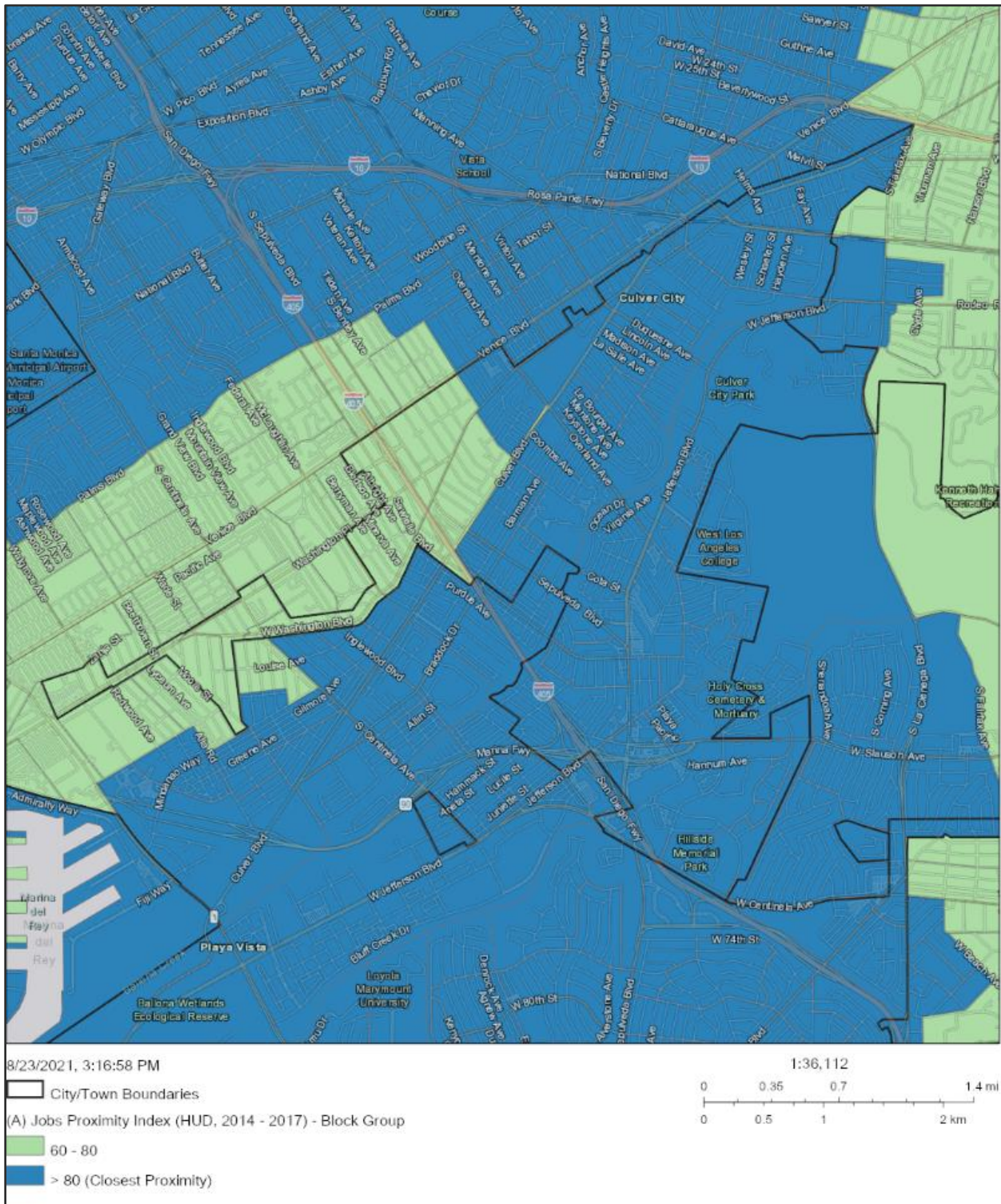
⁵AllTransit. 2019 Metrics: AllTransit Performance Score. <https://alltransit.cnt.org/>. Accessed July 2021.

Figure E- 33: Regional Jobs Proximity Indices and HQTAS



Source: HCD AFFH Data Viewer (HUD, 2014-2017), 2021; SCAG 2045 HQTAs, 2021.

Figure E- 34: Jobs Proximity Index by Block Group



Source: HCD AFFH Data Viewer (HUD, 2014-2017), 2021.

Disproportionate Housing Needs

Housing problems in Culver City were calculated using HUD's 2020 Comprehensive Housing Affordability Strategy (CHAS) data based on the 2013-2017 ACS. Table E- 19 breaks down households by race and ethnicity and presence of housing problems for Culver City and Los Angeles County households. The following conditions are considered housing problems:

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

In Culver City, 35.6% of owner-occupied households and 49.1% of renter-occupied households have one or more housing problem. The City has a lower proportion of households with a housing problem compared to the County, where 38.9% of owner-occupied households and 62.3% of renter-occupied households experience a housing problem. In Culver City, Hispanic renter-occupied households and Black owner-occupied households have the most housing problems. Approximately 59% of Black owner-occupied households and 65% of Hispanic renter-occupied households experience a housing problem.

Among different household types, senior renter-households and large renter-households have the highest incidence of housing problems, compared to other household types. Senior renter-households in particular, are impacted by cost burden.

Table E- 19: Housing Problems by Race/Ethnicity and Household Type

With Housing Problem	White	Black	Asian	Am. Indian	Pac. Islr.	Hispanic	Other	All
Culver City								
Owner-Occupied	32.2%	59.2%	31.9%	0.0%	--	43.9%	30.0%	35.6%
Renter-Occupied	42.1%	50.0%	46.3%	--	--	64.5%	34.2%	49.1%
Los Angeles County								
Owner-Occupied	32.1%	41.5%	38.3%	39.7%	39.7%	48.2%	36.5%	38.9%
Renter-Occupied	52.6%	63.7%	56.3%	56.4%	55.5%	71.1%	55.7%	62.3%

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

Household by Type, Income, & Housing Problem	Elderly	Small Related	Large Related	All	Total	Elderly	Small Related	Large Related	All	Total	Total
	1 & 2	(2 to 4)	(5 or more)	Other	Renters	1 & 2	(2 to 4)	(5 or more)	Other	Owners	Households
	member			Households		member			Households		
	households					households					
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(L)
1. Household Income <=50% MFI	765	395	20	775	1,955	825	260	0	195	1,300	3,255
2. Household Income <=30% MFI	530	220	20	390	1,160	410	140	0	135	685	1,845
3. % with any housing problems	385	200	20	315	920	335	120	0	60	515	1,435
4. % Cost Burden >30%	385	195	20	300	900	340	120	0	60	520	1,420
5. % Cost Burden >50%	335	195	20	300	850	300	120	0	60	480	1,330
6. Household Income >30% to <=50% MFI	235	175	0	385	795	415	120	0	60	615	1,410
7. % with any housing problems	210	175	0	385	770	170	80	4	60	314	1,084
8. % Cost Burden >30%	210	155	0	385	750	170	120	0	65	355	1,105
9. % Cost Burden >50%	135	70	0	385	590	40	120	0	55	215	805
10. Household Income >50 to <=80% MFI	90	455	90	335	970	470	320	70	105	970	1,940
11. % with any housing problems	40	350	90	310	790	205	255	70	65	595	1,385
12. % Cost Burden >30%	40	355	70	310	775	200	255	35	65	555	1,330
13. % Cost Burden >50%	40	60	0	130	230	105	135	35	0	275	505
14. Household Income >80% MFI	185	2,130	125	1,970	4,410	1,940	3,525	280	835	6,580	10,990
15. % with any housing problems	140	520	100	455	1,215	435	945	95	310	1,785	3,000
16. % Cost Burden >30%	115	295	0	395	805	430	905	45	310	1,690	2,495
17. % Cost Burden >50%	15	30	0	10	55	120	200	20	100	440	495
18. Total Households	1,040	2,980	235	3,080	7,555	3,235	4,105	350	1,135	8,945	16,500
19. % with any housing problems	775	1,245	210	1,465	3,695	1,145	1,400	169	495	3,209	6,904
20. % Cost Burden >30	750	1,000	90	1,390	3,230	1,140	1,400	80	500	3,120	6,350
21. % Cost Burden >50	525	355	20	825	1,725	565	575	55	215	1,410	3,135

Source: HUD CHAS Data (based on 2014-2018 ACS), 2021.

Cost Burden

Households are considered cost burdened if they pay 30% or more of their gross income in housing costs, and severely cost burdened if they pay 50% or more of their gross income in housing costs.

Regional Trend. Cost burden by tenure for Los Angeles County based on HUD CHAS data is shown in Table E- 20. Approximately 45.4% of Los Angeles County households are cost burdened, including 35% of owner-occupied households and 54.2% of renter-occupied households. Non-Hispanic Black and Hispanic renter households have the highest rate of cost burden of 59.6% and 58.3%, respectively. Non-Hispanic White and non-Hispanic Pacific Islander owner households have the lowest rate of cost burden of 31.1% and 33.3%, respectively. Cost burden is more common amongst renter households than owner households regardless of race or ethnicity.

Table E- 20: Cost Burden by Race/Ethnicity - Los Angeles County

Race/Ethnicity	Cost Burden (>30%)	Severe Cost Burden (>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
Amer. Ind, non-Hispanic	36.9%	16.3%	3,215
Pacific Islr., 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
Amer. Ind, non-Hispanic	48.8%	26.8%	4,420
Pacific Islr., 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. As presented in Table E- 20, Black owner households and Hispanic renter households in Culver City have the highest rate of cost burden in the City (58.5% and 58.2%, respectively). Cost burden amongst owner-households is lower than renter-households for all racial/ethnic groups other than Black households. None of the 15 American Indian owner-occupied households are cost burdened. White owner households, Asian owner households, and “other” renter households are the least cost burdened racial/ethnic groups. Overall, 37.6% of households in Culver City are cost burdened, including 33.4% of owner-occupied households and 42.5% of renter-occupied households. Cost burden is less common in Culver City than throughout the County.

Figure E- 35 compares cost burdened owner households using the 2010-2014 and 2015-2019 ACS. The proportion of cost burdened homeowners has decreased since the 2010-2014 ACS, specifically in tracts along the northwest City boundary. Only 20-40% of owners in these tracts experience cost burden, compared to 40-60% throughout the rest of the City.

Cost burden trends for renter-occupied households is shown in Figure E- 36. Since the 2010-2014 ACS, the proportion of cost burdened renters has fluctuated throughout the City. Two tracts in the western corner of the City saw the proportion of cost burdened renters increase from 40-60% to 60-80%. These tracts also have higher concentrations of racial/ethnic minorities and LMI households and one is categorized as moderate resource (see Figure E- 2, Figure E- 14, and Figure E- 25). However, several tracts in the central and southern areas of the City saw a decrease in cost burdened renters.

Table E- 21: Cost Burden by Race/Ethnicity - Culver City

Race/Ethnicity	Cost Burden (>30%)	Severe Cost Burden (>50%)	Total Households
Owner-Occupied			
White, non-Hispanic	31.3%	15.2%	5,605
Black, non-Hispanic	58.5%	21.8%	735
Asian, non-Hispanic	26.7%	10.7%	1,350
Amer. Ind, non-Hispanic	0.0%	0.0%	15
Hispanic	36.4%	8.1%	990
Other	33.3%	13.3%	150
Renter-Occupied			
White, non-Hispanic	36.8%	19.5%	3,410
Black, non-Hispanic	42.6%	28.7%	680
Asian, non-Hispanic	34.4%	12.4%	1,295
Hispanic	58.2%	31.5%	2,045
Other	30.9%	3.6%	275

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

Sites Inventory. Figure E- 35 and Figure E- 36 also show the sites inventory used to meet the City's 2021-2029 RHNA. All RHNA units are in tracts where 20% to 60% of owners overpay for housing. Areas of 40-60% owners with cost burden are generally where lower density, single-family homes are located. It is not uncommon that higher income households spend more than 30% of their income on homes. Generally, that is not an affordability issue.

A larger proportion of lower income units are in tracts where 40-60% of owners are cost burdened compared to moderate and above moderate income units. Slightly more than half of low, moderate, and above moderate income units are in tracts where more than 40% of owners are cost burdened compared to 75% of very low income units. Future ownership housing opportunities in Culver City are likely to be multi-family townhomes and condominiums. Expanding ownership housing along transportation and commercial corridors is a key strategy for providing workforce housing and entry level homeownership in the community.

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

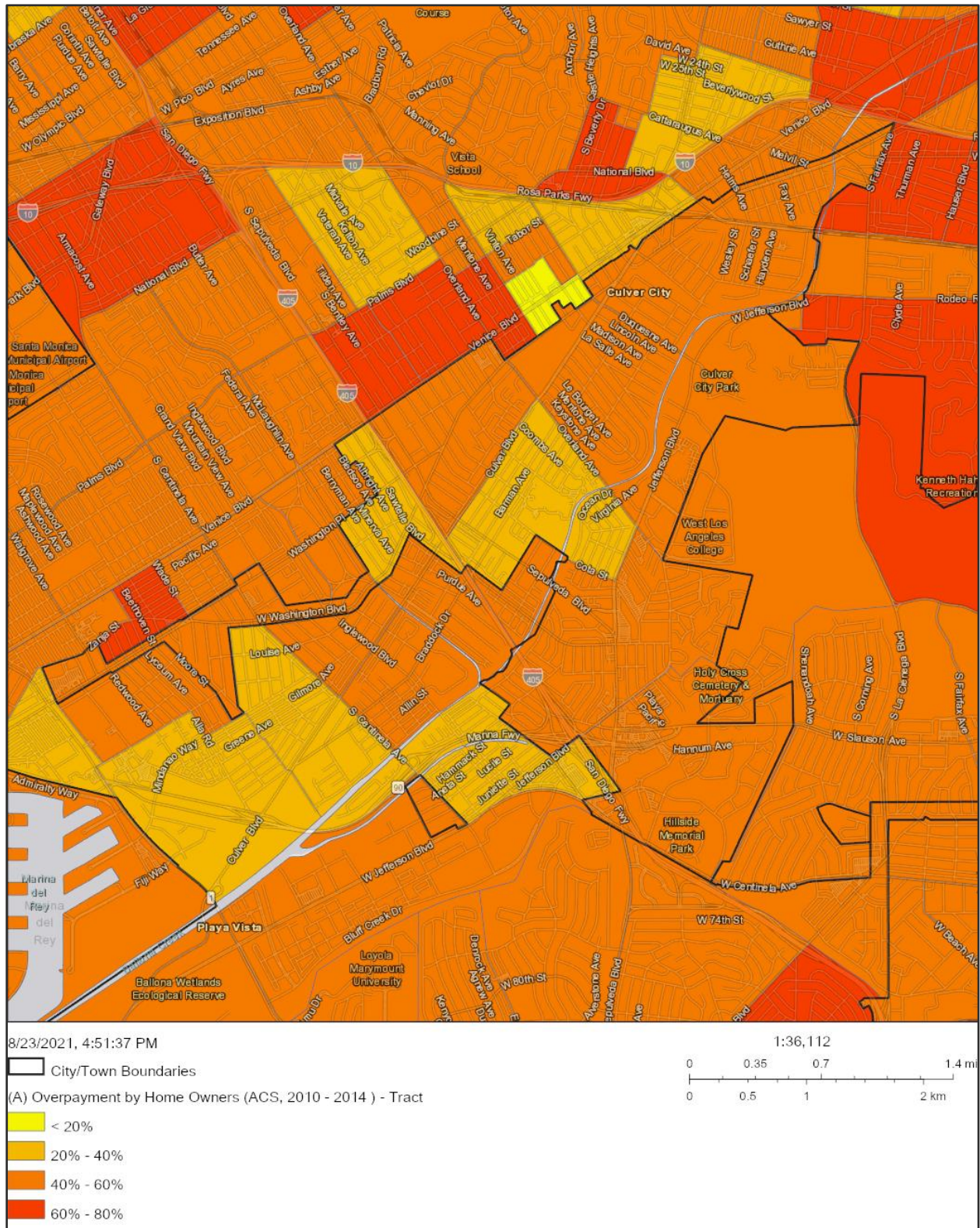
Overpaying Owners (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
20-40%	314	700	1,511	2,790	5,315
40-60%	929	826	1,582	2,919	6,256
Total	1,243	1,526	3,093	5,709	11,571
Overpaying Owners (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
20-40%	25.3%	45.9%	48.9%	48.9%	45.9%
40-60%	74.7%	54.1%	51.1%	51.1%	54.1%
Total	1,243	1,526	3,093	5,709	11,571

Approximately half of the units used to meet the RHNA are in tracts where 40-60% of renters overpay for housing. There are more lower income units in tracts where less than 40% of renter overpay compared to moderate and above moderate income units. It is logical that cost-burdened renters would be concentrated in areas with multi-family housing. Introducing additional housing in these areas, with the City's inclusionary housing program, would expand the housing supply and therefore ease the pressure for price escalation to some degree.

Table E- 23: Distribution of RHNA Units by Percent of Cost Burdened Renters

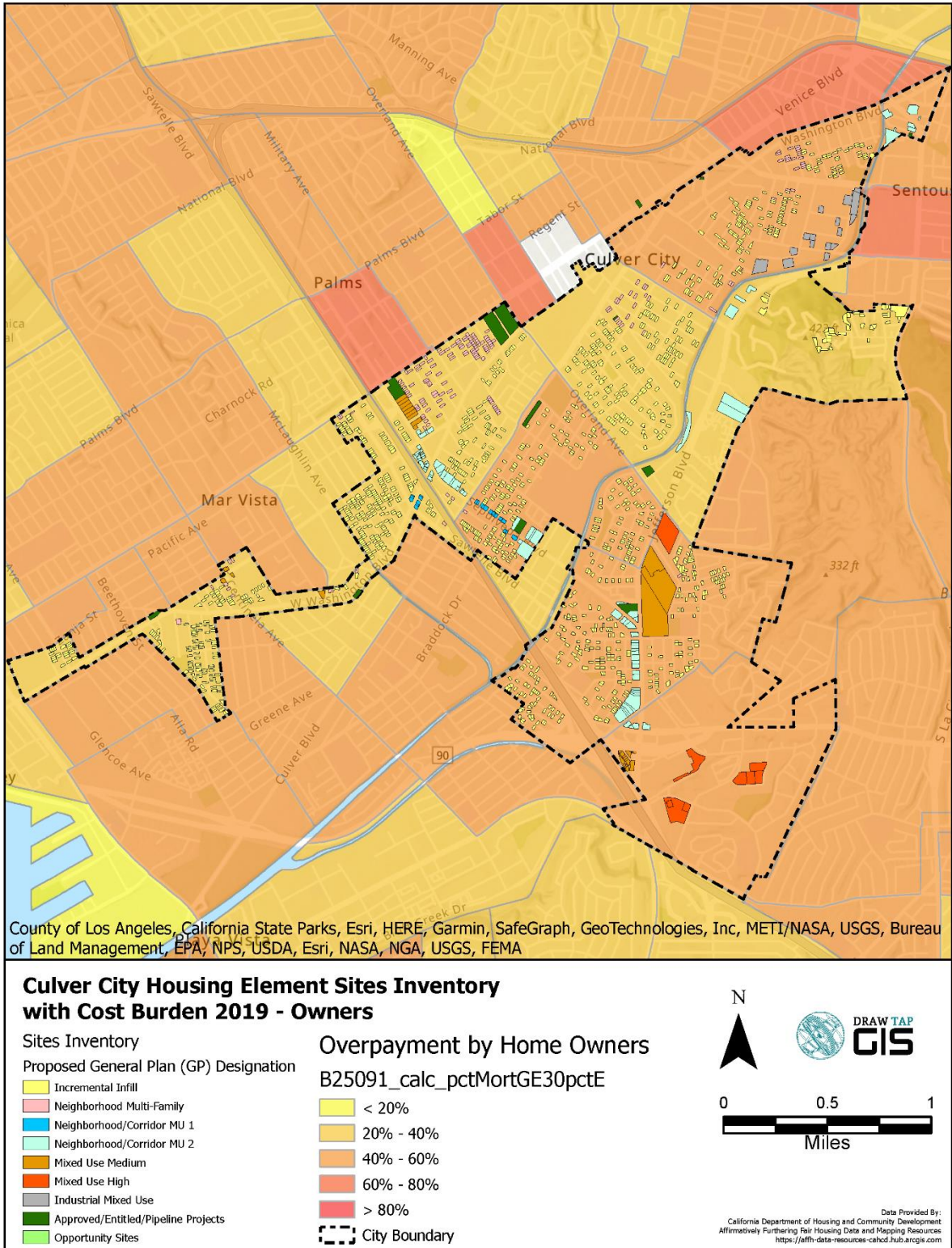
Overpaying Renters (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
20-40%	395	393	560	948	2,296
40-60%	574	477	1,576	3,113	5,740
60-80%	274	656	957	1,648	3,535
Total	1,243	1,526	3,093	5,709	11,571
Overpaying Renters (Tract)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
20-40%	31.8%	25.8%	18.1%	16.6%	19.8%
40-60%	46.2%	31.3%	51.0%	54.5%	49.6%
60-80%	22.0%	43.0%	30.9%	28.9%	30.6%
Total	1,243	1,526	3,093	5,709	11,571

Figure E- 35: (A) Overpayment by Homeowners (2010-2014)



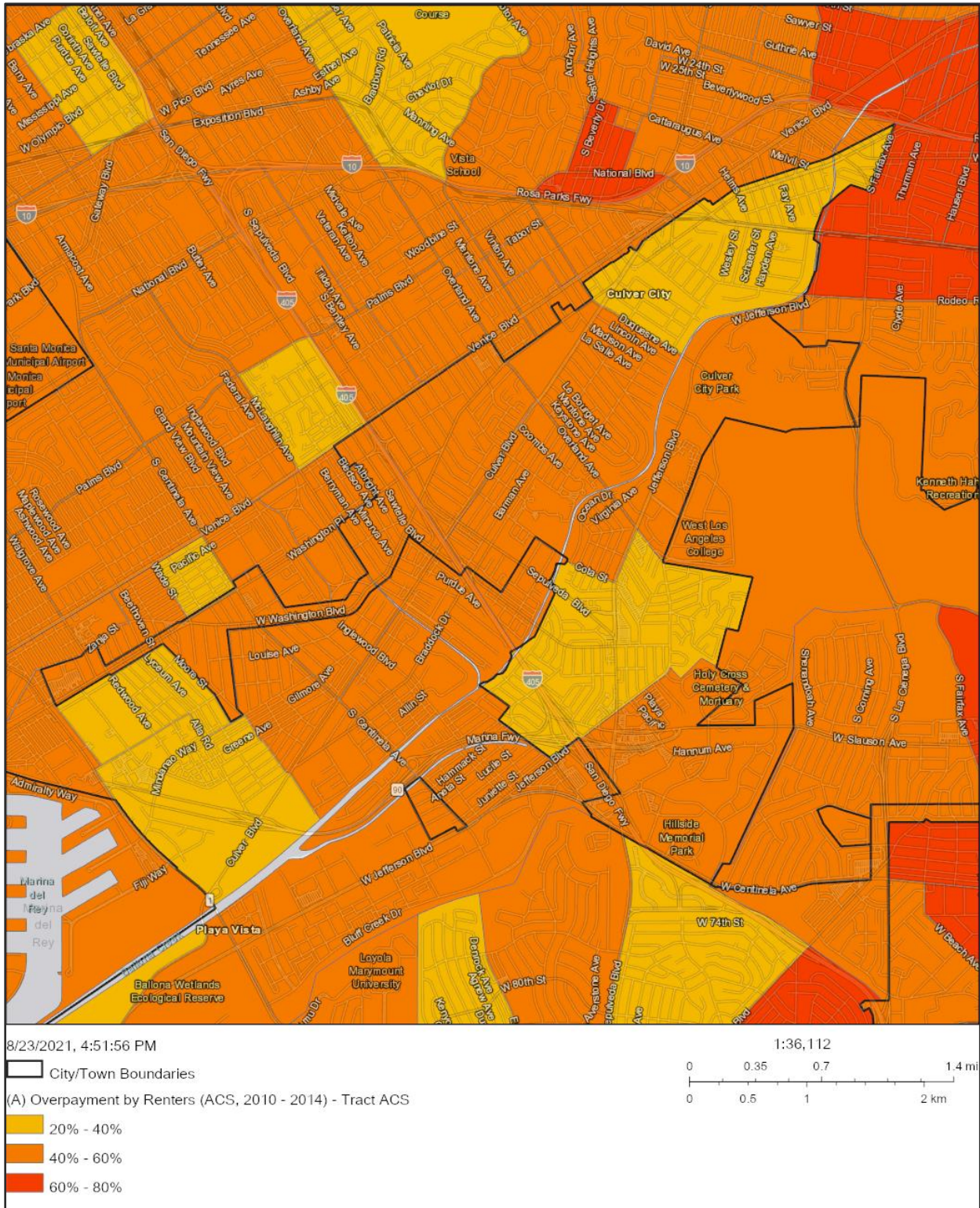
Source: HCD AFFH Data Viewer (2010-2014 and 2015-2019 ACS), 2021.

Figure E- 30: (B) Overpayment by Homeowners (2015-2019)



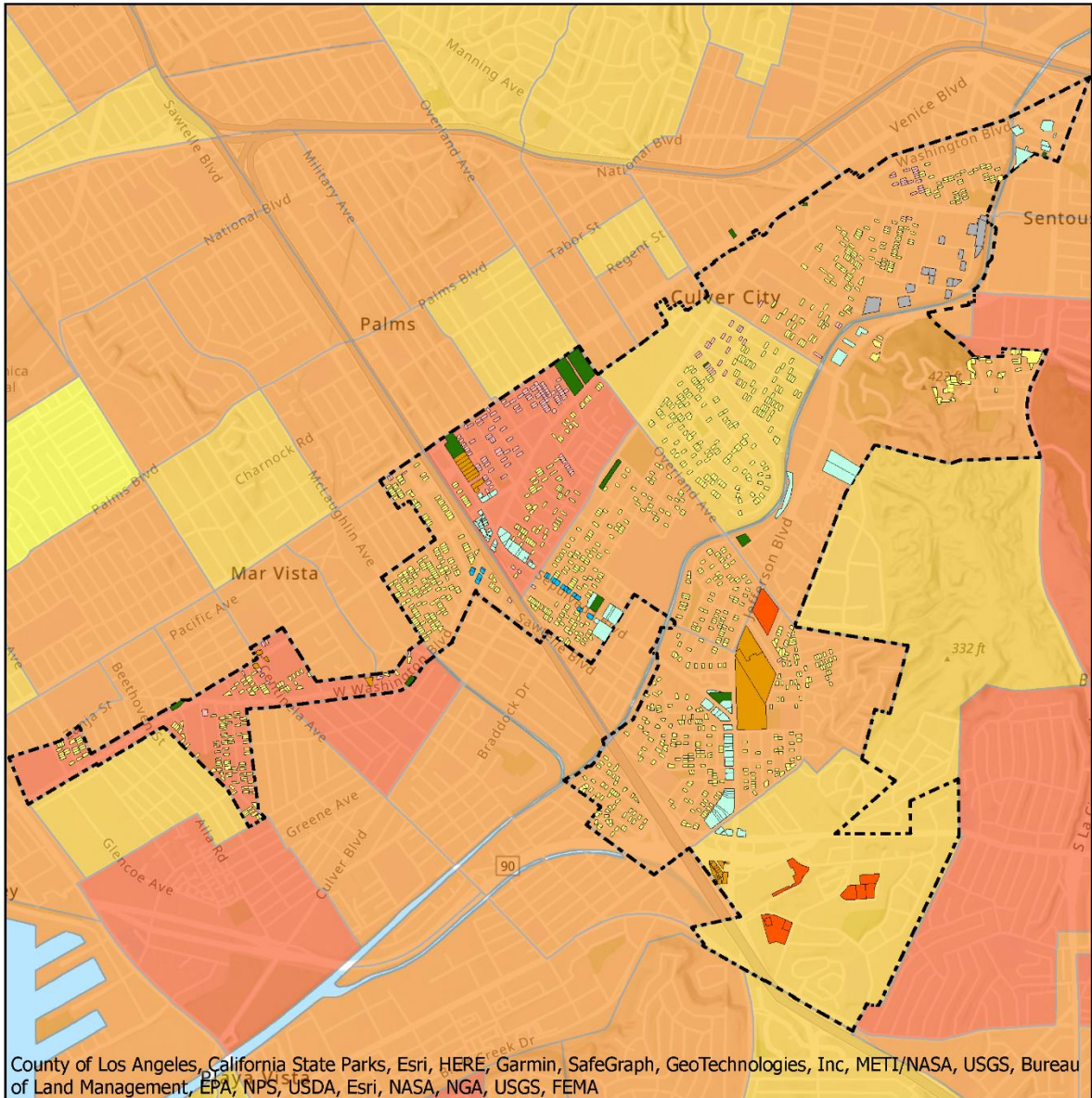
Source: HCD AFFH Data Viewer (2010-2014 and 2015-2019 ACS), 2021.

Figure E- 36: (A) Overpayment by Renters (2010-2014)



Source: HCD AFFH Data Viewer (2010-2014 and 2015-2019 ACS), 2021.

Figure E- 31: Overpayment by Renters (2015-2019)



Culver City Housing Element Sites Inventory with Cost Burden 2019 - Renters

Sites Inventory

Proposed General Plan (GP) Designation

- Incremental Infill
- Neighborhood Multi-Family
- Neighborhood/Corridor MU 1
- Neighborhood/Corridor MU 2
- Mixed Use Medium
- Mixed Use High
- Industrial Mixed Use
- Approved/Entitled/Pipeline Projects
- Opportunity Sites



Overpayment by Renters

B25070_calc_pctGE30pctE

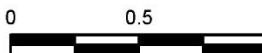
- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

City Boundary

N

0 0.5 1



Miles

Data Provided By:
California Department of Housing and Community Development
Affirmatively Furthering Fair Housing Data and Mapping Resources
<https://affh-data-resources.ca-hud.hub.arcgis.com>

Source: HCD AFFH Data Viewer (2010-2014 and 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 is used to show overcrowding in Culver City and Los Angeles County.

Regional Trend. As shown in Table E- 24, approximately 5.7% of owner-occupied households and 16.7% of renter-occupied households throughout the County are overcrowded. Severe overcrowded is also an issue in the County, especially amongst renter households. Approximately 1.5% of owner households and 7.6% of renter households are severely overcrowded.

Figure E- 37 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- 24, below, shows that 2.7% of owner-occupied households and 8.7% of renter-occupied households in Culver City are overcrowded. Overcrowding is less common in Culver City than the County. Only 0.8% of owner households and 3.8% of renter households in Culver City are severely overcrowded.

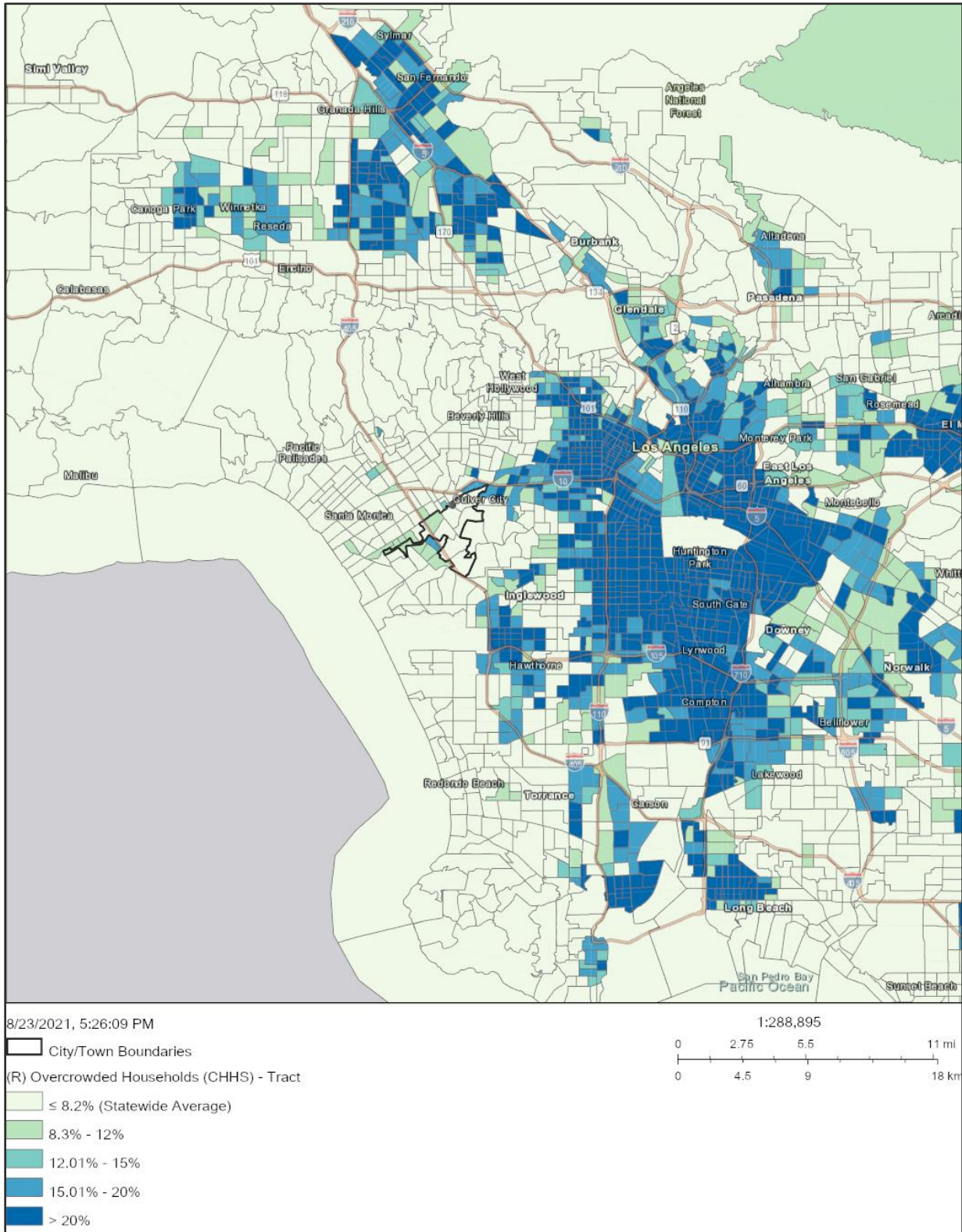
Figure E- 38 shows the concentration of overcrowded and severely overcrowded households in Culver City by census tract. Overcrowded households account for less than 8.2% (statewide average) of households in most tracts. Between 8.3 and 12% of households are overcrowded in two tracts in the western corner of the City. As discussed previously, these tracts also have a higher concentration of cost burdened renters, racial/ethnic minorities, and LMI households (see Figure E- 2, Figure E- 14, and Figure E- 36). One of the tracts with a higher concentration of overcrowded households is also a moderate resource area (see Figure E- 25). There are no tracts in Culver City with a concentration of severely overcrowded households exceeding 5%.

Table E- 24: Overcrowding by Tenure

	Overcrowded (>1 person per room)		Severely Overcrowded (>1.5 person per room)		Total Households
	Households	Percent	Households	Percent	
Culver City					
Owner-Occupied	240	2.7%	70	0.8%	8,840
Renter-Occupied	670	8.7%	295	3.8%	7,705
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

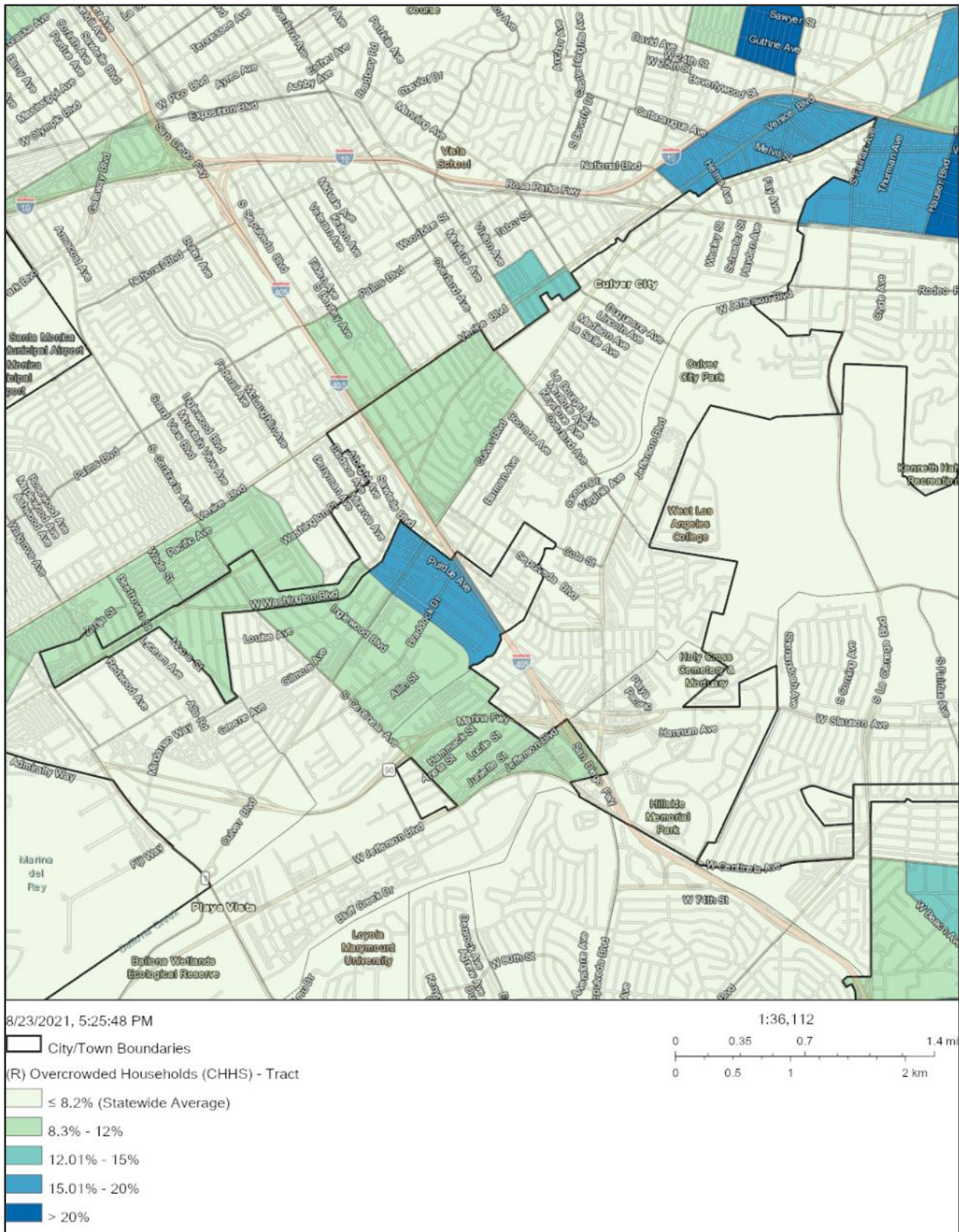
Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

Figure E- 37: Regional Concentration of Overcrowded Households



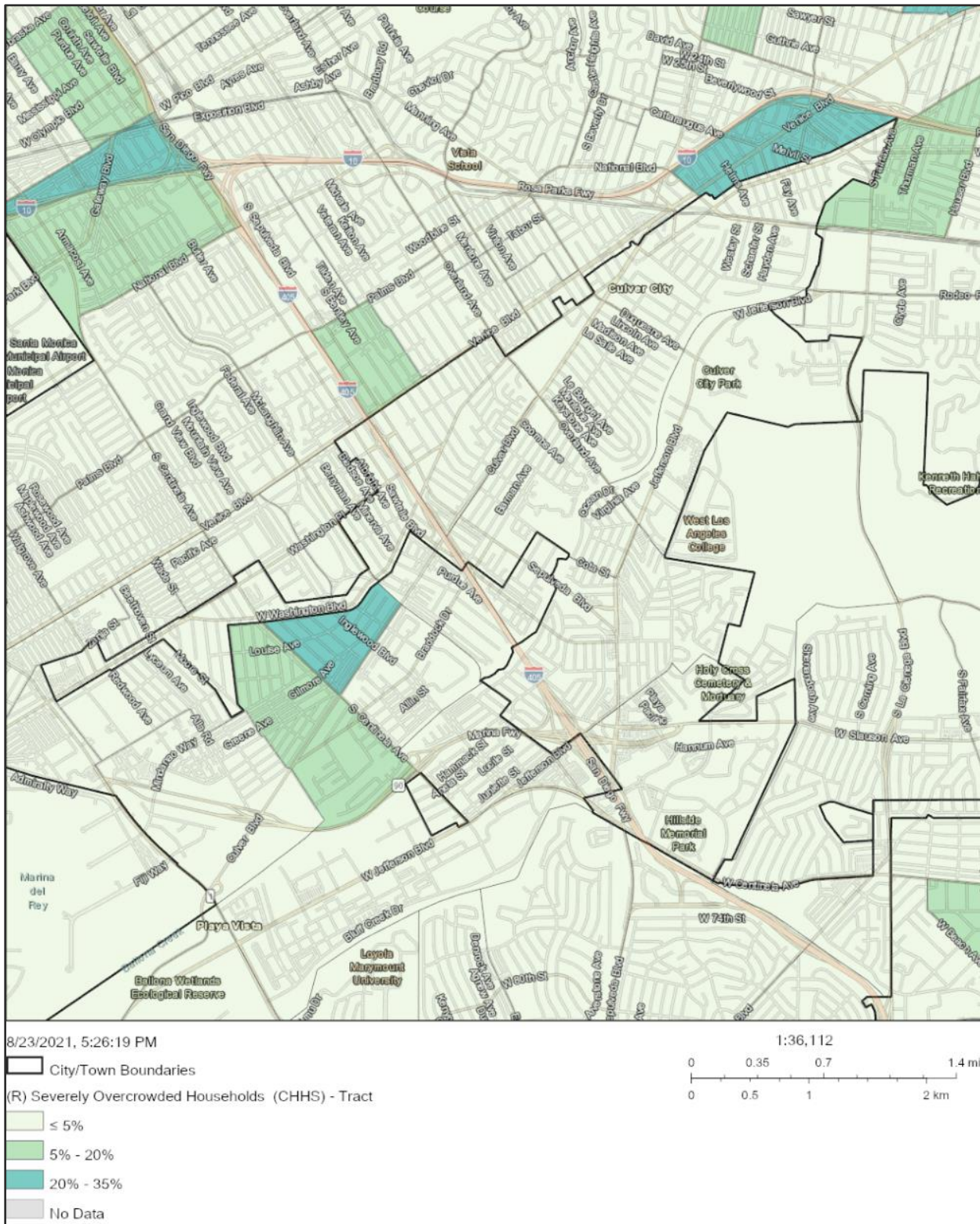
Source: HCD AFFH Data Viewer (2020 HUD CHAS data), 2021.

Figure E- 38: (A) Overcrowded Households by Census Tract



Source: HCD AFFH Data Viewer (2020 HUD CHAS data), 2021

Figure E- 33: (B) Severely Overcrowded Households by Census Tract



Source: HCD AFFH Data Viewer (2020 HUD CHAS data), 2021

Substandard Housing

Incomplete plumbing or kitchen facilities and housing stock age 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.

Regional Trend. Less than one percent of owner-occupied households and 2.8% of renter-occupied households in Los Angeles County lack complete plumbing or kitchen facilities (Table E- 25). Overall, only 1.7% 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% of the housing stock was built prior to 1990, including 60.5% built prior to 1970 (Table E- 26).

Local Trend. In Culver City, 0.7% of owner-occupied households and 4.4% percent of renter-occupied households lack complete plumbing or kitchen facilities, a larger proportion than the County. Overall, 2.4% of Culver City households lack complete facilities.

According to the 2015-2019 ACS, approximately 92.4% of the housing stock in Culver City was built prior to 1990 and may be susceptible to deterioration compared to 85.9% Countywide (Table E- 26). Tracts 7026, 7027, and 7028.02, located along the western city boundary, have the highest concentration of housing units built more than 50 years ago. Tracts 7028.01 and 7028.03, also located in the western corner of the city, have the highest concentration of new housing units built in 1990 or later. The median year built for housing units by tract is show in Figure E- 39.

Table E- 25: Incomplete Plumbing or Kitchen Facilities

	Lacking Complete Kitchen or Plumbing Facilities		Total Households
	Households	Percent	
Culver City			
Owner-Occupied	60	0.7%	8,840
Renter-Occupied	339	4.4%	7,705
Los Angeles County			
Owner-Occupied	6,850	0.5%	1,512,365
Renter-Occupied	50,030	2.8%	1,782,835

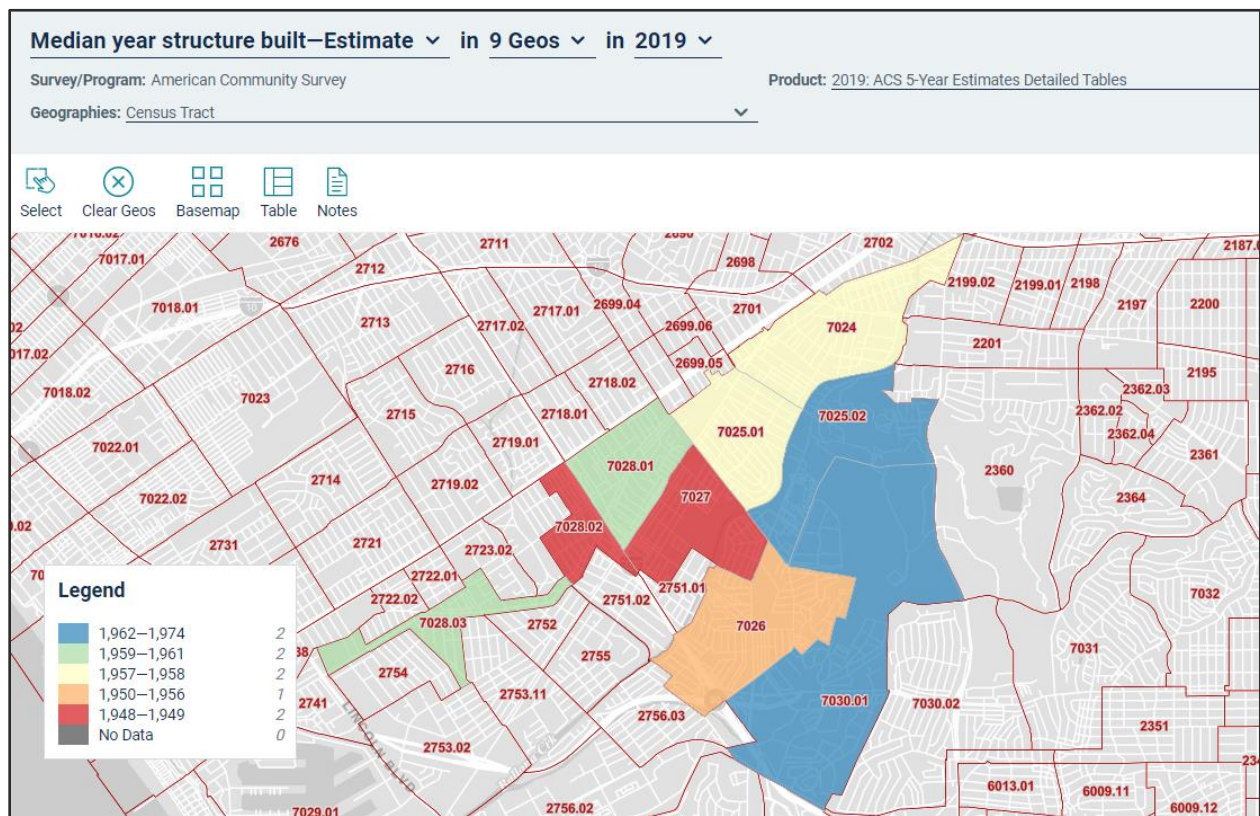
Source: HUD CHAS Data (based on 2013-2017 ACS), 2020.

Table E- 26: Housing Stock Age

Tract/Jurisdiction	1969 or Earlier (50+ Years)	1970-1989 (30-50 Years)	1990 or Later (<30 Years)	Total Units
7024	68.3%	22.0%	9.7%	2,056
7025.01	63.7%	31.7%	4.7%	2,214
7025.02	18.3%	77.8%	3.9%	2,170
7026	86.4%	9.5%	4.1%	2,369
7027	86.2%	6.1%	7.8%	1,322
7028.01	65.0%	21.0%	13.9%	2,259
7028.02	94.1%	3.6%	2.3%	912
7028.03	64.1%	23.4%	12.4%	1,229
7030.01	47.8%	44.0%	8.2%	3,307
Culver City	62.6%	29.8%	7.6%	17,703
Los Angeles County	60.5%	25.4%	14.1%	3,542,800

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

Figure E- 39: Median Year Structure Built by Census Tract



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

Displacement Risk

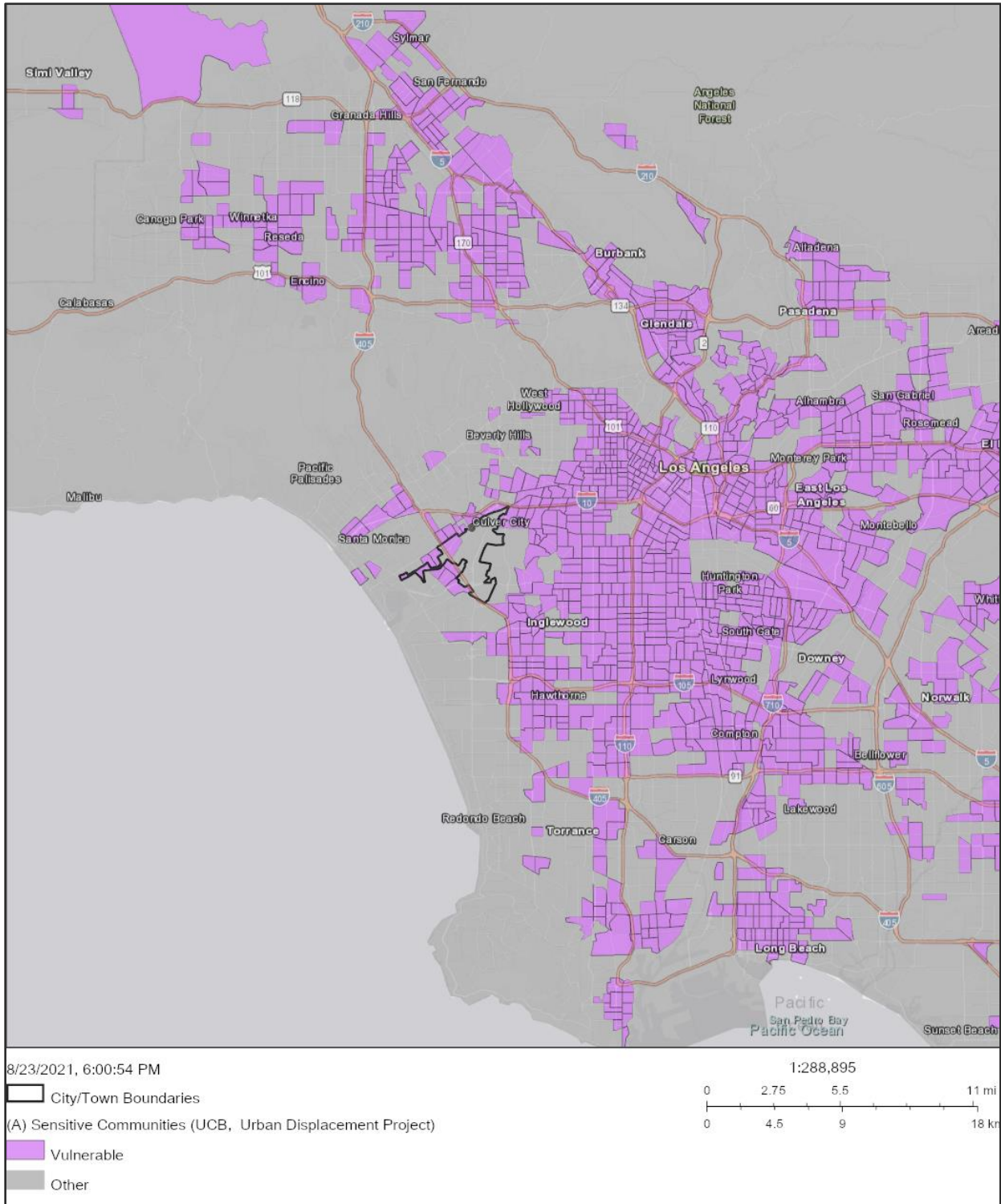
HCD defines sensitive communities as “communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost.” The following characteristics define a vulnerable community:

- The share of very low income residents is above 20%; and
- The tract meets two of the following criteria:
 - Share of renters is above 40%,
 - Share of people of color is above 50%,
 - Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median,
 - They or areas in close proximity have been experiencing 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.

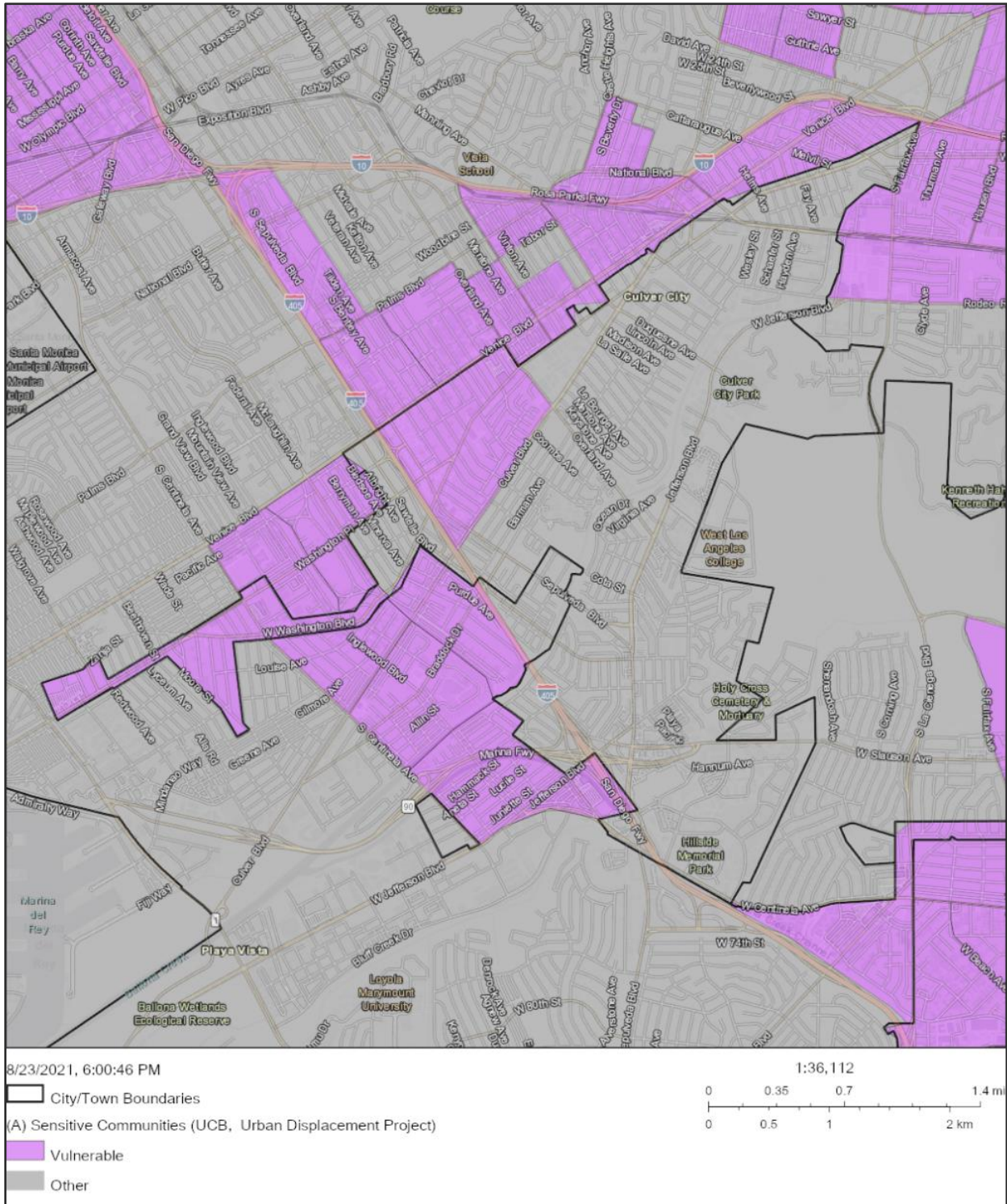
Local Trend. HCD has identified two vulnerable communities with populations that may be vulnerable to displacement in the event of increased redevelopment or drastic shifts in housing cost in Culver City. These vulnerable communities are located on the western side of the City (Figure E- 41). These tracts also have higher concentrations of racial/ethnic minorities, LMI households, and cost burdened renters (see Figure E- 2, Figure E- 13, and Figure E- 36). These tracts also received lower jobs proximity index scores than the rest of the City (see Figure E- 34). The tract in the far western corner is considered a moderate resource area (see Figure E- 25).

Figure E- 40: Regional Communities at Risk of Displacement



Source: HCD AFFH Data Viewer (2020 Urban Displacement Project), 2021.

Figure E- 41: Sensitive Communities at Risk of Displacement



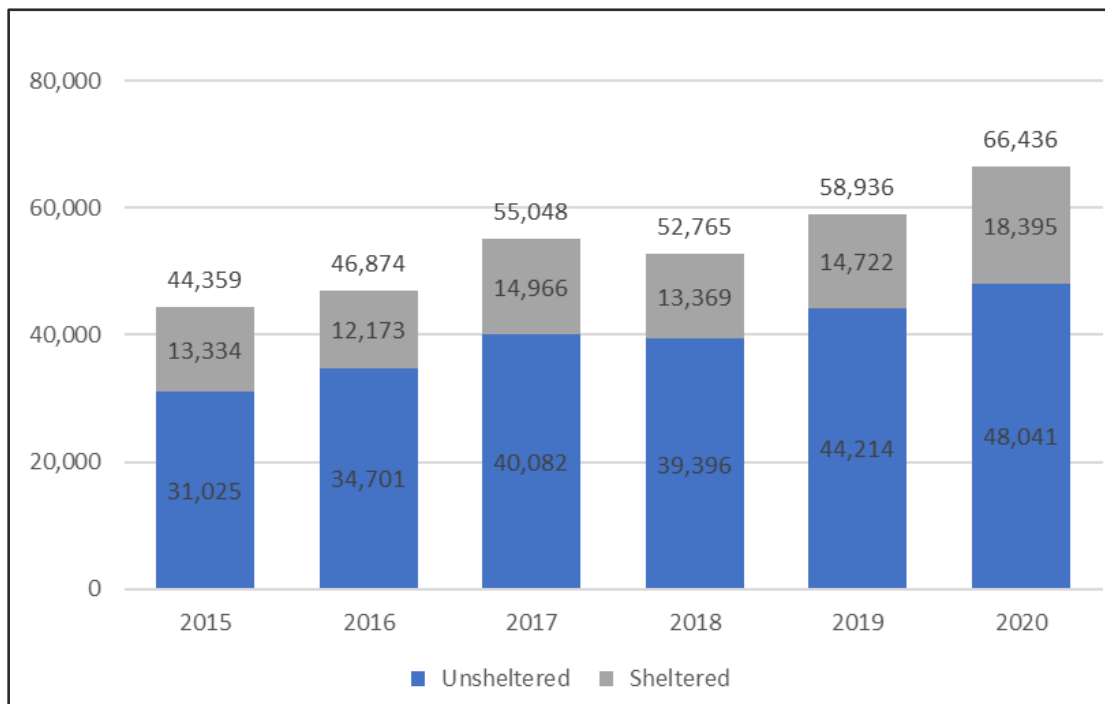
Source: HCD AFFH Data Viewer (2020 Urban Displacement Project), 2021.

Homelessness

Regional Trend. The Los Angeles Homeless Services Authority (LAHSA) estimates there were 66,436 persons experiencing homelessness in the Los Angeles County, according to 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% of the homeless population is unsheltered and 28% is sheltered. The homeless population has increased nearly 50% since 2015, and 12.7% since 2019. As of January 2020, the total Los Angeles County population has increased by only 0.5% since 2015 and decreased by 0.1% since 2019 according to Department of Finance (DOF) estimates.

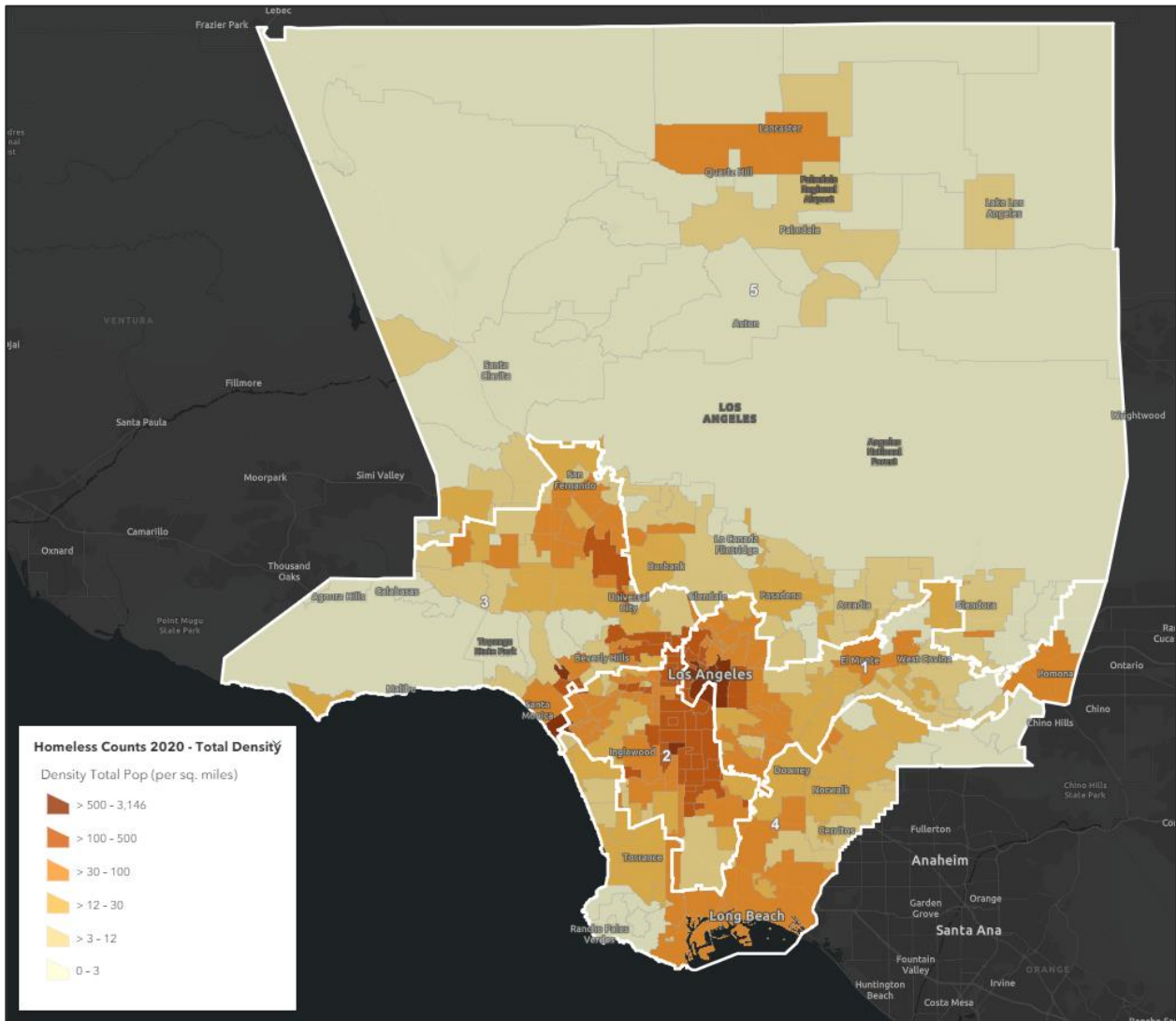
Figure E- 43 shows the density of homeless population density in persons per square mile by community. The central Los Angeles County jurisdictions have the highest density of persons experiencing homelessness. In general, the number of persons experiencing homelessness decreases towards the Los Angeles County boundaries. Jurisdictions with high concentrations of homelessness outside of the central County areas include Venice, unincorporated West Los Angeles, and North Hollywood.

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



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

Figure E- 43: Los Angeles County Homeless Count Density (2020)



Source: Los Angeles County Homelessness & Housing Map (based on 2020 LAHSA Homeless PIT Count), 2021.

Table E- 27 shows the homeless populations in 2019 and 2020 by population type, gender, and health/disability. Approximately 19.3% of the homeless population belongs to a family with one or more child, 38.4% are chronically homeless, and 22.3% have a serious mental illness. Since 2019, the population of homeless family members (+45.7%), persons experiencing chronic homelessness (+54.2%), persons fleeing domestic violence (+40%), non-binary/gender non-conforming persons (+325.5), and persons with a substance use disorder (+104%) have increased the most drastically. The population of transgender persons and persons with HIV/AIDS experiencing homelessness have decreased by 81.4% and 4.7%, respectively.

Table E- 27: 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.

Approximately 19.5% of the homeless population are members of families with one or more child under the age of 18, 9.9% are elderly persons aged 62 and older, 17% have a physical disability, and 8.3% have a developmental disability. Only 32% of homeless persons with a developmental disability, 17.3% with a physical disability, and 21.5% of homeless seniors are sheltered. Over 75% of family members are sheltered (Table E- 28).

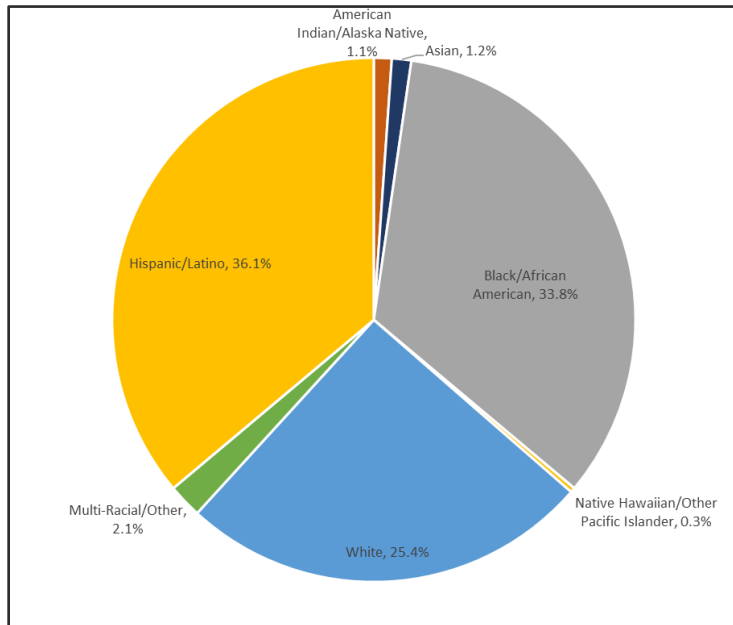
Table E- 28: Homeless Populations and Special Needs Groups

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- 44 shows the 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. Approximately 33.8% of homeless persons are Black or African American, compared to only 7.8% of the population countywide. The American Indian and Alaska Native population is also overrepresented, making up only 0.2% of the County population, but 1.1% of the homeless population.

Figure E- 44: Los Angeles CoC Homeless Population by Race/Ethnicity

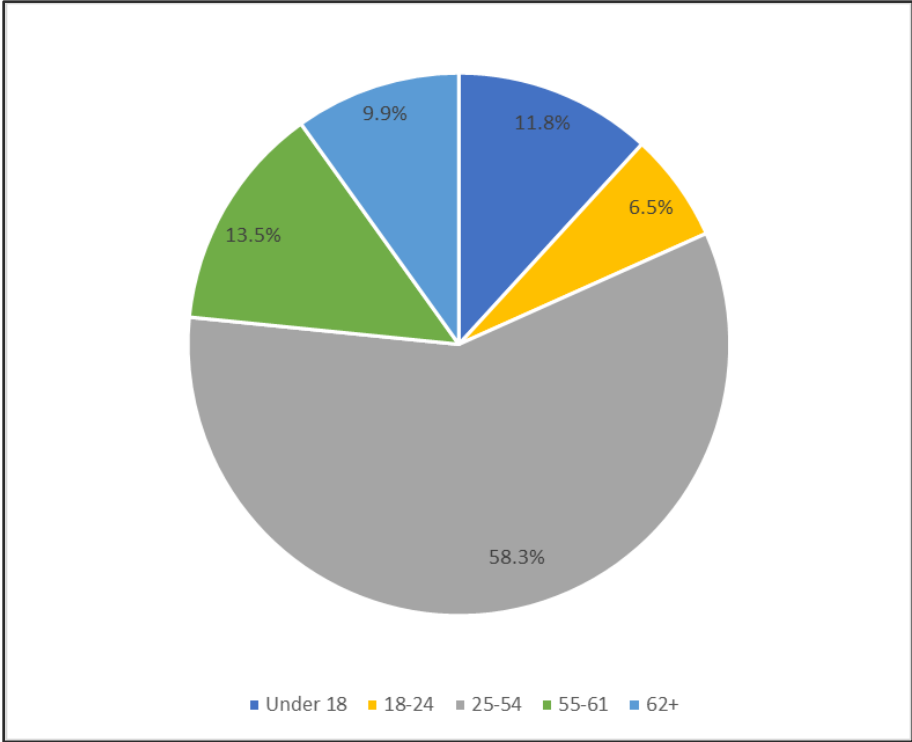


Race/Ethnicity	Homeless Population		Percent of Total Population
	Persons	Percent	
American Indian/ Alaska Native	686	1.1	0.2
Asian	774	1.2	14.4
Black/African American	21,509	33.8	7.8
Hispanic/Latino	23,005	36.1	48.5
Native Hawaiian/Other Pacific Islander	205	0.3	0.2
White	16,208	25.4	26.2
Multi-Racial/Other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

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

Figure E- 45 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% of the homeless population and seniors (age 62+) account for 9.9% of the population. Approximately 6.6% of the homeless population is transitional aged youths between the ages of 18 and 24.

Figure E- 45: Los Angeles CoC Homeless Population by Age

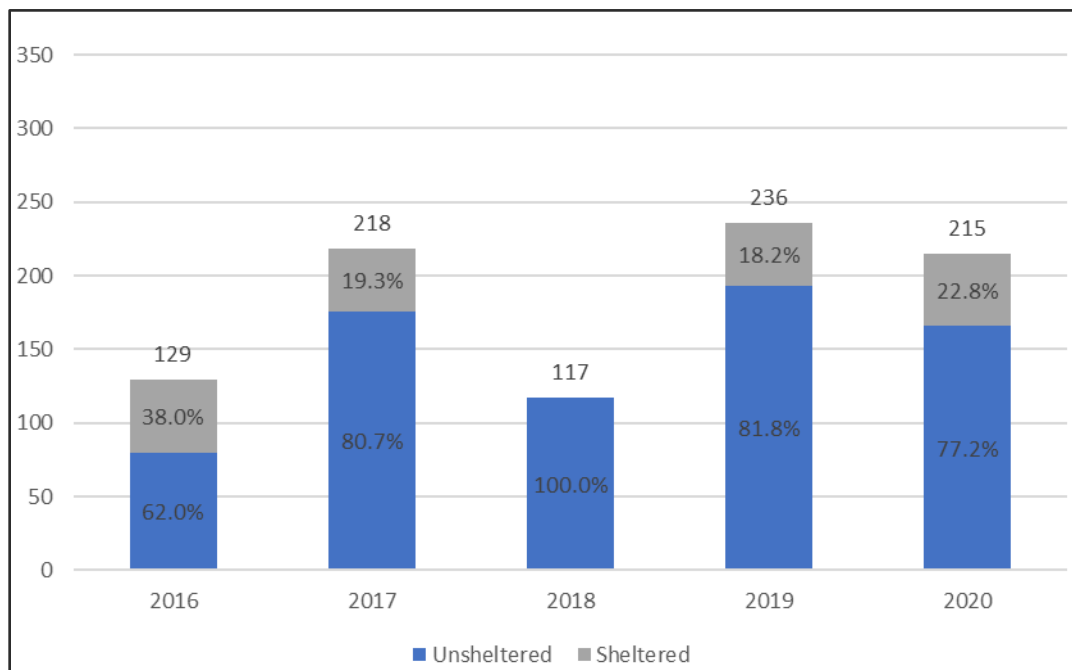


Age	Homeless Population		Percent of Total Population
	Persons	Percent	
Under 18	7,491	11.8	22.0
18-24	4,181	6.6	9.7
25-54	37,138	58.3	43.2
55-61	8,606	13.5	8.7
62+	6,290	9.9	16.4

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

Local Trend. Figure E- 46 shows the homeless population trend in Culver City from 2016 to 2020. As of 2020, there are 215 persons experiencing homelessness in Culver City. Of the 215 persons counted in Culver City during the 2020 Greater Los Angeles Homeless Count, 77% were unsheltered and 23% were sheltered. All sheltered persons in Culver City were in emergency shelters. Of the unsheltered population, 37.3% were on the street, 16.9% were in vans, 14.5% were in cars, 14.5% were in RVs/campers, 9% were in makeshift shelters, and 7.8% were in tents. The population of persons experiencing homelessness in Culver City has increased 66.7% since 2016 but decreased 8.9% since 2019.

Figure E- 46: Culver City Homeless Population PIT Count Trend (2016-2020)

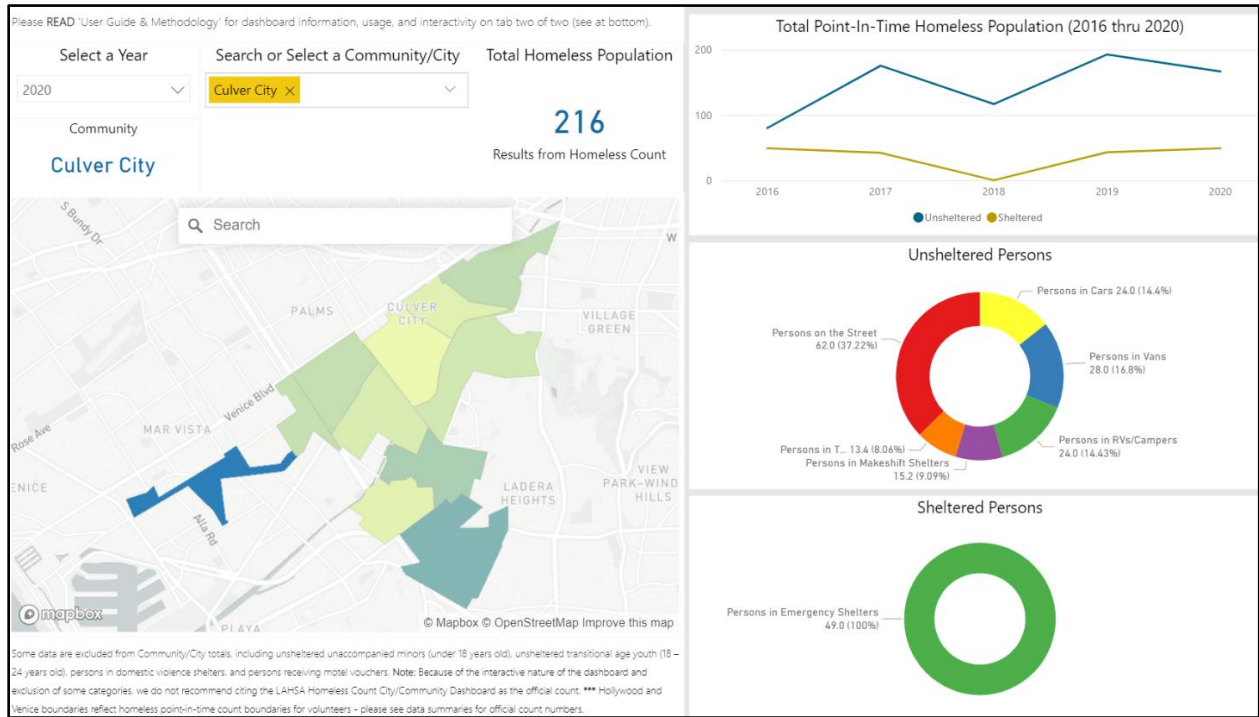


Source: LAHSA, 2020 Greater Los Angeles City/Community Homelessness Reports Service Planning Area 5.

A summary of the homeless population in Culver City, provided by LAHSA, is shown in Figure E- 47. As discussed previously, unsheltered persons make up more than 75% of the Culver City homeless population. The tract in the western and southern corners of the City had the largest homeless populations based on the 2020 PIT Count. Homeless counts by tract are shown in Table E- 29. Tract 7028.03, the western corner of the city, has the largest homeless population. This tract contains all the sheltered persons

counted in Culver City as well as the Upward Bound House emergency shelter. According to the 2021 LAHSA Housing Inventory Count, Upward Bound House has a total of 50 beds, 44 of which were occupied in January 2021. Approximately 17.8% of the 2020 homeless population was counted in tract 7030.01 and 13.9% was counted in tract 7026, both located in southern Culver City.

Figure E- 47: Culver City 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- 29: Homeless Count Data by Census Tract

Census Tract	Community Name	Unsheltered	Sheltered	Total	Percent of Total
702400	Culver City	24	0	24	10.9
702501	Culver City	2	0	2	0.9
702502	Culver City/Baldwin Hills/Crenshaw	13	0	13	5.9
702600	Culver City	30	0	30	13.9
702700	Culver City	9	0	9	4.1
702801	Culver City	16	0	16	7.3
702802	Culver City	16	0	16	7.2
702803	Culver City	20	49	69	32.0
703001	Culver City/ Ladera Heights	39	0	39	17.8
Total		168	49	217	100.0

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- 30.

Table E- 30: CES Assessments by Type and Services

	Culver City	SPA 5	City Percent of SPA 5
CES Assessments			
Total Persons	341	2,791	12.2
Individuals	275	2,267	12.1
Youth	14	173	8.1
Families	55	370	14.9
Veterans	39	531	7.3
Persons Aged 62+	49	461	10.6
Types of Services Provided to Those Assessed			
Interim Housing	124	993	12.5
Rapid Re-Housing	76	699	10.9
Street Outreach (Contacts)	184	1,232	14.9
Street Outreach (Engagements)	109	431	25.3
Other (Non-Permanent)	74	807	9.2
Placed into Permanent Housing*	54	458	11.8

*Includes persons that have moved into permanent housing during the report 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.

Historical Trends and Other Relevant Factors

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, by adopting policies forbidding them from residing or even being within town borders after dark, known as ‘sundown towns.’ Contrary to the widespread misconception that these existed only in the deep south, sundown towns were prominent throughout the Country. More than 100 towns in California, several of which were in Los Angeles County, were considered to be ‘sundown towns.’ Housing practices continued to promote segregation, including the Wilson Administration’s 1917 “Own-Your-Own-Home” campaign which promoted single-family ownership exclusively for White residents.⁶

Culver City was incorporated in 1917 by Harry Culver, who would eventually become the president of the Los Angeles Realty Board. Before Culver City’s annexation, racially restricted development was established, specifically by the Guy M. Rush Company in Culver City’s Brooklyn West tract where advertisement tactics were “restricted to Caucasian race.”⁷

The Advisory Committee on Zoning was formed in 1921 under Herbert Hoover, Secretary of State under President Warren G. Harding’s. Under this committee, the first model zoning ordinance was created, encouraging exclusionary zoning.⁶

The Home Owners’ Loan Corporation (HOLC), formed in 1933 under the New Deal Program, established the County’s first red-lining maps. Redlining maps established under the National Housing Act of 1934 ranked neighborhoods from A-rated (green), indicating the community “represented the best investment for homeowners” to D-rated (red), indicating the least desirable neighborhoods, where minority communities typically lived.⁸ As shown in Figure E- 48 and Figure E- 49, a majority of Culver City neighborhoods were D-rated, or “declining.” Two neighborhoods in the center of the city were B-rated and considered “still desirable” and two neighborhoods were D-rated and considered “hazardous.”

Historical redlining practices shape segregation patterns in Culver City today. As presented above in Figure E- 4, a majority of the block groups in Culver City have racial/ethnic minority populations between 41 and 60%. Multiple block groups in Culver City have racial/ethnic minority populations exceeding 60%, including the two historically redlined neighborhoods along the central northern boundary and northeastern corner of the city. These redlined neighborhoods also currently have median incomes below the Statewide average (Figure E- 20). The redlined neighborhood along the central northern city boundary is also considered an LMI area where more than 50% of households are low or moderate income (Figure E- 14). Overall, Culver City was generally categorized as a middle class neighborhood by redlining maps, reflecting the composition of racial/ethnic minority populations and household income in modern day Culver City.

Segregation achieved through redlining was further exacerbated when the Federal Housing Administration (FHA) was established 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

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

⁷ Redford, Laura. (2014). *The Promise and Principles of Real Estate Development in an American Metropolis: Los Angeles 1903-1923*. University of California, Los Angeles.

⁸ KCET. (2017). *Segregation in the City of Angels: A 1939 Map of Housing Inequality in L.A.* <https://www.kcet.org/shows/lost-la/segregation-in-the-city-of-angels-a-1939-map-of-housing-inequality-in-la>; Los Angeles Public Library (LAPL). (2020). *Los Angeles Land Covenants, Redlining; Creation and Effects*. <https://lapl.org/collections-resources/blogs/lapl/los-angeles-land-covenants-redlining-creation-and-effects>

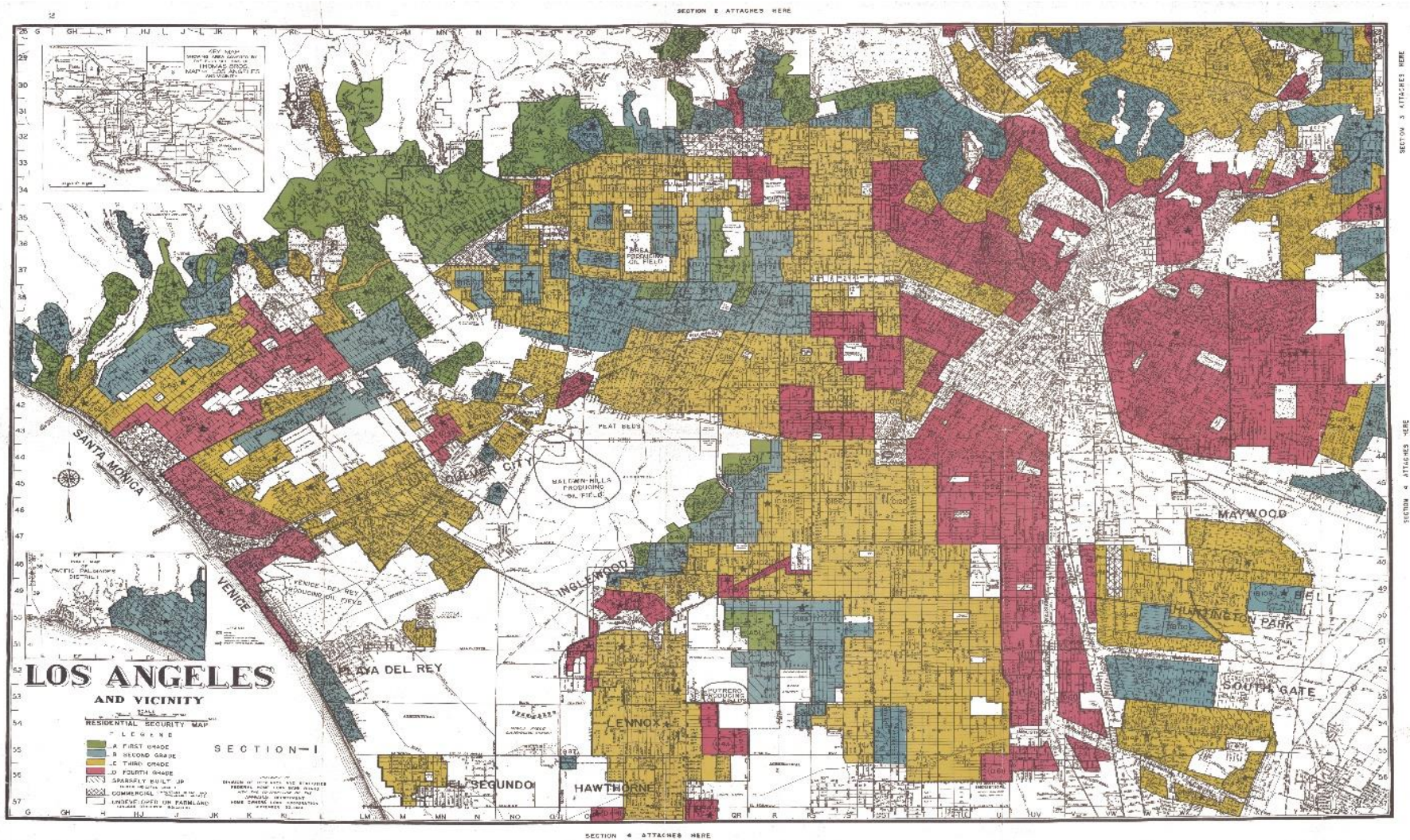
granted only to Whites and mixed-race neighborhoods or White neighborhoods in the vicinity of Black neighborhoods were deemed “too risky.”⁶

Following World War II, the FHA funded subdivisions exclusive to White residents, specifically withdrawing funding and approval for neighborhoods located adjacent to African American neighborhoods. About 6 million housing units were constructed in California between 1945 and 1973, 3.5 million of which were single-family homes.⁹

Federal rulings, including *Shelley v. Kraemer* (1948) and *Barrows v. Jackson* (1953) aimed to prohibit restrictive covenants and restrict lawsuits against property owners who sold to minorities. However, this did not prevent property owners from practicing housing discrimination throughout the 1960s. By the time the Civil Rights Act was signed in 1968, suburbs of nearly all American cities, including Los Angeles, were predominantly White due to the post-World War II housing boom.⁹

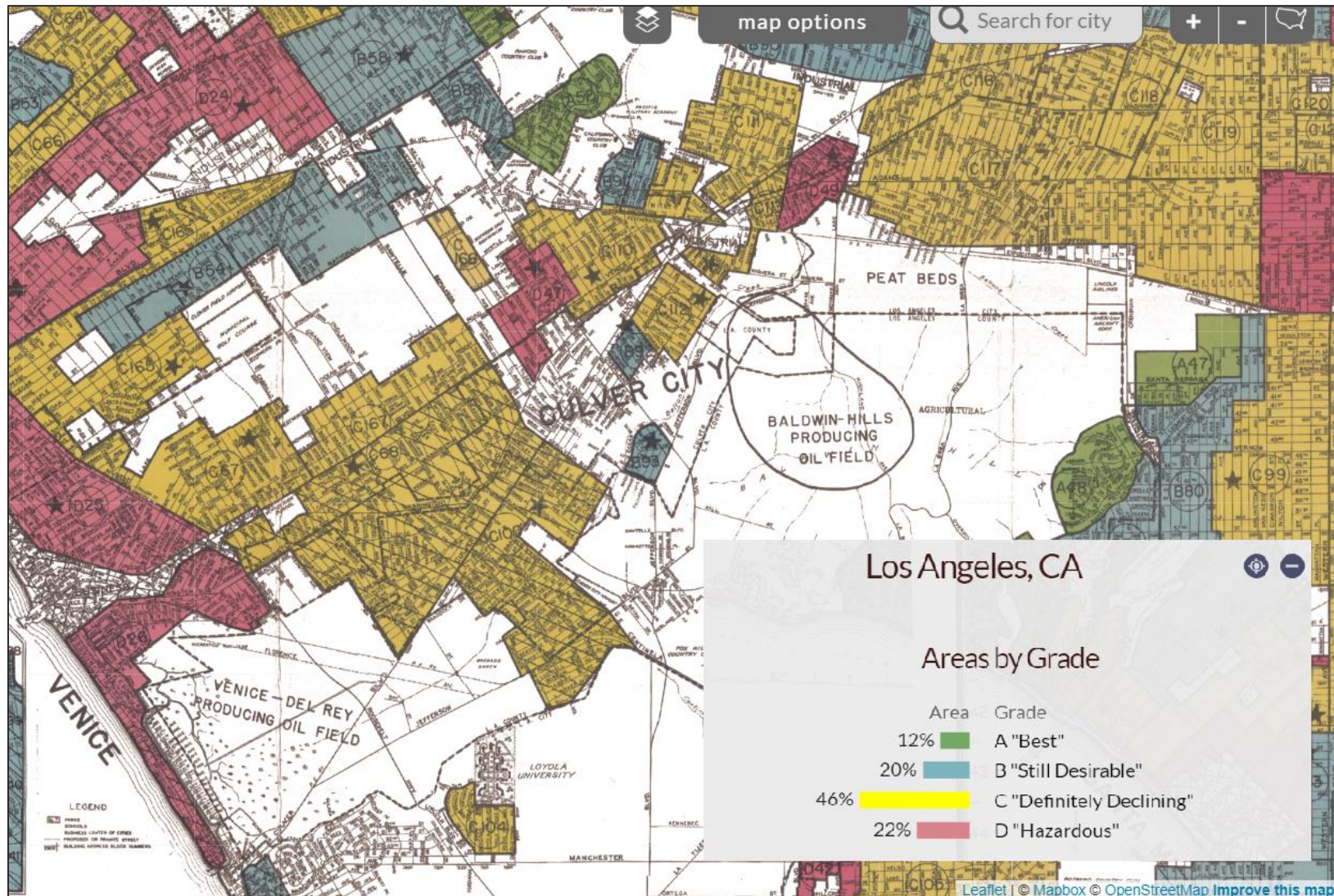
⁹ *Tract Housing in California, 1945-1973. (2011). Caltrans.*

Figure E- 48: Regional Redlining Map – Los Angeles County and Vicinity (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 November 15, 2021, <https://dsl.richmond.edu/panorama/redlining/>.

Figure E- 49: Redlining Map – Culver City and Vicinity (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 November 15, 2021, <https://dsl.richmond.edu/panorama/redlining/>.

Summary of Fair Housing Issues

Table E- 31, below, shows a summary of the issues identified in this Assessment of Fair Housing. Fair housing issues are most concentrated in tracts on the western side of the City along the northwestern border, where there are higher concentrations of racial/ethnic minorities, LMI households, and cost burdened renters. These areas are also considered vulnerable communities at risk of displacement, and one of these tracts is categorized as a moderate resource area.

Table E- 31: Summary of Fair Housing Issues

Fair Housing Issue	Summary
<i>Enforcement and Outreach</i>	
Fair Housing Records	<ul style="list-style-type: none"> • HRC provides fair housing services, including outreach and education, to the Los Angeles Urban County including Culver City; however, no specific service records on Culver City are available. • During the 2019-2020 FY, HRC received 356 fair housing inquiries opened 83 housing discrimination cases; most of the discrimination cases were related to physical and mental disabilities. • Between January 2013 and March 2021, HUD received 26 FHEO inquiries from Culver City residents. • Less than 5% of renters in three Culver City tracts receive HCVs.
<i>Integration and Segregation</i>	
Race/Ethnicity	<ul style="list-style-type: none"> • Based on HUD's dissimilarity index, non-White and White communities in the Urban County are highly segregated. • 54% of Culver City residents belong to a racial/ethnic minority group, compared to 74% in the County. • The racial/ethnic minority population has grown since 2010 in most Culver City block groups. • A larger proportion of lower income RHNA units are in block groups with higher concentrations of racial/ethnic minorities compared to moderate and above moderate income units.
Disability	<ul style="list-style-type: none"> • 9.3% of Culver City residents experience a disability compared to 9.9% in the County. • A slightly larger share of lower income RHNA units are in tracts with larger populations of disabled persons compared to moderate and above moderate income units.
Familial Status	<ul style="list-style-type: none"> • 26.6% of Culver City households have one or more child; 4.9% are single-parent households and 3.4% are single-parent female-headed households. • More than 20% of children live in female-headed households in only two tracts in the City. • A larger proportion of lower income units are in tracts where over 80% of children are in married couple households and

Fair Housing Issue	Summary
	fewer than 20% of children are in female-headed households, compared to moderate and above moderate income units.
Income	<ul style="list-style-type: none"> • 32.4% of Culver City households earn less than 80% of the County AMI, compared to 51.6% countywide. • The western side of the City has higher concentrations of LMI households making up 50-75% of the population. • More lower income RHNA units are located in block groups where 50-75% of the population is LMI compared to moderate and above moderate income units.
<i>Racially or Ethnically Concentrated Areas of Poverty</i>	
Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)	<ul style="list-style-type: none"> • There are no R/ECAPs in Culver City; there are also no tracts categorized as areas of high segregation and poverty by the Fair Housing Task Force.
Racially/Ethnically Concentrated Areas of Affluence (RCAAs)	<ul style="list-style-type: none"> • Most Culver City tracts are predominantly White, but none have racial/ethnic minority populations below 20%. • Several block groups in the central and eastern sections of the City have median incomes exceeding \$125,000. • Two RCAAs have been identified in the City; a majority of households in these tracts are owner-occupied and most units are single-family homes.
<i>Access to Opportunities</i>	
	<ul style="list-style-type: none"> • Urban County residents are less likely to be exposed to poverty and have better access to higher quality schools than residents countywide; environmental health is better in the Urban County for White, Black, and Native American residents, but worse for Hispanic and Asian residents. • Most tracts in Culver City are considered high and highest resource areas; the tract on the western end of the City is categorized as moderate resource. • A majority of lower income RHNA units are in high resource areas, while a majority of moderate and above moderate income units are in highest resource areas.
Economic	<ul style="list-style-type: none"> • All of the tracts in the City scored in the highest quartile of economic scores.
Education	<ul style="list-style-type: none"> • Tracts on the eastern side of the City received higher education scores than the tract on the western side. • The tract with the lowest education score is considered a moderate resource area.
Environmental	<ul style="list-style-type: none"> • Tracts along the western, southern, and eastern City boundaries received environmental scores in the lowest quartile. • Tracts in the northern/central areas of the City received environmental scores between 0.25 and 0.50; all tracts in Culver City received lower environmental scores below 0.50.
Transportation	<ul style="list-style-type: none"> • Culver City received an All Transit Performance score of 8.8, higher than most surrounding jurisdictions and the County. • The eastern, southern, and central sections of the City have the highest jobs proximity indices between 80 and 100; the

Fair Housing Issue	Summary
	<p>block groups on the western side of the City received slightly lower jobs proximity indices between 60 and 80.</p> <ul style="list-style-type: none"> Nearly all of Culver City is considered an HQT.A.
<i>Disproportionate Housing Needs</i>	
	<ul style="list-style-type: none"> 35.6% of owner households and 49.1% of renter households in Culver City have one or more housing problem Hispanic renter-occupied households and Black owner-occupied households have the most housing problems in the City.
Cost Burden	<ul style="list-style-type: none"> Black owner households and Hispanic renter households have the highest rate of cost burden in the City. The proportion of cost burdened owners has decreased in most tracts since the 2010-2014 ACS. The proportion of cost burdened renters has fluctuated throughout the City since the 2010-2014 ACS; two tracts on the western side of the City saw an increase in cost burdened renters from 40-60% to 60-80%.
Overcrowding	<ul style="list-style-type: none"> 2.7% of owner households and 8.7% of renter households are overcrowded in Culver City. The concentration of overcrowded households exceeds the Statewide average in two tracts on the western side of the City.
Substandard Housing Conditions	<ul style="list-style-type: none"> Less than 1% of owner households and 4.4% of renter households lack complete plumbing or kitchen facilities in the City. Culver City has an aging housing stock, where 92.4% of housing was built prior to 1990 compared to only 85.9% countywide. Tracts along the western City boundary have the largest proportion of housing units built in 1969 or earlier.
Displacement	<ul style="list-style-type: none"> Two tracts on the western side of the City are considered vulnerable communities at risk of displacement.

Identification and Prioritization of Contributing Factors

The following are contributing factors that affect fair housing choice in Culver City, listed in order of priority.

Lack of Housing Opportunities in High Resource Areas and Housing Mobility

Overpaying renters are most concentrated in two tracts in the western areas of Culver City. Fewer than 5% of renters in these all Culver City tracts receive HCVs despite the concentration of overpaying renters. The City lacks outreach and education methods to disseminate information about HCVs, including encouraging property owners to accept HCVs throughout the City, specifically in higher resource areas. RCAA tracts identified in

the City also contain high concentrations of owner-occupied households and single-family homes that may not be affordable to lower or moderate income households.

Contributing Factors – High Priority

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
 - Insufficient outreach and education efforts related to fair housing, being only a participant to the County's program
- Lack of resources for fair housing agencies and organizations
- Concentration of overpaying renters
- Limited housing choices for lower and moderate income households
- Limited affordable housing opportunities in Higher Resource areas

Displacement Risk of Low Income Residents Due to Economic Pressures

Tracts on the western side of the City are considered vulnerable communities at risk of displacement. This area also has higher concentrations of LMI households and cost burdened renters and is a lower opportunity area. Between 60% and 80% of renter households in this section of the City overpay for housing.

Contributing Factors – High Priority

- Displacement of residents due to economic pressures
- Land use and zoning laws
- Location and type of affordable housing
- Unaffordable rents
- Concentration of poverty in some tracts
- Availability of affordable housing

Substandard housing Conditions

Approximately 0.7% of owner households and 4.4% of renter households in Culver City lack complete kitchen or plumbing facilities. Approximately 62.6% of the City's housing stock was built prior to 1970 (50+ years old), and over 90% was built prior to 1990 (30+ years old). Tracts along the western City boundary have the highest concentration of housing units aged 50 or older. This area of the City also serves larger populations of cost burdened households and LMI households.

Contributing Factors – Medium Priority

- Age of housing stock

- Cost of repairs or rehabilitation
- Lack of public investments in specific neighborhoods, including services or amenities