THE PIVOTAL ROLE OF MUNICIPALITIES IN PROMOTING SOCIAL EQUITY
WITHIN ETHNIC MINORITY COMMUNITIES

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Ja'londa S. Watson
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AUTHOR: Ja’londa S. Watson

DATE SUBMITTED: Fall 2023

Department of Political Science

Dr. Laureen Hom
Thesis Committee Chair
Professor of Political Science

Dr. Brady Collins
Professor of Political Science

Dr. Renford Reese
Professor of Political Science
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ABSTRACT

This thesis investigates the pivotal role municipalities play in promoting social equity within ethnic minority communities. Historically, ethnic minorities have been subjected to numerous social challenges because they do not possess the necessary political capital to facilitate social change. Since public administrators can facilitate public policies, they have a duty to implement policy initiatives that advocate for marginalized populations.

The COVID-19 pandemic has significantly exacerbated housing inequalities for ethnic minorities including African-Americans; therefore, research needs to be conducted to determine whether current housing policies effectively promote social equity and stakeholder engagement. Utilizing elite interviews, documents, and observations as the research methods, my study examined the relationship between the adverse housing outcomes for local stakeholders and the housing initiatives that city officials implemented on behalf of the municipality.

My findings denoted that local community leaders and city housing officials held divergent perspectives about the city’s initiatives to address its ongoing housing issues. My analysis revealed that preconceived notions among the two groups impeded discussions about social equity for African-American residents. Additionally, the COVID-19 pandemic has created communication barriers that hindered the equal exchange of insights regarding the city’s housing element process.

I conclude that it is the responsibility of municipalities to ensure that their community engagement strategies effectively reach marginalized stakeholders, and I ultimately recommend that municipalities start instituting Community Benefits Agreements (CBA) as essential components of each local government’s public policy process.
# TABLE OF CONTENTS

COMMITTEE MEMBERSHIP......................................................................................ii

ACKNOWLEDGEMENTS.........................................................................................iii

ABSTRACT..............................................................................................................iv

LIST OF TABLES....................................................................................................vi

CHAPTER 1: INTRODUCTION.................................................................................1

CHAPTER 2: LITERATURE REVIEW.................................................................3

CHAPTER 3: METHODOLOGY..............................................................................17

Data Collection.....................................................................................................17

Data Management & Analysis.............................................................................20

Data Collection Limitations.................................................................................21

Ethics: Relationship to the Field & Positionality..............................................21

CHAPTER 4: OVERVIEW OF THE CASE..........................................................23

Housing Characteristics......................................................................................27

Housing Needs Determinations.........................................................................32

CHAPTER 5: FINDINGS.......................................................................................34

CHAPTER 6: CONCLUSION................................................................................44

Future Research Recommendations...............................................................46

Policy Recommendations..................................................................................46

REFERENCES.....................................................................................................48

APPENDIX..........................................................................................................52
LIST OF TABLES

Table 1: Southern California Association of Governments (SCAG) 6th Cycle Timeline……26
Table 2: SCAG Regional Housing Needs Assessment (RHNA) Totals by County…………27
Table 3: City of Inglewood Housing Units by Year Structure Built………………………28
Table 4: City of Inglewood Housing Types…………………………………………………28
Table 5: City of Inglewood Housing Tenure by Year Moved to Current Residence……29
Table 6: City of Inglewood Housing Tenure…………………………………………………29
Table 7: City of Inglewood Cost Burden by Income………………………………………30
Table 8: City of Inglewood Spending on Rent by Income…………………………………31
Table 9: City of Inglewood Cost for Mortgage Holders by Income……………………31
Table 10: City of Inglewood Extremely Low-Income Housing Needs…………………..32
Table 11: City of Inglewood Final 6th Cycle Housing Needs Allocation…………………33
CHAPTER 1: INTRODUCTION

A core goal of public administration is to enact policies that support the welfare of local stakeholders. As communities grow increasingly ethnically and racially diverse, municipalities face challenges in fulfilling the demands of various community members in a deliberate and conscientious manner. According to scholars, it is essential for public administrators to exhibit cultural relativism, the idea that a person’s beliefs and practices should be understood based on that person’s own culture, as they evaluate the challenges exclusive to minority populations to address each community’s specific social issues appropriately. Jill K Clark (2018) provides a theoretical framework explaining the correlation between public managers’ perceptions of social equity and the design choices utilized to increase public participation. According to Clark, “designers” of public participation need to take a step back from problem-solving to first consider the role of cultural humility, then engage in problem-solving to codesign public participation opportunities.

The City of Inglewood California, located in the southwestern portion of Los Angeles County, is a well-known hub for the region’s African-American population. From its incorporation back in 1908 until now, city officials have attributed the city’s rapid growth to the “enhance the residential quality of life in our community, the economic vitality of our businesses and entertainment of our visitors”. As the city continues to grow and develop, however, the African-American population in Inglewood has decreased significantly (Othering & Belonging Institute, 2020) While direct displacement caused by the demolition of public housing projects has forced many long-term African-American residents to seek housing elsewhere, indirect displacement caused by increasing rents has forced many low-income African-American residents to seek housing outside of the city’s vicinity.

The COVID-19 pandemic has exacerbated the housing, economic, and overall social disparities for ethnic minority groups; therefore, it’s imperative to further analyze how certain
policy initiatives can manifest into the disenfranchisement of ethnic minorities. Using the
City of Inglewood California as a case study, this study seeks to answer the following
research question: How does the City of Inglewood 2021-2029 Housing Element promote
social equity for African-American residents? How effectively and equitably did the city
engage with its diverse stakeholders in developing its Housing Element? With this study, I
use qualitative research methods to capture the perspectives of key stakeholders in the City of
Inglewood. This study explores the ways housing policy initiatives can produce varying
outcomes for marginalized individuals and whether they adequately promote social equity for
its African-American resident population.
CHAPTER 2: LITERATURE REVIEW

In contrast to the white majority, ethnic minority groups are more susceptible to discriminatory actions that contribute to racial inequality and are less capable of overcoming the systematic obstacles that inhibit their upward social mobility. While many discussions about racial inequality primarily focus on closing the racial wealth gap to promote social equity, they tend to overlook the significance of housing in achieving economic security and building intergenerational wealth (Bowdler & Harris, 2022).

Historically, African Americans in the United States have experienced discrimination in housing. Starting in the 1930s, practices like redlining have imposed detrimental effects on African Americans and their ability to secure stable housing. Policies like the Housing Act of 1949 and The Community Reinvestment Act of 1977 were enacted to facilitate more opportunities for African Americans to secure stable housing; however, the discriminatory housing practices persisted, and African Americans were left with no other recourse than to gravitate toward geographic regions where securing stable housing was more feasible (Habitat for Humanity, n.d.)

To comply with current federal and state housing policies, local governments must work diligently to address each community’s housing needs. In addition to adopting plans and regulatory systems, many local governments have relied on urban renewal, the method of economically revitalizing impoverished areas, in order to produce more opportunities for affordable housing development. But for low-income communities that are predominately inhabited by African Americans, urban renewal has had devastating consequences—including displacing more than a million people from their homes (Schwab, 2018).

This literature review will discuss three key themes of interest that have disenfranchised African-Americans in the United States housing system. The three key themes are the government-initiated destruction of public housing developments, the
commercialization of cityscapes during reconstruction, and the impact of public engagement in city planning efforts.

**Government-Initiated Deconstruction of Affordable Public Housing Developments**

When municipalities dedicate funding towards deconstructing and revitalizing impoverished areas throughout their city, this grants city officials the opportunity to invest into providing more public goods, like affordable public housing developments, to the citizens they have a duty to serve. While city officials intend for this to be a proactive way of addressing ongoing housing issues, a major caveat of pursuing any large-scale capital project is that the completion timeline is often extensive, and it can take several years until long-term renewal improvements can be accessed by the public. Since affordable public housing units have been conventionally occupied by African-Americans of lower socioeconomic statuses, the destruction of entire affordable public housing developments has had a direct negative impact on African-American tenants, especially those residing in large metropolitan cities. Despite the initiatives enacted to aid impacted residents in their relocation, these expectations were left unfilled, and many African-American residents were left displaced.

In their research which focused on the effects of public housing demolition on African-Americans in large US cities, Goetz (2011) studied the relocation patterns of African-American residents after the implementation of revitalization projects. To examine the migration of African-Americans caused by state-funded urban revitalization, Goetz analyzed data from 139 of the largest central cities in the U.S. from the years 1996 until 2007. By utilizing this statistical data and a list of public housing projects obtained from the Department of Housing and Urban Development, they discovered that 394 public housing projects were demolished and these projects accounted for approximately 163,393 units of public housing (an average of 415 units per project). Based on the occupancy and
residential information available, 110,227 units were occupied before any revitalization projects, and an estimated 239,844 people were displaced after demolition. It was revealed that most households that were directly displaced by public housing demolitions across the country were low-income African-Americans. While Goetz highlighted the HOPE VI project as a prime example of how urban revitalization stimulates to widespread displacement, they noted that public housing authorities in cities like Chicago, Atlanta, Memphis, New Orleans, and Las Vegas have anticipated or current plans to demolish most of their public housing to actualize their economic development strategies.

Werkneh (2018) contributes to this discussion on the effects that public housing demolition has on African-Americans as they illustrate how the influx of economic redevelopment has led to the displacement of many communities – particularly those made up of low-income African-Americans. Werkneh uses Harlem as an example - a city once known as the Mecca for its prominent black art, culture, and resident population – to show how the city played a direct role in the neighborhood’s changing economic and racial geography. Werkneh explains that many cities, like Harlem in this case, have asserted their eminent domain authority to overtake neighborhoods deemed to be areas of blight in the name of economic development. They also note that state actors who are incentivized by future prospective economic outcomes undertake eminent domain actions that displace low-income minority communities. Although the taking of property for the use of public use and economic development requires that residents be compensated to aid in their relocation efforts, most residents are not justly compensated for the impact the displacement has had on their ability to secure stable housing within the city’s vicinity. As a result, displaced low-income residents, specifically African-American residents, are forced to seek out affordable housing that is often further away from their neighborhoods of origin. Furthermore, African-Americans who have been forced out of their neighborhoods of origin may not even be able
to reap any of the social benefits once an economic development capital project is finally completed because they may no longer have the ability to return as residents within the local community.

While scholars have noted the past urban renewal period (1949-1974) as the period in which low-income African-Americans were the most affected by the initiation of urban renewal, emerging research has noted that the contemporary urban renewal period (1992-2007) continues to displace low-income African-American yet does so exponentially due to certain distinct differences. Hyra (2012) provides the scholarship with a comparative historical approach detailing the specific ways public housing deconstruction and urban renewal developments in the contemporary urban renewal period have exacerbated the housing needs for low-income African-American residents. To show the extent to which inner city neighborhood redevelopment has disrupted impoverished black communities and displaced hundreds of thousands of African-Americans, Hyra compared the outcomes of the federal Housing Act of 1949 to the outcomes of more extensive federally funded programs, like HOPE VI; they use previously studied cases including Chicago, New York and Washington D.C. to conduct this comparison. Most notably, they emphasize the former as establishing the initial ghettos where low-income African-Americans were displaced from their blighted communities, and the latter as establishing the “second ghettos” where low-income African-Americans continued to be displaced but mainly because they were living below the poverty line within the inner city and weren’t granted resources to retain affordable housing after the deconstruction of their prior public housing residences.

When Hyra concludes this comparison by stating the distinct ways contemporary urban renewal differs from past urban renewal, he lists the following reasons as to why current, as well as future contemporary urban renewal, will continue to afflict low-income African-American communities: (1) new urban renewal is a central business district strategy,
(2) new urban renewal involves an interaction between race and class, and (3) new urban renewal is associated with rising suburban poverty. To a large degree, government-initiated deconstruction of affordable public housing developments has dismantled low-income African-American communities and will continue to do so if more public housing units are demolished in the future.

**Commercialization of Cityscapes During Reconstruction**

Of course, a municipality dedicating funding towards deconstructing and revitalizing impoverished areas throughout its city can be perceived as a consideration for the social needs of the greater good. However, deconstructing impoverished areas destroys the physical spaces inhabited by low-income community members while revitalizing impoverished areas tends to disregard low-income community members entirely because the reconstruction of the cityscape is commercialized in a way that aims to attract community members of higher-incomes levels. Although municipalities have always been challenged with balancing the city’s capitalistic endeavors with its civil duties in an equitable, conscientious manner, capitalistic endeavors nevertheless tend to be prioritized over the civil duties which require municipalities to act appropriately on behalf of community members who rely on the city to take the initiative in resolving ongoing issues like housing. As numerous scholars have already emphasized in their research, urban renewal oftentimes appears to cater to individuals of moderate-income levels as opposed to low-income African-American residents who do not have the ability to afford housing, their most basic, essential necessity Goetz, 2011; Werkneh, 2018; Hyra, 2012.)

Municipalities have justified the overt commercialization of cityscapes by stating that investing into public amenities, such as shopping centers and sports facilities, has proven to be significantly lucrative and has given cities the financial ability to invest into improving their local communities. But to the dismay of many low-income African-American
communities, commercialization disrupts these communities by stimulating an increase in property values, which ultimately creates increases in rent costs, no longer making them affordable for residential and business tenants. In their study, Smith (1982) contends that it is necessary to understand the origins of the present redevelopment process to properly assess the future of the inner city along with its long-time residents who will be affected in the process. Smith starts their literature with historical context about how urban theory promoting urban redevelopment with underlying gentrification is a guiding principle in many municipality’s redevelopment processes due to the inherent structures of capitalism in American society. Specifically, they state that this understanding emerges from the necessity for economic expansion in a capitalist society where survival requires expansion - the accumulation of larger quantities of capital. They then reference the South Bronx in New York to exemplify the way in which low-income African-American communities are dismantled over time due to changes in the inner-city housing market. While there are other factors that impact the supply and demand of inner-city housing, income constraints are the main factor that leaves African-American residents less able to pay exponentially higher rents caused by gentrification. Ultimately, Smith shows that equalization and differentiation among various places in metropolitan regions are determined by “ground rent” denoting that the more desirable spaces are typically occupied by moderate-income Whites and any remaining less desirable spaces are typically left behind for low-income African-Americans.

Compared to their White counterparts, African-Americans are disproportionately burdened by their lower socioeconomic status, which in turn lowers their potential of advancing their upward social mobility. Particularly for low-income African-Americans residing in urban neighborhoods where gentrification is rampant, the financial impacts in the form of significantly inflated housing costs impact the livelihood of many African-American communities. With their own research, Christafore and Leguizamon (2019) expand on
previous research describing how gentrification alters racial and income composition, thus perpetuating income segregation within neighborhoods. In their study, Christafore and Leguizamon examined how the influence of gentrification, with respect to changes in income inequality at the neighborhood level over time, may spill over into surrounding neighborhoods as lower-income households' location choices change. First, they obtained census tract level data on the 30 largest Core Based Statistical Areas (CBSAs) in the United States from GeoLytics; the data ranged from the years 2000 until 2010 and included various cities that have experienced moderate or extreme gentrification during the time. Next, they evaluated the various CBSAs by employing a specific model form and utilizing controls that have been shown to influence inequality; they also utilized demographic variables to find correlations between the level of inequality encountered by neighbors. Finally, they implemented the data from the CBSAs and analyzed the data by employing a strong definition of gentrification. Atlanta, Baltimore, Chicago, Detroit, Los Angeles, and Pittsburgh were just some of the major, predominately African-American cities included, and they noted the extent to which these cities experienced commercial developments over the 10-year period. With this data, Christafore and Leguizamon determined that there is a positive correlation between the spillover influence on low-income households near newly gentrified areas and the escalating commercial development that corresponded with negative consequences like rising house prices.

Surely, observing the housing outcomes for low-income African-Americans across various cities shows that the group has been collectively impacted by the effects of widespread gentrification. But to measure the true extent to which housing outcomes for low-income African-Americans are adversely affected by commercialized reconstruction, one must observe the effects of gentrification on African-Americans residing in densely populated metropolitan areas. Chronopopulos (2020) conducted a study that explored the
relationship between gentrification and racial segregation in Brooklyn, New York with an emphasis on Black Brooklyn. With approximately 788,000 Blacks residing in Brooklyn and almost 692,000 of them living in the area historically known as Black Brooklyn, the high concentration of Blacks serves as a prime example of African-American communities that are prone to urban renewal and have been dismantled over time. In recent decades, Black Brooklyn has undergone pervasive gentrification which has resulted in a significant number of Whites moving into the area, as well as the displacement of an even more significant amount of long-term African-American residents. Specifically, the ongoing commercial developments of luxury apartment buildings and retail storefronts, has expedited the social phenomenon known as “black urban dislocation.” By using maps of Brooklyn obtained from the U.S. Census, and spatial analysis to compare and contrast the Black Brooklyn neighborhood changes from 1970 until 2018, Chronopopulos was able to show readers the distinct racial changes that occurred as time progressed. He illustrated that racial segregation, also known as racial integration, among Blacks and Whites only declined marginally over time because the prominent black resident population transformed into a prominent white resident population over the course of at least 20 years. Between 2000 and 2018 alone, the entire borough of Brooklyn lost 60,878 Black residents. North Black Brooklyn lost 61,886 Black residents. This 20% decline in the African-American resident population in Brooklyn, along with the influx of more than 79,895 Whites, makes it evident that long-term African-American residents have been displaced and infers that these residents have left the area due to increased housing costs.

Income inequality compounded by racial segregation resulting from gentrification has impacted the income and racial composition for many U.S. cities, and impacted the opportunities for low-income African-Americans to secure permanent housing necessary for advancing their upward social mobility. Though policymakers and other public
administrators emphasize the advantageous fiscal rewards of commercialization of cityscapes, they simultaneously underemphasize how these legacy effects manifest into detrimental social consequences for African-American communities.

**Impact of Public Engagement on City Planning Efforts**

Municipalities are certainly responsible for ensuring that all aspects of the public policy process are executed with the utmost regard for citizen’s well-being. But without incorporating effective public engagement strategies into major public policy processes, municipalities will surely overlook the specific needs of underprivileged groups. Particularly for ethnic minority communities, public engagement not only provides municipalities with the opportunity to gain invaluable insights into their community’s ongoing social issues, but it also provides community members with the opportunity to share their concerns with city officials so they can be addressed conscientiously. However, if city officials do not recognize the immense value that public engagement brings and omit it from city planning efforts, then they will equally deprive local governments and disenfranchised community members of the opportunity to collaborate and discover feasible resolutions to their community’s ongoing social issues. Ultimately, public engagement is a vital tool that municipalities can use to mitigate the widespread displacement of marginalized populations.”

While public engagement can be exhibited in a multitude of ways, the National Co-ordinating Centre for Public Engagement (NCCPE) broadly defines the action of public engagement as a two-way process involving interaction and listening, with the goal of generating mutual benefit (*National Co-ordinating Centre for Public Engagement*, n.d.). This definition of public engagement denotes that public engagement is an asset to both city officials and community members during major public policy processes such as city planning. But even more so, public engagement is a vehicle for disenfranchised ethnic minorities, like African-Americans, to reaffirm their equal right to access fair, affordable
housing of their choice. In their scholarly article, Arnstein (1969) articulates how citizen participation empowers disenfranchised communities to exert authority over the inequities and injustices pervading their daily. Before divulging on the various strata of the Ladder of Citizen Participation, Arnstein starts their discussion by establishing the idea that participation in government-related processes is an inherent part of democracy, yet, Mexicans, Puerto Ricans, Indians, and blacks are unjustly deprived of their access to distributive power. They define citizen power as the redistribution of power that enables the have-not citizens, presently excluded from the political and economic processes, to be deliberately included in the future. In order for these have-not citizens to possess true power in future political and economic processes, they must be granted the opportunity to effectively participate, in addition to being granted the opportunity to access redistributive power. Moving onto the Ladder of Citizen Participation, Arnstein shows how the eight rungs of the ladder correspond to the extent of citizens’ power in determining policy outcomes. The bottom two rungs of the ladder describe levels of “non-participation” in which marginalized groups perceive substitutes for genuine participation; the main objective is to enable powerholders to “educate” or “cure” participants. The middle three rungs describe levels of “tokenism” that allows marginalized groups to have a voice through participation but doesn’t allow them the power to facilitate the social change they desire; the main objective is to appease participants while giving powerholders sole authority over decisions made. The top three rungs describe the true extent of “citizen power” in which marginalized groups are given equal access to participate and are also given equal power to facilitate social change; the main objective is for powerholders to engage participants through collaborative efforts so policy outcomes are equitable as possible for all stakeholders. Ultimately, Arnstein illustrates that the types of public engagement strategies implemented by local governments may not necessarily evoke genuine shared decision-making power that disenfranchised ethnic
minorities are under the impression to have and can nonetheless produce varying outcomes for marginalized individuals as a whole.

Since the political actions from State and Federal governments transcend down to municipalities, it is up to local governments officials to ensure that the initiatives that they implement, as well as the subsequent actions they execute, are considerate of all stakeholders in the local communities they serve. In order for local government officials to uphold their duty, they must make a conscious effort to not only engage marginalized community members, but to also dedicate time towards evaluating the effectiveness of current engagement strategies. However, local government officials who fail to fulfil either of these prerequisites can inadvertently jeopardize marginalized community member’s democratic rights and their welfare in the long run. For this reason, it is imperative that local government officials sustain coordination and coherence among a wide variety of actors with different purposes and objectives so that scarce resources are allocated appropriately. Hajnal and Troustine (2010) offer a systematic examination of local government decision making to show how the development, redistribution and allocation of resources are strongly influenced by political imperatives, institutional constraints, and actual needs of local communities. They compiled data from 7,174 cities from the years 1986 until 2001, and evaluated the government spending habits and the different factors that could affect spending decisions. With this data, they focused on the specific spending preferences of each city and paid attention to three main area of local government spending: (a) redistributive, (b) developmental, and (c) allocational. In their analysis, they discovered several critical factors that directly influenced the way local governments made spending decisions based on the three main areas. While Hajnal and Troustine noted political considerations, economic constraints and federalism as core factors that influence overall decisions pertaining to developmental and allocational spending, they also noted that basic needs may influence
decisions pertaining to redistributive spending to a lesser degree. When a measure that considered the size of the local Black population within cities was added, they found that cities with larger Black populations spend significantly less on large-scale redistributive programs. The researchers inferred that less spending on redistributive programs in cities with predominately Black populations is due to racial discrimination and institutional structures, like a city manager form of government, that can reduce responsiveness and redistributive policy choice to low-income residents. Institutionalist scholars have argued that because city managers are nonelected officials who serve as the chief advisors on policy options concerning the wellbeing of the organization, permitting city managers to have so much power over policy reduces the influence that the mass public has over policy, and can more easily ignore the needs of voters. Moreover, pluralist scholars have argued that local government decisions are fundamentally driven by political considerations, and a mayor/council form of government can equally reduce the influence that the mass public has over policy because corruption in democratic processes, like local government elections, can result in elected officials using their power for illegitimate personal gain instead of for the benefit of the public good. Effective public engagement serves as a prerequisite for formulating socially equitable public policies that include considerations for the most vulnerable populations.

As many scholars have previously noted, ethnic minorities have been subjected to a multitude of socioeconomic inequalities including inequalities in education, income, and most notably, housing. In their research, Miller and Gress (2017) assert that it is the responsibility of policymakers and practitioners to ensure that housing policies serve as platforms for individual social and economic mobility and opportunities for equity and inclusion. It is evident that low-income African-American residents living in gentrified neighborhoods rely on local government officials to advocate for the nonpartisan public
housing policies that are needed to protect the welfare of individuals, families, and communities. But despite housing being a pervasive, long-standing social issue among cities, especially with the COVID-19 pandemic exacerbating the housing issues across the nation, other issues have seemed to be higher priority items on local government official’s agendas, leaving low-income African-American residents living in gentrified neighborhoods without a political voice to express their concerns. In recent years, scholars have noted that environmental conservations initiatives, like Large Green Infrastructure Projects (LGIPs), have led to the construction of more green spaces in urban cities, but have also led to environmental gentrification, which Rigolon and Nemeth (2018) define as “the influx of affluent residents to historically disadvantaged neighborhoods due to investments to improve environmental quality.” This was the case in Chicago’s 606 LGIP which aimed to address the city’s lack of green spaces and contributed to the displacement of numerous long-term, low-income African-American residents. To examine the effects that LGIPs have on surrounding neighborhoods and residents, Rigolon and Nemeth utilized Chicago’s 606 LGIP as a case study and analyzed critical aspects of the LGIP planning process to determine whether local government officials made conscious efforts to advocate on behalf of diverse stakeholders while effectively engaging them. For the past 20 years, Chicago has shown a major lack of housing, yet the city continued to pursue the 606 LGIP and fulfil Mayor Rahm Emanuel’s mission to make Chicago “the greenest city in the world.” Rigolon and Nemeth conducted interviews with key actors who were involved in the planning of the 606, and residents of the local neighborhood who were impacted by the planning of the 606. The interviews with key actors conveyed all residents were in full support of the new green space development within the city, and the interviews with residents conveyed those key actors lacked consideration for the detrimental outcomes for lower-income residents. The researchers later discovered that the city’s planning did not consider the effects the project would have on local housing within
the community. Even though the city showcased the 606 in the city’s sustainability plan and city officials conceptualized the idea for the 606 in its CitySpace Plan, they relinquished their power over policy decisions to park nonprofit groups that were given primary discretion to orchestrate the development of the project. During the interviews with key actors, a representative from one of the park nonprofit organizations, A Trust for Public Land, commented, “We are not in the business of housing; we are in the business of conservation and building parks” (pg. 76). The findings in Rigolon and Nemeth’s study insinuated that city officials overlooked the needs of its community members by undermining Chicago’s housing needs and by forfeiting their control over policy decisions to park nonprofit groups who didn’t have any vested interest in the needs of low-income African-American residents. Rigolon and Nemeth’s research serves as a final example of the pivotal role municipalities play in promoting social equity within ethnic minority communities.

**Conclusion**

My research elaborates on the literature I reviewed by demonstrating how the government-initiated deconstruction of affordable public housing developments, commercialization of cityscapes during reconstruction, and the impact of public engagement on city planning efforts directly influence the housing policy initiatives that are implemented by local governments. Moreover, the cumulative findings across the literature argue that housing policy initiatives implemented by local governments can produce varying outcomes for marginalized individuals, with an emphasis on low-income African-Americans. My research closes the gaps found in the literature by exemplifying the pivotal role of municipalities in promoting social equity within ethnic minority communities, and measuring the effectiveness of local government public outreach strategies to engage ethnic minority community members.
CHAPTER 3: METHODOLOGY

This research project explores the ways housing policy initiatives can produce varying outcomes for marginalized individuals. As previously stated, the research questions I wish to respond to are: How does the City of Inglewood 2021-2029 Housing Element promote social equity for African-American residents? How effectively and equitably did the city engage with its diverse stakeholders in developing its Housing Element? To answer these questions, I used qualitative research entailing official government documents from various agencies that illustrates longitudinal trends in the city’s everchanging atmosphere, and interviews with local community leaders about their engagement with the city housing officials. Official government documents from various agencies will provide me with information about changes in the city’s racial, economic, and housing demographics along with the specific conditions that have prompted these changes to occur. Interviews with local community leaders will provide me with information about the methods that the city’s housing officials utilized to effectively engage local stakeholders, as well as community members, in the development of the 2021-2029 Housing Element. I chose these data collection methods to gain insights about the perspectives and experiences of local stakeholders.

Data Collection

Documents

The documents I analyzed for the research included policy reports, government documents, and previously compiled demographic information. I retrieved my documents online from publicly accessible databases from official websites from the City of Inglewood, the State of California Housing and Community Development, and the Southern California Association of Governments. I gathered various statistics and reports from the United States Census Bureau, the Los Angeles Almanac, City-Data, DataUSA and the World Population Review. From these sources, I compiled data that entailed information about Inglewood’s
changing racial and economic demographics over the past 10 years, different Federal and State housing policy initiatives that have been implemented at the local government in Inglewood, and the community engagement initiatives city housing officials have taken to fulfill the housing requirements in the 2021-2029 Housing Element as mandated by the state of California, as well as the on-going housing requirements within the city.

The California housing element is a state mandate which requires California’s local governments (cities and counties) to adequately plan in order to meet the housing needs of community members (California Department of Housing and Community Development, n.d.). The California housing element is the result of California’s Housing Element Law passed in 1969 and serves as a regulatory system for the private market to provide equitable housing opportunities. The housing element itself if an essential component of each local governments general plan. But more importantly, each local government’s ability to successfully fulfil the requirements set forth in the housing element is a prerequisite for the state’s other funding programs, which are substantial revenue sources for cities and counties.

**Interviews**

For my interviews, I conducted elite interviews; elite interviews are classified as discussions with individuals who are chosen because of who they are or what position they occupy (Hochschild, n.d.). These interviews were conducted via Zoom with high-ranking administrators who work for agencies that serve to address housing issues within Inglewood (e.g. community organizers, non-profit managers, etc.), as well as with civic and community leaders working in local community-based organizations, business associations, and other civic institutions such as churches and schools. Along with non-profit and community organization leaders, I interviewed administrators who work in Inglewood’s Housing and Economic & Community Development departments. Although there are different agencies within Inglewood that serve to address housing issues within the city, I will be focusing on
agencies that uphold a mission to resolve housing issues for marginalized individuals specifically.

I recruited six (6) elite interviewees that were able to provide me with diverse insights based on their own experiences. Of the six elite interviews, 3 were conducted with Inglewood city personnel that work directly with the Housing Element and 3 were conducted with organizations affiliated with the Uplift Inglewood Coalition, an intercity alliance formed to advocate for the city’s governance, economic, and housing issues. I recruited interviewees using stratified random sampling entailing by first researching the various agencies and organizations within the city, and then compiling a comprehensive list of potential individuals along with their contact information. After compiling a comprehensive list of potential organizations along with the high-ranking administrator’s contact information, I then proceeded to establish correspondence either via email or phone to request an interview. Once I successfully established correspondence with the designated high-ranking individual, I provided potential interviewees with information about my study and requested their participation to conduct an interview. If potential interviewees agreed to participate, I emailed them the appropriate consent form detailing the complete study details; I also indicated that they complete and sign the form before emailing it back to me. Once I received the completed and signed form, I then confirm their availability to agree on a date and time of their choosing that would not interfere with their work schedule or prior commitments.

I conducted semi-structured interviews so that I can allow each interviewee the opportunity to adequately respond to questions as it pertains to their engagement with city housing officials. Semi-structured interviews entail asking questions within a predetermined framework and were appropriate to use for my study because this format granted interviewees the opportunity to provide diverse responses based on their personal experiences and individual expertise. I asked interviewees questions about their personal background (e.g.
ethnicity, education, etc.), current position within their agency (e.g. job abilities, civic values, etc) and their level of engagement with city housing officials (e.g. business correspondences, collaborative efforts, etc) and community members in developing the Housing Element.

**Observations**

To supplement the data I compiled from documents and interviews, I conducted observations of Inglewood’s city council meetings on Tuesday February 28th 2023 and Tuesday March 21st 2023. Although each meeting yielded vital data for my research, the city council meeting that took place on Tuesday February 28th was particularly special because it was the first in-person meeting since the closure due to the COVID-19 pandemic. The agenda for both meetings included considerations to adopt resolutions approving the 2021-2029 Housing Element (General Plan Amendments 2023-001). During these meetings, I focused the interactions between the public and city personnel as they elaborated on comments made about the current status of the 2021-2029 Housing Element.

**Data Management & Analysis**

All data collected was kept anonymous to omit any identifying information about interviewees. The raw data was electronically stored, and I utilized various software programs such as Microsoft Excel and Otter.ai to document, record and code interview data. To analyze the data collected from interviewees, I implemented a qualitative coding scheme using deductive codes. The deductive codes derived from the literature I reviewed on housing issues that contributed to the direct displacement of African-American residents. These codes include information on how housing issues are identified and addressed within local communities, how effective the level of community engagement between city housing officials and local community leaders is, and how social equity is interpreted and enforced throughout the city planning process.
Data Collection Limitations

When collecting data for my interviews, the main limitation I encountered was not being able to secure more elite interviews with City of Inglewood housing officials. Initially, I had planned to conduct a total of ten (10) elite interviews; I anticipated conducting 5 interviews with city officials and 5 interviews with local community leaders who serve agencies that address housing issues within the city’s vicinity. When I began my data collection, I prioritized securing interviews with city officials as their insights are necessary for determining whether the city’s subsequent action to address the deficiencies outlined in the previous 2021-2029 Housing Element draft adequately promotes social equity for African-American residents. When I began my recruitment, I made email and phone correspondence with numerous personnel in hopes that they would agree to conduct an interview and share their unique perspectives based on their role within the agency. I attempted to secure interviews with directors, managers, and other administrators from the following departments: Housing Protection (Housing), Economic and Community Development (Planning), Community Development Block Grant and the Administrative Office. Of the 15 city employees I contacted to request an interview, I only received responses from the 3 city employees with whom I ultimately conducted interviews with. I was advised that the lack of responses was due to the city’s significant staffing shortages as a result of the COVID-19 pandemic.

Ethics: Relationship to the Field & Positionality

Prior to my research, I did not have any relationship with the interviewees that I conducted interviews with. I also did not have any prior familiarity with the City of Inglewood and decided to use it as the case for my research due previous contemporary scholarly research conducted in the Los Angeles area. I played an objective role as a researcher in order to obtain true, unbiased insights from city housing officials and local
community leaders advocating for housing rights for African-American residents. As an African-American woman, I acknowledged that ethnic minorities are more susceptible to social inequality and tend to lack the proper political capital to advocate for the social equity they should be afforded. However, I was conscious of this aspect and made sure to approach my research in a neutral, professional manner.
CHAPTER 4: OVERVIEW OF THE CASE

Inglewood, California is a city located in southwestern region of Los Angeles County. The city’s history dates to 1834 when Ignacio Machado, the son of a soldier protecting the first settlers during their voyage from Mexico to Los Angeles, established the Centinela Adobe on Rancho Agape de la Centinela on the 25,000-acre land. Over time, several additions made to Rancho Agape de la Centinela led to the land gradually developing and even prompted the development of another Spanish Colonial style adobe house, the Rancho Causal Armando. Later in 1860, the land along with both adobe homes were bought by a Scottish lord named Sir Robert Burnett and was ultimately acquired by a wealthy Canadian lawyer named Daniel Freeman in 1885. After a railroad station was built around the area in 1888, this paved the way for many new industries and the City of Inglewood was the first settlement to be carved out of the 25,000-acre land.

When Inglewood was incorporated in 1908, the population at the time was only 1,200 and the city’s prime industry was agriculture. During the early 1920s, Andrew B. Bennett, a native of Los Angeles who leased 3,000 acres of the 25,000-acre land, converted a portion of his property into a makeshift landing strip and began attracting pioneer aviators to the Inglewood area. In July 1927 when Bennett’s property was leased by the City of Los Angeles, the land was eventually converted and renamed to Los Angeles International Airport (LAX), and this moment marked the beginning of the Air Age. Although the Air Age stimulated the city’s further development, the start of World War II in 1939 was the catalyst that completely transformed Inglewood from a rural agricultural hub into an urbanized community that sparked a high level of industrial activity and an influx of new workers and their families. From 1920 to 1925, Inglewood was the fastest growing city in the United States and the city’s population and developments have continued to grow ever since. Today, Inglewood is
recognized for its “metropolitan” look, and its continuous developments have been the main
catalyst prompting the city’s everchanging atmosphere.

According to the 2020 Decennial Census, the City of Inglewood population was
recorded as 107,762 and the approximation for each racial group is as follows: 38.7%
(41,708) are Black or African-American, 9.53% (10,271) are White, 2.09% (2,248) are Asian,
2.04% (2,197) are American Indian, 0.33% (356) are Pacific Islander, 33.86% (36,491) are
categorized as Other Race, and 13.45% (14,491) are categorized as Two or More Races. The
city has declined at a rate of -0.18% annually, and the city population has decreased by -
1.94% based on statistics from the 2020 United States Census Bureau report which recoded
the population as 109,309. Aside from the racial demographics, the economic demographics
reported in the ACS indicate that the median household income is $58,536 with an
unemployment rate of about 18.70% and an almost similar poverty rate; these numbers were
estimations at the time and current numbers may still fluctuate significantly due to the effects
observed 2-years since the COVID-19 pandemic started in early 2020. Moreover, the housing
demographics reported in the ACS shows that the approximate total households are 36,104
which 63.9% are renter occupied and 36.1% are owner occupied. The median cost of rent is
about $2,254.00 and the median property value is about $555,000.00

As Inglewood continued to grow, it has simultaneously became more racially
integrated in its residential and business communities. While the city’s once prevalent
African-American population has decreased significantly over the years, the city’s White
(Not Hispanic or Latino) population has steadily increased. The city has also encountered an
inflow of new businesses as many of Inglewood’s prime areas have been renovated to
appease the tastes of more affluent clientele. City officials have attributed the city’s rapid
operations to abiding by their mission statement which professes to “enhance the residential
quality of life in our community, economic vitality of our businesses and entertainment of our
visitors”. However, the emphasis on Inglewood’s rapid growth seems to ignore the demographics changes which have altered the city’s composition over time.

Because the city has undergone many changes which have influenced its racial, economic, and housing demographics, using the City of Inglewood as the case for an exploratory case study is appropriate for examining the relationship between policy decisions that have been enacted by the city, and the policy outcomes that have impacted ethnic minorities. By analyzing the policy initiatives outlined in Inglewood’s 2021-2029 Housing Element, I will determine whether the actions taken by city housing officials promoted social equity for African-American residents, and whether city housing officials were diligent in their efforts to effectively engage diverse stakeholders in developing the Housing Element.

According to the digital correspondence letter from the California Department of Housing and Community Development (HCD) dated April 29, 2022, the initial deadline to submit the City’s 6th cycle housing element was on October 15th, 2021, prior to the start of this study. However, the City had yet to adopt an updated housing element for HCD review. Since the City’s previous 5th cycle housing element which covered the 2013-2021 period no longer satisfied the statutory requirements set forth by State Housing Element Law, the letter stated that revisions were necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The letter reiterated the importance of housing element compliance as eligibility criteria for several federal, state, and regional funding programs. It also emphasized that any local government that fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), must complete all rezoning to accommodate the Regional Housing Needs Allocation (RHNA) no later than one year from the statutory deadline. At the end of the digital correspondence letter was an extensive list of the changes necessary to bring the City’s housing element into compliance with Article 10.6 of the Government Code (Appendix A).
The Regional Housing Needs Assessment (RHNA) is mandated by State of California Housing Law and is utilized as a means to quantify the housing needs within each jurisdiction during specific planning periods that coincide with each jurisdiction’s housing element. The purpose of the RHNA is to provide communities with the data necessary to prioritize local land allocation and determining the best way to address identified existing and future housing needs resulting from population, employment and household growth. Although the RHNA does not intend to promote growth within communities, it instead provides communities with accurate statistics for regions to collectively enhance quality of life, improve access to jobs, promote transportation mobility, and above all, address social equity and fair share housing needs. The Southern California Association of Governments (SCAG) is the jurisdiction responsible for conducting the RHNA for six (6) counties and 191 cities including the City of Inglewood.

Table 1: Southern California Association of Governments (SCAG) 6th Cycle Timeline

<table>
<thead>
<tr>
<th>Council of Governments/Jurisdictions</th>
<th>Number of Jurisdictions</th>
<th>6th Cycle RHNA Projection Period</th>
<th>Sixth Housing Element (HE) Revision Due Date</th>
<th>Housing Element Planning Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Southern California Association of Governments (SCAG): Counties (8) and cities (191) within each county: Imperial [7], Los Angeles [98], Orange [34], Riverside [30], San Bernardino [24], and Ventura [10]</td>
<td>197</td>
<td>June 30, 2021 – October 15, 2029</td>
<td>October 15, 2021</td>
<td>October 15, 2021 – October 15, 2029</td>
</tr>
</tbody>
</table>

SCAG completed the final RHNA allocation plan for the 6th cycle in March 2021 and provided the following housing needs allocations of very-low income, low income, moderate income, and above moderate-income levels by county. Of the total 1,341,827 anticipated new housing units throughout the six (6) counties, Los Angeles County has the largest allocation requiring approximately 812,060 (61%) to be constructed during the 8-year period from 2021-2029. Los Angeles county also surpasses the other counties in the amount of anticipated new housing units across all income levels. The approximate 812,060 anticipated new housing units in Los Angeles County are expected to serve 217,273 (27%) very low-income
residents, 123,022 (15%) low-income residents, 131,381 (16%) moderate income residents, and 340,384 (42%) above moderate income residents.

Table 2: SCAG Regional Housing Needs Assessment (RHNA) Totals by County

<table>
<thead>
<tr>
<th>Allocation By County</th>
<th>Total</th>
<th>Very-low income</th>
<th>Low income</th>
<th>Moderate income</th>
<th>Above moderate income</th>
</tr>
</thead>
<tbody>
<tr>
<td>Imperial</td>
<td>15,993</td>
<td>4,671</td>
<td>2,357</td>
<td>2,198</td>
<td>6,767</td>
</tr>
<tr>
<td>Los Angeles</td>
<td>812,060</td>
<td>217,273</td>
<td>123,022</td>
<td>131,381</td>
<td>340,384</td>
</tr>
<tr>
<td>Orange</td>
<td>183,861</td>
<td>46,416</td>
<td>29,242</td>
<td>32,546</td>
<td>75,657</td>
</tr>
<tr>
<td>Riverside</td>
<td>167,351</td>
<td>41,995</td>
<td>26,473</td>
<td>29,167</td>
<td>69,716</td>
</tr>
<tr>
<td>San Bernardino</td>
<td>138,110</td>
<td>35,667</td>
<td>21,903</td>
<td>24,140</td>
<td>56,400</td>
</tr>
<tr>
<td>Ventura</td>
<td>24,452</td>
<td>5,774</td>
<td>3,810</td>
<td>4,525</td>
<td>10,343</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>1,341,827</td>
<td>351,796</td>
<td>206,807</td>
<td>223,957</td>
<td>559,267</td>
</tr>
</tbody>
</table>

**Housing Characteristics**

In April 2021, SCAG presented the City of Inglewood with a formal report consisting of local housing data pre-certified by the California Department of Housing and Community Development (HCD), as well as jurisdiction-level data elements intended to provide an understanding of housing needs experienced in Inglewood as a part of its 6th cycle housing element update.

**Stock**

The age of the current housing stock is key to understanding how historical development patterns have contributed to a city’s form. The time period where the highest share of Inglewood’s housing units was built was 1950-1959, while in the SCAG region more units were built during 1970-1979 than any other period. But from 1960 and so forth, the share of Inglewood’s housing units has continuously decreased to the point where the time period 2014 & later shows an almost non-existent percentage.
The housing stock in Inglewood, which has a total of 38,688 housing units. The most prevalent housing type in Inglewood is multifamily, 5+ units with 15,903 units. The share of all single-family units in Inglewood is 44.1%, which is lower than the 61.7% share in the SCAG region. Out of the total housing units in Inglewood, there are 37,020 occupied units, which equates to a 4.3% total vacancy rate. The average household size (as expressed by the population to housing unit ratio) is 2.984.

Table 4: City of Inglewood Housing Types

Tenure

Moreover, the SCAG data showing the housing tenure by year moved to current residence shows that the majority of Inglewood residents that started living in their current
residences from 1989 or earlier actually owned their households. But as time progressed, the number of owner-occupied households decreased significantly, and the majority of Inglewood residents that started living in their current residences starting in the year 2000 and later rented their households.

*Table 5: City of Inglewood Housing Tenure by Year Moved to Current Residence*

![Housing Tenure by Year Moved to Current Residence](image1)

Housing security can depend greatly on housing tenure. The data provided in the SCAG report is similar to the previous approximations I provided for the city’s housing tenure. Initially, I provided that the approximate total households in Inglewood are 36,104, of which 63.9% are renter occupied and 36.1% are owner occupied; the SCAG report provides the approximate total households in Inglewood as 36,604, of which 23,572 (64.4%) are renter-occupied and 13,032 (35.6%) are owner-occupied. The share of renters in Inglewood is higher than in the SCAG region overall.

*Table 6: City of Inglewood Housing Tenure*

![Housing Tenure](image2)
**Affordability**

In addition to housing tenure, housing security can depend greatly on a household’s ability to afford their current housing costs, as well as their ability to afford their future housing costs. This ability could be impacted by various factors including general supply and demand of the housing market, as well as widespread inflation. Housing cost burden is most commonly measured as the percentage of gross income spent on housing, with 30% a usual threshold for 'cost burden' and 50% the threshold for 'severe cost burden.' However, a lower-income household spending the same percent of income on housing as a higher-income household will likely experience more true 'cost burden'.

*Table 7: City of Inglewood Cost Burden by Income*

<table>
<thead>
<tr>
<th>Income</th>
<th>&lt; 30%</th>
<th>30-50%</th>
<th>&gt; 50%</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 30% HAMFI</td>
<td>685</td>
<td>1,064</td>
<td>6,650</td>
</tr>
<tr>
<td>30-50% HAMFI</td>
<td>1,430</td>
<td>3,435</td>
<td>2,505</td>
</tr>
<tr>
<td>50-80% HAMFI</td>
<td>4,165</td>
<td>3,110</td>
<td>679</td>
</tr>
<tr>
<td>80-100% HAMFI</td>
<td>3,085</td>
<td>565</td>
<td>104</td>
</tr>
<tr>
<td>&gt; 100% HAMFI</td>
<td>7,525</td>
<td>950</td>
<td>43</td>
</tr>
<tr>
<td>Total Households</td>
<td>16,890</td>
<td>9,124</td>
<td>9,981</td>
</tr>
</tbody>
</table>

For Inglewood’s 23,572 renter households, 13,868 (58.8%) spend thirty percent of more of gross income on housing cost, compared to 55.3% in the SCAG region. Additionally, 7,135 renter households in Inglewood (30.3%) spend fifty percent or more of gross income on housing cost, compared to 28.9% in the SCAG region. The general trend is that low-income renter households spend a higher share of income on housing (e.g. over 50%) while high-income renter households are more likely to spend under 20% of income on housing.
Table 8: City of Inglewood Spending on Rent by Income

While renter households receive much of the focus when it comes to housing cost analysis, owner households make up 35.6% of Inglewood and can provide evidence as to whether Inglewood’s long-term homeowners are able to withstand their increased housing costs. For Inglewood’s mortgage-holding households, 4,558 (45.7%) spend over thirty percent of household income on housing costs. Again, the general trend observed is that lower-income owner households spend a higher share of income on housing costs, while high-income owner households tend to spend a lower share of income on housing.

Table 9: City of Inglewood Cost for Mortgage Holders by Income
Housing Needs Determination

The SCAG concluded its report by providing a breakdown of extremely low-income households (below 30% of area median income) in Inglewood categorized by race and ethnicity. The data used for this breakdown was obtained from the Comprehensive Housing Affordability Strategy (CHAS) dataset by the United States Department of Housing and Urban Development (HUD). Although the breakdown shows the race/ethnicity with the highest share of extremely low-income households in Inglewood is Hispanic (28.2% compared to 24.5% of total population), the race/ethnicity with the highest share of extremely-low income households in the entire SCAG region is Black, non-Hispanic (27.1% compared to 17.7% of total households).

Table 10: City of Inglewood Extremely Low-Income Housing Needs

<table>
<thead>
<tr>
<th>Extremely Low Income Housing Needs</th>
<th>Total Households</th>
<th>Households below 30% HAMFI</th>
<th>Share below 30% HAMFI</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, non-Hispanic</td>
<td>1,950</td>
<td>430</td>
<td>22.1%</td>
</tr>
<tr>
<td>Black, non-Hispanic</td>
<td>19,210</td>
<td>4,260</td>
<td>22.2%</td>
</tr>
<tr>
<td>Asian and other, non-Hispanic</td>
<td>1,765</td>
<td>408</td>
<td>23.1%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>13,664</td>
<td>3,854</td>
<td>28.2%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>36,589</td>
<td>8,952</td>
<td><strong>24.5%</strong></td>
</tr>
<tr>
<td>Renter-occupied</td>
<td>23,890</td>
<td>7,595</td>
<td>31.8%</td>
</tr>
<tr>
<td>Owner-occupied</td>
<td>12,690</td>
<td>1,360</td>
<td>10.7%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>36,580</td>
<td>8,955</td>
<td><strong>24.5%</strong></td>
</tr>
</tbody>
</table>

Based on the final 6th cycle Regional Housing Needs Assessment (RHNA) conducted by the Southern California Associations of Governments (SCAG), the total number of anticipated new housing units needing to be constructed in the City of Inglewood was projected to be 7,439 and is expected to serve 1,813 (24%) very low income residents, 955 (13%) low income residents, 1,112 (15%) moderate income residents, and 3,559 (48%)
above moderate income residents. Of these totals, 2,768 (37%) anticipated new housing units are expected to accommodate very low-income and low-income residents specifically.

Table 11: City of Inglewood Final 6th Cycle Housing Needs Allocation

<table>
<thead>
<tr>
<th>Income Level</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very Low Income (&lt;50% of AMI)</td>
<td>1,813</td>
</tr>
<tr>
<td>Low Income (50-80% of AMI)</td>
<td>955</td>
</tr>
<tr>
<td>Moderate Income (80-120% of AMI)</td>
<td>1,112</td>
</tr>
<tr>
<td>Above Moderate Income (&gt;120% of AMI)</td>
<td>3,599</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>7,439</td>
</tr>
</tbody>
</table>

Over the past two decades (2000-2020), there has been more development in multi-family residential units than single-family residential units in Inglewood. When comparing 2000 to 2020, single-family units increased by -86, multiple-family units increased by 155, and mobile homes decreased by -29. Moreover, between 2000 and 2018, median home sales prices in Inglewood increased 245% while prices in the SCAG region increased 151%. The SCAG report provided evidence showing that the housing for Inglewood’s low-income residents has been impacted significantly more than their higher-income counterparts; this trend can be attributed to decreased availability of affordable housing within the Inglewood.

Being that African-Americans account for approximately 38.7% of Inglewood’s residential population and 27.1% of the share of extremely low-income households in the entire SCAG region, these considerations should be factored into the city’s 2021-2029 Housing Element to ensure that the housing needs of African-American residents are addressed in an effective and equitable manner throughout the SCAG’s 6th cycle 8-year period. Especially 37% of the anticipated new housing units are expected to accommodate very low-income and low-income residents.
CHAPTER 5: FINDINGS

During my interviews with City of Inglewood housing officials and local community leaders, I encountered contrasting narratives about how the lack of input from the public led the city to proceed with the housing element process, and notions about how the lack of initiative from the city led to the housing needs of local, low-income African-American residents, not being addressed as needed. Through the coding process, I identified two key themes that I believe have attributed to the divergent perspectives between City of Inglewood housing officials and local community leaders.

Preconceived Notions Among City Housing Officials and Local Community Leaders

Impeded Discussions About Social Equity for African-American Residents

Although it appears that Inglewood’s 2021-2029 housing element has been a great source of tension between city housing officials and local community leaders, the tension between the two groups existed prior to the start of the 6th cycle housing element process due to resident’s declining trust in city official’s motives overall. As local community leaders mentioned throughout their interviews, the subsequent actions that Inglewood has taken to address the housing issues experienced by community members has been a complete contrast from their declaration to ensure that the needs of the local community are prioritized.

Although several instances were mentioned that the most pivotal moment in which local community leaders’ loss confidence in the city’s ability to prioritize the housing needs of residents was city housing official’s delayed response to enact a rent stabilization ordinance in Inglewood. In the process of city officials authorizing several multi-million-dollar developments, a multitude of Inglewood residents were subjected to monthly rent increases of more than $1,525.00 and lead many renters being “pushed out” of their long-time residences. While the remaining residents pleaded with city housing officials to enact immediate action to protect tenants, local community leaders implied that Inglewood was
“passive” in their efforts, and the city was failing to act appropriately to address critical housing matters.

The California Department of Housing and Community Development (HCD) plays a critical role in reviewing each local government’s housing element and determining whether it complies with state law. However, local governments play a critical role in guaranteeing that their housing element adequately addresses the housing issues within their local communities and execute their due diligence to consider all stakeholders when addressing these housing issues. Especially within ethnic minority communities, the municipality is the sole authority in promoting housing equity for its citizens. To be in compliance with State housing laws, the Statutory Authorities/Requirements says that local governments must recognize their responsibility in contributing to the attainment of the State’s housing goals, preparing and implementing housing elements that provide opportunities for new housing and address regional housing needs. Unfortunately, the City of Inglewood, like most localities throughout California, has faced challenges in meeting the demand for affordable and livable housing. Inglewood has undergone dynamic transformation over the years but haven’t been able to keep up with the exponentially increasing housing demands from residents. Specifically, residents who are both low-income and renters have expressed the greatest demand for more housing so they can maintain their residency in Inglewood. To build upon the housing goals achieved throughout Inglewood’s 5th cycle period from 2013-2021, city officials have implemented various housing initiatives including a total of 37 citywide programs and entails a Housing Protection ordinance limiting rent increases. Program like the Tenant Based Rental Assistance (existing) which provides residents with vouchers to secure low-income Section 8 housing, and the First Time Homebuyers Initiative (new) which provides residents with financial incentives to secure permanent, stable housing were implemented to help residents “progress along a pathway of affordable housing options that
enable them to live decently, participate fully in the community, and move up into better housing units over the course of their lifetimes, until they ultimately own property.”

Focusing on affordable rents will not only enable Inglewood residents to save money to build equity through homeownerships but will also enable the city to help address the wealth disparities that exist between people of color and others in the Los Angeles area. But in order to secure ample funding needed to build more affordable housing units, city officials decided to emphasize lucrative investments as a way to generate more revenue and further advance Inglewood’s housing vision. The successful redevelopment of the historic Hollywood Park and entertainment area and the construction of the new SoFi Stadium have positively promoted the city’s attractiveness to investment. The Intuit Dome was specifically highlighted because of the city’s negotiated Intuit Dome Implementation Community Benefits Program, which is expected to provide over $80 million for programs that help develop and preserve affordable housing. Yet, the city’s emphasis on attracting more investments to secure more funding for constructing new affordable housing units was perceived by the public as city officials acting on their own money-driven desires. Moreover, local community leaders interpreted the city’s actions as a failure to act on behalf of the African-American residents they have always promised to serve. When interviewing local community leaders, each leader explained that they were affiliated with organizations that prioritize racial and social equality, and because of this, they acknowledged that they hold local governments, as well as local officials, to high standards as they are have authority over the policy decisions that could either improve or worsen the lives of vulnerable ethnic minorities. Each individual stated that the housing issues for Inglewood’s African-American renters have steadily increased as the city has become more gentrified over the years; however, the COVID-19 has intensified the housing issues for African-American renters, and has urged local housing advocates to implore city housing officials to take prompt action. But
instead of merely waiting for the city to facilitate action at their own discretion, almost all local community leaders shared that they joined an alliance with the Uplift Inglewood Coalition to streamline the collective efforts from other organizations advocating for beneficial housing policies on behalf of Inglewood’s African-American renter population. The Uplift Inglewood Coalition is a collective of businesses, faith groups, and community organizations working together to “ensure the vision of Inglewood’s future includes and benefits everyone.” The purpose of the coalition is to “strengthen Inglewood resident’s political power through education, advocacy, and direct action” by “standing against mass evictions, displacement, and all of the negative effects associated with gentrification.” To facilitate these efforts with Inglewood residents, the local community leaders detailed how they engaged community members through one-on-one conversations, community surveys and community forums to gather input about the type of action residents need city housing officials to take. All community leaders unanimously stated that housing has been the top priority for Inglewood residents, and the majority of residents voiced a need for more affordable housing throughout the city to offset the inflated housing costs.

The coalition was founded in 2015 and first assembled in 2017 when news broke that the Los Angeles Rams and Chargers National Football League teams were being located to the City of Inglewood, and when local community members began noticing the city’s neighborhoods rapidly changing. The increasing cost of living has continued to jeopardize housing for residents who have lived in the area for decades, so the Uplift Inglewood Coalition and its affiliates have championed to give Inglewood residents a “strong, united communication channel that could speak to the concerns that neighborhoods are experiencing. City housing officials responded by denying all claims of eminent domain proceedings to complete a land sale for the new Los Angeles Clippers arena. Initially, they claimed that they were in long-standing negotiations with the L.A. Clippers to ensure that the
original proposal did not “support the use of eminent domain to take any residential property.” However, city housing officials rejected their initial stance and decided to move forward with the proceedings to overtake residential, small businesses, and even church properties. The city council voted to approve the proposal without this condition to safeguard Inglewood’s current housing stock, and the Uplift Inglewood Coalition launched the Homes Before Arenas campaign to overturn the sale without considering public good first before prioritizing revenues for the City of Inglewood. By utilizing grassroot organizing and engaging Inglewood community members and residents, the coalition was able to secure a pledge from the Clippers Organization promising to provide $100 million in community benefits to the city of Inglewood, including $75 million for affordable housing. Though this was a momentous victory for the coalition and Inglewood residents, local community leaders started to question whether the actions of city housing officials are done in good faith or done out of monetary benefit.

In regards to the coalition collaborating with the city to adopt a permanent local Housing Protection ordinance, the local community leaders explained that they have made every attempt to make direct contact with Inglewood city housing officials before and even during the COVID-19 pandemic, but community leaders have described the behaviors of city housing officials as “elusive” because of ambiguous responses as exhibited in the past. This is when the Uplift Inglewood Coalition decided to take matters into their own hands, and in the Spring of 2018, coalition members organized the rent stabilization initiative to get rent stabilization on the ballot. Coalition members endeavored to garner enough political momentum, but their efforts could not keep up with the rate at which registered voters were being displaced and many of the signatures did not qualify for the ballot. Through their dedicated efforts, the coalition was able to amass more than 10,000 signatures proving that the policy had mass support throughout the city, and maintained a constant, strong presence
at City Council meetings showing that the Inglewood community still had a way of leveraging political power even without the city’s facilitation. At the time of the vote, coalition members continued to tell their personal stories about how city housing official’s failure to act promptly has dismantled Inglewood’s long-standing communities, and implored the city council to pass a rent stabilization ordinance, a lower annual rent increase cap, and robust eviction protections. Finally, after three and a half years of community advocacy, the Uplift Inglewood Coalition won rent stabilization in Inglewood, and the local Inglewood community reclaimed control over their right to fair, affordable housing. The passing of the rent stabilization ordinance in Inglewood was a historic victory for both vulnerable Inglewood residents, as well as housing justice advocates throughout California. Still, the three-and-a-half-year ordeal of fighting to give vulnerable Inglewood residents the housing protections the city should have automatically granted was enough to deter local community leaders from initiating direct collaboration with city housing officials for the 2021-2029 Housing Element process, and has impeded discussions about social equity for all community members including Inglewood’s African-American residents.

**Communication Barriers During the COVID-19 Pandemic Obstructed Effective Engagement Between City Housing Officials and Local Community Leaders**

The COVID-19 pandemic has exacerbated society’s ongoing social issues and has forced municipalities alike to navigate the multitude of unprecedented circumstances that resulted. One of the most unprecedented circumstances that was universally experienced was the inability to engage in effective face-to-face communication due to stay-at-home orders that were strictly enforced by U.S. federal, state, and local authorities in March 2020. Social institutions including education, religion, and government in particular, were once again faced with another challenge they were required to deal with: ensuring the continuity of essential public services despite the conventional means of direct interaction. Government
institutions mobilized by transitioning to a mode of remote communications in which public administrators relied on digital tools to collaborate with both internal and external stakeholders. During the interviews with City of Inglewood housing officials, it was stated that transitioning to remote communications did cause a lapse in the city’s operations because many employees were struggling to adapt to such unorthodox working conditions, in addition to struggling to utilize new technology and software that served as their primary means of interacting with other employees and community members. Although municipalities worked in their capacity to ensure the continuity of essential public services despite conventional means, communication barriers created in the midst of the COVID-19 pandemic nonetheless obstructed effective engagement between city housing officials and local community leaders in developing the 2021-2029 Housing Element.

When a local government goes through the process of updating their previous housing element, there is a public participation requirement which states that the local government must make the draft available for public comment 30 days prior to the first draft being submitted. If the public submits any written comments received from any public agency, group, or person, then the local government must take at least 10 business days to consider and incorporate the public’s comments accordingly. Additionally, public agencies, groups, and individual people have the option to submit comments regarding a jurisdiction’s housing element directly to The California Department of Housing and Community Development (HCD) for consideration. Afterwards when the draft housing element is submitted to HCD, the first review will take up to 90 days to before its returned to the local government to either revise and adopt or adopt without changes. There is also a transparency requirement which states that the local government must post the housing element draft containing all subsequent revisions on its website, as well as email a link to all individuals and organizations that have previously requested notices at least seven days before submitting the
revised draft to HCD. Once HCD submits written findings back to each local government, their approval is required before any local government can finally adopt its housing element as part of its overall General Plan. In regards to Public Participation, California law requires local governments to incorporate public input when developing a Housing Element; specifically, Government Code section 65583(c)(7) says “that the local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.”

When interviewing Inglewood housing officials, the personnel were proud to share the initiatives that they have implemented in the midst of the COVID-19 pandemic to address the city’s 2021-2029 housing element for the 6th cycle. The personnel spoke at length about how staff has strived for and achieved their goal of resuming “normal” business operations given the unprecedented circumstances, and how their diligence has allowed the city to implement their housing initiatives like the multitude of housing programs tailored to various groups. Most notably, they mentioned how they used the 2021-2029 Housing Element webpage located on the official City of Inglewood website as a sole source for providing the public with all updates regarding the housing element process. The webpage included various hyperlinks to furnished drafts of the 2021-2029 housing element, correspondence letters from the California Department of Housing and Community Development (HCD), the revised drafts indicating HCD revisions and recommendations, and the HCD site inventory list updated as of March 2023. Included was also a Housing Elements FAQs document which addressed frequently asked questions such as what the purpose of the housing element, why the housing element is an important aspect of the city’s operations, and how the housing element impacts local stakeholders. The initial public review draft of the 2021-2029 housing element was first made available for public comment on November 24, 2021. To stimulate
public participation, Inglewood city staff and its consultants claimed to conduct outreach through several different methods including community outreach, stakeholder interviews, educational podcasts, email broadcasts, and finally, utilizing the city’s 2021-2029 Housing Element webpage located on the official City of Inglewood website. These methods were set to be initiated during different stages of the Housing Element process, and the purpose of these methods were stated to “elicit inputs from all segments of the community, including those who do not often participate in City meetings.”

The personnel also highlighted the two (2) online community workshops conducted on December 8th, 2021, via Zoom as the primarily mode of collaboration between community members and the City to gain feedback on the updated housing element. Both workshops were conducted live, and each presentation lasted for approximately 1 hour and 30 minutes. Additionally, the presentations were interactive as they provided in-depth background information about the housing element process and prompted several Q&A sessions after each housing concern topic was discussed to address any stakeholder concerns. But aside from the positive endeavours that have been made, city personnel discussed that one of the major difficulties they experienced throughout the housing element process has been gaining substantial feedback from residents and other local stakeholders so that the city can tailor the housing element based on the diverse insights received. The personnel acknowledged that the City is responsible for accommodating the housing requirements as mandated by the state and a accommodating the housing requirements as needed by local residents. However, the personnel stated that in order for them to effectively achieve both of these goals, they needed more residents to participate in the engagement opportunities that the city has offered. Particularly, many residents who have opportunities to attend city-initiated functions, like regularly scheduled city council meetings, simply choose not to participate and forfeit their right to voice their opinions about the critical subject matter listed on meeting agendas.
Similar to the public engagement activities that the city has offered to gain resident’s insights about housing issues that need to be addressed, those residents who have chosen not to participate have equally forfeited their right to voice their opinions about the housing-related issues that the city may not know about otherwise. Despite the widespread dissemination of the initial public review draft, no public comment letters were received during the initial 30-day period. And as a result, the overall lack of public response from residents has led city personnel to seek other ways of obtaining feedback from other stakeholders, and city personnel have relied on this data to shape the housing element into what it is today.

Inglewood primarily relied on the city’s official website and Zoom to coordinate digital communication efforts with local community members as well as local community leaders. However, the city may have inadvertently overlooked the fact that not all community members are adept at using technological devices and software, which could inhibit a community members ability to actively participate in these outreach strategies. Moreover, the city may have inadvertently overlooked the fact that not all community members were able to attend the online community workshops when they were originally presented due to other obligations, like and extensive work schedule, which would have also inhibited their ability to actually be present during the scheduled times. Many local community leaders explained that the Inglewood resident population is comprised of low-income individuals who are forced to work multiple jobs just to even sustain their substandard housing conditions that's still surpasses their housing costs burden threshold. While Inglewood residents may have been provided different options for participating in the housing element process, that does not necessary mean that they were able to take advantage of the opportunities and may not have felt excluded from the housing element process when the city did not provide alternative options for participation.
CHAPTER 6: CONCLUSION

This study explored the ways housing policy initiatives can produce varying outcomes for marginalized individuals and tested whether certain initiatives adequately promoted social equity for African-American residents. The results suggest that there appeared to be a disconnect between the initiatives city housing officials have implemented to address the city’s ongoing housing issues, and the prompt, attentive action that African-American residents claimed to lack from city housing officials. It can be inferred that although City of Inglewood housing officials have claimed to execute their due diligence in addressing the housing issues within their local communities and fulfill the housing requirements as mandated by the state, there still appeared to be a disconnect between the initiatives the city has previously implemented and the support that long-term African-American residents claimed to be lacking from city housing officials. It can also be inferred that the lack of discussions about social equity for African-American residents and the lack of engagement between city housing officials and local community leaders stemmed from the preconceived notions among both groups, as well as communications barriers created during the early stages of the COVID-19 pandemic.

My findings of strongly supported the past findings of previous scholars, and my study positively expanded on previous research which discussed government-initiated deconstruction of affordable public housing developments, commercialization of cityscapes during reconstruction, and the impact of public engagement on city planning efforts. Inglewood’s Housing Element draft acknowledged that Inglewood is undergoing dynamic change with significant infrastructure investments in the commercial sector and highlighted the construction of the SoFi Stadium as a way to promote the city’s attractiveness for investments. Similar to Hyra’s (2012) study, the SoFi has been one of Inglewood’s largest capital projects to date and has reduced the amount of affordable housing stock in the area.
Additionally, the city’s investments in the transportation sector, the Metro Rail K Line in particular, aligns with Chronopopulos’ (2020) study describing how the construction of new, exciting public amenities tend to cater to middle-class taste, and which leads to pervasive gentrification. In turn, pervasive gentrification leads to the displacement of many low-income individuals who have been long-term residents for years. Lastly, the reactions from local community leaders regarding Inglewood housing official’s use of eminent domain to overtake residential property coincides with Hajnal and Troustine’s (2010) study emphasizing the importance of local government officials to sustain coordination and coherence among a wide variety of to ensure that scarce resources, like housing, are allocated appropriately.

In spite of the COVID-19 pandemic, it is ultimately the responsibility of municipalities to ensure that they have made every conscious effort to continuously serve their local communities by constantly exploring new, innovative strategies to effectively engage community members. While a municipality may fulfil their civil duty by following procedural conduct and disseminating information to the public as required by law, they should still be obliged to impart a vested interest in their local communities in order to uncover any underlying social barriers that may be hindering citizen participation. Discovering new innovative methods to effectively engage diverse community members in public processes, like updating a city’s Housing Element, is crucial for reaching marginalized stakeholders who do not possess the necessary political capital to advocate for themselves. Of course, investing time, money, and personnel into researching, testing and evaluating these new innovative methods can add to the burdens that municipalities are already obligated to bear. But because a core goal of public administration is to enact policies that support the welfare of stakeholders, effective public engagement is paramount for municipalities in promoting social equity within ethnic minority communities.
Future Research Recommendations

More research in the fields of Public Administration and Urban Planning needs to be conducted to not only study whether current public policies advocate for marginalized populations but to also study whether the processes in which these public policies are facilitated engage members of marginalized populations and promote social equity overall. Conducting a quantitative study to determine the number of low-income ethnic minorities living in densely populated areas and experiencing a housing cost burden of 30% or more will enable public administrators to decide whether current housing policies and processes are effectively serving marginalized populations.

Policy Recommendations

The COVID-19 pandemic has surely changed public administrators’ outlook on the communities they serve, so it’s imperative that more socially equitable practices be incorporated into the policy making cycle. Based on my research, I recommend that municipalities start instituting Community Benefits Agreements (CBA) as essential components of each local government’s public policy process. A Community Benefits Agreement is a contract signed by community-based organizations representing resident’s interests and developers who intend to construct property in a community’s residential, commercial, or industrial areas (Local Initiatives Support Corporation, n.d.). Community-based organizations give their support to a developer in exchange for the developer assuring that the development will benefit the local community if the project moves forward (PolicyLink, n.d.). In her own scholarly research, Werkneh (2018) also voices her support for cities utilizing Community Benefits Agreements as a way to ensure that displaced residents, specifically residents of low-income minority communities, are granted the necessary resources to secure affordable housing in the event that they become displaced during the construction of a new community development. Ultimately, Community Benefits
Agreements would provide just, restorative compensation to displaced community members who were harmed as a result of gentrification, and seek to hold developers, as well as city officials, accountable for “healing” gentrified communities that have suffered from the loss of community in the name of revitalization.
REFERENCES


APPENDIX A.

Letter from the California Department of Housing and Community Development Regarding

the City of Inglewood’s 6th Cycle (2021-2029) Draft Housing Element

April 29, 2022

Bernard McCrumby Jr., Senior Planner
Economic and Community Development Department
City of Inglewood
One Manchester Blvd,
Inglewood, CA 90301

Dear Bernard McCrumby Jr:

RE: City of Inglewood’s 6th Cycle (2021-2029) Draft Housing Element Update

Thank you for submitting the City of Inglewood’s draft housing element received for review on February 1, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. The review was facilitated by communications in April 2022.

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

As a reminder, the City’s 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City’s 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government’s housing element will no longer...
comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill(SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD’s Affordable Housing and Sustainable Communities programs; and HCD’s Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor’s Office of Planning and Research at https://www.opr.ca.gov/planning/general-plan/guidelines.html.

HCD appreciates the communication you and consultant Phil Burns have provided during our review. We are committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Irvin Saldana, of our staff, at Irvin.Saldana@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Enclosure
APPENDIX
CITY OF INGLEWOOD

The following changes are necessary to bring the City’s housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD’s website at http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml.

Among other resources, the housing element section contains HCD’s latest technical assistance tool, Building Blocks for Effective Housing Elements (Building Blocks), available at http://www.hcd.ca.gov/community-development/building-blocks/index.shtml and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

The element must provide a cumulative evaluation of the effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness).

B. Housing Needs, Resources, and Constraints

1. Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)

Data Maps: The element should be updated to include relevant data maps where applicable. Currently, the element only features maps corresponding to income and race within the City. For a list of complete requirements please refer to (p. 86) of HCDs AFFH memo. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf.

Outreach: Outreach specifically related to affirmatively furthering fair housing (AFFH) is foundational to a complete analysis and formulating appropriate goals and actions to overcome patterns of segregation and foster more inclusive communities. The City should summarize and relate outreach efforts to all components of the AFFH analysis and modify or add goals and actions as appropriate. For example, the element mentions outreach methods and notes comments related to the overall housing element. However, a summary of that outreach should be tailored to the various components of
the assessment of fair housing to better formulate an appropriate programmatic response.

Enforcement: The element mentions local capacity for fair housing education and outreach, but it should also evaluate trends and characteristics related to fair housing complaints and address compliance with existing fair housing laws as well as any past or recurrent fair housing lawsuits, findings, settlements, judgements, or complaints. Based on the outcomes of this evaluation, the element should summarize issues, identify contributing factors and formulate meaningful goals and actions.

Integration and Segregation: While the element addresses integration and segregation related to race and income, it should also analyze familial status. This analysis should evaluate patterns within the City and compare the City to the region.

Disproportionate Housing Needs, Including Displacement: The element includes information on overcrowded and overpaying households and persons experiencing homelessness; however, analysis on substandard housing must be added. In addition, local spatial trends of homelessness in the City, as well as any patterns and trends in coincidence of homelessness with protected class groups must be evaluated.

Local Data and Knowledge, and Other Relevant Factors: The element must include local data, knowledge, and other relevant factors to discuss and analyze any unique attributes related to fair housing issues within the City. The element should complement federal, state, and regional data with local data and knowledge where appropriate to capture emerging trends and issues, including utilizing knowledge from local and regional advocates and service providers. For example, local data and knowledge is information obtained through community participation, consultation with stakeholders, and lived experiences of residents alike. Furthermore, while the element provides information on the historical context of redlining practices, the element can provide additional analysis on the effects of hazardous material and the effectiveness of investment and disinvestment in different areas of the City.

Contributing Factors to Fair Housing Issues: The element should re-assess and prioritize contributing factors upon completion of analysis and make revisions as appropriate.

Goals, Actions, Metrics, and Milestones: The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics and milestones as appropriate and must address, as appropriate based on the outcomes of the analysis, housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community revitalization and displacement protection. For further guidance, please visit HCD’s AFFH in California webpage at https://www.hcd.ca.gov/community-development/affh/index.shtml.
2. Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)

Extremely Low-income (ELI) Households: Currently, 25 percent of all households are considered ELI. Given the identified need, the element must provide additional analysis of overpayment, affordability gaps, and effectiveness of past programs, resources, and new strategies in addressing the ELI housing need.

In addition, the element must quantify the projected ELI household need. Projected ELI households can be calculated by using available census data to determine the number of very low-income households that qualify as ELI households or presume that 50 percent of the regional housing need allocation (RHNA) for very low-income households qualify as ELI households. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml.

3. Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)

Housing Conditions: The element identifies the age of the housing stock. However, it must estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable builders/developers/property managers, including non-profit housing developers or organizations.

4. An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality’s housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)

Progress in Meeting the RHNA: The City’s RHNA may be reduced by the number of new units built since June 30, 2021; however, the element must demonstrate their affordability and availability in the planning period. The element must demonstrate affordability based on rents, sales prices or other mechanisms ensuring affordability (e.g., deed-restrictions). To demonstrate availability, the element should discuss how likely the units will be built in the planning period such as addressing the status of each project, anticipated approvals and permitting and likely build out in the planning period.

Realistic Capacity: While the element may utilize zones that allow 100 percent non-residential uses toward the RHNA, the calculation of residential capacity must account...
for the likelihood of 100 percent nonresidential uses. The element describes recent history in zones allowing 100 percent nonresidential uses, including recent developments without residential uses. However, the element should either incorporate these trends into the calculations of residential capacity or add or modify programs to establish performance standards or other mechanisms to ensure residential development in zones allowing 100 percent nonresidential uses.

Nonvacant Sites: The element provides improvement value to total value (IVTV) ratios and other criteria such as proximity to transit lines to show the redevelopment potential of select sites. However, the element will need to include additional factors that demonstrate the potential for redevelopment of these sites in the planning period. The methodology must consider factors such as the extent to which existing uses may constitute an impediment to additional residential development, the City’s past experience with converting existing uses to higher density residential development, the current market demand for the existing use, analysis of any existing leases and contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.

In addition, the element is relying on more than 50 percent of the RHNA for lower-income households on nonvacant sites. The element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Finally, the element identifies sites with existing residential uses in the R-3, and R-4 zones. Absent a replacement housing policy, these sites are not adequate sites to accommodate lower-income households. The replacement housing policy has the same requirements as set forth in Government Code section 65915, subdivision (c), paragraph (3).

Sites Identified in Prior Planning Periods: Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within three years. The element should clarify if sites were identified in prior planning periods and if so, which sites and include a program if utilizing previously identified sites in the current planning period. For more information on program requirements, please see HCD’s Housing Element Sites Inventory Guidebook at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml.

Small Sites: The element appears to identify many sites that are smaller than a half-
These sites are not eligible to accommodate the RHNA for lower-income households absent a demonstration that sites of equivalent size and affordability were successfully developed during the prior planning period or unless other evidence is provided to demonstrate the suitability of these sites to accommodate the RHNA for lower-income households. For example, the element could analyze the potential for lot consolidation based on factors such as common ownership, past trends and characteristics leading to consolidation. Alternatively, the element could utilize these sites toward the moderate and above moderate-income RHNA. Based on the outcomes of this analysis, the element should add or modify policies and programs.

City-Owned Sites: The element describes several City-owned sites as opportunities for future development. However, the element must include additional discussion on each of the City-Owned sites identified to accommodate the RHNA. Specifically, the analysis should address existing uses and any known conditions that preclude development in the planning period, potential schedule for development, whether there are any plans to dispose of the properties during the planning period and compliance with the Surplus Land Act (Commencing with Government Code Section 54220).

Infrastructure: While the element generally describes water and sewer infrastructure, it must clarify sufficient existing or planned capacity to accommodate the RHNA or include programs if necessary.

For your information, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) The element must demonstrate compliance with this requirement or include a program as appropriate. In addition, local governments are required to immediately deliver the housing element to water and sewer service providers. For additional information and sample cover memo, see the Building Blocks at https://www.hcd.ca.gov/community-development/building-blocks/other-requirements/priority-for-water-sewer.shtml.

Environmental Constraints: While the element describes some environmental conditions such as air quality and noise, it must also describe how those conditions relate to identified sites and whether those or any other conditions preclude development in the planning period.

Accessory Dwelling Units (ADU): The element notes 160 ADU applications from January 2017 to August 2021 and based on this trend, assumed 34 ADUs per year. However, the element should utilize permitted units instead of applications to establish an annual trend and adjust assumptions as appropriate.

Electronic Site Inventory: Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory and submit an electronic version of the sites inventory. While the City has submitted an electronic version of the sites inventory, it must also
submit the electronic version of the sites inventory, including any changes, with the adopted element.

Zoning for a Variety of Housing Types:

- **Emergency Shelters:** The element indicates emergency shelters are permitted in the City's A-C and M-1 zones. However, the element must clarify whether emergency shelters are permitted without discretionary action and analyze capacity to meet the need for emergency shelters and any development standards, including parking requirements for consistency with statutory requirements. An analysis of capacity should address total acreage, typical parcel sizes, and any reuse or other opportunities. An analysis of development standards should list and evaluate any special regulations such as spacing and parking requirements. For example, parking requirements should not exceed the number of spaces necessary to accommodate staff. Based on the outcomes of this analysis, the element should add or modify programs.

- **Employee Housing:** The element should clarify compliance with the Employee Housing Act (Health and Safety Code, § 17000 et seq.) or add or modify programs to amend zoning. Specifically, section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone.

5. **An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5)).**

**Land Use Controls:** The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should address impacts on housing supply (e.g., number of units), costs, timing and ability to achieve maximum densities. The analysis should address parking, including the number of spaces and enclosure requirements, heights, and minimum lot sizes particularly for zones allowing multifamily uses. Based on the outcomes of a complete analysis, the element should include programs to address or remove the identified constraints.

In addition, the element (p. 246) notes the recent adoption of an ordinance to meet State Density Bonus Law (Government Code section 65915); however, it should either demonstrate this ordinance complies with current law or include a program to amend the ordinance as appropriate.

**Fees and Exactions:** The element lists some entitlement fees, but it should describe and
evaluate all required fees for single-family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability. For example, the analysis should identify the total amount of fees, including impact fees, and their proportion to the development costs for both a typical single-family and multifamily housing development.

**On/Off Site Improvements:** The element must identify subdivision level improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width), and analyze their impact as potential constraints on housing supply and affordability. As mentioned on (P.112) of the element, developers have concerns over the certainty of these infrastructure improvements. The element must provide programs to address any identified constraints on development. For additional information and a sample analysis, see the Building Blocks at [http://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml](http://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml).

**Housing for Persons with Disabilities:**

- **Reasonable Accommodation:** The element indicates the City has a reasonable accommodate procedure and describes the process for filing an application. However, the element should specifically list and evaluate any approval findings for constraints on housing for persons with disabilities.

- **Family Definition:** The element describes the City amended its definition in compliance with state law. However, the element should describe the actual definition and evaluate whether it constrains housing for persons with disabilities.

- **Community Care Facilities:** While the element identifies how community care facilities serving six or fewer persons are permitted, it must describe and analyze how community care facilities serving seven or more persons are approved including any approval findings or lack of zones allowing these housing types. The element should analyze the process and zones for potential constraints on housing for persons with disabilities and add or modify programs as appropriate to ensure zoning permits group homes for seven or more persons objectively with approval certainty.

**SB 35 Streamlined Ministerial Approval Process:** The element must clarify whether there are written procedures for the SB 35 (Chapter 366, Statutes of 2017) Streamlined Ministerial Approval Process and add a program, if necessary, to address these requirements.

**Zoning, Development Standards and Fees:** The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City’s website and add a program to address these requirements, if necessary.

6. **An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including…….the length**
Develop Densities and Timing of Approval: The element must analyze the length of time between receiving approval for a housing development and submittal of an application for building permits. The analysis should address any hinderances on the construction of a locality’s share of the regional housing need.

7. Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)

Farmworkers: According to the American Community Survey (ACS) 2014-2018 five-year estimate the element concludes that 0.13 percent of the population in Inglewood is employed in “agriculture, forestry, fishing, hunting and mining.” However, the ACS likely undercounts the needs of farmworkers, especially seasonal farmworkers. Furthermore, farmworkers from the broader areas and those employed seasonally may have housing needs, including within the City’s boundaries. As a result, the element should acknowledge the housing needs of permanent and seasonal farmworkers at a county-level (e.g., using USDA county-level farmworker data) and include programs as appropriate.

C. Housing Program

1. Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land-use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)

To have a beneficial impact in the planning period and address the goals of the housing element, programs should be revised to include discrete timelines (e.g., at least annually, by a date in the planning period) and specific commitment. Program to be revised with discrete timelines include 2 (New Affordable Multifamily), 3 (Intuit Dome Implementation), 9 (New Revenue Sources), 10 (Housing Grant Application), 12 (Long-Term Stewardship of Housing Subsidies), 15 (Review and Removal of Governmental...
Constraints) and 16 (Rehabilitate Affordable Rental). In addition, the following programs should be revised:

- **Program 8 (ADU):** The Program should be revised to monitor production and affordability of ADU with discrete timing (e.g., every other year) and take action (e.g., additional incentives, rezoning) within a specified time (e.g., six months).
- **Program 15 (Review and Removal of Governmental Constraints):** The Program should go beyond “reviewing” constraints and commit to revise requirements.

2. Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city’s or county’s share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)

As noted in Finding B4, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

- **Sites Identified in Prior Planning Periods:** If utilizing nonvacant sites identified in the prior planning period, the element must include a program. The program must be implemented within the first three years of the planning period and commit to zoning that will meet the density requirements for housing for lower-income households and allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower-income households.

- **Replacement Housing Requirements:** As noted in Finding B4, the element should include a housing replacement policy, absent a policy, sites noted in the R-3/R-4 zones, will not be considered adequate in meeting the City’s lower-income RHNA.

- **Program 6 (Public Land):** The Program should go beyond working with the development community and exploring opportunities and commit to a schedule of actions that facilitate development, including objectives commensurate with the assumptions in the sites inventory (243 units). A schedule of actions could include when sites will be identified, proposals will be issued and entitlements will be approved. In addition, the Program should commit to comply with the Surplus Land Act.
Shortfall of Sites: The element notes adoption of the Westchester/Veterans and Crenshaw/Imperial Transit Oriented Development Plans is anticipated by the end of 2021. If this zoning is necessary to accommodate the RHNA for lower-income households and the appropriate zoning was not available prior to the beginning of the planning period (before October 15, 2021), the element must include a program to rezone these areas by-right pursuant to Government Code sections 65583, subdivision (c)(1) and 65583.2, subdivisions (h) and (i).

3. Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)

As noted in Findings B5 and B6, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)

As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcomes of that analysis, the element must add or modify programs.

D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

While the element includes quantified objectives for new construction, rehabilitation, and conservation by income group, the element should also establish quantified objectives for ELI units that will be constructed, rehabilitated, and conserved/preserved during the current planning period.

E. Consistency with General Plan
The Housing Element shall describe the means by which consistency will be achieved with other general plan elements and community goals. (Gov. Code, § 65583, subd. (c)(7).)

While the element describes that consistency within the general plan is required, it should discuss how consistency was achieved as part of the housing element update and how consistency will be maintained throughout the planning period. To maintain consistency, the City could consider an internal consistency review as part of its annual general plan implementation report required under Government Code section 65400.
APPENDIX B.

Public Hearing Item PH-1 (Economic and Community Development Department) from the
City of Inglewood March 21st 2023 City Council Meeting Agenda

DATE: March 21, 2023
TO: Mayor and Council Members
FROM: Economic and Community Development Department
SUBJECT: Public Hearing - Consider Adoption of the 2021-2029 Housing Element
        (General Plan Amendment 2023-001)

RECOMMENDATION:
It is recommended that the Mayor and Council Members take the following actions:
1. Receive public comments;
2. Affirm Categorical Exemption (EA-CE-2023-002); and
3. Adopt a Resolution approving the 2021-2029 Housing Element (General Plan Amendment 2023-001).

BACKGROUND:
In February 2014, the City Council adopted the 5th Cycle Housing Element covering the period of October 2013 to October 2021.

In March 2020, the Southern California Association of Governments (SCAG) adopted the 2021-2029 Regional Housing Needs Assessment (RHNA) Allocation Plan, which distributed the region’s housing needs for the 2021-2029 period among SCAG jurisdictions.

In 2021, the City retained a consultant to prepare the update to the Housing Element using State grant funds. Throughout 2021, housing-related outreach was conducted and the update was drafted.

In January 2022, staff released the Draft Housing Element for public review and comment. In addition, the draft was submitted to the State Department of Housing and Community Development (HCD) for review. Subsequent drafts were submitted to HCD to comply with the requested revisions.

On January 23, 2023, the Planning Commission reviewed the Draft 2021-2029 6th Cycle Housing Element (Draft Plan) and adopted Resolution No. 1947 recommending approval to the City Council.

On January 31, 2023, the City Council set a Public Hearing for February 14, 2023 to consider the General Plan Amendment.

On February 14, 2023, the City Council continued the Public Hearing to February 28, 2023 to allow more time for HCD to complete their review of the Housing Element.