

Analysis of Impediments to Fair Housing Choice (AI)

July 1, 2024-June 30, 2028

Presented to the City Council
November 19, 2024

City of Torrance

Community Development
Department



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Notice of Public Comment Period and Viewing



CITY OF TORRANCE
Community Development Department
3031 Torrance Boulevard
Torrance, CA 90503

NOTICE OF PUBLIC COMMENT PERIOD AND VIEWING

The City of Torrance's Analysis of Impediments to Fair Housing Choice (AI) for the period of July 1, 2024 through June 30, 2028 will be available for public review and comment beginning Friday October 18, 2024. The City of Torrance welcomes any recommendations, suggestions, or other input on this AI.

The City's AI is a comprehensive review of policies, procedures, and practices within Torrance that effect the location, availability and accessibility of housing and the current residential patterns and conditions related to fair housing choice. Fair housing choice should be understood as the ability of persons of similar incomes to have available to them the same housing choices, regardless of race, color, religion, sex, disability, familial status or national origin. An impediment to fair housing choice is an action, omission, or decision taken because of race, color, religion, sex, disability, familial status or national origin that restricts housing choices or the availability of housing choice. It is also any action, omission and/or decision that has this kind of effect. Policies, practices or procedures that appear neutral on their face, but which operate to deny or adversely affect the provision of housing to persons (in any particular protected class) may constitute such impediments.

The analysis of impediments to fair housing choice in any community is a delicate and tedious process. The City recognizes the effect that discrimination has in limiting housing choice and equal opportunity in renting, selling and financing housing. The City continues its commitment to make a significant impact in affirmatively furthering fair housing and eliminating impediments to fair housing choice by offering housing programs without impediments based on race, color, religion, sex, disability, familial status, or national origin. The City continually increases the awareness of the availability and benefits of City programs regarding housing choice and housing assistance through public information to the community. This information is distributed to the community in a number of ways, including notices placed in newspapers, social media outlets, and on the City's website. This proves to be a positive impact on the community by ensuring that the community is aware of the different services provided by the City of Torrance.

The Draft AI covering July 1, 2024-June 30, 2028 will be available for public examination starting Friday October 18, 2024. Persons interested in reviewing the AI may do so by contacting Julia Smith, Business Manager, at (310) 618-5899. The AI is available for public viewing at the City Clerk's Office and Community Development Department, 3031 Torrance Blvd Torrance, CA 90503, as well as on the City's website www.TorranceCA.Gov/ConsolidatedPlan. Citizens wishing to comment on the Draft AI must do so in writing. Written comments will be accepted for a period of thirty days from October 18, 2024 or no later than 5:00 p.m. on Monday, November 18, 2024. Written comments must be addressed to:

City of Torrance
Community Development Department
3031 Torrance Blvd
Torrance, California 90503
Attention: Julia Smith
Business Manager

It is anticipated that the Torrance City Council will take final action on the AI at the City Council meeting to be held on November 19, 2024 at 6:30 PM at the Council Chamber at 3031 Torrance Bl.

NOTICE OF DOCUMENT AVAILABILITY: Notice is hereby given that copies of the Draft AI will be available from October 18, 2024 through November 18, 2024 at the City of Torrance's Community Development Department and City Clerk's Office, as well as on the City's website www.TorranceCA.Gov/ConsolidatedPlan. Interested parties wishing to obtain a copy, in either written or alternate format, should contact Julia Smith.

DATED THIS 17TH DAY OF October, 2024

Published October 17, 2024

REBECCA POIRIER
CITY CLERK

CHAPTER 1 INTRODUCTION

The City of Torrance has committed to overcoming any and all obstacles to fair housing choice throughout the City ensuring opportunities for all residents. The Analysis of Impediments to Fair Housing Choice or "AI" is a requirement imposed on recipients of certain federal grants from the U.S. Department of Housing and Urban Development (HUD). The City of Torrance receives an annual entitlement of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds from HUD.

The regulations that govern these grants (Title 24 Code of Federal Regulations, Part 91) require that each HUD grantee certify as a condition of its grant that the grantee is "affirmatively furthering fair housing." This includes (1) conducting an analysis of impediments to fair housing choice; (2) taking appropriate actions to overcome the effects of impediments identified through that analysis; and (3) maintaining records reflecting the analysis and actions. This AI adheres to the recommended scope of analysis and format in the *Fair Housing Planning Guide* developed by HUD in 1996.

HUD defines the AI as "a comprehensive review of a state's or entitlement jurisdiction's laws, regulations and administrative policies, procedures and practices. The AI involves an assessment of how these laws, regulations, policies and procedures affect the location, availability, and accessibility of housing, and how conditions, both private and public, affect fair housing choice." (*HUD Memorandum, "Analysis of Impediments to Fair Housing Choice Reissuance," September 8, 2004*)

This review and assessment is used to identify actions the grantee will take to improve fair housing. The format of the AI is such that each action is associated with a concern or issue. These are described as "impediments." HUD formally defines an impediment to fair housing as " ... any action, omission, or decision that is intended to or has the effect of restricting a person's choice of housing on the basis of race, color, religion, sex, disability, familial status, or national origin." (*U.S. Department of Housing and Urban Development, Fair Housing Planning Guide, March 1996*)

The framework of impediments and actions is to be used by the grantee to plan its annual actions and to report on actions taken to improve fair housing. This work is accomplished in the City's Annual Action Plan and its Consolidated Annual Performance and Evaluation Report (CAPER), respectively.

Although the AI is not required as part of the annual submission to HUD, HUD recommends that each grantee regularly update its AI. HUD has suggested that the AI be conducted at least as often as the Consolidated Plan, which is required every five years. The City of Torrance recently updated the Five- Year Consolidated Plan for the period July 1, 2023 through June 30, 2028.

A. Purpose of the Report

The Housing and Community Development Act of 1974 requires that any community receiving HUD funds affirmatively further fair housing. Communities receiving HUD entitlement funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, gender, disability, familial status, or national origin
- Promote housing that is accessible to and usable by persons with disabilities
- Comply with the non-discrimination requirements of the Fair Housing Act

These requirements can be achieved through the preparation of an AI. An AI is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing.

It is also an assessment of conditions, both public and private, affecting fair housing choice. An impediment to fair housing choice is defined as any action, omission, or decision that restricts or has the effect of restricting the availability of housing choices of members of the protected classes. This AI will:

- Evaluate population, household, income, and housing characteristics by protected classes
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice where any may exist
- Recommend specific strategies to overcome the effects of any identified impediments

B. Methodology & Organization of the Report

A variety of data sources and planning documents were consulted in the drafting of this AI to provide a quantitative and qualitative overview of past and current housing choice conditions within the City, and to ensure future compliance with fair housing regulations.

Data sources include:

- U.S. Census Bureau (Census)
- American Community Survey (ACS)
- Federal Financial Institutions Examination Council (FFIEC)
- Housing Rights Center
- California Department of Fair Employment & Housing
- American Community Survey (ACS)
- Comprehensive Housing Affordability Strategy (CHAS)

The research, analysis, and consultations required to complete the AI commenced in December 2024. The project was substantially completed by the end of September 2024. A portion of the AI was completed concurrently with the Substantial Amendment to the City's FY 2023-2027 Consolidated Plan. A Community Needs Survey was conducted as part of the planning process. The survey solicited community's input on the City's most

pressing needs, particularly in the areas of housing, parks, community facilities, human services, housing discrimination and barriers to fair housing choice.

As part of the Consolidated Plan process, one (1) public hearing was held to create an open forum for discussion. The public hearing took place in December 2023 and one of the hearing topics was affirmatively furthering fair housing. No comments were received related to fair housing.

The AI report was made available on the City's website, City Clerk Public Notice Board, and the One-Stop Permit Center Bulletin Board. The City Council will hold a public hearing on November 19, 2024, to discuss and potentially adopt the final AI report.

This AI is divided into the following eight chapters:

1. **Introduction** defines "fair housing" and discusses the purpose of the report.
2. **Public Participation** provides detailed information on the engagement process undertaken for the AI including stakeholder, focus groups, public meetings, etc.
3. **Community Profile** provides an overview of the socio-demographic, income, housing cost and affordability, housing characteristics and accessibilities in the City.
4. **Lending Practices** discusses public and private lending practices that shape the ability of individuals and households to obtain housing.
5. **Public Policies** discusses public policies that shape the ability of individuals and households to obtain housing.
6. **Fair Housing Profile** analyzes current public and private sector fair housing programs and activities, and identifies any findings regarding trends and patterns associated with discriminatory housing practices.
7. **Fair Housing Progress** summarizes the actions and recommendations outlined in the 2015 AI and the City's progress to date.
8. **Fair Housing Impediments and Action Plan** presents a set of recommended strategies and action steps to overcome the barriers to fair housing choice identified within the report.

C. Legal Framework

Fair housing choice grants individuals the opportunity to choose where they wish to live. To ensure that all individuals and families are given equal access to housing, the federal government and the State of California have enacted the following laws to prohibit subtle and overt forms of housing discrimination. HUD's Office of Fair Housing and Equal Opportunity has played a lead role in enforcing the Fair Housing Act since its adoption in 1968. The Act prohibits discrimination in the sale, rental, and financing of dwellings based on race, color, religion, national origin, sex, familial status (presence of child under age of 18, and pregnant women), and or disability. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials, and private citizens must embrace if social equity is to become a reality.

1. Federal Fair Housing Act

The Federal Fair Housing Act (FHA) is the protection against discrimination in housing on the federal level. After a lengthy legislative battle, urban riots, and the assassination of Dr. Martin Luther King Jr., the FHA was enacted in 1968. It extended the general discrimination protections included in the 1964 Civil Rights Act into the housing market. FHA prohibits discrimination in housing based on a person's race, color, religion, gender, disability, familial status, or national origin. In addition, HUD issued a Final Rule on February 3, 2012, that prohibits entitlement communities, public housing authorities, and other recipients of federal housing resources from discriminating on the basis of actual or perceived sexual orientation, gender identity, or marital status. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

The FHA covers "dwellings" which are defined as structures designed or occupied as residences or land offered for sale where a residence will be built. A "dwelling" is broadly defined and can include a homeless shelter or a summer home. In some circumstances, exemptions to the FHA includes the following: owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

Equal and unimpeded access to residential housing is a fundamental civil right that enables members of protected classes, as defined in the FHA, to pursue personal, educational, employment, or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials, and private citizens must embrace if social equity is to become a reality.

On June 15, 2020, the Supreme Court issued a decision (*Bostock v. Clayton City*) which held that Title VII's prohibition against sex discrimination includes both sexual orientation and gender identity. On February 11, 2021, HUD issued a memorandum titled, "Implementation of Executive Order 13988 on the Enforcement of the Fair Housing Act." The memorandum states that where reasonable cause exists to believe that discrimination because of sex (including actual or perceived sexual orientation or gender identity) has occurred, FHEO will make a determination of reasonable cause and refer the case to HUD's Office of General Counsel for charge. If the discrimination occurs in conjunction with discrimination because of another protected characteristic, all such bases will be investigated and charged where reasonable cause exists.

2. California Fair Housing Act

The State Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The Fair Employment and Housing Act (FEHA) (Government Code Section 12955 et seq.) prohibits discrimination and harassment in housing practices, including:

- Advertising

- Application and selection process
- Unlawful evictions
- Terms and conditions of tenancy
- Privileges of occupancy
- Mortgage loans and insurance
- Public and private land use practices (zoning)
- Unlawful restrictive covenants

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex
- Marital status
- Source of income
- Sexual orientation
- Gender identity/expression
- Genetic information
- Familial status (households with children under 18 years of age)
- Religion
- Mental/physical disability medical condition
- Age

3. Other Fair Housing Legislation

In addition, the FEHA contains similar reasonable accommodations and accessibility provisions as the Federal Fair Housing Amendments Act. In October 2019, Senate Bill 329 was signed into law. Landlords are barred from refusing someone's rental application based solely on their source of income. Law now enables families with housing assistance, including Section 8 Housing Vouchers, to successfully apply for and obtain, if they qualify, housing that they can afford in preferred neighborhoods.

The Unruh Civil Rights Act provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists "sex, race, color, religion, ancestry, national origin, disability, or medical condition" as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics.

Furthermore, the Ralph Civil Rights Act (California Civil Code Section 51.7) forbids acts of violence or threats of violence because of a person's race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute. Hate violence can be verbal or written threats; physical assault or attempted assault; and graffiti, vandalism, or property damage.

The Bane Civil Rights Act (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from

interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act are not allowed for speech alone unless that speech itself threatened violence.

Finally, California Civil Code Section 1940.3 prohibits landlords from questioning potential residents about their immigration or citizenship status. Landlords in most states are free to inquire about a potential tenant's immigration status and to reject applicants who are in the United States illegally. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person's citizenship or immigration status.

In addition to these acts, Government Code Sections 11135, 65008, and 65580-65589.8 prohibit discrimination in programs funded by the State and in any land use decisions. Specifically, changes to State law require local jurisdictions to address the provision of housing options for special needs groups, including:

- Housing for persons with disabilities
- Housing for homeless persons, including emergency shelters, transitional housing, and supportive housing
- Housing for extremely low-income households, including single-room occupancy units
- Housing for persons with developmental disabilities

4. Fall 2023 California State Legislative Session

The Fall 2023 California State legislative session enacted additional protections for renters:

- AB 12 caps security deposits at one month's rent, regardless of whether a unit is furnished or unfurnished
- SB 267 prohibits landlords from using a person's credit history as part of the application process – if they have a government rental subsidy, such as Section 8 — without offering the applicant the option to provide alternative evidence of a verifiable legal means to pay their portion of the rent
- AB 1620 allows local jurisdictions that have enacted rent control ordinances to permit a tenant to maintain the same rent if they make a request to the landlord to move to a comparable or smaller unit in the same building due to a permanent disability related to mobility

These new protections should assist in reducing historic barriers to low-income and assisted renters' ability to lease units.

CHAPTER 2 PUBLIC PARTICIPATION

The preparation of this AI involved public outreach, participation, and incorporation of comments relative to meeting the fair housing needs of Torrance. A community engagement program was released including:

- A Community Needs Survey (included in the Substantial Amendment to the Consolidated Plan Survey)
- 30-day public review
- Two public hearings

A. Community Needs Survey

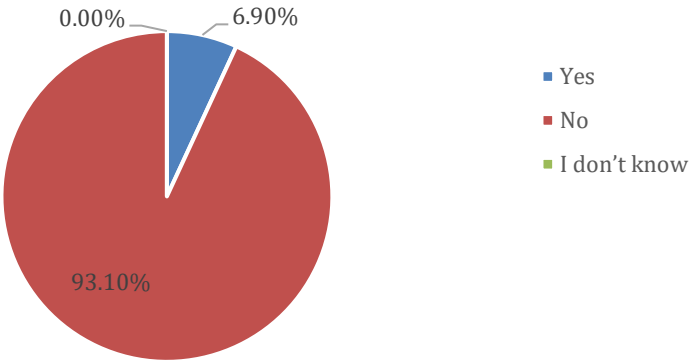
A Community Needs Survey was conducted as part of the Substantial Amendment to the Consolidated Plan and AI process. In December 2023, the City published an on-line survey and distributed the link to area-wide stakeholders. The survey was conducted to solicit the community's input on the City's most pressing needs, particularly in the areas of housing, parks, community facilities, human services, accessibility, affordable housing, and fair housing.

A total of 47 people completed the survey, including representatives from agencies servicing the Torrance area. The survey was advertised on the City's website, City's social media, and newsletter.

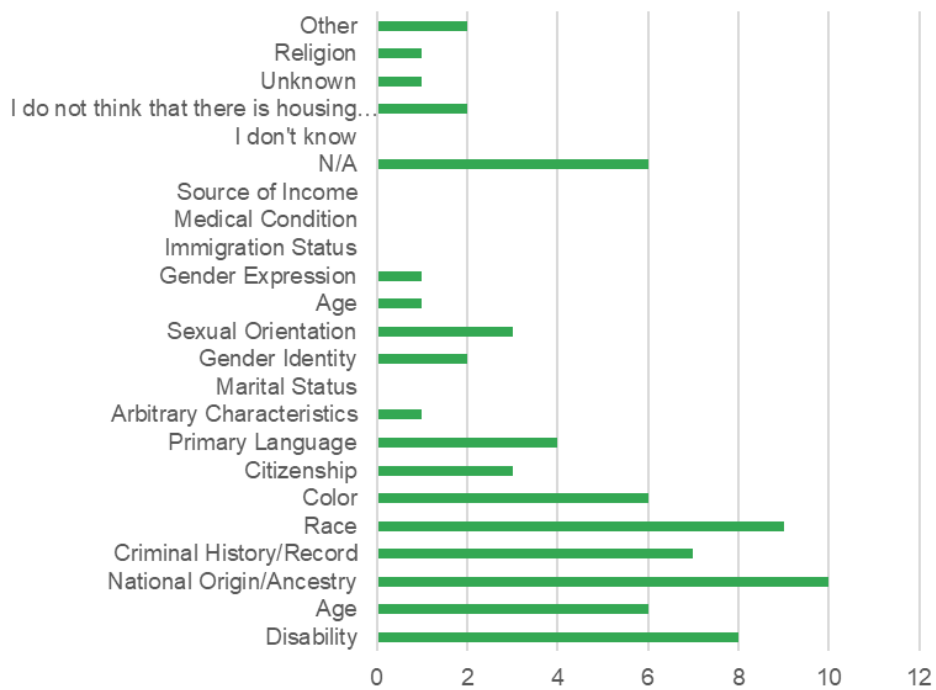
While 41.38% of respondents not affiliated with an organization believe that housing discrimination occurs in Torrance, only 6.90% (2 individuals) reported having experienced housing discrimination personally or through someone they know, suggesting either a low incidence of such cases or a lack of awareness and reporting.

The types of discrimination most frequently cited were National Origin/Ancestry (13.7%), Race (12.3%), and Disability (11.0%).

Have you or someone you know ever been the victim of housing discrimination in the City of Torrance?

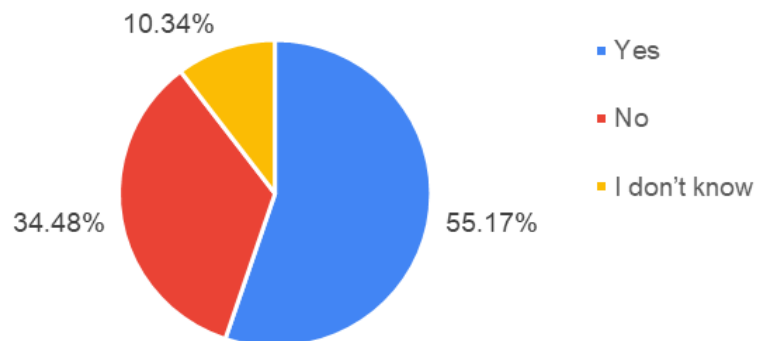


What types of housing discrimination do you think are most prevalent?



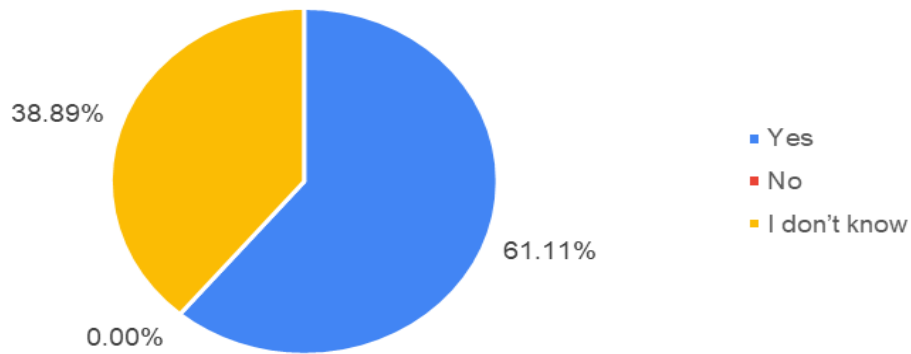
The respondent data indicates that there is a need for increased awareness and education around tenant rights, particularly concerning the processes for requesting reasonable accommodations. 34.48% of respondents were not aware of a tenant’s right to request accommodations due to disabilities, underscoring a knowledge gap that could hinder individuals with disabilities from securing accessible housing. This is a potential area for increased education for residents.

Are you aware of a tenant's right to request, from a landlord, a physical change to make a home more accessible due to a disability (called a "reasonable accommodation")?

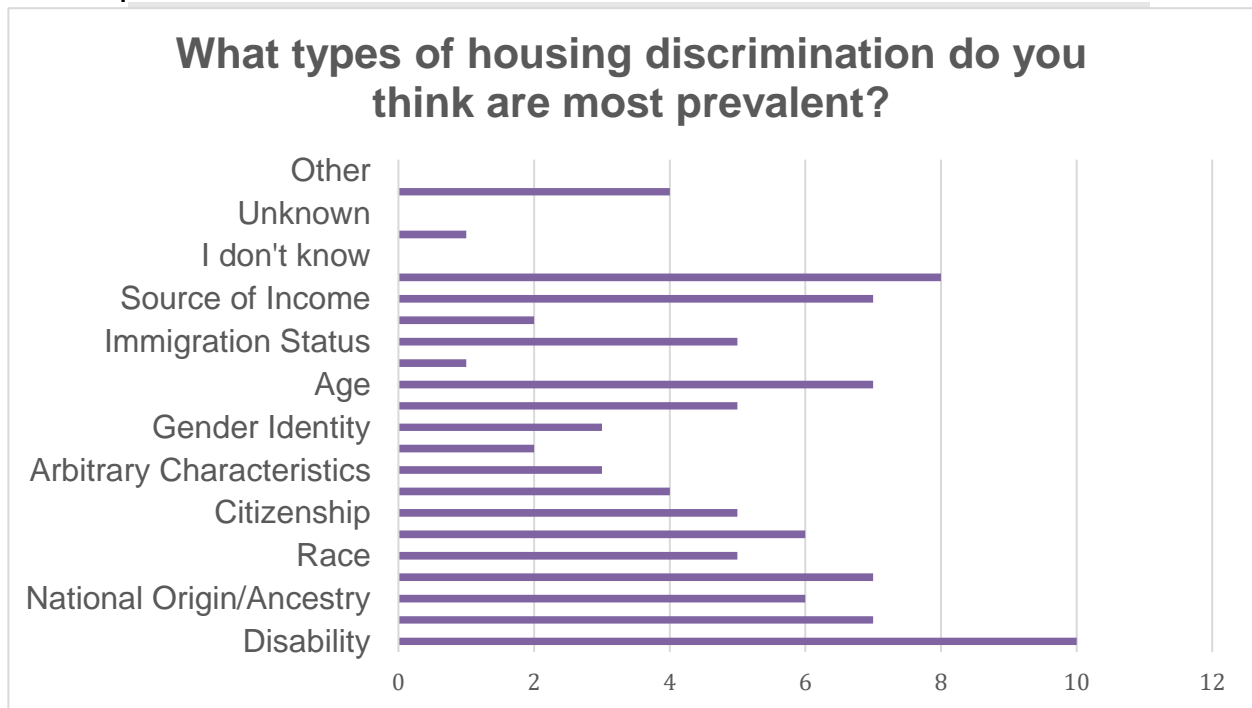


The survey results differ for **individuals affiliated with organizations**, such as non-profits or housing providers. Among this group, 61.11% believe housing discrimination happens in Torrance and 77.78% are aware of the reasonable accommodation process. Within this affiliated group, respondents believe that discrimination based on disability is the most prevalent (10.2%).

Do you believe housing discrimination happens in Torrance?



What types of housing discrimination do you think are most prevalent?



The survey results indicate a possible need for increased education in the community regarding the reasonable accommodation process.

B. Housing Rights Center Consultation

As a key element of public participation, the City obtained detailed information from the Housing Rights Center (HRC) on individuals who discussed fair housing complaints. The City was previously a participant in the Los Angeles Urban County, and as such was part of the Housing Rights Center contract to provide and administer a Fair Housing Counseling Program for the residents and landlords of Torrance. Starting in FY 2024-25, the City will allocate CDBG funds annually for a sub-recipient contract with the HRC to provide services in Torrance.

The housing discriminatory concerns voiced by residents seeking HRC services included: disability (physical and mental), race, age, familial status, and source of income. These concerns provide evidence that there continues to be a need for the investigation of housing discrimination complaints in Torrance.

C. Public Review Draft of AI

Notice of the availability of the draft AI was published in the Daily Breeze on October 18, 2024, which announced the 30-day public comment period beginning October 18, 2024 and concluding on November 18, 2024. Notices were also posted within the 3 public places at City Hall (City website, City Clerk Notice Board, and One-Stop Permit Center). A copy of the draft AI was placed on display at the City's City Clerk's Office, the City of Torrance's Community Development Department, and on the City's website.

D. Public Hearings

On October 24, 2023, a public hearing was conducted to solicit input on the development of the Substantial Amendment to the Consolidated Plan and Action Plan. This public hearing included the request for feedback on affirmatively furthering fair housing. This hearing took place before the Torrance City Council. Notice of this public hearing was published in the Daily Breeze on October 13, 2023. Notices were also posted within the 3 public places at City Hall (City website, One-Stop Permit Center Bulletin Board, and the City Clerk Notice Board) on this same day. No written or verbal public comments were received related to factors and impediments that contribute to fair housing. Minutes of this meeting are on file with the City Clerk's Office.

The City will hold a public hearing providing citizens with an opportunity to comment on the draft AI and the City Council's adoption of it. This hearing will take place in front of the Torrance City Council on November 19, 2024. Notice of this public hearing will be published in the Daily Breeze on November 8, 2024. Notices for this hearing will be posted within the 3 public places at City Hall (City website, City Clerk Public Notice Board, and the One-Stop Permit Center Bulletin Board) on this same day November 8, 2024. All comments received will be included in the final AI. Minutes of this meeting are on file with the City Clerk's Office.

CHAPTER 3 COMMUNITY PROFILE

This chapter analyzes the demographic profile, income distribution, employment, housing stock characteristics, and lending practices in Torrance. By assessing this information, the development of housing patterns within the City in relation to race, ethnicity, income, and other characteristics can be determined. This chapter discusses the various characteristics that may affect the availability of households with similar income in the same housing market to have a like range of housing choice. Each year, HUD receives custom tabulations of American Community Survey (ACS) data from the US Census Bureau. These datasets (as well as the State of California, Department of Finance estimates) were used as a primary source of information for this chapter.

A. Demographic Profile

Examination of demographic characteristics provides insight into the extent of equal access to housing in a community. Factors such as population growth and changes in age characteristics and racial/ethnic composition help determine a community’s housing needs and assist in identifying potential impediments to Fair Housing Choice.

Regional Settings

The City of Torrance (City) is one of the South Bay Cities in the County of Los Angeles. Torrance is a coastal community in southwestern Los Angeles County. Torrance has 1.5 miles of beachfront on the Pacific Ocean. Torrance was incorporated in 1921, and as of the 2020 census has a population of 147,067 residents. It is a dense and diversely multicultural City, and historically remains a bedroom community.

B. Population Growth In Los Angeles County and Torrance

1. Population Growth in Los Angeles County

As shown in Table 1, between 2020 and 2040, the State of California estimates that the Los Angeles County population will decrease by approximately 706,784. The projections show net decreases in all population groups and overall at 7.06%. The County of Los Angeles’ largest population groups are: Hispanic (all races), White (Non-Hispanic), and Asian (Non-Hispanic).

Attachment A contains the race definitions. Ethnicity refers to being Hispanic or Latino or not being Hispanic or Latino. Attachment B defines this population group.

**Table 1
Los Angeles County Population Change by Race/Ethnicity: 2020 and 2060**

Race/Ethnicity	2020	2040	Numerical Change
White (non-Hispanic)	2,550,540	2,370,504	-180,036
Black or African American (Non-	795,612	739,456	-56,156

Hispanic)			
American Indian/Alaska Native (Non-Hispanic)	18,784	17,458	-1,326
Asian (non-Hispanic)	1,505,832	1,399,541	-106,291
Native Hawaiian or Other Pacific Islander (non-Hispanic)	22,043	20,497	-1,546
Multi-Race (non-Hispanic)	227,442	211,396	-16,046
Hispanic (any race)	4,893,290	4,547,907	-345,383
Total	10,013,543	9,306,759	-706,784

Source: California Department of Finance, Demographic Research Unit, Report P-2 County Population Projections by Race/Ethnicity 2020-2060 (by decade)

2. Population Growth in Torrance

Overall, between 2020 and 2024, the population of Torrance decreased from approximately 146,820 to 142,910 persons, representing a decrease of 2.6 percent. Since 2020, every year has seen a small population decrease (see Table 2).

Table 2
Population Trends: 2020-2024

Year	Population	Percent Change
2020	146,820	N/A
2021	145,989	-0.57%
2022	144,406	-1.08%
2023	143,433	-0.67%
2024	142,910	-0.36%

Source: State of California, Department of Finance, E-4: Population and Housing Estimates for Cities, Counties, and the State, 2020-2024, with 2020 Census Benchmark. Sacramento, California, May 2024

C. Torrance Housing, Demographic, and Economic Characteristics

1. Existing Housing Stock

Table 3 shows that 59,176 housing units comprise Torrance’s housing stock. Single-family detached homes comprise approximately 53% of the housing stock. Multi-family units in structures with five or more units account for 32% of the housing stock.

Table 3
Housing Stock by Type of Unit

Property Type	Number	%
1-unit detached structure	31,854	53%
1-unit, attached structure	3,864	6%
2-4 units	3,902	7%

Property Type	Number	%
5 or more units	18,972	32%
Mobile Home	1,124	2%
Total	59,716	100%

Source: American Community Survey (ACS) 2022: ACS 5-Year Estimates Data Profiles, Table DP04 Selected Housing Characteristics

2. Homeownership

Homeownership is a key indicator of community well-being. Increases or decreases in the percentage of owner-occupied housing, especially in communities that are not high growth, indicates a change in the balance between renter-occupied and owner-occupied housing.

According to the 2022 ACS 5-Year Estimates, the homeownership rate in Torrance is 54.8%, which is higher than Los Angeles County rate of 46.2%. This homeownership rate is consistent with the large percentage of single-family dwellings within the City of Torrance.

3. Household Income

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

Household income is the key determinant of ability to pay for housing. For many households, their income is too limited to afford existing housing. A larger number of households have incomes too low to afford new housing, as new housing is usually more expensive than existing housing.

Table 4 shows there are approximately 55,719 households residing in Torrance. This table breaks down the number and percentage of households in 10 income groups. Over 54% of all households had yearly incomes over \$100,000. While another 24% of all households had yearly incomes between \$50,000 and \$99,999. HUD publishes income limit data yearly for its assisted housing programs, Torrance is included in the Los Angeles-Long Beach-Glendale, CA HUD Metro Fair Market Rent (FMR) Area for income limits. The income limits published in April 2022 show that the median family income in this area was \$91,100. The data in Table 4 shows that the majority of Torrance households have incomes higher than the median of the FMR area.

The balance of Torrance households had annual income of less than \$50,000. The households with annual incomes of less than \$50,000 have the most difficulty qualifying for a home loan.

Table 4
Household Income Distribution: 2022

Household Income	Number of Households	Percent
Less than \$10,000	2,084	3.74%
\$10,000 to \$14,999	956	1.72%
\$15,000 to \$24,999	2,119	3.80%
\$25,000 to \$34,999	2,459	4.41%
\$35,000 to \$49,999	4,319	7.75%
\$50,000 to \$74,999	6,955	12.48%
\$75,000 to \$99,999	6,432	11.54%
\$100,000 to \$149,999	11,204	20.11%
\$150,000 to \$199,999	7,242	13.00%
\$200,000 or more	11,949	21.45%
Total	55,719	100.0%

Source: American Community Survey (ACS) 2022: ACS 5-Year Estimates Data Profiles, Table DP04 Selected Housing Characteristics

4. Labor-Force/Employment Characteristics

Another key to people’s ability to exercise housing choice is employment; both jobs within the City as well as the number of local residents that are employed. Employment generates income, which leads to effective housing demand and housing choice.

Torrance offers diverse employment opportunities in a variety of industries. According to the 2021 U.S. Census data on employment statistics (Table 5), the largest industry in Torrance is Health Care and Social Assistance (22.7%), followed by Manufacturing (13%) and Retail Trade (12.3%). Industries such as professional services and technical services indicate areas likely to see growth as businesses adapt to technological changes. Professional, Scientific, and Technical Services (7.4%) have similar employment ranges to Administration (8.1%) and Food Services (7.6%).

Table 5
Total Torrance Employment by Sector: 2021

Jobs by NAICS Industry Sector (2021)	Count	Share
Agriculture, Forestry, Fishing and Hunting	433	0.5%
Mining, Quarrying, and Oil and Gas Extraction	315	0.3%
Utilities	378	0.4%

Construction	2,459	2.6%
Manufacturing	12,151	13.0%
Wholesale Trade	6,565	7.0%
Retail Trade	11,556	12.3%
Transportation and Warehousing	3,410	3.6%
Information	851	0.9%
Finance and Insurance	2,842	3.0%
Real Estate and Rental and Leasing	1,817	1.9%
Professional, Scientific, and Technical Services	6,959	7.4%
Management of Companies and Enterprises	819	0.9%
Administration & Support, Waste Management and Remediation	7,547	8.1%
Educational Services	3,326	3.6%
Health Care and Social Assistance	21,233	22.7%
Arts, Entertainment, and Recreation	465	0.5%
Accommodation and Food Services	7,154	7.6%
Other Services (excluding Public Administration)	2,137	2.3%
Public Administration	1,248	1.3%
Total	93,665	100.0%

Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment

Data from the Census' Longitudinal Employer-Household Dynamics indicates that only a small portion (12.4%) of the workforce resides in Torrance jurisdiction, while a significant majority (87.6%) live outside of Torrance. The majority of residents who work outside the City are between the ages of 30 and 54, and most earn above \$3,333 per month. The data indicates a reliance on external workers, as only 18.5% of Torrance residents find employment locally. The net job inflow suggests a strong demand for workers commuting to Torrance, as well as the large amount of job opportunities present in the City. The number of commuters highlights the potential need for increased housing opportunities for people working in the City of Torrance, such as workforce housing.

Health Care and Social Assistance positions was the top sector for both residents (14.6%) and Torrance Jobs (22.7%) which could indicate that a majority of HealthCare and Social Assistance employees live and work in Torrance.

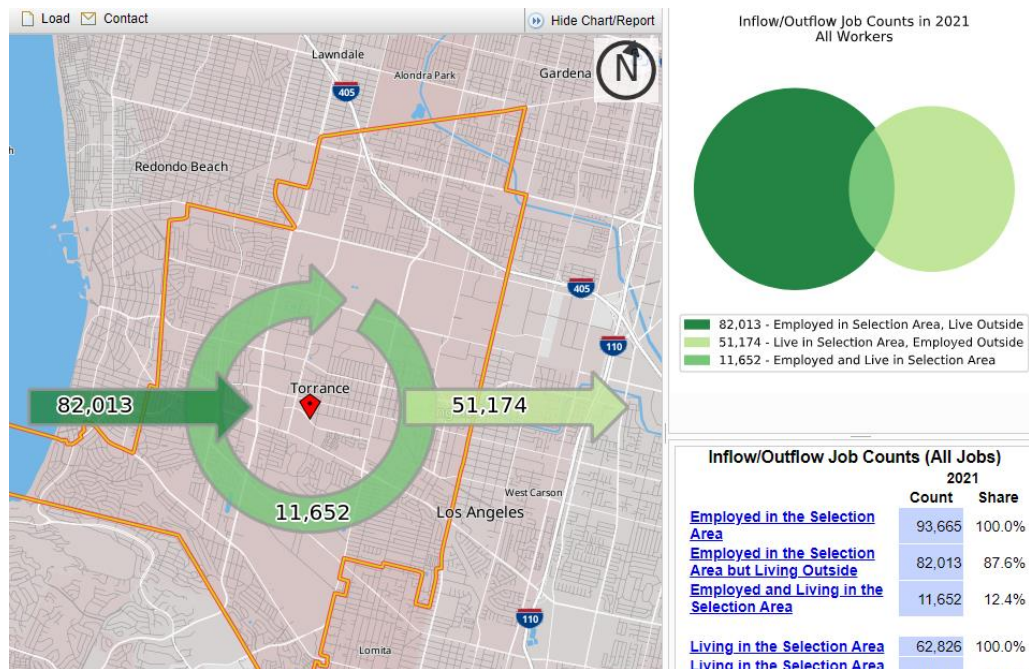
According to Table 6, approximately 10% of Torrance residents are employed in professional service, scientific, or technical jobs outside of Torrance. These positions tend to be higher paying and could explain why residents may seek these opportunities outside of the City

Table 6
Resident's Jobs by Sector: 2021

Jobs by NAICS Industry Sector (2021)	Count	Share
Agriculture, Forestry, Fishing and Hunting	321	0.5%
Mining, Quarrying, and Oil and Gas Extraction	47	0.1%
Utilities	365	0.6%

Construction	1,936	3.1%
Manufacturing	6,526	10.4%
Wholesale Trade	3,514	5.6%
Retail Trade	5,421	8.6%
Transportation and Warehousing	4,005	6.4%
Information	3,046	4.8%
Finance and Insurance	2,286	3.6%
Real Estate and Rental and Leasing	1,191	1.9%
Professional, Scientific, and Technical Services	5,878	9.4%
Management of Companies and Enterprises	1,100	1.8%
Administration & Support, Waste Management and Remediation	3,646	5.8%
Educational Services	5,253	8.4%
Health Care and Social Assistance	9,196	14.6%
Arts, Entertainment, and Recreation	847	1.3%
Accommodation and Food Services	4,428	7.0%
Other Services (excluding Public Administration)	1,696	2.7%
Public Administration	2,124	3.4%
Total	62,826	100.0%

Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2021). The data reveals a large number of employment opportunities within the City as well as a large portion of the workforce able to access employment outside the City.



Source: U.S. Census Bureau, OnTheMap Application and LEHD Origin-Destination Employment Statistics (Beginning of Quarter Employment, 2nd Quarter of 2002-2021).

D. Profile of Torrance's Fair Housing Protected Classes

1. Introduction

The Federal Fair Housing Act prohibits discriminatory practices that make housing unavailable because of a person's:

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

In addition, California law prohibits discriminatory housing practices because of the following:

- Marital Status
- Ancestry
- Source of Income
- Age
- Arbitrary Characteristic

Definitions of the fair housing protected groups are found in Attachment C.

2. Race/Color

a. Race and Ethnic Categories

The Fair Housing Act does not define race. The racial categories included in the census form generally reflect a social definition of race recognized in this country, and are not an attempt to define race biologically, anthropologically or genetically. In addition, the U.S. Census Bureau recognizes that the race categories include both racial and national origin and socio-cultural groups. Census 2020 and the American Community Survey provide for six race categories:

- White
- Black or African American
- American Indian or Alaska Native
- Asian
- Native Hawaiian or Other Pacific Islander
- Some Other Race
-

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

The 2010 and 2020 Census race and ethnic categories follow the Office of Management and Budget (OMB) Policy Directive No. 15 (May 12, 1977) and the 1997 revisions. The OMB's efforts are to standardize the racial and ethnic categories so that federal government agencies can monitor discrimination, as required by the Civil Rights Act of 1964, the Voting Rights Act of 1965, the Fair Housing Act of 1968, the Equal Credit Opportunity Act of 1974, and the Home Mortgage Disclosure Act of 1975 (Source: Victoria Hattam, "Ethnicity & the American Boundaries of Race: Rereading Directive 15," *Daedalus – Journal of the American Academy of the Arts & Sciences*, Winter 2005, pgs. 61-62). Ethnicity means being of Hispanic or Latino Origin or not being of such origin.

b. Definitions of Minority Populations

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

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

The CEQ environmental justice guidelines provide the following definition:

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

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

c. Torrance's Population by Race and Ethnicity

Table 7 shows the population growth by race and ethnicity between 2010 and 2020. The census population counts are based on self-identification. The total population increased by 1,629 from 2010 to 2020. The population composition also changed; as the Hispanic/Latino population, Black/African American Population, Asian, and Multiracial populations all had significant increases.

Table 8 compares Torrance's population composition to that of the balance of Los Angeles County (excluding the City). Torrance has a lower percentage of the Hispanic/Latino population and higher percentage of the Asian and

Multiracial/Other Race categories than the balance of Los Angeles County (excluding the City of Torrance).

Table 7
Population Growth by Race and Ethnicity 2000 Census and 2010 Census

Race/Ethnicity	2010	2020	Increase/Decrease
Hispanic or Latino	23,440	28,080	4,640
Not Hispanic or Latino	121,998	118,987	-3,011
White Alone	61,591	51,913	-9,678
Black or African American Alone	3,740	4,781	1,041
American Indian and Alaska Native Alone	304	235	-69
Asian Alone	49,707	51,857	2,150
Native Hawaiian and Other Pacific Islander Alone	473	523	50
Some Other Race Alone	505	980	475
Two or More Races	5,678	8,698	3,020
Total	145,438	147,067	1,629

Source: Census 2010 Summary File 1, Table P009 Hispanic or Latino, and Not Hispanic or Latino by Race; Census 2020 Summary File 1, Table P9 Hispanic or Latino, and Not Hispanic or Latino by Race

Table 8
City of Torrance and
Remainder of Los Angeles County Population by Race and Ethnicity: 2020

Category	Torrance		Los Angeles County	
	# of Persons	% of Total	# of Persons	% of Total
Not Hispanic or Latino				
White	51,913	35.30%	2,511,696	25.46%
Black or African American	4,781	3.25%	755,908	7.66%
American Indian/Alaska Native	235	0.16%	18,218	0.18%
Asian	51,857	35.26%	1,422,380	14.42%
Native Hawaiian/Pacific Islander	523	0.36%	19,999	0.20%
Other Races or 2+ Races	9678	6.58%	362,058	3.67%
Hispanic or Latino (any race)	28,080	19.09%	4,776,683	48.41%
Total	147,067	100.00%	9,866,942	100.00%

Source: Census 2020 Summary File 1, Table P9 Hispanic or Latino, and Not Hispanic or Latino by Race.

d. Population Diversity

The Public Policy Institute of California completed research on the population diversity of California’s cities and neighborhoods based on 2010 Census information and later updated to reflect new data from the 2020 Census. According to the updated diversity study, there has been a continuation of significant demographic shifts in California, reflecting broader national trends. From 2010 to 2020, California saw a notable decline in its white population, dropping by 5.5%, while the Latino population surged by 2.6%. The Asian and Pacific Islander demographic also grew by 2.6%, along with an increase in multiracial residents by 0.5%.

Despite these shifts at the state level, the situation in Torrance presents a more complex picture. According to data from the U.S. 2020 Census American Community Survey (See Table 9), only 19.3% of the Torrance population identifies as Hispanic or Latino, marking them as a minority. As noted previously, HUD categorizes Hispanic/Latino or not Hispanic/Latino as ethnicity as opposed to race. Of those that identify as Hispanic/Latino:

- 37.12% said they belonged to Some Other Race Alone
- 30.42% identified themselves as having Two or More Races
- 28.51% of the Hispanic population said that their race was White Alone

Thus, majority of Hispanic or Latino people identify with Some Other Race Alone followed by people who identify with Two or More Races.

- In contrast, the majority of Torrance's population (80.7%) is classified as Non-Hispanic or Latino. Of those that identify as not Hispanic/Latino:46.33% of the non-Hispanic population said that they belonged to Asian Alone
- 41.39% said that their race was White Alone
- 7.02% identified themselves as having Two or More Races

Thus, a majority of Non-Hispanic or Latino people identify with Some Other Race Alone followed by people who identify with Two or More Races. Torrance continues to be an area with racial and ethnic diversity.

Table 9
Race of Hispanic or Latino and Non-Hispanic or Latino Populations: 2022

Race	Hispanic or Latino	Percent Distribution	Non-Hispanic or Latino	Percent Distribution	Total	Percent Distribution
White Alone	8,000	28.51%	48,586	41.39%	56,586	38.90%
Black or African American Alone	196	0.70%	4,683	3.99%	4,879	3.35%
American Indian or	250	0.89%	591	0.50%	841	0.58%

Alaska Native Alone						
Asian Alone	664	2.37%	54384	46.33%	55048	37.85%
Hawaiian or Other Pacific Islander Alone	0	0.00%	228	0.19%	228	0.16%
Some Other Race Alone	10,416	37.12%	679	0.58%	11,095	7.63%
Two or More Races	8,536	30.42%	8241	7.02%	16,777	11.53%
Total	28,062	100.00%	117,392	100.00%	145,454	100.00%

Source: U.S. Census Bureau. (2022). ACS Demographic and Housing Estimates. American Community Survey, ACS 5-Year Estimates Data Profiles, Table DP0

3. Sex (of Householder)

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

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

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

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

Table 10 presents data on the number of male and female householders. The counts *exclude* married couple families as homes are typically owned or rented in both spouses’ names. Excluding married couples, there are approximately 27,551 householders of whom 57.2% (15,750) are female and 42.8% (11,801) are male.

Poor women, as noted above by the DOJ, are often the victims of sexual harassment in relation to housing search. Gender is the basis for 0% of the housing discrimination inquiries filed with the Housing Rights Center.

Table 10
Sex of Householder

Sex of Householder	Total	Percentage
Male Householder, No Spouse Present	2,877	24.38%
Male Householder Living Alone	7,252	61.45%
Male Householder Living with Others	1,672	14.17%
Subtotal	11,801	100.00%
Female Householder, No Spouse Present	5,354	33.99%
Female Householder Living Alone	7,791	49.47%
Female Householder Living with Others	2,605	16.54%
Subtotal	15,750	100.00%
Total	27,551	100.00%

Source: American Community Survey (ACS), 2022: ACS 1-Year Estimates Data Profiles, Table S1101, Households and Families; and 2022: ACS 1-Year Estimates Data Profiles, Table C11010, Nonfamily Household by Sex of Householder by Living Alone by Age of Householder

4. National Origin/Ancestry

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

As of 2022, Asia was the place of birth for 72.2% of the Torrance foreign-born population (Table 11). Table 12 shows that the race and ethnicity of the foreign-born population reflects the place of birth or country of origin: 15.3% Hispanic or Latino and 13.5% were White, not Hispanic or Latino. National origin is the basis for approximately 0% of all housing discrimination complaints filed with the Housing Rights Center.

Table 11
Place of Birth of the Foreign-Born Population: 2022

Place of Birth	Percent
Europe	6.4%
Asia	72.2%
Africa	2.4%
Oceania	0.3%
Latin America	17.7%
North America	1.1%
Total	100.00%

Source: American Community Survey (ACS), 2022: ACS 5-Year Estimates Data Profiles, Table S0502: Selected Characteristics of the Foreign-Born Population by Period of Entry into the United States

Table 12

Race of the Foreign-Born Population: 2022

Race	Number	Percent
<i>One Race</i>		
White	16,503	16.2%
Black or African American	81	1.1%
American Indian and Alaska Native	107	0.2%
Asian	402	68.3%
Native Hawaiian and Other Pacific Islander	161	0.0%
Some Other Race	9,392	8.6%
<i>Two or More Races</i>		
Total	26,834	100.0%
Hispanic or Latino of Any Race	26,056	15.3%
White Alone, Not Hispanic or Latino	134	13.5%

Source: American Community Survey (ACS), 2022: ACS 5-Year Estimates Data Profiles, Table S0502: Selected Characteristics of the Foreign-Born Population by Period of Entry into the United States.

5. Language Barrier

The population of other national origins requires consideration not only on their presence, but also on the possible language barriers that may exist. ACS data shows that 41.2% of Torrance residents 5 years and over speak a language other than English. Of this 41.2%, Spanish accounts for 10.3%, Other Indo-European languages at 6%, and Asian and Pacific Island languages at 23%.

Additionally, according to ACS data, 17.7% of the Population 5 years and over speak English less than “very well.” As a result, a language barrier is presumed to exist that could prevent many residents of the City from taking full advantage of their housing rights.

6. Familial Status

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

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

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

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

Table 13 shows there are an estimated 36,945 *family* households. A family consists of a householder and one or more other people living in the same household who are related to the householder by birth, marriage, or adoption. All people in a household who are related to the householder are regarded as members of his or her family.

Nearly 15,655 family households have children; therefore, about 42.37% of all households have children less than 18 years of age. Families with children represent a significant number of all households. Most families with children are two parent families. But 2,074 female householders have children less than 18 years of age. Familial status is the basis for 5.9% of all housing discrimination inquiries filed with the Housing Rights Center.

Table 13
Families With and Without Children: 2022

Type of Family	With Children >18 Years	Percent	Without Children <18 Years	Percent	Total	Percent
Spouse Families	12,841	44.08%	16,291	55.92%	29,132	78.85%
Female Householder No Husband Present	2,074	36.33%	3,635	63.67%	5,709	15.45%
Male Householder No Wife Present	740	35.17%	1,364	64.83%	2,104	5.69%
Total	15,655	42.37%	21,290	57.63%	36,945	100.00%

Source: American Community Survey (ACS), 2022: ACS 5-Year Estimates Data Profiles, Table B11003: Family Type by Presence and Age of Own Children Under 18 Years.

7. Handicap/Disability

a. Background

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

housing laws, therefore, make it illegal to deny a housing opportunity on the basis of disabilities.

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

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

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

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

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

In Torrance, disability is the basis for approximately 64.7% of all housing discrimination inquiries filed with the Fair Housing Foundation. This indicates a need for increased landlord and tenant education regarding housing rights related to disability status (physical and mental).

b. Estimates of People with Disabilities and Types of Disabilities

According to Table 14, 14,083 Torrance residents have one or more disabilities. The table shows the number of disabled persons by age group. The elderly population the highest disability prevalence rate – that is, about 45.86% of all persons 75 years of age and older have one or more disability.

Table 14
Disability Status of Civilian Non-institutionalized Population by Age Group: 2022

Age Group	Total Population	Disabled Population	Percent Disabled
< 5 years	7,480	18	0.24%
5-17 years	22,729	1115	4.91%
18-34 years	26,524	1121	4.23%
35 -64 years	62,794	4,541	7.23%
65-74 years	13,493	2066	15.31%
75 years +	11,386	5,222	45.86%
Total	144,406	14,083	9.75%

Source: American Community Survey (ACS), 2022: ACS 5-Year Estimates Data Profiles, Table B18101: Sex by Age by Disability Status.

8. Marital Status

The California Fair Employment and Housing Act prohibits discrimination based on marital status. The applicable state regulation defines marital status as –

An individual’s state of marriage, non-marriage, divorce or dissolution, separation, widowhood, annulment, or other marital status.

Essentially, this means that all persons in a household or establishing a household fall within the meaning of this fair housing protected group. People are covered regardless of marital status or the state of marriage or non-marriage.

The 2022 *American Community Survey* has five “marital status” categories:

- Never married
- Now married
- Separated
- Widowed
- Divorced

These terms refer to the marital status at the time of the survey. A married couple includes a family in which the householder and his or her spouse are enumerated as members of the same household. Table 15 shows that 52.32% of the population 15 years of age or older are married and 31.09% have never married. The “now married” category includes all married people except those who are legally married but separated.

Table 15
Marital Status of the Population 15 Years and Over: 2018

Marital Status	Females	Percent	Males	Percent	Total	Percent
Never Married	17,020	45.60%	20,303	54.40%	37,323	31.09%

Now Married	30,916	49.23%	31,887	50.77%	62,803	52.32%
Separated	728	46.55%	836	53.45%	1,564	1.30%
Widowed	5,820	82.64%	1,223	17.36%	7,043	5.87%
Divorced	6,995	61.91%	4,304	38.09%	11,299	9.41%
Total	61,479	51.22%	58,553	48.78%	120,032	100.00%

Source: American Community Survey (ACS), 2022: ACS 5-Year Estimates Data Profiles, Table DP02: Selected Social Characteristics in the United States.

E. Comparison of the Status and Well-Being of Fair Housing Protected Groups

Part E compares the relative well-being of the fair housing protected groups in terms of poverty status and homeownership.

1. Poverty Income by Race and Ethnicity

The ACS data estimates that 6.65% of the Population for whom poverty status is determined is below the poverty level. The following race/ethnicity categories have a higher percentage than the population at large: Black or African American (11.38%), Some Other Race (8.48%), Two or More Races (8.19%), and Hispanic or Latino of Any Race (7.43%).

Table 16
Poverty Status by Race: 2022

Race	Number	Below Poverty Level	Percent
One Race			
White	56,083	3,228	5.76%
Black or African American	4,710	536	11.38%
American Indian and Alaska Native	841	9	1.07%
Asian	54,926	3,537	6.44%
Native Hawaiian and Other Pacific Islander	228	6	2.63%
Some Other Race	10,919	926	8.48%
Two or More Races	16,573	1,358	8.19%
Total	144,280	9,600	6.65%
Hispanic or Latino of Any Race	27,632	2,054	7.43%
White Alone, Not Hispanic or Latino	48,173	2,897	6.01%

Source: American Community Survey (ACS), 2022: ACS 5-Year Estimates Data Profiles, Table S1702: Poverty Status in the last 12 Months

2. Poverty Income by Familial Status and Presence of Children

Poverty by family type offers another indicator of the well-being of the fair housing protected groups. Female householders with children often confront bias in the rental housing market. Their access to decent housing also is made more difficult by poverty. Table 17 shows that female households have significantly higher poverty rates than other household types.

Table 17
Poverty Status by Familial Status and Presence of Children: 2022

Family Type	Total Number of Families	Number Below Poverty Level	Percent Below Poverty Level
Married Couple Families	29,132	816	2.8%
With related children under 18 years	13,160	460.6	3.50%
Female Householder, no husband present	5,709	765	13.40%
With related children under 18 years	2,419	568	23.50%
All Families	36,945	1,699	4.60%
With related children under 18 years	16,437	1,085	6.60%

Source: American Community Survey (ACS), 2022: ACS 5-Year Estimates Data Profiles, Table S1702: Poverty Status in the Past 12 Months of Families.

3. Tenure by Race and Ethnicity

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

There is a high correlation between the number and percentage of renter households and the need for fair housing services. Table 18 shows the home ownership rates of occupied housing units by race and ethnicity. According to the table, the City has 30,541 owner occupied units (54.81%) and 25,178 renter (45.19%) households. Homeownership rates among racial categories ranged from a low of 14.84% (Native Hawaiian/Pacific Islander) to a high of 61.40% (White). Additionally, Black/African American households have a proportionally lower homeownership rate at 17.03%.

Table 18
Homeownership Rates by Race and Ethnicity: 2022

Race/Ethnicity	Owners	Percent	Renters	Percent	Total Occupied Units	Percent
White	15,473	60.40%	10,146	39.60%	25,619	45.98%
Black or African American	313	17.03%	1,525	82.97%	1,838	3.30%
American Indian/Alaska Native	126	45.82%	149	54.18%	275	0.49%
Asian	11,247	57.36%	8,360	42.64%	19,607	35.19%

Native Hawaiian or Other Pacific Islander	19	14.84%	109	85.16%	128	0.23%
Some Other Race	1,260	33.11%	2,545	66.89%	3,805	6.83%
Two or More Races	2,103	47.29%	2,344	52.71%	4,447	7.98%
Total	30,541	54.81%	25,178	45.19%	55,719	100.00%
Hispanic or Latino	3,556	42.52%	4,808	57.48%	8,364	15.01%
White Alone, Not Hispanic or Latino	14,216	61.40%	8,936	38.60%	23,152	41.55%

Source: American Community Survey (ACS), 2022: ACS 5-Year Estimates Data Profiles Table S2502 Demographic Characteristics for Occupied Housing Units, Tenure by Race/Ethnicity.

4 Homeownership by Familial Status

Table 19 shows the homeownership rates of families with and without children. The need for fair housing services is directly correlated to size of the fair housing protected groups against whom housing discrimination is practiced. Families with children – most frequently renters – historically face housing discrimination. Table 19 shows that families with children have a lower home ownership rate. The data shows that a similar number of households with children are renters versus owners. However, proportionally, only 34% of the City’s homeowners are families with children.

Table 19
Tenure by Presence of Children: 2022

Presence of Children	Owner	Percent	Renter	Percent
With Own Children Under 18 Years	7,808	34.03%	7,847	56.04%
No Own Children Under 18 Years	15,134	65.97%	6,156	43.96%
Total	22,942	100.00%	14,003	100.00%

Source: American Community Survey (ACS), 2022: ACS 5-Year Estimates Data Profiles Table B25115: Tenure by Household Type and Presences and Age of Own Children.

5. Homeownership by Household Type and Sex of Householder

Table 20 provides information on homeownership by household type. Husband-wife families enjoy the highest homeownership rate (almost 72.6%). All other household types have low home ownership rates. Male householders living alone or with others have the lowest homeownership rates.

Table 20
Tenure by Household Type: 2022

Household Type	Owner	Percent	Renter	Percent	Total	Percent
Husband-Wife Families	6,096	72.6%	7,484	59.6%	13,580	55.7%
Male Householder, No Wife Present	545	6.4%	1,199	9.6%	1,744	10.5%

Female Householder, No Husband Present	1,218	14.5%	2,419	19.3%	3,637	21.9%
Nonfamily Households	545	6.5%	1,446	11.5%	1,991	5.1%
Total	8,404	40.1%	12,548	59.9%	20,952	100.0%

Source: American Community Survey (ACS), 2022: ACS 5-Year Estimates Data Profiles Table B25115: Tenure by Household Type and Presences and Age of Own Children.

CHAPTER 4 LENDING PRACTICES

Lending practices are a contributing factor to fair housing choice. An important element of fair housing choice is equity in money lending from financial service organizations. Such organizations include credit unions, banks, credit card companies, and insurance companies. Lending is often required for the access to credit financing for mortgages, home equity, and home repair loans. Access to information regarding financial services is also a concern involving equality.

Gaps in financial services can make residents vulnerable to these types of predatory lending practices, and lack of access to quality banking and financial services may jeopardize an individual's credit and the overall sustainability of homeownership and wealth accumulation.

This chapter reviews lending practices of financial institutions and financing allowed to all households but with an emphasis on lending to minority and low-income households. However, a jurisdiction's control over lending is limited due to federal laws and regulations.

A. Laws Governing Lending

1. Community Reinvestment Act (CRA)

The Community Reinvestment Act (CRA), enacted in 1977, requires the Federal Reserve and other federal banking regulators to encourage financial institutions to help meet the credit needs of the communities in which they do business, including low- and moderate-income (LMI) neighborhoods.

2. Banking Regulators for the CRA

Three federal banking agencies, or regulators, are responsible for the CRA. Banks that have CRA obligations are supervised by one of these three regulators. Each regulator has a dedicated CRA site that provides information about the banks they oversee and those banks' CRA ratings and Performance Evaluations.

- Federal Deposit Insurance Corporation (FDIC)
- Federal Reserve Board (FRB)
- Office of the Comptroller of the Currency (OCC)

3. Federal Reserve's Role

The Federal Reserve supervises state member banks or state-chartered banks that have applied for and been accepted to be part of the Federal Reserve System, for CRA compliance. To carry out its role, the Federal Reserve must:

Examine state member banks to evaluate and rate their performance under the CRA;

- Consider banks' CRA performance in context with other supervisory information when analyzing applications for mergers, acquisitions, and branch openings; and
- Share information about community development techniques with bankers and the public.

B. Home Mortgage Disclosure Act (HMDA)

The Home Mortgage Disclosure Act (HMDA) requires many financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. These data help show whether lenders are serving the housing needs of their communities; they give public officials information that helps them make decisions and policies; and they shed light on lending patterns that could be discriminatory. The public data are modified to protect applicant and borrower privacy. HMDA was originally enacted by Congress in 1975 and is implemented by Regulation C.

C. Government Backed Loans

Larger numbers of approved loans are government backed. There are different types of government backed loans. They include loans from the Federal Housing Administration (FHA), VA Home Loans, and the Rural Housing Services/Farm Service Agency (RHA/FSA).

1. Federal Housing Administration

Loans from the Federal Housing Administration (FHA) loans have been helping people become homeowners since 1934. The Federal Housing Administration (FHA), which is part of HUD, insures the loan, so your lender can offer you a better deal. They have low down payment requirement, low closing costs, and easy credit qualifying.

2. VA Home Loans

VA helps Service members, Veterans, and eligible surviving spouses become homeowners. As part of our mission to serve you, we provide a home loan guaranty benefit and other housing-related programs to help you buy, build, repair, retain, or adapt a home for your own personal occupancy. VA Home Loans are provided by private lenders, such as banks and mortgage companies. VA guarantees a portion of the loan, enabling the lender to provide terms that are more favorable to a buyer.

3. Rural Housing Services/Farm Service Agency (RHA/FSA)

RHS/FSA-guaranteed USDA's Rural Housing Service offers a variety of programs to build or improve housing and essential community facilities in rural areas. They provide loans, grants and loan guarantees for single- and multi-family housing, childcare centers, fire and police stations, hospitals, libraries, nursing homes, schools, first responder vehicles and equipment, housing for farm laborers. The RHS/FSA also provides technical assistance loans and grants in partnership with

non-profit organizations, Indian tribes, state and federal government agencies, and local communities.

D. Conventional Loans

A conventional loan is a mortgage that is not sponsored by government but is available through a private lender. Most mortgages issues are through conventional loans. Some conventional loans must meet the requirements of Fannie Mae and Freddie Mac, the two largest buyers of mortgage loans in the United States. Studies of conventional loans in HMDA data have shown that commercial banks and thrift institutions lend less to areas (or tracts) that are low-income and predominantly minority concentrated. Studies have also shown that a substantial portion of home purchase loans extended in predominantly minority middle-income areas are government-backed, while a similar pattern does not hold for white neighborhoods with similar incomes. Such practices have the potential to constitute discrimination and are known as redlining. The practice of redlining is a barrier to fair housing. In the case of the City of Torrance, 94% of the home purchase loans are conventional bank loans.

E. Lending Findings

In analyzing the HMDA data for the calendar year of 2023, several findings revealed implications of potential impediments to fair housing. As shown in Table 21, there were 1,195 home loan applications submitted in calendar year 2023. Of this number, the majority of loans applied for were conventional bank home mortgages, followed by FHA, and a few VA loans.

Table 22 shows the actions for the 1,195 home loan applications, with a majority of the applications (92.97%) approved. The most common reason for denial was “debt-to-income ratio” followed by “credit application incomplete” and “credit history.”

The next table, Table 23, shows the income level of loan applicants. The majority of the loans, 91.13%, were for residents at over 120% Area Median Income (AMI).

Table 24 shows the racial breakdown of loan applications, with White (30.46%) and Asian (27.78%) as the most predominant racial categories. However, it should be noted that “race not available” was the highest percentage at 35.23%.

For ethnicity, 55.56% of households identify as Not Hispanic/Latino, with only 9.87% identifying as Hispanic/Latino or Joint. However, it should be noted that ethnicity was not available for 31.63% of applicants.

Table 25 shows the top 10 lenders providing mortgage loans to City residents. This table highlights the lenders who have received the highest number of applications as well as the lenders with higher approval ratings.

Overall, the data indicates the most common home loans in Torrance are for White, Non-Hispanic Latino applicants with over 120% AMI.

**Table 21
Loan Type**

Loan Type	Approved Loans	% of Total Loans
Conventional	1126	94.23%
FHA	39	3.26%
VA	30	2.51%
Other	0	0%
Total	1195	100%

Source: HMDA Torrance 2023

**Table 22
Loan Application Results**

Action	Number	Percentage
Application approved but not accepted	666	55.73%
Application denied	48	4.02%
Application withdrawn by applicant	73	6.11%
File closed for incompleteness	153	12.80%
Purchased loan	57	4.77%
Preapproval request denied	192	16.07%
Preapproval request approved but not accepted	1	0.08%

Source: HMDA Torrance 2023

**Table 23
Loan Application by Income Level**

0-100% FMR		100-120% FMR		Over 120%	
#	%	#	%	#	%
24	2.01%	82	6.86%	1089	91.13%

Source: HMDA Torrance 2023

**Table 24
Loan Applications by Race**

Race	Number of Applicants	Percentage
2 or more minority races	2	0.17%
American Indian or Alaska Native	3	0.25%
Asian	332	27.78%
Black or African American	16	1.34%
Joint	53	4.44%
Native Hawaiian or Other Pacific Islander	4	0.33%

Race Not Available	421	35.23%
White	364	30.46%
Grand Total	1195	100.00%

Source: HMDA Torrance 2023

Table 25
Top 10 Lenders

Lender	Count of Activity	%
Bank of America	209	8.19%
JP Morgan Chase Bank	203	7.95%
US Bank National Association	157	6.15%
United Wholesale Mortgage LLC	120	4.70%
Rocket Mortgage LLC	101	3.96%
Citibank	96	3.76%
Kinecta	70	2.74%
21st Mortgage Corporation	65	2.55%
Wells Fargo	61	2.39%
PennyMac Loan Services	57	2.23%

Source: HMDA Torrance 2023

1. Refinancing

Refinancing is the process of replacing an existing mortgage with a new loan. Typically, people refinance their mortgage in order to reduce their monthly payments, lower their interest rate, or change their loan program from an adjustable-rate mortgage to a fixed-rate mortgage. According to 2023 HMDA data, 284 of the loan actions in Torrance were for refinancing.

2. Home Improvement

A home improvement loan is used to remodel or repair a private residence. Home improvement loans are usually short-term. They may or may not be secured by the homes whose work they finance, but those that are secured generally carry lower interest rates. According to 2023 HMDA data, 390 of the loan's actions were for home improvement.

CHAPTER 5 PUBLIC POLICES

Public policies established at the federal, state, and local levels can affect housing development and therefore, may have an impact on the range and location of housing choices available to residents. Fair housing laws are designed to encourage an inclusive living environment and active community participation. An assessment of public policies and practices enacted by jurisdictions can help determine potential impediments to fair housing opportunity. This section presents an overview of government regulations, policies, and practices enacted by each of the jurisdictions that may affect fair housing choice.

A. Public Policies and Programs Affecting Housing Development

The City's General Plan, Housing Element, Land Use Element, Building Code, Zoning Code, Consolidated Plan, and other documents have been reviewed to evaluate the following potential impediments to fair housing choice and affordable housing development:

- Local zoning, building, occupancy, health and safety codes;
- Public policies and building approvals that add to the cost of housing development;
- Moratoriums or growth management plans;
- Residential development fees;
- Administrative policies affecting housing activities;
- Policies that restrict housing or community development resources for areas of minority concentration, or policies that inhibit employment of minorities or individuals with disabilities;
- Interdepartmental coordination between agencies that provide housing or community development resources to areas of minority concentration or to individuals with disabilities;
- Availability of public transportation and social services for persons with disabilities; and
- Community representation on boards and commissions.

The General Plan of a jurisdiction establishes a vision for the community and provides long-range goals and policies to guide the development in achieving that vision. Two of the seven state-mandated General Plan elements, which includes the Housing Element and Land Use Element, have direct impact on the local housing market in terms of the amount and range of housing choice. The local Zoning Ordinance, which implements the Land Use Element, is another important document that influences the amount and type of housing available in a community (i.e. the availability of housing choice).

1. Housing Element Law and Compliance

As one of the State-mandated elements of the local General Plan, the Housing Element is the only element with specific statutory requirements and is subject to review by the State Department of Housing and Community Development (HCD) for compliance with State law. Housing Element law requires that local

governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law acknowledges that, for the private market to adequately address housing needs and demand, local governments must adopt land use and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. Specifically, the Housing Element must:

- Identify adequate sites which will be made available through appropriate zoning and development standards and with services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the community's housing goals;
- Assist in the development of adequate housing to meet the needs of low- and moderate income households;
- Address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing;
- Conserve and improve the condition of the existing affordable housing stock; and
- Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, disability, sexual orientation, gender identification, or any other arbitrary factor.

The City's 2014-2021 Housing Element was adopted by the City Council on June 14, 2022. The City's 2021-2029 Housing Element identified the following goals related to AFFH:

Table H-60: AFFH Meaningful Actions Matrix

HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2021-2029 Metrics
Fair Housing Enforcement and Outreach				
Program 18 (Enforce Fair Housing Laws)	Continue to provide information to help increase awareness of fair housing protections. Hold at least one outreach event annually	Ongoing, with annual event	Target North, West, Central, East, and Southeast neighborhoods	Outreach to 1,000 residents, landlords, and housing professionals
	Create an outreach plan to educate local landlords. Hold at least one outreach event annually.	By June 2023, with annual event	Target North, West, Central, East, and Southeast neighborhoods	
	Advertise the availability of fair housing services	Ongoing	Target North, West, Central, East, and Southeast neighborhoods	

	using diverse methods.			
Income Diversity				
Program 6 (ADUs) / Objective 1 (ADU Monitoring)	Evaluate production of ADUs, including income distribution. Develop a monitoring metric that evaluates locations of affordable ADUs. If monitoring results indicate limited ADUs in higher resource areas, develop incentives to encourage ADU production in those neighborhoods	April 1, 2023	Target West, Central, East, and Southeast neighborhoods	Achieve 75% of ADUs affordable to lower and moderate-income households in higher resource neighborhoods
Program 9 (Affordable Housing Development) / Objectives 12 (Pursue/Prioritize Funding)	Pursue additional State and federal funding for affordable development. Prioritize use of City grant funds to incentivize/partner with developers to pursue affordable housing in the City	No less than annually check the websites of HUD, State HCD, and Los Angeles County Development Authority (LACDA) for potential funding sources and apply for eligible programs		Facilitate the development of 250 affordable housing units through additional funding/grants. Target 30% of affordable units in lower income areas and 30% in higher income areas, with the balance throughout the City to

				avoid over concentration in specific neighborhoods.
Program 10 (Rental Assistance Program) / Objective 1 (Housing Choice Voucher Program)	Support efforts to maintain, and possibly to increase, the current number of Housing Choice Vouchers, and direct eligible households to the program Evaluate the distribution of HCVs in North, West, Central, East, and Southeast neighborhoods and endeavor to promote equitable distribution	Evaluate annually	Target North, West, Central, East, and Southeast neighborhoods	Increase the use of HCVs by 10 percent Promote voucher use to target 30 percent of new vouchers in higher income areas.
Program 10 (Rental Assistance Program) / Objective 2 (Housing Choice Voucher Program Information)	Provide information and referrals to landlords regarding participation in the Housing Choice Voucher Program	Ongoing, at least annually	Target North, West, Central, East, and Southeast neighborhoods	
Program 10 (Rental Assistance Program) / Objective 3 (Rental Assistance)	Continue to provide rental assistance to senior households at the Coleman Court and Ocean Terrace developments as feasible based on financial resources	Ongoing	N/A	
Displacement				
Program 1 (Adequate Sites to	Rezone per identified objectives in Program 1 to	By October 15, 2024	Target North, Central, Southwest neighborhoods	Facilitate the developme

Accommodate RHNA) / Multiple Objectives	implement additional and affordable housing opportunities in areas of city with populations vulnerable to displacement (Figure D-31)			nt of 3,166 affordable units
Program 1.7: Adequate Sites to Accommodate RHNA (Add Religious Institution Housing Overlay Zone or RIH-OZ)	Add a new RIH-OZ on properties designated in the Sites Inventory to allow lower- income stand-alone multi-family residential & mixed-use without discretionary action. (Housing that is proposed for any of the sites that is not lower income must develop to the existing base zone and comply with associated development and design standards and would be subject to the Inclusionary Housing Ordinance, if adopted)	By October 15, 2024	Citywide ordinance, but creates new affordable housing opportunities in highest and high resources areas, including West, Central, and Southwest neighborhoods	Facilitate development of 268 affordable housing units in RIH-OZ Target 30% of affordable units in lower income RIH-OZ areas and 30% in higher income RIH-OZ areas, to avoid overconcentration in specific neighborhoods.
Program 3 (Removal of Government Constraints) / Objective 5 (Expand Use of Senior Housing Standards)	The City will consider expanding the use of the existing Senior Housing Standards (which are more lenient than typical multifamily development standards) to allow	By October 15, 2024	Citywide opportunity, as expanded use of Senior Housing Standards would facilitate more affordable housing for renters and owners	Facilitate the development of 3,166 affordable units

	developers to use the Senior Housing Standards for non-senior projects if the units are restricted to lower- or moderate-income households			
Program 6 (Accessory Dwelling Units) / Objective 2 (Financial Assistance for Affordable ADUs)	City will work with federal, state, and local agencies to try to identify and secure funding for homeowners who are interested in building an accessory dwelling unit (ADU) and are willing to offer it as an affordable rental.	By June 14, 2023 & will reevaluate funding options annually.	Encourage ADUs in high and highest resource areas	Facilitate the development of 288 affordable ADUs
Program 6 (Accessory Dwelling Units) / Objective 6 (Promote Housing Voucher Programs for ADUs)	City will promote the Housing Choice Voucher Program to homeowners for rental of their ADU to an affordable household	By June 14, 2023, and ongoing	Encourage ADUs in high and highest resource areas	Facilitate the development of 288 affordable ADUs
Program 6 (Accessory Dwelling Units) / Objective 2 (Financial Assistance for Affordable ADUs)	City will work with federal, state, and local agencies to try to identify and secure funding for homeowners who are interested in building an accessory dwelling unit (ADU) and are willing to offer it as an affordable rental.	By June 14, 2023 & will reevaluate funding options annually.	Encourage ADUs in high and highest resource areas	Increase the use of HCVs by 10 percent

<p>Program 6 (Accessory Dwelling Units) / Objective 6 (Promote Housing Voucher Programs for ADUs)</p>	<p>City will promote the Housing Choice Voucher Program to homeowners for rental of their ADU to an affordable household</p>	<p>By June 14, 2023, and ongoing</p>	<p>Encourage ADUs in high and highest resource areas</p>	<p>Increase the use of HCVs by 10 percent</p>
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Environmental Health

<p>Program 20: Environmental Justice</p>	<p>Adopt and implement an Environmental Justice Element (EJE) to reduce inequities by addressing specific environmental hazards faced by disadvantaged communities in meaningful policy and action.</p> <p>When preparing the EJE, ensure that the North, East, and Central neighborhoods receive targeted attention. Conduct focused outreach to residents in those neighborhoods to ensure their issues are understood and they are involved in developing policies and actions</p>	<p>By October 15, 2024</p>	<p>Target North, East, Central neighborhoods</p>	<p>As part of development of the new EJE, establish metrics that are related to the identified issues and track them not less than every 2 years</p>
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Lack of Affordable Housing

<p>Program 1.7: Adequate Sites to Accommodate RHNA (Add Religious Institution Housing Overlay Zone or RIH-OZ)</p>	<p>Add a new RIH-OZ on properties designated in the Sites Inventory to allow lower- income stand-alone multi-family residential & mixed-use without discretionary action. (Housing that is proposed for any of the sites that is not lower-income must develop to the existing base zone and comply with associated development and design standards and would be subject to the Inclusionary Housing Ordinance, if adopted)</p>	<p>By October 15, 2024</p>	<p>Citywide ordinance, but creates new affordable housing opportunities in highest and high resources areas, including West, Central, and Southwest neighborhoods</p>	<p>Facilitate development of 268 affordable housing units in RIH-OZ Target 30% of affordable units in lower income RIH-OZ areas and 30% in higher income RIH-OZ areas, with the balance throughout RIHOZ areas to avoid over concentration in specific neighborhoods.</p>
<p>Program 3 (Removal of Government Constraints) / Objective 5 (Expand Use of Senior Housing Standards)</p>	<p>The City will consider expanding the use of the existing Senior Housing Standards (which are more lenient than typical multifamily development standards) to allow developers to use the Senior Housing Standards for non-senior projects if the units are restricted</p>	<p>By October 15, 2024</p>	<p>Citywide opportunity, as expanded use of Senior Housing Standards would facilitate more affordable housing for renters and owners</p>	<p>Facilitate the development of 3,166 affordable units</p>

	to lower- or moderate-income households.			
Program 4: Inclusionary Housing Ordinance	Study the option of preparing an Inclusionary Housing Program and determine whether to proceed with an inclusionary ordinance.	By October 15, 2024	Citywide ordinance but would create new affordable housing opportunities in highest and high resources areas, including West, Central, and Southwest neighborhoods. Also, would benefit neighborhoods with a higher renter cost burden, such as North Torrance.	Facilitate the development of 3,166 affordable units Target 30% of affordable units in lower income areas and 30% in higher income areas, with the balance throughout the City to avoid over concentration in specific neighborhoods.
Program 5: Density Bonus	Promote use of density bonus incentives to developers and provide technical assistance to developers in utilizing density bonus for maximized feasibility and to meet local housing needs.	By October 15, 2023	Citywide ordinance. Promote use of density bonus to developers who propose to develop in LMI neighborhoods	Facilitate the development of 3,166 affordable units

Program 6 (Accessory Dwelling Units) / Objective 2 (Financial Assistance for Affordable ADUs)	City will work with federal, state, and local agencies to try to identify and secure funding for homeowners who are interested in building an accessory dwelling unit (ADU) and are willing to offer it as an affordable rental.	By June 14, 2023 & will reevaluate funding options annually.	By June 14, 2023 & will reevaluate funding options annually.	Facilitate the development of 288 affordable ADUs
Program 6 (Accessory Dwelling Units) / Objective 6 (Promote Housing Voucher Programs for ADUs)	City will promote the Housing Choice Voucher Program to homeowners for rental of their ADU to an affordable household	By June 14, 2023, and ongoing	Encourage ADUs in high and highest resource areas	Facilitate the development of 288 affordable ADUs
Program 9 (Affordable Housing Development) / Objective 1 (Outreach to Affordable Housing Developers)	Conduct an affordable housing meeting with affordable housing developers. If the City has City-owned land that is available and ready for development, invite proposals from interested developers.	By June 14, 2023, & at least every other year thereafter	Citywide	Minimum of 4 outreach events
Program 9 (Affordable Housing Development) / Objective 4 (Pursue Funding)	Pursue additional state and federal funding for affordable housing development.	No less than annually, beginning in 2023	Citywide	Facilitate the development of 3,166 affordable units
Program 9 (Affordable Housing Development) / Objective 5	Continue to work with South Bay Cities Council of Governments (SBCCOG) as it explores the	Ongoing	Citywide	Facilitate the development of 3,166 affordable units

(Regional Housing Trust)	feasibility of a Regional Housing Trust that could facilitate the development of affordable housing in participating South Bay cities including Torrance			
Program 9 (Affordable Housing Development) / Objective 8 (Affordable Housing Production Monitoring)	Monitor production of affordable housing in Torrance and evaluate the degree to which sites that have been identified in the Sites Inventory as affordable to lower- and moderate-income households, including mixed-income developments have been or are being developed in those income categories. If not, reevaluate programs and objectives accordingly.	By April 1, 2023, and ongoing	Citywide	Facilitate the development of 3,166 affordable units
Program 13 (Preservation of Affordable Rental Housing)	Support the preservation of affordable units at risk of converting to market rents	Ongoing	N/A	
Historic Patterns that Affect Exclusion				
Program 1 (Adequate Sites to Accommodate RHNA) / Multiple Objectives	Revise Land Use Element and Zoning Code to: <ul style="list-style-type: none"> • increase density ranges as per programs; 	By October 15, 2024	Target highest and high resources areas	Monitor development of affordable housing units to facilitate

	<ul style="list-style-type: none"> • add new Residential/Mixed Use Housing Overlay(s) (R/MU-OZ); • incentivize new target densities; • revise the HBCSP to add MU to more districts and consider allowing standalone residential in more districts; • implement the Housing Corridor Study areas; and • add the RIH-OZ. 			53% in highest resources areas and 39% in high resources areas.
Program 3 (Removal of Government Constraints) / Objective 4 (Revise Development Standards to Remove Government Constraints)	Reevaluate the Zoning Code to address and reduce identified constraints to development of housing, including parking, height, open space FARs, etc.	By October 15, 2024	Facilitate the development of 3,166 affordable units	
Program 6 (Accessory Dwelling Units) / Objective 8 (Outreach and Information to Promote ADU Construction)	Maintain and distribute literature on funding opportunities and programs promoting construction of affordable rental ADUs.	By June 14, 2023, and ongoing throughout the Planning Period	Although a citywide objective, focus on highest resource areas and Central and Southwest neighborhoods	Facilitate the development of 288 affordable ADUs
Program 9 (Affordable Housing Development) / Objective 8 (Housing Production Monitoring)	Monitor production of affordable housing and evaluate the degree to which the sites that have been identified in the Sites Inventory as affordable to lower-	By April 1, 2023, and annually thereafter	Although a citywide objective, evaluate areas that are predominantly white and highest income areas (per data in Appendix D)	Monitor development of affordable housing units to facilitate 53% in highest

	and moderate-income households, including mixed-income developments have been or are being developed in those income categories. As part of monitoring program, develop a metric to evaluate success in adding affordable housing (including new residential or MU developments, ADUs, and housing in RIH-OZs) in areas that are predominantly white and highest income areas			resources areas and 39% in high resources areas.
Program 22 (Removal of Racial Covenants)	Develop detailed instructions for removing race-based restrictions from residential property titles, and provide as public information online and at the planning counter	By October 15, 2022; advertise and make available on an ongoing basis	Although a citywide objective, focus on areas that are predominantly white	Reduce dissimilarity index by 10 percent

2. Land Use Element

The Land Use Element of the City’s General Plan designates the general distribution, location, and extent of uses for land planned for housing, business, industry, open space, and public or community facilities. As it applies to housing, the Land Use Element establishes a range of residential land use categories, specifies densities (typically expressed as dwelling units per acre [du/ac]), and suggests the types of housing appropriate in a community. Residential development is implemented through zoning to which there are development standards specified within each zoning district. Residential density requirements affect both the intensity of development and number of people per square miles within a zoning district.

Per the City’s General Plan, density is defined in the following way:

- Low Density Residential: 0 - 9 du/ac
- Low-Medium Density Residential: 9.1-18 du/ac
- Medium Density Residential: 18.1-31 du/ac
- High Density Residential: 44.1 + du/ac

Generally, higher densities allow developers to take advantage of economies of scale, reduce the per-unit cost of land and improvements, and reduce development costs associated with new housing construction. Reasonable density standards ensure the opportunity for higher-density residential uses to be developed within a community, increasing the feasibility of producing affordable housing. Minimum required densities in multi-family zones (R-3) ensure that land zoned for multi-family use, the supply of which is often limited, will be developed as efficiently as possible for higher density uses. The City does permit density standards that are adequate for low- and moderate-income housing development.

3. Zoning Ordinance

Higher density housing reduces land costs on a per-unit acre basis and thus facilitates the development of affordable housing. Restrictive zoning that requires unusually large lot and building size can increase housing costs and can impede housing production. Zoning Code regulations accommodate a wide range of housing types including mobile homes, second units, group care facilities, and senior housing. Development standards such as density, height, setbacks, and parking are also specified in the Zoning Code.

a. Definition of a Family

A community's zoning ordinance can restrict access to housing for relations failing to qualify as a "family" by the definition specified in the zoning ordinance. Even if the code provides a broad definition, deciding what constitutes a "family" should be avoided by cities to prevent confusion or give the impression of restrictiveness. The City of Torrance does not define family in the zoning code.

California court cases, for example *City of Santa Barbara v. Adamson* (1980) and the *City of Chula Vista v. Pagard* (1981), have ruled that an ordinance that defines "family" as (a) an individual, (b) two or more persons related by blood, marriage, adoption, or (c) a group of not more than a certain number of unrelated persons as a single housekeeping unit is invalid. Court rulings stated that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the city, and therefore violates rights of privacy under the California Constitution. A zoning ordinance also cannot regulate residency by discrimination between biologically related and unrelated persons.

b. Residential Care Facilities

The Lanterman Developmental Disabilities Act of the California Welfare and Institutions Code (Sections 5115 and 5116) declares that mentally and

physically disabled persons are entitled to live in normal residential surroundings. The use of property for the care of six or fewer disabled persons is residential use for the purpose of zoning. A state-authorized, certified or licensed family care home, foster home, or group home, or a group home serving six or fewer disabled persons or dependent and neglected children on a 24-hour-a day basis is considered a residential use that is permitted in all residential zones for single-family dwellings. No local agency can impose more restrictive zoning or building and safety standards on these homes.

The Torrance Zoning Code defines a residential care facility as follows:

“A facility licensed by the State to provide twenty-four (24) hour residential care to persons in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual, excluding jails and other facilities. Such facilities may provide nursing, dietary and other personal services, but not surgery or other primary medical treatments such as are customarily provided in convalescent facilities or hospitals. This classification includes retirement homes.”

Consistent with state law, the City facilitates the development of small residential care facilities by treating licensed facilities that serve six or fewer persons as regular residential uses. According to the Torrance Zoning Code, the City permits large residential care facilities serving more than six persons in all residential zones subject to approval of a large family day care permit. Although a ministerial permit, state law now requires large family day care to be treated the same as small family day care, allowed as a permitted use with no differentiation between it and any other permitted residential use. The City has not adopted a spacing requirement for residential care facilities.

c. Accessory Dwelling Units

Accessory dwelling units (ADUs) are attached or detached dwelling units that provide complete independent living facilities for one or more persons and that are secondary to the primary dwelling unit on a lot. The units must include permanent provisions for living, sleeping, cooking, laundry and sanitation. ADUs may be an alternative source of affordable housing for low-income households, particularly for seniors.

d. Mobile Homes/Manufactured Housing

State legislation mandates the inclusion of mobile home/manufactured housing in a jurisdiction's land use policy. The City permits mobile homes or manufactured housing within the R-1 (Single Family Residential), R-2 (Townhouse & Cluster), and R-3 (Multi-Family Residential) zone by right; and, within the PRD (Planned Residential Development) zone with a CUP.

e. Density Bonuses

In March 2010, the City amended its municipal code to comply with State Density Bonus law. The amendment repealed old density bonus language and replaced it with a section that references the State law and any amendments

thereto. The City will continue to promote density bonus provisions for residential development projects.

f. Parking Requirements

The City's Zoning Code requires two covered parking spaces (i.e. garage) for each dwelling units with three or fewer bedrooms, and units with four or more bedrooms require three covered spaces (i.e. garage). In addition, 1 guest space must be provided for every 2 dwelling units. Parking standards can be reduced in certain circumstances such as ADUs, Senior Housing, Affordable Housing, Density Bonus Applications and within the Housing Corridor Overlay.

g. Senior Housing/Affordable Housing

The City provides flexible development standards, including reduced parking standards and smaller unit sizes in order to encourage the development of senior and affordable housing projects. The City also encourages preservation of these units as affordable housing, as conversion to a market-rate use requires additional on-site parking, development of larger units, and other standards to comply with the Zoning code.

h. Building Codes

The City has adopted the State Uniform Building and Housing Codes. These codes are considered to be the minimum necessary to protect the public health, safety, and welfare. No local amendment has either been initiated or approved that directly affects housing standards or processes.

i. Long-term facility for the chronic mentally ill; Institutions for the treatment of alcoholics; Mental hygiene home

The above uses are a conditionally permitted use in the R-4, R-P, C-1, C-3, C-4, C-5, and HMD Zones.

j. Emergency Shelters and Low Barrier Navigation Centers

Emergency shelters are defined facilities that provide immediate and short-term housing and supplemental service, such as food, counseling, and access to other social programs, to persons or families experiencing homelessness. Emergency shelters are permitted by right in the M-2 district. The Housing Element stated a need to revise existing parking standards for shelters based solely on staffing levels. A "Low Barrier Navigation Center" is defined as "a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." AB 101 requires jurisdictions to allow a Low Barrier Navigation Center development of up to 50 units by right in areas zoned for mixed uses and nonresidential zones permitting multi-family uses if the development meets specified requirements. The City of Torrance currently operates a 40-unit homeless shelter on Civic Center grounds for people experiencing homelessness.

k. Transitional and Supportive Housing

Transitional housing provides longer term housing (up to two years), coupled with supportive services such as job training and counseling to individuals and families who are transitioning to permanent housing. State law requires transitional housing to be defined as a residential use and subject only to the same regulations as comparable residential uses. The Torrance Land Use Code does not currently reference transitional housing directly. Consistent with State law, small transitional housing serving six or fewer people is considered a single-family residential use and permitted in all zones where residential uses are permitted. Transitional housing for more than seven people and operated as a residential care facility is permitted in both the R-P and R-4 zones. Transitional housing that functions as a regular multi-family use (such as apartments) is permitted where multi-family uses are permitted.

California Government Code Section 65582 defines supportive housing as housing with no limits on the length of stay that is occupied by a “target population” and links this population with the provision of housing and social services. “Target population” means persons with low incomes who have one or more disabilities, including mental illness, HIV/AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people. State law requires supportive housing to be defined as a residential use and subject only to the same regulations as comparable residential uses. Supportive housing is not subject to any regulations beyond what is required for other residential uses in the same zone. AB 2162 further requires supportive housing projects of 50 units or fewer to be permitted by right in zones where multi-family and mixed-use developments are permitted, when the development meets certain conditions. The City may choose to allow larger supportive housing projects by right in these zones. The bill also prohibits minimum parking requirements for supportive housing within ½ mile of public transit.

l. Public Housing Authority

There are no public housing units in the City. Torrance is one of four independent Service Planning Area (SPA) 8 cities that has its own Public Housing Authority (PHA). The PHA administers Housing Choice Vouchers (HCV), Veterans Affairs Supportive Housing Vouchers (VASH), and Emergency Housing Vouchers (EHV). In FY 23-24, the City began administering a new HUD allocation of Stability Vouchers. These vouchers are targeted for households who are homeless, at risk of homelessness, fleeing or attempting to flee domestic violence, dating violence, sexual assault, or

stalking, and veterans who are in one of the preceding categories. The City has approximately 500 assisted households across all voucher programs.

The City's investment in the PHA allows for more extremely-low and low income families to afford to live within the City of Torrance. Per HUD's Housing Choice Vouchers by Tract Tool (Appendix), only one tract in Torrance has over 8% HCVs. Additionally, per HUD's opportunity area toolkit, there is only one area in Torrance with a family poverty rate above 10%. This indicates that the use of housing vouchers in Torrance increases the ability for housing choice in higher income areas throughout the City.

B. Administrative Policies and Programs Affecting Housing Development

1. Moratoriums/Growth Management

Torrance does not have building moratoriums or growth management plans that limit housing construction.

2. Development Fees/Assessments

Development fees and taxes charged by local governments also contribute to the cost of housing. In Torrance, the fees charged for residential developments are designed to offset the cost of permit processing. Examples of fees include Site Plan Review, Special Use Permit application, Environmental Assessment, and Design Review among others. In addition, school impact fees are assessed by the State. The City had a Fee Study conducted in 2024 by Clearsource Financial Consulting and found fees charged by the City are lower than most of the surrounding communities and thus do not unduly restrict the provision of a range of housing choices.

3. Impact Fees

The City imposes development impact fees on new development projects in order to mitigate the impacts caused by new development on public services, infrastructure, and facilities. Impact Fees are different from, and apply in addition to, application fees, which are used to cover the cost of the City's review of a given proposal. The City's impact fees are assessed and collected by the Planning Division. The City had a Fee Study conducted in 2020 by David Tausig and Associates and found fees charged by the City are lower than most of the surrounding communities and thus do not unduly restrict the provision of a range of housing choices.

4. Community Representation

An important strategy for expanding housing choices for all residents is to ensure that residents' concerns are heard. A jurisdiction must create avenues in from which residents can voice concerns. The Torrance Planning Commission is populated by members from the community. The role of this Commission is

discussed below. Overall, the City provides for sufficient community representation in the decision-making process of housing-related matters.

5. Planning Commission

The Planning Commission (PC) reviews and makes decisions on a variety of land use matters such as subdivisions, conditional use permits, precise plans, planned developments, and waivers. The PC also reviews and makes recommendations to the City Council on issues pertaining to the General Plan, Specific Plans, zone changes, Variances, and other policy issues regarding development. The PC consists of seven members appointed by the City Council on an annual basis.

CHAPTER 6 FAIR HOUSING PROFILE

This chapter provides an overview of the institutional structure of the housing industry with regard to fair housing practices. In addition, this chapter discusses the fair housing services available to residents of the City, as well as the nature and extent of fair housing complaints received by the fair housing provider(s). Typically, fair housing services encompass the investigation and resolution of housing discrimination complaints, discrimination auditing/ testing, and education and outreach, including the dissemination of fair housing information. Tenant/landlord counseling services are usually offered by fair housing service providers but are not considered fair housing services.

A. Fair Housing Practices in the Homeownership Market

Part of the American dream involves owning a home in the neighborhood of one's choice. Not all Americans, however, have always enjoyed equal access to homeownership due to credit market distortions, "redlining", steering, and predatory lending practices.

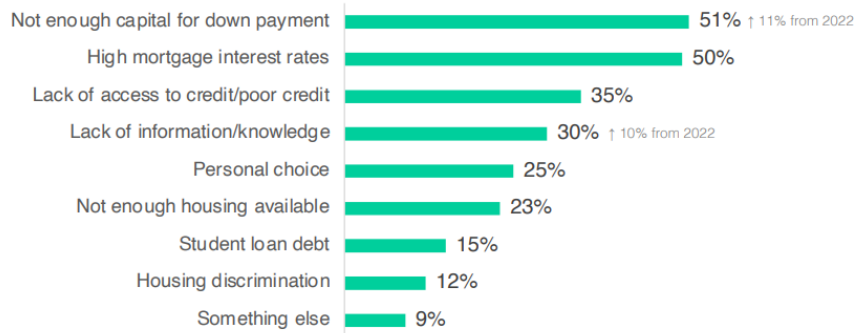
In February 2024, market research firm The Harris Poll released survey results among a nationally representative sample of 2,047 U.S. adults, "Eight in 10 (81%) of renters want to own a house/residence in the future, but over six in 10 (61%) worry they will never be able to. Americans are hoping for the needle to move, with 55% saying they are going to wait for interest rates to drop before making a real estate move. Americans see the current interest rates (50%) and their lack of savings for a down payment (51%) as their biggest barriers from home ownership" (The Harris Poll, The Status of Real Estate in 2024, February 2024).

The 2024 Quality of Life Index, prepared by UCLA's Luskin School of Public Affairs, shows that, "Fewer than a quarter of renters said they thought they would ever be able to buy a home in a part of L.A. where they would want to live. And about half, 51%, of renters reported being pessimistic about their economic future in L.A. County, while 61% of homeowners said they felt optimistic." The Harris Poll found that "not enough capital for down payment" and "high mortgage interest rate" were the top two barriers to homeownership. 12% of respondents stated that Housing Discrimination was a barrier to home ownership for him/her/them.



Lack of capital and high interest rates are the biggest barriers to home ownership for Americans

Which of the following barriers do you feel prevent you from owning a home?



71%

Americans

"I would need to be gifted or inherit money in order to own a home anytime soon."

75% Gen X

60%

Americans

"I pay more rent than I would a mortgage, yet I still don't qualify to become a homeowner."

71% Gen X

HOUS08 Which of the following barriers do you feel prevent you from owning a home? Please select all that apply. (Non-Homeowners n=578)
 HOUS05 How much do you agree or disagree with the following statements? (n=2,047)

10

Source: The Harris Poll February 2024

1. The Homeownership Process

The following discussions describe the process of home buying and likely situations when a person/household may encounter housing discrimination. However, much of this process occurs in the private housing market over which local jurisdictions have little control or authority to regulate. The recourse lies in the ability of the contracted fair housing service providers in monitoring these activities, identifying the perpetrators, and taking appropriate reconciliation or legal action.

2. Advertising

The first thing a potential buyer is likely to do when they consider buying a home is search advertisements either in magazines, newspapers, or the internet to get a feel for what the market offers. Advertisements cannot include discriminatory references such as the use of words describing:

- Current or potential residents;
- Neighbors or the neighborhood in racial or ethnic terms;
- Adults preferred (except for senior or active adult living);
- Perfect for empty nesters;
- Conveniently located by a Catholic Church; or
- Ideal for married couples without kids.

In September 2024, approximately 132 homes were listed on for-sale in the City on Realtor.com. A random sample of 25% (33 listings) of the listings were reviewed to determine if references to something other than the physical description of the available home, amenities, or services was included in the home description. Of the 33 listings reviewed, only 5 included verbiage specific to the

type of household that would be a good fit for the listing. 4 of the listings were specifically towards household size (families with children) and one for first-time homebuyers or people looking to downsize. Many of the listings stated the Torrance Unified School District as a benefit of the area, but did not specifically state that the home would be best suited for children. Today's online home realty sites are more educated about fair housing laws and tend to use general home description language.

Advertising is a sensitive area in real estate. While real estate advertising can be published in other languages, by law an English version of the ad must also be published. Monitoring this requirement is difficult, if not impossible. Even if an agent does not intend to discriminate in an ad, it would still be considered a violation to suggest to a reader whether a particular group is preferred. Previous litigation has set precedence for violations in advertisements that hold publishers, newspapers, Multiple Listing Services, real estate agents, and brokers accountable for discriminatory ads.

Initially, buyers must find a lender that 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 a lot of sensitive information including their gender, ethnicity, income level, age, and familial status. Most of this information is used for reporting purposes required of lenders by the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA). The previous section of this AI provides a detailed analysis of HMDA.

3. Appraisals

Banks order appraisal reports to determine whether a property is worth the amount of the loan they will be giving. Generally speaking, appraisals are based on the comparable sales of properties within the neighborhood of the property being appraised. Other factors are taken into consideration, such as the age of the structure, any improvements made, location, general economic influences, etc.

4. Real Estate Agents

The Fair Housing Act protects constituents from discrimination when engaging in housing-related activities such as buying a home, renting, and seeking housing assistance. Licensed realtors have a responsibility to ensure compliance with federal, state, and local fair housing laws. Real estate professionals may act as agents of discrimination. Some unintentionally, or possibly intentionally, may steer a potential buyer to particular neighborhoods by encouraging the buyer to look into certain areas; others may choose not to show the buyer all choices available. Agents may also discriminate by whom they agree to represent, whom they turn away, and the comments they make about their clients.

Many REALTOR® Associations also host fair housing trainings/seminars to educate members on the provisions and liabilities of fair housing laws, and the

Equal Opportunity Housing Symbol is also printed on all CAR forms as a reminder. Training will help identify instances of discrimination to better help serve each person fairly and equally. This includes ensuring fair housing compliance in advertising and understanding fair housing laws.

5. Covenants, Conditions, and Restrictions (CC&Rs)

Covenants, Conditions, and Restrictions (CC&Rs) are restrictive promises that involve voluntary agreements, run with the land they are associated with, and are listed in a recorded Declaration of Restrictions. The Statute of Frauds (Civil Code Section 1624) requires them to be in writing because they involve real property. They must also be recorded in the County where the property is located in order to bind future owners. Owners of parcels may agree amongst themselves as to the restrictions on a particular land use but, in order to be enforceable, they must be reasonable.

The California Department of Real Estate reviews CC&Rs for all subdivisions of five or more lots, or condominiums of five or more units. This review is authorized by the Subdivided Lands Act and mandated by the Business Professions Code, Section 11000. The review includes a wide range of issues, including compliance with fair housing law. The review must be completed and approved before the Department of Real Estate will issue 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. If the CC&Rs are not approved, the Department of Real Estate will issue a "deficiency notice", requiring the CC&Rs be revised. CC&Rs are void if they are unlawful, impossible to perform or are in restraint on alienation (a clause that prohibits someone from selling or transferring his/ her property). However, older subdivisions and condominium/townhome developments may contain illegal clauses that are enforced by the homeowners' associations. In Torrance, there is likely no available lands for new subdivisions however, redevelopment is happening one property at a time therefore the chance of placing CC&Rs on existing properties is highly unlikely in this market.

One of the programs in the City's Housing Element was to develop detailed instructions for removing race-based restrictions from residential property titles and provide as public information online and at the planning counter.

6. Insurance Industry

Without insurance, banks and other financial institutions lend less. For example, if a company excludes older homes from coverage, lower income and minority households who can only afford to buy in older neighborhoods may be disproportionately affected. Another example includes private mortgage insurance (PMI). PMI obtained by applicants from Community Reinvestment Act (CRA) protected neighborhoods is known to reduce lender risk. Redlining of lower income and minority neighborhoods can occur if otherwise qualified applicants are denied or encouraged to obtain PMI. ("Borrower and Neighborhood Racial

Characteristics and Financial Institution Financial Application Screening"; Mester, Loretta J; Journal of Real Estate Finance and Economics; 9 241- 243; 1994)

B. National Association of REALTORS® (NAR)



The National Association of REALTORS® (NAR) has developed a Fair Housing Program to provide resources and guidance to REALTORS® in ensuring equal professional services for all people. The term REALTOR® identifies a licensed professional in real estate who is a member of the NAR; however, not all licensed real estate brokers and salespersons are members of the NAR.

1. Code of Ethics

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."

Additionally, Standard of Practice Article 10- 1 states that "REALTORS® shall not volunteer information regarding the racial, religious or ethnic composition of any neighborhood and shall not engage in any activity which may result in panic selling. 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."

2. Diversity Certification

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 will signal to customers that the real estate professional has been trained on working with diversity in 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.

C. California Department of Real Estate (DRE)



The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons. As noted earlier, not all licensed brokers and salespersons are members of the National or California Association of REALTORS®.

The DRE has adopted education requirements that include courses in ethics and in 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 will enable an agent to identify and avoid discriminatory practices when providing real estate services to clients.

The law requires, as part of the 45 hours of continuing education, completion of five mandatory three-hour courses in Agency, Ethics, Trust Fund Handling and Fair Housing and Risk Management. These licensees will also be required to complete a minimum of 18 additional hours of courses related to consumer protection. The remaining hours required to fulfill the 45 hours of continuing education may be related to either consumer service or consumer protection, at the option of the licensee.

D. California Association of REALTORS® (CAR)



The California Association of REALTORS® (CAR) is a trade association of 92,000 realtors statewide. As members of organized real estate, realtors also subscribe to a strict code of ethics as noted above. CAR has recently created the position of Equal Opportunity/ Cultural Diversity Coordinator. CAR includes language on many standard forms disclosing fair housing laws to those involved. CAR holds three meetings per year for its general membership, and the meetings typically include sessions on fair housing issues. Current outreach efforts in the Northern California area are directed to underserved communities and state- licensed brokers and salespersons who are not members of the CAR. CAR also offers a course that covers discrimination and housing, types of violations, advertising rules, ADA, penalties, fir employment practices, fair credit practices. Real estate professionals must have a clear knowledge of both the theory and practice of Fair Housing when conducting business.

E. South Bay Association of Realtors® (RSAOR)



The South Bay Association of Realtors serves realtors in Torrance and surrounding communities, including Carson, Gardena, Lomita, and Redondo Beach, to name a few. The South Bay Association of Realtors provides many continuing education opportunities to members, including courses on the topics of ethics and professional conduct, trust funds, fair housing, and real estate contracts. Realtors with fair housing questions, or who are in need of additional information, are usually referred to California Association of Realtors. The South Bay Association of Realtors also provides resource information on ethics and standards of practice.

F. California Department of Consumer Affairs (DCA)

The Department of Consumer Affairs (DCA) exists to promote and protect the interests of California consumers. The DCA helps consumers learn how to protect themselves from unscrupulous and unqualified individuals. The DCA also protects professional from unfair competition by unlicensed practitioners.

The DCA is dedicated to enhancing individual consumer access to services and resources. To help fulfill its mission of promoting and protecting the interests of consumers, DCA will continue to build and maintain effective relationships with:

- consumer and public interest groups
- the business and professional community
- law enforcement agencies
- other government agencies

The DCA assists renters by publishing *A Guide to Residential Tenants' and Landlords' Rights and Responsibilities*. The booklet focuses on California laws that govern the landlord-tenant relationship and suggests things that both the landlord and tenant can do to make the relationship a good one. Although the booklet is written from the tenant's point of view, landlords can also benefit from its information.

G. California Apartment Association (CAA)

The California Apartment Association (CAA) is the country's largest statewide trade association for rental property owners and managers. The CAA incorporated in 1941 to serve rental property owners and managers throughout California. CAA represents rental housing owners and professionals who manage more than 800,000 rental units. Under the CAA umbrella, numerous other apartment associations cover specific geographic areas throughout the State, including Torrance.

The CAA supports the spirit and intent of all local, State, and federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation, or national origin. Members of the CAA agree to abide by the following provisions of their Code for Equal Housing Opportunity:

- *We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing accommodations to all persons on an equal basis:*
- *We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our resident's tenancy;*
- *We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we do not engage in any behavior or action that would result in steering; and*
- *We agree not to print, display, or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing.*

H. Apartment Association of Greater Los Angeles (AAGLA)

The Apartment Association of Greater Los Angeles (AAGLA) serves all of Southern California and had approximately 14,000 members. The AAGLA publishes a monthly magazine, *Apartment Age*, and provides information packets to owners and managers interested in joining the organization. The magazine periodically features articles that aim at educating its members regarding fair housing laws. Through a variety of seminars, workshops, and educational courses, AAGLA provides members with information and

training on such topics as ethics, credit checks, addressing code enforcement violations, property management and pre-inspection training, etc. AAGLA has a fair housing representative who conducts a fair housing workshop and provides information on fair housing. In addition to workshops and seminars, AAGLA offers its Registered Residential Manager Course. The course is a California Apartment Association- approved program that offers a series of classes on landlord/tenant issues, ethics, marketing, property management, fair housing, and other issues.

I. Fair Housing Practices in the Rental Housing Market

1. Advertising

Rental advertisements should not include discriminatory references. In September 2024, there were 158 rental listings online at Apartments.com a random sample of 47 (30%) were reviewed. Among these ads, 16 (30.04% of the listings) were found to contain potentially discriminatory language. A large portion of the problematic language involves "no pets" policies. There was one ad that specified that the unit would be "perfect for families and professionals". Persons with disabilities are one of the protected classes, and apartments must allow "service animals" and "companion animals," under certain conditions. Service animals are animals that are individually trained to perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure, or performing other special tasks. Service animals are working animals, not pets. Companion animals, also referred to as assistive or therapeutic animals, can assist individuals with disabilities in their daily living and, as with service animals, help disabled persons overcome the limitations of their disabilities and the barriers in their environment.

Although housing providers have the right to create a "no pets rule", housing providers must make exceptions to the rule as a reasonable accommodation if it is necessary to allow a person with a disability to have an equal opportunity to enjoy housing. Refusing to allow necessary service animals or emotional-support animals is illegal discrimination. Service animals and emotional-support animals are not subject to breed, size, or weight restrictions ordinarily applied to pets, and tenants cannot be charged pet deposits or pet rent for them.

Persons with disabilities have the right to ask their housing provider to make a reasonable accommodation in a "no pets" policy in order to allow for the use of a companion or service animal. However, in the case of rental ads that specifically state, "No pets," some disabled persons may not be aware of their right to ask for an exception to this rule. A "no pets" policy could, therefore, be interpreted as potentially discriminatory. Of the 47 rental listings surveyed in September 2024, 15 ads (32%) included language to specifically ban pets or "Pets allowed with additional Pet Deposit". These listings failed to indicate a potential renter's ability to seek a reasonable accommodation

Upon review of the listings collected, there was a significant number of references to the proximity to various educational institutions such as an elementary school, high school, college, or vocational college campus. Of the 47 rental listings surveyed, at least 7 (14%) either indicated the location of a nearby school, or described a listing as belonging to a particular school district. While these descriptions are not discriminatory, the consistency of verbiage that includes phrases such as "Situated within the esteemed TORRANCE SCHOOL DISTRICT" or "Conveniently located within an award-winning school district", may be suggestive towards families with children or can be perceived as an indication of the pedigree of the community.

2. Manufactured Housing

The Mobile Homes Manufactured Housing Act of 1980, as amended, provides buyers of manufactured homes (MH-units) protection by ensuring all sales representatives are licensed and must provide evidence of completed, required Preliminary Education (PE) or Continuing Education (CE) courses. The Occupational Licensing (OL) Program ensures compliance with Fair Housing laws, regulations governing licensing, escrows, and sales through required education, investigating complaints and illegal practices.

3. Property Manager/Housing Provider



The Los Angeles Housing & Community Investment Department offers a Property Management Training Program (PMTP) that includes training on individual modules including (for more information visit the AAGLA website or APT-ASSOC website):

- Inspections and Building Codes and Standards
- Property Maintenance
- Property Marketing and Advertising
- Understanding and complying with complaints and orders
- Major repairs in occupied properties
- Techniques on early detection of illegal activities
- Fair Housing Act
- Local and State Policies and Regulations (Section 8, Rent Stabilization and more)

4. Responding to Ads

Differential treatment of those responding to advertisements is a growing fair housing concern. In a 2021 study conducted nationally by the National Bureau of Economic Research sought to report on discriminatory behavior in the rental housing market.

Using more than 25,000 interactions with rental property managers across the 50 largest U.S. cities, the study revealed that African American and Hispanic/ Latinx renters face discriminatory constraints in the majority of U.S. cities. According to

the study, “Inquiries from white renters received responses 60% of the time, while inquiries from African American and Hispanic/Latinx renters had lower average response rates at 54.4% and 57.2%, respectively. Results varied by census region and metropolitan area. Compared to inquiries from white renters, response rates for inquiries from African American renters were 12% lower in the Midwest and Northeast, 7.9% lower in the West, and 7.6% lower in the South. Response rates were 8.1% lower in the Northeast, 5.2% lower in the South, 3.6% lower in the Midwest, and 2.6% lower in the West for Hispanics compared to whites. African Americans faced the greatest discrimination in Chicago, IL, Los Angeles, CA, and Louisville, KY, while Hispanics faced the greatest discrimination in Louisville, KY, Houston, TX, and Providence, RI.”

By responding to online rental listings using names associated with a particular racial/ethnic group, researchers concluded that, overall, African Americans and Hispanic/LatinX renters continued to experience discrimination in the rental housing market.

(Source: Peter Christensen, Ignacio Sarmiento-Barbieri, and Christopher Timmins. November 2021. “RACIAL DISCRIMINATION AND HOUSING OUTCOMES IN THE UNITED STATES RENTAL MARKET” https://www.nber.org/system/files/working_papers/w29516/w29516.pdf)

5. Viewing of Units

Viewing the unit is the most obvious place where the potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, or judge on appearance whether a potential renter is reliable or may violate any of the rules. In a 2011 study titled, “Subtle Discrimination in the Rental Housing Market: Evidence from E-mail Correspondence with Landlords,” researchers developed an experiment to test for subtle discrimination. Subtle discrimination is defined as unequal treatment between groups that occurs but is difficult to quantify and may not always be identifiable through common measures such as price differences. Researchers found that, in general, landlords replied faster and with longer messages to inquiries made from white names. The study also found that landlords were more likely to use descriptive language, extend invitations to view a unit, invite further correspondence, use polite language, and make a formal greeting when replying to e-mail inquiries from a white home seeker.

(Source: Hanson, Andrew, Zackary Hawley, and Aryn Taylor. September 2011. " Subtle Discrimination in the Rental Housing Market: Evidence from E-mail Correspondence with Landlords.")

6. Credit/Income Check

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history/salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent. Many landlords often use credit history as an excuse when trying to exclude certain groups. Legislation provides for applicants to receive a copy of the report used to evaluate

applications. The California State legislature recently passed a bill limiting the ability of landlords from using credit history of a government assisted (typically Section 8) applicant, instead allowing applicants to provide verifiable alternative evidence of their ability to pay rent. This new law will hopefully lessen the barrier that credit scores have historically had against low-income renters.

The City was unable to find any significant evidence of discrimination in using language related to fees, asking for employment or rental history, or requesting background information. Further education of landlords is needed for the new protections for assisted tenants.

J. Office of Fair Housing and Equal Opportunity (FHEO)

Housing discrimination complaints can be filed directly with HUD. In California, the housing discrimination complaints are processed by HUD's San Francisco Office of Fair Housing and Equal Opportunity (FHEO).

1. Secretary-Initiated Complaints

According to HUD, it –

...files a secretary-initiated complaint when a preliminary investigation has found evidence that a systemic discriminatory housing practice has occurred or is about to occur, though an aggrieved person may or may not have come forward. HUD may also file a secretary-initiated complaint when it has received an individual complaint but believes that there may be additional victims of the discriminatory actions or wants to obtain broader relief in the public interest.

During Federal Fiscal Year (FFY) 2022, HUD filed one (1) Secretary-initiated complaint based on Sex, Disability, and Familial Status which did not involve the City of Torrance.

2. Compliance Reviews of Recipients of HUD Funds

According to the Office of Fair Housing and Equal Opportunity Annual Report to Congress FY 2017:

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

After a review to assess whether the recipient of HUD funds has complied with civil rights laws, HUD issues written findings of its review. Typically, HUD issues a Letter of Findings to the recipient. A Letter of Findings contains the findings of fact and any findings of noncompliance, along with a description of an appropriate remedy.

The City of Torrance was not subject to any HUD compliance reviews during the last five years.

K. Fair Housing Discrimination Suit Filed by the Department of Justice or Private Plaintiffs

According to the Office of Fair Housing and Equal Opportunity Annual Report to Congress FY 2022: the Housing and Civil Enforcement Section obtained 15 final outcomes in Fair Housing Act election referrals from HUD.

There have been no cases filed by the DOJ in the last five years that involve a Torrance party. In addition, the DOJ can file suits against entitlement jurisdictions alleging housing discrimination and/or the failure to affirmatively further fair housing. The DOJ has not filed such a suit against Torrance as the City has been in compliance with HUD's fair housing requirements.

Private parties also can file a fair housing lawsuit against the City. Private plaintiffs have not filed such a suit against Torrance.

On June 21, 2022, the DOJ announced a settlement with Meta Platforms Inc, regarding discriminatory housing in violation of the Fair Housing Act. Per the DOJ, "The proposed agreement resolves a lawsuit filed today in the U.S. District Court for the Southern District of New York alleging that Meta's housing advertising system discriminates against Facebook users based on their race, color, religion, sex, disability, familial status and national origin...Among other things, the complaint alleges that Meta uses algorithms in determining which Facebook users receive housing ads, and that those algorithms rely, in part, on characteristics protected under the FHA (DOJ):

- Meta enabled and encouraged advertisers to target their housing ads by relying on race, color, religion, sex, disability, familial status and national origin to decide which Facebook users will be eligible and ineligible to receive housing ads.
- Meta created an ad targeting tool known as "Lookalike Audience" or "Special Ad Audience." The tool uses a machine-learning algorithm to find Facebook users who share similarities with groups of individuals selected by an advertiser using several options provided by Facebook. Facebook has allowed its algorithm to consider FHA-protected characteristics — including race, religion and sex — in finding Facebook users who "look like" the advertiser's source audience and thus are eligible to receive housing ads.
- Meta's ad delivery system uses machine-learning algorithms that rely in part on FHA-protected characteristics — such as race, national origin and sex — to help determine which subset of an advertiser's targeted audience will actually receive a housing ad."

The settlement agreement retains that Meta Inc. cease using practices that include discriminatory algorithms. With the increased use of Alternative Intelligence (AI), there may be increased use of technology in relation to Housing and thus potential for fair housing issues as a result.

L. Housing Rights Center (HRC)

The City contracts with the Housing Rights Center, a non-profit organization, for housing counseling services. Previously, the City was part of the Los Angeles Urban County and received HRC services through that contract. Starting in FY 2024-25, Torrance began directly contracting with the HRC. HRC provides a Fair Housing Program that complies with the HUD requirement to Affirmatively Further Fair Housing, which includes:

- Fair Housing discrimination complaint intake, instigations, and resolutions;
- Education and outreach activities conducted in the City of Torrance;
- Landlord and tenant counseling, mediation, and assistance; and
- Activities to affirmatively further fair housing.

During FY 2023-24, 34 housing discrimination inquiries were filed with the Housing Rights Center from residents of Torrance. The most frequent bases for the inquiries were:

- Physical Disability 52.94%
- Mental Disability 11.76%
- Race 5.88%
- Familial Status 5.88%
- Source of Income 5.88%

In FY 2023-24, there were a total of 4 discrimination cases filed with the HRC by Torrance residents. Two out of the four (50%) were in regard to disability-physical, one was disability-mental (25%), and one was familial status (25%).

During this same period, HRC performed 156 Landlord/Tenant services. The majority of the inquiries were regarding notices, repairs, rent increases, and substandard conditions. Overall, HRC resolved 33.97% of the complaints successfully and referred another 18.59% to legal aid.

Of the 194 total HRC Torrance inquiries in 2023-24 (discrimination and general housing landlord/tenant services), 86.08% of inquiries were made by extremely low-income individuals. This indicates that extremely low-income households are more likely to use housing rights services in Torrance. The most common racial category of inquiries was “Other” at 67.53%. Additionally, the highest percentage of ethnicity was “Not Hispanic/Latino” at 80.41%.

M. Senior Services

The Los Angeles County Workforce Development Aging & Community Services (WDACS) offers a wide variety of adult services including care locator services, nutrition, health insurance counseling, needed wrap-around services, long-term care programs, and transportation assistance.

The County Senior Services Department provides investigative services on abuse claims against seniors and disabled populations. The County District Attorney’s Office fights for elder abuse and improving the quality of life for seniors. The County was

the first to establish the first local prosecutor's office in the country to create an Elder Abuse Section with staff trained and dedicated to prosecuting crimes against the elderly.

The County offers several programs that directly benefit seniors, which are listed below.

- General Relief (GR) provides financial assistance to indigent senior adults who are ineligible for federal and state programs.
- Health care programs are offered by the county to seniors regardless of their race or immigration status.
- Restaurant Meals Program allows homeless, disabled, and elderly individuals and their spouse to receive benefits to use their Golden State Advantage (EBT) cards to purchase meals from participating restaurants.
- In- Home Supportive Services (IHSS) helps pay for services provided to low-income elderly, blind or disabled individuals so that they can remain safely in their own home.
- Cash Assistance Program for Immigrants (CAPI) provides cash assistance to certain aged, blind, and disabled legal non- citizens ineligible for certain programs and services due to their immigration status.
- Supplemental Security Income Medi-Cal Advocacy Program (SSIMAP) provides physically and mentally disabled GR and SSI recipients with medical and mental health services.

The City of Torrance Community Services Department provides many activities and programs offered citywide at the three senior centers. Activities and programs range from arts and cultural experiences, dance, fitness, enrichment, health and social services, nutrition, excursions, drop-in, and special events. Additionally, the Focal Point on Aging is an information and referral program where older adults, caregivers, and their families can obtain ready access to a full range of available services including: transportation, housing, Meals-On-Wheels, health care, companion care, Medicare, social and legal services, HMOs, and more.

N. Hate Crimes

The term "hate" can be misleading. When used in a hate crime law, the word "hate" does not mean rage, anger, or general dislike. At the federal level, hate crime laws include crimes committed on the basis of the victim's perceived or actual race, color, religion, national origin, sexual orientation, gender, gender identity, or disability.

California law defines a hate crime as a criminal act or credible threat of violence against a person or group of people in which the victims are targeted because of their actual or perceived race, color, religion, ancestry, national origin, sexual orientation, gender or disability. Hate crimes cause victims and the targeted community to live in fear and tend to undermine the foundations of equal justice in our society. To charge an offender with a hate crime under California law, there must be evidence that bias, hatred or prejudice was a substantial factor in the commission of the crime.

The following acts are examples of hate crimes under California law if the victim fits one of the legally protected categories:

- Targeting a victim for any crime, including property crimes such as burglary or vandalism, because of his/ her race, color, religion, ancestry, national origin, sexual orientation, gender or disability;
- Using force or threatening to use force to injure, intimidate or interfere with a person' s exercise of constitutionally guaranteed rights and freedoms such as attending church or school, voting, moving freely in public places or being secure in one' s home;
- Defacing or damaging property to intimidate or interfere with a person' s exercise of constitutionally guaranteed rights and freedoms;
- Desecrating a religious symbol or displaying a swastika on another person' s property with the intent to terrorize;
- Vandalizing, burning or bombing a church, synagogue, mosque or other house of worship with the intent to terrorize; and
- Hanging a noose on another person's property, knowing it to be a symbol representing a threat to life and for the purpose of terrorizing the owner of the property including schools, parks and places of employment.

California has a number of laws that specifically apply to hate crimes. These offenses may be prosecuted either as misdemeanors or felonies depending on the severity of the act. Some crimes that are typically prosecuted as misdemeanors can be elevated to felonies if they are hate- motivated. Convictions for felony crimes where hate was a substantial motivating factor can carry penalty provisions that add one to four years to the standard state prison sentence.

The City of Torrance Police Department has adopted the following Hate Crime Policy:

It is the policy of this department to safeguard the rights of all individuals irrespective of their disability, gender, nationality, race or ethnicity, religion, sexual orientation, and/or association with a person or group with one or more of these actual or perceived characteristics. Any acts or threats of violence, property damage, harassment, intimidation, or other crimes motivated by hate or bias should be viewed very seriously and given high priority. This department will employ reasonably available resources and vigorous law enforcement action to identify and arrest hate crime perpetrators. Also, recognizing the particular fears and distress typically suffered by victims, the potential for reprisal and escalation of violence, and the far-reaching negative consequences of these crimes on the community, this department should take all reasonable steps to attend to the security and related concerns of the immediate victims and their families as feasible. All officers are required to be familiar with the policy and use reasonable diligence to carry out the policy unless directed by the Chief of Police or other command-level officer to whom the Chief of Police formally delegates this responsibility

The City operates a text alert system “Torrance Alerts” whereby residents can get up-to-date information on emergencies and important City announcements. As shown in Table 26, there were 9 hate crimes in Torrance in calendar year 2023.

**Table 26
Hate Crimes 2023**

Year	Number of Hate Crimes
January 2023	1
February 2023	0
March 2023	0
April 2023	0
May 2023	0
June 2023	2
July 2023	1
August 2023	1
September 2023	0
October 2023	1
November 2023	2
December 2023	1
Total	9

Source: Torrance Police Department

O. Reasons For Any Trends or Patterns

In Torrance, physical disability and mental disability are likely to continue to be the most frequent basis for housing discrimination complaints in Torrance. This trend is supported by the housing discrimination complaints experienced overall in California and the nation. According to the National Fair Housing Alliance 2023 Fair Housing Trends Report, disability complaints remain the greatest percentage of all complaints followed by race. The report states that sex-based discrimination complaints in 2022 were the highest reported since 2005, when the data began being collected. Additionally, in 2022, there was an uptick in the “other” category of complaints, with significant increases in complaints regarding source of income and domestic violence. The State of California recognizes source of income as a type of housing discrimination.

Another trend identified by the report is increased fair lending enforcement. “Real estate sales complaints compromised 2.78 percent of all housing discrimination cases reported in 2022, with 917 total complaints. This number represents a decrease of 491 complaints from 2021 when 1,408 sales complaints were reported. This decrease may be a function of the broader slowdown of the real estate sales market resulting from limited housing supply and a dramatic increase in mortgage interest rates. New and existing home sales declined in 2022, with monthly decreases ranging from 2 percent to 39 percent over the course of the year, and sales volume declined as well. In 2022, there were 365 complaints of lending discrimination, a decrease from 2021 but a marked increase from previous years. Private fair housing organizations reported 50.14 percent of these complaints. Across all agencies in 2021, there were 395 lending complaints, in 2020 there were 238 complaints, and in 2019 there were 234 complaints” (National Fair Housing Alliance.

August 2023. “2023 Fair Housing Trend Report: Advancing a Blueprint for Equity.”)

P. Fair Housing Indicators from Housing Element 2021-2029

The following analysis is from the City’s housing element. The following conclusions were determined regarding potential fair housing concerns and indicators of certain disadvantaged populations:

- The highest resource areas (environment, education, income, etc.) are in the western portion of the City, while the high resource areas are located on the eastern side of the City, which is also identified as having a higher percentage of LMI population. The only moderate resource area in the City is located on the north border in the central part of the City. The City’s distribution of resource areas is consistent with cities in areas surrounded by the ocean, hillside, and urban communities.
- Overall, Asian, Pacific Islander, and Hispanic households experience a disproportionately higher percent of housing problems when compared to all other races/ethnicities within the City and may be underserved and in need of additional affordable housing opportunities.
 - The southwestern portion of the City that experiences high resources and greater incomes, contains a sizable gap of predominately White residents. Areas outside of the southwestern portion of the City contains a sizable gap of predominately minority concentrations.
 - Seniors experience a disproportionate percentage of housing problems compared to other family types within the City.

Overall, this analysis shows that the primary barrier to fair housing in Torrance is high housing cost, which has the effect of limiting access by lower-income households to the high opportunities and resources available in the City. The Housing Element found no evidence to suggest that discrimination against racial groups or persons with disabilities is a major issue.

CHAPTER 7 FAIR HOUSING IMPEDIMENTS AND ACTION PLAN

A. Potential Impediment(s) - Public Sector Actions

1. Amend the Zoning Code for Special Needs Housing

Overall, there were four (4) impediments within the City's Zoning Code (large family day care) **that will be evaluated during the term of this AI.**

a. Residential Care Facilities (seven or more)

Potential Impediment: The City permits large residential care facilities serving more than six persons in all residential zones subject to approval of a large family day care permit. Although a ministerial permit, state law now requires large family day care to be treated the same as small family day care, allowed as a permitted use with no differentiation between it and any other permitted residential use.

Accomplishments Planned to Overcome Potential Impediments:

The Community Development Department will update the zoning code to ensure consistency with State law. The City will review its current uses and permit requirements to include and reflect a broader range of uses and to facilitate housing for persons with disabilities.

b. Emergency Shelters

Potential Impediment: Parking standards for emergency shelters

Accomplishments Planned to Overcome Potential Impediments: The Community Development Department will revise existing parking standards for shelters based solely on staffing level and maintain an emergency shelter ordinance consistent with state law.

C. Low Barrier Navigation Centers:

Potential Impediment: Lack of ordinance regarding low barrier navigation centers

Accomplishments Planned to Overcome Potential Impediments: The Community Development Department will revise the Zoning Code to allow Low Barrier Navigation Centers in areas zoned for mixed uses and nonresidential zones that permit multi-family uses.

d. Transitional and Supportive Housing:

Potential Impediment: The Torrance Land Use Code does not currently reference transitional housing or supportive housing directly.

Accomplishments Planned to Overcome Potential Impediments: The Community Development Department will amend the zoning code to explicitly allow transitional and supportive housing as a residential use to be permitted as similar uses in the same zone and to ensure compliance with AB 2162.

B. Potential Impediments - Private Sector Actions

1. Housing Discrimination Complaints Based on Disability Status or Source of Income

Potential Impediment:

Over the past year, the highest number of housing discrimination inquiries by Torrance residents have been based on disability at 64.7 percent. Additionally, 75% of the cases (3 out of 4) were for disability related housing discrimination. This indicates a need for more education of landlords on housing discrimination against people with disabilities. Additionally, the new State of California laws regarding protections for assisted tenants in the application process have not been widely publicized.

Accomplishments Planned to Overcome Potential Impediments:

- Highlighted disability discrimination and assisted tenant protections at Fair Housing Workshops in Torrance.
- Distributed fair housing educational materials to Torrance landlords related to the rights of assisted tenants.

2. Discriminatory Advertising

Potential Impediment: Discriminatory advertisements of for sale and/or rental of housing units that indicate any preference on the basis of race, color, religion, sex, disability, familial status or national origin. The analysis found a need for increased education regarding language about pet policies in rental units.

Accomplishments Planned to Overcome Potential Impediments:

The Housing Rights Center will monitor online advertising of for sale and rental housing units for fair housing violations on a quarterly basis. If illegal advertisements are found, the Housing Rights Center will contact the listing agent to discuss, educate, and, if necessary, take enforcement actions.

3. Expanding Affordable Housing Opportunities

Potential Impediment:

Housing affordability alone is not a fair housing issue. Fair housing concerns arise only when affordability interacts with any issues covered under Fair Housing Law. Furthermore, Black or African American (11.38%), Some Other Race (8.48%), Two or More Races (8.19%), and Hispanic or Latino of Any Race (7.43%) are

disproportionately impacted by lower and moderate incomes, and therefore have fewer housing options than other racial/ethnic groups.

Accomplishments Planned to Overcome Potential Impediments:

The City will work towards creating more housing and preserving housing options especially for person in various protected classes by carrying out activities that address the following objectives.

- Preserve the supply of existing affordable housing for low- and moderate-income households.
- Expand the supply of affordable housing for low- and moderate-income households.

The following actions will assist the City in expanding affordable housing opportunities for low- to moderate-income residents.

- Section 8 Rental Assistance - The City will continue to operate voucher programs through the City Public Housing Authority (PHA). This includes the housing choice voucher program (HCV), veteran's affairs supportive housing program (VASH), emergency housing voucher program (EHV), and stability voucher program (SV). The primary objective of this program is to assist low-income (0 to 50% of MFI) persons and households in making rents affordable. The City will consider applying for additional special purpose vouchers if/when they become available from HUD. Additionally, the City will implement HUD's new Small Area Fair Market Rent (SAFMR). The implementation of the SAFMRs will increase the payment standards in higher rent areas in Torrance, creating increased housing choice for assisted households into higher income zip codes.
- Affordable Housing Resources – The City will continue to identify and pursue other funding sources for the development of affordable housing.

C. Action Plan

The City is dedicated to eliminating discrimination in housing and promoting equal access to housing choices for everyone. As such, the City strives to make a significant impact in affirmatively furthering fair housing and eliminating impediments to fair housing choice by offering housing programs without impediments based on race, color, religion, sex, disability, familial status, or national origin. The City will continue to increase the awareness of the availability and benefits of City programs regarding housing choice and housing assistance through social media platforms targeted towards the community. This information is distributed to the community in a number of ways, including Facebook, Twitter, Instagram, and on the City's website. This continues to prove to be a positive impact on the community by ensuring that residents are aware of the different services provided by the City of Torrance.

In addition, the City will continue to contract with a Fair Housing Organization for the ongoing implementation of a Fair Housing Program within Torrance that provides comprehensive, extensive, and viable education and outreach programs. The goal of the Fair Housing Program is to educate tenants, landlords, owners, Realtors, and property

management companies on fair housing laws; and to promote media and consumer interest. In addition, the Fair Housing Organization will address housing discrimination claims; inform landlords and tenants of their rights and duties; assist tenants with habitability issues and evictions (among other tenancy-related problems); and offer referrals to other agencies when applicable.

The City has an ongoing commitment to preventing, reducing, and ultimately eliminating housing discrimination and other barriers related to equal opportunity in housing choice. It is the City's intent to follow a well-established plan to continue making a significant effort toward affirmatively furthering fair housing and eliminate impediments to fair housing choice that are within its authority during the next AI. The City anticipates updated the AI in combination with the Five-Year Consolidated Plan. The next update will be effective July 1, 2028.

Attachment A

2010 Census Definitions of Race

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

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

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

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

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

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

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

American Indian or Alaska Native. A person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment. This category includes people who indicate their race as “American Indian or Alaska Native” or report entries such as Navajo, Blackfeet, Inupiat, Yup’ik, or Central American Indian groups or South American Indian groups.

Respondents who identified themselves as “American Indian or Alaska Native” were asked to report their enrolled or principal tribe. Therefore, tribal data in tabulations reflect the written entries reported on the questionnaires. Some of the entries (for example, Metlakatla Indian Community and Umatilla) represent reservations or a confederation of tribes on a reservation.

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

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

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

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

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

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

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

Attachment B

2010 Census Definitions of Hispanic or Latino Origin

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

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

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

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

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

“NOTE: Please answer BOTH Question 8 about Hispanic origin and Question 9 about race. For this census, Hispanic origins are not races.”

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

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

(Source: 2010 Census Redistricting Data (Public Law 94-171) Summary File: Technical Documentation, Appendix B – Definitions of Subject Characteristics, January 2011.)

Attachment C Fair Housing Protected Classes

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

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

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

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

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

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

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

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

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

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

California's Fair Employment and Housing Act (FEHA) is the primary state law, which prohibits discrimination in the sale, rental, lease negotiation, or financing of housing. The FEHA has five additional protected classes: sexual orientation, marital status, ancestry, source of income and age.

Sexual Orientation: The FEHA defines this basis as heterosexuality, homosexuality, and bisexuality. Government Code Section 12926(q)

Marital Status: The applicable state regulation defines marital status as "(a)n individual's state of marriage, non-marriage, divorce or dissolution, separation, widowhood, annulment, or other marital status."

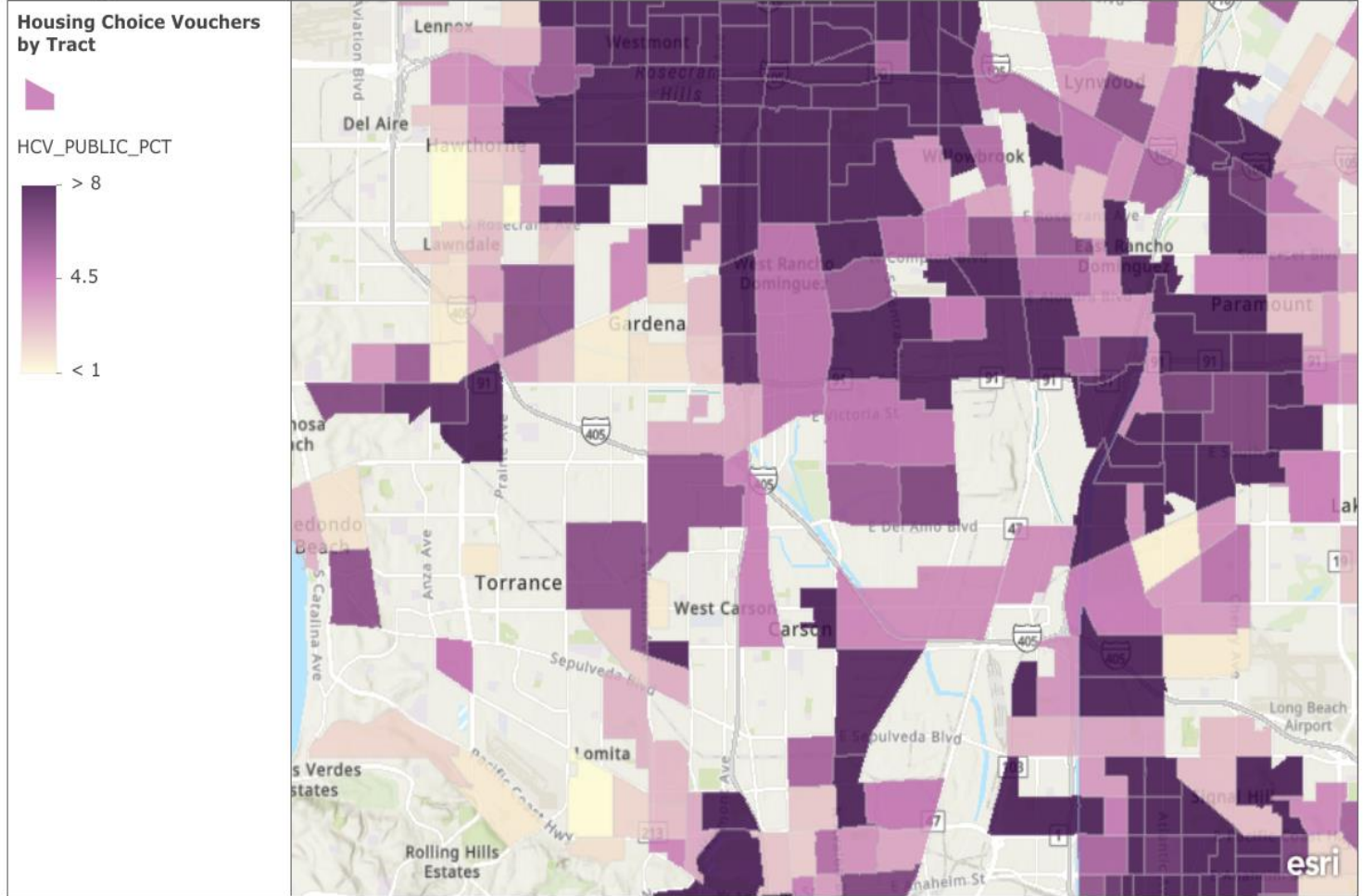
Source of Income: Source of income means lawful, verifiable income paid directly to tenant or paid to a representative of a tenant. A landlord is not considered a representative of a tenant. For purposes of the FEHA, it shall not constitute discrimination based on source of income to make a written or oral inquiry concerning the level or source of income.

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



Housing Choice Vouchers by Tract Map

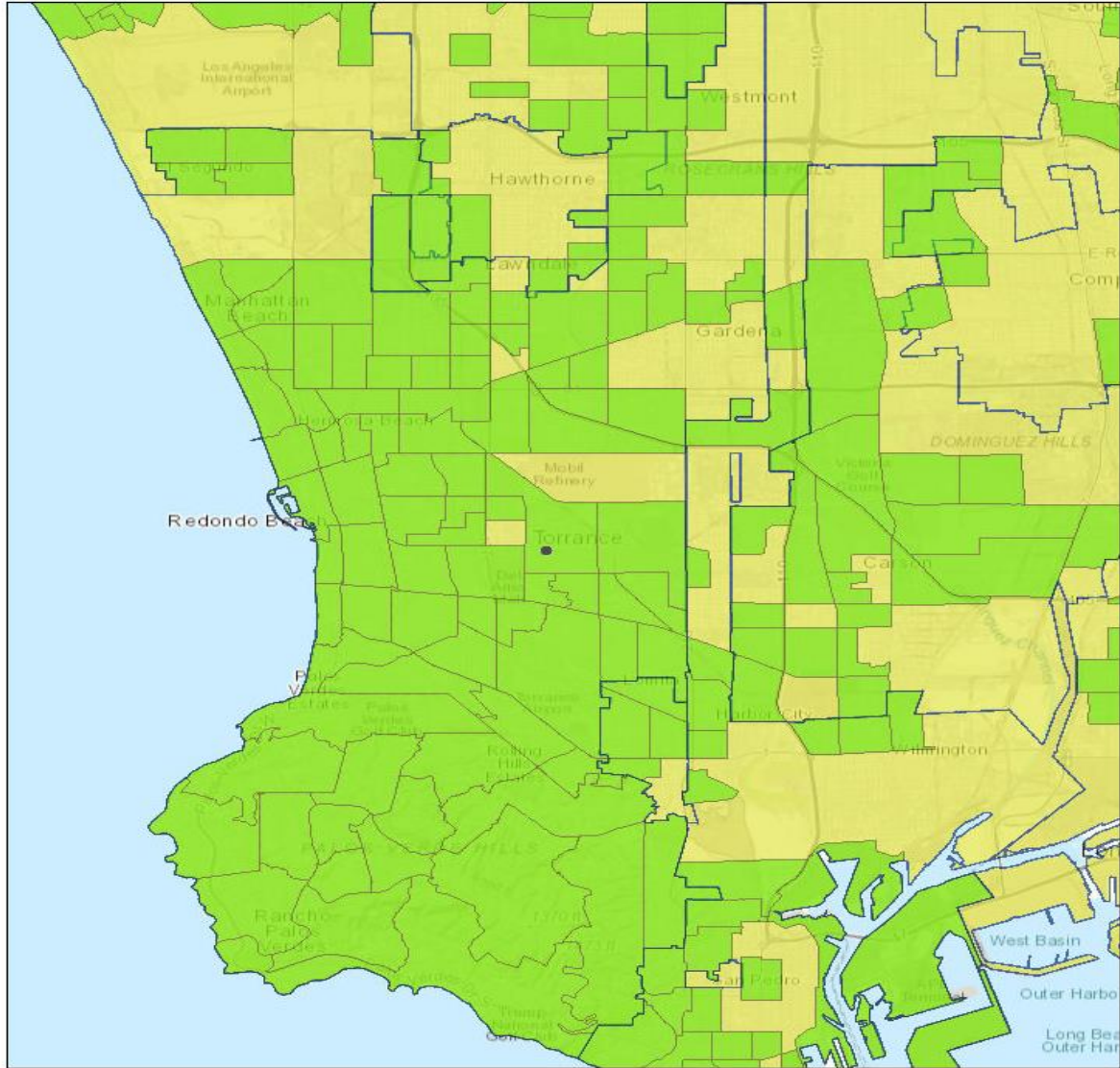
Housing Choice Vouchers by Tract



This service provides spatial data and information for Housing Choice Voucher (HCV) recipients aggregated to 2020 U.S. Census Tract geography. The HCV Program assists very low-income families, the elderly, and the disabled in obtaining decent, safe, and sanitary housing in the private market. Public Housing Authorities (PHAs) receive federal funds from HUD to administer the voucher program, and housing subsidies are paid to the landlord directly by the PHA on behalf of the participating family. The voucher recipient remains responsible for paying any difference that exists between the actual rent charged by the landlord and the amount subsidized by the program. Voucher recipients are responsible for finding a suitable housing unit where the owner agrees to rent under the program.

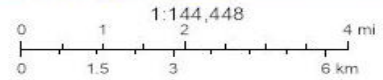


Opportunity Areas Map



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- Opportunity Neighborhoods
- Estimated Housing Authority Service Areas



City of Torrance, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS

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