



City of Lakewood Analysis of Impediments to Fair Housing Choice

June 10, 2025

City of Lakewood
5050 Clark Avenue
Lakewood, California 90712

City of Lakewood 2025-2029 Analysis of Impediments to Fair Housing Choice

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Executive Summary

Background

The Analysis of Impediments (AI) to Fair Housing Choice provides an overview of laws, regulations, conditions or other possible obstacles that may affect an individual or a household's access to housing in Lakewood. The AI presents a demographic profile of the community. It assesses the extent of housing needs among specific income groups, and evaluates the availability of a range of housing choices for residents. This report also contains an analysis of the conditions in the private market and the public sector that may limit the range of housing choices or impede a person's access to housing.

Incorporated in 1954, Lakewood experienced most of its population growth during the 1950s and 1960s. By 1970, Lakewood had approximately 83,000 residents. In 1990, the population had declined to approximately 73,500. In 2000, the population increased to 79,345 residents, and in 2020, Lakewood's population was estimated to be 79,676. Lakewood's population in 2023 is estimated to be 78,135.

The decrease in population during the 1970s was not accompanied by a decrease in housing units (single-family homes, apartments, condominiums, and mobile homes). The number of housing units has been slowly and consistently increasing over several decades due to new construction. The reduction in population was due instead to decreases in household size. Many of the young couples who moved to Lakewood in the 1940s, 50s and 60s to raise their families became one- or two-person households again as their children moved out of the home. This demographic transition is reflected in the changes in the City's average household size, which declined from 3.77 in 1960 to 3.03 in 2000, and subsequently rose to 3.10 in 2010 and has slightly risen to 3.11 in 2023. The subsequent population increase over the past two decades until 2010 has come from an increase in the number of persons per household as younger families again move into the City. The increase in the residential population is also due in part to the conversion of single-family properties in the M-F-R zone being redeveloped into multi-family residences and the state law requiring jurisdictions to allow the construction of Accessory Dwelling Units (ADU).

Along with this new growth, the ethnic and racial composition of the community has changed. Over the past decade, the percentage of White residents decreased while the proportion of Hispanic, Asian, and African American residents increased.

The City has been approaching build-out for several years. As a result, housing growth has been minimal compared to other jurisdictions with surplus land. The housing stock has increased by fewer than 4,000 units since 1970, with an increase of 278 units since 2000. Ownership housing in the City is affordable only to above moderate income households, while moderate income households can afford most rental units throughout the City.

Lending Issues

Though the City has become increasingly diverse since 1990, significant differences are present in the loan approval rates among the different racial and ethnic groups. Conventional home purchase loan approval rates for African American and Hispanic applicants are significantly lower than rates for White and Asian applicants. Similar patterns are also found in the approval rates of government assisted home purchase loans and all home improvement loans.

Loan approval rates in Census tracts with high minority concentration were similar to approval rates in tracts with low minority concentration. Therefore, minority concentration does not appear to be a factor in the loan approval rates of the Census tracts. Loan approval correlates most closely with Census tract income.

Fair Housing Issues

Lakewood has contracted with Fair Housing Consultants Inc. to provide fair housing services to City residents since 2002. Fair Housing Consultants, Inc. received five housing discrimination complaints during FY 2023-2024, pertaining to racial discrimination or based on familial status. Fair Housing Consultants referred all five cases to California Department of Fair Employment and Housing (DFEH) for further investigation after consulting with the clients.

Landlord/Tenant Disputes

During FY 2023-2024, Fair Housing Consultants Inc. responded to 192 complaints regarding various tenant/landlord disputes. The most common complaint was repairs and substandard problems, followed closely by rent increases. Other complaints pertained to security deposits, and evictions. Section 5 contains discussion and tables on this topic.

Recommendations and Actions

This AI proposes several recommendations and actions for the City of Lakewood, lending institutions, and service agencies to address these fair housing concerns. The actions are identified below:

A. Expanding Affordable Housing Opportunities

The availability of affordable housing is not a Fair Housing issue. Fair Housing concerns arise only when affordability interacts with any issues regulated under Fair Housing Law. Furthermore, Hispanic and African American households are disproportionately impacted by lower and moderate incomes and, therefore, have fewer housing options than other racial/ethnic groups. The following actions will continue to assist the City in expanding affordable housing opportunities for City residents.

1. Homeownership Assistance

Action 1.1: The City will continue to provide and expand home ownership opportunities for low and moderate-income households. Specifically, the City has partnered with an affordable housing developer to construct 37 for-sale townhomes to low-income families.

Time Frame: 4 years

Additionally, the City will explore the use of different funding programs to assist households with income between 30 and 80 percent of County Median Family Income (MFI), as such funding sources become available. This group has the most difficulty in obtaining conventional home purchase financing. The City will continue to refer interested residents to California Housing Finance Agency (CalHFA).

Time Frame: Ongoing

2. Rehabilitation Assistance

Action 2.1: The City will continue to provide and expand assistance for low-income households in meeting housing rehabilitation needs. Specifically, the City will explore the use of different funding programs to assist households with income between 30 and 80 percent of County MFI. This group has the most difficulty in obtaining conventional home improvement financing. Rehabilitation assistance is also accomplished using the City's Home Improvement Loan, Accessible Modification and Fix-Up, Paint-Up Grant programs.

Time Frame: Ongoing

3. Section 8 Rental Assistance

Action 3.1: In July 2011, the City voluntarily transferred its budget authority and baseline units from the Lakewood Housing Authority (LHA) to the Housing Authority of the County of Los Angeles (HACoLA) for administration of the program.

Time Frame: Completed

Action 3.2: Currently, the City continues to provide contact information for, and refers the elderly, large families and low-income families to, HACoLA for participation in the Section 8 program.

Time Frame: Ongoing

4. Affordable Housing Resources

Action 4.1: The City will identify and pursue other funding sources for the development of affordable housing.

Time Frame: At least once a year, assess the feasibility of applying to different funding programs.

B. Public Policies and Programs Affecting Housing Development

The City has identified several public policies and programs that have the potential to restrict equal access to housing. However, many City programs, including programs contained in the General Plan Housing Element, contain actions that actively promote equal access to housing. As a City committed to ensuring Fair Housing Choices for all residents, Lakewood has identified the following actions:

5. Incentives for Affordable Housing Development

Action 5.1: The City will continue to provide financial and development incentives to owners or developers of multi-family housing to set aside units that are affordable to low and moderate income residents as such opportunities become available.

Time Frame: Ongoing

Action 5.2: The City has adopted an Accessory Dwelling Unit Ordinance complying with California State Law to allow the construction and occupancy of up to two additional units intended for affordable housing on Single-Family Residential zone property.

Time Frame: Ongoing

6. Housing Element

Action 6.1: The City will continue to implement the policies and program identified in the certified Housing Element.

Time Frame: Lakewood's Housing Element was adopted on September 16, 2022 and implementation will be ongoing until the 2030 update.

C. Access to Financing

The analysis of lending data revealed that there are some differences that exist in the approval rates of loans by the race of the applicant. The City will take the following actions to improve access to financing for residents.

7. Outreach to Lenders

Action 7.1: The City will contact local lenders with homebuyer assistance programs to explore ways to expand participation by potential homebuyers.

Time Frame: Ongoing

Action 7.2: The City will work with local lenders and government institutions, such as California Housing Finance Agency, to provide information about government-backed financing for low and moderate income residents. The City will encourage local lenders to provide information in both English and Spanish.

Time Frame: Ongoing

8. Education and Resources

Action 8.1: The City will encourage workshops to be held in Lakewood by local lending institutions and Housing Rights Center regarding the home loan process and the resources available to low and moderate income homebuyers. The City will refer homebuyers and realtors to designated lenders. The City will encourage local lenders and Housing Rights Center to hold workshops in both English and Spanish.

Time Frame: Ongoing

Action 8.2: The City will provide brochures or information on homeownership, rental assistance, and rehabilitation assistance programs in English and Spanish.

Time Frame: Ongoing

9. Unfair Lending Practices

Action 9.1: The City will work with Housing Rights Center to monitor complaints regarding unfair lending and assess lending patterns using the Home Mortgage Disclosure Act (HMDA) and other data sources.

Time Frame: Ongoing

Action 9.2: The City and Housing Rights Center will participate with HUD and other agencies in investigating predatory lending in the home purchase, home improvement, and mortgage refinancing markets.

Time Frame: Ongoing

Action 9.3: Periodically, the City will use *Lakewood Living*, the City newsletter, or other media to alert residents of predatory lending practices, or other unfair lending practices that surface in the City.

Time Frame: Ongoing

Public Outreach

10. Fair Housing Services

Action 10.1: The City will continue to distribute information regarding the services provided by Housing Rights Center. The City will provide a description of the services on the City website.

Time Frame: Ongoing

Action 10.2: Housing Rights Center will conduct fair housing workshops for residents, real estate professionals, apartment owners, and property managers. Specific efforts should be made to expand community participation in these workshops, including a greater awareness among property owners and managers.

Time Frame: Ongoing

Action 10.3: Housing Rights Center will work with the local boards of realtors to distribute fair housing information to member agencies in Lakewood.

Time Frame: Ongoing

Chapter 1

Introduction

Over the past three decades, Lakewood experienced significant changes in its demographic profile, evolving from a primarily White community to one with more than one half of its population comprised of minority persons. Along with the demographic shifts have been changes in the housing market. In recent years, the housing market has experienced a downturn, resulting in lower housing values; however, home prices are still higher than the recessionary period of the early 1990s. Generally, limited housing stock and the uncertain housing market, particularly in the rental housing market, may raise fair housing concerns.

Federal Fair Housing laws prohibit discrimination in the sale, rental, lease, or negotiation of real property based on race, color, religion, sex, national origin, familial status, and disability. California Fair Housing laws are built upon the federal laws and add marital status, ancestry, and “any arbitrary discrimination” as the protected categories under the laws.

To affirmatively promote equal housing opportunity, a community must strive to remove impediments in the private and public sectors that may work to impede fair housing choice. Impediments to fair housing choice are:

- *Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or*
- *Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, or any other arbitrary factor.*

1.1 Purpose of Report

This Analysis of Impediments (AI) to Fair Housing Choice provides an overview of laws, regulations, conditions or other possible obstacles that may affect an individual or a household’s access to housing in Lakewood. The AI involves:

- A review of Lakewood's laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws affect the location, availability, and accessibility of housing; and

- An assessment of conditions, both public and private, affecting fair housing choice.

The scope of analysis and the format used for this AI adhere to recommendations contained in the *Fair Housing Planning Guide* developed by the U.S. Department of Housing and Urban Development (HUD).

1.2 Organization of Report

This AI is divided into seven chapters:

1. ***Introduction*** defines “fair housing” and explains the purpose of the report.
2. ***Community Profile*** presents the demographic, housing, and income characteristics in Lakewood. It also presents major employers and identifies transportation access to job centers. Lastly, the relationships among these variables are discussed.
3. ***Mortgage Lending Practices*** analyzes private lending activities that may impede fair housing in Lakewood.
4. ***Public Policies*** evaluate City policies to determine if they impede Fair Housing Choice in Lakewood.
5. ***Assessment of Fair Housing Practices*** evaluates the fair housing services available to residents and identifies fair housing complaints and violations in the City.
6. ***Findings, Recommendations, and Actions*** provides conclusions and recommendations about fair housing in Lakewood.
7. ***Signature Page*** which includes the signature of the Chief Elected Official and a statement certifying that the AI represents Lakewood’s official conclusions regarding impediments to Fair Housing Choice and the actions necessary to address identified impediments.

1.3 Preparers of Report and Data Sources

This report was prepared by City of Lakewood Community Development Department staff and is funded by Community Development Block Grant (CDBG) administration funds.

The following data sources were used to complete this Analysis of Impediments to Fair Housing Choice. Sources of specific information are identified in the text, tables, and figures.

1990, 2000, 2010 and 2020 U.S. Census

- Local Profiles Report 2019, Profile of the City of Lakewood, Southern California Association of Governments (SCAG)
- 2012-2016 and 2018-2022 American Community Survey 5-Year Estimates
- 2020 and 2023 American Community Survey 1-Year Estimates
- California Department of Finance
- City of Lakewood Comprehensive General Plan, including the 2021-2029 Housing Element
- City of Lakewood Municipal Code
- Housing Authority of Los Angeles County, Section 8 data
- Home Mortgage Disclosure Act (HMDA) data regarding lending patterns
- Lending Patterns 2023
- Apartments.com
- Metropolitan Transportation Authority (MTA), Orange County Transportation Authority (OCTA) and Long Beach Transit (LBT) routes and schedules
- Interviews with Fair Housing service providers and other agencies
- Lakewood 2025-2029 Consolidated Plan
- 2012-2016 and 2017-2021 Comprehensive Housing Affordability Strategy (CHAS) Databook
- Federal Bureau of Investigation website: <https://www.fbi.gov/news/press-releases/fbi-releases-2023-crime-in-the-nation-statistics>

1.4 Public Participation

The preparation of this AI involved public outreach, participation, and incorporation of comments relative to meeting the fair housing needs of Lakewood. On January 27, 2025, a consultation workshop on the AI was conducted in the Executive Board Room located at The Centre at Sycamore Plaza in Lakewood. Public notice of the meeting was published in the *Press Telegram*, was posted in three public locations, and was published on the City's website (www.lakewoodcity.org). The meeting was attended by City staff and Fair Housing Consultants, Inc.

On April 3, 2025, the City held a community forum in conjunction with the Planning and Environment Commission to solicit input from service providers and residents. Public notice of the meeting was published in the *Press Telegram*, was posted in three public locations, and was published on the City's website (www.lakewoodcity.org). The meeting was attended by members of the City of Lakewood Planning and Environment Commission, City staff, and Fair Housing Consultants, Inc.

The Draft AI was made available for public review from January 27, 2025 through April 22, 2025. A public hearing was held before the City Council on June 10, 2025. Public notice of the meeting was published in the *Press Telegram*, was posted in three public

locations, and was published on the City's website. The meeting was attended by members of the City of Lakewood City Council, City staff, and Fair Housing Consultants, Inc. The Draft AI was published on the City's website for public review and comment.

Chapter 2

Community Profile

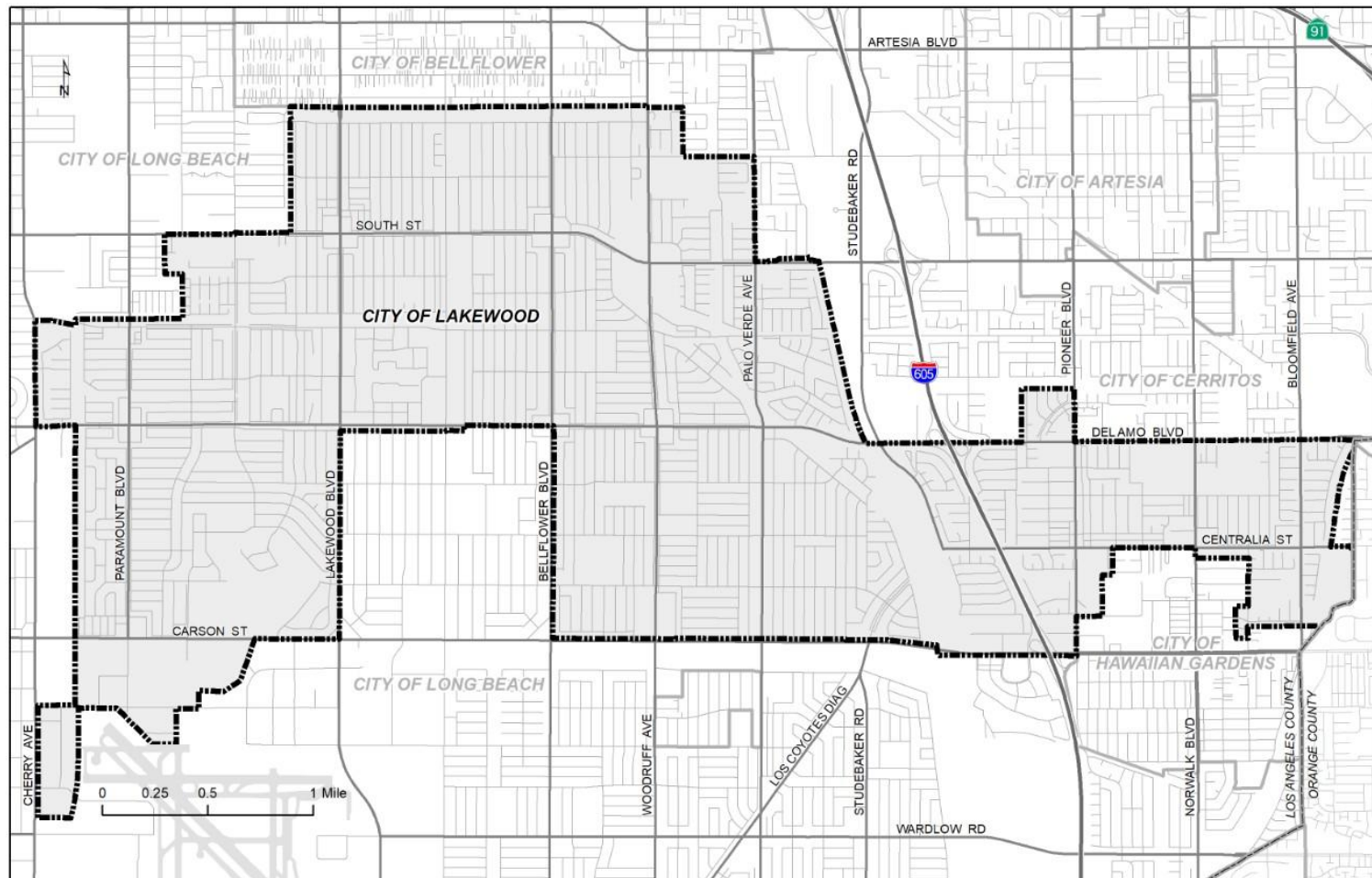
This chapter analyzes the demographic profile, income distribution, housing stock characteristics, and access to public transportation in Lakewood. The location of community facilities, such as group homes, in relation to low and moderate income areas is also analyzed. By assessing this information, 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 ability of households with similar income levels in the same housing market to have a like range of housing choice.

2.1 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.

Population Growth

Lakewood is an older, developed community located in southeast Los Angeles County (See Figure 2.1). Between 1960 and 2020, the population of Lakewood increased from 67,126 to 82,496 persons, representing an increase of 20.5 percent. Over this 60-year period, the population of the City had risen to 82,972 in 1970 and declined to 73,557 in 1990, and rebounded to an estimated 78,135 in 2022 (See Table 2-1).



LEGEND

- MAJOR STREET
- FREEWAY
- ▬ CITY BOUNDARY
- ▬ ADJACENT CITY BOUNDARY

SOURCES: 2010/2020 US
CENSUS TIGER; COUNTY OF
LOS ANGELES; CITY OF
LAKEWOOD

Figure 2.1
Lakewood and Adjacent Cities

Table 2-1: Population Trends

Year	Population	Percent Change
1960	67,126	-
1970	82,973	23.6%
1980	74,654	-10.0%
1990	73,557	-1.5%
2000	79,345	7.9%
2010	80,048	0.9%
2020	79,676	-0.3%
2023	78,135	-2.0%

Source: U.S. Census 1960-2010 and American Community Survey 1-Year Estimates 2020 and 2023

Table 2-2: Population Trends and Household Size

Year	Population	Housing Units	Household Size
1960	67,126	18,301	3.66
1970	82,973	24,208	3.42
1980	74,654	26,250	2.84
1990	73,557	26,795	2.75
2000	79,345	27,310	2.90
2010	80,048	27,470	2.91
2020	79,676	27,697	2.97
2023	78,135	27,767	2.81

Source: U.S. Census 1960-2010 and American Community Survey 1-Year Estimates 2020 and 2023

Household Size

Household size is the average number of persons occupying a dwelling unit. As a result of the changing demographics and the shift in the ethnic composition of the City and the County as a whole, household size has been increasing.

The decrease in population between 1970 and 1990 was attributed to a decrease in household size. Lakewood has been a relatively stable community where residents have essentially “aged in place”; families that moved to Lakewood in the 1950s and 1960s remained in the City. As the children in these families became adults and left home, the population of the City decreased. This is evidenced by the decrease in household size from 3.66 persons per household in 1960 to 2.75 persons per household in 1990. Since 1990, the household size increased from 2.75 in 1990 to 2.97 in 2020, which is still below the 1960 level. The increase in household size starting in 1990 is attributed to new families with children moving into the community, but some of those children became adults and left home.

Age Characteristics

The age characteristics of the population are important indicators of the type of housing needed in the community. For example, a younger population may indicate a high proportion of families with young children and, therefore, the need for larger homes. In contrast, a large elderly population may indicate a need for an increased number of senior housing units.

Table 2-3 shows the age characteristics for Lakewood residents. The table shows that the age characteristics changed only slightly between 1990 and 2023 but has had an increasing trend. Persons age 10 to 19, 20 to 44, and 45-64 account for a larger share of the total population. In the meantime, the proportion of persons age 20-44 and persons 9 and under decreased while the overall population slightly increased in 2010 then slightly decreased in 2023. This may be due to young child-less couples and individuals moving into Lakewood, an increase in households lacking a family relationship, or a combination of these factors.

Table 2-3: Age Distribution 1990-2023

Age Groups	1990	2000	2010	2020	2023
65 and over	8,879	9,414	9,086	11,052	9,887
45 to 64	14,379	17,003	21,776	21,702	21,657
20 to 44	30,250	29,007	27,297	28,031	27,050
10 to 19	9,317	11,766	12,045	9,472	10,259
9 and under	10,732	12,155	9,844	9,419	9,282
Total Persons:	73,557	79,345	80,048	79,676	78,135

Source: U.S. Census 1990, 2000, 2010 and American Community Survey 1-Year Estimates 2020 and 2023

Race and Ethnic Characteristics

The race and ethnic composition of a population influence fair housing issues to the extent that certain racial and ethnic groups may experience discrimination. These influences are due to factors such as race, ethnicity, language spoken, or other cultural factors.

Table 2-5, presents the racial and ethnic characteristics of Lakewood residents. As shown, the City has undergone significant changes in racial and ethnic composition since 1990. The proportion of White residents decreased from 72 percent in 1990, to less than 34 percent in 2023. During these same reporting periods, the proportion of Hispanic residents increased from 15 percent to 43 percent. In addition, the proportion of Asian residents increased from 9 percent to 16 percent, while the proportion of African American residents increased from 4 percent to 8 percent in 2020 then decreased to under 6 percent in 2023.

The increase in “Other” households is due in large part to the inclusion of persons of two or more races. The 2000 Census marked the first time that residents could declare more

than one race, and these persons were placed in the “Other” category for the purposes of this analysis.

Table 2-4: Race and Ethnicity

Race and Ethnicity	1990	2000	2010	2020	2023	2020-2023 % Change
White, Non-Hispanic	72.3%	45.1%	55.9%	47.6%	33.7%	-39.2%
African American	3.5%	7.3%	8.8%	8.4%	5.6%	-33.3%
American Indian	0.5%	0.6%	0.7%	0.6%	0.8%	33.3%
Asian	9.0%	13.4%	16.4%	19.0%	15.9%	-17.7%
Pacific Islander*	--	0.6%	0.9%	0.8%	0.2%	-16.3%
Other**	0.1%	10.1%	17.3%	23.6%	43.8%	85.6%
Hispanic/Latino (any race)	14.6%	22.8%	30.1%	34.1%	43.2%	26.6%
Total:	100%	100%	100%	100%	100%	--

Source: 1990, 2010, 2018 Census and American Community Survey 2023 1-year estimates

*Included in Asian race category in 1990

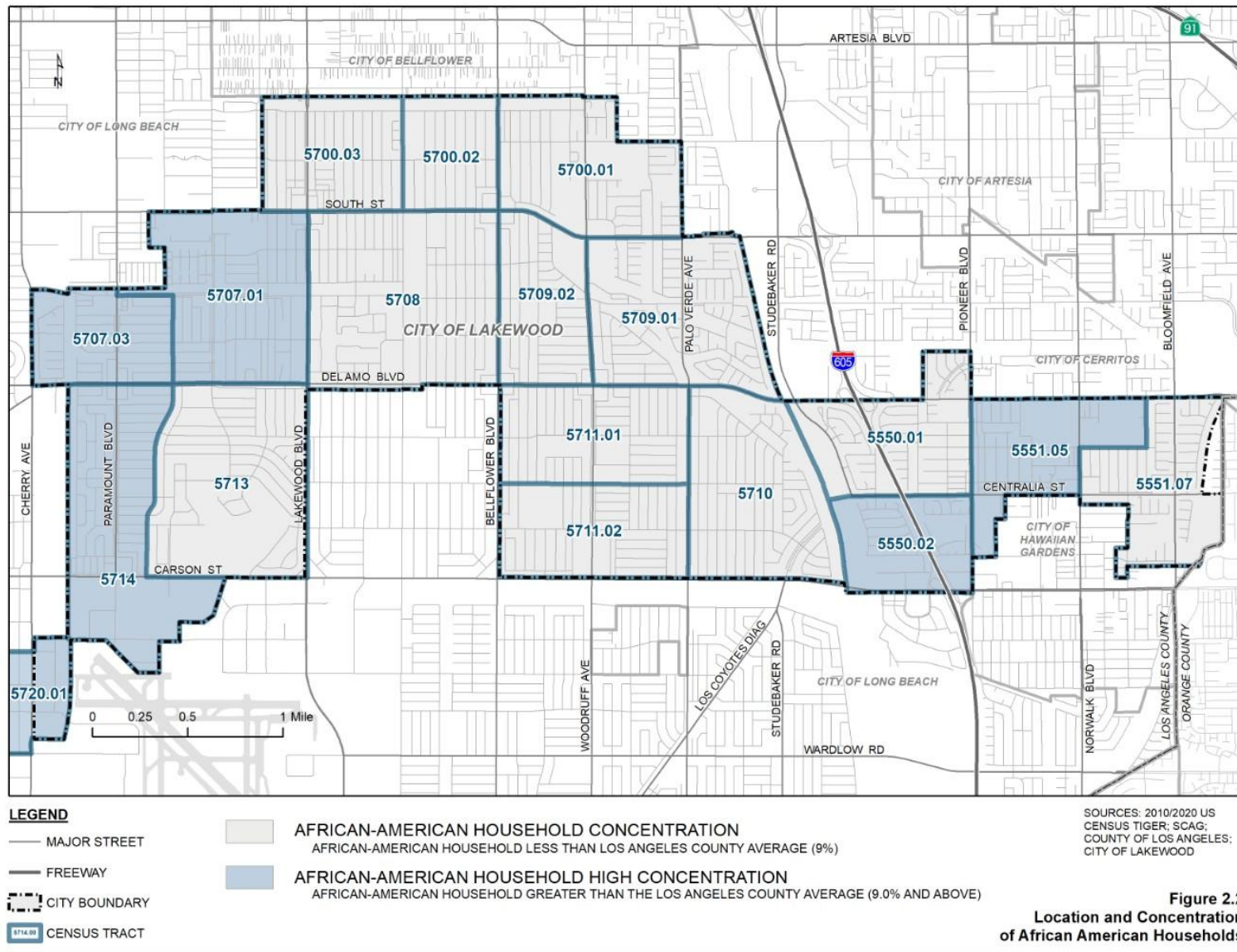
**Starting in 2000, included persons identifying as two or more races.

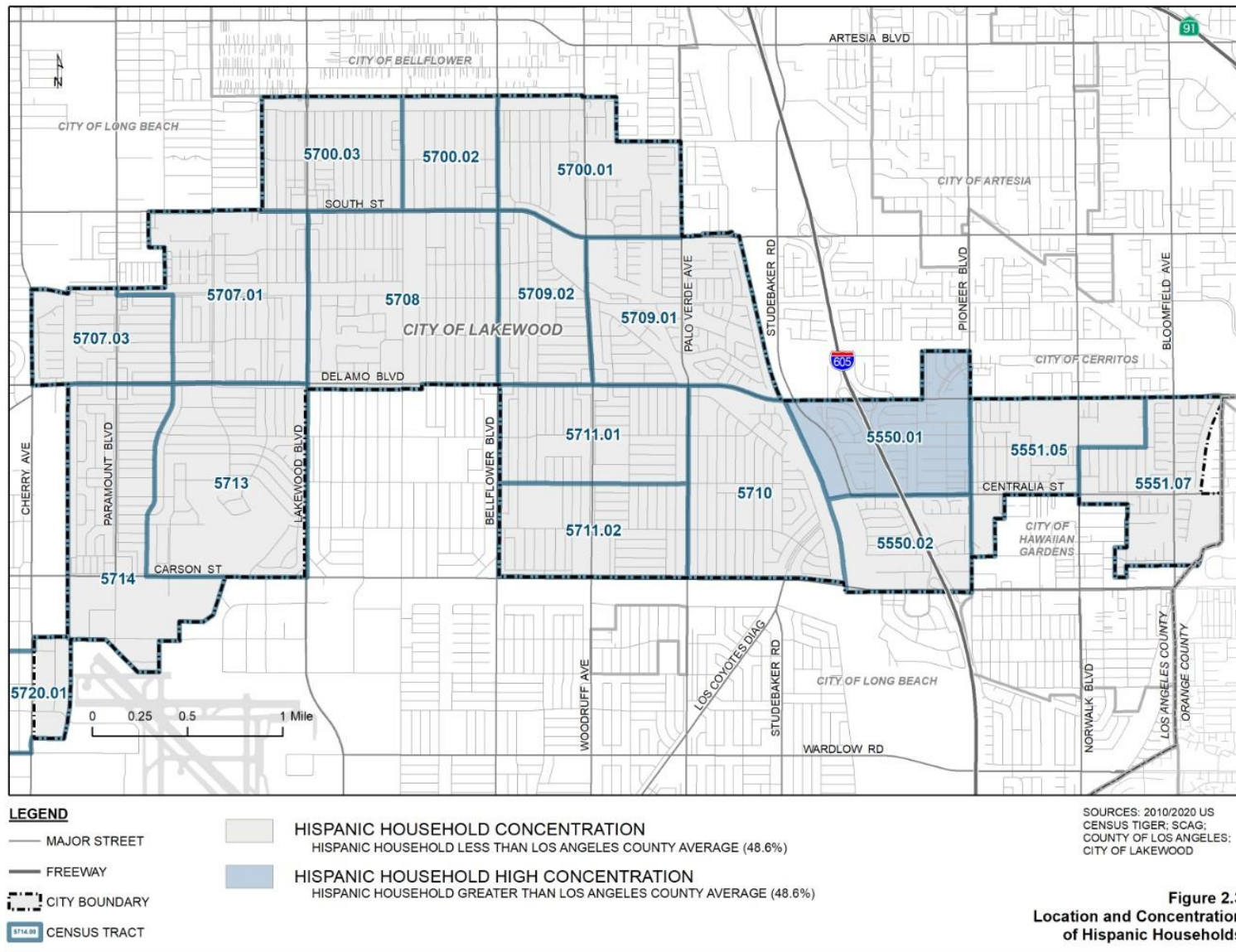
Racial and Ethnic Concentrations

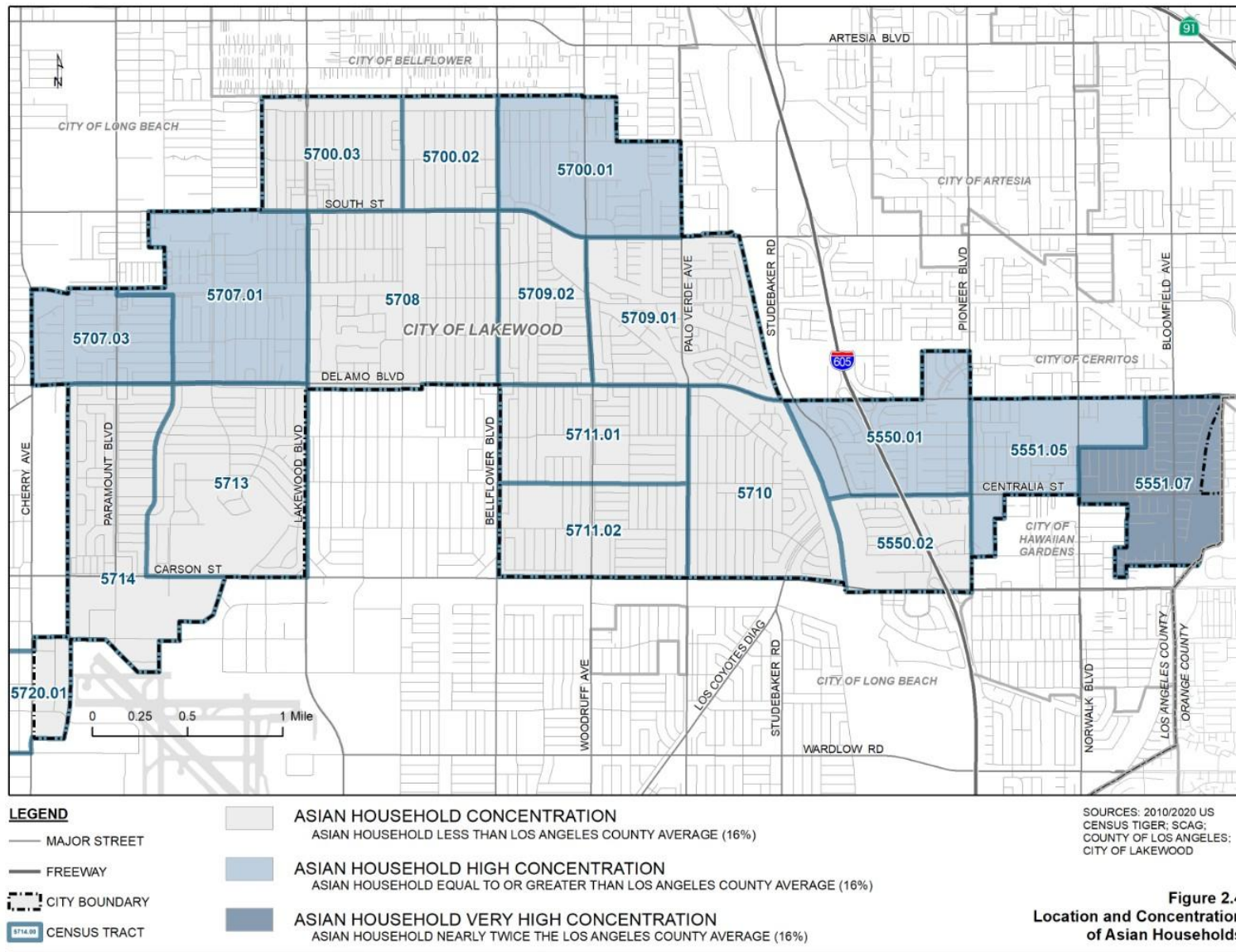
Figures 2.2, 2.3, 2.4 and 2.5 below illustrate the concentration of African American, Hispanic, Asian and Pacific Islander or Native Hawaiian households by U.S. Census Tracts and Blocks in the City. A concentration is defined as a greater proportion of total households than the County average, while a high concentration is defined as a proportion of more than twice the County average. The County averages for the racial or ethnic groups are as follows:

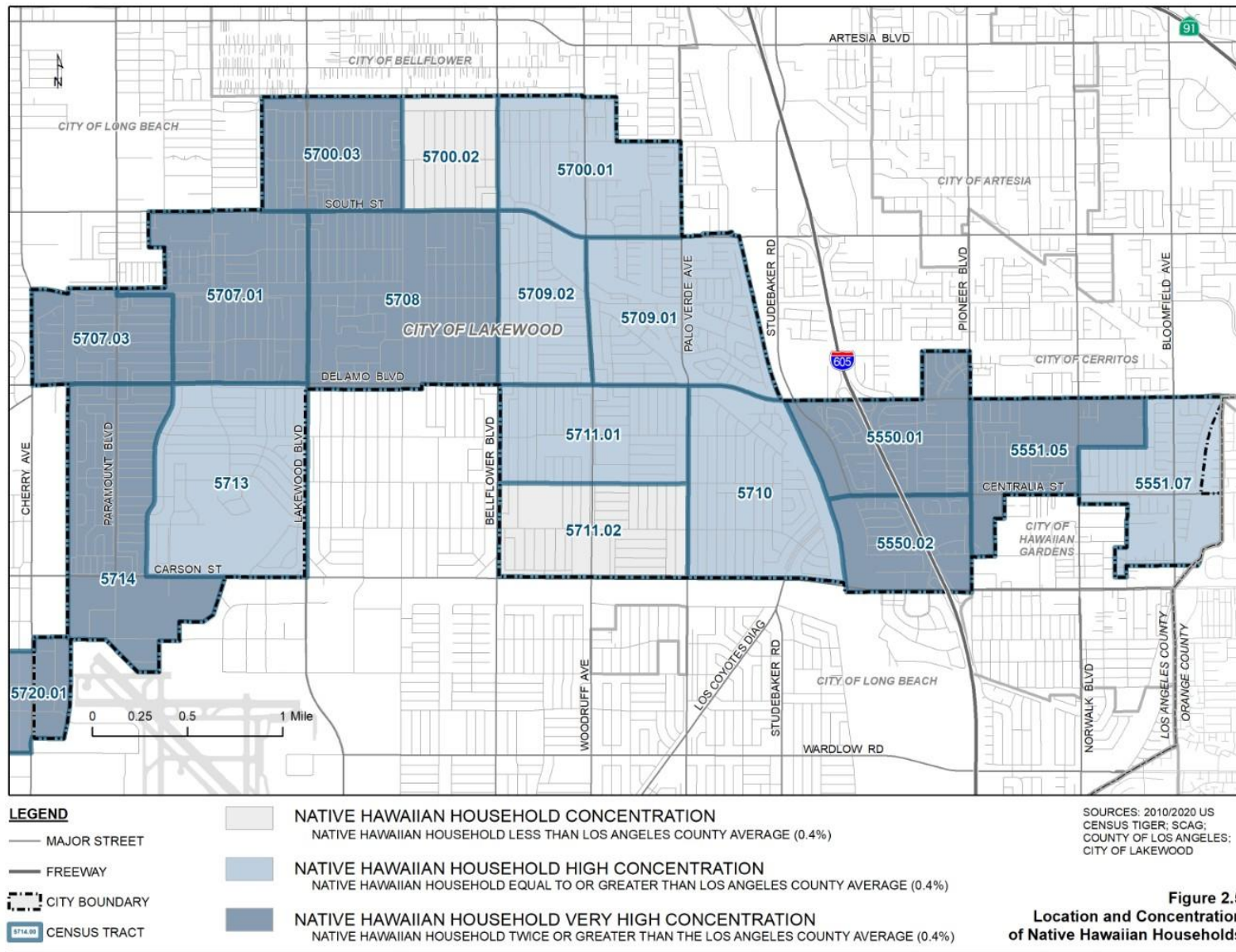
- Asian: 16%
- African American: 9%
- Hispanic or Latino (of any race) 48.6%
- Native Hawaiian: 0.4%

As the figures illustrate, most African American households are located in the eastern portion of the City near Cerritos and Hawaiian Gardens, as well as in the western portion of the City near Lakewood Center mall and the City of Long Beach. No high concentrations of African American households exist in the City. Hispanic households have concentrations in several blocks located in the eastern portion of Lakewood near Cerritos and Hawaiian Gardens. Several blocks have a high concentration of Asian households. These block groups are located in the eastern portion of the City, bordering Cerritos and Hawaiian Gardens, as well as two areas in the western portion of the City near Long Beach. Concentrations of Asian households are also located in the northern portion of the City bordering Bellflower. Concentrations and high concentrations of Native Hawaiian households are present throughout most census tracts of City of Lakewood.









2.2 Household Characteristics

Household type and size, income level, the presence of persons with special needs, along with other household characteristics may affect a household's access to housing. This section details the various household characteristics that may affect equal access to housing.

Household Composition and Size

According to Table 2-4 below, in 2000 there were 26,853 households in the City of Lakewood. In 2010, there were 26,543 households and in 2020 the number of households increased slightly to 27,319. In 2023 the City of Lakewood saw the lowest number of households in over 20 years with 25,033.

Table 2-5: Household Type Distribution

Household Type	2000		2010		2020		2023	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Families	20,550	76.5%	20,382	76.8%	20,966	81.0%	19,574	78.2%
Single Parents	4,950	18.4%	4,719	17.8%	4,693	18.0%	5,325	21.3%
Other	1,353	5.0%	1,442	5.4%	1,660	1.0%	134	0.5%
Total	26,853	100%	26,543	100%	27,319	100%	25,033	100%

Source: 2000 and 2010 U.S. Census; 2018-2022 American Community Survey 5-Year Estimates and 2023 American Community Survey 1-Year Estimates

Specific characteristics may affect individual household access to housing in the community. The following discussion highlights the characteristics that may affect access to housing in Lakewood.

Large Households

Large households are defined as households with five or more members. These households are usually families with two or more children, and/or with extended family members. Large households are a special needs group because the availability of adequately sized, affordable housing units is often limited. In order to save for basic necessities such as food, clothing, and medical care, low and moderate income large households typically reside in smaller units, resulting in overcrowding. Furthermore, families with children, especially those families who are renters, may face discrimination or differential treatment in the housing market. For example, landlords may charge such families a higher rent or security deposit than they normally would, limit the number of children in a complex, confine families to a specific location, or choose not to rent to families with children.

According to 2017 Local Profile, in 2016 there were 4,324 large households in the City which account for 17 percent of all households in the City. Whereas more current data from CHAS 2017-2021 Data, shows there were 3,355 large households in the City, which equated to approximately 13 percent of all households. Of these large households, 29.3 percent are occupied by renters, and 70.7 percent were owner occupied. While there is a slight decrease in the number of large households when comparing the data from 2016, many renter households may not be able to find adequately sized housing due to the limited number of large rental units, and may be more are likely to experience discrimination when trying to rent a smaller unit.

Single-Parent Households

The 2023 ACS 1-Year Estimates and 2020 ACS 5-Year Estimates reports an increase in the number of single-parent households between 2020 (4,963 or 18% of all households) and 2023 (5,325 or 21.3% of all households). The increase in single-parent households is a reflection of the City's slow population growth in the last decade. Single-income households pose a threat to single-parent households as many of these households are renters and may not be able to afford adequately sized housing. Further, adults and children in single-parent households are at a higher risk for adverse health effects, such as emotional and behavioral problems, compared to their peers. Children in such households are more likely to develop depression, smoke, and abuse alcohol and other substances. Consequently, these children experience increased risk of morbidity and mortality of all causes. Similarly, single parents suffer from lower perceived health and higher risk of mortality.

Persons with Disabilities

Lakewood is home to a number of people with disabilities that prevent employment, restrict mobility, or make self-care difficult. Disabilities are defined as mental, physical or health conditions that last over six months. Persons with disabilities may face discrimination in the housing market because of the need for wheelchairs, home modifications to improve accessibility, or other forms of assistance. More common examples of discrimination against persons with physical and/or other limitations include refusal to rent to a person in a wheelchair for fear a unit might be damaged. Discrimination may also occur by prohibiting service/guide animals of disabled applicants because of a no-pet policy. The 2023 ACS 1-Year Estimates state that 8,674 Lakewood residents live with a disability and have documented the following:

- 1,116 disabled persons aged 5 to 17 representing 7.9 percent of total population of persons aged 5 to 17
- 897 disabled persons aged 18 to 34 representing 5.5 percent of total population of persons aged 18 to 34
- 3,424 disabled persons aged 35 to 64 representing 10 percent of the total population of persons aged 35 to 64

- 1,157 disabled persons aged 65 to 74 representing 19.4 percent of the total population of persons aged 65 to 74.
- 2,078 disabled persons aged 75 and over representing 52.8 percent of total population of persons aged 75 and over.

The City offers many services to assist persons with disabilities, especially elderly persons. The City coordinates with Pathways Volunteer Hospice to provide in-home non-medical services to seniors with disabilities and Human Services, a non-profit that offers congregate meals and home-delivered meals to Lakewood's senior and disabled residents. The City also operates a Meals-on-Wheels Program, which provides meals to disabled persons of any age, as well as homebound seniors. In addition, the City's DASH transportation system is free to persons with disabilities, and Long Beach Transit offers a Dial-A-Ride service for elderly persons and persons with disabilities.

Persons with HIV/AIDS

Persons with HIV/AIDS sometimes face bias and misunderstanding about their illness that affect their access to housing. Such persons may also be targets for hate crimes. The Los Angeles County Department of Health, HIV Surveillance System, September 30, 2024 reported at year-end 2020, there were 172 residents aged 13 years or older living with diagnosed HIV (PLWDH) in the City of Lakewood. At year-end 2023, there were 181 residents aged 13 years or older living with diagnosed HIV (PLWDH) in the City of Lakewood. Of the 181 cases reported for 2023, 162 cases (90%) were male and 19 cases (10%) were female.

The City of Lakewood contracts with Pathways Volunteer Hospice to provide in-home non-medical services to terminally ill patients. Pathways Volunteer Hospice was originally a community outreach program established in 1985 by the Lakewood Regional Medical Center and has operated independently as a State agency since 1987. Services include physical, psychological, social and spiritual support to patients and family members.

The County of Los Angeles Department of Health Services funds AIDS services through Title I of the Comprehensive AIDS Resources Emergency (CARE) Act of 1990. Services include primary health care, mental health counseling, in-home care and treatment services, dental, case management, recreation/social, outreach and education, and transportation services.

Homeless Persons

Homeless persons often have a difficult time finding housing once they have gone through a transitional housing or other assistance program. Aside from the limited availability of affordable housing, some landlords may be unwilling to rent to someone who was formerly homeless. The difficulties may be even greater for homeless families and single-parent families who need larger affordable units to accommodate children.

According to the latest (2024) Homeless Count conducted by Los Angeles Homeless Services Authority (LAHSA), there are 86 persons experiencing homelessness Lakewood. The City does not directly provide supportive services to the homeless population through formal programs, however, homeless services are provided to people experiencing homelessness in Lakewood by multiple non-profit agencies, which include PATH, LAHSA Jovenes, Salvation Army, Bell Shelter and Pacific Clinic. Lakewood contracts with the Los Angeles County Sheriff's Department providing Lakewood with a Homeless Services Deputy and also contracts a Homeless Services Liaison. Services begin with outreach and continue until a person is permanently housed and supportive services are in place. The Homeless Services Deputy and Homeless Services Liaison refer and connect homeless individuals to the agency that best suits their housing and health needs.

The City offers assistance when specific needs arise. The City's Recreation and Community Services Department has provided its park staff with instructions to direct the needy and homeless to the City's Burns Community Center for assistance. At the Burns Community Center, which is the headquarters for homeless assistance in the City, the homeless receive information and access to referral services to address their immediate needs (food, shelter, etc.), as well as long-term guidance (health services, employment, etc.). The Burns Community Center estimates that the Center assists approximately 30 homeless persons a year. The City will continue to support its existing services as well as those provided by the County and other nearby jurisdictions. In February 2012, the City amended the Zoning Ordinance to permit emergency shelters by right in the M-2 zone. This is to comply with State law (SB2) requiring that a zone be identified to permit emergency shelters by right. This was also identified as a program in the certified Housing Element.

2.3 Income Profile

Household income is the most important factor affecting housing opportunity, determining a household's ability to balance housing costs with basic necessities. While economic factors limiting housing choice are not fair housing issues, the relationship between household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

According to the 2023 ACS 1-Year Estimates, Lakewood residents earned a median household income of \$117,970, which is significantly higher than the median family income in Los Angeles Metropolitan Area, which was \$91,960. Historically, the median family income in Lakewood has consistently been higher than that of the County as a whole. Using updated income guidelines, current housing affordability in terms of home ownership can be estimated for the various income groups. The Department of Housing and Urban Development requires reporting on three income categories for the Consolidated Plan, based on the 2024 County median family income for a family of four persons, which is \$98,200:

- Extremely Low Income: 0-30% of the County MFI (Less than \$41,600)

- Very Low Income: 31%-50% of the County MFI (Less than \$69,350)
- Low Income: 51%- 80% of the County MFI (Less than \$110,950)

The extremely low to low income groups are collectively referred to as lower income groups. Most federal programs provide assistance to only those households in the lower income categories. As reported in the 2017-2021 CHAS Databook, prepared by HUD, approximately 63 percent of households in the City of Lakewood fall in the middle and upper income categories (earning from 81 to 100 percent, and over 100 percent of County MFI, respectively), while 37 percent of households fall in the extremely low, very low, and low income categories (earning up to 30 percent, from 31 to 50 percent, and from 51 and 80 percent of County MFI, respectively). Within the lower income groups, about 80 percent are elderly households. (See Table 2-5). Figure 2.5 below shows the concentration of low and moderate-income households.

Table 2-6: Income by Household Type

Household Type	Income Group			
	Extremely Low (0-30%)	Low (31-50%)	Moderate (51-80%)	Middle (81-100%) and Upper (100%+)
Elderly (62 and over)	52.2%	43.6%	23.2%	15.0%
Small Related (2 to 4)	23.2%	34.5%	48.4%	59.2%
Large Related (5+)	4.6%	10.2%	16.0%	13.5%
Other	20.0%	11.7%	12.4%	12.2%
Total	100.0%	100.0%	100.0%	100.0%
% of Total Households	10.6%	11.3%	15.5%	62.6%

Source: 2017-2021 CHAS Databook, Table 7

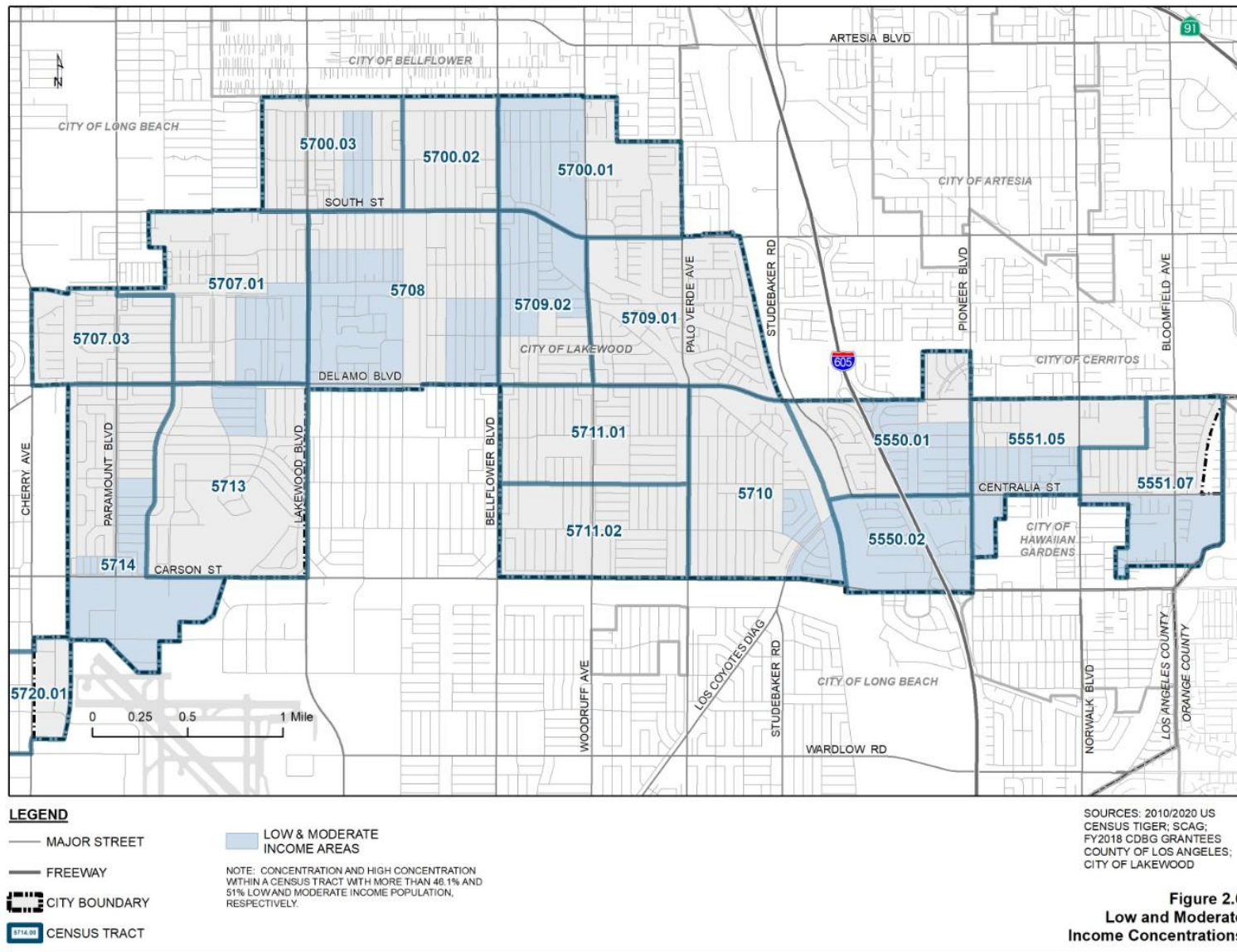
Income by Race/Ethnicity

Table 2-7 shows the income distribution of households by race and ethnicity as a percentage of median family income (MFI). As the table shows, the income distribution is similar among all racial groups. However, the category defined as Other or Multi-Race were represented the most in the middle and upper (100+% MFI) group. Nearly 80% of all groups fall into the middle or upper categories. The proportions for the extremely low and low income groups were similar across all races.

Table 2-7: Household Income Distribution by Race/Ethnicity

Race/Ethnicity	Income Group (% of MFI)				
	Extremely Low (0-30%)	Very Low (31-50%)	Low (51-80%)	Moderate (81-100 %)	Upper (100+ %)
Asian	15.2%	9.6%	18.7%	9.3%	47.2%
African American	9.3%	16.5%	17.9%	20.0%	36.3%
American Indian or Alaskan Native	17.6%	28.5%	6.7%	9.2%	38.0%
Hispanic (any race)	9.4%	12.2%	20.8%	13.0%	44.6%
Pacific Islander	9.4%	15%	8.1%	0%	67.5%
White	13.0%	5.2%	16.5%	19.0%	46.3%
Other Race	12.3%	13.6%	20.6%	11.7%	41.8%
Two or more Races	14.5%	8.2%	17.3%	13.1%	46.9%
Total	12.4%	8.9%	18.9%	14.6%	45.2%

Source: ACS 2023



2.4 Housing Profile

An assessment of the housing market in question must precede any discussion of Fair Housing Choice. This section provides an overview of the characteristics of the local and regional housing markets.

Housing Growth

During the 18-year period from 2000 to 2018, the increase in housing units has been minimal in Lakewood, with an increase of approximately 179 dwelling units. As shown in Table 2-8, a majority of the housing growth in Lakewood occurred prior to 1960. The City has been essentially built out since 1970, therefore, creating limited opportunities for future housing growth. As the table shows, the number of housing units increased by three percent during the 1990-2000 period, during the 2000-2010 period just over 2 percent, and 0.3 percent during the 2010-2018 period. However, between 2018 and 2024, the City saw increase of 2 percent due to the construction of ADUs. The ratio between single-family and multi-family units remained fairly constant during these periods. In 2000, 84% of units were single-family residences and 16% multi-family residential. In 2016, 87% of units were single-family residences and 13% multi-family residential. These figures do not include mobile homes and trailers, which has remained at 88 units over the past 20 years.

Table 2-8: Housing Stock Growth

Year	Number of Units	Percent Change
1960	18,301	--
1970	24,208	32.3%
1980	26,250	8.4%
1990	26,795	2.1%
2000	27,310	1.9%
2010	27,407	0.3%
2018	27,489	0.3%
2024	28,043	2.0%

Source: 1960 through 2010 U.S. Census; California Department of Finance, E-5, 2018.

- Mobile Home data from City of Lakewood 2021-2029 Housing Element.

Table 2-9 provides a summary of the housing stock by type within Lakewood up 2024. Because of Lakewood's slow housing growth, its housing type has remained fairly consistent. Of the housing units added to the housing stock from 2010 to 2018, nearly all (93%) were the result of the development of single-family attached units. In 2024, the City of Lakewood saw an increase of over 550 units, mainly due to the construction of ADUs. The number of mobile homes and trailers has remained stable at 88 units over this period.

Table 2-9: Housing Stock

Housing Type	Number of Units 2018	Number of Units 2024	Percent Change
Single-Family Detached	22,708	23,114	1.8%
Single-Family Attached	1,051	1,124	6.9%
Multi-Family (2-4 Units)	378	392	3.7%
Multi-Family (5 or more Units)	3,264	3,325	1.8%
Mobile Homes	88	88	0.0%
Total	27,489	28,043	2.0%

Source: California Department of Finance, E-5, 2018 and 2024.

Mobile Home data from City of Lakewood 2021-2029 Housing Element.

Tenure

Housing tenure refers to whether the inhabitant of a unit owns or rents the occupied unit. Housing tenure is important because it reflects the income levels of residents, the relative cost of various housing opportunities and also the ability to afford housing. The majority of Lakewood's households live in owner-occupied units. According to the 2017-2021 American Community Survey, 73 percent of the households were owners and 27 percent were renters. The owner to renter ratio is much higher than Los Angeles County's 46 percent owner to 54 percent renter ratio. Lakewood's tenure distribution has remained relatively the same since 1990.

Overcrowding

Overcrowding can be caused by a number of factors; however, it is also an indicator of a lack of affordable housing. Generally, unit overcrowding results from a combination of low earnings and high housing costs in the community. This is a reflection of the inability of households to buy or rent housing, which forces families to have extended family members or non-family members rent space from the primary family. The Census defines overcrowded households as units with greater than 1.01 persons per room, excluding bathrooms, hallways, and porches. Severely overcrowded households have greater than 1.5 persons per room.

As shown in Table 2-10, from 2000 to 2010, overcrowded housing in Lakewood decreased significantly from 12.2% in 2000 to 5.7% in 2010. Conditions of overcrowding in the City continued to decrease slightly from 2010 to 2019 to 5.3%. The decrease of overcrowding may have been the result of the steadily growing economy and job growth. However in 2023, the City saw the percentage of overcrowding jump to 9.2%. The same trend applies to severe overcrowding for the same time period.

Table 2-10: City of Lakewood Overcrowded Housing

Overcrowded Conditions	2000		2010		2019		2023	
	Over-crowded Housing	% of Over-crowded Housing	Over-crowded Housing	% of Over-crowded Housing	Over-crowded Housing	% of Over-crowded Housing	Over-crowded Housing	% of Over-crowded Housing
Overcrowded (1.01 – 1.50 persons per room)	1,659	6.2%	956	3.7%	1,080	4.1%	2,046	8.2%
Severely Overcrowded (Greater than 1.5 persons per room)	1,619	6.0%	539	2.1%	460	1.7%	241	1.0%
Total	3,278	12.2%	1,495	5.7%	1,379	5.3%	2,287	9.2%

Source: 2000 Census: Profile of Selected Housing Characteristics, 2006-2010 ACS, City of Lakewood 2021-2029 Housing Element and 2023 American Community Survey

Housing Cost and Affordability

Many housing problems are directly related to the cost of housing in a community. If housing costs are relatively high in comparison to household income, a correspondingly high prevalence of housing cost burden and overcrowding occurs. This section evaluates the affordability of the housing stock in Lakewood to low and moderate income households.

Owner-Occupied Housing

The value of homes varies substantially within the City of Lakewood, depending on the age, size and location of the home. In 2000, Lakewood's homes had an estimated overall median value of \$210,000 and increased to \$550,000 in 2006. By 2010, the median home price for existing single-family homes in Lakewood had fallen to \$390,000 and bottomed out at \$352,200 in 2011. In 2014, the median asking sales price for a single-family home in Lakewood had increased to \$438,500. According to Zillow, in 2024 the median asking price for a single-family home in Lakewood had risen to \$855,177. For the same time period, the median home value for surrounding jurisdictions was \$843,438 and the average was \$970,718. The median home price in Lakewood is slightly above the median and the average for the surrounding area:

Paramount	\$625,711
Bellflower	\$768,513
Long Beach	\$830,525
Downey	\$856,352
Cypress	\$1,039,614
Cerritos	\$1,703,594

Renter Occupied Housing

The rental housing market in Lakewood is comprised primarily of apartments and single-family homes. As shown in Table 2-11, apartment rents range from \$1,542 - \$1,905 for a studio or one-bedroom apartment and \$2,381 for a two-bedroom unit. Three bedroom units average \$2,871. According to realtor.com, three-bedroom, single-family home rates range from \$3,400 to \$5,500.

In 2014, the median price for a home in Lakewood was \$438,500 but by the end of 2018, it had risen to \$575,000 as noted above. In 2018 the median home price in Los Angeles County was \$597,500. This indicates that, with respect to home prices, Lakewood fared similar to the County as a whole. This demonstrates that Lakewood is a stable community as further reflected by a homeownership rate of 7.4% according to the Local Profiles Report 2019, Profile of the City of Lakewood, Southern California Association of Governments (SCAG).

In 2024, the median rent in Lakewood was \$2,381, which was lower than the Los Angeles County median rent of \$2,992. Table 2-11 presents a summary of rental rates and median home prices for both Lakewood and the County for 2024.

Table 2-11: 2024 Rental Rates

Rental Unit Types	Lakewood (2024)	L.A. County (2024)
Studio	\$1,542	\$1,697
1 Bed	\$1,905	\$2,158
2 Bed	\$2,381	\$2,992
3 Bed	\$2,871	\$4,266
Median Rent	\$2,381	\$2,992

Source: Apartments.com

Housing Affordability

Based on Federal and State guidelines that households should not spend more than 30 percent of their gross income on housing, the following table estimates the maximum housing costs affordable to very low income, low income, and moderate income households in Lakewood. The affordability threshold is adjusted based upon the size of the households.

Using updated income guidelines, current housing affordability in terms of home ownership can be estimated for the various income groups.

HUD requires reporting on four income categories for the Consolidated Plan, based on the 2024 Los Angeles County median family income for a family of four persons, which was \$98,200

- Extremely Low Income: 0-30% of the County MFI (Less than \$41,600)
- Very Income: 31%-50% of the County MFI (Less than \$69,350)
- Low Income: 51%- 80% of the County MFI (Less than \$110,950)
- Moderate Income: 81%- 120% of the County MFI (Less than \$117,850)

Assuming that the potential homebuyer for each income group has sufficient down payment, credit, and maintains housing expenses no greater than 30% of their income, the maximum affordable home prices can be calculated. As shown in Table 2-12, comparing the affordability with current market data on rents and mortgages indicates that:

- Extremely low-income households cannot afford housing of adequate size in the City of Lakewood. In particular, extremely low-income households cannot afford rental or homeownership in Lakewood.
- Lower, Moderate and Median income households are able to rent one and two-bedroom apartments. Homeownership is not affordable to these income groups.
- For Moderate Income households, however, though they still cannot afford a median priced home in Lakewood, they are very close to home ownership.

Table 2-12: 2024 Affordable Housing Prices and Rents by Income Groups

Income Category	Max. Home Purchase Price	Max. Home Rental Rate
Extremely Low Income (0-30% MFI) Less than \$41,600	\$210,000	\$1,155/month
Very Low Income (31%- 50% MFI) Less than \$69,350	\$350,000	\$1,926/month
Lower Income (51%- 80% MFI) Less than \$83,500	\$419,000	\$2,319/month
Median Income (100%) Less than \$98,200	\$495,000	\$2,727/month
Moderate Income (101-120%) Less than \$125,300	\$634,000	\$3,480/month

*Based on County Median Family Income of \$98,200. Calculation of affordable rent is based on 30% of gross household income. Calculation of affordable home purchase is based on down payment of 20%, annual interest rate of 7.3%, 30-year mortgage, and monthly payment of 30% of gross income.

Housing Cost Burden

According to 2017-2023 CHAS Data set, Table 3, 210 (0.78%) of Lakewood households were units with physical defects, 8,570 (32.1%) had overpayment issues, and 1,315 households had overcrowded conditions (4.9%). The housing assistance needs of renters were greater than owners, despite the 73% to 27% ratio of homeowners to renters. Among the household types, an average 45% of the low and moderate income households experienced some type of housing issue. The biggest impact was housing cost burden to the extremely low income of both homeowners (65%).

2017-2023 CHAS Data set, Table 7, 8,499 households or approximately 32% of Lakewood's total households overpaid for housing. Nearly two-thirds (65%) of the overpaying households were owners. One-third of the renter households who overpaid for rent were very low income as compared to one-fifth of owner households that were very low income. Providing for this need involves making affordable units available to extremely low and very low income households or providing government subsidies to lower income households. The distinction between renter and owner overpayment is important, because while homeowners may overextend themselves financially to purchase a home, they retain the option of selling. Renters, however, are limited to the rental market and are generally required to pay the rent established in that market.

Housing Condition

Accurate assessment of housing conditions can provide the basis for developing appropriate programs to maintain the quality of living in Lakewood. Housing units like any other tangible asset is susceptible to deterioration over time. Declining housing conditions can lower property values and discourage reinvestment as well as increase crime and promote slum and blight. Common repairs needed include new roofs, wall plaster and stucco. Homes 30 years or older with deferred maintenance require more substantial repairs, such as new siding, plumbing or multiple repairs to the roof, walls, etc. According to the recent estimates, approximately 95 percent of the City's housing stock or units are older than 30 years.

Table 2-13: City of Lakewood, Age of Housing Stock 2020

Year Built	Percent Share
2020 and later	0.6%
2010-2019	0.3%
2000-2009	1.5%
1990-1999	0.0%
1980-1989	6.7%
1970-1979	5.9%
1960-1969	10.7%
1950-1959	62.3%
1940-1949	11.0%
< 1939	1.0%
Total	100.0%

Source: 2023- ACS 1-Year Estimates

Code Enforcement

The City has a complaint-based code enforcement program known as the Community Conservation Program. The program divides the City into three areas, each with a Community Conservation Representative who responds to citizen service requests

regarding building, planning and zoning, and other property maintenance issues. More than 150 service requests are handled per month. The Community Conservation representatives work closely with the Housing Section of the Community Development Department to direct eligible property owners to City-sponsored rehabilitation programs to correct any code violations.

A primary concern of the Community Conservation Program is unsightly property. The property owners and/or tenants are notified by the City of accumulated refuse or debris, inoperative vehicles, overgrown vegetation, graffiti, building and/or zoning violations. In a move against graffiti, the City provides the labor and paint to remove any markings. If a color is requested, the City will use the property owner's paint for coverage.

A second concern is unauthorized rentals, often a result of the illegal conversion of garages to rental units. Illegal rentals may pose health and safety problems as the units may not be constructed or converted according to minimum health and safety standards.

The City also employs a Public Nuisance and Property Abatement Team, which consists of an assigned Sheriff's deputy, three Community Conservation Program representatives and a City prosecutor. Since 1999, the Team has worked to identify and "clean-up" residential and commercial properties that created a nuisance or provided a haven for crime, or otherwise disturbed the peace and safety of Lakewood residents. The program representatives handle notices for code violations, which are generally simple for property owners to correct. When there is criminal activity taking place on the property, the Los Angeles County Sheriff may become involved and the City Prosecutor may prosecute the person(s) responsible.

Another method to gain compliance from code violators is to have the Planning and Environment Commission reconvene as the Building Rehabilitation Board to address substandard properties. Typically, a code enforcement officer will recommend that the Building Rehabilitation Board to take a certain action within a given timeline. This method has proven effective in gaining compliance with property owners or abatement by the City.

2.5 Public and Assisted Housing

The availability and location of public and assisted housing is a fair housing concern if such housing is concentrated in one area of a city and, therefore, a household's access to housing may be limited to that area. In addition, public/assisted housing, including Section 8 rental assistance, should be accessible to lower income households regardless of race/ethnicity, disability or other special needs populations.

Section 8 Tenant-Based Vouchers

The Los Angeles Housing Authority administers the Section 8 Rental Assistance Program for the City. The Section 8 Program is a federally funded rental assistance program for families who are low income, elderly and disabled. Under this program,

housing choice vouchers are provided to allow very low income families to choose and lease safe, decent, and affordable privately-owned rental housing. A housing subsidy is paid to the landlord directly by the Housing Authority on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program.

Eligibility for a housing voucher is determined by the Housing Authority based on the total annual gross income and family size and is limited to US citizens and specified categories of non-citizens who have eligible immigration status. In general, the family's income may not exceed 50% of the median income for the county or metropolitan area in which the family chooses to live.

Affordable Housing Projects

Apartment projects can receive housing assistance from a variety of sources in order to ensure that rents are affordable to low and moderate Income households. In exchange for public assistance, project owners are required to reserve a portion or all of the units for low and moderate-income households, with the length of use restrictions dependent upon the funding program. The City currently contains six assisted housing projects that provide 327 units of affordable housing:

- Candlewood Park - 81 units
- Whispering Fountains - 161 units
- Seasons - 85 units

The City has 2 low-income housing apartment projects totaling five apartment units and approximately 300 Accessory Dwelling Units (ADUs). Additionally, the City successfully negotiated the transfer of nine parcels of land in exchange for the development of 37 affordable for sale townhomes. Construction of the homes is expected to begin in July of 2025.

2.6 Licensed Community Care Facilities

Persons with special needs, such as the elderly and those with disabilities, must also have access to housing in a community. Community care facilities provide a supportive housing environment to persons with special needs in a group situation. Restrictions that prevent this type of housing represent a fair housing concern since lack of such housing impedes special needs groups from access to adequate housing. There are currently 25 community care facilities in the City of Lakewood, including 21 adult care facilities, three adult day program facilities, and one small family home. Figure 2-7 shows the location of these facilities.

2.7 Accessibility of Public Transit

Public transit is often the only travel option for lower income households. Public transit should link lower income households to major employment centers. A lack of

relationships between public transit, job centers, and affordable housing may impede Fair Housing Choice because persons who depend on public transit will be limited in the choice of where they can live.

Elderly persons and persons with disabilities are more likely than other groups to be transit dependent. Many rely on public transit to visit doctors, go shopping, or attend activities offered at the community centers. Housing for the elderly and persons with disabilities should be located near transit routes, or alternative transit should be made available for persons with special needs. This section discusses the accessibility of public transit to major employers, medical facilities, and other community facilities from lower income areas and housing for persons with special needs.

Public Transit

The Los Angeles County Metropolitan Transportation Authority (MTA), Long Beach Transit (LBT), Orange County Transportation Authority (OCTA) and Lakewood DASH provide transit services within the City. The combination of these agencies provides access within Lakewood and to other communities throughout the region. For passengers unable to use the regular bus service, the MTA-sponsored Access Paratransit service and the Long Beach Transit Dial-A-Ride provide services throughout the City. Lakewood Center mall serves as the transit hub for the City, with several different bus lines providing service to and from the mall.

Los Angeles County Metropolitan Transportation Authority (MTA)

MTA supports the needs of the disabled community by ensuring that all bus lines are accessible through wheelchair lifts and that rail systems are ADA-compliant for passengers with hearing, mobility, and visual impairments. Also, MTA offers reduced fares to disabled passengers. To assist riders with visual impairments, MTA provides Braille-encoded and large type "Metro Flash Books" for signaling the correct bus.

Two MTA bus routes provide service to Lakewood residents:

Line 265 originates at Lakewood Center mall and continues to the City of Pico Rivera. The route stops in North Long Beach, Paramount and Downey. *provides connection to the Metro Green Line light rail, which provides service to Los Angeles International Airport (LAX).*

Line 266 provides service from Lakewood Center mall to the City of Pasadena. En route to Pasadena, the bus route serves the communities of Bellflower, Downey, Pico Rivera, South El Monte, and Temple City. *The route also provides a connection to the Metro Green Line light rail.*

Long Beach Transit (LBT)

LBT operates several bus lines throughout Lakewood and the surrounding communities, with connections to MTA bus and rail service and OCTA bus service. LBT offers both fixed-route and Dial-A-Ride services in Lakewood.

Fifteen LBT bus routes provide service within the City of Lakewood:

Routes 21 and 23 originate at Rosecrans Avenue in the City of Paramount and run through Lakewood to the Long Beach Transit Mall, where a connection to the Metro Blue Line and several Long Beach Transit lines are provided.

Route 22 originates at Lakewood Boulevard in the City of Bellflower. Route 22 runs Downey Avenue through Lakewood to the Long Beach Transit Mall, where a connection to the Metro Blue Line and several Long Beach Transit lines are provided.

Routes 91, 92, and 93 provide service from the City of Bellflower to the Long Beach Transit Mall, where a connection with the Metro Blue Line light rail and several Long Beach Transit lines is provided. Stops within Lakewood include Lakewood Center mall, the Lakewood Civic Center, and Lakewood High School.

Route 101 runs from Santa Fe Avenue to the Long Beach Towne Center. The route provides a connection to the Metro Blue Line light rail and makes stops at Long Beach City College, and multiple stops along Carson Street as it approaches the Long Beach Towne Center.

Route 103 provides service along Carson Street to in Long Beach from Santa Fe Avenue to Lakewood Civic Center and Lakewood Center mall.

Routes 111 and 112 connect Lakewood Center mall to the Long Beach Transit Mall. Stops include Lakewood Medical Center, Long Beach City College, and Long Beach Airport.

Route 172 provides service from the Long Beach Transit Mall to the Norwalk Green Line Station. The buses also make stops at along Palo Verde Avenue in Lakewood, Long Beach City College, CSU Long Beach, Long Beach Towne Center, and Cerritos College.

Route 173 provides service from the Long Beach Transit Mall to Los Cerritos Mall in the City of Cerritos. The buses also make various stops in Lakewood along Carson Street and Norwalk Boulevard.

Route 191 runs from the Long Beach Transit Mall to Artesia High School. The bus makes stops at the Del Amo Blue Line Station and the Lakewood Center mall.

Route 192 provides service from the Long Beach Transit Mall to the Los Cerritos Center in the City of Cerritos. The bus also makes stops at the Del Amo Blue Line Station and the Lakewood Regional Medical Center.

Cerritos on Wheels (COW)

Route 1 and 2 provides service to and from Del Amo Boulevard, Pioneer Boulevard and Palo Verde Avenue in Lakewood to Cerritos College, ABC Adult School, Cerritos Senior Center, Cerritos Post Office, Cerritos Civic Center and various park facilities in Cerritos.

Orange County Transportation Authority (OCTA)

OCTA supports the needs of the disabled community by providing wheelchair lifts on buses and by offering reduced fares for elderly passengers and passengers with disabilities. In addition, OCTA offers the ACCESS service, which provides door-to-door service for passengers who are unable to board regular fixed-route buses.

One OCTA line serves Lakewood:

Route 38 runs from Del Amo Boulevard and Pioneer Boulevard in Lakewood to the Anaheim Hills area. The bus stops at the Buena Park Mall and the Anaheim Hills Metrolink station.

Major Employers

Table 2-13 shows the top ten employers in the City. Overall, 27 businesses in Lakewood had 100 or more employees, and nine had more than 200 employees. Figure 2.6 shows the location of these employers in relation to the City's employment centers. As the figure shows, most of the major employers are located near Lakewood Center mall, which serves as the City's transit hub. All other employers are located in close proximity to bus routes traversing the City.

Table 2-14: Major Employers

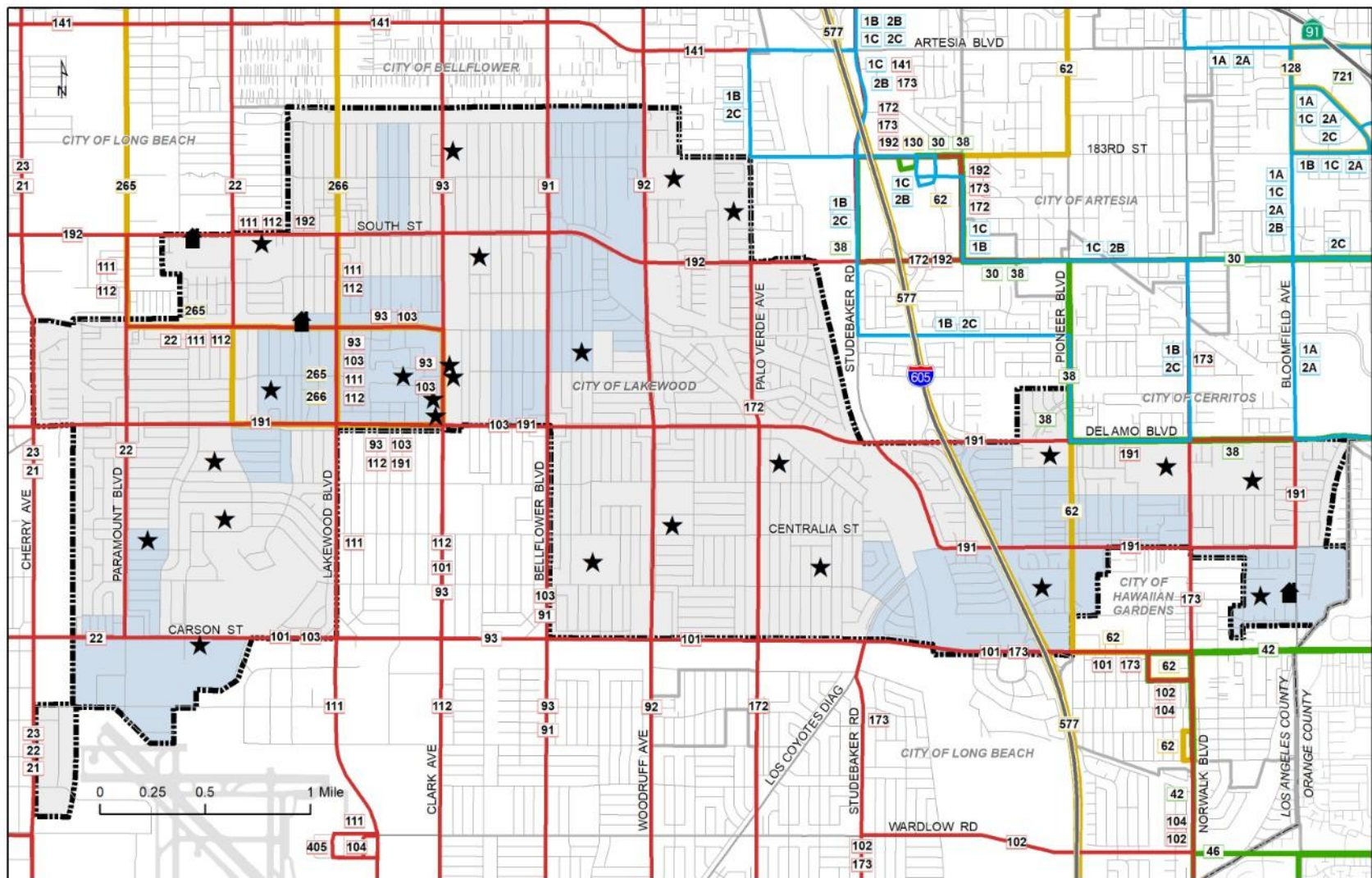
Business	Number of Employees
Long Beach Unified School District	909*
UCI Health	791*
City of Lakewood	607
Dept. of Children and Family Services	435*
Bellflower Unified School District	236
Los Angeles County Sheriff's Department	230
ABC Unified School District	280
Home Depot	302*
Cost Co	422
Albertson's	98

Source: Lakewood Community Development Department Staff contacted each employer for information.

*Information from 2020, employer did not respond for request for information

Community Facilities

Many lower income households, elderly, and persons with disabilities depend on public transit to reach community facilities, such as hospitals/clinics, community centers, public libraries, parks, and schools. Figure 2.7 shows the location of the community facilities, along with the location of transit routes and the assisted housing complex. As the figure shows, most of the community facilities are located immediately adjacent to public transportation routes.



LEGEND

- MAJOR STREET
- FREEWAY
- CITY BOUNDARY
- LOW & MODERATE INCOME AREAS

PUBLIC TRANSIT

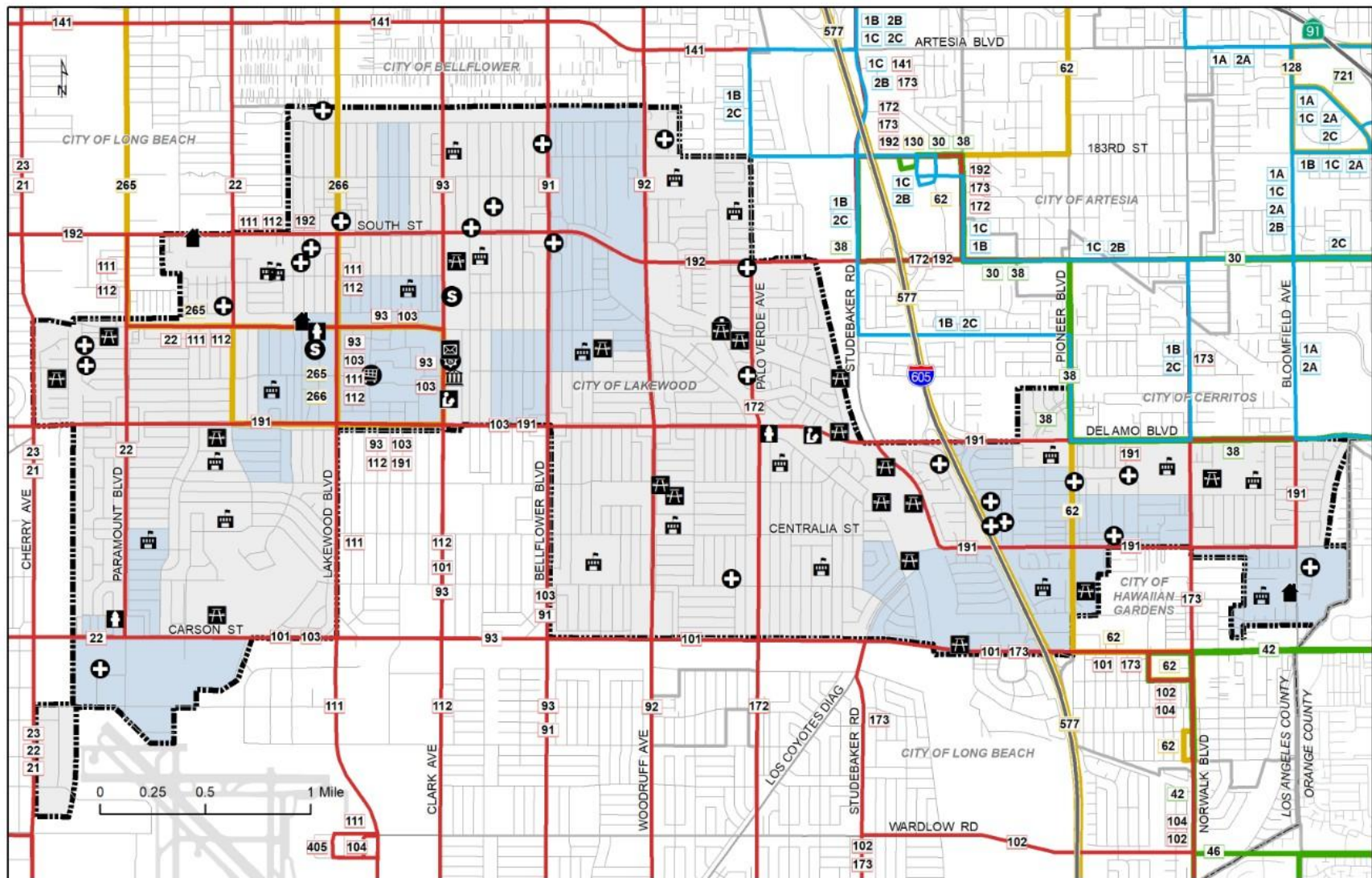
- 265 METROPOLITAN TRANSPORTATION AUTHORITY (METRO)
- 30 ORANGE COUNTY TRANSPORTATION AUTHORITY (OCTA)
- 173 LONG BEACH TRANSIT (LBT)
- 2-A CERRITOS ON WHEELS (COW)

- ★ TOP EMPLOYER
- PUBLIC & ASSISTED HOUSING

SOURCES: 2010/2020 US CENSUS TIGER; FY2018 CDBG GRANTEES; OCTA; METRO; COW; LBT; COUNTY OF LOS ANGELES; CITY OF LAKEWOOD

NOTE: CONCENTRATION AND HIGH CONCENTRATION WITHIN A CENSUS TRACT WITH MORE THAN 48.1% AND 51% LOW AND MODERATE INCOME POPULATION, RESPECTIVELY

Figure 2.7
Transit Accessibility to Employment Centers



LEGEND

- MAJOR STREET
- FREEWAY
- CITY BOUNDARY
- LOW & MODERATE INCOME AREAS

PUBLIC TRANSIT

- 265 — METROPOLITAN TRANSPORTATION AUTHORITY (METRO)
- 30 — ORANGE COUNTY TRANSPORTATION AUTHORITY (OCTA)
- 173 — LONG BEACH TRANSIT (LBT)
- 2-A — CERRITOS ON WHEELS (COW)

COMMUNITY FACILITIES

- CITY HALL
- FIRE STATION
- PUBLIC LIBRARY
- LICENSED CARE FACILITY
- PARK
- PUBLIC & ASSISTED HOUSING
- POST OFFICE
- PUBLIC SCHOOL
- SHERIFF STATION
- REGIONAL MALL
- SENIOR CENTER

SOURCES: 2010/2020 US CENSUS TIGER; FY2018 CDBG GRANTEES; OCTA; METRO; COW; LBT; STATE OF CA; COUNTY OF LOS ANGELES; CITY OF LAKEWOOD

NOTE: CONCENTRATION AND HIGH CONCENTRATION WITHIN A CENSUS TRACT WITH MORE THAN 46.1% AND 51% LOW AND MODERATE INCOME POPULATION, RESPECTIVELY.

Figure 2.8
Transit Accessibility to Community Facilities and Assisted Housing

Chapter 3

Mortgage Lending Practices

An essential aspect of Fair Housing Choice is equal access to credit for the purchase or improvement of a home. In the past, fair lending practices were not always employed by financial institutions. Credit market distortions and other activities such as redlining¹ prevented some groups from equal access to credit. The passage of the Community Reinvestment Act (CRA) in 1977 and the Home Mortgage Disclosure Act (HMDA) in 1979 was designed to improve access to credit for all members of the community. This section reviews the lending practices of financial institutions and the access minorities and all income groups have to home loans.

Community Reinvestment Act

The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low and moderate income neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance. A search in the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), Office of the Comptroller of the Currency (OCC), and Office of Thrift Supervision (OTS) databases was performed.

Home Mortgage Disclosure Act

In tandem with the CRA, the Home Mortgage Disclosure Act (HMDA) requires lending institutions to make annual public disclosures of their home mortgage lending activity. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants.

Detailed HMDA data for conventional and government-backed home purchase and home improvement loans in Lakewood were examined. HMDA data provides some insight into the lending patterns that exist in a community. However, the HMDA data is used only to indicate the potential for unfair lending practices; the data cannot be used to reach definite conclusions on discriminatory practices.

¹ The word “redlining” refers to the practice whereby a lender provides unequal access to credit or unequal credit terms to a person because of their race, creed, color or national origin or other characteristic(s) of the residents of the area where the applicant resides or will reside.

3.1 Disposition of Conventional Home Loan Applications by Race and Income of Applicant

Conventional Home Purchase Loans

Approximately 939 conventional home purchase loan applications were processed for homes in Lakewood in 2023 (Table 3-1). White applicants accounted for the largest portion of applications, with 38.7% of the total loans processed. Of all loans processed, 37.1% did not provide race information, and 4.9% of loans were marked as not applicable (such as financial institutions, not profit groups, REOs, etc).

Overall, 536 (57.1%) of conventional loan applications were approved, 8.2% were denied, 12.4% were withdrawn, 22.3% percent were either not used, were closed or were REO. Approval rates for conventional home purchase loans varied by applicant race. A review of the data found that White applicants were the largest group whose loan was originated (25.2%) followed by Asian applicants (9.2%). African American applicants had an approval rate of 2.3%. However, the loan denial rate was more equally balanced among Asian, African American, and White applicants (1.2%, 0.3%, and 3.9%, respectively). This reveals that White applicants had more equity, income, or other assets to obtain a conventional loan than other races, but the proportion of White applicants who had their loan denies was not significantly disproportionate from Asian and African American/Hispanic applicants. Those loans where race information was not provided was the second highest among approval rates, 16.5%. For those loan applications where race information was not provided, 2.2% were denied.

Approval rates for Hispanic or Latino loan applicants were 14.4% and for Non-Hispanic or Latino applicants the rate was 28.0%. The difference is 14 percentage points, which is a significant difference between these two ethnic groups.

Table 3-1: Disposition of Conventional Home Purchase Loan Applications by Race, 2023

	Total		Approved		Denied		Withdrawn		Not Used/ Closed/REO	
Race	#	%	#	%	#	%	#	%	#	%
American Indian or Alaska Native	2	0.2%	1	0.1%	0	0.0%	1	0.1%	0	0%
Asian	139	14.8%	86	9.2%	11	1.2%	16	1.7%	26	2.8%
African American	33	3.5%	22	2.3%	3	0.3%	3	0.3%	5	0.5%
Native Hawaiian/ Pacific Islander	4	0.4%	2	0.2%	1	0.1%	1	0.1%	0	0%
White	363	38.7%	237	25.2%	37	3.9%	57	6.1%	32	3.4%
2 or More Races	4	0.4%	1	0.1%	1	0.1%	1	0.1%	1	0.1%
Information not provided	348	37.1%	155	16.5%	21	2.2%	29	3.1%	143	15.2%
Not applicable	46	4.9%	32	1.6%	3	2.1%	8	2.2%	3	36.9%
Total	939	100%	536	57.1%	77	8.2%	116	12.4%	210	22.3%
Ethnicity										
Hispanic or Latino	236	25.1%	135	14.4%	25	2.7%	43	4.6%	33	3.5%
Not Hispanic or Latino	388	41.3%	263	28.0%	34	3.6%	52	5.5%	39	4.2%
Information not provided	314	33.4%	137	14.6%	18	1.9%	21	2.2%	138	14.7%
Not applicable	1	0.1%	1	0.1%	0	0%	0	0%	0	0%
Total	939	100%	536	57.1%	77	8.2%	116	12.4%	210	22.3%

Source: Lending Patterns 2023

While Table 3-1 provides an overall illustration of the loan disposition among different races for conventional loans, Table 3-2 below provides a more detailed analysis of loan approval rate by race and income of the applicant. As shown in Table 3-2, approval rates generally do not vary significantly by income or among racial groups of the same income level with the exception of American Indian population. Table 3-2 shows that only 50% applications submitted by moderate income American Indians purchased a home in 2023. Other indications of loan trends rates are relatively low approval rates for applicants earning less than 80 percent of MFI and somewhat higher approval rates among those applicants earning between 100 to 120% of MFI and significantly higher approval rates among those applicants earning more than 120% of MFI.

Among the racial groups, Asians, African Americans and Whites tend to have higher approval rates while American Indians and those with two or more races had the lowest in three income categories. Among applicants earning more than 120 percent of MFI, the approval rates ranged between 25% and 50%.

In examining the approval rates among the races, all races combined had a 3.9% approval rate for incomes less than 80% of MFI.

Table 3-2: Approval Rates for Conventional Home Purchase Loan, 2023

Race	Loan Approval Rate by Income Level			
	< 50%	50 - 80%	80 - 120%	> = 120%
American Indian or Alaska Native	0%	0%	50%	0%
Asian	2.9%	6.5%	6.5%	46.3%
African American	3.1%	6.3%	9.4%	50%
Native Hawaiian/Pacific Islander	25%	0%	0%	25%
White	3.3%	5.2%	9.4%	47.5%
2 or More Races	0%	0%	0%	25%
Info Not Provided	2.0%	1.7%	2.3%	31%
All Applications	1%	3.9%	6.2%	44.8%

Source: Lending Patterns 2023

3.2 Disposition of Conventional Home Loan Applications by Lender

In 2023, mortgage lenders received a total of 856 applications for a conventional home loan in the City of Lakewood. Of those, 482 conventional home loans were processed. The top 10 lenders in Lakewood processed 217 of all home purchase loan applications (Table 3-3). The top lender was Rocket Mortgage which accounted for 10.5 percent of all loan applications and 14.7 percent of all approved loans. United Wholesale approved 70 loans in the City during this period. It should be noted that there are many smaller lenders that processed just a handful of loans. The top two lenders in Lakewood, Rocket Mortgage and United Wholesale have highest approval rates (origination) of the top 10 lenders. Together, these two lenders have approved 29.2 percent of all approved loans. All of the top ten banks had denial rates of one percent or less.

Table 3-3: Disposition of Conventional Home Purchase Loan Applications by Top 10 Lending Institutions by Market Share, 2023

Lender	Disposition of Loans									
	Total 856		Originated 482		Denied 74		Withdrawn 104		Closed 47	
	#	Market Share	#	Market Share	#	Market Share	#	Market Share	#	Market Share
Rocket Mortgage	90	10.5%	71	14.7%	7	9.7%	8	7.7%	0	0%
United Wholesale	88	10.3%	70	14.5%	8	11.1%	9	8.7%	0	0%
SchoolsFirst	23	2.7%	16	3.3%	0	0%	5	4.8%	1	2.1%
JP Morgan Chase	33	3.9 %	13	2.7%	0	11.1%	3	2.9%	2	4.3%
Wells Fargo	22	2.6%	10	2.1%	2	4.2%	7	6.7%	1	2.1%
U.S. Bank National Assoc	28	3.3%	9	1.9%	8	11.1%	5	4.8%	0	0%
Guaranteed Rate	20	2.3%	7	1.5%	0	0%	3	2.9%	5	10.6%
Bank of America	17	2.0%	7	1.5%	5	6.9%	1	1.0%	2	4.3%
Ocmbc, Inc.	16	1.9%	7	1.5%	1	1.4%	1	1.0%	0	0%
Cross Country, LLC	10	1.2%	7	1.5%	0	0%	3	2.9%	0	0%
Total	347	40.7%	217	45.2%	31	55.5%	45	43.4%	11	23.0%

Source: Lending Patterns 2023

Homebuyer Assistance Programs

A common obstacle for first-time homebuyers in achieving homeownership is inadequate savings to make a down payment. Also, it is difficult for some buyers to obtain financing, especially when they have little or no funds towards a down payment. For this reason, many lenders offer first time home buyer programs. These programs vary from lender to lender, and can change from year to year. It is prudent for first time home buyers to spend extra time shopping and comparing the programs and rates that each lender has to offer.

3.3 Disposition of Government-Backed Home Loan Applications

Government-backed financing represents an alternative to conventional financing. Sources of government-backed financing include loans insured by the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the Rural Housing Services/Farm Service Agency (RHS/FSA).

Table 3-4 compares the total applications, approvals, and denials for conventional and government-backed home purchase loans. There were a total of 273 government-backed home loan applications in Lakewood during 2023. Relative to conventional loans, government-assisted loans had a slightly lower approval rate than conventional lenders, and a higher denial rate. This is consistent of lending conditions offered in 2023. Overall, government-assisted applications account for 20.7 percent of all home purchase applications in Lakewood.

Table 3-4: Comparison of Conventional and Government-Backed Home Purchase Loan Applications, 2023

Disposition	Loan Type			
	Conventional		Government-Backed	
	# of Applications – 856 Total	% of Total	# of Applications – 273 Total	% of Total
Loans Approved	482	56.3%	126	46.2%
Loans Denied	74	8.6%	38	14.0%
Loans Closed	47	5.5%	17	6.2%
Total	603	70.4%	210	66.4%

Source: Lending Patterns 2023

3.4 Lending by Census Tract and Tract Income by Minority Concentration

To identify potential geographic differences in mortgage lending activities, an analysis of the HMDA data was conducted by Census Tract and tract income levels. Based on the 2020 Census, HMDA defines a tract based on the following income levels:

- Low and Very Low Income Tract – median income < 50% County MFI
- Moderate Income Tract – median income between 51 and 80% County MFI
- Middle Income Tract – Tract income between 81 and 120% County MFI
- Upper Income Tract – Tract income >=120% County MFI

Table 3-5 shows the total number of applications, the origination rate, and the denial rate by Census tract for conventional home purchase loans in 2023. As shown, the origination rates varied widely among Census tracts from 1.2 percent to 6.4. The median origination rate is 3.0 percent.

Table 3-5: Comparison of Conventional Home Purchase Loans by Census Tract, 2023

Census Tract	Loan Applications by Census Tract									
	Total		Originated		Denied		Withdrawn		Closed	
	# of Loans	% of Total	# of Loans	% of Total	# of Loans	% of Total	# of Loans	% of Total	# of Loans	% of Total
555001	45	5.3%	20	2.3%	4	0.5%	3	0.4%	8	0.9%
555002	38	4.5%	18	2.1%	5	0.6%	5	0.6%	2	0.2%
555105	44	5.1%	20	2.3%	4	0.5%	7	0.8%	4	0.5%
555107	61	7.1%	25	2.9%	2	0.2%	10	1.2%	5	0.6%
570001	48	5.6%	26	3.0%	5	0.6%	7	0.8%	5	0.6%
570002	19	2.2%	10	1.2%	2	0.2%	1	0.1%	1	0.1%
570003	61	7.1%	27	3.2%	10	1.2%	8	0.9%	3	0.4%
570701	66	7.7%	39	4.6%	6	0.7%	4	0.5%	6	0.7%
570703	40	4.8%	30	3.5%	1	0.1%	2	0.2%	0	0.0%
570800	45	5.3%	31	3.6%	2	0.2%	5	0.5%	3	0.4%
570901	50	5.7%	26	3.0%	4	0.5%	9	1.1%	2	0.2%
570902	43	5.0%	26	3.0%	2	0.2%	5	0.5%	3	0.4%
571000	89	10.4%	55	6.4%	9	1.1%	10	1.2%	0	0.0%
571101	53	6.2%	22	2.6%	2	0.2%	11	1.3%	1	0.1%
571102	42	4.9%	30	3.5%	2	0.2%	5	0.5%	1	0.1%
571300	75	8.8%	46	5.4%	8	0.9%	11	1.3%	1	0.1%
571400	37	4.3%	21	2.5%	6	0.7%	2	0.2%	2	0.2%
Total	856	100%	472	55.1%	74	8.6%	105	12.1%	47	5.5%

Source: Lending Patterns 2023

3.5 Mortgage Refinancing

In recent years, the real estate market has undergone a major shake-up. Although prices declined precipitously a few years ago, the median home price rose significantly since then. Purchasing and refinancing a home has become more difficult following the national housing crisis. Lending standards have become more stringent, compared to how the standards of the mid-2000's.

Relative to home purchase applications, approval rates for mortgage refinancing applications are very low for all groups, with only 51.6 percent of refinancing applications being approved in 2023. As Table 3-6 shows, White applicants comprised the largest portion of applicants whose race was known. White applicants had the highest approval rate (24.3 percent) while Pacific Islander and American Indian applicants had the lowest (0.5 percent). Those applicants who claimed two or more races were 0 percent. The loan approval rates for Asian (6.3 percent), African American persons (4.4 percent). Applicants of Hispanic origin (12.8 percent) were significantly lower than applicants of non-Hispanic origin (24.6 percent) in obtaining approval of a refinancing loan. Since several factors influence the approval of refinance applications, it is difficult to determine the reasons for the disparity between White applicants and applicants of other races.

Perhaps White applicants, who purchased or inherited their homes in much earlier times than other groups, had more home equity, and could more easily qualify for a loan.

Table 3-6: Trends of Conventional Mortgage Refinancing Applications by Race, 2023.

	Total		Originated		Denied		Withdrawn		Closed	
Race	# of Loans	% of Total	# of Loans	% of Total	# of Loans	% of Total	# of Loans	% of Total	# of Loans	% of Total
American Indian or Alaska Native	7	0.9%	4	0.5%	2	0.2%	1	0.1%	0	0.0%
Asian	104	12.8%	51	6.3%	37	4.6%	11	1.4%	4	0.5%
African American	70	8.6%	36	4.4%	18	2.2%	8	1.0%	4	0.5%
Native Hawaiian or Other Pacific Islander	6	0.7%	4	0.5%	2	0.2%	0	0.0%	0	0.0%
White	329	40.5%	197	24.3%	91	11.2%	23	5.8%	13	1.6%
Info. Not Provided	24	3.0%	19	2.3%	5	0.6%	0	0.8%	0	0.0%
N/A	270	33.3%	108	13.3%	83	10.2%	29	3.0%	17	2.1%
2 or more	2	0.2%	0	0.0%	1	0.1%	1	0.1%	0	0.0%
Total	812	100%	419	51.6%	239	29.3%	73	12.2%	38	4.7%
Ethnicity										
Hispanic	197	24.2%	104	12.8%	59	7.3%	20	2.5%	13	1.6%
Not Hispanic	357	44.0%	200	24.6%	105	12.9%	29	3.6%	12	1.5%
Info. Not Provided	48	5.9%	34	4.2%	8	1.0%	5	0.6%	1	0.1%
N/A	210	25.9%	81	10.0%	67	8.3%	19	2.3%	12	1.5%
Total	812	100%	419	51.6%	239	29.5%	73	9.0%	38	4.7%

Source: Lending Patterns 2023

3.6 Predatory Lending and Housing Fraud

With an active housing market, potential predatory lending practices by financial institutions may arise. Predatory lending involves abusive loan practices usually targeting minority homeowners or those with less-than-perfect credit histories. The predatory practices typically include high fees, hidden costs, unnecessary insurance, and larger repayments due in later years. One of the most common predatory practices is placing borrowers into higher interest rate loans than called for by their credit status. Although the borrowers may be eligible for a loan in the “prime” market, they are directed into more expensive and higher fee loans in the “subprime” market. In other cases, fraudulent appraisal data were used to mislead homebuyers into purchasing over-valued homes, or fraudulent or misrepresented financial data is used to encourage homebuyers into assuming a larger loan than can be afforded. Both cases almost inevitably result in foreclosure or undesired sale of the property.

Predatory lending has also penetrated the home improvement financing market. Seniors and minority homeowners are the usual targets. In general, home improvement financing is more difficult to obtain than home purchase financing. Many homeowners have too high a debt-to-income ratio to qualify for home improvement loans in the prime market and become targets of predatory lending in the subprime market. Seniors are often swindled into installing unnecessary devices or making unnecessary improvements that are bundled with unreasonable financing terms.

Predatory lending is a growing fair housing issue. Predatory lenders who discriminate get some scrutiny under the Fair Housing Act of 1968, which requires equal treatment in terms and conditions of housing opportunities and credit regardless of race, religion, color, national origin, family status, or disability. This applies to loan originators as well as the secondary market. The Equal Credit Opportunity Act of 1972 requires equal treatment in loan terms and availability of credit for all of the above categories, as well as age, sex, and marital status. Lenders that engage in predatory lending would violate these acts, if they target African American, Hispanic or elderly households to buy higher-priced and unequal loan products; treat loans for protected classes differently than those of comparably credit-worthy Whites; or have policies or practices that have a disproportionate effect on the protected classes. Examples of fair lending violations include giving an African American borrower a higher-cost loan than a White borrower with a comparable credit rating, or buying such a loan in the secondary market.

In 1998, HUD began an initiative to address fraud in programs administered by the federal agency. The “Housing Fraud Initiative” investigation involved the Federal Bureau of Investigation, Internal Revenue Service and U.S. Attorney’s Office, and uncovered over \$110 million in fraud involving three types of schemes:

- Originating fraudulent loans that allowed unqualified borrowers to obtain mortgages insured by the Federal Housing Administration;
- A scam in which real estate professionals obtain mortgages in the names of fictitious borrowers; and
- Equity skimming, in which an owner sells a property to a so-called “straw buyer” at an inflated price. The straw buyer then defaults, but the seller has already profited.

An example of equity skimming is when a person buys a \$100,000 HUD foreclosed home and resells it for \$200,000 to a buyer who does not exist, but is made “real” through false or forged documents. This person makes a \$100,000 profit from the fraudulent loan, money that should have been awarded to deserving HUD applicants.

HUD targeted Southern California first under the program to a large extent because the default rate in the 7 Southern California counties is 50 percent higher than the national rate. In particular, Los Angeles, Riverside, and San Bernardino counties are known to

have the highest concentration of FHA foreclosures. In Lakewood, no FHA foreclosed property is currently listed on HUD's web page.

In addition, HUD, in conjunction with the U.S. Department of Treasury, formed the Joint-Task Force on Predatory Lending in 2000. The Task Force conducted an in-depth investigation of the problem and issued recommendations to Congress regarding improving consumer literacy and disclosure, reforming sales practices, improving market structure, and restricting abusive terms and conditions.

The State of California has also enacted additional measures designed to stem the tide of predatory lending practices. Senate Bill 537 signed by former Governor Gray Davis provided a new funding mechanism for local District Attorney's offices to establish special units to investigate and prosecute real estate fraud cases. The law enabled county governments to establish real estate fraud prosecution units.² Furthermore, former Governor Davis signed AB 489 in October 2001, a predatory lending reform bill. The new law prevents a lender from basing the loan strictly on the borrower's home equity as opposed to the ability to repay the loan. The law also outlaws some balloon payments and prevents refinancing unless it results in an identifiable benefit to the borrower.³

² Consumers Union, *The Hard Sell: Combating Home Equity Lending Fraud in California - Part I*, 1998.

³ Consumers Union, "Governor Davis Signs Predatory Lending Reform, October 11, 2001.

Chapter 4

Public Policies

Public policies, particularly land use controls, zoning regulations, and housing policies have the potential to impact the location and availability of housing choices. This chapter of the AI reviews the public policies of Lakewood in relation to fair housing choices.

4.1 Covenants, Conditions, and Restrictions (CC&Rs)

In the past, Covenants, Conditions, and Restrictions (CC&Rs) were used to exclude certain groups such as minorities from equal access to housing in a community. Today, 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 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 real estate broker to revise the CC&Rs.

4.2 Public Policies and Programs Affecting Housing Development

The City’s Housing Element, General Plan, Planning and 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 local 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
- Community representation on planning and zoning boards and commissions

Local Zoning, Building, Occupancy, Health and Safety Codes

Zoning Ordinance

Higher density housing reduces land costs on a per-unit 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, accessory dwelling units (ADU), junior accessory dwelling units (JADU) group care facilities, and senior housing. Development standards such as density, height, setbacks, and parking are also specified in the Zoning Code. Table 4-1 identifies residential zone districts and development standards.

Table 4-1: Residential Zone Districts

Zone	Maximum Density	Maximum Height	Minimum Lot Size	Typical Residential Type
R-A	1 primary du, 2 ADUs and JADU per lot	35 feet	6,000 sq. ft.	Low-Density single family dwellings and accessory buildings; limited agriculture
R-1	1 primary du, 2 ADUs and JADU per lot	35 feet	6,000 sq. ft.	Low-Density single family dwellings and accessory buildings
M-F-R	32 du/ac ¹ , 40 du/ac ² , 50 du/ac ³ Plus 1 AUD per number of existing units but not more than 8 ADUs	25 feet	15,000 sq. ft.	Multi-family dwelling units and accessory buildings
MHP	10 du/ac	N/A	4 acres	Mobile Home

¹For parcels less than 12,500 square feet.

²For parcels 12,500 square feet to 25,000 square feet.

³For parcels greater than 25,000 square feet.

Source: Lakewood Land Use Element, Lakewood Municipal Code.

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.

California court cases⁴ have ruled that an ordinance that defines a "family" as (a) an individual, (b) two or more persons related by blood, marriage or 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,

⁴ *City of Santa Barbara v. Adamson. (1980), City of Chula Vista v. Pagard (1981), among others.*

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.

The Lakewood Zoning Code defines a family as follows:

“One or more persons living as a single housekeeping unit as distinguished from a group occupying a boarding, rooming, or lodging house, hotel, or club. A family may include domestic servants.” (Lakewood Municipal Code, Section 9302.23)

Though the use of “family” in the Lakewood Zoning Code does not appear to be restrictive, the mere presence of the definition can be confusing and could lead to the perception of restrictiveness.

Community Care Facilities

The Lanterman Developmental Disabilities Services 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 6 or fewer disabled persons is a residential use for the purpose of zoning. A State-authorized, certified or licensed family care home, foster 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. There are 20 community care facilities in the City of Lakewood. All facilities are located within residential zones.

Accessory Dwelling Units

Accessory dwelling units 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. Second units may be an alternative source of affordable housing for low income households, particularly for seniors. In September 2018, the City amended the Zoning Ordinance to permit accessory dwelling units by right in residential zones, subject to certain development standards. State law requires local jurisdictions to ordinances that establish the conditions under which accessory dwelling units will be permitted or to adopt the State law provisions governing second units (Government Code, Section 65852.2).

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 on single-family lots. In addition, the City has a Mobile Home Park zone, which allows for the establishment of mobile home parks.

Density Bonuses

In October 2014 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.

Parking Requirements

The Lakewood Zoning Code requires two covered parking spaces for each single-family unit. In the Multi-Family Residential (M-F-R) zone, dwelling units with two or fewer bedrooms require two parking spaces, units with three bedrooms require two and one-half parking spaces, and units with four or more bedrooms require three spaces. In addition, the zoning code requires that guest parking be provided in the M-F-R zone at a ratio of 10 percent of the spaces required for the units.

For senior housing or housing for persons with disabilities, parking requirements can be reduced to one parking space per three units plus one parking space for every three employees. The 10 percent additional guest parking is also required for these units.

Senior/Affordable Housing

Lakewood has three senior assisted-housing projects totaling 367 units. 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.

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.

Public and Administrative Policies Concerning Community Development and Housing Activities

Important criteria of the State Department of Housing and Community Development's (HCD) approval of any housing element includes a determination that the local jurisdiction's policies do not unduly constrain the maintenance, improvement, and development of a variety of housing choices for all income levels. The City's 2021-2029 Housing Element was approved by the Department of Housing and Community

Development on September 16, 2022. The 2021-2029 Housing Element identifies the following goals:

- 1.1 Preserve and improve the existing affordable housing stock.
- 1.2 Preserve and improve the residential neighborhood environments that provide a high quality of life for all Lakewood residents.
- 2.1 Develop housing to meet the identified local housing needs of the community while maintaining and providing a high quality of life for all Lakewood residents.
- 2.2 Develop the maximum number of new housing units possible to meet Lakewood's fair share of regional housing needs as identified in the SCAG regional housing needs assessment.
- 2.3 Achieve compliance with energy conservation measures to be included in new housing developments.
- 2.4 Provide suitable sites for housing development.
- 3.1 Provide housing assistance needs of Lakewood residents.
- 4.1 Promote housing opportunities for all persons regardless of race, color, ethnicity, national origin, religion, sex or marital status.

The following are summaries of key programs contained in the 2021-2029 Housing Element that facilitate the provision of quality housing and a range of housing choices:

- *Code Enforcement and Community Conservation* - The City has an active code enforcement program dedicated to preserving and improving the environmental quality of the City. Community Conservation Officers receive approximately 150 service requests each month. Community Conservation Program staff will continue to work closely with the Housing Section to refer eligible property owners to the rehabilitation loan programs offered through the City.
- *Home Rehabilitation Loan and Grant Programs* - The City offers home rehabilitation loan programs for low income household and senior household properties. The maximum loan amount for single-family homes is \$35,000. This program helps provide quality housing for seniors and lower income households. The City also offers a Fix-Up Paint-Up Grant Program, whereby households can receive minor home repairs. Another grant program was introduced during FY 2024-2025, whereby Lakewood residents residing in a single-family home and in need accessible modifications can receive a grant from the City to perform such modifications. In addition, the Teens in Lakewood Care (TLC) program provides general landscape maintenance and light housekeeping services to qualified low

- income property owners through a cooperative program between the City of Lakewood, the Lakewood Jaycees, and area high school students.
- *Condominium Conversion Regulations* - The Lakewood Municipal Code contains a Condominium Conversion Ordinance that restricts the conversion of rental units to owner-occupied units when the vacancy rate for the City is below five percent. By restricting the conversion of rental units, the City ensures that a variety of housing choices exist for residents.
- *Density Bonus* – Pursuant to State law, the City allows density bonuses for residential development projects. The City provides information regarding density bonuses and other housing incentives on the City website.
- *Section 8 Rental Assistance* – In July 2011 the City voluntarily transferred its budget authority and baseline units from the Lakewood Housing Authority to the Housing Authority of Los Angeles County (HACLA) for administration of the program. The City continues to provide information and refers the elderly, large families and lower-income families to this program.
- *Lakewood Housing Strategy* - The Lakewood Housing Strategy has been designed to develop a comprehensive housing program for the portion of Lakewood east of the San Gabriel River. The formulation of a housing strategy for this portion of Lakewood entailed surveying each parcel within the area and determining the condition, occupancy, ownership patterns, housing types, available parking, condition of public improvements, traffic counts, population density, student generation, code enforcement history, fire and public safety concerns and other factors which help describe the quality and state of the housing. This data is being utilized in conjunction with economic statistics on property re-sales and leasing in the area to describe the current state of Lakewood's housing stock. From the data collected, a housing strategy is formulated for the sub-areas of greatest need.
- *Homebuyer Assistance Programs* – The California Housing Finance Agency's Mortgage Credit Certificate (MCC) tax credit program functions as a federal income tax credit that reduces the borrower's potential federal income tax liability. The credit may be used by first-time home buyers to convert a portion of the annual mortgage interest into a direct income tax credit, and therefore lowering the amount of federal taxes the holder of the MCC would have to pay for the duration of the loan. The credit is subtracted dollar-for-dollar from the homebuyer's federal income taxes. Qualified buyers are awarded a tax credit of up to 15 percent and the remaining 85 percent may be taken as a deduction from the income in the usual manner.

This program encourages more owner-occupied housing and provides greater home ownership opportunities for families in Lakewood, particularly those that are low and moderate income. Interested residents go through the normal process of choosing a realtor and arranging financing through a program participating lender.

If the home selected is eligible for the program, the lender applies for the MCC on behalf of the buyer. Home prices, location and other participant restrictions apply.

- *Fair Housing Program* - The City contracts with a fair housing consultant to provide a variety of fair housing services, including education, counseling, dispute investigation and resolution, case referrals, and training. The City reviews the Fair Housing Program quarterly to identify specific areas of need in the City and to focus programs toward meeting these needs.

Moratoriums/Growth Management

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

Development Fees/Assessments

Development fees and taxes charged by local governments also contribute to the cost of housing. In Lakewood, 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. 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.

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 through which residents can voice concerns. Lakewood's commissions and committees are populated by members from the community. The role of these commissions and committees is discussed below. Overall, the City provides for sufficient community representation in the decision-making process of housing-related matters.

Planning and Environment Commission

The Planning and Environment Commission reviews and makes decisions on a variety of land use matters such as subdivisions, conditional use permits, community plans, design reviews, and variances. The Commission also reviews and makes recommendations to the City Council on issues pertaining to the General Plan, Specific Plans, zone changes, annexations, and other policy issues regarding development. The Planning and Environment Commission consists of five members appointed by the City Council to serve two-year terms.

Development Review Board

The Development Review Board (DRB) is composed of an architect, a landscape architect, and the Director of Community Development. The Development Review Board serves as both an advisory and approval body that reviews aspects of project design. The primary goal of the Development Review Board is to ensure that physical property improvement projects are designed and constructed in accordance with the City's high standards of quality. The DRB conducts the review process and applies conditions of approval in a judicious manner so as not to cause undue burden on any development. DRB meetings are informal and open to the public.

Recreation and Community Services Commission

The Recreation and Community Services Commission studies issues related to Lakewood's recreational programs and social services. The Commission consists of five members appointed by the City Council to serve two-year terms. All meetings are open to the public in order to give residents adequate opportunity to voice opinions.

Community Safety Commission

The Community Safety Commission has the responsibility of studying, planning, and recommending appropriate action to the City Council on matters pertaining to traffic, public safety, fire prevention, law enforcement services, public health, animal control, civil defense, and disaster planning and control. All meetings are open to the public in order to give residents adequate opportunity to voice opinions.

Chapter 5

Assessment of Fair Housing Practices

This chapter provides an overview of current fair housing practices in Lakewood. Recent fair housing complaints, violations, and suits are evaluated to determine trends or patterns of impediments to fair housing in the City.

5.1 Fair Housing Practices of Realtors and Other Housing Associations

A number of professional organizations for housing services are engaged in the maintenance and furthering of fair housing choices. These include real estate associations and apartment associations. This section provides an overview of the fair housing commitments of these organizations and the services they provide to promote the awareness of fair housing among its membership.

Real Estate Associations

On December 6, 1996, HUD and the National Association of Realtors (NAR) entered into a Fair Housing Partnership. The partnership requires HUD and NAR to develop a Model Affirmative Fair Housing Action Plan for use by members of NAR to satisfy HUD's Affirmative Fair Housing Marketing regulations. The NAR has developed a Fair Housing Program to provide resources and guidance to Realtors in ensuring equal professional services for all people.

Fair Housing Declaration

The term "realtor" identifies a licensed professional in real estate who is a member of the NAR. Not all licensed real estate brokers and salespersons are members of the NAR. However, realtors who are members of NAR must pledge to conduct business in keeping with the spirit and letter of the Code of Ethics. Specifically, Article 10 of the Code of Ethics obligates realtors to affirmatively further fair housing as follows:

REALTORS® shall not deny equal professional services to any person for reasons of race, color, religion, sex, disability, familial status, national origin, sexual orientation, or gender identity. REALTORS® shall not be parties to any plan or agreement to discriminate against a person or persons on the basis of race, color, religion, sex, disability, familial status, national origin, sexual orientation, or gender identity. (Amended 1/23)

REALTORS®, in their real estate employment practices, shall not discriminate against any person or persons on the basis of race, color, religion, sex, disability, familial status, national origin, sexual orientation, or gender identity. (Amended 1/23)

Article 10 is a firm statement of support for equal opportunity in housing. In accordance with Article 10, Code of Ethics, each realtor must uphold the following pledge:

- **Standard of Practice 10-1**

When involved in the sale or lease of a residence, REALTORS® shall not volunteer information regarding the racial, religious or ethnic composition of any neighborhood nor shall they engage in any activity which may result in panic selling, however, REALTORS® may provide other demographic information. *(Adopted 1/94, Amended 1/06)*

- **Standard of Practice 10-2**

When not involved in the sale or lease of a residence, REALTORS® may provide demographic information related to a property, transaction or professional assignment to a party if such demographic information is (a) deemed by the REALTOR® to be needed to assist with or complete, in a manner consistent with Article 10, a real estate transaction or professional assignment and (b) is obtained or derived from a recognized, reliable, independent, and impartial source. The source of such information and any additions, deletions, modifications, interpretations, or other changes shall be disclosed in reasonable detail. *(Adopted 1/05, Renumbered 1/06)*

- **Standard of Practice 10-3**

REALTORS® shall not print, display or circulate any statement or advertisement with respect to selling or renting of a property that indicates any preference, limitations or discrimination based on race, color, religion, sex, disability, familial status, national origin, sexual orientation, or gender identity. *(Adopted 1/94, Renumbered 1/05 and 1/06, Amended 1/23)*

- **Standard of Practice 10-4**

As used in Article 10 “real estate employment practices” relates to employees and independent contractors providing real estate-related services and the administrative and clerical staff directly supporting those individuals. *(Adopted 1/00, Renumbered 1/05 and 1/06)*

- **Standard of Practice 10-5**

REALTORS® must not use harassing speech, hate speech, epithets, or slurs based on race, color, religion, sex, disability, familial status, national origin, sexual orientation, or gender identity. *(Adopted and effective November 13, 2020, Amended 1/23)*

Diversity Certification

The NAR has created a diversity certification, “At Home with Diversity” to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR “At Home with Diversity” course. The certification assists in the development of increased awareness of cultural and personal biases that may inhibit a realtor for fully embracing diversity and creating a successful multicultural real estate business. It also assists in learning inclusive, multi-cultural marketing and advertising strategies to broaden client base, and to formulate an inclusive business plan to help you create an enduring business that is able to adapt and evolve to an ever-changing marketplace. The coursework provides valuable business planning tools to assist real estate professionals in reaching out and marketing to a diverse housing market. The NAR course focuses on diversity awareness, building cross-cultural skills, and developing a business diversity plan. In July 1999, the NAR Diversity Program received the HUD “Best Practices” award.

California Association of Realtors (CAR)

The California Association of REALTORS® supports a diverse, 200,000+ member community and the diverse communities that those REALTORS® serve. They are committed to protecting and expanding the opportunity for all communities to sustainably own, use and transfer real property. Even with long-standing state, federal and local laws prohibiting discrimination, many communities remain segregated and housing discrimination and barriers to equal housing opportunity persist for communities of color, women, people with disabilities, members of the LGBTQ+ community and other marginalized communities.

Good fair housing practices are essential for a compliant and professional real estate business. REALTORS®, as the first point of contact for many home buyers and sellers can make a huge difference in someone’s homeownership journey. With underserved communities facing additional homeownership challenges and racial homeownership gaps that remain stubbornly large; REALTORS® as stewards of homeownership, can make a huge difference. The CAR has created fair housing and anti-discrimination effort with the following initiatives:

REALTOR® Education and Training

To properly address fair housing issues, we must first understand them. Much of this history is not taught in schools, nor is it fully explained in most existing REALTOR® licensing and continuing education courses. We are learning more about how unconscious bias impacts the real estate industry, including in REALTOR® behavior, and issues with lending and appraisals; and how the legacy of past and current discrimination compounds, leaving underrepresented communities struggling to compete in California’s tough housing markets. That’s why it’s imperative that we learn more about past and current fair housing challenges to ensure that our REALTOR® community is taking an active role in addressing these issues and ending the terrible legacy of discrimination.

Legislative

CAR is supporting and co-sponsoring legislation that will advance homeownership and provide affordable housing for underrepresented communities, such as veterans, disabled individuals, seniors, communities of color and the LGBTQ+ community. Some of these efforts include sponsoring legislation to require that all real estate licensees take implicit bias training and to make the current fair housing training more robust and relevant. CAR is co-sponsoring legislation to mask or redact illegal restrictive covenants in real property records and co-sponsoring legislation to repeal Article 34 in its entirety.

Member Task Force

CAR leadership has established a Fair Housing and Diversity Task Force of members that is evaluating educational, diversity and leadership development initiatives, fair housing law enforcement policy, and CAR governance structure to support the Association's strong commitment to fair housing and diversity within California's housing market and real estate industry. CAR leadership has adopted the Task Force recommendations to create two new Committees of the Board of Directors for fair housing and diversity and a member-led forum to help raise member awareness about fair housing policy and diversity in real estate businesses and industry leadership.

Transaction Support

CAR supports the REALTOR® community with advisories and forms that can be used when working with clients. CAR provides Fair Housing and Discrimination Advisory form (FHDA) and an on-line a tool to help REALTORS® and their clients better understand fair housing law and best practices.

Homebuyer Programs

Due to past redlining and other exclusionary and discriminatory practices, communities of color have not had equal access to the wealth-building benefits of homeownership. Therefore, buyers who have lower down payments and less access to intergenerational wealth can benefit from down payment assistance programs. CAR supports home buyer assistance programs and has increased fundraising for its Housing Affordability Fund, which funds low- to middle-income homebuyer assistance programs. Additionally, CAR educate REALTORS® working with first-time buyers about down payment and homebuyer assistance programs.

Pacific West Association of Realtors

The Pacific West Association of Realtors serves realtors in Lakewood and surrounding communities, including Long Beach, La Mirada, and several communities in Northern Orange County. The Pacific West 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 agency. The Association also has trained mediators on staff that provide extensive mediation services for

unresolved issues relating to financial disputes and fair housing issues. Realtors with fair housing questions, or who are in need of additional information, are usually referred to the California Association of Realtors. The Pacific West Association of Realtors also provides resource information on ethics and standards of practice.

California Department of Real Estate (DRE)

The California Department of Real Estate (DRE) is the licensing authority of real estate brokers and salespersons. 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. In order to renew a real estate license, each licensee is required to complete 45 hours of continuing education courses, 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 any discriminatory practices when providing real estate services to clients.

California Department of Consumer Affairs

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 Department also protects professionals from unfair competition by unlicensed practitioners.

The Department of Consumer Affairs 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 Department of Consumer Affairs 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.

Apartment Associations

The California Apartment Association 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 Lakewood.

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 California Apartment Association 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.*

The Apartment Association of Greater Los Angeles (AAGLA) serves all of Southern California and has approximately 14,000 members. The Association 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, the Association 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.

Apartment Association - California Southern Cities

The Apartment Association - California Southern Cities serves the City of Long Beach and the surrounding communities, including Lakewood. Similar to the other apartment associations throughout the region, the Apartment Association - Southern California

Cities provides seminars, workshops, information, and training to members on a variety of topics, including fair housing.

5.2 Fair Housing Services

This section provides an overview of the fair housing services available to Lakewood residents, as well as an analysis of recent fair housing complaints, violations, and suits to determine trends or patterns in the City. Typically, fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling services involves informing landlords and tenants of their rights and responsibilities under the California Civil Code and mediating conflicts between tenants and landlords.

Fair Housing Consultants, Inc.

The City contracts with Fair Housing Consultants, Inc. to provide fair housing services to residents. Fair Housing Consultants Inc. is highly dedicated to promoting equal housing opportunity, has provided fair housing services to the City since 1999. Services include education and outreach materials, fair housing training, complaint services, complaint processing, tenant/landlord mediation, and case referral. This section includes a detailed description of the services provided by Fair Housing Consultants, Inc.

Fair Housing Complaints, Violations, and Suits

Fair Housing Consultants, Inc. received three housing discrimination complaints during FY 2018-2019, with four pertaining to racial discrimination and one based on familial status. Fair Housing Consultants referred all three cases to DFEH for further investigation after consulting with the clients.

Landlord/Tenant Services

Table 5-1: Landlord/Tenant Services FY 2023-2024

Type of Complaint	Number
Eviction	42
Security Deposit	35
Rent Increase	56
Repairs	59
Harassment	4
Rental Terms	2
Mail Landlord/Tenant Handbook	37
Referral to Section 8	53
Code Enforcement	17
Total	305

Source: Fair Housing Consultants, October 2024

5.3 Hate Crimes

Hate crimes are crimes that are committed because of a bias against race, religion, disability, ethnicity, or sexual orientation. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting Program collects statistics on these incidents. According to the FBI, there were 63 reported hate crimes in Lakewood from 2004 to 2023, with an average of 3.15 hate crimes per year during that 20-year period.

Table 5-2: Hate Crimes in Lakewood 2004-2023

Year	Race	Religion	Sexual Orientation	Ethnicity	Disability (1)	Gender (2)	Gender Identity (2)	Total
2004	6	0	1	1	0	0	0	8
2005	6	1	1	0	0	0	0	8
2006	3	0	0	0	0	0	0	3
2007	3	1	0	0	0	0	0	4
2008	2	0	0	3	0	0	0	5
2009	2	0	1	0	0	0	0	3
2010	2	1	1	0	0	0	0	4
2011	1	0	0	0	0	0	0	1
2012	3	0	0	0	0	0	0	3
2013	2	0	0	0	0	0	0	2
2014	0	0	0	0	0	0	0	0
2015	2	0	0	0	0	0	0	2
2016	3	0	1	0	0	0	0	4
2017	7	0	0	0	0	0	0	7
2018	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0
2020	0	0	1	0	0	0	0	1
2021	2	0	0	0	0	0	0	2
2022	4	0	0	1	0	0	0	5
2023	1	0	0	0	0	0	0	1
Total	49	3	6	5	0	0	0	63

Source: Federal Bureau of Investigation website: <https://www.fbi.gov/news/press-releases/fbi-releases-2023-crime-in-the-nation-statistics>

Chapter 6

Identification of Impediments and Actions

The City of Lakewood is committed to ensuring equal access to housing for all residents. Based on the analysis described previously in this report, the City has made several findings regarding issues that influence equal access to housing. This section presents the findings, and contains recommendations and actions designed to address the findings.

6.1 Findings

Demographic Characteristics

Changes in the demographics of a community can influence equal access to housing. The City has become more racially and ethnically diverse since 1990, with the proportion of Asian, African American, and Hispanic residents increasing, while the proportion of White residents has decreased. Changing racial and ethnic characteristics may influence fair housing issues to the extent that certain racial and ethnic groups may experience discrimination in the housing market due to factors such as color, language spoken, or other cultural factors.

Household and Housing Characteristics

Household type and size, income level, the presence of persons with special needs, housing price, and household characteristics may affect a household's access to housing. The following household and housing characteristics are prominent in the City.

- Household size increased from 2.81 persons per household to 2.95 persons per household during the 1990s. Since then, the average household size in Lakewood has grown with the City's population, and as of 2018, the estimated average household size has increased to 3.10 persons. This indicates an increase in families with children in the community. An increase in household size can contribute to fair housing issues in the sense that large household sizes and the presence of children may make landlords wary of renting to certain households.
- As shown in Table 2-6, African American and American Indian or Native Alaskan households have a larger proportion of lower and moderate income households than White or Asian households; therefore, housing affordability issues disproportionately affect these groups.

- The number of housing units in the City has remained relatively stable, increasing by less than 4% since 1990. The limited increase in housing units coupled with the population increase led to a tight housing market, which may result in increased fair housing issues as some landlords could potentially afford to be discriminatory in selecting tenants.
- Overcrowding is relatively low in the City but is prominent among large households (five or more members). Not only does overcrowding create problems for those families living in inadequately sized units, overcrowding also results in greater and more rapid deterioration of homes than would otherwise occur. As a result, some landlords or apartment managers may be more hesitant about renting to larger families, thus making access to adequate housing even more difficult.
- As of December 2024, the median price for homes in the City was approximately \$855,177 which is affordable only to above-moderate income households. Lower and moderate income households are essentially priced out of the homeownership market. A majority of rental units are affordable to low and moderate income households.
- A majority of housing units in the City are more than 50 years of age. Most residential structures over 30 years of age typically require minor repairs and modernization improvements. Though the housing stock is generally in good condition, an increase in the number of units requiring rehabilitation is likely given the age of the structures.
- Housing cost burden is prevalent among elderly renters and large households. More often than not, housing cost is disproportionately burdening the most vulnerable members of the community. Therefore, maintaining a reasonable level of housing cost burden is an important goal of Lakewood.
- A majority of community facilities and employment centers in the City are easily accessible using public transportation. MTA, Long Beach Transit, and OCTA all provide bus service in the City. The City's DASH system and Long Beach Transit's Dial-A-Ride provide transportation options to disabled and elderly persons. The relationship between public transit, job centers, and affordable housing does not impede Fair Housing Choice in Lakewood because persons who depend on public transit are not limited as to where they can live due to the access provided in the City.

Access to Home Purchase and Home Improvement Financing

An essential aspect of fair housing choice is equal access to credit for the purchase or improvement of a home. The analysis of lending patterns in the City reveals the following issues:

- The number of applications submitted varied by race. A review of the data found that White applicants were the largest group to submit applications (363 or 38.7%). Whites were the largest group approved (25.2%) but also the largest group denied (3.9%). Followed by Asians with 139 applications. Asians were the second largest group approved (9.2%) and denied (1.2%). American Indians or Native Alaskans were the smallest group to submit applications (2). American Indians or Native Alaskans were the smallest group to be approved (0.1%) and 0% denied. A total of 33 (3.5%) applications were submitted by African Americans. The approval rate for African Americans was 2.3% while the denial rate was 0.3%. This reveals that not only is there a larger population Whites but also that White applicants had more equity, income, or other assets to obtain a conventional loan than other races. It should be noted that there were 348 applications submitted with information not provided, which is just over a third of all applications. 155 or 16.5% of those applications were approved, 21 or 2.2% were denied.
- Approval rates for Hispanic or Latino loan applicants were 14.4% and for Non-Hispanic or Latino applicants the rate was 28%. The difference is nearly 50%, which is a significant difference between these two ethnic groups. 314 applications submitted did not include ethnic information, which is just over a third of all applications submitted. Of those applications, 137 (14.6%) were approved and 18 (1.9%) were denied.
- Among the racial groups, those applicants that identified of being two or more races had the lowest approval rates (0%) in three lowest income categories. Among applicants earning more than 120 percent of MFI, most applicants have approval rates over 25% with the exception of American Indian or Alaska Native. Native Hawaiian/Pacific Islanders and Native Americans or Alaska Native had an approval rate of 100 percent for the 80-100 percent MFI category.
- The top three lenders in Lakewood, Rocket Mortgage, United Wholesale, and SchoolsFirst, have highest approval rates (origination) of the top 10 lenders. Together, these three lenders have approved just over half of all approved loans. All of the top ten banks had denial rates of less than 12% percent.
- Relative to conventional loans, government-assisted loans had a 46.2% approval rate. Overall, government-assisted applications accounted for 23.2% of all home purchase applications in Lakewood.

Public Policies and Programs

Public policies and programs can affect the availability of housing choice. To ensure that City policies and programs promote equal housing opportunities, the City has reviewed all housing policies and programs and has identified the following potential fair housing issues:

- *Definition of a family* - The Zoning Code contains a definition of a family. While the definition does not appear to be restrictive, the City may consider removing this definition to avoid the impression of restrictiveness.
- *Density Bonus* – The City currently allows density bonuses when requested by developers. The City continues to promote density bonus provisions for residential development projects. In conjunction with implementation of the Housing Element, the City has amended the Municipal Code to conform to State law allowing density bonuses for residential development projects.

6.2 Actions to Further Fair Housing Choice in Lakewood

The preceding sections of the AI have reviewed background information, analyzed lending data, assessed the fair housing services, and provided findings of potential impediments in the City. The paragraphs below set forth the City's actions to further access to fair housing for all Lakewood residents.

Expanding Affordable Housing Opportunities

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, Hispanic and African American households are disproportionately impacted by lower and moderate incomes, and therefore have fewer housing options than other racial/ethnic groups. The following actions will assist the City in expanding affordable housing opportunities for City residents.

1. Homeownership Assistance

Action 1.1: The City will continue to provide and expand home ownership opportunities for low and moderate income households. Specifically, the City will explore the use of different funding programs to assist households with income between 80 and 100 percent of County MFI. This group has the most difficulty in obtaining conventional home purchase financing.

Time Frame: Ongoing

2. Rehabilitation Assistance

Action 2.1: The City will continue to provide and expand assistance for low income households in meeting the housing rehabilitation needs. Specifically, the City will explore the use of different funding programs to assist households with income between 80 and 100 percent of County MFI. This group has the most difficulty in obtaining conventional home improvement financing.

Time Frame: Ongoing

3. Section 8 Rental Assistance

Action 3.1: The City will continue to provide information and refer the elderly, large families, and lower-income families to Housing Authority of Los Angeles County (HACoLA) for assistance with the Section 8 program.

Time Frame: Ongoing

4. Affordable Housing Resources

Action 4.1: The City will identify and pursue other funding sources for the development of affordable housing.

Time Frame: At least once a year, assess the feasibility of applying to different funding programs.

Public Policies and Programs Affecting Housing Development

The City has identified several public policies and programs that have the potential to restrict equal access to housing. However, many City programs, including programs contained in the General Plan Housing Element, contain actions that actively promote equal access to housing. As a City committed to ensuring Fair Housing Choice for all residents, the City has identified the following actions:

5. Incentives for Affordable Housing Development

Action 5.1: The City will continue to provide financial and development incentives to owners or developers of multi-family housing to set aside units that are affordable to low and moderate income residents.

Time Frame: Ongoing

6. Housing Element Update

Action 6.1: The City will continue to implement the policies and program identified in the certified Housing Element.

Time Frame: Ongoing through 2029

Access to Financing

The analysis of lending data revealed that significant differences exist in the approval rates of loans by the race of the applicant. The City will take the following actions to improve access to financing for residents.

7. Outreach to Lenders

Action 7.1: The City will contact local lenders with homebuyer assistance programs to explore ways to expand participation by potential homebuyers.

Time Frame: Ongoing

Action 7.2: The City will work with local lenders and government institutions, such as Fannie Mae, to provide information about government-backed financing for low and moderate income residents. The City will encourage local lenders to provide information in both English and Spanish.

Time Frame: Ongoing

8. Education and Resources

Action 8.1: The City will encourage workshops to be held in Lakewood by local lending institutions and Fair Housing Consultants regarding the home loan process and the resources available to low and moderate income homebuyers. The City will encourage local lenders and Fair Housing Consultants to hold workshops in both English and Spanish.

Time Frame: Conduct a homebuyer workshop at least once a year.

Action 8.2: The City will provide brochures or information on homeownership, rental assistance, and rehabilitation assistance programs in English and Spanish.

Time Frame: Ongoing

9. Unfair Lending Practices

Action 9.1: The City will work with Fair Housing Consultants to monitor complaints regarding unfair lending, and assess lending patterns using the Home Mortgage Disclosure Act Data (HMDA) and other data sources.

Time Frame: Monitor HMDA and other data at least once a year to identify potential issues with unfair lending practices.

Action 9.2: The City and Fair Housing Consultants will participate with HUD and other efforts in investigating predatory lending in the home purchase, home improvement, and mortgage refinancing markets.

Time Frame: Ongoing

Action 9.3: Periodically, the City will use *Lakewood Living*, the City newsletter, or other media to alert residents of predatory lending practices, or other unfair lending practices that surface in the City.

Time Frame: Ongoing

Public Outreach

10. Fair Housing Services

Action 10.1: The City will continue to distribute information regarding the services provided by Fair Housing Consultants. The City will provide a description of the services on the City website.

Time Frame: Ongoing

Action 10.2: Fair Housing Consultants will continue conducting fair housing workshops for residents, real estate professionals, apartment owners, and property managers. Specific efforts should be made to expand community participation and increase a greater awareness among property owners and managers.

Time Frame: Ongoing

Action 10.3: Fair Housing Consultants will continue to work with the local boards of realtors to distribute fair housing information to member agencies in Lakewood.

Time Frame: Ongoing

Chapter 7

Signature Page

I, Todd Rogers, hereby certify that this Analysis of Impediments to Fair Housing Choice for the City of Lakewood represents the City's conclusions about impediments to fair housing choice, as well as actions necessary to address any identified impediments.

Todd Rogers, Mayor
City of Lakewood

June 10, 2025

Date