City of Bellflower

2020 Analysis of Impediments to Fair Housing Choice

June 8, 2020
A. INTRODUCTION

1. Format of the AI Report

The U.S. Department of Housing and Urban Development (HUD) has not issued regulations defining the scope of analysis and the format to be used by grantees when they prepare their Analysis of Impediments to Fair Housing Choice (AI). In 1996, HUD published a Fair Housing Planning Guide which includes a “Suggested AI Format.” Because this Guide is the only official guidance provided by HUD to grantees on how to prepare and organize an AI, Bellflower’s AI conforms to the format suggested by HUD.

Section I Introduction: The Introduction presents the AI report format; Bellflower’s regional setting, purpose of the report, fair housing definition and lead agency and funding.

Section II Fair Housing Action Plan: Section II describes the conclusions and recommendations resulting from the AI analysis. It identifies impediments to fair housing choice and the actions which will be taken to remove or ameliorate impediments during the FY 2020-2021 to FY 2014-2025 time period. Actions to affirmatively further fair housing also are described in the Fair Housing Action Plan.

Section III Fair Housing Legal Status: This Section discusses fair housing complaints and compliance reviews and other information pertaining to Bellflower’s fair housing legal status.

Section IV: City Background Data: HUD advises grantees to include in the AI “jurisdictional background data” on demographics, income, employment, housing and other relevant data. This information is presented in Section IV.

Section V Fair Housing Protected Groups: This Section includes detailed demographic data on the fair housing protected groups – race/color; sex; national origin; familial status; religion; and handicap/disability.

Section VI Private Sector Impediments Analysis: Section VI presents an analysis of practices prohibited by the Federal Fair Housing Act (FHA) and the State’s Fair Employment and Housing Act (FEHA) and identifies those that pose impediments to fair housing choice. Impediments such as housing discrimination and discriminatory lending practices are described in Section VI.

Section VII Public Sector Impediments Analysis: This Section presents information on the planning and zoning policies, practices and regulations that impact fair housing.

Section VIII Private/Public Sector Impediments Analysis: Section VIII describes potential and actual impediments that overlap the private and public sectors such as the location of affordable multifamily rental housing and gentrification.

2. Bellflower’s Regional Setting

Bellflower is a city located in Southeast Los Angeles County, an area located between South Central Los Angeles and East Los Angeles also known as the "Gateway Cities" of Los Angeles. It is a member of the Gateway Cities Council of Governments, an organization that includes 27 cities, the Los Angeles County Supervisorial Districts 1, 2 and 4 and the Port of Long Beach.
The City was founded in 1906 and became incorporated on September 3, 1957. As of the 2010 census, the City had a total population of 76,616, up from 72,878 at the 2000 census. Bellflower is bordered by Downey on the north and northwest, Norwalk and Cerritos on the east, Lakewood on the south, Long Beach on the southwest, and Paramount on the west.

3. Purpose of the Report

The City of Bellflower annually receives funds from the Federal Community Development Block Grant (CDBG) program and HOME Investments Partnerships Program (HOME). An Affirmatively Furthering Fair Housing (AFFH) certification is required of cities and counties that receive funds from these programs. The AFFH certification states that the grantee receiving HUD funds:

...will affirmatively further fair housing ... by conducting an analysis to identify impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of any impediments identified through the analysis, and maintaining records reflecting the analysis and actions in this regard.

HUD interprets the broad objectives of the requirement to affirmatively further fair housing choice to mean that recipients must:

- Analyze and eliminate housing discrimination in the jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability, and national origin;
- Promote housing that is structurally accessible to, and usable by, persons with disabilities; and
- Foster compliance with the nondiscrimination provisions of the Federal Fair Housing Act.

Source: U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, Memorandum on Compliance-Based Evaluations of a Recipient’s Certifications that it has Affirmatively Furthered Fair Housing, March 5, 2013, page 4

Therefore, the fundamental purpose of the AI is to maintain the City of Bellflower’s compliance with the AFFH certification. In so doing, the City will promote fair housing and remove or mitigate the public and private sector impediments that have been identified through the analysis.

The time period of the AI is from FY 2020-2021 through FY 2024-2025. The AI time period aligns with Bellflower's five-year Consolidated Plan.

4. Defining Fair Housing Choice

HUD defines fair housing as:

...a condition in which individuals of similar income levels in the same housing market have a like range of choices available to them regardless of race, color, national origin, religion, sex, handicap, or familial status.
HUD draws an important distinction between household income, affordability and fair housing. Economic factors that impact housing choice are not fair housing issues per se. Only when the relationship between household incomes combined with other factors - such as household type or race and ethnicity - create misconceptions and biases do they become a fair housing issue.

Tenant/landlord disputes are also not typically fair housing issues, generally resulting from inadequate understanding by the parties on their rights and responsibilities. Such disputes only become fair housing issues when they are based on factors protected by fair housing laws and result in differential treatment.

Impediments to fair housing choice, according to HUD, are --

Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices. (Intent)

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices because of race, color, religion, sex, disability, familial status, or national origin. (Effect)

5. Lead Agency and Funding for the AI

The lead agency for preparation of the AI and Fair Housing Action Plan is the City of Bellflower Economic Development Department.

Valuable input to the AI was provided by the following:

- Residents who responded to the Analysis of Impediments to Fair Housing Choice Survey
- Planning Department
- Fair Housing Foundation (FHF)
- Los Angeles County Development Authority (LACDA)
- California Tax Credit Allocation Committee (CTCAC)
- California Department of Housing and Community Development (HCD)
- U.S. Department of Housing and Urban Development – Fair Housing and Equal Opportunity (FHEO), San Francisco Regional Office

CDBG funds were expended to complete the AI. CDBG funds paid for consultant assistance on the AI’s preparation and for staff time expended on the project. In addition, the City uses CDBG funds to support the services of the Fair Housing Foundation. The FHF compiled housing discrimination statistics for use in the AI and provides fair housing and tenant/landlord counseling services under contract to the City of Bellflower.
B. PROGRESS REPORT ON THE 2015-2019 AI FAIR HOUSING ACTION PLAN

The City adopted a *Fair Housing Action Plan* for the period from FY 2015-2016 to FY 2019-2020. The Plan included actions to be implemented by the City and Fair Housing Foundation. Table II-1 describes the progress made on implementing the recommended actions. Some actions were not implemented and are carried forward to the FY 2020-2021 to FY 2024-2025 period.
<table>
<thead>
<tr>
<th>Action</th>
<th>Implementation Progress</th>
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<tbody>
<tr>
<td><strong>Promote Greater Awareness of Tenant and Landlord Rights and Obligations: Action Program - Fair Housing Program</strong></td>
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<tr>
<td>The City will contract with the Fair Housing Foundation to provide residents with fair housing services which will include responding to housing discrimination complaints and counseling and mediation between tenants and landlords. The City will assist in program outreach through placement of fair housing program multilingual brochures at the public counter, City library, post office and other community locations.</td>
<td>Fair housing services have been provided to 593 persons which exceeds the 5-Year Strategic Plan objective of 300 persons.</td>
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<tr>
<td><strong>Provide Reasonable Accommodation for Persons with Disabilities: Action Program – Single Family Rehabilitation Program</strong></td>
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<td>The City's Housing Rehabilitation Programs will assist residents in need of reasonable accommodation by offering financial assistance to eligible residents to make ADA improvements. Loans and or grants to eligible households will be made available to complete home improvements that remove architectural barriers.</td>
<td>Improvements have been made to 20 homes which meets 56% of the 5-Year Strategic Plan objective (25 homes).</td>
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<tr>
<td><strong>Provide Home Ownership Opportunities for First Time Homebuyers: Action Program – First Time Homebuyer Program and Mortgage Credit and Mortgage Credit Certificate Program</strong></td>
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<td>The City will provide assistance to first time homebuyers through its First Time Homebuyer Program. The assistance will include down payment assistance loans including closing cost assistance; federal income tax credits, and below market rate loan programs. The City of Bellflower may participate in the federal Mortgage Credit Certificate (MCC) Program which is administered by the Los Angeles County Community Development Commission. The MCC program allows qualified first-time homebuyers to take an annual credit against their federal income taxes of up to 10 percent of the annual interest paid on the applicant's mortgage.</td>
<td>Eight households have been assisted by the First Time Homebuyer Program which exceeds the 5-Year Strategic Plan objective of four households.</td>
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<td>Action</td>
<td>Implementation Progress</td>
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<td>Maintenance and preservation of the existing housing stock in Bellflower is crucial to ensure quality neighborhoods. Code Enforcement is focused on the achievement of this goal through efforts to preserve substandard housing units by identifying substandard and deteriorating housing units and taking appropriate actions to ensure correction of deficiencies or removal and or replacement of those units which cannot be rehabilitated.</td>
<td>1,671 housing units have been inspected which exceed the 5-Year Strategic Plan objective of 350 housing units.</td>
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<td>Provide Housing Types to Accommodate Special Needs Groups: Action Program - CHDO Housing</td>
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<tr>
<td>There are a number of special housing needs, including victims of domestic violence, persons with substance abuse problems, seniors, large families, single parent families, and low-income households, among others. These groups may face greater difficulty in finding decent and affordable housing due to special circumstances primarily related to lack of income, family characteristics, disability, or health issues. Often times local nonprofit organizations that understand the plight of these individuals can best provide housing and supportive services to this segment of the population.</td>
<td>1 affordable housing project has been developed which meets the 5-year Strategic Plan objective.</td>
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<tr>
<td>Action</td>
<td>Implementation Progress</td>
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<td>-----------------------------------------------------------------------</td>
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<tr>
<td><strong>Provide Housing Assistance and Support to Very Low Income Residents: Action Program – Section 8 Housing and Public Housing</strong></td>
<td>The Los Angeles County Development Authority administers the Section 8 program which provides rent subsidies to very low income households who overpay for housing. Prospective renters secure housing from HUD-registered apartments that accept Section 8 certificates. HUD then pays the landlords the difference between what the tenant can afford (no more than 30 percent of their income) and the fair market rents. The City maintains an ongoing memorandum of understanding (MOU) with the Los Angeles County Housing Authority, which permits the Authority to provide rental assistance programs in the City of Bellflower.</td>
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<tr>
<td><strong>Provide Support and Assistance to the Homeless and Those At Risk of Becoming Homeless: Action Program – Homeless Assistance</strong></td>
<td>When funds are available, the City will use HOME and/or CDBG funds to support agencies that provide services to the homeless and persons at risk of becoming homeless and non-homeless person with special needs. The City will continue to support efforts by local non-profits to expand the transitional and temporary housing units with support services within the City.</td>
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</table>
### Table I-1 continued
#### City of Bellflower Progress Report
**FY 2015/2016 to FY 2019/2020 Fair Housing Action Plan**

<table>
<thead>
<tr>
<th>Action</th>
<th>Implementation Progress</th>
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<tbody>
<tr>
<td>Provide a Range of Housing Types to Achieve a Variety of Housing: Action Program – Overlay Zone/ Development Codes/Lot Consolidation</td>
<td>The City’s 2014-2021 Housing Element estimates that the BAMU Overlay Zone can accommodate 924 housing units. In October 2019, the City adopted the Downtown Bellflower Transit Oriented Development Specific Plan (TOD DP). The Specific Plan will be used in conjunction with the Bellflower General Plan to provide more detailed design and development criteria for individual project proposals and public improvements in the project area. The Specific Plan defines an updated land use plan, development standards, mobility plan, infrastructure improvements, design guidelines, and implementation programs for any proposed project in the Specific Plan area.</td>
</tr>
<tr>
<td>Minimize Governmental Constraints on Producing Affordable Housing: Action Program – Density Bonuses/Second Units/Flexible Development Standards</td>
<td>The Zoning Ordinance provides for incentives for the production of affordable housing. These incentives include density bonuses (Chapter 17.41); senior housing zone (Chapter 17.36); and accessory dwelling units (Chapter 17.16).</td>
</tr>
</tbody>
</table>
SECTION II
FAIR HOUSING ACTION PLAN
A. INTRODUCTION

HUD’s *Fair Housing Planning Guide* states:

Jurisdictions should summarize conclusions reached based on the AI, and describe in detail recommendations for resolution of the problems identified. This discussion is the link between the AI part of FHP [Fair Housing Planning] and the actions underway and proposed to promote fair housing choice.

Furthermore, the Affirmatively Furthering Fair Housing (AFFH) certification obligates the City to:

Take appropriate actions to overcome the effects of any impediments identified through the AI.

Therefore, the *Fair Housing Action Plan* (FHAP) describes the actions to overcome the impediments identified by the completion of the *Analysis of Impediments to Fair Housing Choice (AI)*.

B. FAIR HOUSING ACTION PLAN

Potential and actual impediments to fair housing choice are described in -

- Section VI – Private Sector Impediments Analysis
- Section VII – Public Sector Impediments Analysis
- Section VIII - Private/Public Sector Impediments Analysis

Based on HUD guidelines and a detailed analysis, each of the above sections presents conclusions regarding whether an impediment exists and, if so, recommends actions to remove or mitigate the identified impediments to fair housing choice. In some instances, even though an impediment was not found to exist, the City or Fair Housing Foundation will undertake actions to affirmatively further fair housing (AFFH). Actions to AFFH mean actions which contribute to eliminating housing discrimination and segregation; foster inclusive neighborhoods; provide housing for disabled persons, a protected class; and otherwise create positive impacts and change by promoting fair housing.

Table II-1 provides a brief summary of the conclusions reached and recommended actions regarding the following *private sector* impediments:

- Population Diversity
- Housing Discrimination
- Steering
- Property Management Practices

Table II-2 provides a brief summary of the conclusions reached and recommended actions regarding the following *public sector* impediments:

- Definition of Disability
- Transitional and Supportive Housing
- Reasonable Accommodation Procedure
Table II-3 provides a brief summary of the conclusions reached and recommended actions regarding the following private/public sector impediment:

- Location of Affordable Rental Housing Developments

Table II-4 provides a brief summary of the conclusions made and the actions that can be taken by the City or Fair Housing Foundation to affirmatively further fair housing in the following areas:

- Appraisal Practices
- Lending Patterns
- Homeowner’s and Renter’s Insurance

Table II-5 provides a brief summary of the conclusions made and the actions that can be taken by the City or Fair Housing Foundation to affirmatively further fair housing in the following area:

- Demographics of Publicly Supported Housing
<table>
<thead>
<tr>
<th>Population Diversity</th>
<th>Actions to Remove/Mitigate Impediments</th>
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<tbody>
<tr>
<td>Areas of minority population concentration and high poverty rates create an impediment to fair housing because the neighborhoods lack access to opportunity; for example, educational and employment opportunities.</td>
<td>Actions to ameliorate this impediment involve improvements to the neighborhood, creating incentives for market rate housing development, and enhancing the economic mobility of residents. In FY 2021-2022, the City will take following actions:</td>
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<td><strong>Action 1: Evaluate Place-Based Strategies</strong></td>
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<td>• Evaluate place-based strategies that could be effectively implemented in the neighborhoods with minority population concentrations, high poverty rates, and low resources.</td>
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<td><strong>Action 2: Develop Market Rate Housing</strong></td>
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<td>• Encourage the development of market rate housing in neighborhoods with minority population concentrations, high poverty rates, and low resources.</td>
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<tr>
<th>Housing Discrimination</th>
<th>Actions to Remove/Mitigate Impediments</th>
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<tr>
<td>Housing discrimination, particularly on the bases of disability, race, and familial status, is an impediment to fair housing choice. Based on past trends, it is estimated that 12 housing discrimination complaints may be filed by Bellflower residents with HUD during the five year period between FY 2020-2021 and FY 2024-2025. During the same period, it is estimated that 80 housing discrimination complaints may be filed with the FHF.</td>
<td>Housing discrimination is an impediment to fair housing choice. The City will take the following actions to remove or mitigate this impediment to fair housing choice:</td>
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<td><strong>Action 1: Continue to Provide Fair Housing Services</strong></td>
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<td>• During the five-year period from FY 2020-2021 through FY 2024-2025, the City will have the FHF provide fair housing services which will include the processing of housing discrimination complaints and landlord/tenant counseling services. Often a landlord/tenant issue has as its basis a housing discrimination concern.</td>
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### Table II-1

City of Bellflower

Fair Housing Action Plan: FY 2020-2021 to FY 2024-2025

Actions to Remove/Mitigate **Private Sector** Fair Housing Impediments

<table>
<thead>
<tr>
<th><strong>Private Sector</strong></th>
<th>Housing Discrimination</th>
<th>Actions to Remove/Mitigate Impediments</th>
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<td><strong>Action 2: Provide Targeted Fair Housing Education and Outreach</strong></td>
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<td>- The FHF will collaborate and coordinate with multiple agencies, including lenders, realtors, and cultural groups to provide increased efforts in educating residents.</td>
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<td>- The FHF should target this education and outreach to various special needs groups including, but not limited to: the disabled, the elderly, persons living with HIV/AIDS, low- and moderate-income large families, and minorities.</td>
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<td><strong>Action 3: Increase Fair Housing Services to Include Periodic Testing</strong></td>
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<td>- The City will collaborate with the Fair Housing Foundation to increase the Scope of Work to provide period testing throughout the City, particularly in the rental and lending markets.</td>
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<td><strong>Action 4: Increase Fair Housing Awareness and Education through the City’s website.</strong></td>
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<td>- The City, on its website, will increase efforts in educating residents on potential sources of discrimination and avenues to address fair housing on its website, by providing links to relevant information. Issues such as foreclosures, loan modifications, and short sales should be included, and the information should be provided in the English, Spanish and Asian languages.</td>
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## Table II-1
City of Bellflower
Fair Housing Action Plan: FY 2020-2021 to FY 2024-2025
Actions to Remove/Mitigate Private Sector Fair Housing Impediments

<table>
<thead>
<tr>
<th>Steering</th>
<th>Actions to Remove/Mitigate Impediments</th>
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<tr>
<td>Private Sector</td>
<td>The City will take the following actions to remove or mitigate this impediment to fair housing choice:</td>
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<tr>
<td>Although incidents of steering cannot be precisely quantified, there is evidence that it exists. Steering, therefore, creates an impediment to fair housing choice. Examples of steering are described on pages VI-9.</td>
<td><strong>Action 1: Provide Information on Steering at Consumer Fair Housing Workshops</strong></td>
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<td>▪ During the five-year period from FY 2020-2021 through FY 2024-2025, the FHF in their Consumer Fair Housing Workshops will provide 1) examples of how to detect “steering” when using the internet to conduct a home search process; 2) examples of how to detect loan steering; and 3) examples of steering that could be experienced by in-place tenants and apartment seekers.</td>
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<tr>
<th>Property Management Practices</th>
<th>Actions to Remove/Mitigate Impediments</th>
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<tbody>
<tr>
<td>The City will take the following action to remove or ameliorate this impediment to fair housing choice:</td>
<td><strong>Action 1: Provide Information on Prohibited Property Management Practices at Landlord Workshops</strong></td>
</tr>
<tr>
<td>Property management practices concerning service and companion animals, reasonable accommodations, and reasonable modifications impede fair housing choice.</td>
<td>▪ In the period from FY 2020/2021 to FY 2024/2025, the Fair Housing Foundation will continue to hold Landlord Workshops and include discussions on the prohibited discriminatory practices pertaining to service and companion animals, reasonable accommodations, and reasonable modifications.</td>
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</table>
### Public Sector

<table>
<thead>
<tr>
<th>Definition of Disability</th>
<th>Actions to Remove/Mitigate Impediments</th>
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</table>
| The Zoning Ordinance should define “disability” as broadly as the federal Fair Housing Act. The HUD-Los Angeles Field Office recommends that disability should be defined based on state law because California law provides broader protection than the federal law. | The City will consider revising the definition of disability as follows: 

**Action 1: Revise Definition of Disability**
- The Zoning Ordinance disability definition may be amended to delete reference to “substantially limits” and also include a reference to how the State law, which provides broader protections than the federal law, defines disability. |

### Transitional & Supportive Housing

<table>
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<tr>
<th>Definition of Disability</th>
<th>Actions to Remove/Mitigate Impediments</th>
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</table>
| The Zoning Ordinance requirements for transitional housing and supportive housing should be consistent with State law including SB 2 (2008), SB 745 (2014) and AB 2162 (2019) and best practices. | To be consistent with State law and best practices, the City will take the following action: 

**Action 1: Update Zoning Ordinance Requirements**
- The City will consider adding the affirmative statement that transitional and supportive housing “may be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.”
- Consider including transitional and supportive housing as permitted uses in the BAMU – Bellflower Mixed Use Overlay Zone
- Consider eliminating the requirements of Section 17.16.180 as they apply to transitional and supportive housing
- Incorporate the requirements of AB 2162 in the Zoning Ordinance |
Table II-2
City of Bellflower
Fair Housing Action Plan: FY 2020-2021 to FY 2024-2025
Actions to Remove/Mitigate Public Sector Fair Housing Impediments

<table>
<thead>
<tr>
<th>Reasonable Accommodation Procedure</th>
<th>Actions to Remove/Mitigate Impediments</th>
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<tbody>
<tr>
<td>The Reasonable Accommodation Procedure should be consistent with the guidance provided by the federal Departments of Justice and Housing and Urban Development, the State Department of Housing and Community Development, and best practices.</td>
<td>To achieve consistency with federal and state laws and guidance and best practices, the City will consider taking the following actions to eliminate the potential for creating an impediment to fair housing choice:</td>
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<tr>
<td><strong>Action 1: Amend the Reasonable Accommodation Procedure</strong></td>
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<tr>
<td>The City will consider amending the Reasonable Accommodation Procedure to update the disability definition, eliminate the fee requirement, and remove the public notice and public hearing requirements. In this endeavor, the City will request input from the Fair Housing Foundation. Additionally. The Reasonable Accommodation Procedure may be updated by October 2021, which is the due date for adoption of the 2021-2029 Housing Element.</td>
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<tr>
<td><strong>Action 2: Increase Marketing Efforts of the City’s Home Improvement Programs</strong></td>
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<tr>
<td>The City will increase its marketing efforts to target low and moderate-income households, special needs populations and minorities. Additional outreach efforts should be made to the disabled population who could benefit from accommodation improvements to their homes. Marketing efforts include providing materials at City counters, on the City’s website, and sending materials directly to residents who may be eligible.</td>
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### Private/Public Sector

<table>
<thead>
<tr>
<th>Location of Affordable Rental Housing Developments</th>
<th>Actions to Remove/Mitigate Impediments</th>
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<tbody>
<tr>
<td>Impediments to fair housing choice include:</td>
<td>The City will take the following actions to remove or mitigate these impediments to fair housing choice:</td>
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<tr>
<td>- There are few, if any, multifamily zoned sites in high resource neighborhoods.</td>
<td><strong>Action 1: Sites Inventory and Analysis</strong></td>
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<tr>
<td>- Access to opportunity is limited in moderate and low resource neighborhoods.</td>
<td>In FY 2020-2021, during the process of updating the Housing Element, the City will take the following actions:</td>
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<tr>
<td>- The absence of concerted community revitalization plans in the three Qualified Census Tracts impedes the development of affordable rental housing.</td>
<td>- Identify vacant and non-vacant residential sites located in the two high resource neighborhoods</td>
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<td>- Identify vacant and developed non-residential sites that can be re-zoned to residential use in the two high resource neighborhoods.</td>
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**Action 2: Create Place-Based Strategies that will improve Access to Opportunity in the Low and Moderate Resource Neighborhoods**

In FY 2021-2022, after the sites are identified, the City will consider implementing placed-based strategies in the moderate and low resource neighborhoods and Qualified Census Tracts. The strategies could include initiatives to reduce poverty, improve educational achievement, reduce unemployment and address other neighborhood needs. The purpose of the placed-based strategies is to improve the competitiveness of LIHTC applications for the development of affordable housing to be located in the moderate and low resource neighborhoods and three qualified census tracts.
### Table II-4
City of Bellflower

**Fair Housing Action Plan: FY 2020-2021 to FY 2024-2025**

**Actions to Affirmatively Further Fair Housing – Private Sector**

<table>
<thead>
<tr>
<th>Private Sector</th>
<th>Actions to AFFH</th>
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<tbody>
<tr>
<td><strong>Appraisal Practices</strong></td>
<td>Complaints regarding discriminatory appraisal practices are not routinely collected by local, State or Federal agencies. Data are unavailable to demonstrate if discriminatory appraisal practices have adversely impacted some of real estate transactions. Although no impediment was found to exist, the City will take following action to affirmatively further fair housing:</td>
</tr>
<tr>
<td><strong>Lending Patterns</strong></td>
<td>No impediment was determined regarding discriminatory lending practices. The City’s goal, however, is to improve the loan approval rates of all racial and ethnic households that want to buy a home located in Bellflower. The following action will be taken to affirmatively further fair housing:</td>
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<tr>
<td><strong>Homeowner's and Renter's Insurance</strong></td>
<td>The available data cannot demonstrate if the availability and cost of homeowner’s insurance is impediments to fair housing choice. To affirmatively further fair housing, the City will take following action:</td>
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**Action 1: Provide Information on the Appraisal Process at Consumer Fair Housing Workshops**

- In FY 2020-2021 to FY 2024-2025, the FHF will describe the appraisal process and the contents of an appraisal report at their Consumer Fair Housing Workshops.

**Action 1: Provide Information to Assist First-Time Homebuyers**

The City will encourage the FHF to provide, during their Consumer Fair Housing Workshops, information that assists first time homebuyers improve their knowledge of the home search and home buying process.

**Action 1: Provide Information on Homeowner’s and Renter’s Insurance**

- In FY 2020-2021 to FY 2024-2025, the FHF will include a discussion of homeowner’s and renter’s insurance in their Consumer Fair Housing Workshops.
### Table II-5
City of Bellflower
Fair Housing Action Plan: FY 2020-2021 to FY 2024-2025
Actions to Affirmatively Further Fair Housing – Private/Public Sector

<table>
<thead>
<tr>
<th>Demographics of Publicly Supported Housing</th>
<th>Actions to AFFH</th>
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| The demographics of individual developments have evolved since the projects were built and may change in the future when the turnover of owner- and renter-occupied housing occurs. It was determined that no impediment to fair housing choice exists because of the demographics of the occupants of LIHTC affordable housing developments. | The City will take the following actions affirmatively further fair housing –

**Action 1: Continue Affirmative Marketing Actions for HOME Units**

The City will continue to affirmatively market CDBG and HOME funded programs. Marketing efforts will include advertising housing programs in local publications. The City will continue to promote fair housing by ensuring outreach to all potential eligible households, especially those least likely to apply for housing assistance. Affirmative marketing will consist of providing information and otherwise attracting eligible persons to available housing without regard to race, color, national origin, sex, religion, familial status or disability.

The City will collect and maintain statistical information on race and ethnicity of applicants and assisted households to ensure all segments of the community are being served. |
SECTION III
FAIR HOUSING LEGAL STATUS
A. INTRODUCTION

HUD’s 1996 *Fair Housing Planning Guide* advises grantees to include information in the AI about:

- The number and types of complaints that have been filed alleging housing discrimination
- Complaints in which the Secretary of HUD has issued a charge of discrimination
- Suits that have been filed by the Department of Justice or private plaintiffs
- The reasons for any trends or patterns
- Discussion of other fair housing concerns

The City of Bellflower has been neither charged by HUD with a housing discrimination complaint nor subject to a lawsuit filed by the Department of Justice.

B. FAIR HOUSING COMPLAINTS

Housing discrimination complaints can be filed directly with HUD. In California, the housing discrimination complaints are processed by HUD’s San Francisco Office of Fair Housing and Equal Opportunity (FHEO). Bellflower residents may also file complaints with the State Department of Fair Employment and Housing (DFEH), and the Fair Housing Foundation (FHF).

Twenty-four Bellflower residents filed fair housing discrimination complaints with HUD between calendar year 2010 through May 2019. Table III-1 shows that the most frequent basis for the complaints were disability, race, familial status, and retaliation. Section IV provides definitions of these and other protected classes.

### Table III-1

*City of Bellflower*

*Housing Discrimination Complaints by Protected Class*

*2010 to May 2019*

*(Filed with U.S. Department of Housing and Urban Development)*

<table>
<thead>
<tr>
<th>Protected Class</th>
<th>Number of Cases</th>
<th>Percentage Distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability</td>
<td>7</td>
<td>29.3%</td>
</tr>
<tr>
<td>Race</td>
<td>5</td>
<td>20.8%</td>
</tr>
<tr>
<td>Familial Status</td>
<td>4</td>
<td>16.7%</td>
</tr>
<tr>
<td>Retaliation</td>
<td>4</td>
<td>16.7%</td>
</tr>
<tr>
<td>National Origin</td>
<td>2</td>
<td>8.3%</td>
</tr>
<tr>
<td>Sex</td>
<td>1</td>
<td>4.1%</td>
</tr>
<tr>
<td>Color</td>
<td>1</td>
<td>4.1%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>24</strong></td>
<td><strong>100.0%</strong></td>
</tr>
</tbody>
</table>

Source: U.S. Department of Housing and Urban Development, San Francisco Office Fair Housing and Equal Opportunity
In the past four fiscal years – FY 2015/16 to FY 2018/2019 – 63 fair housing inquiries or allegations have been filed with the Fair Housing Foundation. Almost 50% of the complaints were made on the basis of a physical or mental disability. However, the Fair Housing Foundation investigates some cases and often finds no evidence to sustain the allegations.

Table III-2
City of Bellflower
Fair Housing Inquiries/Allegations by Protected Class
FY 2015/2016 to FY 2018/2019
(Filed with the Fair Housing Foundation)

<table>
<thead>
<tr>
<th>Protected Class</th>
<th>Number of Cases</th>
<th>Percentage Distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability</td>
<td>36</td>
<td>57.1%</td>
</tr>
<tr>
<td>Familial Status</td>
<td>10</td>
<td>15.9%</td>
</tr>
<tr>
<td>Race</td>
<td>9</td>
<td>14.3%</td>
</tr>
<tr>
<td>Source of Income</td>
<td>3</td>
<td>4.8%</td>
</tr>
<tr>
<td>National Origin</td>
<td>2</td>
<td>3.2%</td>
</tr>
<tr>
<td>Gender</td>
<td>2</td>
<td>3.2%</td>
</tr>
<tr>
<td>Arbitrary</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Total</td>
<td>63</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: Fair Housing Foundation, Annual Reports, FY 2015/2016 to FY 2018/2019

C. SECRETARY-INITIATED COMPLAINTS

According to HUD, a Secretary-initiated complaint is filed when it has evidence that a discriminatory housing practice has occurred or is about to occur. HUD also may file a Secretary-initiated complaint when it has received an individual complaint, but believes there may be additional victims of the discriminatory act or wants to obtain broader relief in the public interest. For instance, in October 2019 HUD Secretary Ben Carson filed a formal complaint alleging that the City of Hesperia and the San Bernardino County Sheriff's Department violated the Fair Housing Act, discriminating against blacks and Hispanic residents.

None of the Secretary-initiated complaints have involved the City Bellflower, or local property owners, apartment managers and other private or public entities.

D. COMPLAINTS FILED AGAINST RECIPIENTS OF HUD FUNDS

HUD investigates discrimination complaints against recipients of HUD funds to determine whether the recipient violated civil rights laws or civil-rights related program requirements. At the conclusion of the investigation, HUD issues written findings of violations of civil rights laws or program requirements based on its investigation.

Table III-3 shows the numbers of complaints received in FY 2016 and FY 2017 that alleged discrimination or noncompliance by a recipient of HUD funds and the civil rights law that was allegedly violated. None of the filed complaints involved the City of Bellflower, which receives CDBG and HOME funds.
Table III-3
Complaints against Recipients of HUD Funds, FY 2016 and FY 2017

<table>
<thead>
<tr>
<th>Legal Basis for Complaint</th>
<th>Number of Complaints Filed</th>
<th>Number of Investigations Closed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2016</td>
<td>2017</td>
</tr>
<tr>
<td>Section 504</td>
<td>352</td>
<td>370</td>
</tr>
<tr>
<td>Title VI</td>
<td>163</td>
<td>155</td>
</tr>
<tr>
<td>Title II of ADA</td>
<td>84</td>
<td>118</td>
</tr>
<tr>
<td>Section 109</td>
<td>17</td>
<td>20</td>
</tr>
<tr>
<td>Age Discrimination Act</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Section 3</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>AFFH</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Total</td>
<td>618</td>
<td>667</td>
</tr>
</tbody>
</table>


The legal bases for the complaints are defined below:

- Section 504, Rehabilitation Act of 1974 prohibits discrimination against people with disabilities in programs that receive federal financial assistance.

- Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color, or national origin in programs or activities that receive federal financial assistance.

- Title II extends the prohibition of discrimination established in Section 504 of the Rehabilitation Act of 1973, as amended, to all activities of State and local governments regardless of whether these entities receive federal financial assistance.

- Section 109 prohibits discrimination in programs and activities receiving assistance under Title I of the Housing and Community Development Act of 1974.

- The Age Discrimination Act of 1975 prohibits discrimination on the basis of age in programs and activities receiving federal financial assistance. The Act applies to all ages.

- The Section 3 program requires that recipients of certain HUD financial assistance, to the greatest extent possible, provide training, employment, contracting and other economic opportunities to low- and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low- and very-low income persons.
E. COMPLIANCE REVIEWS OF RECIPIENTS OF HUD FUNDS

HUD conducts compliance reviews to determine whether a recipient of HUD funds is in compliance with applicable civil rights laws and their implementing regulations. HUD may initiate a compliance review whenever a report, complaint, or any other information indicates a possible failure to comply with applicable civil rights laws and regulations. HUD initiates most compliance reviews based on risk analysis, issues raised during a limited monitoring review, or when a civil rights problem is detected through HUD programming.

Table III-4 shows the number of compliance reviews that HUD initiated in FY 2016 and FY 2017 and the civil rights law under which they were conducted. In 2016 and 2017, HUD initiated 51 compliance reviews and closed 71 compliance reviews, respectively. HUD has not conducted a fair housing related compliance review of the City’s use of HUD funds and HUD did not comment on the City’s 2015-2020 Analysis of Impediments to Fair Housing Choice.

<table>
<thead>
<tr>
<th>Legal Basis for Complaint</th>
<th>Number of Compliance Reviews Initiated</th>
<th>Number of Compliance Reviews Closed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2016</td>
<td>2017</td>
</tr>
<tr>
<td>Section 504</td>
<td>2</td>
<td>5</td>
</tr>
<tr>
<td>Title VI</td>
<td>3</td>
<td>9</td>
</tr>
<tr>
<td>Title II of ADA</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Section 109</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Section 3</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>AFFH</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Total</td>
<td>8</td>
<td>20</td>
</tr>
</tbody>
</table>


F. FAIR HOUSING DISCRIMINATION SUITS FILED BY THE FEDERAL DEPARTMENT OF JUSTICE OR PRIVATE PLAINTIFFS AND THE CALIFORNIA DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

The Housing and Civil Enforcement Section of the Civil Rights Division of the federal Department of Justice (DOJ) is responsible for enforcement of the Fair Housing Act (FHA), along with the Equal Credit Opportunity Act, the Service members Civil Relief Act (SCRA), the land use provisions of the Religious Land Use and Institutionalized Persons Act (RLUIPA) and Title II of the Civil Rights Act of 1964, which prohibits discrimination in public accommodations.
Under the Fair Housing Act, the DOJ may bring lawsuits where it has reason to believe that a person or entity is engaged in a "pattern or practice" of discrimination or where a denial of rights to a group of persons raises an issue of general public importance.

The DOJ also brings cases where a housing discrimination complaint has been investigated by HUD and HUD has issued a charge of discrimination, and one of the parties to the case has "elected" to go to federal court.

In Fair Housing Act cases, the DOJ can obtain injunctive relief, including affirmative requirements for training and policy changes, monetary damages and, in pattern or practice cases, civil penalties.

The State Department of Fair Employment and Housing (DFEH) enforces California’s fair housing laws. The Department may bring law suits concerning the discriminatory practices of private and public persons and entities.

Descriptions of several cases are included in the following three pages. They illustrate the range of fair housing issues including discriminatory land use policies and practices, government housing policies and practices, and the discriminatory behavior of private owners, lenders, and local governments.

1. Discrimination Against African American Participants in the Section 8 Housing Choice Voucher Program - 2015

On July 28, 2015, the court approved a settlement agreement in United States v. Housing Authority of the County of Los Angeles (C.D. Cal.). The complaint, which was filed on July 20, 2015, alleged that the Housing Authority of the County of Los Angeles and the cities of Lancaster and Palmdale engaged in a pattern or practice of Fair Housing Act discrimination against African-American participants in the federal Section 8 Housing Choice Voucher Program living in the cities of Lancaster and Palmdale, CA. The settlement agreement provides for comprehensive reforms, a $1.975 million victim fund and a $25,000 civil penalty.

2. California Department of Fair Employment and Housing v. Riverside Mobile Home Park Owners - 2017

Residents of a Riverside mobile home park experienced discrimination and harassment by a manager of the park. A property manager harassed children at the park by taking pictures of them and by calling them, “Mexican -------.” The manager also issued a rule to the tenants stating that children would only be allowed to play in their own yards and not in the common areas of the park. The mobile home park owners agreed to pay $125,000 to the Fair Housing Council of Riverside County, Inc. (FHCRC) and to five Hispanic tenants who filed the complaint. The settlement also required the mobile home park to attend fair housing training, revise all housing rules that discriminate against Hispanic tenants and residents with children, and to post DFEH’s housing discrimination rights notices in Spanish and English.


On March 23, 2017, the court issued an order denying the defendant’s motion for summary judgment in Southwest Key Programs, Inc. v. City of Escondido (S.D. Cal.), finding that there were triable issues as to whether the group home at issue constitutes a dwelling under the Fair
Housing Act. The United States had filed a statement of interest in this case on November 3, 2016, to address the question whether the protections of the Fair Housing Act extend to group homes for unaccompanied children in the care and custody of the United States Department of Health and Human Services. The plaintiff in the case sought to operate such a home in the City of Escondido and alleges that the city discriminated on the basis of race and national origin when it denied the request for a conditional use permit to operate the group home. The defendant moved for summary judgment, arguing, among other things, that the Fair Housing Act does not apply. The United States’ statement of interest urged the court to find that the proposed group home is a “dwelling” covered by the Fair Housing Act and is neither a jail nor a detention facility.

4. California Department of Fair Employment and Housing v. Airbnb –2017

In April 2017, Airbnb entered into a settlement agreement with the California Department of Fair Employment and Housing to resolve a Department-initiated complaint alleging that Airbnb engaged in acts of housing discrimination and failed to prevent discrimination against Black guests in violation of California civil rights laws. Airbnb is an online community marketplace that connects people looking to rent their homes with people who are looking for accommodations. Under its terms, the Airbnb hosts and the guests in California are required to accept a recently implemented nondiscrimination policy as a condition for participating in Airbnb. The Department will conduct fair housing testing of Airbnb hosts in the state, and Airbnb California employees will receive fair housing and discrimination training. Airbnb has designated a unit to investigate all discrimination complaints, and this unit will submit periodic reports to the Department. Airbnb has also agreed to develop a progressive system of counseling, warning, and discipline for hosts and guests when unlawful discrimination occurs.

5. Discrimination Against Hispanic Homeowners Based on their National Origin –2019

The federal DOJ, through a series of settlements, resolved allegations that several California-based mortgage loan modification service providers engaged in national origin when they targeted Hispanic homeowners for predatory mortgage loan modification services and interfered with those individuals’ ability to keep their homes.

The Settlement Agreements resolved a lawsuit that the Department filed in the U.S. District Court for the Northern District of California. Among other relief, the agreements established a restitution fund of more than $148,000 to reimburse the discrimination victims for fees collected by defendants as part of the predatory scheme. The lawsuit arose from complaints filed with the HUD by two of the defendants’ former clients, Eberardo Perez and Roberto Hernandez, who intervened in the lawsuit along with their attorney, Housing & Economic Rights Advocates (HERA), and members of Hernandez’s family.

6. Group Home 600 Foot Spacing Requirement –2017

On November 28, 2017, the United States filed a complaint in United States v. City of Springfield (C.D. Ill.), alleging that the City violated the Fair Housing Act by imposing a 600-foot spacing requirement on small group homes for persons with disabilities, while not applying any spacing requirement to similarly situated housing for people without disabilities. The complaint further alleges that the City failed to provide a reasonable accommodation to a small group home that was located within 600 feet of another such home.
7. Discrimination Against Permanent Supportive Housing – 2017

On June 29, 2017, the court entered a consent decree in United States v. City of Jacksonville (M.D. Fla.). The complaint, which was filed on December 20, 2016, alleged that the City violated the Fair Housing Act and Americans with Disabilities Act when it refused to allow the development of a 12-unit apartment building to create “permanent supportive housing” for “chronically homeless” veterans, in response to intense community pressure based on stereotypes about prospective residents with disabilities. Under the consent decree, the City has amended its zoning code, including removing restrictions that apply to housing for persons with disabilities and implementing a reasonable accommodation policy. The City has also agreed to rescind the written interpretation that prevented Ability Housing from providing the housing at issue, designate a fair housing compliance officer, provide Fair Housing Act and Americans with Disabilities Act training for City employees, and pay a $25,000 civil penalty to the government. In a separate settlement, the City agreed to pay $400,000 to Ability Housing, a non-profit affordable housing provider, and $25,000 to Disability Rights Florida, an advocate for people with disabilities, and to establish a $1.5 million grant to develop permanent supportive housing in the City for people with disabilities.


On June 26, 2017, the court entered a consent decree in United States v. City of Jackson (S.D. Miss.). The complaint, which was filed on September 30, 2016, alleged that the city discriminated on the basis of disability in violation of the Fair Housing Act and Title II of the Americans with Disabilities Act by requiring the operator of a group home to close the home and force the residents to relocate. The consent decree requires the city to pay $100,000 to the owner of Urban Rehab, Inc., $35,000 to the department as a civil penalty, and $50,000 to a settlement fund that will compensate other victims. The city also agreed to revise its zoning code to permit persons in recovery to reside in all residential zones and to ease other restrictions on group homes for people with disabilities.

G. REASONS FOR ANY TRENDS OR PATTERNS

Recent trends at the national, state and local levels are listed below:

- Extending fair housing protections to, for example, the LGBTQ community and Native Americans and to people who live in HUD-assisted and FHA-insured housing.

- Protecting people with limited English speaking (LEP) proficiency under the category of national origin.

- Identifying gentrification and displacement as a fair housing issue because of its adverse impacts on low income people and people of color.

- Adding that Section 8 rental assistance is a verifiable source of income under the provisions of California’s Fair Employment and Housing Act.

- Continuing a trend in Bellflower of an increasing share of housing discrimination complaints being made on the basis of disability.
Emerging trends and issues cited by the National Fair Housing Alliance include:

- Improving Access to Credit for Persons and Neighborhoods of Color
- Expanding Protected Classes under the Fair Housing Act
- Gentrification and Fair Housing
- Big Data and Fair Housing
- Responsible Advertising in the Digital Advertising Space
- Accessibility, Affordability, and the Aging Population
- Addressing the Increase in Hate Crimes
- Incorporating Fair Housing into Disaster Recovery


In 2017 and 2018, the Department of Fair Employment and Housing (DFEH) focused intensively on increasing the accessibility of services for all Californians, including people with disabilities and people with limited English proficiency. The centerpiece of this effort was the November 2017 launch of the new case filing and case management system, Cal Civil Rights System (CCRS). The cloud-based platform allows members of the public and their representatives to submit complaints online for all of the civil rights laws DFEH enforces.

Source: California Department of Fair Employment and Housing, *2017 Annual Report*, August 2018, 36 pages
SECTION IV
CITY BACKGROUND DATA
A. INTRODUCTION

HUD’s 1996 *Fair Housing Planning Guide* advises grantees to include in the AI -jurisdictional background data: demographics, income, employment, housing profile and other relevant data. The existing conditions with respect to demographics, income, economic development and housing provide the context within which the fair housing protected classes can improve their well-being and attain housing within their means and in neighborhoods of their choice.

Bellflower encompasses an area of 6.1 square miles. In comparison to its six neighboring cities, Bellflower ranks fourth in population size and sixth in geographic area, but ranks first as the most dense with nearly 12,357 persons per square miles.

B. POPULATION AND HOUSEHOLD CHARACTERISTICS

Table IV-1 provides data on population and household characteristics in 2010 and 2019. During the almost nine-year time span, the population grew by almost 1,700 persons and the number of households (occupied housing units) increased by 174. The vacancy rate decreased to less than 5%.

C. EXISTING HOUSING STOCK

Table IV-2 shows approximately 25,000 housing units comprise the housing stock. Single-family detached and attached homes account for almost 60% of the housing stock. Multi-family housing in structures containing 10 or more dwellings comprises approximately one-fourth (25.7%) of the housing stock.

Multi-family housing (5+ units) constitutes the highest share (61.2%) of the dwellings added to the housing stock between 2010 and 2019. The increase in multifamily housing has enhanced housing diversity and furthers fair housing by providing a fuller range of housing choices. A diverse housing stock that is not exclusively single family homes fosters fair housing. Refer to Table IV-3 for the data on housing units added between 2010 and 2019.

D. HOMEOWNERSHIP

Homeownership is a key indicator of community and personal well-being because owning a home is often a household’s major asset, and home equity often contributes to a large share of wealth. Table IV-4 shows the 2000, 2010, and 2018 homeownership rates for the City of Bellflower, Los Angeles County, California and the nation. In all three periods, Bellflower had a lower home ownership rate than the County, the State and the nation. During the 2000-2018 period, the percentage of owner-occupied housing remained the same at 40%.

Bellflower probably should have a homeownership rate greater that 40% because single family detached and attached homes make up nearly 60% of its housing stock. But, as Table IV-5 reveals, 36.5% of all single family detached and attached homes are renter-occupied.
### Table IV-1
City of Bellflower
Population and Household Characteristics: 2010 and 2019

<table>
<thead>
<tr>
<th></th>
<th>April 1, 2010</th>
<th>January 1, 2019</th>
<th>Increase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>75,871</td>
<td>77,569</td>
<td>1,698</td>
</tr>
<tr>
<td>Group Quarters Population</td>
<td>739</td>
<td>739</td>
<td>0</td>
</tr>
<tr>
<td>Household Population</td>
<td>76,610</td>
<td>78,308</td>
<td>1,698</td>
</tr>
<tr>
<td>Total Population</td>
<td>24,896</td>
<td>25,056</td>
<td>160</td>
</tr>
<tr>
<td>Total Housing Units</td>
<td>23,650</td>
<td>23,824</td>
<td>174</td>
</tr>
<tr>
<td>Occupied Housing Units</td>
<td>1,246</td>
<td>1,232</td>
<td>-14</td>
</tr>
<tr>
<td>Vacant Housing Units</td>
<td>5.0%</td>
<td>4.92%</td>
<td>0.08%</td>
</tr>
<tr>
<td>Persons per Household</td>
<td>3.208</td>
<td>3.256</td>
<td>0.048</td>
</tr>
</tbody>
</table>


### Table IV-2
City of Bellflower
Housing Stock by Type of Unit: January 1, 2019

<table>
<thead>
<tr>
<th>Type of Unit</th>
<th>Number of Units</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 unit, detached</td>
<td>12,395</td>
<td>49.5%</td>
</tr>
<tr>
<td>1 unit, attached</td>
<td>2,079</td>
<td>8.3%</td>
</tr>
<tr>
<td>2 to 4 units</td>
<td>1,818</td>
<td>7.3%</td>
</tr>
<tr>
<td>5-9 units</td>
<td>1,021</td>
<td>4.1%</td>
</tr>
<tr>
<td>10-19 units</td>
<td>1,661</td>
<td>6.7%</td>
</tr>
<tr>
<td>20-49 units</td>
<td>2,935</td>
<td>11.7%</td>
</tr>
<tr>
<td>50 or more units</td>
<td>1,833</td>
<td>7.3%</td>
</tr>
<tr>
<td>Mobile homes, RV, Van, Etc.</td>
<td>1,314</td>
<td>5.1%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>25,056</strong></td>
<td><strong>100.0%</strong></td>
</tr>
</tbody>
</table>


2018 American Community Survey 1-Year Estimates, Table B25024, Units in Structure

The 2018 American Community Survey data on units in structure were used to calculate the number of units in structures containing 5 or more units.
Table IV-3
City of Bellflower
Housing Stock Increase by Type of Unit
April, 1, 2010 to January 1, 2019

<table>
<thead>
<tr>
<th>Type of Unit</th>
<th>Number of Units</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 unit, detached</td>
<td>40</td>
<td>25.0%</td>
</tr>
<tr>
<td>1 unit, attached</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>2 to 4 units</td>
<td>22</td>
<td>13.8%</td>
</tr>
<tr>
<td>5+ units</td>
<td>98</td>
<td>61.2%</td>
</tr>
<tr>
<td>Mobile homes, RV, Van, Etc.</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>Total</td>
<td>160</td>
<td>100.0%</td>
</tr>
</tbody>
</table>


Table IV-4
Comparison of Homeownership Rates by Year: 2000, 2010 and 2018

<table>
<thead>
<tr>
<th>Area</th>
<th>2000</th>
<th>2010</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bellflower</td>
<td>40.3%</td>
<td>40.0%</td>
<td>40.1%</td>
</tr>
<tr>
<td>Los Angeles County</td>
<td>47.9%</td>
<td>47.7%</td>
<td>45.3%</td>
</tr>
<tr>
<td>California</td>
<td>56.9%</td>
<td>55.9%</td>
<td>54.8%</td>
</tr>
<tr>
<td>Nation</td>
<td>66.2%</td>
<td>65.1%</td>
<td>63.9%</td>
</tr>
</tbody>
</table>

Source: 2000 Census of Population and Housing, Summary File 3, Housing Tenure
April 1, 2010 Census, Table DP-1 Profile of Population and Housing Characteristics: Housing Tenure
2018 American Community Survey 1-Year Estimates, Table B25003, Tenure

Table IV-5
City of Bellflower
Owner/Renter Occupancy of Single Family Homes: 2019

<table>
<thead>
<tr>
<th>Housing Type</th>
<th>Owner</th>
<th>Percent</th>
<th>Renter</th>
<th>Percent</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Family Detached</td>
<td>7,459</td>
<td>63.1%</td>
<td>4,354</td>
<td>36.9%</td>
<td>11,813</td>
</tr>
<tr>
<td>Single Family Attached</td>
<td>1,102</td>
<td>66.1%</td>
<td>566</td>
<td>33.9%</td>
<td>1,668</td>
</tr>
<tr>
<td>Total</td>
<td>8,561</td>
<td>63.5%</td>
<td>4,920</td>
<td>36.5%</td>
<td>13,481</td>
</tr>
</tbody>
</table>

Source: 2018 American Community Survey 1-Year Estimates, Table B25032, Tenure by Units in Structure
E. HOUSEHOLD INCOME

Fair housing choice, according to HUD, means the ability of persons of similar income levels regardless of race, color, religion, sex, national origin, familial status and disability to have available to them the same housing choices. This means, for instance, those households of different races but with similar income levels should have available to them the same housing choices. Another example is that female householders, male householders and married couples with similar income levels should have available to them the same housing choices. A housing market that treats female and male householders with incomes of $60,000 differently would not be providing fair housing choice.

Household income has a positive impact on enabling people to find the housing of their choice. As incomes become higher, a fuller range of housing choice with respect to type, cost and neighborhood location become available to them.

Table IV-6 shows the number and percentages of households in five income groups by tenure. Approximately 63% of Bellflower’s 23,240 households have lower incomes, which makes them eligible to participate in the City’s CDBG- and HOME-funded programs. Extremely low income renters comprise 17.2% of all the City’s households (4,000/23,240). The largest income group (almost 4,200) is above moderate income owners.

### Table IV-6
City of Bellflower
Household Income by Tenure: 2012-2016

<table>
<thead>
<tr>
<th>Household Income</th>
<th>Owner</th>
<th>Percent</th>
<th>Renter</th>
<th>Percent</th>
<th>Total</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Extremely Low</td>
<td>885</td>
<td>9.8%</td>
<td>4,000</td>
<td>28.2%</td>
<td>4,885</td>
<td>21.0%</td>
</tr>
<tr>
<td>Very Low</td>
<td>1,015</td>
<td>11.3%</td>
<td>3,275</td>
<td>23.0%</td>
<td>4,290</td>
<td>18.5%</td>
</tr>
<tr>
<td>Low</td>
<td>1,780</td>
<td>19.7%</td>
<td>3,725</td>
<td>26.2%</td>
<td>5,505</td>
<td>23.7%</td>
</tr>
<tr>
<td>Moderate(^1)</td>
<td>1,135</td>
<td>12.6%</td>
<td>1,285</td>
<td>9.0%</td>
<td>2,420</td>
<td>10.4%</td>
</tr>
<tr>
<td>Above Moderate(^2)</td>
<td>4,195</td>
<td>46.6%</td>
<td>1,940</td>
<td>13.6%</td>
<td>6,135</td>
<td>26.4%</td>
</tr>
<tr>
<td>Total</td>
<td>9,015</td>
<td>100.0%</td>
<td>12,225</td>
<td>100.0%</td>
<td>23,240</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Extremely Low: Less than or = 30% HAMFI
Very Low: >30% to less than or = 50% HAMFI
Low: >50% to less than or = 80% HAMFI
Moderate: >80% to less than or = 100% HAMFI
Above Moderate: >100% HAMFI
HAMFI refers to HUD Area Median Family Income

Sources: Comprehensive Housing Affordability Strategy (−CHASI) Data, based on the 2012-2016 American Community Survey and Census 2010
The data on household income and tenure are based on the five-year period from 2012 to 2016. The mid-point of this period is 2014. Table IV-7 shows HUD’s 2014 annual income limits, adjusted by household size, for extremely low-, very low- and low-income households.

### Table IV--7

<table>
<thead>
<tr>
<th>Number of Persons</th>
<th>Extremely Low</th>
<th>Very Low</th>
<th>Low</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$17,150</td>
<td>$28,550</td>
<td>$45,650</td>
</tr>
<tr>
<td>2</td>
<td>$19,600</td>
<td>$32,600</td>
<td>$52,200</td>
</tr>
<tr>
<td>3</td>
<td>$22,050</td>
<td>$36,700</td>
<td>$58,700</td>
</tr>
<tr>
<td>4</td>
<td>$24,450</td>
<td>$40,750</td>
<td>$65,200</td>
</tr>
<tr>
<td>5</td>
<td>$27,910</td>
<td>$44,050</td>
<td>$70,450</td>
</tr>
<tr>
<td>6</td>
<td>$31,970</td>
<td>$47,300</td>
<td>$75,650</td>
</tr>
<tr>
<td>7</td>
<td>$36,030</td>
<td>$50,550</td>
<td>$80,850</td>
</tr>
<tr>
<td>8</td>
<td>$40,090</td>
<td>$53,800</td>
<td>$86,100</td>
</tr>
</tbody>
</table>

Source: U.S. Department of Housing and Urban Development, FY 2014 Income Limits

Table IV-6 indicates that 4,000 extremely low income renters live in Bellflower. A 4-person extremely low income family would have an annual income of approximately $24,000 or less. This annual family income is essentially the poverty threshold for a family of four persons that includes two children.

### F. POVERTY

People who are classified as living in poverty are unable to secure housing in neighborhoods that offer opportunities such as superior schools and proximity to good parks and other amenities. Poverty measures the lack of income.

In accordance with the Consolidated Plan Final Rule, the City’s FY 2020/2021-FY2024/2025 Consolidated Plan describes an anti-poverty strategy.

Measuring poverty is a two-step process:

- Establishing a poverty threshold which is the amount of money needed to achieve a minimum level of material well-being.
- Estimating families’ cash and non-cash resources and comparing them to the poverty threshold to determine whether a family is below it and, therefore, defined as -poor-.

Examples of official 2018 poverty thresholds are:

- 1 person less than 65 years of age $13,064
- 2 people, householder less than 65 years of age $16,889
- 3 people, 1 child less than 18 years of age $20,212
- 4 people, 2 children less than 18 years of age $25,465
Approximately 13% of all Bellflower residents live in households with annual incomes below the poverty level. The lowest poverty rates are experienced by married couple families with and without children. Female householder with children experience the highest poverty rate of 28.5%, which is slightly higher than that of male householders with children. Refer to Table IV-8.

**Table IV-8**
**City of Bellflower**
**Poverty Status by Familial Status and Presence of Children-2017**

<table>
<thead>
<tr>
<th>Family Type</th>
<th>Percent Below Poverty Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Married Couple Families</td>
<td>7.3%</td>
</tr>
<tr>
<td>With related children under 18 years</td>
<td>11.4%</td>
</tr>
<tr>
<td>With no related children under 18 years</td>
<td>3.1%</td>
</tr>
<tr>
<td>Male Householder, No Wife Present</td>
<td>14.7%</td>
</tr>
<tr>
<td>With related children under 18 years</td>
<td>24.5%</td>
</tr>
<tr>
<td>With no related children under 18 years</td>
<td>6.4%</td>
</tr>
<tr>
<td>Female Householder, No Husband Present</td>
<td>19.3%</td>
</tr>
<tr>
<td>With related children under 18 years</td>
<td>28.5%</td>
</tr>
<tr>
<td>With no related children under 18 years</td>
<td>9.4%</td>
</tr>
</tbody>
</table>

Source: 2013-2017 American Community Survey 5-Year Estimates, Table B17023, Poverty Status in the Past 12 Months of Families by Household Type by Number of Own Children Under 18 Years

Table IV-9 reports on additional poverty statistics based on the official and California Poverty Measure (CPM) for the Bellflower/Paramount sub-region. The CPM accounts for how the social safety net – specifically, Cal Fresh, CalWORKS, the Earned Income Tax Credit (EITC) and other means-tested programs - moderates poverty. The CPM poverty rate is higher than the official poverty rate. Without the benefits of federal safety net programs, the poverty rate would be significantly higher than the official poverty rate (+10.3%).

Safety net programs are meant to be a safety net to protect low-income families from poverty and hardship and catch them if they fall on hard times.

CalFresh is California’s name for the Supplemental Nutrition Assistance Program (SNAP), the largest federally supported nutrition assistance program. CalFresh provides a monthly benefit that participating low-income families can use to buy groceries.

CalWORKs is the California Work Opportunity and Responsibility to Kids program, a federal cash assistance program for low-income families with dependent children (the federal name for the program is Temporary Assistance for Needy Families or TANF). The program provides a monthly benefit to eligible applicants and service to help parents move their families toward self-sufficiency.
Table IV-9  
Bellflower/Paramount Poverty Indicators: 2015-2017

<table>
<thead>
<tr>
<th>Poverty Indicator</th>
<th></th>
<th>East</th>
</tr>
</thead>
<tbody>
<tr>
<td>CPM poverty</td>
<td>Rate</td>
<td>24.5%</td>
</tr>
<tr>
<td></td>
<td>Rate margin of error (% pt)</td>
<td>4.5</td>
</tr>
<tr>
<td></td>
<td>Number</td>
<td>28,900</td>
</tr>
<tr>
<td></td>
<td>Number margin of error</td>
<td>5,300</td>
</tr>
<tr>
<td>Official poverty</td>
<td>Rate</td>
<td>15.7%</td>
</tr>
<tr>
<td></td>
<td>Rate margin of error (% pt)</td>
<td>3.6</td>
</tr>
<tr>
<td>CPM poverty threshold, family of 4 that rents</td>
<td>($)</td>
<td>$32,161</td>
</tr>
<tr>
<td>Increase in poverty without safety net</td>
<td>Increase (% pt)</td>
<td>10.3</td>
</tr>
<tr>
<td></td>
<td>Margin of error (% pt)</td>
<td>3.3</td>
</tr>
<tr>
<td>Increase in poverty without CalFresh</td>
<td>Increase (% pt)</td>
<td>3.3</td>
</tr>
<tr>
<td></td>
<td>Margin of error (% pt)</td>
<td>2.5</td>
</tr>
<tr>
<td>Increase in poverty without CalWORKs</td>
<td>Increase (% pt)</td>
<td>2.9</td>
</tr>
<tr>
<td></td>
<td>Margin of error (% pt)</td>
<td>2.0</td>
</tr>
<tr>
<td>Increase in poverty without federal and state EITCs</td>
<td>Increase (% pt)</td>
<td>3.2</td>
</tr>
<tr>
<td></td>
<td>Margin of error (% pt)</td>
<td>2.2</td>
</tr>
</tbody>
</table>

Source: Public Policy Institute of California and Stanford Center on Poverty and Inequality, Poverty Across California, 2015-2017

The Earned Income Tax Credit is a federal tax credit available to families with dependent children who file a tax return. A small credit is available to low-income workers with no dependents. All family members must file with a social security number to be eligible for this credit. The credit is fully refundable, meaning that tax filers with no net tax liability receive the full amount for which they are eligible. The State of California has a similar program. Attachment A describes three distinct poverty measures.

G. LABOR FORCE AND EMPLOYMENT CHARACTERISTICS

Having a job and earning income is a prerequisite to enabling families to find housing of their choice, that is within their means, and that is located in neighborhoods they and their children like. Housing choice for all racial and ethnic groups is diminished when unemployment rates are high because they depress household income and increase the number of poverty income families.

Key labor force and employment terms are defined below:

**Labor Force** – All people classified in the civilian labor force plus members of the U.S. Armed Forces (people on active duty with the United States Army, Air Force, Navy, Marine Corps, or Coast Guard).

**Labor Force Participation Rate** – The labor force participation rate represents the proportion of the population that is in the labor force. For example, if there are 100 people in the population 16 years and over, and 64 of them are in the labor force, then the labor force participation rate for the population 16 years and over is 64%.
Not in Labor Force – All people 16 years old and over who are not classified as members of the labor force. This category consists mainly of students, homemakers, retired workers, seasonal workers interviewed in an off season who were not looking for work, institutionalized people, and people doing only incidental unpaid family work (less than 15 hours during the reference week).

Unemployment Rate – The unemployment rate represents the number of unemployed people as a percentage of the civilian labor force. For example, if the civilian labor force equals 100 people and 7 people are unemployed, then the unemployment rate is 7%.

Bellflower’s civilian labor force ranges approximately between 59,600 and 60,300 persons 16 years of age or older, resulting in a labor force participation rate of between 63% and 70%. The number of unemployed persons ranges between approximately 2,700 and 3,200, resulting in an unemployment rate between 7.2% and 7.6%. The City’s unemployment rate, though, has been gradually decreasing in recent years. Refer to Table IV-10.

Table IV-10
City of Bellflower

<table>
<thead>
<tr>
<th></th>
<th>2013-2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population 16 years and over</td>
<td>60,258</td>
<td>59,627</td>
</tr>
<tr>
<td>In Civilian Labor Force*</td>
<td>37,854</td>
<td>42,123</td>
</tr>
<tr>
<td>% in Civilian Labor Force</td>
<td>62.8%</td>
<td>70.6%</td>
</tr>
<tr>
<td>Not in Civilian Labor Force</td>
<td>22,404</td>
<td>17,504</td>
</tr>
<tr>
<td>% Not in Civilian Labor Force</td>
<td>37.2%</td>
<td>29.4%</td>
</tr>
<tr>
<td>In Civilian Labor Force, Unemployed</td>
<td>2,717</td>
<td>3,192</td>
</tr>
<tr>
<td>Civilian Unemployment Rate</td>
<td>7.2%</td>
<td>7.6%</td>
</tr>
</tbody>
</table>

*Does not include persons in the Armed Forces
Source: 2018 American Community Survey, 1-Year Estimates, Table B23025, Employment Status of the Population 16 Years and Over

Table IV-11 provides data on the industrial composition of the City’s approximately 17,600 jobs.

The industry sectors with the largest number of jobs include education, leisure and retail trade.

The industry sectors with the largest job gains over the past decade include education and retail trade.

The industry sector definitions are based on the North American Industry Classification System (NAICS). The Southern California Association of Governments (SCAG) has summarized the detailed NAICS definitions into several major areas. Attachment B provides brief descriptions of the major industries.
<table>
<thead>
<tr>
<th>Job Sector</th>
<th>2007 Number</th>
<th>2007 Percent</th>
<th>2017 Number</th>
<th>2017 Percent</th>
<th>Net Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public</td>
<td>215</td>
<td>1.3%</td>
<td>475</td>
<td>2.7%</td>
<td>260</td>
</tr>
<tr>
<td>Wholesale</td>
<td>480</td>
<td>2.9%</td>
<td>722</td>
<td>4.1%</td>
<td>242</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>960</td>
<td>5.8%</td>
<td>335</td>
<td>1.9%</td>
<td>-625</td>
</tr>
<tr>
<td>Transportation</td>
<td>545</td>
<td>3.3%</td>
<td>686</td>
<td>3.9%</td>
<td>141</td>
</tr>
<tr>
<td>Information</td>
<td>728</td>
<td>4.4%</td>
<td>423</td>
<td>2.4%</td>
<td>-305</td>
</tr>
<tr>
<td>Other¹</td>
<td>1,423</td>
<td>8.6%</td>
<td>1,162</td>
<td>6.6%</td>
<td>-261</td>
</tr>
<tr>
<td>Leisure</td>
<td>2,184</td>
<td>13.2%</td>
<td>2,378</td>
<td>13.5%</td>
<td>194</td>
</tr>
<tr>
<td>Retail</td>
<td>1,655</td>
<td>10.0%</td>
<td>2,237</td>
<td>12.7%</td>
<td>582</td>
</tr>
<tr>
<td>Construction</td>
<td>860</td>
<td>5.2%</td>
<td>792</td>
<td>4.5%</td>
<td>-68</td>
</tr>
<tr>
<td>Education</td>
<td>4,964</td>
<td>30.0%</td>
<td>6,146</td>
<td>34.9%</td>
<td>1,182</td>
</tr>
<tr>
<td>Finance</td>
<td>1,158</td>
<td>7.0%</td>
<td>1,285</td>
<td>7.3%</td>
<td>127</td>
</tr>
<tr>
<td>Professional²</td>
<td>1,373</td>
<td>8.3%</td>
<td>968</td>
<td>5.5%</td>
<td>-405</td>
</tr>
<tr>
<td>Total</td>
<td>16,545</td>
<td>100.0%</td>
<td>17,609</td>
<td>100.0%</td>
<td>1,064</td>
</tr>
</tbody>
</table>

Note: The above is an estimate of the number of jobs located within the City limits per a communication from SCAG staff.
Source: Southern California Association of Governments, City of Bellflower Local Profile Report, May 2019, pages 24 and 27
H. PRINCIPAL EMPLOYERS

Table IV-12 lists the principal employers located in Bellflower. Four of the 10 principal employers provide healthcare services. One of the 10 principal employers has more than 300 employees.

Table IV-12
City of Bellflower
Principal Employees: FY2017-2018

<table>
<thead>
<tr>
<th>Employer</th>
<th>Employees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Kaiser Permanente Medical Group</td>
<td>339</td>
</tr>
<tr>
<td>City of Bellflower</td>
<td>222</td>
</tr>
<tr>
<td>Cerritos Vista Healthcare Center</td>
<td>146</td>
</tr>
<tr>
<td>Tulaphorn Inc.</td>
<td>136</td>
</tr>
<tr>
<td>George Chevrolet</td>
<td>135</td>
</tr>
<tr>
<td>Hollywood Sports Park</td>
<td>129</td>
</tr>
<tr>
<td>Bellflower Post-Acute LLC</td>
<td>122</td>
</tr>
<tr>
<td>Bel Tooren Vila Convalescent</td>
<td>114</td>
</tr>
<tr>
<td>Norm’s Restaurant LLC</td>
<td>111</td>
</tr>
<tr>
<td>Golden Corral</td>
<td>103</td>
</tr>
</tbody>
</table>

Source: City of Bellflower, California Comprehensive Annual Financial Report for Fiscal Year Ended June 30, 2018, Principal Employers Current Fiscal Year, page 185

I. COMMUTING PATTERNS

Approximately 6% percent of the City’s workforce both live and work in Bellflower. Table IV-13 reveals that the City’s residents have numerous work destinations. About one in six residents work in Los Angeles.

Long commutes can cause unusually high transportation costs and reduce the amount of income that can be allocated to housing costs. According to SCAG data, between 2000 and 2018, the average one-way travel time to work remained the same at 30 minutes. That means, however, that one-half of Bellflower commuters spend more than 30 minutes to travel to work. In fact, almost one-fourth of the City workers had one-way commutes of 45 minutes or longer.
Table IV-13
Top Places Where Residents Commute to Work: 2015

<table>
<thead>
<tr>
<th>Place</th>
<th>Number of Commuters</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Los Angeles</td>
<td>4,916</td>
<td>16.6%</td>
</tr>
<tr>
<td>Long Beach</td>
<td>2,610</td>
<td>8.8%</td>
</tr>
<tr>
<td>Bellflower</td>
<td>1,832</td>
<td>6.2%</td>
</tr>
<tr>
<td>Cerritos</td>
<td>813</td>
<td>2.7%</td>
</tr>
<tr>
<td>Downey</td>
<td>813</td>
<td>2.7%</td>
</tr>
<tr>
<td>Santa Fe Springs</td>
<td>782</td>
<td>2.6%</td>
</tr>
<tr>
<td>Anaheim</td>
<td>757</td>
<td>2.6%</td>
</tr>
<tr>
<td>Lakewood</td>
<td>668</td>
<td>2.3%</td>
</tr>
<tr>
<td>Paramount</td>
<td>649</td>
<td>2.2%</td>
</tr>
<tr>
<td>Carson</td>
<td>626</td>
<td>2.1%</td>
</tr>
<tr>
<td>All Other Destinations*</td>
<td>15,220</td>
<td>51.2%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>29,686</strong></td>
<td><strong>100.0%</strong></td>
</tr>
</tbody>
</table>

Note: does not sum to 100% due to rounding
*Does not include workers working in the City of Bellflower
Southern California Association of Governments, Profile of the City of Bellflower, May 2019, page 21

J. EDUCATIONAL ATTAINMENT

Higher incomes enable households to more effectively acquire housing of their choice and within their means. Moreover, householders with higher levels of educational achievement, on average, have higher earnings. One of the ways to improve economic well-being is through educational attainment: better educated and skilled residents earn higher wages.

Table IV-14 indicates the educational attainment of the population 25 years of age and older. Almost 18% of the population has a Bachelor’s, Graduate or Professional Degree. Approximately 21% of the population is not a high school graduate.

Table IV-15 demonstrates that median earnings increase as a higher level of educational attainment is achieved. The median earnings of a person with a Bachelor’s degree are $30,000 higher than of a person who did not graduate from high school.
Table IV-14  
City of Bellflower  
**Educational Attainment for the Population 25 Years and Over: 2018**

<table>
<thead>
<tr>
<th>Educational Attainment</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>8th Grade or Less</td>
<td>5,619</td>
<td>11.0%</td>
</tr>
<tr>
<td>9th-11th Grades</td>
<td>3,305</td>
<td>6.4%</td>
</tr>
<tr>
<td>12th Grade, No Diploma</td>
<td>2,026</td>
<td>4.0%</td>
</tr>
<tr>
<td>High School Graduate</td>
<td>12,275</td>
<td>23.9%</td>
</tr>
<tr>
<td>Some College</td>
<td>13,752</td>
<td>26.9%</td>
</tr>
<tr>
<td>Associate’s Degree</td>
<td>5,195</td>
<td>10.1%</td>
</tr>
<tr>
<td>Bachelor’s Degree</td>
<td>6,236</td>
<td>12.2%</td>
</tr>
<tr>
<td>Master’s Degree</td>
<td>2,326</td>
<td>4.5%</td>
</tr>
<tr>
<td>Doctorate Degree</td>
<td>331</td>
<td>0.6%</td>
</tr>
<tr>
<td>Professional Degree</td>
<td>202</td>
<td>0.4%</td>
</tr>
<tr>
<td>Total</td>
<td>51,267</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2017 American Community Survey 1-Year Estimates, Table B15002, Sex by Educational Attainment for the Population 25 Years and Over

Table IV-15  
City of Bellflower  
**Median Earnings by Educational Attainment: 2018**

<table>
<thead>
<tr>
<th>Educational Attainment</th>
<th>2018 ACS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than High School Graduate</td>
<td>$24,530</td>
</tr>
<tr>
<td>High School Graduate</td>
<td>$31,269</td>
</tr>
<tr>
<td>Some College or Associate’s Degree</td>
<td>$36,854</td>
</tr>
<tr>
<td>Bachelor’s Degree</td>
<td>$54,628</td>
</tr>
<tr>
<td>Graduate or Professional Degree</td>
<td>$72,492</td>
</tr>
</tbody>
</table>

Average earning: $40,867  
Measuring poverty is typically a two-step process. First, researchers create a poverty threshold—a representation of the amount of resources necessary to achieve a minimum level of material well-being. Second, they estimate families’ resources and compare them to the poverty threshold to determine whether a family is below it (and therefore defined as “poor”). Poverty then refers to persons who are income poor and, perhaps, have no income at all. It also refers to a measure of economic need.

The three poverty measures are:

- Official Poverty Measure (OPM)
- Supplemental Poverty Measure (SPM)
- California Poverty Measure (CPM)

1. OFFICIAL POVERTY MEASURE (OPM)

When the original poverty definition was developed in 1964 by the Social Security Administration (SSA), it focused on family food consumption. The U.S. Department of Agriculture (USDA) used its data about the nutritional needs of children and adults to construct food plans for families. Within each food plan, dollar amounts varied according to the total number of people in the family and the family’s composition, that is, the number of children within each family. The cheapest of these plans, the Economy Food Plan, was designed to address the dietary needs of families on an austere budget.

Since the USDA’s 1965 Food Consumption Survey showed that families of three or more people across all income levels spent roughly one-third of their income on food, the SSA multiplied the cost of the Economy Food Plan by three to obtain dollar figures for total family income. These dollar figures, with some adjustments, later became the official poverty thresholds. Since the Economy Food Plan budgets varied by family size and composition, so too did the poverty thresholds. For two-person families, the thresholds were adjusted by slightly higher factors because those households had higher fixed costs. Thresholds for unrelated individuals were calculated as a fixed proportion of the corresponding thresholds for two-person families.

The poverty thresholds are revised annually to allow for changes in the cost of living as reflected in the Consumer Price Index for All Urban Consumers (CPI-U). The poverty thresholds are the same for all parts of the country; they are not adjusted for regional, state, or local variations in the cost of living.

Poverty status is determined for all people except institutionalized people, people in military group quarters, people in college dormitories, and unrelated individuals under 15 years old. These groups are excluded from the numerator and denominator when calculating poverty rates.

2. SUPPLEMENTAL POVERTY MEASURE (SPM)

The U.S. Census Bureau has conducted research on a Supplemental Poverty Measure (SPM). The official poverty measure, as defined by the Office of Management and Budget (OMB) Statistical Directive No. 14, will not be replaced by the SPM. The reason is that the official measure is identified in legislation regarding program eligibility and funding distribution. The
SPM is designed to provide information on aggregate levels of economic need at a national level or within large subpopulations or areas.

The SPM compares costs to family resources, as follows:

**FCSU** — a dollar amount spent on food, clothing, shelter and utilities plus a small amount to allow for other needs such as household supplies, personal care, and non-work-related transportation.

**Family resources** — the sum of cash income plus any federal government noncash benefits that families can use to meet their FCSU needs minus taxes (plus tax credits), work expenses, child care expenses, and medical out-of-pocket (MOOP) expenses. Examples of federal government noncash benefits include Supplemental Nutritional Assistance (SNAP), National School Lunch Program, Supplementary Nutrition Program for Women, Infants and Children (WIC), housing subsidies, and Lower Income Home Energy Assistance Program (LIHEAP).

The Supplemental Poverty Measure is calculated as the 33rd percentile of expenditures on food, clothing, shelter, and utilities (FCSU) of consumer units with two children multiplied by 1.2.

### 3. THE CALIFORNIA POVERTY MEASURE (CPM)

A joint project of the Public Policy Institute of California and the Stanford University Center on Poverty and Income, the California Poverty Measure (CPM) is part of a national effort to measure poverty in a more comprehensive way. According to its authors —

The CPM illuminates the important role of the social safety net — specifically, Cal Fresh, CalWORKS, the Earned Income Tax Credit (EITC) and other means-tested programs - in moderating poverty.

The CPM measures poverty as follows:

A family is considered to be poor if its resources fall short of the poverty threshold. The CPM combines a family’s annual cash income (including earnings and government-provided cash benefits like CalWORKs), its tax obligation—a net income boost to low-income families that qualify for tax credits—and in-kind benefits like CalFresh. (The official poverty calculus includes only the first category of resources, cash income.) It then subtracts major nondiscretionary expenses. Finally, the CPM compares these resources to a family-specific poverty threshold—the monetary resources needed to maintain a basic standard of living. Unlike official poverty thresholds, CPM thresholds are pegged to recent nationwide spending levels on food, shelter, clothing, and utilities and are further adjusted to account for differences in housing costs across counties and to differentiate among those who are renting, paying a mortgage, or living in a paid-off home.

In summary, the Public Policy Institute of California explains:

The CPM accounts for the fact that, for most Californians, high living costs—particularly housing costs—offset the resources they have available to make ends meet. We also factor in expenses that eat into resources and drive up poverty, particularly medical
expenses borne by older adults. Work expenses such as commuting costs and childcare also play a role in raising the poverty rate under the CPM.

At the same time, we find that government programs play a substantial role in alleviating poverty. In the absence of cash-based, in-kind, and tax-based safety net programs, our estimate of child poverty would be 39.0 percent, 13.9 percentage points higher than the actual estimate of 25.1 percent. For working-age and older adults, the combined role of these programs was smaller, but still considerable.


In 2017, the statewide poverty rates based on the CPM by race and ethnicity are listed below:

- White, Non-Hispanic 12.5%
- Asian/Pacific Islanders 16.4%
- Black, Non-Hispanic 17.6%
- Other 18.5%
- Hispanic 23.6%

Though poverty among Latinos is down from 30.9% in 2011, Latinos remain disproportionately poor (making up 52.2% of poor Californians but 39.4% of all Californians). More education continues to be associated with strikingly lower poverty rates: 7.8% of adults age 25–64 with a college degree were in poverty, compared with 31.8% of those without a high school diploma.

Source: Public Policy Institute of California, *Poverty in California*, July 2019, 3 pages
ATTACHMENT B
INDUSTRY DEFINITIONS

The data sources for estimating jurisdiction employment and wage information include the 2010 U.S. Census Bureau Local Employment Dynamics Survey, and information from the California Employment Development Department, InfoGroup, and SCAG for years 2007-2017. In many instances, employment totals from individual businesses were geocoded and aggregated to the jurisdictional level.

Employment information by industry type is defined by the North American Industry Classification System (NAICS). Although the NAICS provides a great level of detail on industry definitions for all types of businesses in North America, for the purposes of this report, this list of industries has been summarized into the following major areas: agriculture, construction, manufacturing, wholesale, retail, information, finance/insurance/real estate, professional/management, education/health, leisure/hospitality, public administration, other services, and non-classified industries. A brief description of each major industry area is provided below:

- **Agriculture**: Includes crop production, animal production and aquaculture, forestry and logging, fishing, hunting, and trapping, and support activities for agriculture and forestry.
- **Construction**: Includes activities involving the construction of buildings, heavy and civil engineering construction, and specialty trade contractors.
- **Manufacturing**: Includes the processing of raw material into products for trade, such as food manufacturing, apparel manufacturing, wood product manufacturing, petroleum and coal products manufacturing, chemical manufacturing, plastics and rubber products manufacturing, nonmetallic mineral product manufacturing and primary metal manufacturing.
- **Wholesale**: Includes activities conducting the trade of raw materials and durable goods.
- **Retail**: Includes activities engaged in the sale of durable goods directly to consumers.
- **Information**: Includes activities that specialize in the distribution of content through a means of sources, including newspaper, internet, periodicals, books, software, motion pictures, sound recording, radio and television broadcasting, cable or subscription programming, telecommunications, data processing/hosting, and other information media.
- **Finance/Insurance/Real Estate**: Includes businesses associated with banking, consumer lending, credit intermediation, securities brokerage, commodities exchanges, health/life/medical/title/property/casualty insurance agencies and brokerages, and real estate rental/leasing/sales.
- **Professional/Management**: Includes activities that specialize in professional/scientific/technical services, management of companies and enterprises, and administrative and support services. Establishment types may include law offices, accounting services, architectural/engineering firms, specialized design services, computer systems design and related services, management consulting firms, scientific research and development services, advertising firms, office administrative services, and facilities support services.
- **Education/Health**: Organizations include elementary and secondary schools, junior colleges, universities, professional schools, technical and trade schools, medical offices, dental offices, outpatient care centers, medical and diagnostic laboratories, hospitals,
nursing and residential care facilities, social assistance services, emergency relief services, vocational rehabilitation services, and child day care services.

- **Leisure/Hospitality**: Includes activities involved in the performing arts, spectator sports, museums, amusement/recreation, travel accommodations, and food and drink services.

- **Public Administration**: Includes public sector organizations, such as legislative bodies, public finance institutions, executive and legislative offices, courts, police protection, parole offices, fire protection, correctional institutions, administration of governmental programs, space research and technology, and national security.

- **Other Services**: Includes, for example, automotive repair and maintenance, personal and household goods repair and maintenance, personal laundry services, dry-cleaning and laundry services, religious services, social advocacy organizations, professional organizations, and private households.

- **Non-Classified**: All other work activities that are not included in the North American Industry Classification System.
SECTION V
FAIR HOUSING PROTECTED GROUPS
A. INTRODUCTION

1. Introduction

A “protected class” is a group of people with a common characteristic who are legally protected from housing discrimination on the basis of that characteristic. Protected classes are created by both federal and state law. The protected classes under federal law include:

- Race
- Color
- Religion
- Sex
- National Origin
- Familial Status
- Handicap/Disability

The Fair Housing Act prohibits both intentional discrimination and policies and practices that discriminate against the seven protected classes/groups. According to HUD’s Office of General Counsel (OGC), people with limited English proficiency (LEP) are not a protected class under the Fair Housing Act. However, the OGC explains that there is a close link between LEP and certain racial and national origin groups. Therefore, HUD advises that an analysis of people with LEP be included in the AI.

2. Definitions of Fair Housing Protected Classes

Definitions and examples of the protected classes are provided below:

**Race**: refers to family, tribe or group of people coming from the same common ancestors.

Example: Discrimination against African-Americans by a Caucasian apartment manager.

**Color**: refers to the color of an individual’s skin.


**Religion**: refers to all aspects of religious belief, observance, and practice.

Example: Discriminating against non-Catholics (Muslim, Buddhist, etc.) because of their religion.

**Sex**: includes gender (male or female), gender identity, and gender expression. Also includes, but is not limited to, pregnancy, childbirth, or conditions related to pregnancy or childbirth.

Example: A property manager refusing to rent an apartment to a female householder.

**National Origin**: refers to the country in which a person was born, or from which the person’s ancestors came.

Example: Discrimination against a Puerto Rican individual by a Mexican property owner.
Familial Status: Refers to a situation where there are one or more persons under age 18 who reside with a parent, legal guardian, etc. This also applies in the case of pregnancy or for people who are in the process of gaining legal custody of a person under age 18.

– Example: Forcing families with children to live on the first floor, or not renting to individuals with young children.

Handicap/Disability: refers to physical, mental and developmental disabilities.

Example: Not allowing a disabled individual to have a service animal in a renter’s apartment.

Attachment A provides additional definitions of the fair housing protected classes/groups.

In addition to the seven classes protected under federal law, California law enumerates seven additional groups: age, marital status, ancestry, source of income, sexual orientation, genetic information, and other arbitrary factors. Because the AI is a federal document, the analysis focuses on the protected classes listed in the federal Fair Housing Act.

Section V contains the following data:

- The numbers of people who are member of each protected class.
- The percentage of fair housing inquiries, allegations and discrimination complaints made by residents who are members each protected class.
- The socio-economic characteristics of each protected class such as the number and percentage of households with incomes below the poverty level and owner/renter status.
- Statistics that establish benchmarks to track trends such as whether the protected classes have increased their ownership rates or reduced poverty levels.

Data are unavailable on the religious affiliation of Bellflower’s population.

B. RACE/COLOR

1. Population Characteristics by Race and Ethnicity

a. Race and Ethnic Categories

The Fair Housing Act does not define race. The racial categories included on the 2010 Census form generally reflect a social definition of race recognized in this country, and are not an attempt to define race biologically, anthropologically or genetically. In addition, the U.S. Census Bureau recognizes that the race categories include both racial and national origin or socio-cultural groups. Census 2010 and the American Community Survey provide for six race categories:

- White Alone
- Black, African American or Negro Alone
- American Indian or Alaska Native Alone
- Asian Alone
- Native Hawaiian or Other Pacific Islander Alone
- Some Other Race Alone
SECTION V

FAIR HOUSING PROTECTED GROUPS

Individuals who chose more than one of the six race categories are referred to as the *two or more races* population. All respondents who indicated more than one race can be collapsed into the *two or more races* category, which combined with the six *alone* categories, yields seven mutually exclusive categories. Thus, the six race *alone* categories and the *two or more races* category sum to the total population.

The race and ethnic categories follow the Office of Management and Budget (OMB) Policy Directive No. 15 (May 12, 1977) and the 1997 revisions. The OMB’s efforts are to standardize the racial and ethnic categories so that federal government agencies can monitor discrimination, as required by the Civil Rights Act of 1964, the Voting Rights Act of 1965, the Fair Housing Act of 1968, the Equal Credit Opportunity Act of 1974, and the Home Mortgage Disclosure Act of 1975.


Ethnicity means being of Hispanic or Latino Origin or not being of such origin.

Attachment B defines the race categories.

b. **Definitions of Minority Populations**

The populations comprising “minority” groups are defined in the same way by the OMB, Federal Department of Transportation (DOT), Federal Financial Institutions Examination Council (FFIEC), and Council on Environmental Quality (CEQ - environmental justice guidelines). The OMB and DOT both define the minority populations as Black, Hispanic (regardless of race), Asians (including Pacific Islanders) and American Indian and Alaskan Native. The FFIEC, for purposes of Home Mortgage Disclosure Act (HMDA) data collection, states that:

...the percentage minority population means, for a particular census tract, the percentage of persons of minority races and whites of Hispanic or Latino Origin, in relation to the census tract’s total population.

The CEQ environmental justice guidelines provide the following definition:

Minority individuals – Individuals who are members of the following population groups: Hispanic or Latino, American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, multiracial minority (two or more races, at least one of which is a minority race).

The non-minority population is White, Non-Hispanic or Latino.

c. **Bellflower’s Population by Race and Ethnicity**

According to the FHF, race was the basis for approximately 14% of the housing inquiries/allegations filed by Bellflower residents between FY 2015/2016 and FY 2018/FY2019.

According to HUD, race/color was the basis for 25% of the housing discrimination complaints filed by Bellflower residents between 2010 and 2019.
Table V-1 shows the population growth by race and ethnicity between 2010 and 2017. During this period, all populations experienced gains except for the Hispanic and American Indian/Alaskan Native populations. The White Alone population comprised 71% of the population growth between 2010 and 2017 (826/1,156).

Table V-1
City of Bellflower
Population Growth by Race and Ethnicity: 2010 to 2017

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>2010</th>
<th>2017</th>
<th>Increase/Decrease</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hispanic or Latino</td>
<td>40,085</td>
<td>39,539</td>
<td>-546</td>
</tr>
<tr>
<td>Not Hispanic or Latino</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White Alone</td>
<td>14,971</td>
<td>15,797</td>
<td>826</td>
</tr>
<tr>
<td>Black or African American Alone</td>
<td>10,374</td>
<td>10,607</td>
<td>233</td>
</tr>
<tr>
<td>American Indian and Alaska Native Alone</td>
<td>229</td>
<td>113</td>
<td>-166</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>8,720</td>
<td>8,857</td>
<td>137</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander Alone</td>
<td>567</td>
<td>826</td>
<td>259</td>
</tr>
<tr>
<td>Some Other Race Alone</td>
<td>162</td>
<td>297</td>
<td>135</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>1,508</td>
<td>1,736</td>
<td>228</td>
</tr>
<tr>
<td>Total</td>
<td>76,616</td>
<td>77,772</td>
<td>1,156</td>
</tr>
</tbody>
</table>

Source: Census 2010 Summary File 1, Table P9 Hispanic or Latino, and Not Hispanic or Latino Origin by Race. 2017 American Community Survey 1-Year Estimates, Table B03002

d. Race of Hispanic or Latino and Not Hispanic or Latino Populations

Table V-2 shows that in 2017, 39,539 persons identified themselves as being of Hispanic or Latino Origin. With respect to race –

- About 25% of the Hispanic population said that their race was White Alone
- Almost 70% said they belonged to Some Other Race
- Just over 3% identified themselves as having Two or More Races

Thus, many Bellflower residents departed from the U.S. Census Bureau racial categories and selected “some other race.”
Table V-2
City of Bellflower
Race of Hispanic or Latino and Not Hispanic or Latino Populations: 2013-2017

<table>
<thead>
<tr>
<th>Race</th>
<th>Hispanic or Latino</th>
<th>Percent Distribution</th>
<th>Not Hispanic or Latino</th>
<th>Percent Distribution</th>
<th>Total</th>
<th>Percent Distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>White Alone</td>
<td>9,986</td>
<td>25.3%</td>
<td>15,797</td>
<td>41.3%</td>
<td>25,783</td>
<td>33.2%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>417</td>
<td>1.1%</td>
<td>10,607</td>
<td>27.7%</td>
<td>11,024</td>
<td>14.2%</td>
</tr>
<tr>
<td>Asian Alone</td>
<td>147</td>
<td>0.3%</td>
<td>8,857</td>
<td>23.2%</td>
<td>9,004</td>
<td>11.6%</td>
</tr>
<tr>
<td>American Indian or Alaska</td>
<td>211</td>
<td>0.5%</td>
<td>113</td>
<td>0.3%</td>
<td>324</td>
<td>0.4%</td>
</tr>
<tr>
<td>Hawaiian or Other Pacific</td>
<td>0</td>
<td>0.0%</td>
<td>826</td>
<td>2.2%</td>
<td>826</td>
<td>1.1%</td>
</tr>
<tr>
<td>Islander or Other Native</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alone</td>
<td>27,530</td>
<td>69.6%</td>
<td>297</td>
<td>0.8%</td>
<td>27,827</td>
<td>35.7%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>1,248</td>
<td>3.2%</td>
<td>1,736</td>
<td>4.5%</td>
<td>2,984</td>
<td>3.8%</td>
</tr>
<tr>
<td>Total</td>
<td>39,539</td>
<td>50.8%</td>
<td>38,233</td>
<td>49.2%</td>
<td>77,772</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2013-2017 American Community Survey 5-Year Estimates, Table B03002: Hispanic or Latino Origin by Race

2. Poverty and Tenure Characteristics by Race and Ethnicity

a. Poverty Income by Race and Ethnicity

Table V-3 shows that poverty rates differ by race and ethnicity. The Asian and Hispanic populations have lowest poverty rates (5.6% and 9.9%). The White Alone, Not Hispanic population has the highest poverty rate (17.7%).

The poverty status data are based on the American Community Survey. According to this data source, all groups –except for the White, Not Hispanic group - have poverty rates lower than the statewide rates. For example, the state’s Black/African population has a poverty rate of 20.9% compared to the City’s 13.7%. In contrast, the state’s White, Not Hispanic population has a poverty rate of 9.0% compared to the City’s 17.7%.

The statewide poverty rates differ from those presented on page IV-14. Those poverty rates are based on the California Poverty Measure, not the American Community Survey.

Although poverty rates differ, any household with such low incomes – regardless of race or ethnicity – would be unable to afford market rate housing. Householders with poverty level incomes cannot attain housing within their means or of their choice.
### Table V-3
City of Bellflower
Poverty Status by Race and Ethnicity: 2017

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Population</th>
<th>Number Below Poverty Level</th>
<th>Percent Below Poverty Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>One Race</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White</td>
<td>25,525</td>
<td>2,973</td>
<td>11.6%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>10,868</td>
<td>1,488</td>
<td>13.7%</td>
</tr>
<tr>
<td>American Indian and Alaskan Native</td>
<td>N</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>Asian</td>
<td>9,004</td>
<td>504</td>
<td>5.6%</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>N</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>27,782</td>
<td>3,532</td>
<td>12.7%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>N</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>Hispanic or Latino of any race</td>
<td>39,494</td>
<td>3,923</td>
<td>9.9%</td>
</tr>
<tr>
<td>White Alone, Not Hispanic</td>
<td>15,539</td>
<td>2,750</td>
<td>17.7%</td>
</tr>
</tbody>
</table>

Source: 2017 American Community Survey 1-Year Estimates, Table S1701 Poverty Status in the Past 12 Months

b. **Tenure by Race and Ethnicity**

Existing and would be homeowners may experience housing discrimination during the process of buying a home. For instance, discriminatory behavior could be made by real estate agents, appraisers, lenders, and home insurance agents. Renters, on the other hand, could be denied access to housing while in-place tenants could be discriminated against by landlords. Most housing discrimination complaints are made by in-place renters.

Approximately 40% of the Bellflower’s households own a home. In fact, only the Asian householders have a homeownership rate of 50% or more. Refer to Table V-4.

There is a high correlation between the number and percentage of renter households and the need for fair housing services. The overwhelming majority of the alleged housing discriminatory acts reported to HUD and the Fair Housing Foundation are filed by renter householders.
Table V-4
City of Bellflower
Homeownership Rates by Race and Ethnicity: 2018

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Owners</th>
<th>Renters</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>48.5%</td>
<td>51.5%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>23.9%</td>
<td>76.1%</td>
</tr>
<tr>
<td>American Indian/Alaska Native</td>
<td>NA%</td>
<td>NA%</td>
</tr>
<tr>
<td>Asian</td>
<td>50.8%</td>
<td>49.2%</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>NA%</td>
<td>NA%</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>38.0%</td>
<td>62%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>28.2%</td>
<td>71.8%</td>
</tr>
<tr>
<td>Hispanic or Latino of any race</td>
<td>40.2%</td>
<td>59.8%</td>
</tr>
<tr>
<td>White Alone, Not Hispanic</td>
<td>48.3%</td>
<td>51.7%</td>
</tr>
<tr>
<td>Total</td>
<td>40.3%</td>
<td>59.7%</td>
</tr>
</tbody>
</table>

Sources: 2018 American Community Survey 1-Year Estimates, Table B25003A-I Tenure by Race/Ethnicity

C. SEX (OF HOUSEHOLDER)

1. Population Characteristics

In the sale and rental of housing, fair housing laws protect several “classes” from discrimination. Federal and State fair housing laws prohibit discrimination based on a person’s sex. The United States Department of Justice (DOJ) has stated:

The Fair Housing Act makes it unlawful to discriminate in housing on the basis of sex. In recent years, the Department’s focus in this area has been to challenge sexual harassment in housing. Women, particularly those who are poor, and with limited housing options, often have little recourse but to tolerate the humiliation and degradation of sexual harassment or risk having their families and themselves removed from their homes.

In addition, pricing discrimination in mortgage lending may also adversely affect women, particularly minority women. This type of discrimination is unlawful under both the Fair Housing Act and the Equal Credit Opportunity Act. [Emphasis added]

Source: United States Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, The Fair Housing Act, July 25, 2008, pages 2 and 3

According to the FHF, gender was the basis of 3.2% of housing discrimination complaints filed by Bellflower residents between FY 2015/2016 and FY 2018/2019. HUD data indicate that sex was the basis for approximately 4.1% of the housing discrimination complaints filed between 2010 and 2019.

Table V-5 presents data on the number of householders by type. Female and male householders account for almost one-fourth (23.6%) of all householders. Householders living alone account for one-fifth of all householders (20.8%).
Table V-5
City of Bellflower
Number of Households by Type: 2013-2017

<table>
<thead>
<tr>
<th>Household Type</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Married Couples</td>
<td>11,421</td>
<td>46.9%</td>
</tr>
<tr>
<td>Female Householders</td>
<td>3,923</td>
<td>16.1%</td>
</tr>
<tr>
<td>Male Householders</td>
<td>1,826</td>
<td>7.5%</td>
</tr>
<tr>
<td>Householder Living Alone</td>
<td>5,056</td>
<td>20.8%</td>
</tr>
<tr>
<td>Householder Living w/Others</td>
<td>2,107</td>
<td>8.7%</td>
</tr>
<tr>
<td>Total</td>
<td>24,333</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2013-2017 American Community Survey 5-Year Estimates, Table S2501 Occupancy Characteristics or B25011

2. Tenure by Household Type and Sex of Householder

Table V-6 provides information on the owner-renter status of different types of households. Married couple families are the largest household type and the only group that is predominantly homeowners. The second largest household type is persons living alone, which has a homeownership rate of just over 40%. Approximately 24% and 76% of the female householders (3,923) are owner and renters, respectively.

Table V-6
City of Bellflower
Tenure by Household Type: 2018

<table>
<thead>
<tr>
<th>Household Type</th>
<th>Owner</th>
<th>Percent</th>
<th>Renter</th>
<th>Percent</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Married-Couple Family</td>
<td>5,724</td>
<td>50.1%</td>
<td>5,697</td>
<td>49.9%</td>
<td>11,421</td>
</tr>
<tr>
<td>Male Householder, No Wife Present</td>
<td>418</td>
<td>22.9%</td>
<td>1,408</td>
<td>77.1%</td>
<td>1,826</td>
</tr>
<tr>
<td>Female Householder, No Husband Present</td>
<td>958</td>
<td>24.4%</td>
<td>2,965</td>
<td>75.6%</td>
<td>3,923</td>
</tr>
<tr>
<td>Householder Living Alone</td>
<td>2,036</td>
<td>40.3%</td>
<td>3,020</td>
<td>59.7%</td>
<td>5,056</td>
</tr>
<tr>
<td>Householder Living With Others</td>
<td>632</td>
<td>30.0%</td>
<td>1,475</td>
<td>70.0%</td>
<td>2,107</td>
</tr>
<tr>
<td>Total</td>
<td>9,768</td>
<td>40.1%</td>
<td>14,565</td>
<td>59.1%</td>
<td>24,333</td>
</tr>
</tbody>
</table>

Source: 2018 American Community Survey 1-Year Estimates, Table B25011: Tenure by Household Type (Including Living Alone) and Age of Householder

3. Socio/economic Characteristics of Female Householders

Poor women, as noted above by the DOJ, are often the victims of sexual harassment. Almost 23% of female householders have incomes below the poverty level (855/3,923).

Almost 1,200 female householders have recently received food stamps. And 78% of the female householders who received food stamp benefits have children. Refer to Table V-7 on the next page.
Table V-7
City of Bellflower
Female Householders by Presence of Children and SNAP Benefits: 2013-2017

<table>
<thead>
<tr>
<th>Status</th>
<th>Children</th>
<th>No Children</th>
<th>Total</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Received Food Stamps</td>
<td>934</td>
<td>257</td>
<td>1,191</td>
<td>30.4%</td>
</tr>
<tr>
<td>Did Not Receive Food Stamps</td>
<td>938</td>
<td>1,794</td>
<td>2,732</td>
<td>69.6%</td>
</tr>
<tr>
<td>Total</td>
<td>1,872</td>
<td>2,051</td>
<td>3,923</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2013-2017 American Community Survey 5-Year Estimates, Table B22002, Receipt of Food Stamps/SNAP in the Past 12 Months by Presence of Children under 18 Years by Household Type for Households

D. NATIONAL ORIGIN/ANCESTRY

The Fair Housing Act and California Fair Employment and Housing Act prohibit discrimination based upon national origin. According to the United States Department of Justice, such discrimination can be based either upon the country of an individual's birth or where his or her ancestors originated.

National origin was the basis of 3.2% of the fair housing inquiries/allegations filed with the FHF by Bellflower residents between FY 2015/2016 and FY 2018/2019. Eight percent of the complaints filed with HUD between 2010 and 2019 had national origin as their basis.

According to HUD:

National origin discrimination is different treatment in housing because of a person’s ancestry, ethnicity, birthplace, culture, or language, and it is illegal. This means people cannot be denied housing opportunities because they or their family are from another country, because they have a name or accent associated with a national origin group, because they participate in certain customs associated with a national origin group, or because they are married to or associate with people of a certain national origin. Examples of potential national origin discrimination include: refusing to rent to persons whose primary language is other than English; offering different rent rates based on ethnicity; steering prospective buyers or renters to or away from certain neighborhoods because of their ancestry; and failing to provide the same level of service or housing amenities because a tenant was born in another country.

1. Ancestry

Ancestry, according to the ACS, refers to a person’s ethnic origin, heritage, descent, or “roots,” which may reflect their place of birth or that of previous generations of their family. The intent of the ACS ancestry question is not to measure the degree of attachment the respondent had to a particular ethnicity, but simply to establish that the respondent had a connection to and self-identified with a particular ethnic group. For example, a response of “Irish” might reflect total involvement in an Irish community or only a memory of ancestors several generations removed from the individual.

According to the ACS ancestry identifies the ethnic origins of the population, and that federal agencies regard this information as essential for fulfilling many important needs. Ancestry is
required to enforce provisions under the Civil Rights Act, which prohibits discrimination based upon race, sex, religion, and national origin. More generally, these data are needed to measure the social and economic characteristics of ethnic groups and to tailor services to accommodate cultural differences. The Department of Labor draws samples for surveys that provide employment statistics and other related information for ethnic groups using ancestry data.

Data from the 2013-2017 American Community Survey found that 67,440 of 77,852 people reported “other groups” or were “unclassified or not reported” on the ancestry question. Of the 10,412 persons who responded to the question, the top four ancestries of Bellflower residents were German, Irish, English and American.

2. Foreign Born Population by Region of Birth

The foreign-born population includes anyone who is not a U.S. citizen or a U.S. national at birth, including respondents who indicated they were a U.S. citizen by naturalization or not a U.S. citizen. Table V-8 indicates that Bellflower’s foreign born population consists of approximately 24,400 persons. Of this total number -

- Almost 63% were born in Latin America
- Just over 31% were born in Asia

<table>
<thead>
<tr>
<th>Region</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Europe</td>
<td>415</td>
<td>1.7%</td>
</tr>
<tr>
<td>Asia</td>
<td>7,627</td>
<td>31.2%</td>
</tr>
<tr>
<td>Africa</td>
<td>904</td>
<td>3.7%</td>
</tr>
<tr>
<td>Oceania</td>
<td>24</td>
<td>0.1%</td>
</tr>
<tr>
<td>Latin America</td>
<td>15,352</td>
<td>62.8%</td>
</tr>
<tr>
<td>North America</td>
<td>122</td>
<td>0.5%</td>
</tr>
<tr>
<td>Total</td>
<td>24,444</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2013-2017 American Community Survey 5-Year Estimates, Table S0502, Selected Characteristics of the Foreign Born Population by Period of Entry into the United States
3. Ethnicity or Origins of the Population

a. Origins of the Hispanic or Latino Population

Almost 43,000 Hispanic or Latino persons reside in Bellflower. Table V-9 shows that Mexico is the origin of approximately eight of every 10 Hispanic persons. Between 2010 and 2017, there was a percentage increase in Hispanics identifying Mexico as their place of origin.

<table>
<thead>
<tr>
<th>Hispanic Origin</th>
<th>2010</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>Mexican</td>
<td>32,587</td>
<td>81.3%</td>
</tr>
<tr>
<td>Puerto Rican</td>
<td>445</td>
<td>1.1%</td>
</tr>
<tr>
<td>Cuban</td>
<td>295</td>
<td>0.7%</td>
</tr>
<tr>
<td>Other Spanish/Hispanic*</td>
<td>6,758</td>
<td>16.9%</td>
</tr>
<tr>
<td>Total</td>
<td>40,085</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2010 Census Summary File 1, QT-P3 Race and Hispanic or Latino Origin 2013-2017 American Community Survey 5-Year Estimates, Table DP05: ACS Demographic and Housing Estimates

b. Origins of the Asian Population

Table V-10 shows that the origins of three-fourths of the Asian population was South Eastern Asia, a region that includes the countries of Cambodia, Indonesia, Laos, Myanmar, Philippines, Thailand and Vietnam. Almost 18% of the Asian population has their origins in Eastern Asia, a region that includes the countries of China, Japan, Korea and Taiwan.

<table>
<thead>
<tr>
<th>Origin</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eastern Asia</td>
<td>1,351</td>
<td>17.8%</td>
</tr>
<tr>
<td>South Central Asia</td>
<td>496</td>
<td>6.5%</td>
</tr>
<tr>
<td>South Eastern Asia</td>
<td>5,568</td>
<td>73.3%</td>
</tr>
<tr>
<td>Western Asia</td>
<td>183</td>
<td>2.4%</td>
</tr>
<tr>
<td>Total</td>
<td>7,598</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2013-2017 American Community Survey 5-Year Estimates, Table S0505, Selected Characteristics of the Foreign Born Population by Region of Birth
c. **Other Population Groups**

Because of their low population totals, the American Community Survey did not publish detailed origin data for the Native Hawaiian/Pacific Islander and American Indian/Alaska Native populations.

**E. FAMILIAL STATUS**

1. **Population Characteristics**

The Fair Housing Amendments Act of 1988 prohibits discriminatory housing practices based on familial status. In most instances, according to the United States Department of Justice, the Act prohibits a housing provider from refusing to rent or sell to families with children. However, housing may be designated as housing for older persons (55 years + of age). This type of housing, which meets the standards set forth in the Housing for Older Persons Act of 1995, may operate as “senior housing” and exclude families with children.

The Act protects families with children less than 18 years of age, pregnant women, or families in the process of securing custody of a child under 18 years of age. The Department of Justice has stated:

> In addition to prohibiting the outright denial of housing to families with children, the Act also prevents housing providers from imposing any special requirements or conditions on tenants with children. For example, landlords may not locate families with children in any single portion of a complex, place an unreasonable restriction on the number of persons who may reside in a dwelling, or limit their access to recreational services provided to other tenants.

Source: United States Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, *The Fair Housing Act*, July 25, 2008, page 3

According to the FHF, familial status was the basis of almost 16% of the fair housing inquiries/allegations filed by Bellflower residents between FY 2015/2016 and FY 2018/2019. HUD data indicate that familial status was the basis for almost 17% of the housing discrimination complaints filed by Bellflower residents between 2010 and 2019.

The 2018 ACS data shows that the City had 24,333 households: 17,170 family households and 7,163 nonfamily households. A nonfamily household is a householder living alone or with nonrelatives only. Unmarried couple households, whether opposite-sex or same-sex, with no relatives of the householder present are tabulated in nonfamily households.

Forty-five percent of family households have children (7,739/17,170). Table V-11 shows that 63% of children live in married couple families (5,208/7,739). Female and male householders also have children and are members of the familial status protected class.
### Table V-11

**City of Bellflower**

**Households with Children: 2018**

<table>
<thead>
<tr>
<th>Household Type</th>
<th>Number</th>
<th>With Children</th>
<th>Percent With Children</th>
</tr>
</thead>
<tbody>
<tr>
<td>Married Couples</td>
<td>11,421</td>
<td>5,208</td>
<td>45.6%</td>
</tr>
<tr>
<td>Female Householders, No Husband Present</td>
<td>3,923</td>
<td>1,765</td>
<td>45.0%</td>
</tr>
<tr>
<td>Male Householders, No Wife Present</td>
<td>1,826</td>
<td>766</td>
<td>42.0%</td>
</tr>
<tr>
<td>Non-Family Householders</td>
<td>7,163</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>24,333</td>
<td>7,739</td>
<td>31.8%</td>
</tr>
</tbody>
</table>

Source: 2013-2017 American Community Survey 5-Year Estimates, Table B17023, Poverty Status in the Past 12 Months of Families by Household Type by Number of Own Children Under 18 Years
2018 American Community Survey 1-Year Estimates, Table B25115: Tenure by Household Type and Presences and Age of Own Children

### 2. Poverty and Tenure by Familial Status

#### a. Poverty Income by Familial Status and Presence of Children

Poverty by family type offers another indicator of the well-being of families. Married couple families with and without children have comparatively low poverty rates. Female householders with children experience the highest poverty rate of 28.5%, which is slightly higher than that of male householders with children (24.5%). Refer to Table V-12.

#### b. Tenure by Familial Status

The need for fair housing services is directly correlated to size of the fair housing protected groups against whom housing discrimination is practiced. In-place renters are the group that makes the majority of housing discrimination complaints. Table V-13 indicates that almost 14,600 renter households reside in Bellflower.

Familial status was the basis for approximately 16% of all fair housing inquiries/allegations filed by Bellflower residents with the Fair Housing Foundation between FY 2015/2016 and FY 2018/2019. Table V-13 shows the number of families with and without children by tenure. Renter householders with children comprise 21% of Bellflower’s householders (5,004/24,333).

These data demonstrate a need for the City to continue to support the provision of fair housing services to its residents.
Table V-12
City of Bellflower
Poverty Status by Familial Status and Presence of Children-2017

<table>
<thead>
<tr>
<th>Family Type</th>
<th>Percent Below Poverty Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Married Couple Families</td>
<td>7.3%</td>
</tr>
<tr>
<td>With related children under 18 years</td>
<td>11.4%</td>
</tr>
<tr>
<td>With no related children under 18 years</td>
<td>3.1%</td>
</tr>
<tr>
<td>Male Householder, No Wife Present</td>
<td>14.7%</td>
</tr>
<tr>
<td>With related children under 18 years</td>
<td>24.5%</td>
</tr>
<tr>
<td>With no related children under 18 years</td>
<td>6.4%</td>
</tr>
<tr>
<td>Female Householder, No Husband Present</td>
<td>19.3%</td>
</tr>
<tr>
<td>With related children under 18 years</td>
<td>28.5%</td>
</tr>
<tr>
<td>With no related children under 18 years</td>
<td>9.4%</td>
</tr>
</tbody>
</table>

Source: 2013-2017 American Community Survey 5-Year Estimates, Table B17023, Poverty Status in the Past 12 Months of Families by Household Type by Number of Own Children Under 18 Years

Table V-13
City of Bellflower
Tenure by Presence of Children: 2018

<table>
<thead>
<tr>
<th>Presence of Children</th>
<th>Owner</th>
<th>Percent</th>
<th>Renter</th>
<th>Percent</th>
<th>Total</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>With Own Children Under 18 Years</td>
<td>2,735</td>
<td>35.3%</td>
<td>5,004</td>
<td>64.7%</td>
<td>7,739</td>
<td>31.8%</td>
</tr>
<tr>
<td>No Own Children Under 18 Years</td>
<td>4,365</td>
<td>46.3%</td>
<td>5,066</td>
<td>53.7%</td>
<td>9,431</td>
<td>38.8%</td>
</tr>
<tr>
<td>Nonfamily Households</td>
<td>2,668</td>
<td>37.2%</td>
<td>4,495</td>
<td>62.8%</td>
<td>7,163</td>
<td>29.4%</td>
</tr>
<tr>
<td>Total</td>
<td>9,768</td>
<td>40.1%</td>
<td>14,565</td>
<td>59.9%</td>
<td>24,333</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2018 American Community Survey 1-Year Estimates, Table B25115: Tenure by Household Type and Presences and Age of Own Children.

F. HANDICAP/DISABILITY

1. Background

The Fair Housing Amendments Act of 1988 prohibits discriminatory housing practices based on handicap/disability status in all types of housing transactions. Among other prohibitions, the Act is intended to prohibit the application of special restrictive covenants and conditional or special use permits that have the effect of limiting the ability of such individuals to live in the residence of their choice. Fair housing laws, therefore, make it illegal to deny a housing opportunity on the basis of disabilities.

In addition, the law prohibits applying one standard to one class of individuals while applying a different standard to another class of individuals. For example, it would be illegal to ask a
disabled individual applying for an apartment to provide a credit report if non-disabled applicants do not have to provide one.

Housing opportunities for disabled persons are impeded by practices in both the private and public sectors. For instance, “denied reasonable modification/accommodation” is often cited as an alleged act in housing discrimination complaints. Additionally, apartment rental ads often state “no pets allowed,” even though disabled persons may have service or companion animals. In the public sector, housing opportunities can be impeded because a community has not adopted a reasonable accommodation procedure, or if adopted has not made the procedure widely known in the community.

The United States Department of Justice has indicated a major focus of its efforts is on public sector impediments that may restrict housing opportunities for disabled persons. The Department has stated:

The Division’s enforcement of the Fair Housing Act’s protections for persons with disabilities has concentrated on two major areas. One is insuring that zoning and other regulations concerning land use are not employed to hinder the residential choices of these individuals, including unnecessarily restricting communal, or congregate, residential arrangements, such as group homes. The second area is insuring that newly constructed multifamily housing is built in accordance with the Fair Housing Act’s accessibility requirements so that it is accessible to and usable by people with disabilities, and, in particular, those who use wheelchairs.

Source: United States Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, The Fair Housing Act, July 25, 2008, page 4

According to the FHF, disability was the basis for 57% of all fair housing inquiries/allegations filed by Bellflower residents between FY 2015/2016 and FY 2018/2019. HUD data indicate that disability was the basis for 29% of the discrimination complaints filed between 2010 and 2019.

2. Estimates of People with Disabilities

Of the civilian noninstitutionalized population, which numbers 76,757, an estimated 7.2% or 5,500 people have a disability. More than one-third of the senior population 75 years old or older have a disability. Table V-14 presents the disability prevalence rates by age group.

Table V-15 shows that one in four households have a member with a disability, a proportion much higher than for the non-institutionalized population. The reason for the difference in rates may be that many elderly and frail elderly persons live alone in one person households. That is, these households comprise a large share of all households, but not of the total population.
### Table V-14

**City of Bellflower**  
**Disability Status of Civilian Non-institutionalized Population by Age Group: 2018**

<table>
<thead>
<tr>
<th>Age Group</th>
<th>Disabled Population</th>
<th>Total Population</th>
<th>Percent Disabled</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 5 years</td>
<td>0</td>
<td>5,813</td>
<td>0.0%</td>
</tr>
<tr>
<td>5-17 years</td>
<td>195</td>
<td>12,949</td>
<td>1.5%</td>
</tr>
<tr>
<td>18-34 years</td>
<td>890</td>
<td>20,825</td>
<td>4.3%</td>
</tr>
<tr>
<td>35-64 years</td>
<td>2,377</td>
<td>29,582</td>
<td>8.0%</td>
</tr>
<tr>
<td>65-74 years</td>
<td>1,024</td>
<td>4,761</td>
<td>21.5%</td>
</tr>
<tr>
<td>75 years+</td>
<td>1,014</td>
<td>2,867</td>
<td>35.4%</td>
</tr>
<tr>
<td>Total</td>
<td>5,500</td>
<td>76,757</td>
<td>7.2%</td>
</tr>
</tbody>
</table>

Source: 2018 American Community Survey 1-Year Estimates, Table B18101, Sex by Age by Disability Status

### Table V-15

**City of Bellflower**  
**Disabled Householders: 2018**

<table>
<thead>
<tr>
<th>Household Disability Status</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Households with one or more persons with a disability</td>
<td>4,462</td>
<td>18.3%</td>
</tr>
<tr>
<td>Households with no persons with a disability</td>
<td>19,871</td>
<td>81.7%</td>
</tr>
<tr>
<td>Total</td>
<td>24,333</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2018 American Community Survey 1-Year Estimates, Table S22010, Receipt of Food Stamps/SNAP in the Past 12 Months by Disability Status for Households

### 3. Developmentally Disabled

SB 812, which took effect January 2011, amended State Housing Element Law to require the analysis of the disabled to include an evaluation of the special housing needs of persons with developmental disabilities. A "developmental disability" is defined as a disability that originates before an individual becomes 18 years old, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. This includes intellectual disability, cerebral palsy, epilepsy, and autism.

The U.S. Census does not have specific information regarding persons with developmental disabilities. However, each nonprofit regional center contracted with the California Department of Developmental Services maintains an accounting of the number of persons served. The South Central Los Angeles Regional Center serves persons in the City of Bellflower, as well as nearby other cities. According to information in the City’s Housing Element, the Regional Center serves six developmentally disabled persons who live in Bellflower.

The Housing Element’s Program 24 – Housing for Persons with Developmental Disabilities – has the objective of continuing to offer specific regulatory incentives; apply for funding to
encourage development of units specifically for persons with developmental disabilities, when funding is available; outreach to potential developers; and initiate a cooperative outreach program with the South Central Los Angeles Regional Center.

G. LIMITED ENGLISH PROFICIENCY (LEP)

LEP refers to a person’s limited ability to read, write, speak, or understand English. Individuals who are LEP are not a protected class under the federal Fair Housing Act. Nonetheless, the Act prohibits housing providers from using LEP selectively based on a protected class or as a pretext for discrimination because of a protected class. The Act also prohibits housing providers from using LEP in a way that causes an unjustified discriminatory effect.

The American Community Survey defines a “limited English speaking household” as one in which no member 14 years old and over (1) speaks only English at home or (2) speaks a language other than English at home and speaks English “Very well.” This question identifies households that may need English-language assistance.

There are approximately 2,250 limited English speaking households residing in Bellflower. Almost 62% are Spanish speaking and almost 16% speak Asian and Pacific Island languages. Limited English speaking households comprise 9.2% of all households living in the City. Refer to Table V-16.

Table V-16
City of Bellflower
Limited English Speaking Households: 2017

<table>
<thead>
<tr>
<th>Households Speaking</th>
<th>Limited English-Speaking Households</th>
<th>Percent of all Limited English-Speaking Households¹</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>1,386</td>
<td>61.7%</td>
</tr>
<tr>
<td>Other Indo-European Languages</td>
<td>42</td>
<td>1.9%</td>
</tr>
<tr>
<td>Asian and Pacific Island Languages</td>
<td>358</td>
<td>15.9%</td>
</tr>
<tr>
<td>Other Languages</td>
<td>461</td>
<td>20.5%</td>
</tr>
<tr>
<td>Total</td>
<td>2,247</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: 2017 American Community Survey 1-Year Estimates, Table S1602, Limited English Speaking Households
ATTACHMENT A
FAIR HOUSING PROTECTED CLASSES

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability). These categories of persons are “protected classes” under the provisions of the Fair Housing Act.

**Race:** The Fair Housing Act does not define race. Data on race is required for many federal programs and the Census Bureau collects race data in accordance with guidelines provided by the U.S. Office of Management and Budget (OMB) and these data are based on self-identification. The racial categories included in the census form generally reflect a *social definition* of race recognized in this country, and are not an attempt to define race biologically, anthropologically or genetically. In addition, the Census Bureau recognizes that the categories of the race item include both racial and national origin or socio-cultural groups. Census 2010 and the American Community Survey provide for six race categories: White; Black, African American or Negro; American Indian or Alaska Native; Asian; Native Hawaiian or Other Pacific Islander; and Some Other Race.

**Sex:** This basis refers to gender identity. California’s Fair Employment and Housing Act defines “sex” as including, but not limited to, pregnancy, childbirth, medical conditions related to pregnancy or childbirth and a person's gender, as defined in Section 422.56 of the Penal Code. Government Code Section 12926(p)

**National Origin:** This basis refers to the real or perceived country of an individual’s birth, ancestry, language and/or customs.

**Color:** The Fair Housing Act does not define color. However, it must refer to the complexion of a person’s skin color or pigmentation. The 2010 racial categories can be traced to Statistical Policy Directive No.15, promulgated by the OMB on May 12, 1977. “The four racial categories stipulated in the (1977) directive parallel the classic nineteenth-century color designations of black, white, red (American Indian or Alaska native), and yellow (Asian or Pacific Islander); there is no brown race in the American ethno racial taxonomy.” [Victoria Hattam, “Ethnicity & the Boundaries of Race: Re-reading Directive 15,” *Daedalus*, Winter 2005, page 63]

**Religion:** According to the United States Department of Justice, this prohibition covers instances of overt discrimination against members of a particular religion as well as less direct actions, such as zoning ordinances designed to limit the use of private homes as places of worship.
### Familial Status:

According to Section 802(k) of the Fair Housing Act, as amended, means one or more individuals (who have not attained the age of 18 years) being domiciled with--

1. a parent or another person having legal custody of such individual or individuals; or
2. the designee of such parent or other person having such custody, with the written permission of such parent or other person.

The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years.

### Handicap (Disability):

According to Section 802(h) of the Fair Housing Act, as amended, handicap/disability means -

1. a physical or mental impairment which substantially limits one or more of such person's major life activities,
2. a record of having such an impairment, or
3. being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)).
ATTACHMENT B
2010 CENSUS DEFINITIONS OF RACE

The data on race were derived from answers to the question on race that was asked of all people. The U.S. Census Bureau collects race data in accordance with guidelines provided by the U.S. Office of Management and Budget (OMB), and these data are based on self-identification. The racial categories included in the census questionnaire generally reflect a social definition of race recognized in this country and not an attempt to define race biologically, anthropologically, or genetically. In addition, it is recognized that the categories of the race item include racial and national origin or sociocultural groups. People may choose to report more than one race to indicate their racial mixture, such as “American Indian” and “White.” People who identify their origin as Hispanic, Latino, or Spanish may be of any race.

The racial classifications used by the Census Bureau adhere to the October 30, 1997, Federal Register notice entitled, “Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity” issued by OMB. These standards govern the categories used to collect and present federal data on race and ethnicity. OMB requires five minimum categories (White, Black or African American, American Indian or Alaska Native, Asian, and Native Hawaiian or Other Pacific Islander) for race. The race categories are described below with a sixth category, “Some Other Race,” added with OMB approval. In addition to the five race groups, OMB also states that respondents should be offered the option of selecting one or more races.

If an individual did not provide a race response, the race or races of the householder or other household members were allocated using specific rules of precedence of household relationship. For example, if race was missing for a natural-born child in the household, then either the race or races of the householder, another natural-born child, or spouse of the householder were allocated.

If race was not reported for anyone in the household, then their race was assigned based on their prior Census record (either from Census 2000 or the American Community Survey), if available. If not, then the race or races of a householder in a previously processed household were allocated.

Definitions from OMB guide the Census Bureau in classifying written responses to the race question:

**White.** A person having origins in any of the original peoples of Europe, the Middle East, or North Africa. It includes people who indicate their race as “White” or report entries such as Irish, German, Italian, Lebanese, Arab, Moroccan, or Caucasian.

**Black or African American.** A person having origins in any of the Black racial groups of Africa. It includes people who indicate their race as “Black, African Am., or Negro” or report entries such as African American, Kenyan, Nigerian, or Haitian.

**American Indian or Alaska Native.** A person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment. This category includes people who indicate their race as “American Indian or Alaska Native” or report entries such as Navajo, Blackfeet, Inupiat, Yup’ik, or Central American Indian groups or South American Indian groups.
Respondents who identified themselves as “American Indian or Alaska Native” were asked to report their enrolled or principal tribe. Therefore, tribal data in tabulations reflect the written entries reported on the questionnaires. Some of the entries (for example, Metlakatla Indian Community and Umatilla) represent reservations or a confederation of tribes on a reservation.

The information on tribe is based on self-identification and therefore does not reflect any designation of federally or state-recognized tribe. The information for the 2010 Census was derived from the American Indian and Alaska Native Tribal Classification List for Census 2000 and updated from 2002 to 2009 based on the annual Federal Register notice entitled “Indian Entities Recognized and Eligible to Receive Services From the United States Bureau of Indian Affairs,” Department of the Interior, Bureau of Indian Affairs, issued by OMB, and through consultation with American Indian and Alaska Native communities and leaders.

Asian. A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam. It includes people who indicate their race as “Asian Indian,” “Chinese,” “Filipino,” “Korean,” “Japanese,” “Vietnamese,” and “Other Asian” or provide other detailed Asian responses.

Native Hawaiian or Other Pacific Islander. A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands. It includes people who indicate their race as “Native Hawaiian,” “Guamanian or Chamorro,” “Samoan,” and “Other Pacific Islander” or provide other detailed Pacific Islander responses.

Some Other Race. Includes all other responses not included in the “White,” “Black or African American,” “American Indian or Alaska Native,” “Asian,” and “Native Hawaiian or Other Pacific Islander” race categories described above. Respondents reporting entries such as multiracial, mixed, interracial, or a Hispanic, Latino, or Spanish group (for example, Mexican, Puerto Rican, Cuban, or Spanish) in response to the race question are included in this category.

Two or More Races. People may choose to provide two or more races either by checking two or more race response check boxes, by providing multiple responses, or by some combination of check boxes and other responses. The race response categories shown on the questionnaire are collapsed into the five minimum race groups identified by OMB and the Census Bureau’s “Some Other Race” category. For data product purposes, “Two or More Races” refers to combinations of two or more of the following race categories:

1. White
2. Black or African American
3. American Indian or Alaska Native
4. Asian
5. Native Hawaiian or Other Pacific Islander
6. Some Other Race

There are 57 possible combinations involving the race categories shown above. Thus, according to this approach, a response of “White” and “Asian” was tallied as Two or More Races, while a response of “Japanese” and “Chinese” was not because “Japanese” and “Chinese” are both Asian responses.
ATTACHMENT C
2010 CENSUS DEFINITIONS OF HISPANIC OR LATINO ORIGIN

The data on the Hispanic or Latino population were derived from answers to a question that was asked of all people. The terms “Hispanic,” “Latino,” and “Spanish” are used interchangeably. Some respondents identify with all three terms, while others may identify with only one of these three specific terms. People who identify with the terms “Hispanic,” “Latino,” or “Spanish” are those who classify themselves in one of the specific Hispanic, Latino, or Spanish categories listed on the questionnaire (“Mexican,” “Puerto Rican,” or “Cuban”) as well as those who indicate that they are “another Hispanic, Latino, or Spanish origin.” People who do not identify with one of the specific origins listed on the questionnaire but indicate that they are “another Hispanic, Latino, or Spanish origin” are those whose origins are from Spain, the Spanish-speaking countries of Central or South America, or the Dominican Republic. Up to two write-in responses to the “another Hispanic, Latino, or Spanish origin” category are coded.

Origin can be viewed as the heritage, nationality group, lineage, or country of birth of the person or the person’s parents or ancestors before their arrival in the United States. People who identify their origin as Hispanic, Latino, or Spanish may be of any race.

Some tabulations are shown by the origin of the householder. In all cases where the origin of households, families, or occupied housing units is classified as Hispanic, Latino, or Spanish, the origin of the householder is used. If an individual did not provide a Hispanic origin response, their origin was allocated using specific rules of precedence of household relationship. For example, if origin was missing for a natural-born child in the household, then either the origin of the householder, another natural-born child, or spouse of the householder was allocated.

If Hispanic origin was not reported for anyone in the household and origin could not be obtained from a response to the race question, then their origin was assigned based on their prior census record (either from Census 2000 or the American Community Survey), if available. If not, then the Hispanic origin of a householder in a previously processed household with the same race was allocated. As in Census 2000, surnames (Spanish and non-Spanish) were used to assist in allocating an origin or race.

Comparability. There are four changes to the Hispanic origin question for the 2010 Census. First, the wording of the question differs from that in 2000. In 2000, the question asked if the person was “Spanish/Hispanic/Latino.” In 2010, the question asks if the person is “of Hispanic, Latino, or Spanish origin.” Second, in 2000, the question provided an instruction, “Mark □ the ‘No’ box if not Spanish/Hispanic/ Latino.” The 2010 Census question provided no specific instruction for non-Hispanics. Third, in 2010, the “Yes, another Hispanic, Latino, or Spanish origin” category provided examples of six Hispanic origin groups (Argentinean, Colombian, Dominican, Nicaraguan, Salvadoran, Spaniard, and so on) and instructed respondents to “print origin.” In 2000, no Hispanic origin examples were given. Finally, the fourth change was the addition of a new instruction in the 2010 Census that was not used in Census 2000. The instruction is stated as follows: “NOTE: Please answer BOTH Question 8 about Hispanic origin and Question 9 about race. For this census, Hispanic origins are not races.”

There were two changes to the Hispanic origin question for Census 2000. First, the sequence of the race and Hispanic origin questions for Census 2000 differed from that in 1990; in 1990, the race question preceded the Hispanic origin question. Testing prior to Census 2000 indicated that response to the Hispanic origin question could be improved by placing it before the race question without affecting the response to the race question. Second, there was an instruction
preceeding the Hispanic origin question indicating that respondents should answer both the Hispanic origin and the race questions. This instruction was added to give emphasis to the distinct concepts of the Hispanic origin and race questions, and emphasized the need for both pieces of information.

Furthermore, there was a change in the processing of the Hispanic origin and race responses. In the 1990 census, respondents provided Hispanic origin responses in the race question and race responses in the Hispanic origin question. In 1990, the Hispanic origin question and the race question had separate edits; therefore, although information may have been present on the questionnaire, it was not fully utilized due to the discrete nature of the edits. However, for Census 2000, there was a joint race and Hispanic origin edit that utilized Hispanic origin and race information, regardless of the location.

SECTION VI
PRIVATE SECTOR IMPEDIMENTS ANALYSIS
A. INTRODUCTION

Section VI presents the analysis of 11 potential or actual private sector impediments to fair housing choice. Private sector impediments are discriminatory practices prohibited by the 1968 federal Fair Housing Act, as amended, and the California Fair Employment and Housing Act. Table VI-1 lists the pages which discuss each impediment.

<table>
<thead>
<tr>
<th>Fair Housing Impediment</th>
<th>Page References</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population Diversity</td>
<td>VI-1 to VI-4</td>
</tr>
<tr>
<td>Housing Discrimination</td>
<td>VI-5 to VI-7</td>
</tr>
<tr>
<td>Brokerage Services</td>
<td>VI-8 to VI-9</td>
</tr>
<tr>
<td>Steering</td>
<td>VI-9 to VI-10</td>
</tr>
<tr>
<td>Appraisal Practices</td>
<td>VI-10 to VI-12</td>
</tr>
<tr>
<td>Lending Practices</td>
<td>VI-12 to VI-20</td>
</tr>
<tr>
<td>Homeowner’s Insurance</td>
<td>VI-20 to VI-22</td>
</tr>
<tr>
<td>Blockbusting/Panic Selling</td>
<td>VI-22</td>
</tr>
<tr>
<td>Property Management Practices</td>
<td>VI-23 to VI-29</td>
</tr>
<tr>
<td>Discriminatory Advertising</td>
<td>VI-29 to VI-32</td>
</tr>
<tr>
<td>Hate Crimes</td>
<td>VI-32 to VI-33</td>
</tr>
</tbody>
</table>

The format for presenting information on each potential or actual impediment includes:

- Background — an explanation of why a specific practice is prohibited and how it creates an impediment to fair housing choice.
- Analysis — a discussion of data to determine if the prohibited discriminatory practices create an impediment to fair housing choice.
- Conclusions and Recommendations — a brief explanation of whether an impediment to fair housing choice exists and recommended actions that will be implemented by the City and Fair Housing Foundation, the City’s fair housing provider.

B. POPULATION DIVERSITY

1. Background

HUD’s 1996 *Fair Housing Planning Guide* states:

In the AI, the jurisdiction should describe the degree of segregation by race and ethnicity.

The metrics for measuring population diversity, meaning the level of racial integration and segregation, include:

- Index of Dissimilarity
- Racially/ethnically concentrated areas of poverty (R/ECAPs)
- Areas of minority population concentration
2. Analysis

a. Index of Dissimilarity

The U.S. Census Bureau explains that an index of dissimilarity measures the percentage of a group's population that would have to change residence for each neighborhood to have the same percentage of that group as the metropolitan area overall. The index ranges from 0.0 (complete integration) to 1.0 (complete segregation).

HUD’s *Assessment of Fair Housing Tool for Local Governments* states that the Index of Dissimilarity measures the degree to which two groups are evenly distributed across a geographic area and is a commonly used tool for assessing residential segregation between two groups.

HUD defines three segregation levels:

<table>
<thead>
<tr>
<th>Dissimilarity Index Value (0-100)</th>
<th>Value</th>
<th>Level of Segregation</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-39.99</td>
<td>Low</td>
<td>Segregation</td>
</tr>
<tr>
<td>40-54.99</td>
<td>Moderate</td>
<td>Segregation</td>
</tr>
<tr>
<td>55-100</td>
<td>High</td>
<td>Segregation</td>
</tr>
</tbody>
</table>

Brown University’s Diversity and Disparities database has calculated an Index of Dissimilarity for cities throughout the United States. According to Brown University, a value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different census tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low.

Using 2010 Census data, Brown University calculated the City of Bellflower’s Index of Dissimilarity and the index reveals a Low Segregation Level for all racial/ethnic group pairings as follows:

- White-Black/Black-White 25.8
- White-Hispanic/Hispanic-White 18.1
- White-Asian/Asian-White 10.0
- Black-Hispanic/Hispanic-Black 20.3
- Black-Asian/Asian-Black 18.9
- Hispanic-Asian/Asian-Hispanic 12.9

The link to Brown University’s Diversity and Disparities database is [https://s4.ad.brown.edu/projects/diversity/](https://s4.ad.brown.edu/projects/diversity/)

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

To assist communities in identifying racially or ethnically-concentrated areas of poverty, HUD developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test:

- A nonwhite population of 50% or more
- A poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan area, whichever threshold is lower
Table VI-2 shows that none of Bellflower’s census tract has a poverty rate of 40% or more. Therefore, the City has no racially/ethnically concentrated areas of poverty.

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Universe</th>
<th>Number Below Poverty Line</th>
<th>Percent Below Poverty Line</th>
</tr>
</thead>
<tbody>
<tr>
<td>5541.05</td>
<td>4,569</td>
<td>1,137</td>
<td>24.90%</td>
</tr>
<tr>
<td>5541.04</td>
<td>2,487</td>
<td>579</td>
<td>23.30%</td>
</tr>
<tr>
<td>5544.03</td>
<td>5,504</td>
<td>1,258</td>
<td>22.90%</td>
</tr>
<tr>
<td>5541.01</td>
<td>3,655</td>
<td>806</td>
<td>22.10%</td>
</tr>
<tr>
<td>5543.02</td>
<td>4,400</td>
<td>860</td>
<td>19.50%</td>
</tr>
<tr>
<td>5544.04</td>
<td>4,018</td>
<td>685</td>
<td>17.00%</td>
</tr>
<tr>
<td>5544.05</td>
<td>3,045</td>
<td>510</td>
<td>16.70%</td>
</tr>
<tr>
<td>5542.04</td>
<td>4,405</td>
<td>624</td>
<td>14.20%</td>
</tr>
<tr>
<td>5540.02</td>
<td>5,834</td>
<td>799</td>
<td>13.70%</td>
</tr>
<tr>
<td>5540.01</td>
<td>3,627</td>
<td>440</td>
<td>12.10%</td>
</tr>
<tr>
<td>5544.06</td>
<td>4,888</td>
<td>562</td>
<td>11.50%</td>
</tr>
<tr>
<td>5531</td>
<td>6,941</td>
<td>684</td>
<td>9.90%</td>
</tr>
<tr>
<td>5543.01</td>
<td>3,348</td>
<td>310</td>
<td>9.30%</td>
</tr>
<tr>
<td>5541.03</td>
<td>1,520</td>
<td>129</td>
<td>8.50%</td>
</tr>
<tr>
<td>5542.03</td>
<td>3,579</td>
<td>294</td>
<td>8.20%</td>
</tr>
<tr>
<td>5533</td>
<td>3,092</td>
<td>248</td>
<td>8.00%</td>
</tr>
<tr>
<td>5532</td>
<td>7,474</td>
<td>496</td>
<td>6.60%</td>
</tr>
<tr>
<td>5542.01</td>
<td>4,641</td>
<td>229</td>
<td>4.90%</td>
</tr>
<tr>
<td>Total</td>
<td>77,027</td>
<td>10,650</td>
<td>13.80%</td>
</tr>
</tbody>
</table>

Source: American Community Survey (ACS) 5-Year Estimates, Table S1701: Poverty Status in the Past 12 Months

**c. Areas of Minority Population Concentration**

HUD rules require the City’s Consolidated Plan to describe any area of minority concentration and state how the jurisdiction defines the term “area of minority concentration.” Neither the Consolidated Plan rules nor the 1996 *Fair Housing Planning Guide* offers guidance on how the City should define an area of minority concentration.

The 2020-2025 Consolidated Plan describes the guidance provided by HUD on what constitutes a concentration. The standard selected by the Consolidated Plan is when a neighborhood’s total percentage of minority persons is at least 20 percentage points higher than the total percentage of all minorities for the Metropolitan Statistical Area (MSA) as a whole.

The City is located within Los Angeles-Long Beach–Santa Ana CA Metro Area. The minority population percentage of the Metro Area is 68.5% (8,802,783/12,849,383). Thus, an area of minority concentration is a census tract having 88.5% of the population identifying with a
minority group. Five census tracts have a minority population of 88.5% or more: 5541.01, 5541.04, 5542.04, 5543.01, and 5543.02.


Population projections by race and ethnicity for the City are unavailable as they have not been prepared by the State Department of Finance (DOF), the Southern California Association of Governments (SCAG) or other governmental agencies. SCAG’s Connect SoCal Program prepared population and household projections to 2045. The projections suggest a modest growth of 200 households and 300 people between 2020 and 2045.

3. Conclusions and Recommendations

Although the City as whole has a low segregation level, there are five neighborhoods with concentrations of minority populations. Two of these neighborhoods also experience poverty rates of 20% or more. Four of the five neighborhoods are low resource neighborhoods, a category of neighborhoods described on pages VIII-2 to VIII-5.

Areas of minority population concentration and high poverty rates create an impediment to fair housing because the neighborhoods lack access to opportunity; for example, educational and employment opportunities.

Actions to ameliorate this impediment involve improvements to the neighborhood, creating incentives for market rate housing development, and enhancing the economic mobility of residents.

In FY 2021-2022, the City will take the following actions:

Action 1: Evaluate Place-Based Strategies

- Evaluate place-based strategies that could be effectively implemented in the neighborhoods with minority population concentrations, high poverty rates, and low resources.

Action 2: Reduce Neighborhood Poverty Levels

- Implement the Consolidated Plan Anti-Poverty Strategy.

Action 3: Develop Market Rate Housing

- Encourage the development of market rate housing in neighborhoods with minority population concentrations, high poverty rates, and low resources.
C. HOUSING DISCRIMINATION

1. Background - Prohibited Housing Discriminatory Practices

Sections 804 (a), (b), and (d) of the 1968 Fair Housing Act, as amended, describes several prohibited housing discriminatory practices such as the following:

(a) To refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin. [Emphasis added]

(b) To discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, sex, familial status, or national origin. [Emphasis added]

(d) To represent to any person because of race, color, religion, sex, handicap, familial status, or national origin that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available. [Emphasis added]

The California Fair Employment and Housing Act (FEHA) prohibits unlawful practices similar to those that are described in the 1968 Federal Fair Housing Act, as amended. The State law expands the description of prohibited practices to -harassment, and to -harass, evict, or otherwise discriminating for the purpose of -retaliation against a protected class. Moreover, the State law expands the protected classes to include, among others, sexual orientation, marital status, ancestry, age, and source of income.

2. Analysis - Housing Discrimination Complaints

Housing discrimination complaints can be filed directly with HUD. In California, the housing discrimination complaints are processed by HUD’s San Francisco Office of Fair Housing and Equal Opportunity (FHEO). Bellflower residents may also file complaints with the State Department of Fair Employment and Housing (DFEH), and the Fair Housing Foundation (FHF).

Twenty-four Bellflower residents filed fair housing discrimination complaints with HUD between calendar year 2010 through May 2019. Table III-1 shows that the most frequent basis for the complaints were disability, race, familial status, and retaliation. Section IV provides definitions of these and other protected classes.

There are a myriad of issues or alleged acts triggering the housing discrimination complaints. Some of the issues or alleged acts included discriminatory refusal to rent; discriminatory advertising; failure to make reasonable accommodation; and discriminatory terms, conditions, privileges, or services and facilities.

In the majority of cases, HUD was able to successfully reach a conciliation/settlement. However, for 16 of the 41 complaints filed, HUD made a —no cause determination.

Table VI-4 shows that in the past four fiscal years 63 fair housing inquiries or allegations have been filed with the Fair Housing Foundation. Almost 50% of the complaints were made on the basis of a physical or mental disability. However, the Fair Housing Foundation investigates some cases and often finds no evidence to sustain the allegations.
Table VI-3
City of Bellflower
Housing Discrimination Complaints by Protected Class
2010 to May 2019
(Filed with U.S. Department of Housing and Urban Development)

<table>
<thead>
<tr>
<th>Protected Class</th>
<th>Number of Cases</th>
<th>Percentage Distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability</td>
<td>7</td>
<td>29.3%</td>
</tr>
<tr>
<td>Race</td>
<td>5</td>
<td>20.8%</td>
</tr>
<tr>
<td>Familial Status</td>
<td>4</td>
<td>16.7%</td>
</tr>
<tr>
<td>Retaliation</td>
<td>4</td>
<td>16.7%</td>
</tr>
<tr>
<td>National Origin</td>
<td>2</td>
<td>8.3%</td>
</tr>
<tr>
<td>Sex</td>
<td>1</td>
<td>4.1%</td>
</tr>
<tr>
<td>Color</td>
<td>1</td>
<td>4.1%</td>
</tr>
<tr>
<td>Total</td>
<td>24</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: U.S. Department of Housing and Urban Development, San Francisco Office Fair Housing and Equal Opportunity

Table VI--4
City of Bellflower
Fair Housing Inquiries/Allegations by Protected Class
FY 2015/2016 to FY 2018/2019
(Filed with the Fair Housing Foundation)

<table>
<thead>
<tr>
<th>Protected Class</th>
<th>Number of Cases</th>
<th>Percentage Distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disability</td>
<td>36</td>
<td>57.1%</td>
</tr>
<tr>
<td>Familial Status</td>
<td>10</td>
<td>15.9%</td>
</tr>
<tr>
<td>Race</td>
<td>9</td>
<td>14.3%</td>
</tr>
<tr>
<td>Source of Income</td>
<td>3</td>
<td>4.8%</td>
</tr>
<tr>
<td>National Origin</td>
<td>2</td>
<td>3.2%</td>
</tr>
<tr>
<td>Gender</td>
<td>2</td>
<td>3.2%</td>
</tr>
<tr>
<td>Arbitrary</td>
<td>1</td>
<td>1.5%</td>
</tr>
<tr>
<td>Total</td>
<td>63</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: Fair Housing Foundation, Annual Reports, FY 2015/2016 to FY 2018/2019

Thirty percent of the respondents to the Analysis of Impediments to Fair Housing Choice indicated they believe that housing discrimination occurs in Bellflower.

HUD also has advised cities that the number of complaints filed at HUD does not necessarily reflect the actual occurrences of discrimination within a city. Studies have indicated that a very small fraction of people who believe they've been a victim of housing discrimination actually contact HUD to file a complaint, according to Chloe Coe, Equal Opportunity Specialist, Fair Housing and Equal Opportunity (FHEO) – San Francisco.

VI-6
Because of this fact, neither the number of complaints nor the number of proven complaints is an accurate indicator of the incidence of discrimination in the Bellflower housing market.

Twelve percent of the respondents to the Analysis of Impediments to Fair Housing Choice Survey indicated they or someone they know have experienced housing discrimination. The vast majority of respondents indicated they would report an incident of housing discrimination or contact the person who discriminated against them.

3. Conclusions and Recommendations

Housing discrimination, particularly on the basis of disability, race, and familial status, is an impediment to fair housing choice. Based on past trends, it is estimated that 12 housing discrimination complaints may be filed by Bellflower residents with HUD during the five year period between FY 2020-2021 and FY 2024-2025. During the same period, it is estimated that 80 housing discrimination complaints may be filed with the FHF.

Housing discrimination is an impediment to fair housing choice. The City will take the following actions to remove or mitigate this impediment to fair housing choice:

Action 1: Continue to Provide Fair Housing Services

- During the five-year period from FY 2020-2021 through FY 2024-2025, the City will have the FHF provide fair housing services which will include the processing of housing discrimination complaints and landlord/tenant counseling services. Often a landlord/tenant issue has as its basis a housing discrimination concern.

Action 2: Provide Targeted Fair Housing Education and Outreach

- The FHF will collaborate and coordinate with multiple agencies, including lenders, realtors, and cultural groups to provide increased efforts in educating residents. The FHF should target this education and outreach to various special needs groups including, but not limited to: the disabled, the elderly, persons living with HIV/AIDS, low- and moderate-income large families, and minorities.

Action 3: Increase Fair Housing Services to Include Periodic Testing

- The City will collaborate with the Fair Housing Foundation to increase the Scope of Work to provide period testing throughout the City, particularly in the rental and lending markets.

Action 4: Increase Fair Housing Awareness and Education through the City’s website.

- The City, on its website, will increase efforts in educating residents on potential sources of discrimination and avenues to address fair housing by providing links to relevant information. Issues such as foreclosures, loan modifications, and short sales should be included, and the information should be provided in the English, Spanish and Asian languages.
D. BROKERAGE SERVICES

1. Background – Denial of Access to Real Estate Organizations

Section 3606 of the 1968 Federal Fair Housing Act prohibits discrimination in the provision of brokerage services:

After December 31, 1968, it shall be unlawful to deny any person access to or membership or participation in any multiple-listing service, real estate brokers’ organization or other service, organization, or facility relating to the business of selling or renting dwellings, or to discriminate against him in the terms or conditions of such access, membership, or participation, on account of race, color, religion, sex, handicap, familial status, or national origin. [Emphasis added]

2. Rancho Southeast Association of REALTORS (RSAOR)

Real estate professionals whose business is located in the City of Bellflower most likely belong to the Rancho Southeast Association of REALTORS (RSAOR). The headquarters of RSAOR is located at 10900 E. 183rd Street, Suite 120, Cerritos, CA 9070.

The President Elect is Joanne Brown of JB Real Estate and Investment, Inc. Ms. Brown is Black/African American. Sandra Lopez is the Interim Association Executive.

According to a membership profile, the race and ethnicity of California REALTORS is as follows:

- White 77%
- Asian/Pacific Islander 11%
- Hispanic/Latino 9%
- Black/African American 3%
- Other/American Indian/Eskimo/Aleut 4%

Source: California Association of REALTORS, 2013 Member Profile – California Report.

An overlap between the White and Hispanic/Latino groups results in the total exceeding 100%. There are no comparable figures on the race and ethnicity of the real estate professionals who belong to RSAOR. Because of the demographic make-up of the City, it is assumed that more than 9% of the local real estate professionals identify with the Hispanic/Latino ethnicity group.

The Rancho Southeast Association of REALTORS Bylaws state that among the qualifications for membership is to -Have no record of official sanctions rendered by the courts or other lawful authorities for (i) violations of civil rights laws or real estate license laws within the past three years....

RSAOR's 4-page application for membership does not inquire about the race or ethnicity of the applicant.

The California law requires brokers and real estate agents to complete a fair housing course at the time of license renewal, which happens every four years.
Neither the FHF nor HUD-San Francisco compiles data on discriminatory brokerage services. The HUD headquarters in Washington, D.C. and Fair Housing Assistance Program (FHAP) agencies record discriminatory practices in categories known as -issues. If a single complaint alleges multiple issues, it is counted under each issue alleged. In the five fiscal years between 2013 and 2017, 41,674 issues were counted of which 209 or 0.5% involved discriminatory brokerage practices.

3. Conclusions and Recommendations

Brokerage services as defined by the 1968 Federal Fair Housing Act pertain to having equal access to membership and participation in an Association of REALTORS and the MLS. The SEAOR membership application does not inquire about the characteristics of the applicant other than license status and experience. Consequently, the SEAOR does not prevent membership by individuals who belong to one or more of the protected classes. It is determined that the provision of brokerage services is not an impediment to fair housing choice.

E. STEERING

1. Background - Prohibited Steering Practices

HUD’s 1996 Fair Housing Planning Guide states that a private sector impediment is -steering.

Examples of prohibited steering practices include:

- A REALTOR deliberately guiding potential purchasers toward or away from certain neighborhoods because of membership in a protected class.
- A lender who deliberately guides loan applicants toward or away from certain types of loans because of membership in a protected class.
- Limiting a renter's housing choices by guiding or encouraging the person to look elsewhere, based on a fair housing protected characteristic. This type of steering mostly affects apartment seekers as opposed to in-place tenants.

2. Analysis of Steering

As previously noted, HUD annually counts discriminatory practices in categories known as -issues. In the five fiscal years between 2013 and 2017, 41,674 issues were counted of which 368 or 0.9% involved steering.

The steering of home buyers probably happens less frequently than in the past because the internet enables home buyers to be more active in the search process and less reliant on REALTORS. According to the California Association of REALTORS 2015 Home Buyers Survey buyers on average spend 15 weeks investigating homes and neighborhoods before contacting an agent. Although 55% of buyers found a home through an agent, 18% found it using a website, 11% a for sale sign, and 8.5% at an open house. Zillow and Realtor.com are the considered by buyers as the most useful websites when they search for a home. In addition, the vast majority of buyers used mobile devices to research homes and neighborhoods and to take photos of homes/amenities/neighborhoods.
The use of the internet and mobile devices does potentially create risks in the home buying process. Several state Attorney Generals have concluded that—

…the growing role of data analytics and online platforms in the housing sale and rental markets means that risks are greater that segments of society will be steered away from or denied housing in a way that is immune to examination of intent yet results in even more segregated housing patterns.


3. Conclusions and Recommendations

Steering may adversely impact homebuyers in their search process and when they apply for a loan. Steering also may adversely impact in-place renters and rental apartment seekers. Corrective actions have been taken by the federal and state governments regarding loan steering so that abuse may not happen in the future as frequently as it occurred in the early to mid-2000s. However, the steering of apartment seekers is likely to continue, although it is not possible to measure its frequency.

Although incidents of steering cannot be precisely quantified, there is evidence that it exists. Steering, therefore, creates an impediment to fair housing choice.

The City will take the following actions to remove or mitigate this impediment to fair housing choice:

**Action 1: Provide Information on Steering at Consumer Fair Housing Workshops**

- During the five-year period from FY 2020-2021 through FY 2024-2025, the FHF in their Consumer Fair Housing Workshops will provide 1) examples of how to detect steering when using the internet to conduct a home search process; 2) examples of how to detect loan steering; and 3) examples of steering that could be experienced by in-place tenants and apartment seekers.

**Action 2: Provide Information on Steering at Landlord Workshops**

- During the five-year period from FY 2020-2021 through FY 2024-2025, the FHF in their Landlord Workshops will provide information on steering.

F. APPRAISAL PRACTICES

1. Background – Prohibited Appraisal Practices

The 1968 Federal Fair Housing Act, as amended, makes it unlawful to discriminate against a protected class in appraising property. An appraisal is a written assessment of market value and is used by mortgage underwriters to determine whether there is sufficient collateral to lend money to a homebuyer. Unlawful discriminatory appraisal practices, for example, may include:

- Taking into account the race and ethnic make-up of a neighborhood
Taking into the account the race and ethnicity of the seller and/or buyer

2. Analysis of Appraisal Practices

Homebuyers requiring a loan to buy a home are given the opportunity to review an appraisal report. In 2018, 280 home loans were approved which is an indicator of the number of homebuyers who were given the opportunity to review an appraisal report.

The Uniform Residential Appraisal Report is a six page form used by appraisers to determine the value of a home. In bold letters, the form states:

Note: Race and the racial composition of the neighborhood are not appraisal factors.

At the end of the report, there are —appraiser’s certifications— which include certification #17:

I did not base, either partially or completely, my analysis and/or opinion of market value in this appraisal report on the race, color, religion, sex, age, marital status, handicap, familial status, or national origin of either the prospective owners or occupants of the subject property or of the present owners or occupants of the properties in the vicinity of the subject property or on any other basis prohibited by law.

Contained in the Standards section is Standard Rule 6-3 which deals with neighborhood trends when appraising a property and encourages appraisers to avoid stereotyped or biased assumptions relating to race, age, color, gender, or national origin or an assumption that race, ethnic, or religious homogeneity is necessary to maximize value in a neighborhood. [Emphasis added]

Under both federal law (the Equal Credit Opportunity Act of 1976 and its implementing regulations) and California law (Business & Professions Code Section 11423), a lender is generally obligated to inform a credit applicant of the right to receive a copy of the appraisal used in connection with an application, and to honor the applicant’s written request for a copy of the appraisal report.

The California Association of REALTORS (CAR) explains that one of the reasons a buyer should obtain an appraisal is —

To make sure the lender has not engaged in any discriminatory practices.

Consequently, a homebuyer/borrower is entitled to a copy of the appraisal. But a homebuyer and borrower during the purchase process has a bewildering array of documents to review and sign. Additionally, given an appraisal to review, they may not have the knowledge to review an appraisal report to determine if, for example, race or ethnicity were considered in making the appraisal.

3. Conclusions and Recommendations

Complaints regarding discriminatory appraisal practices are not routinely collected by local, state or federal agencies. Data are unavailable to demonstrate if discriminatory appraisal practices have adversely impacted some of the real estate transactions in Bellflower.
Although no impediment was found to exist, the City will take following action to affirmatively further fair housing:

**Action 1: Provide Information on the Appraisal Process at Consumer Fair Housing Workshops**

- In FY 2020-2021 to FY 2024-2025, the FHF will describe the appraisal process and the contents of an appraisal report at their Consumer Fair Housing Workshops.

**G. LENDING PRACTICES**

1. **Background**

   Equal access to credit so that borrowers can purchase a home is a fundamental goal of fair housing. Section 805 of the 1968 Federal Fair Housing Act, as amended, and the Equal Credit Opportunity Act of 1976 prohibit the denial of access to credit because of a loan applicant’s race, color, religion, sex, handicap, familial status, or national origin.

   According to the Consumer Financial Protection Bureau:

   The Home Mortgage Disclosure Act (HMDA) is a data collection, reporting, and disclosure statute that was enacted in 1975. HMDA data are used to assist in determining whether financial institutions are serving the housing needs of their local communities; facilitate public entities’ distribution of funds to local communities to attract private investment; and help identify possible discriminatory lending patterns. Institutions covered by HMDA are required to annually collect and report specified information about each mortgage application acted upon and mortgage purchased during the prior calendar year. The data include the disposition of each application for mortgage credit; the type, purpose, and characteristics of each home mortgage application or purchased loan; the census-tract designations of the properties; loan pricing information; demographic and other information about loan applicants, including their race, ethnicity, sex, and income; and information about loan sales.

   Source: Consumer Financial Protection Bureau, *Data Point: 2018 Mortgage Market Activity and Trends: A First Look at the 2018 HMDA Data*, page 1

   For calendar year 2018, 5,666 institutions in the country reported HMDA data, down 3.9% from the 5,897 which reported in 2017.

2. **Analysis of 2018 City of Bellflower Home Mortgage Disclosure Act (HMDA) Data**

   a. **HMDA Data on Loan Applications**

   CY 2018 HMDA data are reported by lenders according to the 2010 census tract boundaries. CY 2019 HMDA will not be available for analysis until September 2020.

   Lending institutions can take up to eight actions on a loan application as follows:

   1. Loan originated
2. Application approved but not accepted (by applicant)
3. Application denied by financial institution
4. Application withdrawn by applicant
5. File closed for incompleteness
6. Loan purchased by the institution
7. Preapproval denied by financial institution
8. Preapproval approved but not accepted (by applicant)

The HMDA data includes the disposition of each loan application (e.g. originated, denied). The race, ethnicity and income of the applicant also are noted by the lender as well as the census tract location of the home to be purchased. The HMDA data can be used to calculate loan denial rates by race, ethnicity, income and census tract.

Loan denial rates are computed on the basis of denied applications divided by loans originated + approved applications not accepted + applications denied. The first three actions are considered because those actions represent applications that were completely processed and either were approved or denied.

The Consumer Financial Protection Bureau’s summary of nationwide denial rates is presented below:

Denial rates for home-purchase applications were generally lower in 2018 than in prior years. The overall denial rate on applications for conventional and nonconventional home-purchase loans was 9.8 percent in 2018, 0.9 percent lower than in 2017. The denial rate for each racial/ethnic group declined from 2017 to 2018. These declines in 2018 continue a general trend in recent years of declining denial rates for home-purchase mortgages.

Variations in raw denial rates over time reflect not only changes in credit standards, but also changes in the demand for credit and in the composition of borrowers applying for mortgages. For example, the denial rate on applications for conventional home-purchase loans was lower in 2018 than during the housing boom years, even though most measures of credit availability suggest that credit standards were tighter in 2018. This may stem from a relatively large drop in applications from riskier applicants or in applications that are risky for other reasons, such as documentation or collateral risk.

As in past years, Black and Hispanic White borrowers had notably higher denial rates in 2018 than non–Hispanic White and Asian borrowers. For example, the denial rates for conventional home-purchase loans were 16.9 percent for Black borrowers and 12.1 percent for Hispanic White borrowers. In contrast, denial rates for such loans were 9.6 percent for Asian borrowers and 6.8 percent for non–Hispanic White borrowers. Previous research and experience in the fair lending supervisory process show that differences in denial rates and in the incidence of higher-priced lending ... among racial and ethnic groups stem, at least in part, from factors related to credit risk. Those factors—such as credit history (including credit score), ratio of total monthly debt to total monthly income (DTI ratio), and CLTV ratio—are now revealed for the first time in the 2018 HMDA data.

Source: Consumer Financial Protection Bureau, Data Point: 2018 Mortgage Market Activity and Trends: A First Look at the 2018 HMDA Data, page 36 and 40
b. Analysis of City of Bellflower HMDA Data

1. 2018 FHA/VA/FSA and Conventional Loan Volumes and Loan Dispositions

Table VI-5 shows that in 2018 a total of 313 FHA/VA and conventional loan applications were submitted to lenders to purchase homes located in Bellflower:

- FHA/VA/FSA Loans   98   31.3%
- Conventional Loans  215  68.7%
- Total             313  100.0%

A conventional loan is secured by investors, but neither insured by the FHA nor guaranteed by VA. Both fixed rate and adjustable rate loans are available with conventional financing.

The final disposition of the 313 loan applications was as follows:

- Approved         280  89.5%
- Denied           33   10.5%
- Total            313  100.0%

Approved loans include loans originated and loan applications approved by the lender but not accepted by the borrower. The denied loans represented 10.5% of all loan applications, a percentage less than 1% higher than the nationwide denial rate of 9.8%.

2. Loan Denial Rates by Type of Financing

Table VI-5 also shows the FHA/VA/FSA and conventional loan denial rates. In 2018, the FHA/VA/FSA market share was 31.3% - 98 of 313 loan applications. Of the 98 applications, 12.2% were denied. In 2018, the 215 conventional loan applications comprised 68.7% of all 313 loan applications. Of the 215 applications, 9.8% were denied.

3. Loan Denial Rates by Household Income and Type of Financing

Table VI-6 shows the denial rates by five income categories and type of financing. Household income can be a key determinant in whether a borrower has a loan application approved. Higher incomes, however, do not always correlate with low denial rates and vice versa.

For example, among the FHA/VA/FSA borrowers, applicants with incomes in the $80,000 to $99,999 had the highest denial rate at 26.3%. None of the loan applicants with yearly incomes below $80,000 were denied loans. Loan denial rates among the FHA/VA/FSA borrowers are not correlated with household income.

Among the conventional loan applicants, borrowers with incomes between $40,000 and $60,000 had the highest denial rate (28.6%). All loan applicants with annual incomes of $60,000 or more had low denial rates. The loan denial rates of conventional loan borrowers are correlated with household income.
### Table VI-5
City of Bellflower
FHA/VA/FSA and Conventional Loan Applications and Denial Rates: 2018

<table>
<thead>
<tr>
<th>Type of Application</th>
<th>Bellflower Applications</th>
</tr>
</thead>
<tbody>
<tr>
<td>FHA/VA/FSA</td>
<td></td>
</tr>
<tr>
<td>Total Applications</td>
<td>98</td>
</tr>
<tr>
<td>Number Denied</td>
<td>12</td>
</tr>
<tr>
<td>Percent Denied</td>
<td>12.2%</td>
</tr>
<tr>
<td>Conventional Loans</td>
<td></td>
</tr>
<tr>
<td>Total Applications</td>
<td>215</td>
</tr>
<tr>
<td>Number Denied</td>
<td>21</td>
</tr>
<tr>
<td>Percent Denied</td>
<td>9.8%</td>
</tr>
<tr>
<td>All Loans</td>
<td></td>
</tr>
<tr>
<td>Total Applications</td>
<td>313</td>
</tr>
<tr>
<td>Number Denied</td>
<td>33</td>
</tr>
<tr>
<td>Percent Denied</td>
<td>10.5%</td>
</tr>
</tbody>
</table>

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act (HMDA) 2018
### Table VI-6
City of Bellflower
FHA/VA and Conventional Loan Denial Rates
By Household Income: 2018

<table>
<thead>
<tr>
<th>Loan Type and Income</th>
<th>Number of Applications</th>
<th>Number Denied</th>
<th>Percent Denied</th>
</tr>
</thead>
<tbody>
<tr>
<td>FHA/VA/FSA Loans</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>&lt;$40,000</td>
<td>4</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>$40,000-$59,999</td>
<td>0</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>$60,000-$79,999</td>
<td>11</td>
<td>0</td>
<td>0.0%</td>
</tr>
<tr>
<td>$80,000-$99,999</td>
<td>19</td>
<td>5</td>
<td>26.3%</td>
</tr>
<tr>
<td>$100,000+</td>
<td>64</td>
<td>7</td>
<td>10.9%</td>
</tr>
<tr>
<td>Total</td>
<td>98</td>
<td>12</td>
<td>12.2%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Conventional Loans</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;$40,000</td>
<td>6</td>
<td>1</td>
<td>16.7%</td>
</tr>
<tr>
<td>$40,000-$59,999</td>
<td>14</td>
<td>4</td>
<td>28.6%</td>
</tr>
<tr>
<td>$60,000-$79,999</td>
<td>23</td>
<td>1</td>
<td>4.3%</td>
</tr>
<tr>
<td>$80,000-$99,999</td>
<td>39</td>
<td>3</td>
<td>7.7%</td>
</tr>
<tr>
<td>$100,000+</td>
<td>133</td>
<td>12</td>
<td>9.0%</td>
</tr>
<tr>
<td>Total</td>
<td>215</td>
<td>21</td>
<td>9.8%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>All Loans</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;$40,000</td>
<td>10</td>
<td>1</td>
<td>10.0%</td>
</tr>
<tr>
<td>$40,000-$59,999</td>
<td>14</td>
<td>4</td>
<td>28.6%</td>
</tr>
<tr>
<td>$60,000-$79,999</td>
<td>34</td>
<td>1</td>
<td>2.9%</td>
</tr>
<tr>
<td>$80,000-$99,999</td>
<td>58</td>
<td>8</td>
<td>13.8%</td>
</tr>
<tr>
<td>$100,000+</td>
<td>197</td>
<td>19</td>
<td>9.6%</td>
</tr>
<tr>
<td>Total</td>
<td>313</td>
<td>33</td>
<td>10.5%</td>
</tr>
</tbody>
</table>

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act (HMDA) 2018
4. *Loan Denial Rates by Race and Ethnicity*

Table VI-7 shows the number and percentage of loan applications by race and ethnicity. Hispanic borrowers comprised approximately 40% of all loan applicants. Table VI-8 shows the loan denial rate for FHA/VA Hispanic borrowers was 11.9% and for conventional loan applicants it was 10.7%.

The "all other" race/ethnicity group comprised 19.5% of all borrowers. The FHA/VA and conventional loan denial rates for this group were 22.7% and 5.1%, respectively.

The loan applications made by White, Non-Hispanic, Asian and Black borrowers as well as their denial rates are reported in Tables VI-7 and VI-8.

**Table VI-7**
*City of Bellflower*
*Total Loan Applicants by Race/Ethnicity: 2018*

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Number of Loan Applicants</th>
<th>Percentage Distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, Non-Hispanic</td>
<td>44</td>
<td>14.1%</td>
</tr>
<tr>
<td>Hispanic¹</td>
<td>126</td>
<td>40.3%</td>
</tr>
<tr>
<td>All Other²</td>
<td>61</td>
<td>19.5%</td>
</tr>
<tr>
<td>Asian</td>
<td>40</td>
<td>12.8%</td>
</tr>
<tr>
<td>Black</td>
<td>42</td>
<td>13.4%</td>
</tr>
<tr>
<td>Total</td>
<td>313</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

¹Includes applications where ethnicity was checked as —Joint— meaning a Hispanic applicant and a co-applicant that was Not Hispanic or Latino.
²Includes applications where the applicants race was checked as American Indian or Alaska Native; Native Hawaiian or Other Pacific Islander; two or more minority races; joint; and race/ethnicity not available.

Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act (HMDA) 2018.
The findings of particular interest include:

- None of the FHA/VA loan applications submitted by White, Non-Hispanic borrowers was denied.
- Asian and all other conventional loan applicants had very low loan denial rates.
- The all other FHA/VA loan applicants experienced the highest loan denial rate of 22.7%.

The Mortgage Bankers Association (MBA) has stated that an indicator of possible discriminatory lending practices is minority borrower denial rates exceeding those of White, Non-Hispanic borrowers by a ratio exceeding 2 to 1. Among conventional loan applicants, none of ratios are close to 2 to 1. The MBA suggested indicator cannot be used for the FHA/VA applicants because the White, Non-Hispanic and Asian borrowers had no loan applications denied.

5. **Loan Denial Rates by Census Tract**

According to HUD, the analysis of loan denial rates by census tract provides insights on whether redlining by lenders is generating high loan denial rates, particularly in predominantly minority neighborhoods. Redlining describes a situation where mortgage services are denied or limited for two specific reasons:

- The racial and/or ethnic composition of a neighborhood’s residents
- The age of a neighborhood’s homes

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VI-18
SECTION VI  PRIVATE SECTOR IMPEDIMENTS ANALYSIS

Redlining is a term whose origins come from lenders practice of outlining in red those geographical areas that were perceived to pose a higher mortgage risk. Redlining can adversely affect a particular street, block, census tract, or an entire city.

In 2018, loan applications were made to buy homes located in 18 census tracts. On a census tract basis, the number of loan applications ranged from a low of two (5541.04) to a high of 49 (5532.00). The denial rates on a census tract basis ranged from a low of 0.0% (three census tracts) to a high of 23.1% (5543.02). Table VI-9 lists denial rates by census tract.

Table VI-9
City of Bellflower
Loan Denial Rates by Census Tract: 2018

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Total Applications</th>
<th>Total Denied</th>
<th>Percent Denied</th>
<th>Percent Minority</th>
</tr>
</thead>
<tbody>
<tr>
<td>5543.02</td>
<td>13</td>
<td>3</td>
<td>23.1%</td>
<td>94.4%</td>
</tr>
<tr>
<td>5543.01</td>
<td>9</td>
<td>2</td>
<td>22.2%</td>
<td>89.5%</td>
</tr>
<tr>
<td>5544.04</td>
<td>9</td>
<td>2</td>
<td>22.2%</td>
<td>86.1%</td>
</tr>
<tr>
<td>5541.01</td>
<td>10</td>
<td>2</td>
<td>20.0%</td>
<td>92.2%</td>
</tr>
<tr>
<td>5540.02</td>
<td>13</td>
<td>2</td>
<td>15.4%</td>
<td>83.8%</td>
</tr>
<tr>
<td>5542.04</td>
<td>7</td>
<td>1</td>
<td>14.3%</td>
<td>88.6%</td>
</tr>
<tr>
<td>5531.00</td>
<td>24</td>
<td>3</td>
<td>12.5%</td>
<td>82.1%</td>
</tr>
<tr>
<td>5532.00</td>
<td>49</td>
<td>6</td>
<td>12.2%</td>
<td>85.3%</td>
</tr>
<tr>
<td>5544.03</td>
<td>9</td>
<td>1</td>
<td>11.1%</td>
<td>84.4%</td>
</tr>
<tr>
<td>5533.00</td>
<td>21</td>
<td>2</td>
<td>9.5%</td>
<td>80.5%</td>
</tr>
<tr>
<td>5540.01</td>
<td>24</td>
<td>2</td>
<td>8.3%</td>
<td>72.3%</td>
</tr>
<tr>
<td>5544.06</td>
<td>37</td>
<td>3</td>
<td>8.1%</td>
<td>66.0%</td>
</tr>
<tr>
<td>5544.05</td>
<td>32</td>
<td>2</td>
<td>6.3%</td>
<td>81.0%</td>
</tr>
<tr>
<td>5541.03</td>
<td>18</td>
<td>1</td>
<td>5.6%</td>
<td>88.1%</td>
</tr>
<tr>
<td>5542.01</td>
<td>20</td>
<td>1</td>
<td>5.0%</td>
<td>86.2%</td>
</tr>
<tr>
<td>5541.04</td>
<td>2</td>
<td>0</td>
<td>0.0%</td>
<td>88.8%</td>
</tr>
<tr>
<td>5541.05</td>
<td>6</td>
<td>0</td>
<td>0.0%</td>
<td>83.7%</td>
</tr>
<tr>
<td>5542.03</td>
<td>10</td>
<td>0</td>
<td>0.0%</td>
<td>77.6%</td>
</tr>
<tr>
<td>Total</td>
<td>313</td>
<td>33</td>
<td>10.5%</td>
<td>83.6%</td>
</tr>
</tbody>
</table>


The last column in Table VI-9 lists the census tract’s percentage of the population that identifies with a minority group. The percentages ranged from 66.0% to 94.4%. The highest loan denial rates occur in census tracts with 90% or more of the population belonging to a minority group. However, loans in these tracts could have been denied for reasons not associated with the population characteristics of the neighborhood or the age of its housing stock. Additionally, only 41 loan applications were made in the four neighborhoods with the highest denial rates, a number that probably is too small from which to make firm conclusions.

VI-19
3. Conclusions and Recommendations

The 2018 lending patterns do not provide evidence that discriminatory practices occurred because of 1) race and ethnicity or 2) because of the minority population characteristics and age of the housing stock in certain neighborhoods.

Some income groups experienced high loan denial rates. However, the loan denial rates probably were not the result of bias but because of a poor credit history and excessive debt to income ratios. Many of these borrowers should not apply for a loan until after they have their debts under control.

No impediment was determined regarding discriminatory lending practices. The City’s goal, however, is to improve the loan approval rates of all households, regardless of racial and ethnic identity, that want to buy a home located in Bellflower. Accordingly, the following action will be taken to affirmatively further fair housing:

Action 1: Provide Information to Assist First-Time Homebuyers

The City will encourage the FHF to provide, during their Consumer Fair Housing Workshops, information that assists first time homebuyers improve their knowledge of the home search and home buying process.

H. HOMEOWNER'S INSURANCE

1. Background - Discriminatory Homeowner’s Insurance Practices

On February 15, 2013, HUD issued a final rule regarding Implementation of the Fair Housing Act’s Discriminatory Effects Standard. Under the final rule, a —

Discriminatory effect occurs where a facially neutral housing practice actually or predictably results in a discriminatory effect on a group of persons (that is, disparate impact), or on the community as a whole (perpetuation of segregation).

An example of a housing policy or practice that may have a disparate impact on a protected class is the provision and pricing of homeowner’s insurance. The final rule states:

HUD has long interpreted the Fair Housing Act to prohibit discriminatory practices in connection with homeowners insurance.

HUD referred interested parties to:

24 CFR 100.70 (d)(4) [March 15, 1989][defining –other prohibited sale and rental conduct] to include refusing to provide …property or hazard insurance for dwellings or providing such … insurance differently because of a protected class.

Source: Federal Register, Vol. 78, No. 32/Friday 15, 2013, page 11475
2. Analysis of Homeowners and Renters Insurance

According to the California Association of REALTORS:

Given the increased difficulty of obtaining affordable homeowners' insurance in recent years, buyers should obtain quotes as early as possible in the home buying process. In the process of obtaining insurance, the insurance agent or underwriter will most likely be checking the insurance database, as a matter of course, without charge. Buyers should seek insurance quotes during the inspection period so that there will be clear understanding of the cost of the insurance early in the transaction, and so that buyers will have an opportunity to evaluate this fact during the inspection period.

The Community Service Statement under Title 10 of the California Code of Regulations (CCR) Section 2646.6, has the purpose of addressing the issue of availability of insurance in "underserved" communities and of promoting anti-discrimination so that all have equal access to insurance in California. The California Department of Insurance (DOI) collects and analyzes data from home, personal auto, commercial multiple peril and commercial fire insurers in California for all ZIP codes, and reports on those that are considered as "underserved".

Although the DOI periodically identifies underserved communities, the information is not helpful in regard to homeowners insurance. Besides poverty and minority population, the key factor in the identification of underserved communities is a disproportionate number of uninsured motorists. The Bellflower zip code is not underserved. In the Gateway Cities Region underserved zip codes include:

- 90723 Paramount
- 90262 Lynwood
- 90716 Hawaiian Gardens

Renters insurance, also called an HO-4 in the insurance industry, is similar to a homeowners insurance policy. It provides two primary protections: the renters own belongings in case of fire, theft or damage, and liability coverage for damage caused by the tenant's own negligence or accident. The coverage is purchased by the renter and renter is the person insured. Renters insurance is relatively inexpensive, according to the 2019 California Renters Insurance Guide.


As previously noted, HUD annually counts discriminatory practices in categories known as -issues. In the five fiscal years between 2013 and 2017, 41,674 issues were counted of which 15 involved refusing to provide insurance.

3. Conclusions and Recommendations

The available data cannot demonstrate if the availability and cost of homeowners insurance is impediments to fair housing choice.

The City will take the following action to affirmatively further fair housing:
Action 1: Provide Information on Homeowner’s and Renter’s Insurance

- In FY 2020-2021 to FY 2024-2025, the FHF will include a discussion of homeowner’s and renter's insurance in their Consumer Fair Housing Workshops.

I. BLOCKBUSTING/PANIC SELLING

1. Background - Inducing Sales by Misrepresentations

The Federal Fair Housing Act of 1968, as amended, declared it an illegal practice:

...for profit, to induce or attempt to induce sales and rentals by representations regarding the entry or prospective entry into the neighborhood of [a] person or persons of a particular race, color, religion, etc.

Section 10177(l)(1) of the California Business and Professions Code states that the Real Estate Commissioner may revoke or suspend the license of a real estate licensee if he/she has done the following:

Solicited or induced the sale, lease, or listing for sale or lease of residential property on the grounds, wholly or in part, of loss of value, increase in crime, or decline of the quality of the schools due to the present or prospective entry into the neighborhood of a person or persons having a characteristic listed in subdivision (a) or (d) of Section 12955 of the Government Code ....

Government Code Section 12955 lists the characteristics as including race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, or genetic information of that person.

2. Analysis of Blockbusting/Panic Selling

Data on housing discrimination complaints based on the alleged acts of blockbusting and/or panic selling are not routinely collected by the State DFEH or the FHF.

As previously noted, HUD annually counts discriminatory practices in categories known as “issues.” In the five fiscal years between 2013 and 2017, 41,674 issues were counted of which 15 involved blockbusting.

3. Conclusions and Recommendations

There is no evidence that blockbusting/panic selling has occurred in Bellflower. Consequently, it is determined that blockbusting and panic selling are not impediments to fair housing choice. No actions are recommended concerning blockbusting/panic selling.
J. PROPERTY MANAGEMENT PRACTICES

1. Background

a. On-Site Property Management Requirements

The FHA covers most — but not all — housing. Some exemptions to coverage under the FHA include: (a) owner-occupied buildings with no more than four units (which is commonly known as the Mrs. Murphy exemption); (b) single family housing sold or rented without the use of a broker if the private individual owner does not own more than three such single family homes at one time; or (c) housing operated by organizations and private clubs that limit occupancy to members.

(Republican Senator George D. Aiken of Vermont coined the term "Mrs. Murphy" when he reportedly suggested that Congress "integrate the Waldorf and other large hotels, but permit the 'Mrs. Murphy's,' who run small rooming houses all over the country, to rent their rooms to those they choose.")

Under California law, the owners of apartment buildings with 16 or more housing units must provide for on-site property management. More specifically, California Civil Code Title 25, Section 42 requires a manager, janitor, housekeeper, or other responsible person to live on the premises and have charge of every apartment complex that has 16 or more apartment units on the property if the property owner does not live on the premises. Apartment properties between 4 and 15 units must have a notice placed in conspicuous place stating the property owner's name and address or the name and address of the agent in charge of the apartment house if the owner does not reside upon the premises. The Civil Code does not require apartment managers to reside on properties that have 4 or less units.

b. Rental Housing Stock and Renter Householders

Property management policies and practices are of keen importance to Bellflower residents. Approximately 25% of the rental housing stock is located in structures having 16 or more housing units. However, it is possible that structures with fewer units — 4-plexes for example — are located on the same premises and, therefore, could have 16 or more apartments in the complex. It is noteworthy that 40% of the rental housing stock is comprised of single-family homes and would not have on-site property management. Table VI-10 contains data on the renter occupied housing units by structure size.

Table VI-11 shows that Bellflower renters are predominantly younger (<35 years of age). Seniors (>65 years of age) comprise almost 13% of all renter householders.
Table VI-10
City of Bellflower
Renter Occupied Housing Units by Units in Structure

<table>
<thead>
<tr>
<th>Units in Structure</th>
<th>Number of Units</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>1, Detached</td>
<td>4,051</td>
<td>28.3%</td>
</tr>
<tr>
<td>1, Attached</td>
<td>643</td>
<td>4.5%</td>
</tr>
<tr>
<td>2</td>
<td>459</td>
<td>3.2%</td>
</tr>
<tr>
<td>3 or 4</td>
<td>930</td>
<td>6.5%</td>
</tr>
<tr>
<td>5 to 9</td>
<td>1,529</td>
<td>10.7%</td>
</tr>
<tr>
<td>10 -19</td>
<td>1,586</td>
<td>11.1%</td>
</tr>
<tr>
<td>20-49</td>
<td>2,536</td>
<td>17.7%</td>
</tr>
<tr>
<td>50+</td>
<td>1,955</td>
<td>13.7%</td>
</tr>
<tr>
<td>Mobile Homes</td>
<td>594</td>
<td>4.2%</td>
</tr>
<tr>
<td>Boat, RV, Van</td>
<td>12</td>
<td>0.1%</td>
</tr>
<tr>
<td>50+</td>
<td>14,295</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Note: units in structures of 16 units or more include 40% of units located in structures with 10-19 units plus those in structures with 20-49 units and 50+ units.

Source: American Community Survey 2013-2017 5-Years Estimates Table B25032 Tenure by Units in Structure

Table VI-11
City of Bellflower
Renter Occupied Units by Age of Householder

<table>
<thead>
<tr>
<th>Age of Householder</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 35 Years</td>
<td>3,622</td>
<td>25.3%</td>
</tr>
<tr>
<td>35 to 44 Years</td>
<td>3,574</td>
<td>25.0%</td>
</tr>
<tr>
<td>45 to 54 Years</td>
<td>3,181</td>
<td>22.3%</td>
</tr>
<tr>
<td>55 to 64 Years</td>
<td>2,030</td>
<td>14.2%</td>
</tr>
<tr>
<td>65 to 74 Years</td>
<td>1,263</td>
<td>8.8%</td>
</tr>
<tr>
<td>75 to 84 Years</td>
<td>497</td>
<td>3.5%</td>
</tr>
<tr>
<td>85 Years and Over</td>
<td>128</td>
<td>0.9%</td>
</tr>
<tr>
<td>Total</td>
<td>14,295</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: American Community Survey 2013-2017 5-Year Estimates Table S2502 Demographic Characteristics for Occupied Housing Units
2. Analysis - Fair Housing Laws and Rental Housing

The owners and managers of apartment buildings must comply with a variety of fair housing laws such as:

- Service and companion animals
- Reasonable accommodations
- Reasonable physical modifications
- Equal Opportunity Logo, Fair Housing Notice, Equal Opportunity in Housing Statement
- Other property management discriminatory practices

For rent advertising on seven sites was reviewed: Rent.com; Apartments.com; Trulia, craigslist; ApartmentGuide.com, HotPads.com, and ApartmentFinder.com.

a. Service and Companion Animals

Persons with a disability are one of the classes protected from discrimination in housing. Apartments must allow, under certain conditions, -service animalsl and -companion animals. A service animal is one trained to do work or perform tasks for the benefit of a person with a disability. A service animal can be of varying species, breed or size. It might wear specialized equipment such as a backpack, harness, special collar or leash, but this is not a legal requirement. Companion animals, also referred to as assistive or therapeutic animals, can assist individuals with disabilities in their daily living and as with service animals, help disabled persons overcome the limitations of their disabilities and the barriers in their environment. They are typically for individuals with mental disabilities and can assist the person with depression, anxiety or provide emotional support.

Under federal and state fair housing laws, individuals with disabilities may ask their housing provider to make reasonable accommodations in the "no pets" policy to allow for their use of a companion/service animal. The housing provider may ask the disabled applicant/tenant to provide verification of the need for the animal from a qualified professional. Once that need is verified, the housing provider must generally allow the accommodation.

The online ads of the 17 apartment complexes were reviewed to discern pet policies. The results are:

- The ads of 8 complexes stated pets are allowed. Seven ads stated dogs and cats were allowed and one stated cats are allowed
- The ads of five complexes stated pets are not allowed.
- The ads of four complexes did not state whether pets are allowed.

It is assumed that the apartment complexes allowing pets allow service and companion animals, as well.

Some disabled persons are unaware of their fair housing rights and, as a consequence, may not consider as available to them apartments with ads that state –no pets.
b. **Reasonable Accommodations**

HUD and the DOJ state:

The [Fair Housing] Act makes it unlawful to refuse to make reasonable accommodations to rules, policies, practices, or services when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling.

To show that a requested accommodation may be necessary, there must be an identifiable relationship, or nexus, between the requested accommodation and the individual’s disability.

**Example 1:** A housing provider has a policy of providing unassigned parking spaces to residents. A resident with mobility impairment, who is substantially limited in the ability to walk, requests an assigned accessible parking space close to the entrance to her unit as a reasonable accommodation. There are available parking spaces near the entrance to her unit that are accessible, but those spaces are available to all residents on a first come, first served basis. The provider must make an exception to its policy of not providing assigned parking spaces to accommodate this resident.

**Example 2:** A housing provider has a policy of requiring tenants to come to the rental office in person to pay their rent. A tenant has a mental disability that makes her afraid to leave her unit. Because of her disability, she requests that she be permitted to have a friend mail her rent payment to the rental office as a reasonable accommodation. The provider must make an exception to its payment policy to accommodate this tenant.


Data on the failure to permit a reasonable accommodation are maintained neither by the State DFEH nor FHF. HUD headquarters in Washington, DC does publish data on this issue or alleged act. These data show that over the past five years an average 3,000 complaints are made annually because of a failure to permit a reasonable accommodation.

Housing discrimination complaints filed with the HUD-San Francisco office identify the issue or alleged discriminatory act. Two of the 19 Bellflower complainants described the failure to make a reasonable accommodation as among the fair housing issues.

The majority of housing discrimination complaints filed with the FHF had disability as a basis. It is possible that some of those complaints were made because of failure to allow a reasonable accommodation.

c. **Reasonable Physical Modifications**

According to HUD:

A reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full
enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. A request for a reasonable modification may be made at any time during the tenancy. The Act makes it unlawful for a housing provider or homeowners' association to refuse to allow a reasonable modification to the premises when such a modification may be necessary to afford persons with disabilities full enjoyment of the premises. [Emphasis added]


HUD data show that during the past five years an annual average of 190 complaints is made throughout the country because of a failure to permit a reasonable modification. I

Housing discrimination complaints filed with the HUD-San Francisco office identify the issue or alleged discriminatory act. One of the 19 Bellflower complainants described the failure to make a reasonable modification as among the fair housing issues.

d. Equal Opportunity Logo, Fair Housing Notice, Equal Opportunity in Housing Statement

Another property management practice of interest is if the on-site search sites advertise support for fair housing.

Trulia

At the bottom of each ad, Trulia makes available a link to a Fair Housing Guide. The link is to a Landlord Guide to Fair Housing Laws. The Guide is comprehensive and describes what landlords should know about their fair housing obligations to tenants.

At the bottom of each ad, the following statement is made: “Zillow Group is committed to ensuring digital accessibility for individuals with disabilities.”

Digital accessibility is the ability of a website, mobile application or electronic document to be easily navigated and understood by a wide range of users, including those users who have visual, auditory, motor or cognitive disabilities.

Craigslist

Craigslist publishes a Fair Housing Notice. The notice states:

It is illegal to discriminate in the sale, rental or leasing of housing because of a person’s race, color, creed, national origin, sexual orientation, marital status, familial status, or religion. In New York City and in other municipalities in the state, it is also illegal to discriminate against people based on their source of income, including receipt of Section 8 or other public benefits. [Emphasis added]

For apartment seekers wanting to live in Bellflower the reference to New York City would be confusing and not helpful

VI-27
**ApartmentGuide.com**

ApartmentGuide.com publishes the equal housing opportunity logo. Additionally, it references -Accessibility: Rent Path Web Contact Accessibility Guidelines, WCAG 2.0.1 This refers to the fact that RentPath is 1) committed to ensuring accessibility of its website to people with disabilities and 2) taking steps to ensure their sites will adhere to level AA of the Web Content Accessibility Guidelines (WCAG 2.0).

**HotPads.com**

HotPads publishes the fair housing equal housing opportunity logo.

It also makes the statement that the -Zillow Group is committed to ensuring digital accessibility for individuals with disabilities.]

HotPads also provides a link to the Landlord Guide to Fair Housing Laws.

**ApartmentFinder.com**

ApartmentFinder.com publishes the fair housing equal housing opportunity logo.

**Apartments.com**

The search tool at the bottom of each ad publishes an equal opportunity in housing statement. In part, the statement reads:

> Complaints alleging discrimination in housing may be filed with the nearest office of the United States Department of Housing and Urban Development (HUD), or by calling HUD’s toll free number, 1-800-669-9777 (voice), or 1-800-543-8294 (TDD). You can contact HUD on the internet at [http://www.hud.gov](http://www.hud.gov).

> If you believe that you have been the victim of discrimination, you can also contact your state’s Attorney General or a local legal aid organization.

**Rent.com**

The search tool publishes the equal housing opportunity logo.

The accessibility link informs the apartment seeker that RentPath —...is constantly working towards improving the accessibility of its website to ensure it provides equal access to all of our users. Therefore, if you have feedback or concerns related to the accessibility of any content on this website, or have ideas or comments that would help us improve the accessibility and usability of our website, please contact us at accessibilityfeedback@rentpath.com. If you have encountered a specific problem with the site, please include the web address or URL where you experienced difficulty and describe the specific problem(s) you have encountered.]

3. **Conclusions and Recommendations**

Property management practices concerning service and companion animals, reasonable accommodations, and reasonable modifications impede fair housing choice.
The City will take the following action to remove or mitigate this impediment:

**Action 1: Provide Information on Prohibited Property Management Practices at Landlord Workshops**

- In the period from FY 2020/2021 to FY 2024/2025, the Fair Housing Foundation will continue to hold Landlord Workshops and include discussions on the prohibited discriminatory practices pertaining to service and companion animals, reasonable accommodations, and reasonable modifications.

**K. DISCRIMINATORY ADVERTISING**

1. **Background – Prohibitions Against Preferences and Limitations**

Section 804(c) of the 1968 Federal Fair Housing Act, as amended, prohibits discriminatory advertising; it is unlawful:

> To make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.

Section 12955(c) of the California Fair Employment and Housing Act contains similar language prohibiting discriminatory advertising. That Section, however, also includes the State’s additionally protected classes such as, but not limited, to sexual orientation, marital status, ancestry, and source of income.

Guidance on the words and phrases that are or could be interpreted as discriminatory is available from several sources including, but not limited, to:

- Roberta Achtenberg, Assistant Secretary for Fair Housing and Equal Opportunity, HUD. –Guidance Regarding Advertisements under Section 804 (c) of the Fair Housing Act, January 9, 1995

2. **Analysis of Newspaper Print and Online Advertisements**

Newspaper and print advertising is not used as often as it was in the past. According to the California Newspaper Publishers Association (CNPA), apartment owners have lower cost alternatives to print advertising such as Craigslist.

The past decade has been rough for print publishers around the world. As the rise of smartphones accelerated the trend towards online consumption of news and other forms of journalism at the expense of newspapers and magazines, advertisers gradually moved their budgets online as well, forcing many print publications out of existence.
a. Discriminatory Words and Phrases

In January 2020, the Long Beach Press Telegram published two ads for the same senior housing apartment complex located in Bellflower. The ad mentioned that it was age-restricted (55+ years) and described the number of bedrooms and baths, monthly rents, and other physical features of the property. The ad contained no discriminatory words or phrases.

Apartment advertising on seven sites was reviewed: Rent.com; Apartments.com; Trulia, craigslist; ApartmentGuide.com, HotPads.com, and ApartmentFinder.com.

All of the ads described physical features such as the number of bedrooms and baths, square footage, lease period, whether pets were allowed, and the apartment name and address. All the ads except for one did not contain words or phrases that violated the fair housing act.

One Craigslist ad stated: -Sorry we don’t participate in Section 8 program.‖

Source of income discrimination is against the law in California. Until the passage of SB 329 in 2019, -source of income‖ did not include Section 8 rental assistance. SB 329 changed that as follows:

-Source of income‖ means lawful, verifiable income paid directly to a tenant or to a representative of a tenant, or paid to a housing owner or landlord on behalf of a tenant, including federal, state, or local public assistance, and federal, state, or local housing subsidies, including, but not limited to, federal housing assistance vouchers issued under Section 8 of the United States Housing Act of 1937 (42 U.S.C. Sec. 1437f). For the purposes of this definition, a housing owner or landlord is not considered a representative of a tenant.

This bill also prohibits ads stating -No Section 8.‖

According to Kimball, Tirey & St. John:

The passage of SB 329 and SB 222 means that California residential landlords throughout the state will no longer be able to say they don't participate in the Section 8, VASH or other rental assistance programs. It is anticipated that tenant's rights groups will be conducting testing to see whether landlords are aware of and are complying with the law. Although the changes do not go into effect until January 1, 2020, landlords who don't currently participate in rental assistance programs are advised to respond to inquiries about whether they accept Section 8, VASH or other rental assistance that although they do not currently participate, they will be participating effective January 1, 2020.

The FEHA states that it is unlawful to make, print or publish or cause to made, printed or published, any notice, statement or advertisement with respect to the sale or rental of a housing accommodation that indicates any preference, limitation, or discrimination based on any enumerated protected class, including source of income. Accordingly, it is important that all advertising (including ads posted on third party websites such as Craigslist) be revised to remove any references such as -No Section 8‖ or -We do not participate in Section 8‖ before January 1, 2020.
The California Apartment Association (CAA) continues to support voluntary acceptance of Section 8 but opposed SB 329 over concerns it would removes an owner’s ability to choose whether to take vouchers.

CAA has concerns that landlords, who reject Section 8 applicants, even after giving them fair consideration, will face legal challenges. Litigation may become particularly likely if the rejected voucher holder is the only applicant for a unit.

b. Advertising on Facebook

HUD has sued Facebook, alleging that Facebook violated the Fair Housing Act by encouraging, enabling, and causing housing discrimination through the company’s advertising platform.

In a separate case, Housing Rights Initiative (HRI) and a class of potential renters filed a lawsuit against seven property management firms, alleging age discrimination in advertising in the Washington, D.C. metro area. This is the first fair housing complaint against rental housing owners and operators, challenging their advertising practices on Facebook. The lawsuit claims the advertising platform allows the property management firms to choose their target audiences by selecting from pre-populated lists of user interests and demographics. This feature prevents advertisements from reaching audiences (e.g., elderly renters) outside of those parameters.

Facebook’s pre-populated lists allows advertisers to exclude audiences from their target list on the basis of interest categories that are proxies for federally protected classes (race, color, religion, national origin, sex, familial status, and disability) such as: -Interest in Disabled Parking Permit,l interest in Telemundo,l -English as a second language,l -parents with teenagers,l -soccer moms, or -moms with preschool kinds.

Source: Apartment Management Magazine, -Numerous Leading Housing Companies Charged with Discriminating Against Older Americans in Advertising Apartments on Facebook,l January 2020, page 6

c. Housing Discrimination Complaints

HUD reported that two complaints filed by Bellflower residents mentioned discriminatory advertising.

d. Flagging Discriminatory Housing Posts

Craigslist provides the following information to its posters:

-When making any post on craigslist, you must comply with Section 3604(c) of the Fair Housing Act. This law generally prohibits stating, in any notice or ad for the sale or rental of dwelling, a discriminatory preference based on any protected categories.

-If you encounter a housing posting on craigslist that you believe violates Fair Housing laws, please flag the posting as -prohibited. In addition to penalties that
may be applied by regulatory agencies, attempts to post discriminatory ads maybe blocked and/or subjected to other remedial measures. Among the craigslist FAQs are -Recognizing a discriminatory posting‖ and -What should I do if I find a discriminatory posting?‖

3. Conclusions and Recommendations

The newspaper print ads reviewed did not contain discriminatory terms or phrases. The review of online advertising revealed only one ad that violated fair housing laws. Thus, the one incident of discriminatory advertising does not merit the conclusion that advertising practices create an impediment to fair housing choice.

M. HATE CRIMES

1. Background – Hate Crimes at a Residential Location

According to HUD, the AI should analyze housing related hate crimes; that is; where an event takes place at a residence, home or driveway. When hate crimes occur at a home, the victims can feel unwelcomed and threatened. The victims may feel that they have no recourse other than to move from the home and neighborhood of their choice. Hate crime means –

   -a criminal act committed, in whole or in part, because of one or more of the following actual or perceived characteristics of the victim: (1) disability, (2) gender, (3) nationality, (4) race or ethnicity, (5) religion, (6) sexual orientation, (7) association with a person or group with one or more of these actual or perceived characteristics.‖ [Source: California Penal Code section 422.55]

2. Analysis of Hate Crime Data

According to the California Department of Justice (DOJ), hate crimes are not separate distinct crimes but rather traditional offenses motivated by the offender's bias. A bias is –

   A preformed negative opinion or attitude toward a group of persons based on their race, ethnicity, national origin, religion, gender, sexual orientation and/or physical/mental disability.

When a hate crime occurs it is referred to as an event. In the California Attorney General's report, the information about the event is a crime report or source document that meets the criteria for a hate crime. There may be one or more suspects involved, one or more victims targeted, and one or more offenses involved for each event.

The Attorney General’s office also compiles data on the location of a hate crime event. During the 2010-2018 period, 27.3% of all hate crime events happened at a -residence, home or driveway.‖ From a fair housing perspective, HUD advises cities to estimate the number of hate crime events that occurred at a residence.

Table VI-12 shows that in the nine-year period between 2010 and 2018, seven hate crime events occurred in Bellflower. Based on the statewide percentage of 27.3% it is estimated that two of the seven hate crime events occurred at a residence, home or driveway.
3. Conclusions and Recommendations

Based on past trends, it is projected that one or two hate crime events may occur during the period of FY 2020/22 to FY 2024/2025. This low number does not demonstrate that an impediment to fair housing choice exists at this time.

In FY 2020-2021 to FY 2024-2025, the City staff will review the California Department of Justice annual hate crime reports to ascertain if an action should be taken because of an increase in hate crime events. If an action is needed, it will be included in the Consolidated Plan Annual Action Plan.
SECTION VII
PUBLIC SECTOR IMPEDIMENT ANALYSIS
A. INTRODUCTION

HUD’s Fair Housing Planning Guide explains that among the information needed to conduct an AI is data on:

- Public policies, practices, and procedures involving housing and housing-related activities
- Zoning and land use policies

The United States Department of Justice (DOJ) has indicated that a major focus of its efforts is on public sector impediments that may restrict housing opportunities for disabled persons, including:

- Insuring that zoning and other regulations concerning land use are not employed to hinder the residential choices of these individuals, including unnecessarily restricting communal, or congregate, residential arrangements, such as group homes.
- Insuring that newly constructed multifamily housing is built in accordance with the Fair Housing Act’s accessibility requirements so that it is accessible to and usable by people with disabilities, and, in particular, those who use wheelchairs.

Source: United States Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, The Fair Housing Act, July 25, 2008, page 4

California’s Fair Employment and Housing Act states that it is unlawful:

- To discriminate against protected classes through public or private land use practices, decisions, and authorizations.
- Discrimination includes, but is not limited to, restrictive covenants, zoning laws, denial of use permits, and other actions authorized under the Planning and Zoning Law
  [Emphasis added]

B. SURVEY OF LAND USE AND ZONING REGULATIONS, PRACTICES AND PROCEDURES

The HUD-LA Field Office has approved using a Survey to identify public sector fair housing impediments. It is referred to as a Survey of Planning Policies and Practices, Zoning Regulations and Building Code Standards That May Pose an Impediment to Fair Housing Choice. The analysis focuses on the questions most relevant to the City which include the following:

- Family Definition
- Disability Definition
- Definition of Boarding or Rooming House or Hotel
- Group Homes
- Transitional and Supportive Housing
- Reasonable Accommodation Procedure
- Occupancy Standards
1. Family Definition

Survey Question: Does the Zoning Ordinance definition of “family” have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement?

a. Background

Many zoning ordinances define “family” as 1) “An individual, or two (2) or more persons related by blood, marriage, or legal adoption living together as a single housekeeping unit in a dwelling unit and 2) A group not to exceed five (5) persons, excluding servants, living together as a single housekeeping unit in a dwelling unit.”

This definition establishes no occupancy limit if the persons residing in a dwelling are related. But if the persons occupying a dwelling are unrelated, then the zoning regulations impose a maximum occupancy limit of five persons.

Under the foregoing definition, a group home for six disabled persons that functions like a family would be excluded from occupying a single family dwelling in an R1 zone because they are unrelated by blood, marriage or adoption.

To comply with fair housing laws, a definition of “family” must emphasize the functioning of the members as a cohesive household:

- A definition should not distinguish between related and unrelated persons.
- A definition should not impose numerical limitations on the number of persons that may constitute a family.


b. Zoning Ordinance Regulations

The Bellflower Zoning Ordinance defines a family as follows:

“Family” shall mean an individual, or two or more persons, whether or not related by blood, marriage, or adoption, but living together as a single bona fide *housekeeping unit*. Family does not include larger institutional group living situations such as dormitories, fraternities, sororities, monasteries, convents, or military barracks, nor does it include such commercial group living arrangements as boardinghouses, lodging houses, and the like. [Emphasis added]

The Zoning Ordinance defines housekeeping unit as follows:

“Housekeeping unit” shall mean a single person occupying a dwelling unit, or a group of persons occupying a dwelling unit if the members thereof, whether related or unrelated, function as the equivalent of a family, being a non-transient, interactive group jointly occupying the dwelling unit, including the joint use of common areas, and sharing household activities and responsibilities such as meals, chores and expenses. Notwithstanding the foregoing, any group of persons required to be considered as a

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“family” for zoning purposes pursuant to California Health and Safety Code Sections 1267.8, 1566.3, 1568.0831, 1569.85, 11834.23, or any other State law shall be deemed to be a housekeeping unit. Any references in this title to a family occupying a dwelling unit shall be deemed to be to the housekeeping unit occupying such unit. [Emphasis added]

c. Conclusions and Recommendations

The Zoning Ordinance family definition neither restricts the members to related persons nor sets forth a maximum number of persons who can comprise a family. The definition mentions a group of individuals living together as a single housekeeping unit and the Zoning Ordinance includes a single housekeeping unit definition. Therefore, the definition is consistent with fair housing laws and no impediment to fair housing is created by the zoning regulations.

2. Survey Question: Does the Zoning Ordinance or any policy document define “disability”, if at all; at least as broadly as the Fair Housing Act?

a. Background

The Fair Housing Act prohibits discrimination on the basis of handicap. “Handicap” has the same legal meaning as the term “disability.” Federal laws define a person with a disability as:

Any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment. [Emphasis added]

The term “physical or mental impairments” may include conditions such as blindness, hearing impairment, mobility impairment, HIV infections, AIDS, AIDS Related Complex, mental retardation, chronic alcoholism, drug addiction, chronic fatigue, learning disability, head injury, and mental illness.

The term “major life activities” may include walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself.

b. Zoning Ordinance Regulations

Chapter 17.42 of the Zoning Ordinance establishes a “Reasonable Accommodation for Persons with Disabilities” and includes the following disability definition:

A person with a disability is a person who has a physical or mental impairment that limits or substantially limits one (1) or more major life activities, anyone who is regarded as having such impairment or anyone who has a record of such impairment. This chapter applies only to those persons who are defined as disabled under the Acts. (Ord. 1253 § 3, 10/14/13)

Definitions of mental disability and physical disability are found in Government Code Section 12926 (j) mental disability and (m) physical disability. Government Code Section 12926 (n) explains that –

Notwithstanding subdivisions (j) and (m), if the definition of “disability” used in the federal Americans with Disabilities Act of 1990 (Public Law 101-336) would result in
broader protection of the civil rights of individuals with a mental disability or physical
disability, as defined in subdivision (j) or (m), or would include any medical condition
not included within those definitions, then that broader protection or coverage shall be
deemed incorporated by reference into, and shall prevail over conflicting provisions of, the
definitions in subdivisions (j) and (m).

In Government Code 12926.1, the Legislature finds and declares as follows:

(a) The law of this state in the area of disabilities provides protections independent from those
in the federal Americans with Disabilities Act of 1990 (P.L. 101-336). Although the federal act
provides a floor of protection, this state’s law has always, even prior to passage of the federal
act, afforded additional protections.
(b) The law of this state contains broad definitions of physical disability, mental disability, and
medical condition. It is the intent of the Legislature that the definitions of physical disability and
mental disability be construed so that applicants and employees are protected from
discrimination due to an actual or perceived physical or mental impairment that is disabling,
potentially disabling, or perceived as disabling or potentially disabling.
(c) Physical and mental disabilities include, but are not limited to, chronic or episodic conditions
such as HIV/AIDS, hepatitis, epilepsy, seizure disorder, diabetes, clinical depression, bipolar
disorder, multiple sclerosis, and heart disease. In addition, the Legislature has determined that
the definitions of “physical disability” and “mental disability” under the law of this state
require a “limitation” upon a major life activity, but do not require, as does the federal Americans
with Disabilities Act of 1990, a “substantial limitation.” This distinction is intended to result in
broader coverage under the law of this state than under that federal act. Under the law of this
state, whether a condition limits a major life activity shall be determined without respect to any
mitigating measures, unless the mitigating measure itself limits a major life activity, regardless of
federal law under the Americans with Disabilities Act of 1990. Further, under the law of this state,
“working” is a major life activity, regardless of whether the actual or perceived working limitation
implicates a particular employment or a class or broad range of employments. [Emphasis added]

c. Conclusions and Recommendations

The Zoning Ordinance disability definition meets the intent of federal and state fair housing
laws in almost all respects. However, to eliminate what can be termed an administrative rather
than actual impediment to fair housing choice, the City will take the following action:

Action 1: Delete the Reference to “substantially limits” in the Disability Definition

As mentioned above, the California Legislature has determined that the definitions of “physical
disability” and “mental disability” under the law of this state require a “limitation” upon a major
life activity, but do not require, as does the federal Americans with Disabilities Act of 1990, a
“substantial limitation.”

The disability definition will be amended to delete reference to “substantially limits.” The
amendment also will include a reference to how the State law, which provides broader protections
than the federal law, defines disability.
3. **Survey Question:** Does the Zoning Ordinance restrict housing opportunities for individuals with disabilities and mischaracterize such housing as “boarding or rooming house” or “hotel”?

   a. **Background**

   State law requires that licensed residential care facilities not be defined within the meaning of boarding house, rooming house, institution or home for the care of minors, the aged, or the mentally infirm, foster care home, guest home, rest home, sanitarium, mental hygiene home, or other similar term which implies that a residential facility is a *business run for profit.* [Emphasis added]

   b. **Zoning Ordinance Definition**

   The Zoning Ordinance contains the following definitions:

   “Boarding house” shall mean a dwelling where non-transient lodging, with or without meals, is provided for compensation to one (1) or more persons who are not members of the housekeeping unit occupying the premises. For purposes of this definition, lodging shall be deemed non-transient if it is for not less than thirty-one (31) consecutive days. Notwithstanding the foregoing, **the following shall not be deemed a boarding house** when the dwelling is used to serve six (6) or fewer persons and the occupant or owner of the dwelling has all licenses required by law for such service: an intermediate care facility/developmentally disabled habilitative or an intermediate care facility/developmentally disabled-nursing, as defined in California Health and Safety Code Section 1250; a residential facility as defined in California Health and Safety Code Section 1502; a residential care facility as defined in California Health and Safety Code Section 1568.01; a residential care facility for the elderly as defined in California Health and Safety Code Section 1569.2; an alcoholism or drug abuse recovery or treatment facility as defined in California Health and Safety Code Section 11834.11; or any other use which State law states may not be deemed to be a boarding house. [Emphasis added]

   “Hotel” shall mean any building containing any room or suites of rooms which is designed to be utilized for lodging purposes on a temporary basis. “Hotel” also shall mean any building in which any room or suite of rooms contained therein is rented for temporary lodging purposes to a person to whom is granted only a right of use of such premises and the building owner or operator retains the direct control and supervision of and right of access to such premises. Notwithstanding the foregoing, living accommodations provided at any governmental or nonprofit institution in connection with the functions of such institution shall not be deemed to be a hotel.

   c. **Conclusions and Recommendations**

   The Zoning Ordinance defines “boarding house” and “hotel” consistent with State law. Licensed group homes housing six or fewer disabled persons are not included within the meaning of either term. Therefore, the City’s definition complies with the federal and the state fair housing laws.
4. Survey Question: Group Homes - Does the Zoning Ordinance allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled?

a. Background

The joint statement by DOJ and HUD describes this issue as follows:

A local government may generally restrict the ability of groups of unrelated persons to live together as long as the restrictions are imposed on all such groups. Thus, in the case where a family is defined to include up to six unrelated people, an ordinance would not, on its face, violate the Act if a group home of seven unrelated people with disabilities was not allowed to locate in single-family zoned neighborhood, because a group of seven unrelated people without disabilities would also not be allowed. [Emphasis added]

Under California law, licensed group homes occupied by six or fewer disabled persons must be permitted in all zones that permit single-family homes. State law -- as the summary below explains -- allows cities to require a conditional use permit for residential care facilities for seven or more persons.

Because California law only protects facilities serving six or fewer residents, many cities and counties restrict the location of facilities housing seven or more clients. They may do this by requiring use permits, adopting special parking and other standards for these homes, or prohibiting these large facilities outright in certain zoning districts. While this practice may raise fair housing issues, no published California decision prohibits the practice, and analyses of recent State legislation appear to assume that localities can restrict facilities with seven or more clients. Some cases in other federal circuits have found that requiring a conditional use permit for large group homes violates the federal Fair Housing Act. However, the federal Ninth Circuit, whose decisions are binding in California, found that requiring a conditional use permit for a building atypical in size and bulk for a single-family residence does not violate the Fair Housing Act. [Emphasis added]


b. Zoning Ordinance Regulations

The Zoning Ordinance family definition does not establish a limit on the number of persons who comprise a family. In addition, the Zoning Ordinance considers licensed group homes housing six or fewer disabled persons a residential use of property. These zoning provisions are consistent with state fair housing laws.

Community care facilities housing six or fewer persons are a permitted use in all residential zones. The Zoning Ordinance defines community care facilities as follows:

“Community care facility” (Health and Safety Code Section 1502) shall mean any facility, place or building that is maintained and operated to provide nonmedical residential care, day treatment, adult day care, or foster family agency services for children and adults, including, but not limited to, the physically handicapped, mentally impaired,
incompetent person, and abused or neglected children and includes the following: Residential facility, adult day care facility, therapeutic day services facility, foster family agency, foster family home, small family home, social rehabilitation facility, community treatment facility and full-service adoption agency, transitional shelter care facility.

c. Conclusions and Recommendations

Group homes housing six or fewer persons and licensed by the State under the provisions of the Health and Safety Code are permitted in all residential zones allowing single-family homes. Therefore, the City's zoning regulations are consistent with federal and state fair housing laws.

Under the provisions of California law, a city may require a conditional use permit (CUP) for group housing occupied by seven or more disabled persons.

5. Survey Question: Transitional and Supportive Housing - Does the Zoning Ordinance or other planning policy document address housing for “special needs” populations?

a. Background

Special needs populations means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or developmental disabilities, and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people.

To the extent that zoning and other planning policy documents fail to provide for, or impose barriers to, these types of housing an impediment to fair housing choice exists.

1. Planning and Zoning Requirements

Government Code Section 65583(c)(3) states:

Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Supportive housing, as defined in Section 65650, shall be a use by right in all zones where multifamily and mixed uses are permitted, as provided in Article 11 (commencing with Section 65650).

HCD has stated that local zoning must set forth provisions that –

…transitional housing and supportive housing are permitted as a residential use and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone (Government Code Section 65583(a)(5)). In other words, transitional housing and supportive housing are permitted in all zones allowing residential uses and are not subject to any restrictions (e.g. occupancy limit) not imposed on similar dwellings (e.g. single-family homes, apartments) in the same zone in which the transitional housing and supportive housing is located. For example, transitional housing located in an apartment building in a multifamily zone is permitted in the same manner as an apartment building in the same zone and supportive housing located in a
single-family home in a single-family zone is permitted in the same manner as a single-family home in the same zone.

Source: State Department of Housing and Community Development, Memorandum, Senate Bill 2 – Legislation Effective January 1, 2008: Local Planning and Approval for Emergency Shelters and Transitional and Supportive Housing, May 7, 2008 Updated April 10, 2013, page 14

2. Definitions

SB 2 – legislation which took effect on January 1, 2008 – establishes planning and zoning requirements for transitional and supportive housing. SB 745, which took effect on January 1, 2014, generally amends Section 65582 of the Government Code to replace prior Health and Safety Code definitions of "supportive housing," "target population," and "transitional housing" with definitions now more specific to housing element law. Previously, definitions of these terms were found in the Health and Safety Code. AB 1403, which took effect on January 1, 2016, added a definition of “supportive services.”

Government Code Section 65582 defines supportive housing, supportive services, and transitional housing as follows:

(g) “Supportive housing” means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community.

(h) “Supportive services” include, but are not limited to, a combination of subsidized, permanent housing, intensive case management, medical and mental health care, substance abuse treatment, employment services, and benefits advocacy.

(j) “Transitional housing” means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance.

The Public Counsel has advised the following:

…to comply with state law, jurisdictions should specifically adopt the SB 2 definitions of transitional and supportive housing into their Zoning Ordinances. They should also include an affirmative statement following each definition that such use “may be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.”

Public Counsel Community Development Project, Local Zoning Best Practices for Shelter and Transitional and Supportive Housing – An SB 2 (2007) Primer, October 2017, pages 13 and 14 [Public Counsel is a not-for-profit law firm]

Although the Zoning Ordinance contains definitions are consistent with state law, the affirmative statement recommended by the Public Counsel is not included in the two definitions.
3. **Permitted Uses**

The Public Counsel also recommends that:

...jurisdictions should explicitly include supportive and transitional housing as permitted
uses in all residential zones, subject only to the development standards applicable to
residential uses of the same type in the same zone. To avoid any internal conflicts with
the Zoning Ordinance, the jurisdiction should also update any applicable tables of
permitted uses to mark supportive and transitional housing as permitted uses.

According to the Zoning Ordinance, transitional and supportive housing are permitted uses in
all residential zones:

- A-E Zone Agricultural Estate Zone
- SF Single Family Zone
- R-1 Low Density Residential Zone
- R-2 Medium Density Zone
- R-3 Multiple Residential Zone

The BAMU – Bellflower Mixed Use Overlay Zone permits single family and multiple family uses
but does not list transitional or supportive housing as permitted uses. However, state law as
described earlier requires transitional housing and supportive housing to be permitted in all zones
allowing residential uses.

The Public Counsel also advises cities that if residential development is permitted in mixed-use
zones, the jurisdiction should make explicit that transitional and supportive housing are permitted
in those zones, and that such uses will be processed and treated equally to applications
for other permitted residential development.

Additionally, Government Code Section 65651(a) states:

Supportive housing shall be a use by right in zones where multifamily and mixed uses are
permitted, including nonresidential zones permitting multifamily uses…

However, to be judged a use by right the supportive housing development must satisfy
affordability and other requirements.

4. **Use Restrictions**

Although transitional and supportive housing are permitted uses in residential zones, they are
subject to the requirements of Section 17.16.180 of the Zoning Ordinance. According to this Section,
“transitional and supportive housing” are subject to –

- Minimum (150 Square feet) and maximum (400 square feet) housing unit sizes
- An occupancy standard of a maximum of 2 persons
- A separation requirement of 500 feet from other transitional and supportive housing
developments
- Subject to an application process and approval of the Planning Director

These restrictions are inconsistent with the State law which HCD has stated that transitional
and supportive housing are *not subject to any restrictions (e.g. occupancy limit) not imposed*
on similar dwellings (e.g. single-family homes, apartments) in the same zone in which the
transitional housing and supportive housing is located.

More specifically, the Public Counsel has offered the following insights:

Jurisdictions must still ensure that in practice, supportive and transitional housing
developments are not subject to greater restrictions when compared to other residential
uses of the same type in the same zone during the approvals process. For example, if a
provider uses an existing duplex for transitional or supportive housing, then that project is
subject only to development standards applied to any other duplex in that zone, and would
not need separate approval for a change in use. Likewise, if a developer chooses to build
transitional or supportive housing apartments, then standards for multi-family apartment
buildings in that zone will apply. And while transitional and supportive housing are
typically multi-family housing, they can also be single family residences.

c. Conclusions and Recommendations

The Zoning Ordinance requirements pertaining to transitional housing and supportive housing for
the most part meet the intent of state law. However, to eliminate what is termed an administrative,
rather than actual, impediment to fair housing choice the City will take the following action:

Action 1: Amend the Transitional and Supportive Housing Zoning Requirements

- Add the affirmative statement that transitional and supportive housing “may be subject
  only to those restrictions that apply to other residential dwellings of the same type in the
  same zone.”
- Include transitional and supportive housing as permitted uses in the BAMU –
  Bellflower Mixed Use Overlay Zone
- Eliminate the requirements of Section 17.16.180 as they apply to transitional and
  supportive housing
- Incorporate the requirements of AB 2162 in the Zoning Ordinance

6. Survey Question: Does the City have, either by ordinance or policy, a process
by which persons with disabilities can request reasonable accommodations
(modifications or exceptions) to adopted ordinances and to rules, policies,
practices, or services, necessary to afford persons with disabilities an equal
opportunity to use or enjoy a dwelling?

a. Background

A joint statement by DOJ and HUD explains this issue as follows:

As a general rule, the Fair Housing Act makes it unlawful to refuse to make “reasonable
accommodations” (modifications or exceptions) to rules, policies, practices, or services,
when such accommodations may be necessary to afford persons with disabilities an
equal opportunity to use or enjoy a dwelling.

Where a local Zoning Ordinance specifies procedures for seeking a departure from the
general rule, courts have decided, and the DOJ and HUD agree, that these procedures
must ordinarily be followed. If no procedure is specified, persons with disabilities may,
nevertheless, request a reasonable accommodation in some other way, and a local
government is obligated to grant it if it meets the criteria discussed above. A local
government’s failure to respond to a request for reasonable accommodation or an
inordinate delay in responding could also violate the Act.

Local governments are encouraged to provide mechanisms for requesting reasonable
accommodations that operate promptly and efficiently, without imposing significant
costs or delays. The local government should also make efforts to insure that the
availability of such mechanisms is well known within the community.

Joint Statement of the Department of Justice and the Department of Housing and Urban
Development, Group Homes, Local Land Use, and the Fair Housing Act, August 18,

The California Department of Housing and Community Development requires cities and
counties to describe their reasonable accommodation procedure in draft and final housing
elements. Jurisdictions without an adopted procedure must include a program to prepare and
adopt a policy or ordinance. According to HCD a reasonable accommodation procedure must
“...ensure information is available for people who wish to request a reasonable accommodation
with respect to zoning, permit processing, or building laws.”

b. Zoning Ordinance Regulations

regarding Reasonable Accommodation Related to Existing Conditions” were added on
September 26, 2016.

Based on information obtained from Disability Rights California, the City should consider revising
the Reasonable Accommodation Procedure as follows:

**Disability Definition:** The City should use the California state law definition of disability, which
is broader than the federal definition. The HUD-LA Field Office also recommends that cities
should use the State rather than federal definition.

**Processing Fee:** The City should consider eliminating the “appropriate fee” as an application
requirement. “Charging a fee for a reasonable accommodation request, “according to Disability
Rights California, “is unlawful under Title II of the ADA, Section 504 of the Rehabilitation Act of
1973, as well as the California Unruh Civil Rights Act.”

**Public Hearing:** The public notice and public hearing before the Planning Commission present
confidentiality concerns. These concerns pertain to revealing the address and person requesting
the accommodation at a public hearing or notice.

Source: Disability Rights California, *Creating a Reasonable Accommodation Ordinance that
Protects People with Disabilities*, August 10, 2015, 6 pages

As noted above, the HUD-DOJ statement recommends that:

The local government should also make efforts to insure that the availability of such
mechanisms is well known within the community.
Both HUD and HCD recommend that local jurisdictions make the community aware of the reasonable accommodation procedure. Moreover, HCD in their reviews of draft housing recommends that local jurisdictions promote the procedure. According to Bellflower’s 2013-2021 Housing Element, Program 19 commits the City to “Provide information in public places regarding the City’s reasonable accommodation ordinance and Housing Rehabilitation Programs.”

c. Conclusions and Recommendations

As described above, some of the requirements of the Reasonable Accommodation Procedure need to be revised to eliminate the potential for creating an impediment to fair housing choice. The City will take the following actions:

**Action 1: Amend the Reasonable Accommodation Procedure**

The City will amend the Reasonable Accommodation Procedure to update the disability definition, eliminate the fee requirement, and remove the public notice and public hearing requirements. In this endeavor, the City will request input from the Fair Housing Foundation.

The Reasonable Accommodation Procedure will be updated by October 2021, which is the due date for adoption of the 2021-2029 Housing Element.

**Action 2: Increase Marketing Efforts of the City’s Home Improvement Programs**

The City will increase its marketing efforts to target low/moderate-income households, special needs populations and minorities. Additional outreach efforts will be made to the disabled population who could benefit from accommodation improvements to their homes. Marketing efforts include providing materials in English and Spanish at City counters, on the City’s website, and sending materials directly to residents who may be eligible.

7. Survey Question: Does the Zoning Ordinance or Building Code establish occupancy standards or maximum occupancy limits that are more restrictive than state law, which incorporates the Uniform Housing Code (UHC)?

a. Background

Occupancy standards sometimes can impede housing choice for families with children or for disabled persons. For example, some jurisdiction’s zoning regulations have attempted to limit occupancy to five related persons occupying a single family home, or to strictly establish an occupancy standard of no more than two persons per bedroom. Such regulations can limit housing availability for some families with children, or prevent the development of housing for disabled persons.

The federal Fair Housing Act (FHA) also provides that nothing in the Act “limits the applicability of any reasonable local, State or Federal restrictions regarding the maximum number of occupants permitted to occupy a dwelling.” [Section 807(b)(1)]
HUD implements section 589 of the Quality Housing and Work Responsibility Act (QHWRA) of 1988 by adopting as its policy on occupancy standards for purposes of enforcement actions under the Fair Housing Act, the standards provided in the Memorandum of General Counsel Frank Keating to Regional Counsel dated March 20, 1991. The purpose of that Memorandum was “to articulate more fully the Department’s position on reasonable occupancy policies and to describe the approach that the Department takes on its review of occupancy cases.” The Memorandum states the following:

Specifically, the Department believes that an occupancy policy of two persons in a bedroom, as a general rule, is reasonable under the Fair Housing Act. [...] However, the reasonableness of any occupancy policy is rebuttable, and neither the February 21 [1991] memorandum nor this memorandum implies that Department will determine compliance with the Fair Housing Act based solely on the number of people permitted in each bedroom. [Emphasis added]

The memorandum goes on to reiterate statements taken from the final rule implementing the Fair Housing Amendments Act of 1988 as follows:

- [There is nothing in the legislative history that indicates any intent on the part of Congress to provide for the development of a national occupancy code . . .”
- Thus, the Department believes that in appropriate circumstances, owners and managers may develop and implement reasonable occupancy requirements based on factors such as the number and size of sleeping areas or bedrooms and the overall size of the dwelling unit. In this regard, it must be noted that, in connection with a complaint alleging discrimination on the basis of familial status, the Department will carefully examine any such nongovernmental restriction to determine whether it operates unreasonably to limit or exclude families with children.


Essentially, HUD has established a starting point for assessing the reasonableness of occupancy restrictions, but has stated that the specific facts of each living situation must inform the final determination of reasonableness. While the above discussion relates to matters of discrimination affecting families with children, a similar analysis applies to standards that may limit housing choice for persons with disabilities.

b. **Building Code Regulations**

The City’s zoning regulations establish occupancy limits for efficiency dwelling units, transitional housing and supportive housing. The Uniform Housing Code -- on the basis of square footage -- establishes minimum occupancy limits for all housing. California’s occupancy standard for residential dwellings is an example of a permissible neutral standard:

Room dimensions (b) Floor Area: Dwelling units and congregate residences shall have at least one room which shall have not less than 120 square feet of floor area. Other habitable rooms, except kitchens, shall have an area of not less than 70 square feet. Where more than two persons occupy a room used for sleeping purposes, the required
floor area shall be increased at the rate of 50 square feet for each occupant in excess of two.

According to an analysis of occupancy standards:

The Legislature, by adopting this Uniform Housing Code standard, intends to preempt local occupancy standards generally. Municipalities may deviate from the uniform occupancy standard only if, pursuant to specific state provisions, they make express findings that a deviation is reasonably necessary due to “climatic, geological or topographical conditions.” Local governments should adopt the foregoing Uniform Housing Code standard for compliance with fair housing laws and to address health and safety concerns in the community.


Section 17958.1 of the Health and Safety Code also establishes an occupancy standard in the context of efficiency dwelling units. An “efficiency unit” means:

(a) Notwithstanding Sections 17922, 17958, and 17958.5, a city, county, or city and county may, by ordinance, permit efficiency units for occupancy by no more than *two persons* which have a minimum floor area of 150 square feet and which may also have partial kitchen or bathroom facilities, as specified by the ordinance. In all other respects, these efficiency units shall conform to minimum standards for those occupancies otherwise made applicable pursuant to this part.

c. Conclusions and Recommendations

The City adheres to the Uniform Housing Code standards.

The Zoning Ordinance states an accessory dwelling unit also includes efficiency units as defined in Section 17958.1 of the Health and Safety Code.

The occupancy standards for transitional and supportive housing are discussed in B 5.

C. RESIDENTIAL LAND USE

1. Background

According to HUD:

Zoning and land use laws affect housing choice by determining where housing is built, what type of housing is built, who can live in that housing, and the cost and accessibility of the housing.

For example, limits on multi-unit developments, HUD explains, may include outright bans on multi-unit developments or indirect limits such as height limits and minimum parking requirements.
2. Analysis

The relative amounts of single- and multi-family zoned land is a fair housing concern because communities that are predominantly or exclusively single-family limit the range of available housing choices, and, as a consequence, may adversely impact fair housing protected groups such as racial minorities and disabled people.

Table VII-1 shows that the General Plan allocates approximately two-thirds of the City’s land to residential land uses. Almost 31% of the residential land is devoted to medium and high density residential land uses (628/2050)

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Estimated Acreage</th>
<th>Percent of Total</th>
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<td>High Density Residential</td>
<td>278</td>
<td>9%</td>
</tr>
<tr>
<td>Subtotal Residential</td>
<td>2,050</td>
<td>67%</td>
</tr>
<tr>
<td>Commercial</td>
<td>403</td>
<td>13%</td>
</tr>
<tr>
<td>Industrial</td>
<td>110</td>
<td>4%</td>
</tr>
<tr>
<td>Public/Quasi-Public (Institutional/Civic)</td>
<td>200</td>
<td>6%</td>
</tr>
<tr>
<td>Open Space</td>
<td>306</td>
<td>10%</td>
</tr>
<tr>
<td>Total</td>
<td>3,069</td>
<td>100%</td>
</tr>
</tbody>
</table>


Since the General Plan was adopted, the City has successfully implemented several overlay zones to address the downtown and nearby areas within a Specific Plan area. These overlay zones are intended to encourage new investment and development and to provide opportunities for integrated mixed uses along Bellflower Boulevard and other key corridors. Existing overlays include the Bellflower Village Overlay Zone, the Bellflower Village Overlay Zone – North, and the Bellflower/Alondra Mixed-Use Overlay Zone.

Additionally, two new overlay zones have been created: the Transit Overlay Zone and the Mixed-Use Corridor Overlay Zone. These new overlay zones are tailored to enhance a major corridor and accommodate transit-oriented development adjacent to the future light rail station. The new overlay zones have provisions that include increased heights and densities and strong urban design standards. They also promote a pedestrian-oriented and active street environment. In total, the overlay zones cover 205.4 acres or 51% of the Specific Plan area.

The overlay zones are briefly described below:

Bellflower/Alondra Mixed Use Overlay Zone (BAMU), adopted February 2014

The purpose of the Overlay Zone is to facilitate well-designed new mixed use development that combines residential and non-residential uses and integrates public transit opportunities to
promote a better balance of jobs and housing. Development opportunities include development of 2 to 5 stories and up to 484 housing units.

Bellflower Village Overlay Zone (BVOZ) adopted May 2008

The intent of the Overlay Zone is to encourage the development and redevelopment of the Downtown into a creative, vital place featuring a robust mix of residential and commercial uses.

Bellflower Village Overlay Zone — North (BVOZ—N) adopted May 2011

This Overlay Zone focuses on the heart of downtown Bellflower. Like the BVOZ Overlay Zone, the City determined that the underlying conventional zoning was not successful in promoting the transformation of the area into a creative, pedestrian-friendly, mixed-use environment. The Overlay Zone provides an opportunity to utilize alternative zoning, including development standards and special design guidelines to achieve a mixed-use residential/commercial environment that activates the street, and incorporates additional public open spaces. Several projects have been developed applying this Overlay Zone, including the mixed-use development at 16632 Bellflower Boulevard.

Mixed-Use Transit Overlay Zone (MUTOZ)

The purpose of the Overlay Zone is to foster mixed use environment with high-density residential, retail and services, an outdoor plaza/dining area, and parking for the transit station.

Mixed Use Corridor Overlay Zone (MUCOZ)

The Overlay Zone envisions a walkable residential and commercial corridor that provides local services and employment along with multifamily living.

The amount of land designated for multi-family residential land use has been increased since adoption of the General Plan. Table VII-2 shows the acreage designated for multifamily housing within the Downtown Bellflower Station Area Specific Plan.
Table VII-2
City of Bellflower
Downtown Bellflower Station Area Specific Plan

<table>
<thead>
<tr>
<th>Residential Land Use</th>
<th>Number of Acres</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Density Residential (R-1)</td>
<td>9.77</td>
<td>5.3%</td>
</tr>
<tr>
<td>Medium Density Residential (R-2)</td>
<td>45.72</td>
<td>24.9%</td>
</tr>
<tr>
<td>Multiple Residential (R-3)</td>
<td>123.29</td>
<td>67.3%</td>
</tr>
<tr>
<td>Senior Citizen Housing</td>
<td>4.53</td>
<td>2.5%</td>
</tr>
<tr>
<td>Total</td>
<td>183.31</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: City of Bellflower, The Downtown Bellflower Transit Oriented Development Specific Plan (TOD SP), October 2019, page 62

The amount of vacant and non-vacant land designated for multi-family residential land uses is very likely to be increased by late 2021. By that date the City’s Housing Element will need to be updated to, in part, identify sites to accommodate Bellflower’s share of the regional housing need. The Draft Regional Housing Needs Allocation Plan, prepared by the Southern California Association of Governments (SCAG), allocates almost 3,700 housing units to the City. Table VII-3 shows that almost 1,500 housing units are allocated to lower income households.

Table VII-3
City of Bellflower
Share of Regional Housing Needs
June 30, 2021 – September 30, 2029

<table>
<thead>
<tr>
<th>Income Group</th>
<th>Number</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very Low</td>
<td>1,011</td>
<td>27.1%</td>
</tr>
<tr>
<td>Low</td>
<td>486</td>
<td>13.0%</td>
</tr>
<tr>
<td>Moderate</td>
<td>552</td>
<td>14.8%</td>
</tr>
<tr>
<td>Above Moderate</td>
<td>1,676</td>
<td>45.0%</td>
</tr>
<tr>
<td>Total</td>
<td>3,725</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Source: Southern California Association of Governments, 6th Cycle Regional Housing Needs Assessment Regional Council Approved Draft Allocation Methodology, November 8, 2019

To accommodate a housing need of this sizeable magnitude it will be necessary to designate additional land to the multifamily zones.

3. Conclusions and Recommendations

The City does not impede the development of multifamily housing as it has designated land in the Overlay Zones for multi-family housing development. The number of acres designated for multifamily housing probably will need to be increased in order to accommodate the City’s share of the regional housing need. This need will be addressed by the City during the preparation of the 2021-2029 Housing Element.
SECTION VIII
PRIVATE/PUBLIC SECTOR IMPEDIMENTS ANALYSIS
A. INTRODUCTION

HUD’s *Fair Housing Planning Guide* suggests an AI format that includes an assessment of impediments that overlap the public and private sectors. Some fair housing issues are not exclusively within the domain of either the private or public sectors. Section VIII provides an analysis of the following fair housing issues:

- Location of affordable rental housing developments
- Demographics of publicly supported housing
- Gentrification
- Fair housing enforcement

B. LOCATION OF AFFORDABLE RENTAL HOUSING DEVELOPMENTS

1. Background

The *Fair Housing Planning Guide* states that an objective of the AI is to —

Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability and national origin.

A major objective of the Housing and Community Development Act of 1974 was —

…the reduction of the isolation of income groups within communities and geographical areas and the promotion of an increase in the diversity and vitality of neighborhoods through the spatial deconcentration of housing opportunities for persons of lower income and the revitalization of deteriorating or deteriorated neighborhoods....

2. Analysis

a. Housing Opportunity Mapping

1. Background

In 2015 HUD developed -Opportunity Indices- to measure the disparities in access to opportunity among and between a community’s neighborhoods. The indices measured access to low poverty neighborhoods; educational opportunities; employment; transportation; and healthy physical environments.

In February 2017, HCD and the California Tax Credit Allocation Committee (TCAC) convened a group of independent organizations and research centers that would become the California Fair Housing Task Force. HCD provided a problem statement related to fair housing:

Housing policy, program guidelines, and regulations have untapped potential to both prevent further segregation and poverty concentration as well as encourage access to opportunity.

HCD also shared its policy goals:

- Avoid further segregation and concentration of poverty, and
SECTION VIII PRIVATE/PUBLIC SECTOR IMPEDIMENTS ANALYSIS

- Encourage additional access to opportunity through land use policy and affordable housing program design and implementation.

HCD and TCAC asked the Task Force to create a statewide opportunity mapping tool that could be adopted into TCAC regulations to incentivize the development of large-family, new construction developments with 9% Low Income Housing Tax Credits (LIHTCs) in high resource neighborhoods. The Task Force acknowledged that LIHTC projects historically have been located in low resource and segregated neighborhoods. In fact, TCAC re-evaluated the distribution of new construction of family rental housing developments from 2000 to 2016 and found that in Los Angeles County 53% of all units were constructed in neighborhoods with a high degree of segregation and poverty.

(The California Tax Credit Allocation Committee (TCAC) facilitates the investment of private capital into the development of affordable rental housing for low-income Californians. TCAC allocates federal and state tax credits to the developers of these projects. Corporations provide equity to build the projects in return for the tax credits. TCAC verifies that the developers have met all the requirements of the program and ensures the continued affordability and habitability of the developments for the succeeding 55 years.)

2. Opportunity Mapping Tool

The opportunity mapping tool uses 12 indicators and a filter for high-poverty, racially segregated areas. Each indicator and the filter were measured for each census tract located in the State. The tool calculated index scores for each census tract located in eight regions of California. Bellflower is located in the Los Angeles County Region. Table VIII-1 lists the indicators and measures used to calculate the opportunity score of each census tract located in California.

The tool allocates the 20% of the census tracts in each region with the highest relative index scores to the -Highest Resource- designation and the next 20% to the -High Resource- designation. Each region thus ends up with 40% of its total tracts as -Highest- or -High- resource. These two categories are intended to help State decision-makers identify those tracts within each region that the research suggests low-income families are most likely to thrive, and where they typically do not have the option to live—but might, if given the choice. In effect, this approach is intended to incentivize development in higher-resourced neighborhoods. [Emphasis added]

The tool filters for high-poverty, racially segregated areas. The poverty threshold is set at 30% or more poverty. It then identifies which of these neighborhoods have a high concentration of minority households in comparison to the county, and that are considered to be racially segregated compared to the areas around them. Tracts that have both a high level of poverty and a high level of racial segregation are filtered into the -High Segregation & Poverty- category.

As tracts are filtered to the -High Segregation & Poverty- category or excluded from categorization, non-filtered and non-excluded tracts fill-in to the -High Resource- and -Highest Resource- categories as necessary, based on the index score ranking. This ensures that regardless of the number of filtered or excluded tracts, every region (or county in rural areas) receives the same proportion of -High Resource- and -Highest Resource- tracts.
### Table VIII-1

**California Fair Housing Task Force**  
**Opportunity Mapping Indicators and Measures**

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Poverty</td>
<td>Percent of the population with incomes above 200% of the federal poverty level</td>
</tr>
<tr>
<td>Adult Education</td>
<td>Percent of adults with a bachelor’s degree or above</td>
</tr>
<tr>
<td>Employment</td>
<td>Percent of adults age 20-59 who are employed in the civilian labor force or in the armed forces</td>
</tr>
<tr>
<td>Job Proximity</td>
<td>Number of jobs filled by workers with less than a BA that fall within a given radius (determined by the typical commute distance of low wage workers in each region) of each census tract population weighted centroid</td>
</tr>
<tr>
<td>Median Home Value</td>
<td>Value of owner-occupied units</td>
</tr>
<tr>
<td>CalEnviroScreen</td>
<td>CalEnviroScreen 3.0 Pollution Indicators</td>
</tr>
<tr>
<td>Math Proficiency</td>
<td>Percentage of 4th graders who meet or exceed math proficiency</td>
</tr>
<tr>
<td>Reading Proficiency</td>
<td>Percentage of 4th graders who meet or exceed literacy standards</td>
</tr>
<tr>
<td>High School Graduation Rates</td>
<td>Percentage of high school cohort that graduate on time</td>
</tr>
<tr>
<td>Student Poverty Rate</td>
<td>Percent of students not receiving free or reduced-price lunch</td>
</tr>
<tr>
<td>Poverty</td>
<td>Tracts with at least 30% of the population falling under the federal poverty line</td>
</tr>
<tr>
<td>Racial Segregation</td>
<td>Tracts with a racial Location Quotient of higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the county(^1)</td>
</tr>
</tbody>
</table>

\(^1\)The LQ is a small-area measure of relative segregation calculated at the residential census tract level. It is a representation of how much more segregated a person’s neighborhood (census tract) is relative to the larger overall metropolitan area (or county). For the filter, tracts that have a LQ higher than 1.25 for Blacks, Hispanics, Asians, or all people of color are flagged as being racially segregated in comparison to the county.

Source: California Fair Housing Task Force, *Opportunity Mapping Methodology*, Updated November 27, 2018, pages 7 and 8

#### b. SCAG’s Regional Housing Needs Allocation Plan

The Southern California Association of Governments (SCAG) is required to develop a methodology for distributing the existing and projected housing need to each jurisdiction in the six county Region, which includes the counties of Ventura, Los Angeles, Orange, Riverside, San Bernardino and Imperial. According to HCD, the Region's total housing need is 1,341,827 housing units for the period from June 30, 2021 to October 15, 2029 [8.3 years]. (Source: HCD letter to SCAG, *Final Regional Housing Needs Assessment*, October 15, 2019)

Pursuant to the State Housing Element law, the methodology for distributing the regional housing need must allocate a lower proportion of housing need to jurisdictions that already have a disproportionately high concentration of those households in comparison to the county distribution.
According to SCAG, a social equity adjustment ensures that jurisdictions accommodate their fair share of each income group: very low, low, moderate, and above moderate. The Draft RHNA Methodology explains:

Once a jurisdiction’s existing household income distribution by income category is determined, the percentage is compared to the county’s percentage of existing household income distribution. For example, if a jurisdiction has an existing distribution of 30 percent of very low income households while the county is 25 percent, the jurisdiction is considered as having an overconcentration of very low income households compared to the county. A social equity adjustment ensures that the jurisdiction will be assigned a smaller percentage of very low income households for its RHNA allocation than both what it currently has and what its county currently has (provided that the percentage is higher than 100 percent).

Source: Southern California Association of Governments, Draft RHNA Methodology, approved by the Regional Council on November 7, 2019, page 13

Government Code Section 65584.04(a) requires that the RHNA methodology further the five objectives of the Regional Housing Needs Assessment one of which is to affirmatively further fair housing, as defined below:

- affirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

According to the Draft RHNA Methodology -

Assigning a higher social equity adjustment based on Opportunity Indices [developed by TCAC/HCD as described above] will result in a higher percentage of affordable housing units to areas that have higher resources. Concurrently, it will assign a lower percentage of affordable housing in areas where there is already an overconcentration. Because Opportunity Indices consider factors such as access to lower wage jobs, poverty rates, and school proficiency, the social equity adjustment in the draft RHNA methodology will result in factors beyond simply household income distribution. This additional adjustment will help to adjust the disparity in access to fair housing across the region, furthering the AFFH objective required in State housing law.

Source: Southern California Association of Governments, Draft RHNA Methodology, approved by the Regional Council on November 7, 2019, page 16 [Emphasis added]

c. Bellflower’s Neighborhoods by Resource Category

Eighteen census tracts are located within the city boundaries of which two are high resource and 10 are moderate resource. Table VIII-2 lists these 18 census tracts by resource category. Exhibit VIII-1 and VIII-2 show the boundaries of the two high resource census tracts.
Table VIII-2
City of Bellflower
Neighborhoods/Census Tracts
By Resource Level: 2019

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Resource Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>5531.00</td>
<td>Moderate</td>
</tr>
<tr>
<td>5532.00</td>
<td>High</td>
</tr>
<tr>
<td>5533.00</td>
<td>High</td>
</tr>
<tr>
<td>5540.01</td>
<td>Moderate</td>
</tr>
<tr>
<td>5540.02</td>
<td>Moderate</td>
</tr>
<tr>
<td>5541.01</td>
<td>Low</td>
</tr>
<tr>
<td>5541.03</td>
<td>Moderate</td>
</tr>
<tr>
<td>5541.04</td>
<td>Moderate</td>
</tr>
<tr>
<td>5541.05</td>
<td>High Segregation &amp; Poverty</td>
</tr>
<tr>
<td>5542.01</td>
<td>Moderate</td>
</tr>
<tr>
<td>5542.03</td>
<td>Moderate</td>
</tr>
<tr>
<td>5542.04</td>
<td>Low</td>
</tr>
<tr>
<td>5543.01</td>
<td>Low</td>
</tr>
<tr>
<td>5543.02</td>
<td>Low</td>
</tr>
<tr>
<td>5544.03</td>
<td>Moderate</td>
</tr>
<tr>
<td>5544.04</td>
<td>Low</td>
</tr>
<tr>
<td>5544.05</td>
<td>Moderate</td>
</tr>
<tr>
<td>5544.06</td>
<td>Moderate</td>
</tr>
</tbody>
</table>

Source: TCAC/HCD Opportunity Area Maps, 2019
Statewide Summary Table, Los Angeles County Region

The conditions and opportunities in each census tract may change in the future depending on factors that may include, but are not limited, to each neighborhood's residential vacant land, infill development opportunities, demand for market rate housing, school proficiency improvements, and place-based improvement strategies that the City may employ in the future.
Census Tract 5532
Census Tract 5533
d. **Location of Bellflower’s Affordable Rental Housing Developments**

The Housing Opportunity mapping is intended to foster the development of *family rental housing* in neighborhoods with greater than lesser opportunities for families and their children. It is a forward-looking policy that seeks to avoid TCAC’s past location decisions which resulted in the majority of affordable family housing developments being constructed in high poverty and segregated neighborhoods.

Although affordable rental housing developments have been constructed in Bellflower, they have accommodated the needs of seniors, not families. The senior developments include Bellflower Friendship Manor, Bellflower Terrace, and Oak Street Manor.

Two ownership developments containing two- and three-bedroom units have been developed — Bellflower Village-Walnut Street and Belmont Court.

In addition, there are two affordable CHDO projects:

- Our Place Housing Solutions CHDO
- HOPE CHDO

e. **Fair Housing and the Location of Affordable Housing Developments**

In California and other states, the major source for funding affordable housing developments is the *Low Income Housing Tax Credit Program*, a program administered by the U.S. Department of Treasury. Section 42(m)(1)(B)(ii) of the Internal Revenue Code requires every state Qualified Allocation Plan (QAP) to contain a preference in allocating housing credit dollar amounts among selected projects to ... projects which are located in qualified census tracts ... and the development of which contributes to a *concerted community revitalization plan*.

The QAP is a document that states, and a few local agencies, must develop in order to distribute federal *Low Income Housing Tax Credits* (LIHTCs), which can be awarded only to a building that fits the QAP’s priorities and criteria. Each QAP must spell out a housing finance agency’s (HFA’s) priorities and specify the criteria it will use to select projects competing for tax credits. The priorities must be appropriate to local conditions.

The QAP must also give preference to projects:

- Serving residents with the lowest income;
- Serving income-eligible residents for the longest period of time; and,
- Located in qualified census tracts (QCTs) or difficult development areas (DDAs), as long as the project contributes to a concerted community revitalization plan.

The QAP selection criteria must address 10 items: (1) location; (2) housing needs; (3) public housing waiting lists; (4) individuals with children; (5) special needs populations; (6) whether a project includes the use of existing housing as part of a community revitalization plan; (7) project sponsor characteristics; (8) projects intended for eventual tenant ownership; (9) energy efficiency; and (10) historic nature. These requirements are minimums; states can adopt more rigorous criteria that target priority populations and locations. Most states establish detailed QAP selection criteria and set-asides based on the characteristics of their state’s needs.
Qualified census tracts are designated by HUD and include those having 50% or more of all households with incomes less than 60% of the area median income or a poverty rate of at least 25%. Bellflower has three Qualified Census Tracts:

- 5541.01
- 5541.05
- 5544.03

The IRS has stated:

In some cases, state or local agencies allocating housing credit dollar amounts have given preference to projects that are located in qualified census tracts without regard to whether the projects contribute to a concerted community revitalization plan. In some other cases, because development of new multifamily housing benefits a neighborhood, the development of a LIHTC project, without more, has been treated as if it were such a plan.

Source: IRS Notice 2016-77

In Revenue Ruling 2016-29, the IRS discussed whether the Internal Revenue Code encourages State agencies (e.g., the California Tax Credit Allocation Committee) to reject projects that do not obtain local approval. The Revenue Ruling provides the following hypothetical:

In State X, local approval is much more likely to be secured for proposed LIHTC developments in areas with greater proportions of minority residents and fewer economic opportunities than in higher-opportunity, non-minority communities. Agency’s practice of requiring local approval has created a pattern of allocating housing credit dollar amounts to projects in the predominantly lower-income or minority areas, with the result of perpetuating residential racial and economic segregation in State X.

With respect to general federal fair housing policy, the Revenue Ruling provides the following hypothetical:

Agency’s practice of requiring local approval has created a pattern of allocating housing credit dollar amounts that has perpetuated residential racial segregation in State X. Agency’s practice, therefore, has a discriminatory effect based on race, which is a protected characteristic under 42 USC 3604. Thus, the practice is inconsistent with at least the policy of the Fair Housing Act of 1968 (the Act), 42 USC 3601–3619.

Source: Revenue Ruling 2016-2019

In Notice 2016-77, the IRS requested comments on how to define the parameters of a concerted community revitalization plan. The IRS has not yet published the criteria for an acceptable concerted community revitalization plan.

f. Sites to Accommodate the City’s Share of the Regional Housing Needs

The City is required to update its Housing Element by October 2021 to cover the period from October 2021 to October 2029. An important component of the Housing Element Update is the identification of sites that can accommodate the housing needs of lower income families, including sites for multifamily rental housing developments.
The lower income housing need of almost 1,500 housing units allocated by SCAG to the City means it will be impossible to accommodate all of the housing need on vacant multifamily housing sites which may be located in high resource-neighborhoods. Sites in moderate and low resource neighborhoods will need to be identified as well.

3. Conclusions and Recommendations

Impediments to fair housing choice include:

- There are few, if any, multifamily zoned sites in high resource neighborhoods.
- Access to opportunity is limited in moderate and low resource neighborhoods.
- The lack of concerted community revitalization plans in the three Qualified Census Tracts impedes the development of affordable rental housing.

Action 1: Sites Inventory and Analysis

In FY 2020-2021, during the process of updating the Housing Element, the City will consider taking the following actions:

- Identify vacant and non-vacant residential sites located in the two high resource neighborhoods
- Identify vacant and developed non-residential sites that that can be re-zoned to residential use in the two high resource neighborhoods.

Action 2: Create Place-Based Strategies to Improve Access to Opportunity in the Moderate and Low Resource Neighborhoods

In FY 2021-2022, after the sites are identified, the City will consider implementing placed-based strategies in the moderate and low resource neighborhoods and Qualified Census Tracts. The strategies could include initiatives to reduce poverty, improve educational achievement, reduce unemployment and address other neighborhood needs.

The purpose of the place-based strategies is to increase the competitiveness of LIHTC applications for the development of affordable housing to be located in the moderate and low resource neighborhoods and the three Qualified Census Tracts.

C. DEMOGRAPHICS OF PUBLICLY SUPPORTED HOUSING

1. Background

HUD is interested in the demographics of the occupants of publicly supported housing compared to the demographics of the jurisdiction and neighborhood in which such housing is located. For example, a comparison will inform a city of whether developments are occupied by largely the same race/ethnicity as in the neighborhood.

2. Analysis

The Housing Authority of the County of Los Angeles compiled data on the number of Section 8 Voucher Holders by ethnicity. The Housing Authority did not provide a count by race and was unable to provide a count at the census tract level. There are 635 Section 8 voucher holders calling Bellflower home - 457 non—Hispanic (72%) and 176 (28%) Hispanic households. The
percentage of Hispanic voucher holder is much less than the percentage that this population group represents of Bellflower’s total population (50.8%). The 635 Section 8 Voucher Holders comprise 4.4% of all the City’s renter households.

Table VIII-3 reports on the ethnicity of householders living in the two LIHTC developments: 25% Hispanic and 75% non-Hispanic.

Table VIII-4 compares the race of the occupants of two LIHTC developments to the citywide characteristics. It is not possible to draw definite conclusions from the available data because of the high number of No Responses and Missing Response and the high percentage of persons living in the City who responded -Other Race-.

Table VIII-5 shows that almost 10% of the householders living in the two LIHTV developments are disabled.

3. **Conclusions and Recommendations**

The demographics of individual developments have evolved since the projects were built and also may change in the future when the turnover of owner- and renter-occupied housing occurs.

It was determined that no impediment to fair housing choice exists because of the demographics of the occupants of LIHTC affordable housing developments.

However, to affirmatively further fair housing, the City will take the following actions:

**Action 1: Continue Affirmative Marketing Actions for HOME Units**

The City will continue to affirmatively market CDBG and HOME funded programs. Marketing efforts will include advertising housing programs in local publications. The City will continue to promote fair housing by ensuring outreach to all potential eligible households, especially those least likely to apply for housing assistance. Affirmative marketing will consist of providing information and otherwise attracting eligible persons to available housing without regard to race, color, national origin, sex, religion, familial status or disability.

The City will collect and maintain statistical information on race and ethnicity of applicants and assisted households to ensure all segments of the community are being served.

**Action 2: Continue to Implement a Limited English Proficiency Plan**

The City has a significant portion of Spanish-speaking residents. To ensure that all residents are aware of programs, the City will continue to implement a Limited English Proficiency Plan, including publishing program brochures and information publications in both the English and Spanish languages.
Table VIII-3
City of Bellflower
Ethnicity of Occupants of LIHTC Developments: 2018

<table>
<thead>
<tr>
<th>Development</th>
<th>Hispanic</th>
<th>Not-Hispanic</th>
<th>Unknown</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bellflower Terrace</td>
<td>20</td>
<td>27</td>
<td>1</td>
<td>48</td>
</tr>
<tr>
<td>Bellflower Friendship Manor</td>
<td>19</td>
<td>92</td>
<td>2</td>
<td>113</td>
</tr>
<tr>
<td>Total</td>
<td>39</td>
<td>119</td>
<td>3</td>
<td>161</td>
</tr>
</tbody>
</table>

Source: California Tax Credit Allocation Committee, Spectrum Report – 2018 Race/Ethnicity Data for the City of Bellflower

Table VIII-4
City of Bellflower
Race of Occupants of LIHTC Developments: 2018

<table>
<thead>
<tr>
<th>Race</th>
<th>Bellflower Terrace</th>
<th>Bellflower Friendship Manor</th>
<th>Total</th>
<th>Project Percent</th>
<th>City Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asian</td>
<td>0</td>
<td>43</td>
<td>43</td>
<td>30.3%</td>
<td>11.6%</td>
</tr>
<tr>
<td>Black/African American</td>
<td>12</td>
<td>15</td>
<td>27</td>
<td>19.0%</td>
<td>14.2%</td>
</tr>
<tr>
<td>Pacific Islander</td>
<td>1</td>
<td>0</td>
<td>1</td>
<td>0.7%</td>
<td>1.1%</td>
</tr>
<tr>
<td>White</td>
<td>18</td>
<td>41</td>
<td>59</td>
<td>41.5%</td>
<td>33.2%</td>
</tr>
<tr>
<td>Multi Race</td>
<td>0</td>
<td>3</td>
<td>3</td>
<td>2.1%</td>
<td>3.8%</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>9</td>
<td>9</td>
<td>6.3%</td>
<td>36.1%**</td>
</tr>
<tr>
<td>No Response</td>
<td>17</td>
<td>1</td>
<td>18</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Missing</td>
<td>0</td>
<td>1</td>
<td>1</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Total</td>
<td>48</td>
<td>113</td>
<td>161</td>
<td>100.0%*</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

*Percent based on the number (142) who responded to this question.
**Includes 0.4% American Indian/Alaska Native
Source: California Tax Credit Allocation Committee, Spectrum Report – 2018 Race/Ethnicity Data for the City of Bellflower

Table VIII-5
City of Bellflower
Disability of Occupants of LIHTC Developments: 2018

<table>
<thead>
<tr>
<th>Development</th>
<th>Disabled</th>
<th>Not Disabled</th>
<th>Unknown</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bellflower Terrace</td>
<td>0</td>
<td>48</td>
<td>0</td>
<td>48</td>
</tr>
<tr>
<td>Bellflower Friendship Manor</td>
<td>14</td>
<td>98</td>
<td>1</td>
<td>113</td>
</tr>
<tr>
<td>Total</td>
<td>14</td>
<td>146</td>
<td>1</td>
<td>161</td>
</tr>
</tbody>
</table>

Source: California Tax Credit Allocation Committee, Spectrum Report – 2018 Race/Ethnicity Data for the City of Bellflower
D. GENTRIFICATION

1. Background - Gentrification Defined

Gentrification is a process involving an increase in housing rents and prices in existing neighborhoods that causes the displacement of lower income residents due to the housing market pressures. When no new housing is involved, gentrification takes place through succession as vacant rentals or homes are rented or bought by middle or higher income households. Over time, as this process continues the middle and higher income households outbid the lower income households and, as a consequence, the neighborhood gentrifies.

With respect to the fair housing consequences of gentrification, the National Fair Housing Alliance has offered the following thoughts:

Gentrification is the process of redevelopment that is spurred by the influx of more affluent, mostly White individuals into previously deprived, under-resourced, low-income communities of color. Redevelopment through gentrification typically entails change in neighborhood character and culture and an increase in the cost of living that prices out original residents. Gentrification is fundamentally an economic process, yet the neighborhood transition that typically ensues is deeply racial, cultural, and sometimes ethnic, affecting Blacks, Latinos, and Asian Americans. With variations, gentrification operates as a powerful development pattern in housing markets in cities across the country.

The fair housing implications of gentrification associated with residential integration are complicated. Despite temporary increases in racial and ethnic integration as White residents move into previously non-White neighborhoods at the onset of gentrification, the resulting dislocation that occurs to the pre-existing residents as the process unfolds and market values increase further marginalizes communities of color through residential displacement. In the context of the persistent affordable housing crisis plaguing many cities across the country, displaced low-income residents are relegated to low-opportunity areas, generally fortifying entrenched racial and ethnic residential segregation. In this way, gentrification pressures ultimately reinforce patterns of segregation.

Although HUD has currently suspended local governments' obligation to submit Assessment of Fair Housing plans until October 2020 or thereafter, jurisdictions may still look to HUD guidance for information on how to comply with the mandate that HUD funds are used to affirmatively furthering fair housing. In August 2016, HUD released the Fair Housing Assessment Tool for Local Governments, which provides guidance to jurisdictions that receive HUD community development funds on factors associated with residential segregation they should consider when conducting their fair housing planning processes, and it specifically advises jurisdictions to consider displacement due to economic pressures. As such, in order for local jurisdictions to credibly certify to HUD that they are affirmatively furthering fair housing, they should consider the fair housing implications of gentrification.

The Fair Housing Assessment Tool for Local Governments states the following about the displacement of residents due to economic pressures:

VIII-13
- The term ‘displacement’ refers here to a resident’s undesired departure from a place where an individual has been living. ‘Economic pressures’ may include, but are not limited to, rising rents, rising property taxes related to home prices, rehabilitation of existing structures, demolition of subsidized housing, loss of affordability restrictions, and public and private investments in neighborhoods. Such pressures can lead to loss of existing affordable housing in areas experiencing rapid economic growth and a resulting loss of access to opportunity assets for lower income families that previously lived there. Where displacement disproportionately affects persons with certain protected characteristics, the displacement of residents due to economic pressures may exacerbate patterns of residential segregation.1

National Fair Housing Alliance, Making Every Neighborhood a Place of Opportunity: 2018 Fair Housing Trends Report, 2018, pages 74 and 75

2. Analysis

a. Change in Low/Moderate Income Neighborhoods

For purposes of this analysis, a low/moderate income neighborhood is defined as a block group with 51% or more of its population with low/moderate incomes. Gentrification is measured by the change from a low/moderate income neighborhood (51%+) to a neighborhood that is no longer low/moderate income (<51%). In the past five to 10 years, five block groups changed from a low/moderate to a non-low/moderate income neighborhood. In these five block groups, the decrease in the low/moderate income population ranged from approximately 12% to 22%. Three of the block groups are located in Census Tract 5532. Table VIII-6 lists the five block groups and Table VIII-7 describes the street boundaries of each block group.

The block groups are built out and during the past five to 10 year period there has been very limited residential development in these neighborhoods. The income changes could be the result that, as rental turnover happened and existing homes were sold, the new occupants compared to the prior occupants had higher incomes. Another possible cause is that the residents did not move but rather experienced income gains that elevated them above the low/moderate income threshold. In any event, the income changes were not caused by the demolition of a large number of existing housing units, their replacement with new housing, and the displacement of existing residents.

b. Change in the Housing Stock

Between 2010 and 2015, 20 housing units were added to the housing stock. Thirty units were constructed in structures with 5 or more units. Ten units were lost – eight single-family units and two units in a duplex.

New residential construction of this modest scale would not have caused the gentrification of an entire neighborhood.
Table VIII-6  
City of Bellflower  
Census Tract Block Groups Where Percent Low/Mod Was 51%+ in 2006  
And Where Percent Low/Mod Was Below 51% in 2015

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Block Group</th>
<th>2006 Percent Low/Mod &gt;51%</th>
<th>2015 Percent Low/Mod &lt;51%</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>5531.00</td>
<td>1</td>
<td>64.76%</td>
<td>50.70%</td>
<td>-14.06%</td>
</tr>
<tr>
<td>5532.00</td>
<td>2</td>
<td>52.47%</td>
<td>40.24%</td>
<td>-12.23%</td>
</tr>
<tr>
<td>5532.00</td>
<td>6</td>
<td>57.22%</td>
<td>40.61%</td>
<td>-16.61%</td>
</tr>
<tr>
<td>5532.00</td>
<td>7</td>
<td>54.95%</td>
<td>35.50%</td>
<td>-19.45%</td>
</tr>
<tr>
<td>5544.05</td>
<td>1</td>
<td>52.84%</td>
<td>31.11%</td>
<td>-21.73%</td>
</tr>
</tbody>
</table>

Note: Four other Block Groups also experienced significant percentage decreases in the low/mod population. Despite the percentage decreases they remained above 51%. Those block groups are: Census Tract 5541.01 Block Group 2 (-13.89%); Census Tract 5541.04 Block Group 1 (-28.70%); Census Tract 5543.01 Block Group 1 (-17.10%) and Census Tract 5543.02 Block Group 2 (-34.36%)

Source: ACS 5-Year 2006-2010 and 2011-2015 Low- and Moderate-Income Summary Data

Table VIII-7  
City of Bellflower  
Census Tract Block Group Boundaries

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Block Group</th>
<th>Boundaries</th>
</tr>
</thead>
<tbody>
<tr>
<td>5531.00</td>
<td>1</td>
<td>Rosecrans Avenue, City limits, Woodruff Avenue, Compton Boulevard</td>
</tr>
<tr>
<td>5532.00</td>
<td>2</td>
<td>Foster Road, Regent View Avenue, Faust Avenue, Arthurdale, Woodruff Avenue, Rosecrans Avenue</td>
</tr>
<tr>
<td>5532.00</td>
<td>6</td>
<td>Foster Road, Bellflower Boulevard, Charlemagne Avenue, Van Ruiten Street, Ardis Avenue, Rosecrans Avenue</td>
</tr>
<tr>
<td>5532.00</td>
<td>7</td>
<td>Foster Road, Charlemagne Avenue, Van Ruiten Street, Ardis Avenue, Rosecrans Avenue, Clark Avenue</td>
</tr>
<tr>
<td>5544.05</td>
<td>1</td>
<td>Park Street, Woodruff Avenue, Bellflower Boulevard, Artesia Boulevard</td>
</tr>
</tbody>
</table>
3. Conclusions and Recommendations

The displacement of low income residents which results in neighborhood gentrification does not appear to be a fair housing issue in Bellflower. Therefore, the AI has concluded that gentrification is not an impediment to fair housing choice.

However, indicators of gentrification should be monitored to determine if gentrification has the potential of emerging as a fair housing impediment. It is noteworthy that Kingdom Causes in response to stakeholder interview questions remarked on the need of providing pathways to economic sustainability for our low-income families who have deep histories in Bellflower, but are vulnerable to displacement due to being renters.

E. FAIR HOUSING ENFORCEMENT

1. Background

HUD’s *Fair Housing Planning Guide* includes a suggested AI outline that identifies fair housing enforcement as a potential impediment to fair housing choice. HUD’s *AFFH Guidebook* states the following regarding the lack of private fair housing outreach and enforcement:

The term –local private fair housing outreach and enforcementl refers to outreach and enforcement actions by private individuals and organizations, including such actions as fair housing education, conducting testing, bringing lawsuits, arranging and implementing settlement agreements. A lack of private enforcement is often the result of a lack of resources or a lack of awareness about rights under fair housing and civil rights laws, which can lead to underreporting of discrimination, failure to take advantage of remedies under the law, and the continuation of discriminatory practices. Activities to raise awareness may include technical training for housing industry representatives and organizations, education and outreach activities geared to the general public, advocacy campaigns, fair housing testing and enforcement.


2. Analysis

The enforcement of fair housing laws is accomplished by HUD, the California Department of Fair Employment and Housing (DFEH) and the Fair Housing Foundation.

The DFEH is responsible for enforcing state fair housing laws that make it illegal to discriminate. The DFEH may file signed complaints with HUD if the matter falls within the jurisdiction of that agency. As a substantially equivalent agency, DFEH’s findings are usually accepted by HUD.

The Fair Housing Act contemplates that, across the country, state and local governments will enact and enforce their own statutes and ordinances that are substantially equivalent to the Fair Housing Act. HUD provides funding annually on a noncompetitive basis to state and local agencies that administer fair housing laws that provide rights and remedies that are substantially equivalent to those provided by the federal Fair Housing Act.
A state or local agency may be certified as substantially equivalent after it applies for certification and HUD determines that the agency administers a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. Typically, once certified, HUD will refer complaints of housing discrimination that it receives to the state or local agency for investigation.

Locally, The Fair Housing Foundation contracts and provides fair housing services directly to Bellflower and 23 other cities.

FHF maintains one office in Long Beach at 3605 Long Beach Blvd., Suite 302, Long Beach, CA 90807, and a second office in Anaheim at 2300 E. Katella Ave., Suite 405, Anaheim, CA 92806. Both offices are open for business Monday through Friday, 8:00am to 5:00pm. FHF’s Board of Directors is responsible for overseeing the organization. The Board, through quarterly meetings and interaction with the Executive Director, remains informed of the day-to-day operation of FHF, which ensures their capacity for maintaining program and fiscal integrity.

FHF staff consists of the Executive Director, a Program Manager, a Fair Housing Specialist, an Outreach Coordinator, a Case Analyst, a Project Specialist, and a Senior Housing Counselor. Services are provided in English and Spanish.

FHF’s success is due, in part, to maintaining staff’s expertise of laws, regulations and court decisions by utilizing all appropriate resources available. Staff training and continued education are invaluable assets to FHF, as well as the further development of existing staff’s knowledge, expertise and interest in fair housing issues. FHF staff members are encouraged to network with other fair housing agencies as well, thus maximizing the assortment of resources outside of FHF’s service area.

3. Conclusions and Recommendations

No impediment to fair housing exists because of the lack of an organization to enforce fair housing laws.