

Analysis of Impediments to Fair Housing Choice FY2020-2024

Adopted by City Council
May 12, 2020

TABLE OF CONTENTS

I. EXECUTIVE SUMMARY	I-1
A. Introduction and Background	I-1
B. Methodology and Citizen Participation	I-3
C. Status of Prior Impediments and Recommendations	I-5
D. Current Impediments to Fair Housing Choice and Recommendations in Hawthorne.....	I-5
II. COMMUNITY CHARACTERISTICS.....	II-1
A. Historical Profile.....	II-1
B. Demographic Profile	II-2
C. Income Profile	II-16
D. Housing Profile.....	II-21
E. Special Housing Needs Profile.....	II-30
III. ANALYSIS OF PRIVATE SECTOR IMPEDIMENTS	III-1
A. Owner-Occupied Housing.....	III-1
B. Rental Housing	III-12
IV. ANALYSIS OF PUBLIC POLICY IMPEDIMENTS	IV-1
A. Land Use Policy.....	IV-1
B. Fair Housing Impediment Study: Review of the General Plan and Zoning Ordinance	IV-9
C. Development Policy.....	IV-12
D. Housing-Employment-Transportation Linkage	IV-19
V. ANALYSIS OF CURRENT FAIR HOUSING ACTIVITY	V-1
A. Fair Housing Education	V-1
B. Fair Housing Enforcement.....	V-2
C. National Fair Housing Enforcement.....	V-4
D. State of California Fair Housing Enforcement.....	V-7
E. Hawthorne Resident Perspectives on Fair Housing Choice.....	V-8
F. Hate Crimes	V-10
G. Fair Housing Legal Status	V-11
VI. CONCLUSIONS AND RECOMMENDATIONS	VI-1
A. Prior-Identified Impediments to Fair Housing Choice	VI-1
B. New Impediments to Fair Housing Choice	VI-1
C. Recommendations to Address Impediment(s) to Fair Housing Choice	VI-2
VII. APPENDIX	APP-A
Signature Page	APP-A
Analysis of Impediments Tables	
Table II-I Demographics of the City of Hawthorne (Jurisdiction)	II-4
Table II-II Demographics of Los Angeles-Long Beach-Anaheim, CA (Region).....	II-5
Table II-III Demographic Trends of Hawthorne (Jurisdiction)	II-6

Table II-IV Demographic Trends of Los Angeles-Long Beach-Anaheim, CA (Region)	II-7
Table II-V Racial/Ethnic Dissimilarity Trends	II-13
Table II-VI R/ECAP Demographics for Hawthorne	II-19
Table II-VII R/ ECAP Demographics for Region.....	II-20
Table II-VIII Publicly Supported Houses by Program Category	II-21
Table II-IX Publicly Supported Houses by Race and Ethnicity	II-22
Table II-X Demographics of Houses with Disproportionate Housing Needs	II-25
Table II-XI Demographics of Households with Severe Housing Cost Burdens	II-27
Table II-XII Opportunity Indicators by Race/Ethnicity	II-30
Table II-XIII Disability by Type.....	II-31
Table II-XIV Disability by Age Group.....	II-32
Table II-XV Disability by Publicly Supported Housing Program Category	II-33
Table III-I Home Loan Application Activity in Hawthorne.....	III-5
Table III-II Home Loan Approval Rates by Applicant Characteristics.....	III-7
Table III-III Home Loan Approval Rates by Tract Characteristics	III-8
Table IV-I General Plan Land Use Designations & Zone Allowing Residential Uses	IV-1
Table IV-II Housing Opportunities Permitted by Zone.....	IV-4
Table IV-III Licensed Residential Care Facilities in Hawthorne	IV-8
Table IV-IV Fair Housing Impediment Study.....	IV-9
Table IV-V Single-Family Residential Development Standards	IV-13
Table IV-VI Multi-Family Residential Development Standards	IV-13
Table IV-VII Comparison of Planning Fees.....	IV-14
Table IV-VIII Development Impact Fees.....	IV-15
Table IV-IX Major Employers in Hawthorne	IV-22
Table IV-X Public Services and Facilities.....	IV-23
Table IV-XI MTA Bus Lines in Hawthorne.....	IV-24
Table V-I Fair Housing Discrimination Complaints by Basis.....	V-3
Table V-II Fair Housing Discrimination Complaints: Findings and Disposition	V-4
Table V-III HUD & FHAP Discrimination Complaints in 2017.....	V-6
Table V-IV FY 2014 -2017 Issues in HUD & FHAP Complaints.....	V-7
Table V-V Hate Crimes Incidents Reported to the FBI in Hawthorne 2015-2018.....	V-10

Analysis of Impediments Maps

Map II-I National Origin	II-9
Map II-II Limited English Proficiency	II-10
Map II-III School Proficiency	II-11
Map II-IV Race/Ethnicity.....	II-14
Map II-V Race/Ethnicity Trends	II-15
Map II-VI Demographics and Job Proximity	II-17
Map II-VII Publicly Supported Housing.....	II-23
Map II-VIII Housing Burden by Race and Ethnicity.....	II-26
Map II-IX Persons with Disabilities.....	II-34
Map IV-I Licensed Residential Care Facilities in Hawthorne	IV-7
Map IV-II Transportation Lines – Principal Employers.....	IV-26
Map IV-III Transportation Lines – Public Services and Facilities	IV-27

Analysis of Impediments Figures

Figure V-I State Department of Fair Employment and Housing Cases..... V-8
Figure V-II Housing Discrimination Survey Results V-8
Figure V-III Housing Discrimination Survey Results V-9
Figure V-IV Housing Discrimination Survey Results..... V-9
Figure V-V Housing Discrimination Survey Results V-10

I. Executive Summary

A. Introduction and Background

This Analysis of Impediments to Fair Housing Choice (AI) has been prepared to accompany the City of Hawthorne’s 2020-2024 Consolidated Plan, as required by the U.S. Department of Housing and Urban Development (HUD) under federal Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) program statutes.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor. The AI examines local housing conditions, economics, policies and practices in order to ensure that housing choices and opportunities for all residents are available in an environment free from discrimination. The AI assembles fair housing information, identifies any existing impediments that limit housing choice, and proposes actions to mitigate those impediments.

Equal access to housing (housing choice) is vital to meeting essential needs and pursuing personal, educational, employment, or other goals. Recognizing this fundamental right, the City of Hawthorne is committed to addressing fair housing issues in the City and ensuring equal access to housing for all residents.

Fair Housing Laws

In an effort to end housing segregation, in 1968 the United States Congress passed the Civil Rights Act, making housing discrimination based on race, sex, national origin, religion, or ethnicity illegal. In 1988, Congress passed the Fair Housing Amendments Act¹, making housing discrimination against families with children and people with disabilities unlawful. The Fair Housing Act also sets accessibility standards for new multi-family units and requires “reasonable accommodations” for people with disabilities.

In addition to prohibiting discrimination based on federal laws, the State of California has enacted a number of statutes that mirror and, in certain cases, extend federal fair housing protections. The Unruh Civil Rights Act of 1959² and subsequent court decisions require equal access to the accommodations, advantages, facilities, privileges or services of all business establishments regardless of protected status. The courts have interpreted this Act to prohibit any arbitrary discrimination based in any class distinction, regardless of whether or not that basis is enumerated in the Act.

The Fair Employment and Housing Act of 1963³ is the primary state law, which prohibits discrimination in the sale, rental, lease negotiation, or financing of housing based on race, color, religion, sex, marital status, national origin, and ancestry. The California Fair Housing Act of 1992

¹42 U.S. Code §§ 3601 et. seq.

²California Civil Code, §§ 51 and 52

³California Government Code §§ 12900-12906

brought state laws into conformity with the Federal Fair Housing Act of 1988 and added protections for people with a "mental and physical disability" and "familial status." The Act also requires that housing providers allow disabled persons to modify their premises to meet their needs.

The Ralph Civil Rights Act of 1976 provides that all persons have the right to be free from any violence, or intimidation by threat of violence, committed against their persons or property because of their race, color, religion, ancestry, national origin, political affiliation, sexual orientation, sex, age, disability, or position in a labor dispute. The Act prohibits violence or threat of the same in rental housing situations. The Banes Civil Rights Act also forbids interference by force or threat with an individual's constitutional or statutory rights in places of worship, housing, and private property.

The Federal protected classes include:

- Disability
- Family status
- National origin
- Race
- Color
- Religion
- Sex

The additional State of California protected classes include:

- Marital status
- Medical condition
- Ancestry
- Source of income
- Age
- Sexual orientation
- Gender identity
- Gender expression
- Genetic information
- Arbitrary discrimination

This report considers impediments to fair housing choice experienced by both federal and State of California protected classes.

Defining Fair Housing and Impediments

In light of fair housing legislation passed at the federal and state levels as well as consultation with HUD and professionals providing fair housing services, the following definition of fair housing is used for this report:

Fair housing is a condition in which individuals of similar income levels in the same housing market having a like range of housing choice available to them regardless of race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.

Within the legal framework of federal and state laws and based on the guidance provided by the HUD Fair Housing Planning Guide, impediments to fair housing choice can be defined as:

Any actions, omissions, or decisions taken because of age, race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of age, race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation or any other arbitrary factor.

To affirmatively promote equal housing opportunity, a community must work to remove or mitigate identified impediments to fair housing choice. Furthermore, eligibility for the City to receive federal CDBG and HOME funds is predicated upon compliance with fair housing laws. Specifically, to receive CDBG and HOME funds from HUD, a jurisdiction must:

- Certify its commitment to actively further fair housing choice;
- Maintain fair housing records; and
- Conduct an analysis of impediments to fair housing.

The City of Hawthorne actively furthers fair housing choice through the preparation of this AI, annual funding of a fair housing service provider and active monitoring of all housing units with long-term affordability covenants to ensure that fair housing choice is a reality for all Hawthorne residents and prospective residents.

B. Methodology and Citizen Participation

The scope of this AI adheres to the recommended content and format included in Volumes 1 and 2 of the “Fair Housing Planning Guide” published by the U.S. Department of Housing and Urban Development’s Office of Fair Housing and Equal Opportunity.

Methodology

HUD requires jurisdictions that receive federal funding for community development activities to assess the status of fair housing in their community. As a recipient of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds, Hawthorne is expected to update its Analysis of Impediments to Fair Housing (last updated in 2015) and report the findings and progress in the Consolidated and Performance Evaluation Report (CAPER) submitted to HUD.

The purpose of this report is to identify impediments to fair and equal housing opportunities in Hawthorne. This AI provides an overview of the laws, regulations, conditions or other possible

obstacles that may affect access to housing and other services in Hawthorne. The scope, analysis, and format used in this AI report conform with the recommendations of the *Fair Housing Planning Guide* published by HUD.

The AI contains these six chapters:

1. *Executive Summary*. This chapter provides background on “fair housing,” methodology, citizen participation, and a summary of the findings and recommendations identified within the report.
2. *Community Characteristics*. This chapter provides a brief history of the City, a demographic profile, income profile, housing profile, special needs housing profile and key maps to provide the baseline information necessary to form a complete understanding of the City. This chapter provides a broad overview and understanding of the community so that housing needs are clearly defined.
3. *Analysis of Private Sector Impediments*. This chapter provides an overview of the private owner-occupied housing market and the renter-occupied housing market. It examines the private-sector impediments to fair housing.
4. *Analysis of Public Policy Impediments*. This chapter identifies and analyzes a range of public activities that may impede fair housing choice, including governmental land use, development regulations, and community development activities. Potential impediments to fair housing choice are discussed.
5. *Analysis of Current Fair Housing Activity*. This chapter includes the current fair housing education, enforcement and legal status of any pending cases currently underway in the City.
6. *Conclusions and Recommendations*. This chapter provides a summary of major issues and recommendations to further fair housing. This chapter also reports on progress made in implementing the prior AI. These actions are specific, with implementing timeframes.

Citizen Participation

The City values citizen input on how well city government serves its residents. The public participation effort for the 2020 AI adheres to the City’s adopted Citizen Participation Plan. To solicit public participation in the AI, the City held two Community Meetings on September 26, 2019 and October 23, 2019. The purpose of these meetings was to provide the community with background on the scope of the study and to solicit input on the most pressing issues affecting housing opportunities in Hawthorne. The City also made a Resident Survey available that included questions related to problems that citizens may have experienced in seeking or retaining housing.

Following the Community Meetings, a draft copy of the AI was prepared. The Draft AI was then finalized and made available for a 30-day public review.

C. Status of Prior Impediments and Recommendations

HUD requires the City to analyze impediments to fair housing choice that were identified in prior AIs to determine if those impediments have been resolved or if they should remain as part of the AI. The previous AI was adopted in 2015, identifying one impediment.

Impediment No. 1: Discrimination against Persons with Disabilities

The leading basis of discrimination complaints for Hawthorne, California and the United States is disabilities. Complaints on the basis of discrimination against disabled persons accounts for more than half of all fair housing complaints from Hawthorne residents to HRC each year, which is consistent with data from other cities in Southern California for the same time period studied and is consistent with data from HUD and Federal Housing Assistance Programs (FHAP) for that same time period.

2020 Status: Based on the most recent data available, discrimination against persons with disabilities continues to account for most discrimination complaints in California and across the United States. From 2014 – 2017, discrimination complaints on the basis disability accounted for 59.4 percent of all complaints submitted to HUD and continues to be the leading basis of discrimination cited by Hawthorne residents.

Disabled persons are experiencing difficulties when requesting reasonable accommodations or modifications from property owners. In particular, persons with cognitive disabilities experience significantly more problems with these accommodations and are experiencing discrimination in obtaining rental housing.

To address this, the Conclusions and Recommendations chapter calls for the City and the City’s contracted third-party fair housing service provider to expand workshops focused exclusively on the housing rights of the disabled and the responsibilities of property owners and managers with respect to reasonable accommodation. These workshops will promote greater awareness of discrimination and potential discrimination against people with disabilities and will serve to inform landlords and housing industry stakeholders about reasonable accommodations and modifications.

D. Current Impediments to Fair Housing Choice and Recommendations in Hawthorne

This 2020 AI did not identify any new impediments to fair housing choice—actions, omissions, or decisions taken because of—or which have the effect of—restricting housing choices or the availability of housing choices on the basis of age, race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor which restrict housing choices or the availability of housing choices in the City of Hawthorne.

II. Community Characteristics

A. Historical Profile

Hawthorne's first known residents were Indians of the Shoshonian linguistic group, occupying the South Bay area as early as the 1500s. Spanish explorer Juan Cabrillo caught sight of the area in October 1542, and 30 years later Sir Francis Drake sailed past the nearby coast. In 1769 title to all land in California became vested in the King of Spain, and the Southbay lands were used for the grazing of cattle. In 1822 Mexico obtained title to California from Spain. One of the ranchos subsequently formed was Sausal Redondo, named after a round clump of willows in the area. Sausal Redondo consisted of approximately 22,460 acres and included the present-day cities of El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Manhattan Beach, Playa del Rey, Redondo Beach, and Torrance.

In 1837 Governor Alvarado of Mexico granted title to Sausal Redondo to Don Antonio Avila. When California became a United States territory in 1848 and a state in 1850, disputes arose over the ownership of the rancho. Finally, in 1855 Avila was issued a U.S. Land patent for the rancho and thus became the first legal and recorded owner of the land of present-day Hawthorne.

In 1860 Sir Robert Burnett of Crathe's Castle, Scotland came to California and purchased Sausal Redondo from Avila's heirs. He expanded the sheep and cattle raising operations and planted thousands of eucalyptus, pepper, and fruit trees. Burnett returned to Scotland in 1873 and leased (with an option to buy) the rancho to Daniel Freeman, a Canadian. Freeman restocked the ranch with sheep and cattle and continued planting trees, adding more than 13,000. After the severe droughts of 1875 and 1876, during which he lost thousands of sheep and cattle, Freeman started dry farming and grew barley. By 1880 the area was producing a million bushels of barley a year. Freeman finally used his option to buy Sausal Redondo land and in 1885 received title from Sir Robert Burnett.

In 1887 several groups of investors, encouraged by the narrow-gauge railroad being built, organized several companies and purchased large amounts of towns. One of these was the Hawthorne Land Company. Hawthorne was founded by Benjamin I. Harding and Harry Dana Lombard, who in 1905 purchased acreage from the land company, thus creating the Hawthorne Improvement Company whose purpose was to build an 80-acre town site on the waving barley fields. The name of Hawthorne was chosen by Harding's daughter, Mrs. Laurine Harding Woolwine, who shared her birthday with author Nathaniel Hawthorne.

Hawthorne was advertised as the town between the city and the sea. Special appeals were made to those who wished to raise poultry and grow vegetables. Mr. and Mrs. W.J. Anderson were the first settlers and began building their house in November of 1906 at 515 Freeman Avenue. Their son, Glenn, later served as mayor of Hawthorne, Lieutenant Governor of California, and congressman from the California 17th District.

By 1907 Hawthorne had grown to a thriving little town of over 100 homes. Advertisements lauded Hawthorne as ideal for homes or investment because it was situated directly on the Redondo Electric Car Line with three (3) Stations on property which was a 30-minute ride from the heart of Los Angeles and right in line with the rapid growth of the harbor.

In its early days Hawthorne had but one grocery store, and meat was brought by wagon from Inglewood three times a week. There was a furniture factory, an overall factory, a glove factory, and an art leather firm. A small building served as both church and school. The school had 16 pupils ranging from kindergarten to 18 years of age. Mail service began in October 1908. By 1921 the population had reached 2,000, and Hawthorne was incorporated in July 1922. The area was largely settled by emigrants from the Oklahoma and Texas dustbowl.

The first census was taken in 1930 and showed 6,595 residents. In 1939 Northrop Aircraft Inc. (later Northrop Corporation and even later Northrop Grumman Corporation) moved to Hawthorne with 50 people on the payroll. Dozens of firms moved to Hawthorne to acquire Northrop subcontracts. From that time on industrial and commercial development in Hawthorne proceeded at a steady pace. Northrop and Hawthorne enjoyed a long period of prosperity and cooperation. With the growth of the aviation industry and the subsequent aerospace industry, Hawthorne became known as the Cradle of Aviation and enjoyed a boom for many years in both jobs and real estate. The City of Hawthorne has grown from a small, largely rural community to a well-rounded mixture of business, industries and homes.

B. Demographic Profile

According to the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation, “The Affirmatively Furthering Fair Housing (AFFH) rule created a standardized process for fair housing planning that program participants use to help meet their longstanding requirement to affirmatively further fair housing. As part of this process, program participants analyze data and other information to assess fair housing issues in their jurisdictions and regions.” Data provided by HUD for this demographic profile includes Decennial Census data from 1990, 2000, 2010, data from the Brown Longitudinal Tract Database (LTDB) based on decennial census data, as well as American Community Survey (ACS) 5-year estimates. These data were evaluated, along with local data and local knowledge, to conduct this A.I.

Population Trends

Tables II-I, II-II, II-III and II-IV below present demographic information and demographic trends both for the jurisdiction and the region. In terms of population growth from the period between 1990 and the present, the City of Hawthorne grew at a similar rate to the region. The region saw a population increase of 13.9 percent within the period, with the number of area residents rising from around 11.3 million to around 12.9 million. The jurisdiction saw a slightly larger growth rate, albeit by a small margin. The City of Hawthorne experienced growth of close to 15 percent within the same period, from 73,366 in 1990 to 84,273 currently. By the latest ACS estimates (2012-2018), the population has grown 19 percent from 1990 to the current year, with a population of 87,400 currently.

Age and Sex Characteristics

Table II-I below outlines the demographic information for the city of Hawthorne, while **Table II-II** outlines the demographic information for the region. **Tables II-III** and **II-VI** represent the demographic trends for the jurisdiction and the region, respectively. In keeping with the regions trend, the jurisdiction is made up mainly of individuals between the age of 18 and 64, with a little

over 65 percent of the age group making up the city of Hawthorne, while just above 64 percent of that age group makes up the region. This demographic group grew consistently across both the jurisdiction and region since 1990. Both the jurisdiction and the region saw this age group grow by about 13 percent since 1990.

The other two age groups, children under the age of 18 and individuals above the age of 65, also experienced similar growth rates in the jurisdiction and the region. In 1990, children under the age of 18 made up around 26 percent of Hawthorne's residents, compared to around 27 percent in the current year. For the region, children under the age of 18 made up around 25 percent of the population, compared to 24 percent in the current year. In terms of growth trends, the jurisdiction saw this group increase by around 21 percent since 1990, whereas the region saw an increase of only around 8 percent. Individuals over the age of 65 represent a much smaller percentage of the population, making up around 11 percent of the region and only 7 percent of the jurisdiction. While this group grew in both jurisdiction and the region, the rate of that growth was not the same. The jurisdiction saw them grow by about 18 percent, whereas the region saw growth of about 32 percent.

In terms of sex, since 1990 females have slightly outnumbered males within the jurisdiction, albeit by a slim margin. That trend has continued during the period under review, as women currently edge out men 51.63 percent to 48.37 percent, very slightly up from the 49.69 percent to 50.31 percent split in 1990. This is in keeping with the regional trend, which saw women grow from 50.06 percent of the population in 1990, to 50.67 percent in the current year.

**Table II-I
Demographics of the City of Hawthorne (Jurisdiction)**

(Hawthorne, CA CDBG, HOME) Jurisdiction			
Race/Ethnicity		#	%
White, Non-Hispanic		9,229	10.95%
Black, Non-Hispanic		21,519	25.53%
Hispanic		44,854	53.22%
Asian or Pacific Islander, Non-Hispanic		6,568	7.79%
Native American, Non-Hispanic		174	0.21%
Two or More Races, Non-Hispanic		1,534	1.82%
Other, Non-Hispanic		395	0.47%
National Origin			
#1 country of origin	Mexico	12,056	15.30%
#2 country of origin	Guatemala	2,981	3.78%
#3 country of origin	El Salvador	2,437	3.09%
#4 country of origin	Philippines	1,802	2.29%
#5 country of origin	Nigeria	898	1.14%
#6 country of origin	Peru	651	0.83%
#7 country of origin	Vietnam	569	0.72%
#8 country of origin	Colombia	506	0.64%
#9 country of origin	Nicaragua	468	0.59%
#10 country of origin	Belize	370	0.47%
Limited English Proficiency (LEP) Language			
#1 LEP Language	Spanish	15,610	19.81%
#2 LEP Language	Tagalog	799	1.01%
#3 LEP Language	Vietnamese	462	0.59%
#4 LEP Language	African	209	0.27%
#5 LEP Language	Other Pacific Island Language	166	0.21%
#6 LEP Language	Arabic	149	0.19%
#7 LEP Language	Chinese	115	0.15%
#8 LEP Language	Korean	113	0.14%
#9 LEP Language	French	104	0.13%
#10 LEP Language	Other Indic Language	102	0.13%
Disability Type			
Hearing difficulty		1,153	1.47%
Vision difficulty		1,392	1.78%
Cognitive difficulty		2,920	3.73%
Ambulatory difficulty		3,534	4.51%
Self-care difficulty		1,523	1.94%
Independent living difficulty		2,639	3.37%
Sex			
Male		40,762	48.37%
Female		43,511	51.63%
Age			
Under 18		23,070	27.38%
18-64		54,939	65.19%
65+		6,264	7.43%
Family Type			
Families with children		10,720	54.83%

Data Sources: Decennial Census; ACS

**Table II-II
Demographics of Los Angeles-Long Beach-Anaheim, CA (Region)**

(Los Angeles-Long Beach-Anaheim, CA) Region			
Race/Ethnicity		#	%
White, Non-Hispanic		4,056,820	31.62%
Black, Non-Hispanic		859,086	6.70%
Hispanic		5,700,860	44.44%
Asian or Pacific Islander, Non-Hispanic		1,888,969	14.72%
Native American, Non-Hispanic		25,102	0.20%
Two or More Races, Non-Hispanic		267,038	2.08%
Other, Non-Hispanic		30,960	0.24%
National Origin			
#1 country of origin	Mexico	1,735,902	14.34%
#2 country of origin	Philippines	288,529	2.38%
#3 country of origin	El Salvador	279,381	2.31%
#4 country of origin	Vietnam	234,251	1.93%
#5 country of origin	Korea	224,370	1.85%
#6 country of origin	Guatemala	188,854	1.56%
#7 country of origin	China excl. Hong Kong	174,424	1.44%
#8 country of origin	Iran	133,596	1.10%
#9 country of origin	Taiwan	87,643	0.72%
#10 country of origin	India	79,608	0.66%
Limited English Proficiency (LEP)			
Language			
#1 LEP Language	Spanish	2,033,088	16.79%
#2 LEP Language	Chinese	239,576	1.98%
#3 LEP Language	Korean	156,343	1.29%
#4 LEP Language	Vietnamese	147,472	1.22%
#5 LEP Language	Armenian	87,201	0.72%
#6 LEP Language	Tagalog	86,691	0.72%
#7 LEP Language	Persian	41,051	0.34%
#8 LEP Language	Japanese	32,457	0.27%
#9 LEP Language	Russian	28,358	0.23%
#10 LEP Language	Arabic	23,275	0.19%
Disability Type			
Hearing difficulty		303,390	2.52%
Vision difficulty		227,927	1.90%
Cognitive difficulty		445,175	3.70%
Ambulatory difficulty		641,347	5.34%
Self-care difficulty		312,961	2.60%
Independent living difficulty		496,105	4.13%
Sex			
Male		6,328,434	49.33%
Female		6,500,403	50.67%
Age			
Under 18		3,138,867	24.47%
18-64		8,274,594	64.50%
65+		1,415,376	11.03%
Family Type			
Families with children		1,388,564	47.84%

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details
(www.hudexchange.info/resource/4848/affh-data-documentation).

**Table II-III
Demographic Trends of Hawthorne (Jurisdiction)**

		(Hawthorne, CA CDBG, HOME) Jurisdiction							
		1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity		#	%	#	%	#	%	#	%
White, Non-Hispanic		22,470	30.60%	11,515	13.71%	9,229	10.95%	9,229	10.95%
Black, Non-Hispanic		19,219	26.18%	26,544	31.59%	22,322	26.49%	21,519	25.53%
Hispanic		23,460	31.95%	37,735	44.91%	44,854	53.22%	44,854	53.22%
Asian or Pacific Islander, Non-Hispanic		7,681	10.46%	7,149	8.51%	7,174	8.51%	6,568	7.79%
Native American, Non-Hispanic		267	0.36%	342	0.41%	273	0.32%	174	0.21%
National Origin									
Foreign-born		21,754	29.65%	28,075	33.41%	28,917	34.31%	28,565	33.90%
LEP									
Limited English Proficiency		14,701	20.04%	20,636	24.56%	20,066	23.81%	18,839	22.35%
Sex									
Male		36,456	49.69%	40,340	48.01%	40,762	48.37%	40,762	48.37%
Female		36,910	50.31%	43,689	51.99%	43,511	51.63%	43,511	51.63%
Age									
Under 18		18,989	25.88%	26,985	32.11%	23,070	27.38%	23,070	27.38%
18-64		49,066	66.88%	51,889	61.75%	54,939	65.19%	54,939	65.19%
65+		5,310	7.24%	5,154	6.13%	6,264	7.43%	6,264	7.43%
Family Type									
Families with children		9,623	55.24%	9,141	63.59%	10,720	54.83%	10,720	54.83%

Data Sources: Decennial Census; ACS.

**Table II-IV
Demographic Trends of Los Angeles-Long Beach-Anaheim, CA (Region)**

	(Los Angeles-Long Beach-Anaheim, CA) Region							
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	5,166,768	45.86%	4,417,595	35.72%	4,056,820	31.62%	4,056,820	31.62%
Black, Non-Hispanic	971,105	8.62%	1,001,103	8.10%	932,431	7.27%	859,086	6.70%
Hispanic	3,914,001	34.74%	5,117,049	41.38%	5,700,862	44.44%	5,700,860	44.44%
Asian or Pacific Islander, Non-Hispanic	1,146,691	10.18%	1,651,006	13.35%	2,046,118	15.95%	1,888,969	14.72%
Native American, Non-Hispanic	36,210	0.32%	66,029	0.53%	54,362	0.42%	25,102	0.20%
National Origin								
Foreign-born	3,469,567	30.80%	4,299,323	34.77%	4,380,850	34.15%	4,400,910	34.30%
LEP								
Limited English Proficiency	2,430,630	21.57%	3,132,663	25.33%	3,053,077	23.80%	3,020,453	23.54%
Sex								
Male	5,626,077	49.94%	6,107,286	49.39%	6,328,434	49.33%	6,328,434	49.33%
Female	5,640,051	50.06%	6,258,058	50.61%	6,500,403	50.67%	6,500,403	50.67%
Age								
Under 18	2,911,031	25.84%	3,518,245	28.45%	3,138,867	24.47%	3,138,867	24.47%
18-64	7,280,517	64.62%	7,641,369	61.80%	8,274,594	64.50%	8,274,594	64.50%
65+	1,074,580	9.54%	1,205,730	9.75%	1,415,376	11.03%	1,415,376	11.03%
Family Type								
Families with children	1,318,473	50.20%	1,143,222	53.64%	1,388,564	47.84%	1,388,564	47.84%

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Race and Ethnicity

Among other protected characteristics and classes of individuals, the Fair Housing Act prohibits housing discrimination based on race. While HUD provides data on both race and ethnicity, Hispanics of any race are considered for its purposes as a separate race/ethnic category that "can experience housing discrimination differently than other groups." Therefore, people who identify their ethnicity as Hispanic are excluded from the data provided for the other race groups – Black, Asian and Pacific Islander, Native American, and Other.

A number of generalizations can be made, based upon evaluation of the demographics and demographic trends presented in the tables above. First, the jurisdiction has slightly more Hispanic residents than the region at large. Hawthorne’s population is around 55 percent Hispanic, compared to 44 percent in the region. Second, the jurisdiction has significantly less White residents than the region (10 percent versus 31 percent). Third, the jurisdiction has significantly more Black residents than the region (25 percent versus 6 percent).

In terms of growth, the White population within the jurisdiction has followed the negative growth trend of the region (though much more substantially). Whereas the White population declined in the

region by about 21.5 percent between 1990 and the present, the jurisdiction saw a decrease of around 143 percent compared to 1990 levels. The Hispanic population, meanwhile, has grown astronomically since 1990, including a greater than 91 percent population increase among Hispanics within Hawthorne, compared to a greater than 45 percent increase in this group throughout the region.

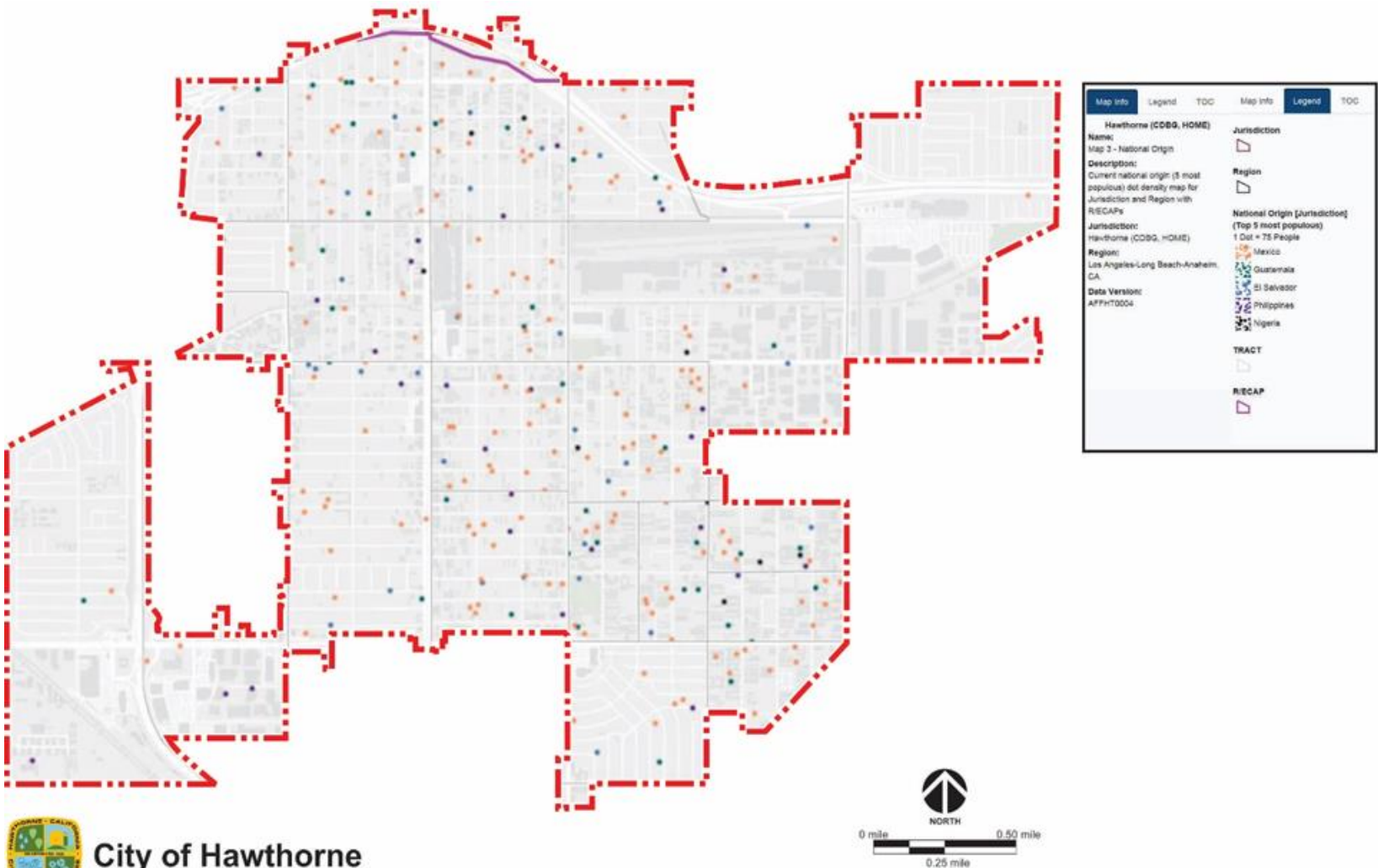
Foreign Born Population and Limited English Proficiency

In terms of national origin, the largest foreign-born population within the jurisdiction and the region is from Mexico, as both the jurisdiction and the region have around 15 percent of its population coming from Mexico. While five of the ten largest groups of foreign-born nationals are from Latin America in the region, the jurisdiction's six of the ten largest foreign-born national groups are from Latin America. The remaining four most populous non-native groups in the jurisdiction hail from the Philippines (fourth-highest), Nigeria (fifth-highest), Vietnam (seventh-highest), and Belize (tenth-highest).

These foreign-born nationals include residents who have less than a fluent mastery of the English language, and therefore need accommodation. Hawthorne residents with Limited English Proficiency (LEP) are among the largest population subgroup, having represented around 20 percent of the population in 1990 while comprising around 22 percent of current residents. This is in line with the regional average, as such residents comprised around 21 percent of the region in 1990 and around 23 percent of the region currently.

One issue that arises from such a demographic breakdown is the potential for residents to face barriers related to language proficiency. In order to visualize such an issue, consider the information detailed by **Map II-I, Map II-II, Map II-III**. Within the jurisdiction, there exists a good deal of residents who are primarily Spanish speakers and have recently immigrated from a Latin American or Asian country. In areas heavily populated by such residents, the school proficiency is generally low. These two issues combine to create a difficult situation for both first-generation children, as well as immigrants, who are attempting to assimilate into the jurisdiction as their ability to access institutions that can help them learn English is extremely limited.

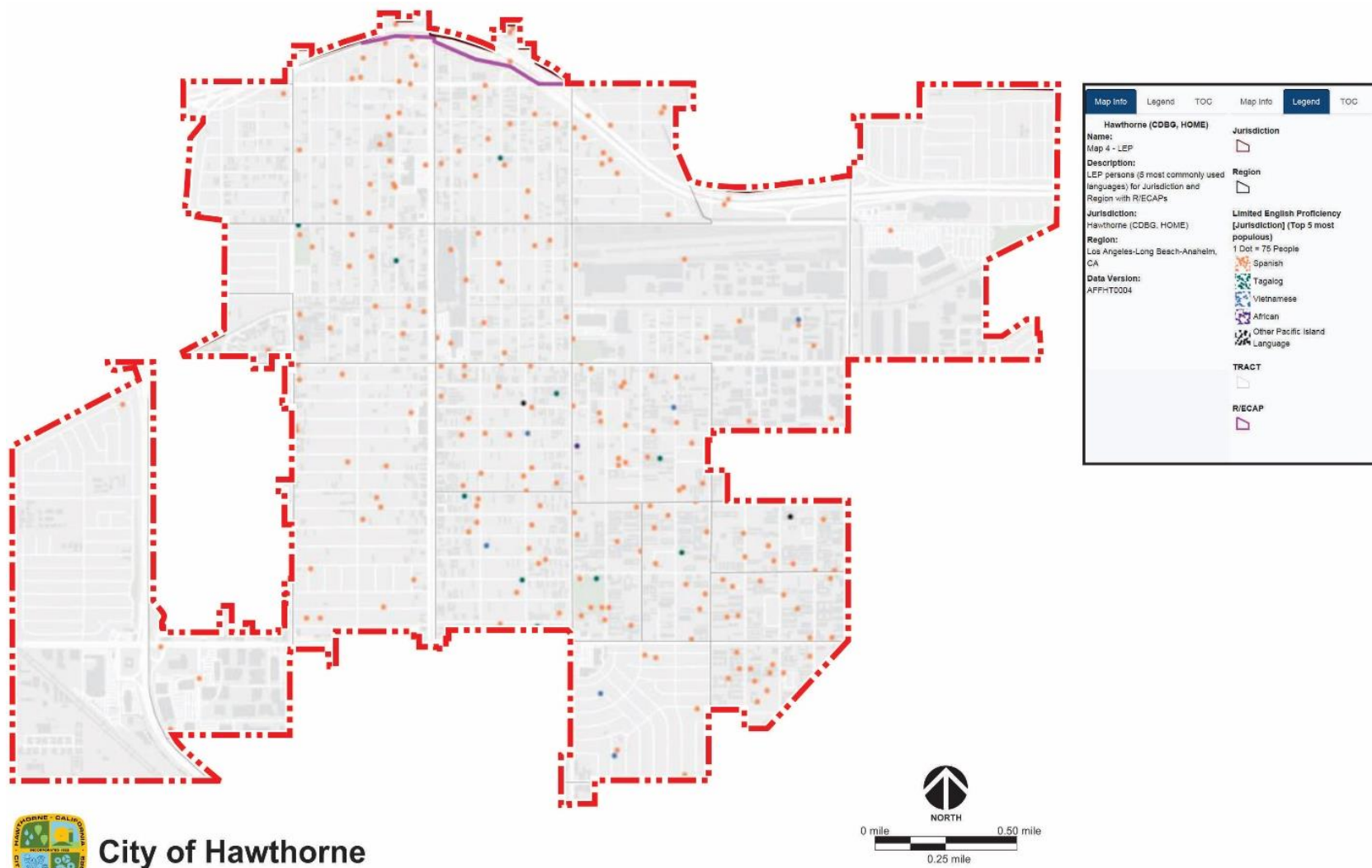
Map II-I National Origin



City of Hawthorne

Data Source: *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)*, U.S. Department of Housing and Urban Development, November 2017.

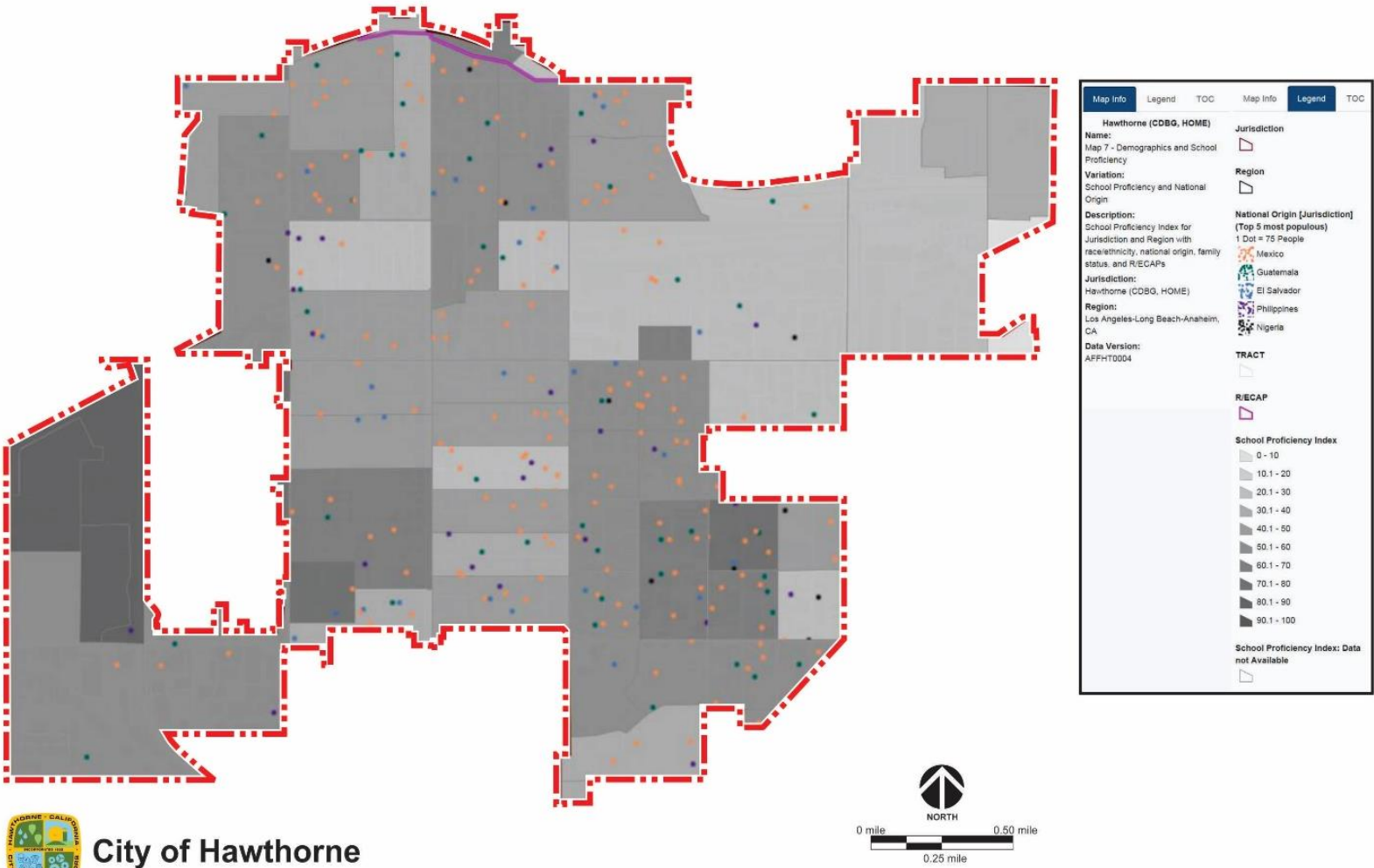
Map II-II
Limited English Proficiency



City of Hawthorne

Data Source: *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)*, U.S. Department of Housing and Urban Development, November 2017.

Map II-III School Proficiency



City of Hawthorne

Data Source: *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)*, U.S. Department of Housing and Urban Development, November 2017.

Racial and Ethnic Integration

HUD has developed a series of indices to help inform communities about segregation and disparities in access to opportunity in their jurisdiction and region. With respect to racial and ethnic background and the extent to which a community is integrated or segregated, HUD provides the Dissimilarity Index.

Dissimilarity Index

According to HUD, “The dissimilarity index (or the index of dissimilarity) is a commonly used measure of community-level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. The values of the dissimilarity index range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question, and a value of 100 representing perfect segregation between the racial groups.” (AFFH - T)

The City of Hawthorne’s Racial/Ethnic Dissimilarity Index shown below in **Table II-V** compares extremely favorably to the region in terms of absolute values, meaning that Hawthorne is significantly more integrated than the region overall in each of the four comparisons shown in **Table II-V**.

However, an examination of overall trends reveals a different picture. In every category, the City is trending in the direction of more, not less, segregation at a rate that is significantly higher than that of the region overall. With respect to Non-Whites, the level of segregation from Whites, as measured by the Dissimilarity Index, has increased by over 48 percent since 1990. By contrast, although Hawthorne is less segregated than the region according to the Dissimilarity Index, the regional level of Non-White/White segregation has only increased by slightly under 3 percent during the same period. This trend is equally pronounced for Hispanic residents, as well as Asian and Pacific Islander residents, as they have experienced increased segregation by around 52 and 48 percent respectively, compared to 5 percent and 9 percent respectively in the region. While Black residents have experienced the smallest increase of any racial group, 35 percent, that number is still well about the regional trend. In the region, the Black/White dissimilarity index actually decreased about 5 percent from 1990 to the present.

The relative degree of integration within the City is shown in **Map II-IV** on the following pages, wherein concentrations of dots represent various racial/ethnic groups. Each racial or ethnic group is relatively evenly distributed among the Census Tracts that include population centers. Each dot represents 75 people. To compare these trends over time, **Map II-V** shows the same data, but for the year 2010.

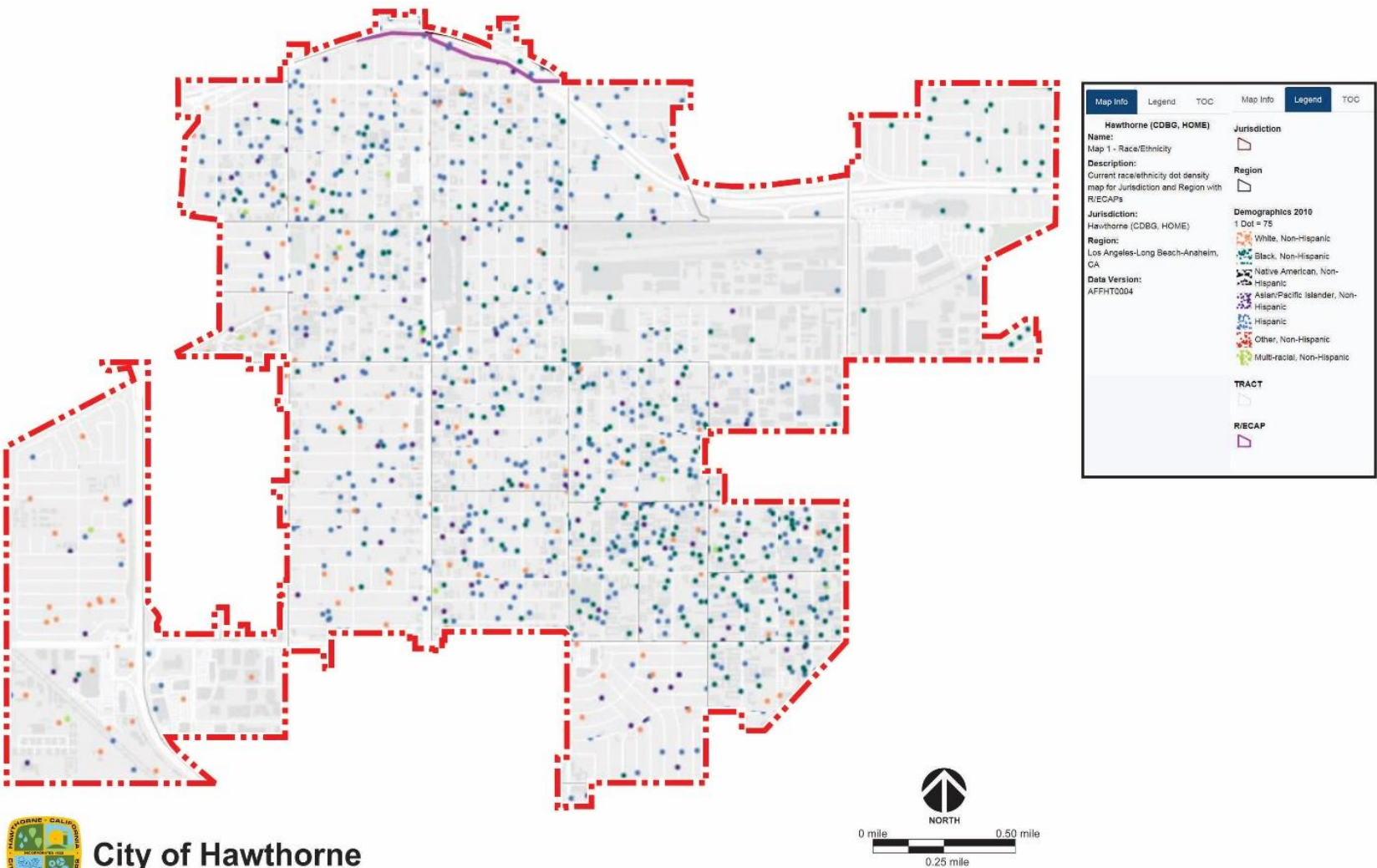
**Table II-V
Racial/Ethnic Dissimilarity Trends**

	(Hawthorne, CA CDBG, HOME) Jurisdiction				(Los Angeles-Long Beach-Anaheim, CA) Region			
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	27.32	39.77	40.75	40.38	55.32	55.50	54.64	56.94
Black/White	38.21	49.70	51.99	51.83	72.75	68.12	65.22	68.85
Hispanic/White	25.01	36.65	38.70	38.08	60.12	62.44	62.15	63.49
Asian or Pacific Islander/White	19.24	25.88	25.46	28.56	43.46	46.02	45.77	49.78

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

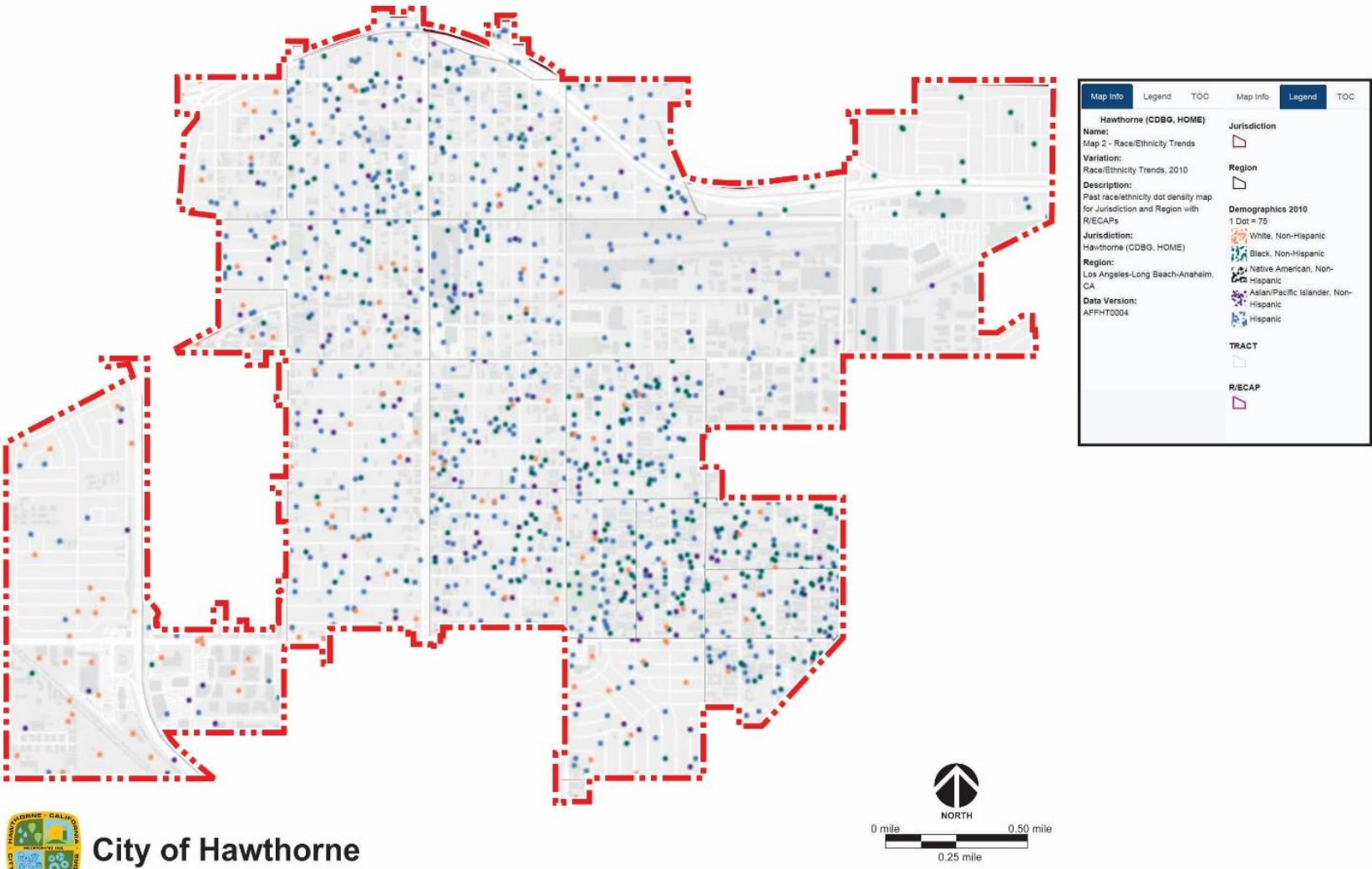
Map II-IV Race/Ethnicity



City of Hawthorne

Data Source: *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)*, U.S. Department of Housing and Urban Development, November 2017.

Map II-V Race/Ethnicity Trends



City of Hawthorne

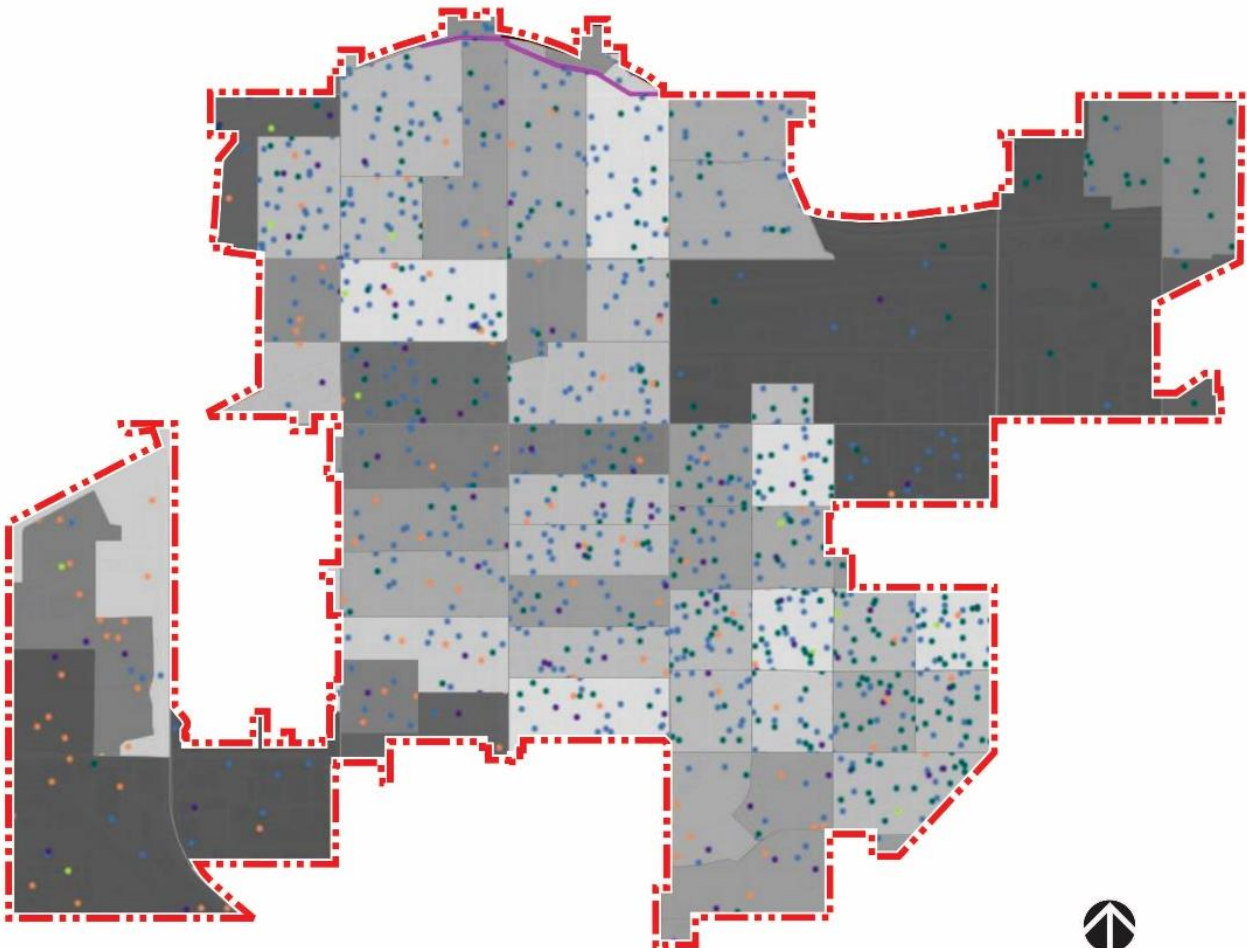
Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

C. Income Profile

Map II-VI shows the intersection of demographics and job proximity. Each dot represents 75 residents of a given ethnic or racial group living in the area, while the shading represents the score of the area on the job proximity index. The lighter shaded Census Tracts on the map represent areas of the City that are located further away from job locations and employment centers.

Considering this, in areas heavily populated by non-White residents, it often is very difficult for them to find a nearby job. In each of the lightest areas on the map, there exists clusters of non-White residents, particularly Hispanic residents. There are, however, very few White residents in these lightly shaded areas, though some do exist. This demonstrates that, while the issue isn't as pervasive for White residents, there are a good deal of White residents are similarly struggling to find work. The following section will further discuss whether this problem is unique to Hawthorne, or if it is a problem seen throughout the region.

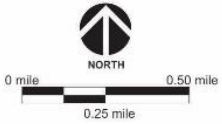
Map II-VI Demographics and Job Proximity



Map Info	Legend	TOC	Map Info	Legend	TOC
Hawthorne (CDBG, HOME) Name: Map 8 - Demographics and Job Proximity Variation: Job Proximity and Race/Ethnicity Description: Jobs Proximity Index for Jurisdiction and Region with race/ethnicity, national origin, family status and R/ECAPs Jurisdiction: Hawthorne (CDBG, HOME) Region: Los Angeles-Long Beach-Anaheim, CA Data Version: AFFHT0004			Jurisdiction <input type="checkbox"/> Region <input type="checkbox"/> Demographics 2010 1 Dot = 75 <input type="checkbox"/> White, Non-Hispanic <input type="checkbox"/> Black, Non-Hispanic <input type="checkbox"/> Native American, Non-Hispanic <input type="checkbox"/> Asian/Pacific Islander, Non-Hispanic <input type="checkbox"/> Hispanic <input type="checkbox"/> Other, Non-Hispanic <input type="checkbox"/> Multi-racial, Non-Hispanic TRACT <input type="checkbox"/> R/ECAP <input checked="" type="checkbox"/>		
Jobs Proximity Index <input type="checkbox"/> 0 - 10 <input type="checkbox"/> 10.1 - 20 <input type="checkbox"/> 20.1 - 30 <input type="checkbox"/> 30.1 - 40 <input type="checkbox"/> 40.1 - 50 <input type="checkbox"/> 50.1 - 60 <input type="checkbox"/> 60.1 - 70 <input type="checkbox"/> 70.1 - 80 <input type="checkbox"/> 80.1 - 90 <input type="checkbox"/> 90.1 - 100 Jobs Proximity Index: Data not Available <input type="checkbox"/>					



City of Hawthorne



In order to further understand the implications for this demographic breakdown, it is useful to look at the Racially or Ethnically Concentrated Areas of Poverty (R/ECAP areas). These areas are defined as census tracts where more than half the population is non-White and 40 percent or more of the population is in poverty or where the poverty rate is greater than three times the average poverty rate in the area. **Table II-VI** and **Table II-VII** detail the demographic makeup of R/ECAP areas in the jurisdiction and the region, respectively.

In terms of the populations within R/ECAP areas, Hawthorne has less of its population in such areas when compared to the region (under 1 percent versus 4 percent). The demographic makeup of these areas is also very similar. Close to 70 percent of the populations in R/ECAP areas are Hispanic within the region, while nearly 91 percent of residents within these areas in Hawthorne are Hispanic. The inverse is true for White populations, however, as 6 percent of residents in R/ECAP areas in the region are White, whereas only 1 percent are White within Hawthorne.

Hawthorne also is similar to the region when looking at the percentage of families within R/ECAP areas, as well as these resident's national origin. The jurisdiction and the region have a similar percentage of residents within R/ECAP areas being members of family, 20 percent versus 19 percent. The national origin of R/ECAP residents is also similar between the two, mostly owing to the larger Hispanic population present in the jurisdiction. Both the jurisdiction and the region's R/ECAP areas are largely populated by residents from Latin American countries. The jurisdiction's R/ECAP area only has 1 percent of its population from a non-Latin American country, whereas the region has nearly 4 percent of its residents from a non-Latin American country.

**Table II-VI
R/ECAP Demographics for Hawthorne**

	(Hawthorne, CA CDBG, HOME) Jurisdiction		
R/ECAP Race/Ethnicity		#	%
Total Population in R/ECAPs		169	-
White, Non-Hispanic		3	1.78%
Black, Non-Hispanic		8	4.73%
Hispanic		154	91.12%
Asian or Pacific Islander, Non-Hispanic		3	1.78%
Native American, Non-Hispanic		0	0.00%
Other, Non-Hispanic		0	0.00%
R/ECAP Family Type			
Total Families in R/ECAPs		34	-
Families with children		22	64.71%
R/ECAP National Origin			
Total Population in R/ECAPs		169	-
#1 country of origin	Mexico	49	29.15%
#2 country of origin	Guatemala	11	6.73%
#3 country of origin	El Salvador	8	4.45%
#4 country of origin	Pakistan	2	1.08%
#5 country of origin	Ecuador	2	0.97%
#6 country of origin	Honduras	1	0.66%
#7 country of origin	Brazil	1	0.35%
#8 country of origin	Null	0	0.00%
#9 country of origin	Null	0	0.00%
#10 country of origin	Null	0	0.00%

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 2: Data Sources: Decennial Census; ACS.

Note 3: Refer to the Data Documentation for details
(www.hudexchange.info/resource/4848/affh-data-documentation).

**Table II-VII
R/ECAP Demographics for Region**

	(Los Angeles-Long Beach- Anaheim, CA) Region		
R/ECAP Race/Ethnicity		#	%
Total Population in R/ECAPs		562,051	-
White, Non-Hispanic		34,911	6.21%
Black, Non-Hispanic		77,656	13.82%
Hispanic		395,944	70.45%
Asian or Pacific Islander, Non-Hispanic		44,800	7.97%
Native American, Non-Hispanic		1,043	0.19%
Other, Non-Hispanic		1,455	0.26%
R/ECAP Family Type			
Total Families in R/ECAPs		104,826	-
Families with children		64,580	61.61%
R/ECAP National Origin			
Total Population in R/ECAPs		562,051	-
#1 country of origin	Mexico	138,110	24.57%
#2 country of origin	El Salvador	29,075	5.17%
#3 country of origin	Guatemala	22,964	4.09%
#4 country of origin	China excl. I	6,958	1.24%
#5 country of origin	Korea	5,496	0.98%
#6 country of origin	Honduras	5,221	0.93%
#7 country of origin	Philippines	3,592	0.64%
#8 country of origin	Cambodia	3,378	0.60%
#9 country of origin	Vietnam	2,828	0.50%
#10 country of origin	Belize	2,199	0.39%

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 2: Data Sources: Decennial Census; ACS.

Note 3: Refer to the Data Documentation for details

(www.hudexchange.info/resource/4848/affh-data-documentation).

D. Housing Profile

Public Housing

Following the trends seen in the previous section, the city of Hawthorne faces unique housing issues when compared with the region. Starting with the public housing provided by the jurisdiction, **Table II-VIII** shows that public housing represents a very small percentage of the overall housing in the city. Less than 3 percent of all houses are publicly supported, with the two publicly supported housing options being Project-based Section 8 housing, and HCV Program housing.

However, when looking at **Table II-IX** the jurisdiction's limited public housing has a generally similar demographic make-up than that of the region. Percentages for each ethnic and racial group are generally the same between the jurisdiction and the region. The notable exception is the disparity between Black and White residents. While the region sees over 41 percent of its public housing occupied by White residents, the jurisdiction only has about 14 percent of its public housing occupied by such residents. Black residents, however, make up a significantly larger percentage of the jurisdiction's public housing compared to the region, 33 percent versus 8 percent. Further information regarding public housing can be seen below in **Map II-VII**. This map details the locations of the public housing in the jurisdiction. It is important to note that the locations of the jurisdiction's public housing are largely concentrated in low income areas and are generally near transit services.

Table II-VIII
Publicly Supported Houses by Program Category

Housing Units	(Hawthorne, CA CDBG, HOME) Jurisdiction	
	#	%
Total housing units	29,938	-
Public Housing	N/a	N/a
Project-based Section 8	149	0.50%
Other Multifamily	N/a	N/a
HCV Program	689	2.30%

Note 1: Data Sources: Decennial Census; APSH

Note 2: Refer to the Data Documentation for details

(www.hudexchange.info/resource/4848/affh-data-documentation).

**Table II-IX
Publicly Supported Houses by Race and Ethnicity**

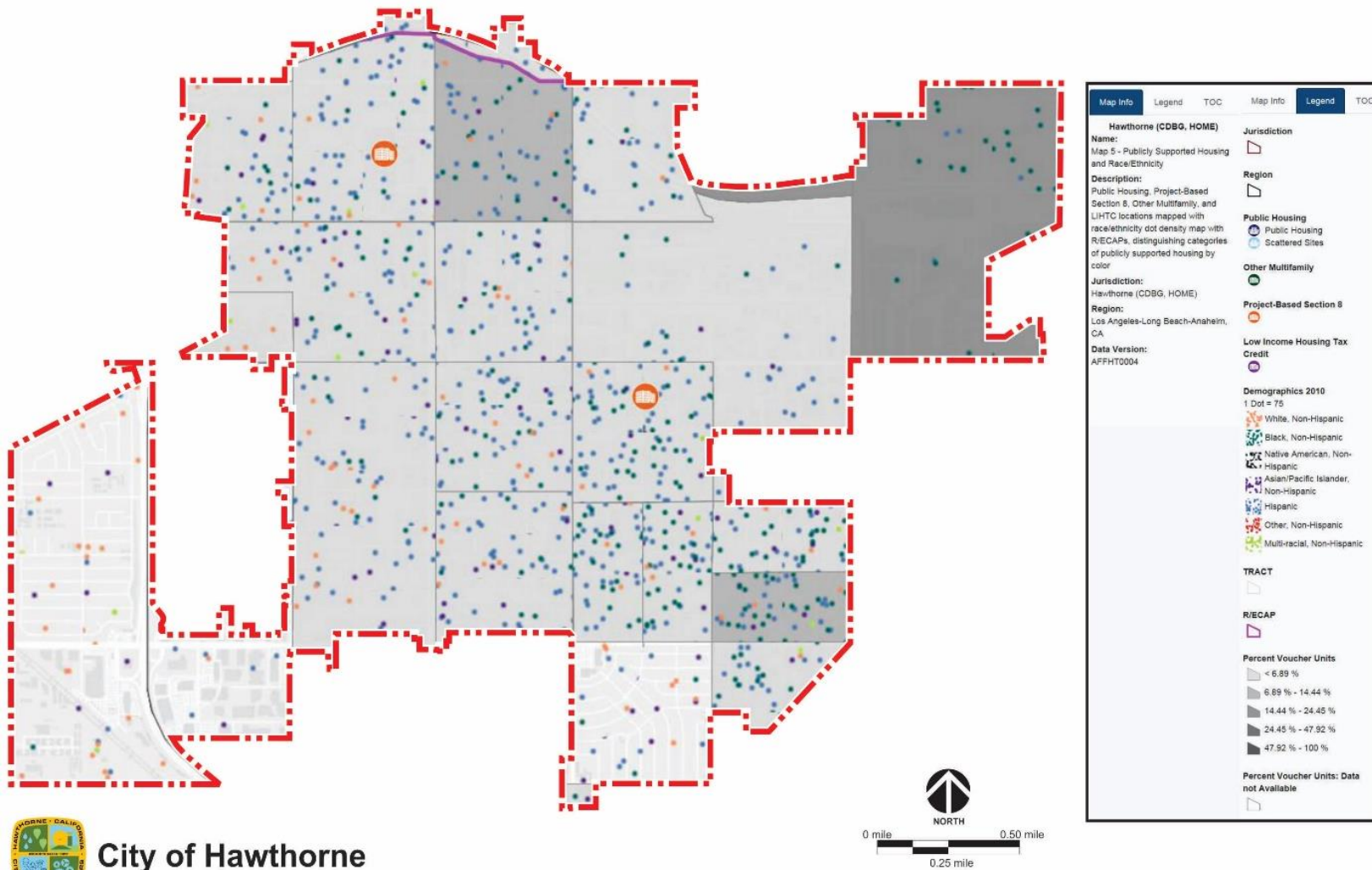
(Hawthorne, CA CDBG, HOME) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Housing Type								
Public Housing	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	18	12.41%	23	15.86%	99	68.28%	5	3.45%
Other Multifamily	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
HCV Program	44	5.17%	659	77.44%	126	14.81%	21	2.47%
Total Households	4,190	14.64%	9,585	33.49%	11,875	41.49%	1,945	6.80%
0-30% of AMI	350	6.41%	2,100	38.46%	2,570	47.07%	185	3.39%
0-50% of AMI	730	6.72%	3,820	35.16%	5,195	47.81%	520	4.79%
0-80% of AMI	1,615	9.22%	6,105	34.86%	8,175	46.67%	870	4.97%
(Los Angeles-Long Beach-Anaheim, CA) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	683	6.99%	2,627	26.90%	6,110	62.56%	344	3.52%
Project-Based Section 8	9,154	23.86%	6,942	18.10%	10,365	27.02%	11,753	30.64%
Other Multifamily	1,707	33.38%	465	9.09%	1,094	21.39%	1,839	35.96%
HCV Program	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Total Households	1,766,510	41.80%	333,080	7.88%	1,405,070	33.25%	629,349	14.89%
0-30% of AMI	215,775	29.59%	86,225	11.83%	305,885	41.95%	105,314	14.44%
0-50% of AMI	343,565	26.07%	135,740	10.30%	587,685	44.60%	175,814	13.34%
0-80% of AMI	590,895	28.77%	195,155	9.50%	905,370	44.09%	272,549	13.27%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: Numbers presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Map II-VII Publicly Supported Housing



Housing Problems

The AFFH-T Data Documentation states the following: “To assist communities in describing and identifying disproportionate housing needs in their jurisdictions and regions, the AFFH-T provides data identifying instances where housing problems or severe housing problems exist. The AFFH-T presents housing problems overall, as well as variations by race/ethnicity, household type and household size.”

The AFFH-T provides data on the number and share of households with one of the following four housing problems:

1. Lacks complete kitchen facilities: Household lacks a sink with piped water, a range or stove, or a refrigerator.
2. Lacks complete plumbing facilities: Household lacks hot and cold piped water, a flush toilet and a bathtub or shower.
3. Overcrowding: A household is considered overcrowded if there are more than 1.01 people per room.
4. Cost Burden: A household is considered cost burdened if the household pays more than 30 percent of its total gross income for housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.

Additionally, the AFFH-T provides data on the number and share of households with one or more of the following “severe” housing problems, defined as:

1. Lacks complete kitchen facilities: Household does not have a stove/oven and refrigerator.
2. Lacks complete plumbing facilities: Household does not have running water or modern toilets.
3. Severe Overcrowding: A household is considered severely overcrowded if there are more than 1.5 people per room.
4. Severe Cost Burden: A household is considered severely cost burdened if the household pays more than 50 percent of its total income for housing costs.

According to the data in **Table II-X** and **Map II-VIII** below, the total number of households within the jurisdiction is 28,620. Of those households, 16,630, or 58 percent, experience housing problems. Among those households experiencing problems, 11,230, or 39 percent of the total, experience severe housing problems. These percentages are almost identical to the regional average, wherein the incidences of housing problems and severe housing problems are 52.95 percent and 33.17 percent respectively. Additionally, as is true in the region, Hispanic households within the jurisdiction experience housing problems and severe housing problems at higher rates than the average. Almost 68 percent of Hispanic households experience housing problems, while 50 percent experience severe housing problems. Two other groups experiencing significantly larger housing problems in the jurisdiction are Black residents and Native American residents. In the jurisdiction, Native American residents experience problems at a rate of 51 percent, which is similar to the rate of housing problems experienced by Black residents, which is 56 percent.

**Table II-X
Demographics of Houses with Disproportionate Housing Needs**

Disproportionate Housing Needs	(Hawthorne, CA CDBG, HOME) Jurisdiction			(Los Angeles-Long Beach-Anaheim, CA) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	1,715	4,190	40.93%	755,745	1,766,510	42.78%
Black, Non-Hispanic	5,355	9,585	55.87%	192,655	333,080	57.84%
Hispanic	7,995	11,875	67.33%	929,985	1,405,070	66.19%
Asian or Pacific Islander, Non-Hispanic	1,070	1,945	55.01%	312,065	629,349	49.59%
Native American, Non-Hispanic	0	25	0.00%	4,990	9,520	52.42%
Other, Non-Hispanic	515	1,010	50.99%	42,365	82,340	51.45%
Total	16,630	28,620	58.11%	2,237,810	4,225,895	52.95%
Household Type and Size						
Family households, <5 people	8,320	14,820	56.14%	1,061,155	2,236,590	47.45%
Family households, 5+ people	3,615	4,395	82.25%	472,725	646,795	73.09%
Non-family households	4,695	9,400	49.95%	703,940	1,342,510	52.43%
Households experiencing any of 4 Severe Housing Problems						
	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	984	4,190	23.48%	404,505	1,766,510	22.90%
Black, Non-Hispanic	3,340	9,585	34.85%	118,350	333,080	35.53%
Hispanic	5,920	11,875	49.85%	663,905	1,405,070	47.25%
Asian or Pacific Islander, Non-Hispanic	675	1,945	34.70%	187,450	629,349	29.78%
Native American, Non-Hispanic	0	25	0.00%	2,818	9,520	29.60%
Other, Non-Hispanic	310	1,010	30.69%	24,670	82,340	29.96%
Total	11,230	28,620	39.24%	1,401,660	4,225,895	33.17%

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

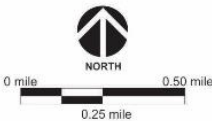
Note 3: Data Sources: CHAS

Note 4: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Map II-VIII Housing Burden by Race and Ethnicity



City of Hawthorne



Data Source: *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)*, U.S. Department of Housing and Urban Development, November 2017.

Complementing these numbers is the information regarding households with severe housing cost burdens, which is shown in **Table II-XI**. HUD defines a severe housing cost-burden as any home which must spend over 30 percent of their income on housing, such that paying for may have difficulty affording necessities such as food, clothing, transportation, and medical care. With the exception of Other, Non-Hispanic households, Hawthorne either out-performs, or is in line with, the region for every ethnic group and household type. For such households, the 28 percent experiencing severe housing cost burdens is slightly above the regional average (24 percent).

**Table II-XI
Demographics of Households with Severe Housing Cost Burdens**

Households with Severe Housing Cost Burden	(Hawthorne, CA CDBG, HOME) Jurisdiction			(Los Angeles-Long Beach-Anaheim, CA) Region		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	690	4,190	16.47%	363,575	1,766,510	20.58%
Black, Non-Hispanic	2,505	9,585	26.13%	100,510	333,080	30.18%
Hispanic	3,365	11,875	28.34%	393,495	1,405,070	28.01%
Asian or Pacific Islander, Non-Hispanic	295	1,945	15.17%	135,840	629,349	21.58%
Native American, Non-Hispanic	0	25	0.00%	2,210	9,520	23.21%
Other, Non-Hispanic	285	1,010	28.22%	20,445	82,340	24.83%
Total	7,140	28,620	24.95%	1,016,075	4,225,895	24.04%
Household Type and Size						
Family households, <5 people	3,594	14,820	24.25%	499,320	2,236,590	22.33%
Family households, 5+ people	894	4,395	20.34%	136,540	646,795	21.11%
Non-family households	2,639	9,400	28.07%	380,210	1,342,510	28.32%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Source: CHAS

Note 5: Refer to the Data Documentation for details

(www.hudexchange.info/resource/4848/affh-data-documentation).

Opportunity Indices

Table II-XII contains seven opportunity indices: environmental health, low poverty index, school proficiency index, labor market index, transit index, low transportation index, and the job proximity index. What follows is a summary of each of the jurisdiction’s scores for these various indices as compared to the region’s scores.

Environmental Health Index

According to HUD, “The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level.” The Index combines standardized EPA estimates of air quality carcinogenic, respiratory and neurological hazards with indexing census tracts. Values are inverted and then percentile ranked nationally. Values range from 0 to 100: the higher the index value, the

less exposure to toxins harmful to human health; or, put differently, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census tract.

The EPA standardizes its estimates of air quality hazards using the National Air Toxics Assessment (NATA), which is EPA's ongoing review of air toxics in the United States. EPA developed NATA as a screening tool for state, local and tribal air agencies. NATA's results help these local agencies identify which pollutants, emission sources and places they may wish to study further to better understand any possible risks to public health from air toxics. EPA suggests that local communities use NATA to “prioritize pollutants and emission source types; identify places of interest for further study; get a starting point for local assessments; focus community efforts; inform monitoring programs.” According to EPA, communities have found that using NATA helps “inform and empower citizens to make local decisions about their community’s health. Local projects often improve air quality faster than federal regulations alone.”

Although EPA characterizes NATA results as “a snapshot of outdoor air quality with respect to emissions of air toxics,” it nonetheless suggests long-term risks to human health if air toxics emissions are steady over time, including estimates of the cancer risks from breathing air toxics over many years. It also estimates non-cancer health effects for some pollutants, including diesel particulate matter (PM). It is important to note that NATA only includes outdoor sources of pollutants, and its estimates of risk “assume a person breathes these emissions each year over a lifetime (or approximately 70 years). NATA only considers health effects from breathing these air toxics. It ignores indoor hazards, contacting or ingesting toxics, and any other ways people might be exposed.” (<http://www.epa.gov/national-air-toxics-assessment/nata-overviewepa.gov>)

Table II-XII presents the Environmental Health Index values for various groups within Hawthorne and within the region at large. Across every category, including those results reported for communities below the federal poverty level, Hawthorne scores are well below the regional averages.

Hawthorne shows low environmental index scores across the board, regardless of the race or income of the individual. The highest score on the index is for White residents, with a score of 3.16, which is below the regional average of 25.76. The scores for the other ethnic and racial groups are all similarly low. Of particular note is the disparity between the jurisdiction’s average and the region’s average for Native American residents. The jurisdiction’s average of 2.11 is significantly lower than the regional average of 21.67. The disparity for each racial and ethnic group is magnified when looking at residents who live under the poverty line. The highest score for the jurisdiction (2.75 for Black residents) is still well below the lowest score for the region (11.76 for Hispanic residents).

According to HUD, the low poverty index captures poverty in a given neighborhood or jurisdiction. The index considers the overall poverty rate of the area, and then converts that rate into a number between 0 and 100. The higher the score, the lower the area’s exposure to poverty is. The jurisdiction’s score for each category is below the region’s average. This represents a much higher exposure to poverty in the jurisdiction. Of particular note is the higher exposure that Asian or Pacific Islander residents have in the jurisdiction, as the city’s score of 40.89 is well below the regional score of 55.68.

The school proficiency index uses test scores from fourth grade students to determine whether neighborhoods have high-performing, or low-performing, elementary schools. The higher the score, the higher the quality of elementary schools in the area. Compared to regional averages, the

jurisdiction is performing below the regional average, with two exceptions. The first difference is the score for Black residents, wherein the jurisdiction's score of 49.34 is above the regional score of 35.61. The second difference is for Hispanic residents, where the jurisdiction's score of 49.29 is above the regional average of 39.67.

The labor market index is meant to convey the general strength of human capital and labor market engagement in a given area. Three factors determine an area's score for this index: the unemployment rate, the labor market participation rate (the total number of workers employed divided by the working age population), and the educational attainment of the census tract (percent with a bachelor's degree). The higher the score, the higher labor market engagement is. Compared to the regional scores, the jurisdiction is, on average, performing slightly below the expected labor market engagement. The main difference lies in the scores of White and Asian or Pacific Islander residents. White residents have a score of 52.60 in the jurisdiction compared to 67.34 regionally. Asian or Pacific Islander residents have a score of 44.75 in the jurisdiction compared to 57.42 regionally.

The transit index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the score, the more likely residents are to utilize public transportation. For this index, the jurisdiction is outperforming the region. The jurisdiction scores higher on the index for every racial group, even when considering residents below the poverty line (with the exception of Native American residents below the poverty line). More importantly, use of transit is relatively consistent across each racial group, suggesting that there does not exist a racial disparity in resident's reliance on, or use of, public transit.

The low transportation cost index is based on estimates of transportation expenses for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region (i.e. CBSA). The higher the score, the lower the transportation cost for an area is. As it did for the transit index, the jurisdiction is again outperforming the region. The high scores for both these indices suggests that the jurisdiction's residents are using the public transit available to them and that said public transit is relatively affordable.

The final index, job proximity index, quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. The higher the score, the better access to employment opportunities is for a given area. The jurisdiction is again under-performing compared to the region for this index. Every group has a lower score in the jurisdiction than the regional average. The biggest difference lies in the score for Black residents, wherein the jurisdiction average of 31.96 is well below the regional average of 46.12.

Table II-XII
Opportunity Indicators by Race/Ethnicity

(Downey, CA CDBG, HOME) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	59.72	35.30	46.16	79.36	83.34	54.00	8.66
Black, Non-Hispanic	52.14	35.79	41.79	80.46	85.26	53.58	8.34
Hispanic	55.81	35.31	44.41	79.85	84.06	52.11	8.42
Asian or Pacific Islander, Non-Hispanic	58.79	35.19	47.00	80.06	83.89	52.46	8.48
Native American, Non-Hispanic	54.47	34.32	42.93	80.32	84.61	50.62	8.19
Population below federal poverty line							
White, Non-Hispanic	58.26	33.71	45.36	80.18	84.09	52.30	8.17
Black, Non-Hispanic	41.70	34.10	35.72	81.44	88.39	63.51	7.41
Hispanic	46.41	35.27	39.40	80.17	85.00	55.00	8.37
Asian or Pacific Islander, Non-Hispanic	48.03	29.65	45.76	82.38	86.76	59.03	8.17
Native American, Non-Hispanic	N/a	N/a	N/a	N/a	N/a	N/a	N/a
(Los Angeles-Long Beach-Anaheim, CA) Region							
Total Population							
White, Non-Hispanic	65.34	68.72	67.34	76.59	79.87	46.74	25.76
Black, Non-Hispanic	36.77	35.61	36.13	81.34	83.42	46.12	13.85
Hispanic	36.01	39.67	35.43	80.65	83.98	43.16	14.60
Asian or Pacific Islander, Non-Hispanic	55.68	62.51	57.42	78.82	82.35	45.30	17.44
Native American, Non-Hispanic	48.97	50.86	48.40	78.04	81.53	44.84	21.67
Population below federal poverty line							
White, Non-Hispanic	53.04	61.67	59.07	80.43	84.23	48.46	20.26
Black, Non-Hispanic	23.71	28.40	26.45	83.34	85.48	44.58	12.70
Hispanic	24.25	33.59	28.83	83.28	86.96	43.89	11.76
Asian or Pacific Islander, Non-Hispanic	45.15	57.07	50.53	82.27	86.69	47.52	13.85
Native American, Non-Hispanic	32.13	37.36	34.86	80.82	84.18	47.51	19.09

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

E. Special Housing Needs Profile

Certain residents have more difficulty finding decent and affordable housing or receiving fair housing treatment due to special circumstances. These circumstances may include employment and income, family type, disability, or other characteristics. Hawthorne officials should consider addressing the needs of certain racial/ethnic groups, who make up a growing demographic that experiences cost burden and other housing problems disproportionately, in addition to other fair housing issues. Seniors are another burgeoning population sector with similar issues. Single parent households, especially those headed by women, are growing in number and may need special accommodation. Other groups facing challenges include people with disabilities, large families, persons with limited English proficiency, and currently and formerly homeless persons.

Table II-XIII summarizes the proportions of special needs groups in Hawthorne. The following discussion describes and analyzes the housing needs of each group. Data are from the 2010 Census, the Brown Longitudinal Tract Database (LTDB) based on the census, and the 2009-2013 and 2012-2016 American Community Surveys (ACS).

**Table II-XIII
Disability by Type**

	(Hawthorne, CA CDBG, HOME) Jurisdiction		(Los Angeles-Long Beach- Anaheim, CA) Region	
Disability Type	#	%	#	%
Hearing difficulty	1,153	1.47%	303,390	2.52%
Vision difficulty	1,392	1.78%	227,927	1.90%
Cognitive difficulty	2,920	3.73%	445,175	3.70%
Ambulatory difficulty	3,534	4.51%	641,347	5.34%
Self-care difficulty	1,523	1.94%	312,961	2.60%
Independent living difficulty	2,639	3.37%	496,105	4.13%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Senior Citizens

According to recent estimates, around 7 percent of Hawthorne's residents were seniors, defined as persons age 65 or older. This statistic represents an increase of around 18 percent since 1990. As such, seniors comprise a significant contingent of Hawthorne's residents, who need accommodation in the area of housing, due to limited income and higher disability rates, including ambulatory and other disabilities that require significant retrofitting of housing units.

In terms of disabilities, under 1 percent of City residents between the ages of 5 and 7 have disabilities. As shown in **Table II-XIV** below, there are similar numbers of persons with disabilities within the age ranges of 18 to 64, and 65 and above. The 3,419 persons aged 18 to 64 who have a disability represent around 6 percent of the 54,939 residents of that population group. Seniors with a disability make up a much larger portion of that sub-group, as the 2,357 seniors with a disability represent around 37 percent of the 6,264 seniors in the jurisdiction.

Table II-XIV
Disability by Age Group

	(Hawthorne, CA CDBG, HOME) Jurisdiction		(Los Angeles-Long Beach-Anaheim, CA) Region	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	827	1.06%	78,882	0.66%
age 18-64 with Disabilities	3,419	4.36%	556,100	4.63%
age 65+ with Disabilities	2,357	3.01%	527,738	4.39%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

People with Disabilities

The Fair Housing Act prohibits housing discrimination against any person based on disability. The Americans with Disabilities Act defines a disability as a “physical or mental impairment that substantially limits one or more major life activities.” People with disabilities have special housing needs because of their fixed income, higher health costs, and need for accessible and affordable housing.

Table II-XIV reveals that that the City of Hawthorne has 4,246 disabled residents ages 5 to 64, and another 2,357 elderly residents with disabilities. **Table II-XIII** shown above reveals the numbers living with each different type of disability within the community. According to **Table II-XV**, under 1 percent of the jurisdictions public housing units are occupied by a person with a disability.

Interestingly, unlike other demographic factors analyzed in this report, the jurisdiction does not have a concentration of persons with disabilities in any singular location. As seen by **Map II-IX**, the 6,603 persons with disabilities within the jurisdiction are spread out across the city. There is no singular location that appears to hold a disproportionate, or significantly higher, percentage of persons with disabilities.

**Table II-XV
Disability by Publicly Supported Housing Program Category**

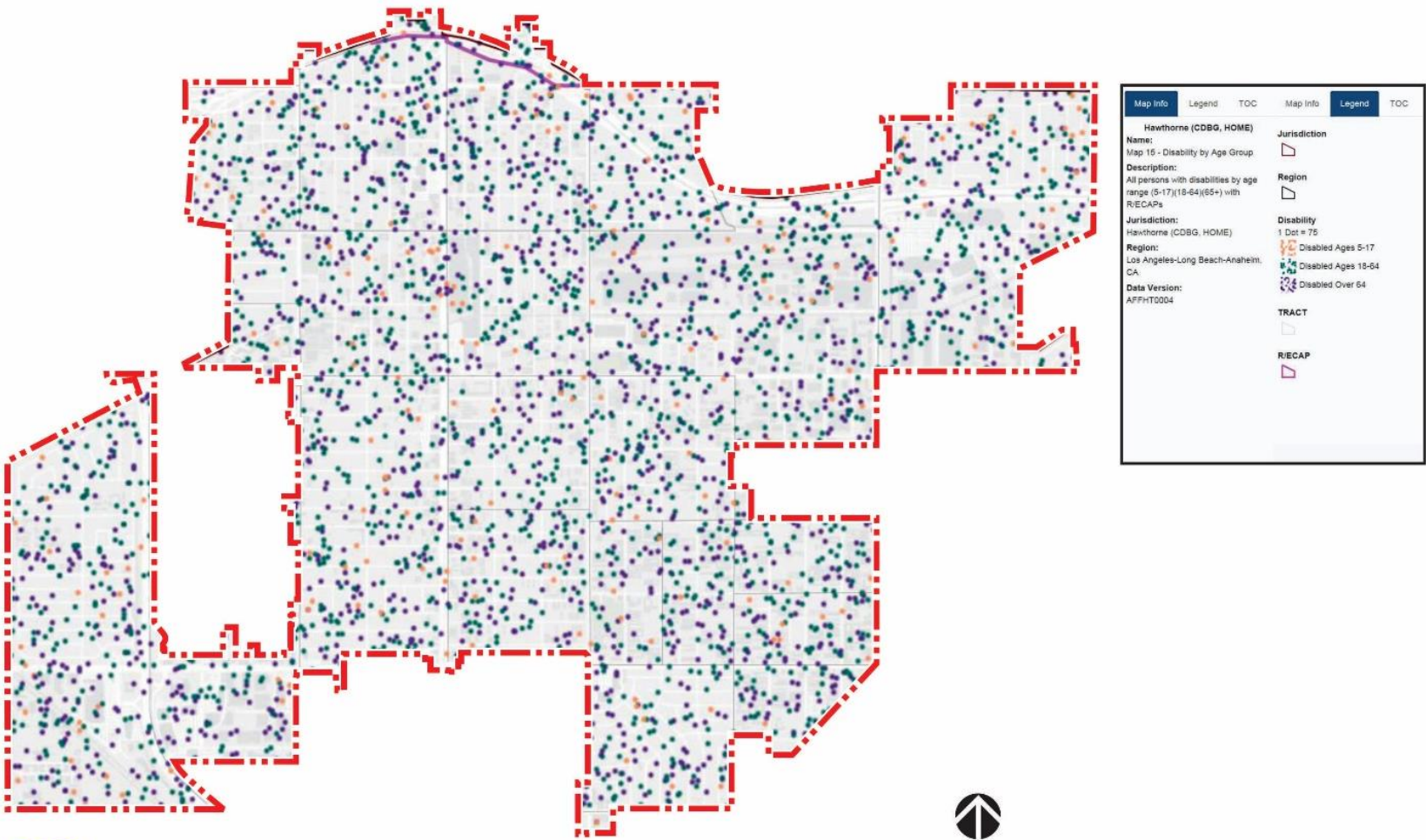
(Hawthorne, CA CDBG, HOME) Jurisdiction	People with a Disability	
	#	%
Public Housing	N/a	N/a
Project-Based Section 8	20	13.33%
Other Multifamily	N/a	N/a
HCV Program	211	24.06%
(Los Angeles-Long Beach-Anaheim, CA) Region		
Public Housing	1,407	14.32%
Project-Based Section 8	5,013	12.71%
Other Multifamily	869	15.62%
HCV Program	N/a	N/a

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Map II-IX Persons with Disabilities



City of Hawthorne

Data Source: *Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)*, U.S. Department of Housing and Urban Development, November 2017.

III. Analysis of Private Sector Impediments

Equal access and choice in housing, or what is commonly known as fair housing opportunity, is covered by federal and State statutes, regulations, and court decisions that prohibit discrimination in the rental, sale, negotiation, advertisement, or occupancy of housing on the basis of one or more protected classes. The twin goals of nondiscrimination and integration in housing are achieved through the actions of buyers, sellers, landlords, tenants, realtors, apartment associations, homeowner associations, condominium boards, insurers, builders, lenders, appraisers, home inspectors, cities, community benefit organizations, and the courts. This chapter provides an overview of the private sector housing industry in Hawthorne and its interrelationship with fair housing services.

A. Owner-Occupied Housing

Part of the American dream involves owning a home in a good neighborhood near good schools, parks, shopping centers, jobs, transportation, and other community amenities. Homeownership strengthens individual households and entire neighborhoods because owner-occupants have made an investment in their own personal property as well as the neighborhood and community. This fosters a greater sense of pride in the appearance and condition of not only the home but of the neighborhood as well. It also promotes owner involvement in the community because owner-occupants have a personal stake in the area and tend to be more active in decisions affecting the community. Fair housing opportunity laws protect an individual or family's right to occupy the housing of their choice that they can afford. Ensuring fair housing is an important way to not only preserve but to improve the housing opportunities for all residents in the City of Hawthorne.

Home Buying Process

Purchasing a home presents many challenges to the would-be owner. One of the main challenges in buying a home is the process by which an individual or family must acquire the property. The time required to find a home, the major legal and financial implications surrounding the process, the number of steps required and financial issues to be considered can be overwhelming to many home buyers. Throughout this time-consuming and costly process, fair housing issues can surface in many ways. Discriminatory practices in the home buying process can occur through the:

- Advertisement of homes for sale;
- Lending process;
- Appraisal process;
- Actions of real estate agents and sellers; and
- The issuance of insurance.

Advertising

The first step in buying a home is to search for available housing through advertisements that appear in magazines, newspapers, or on the Internet. Advertising is a sensitive issue in the real estate and rental housing market because advertisements can intentionally or inadvertently signal preferences for certain buyers or tenants. Recent litigation has held publishers, newspapers, the Multiple Listing Service (MLS), real estate agents and brokers accountable for discriminatory ads.

Advertising can suggest a preferred buyer or tenant in several ways. Some examples include advertisements or listings that:

- Suggest a preferred type of buyer or tenant household, e.g. “perfect for a young couple”;
- Use models that indicate a preference or exclusion of a type of resident, e.g. running a series of advertisements that only include photos of nuclear families, or that do not feature persons of color or persons with disabilities;
- Publish advertisements or listings in certain languages, e.g. only advertising homes/apartment complexes in predominately Hispanic neighborhoods on Spanish-language radio stations;
- Restrict publication to certain types of media or locations so as to indicate a preference.

As a rule of thumb, advertisements cannot include discriminatory references that describe current or potential residents, the neighbors or the neighborhood in racial or ethnic terms, or terms suggesting preferences for one group over another (e.g., adults preferred, ideal for married couples with kids, or conveniently located near Catholic church).

Lending

Initially, buyers must locate a lender who will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide sensitive information including their gender, ethnicity, income level, age, and familial status. This information is required to be gathered by the Community Reinvestment Act and the Home Mortgage Disclosure Act; however, it does not guarantee that individual loan officers or underwriters will not misuse the information.

A report on mortgage lending discrimination by the Urban Land Institute describes four basic stages in which discrimination can occur:

- **Advertising/outreach stage.** Lenders may not have branches in certain locations, not advertise to certain segments of the population, or violate advertising rules with respect to fair housing.
- **Pre-application stage.** Lenders may not provide applicants of different racial and ethnic backgrounds the same types of information as other preferred groups, or may urge some to seek another lender.
- **Lending stage.** Lenders may treat equally qualified individuals in a different manner, giving different loan terms, preferred rates, or denying a loan based on a factor not related to ability to pay and risk.
- **Loan administration.** Lenders may treat minorities in harsher terms, such as initiating foreclosure proceedings if any payment is late, or by making loans at terms that encourage defaults.

Appraisals

Banks order appraisal reports to determine whether or not a property is worth the amount of the

loan requested. Generally, appraisals are based on sale prices of comparable properties in the surrounding neighborhood of the subject property. Other factors such as the age of the structure, improvements made and location are also considered. Homes in some neighborhoods with higher concentrations of minorities and poverty concentrations may appraise lower than properties of similar size and quality in neighborhoods with lower concentrations of minorities or low-income households.

Taking these factors into consideration when valuing a property in an appraisal causes the arbitrary lowering of property values and restricts the amount of equity and capital available to not only the potential home buyer but also to the current owners in the neighborhood. Disparate treatment in appraisals is difficult to prove since individual appraisers have the latitude within the generally accepted appraisal practices to influence the outcome of the appraisal by factoring in subjective opinions.

Real Estate Agents Sellers

Finding a real estate agent is normally the next step in the home buying process. The agent will find the home for the prospective buyer that best fits their needs, desires, and budget based on the amount they are qualified for by the lender. Real estate agents may also intentionally or unintentionally discriminate by steering a potential buyer to particular neighborhoods, by encouraging the buyer to look into certain areas or failing to show the buyer all choices available. Agents may also discriminate by who they agree to represent, who they turn away and the comments they make about their clients.

Sellers

Even if a real estate agent is following fair housing practices, the current occupant (seller) may not want to sell his or her home to certain purchasers protected under fair housing laws or they may want to accept offers only from a preferred group. Oftentimes, sellers are present when agents show properties to potential buyers and sellers may develop certain biases based upon this contact. The Residential Listing Agreement and Seller's Advisory forms that sellers must sign disclose their understanding of fair housing laws and practices of discrimination. However, preventing this type of discrimination is difficult because a seller may have multiple offers and choose one based on bias.

Insurance

Insurance agents have underwriting guidelines that determine whether or not a company will sell insurance to a particular applicant. Currently, underwriting guidelines are not public information; however, consumers have begun to seek access to these underwriting guidelines to learn if certain companies have discriminatory policies, called redlining. Some states require companies to file the underwriting guidelines with the State Department of Insurance, making the information public. Texas mandates this reporting and has made some findings regarding discriminatory insurance underwriting.

Many insurance companies have traditionally applied strict guidelines, such as not insuring older homes, that disproportionately affect lower income and minority households that can only afford to buy homes in older neighborhoods. A California Department of Insurance (CDI) survey found

that less than one percent of the homeowner's insurance available in California is currently offered free from tight restrictions. The CDI has also found that many urban areas are underserved by insurance agencies.

Home Loan Activity

A key aspect of fair housing choice is equal access to financing for the purchase or improvement of a home. In 1977, the Community Reinvestment Act (CRA) was enacted to improve access to credit for all communities, regardless of the race/ethnic or income makeup of its residents. CRA was intended to encourage financial institutions to help meet the credit needs of communities, including low-moderate income people and neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance.

In tandem with the Home Mortgage Disclosure Act (HMDA), financial institutions with assets exceeding \$10 million are required to submit detailed information on the disposition of home loans by applicant characteristics. HMDA data can then be evaluated with respect to lending patterns.

During Calendar Year 2017, 2,665 households filed loan applications for housing in Hawthorne. Of those applications, 402 were withdrawn before approval or denial and 160 were closed for incompleteness prior to a decision. Lending institutions rendered decisions on 2,103 loan applications. The data in **Table III-I** shows that the number of loan applications is highest for refinancing at 60.8 percent of all loans, followed by loans for home purchase at 29.4 percent of the total and a mere 9.8 percent of all loans for home improvement. Approval rates were greatest for loans for home purchase at 93.4 percent and lowest for home improvement at 72.7 percent approval rates. Conventional loans were the most common for all loan purposes. The average loan approval rate for all loan types and loan purposes was 82.6 percent.

**Table III-I
Home Loan Application Activity in Hawthorne**

Type	Number of Loan Applications	Share of Loan Applications	Number Approved	Approval Rate
Home Purchase	619	29.43%	578	93.38%
Conventional	438	20.83%	408	93.15%
FHA - Insured	137	6.51%	127	92.70%
VA - Guaranteed	44	2.09%	43	97.73%
FSA/RHS	0	0.00%	0	0.00%
Home Improvement	205	9.75%	149	72.68%
Conventional	189	8.99%	136	71.96%
FHA - Insured	11	0.52%	8	72.73%
VA - Guaranteed	5	0.24%	5	100.00%
FSA/RHS	0	0.00%	0	0.00%
Refinancing	1,279	60.82%	1,009	78.89%
Conventional	1,056	50.21%	843	79.83%
FHA - Insured	150	7.13%	105	70.00%
VA - Guaranteed	73	3.47%	61	83.56%
FSA/RHS	0	0.00%	0	0.00%
Total:	2,103	100.00%	1,736	82.55%

Source: 2017 HMDA Database.

Mortgage Interest Rates & Fees

A key component to securing a home loan is the interest rate and fees associated with the loan. In 2018, *Housing Policy Debate*⁴ published an article authored by Jacob William Fabor which looked at the “Racial Inequality in a Recovered Mortgage Market.” Through their analysis, Fabor was able to isolate a discrepancy not only in loan acceptance rates between various races and ethnicities, but also in the interest rates given to those accepted loans. Fabor found that black applicants were more likely to be charged higher than rates than their white counterparts.

The author of this study used HDMA data from loans between the years of 2014 and 2018, and considered a number of variables, including: race, when the mortgage was originated, borrower’s characteristics (specifically their race and gender), the type of loan issued, tract characteristics of applicants, residential segregation in the applicant’s area, and the census region of the applicant.

According to the authors, the statistics they used suggested clear differences between non-white and white borrowers in almost every respect. Not only were the differences clear, but the difference in interest rates was substantial, “Black and Latino borrowers were approximately 3

⁴ Fabor, Jacob William, “Segregation and the Geography of Creditworthiness: Racial Inequality in a Recovered Mortgage Market,” *Housing Policy Debate*, Vol. 28 Issue 2, p. 215-247 (2018)

times as likely to receive high-cost loans compared with Whites (and four times as likely as Asian borrowers).” This finding is even more significant as “Racial inequalities persisted even after controlling for borrower, loan, and ecological characteristics.”

Importantly, the study found that spatial factors also influence the interest rates of minority applicants. In neighborhoods that were more heavily integrated, differences in interest rates were minimal. As explained by the author, “Racial gaps in the likelihood of receiving a high-cost loan were much smaller in integrated neighborhoods and metropolitan areas, but widened substantially as racial isolation increased.”

Lending Outcomes

This section summarizes lending activity in Hawthorne in 2017. HMDA data provides some insights regarding the lending patterns in a community. However, the HMDA data is only an indicator of potential problems; it cannot be used to conclude discrimination due to the limitations of the data.

Lending Outcomes by Income and Race/Ethnicity. Generally, home loan approval rates increase as household income increases. This was true for seven of the nine loan categories (except for middle-income home improvement and home refinance loans). **Table III-II** shows loan approval rates for home purchases, improvements, and refinances by applicant characteristics.

While it is not possible to ascribe discriminatory intent from the loan data presented, it is noteworthy that African-Americans had approval rates below the average approval rate for each income level in seven of the nine loan categories. They only held above average approval rates for middle income home improvement loans, and low-income home refinancing loans. The “All Others” grouping experienced the next lowest approval rates, being below the average in six of the nine categories. It should be noted that although they experienced this discrepancy in approval rates, they also had substantially lower loans applied for than the other racial categories.

Differences in approval rates for home loan applications among minorities do not necessarily reflect discriminatory practices. Differences could be due to credit scores, employment history, knowledge of the lending process, debt-income ratio, or other factors. Nonetheless, the persistence of lower loan approval rates among minorities could be the subject of additional inquiry and examination.

Table III-II
Home Loan Approval Rates by Applicant Characteristics

Type	Low/Mod Income		Middle Income		Upper Income	
	<80% MFI		80-120% MFI		120+ MFI	
Race/ Ethnicity	Loan Applications	Approval Rate	Loan Applications	Approval Rate	Loan Applications	Approval Rate
Home Purchase	89	91.01%	43	88.37%	487	94.25%
Hispanic	9	55.56%	10	90.00%	113	97.35%
White	4	75.00%	10	90.00%	176	93.75%
Asian	3	100.00%	8	100.00%	71	97.18%
African American	1	0.00%	5	40.00%	39	84.62%
All Others	1	100.00%	1	100.00%	20	95.00%
Decline or N/A	71	97.18%	9	100.00%	68	92.65%
Home Improvement	33	57.58%	51	64.71%	121	80.17%
Hispanic	11	45.45%	19	63.16%	47	80.85%
White	5	60.00%	8	62.50%	29	93.10%
Asian	1	0.00%	3	66.67%	8	62.50%
African American	6	50.00%	12	83.33%	17	64.71%
All Others	0	0.00%	2	50.00%	3	66.67%
Decline or N/A	10	80.00%	7	42.86%	17	82.35%
Home Refinance	295	79.32%	273	73.26%	711	80.87%
Hispanic	77	64.94%	128	75.78%	203	81.28%
White	34	73.53%	40	67.50%	188	85.11%
Asian	3	33.33%	22	81.82%	49	89.80%
African American	39	84.62%	30	63.33%	97	69.07%
All Others	8	37.50%	6	16.67%	17	76.47%
Decline or N/A	134	91.04%	47	80.85%	157	80.25%

Source: HMDA Database 2017.

Lending Outcomes by Tract Characteristics. The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low- and moderate-income neighborhoods. Analyzing lending patterns by neighborhood characteristics can show whether significantly fewer home loans are being approved or issued in low/moderate income neighborhoods or neighborhoods with a disproportionately high percentage of minority residents. The lack of lending activity in one or more neighborhoods has been linked to unequal access to credit among different race and ethnic groups and alleged practices of redlining and discrimination.

Table III-III shows a comparison of home purchase and refinance loan approval rates at the census tract level by the minority concentration in the tract as well as tract income level relative to the Area Median Income. Hawthorne is a multi-cultural community with neighborhoods that reflect the City's demographics.

**Table III-III
Home Loan Approval Rates by Tract Characteristics**

Tract Characteristics	Home Purchase Loans			Home Refinance Loans		
	Number of Applications	Number Approved	Percent Approved	Number of Applications	Number Approved	Percent Approved
Minority Percentage						
20% to 50%	133	130	97.74%	116	97	83.62%
50% to 80%	193	180	93.26%	396	322	81.31%
80% +	293	268	91.47%	767	590	76.92%
Tract Income						
Low	201	182	90.55%	448	345	77.01%
Middle	107	100	93.46%	303	237	78.22%
Upper	311	296	95.18%	528	427	80.87%

Source: HMDA data, 2017.

Predatory Lending

Predatory lending involves abusive loan practices usually targeting minority homeowners or those with less-than-perfect credit histories. Examples of predatory lending practices include high fees, hidden costs, unnecessary insurance, and larger repayments due in later years. A common predatory practice is directing borrowers into more expensive and higher fee loans in the “subprime” market, even though they may be eligible for a loan in the “prime” market. Predatory lending is prohibited by a number of state and federal laws.

The Fair Housing Act of 1968 prohibits discrimination in the making or purchasing of loans, or in providing of other financial assistance, or the terms and conditions of such financial assistance for the purpose of purchasing, constructing, improving, repairing, or maintaining a dwelling because of race, religion, color, national origin, sex, family status, or disability. The Equal Credit Opportunity Act of 1972 also requires equal treatment in loan terms and availability of credit for all of the above categories, as well as age and marital status. Lenders would be in violation of these acts, if they target minority or elderly households to buy higher-priced loan products, treat loans for protected classes differently, or have policies or practices that have a disproportionate effect on the protected classes.

In addition, the Truth in Lending Act (TILA) requires lenders to inform the borrower about payment schedules, loan payments, prepayment penalties, and the total cost of credit. In 1994, Congress amended TILA and adopted the Home Ownership and Equity Protection Act (HOEPA). HOEPA requires that lenders offering high-cost mortgage loans disclose information if the annual percentage rate (APR) is ten points above the prime rate or if fees are above eight percent of the loan amount. HOEPA also prohibits balloon payments for short-term loans and, for longer covered loans, requires a warning if the lender has a lien on the borrower’s home and the borrower could lose the home if they default on the loan payment.

Following North Carolina's lead, in September 2001, California became the second state to pass a law banning predatory lending. Codified as AB489 and amended by AB344, the law enables state regulators and the Attorney General to attempt to prevent "predatory" lending practices by authorizing the state to enforce and levy penalties against licensees that do not comply with the provisions of this bill. The law provides protections against predatory lending to consumers across the state with respect to financing of credit insurance, high loan and points, steering and flipping, balloon payments, prepayment penalties, call provisions, interest rate changes upon default, or encouragement to default when a conflict of interest exists.

Foreclosures

Foreclosure occurs when homeowners fall behind on one or more scheduled mortgage payments. The foreclosure process can be halted if the homeowner is able to bring their mortgage payments current or if the homeowner sells their home and pays the mortgage off. However, if regular payments cannot be resumed or the debt cannot be resolved, the lender can legally use the foreclosure process to repossess (take over) the home. When this happens, the homeowner must move out of the property. If the home is worth less than the total amount owed on the mortgage loan, a deficiency judgment could be pursued. If that happens, the homeowner would lose their home and also would owe the home lender an additional amount.

In the late-2000s the number of foreclosed homes in California hit an all-time high. The problem was so severe in its consequences that numerous factors have been attributed for the high incidence of foreclosure, including but not limited to abnormally high housing prices in the early part of the decade, the origination of sub-prime loans to unqualified buyers, the economic recession and job losses. This confluence of negative economic incidents left most housing markets in the United States in severe decline with historically high rates of foreclosure. Property values declined significantly—in some cases to pre-2000 levels.

Southern California was characterized by a high percentage of foreclosed homes as many homeowners were unable to keep up with payments. The high foreclosure rate prompted Congress to create the Neighborhood Stabilization Program (NSP), which is administered by the U.S. Department of Housing and Urban Development (HUD) to purchase abandoned and foreclosed properties in an effort to stabilize local housing markets that have been targeted for their high risk of foreclosure. The NSP provided grants to every state and certain local communities to purchase foreclosed or abandoned homes and to rehabilitate, resell, or redevelop these homes in order to stabilize neighborhoods and stem the decline of house values of neighboring homes. The program was authorized under Title III of the Housing and Economic Recovery Act of 2008.

The high incidence of foreclosure and the housing crisis in general represented a system-wide collapse of the housing market that resulted in numerous national, state and local efforts to reform virtually every aspect of housing acquisition and finance.

A full decade has now passed since the foreclosure crisis began, and the housing market is has rebounded. ATTOM Data Solutions recently announced its Fiscal Year 2018, 3rd Quarter numbers, which show that foreclosure filings are down 6 percent from the previous quarter, down 8 percent from the third quarter last year, and were at their lowest levels since the fourth quarter

of Fiscal Year 2005.⁵ Not only are foreclosure filings down for the last quarter, foreclosure filings have been below the pre-recession average for eight consecutive quarters. However, that same report indicates that there is still a relatively modest, but widespread, foreclosure risk associated with FHA loans originated in 2014 and 2015, exceeding the long-term average foreclosure rates for all FHA loans. Overall, the housing market seems to have recovered from the recent crisis.

Agency Coordination

Many agencies are involved in overseeing real estate industry practices and the practices of the agents involved. A portion of this oversight involves ensuring that fair housing laws are understood and complied with. The following organizations have limited oversight within the real estate market, and some of their policies, practices, and programs are described.

National Association of Realtors (NAR). The National Association of Realtors (NAR) is a consortium of realtors which represent the real estate industry at the local, state, and national level. Locally, the South Bay Association of REALTORS (SBAOR) is the main association that serves the City of Hawthorne and has over 3,000 members. As a trade association, members receive a range of membership benefits. However, in order to become a member, NAR members must subscribe to its Code of Ethics and a Model Affirmative Fair Housing Marketing Plan developed by HUD. The term Realtor thus identifies a licensed real estate professional who pledges to conduct business in keeping with the spirit and letter of the Code of Ethics.

Realtors subscribe the NAR’s Code of Ethics, which imposes obligations upon Realtors regarding their active support for equal housing opportunity. Article 10 of the NAR Code of Ethics provides that “Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin.” Realtors shall not print, display or circulate any statement or advertisement with respect to the selling or renting of a property that indicates any preference, limitations or discrimination based on race, color, religion, sex, handicap, familial status, or national origin.”

The NAR has created a diversity certification, “At Home with Diversity: One America” to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR “At Home with Diversity” course. The certification signals to customers that the real estate professional has been trained on working with the diversity of today’s real estate markets. The coursework provides valuable business planning tools to assist real estate professionals in reaching out and marketing to a diverse housing market. The NAR course focuses on diversity awareness, building cross-cultural skills, and developing a business diversity plan. In July 1999, the NAR Diversity Program received the HUD “Best Practices” award.

California Association of Realtors (CAR). The California Association of Realtors (CAR) is a trade association that includes more than 117 local member Associations and more than 175,000 Realtors, Realtor-associates and affiliate members statewide. As members of CAR, Realtors subscribe to a strict code of ethics. CAR has recently created the position of Equal

⁵ <https://www.attomdata.com/news/market-trends/foreclosures/foreclosure-market-report-q3-2018/> retrieved October 19, 2018.

Opportunity/Cultural Diversity Coordinator. CAR holds three meetings per year for its general membership, and meetings typically include sessions on fair housing issues. They also maintain fair housing and ethics information on their website. The website address is as follows: <http://www.dre.ca.gov/>. The licensure status of individual agents can be reviewed at the following site: http://www.dre.ca.gov/licensees_sub.htm. This web site includes any complaints or disciplinary action against the agent.

Realtor Associations Serving Hawthorne. Realtor associations are generally the first line of contact for real estate agents who need continuing education courses, legal forms, career development, and other daily work necessities. The frequency and availability of courses varies among these associations, and local association membership is generally determined by where the broker is located. Complaints involving agents or brokers may be filed with these associations. Monitoring of services by these associations is difficult as detailed statistics of the education/services these agencies provide or statistical information pertaining to the members is rarely available. South Bay Association of REALTORS (SBAOR) serves the Hawthorne area.

California Department of Real Estate (DRE). The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons. DRE has adopted education requirements that include courses in ethics and fair housing. To renew a real estate license, each licensee is required to complete 45 hours of continuing education, including three hours in each of the four mandated areas: Agency, Ethics, Trust Fund, and Fair Housing. The fair housing course contains information that enables an agent to identify and avoid discriminatory practices when providing real estate services.

DRE investigates written complaints received from the public alleging possible violations of the Real Estate Law or the Subdivided Lands Law by licensees or subdividers. DRE also monitors real estate licensees conducting business as mortgage lenders and mortgage brokers. If an inquiry substantiates a violation, DRE may suspend or revoke a license, issue a restricted license, or file an Order to Desist and Refrain. Violations may result in civil injunctions, criminal prosecutions, or substantial fines. The Department publishes monthly a list of names of persons and businesses which have been conducting real estate activities without a license.

DRE reviews Covenants, Conditions, and Restrictions (CC&R's) for all subdivisions of five or more lots, or condominiums of five or more units. The review includes a wide range of issues, including compliance with fair housing law. CC&R's are restrictive covenants that involve voluntary agreements, which run with the land they are associated with. In the past, CC&R's were used to exclude minorities from equal access to housing. DRE reviews CC&R's and they must be approved before issuing a final subdivision public report. This report is required before a real estate broker or anyone can sell the units, and each prospective buyer must be issued a copy of the report.

The California Organized Investment Network (COIN). COIN is a collaboration of the California Department of Insurance, the insurance industry, community economic development organizations, and community advocates. This collaboration was formed in 1996 at the request of the insurance industry as an alternative to state legislation that would have required insurance companies to invest in underserved communities, similar to the federal Community Reinvestment Act (CRA) that applies to the banking industry. COIN is a voluntary program that facilitates insurance industry investments providing profitable returns to investors and economic/social

benefits to underserved communities.

B. Rental Housing

Similar to the owner-occupied market, a major challenge to ensuring fair housing in the rental market is the complexity of the process. Stages in the process of renting a home include advertising, pre-application inquiries, viewing the apartment, criteria for qualifying for the lease, lease conditions, and administration of the lease. The process becomes even more difficult and subjective in a tight rental market, where the landlord has numerous options for choosing the future tenant based on subjective factors.

The Rental Process

While the process of renting an apartment or home may be less expensive and burdensome up front than the home-buying process, it may still be just as time-consuming and potential renters may still face discrimination during various stages of the rental process. Some of the more notable ways in which tenants may face discriminatory treatment are highlighted below.

Advertising

The main sources of information on rentals are newspaper advertisements, word of mouth, signs, apartment guides, the Internet, and apartment brokers. Recent litigation has held publishers, newspapers, and others accountable for discriminatory ads. Advertising can suggest a preferred tenant by suggesting preferred residents, using models, publishing in certain languages, or restricting media or locations for advertising. Advertisements cannot include discriminatory references that describe current or potential residents, the neighbors or the neighborhood in racial or ethnic terms, or other terms suggesting preferences (e.g., adults preferred, ideal for married couples with kids, or conveniently located near a Catholic church).

Discriminatory advertising can be one of the most insidious forms of discrimination based on its widespread dissemination. Marketing is typically broad-based, reaching many people, and as such, can have a chilling effect on the market. This is also particularly true when the discrimination is unintentional or subconscious. Landlords who may never discriminate knowingly against a minority applicant may not be contacted by minority potential renters due to unconscious signaling in the advertisements. This is why, even though there are exceptions in the Fair Housing Act for when it applies, there is no similar exception when it comes to the advertising rules.

Viewing the Unit

Viewing the unit is the most obvious, or overt, place where potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, judge on appearance whether a potential renter is reliable or may violate any rules, or make any other subjective judgments. For example, if a student is wearing a T-shirt with a rap artist on the front, a landlord may suspect that the renter could play loud music disturbing to other tenants. If a prospective tenant arrives with many children, the landlord may be concerned that the children may disturb other renters. In addition, the prospective tenant may also have an accent or wear religious symbols or jewelry which may again play into the decision to rent the unit. The opportunity for the potential renter to view the unit, is also an opportunity for the landlord to

view the potential tenant and make value judgments based on their appearance or personal characteristics.

Qualifying for the Lease

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history and salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent a home. An initial payment consisting of first and last months' rent and security deposit are typically required. To deter "less-than-desirable" tenants, a landlord may ask for an initial payment or security deposit higher than for others. Tenants may also face differential treatment when vacating the unit. The landlord may choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear.

Because the rental market is getting tighter, with more applicants for every available unit than ever before, landlords who wish to do so have more cover when discriminating when choosing whom to rent to. Because there are more applicants, there are more qualified applicants, and the potential for discrimination arises when the landlord has to decide between multiple qualified candidates of different demographics.

The Lease

Most apartments are rented under either a lease agreement or a month-to-month rental agreement, both of which have advantages and disadvantages for both landlords and tenants. Some tenants see a lease as more favorable for two reasons: the tenant is assured the right to live there for a specific period of time and the tenant has an established rent during that period. However, some tenants prefer the flexibility that a month-to-month tenancy provides. The lease agreement usually includes the rental rate, required deposit, length of occupancy, apartment rules, and termination requirements, and there are rights and responsibilities on both sides of the contract. Typically, the rental agreement is a standard form for all units in the same building. However, enforcement of rules contained in the lease agreement may not be standard. A landlord may choose to strictly enforce rules for certain tenants based on their race/ethnicity, children, or a disability – raising fair housing concerns.

Rental Housing Services

The City of Hawthorne has contracted with the Housing Rights Center (HRC) to provide fair housing and related services. HRC is a private, non-profit and community-based organization which implements various fair housing programs for communities throughout Los Angeles County.

During the last three years, HRC assisted rental housing residents in the City of Hawthorne with the resolution of a wide variety of landlord/tenant issues. It is important to note that any resident in HRC's service area can utilize their services and expertise to navigate the complex laws facing landlords, managers and tenants in the rental housing market. It is common for landlords, managers and tenants to take inappropriate actions against other parties due to lack of knowledge about laws affecting tenancy in rental housing. Oftentimes, such disputes are resolved merely through education, and do not require the parties to file a lawsuit, or file formal complaints with the City, to enforce their rights.

Agency Coordination

Many agencies oversee the apartment rental process and related practices. This oversight includes ensuring that fair housing laws are understood and complied with. The following organizations have limited oversight within the rental housing market, and some of their policies are described.

California Apartment Association (CAA)

CAA is the country's largest statewide trade association for rental property owners and managers. Incorporated in 1941 to serve rental property owners and managers throughout California, CAA represents rental housing owners and professionals who manage more than 1.5 million rental units. CAA has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared towards improving the approach, attitude and professional skills of on-site property managers and other interested individuals. The CCRM program consists of 31.5 hours of training that includes fair housing and ethics along with other courses.

National Association of Residential Property Managers (NARPM)

NARPM promotes standards of business ethics, professionalism, and fair housing practices in the residential property management field. NARPM is an association of real estate professionals experienced in managing single-family and small residential properties. The North Los Angeles Chapter covers Hawthorne. In addition, NARPM certifies its members in the standards and practices of the residential property management industry and promotes continuing professional education. NARPM offers 3 professional designations: Residential Management Professional, RMP®, Master Property Manager, MPM®, and Certified Residential Management Company, CRMC®. These certifications require educational courses in fair housing.

IV. Analysis of Public Policy Impediments

A. Land Use Policy

General Plan

Land use policies are fundamental to ensuring housing opportunities. The City of Hawthorne General Plan establishes the type, location, amount and density for residential uses of land within the City in the manner prescribed by the State Planning Law. The City's Zoning Code implements the goals and objectives set forth in the adopted General Plan. Land Use policies that do not promote a variety of housing opportunities can impede housing choice especially for low- and moderate-income persons and households.

The City of Hawthorne accommodates housing in five of its 13 General Plan Land Use designations. The City's zoning regulations are required by State Law to implement the land use goals and objectives set forth in the adopted General Plan. The City's Zone Code (Title 17 of the Hawthorne Municipal Code) contains five zone districts that provide for residential development. Additionally, the City has adopted Specific Overlay Plans to provide for mixed uses and to regulate the design of unique residential housing developments. **Table IV-I** provides a summary of the five zone districts and the use of specific plans to implement the General Plan residential land use goals and objectives.

Table IV-I
General Plan Land Use Designations & Zones Allowing Residential Uses

General Plan Designation	Zone District	Description
Low Density Single-Family Residential	R-1	Low density single-family residential zone requiring a minimum lot area of 5,000 sq. ft. Single-family detached residential dwelling units, accessory units and mobilehomes are permitted.
	H	Horticultural Zone permitting any use allowed in the R-1 zone
Medium Density Single-Family Residential	R-2	Medium density residential zone. Permits uses allowed in the R-1 zone except accessory living quarters. Provides for two-family dwellings.
High Density Multi-Family Residential	R-3	High density residential zone. Permits multi-family dwelling units at a density of 17.4 DU/Acre and any use permitted in the R-1 and R-2 zone districts.
	R-4	Maximum density residential – restricted service zone. Permits multi-family dwelling units, allowed uses permitted in the R-1, R-2 and R-3 zones, Unclassified uses, conditional uses such as fraternity and sorority houses, hospitals, mobile home parks, private clubs and fraternal societies, rest homes, sanitariums, nursing homes, senior citizen housing etc.
Mixed Use Commercial / Residential Zones	Specific Plans	The City of Hawthorne uses the Specific Plan as an instrument to review and implement commercial/residential mixed-use development among other things.

Sources: Hawthorne General Plan, Hawthorne Zoning Ordinance, 2015.

In addition to implementing and regulating the General Plan residential land use designations through the creation of various residential zone districts, the City of Hawthorne adopted several specific plans that provide added flexibility for the creation of residential development within an environment of commercial services. The Prestige Villa, Willow Glen, Pacific Glen, Primavera Courts, and the Central Park Specific Plans established site-specific design and development standards that provided for mixed-use residential development. Each specific plan created planning and development standards tailored to the unique site characteristics or project purpose.

According to the City's latest (2013-2021) Housing Element update, the City is currently in the process of preparing a specific plan for the City's downtown: The Downtown Hawthorne Specific Plan. The Project Area is comprised of Hawthorne Boulevard, Imperial Highway and the residential blocks that are within one-quarter mile of these major arterials. The City describes the Plan as follows: "The future transformation of a dilapidated and under-utilized section of this 1920s town will give its residents a "city center" by stimulating environmentally sensitive development, encouraging alternative forms of travel, and providing jobs and affordable housing to this economically disadvantaged community."

Zoning Ordinance

Title 17 of the Hawthorne's Municipal Code sets forth the requirements of the City's Planning and Zoning Ordinance. According to the Municipal Code, the purpose of this Title is "to classify uses and to regulate the location of such uses in such manner as to group as nearly as possible those uses which are mutually compatible, and to protect each such group of uses from the intrusion of incompatible uses which would destroy the security and stability of land and improvements and which would prevent the greatest practical convenience and service to the citizens of the city; to make it possible to more efficiently and economically design and install all physical public service facilities in terms of size and capacity to adequately and permanently meet the ultimate requirements resulting from a defined intensity and type of land use; to require essential related facilities with particular reference to the traffic pattern and well-located and well-designed off-street parking and, through the medium of the map which is a part of this title, to establish the geographical location and boundaries of the areas or zones to which the different classifications will apply.

A further purpose of this title is to establish required minimum lot areas, yards and open spaces as a means of providing a suitable environment for living, business and industry and to maintain reasonable population densities and reasonable intensities of land use, all for the general purpose of conserving public health, safety, morals, convenience and general welfare."

Housing Element

The Housing Element is one of seven State mandated general plan elements. Cities are required to update their housing elements every five years. The State of California housing element law, enacted in 1969 and recently amended in 2008 by Senate Bill 2, requires that local governments adequately plan to meet the existing and projected housing needs for all economic segments of their community.

The Housing Element's primary goals are to conserve and improve the conditions of affordable housing stock; assist in developing adequate housing for low to moderate income households; remove constraints to housing developments; identify adequate housing sites, and assure equal housing opportunity for all residents. These goals also accommodate the City's designated Regional Housing Needs Assessment or RHNA allocation. All the cities and counties in Los Angeles County have been allocated certain housing growth objectives that will enable the region to meet its projected housing needs in the coming years. The Southern California Association of Governments (SCAG) has been delegated with the responsibility in developing regional growth forecasts and then assigning new housing objectives for each city and county under SCAG's jurisdiction. In addition to establishing an overall objective for new housing units for the defined planning period (2014-2021), the SCAG RHNA also indicated the proportion of future housing units that should be accessible to households with varying incomes. The RHNA that is applicable to Hawthorne is summarized below:

- A total of 170 units should be allocated to very low-income households (less than 30 percent of the Los Angeles County median income);
- A total of 101 units should be allocated to very low-income households (less than 50 percent of the Los Angeles County median income);
- A total of 112 units should be provided for low-income (50 percent – 80 percent of the median income) households;
- A total of 300 units should be provided for moderate-income (80 percent – 120 percent of the median income) households; and
- The total number of new housing units that will need to be added to the city's housing inventory during the 2014 - 2021 planning period is 683 units.

The City of Hawthorne 2013-2021 Housing Element sets forth goals and policies that address five major issue areas:

1. Conserve and improve the condition of the existing affordable housing stock;
2. Assist in the development of adequate housing to meet the needs of low and moderate income households;
3. Remove, to the extent feasible, constraints to the development, improvement, and preservation of housing;
4. Identify adequate housing sites which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all residents; and
5. Assure equal housing opportunity for all residents.

The Housing Element also describes various housing programs intended to facilitate meeting the objectives described above. To implement these goals and policies, the Housing Element 2013-2021 describes 18 critical programs. Where relevant to this Analysis of Impediments, housing programs that affect Fair Housing are described in this report. As indicated in the HCD

Compliance Report dated April 1, 2015, the City's draft Housing Element was adopted on March 21, 2014.

Housing Opportunities

Housing Element law requires that cities facilitate and encourage the provision of a range of housing types and prices suitable for all economic segments and special need groups. Local government policies that limit or exclude housing for persons with disabilities; the lower income; homeless persons; families with children; or other groups may violate the Fair Housing Act. **Table IV-II** highlights permitted residential uses in the various zones throughout the City.

Table IV-II
Housing Opportunities Permitted by Zone

Housing Type	R-1	H	R-2	R-3	R-4
Single-Family Detached	P	P	P	P	P
Single-Family Attached	X	X	P	P	P
Two-Family (Duplex)	X	X	P	P	P
Multiple-Family	X	X	X	CUP	CUP
Manufactured Home	P	P	P	P	P
Mobile Home Parks	X	X	X	X	CUP
Senior Housing	X	X	X	X	CUP
Second Units / Granny Units	P	P	X	P	P
Live/Work	X	X	X	X	X
Community Care Facilities (one to six persons)	P	P	P	P	P
Community Care Facilities (seven or more persons)	X	X	X	X	CUP
Emergency Shelter / Transitional Housing	X	X	X	X	X

Source: City of Hawthorne Zone Code, 2015.

P: Permitted

SP: Site Plan Review Required

CUP: Conditional Use Permit Required

CUP: Requires Conditional Use Permit

X: Prohibited

**.: Allowed only as part of an approved specific plan.

Single Family and Multi-Family

Detached single-family dwelling units are a permitted use in the multi-family residential zones. The City recognizes that the use of multi-family residential zone districts for the development of detached single-family dwelling units can have the effect of using up a scarce land resource that is needed for the creation of multi-family dwelling units. The City is of the opinion that market forces will demonstrate that it is economically infeasible to use multi-family zoned property for the construction of a single-family residential dwelling unit. The City of Hawthorne does not

require a conditional use permit or other discretionary permit process for the review and approval of multi-family developments in the R-3 and R-4 zone districts. The City of Hawthorne is in compliance with HCD requirements pertaining to the zoning for multi-family developments.

Manufactured Housing

State law requires cities to permit the installation of manufactured dwelling units on parcels of land zoned for single-family detached dwellings provided that the manufactured dwelling units meet the location and design criteria established in the Zone Code and State Law.⁶ The City's Zone Code explicitly defines manufactured dwelling unit as follows:

1. A mobile home or manufactured house was constructed after July 1, 1976 and was issued an insignia of approval by the United States Department of Housing and Urban Development and has not been altered in violation of applicable codes; and
2. The mobile home shall be attached to a permanent foundation system subject to the provisions of Section 18551 of the Health and Safety Code of the state of California; and
3. The mobile home shall be utilized for single-family residential purposes only; and
4. The mobile home shall be covered with an exterior material aesthetically compatible with other dwellings in the neighborhood and be approved by the director of building and safety and the director of planning; and
5. The mobile home shall have a roof consisting of shingles or other roofing materials aesthetically compatible with other dwellings in the neighborhood and be approved by the director of building and safety and the director of planning; and
6. The mobile home shall be required to have porches with eaves and/or roofs with eaves when, in the opinion of the director of planning, it is necessary to make the mobile home architecturally compatible with other dwellings in the neighborhood.”

Mobile Home Parks

State law requires that jurisdictions accommodate a mobile home park within their community; however, a city, county, or a city and county may require a use permit. A mobile home park refers to a mobile home development built according to the requirements of the California Health and Safety Code, and intended for use and sale as a mobile home condominium, cooperative park, or mobile home planned unit development.⁷ In compliance with State law, the City permits mobile homes parks, subject to a Conditional Use Permit, within the R-4 zone. The State Department of Finance reports that the City of Hawthorne has 173 mobile homes, many of which provide affordable homes to seniors and families.

Accessory Units

Enacted in 2002, AB1866 requires cities to use a ministerial process to consider and approve accessory dwelling units in residential zones.⁸ According to the State Department of Housing and Community Development (HCD), a local government must “...accept the application and approve or disapprove the application ministerially without discretionary review...” In order for an

⁶ California Government Code, § 65852.3

⁷ California Government Code § 65852.7

⁸ California Government Code § 65852.2

application to be ministerial, the process must apply predictable, objective, fixed, quantifiable, and clear standards. These standards must be administratively applied to the application and not otherwise be subject to discretionary decision-making by a legislative body. The City allows accessory units in all single-family residential zones and multi-family zones except the R-2 zone. Therefore, the City is in compliance with the provisions of AB1866.

Residential Care Facilities

The Lanterman Developmental Disabilities Services Act declares that mentally, physically, and developmentally disabled persons, children and adults who require supervised care are entitled to live in normal residential settings. State law requires that licensed residential care facilities serving six or fewer persons be treated as a residential use under zoning; and that they be allowed by right in all residential zones; and that they not be subject to more stringent development standards, fees, taxes, and permit procedures than required of the same type of housing (e.g., detached single-family dwellings) in the same zone.⁹

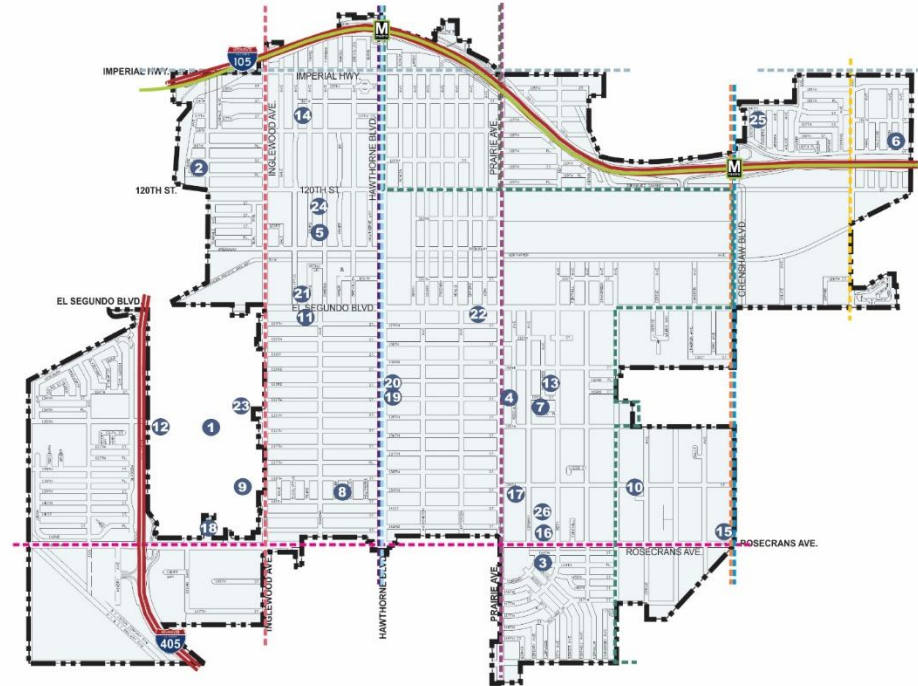
The City allows licensed group housing serving six or fewer clients as provided for by State Law in residentially zoned property and in the C-1 zone. Chapter 17.73 of the Hawthorne Zone Code provides for the accommodation of both small and large Family Day Care Homes in accordance with the provisions of State Law.

Residential care facilities serving more than six persons are not addressed in the Zoning Ordinance. The City will amend the Zoning Ordinance to conditionally permit residential care facilities for seven or more persons in the R-4 and MU Overlay zones. Conditions will pertain to performance standards (such as parking, management, security, hours of operation, etc.) and will not be different from those required for similar uses in the same zone.

Map IV-I illustrates the distribution of such facilities throughout the City of Hawthorne, as well as their proximity to public transportation.

⁹ California Welfare and Institutions Code, §5000 et. seq. California Health and Safety Code, §1500 et. seq.

Map IV-I Licensed Residential Care Facilities in Hawthorne



City of Hawthorne



LICENSED RESIDENTIAL CARE FACILITIES

ADULT RESIDENTIAL FACILITIES

- 1 Bridge II Adult Residential Facility
- 2 Chateau of life
- 3 Country Cottage 1
- 4 Delight Some Land
- 5 Friends United
- 6 Friends United LLC
- 7 The Goodlife Home
- 8 Inclusion Specialized Programs LLC - Manor
- 9 Inclusion Specialized Programs LLC - W 139th
- 10 Julians Place
- 11 Living Life
- 12 Paradise Palace 11
- 13 The Woodyear Home

ADULT DAY CARE

- 14 Advantage
- 15 Caltrans Employment Dev & Support Services, Inc.
- 16 Cultural Education Center for the Arts
- 17 Epi Center
- 18 Mychal's Learning Place
- 19 Pals Endeavors
- 20 Pals Endeavors Annex
- 21 Vistas - Hawthorne
- 22 Work & Service Coalition

ELDERLY ASSISTED LIVING

- 23 A Helping Hand South Bay
- 24 C-H #4 Residential Care for Elderly
- 25 Golden Harvest Care Homes
- 26 Rosecrans Villa Residential Care

PUBLIC TRANSPORTATION

- ROUTE 211
- ROUTE 215
- ROUTE 209
- ROUTE 210
- ROUTE 126
- ROUTE 125
- ROUTE 120
- ROUTE 710
- ROUTE 740
- ROUTE 40
- GREEN LINE

**Table IV-III
Licensed Residential Care Facilities in Hawthorne**

No.	Facility	Address	Capacity
Adult Residential Facility			
1	Bridge II Adult Residential Facility	4935 W. 136th Street	6
2	Chateau of Life	5007 W. 119th Place	3
3	Country Cottage 1	14508 Fonthill Avenue	4
4	Delight Some Land	13313 Roselle Avenue	4
5	Friends United	12245 Ramona Avenue	6
6	Friends United LLC	11725 S. Tarron Avenue	4
7	Goodlife Home, The	3837 W. 134th Place	4
8	Inclusion Specialized Programs LLC - Manor	13916 Manor Drive	3
9	Inclusion Specialized Programs LLC - W 139th	4835 W. 139th Street	3
10	Julian's Place	3506 W. 139th Street	4
11	Living Life	4645 W. 129th Street	3
12	Paradise Palace 11	5134 W. 136th Street	3
13	Woodyear Home, The	13234 Florwood Avenue	4
Adult Day Care			
14	Advantage	11703 Eucalyptus	15
15	California Employment Dev & Support Services, Inc.	14127 - 14127 1/2 Crenshaw Boulevard	30
16	Cultural Education Center for the Arts	3827 Rosecrans Avenue	40
17	Epi Center	3926 W. 139th Street	25
18	Mychal's Learning Place	4901 W. Rosecrans Avenue	45
19	Pals Endeavors	13326 Hawthorne Boulevard	15
20	Pals Endeavors Annex	13324 Hawthorne Boulevard	15
21	Vistas - Hawthorne	4679 W. El Segundo Boulevard	40
22	Work & Service Coalition	4070 El Segundo Boulevard	45
Elderly Assisted Living			
23	A Helping Hand South Bay	4848 134th Place	6
24	C-H #4 Residential Care for Elderly	12137 Ramona Avenue	4
25	Golden Harvest Care Homes	11623 Chanera Avenue	6
26	Rosecrans Villa Residential Care	14110 Cordary Avenue	135

Source: State of California, 2020. <https://secure.dss.ca.gov/CareFacilitySearch/>

B. Fair Housing Impediment Study: Review of the General Plan and Zoning Ordinance

This Analysis of Impediments to Fair Housing Choice includes the review of the General Plan and the Zone Code in order to identify regulations, practices and procedures that may act as barriers to the development, siting and use of housing for individuals with disabilities. In addition to the review of these City documents, City Planning and Building Department staff has been interviewed. Non-profit developers specializing in the creation of housing designed to address the special needs of persons with disabilities were solicited for their input. The data were analyzed to distinguish between regulatory and practice impediments described by the jurisdiction. **Table IV-IV** summarizes the results of this study.

Table IV-IV
Fair Housing Impediment Study

Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Impediment Description	Jurisdiction Practice	Comment
Regulatory	Yes	Definition of "Family"	Family is defined as "one or more persons living together in a dwelling unit, with common access to, and common use of all living, kitchen, and eating areas within the dwelling unit."	City definition of "Family" is consistent with definition set forth in State Codes.
Regulatory	Yes	Definition of "Disability"	A person who has a physical or mental impairment that limits one or more major life activities, anyone who is regarded as having that type of impairment or, anyone who has a record of that type of impairment. People who are currently using illegal substances are not covered under the Act, unless they have a separate disability.	City uses "Disability" definition set forth in the Federal Fair Housing Amendments Act of 1988 and California's Fair Employment and Housing Act.
Practice	Yes	Personal Characteristics of residents considered?	City does not regulate or consider residents personal characteristics.	City encourages and permits ADA housing improvements

Type of Impediment “Practice or Regulatory”	Compliance Yes or No	Impediment Description	Jurisdiction Practice	Comment
Practice	Yes	Mis-characterize ADA housing as “Boarding, Rooming House or Hotel”?	City provides for group housing as mandated by State law.	City complies with State law regarding housing opportunities. City does not restrict housing opportunities for individuals with disabilities.
Practice	Yes	On-site supporting services permitted?	City provides for on-site ADA supporting services.	City complies with State law regarding ADA services.
Regulatory	Yes	Restrict number of unrelated persons residing together if they are disabled/	City complies with State law regarding number of unrelated persons residing on-site regardless of disabilities.	City does not distinguish between able or disable when addressing the number of unrelated persons residing on-site.
Regulatory	Yes	Allow ADA Modifications in municipal-supplied or managed housing	City encourages ADA access.	City complies with State law. City encourages ADA access modifications as necessary.
Regulatory	Yes	Variances & Exceptions to zoning and land-use rules.	City requires a public hearing for all zoning variance as required by State law.	City complies with State law regarding the granting of variances and exceptions to zoning and land-use rules.
Regulatory	Yes	Residential Mixed Land Use Standards	City provides for commercial/residential mixed land use.	The C-1 zone includes the conditionally permitted uses such as commercial and residential unit configuration.
Regulatory	Yes	Zoning Exclusion regarding Discrimination	City does not exclude or discriminate housing types based on race, color sex, religion, age, disability, marital or family status, creed or national origin.	All City zoning and land use regulations and policies comply with Federal and State law regarding the prohibition of discrimination.
Regulatory	Yes	Senior Housing Restrictions & Federal Law	City permits multi-family senior housing in accordance with zoning standards.	Developers often request variances regarding the reduction of unit size and number of required off-street parking.
Regulatory	Yes	Zoning for ADA accessibility	City’s Building Code provides for ADA access.	City’s zone code defers to the Building Code regarding ADA access.

Type of Impediment “Practice or Regulatory”	Compliance Yes or No	Impediment Description	Jurisdiction Practice	Comment
Regulatory	Yes	Occupancy Standards and Limits	City zone code does not limit occupancy. The State Building and Housing Codes establish criteria to define overcrowding.	City codes comply with State law.
Regulatory	Yes	Zoning for Fair Housing	City’s Housing Element promotes Fair Housing; Zone Code does not conflict with that policy.	City’s General Plan promotes and requires compliance with all Fair Housing laws and policies.
Regulatory	Yes	Handicap Parking for Multi-Family Development	City’s Building Codes require 1 handicap parking space for each 40 required parking spaces.	City codes comply with State and Federal requirements.
Regulatory	Yes	Is a CUP required for Senior Housing?	City requires a CUP for convalescent homes, nursing homes and convalescent, rest home, boarding home or home for the aged.	Developers often request modification of housing standards for senior citizen housing such as smaller dwelling sizes and reduced number of off-street parking.
Regulatory	Yes	Does City distinguish between handicapped housing and other types of single-family or multi-family housing?	City does not require a CUP for Handicapped Housing. City provides for Reasonable Accommodation for individuals with disabilities.	City complies with State and Federal law regarding ADA designed housing.
Regulatory	Yes	How are “Special Group Housing” defined in the zone code?	City defines “Special Group Housing” as set forth in State law.	City complies with State and Federal law regarding “Special Group Housing”.
Regulatory	Yes	Does the City’s Building and planning codes make specific reference to accessibility requirements as set forth in the 1988 Fair Housing Act?	City adopted California State Building & Housing Codes. Chapter 17.41 of the Zone Code refers to the 1988 Fair Employment and Housing Act	Building Department reviews all plans for compliance with adopted codes. Monitoring is the responsibility of the building department. Reasonable Accommodations are provided for in the Zone Code.

The City of Hawthorne is committed to furthering and improving fair housing opportunities so people in all walks of life have the opportunity to find suitable housing in the community. To that end, the City contracts with the Housing Rights Center to provide landlord/tenant education, conduct testing of the rental and ownership market, and investigate and mediate housing complaints where needed. The City periodically prepares the required federal planning reports, including the analysis of Impediments to Fair Housing Choice, to document the City's progress in improving and maintaining fair housing opportunities. The City of Hawthorne has adopted General Plan policies and programs that promote Fair Housing goals and objectives in accordance with State mandate.

Emergency Shelters/Transitional Housing

State law requires cities to identify adequate sites, appropriate zoning, development standards, and a permitting process to facilitate and encourage development of emergency shelters and transitional housing. The courts have made rulings supporting this State mandate.¹⁰ To that end, State Law (SB2) requires jurisdictions to designate at least a zone and a permitting process to facilitate the siting of such uses. If a conditional use permit is required, the process to obtain the conditional use permit may not unduly constrain the siting and operation of such facilities.

The Zoning Ordinance defines emergency shelter as a facility that provides immediate and short-term housing for homeless persons that is limited to occupancy of six months or less. Supplemental services may include counseling and access to social programs. This definition is consistent with Government Code Section 65582(d). In 2013, the City amended the Zoning Ordinance to accommodate emergency shelters within the M-1 (Limited Industrial) and M-2 (Heavy Industrial) zones.

Emergency shelter application reviews are subject ministerial review and approval to determine that the proposed use conforms to zoning standards that apply throughout the M-1 and M-2 zones. The Zoning Ordinance defines transitional housing as a development with buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. The City amended the Zoning Ordinance in 2013 to also allow transitional and supportive housing as a residential use, subject to the same permitting process and development standards as other residential uses in the residential and mixed-use overlay zones.

C. Development Policy

Development Standards

The General Plan provides policy guidance and establishes land use patterns as to where housing can be located. The City's Zone Code establishes minimum residential development standards to: ensure construction of quality housing; to preserve and protect neighborhoods; and to further refine the City's land use goals. **Table IV-V** highlights pertinent single-family residential

¹⁰ Hoffmaster v. City of San Diego, 55 Cal.App.4th 1098

development standards in the City, while **Table IV-VI** addresses multi-family residential development standards.

Table IV-V
Single-Family Residential Development Standards

Standard	H	R-1
Density (units/acre)	8.	8
Minimum Lot Size	5,000 s,f,	5,000 s.f.
Maximum Lot Coverage	50%	50%
Maximum Height (stories)	2	2
Front/Rear Yard (ft.)	15/5	15/5
Required Parking Spaces	2-spaces min. plus 1 additional space for 5 or more bedrooms	2-spaces min. plus 1 additional space for 5 or more bedrooms

Source: Hawthorne Zoning Ordinance, 2015.

Table IV-VI
Multi-Family Residential Development Standards

Standard	R-2	R-3	R-4
Density (units/acre)	12	17.4	30
Minimum Lot Size	7,000 s.f.	7,500	7,500 s.f.
Maximum Lot Coverage	50%	60%	60%
Maximum Height (stories)	2	2.5	4
Front/Rear Yard (ft.)	15/5	15/5	15/5
Required Parking spaces	2-spaces min. plus 1 addition space for 4 or more bedrooms	2-spaces min. plus 1 addition space for 4 or more bedrooms	2-spaces min. plus 1 addition space for 4 or more bedrooms

Source: Hawthorne Zoning Ordinance, 2015.

Local Government Fees

Since the passage of Proposition 13 in 1978, local governments have had to diversify their revenue sources. As reliance on General Fund revenues declined, local governments began charging service fees and impact fees to pay for City services needed to support the development of new housing. The City currently charges fees and assessments to cover the costs of processing permits and providing services for residential projects.

Development fees depend on the location, project complexity, and cost of mitigating environmental impacts. **Table IV-VII** provides the most common development fees charged for a typical residential project. Hawthorne's planning fees are generally higher than those in the smaller cities of Redondo Beach and Lawndale. These two cities also contract with the County of Los Angeles for much of their plan checking functions, with costs being set by the County.

**Table IV-VII
Comparison of Planning Fees**

Fee Type	Hawthorne	Lawndale	Gardena	Inglewood
Conditional/ Special Use Permit	\$3,830 for <20,000 s.f. of land area; plus \$154 per 10,000 additional s.f.	\$5,062.75	\$4,068	Up to \$2,909
Variance	\$3,830 for <20,000 s.f. of land area; plus \$154 per 10,000 additional s.f.	\$3,682.86	\$4,068	Up to \$1,957
Zone Change Application	\$3,830	\$6,764.69	\$5,001	Up to \$5,553
General Plan Amendment	\$5,546 for <20,000 s.f. of land area + \$304 per 10,000 additional s.f.	\$6,764.69	\$5,001	Up to \$7,935
Tentative Parcel Map	\$3,879 plus \$234 per lot	\$3,470.11	\$4,068	\$1,058
Tentative Tract Map	\$3,830 plus \$232 per lot	\$3,470.11	\$4,068	\$3,703 + (\$60/lot; \$20/condo)

Sources: City websites, 2019.

[Lawndale Planning Department Fees 2018](#)

[Gardena Adopted Fee Schedule 2019](#)

[Inglewood Zoning Fee Schedule 2017](#)

Impact Fees

Development impact fees are established for mitigating various development impacts based on the specific existing conditions of and projected needs for infrastructure and public facilities. Therefore, comparing the levels of impact fees across communities does not recognize the unique circumstances for establishing these fees. Furthermore, impact fees are subject to the requirements of State law for ensuring reasonableness and proportionate share of responsibility.

The City has implemented development impact fees that are used for police facilities, park facilities, storm drain facilities and street and traffic signals. The total impact fees are presented **Table IV-VIII**. Developers can apply for a fee waiver if they can prove the lack of a nexus relationship between the proposed development and the fees charged.

**Table IV-VIII
Development Impact Fees**

Fee Amount	Residential
\$5,115	Per single-family detached dwelling
\$3,167	Per duplex, multi-family and/or condominium unit
School District Fees	
\$2.24	Hawthorne School District, per square foot of residential
\$2.63	Centinela Valley High School, per square foot of residential
\$3.20	Wiseburn School District, per square foot of residential
\$4.00	Los Angeles Unified School District, per square foot of residential

Source: City of Hawthorne, 2013.

The reduction of impact fees would diminish services that maintain the quality of life in neighborhoods. Given the modest level of City-controlled fees, they are not deemed to be a constraint to the production of housing in Hawthorne.

State law allows local governments to charge fees necessary to recover the reasonable cost of providing services. State law also allows local governments to charge impact fees provided the fee and the amount have a reasonable nexus to the burden imposed on local governments. While the fees in Hawthorne constitute a modest percentage of housing sales prices, the fees are necessary to provide an adequate level of urban services and to mitigate the impacts of housing development. To facilitate affordable housing development and to off-set the impact of these fees on development costs, the City has the ability to consider a waiver of the fees based on information presented to the City Council at a public hearing.

Building Codes

Building codes are enacted to ensure the construction of quality housing and further public health and safety. Ensuring that buildings are accessible to people with disabilities is an important way to improve fair housing. However, the rigid adherence to non-essential codes may indirectly create discriminatory impacts on people with disabilities. The following discusses the City's building codes and applicability to persons with disabilities.

The City of Hawthorne has adopted the 2010 edition of the California Building Code, which includes the State Green Building Code. California cities are required to adopt the California Building Standards Code (Title 24 of the California Code of Regulations). The Code is a set of uniform health and safety codes covering building, electrical, mechanical, plumbing, fire safety, and other issues. Uniform codes are considered the minimum acceptable standards for health and safety. The California Building Standards Commission updates these codes every three years based on updates to uniform codes adopted by professional associations (such as the ICBO).

State law allows cities to add local, more restrictive, amendments to the California Building Code, provided such amendments are reasonably necessary to address local climatic, geological, or

topographic conditions. To address local conditions requiring more stringent or particular standards, the City has replaced or amended certain sections of the 2007 California Building Code. Those changes to the Building Code, do not directly or indirectly limit the type of housing opportunities available to disabled persons nor do they limit access to housing. All local amendments are intended to strengthen and enhance building and safety standards to provide safer housing opportunities and disabled access to housing in excess of California Code's current requirements.

Accessibility Standards

Cities that use federal funds must meet federal accessibility guidelines that accommodate people with disabilities. For new construction and substantial rehabilitation, at least 5 percent of the units must be accessible to persons with mobility impairments and an additional 2 percent of the units must be accessible to persons with sensory impairments. New multi-family housing must also be built so that: 1) the public and common use portions of such units are readily accessible to and usable by disabled persons; 2) the doors allowing passage into and within such units must accommodate wheelchairs; and 3) all units must contain adaptive design features.¹¹

The Federal Department of Housing and Urban Development (HUD) also recommends, but does not require, that the design, construction and alteration of housing units incorporate, wherever practical, the concept of visitability. This recommendation is in addition to requirements of Section 504 and the Fair Housing Act. Recommended construction practices include wide enough openings for bathrooms and interior doorways and at least one accessible means of egress/ingress for the handicapped to each unit.¹²

The City's adopted Building Code contains and incorporates the latest accessibility standards promulgated by the state and federal government. The City checks plans for compliance with State and Federal accessibility law so that privately owned and publicly assisted housing with four or more units meets accessibility requirements of the Fair Housing Act. The City of Hawthorne enforces all federal and state accessibility laws but does not require accessibility standards in excess of state and federal law.

Reasonable Accommodation

Because a significant portion of the Hawthorne housing stock was built well before the advent of modern accessibility standards, there are times when residents need to modify their home to allow access by a person with a disability. The City encourages property owners to install features that accommodate people with disabilities (e.g., ramp to the front door). Such requests are approved upon payment of building permit and plan check fees, as applicable.

In 2001, the State Office of the Attorney General issued a letter encouraging local governments to adopt a reasonable accommodation procedure.¹³ The Department of Housing and Community Development (HCD) has also urged the same. The federal Fair Housing Act and California Fair

¹¹ Section 804(f)(3)(C) of the Fair Housing Act

¹² HUD Directive, Number 00-09.

¹³ State Office of Attorney General, May 15, 2001

Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodation when such accommodation may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The State Attorney also provided guidance on the preferred procedure.

In 2008, Hawthorne adopted a “Fair Housing Reasonable Accommodation” process codified under Chapter 17.41 of the Zone Code. The code provides a procedure to evaluate requests for reasonable accommodation related to specific applications of the zoning law in order to assure that no person is discriminated against because of protected status by being denied an equal opportunity to use and enjoy a dwelling and to authorize the application of exceptions to the zoning law if warranted.

An application for a reasonable accommodation follows the following timeline: A Notice of Decision is provided within 45 days by the Director of Planning following the acceptance of a complete application. The Director of Planning may deny, approve, or conditionally approve the request for reasonable accommodation. Any person aggrieved or affected by a decision of the Planning Director in granting or denying a request for reasonable accommodations may appeal the decision to the City Council.

Permit Processing

Development permit procedures are designed to ensure that residential development proceeds in an orderly manner so as to ensure the public’s health, safety, comfort, convenience, and general welfare. Although permit processing procedures are a necessary step, unduly burdensome procedures can subject developers to considerable uncertainty, lengthy delays, and public hearings that cumulatively make a project financially infeasible.

State law requires communities work toward improving the efficiency of building permit and review processes by providing one-stop processing, thereby eliminating the necessary duplication of effort. The Permit Streamlining Act helped reduced governmental delays by limiting processing time in most cases to one year and requiring agencies to specify the information needed to complete an acceptable application.¹⁴

The City development approval process is designed to accommodate, not hinder, development. The City of Hawthorne is committed to making a determination as to the completeness of an application within 30 days of submittal. Once a project is deemed complete, it is scheduled for design review.

With respect to design review approval, the Director of Planning reviews the application for completeness and City staff reviews the proposed project for compliance with regulations. City staff makes a recommendation to the Planning Commission, who can approve in full or in part, conditionally approve in full or in part, modify, or deny the application. In other cases, the Director of Planning has approving authority or can refer cases to the Planning Commission. The City Council retains the authority to hear appeals; otherwise, the decision of the Director of Planning or the Planning Commission is final. To minimize the time required for review, design review is

¹⁴ Government Code Section 65920 et seq.

done concurrently with the processing of all other permits required of the same project. If the project is approved, an approval letter, including the conditions of approval, is sent to the applicant. The project only proceeds to the City Council if it requires a legislative act such as a General Plan Amendment or Zone Change.

The project approval process is identical for single-family and multiple-family residential projects. If a housing project does not require a discretionary approval the average time for processing a plan check is 4-8 weeks. If the project requires a discretionary approval process, due to noticing requirements, project revisions, and the creation of staff reports, project processing typically takes eight to twelve weeks. If the project requires a legislative act by the City Council such as a General Plan Amendment or Zone Change in conjunction with the discretionary project, an additional five to six weeks is typically required to allow for preparation for and scheduling of the public hearing.

Processing times vary with the complexity of the project. Single-family homes and other minor tenant improvements can typically be processed with a 3-4 week turnaround time. Other projects requiring Conditional Use Permits, Zoning Amendments, or other discretionary actions necessitate a more complex level of review, resulting in a longer processing timeline. Based on this information, the permit procedures and processing timeframes are appropriate and do not appear to constrain the development of housing.

Assessment

HCD reviews development processing procedures to ensure that such procedures facilitate and encourage the construction of housing for all income levels. HCD often considers that a conditional use permit for multi-family housing subjects the project to unfounded neighborhood criticism that can often lead to rejection of a project that otherwise complies with City regulations. The City is committed to providing sites that are capable of providing housing accommodation that meets its fair share of the Regional Housing Need Assessment (RHNA). The removal or mitigation of impediments that prevent achievement of this goal is essential.

State law prohibits a local agency from disapproving a low-income housing development, or imposing conditions that make the development infeasible, unless one of six conditions exists. Three conditions are of most importance: 1) the project would have an unavoidable impact on health and safety which cannot be mitigated; 2) the neighborhood already has a disproportionately high number of low income families; or 3) the project is inconsistent with the general plan and the housing element is in compliance with state law.¹⁵

Community Representation

The City values citizen input on how well city government serves its residents. The City Council relies on its Planning Commission, advisory commissions, and boards to provide advice and recommendations in areas of City services. Hawthorne makes an effort to ensure that advisory boards and commissions reflect the diversity of the City's residents. The Planning Commission makes recommendations to the City Council that have the potential to affect land use, building, and other policies that may impact fair housing choice.

¹⁵ Government Code Section 65589.5

Public Housing Authority (PHA) Tenant Selection Procedures

The Housing Authority of the City of Hawthorne is the Public Housing Authority (PHA) providing public housing in the area. An examination of the PHA's tenant selection procedures did not reveal any impediments to fair housing choice. An examination of the PHA's selection procedures did not reveal any impediments to fair housing choice. Based on information provided by the Housing Authority, no complaints were received from prospective tenants alleging discrimination or unfair practices in the Housing Authority's selection of tenants to occupy public housing projects.

Residential Anti-Displacement Policy

It is the policy of the City of Hawthorne to comply with the requirements of Section 104(d) of the Housing and Community Development Act of 1974 with respect to the prevention and minimization of residential displacement as a result of the expenditure of HUD assistance.

D. Housing—Employment—Transportation Linkage

The City of Hawthorne has numerous plans that impact housing opportunity, provision of public services, and access to public transit within the community. These plans include the City's General Plan, Housing Element, Consolidated Plan, Redevelopment Implementation Plan, and County Housing Authority Plan.

This section first provides details on how the City of Hawthorne and other agencies further fair housing for City residents through housing programs, employment, and services. The section concludes with an analysis of transit policies and services to determine if there are impediments to fair housing that are apparent as a result of the locations and concentrations of housing and employment centers as related to public transportation routes in the City. Each issue area is discussed below:

Housing Programs

The 2013-2021 Housing Element sets forth the housing goals, policies, programs, and objectives to address the identified housing needs and constraints, utilizing the resources available to the City. There are five major issue areas:

- Conserve and improve the condition of the existing affordable housing stock;
- Assist in the development of adequate housing to meet the needs of low and moderate income households;
- Remove, to the extent feasible, constraints to the development, improvement, and preservation of housing;
- Identify adequate housing sites which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all residents; and
- Assure equal housing opportunity for all residents.

The following sections describe each of the issues and policies to be implemented in the City to achieve its housing goals during the 2013-2021 Housing Element planning period:

Goal No. 1: The City of Hawthorne will provide a variety of types and adequate supply of housing to meet the existing and future needs of the community.

- Policy 1.1: Encourage the upkeep, maintenance and rehabilitation of existing housing units through code enforcement and programs for the rehabilitation of substandard and deteriorating units.
- Policy 1.2: Preserve the affordability of assisted rental projects in the City.
- Policy 1.3: Promote the types of housing in new residential developments that are compatible with the character of the surrounding housing stock.
- Policy 1.4: Continue to explore programs and funding sources designed to maintain and improve the existing housing stock.

Goal No. 2: Provide opportunity for increasing the supply of affordable housing in the City, with special emphasis on housing for special needs groups.

- Policy 2.1: Pursue different funding mechanisms for the construction of housing for seniors, persons with disabilities (including persons with developmental disabilities), large families, homeless and at-risk of homeless.
- Policy 2.2: Provide incentives for new construction of affordable housing. Encourage provisions of units with three or more bedrooms to provide adequately sized housing for large families.
- Policy 2.3: Expand housing options through high-density multi-family and mixed use developments in targeted areas.
- Policy 2.4: Facilitate the provision of rental assistance to extremely low and very low income households.
- Policy 2.5: Support the development of affordable ownership housing for first-time homebuyers
- Policy 2.6: Promote homeownership to increase neighborhood stability and provide increased housing choice.
- Policy 2.7: Emphasize ownership housing as a preferred tenure form for new housing to achieve a tenure distribution that is consistent with national and regional trends.
- Policy 2.8: Cooperate with neighboring cities to identify resources for sheltering homeless persons.

Goal No. 3: The City of Hawthorne will minimize the impact of governmental constraints on housing construction and cost.

- Policy 3.1: Monitor procedures and codes to ensure streamlined case processing and permit issuance procedures, as well as monitor regulations, ordinances, code and standards to minimize government impacts on development costs.
- Policy 3.2: Encourage the use of innovative construction and design techniques to reduce housing costs.

- Policy 3.3: Encourage the use of special development zones and other mechanisms to allow more flexibility in housing developments.
- Policy 3.4: Review ways to provide zoning, land division, and construction incentives to reduce the cost of new and rehabilitated housing.

Goal No. 4: The City of Hawthorne will provide adequate residential sites through appropriate land use designation and zoning to accommodate the City’s share of regional housing needs.

- Policy 4.1: Implement land use policies that allow for a range of residential densities.
- Policy 4.2: Maintain an up-to-date inventory of vacant and underutilized residential and mixed use sites and assist residential developers in identifying land suitable for housing development.
- Policy 4.3: Assist in marketing key residential sites to the real estate and development community.
- Policy 4.4: Encourage residential development in the Mixed Use Overlay areas.
- Policy 4.5: Continue to allow second residential units on single-family parcels as a means of providing additional rental housing.
- Policy 4.6: Encourage, at appropriate locations, development at maximum densities permitted under the General Plan, and encourage use of density bonuses for inclusion of affordable units.

Goal No. 5: The City of Hawthorne will promote equal opportunity for all residents to reside in the housing of their choice.

- Policy 5.1: Enforce the fair housing laws prohibiting arbitrary discrimination in the building, financing, selling or renting of housing on the basis of race, religion, sex, age, marital status, ancestry, national origin, color, familial status, disability, source of income, or sexual orientation.
- Policy 5.2: Promote housing along with supportive services to meet the special needs of certain segments of the population, including seniors, single-parents, the homeless, and persons with disabilities (including those with developmental disabilities).

**Table IV-IX
Major Employers in Hawthorne**

Name of Business or Institution	Number of Employees	Percentage of Total City Employment	Type of Business
Space Exploration Technologies	5,352	11.74%	Aerospace
Hawthorne School District	709	1.55%	Municipal/Education
City of Hawthorne	367	0.80%	Municipal Government
Teledyne Relays	343	0.75%	Manufacturing/ Aerospace/ Communications/ Medical
Triumph Aerostructures (formerly Vought Aircraft)	326	0.71%	Aerospace
OSI Systems Inc.	307	0.67%	Manufacturing/ Aerospace/High Tech
Home Depot	271	0.59%	Retail
Wiseburn Unified School District	255	0.56%	Municipal/Education
Lithographix Inc.	254	0.56%	Business Services
Expeditors	250	0.55%	Business Services/ Logistics/ Shipping
Total	8,434	18.48%	
Total City Employment	45,600		

Source: City of Hawthorne Comprehensive Annual Financial Report, Fiscal Year ended June 30, 2018.

Major Employers

Of Hawthorne's top 10 employers in 2009, three are aerospace firms, four are retail sales, two are government or quasi-governmental agencies and one is a healthcare provider. Hawthorne's excellent access to the 405, 105 and 110 freeways gives residents access to other job centers such as the Port of Los Angeles, the Port of Long Beach and Downtown Los Angeles. **Table IV-IX** lists the major employers in Hawthorne.

Public Services and Facilities

A variety of public services and facilities are available to Hawthorne residents. Some of the key facilities and services are identified in **Table IV-X**.

**Table IV-X
Public Services and Facilities**

Public Facility	Location
City Hall	4455 W. 126th Street
Eucalyptus Park	12100 S. Inglewood Avenue
Glasgow Place Park	13500 Glasgow Place
Holly Park	2058 W. 120 th Street
Hollyglen Park	5255 W. 137 th Street
Jim Thorpe Park	14100 S. Prairie Avenue
Memorial Park	3943 El Segundo Boulevard
Ramona Park	4622 W. 136 th Street
Zela Davis Park	3650 W. 133 rd Street
Bicentennial Park	13110 S. Doty Avenue
Good Neighbors Park	3838 Doty Avenue
Eucalyptus Skate Park	12100 S. Inglewood Avenue
Hawthorne Pool	12501 Inglewood Avenue
Betty Ainsworth Sports Center x	3851 W. El Segundo Boulevard
Memorial Center	3901 W. El Segundo Boulevard
Senior Center	3901 W. El Segundo Boulevard
Hawthorne Public Library	12700 Grevillea Avenue

Source: City of Hawthorne, 2019. <http://www.cityofhawthorne.org/parks-locations>

Housing—Employment—Transportation Linkage

Public transit helps move people who cannot afford personal transportation or who elect not to drive. Elderly and disabled persons also rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Many lower income persons are also dependent on transit to go to work. Public transit that provides a link between job opportunities, public services, and affordable housing helps to ensure that transit-dependent residents have adequate opportunity to access housing, services, and jobs.

Airports. Los Angeles International Airport (LAX) is located only 6.4 miles to the west of the City. The Hawthorne Municipal Airport, is located adjacent to Crenshaw and 120th St can accommodate a variety of corporate jets (fixed wing stage three or better) on its 4,900 foot runway. These include the Gulfstream V, Gulfstream IV, Twin Engine Beechcraft King Aire Turbo-Prop and Citation 10 Jets. The Hawthorne Airport also regularly accommodates helicopters, including HStars, ND 500's, Bell 308 and Jet Rangers. The City of Hawthorne also offers a shuttle service which can be made available to transport private aircraft users to destinations within the City.

Local and Regional Services. The Los Angeles County Metropolitan Transportation Authority (MTA) serves as transportation planner and coordinator, designer, builder and operator for one of the country's largest, most populous counties. More than 9.6 million people – nearly one-third

of California’s residents – live and within MTA’s 1,433-square-mile service area. MTA operates fixed transit routes throughout the City of Hawthorne connecting Hawthorne residents and businesses to the rest of Southern California.

Transit routes within Hawthorne are situated to provide service throughout the City’s residential and commercial corridors and to provide access to key points of interest throughout the City. There are 10 fixed routes operating within the City of Hawthorne (See **Table IV-XI**). Most routes begin service by 6:00 a.m. and cease operation by 8:00 p.m.. All busses are equipped with lifts to carry wheelchairs and other mobility devices allowing people with a disability to board buses. Bicycle racks are also available for cyclists wishing to use the bus.

Bus Lines. The MTA Bus Line #209, stops at Van Ness and 120th Street. The 209 bus line runs North/Southbound from Vermont and 120th Street, to Gardena (Normandie & 135th), Hawthorne (Van Ness & Imperial), Inglewood (Van Ness & Manchester), Hyde Park (Van Ness & Slauson), Jefferson Park (Arlington & Adams) to the Wilshire/Western Station.

Table IV-XI
MTA Bus Lines in Hawthorne

Line	Description
40	South Bay Galleria - Union Station via Hawthorne Bl, Crenshaw Bl & ML King Bl
120	El Segundo - Willowbrook via Imperial Hwy
125	El Segundo - Downey via Rosecrans Av
126	Manhattan Beach - Hawthorne Metro Rail Station via El Camino College
209	Metro Local (Athens - Wilshire Center via Van Ness Ave & Arlington Ave)
210	South Bay Galleria – Hollywood via Crenshaw Bl
211, 215	South Bay Galleria - Redondo Beach via Prairie Av, Inglewood Av
710	Metro Rapid (South Bay Galleria – Wilshire Center via Crenshaw Bl)
740	Metro Rapid (South Bay Galleria - Downtown LA via Hawthorne Bl, Crenshaw Bl & M.L. King Bl)

Source: Metropolitan Transit Authority, 2015.

In compliance with ADA and Title VI of the Civil Rights Act, the MTA strives to ensure that its services (including over 200 bus and rail routes) are fully accessible to all of its customers, including those with disabilities.

Metro is also the primary funding source for Access Services, the federally-required ADA paratransit service provider for Los Angeles County. This service is offered to individuals whose disabilities prevent them from independently using regular bus or rail service. It is comparable to fixed-route service and offers curb-to curb service during hours when local bus service is provided. For more information, please call Access Services Incorporated at 1.800.827.0829.

Transit fares depend on the type of user and number of trips purchased. The standard full fare is \$1.75 for a one-way trip, with seniors and disabled persons eligible for a discounted rate of \$0.75. Children age 5 and under may ride MTA busses for free (maximum of two children per

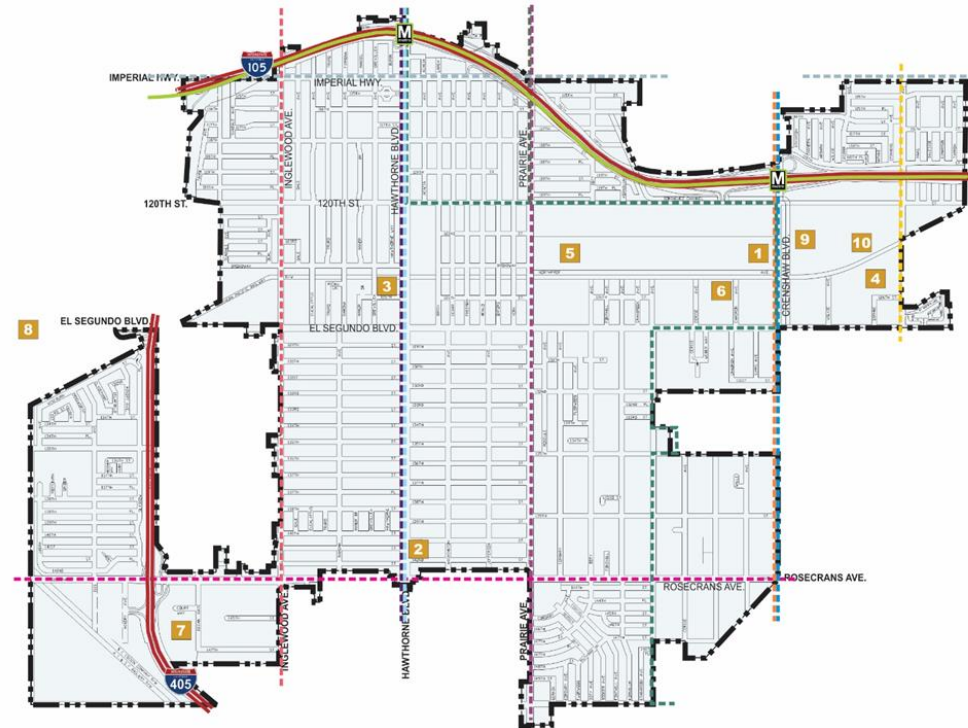
paying adult). A 30-day pass is available for adults (\$100.00), college/vocational students (\$43.00), and seniors/disabled (\$20.00).

The MTA Green Line station is conveniently located at Crenshaw and 120th Street. The Green Line begins its route at Marine Avenue in Redondo Beach, travels north on Aviation and east on the I-105 Freeway eventually terminating in Norwalk. The Green Line offers an LAX shuttle connection point and intersects with the Red Line which travels between Downtown Los Angeles and Long Beach.

Service Standards. The MTA has adopted service standards to ensure a high level of service and equitable distribution of services among the many communities served. Perhaps the most important indicator is route coverage. All areas having a minimum residential density of 3.5 dwelling units per acre or employment density of 10 jobs per acre, as measured over an area of 25 acres, should be provided with a transit service that places 90% of residences and jobs within one-half mile of a bus stop. To provide adequate access to persons with disability, special service is available through the MTA service area within a 3/4 mile radius either side of an existing MTA fixed-route.

Maps IV-II and IV-III show major employers and public facilities in relation to public transportation routes. All major employers and public facilities are located within 1/2 of a mile from a transit line, as is the City's project-based Section 8 affordable housing. MTA maps indicate that the City of Hawthorne is well-served; therefore, there are no transit-related AI findings.

Map IV-II Transportation Lines – Principal Employers



City of Hawthorne



MAJOR EMPLOYERS

- 1 Space Exploration Technologies
- 2 Hawthorne School District
- 3 City of Hawthorne
- 4 Teledyne Relays
- 5 Triumph Aerostructures
- 6 OSI Systems Inc.
- 7 Home Depot
- 8 Wiseburn Unified School District
- 9 Lithographix Inc.
- 10 Expeditors

PUBLIC TRANSPORTATION

- ROUTE 211
- ROUTE 215
- ROUTE 209
- ROUTE 210
- ROUTE 126
- ROUTE 125
- ROUTE 120
- ROUTE 710
- ROUTE 740
- ROUTE 40
- GREEN LINE

Map IV-III Transportation Lines – Public Services and Facilities



City of Hawthorne



PUBLIC SERVICES AND FACILITIES

- | | |
|----------------------|----------------------------------|
| 1 City Hall | 10 Bicentennial Park |
| 2 Eucalyptus Park | 11 Good Neighbors Park |
| 3 Glasgow Place Park | 12 Eucalyptus Skate Park |
| 4 Holly Park | 13 Hawthorne Pool |
| 5 Hollyglen Park | 14 Betty Ainsworth Sports Center |
| 6 Jim Thorpe Park | 15 Memorial Center |
| 7 Memorial Park | 16 Senior Center |
| 8 Ramona Park | 17 Hawthorne Public Library |
| 9 Zela Davis Park | |

PUBLIC TRANSPORTATION

- ROUTE 211
- ROUTE 215
- ROUTE 209
- ROUTE 210
- ROUTE 126
- ROUTE 125
- ROUTE 120
- ROUTE 710
- ROUTE 740
- ROUTE 49
- GREEN LINE

V. Analysis of Current Fair Housing Activity

Fair housing services include investigation of discrimination complaints, auditing and testing, education, and outreach. Landlord/tenant counseling services involve informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations and mediating disputes between landlords and tenants. This section reviews the fair housing services available in Hawthorne, the nature and extent of fair housing complaints, and results of fair housing testing/audits.

The City of Hawthorne contracts with the Housing Rights Center (HRC) for fair housing services. Funded primarily with Community Development Block Grant (CDBG) funds and donations, HRC provides programs and services focused on eliminating housing discrimination, general housing assistance, and education and outreach activities to residents in the Los Angeles and Ventura counties. The comprehensive Fair Housing services include:

- **Housing Discrimination Complaint Investigation:** HRC investigates allegations of housing discrimination under the fair housing laws. The Investigations Department conducts fact finding investigations and proposes potential solutions for victims of housing discrimination. Case resolution can include mediation, conciliation, a referral to state and federal administrative agencies, or referral to HRC's Litigation Department.
- **Fair Housing Education and Outreach:** HRC has established an effective and comprehensive outreach and public education program designed to raise awareness of the fair housing laws that protect individuals, often in traditionally underserved communities, against housing discrimination.

The Outreach Department develops and distributes educational literature and resources that describe ways to prevent housing injustices and the applicable laws that protect against discrimination. The materials are made available free to the public in various languages including English, Spanish, Korean, Mandarin, Armenian, Cantonese and Russian.

- **Tenant and Landlord Counseling:** HRC provides free telephone and in-person counseling to both tenants and landlords regarding their rights and responsibilities under California law and local city ordinances. Housing Counselors are trained in landlord/tenant law. Counselors are also trained to ask basic questions that are likely to reveal potential discrimination without prompting the caller to prematurely identify discrimination as the cause.

A. Fair Housing Education

HRC provides a comprehensive, extensive and viable education and outreach program and services. The purpose of this program is to educate tenants, landlords, owners, realtors and property management companies on fair housing laws; to promote media and consumer interest and to secure grass root's involvement within the community. HRC conducts outreach and education activities that are vital to improve compliance with the law as follows:

- **Conduct Training Workshops for Consumers:** The general types of activities conducted for consumers include a comprehensive fair housing presentation, a discussion about common forms of housing discrimination, and a question-and-answer session. During these workshops, HRC also distributes literature that consumers can refer to when specific issues arise.
- **Conduct Training Workshops for Housing Providers:** The general types of activities conducted for housing providers include monthly Fair Housing Certification Training seminars for housing industry professionals at their main office located in Los Angeles. These seminars are tailored to provide detailed analysis of fair housing laws and interpretation, with specific information on discrimination against families with children, people with disabilities, sexual harassment, hate crimes, and advertising.
- **Increase Public Awareness:** The general types of activities conducted to increase public awareness includes developing and distributing hundreds of pieces of multi-lingual literature in the City, aimed at a variety of audiences, describing how housing injustices arise, the laws that protect against housing discrimination, and ways to prevent housing inequality. Materials are distributed during neighborhood visits and via mailings through the City, can also be found in a variety of languages.

B. Fair Housing Enforcement

Discrimination Complaint Intake and Investigation

HRC responds to discrimination inquiries and complaints in an expedient manner, relying on over 45 years of experience in the industry. Determining whether a client is inquiring regarding a fair housing discrimination problem or a non-discrimination landlord/tenant or other problem can be difficult. Often what may appear at first to be a simple landlord/tenant dispute turns out to be a situation where a landlord has violated one or more fair housing laws.

HRC investigates State and Federal protected categories which include Race, Color, National Origin, Religion, Sex, Familial Status, Disability, Marital Status, Sexual Orientation, Ancestry, Age, Source of Income and Arbitrary Characteristics. The State of California has identified Marital Status, Sexual Orientation, Ancestry, Age, Source of Income and Arbitrary Characteristics as additional protected classes.

Once a Fair Housing complaint is received, HRC educates the complainant of their rights and responsibilities. The complainants are advised of possible further investigation depending on the complaint.

HRC uses government regulated testing methodologies to enforce, support, and conduct fair housing investigations. A housing discrimination complaint can be investigated through testing, the gathering of witness statements and through research surveys. Based on the details provided by the complainant HRC will either investigate the complaint or advise the complainants of their other options, which include: conciliation, Housing and Urban Development (HUD), Department of Fair Employment and Housing (DFEH), Attorney or Department of Justice (DOJ).

In the most recent period for which data is available as of this writing, there were 174 discrimination complaints made to HRC. **Table V-I** shows the basis of HRC discrimination complaints.

**Table V-I
Fair Housing Discrimination Complaints by Basis**

Basis	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	Total
Age	1	0	0	0	0	1
Ancestry	0	0	0	0	0	0
Arbitrary	1	1	0	0	0	2
Color	0	0	0	0	0	0
Familial Status	7	5	6	13	7	38
Gender	1	0	0	1	3	5
Marital Status	0	0	0	0	0	0
Mental Disability	4	5	4	3	5	21
National Origin	0	0	0	0	0	0
Physical Disability	20	20	15	20	6	81
Race	4	7	2	6	3	22
Religion	0	0	0	0	0	0
Sexual Orientation	1	0	0	1	0	2
Source of Income	1	0	0	1	0	2
Total:	40	38	27	45	24	174

Source: Housing Rights Center, 2015.

Physical disability and familial status were the most frequently cited reasons why complainants felt discriminated against.

Table V-II shows the findings and disposition of the 61 discrimination complaints received by HRC in the last five years from Hawthorne residents. It should be noted that the 174 citations of the basis of a given complaint represent a duplicated count—there were only 61 discrimination complaints, of which many had more than one basis.

**Table V-II
Fair Housing Discrimination Complaints: Findings and Disposition**

Findings	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	Total
Inconclusive Evidence	5	8	2	7	1	23
No Evidence	0	0	0	0	0	0
Pending Finding	0	0	0	0	1	1
Sustains Allegation	3	5	7	15	7	37
Total:	8	13	9	22	9	61
Disposition	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	Total
Client Withdrew	1	0	1	1	1	4
No Enforcement Possible	3	9	5	6	3	26
Referred-Private Attorney	0	0	0	0	0	0
Referred to DFEH	0	0	0	0	0	0
Referred to HUD	0	0	0	0	0	0
Pending Finding	0	0	0	3	1	4
FHF Successful Conciliation	4	4	3	12	4	27
Total:	8	13	9	22	9	61

Source: Housing Rights Center, 2015.

C. National Fair Housing Enforcement

Under the Fair Housing Act, HUD has the authority to investigate, attempt to conciliate, and, if necessary, adjudicate complaints of discrimination involving, among other things, home sales, rentals, advertising, mortgage lending and insurance, property insurance, and environmental justice. HUD also investigates complaints alleging discriminatory zoning and land use, but must refer these complaints to the U.S. Department of Justice for enforcement.

HUD shares its authority to investigate housing discrimination complaints with state and local government agencies that participate in the Fair Housing Assistance Program (FHAP). To participate in the FHAP, a jurisdiction must demonstrate that it enforces a fair housing law that provides rights, remedies, procedures, and opportunities for judicial review that are substantially equivalent to those provided by the federal Fair Housing Act. As of March 2020, there were 77 FHAP agencies across the country; however, the only FHAP agency in California is the State Department of Fair Employment and Housing (DFEH). In other states, county governments, municipal governments and community-based organizations are approved as FHAP agencies. HUD pays FHAP agencies for each complaint they investigate, based on the timeliness and quality of the investigation. In addition, HUD provides funding to FHAP agencies for capacity-building, training, and information systems.

A person who believes that he or she has experienced, or is about to experience, housing discrimination may file a complaint or may have a complaint filed on his or her behalf by someone else, such as a parent, child, spouse, or guardian. HUD and FHAP agencies accept complaints in person, by telephone, through the mail, and through their websites. If HUD receives a housing discrimination complaint where the alleged discriminatory act occurred within the jurisdiction of one of its FHAP agencies, HUD is required under the Fair Housing Act to refer the complaint to that agency.

If HUD determines there is reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, it issues a charge of discrimination. The parties may choose to pursue the matter in an administrative proceeding or in federal district court. If a FHAP agency finds reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, the agency or attorneys for the state or locality litigate that complaint in an administrative proceeding or in civil court.

HUD annually compiles data on housing discrimination complaints filed with HUD or FHAP agencies and issues an Annual Report on Fair Housing to Congress. The most recent Annual Report on Fair Housing was issued in 2017. The Annual Report on Fair Housing indicates that the overall number of housing discrimination complaints filed with HUD and FHAP declined each fiscal year from 2014-2017. **Table V-III** provides information on the complaints received by HUD and FHAP during this period for the top eight bases of discrimination.

**Table V-III
HUD and FHAP Discrimination Complaints, 2017**

	FY 2017		FY 2016		FY 2015		FY 2014	
	No.	%	No.	%	No.	%	No.	%
Disability	4,865	59.4%	4,908	58.5%	4,605	55.8%	4,621	54.4%
Race	2,132	26.0%	2,154	25.7%	2,291	27.8%	2,383	28.1%
Familial Status	871	10.6%	882	10.5%	1,031	12.5%	1,051	12.4%
National Origin	826	10.1%	917	10.9%	898	10.9%	1,067	12.6%
Sex	800	9.8%	800	9.5%	915	11.1%	879	10.4%
Religion	232	2.8%	204	2.4%	225	2.7%	223	2.6%
Color	192	2.3%	143	1.7%	151	1.8%	146	1.7%
Retaliation	834	10.2%	785	9.4%	832	10.1%	867	10.2%
Number Filed:	8,186		8,385		8,246		8,489	

Source: FHEO Annual Report FY 2017, FHEO Annual Report FY 2016, FHEO Annual Report FY 2014 and 2015

https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport

Note: Percentages do not total 100 percent because complaints may contain multiple bases. Percentages are rounded to the nearest percentage point.

As shown in the table, while the total number of discrimination complaints has remained relatively flat over this period, the percentage of complaints based on discrimination due to disability has been trending upward. Familial status, the third most common basis of housing complaints, has been decreasing over the last several years. Discrimination based on familial status covers acts of discrimination against parents or guardians of a child under the age of 18, the parent’s or guardian’s designee, and persons who are pregnant or in the process of obtaining legal custody of a child under the age of 18.

The Department of Fair Employment and Housing (DFEH) is the State agency responsible for investigating housing discrimination complaints. The Department of Fair Employment and Housing's mission is to protect Californians from employment, housing and public accommodation discrimination, and hate violence. During the prior four years, DFEH has not received any cases from the City of Hawthorne. All complaints to HUD and FHAP agencies must specify the section of the Fair Housing Act that was allegedly violated or would have been violated. HUD and FHAP agencies record these discriminatory practices in categories known as “issues.” **Table V-IV** shows the number of complaints filed with HUD and FHAP agencies from 2014 to 2017, broken down by issue. If a single complaint alleged multiple issues, it was counted under each issue alleged.

**Table V-IV
FY 2014 – 2017 Issues in HUD & FHAP Complaints**

Complaint Issue	FY 2014		FY 2015		FY 2016		FY 2017	
	No.	%	No.	%	No.	%	No.	%
Refusal to Sell	154	1.8%	116	1.4%	162	1.9%	148	1.8%
Refusal to Rent	2,268	26.7%	2,317	28.1%	2,343	27.9%	2,414	29.5%
Discriminatory Terms, Conditions, Privileges, Services, & Facilities in the Rental or Sale of Property	5,869	69.1%	5,353	64.9%	5,859	69.9%	5,640	68.9%
Discriminatory Notices, Statements or Advertisements	983	11.6%	920	11.2%	877	10.5%	829	10.1%
Otherwise deny or make housing unavailable	655	7.7%	745	9.0%	798	9.5%	813	9.9%
Other Discriminatory Acts	383	4.5%	413	5.0%	475	5.7%	608	7.4%
False Denial or Representation of Availability	220	2.6%	187	2.3%	177	2.1%	181	2.2%
Failure to Permit a Reasonable Modification	181	2.1%	179	2.2%	191	2.3%	212	2.6%
Failure to Make a Reasonable Accommodation	2,676	31.5%	2,836	34.4%	3,376	40.3%	3,366	41.1%
Non-Compliance with Design and Construction Requirements	109	1.3%	77	0.9%	67	0.8%	98	1.2%
Discriminatory Financing	399	4.7%	237	2.9%	253	3.0%	183	2.2%
Steering	80	0.9%	60	0.7%	74	0.9%	74	0.9%
Discriminatory Brokerage Service	41	0.5%	55	0.7%	61	0.7%	49	0.6%
Using Ordinances to discriminate in zoning and land use	67	0.8%	39	0.5%	24	0.3%	35	0.4%
Redlining	3	0.0%	13	0.2%	9	0.1%	6	0.1%
Discriminatory Acts under Section 901 (criminal)	5	0.1%	9	0.1%	7	0.1%	14	0.2%
Refusal to Provide Insurance	2	0.0%	2	0.0%	4	0.0%	1	0.0%
Coercion, Intimidation, Threats, Interference, and Retaliation	1,820	21.4%	1,606	19.5%	1,424	17.0%	1,456	17.8%
Blockbusting	5	0.1%	11	0.1%	8	0.1%	7	0.1%
Failure to meet senior housing exemption criteria	0	0.0%	0	0.0%	0	0.0%	3	0.0%
Number of Complaints Filed	8,489		8,246		8,385		8,186	

Source: FHEO Annual Report FY 2017, FY 2016, FY 2014 and 2015.

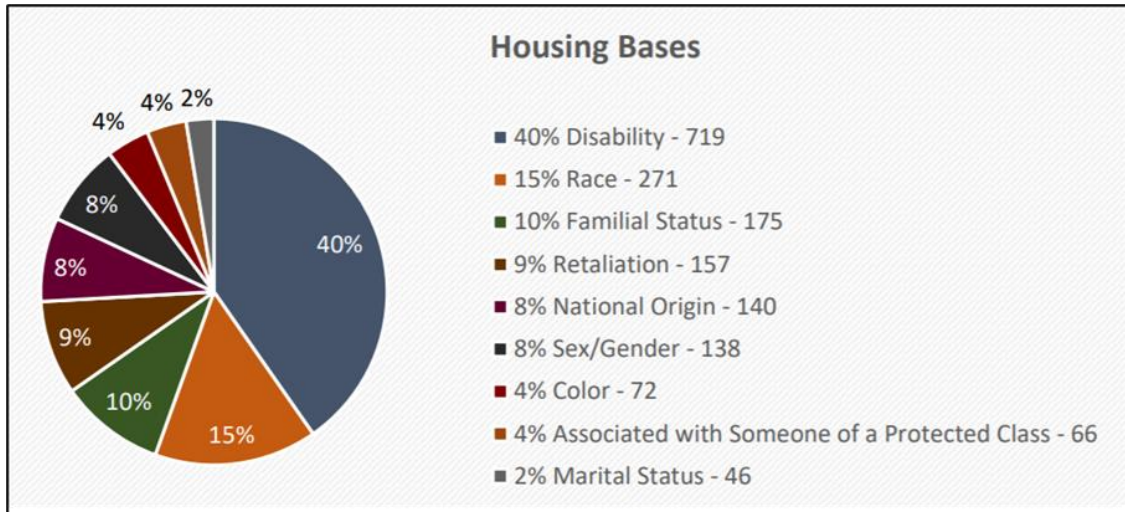
Note: Percentages do not total 100 percent because complaints may contain multiple bases. Percentages are rounded to the nearest percentage point.

D. State of California Fair Housing Enforcement

The State Department of Fair Employment and Housing (DFEH) is the state agency responsible

for investigating housing discrimination complaints. As discussed in the previous section, DFEH is the only HUD-approved FHAP agency in the State of California. DFEH's mission is to protect California residents from employment, housing and public accommodation discrimination, and hate violence. **Figure V-I** provides the basis data from the most recent report available showing the different bases of discrimination associated with 784 cases referred to DFEH from across the state in calendar year 2018.

Figure V-I
State Department of Fair Employment and Housing Cases

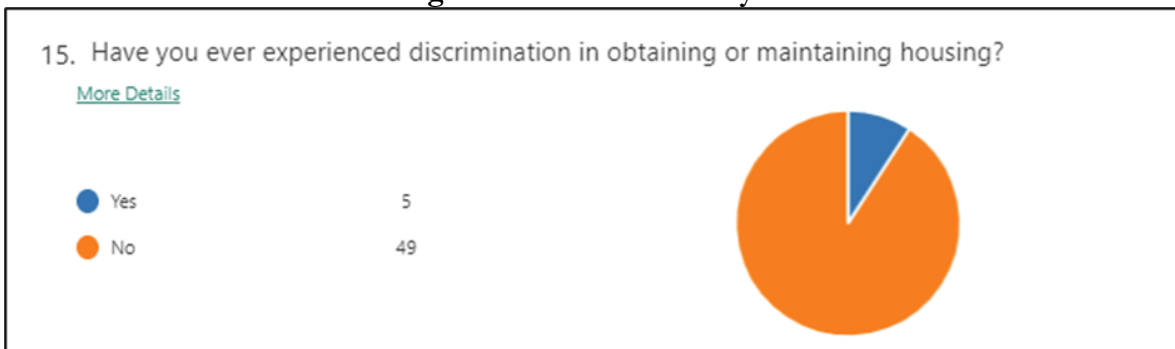


Source: DFEH website:
<https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2020/01/DFEH-AnnualReport-2018.pdf>

E. Hawthorne Resident Perspectives on Fair Housing Choice

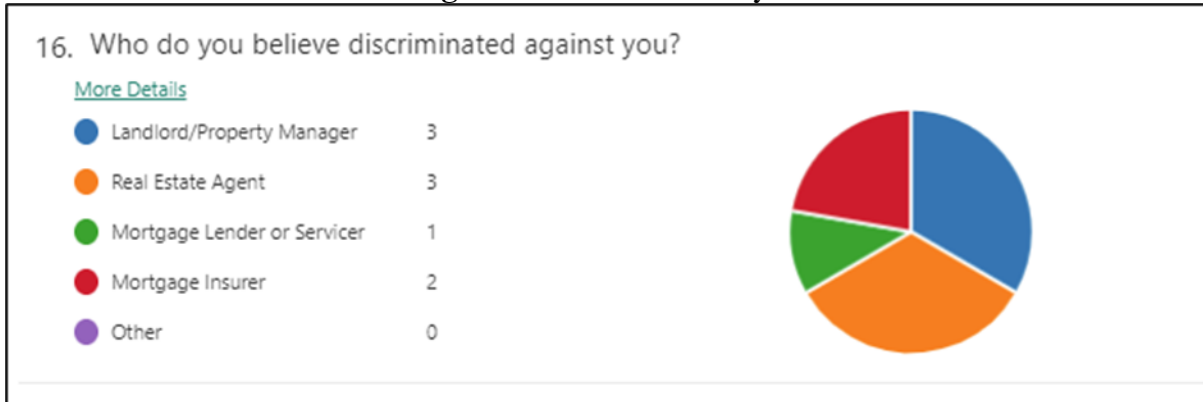
To gather additional perspectives on fair housing choice in Hawthorne, residents responding to the 2020-2024 Resident Survey were asked a series of questions about their personal experience with housing discrimination and whether or not housing discrimination exists in Hawthorne. The results of the survey reveal that 10 percent of the respondents to the fair housing questions have ever experienced discrimination in obtaining or maintaining housing (**Figure V-II**).

Figure V-II
Housing Discrimination Survey Results



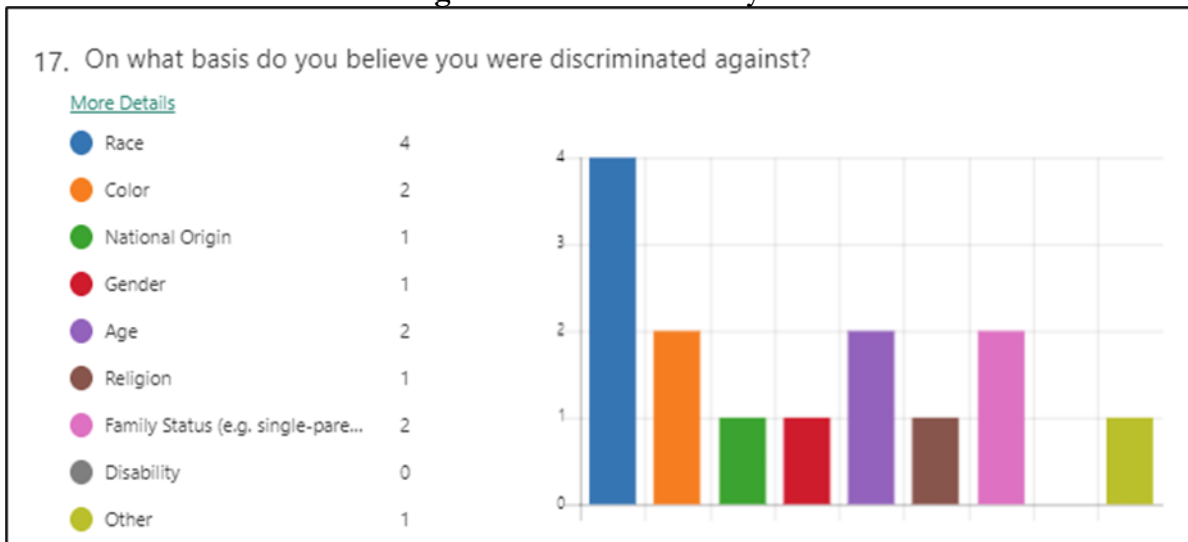
For those respondents who did believe they were discriminated against, most indicated that a landlord, property manager, or real estate agent was responsible (**Figure V-III**).

Figure V-III
Housing Discrimination Survey Results



The leading basis of discrimination among those surveyed was race (**Figure V-IV**). Of those who believed they had been discriminated against, only one in four reported it (**Figure V-V**).

Figure V-IV
Housing Discrimination Survey Results



**Figure V-V
Housing Discrimination Survey Results**



F. Hate Crimes

Hate crimes are violent acts against people, property, or organizations because of the group to which they belong or identify with. The Federal Fair Housing Act makes it illegal to threaten, harass, intimidate or act violently toward a person who has exercised their right to free housing choice. Some examples include threats made in person, writing or by telephone, vandalism of the home or property, or unsuccessful attempts at any of these.

The FBI classifies hate crimes into one of five primary bias motivation categories, including: race, religion, sexual orientation, ethnicity or disability. **Table V-V** summarizes the hate crime incidents by bias motivation as reported by the FBI¹⁶ for calendar years 2015-2018.

**Table V-V
Hate Crime Incidents Reported to the FBI in Hawthorne 2015 - 2018**

Calendar Year	Race/ Ethnicity / Ancestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
2015	3	0	1	0	0	0	4
2016	0	1	0	0	0	0	1
2017	0	0	0	0	0	0	0
2018	3	2	1	0	0	0	6
Total:	6	3	2	0	0	0	11

Source: FBI Hate Crime Incidents by State and Agency, 2015-2018.

<https://www.fbi.gov/services/cjis/ucr/publications#Hate-Crime%20Statistics>

In Hawthorne, there were a total of 11 hate crimes reported to the FBI during 2015-2018. The most prevalent hate crime bias motivation reported was race/ethnicity/ancestry (54 percent of all cases). The relatively low occurrence of hate crimes within the community indicates that hate-motivation does not appear to coincide with the incidence of housing discrimination in Hawthorne and does not indicate an impediment to fair housing choice.

¹⁶ FBI Hate Crime Incidents by State and Agency, 2015-2018. <https://www.fbi.gov/services/cjis/ucr/publications#Hate-Crime%20Statistics>

G. Fair Housing Legal Status

In the last five fiscal years, no cases were filed locally in a court of competent jurisdiction to enforce fair housing laws. There is no litigation to report.

VI. Conclusions and Recommendations

Previous chapters of this AI study examined changes in Hawthorne during the last five years, analyzed public policies for impediments to fair housing, and documented fair housing opportunity in Hawthorne. Building upon the previous analysis, this chapter recommends actions to improve housing opportunity in Hawthorne. An Impediment to Fair Housing Choice is defined as:

Any actions, omissions, or decisions taken because of age, race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of age, race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation or any other arbitrary factor.

A. Prior-Identified Impediments to Fair Housing Choice

HUD requires the City to analyze impediments to fair housing choice that were identified in prior AIs to determine if those impediments have been resolved or if they should remain as part of the AI. The previous AI was adopted in 2015, identifying one impediment.

2015 Impediment No. 1: Discrimination against Persons with Disabilities

The leading basis of discrimination complaints for Hawthorne, California and the United States is disabilities. Complaints on the basis of discrimination against disabled persons accounts for more than half of all fair housing complaints from Hawthorne residents to HRC each year, which is consistent with data from other cities in Southern California for the same time period studied and is consistent with data from HUD and Federal Housing Assistance Programs (FHAP) for that same time period.

2020 Status: Based on the most recent data available, discrimination against persons with disabilities continues to account for most discrimination complaints in California and across the United States. From 2014 – 2017, discrimination complaints on the basis disability accounted for 59.4 percent of all complaints submitted to HUD and continues to be the leading basis of discrimination cited by Hawthorne residents.

Disabled persons are experiencing difficulties when requesting reasonable accommodations or modifications from property owners. In particular, persons with cognitive disabilities experience significantly more problems with these accommodations and are experiencing discrimination in obtaining rental housing.

B. New Impediments to Fair Housing Choice

The 2020 AI did not identify any new impediments to fair housing choice – actions, omissions, or decisions taken because of — or which have the effect of — restricting housing choices or the availability of housing choices on the basis of age, race, color, ancestry, national origin, age,

religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor which restrict housing choices or the availability of housing choices in the City of Hawthorne.

C. Recommendations to Address Impediment(s) to Fair Housing Choice

To address Impediment No. 1, it is recommended that the City of Hawthorne and HRC continue to take steps to expand and conduct fair housing workshops that specifically address the disabled and their particular housing needs and rights. These workshops will inform landlords and housing industry stakeholders about reasonable accommodations and modifications. These expanded workshops should be conducted in Hawthorne and throughout the region.

The recommended timeframe for the implementation of additional workshops is as soon as possible. As such, it is recommended that the disability-focused workshops are specifically included in the Community Development Block Grant (CDBG) subrecipient agreement between the City and HRC for the upcoming 2020-2021 fiscal year.

Appendix A – Signature Page

I, Arnold Shadbeh, City Manager of the City of Hawthorne, hereby certify that this Analysis of Impediments to Fair Housing Choice represents the City’s conclusions about impediments to fair housing choice, as well as actions necessary to address any identified impediments.

Arnold Shadbeh
City Manager

Date