City of Santa Monica

City of Santa Monica Housing Authority
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January 11, 2016

Marcie Chavez, Director
Los Angeles Field Office
U.S. Department of Housing and Urban Development (HUD)
611 West Sixth Street, Suite 1040
Los Angeles, CA 90017

RE: Request to Increase the Santa Monica Enhanced Voucher Payment Standards

Dear Ms. Chavez,

Santa Monica is experiencing a rental housing crisis. Market rate rents have skyrocketed, vacancy rates are extremely low, and rental voucher holders from the Santa Monica Housing Authority (SMHA) are struggling to find places to live in our community. New SMHA voucher holders cannot compete in today's rental market and housed participants face threats to their housing stability as their rent burden increases without relief. So few rental residences are available at the current Exception Payment Standard that SMHA's lease-up and budget utilization rates are declining rapidly.

Demand for SMHA rental vouchers is stronger than ever, yet housing and retaining tenants in affordable housing in our community has never been more challenging. Consequently in the last two years SMHA has struggled to attain placement goals.

Pursuant to HUD 24 CFR Section 982.503, SMHA respectfully requests an increase to the citywide Housing Choice Voucher program area Exception Payment Standards, effective March 1, 2016. This written request demonstrates that an increase in the Santa Monica Exception Payment Standard is:

A. Necessary to prevent financial hardship for families;
B. Supported by statistically representative rental housing survey data;
C. Supported by an appropriate program justification that the proposed Exception Payment Standard amount is needed:
    - To help families find housing outside areas of higher poverty, or
    - Because voucher holders have trouble finding housing for lease under the program within the term of the voucher.

Ranking in the 4th to 7th percentile of market rents for 6,038 rental residences available within the past 24 months ('2013-15 Market Rents Period'), the SMHA Exception Payment Standards are severely inadequate and do not attract or retain property owners to the program. These low percentile rankings, shown in Table 1 below, demonstrate the extreme challenge that voucher holders experience locating residences in Santa Monica's rental market. Information about this data set is provided in *Section B: Statistically Representative Housing Survey Data* and the original raw data is available upon request.

Table 1: SMHA Payment Standard
Percentile Ranking Within 2013-15 Market Rents

Bedrooms	Payment Standard Est. March 2006	Percentile within BR
0	$1,009	6th percentile
1	$1,352	4th percentile
2	$1,843	4thpercentile
3	$2,411	7th percentile

HUD's approval of this request is critical for SMHA to place participants in homes, promote residential choice, de-concentrate poverty and fully utilize our budget allocation. SMHA requests the following payment standards, which are calculated by adding the 40th percentile of the 2013-15 Market Rents plus the 2016 SMHA utility allowances:

Table 2: Proposed 2016 SMHA Exception Payment Standard Calculation

Bedrooms	40th percentile of Santa Monica Market Rents in last 24 months	2016 SMHA Utility Allowance*	**Requested SMHA Exception Payment Standard**
0	$1,395	$117	**$1,512**
1	$1,800	$130	**$1,930**
2	$2,495	$145	**$2,640**
3, 4	$3,200	$166	**$3,366**

**Includes heating (gas), cooking (gas), other electric, water heating (gas), water, trash, range, refrigerator*

A. PREVENTING FINANCIAL HARDSHIP

This section of SMHA's request demonstrates why a higher Exception Payment Standard is needed in Santa Monica to prevent financial hardship for families.

Rent burden is a HUD-accepted indicator used to determine financial hardship, defined as spending more than 30 percent of household income on rent. The U.S. Census and American Community Survey track rent burden for the general population. The *Housing Choice Voucher Program Guidebook – Chapter 7 Payment Standards* requires PHAs to review assisted families rent burdens to determine payment standard adjustments.

Forty-four percent of Santa Monica households are rent burdened, spending more than 30 percent of their total income on housing and indicating an unmet need for rental vouchers, according to data from the 2005-2009 American Community Survey and reported in the City's *2013-2021 Housing Element*. Nearly 25 percent of the city's renter households experience severe overpayment, paying 50 percent of their income on rent.

Eighty-seven percent of SMHA's program participants are rent burdened, as shown in Table 3, demonstrating the need for increased payment standards. Specifically, Table 3 breaks down rent burden by level, and shows that 68 percent of participants are rent burdened, paying 30 to 39 percent of adjusted income on rent; 14 percent are heavily rent burdened, paying 40 to 49 percent of adjusted income on rent; and, 5 percent are severely rent burdened, paying over 50 percent of adjusted income on rent.

Additionally, 75 percent of SMHA head of households are elderly or permanently disabled (897 households) living on fixed incomes, making rent burden increasingly problematic with each year's rent increase. The median annual income for SMHA households is $10,913 per year, compared to the Los Angeles County's median household income of $55,870.

Table 3: Levels of Rent Burden
SMHA Participants

Rent Burden, Per Adjusted Income	# Households	Percentage of All Households	Total Rent Burdened Households
Rent Burdened *Paying 30-39 Percent of Income*	816	68%	**87%**
Heavily Rent Burdened *Paying 40-49% of Income*	166	14%	
Severely Rent Burdened *Paying >= 50% of Income*	66	5%	
Not Rent Burdened *Paying <30% of Income*	155	13%	

In Santa Monica, assisted families are often rent burdened by the cumulative impact of annual rent increases, which tenants pay out of pocket in the absence of higher payment standards, or because of the initial rent amounts associated with living in a high rent area. An increased Exception Payment Standard will improve housing placement rates for new voucher holders and decrease the financial hardship of rent burden for existing voucher holders.

B. STATISTICALLY REPRESENTATIVE HOUSING SURVEY DATA

To demonstrate the need for a new SMHA Exception Payment Standard, this section provides statistically representative rental housing survey data, and describes the limitations of rental vouchers and affordable housing production programs in the current market.

Rental Housing Survey Data

HUD requires that payment standard increase requests demonstrate need with statistically significant data. To obtain a margin of error of 1 and 95 percent degree of confidence with the full set of 33,602 Santa Monica rental residences, SMHA would need to cull information from a data set of 7,469 rental residences (22 percent). The City data set, established 16 years ago to track rent controlled units, includes 28,069 rental residences (84.9 percent). Within the City data set, a total of 6,038 rental residences were vacated and rented during the 2013-15 Market Rental Period

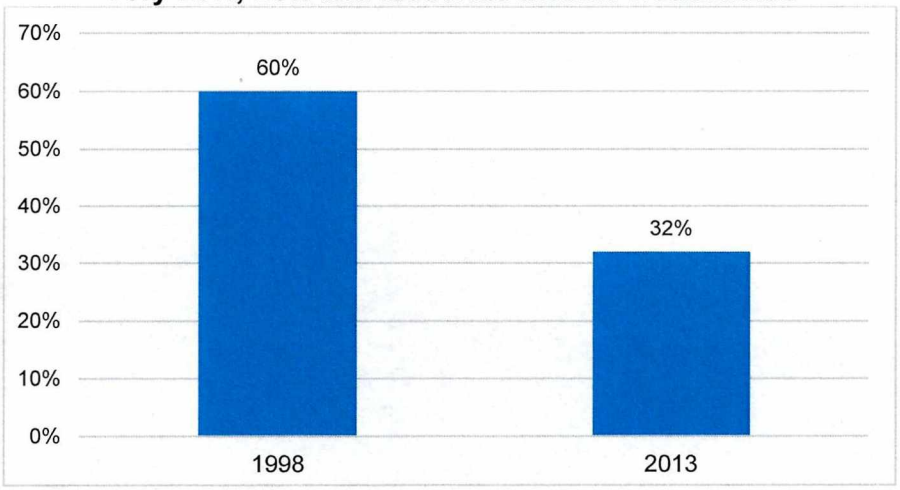
(December 1, 2013 and November 30, 2015). Data regarding the actual rent charged is captured and included in the data.

The rental data maintained by the City reveals dramatic escalation of rental housing costs in Santa Monica since Rent Control ended in 1995, allowing property owners to charge market rents on previously rent-controlled apartments upon vacancy ('vacancy decontrol'). When the long-term tenants vacate residences, owners often lease these residences at double or even triple the rent that the departing tenants paid. The net effect has been a dramatic reduction in the number of apartments that are affordable to very low, low and moderate income households and the erosion of a critical housing options for Section 8 voucher holders.

Among Santa Monica rental residences, 8,977 (27.2 percent) remain rent controlled, 18,776 (56.8 percent) were rented at market rents upon vacancy, and 316 (1 percent) are likely rented to owners and their families or used for nonresidential purposes. Another 4,993 rental residences (15.1 percent) are not part of the original rent controlled housing stock, and are not included in the City tracked rental data set.

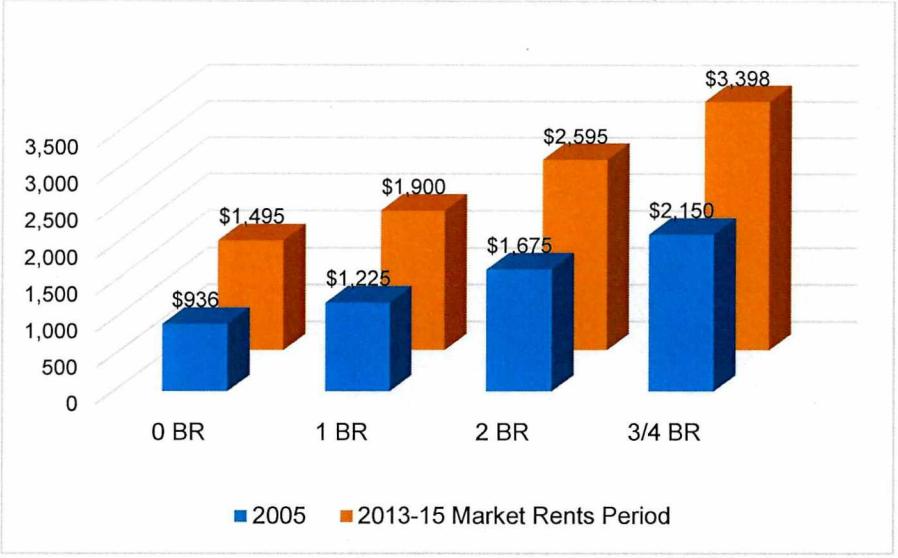
From 1998 to 2014, the total housing supply affordable to very-low, low and moderate income households in Santa Monica declined from 60 percent to 32 percent as shown in Figure A below. In the meantime, high rents and high real estate sales prices are incentives for landlords to evict tenants paying below current market rents.

Figure A: Change in Percentage of Santa Monica Residences Affordable to Very Low, Low and Moderate Income Households



During the 2013-2015 Market Rents Period, 6,038 formerly rent-controlled multifamily residences in Santa Monica became vacant and re-occupied by new tenants at market rents. During this 24-month period, the median market rents by bedroom size were as follows: 0 BR at $1,495 per month; 1 BR at $1,900 per month; 2 BR at $2,595 per month; and 3/4 BR at $3,398 per month. Compared to market rents in 2005, the last time Santa Monica's payment standard was adjusted, 2013-15 Market Rents Period median rents have increased 55 to 60 percent as shown below in Figure B.

Figure B: Median Market Rent Increases Since Last Payment Standard Request



Recent university and private sector research corroborates the City rental data findings. With an effective rent of $2,618 per unit across bedroom sizes, the *2014 USC Casden Multifamily Forecast* ranked Santa Monica/Marina Del Rey as the submarket with the highest average rent in the entire Southern California region, exceeding all submarkets in Los Angeles County, Orange County, the Inland Empire (Riverside, and San Bernardino Counties) and San Diego County. The report also projects an 8.4 percent increase in rent levels from 2014 to 2016. More recent data from the *Marcus & Millichap 2015 Annual Apartment Forecast* shows a 2015 Santa Monica/Marina del Rey effective submarket rent of $3,132 per unit, and predicts a 6 percent increase in 2016. Additionally, as shown in Table 4, staff analyzed 501 Westside Rentals listings on December 1, 2015. Westside Rentals is a Santa Monica-based rental listing service. Median asking rents were $1,980 for 0 BR, $2,850 for 1 BR, $3,740 for 2 BR and $5,800 for 3 BR residences. These asking rents ranged from 24 to 41 percent above the City data set median rents. Westside Rentals medians are higher than the City data set medians because the City data set includes only apartments that are at least 35 years old, while Westside Rentals includes newer units that command higher rents.

Table 4: City Data Set Median Rents Compared to Private Rental Listings Median Rents

BRs	2013-15 Market Rents Median Rents (City Data Set)	Westside Rentals Median Rents December 1, 2015	Westside Rentals Median Rents % Above City Data Set
0 BR	$1,495	$1,980	24%
1 BR	$1,900	$2,850	33%
2 BR	$2,595	$3,740	31%
3/4 BR	$3,398	$5,800	41%

Rental Vacancy Rates
In addition to market rents date, the vacancy rate is another indicator used to gauge how effectively rental residences are meeting a community's housing demand. Vacancy rates between 5 and 6 percent generally indicate a balance between housing demand and supply. For the most recent three year period, as shown in Table 5 below, the American Community Survey indicated almost a full point drop in Santa Monica's rental vacancy rate, from 3.7 to 2.8 percent. Similarly, the *Casden Forecast* reported that the Santa Monica/Marina Del Rey submarket rental vacancy rates declined from 4.1 percent to 2.9 percent from 2009 to 2013. Additionally, the *Marcus & Millichap 2015 Annual Apartment Forecast* reported a 2014 Santa Monica/Marina del Rey rental vacancy rate of 2.9 percent, and predicted that the vacancy will decrease to 2.3 percent in 2015.

Table 5: Rental Vacancy Rates

Data Source	Rental Vacancy Rate
ACS 2010-2014	2.8%
ACS 2009-2013	3.6%
ACS 2008-2012	3.7%

Deed Restricted Housing's Role and Limitations
In Santa Monica, the market impacts of vacancy decontrol have coupled with the repercussions of the State of California's 2012 dissolution of the Santa Monica Redevelopment Agency to create intense demand for very low and low income housing.

Prior to the dissolution of Redevelopment, the City operated an aggressive two-part affordable housing production program:

1) City-Funded Affordable Housing: The City spent approximately $15 million annually for deed-restricted affordable housing production and preservation, and the City's nonprofit developers produced an average of 51 residences per year over the last 21 years. With the loss of Redevelopment, the City anticipates approximately $2 million will be available each year, merely 13 percent of its former resources. Using an average City acquisition and development subsidy for affordable units from 1982 to 2015, the current funding level would produce only six affordable residences per year.

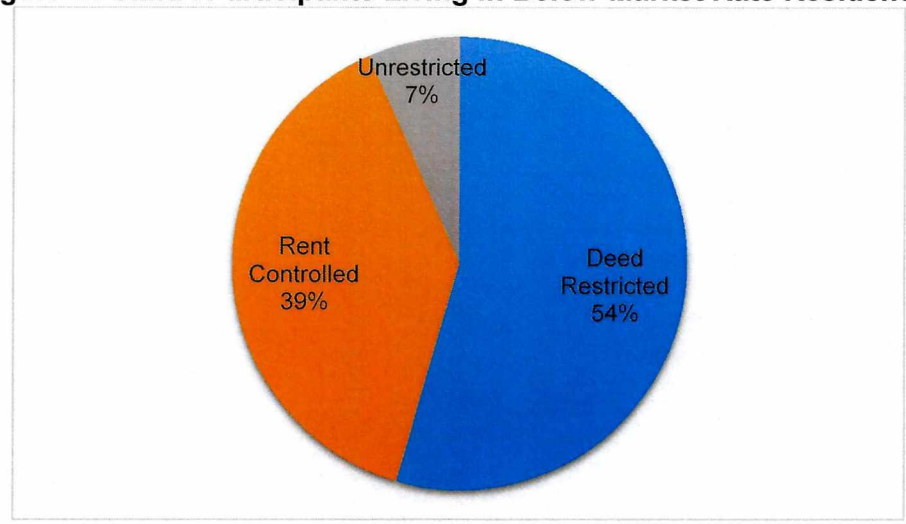
2) Market-Rate Developer Affordable Housing: The City requires developers of market housing to build a portion of deed-restricted affordable housing on-site or pay for off-site affordable housing, and we anticipate that this program will continue however it is dependent on market circumstances. On average, developers of market housing have produced 35 deed-restricted apartments per year over the last 21 years.

Even when operating at full capacity, the City's production programs were not able to keep pace with the loss of affordably priced rent control residences. For example, from 2009 to 2014 a total of 2,979 long-term rent-controlled residences were rented at market rates and City programs produced 880 deed-restricted affordable residences, resulting in a net loss of 2,099 affordable residences.

The intention of the City's affordable housing production programs are to complement SMHA's rental voucher programs and serve as many families as possible. Instead, due to addressing the impacts of market pressures on voucher holders, these programs now house 54 percent of voucher holders and overlap significantly. Figure C below provides a breakdown of the types of residences that SMHA participants live in. Currently, only 7 percent of voucher holders (84

households) reside in non-restricted apartments in Santa Monica and 93 percent of SMHA voucher holds (1,123 of 1,203 households) live in either rent control or deed restricted residences.

Figure C: SMHA Participants Living in Below-Market Rate Residences



In the face of diminished production resources, declining rent control housing stock, and very low turnover rates for affordable residences, even fewer voucher holders will locate housing unless the Exception Payment Standard is increased to match market levels.

C. PROGRAM JUSTIFICATIONS

Providing Participants Housing Opportunities in Areas Outside of Higher Poverty
A higher Exception Payment Standard is needed in Santa Monica to help families find housing outside areas of high poverty. Santa Monica is an excellent place for families wanting to relocate out of high poverty neighborhoods. Santa Monica provides excellent schools, plentiful grocery and retail outlets, low-crime rate, a strong and well-funded nonprofit social services network, and a high performing local government. Local transit options include the Big Blue Bus, Metro Bus, Dial-a-Ride, a newly instituted bike share program and, in early 2016, the Expo light rail line will connect Santa Monica to train systems throughout Los Angeles County.

There is a strong correlation between which census tracts SMHA tenants find residences in and the poverty levels of the census tracts (Data source: ACS 2011). The increasing rents in Santa Monica are forcing voucher holders to cluster in the least expensive areas of the city, resulting in housing patterns that are in direct conflict with SMHA's and HUD's goal to deconcentrate poverty. More than half (52 percent) of SMHA's participants live in the City's three highest poverty tracts, which are adjacent to one another and shown in Table 6 below.

Table 6: SMHA Households in High Poverty Census Tracts

Census Tract	# SMHA Households	Percentage of SMHA Households	ACS 2011 Poverty %
701902	238	20%	21.4%
701802	165	14%	19.6%
701801	222	18%	16.3%
702002	43	4%	16.3%
701702	103	9%	15.6%
702300	89	7%	14.9%
701502	26	2%	11.4%
701402	58	5%	11.3%
701701	28	2%	10.2%
702201	49	4%	9.9%
702102	41	3%	9.5%
701302	28	2%	9.4%
701602	38	3%	7.3%
701501	34	3%	7.1%
701601	4	0%	6.5%
702202	17	1%	6.3%
701304	16	1%	4.9%
701202	4	0%	4.7%
701201	0	0%	2.4%

With the Exception Payment Standards as proposed, SMHA's participants will transform from being unable to lease a residence to being competitive in the marketplace. Table 7 below shows that housing opportunities will improve substantially with the proposed payment standard, increasing available residences for voucher holders from 4 percent of available units to 53 percent of available units. Moreover, the 24-month market rental data indicates that the proposed payment standard will make more units available throughout the city. Census tract level data for this table is provided as Appendices B and C.

Table 7: Residences Available to Voucher Holders With Current and Proposed Payment Standards

Rental Residences	Total	Percent	Available Per Month
Total leased over 24 months November 2013 to October 2015	6,037	100%	252
Available to voucher holders within current payment standard	259	4%	11
Would be available to voucher holders with proposed payment standard	3,184	53%	133

Voucher Holders Have Difficulty Finding Housing Within the Voucher Term

A higher Exception Payment Standard is needed in Santa Monica to help voucher holders locate housing within the term of their vouchers.

SMHA's lease up rate is declining, and new and 'port in' Section 8 voucher holders are rarely able to secure housing. As a result, SMHA's placement rates are very low for families seeking to relocate out of high poverty neighborhoods into Santa Monica's moderate and high income neighborhoods.

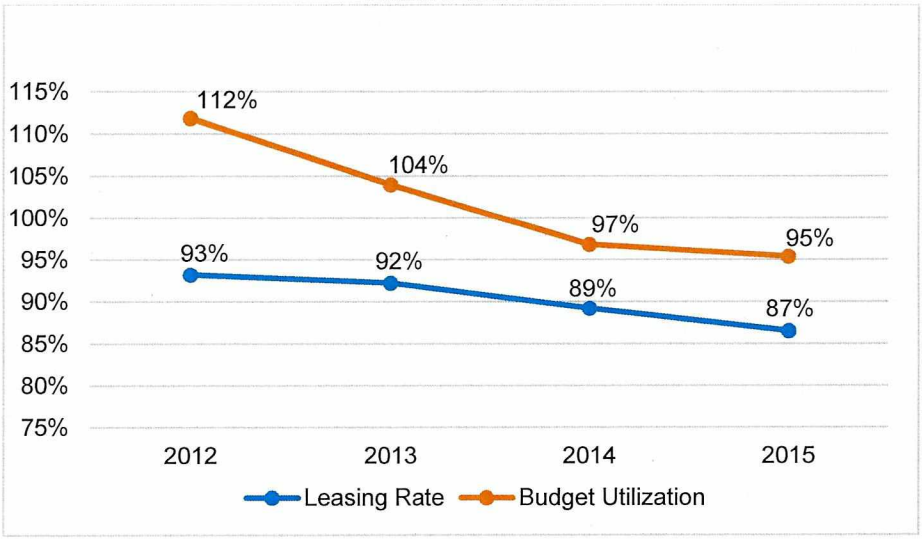
SMHA's lease up rate is languishing under current market pressures and conditions. During a 24 month period beginning November 2013, SMHA received a total of 132 port requests of which 32 households were able to locate housing in Santa Monica. Of those who located housing, only one household leased a market residence and the remainder rented deed restricted affordable residences. The average search time was 91 days. For the same period, SMHA issued 26 new Housing Choice Vouchers of which 16 were able to locate housing. The average search time was 108 days. Of those who located housing, 3 households leased market residences and 13 rented deed-restricted affordable residences.

Table 8: SMHA Voucher Move-Ins
November 2013 to October 2015

Type of Voucher Holder Searching for Housing	Total	# Did Not Locate Housing	# Located Housing	# Located Housing In Market Rate
Porting Vouchers	132	100	32	1
New Vouchers	26	10	16	3
Total	158	110	48	4
Percentage	100%	70%	30%	< 1%

In an environment with few market units available for rent at the Exception Payment Standard, SMHA's lease up rate and budget utilization rates are declining dramatically as shown in Figure D below. Comparing CY 2013 to CY 2015, the total number of units leased decreased drastically. Total units leased dropped from 12,083 in CY 2013 to 11,339 in CY 2015 equaling a total reduction of 744 units in just two years. This number translates to an average decrease of 31 units per month. Santa Monica Housing Authority's total ACC is 13,104 units; the Unit Months Leased percentage dropped from 92% to 87% during this period according to the Voucher Management System (VMS).

Figure D: Leasing Rate and Budget Utilization
SMHA 2012-15



Conclusion
Thank you for considering the Santa Monica Housing Authority's request to increase its Exception Payment Standard.

By approving this request, we hope that HUD will continue our partnership to help us achieve our mission to provide quality housing to very low and low income families, and to specifically address the following challenges:

- Market rents that are significantly above the current SMHA payment standard thereby precluding housing placements;
- Low rental vacancy rates that impede timely housing placements and are predicted to trend even lower;
- Mounting rent burdens for SMHA participants and the general Santa Monica public that are creating financial hardships; and,
- Decreasing lease up rates and budget utilization that continue trending downward due to the conditions described in this request.

Please let me know if you require any additional information. I can be reached at barbara.collins@smgov.net and 310-458-8710.

Sincerely,

Barbara Collins
Housing Manager
Santa Monica Housing Division

2016 SMHA Exception Payment Standard Request
Appendices

Appendix A	Summary of SMHA Review of Payment Standard Adjustment Factors
Appendix B	Number of Residences Available to Voucher Holders With Current and Proposed Payment Standards, By Census Tract
Appendix C	Distribution of Residences Available to Voucher Holders With Current and Proposed Payment Standards, By Census Tract
Appendix D	Map of SMHA Households in High Poverty Census Tracts

Appendix A
2016 SMHA Review of Payment Standard Adjustment Factors Summary
Housing Choice Voucher Program Guidebook, Chapter 7 Payment Standards

Items PHA should review annually to determine whether adjustments are needed	**Description**	**SMHA Data Provided in Request**
Assisted Families Rent Burdens	Percentage of income voucher families use to pay rent to determine the extent to which rent burdens exceed 30 percent of income	Rent Burdened Families: 87 percent of SMHA families
Availability of Suitable Vacant Residences with Rents Below the Payment Standards	Rent reasonableness data	Rent reasonableness data is attached as Appendix A City Rental Data Set.
	Vacancy rate data	Vacancy rate: 2.8 percent and trending downward
	Other relevant information to determine whether there is an ample supply of vacant residences with rents below the payment standard amounts particularly in areas with low concentrations of poor and minority families	SMHA current payment standards are in the 4th through 7th percentile of market rents during the past 24 months. • 51 percent of SMHA tenants are living in three high poverty census tracts. A higher payment standard would offer them housing options in higher income neighborhoods thereby meeting HUD's goals for housing choice and the deconcentration of poverty.
Time to Locate Housing	Average time required for voucher holders to find residences. If the PHA determines that the amount of time is excessive (90 days or more) an increase in the payment standard amount may be needed.	Average time to locate housing is 91 days for porting vouchers and 110 days for new vouchers, which HUD rates as excessive.
Vouchers Expired without Leasing	Number of vouchers holders whose voucher expire without having leased a unit. While some voucher dropout is expected, a substantial number of families unable to lease residences with assistance under the housing choice voucher program suggests that payment standard amount may be too low.	Number of vouchers expired without leasing from November 2013 to October 2015 (24 month period): • 10 out of 26 new vouchers expired without leasing. • 100 out of 132 porting vouchers either expired or requested to return to the original Housing Authority. • Combined, 110 out of 158 voucher holders (70 percent) were not able to locate housing in Santa Monica during the term of their search.
Large Number of Families Moving Out of the PHA's Jurisdiction	Number of families exercising the portability option to lease in other jurisdictions. Again, while some exercise of portability is to be expected, and may in fact indicate that the PHA is meeting its objectives in expanding housing opportunities for participating families, an excessively high number of families moving out may indicate that the PHA's payment standard amounts are too low.	Number of families porting out of Santa Monica: • 16 households ported out of Santa Monica from November 2013 to October 2015.

Appendix B – Number of Residences Available to Voucher Holders
With Current and Proposed Payment Standards, By Census Tract

Totals from Table 7 broken out by census tract. Color coded with red for the lowest counts, green for highest counts, white for the median. With the current payment standards it is possible for a voucher holder to not find a residence to apply for even if they are diligently searching. The proposed payment standards would not only give voucher holders opportunities but options for housing. See Appendix C for more on housing options.

	Residences Rented in Santa Monica From 2013-2015 For Less Than Current Payment Standard				Residences That Could Have Been Rented in Santa Monica From 2013-2015 For Less Than Proposed Payment Standard			
Bedrooms	**0**	**1**	**2**	**3, 4**	**0**	**1**	**2**	**3, 4**
Census Tracts								
701201	0	0	0	0	1	0	2	0
701202	0	1	0	1	5	40	28	9
701302	0	3	1	0	22	120	86	14
701304	0	5	2	0	5	42	22	0
701402	6	4	0	0	88	105	88	5
701501	3	2	1	1	18	119	72	14
701502	1	8	3	1	28	131	79	10
701601	2	1	0	0	6	32	21	3
701602	2	3	1	2	17	69	48	8
701701	10	5	10	0	20	76	61	9
701702	1	4	7	2	23	108	79	10
701801	2	27	25	2	13	262	78	17
701802	1	6	9	4	19	64	60	9
701902	0	3	3	0	19	13	5	0
702002	4	8	1	0	26	99	42	1
702102	1	4	5	4	29	113	39	7
702201	5	10	3	2	36	91	86	9
702202	0	2	0	1	9	44	31	6
702300	7	23	4	0	43	124	46	1
Total	45	120	77	20	427	1653	975	132

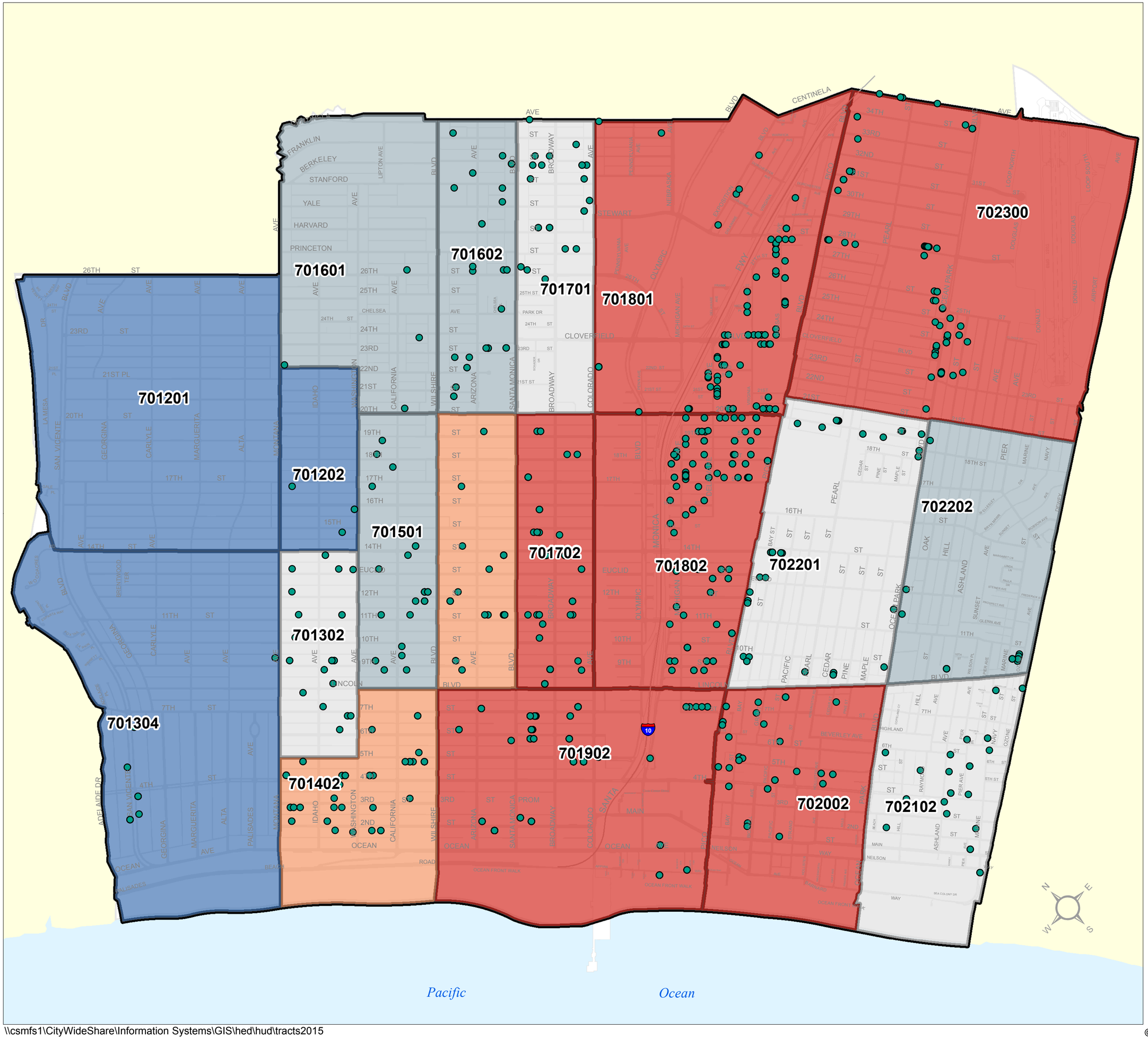
Appendix C – Distribution of Residences Available to Voucher Holders
With Current and Proposed Payment Standards, By Census Tract

The charts below provide distribution percentages based on the counts in Appendix B and are color coded with white as the lowest, teal as the median, red as the highest. With the current payment standards voucher holders' housing opportunities are concentrated in specific census tracts. The census tract with the highest overall concentration is already one of the tracts with highest poverty (see Table 6). With the proposed payment standards voucher holders' housing opportunities are spread much more evenly across the City.

	Distribution of Residences Rented in Santa Monica From 2013-2015 For Less Than Current Payment Standard					Distribution of Residences that Could Have Been Rented in Santa Monica From 2013-2015 For Less Than Proposed Payment Standard				
Bedrooms	**0**	**1**	**2**	**3, 4**	**Overall**	**0**	**1**	**2**	**3, 4**	**Overall**
Census Tracts										
701201	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
701202	0%	1%	0%	5%	1%	1%	2%	3%	7%	3%
701302	0%	3%	1%	0%	2%	5%	7%	9%	11%	8%
701304	0%	4%	3%	0%	3%	1%	3%	2%	0%	2%
701402	13%	3%	0%	0%	4%	21%	6%	9%	4%	7%
701501	7%	2%	1%	5%	3%	4%	7%	7%	11%	7%
701502	2%	7%	4%	5%	5%	7%	8%	8%	8%	8%
701601	4%	1%	0%	0%	1%	1%	2%	2%	2%	2%
701602	4%	3%	1%	10%	3%	4%	4%	5%	6%	5%
701701	22%	4%	13%	0%	10%	5%	5%	6%	7%	5%
701702	2%	3%	9%	10%	5%	5%	7%	8%	8%	7%
701801	4%	23%	32%	10%	21%	3%	16%	8%	13%	13%
701802	2%	5%	12%	20%	8%	4%	4%	6%	7%	5%
701902	0%	3%	4%	0%	2%	4%	1%	1%	0%	1%
702002	9%	7%	1%	0%	5%	6%	6%	4%	1%	5%
702102	2%	3%	6%	20%	5%	7%	7%	4%	5%	6%
702201	11%	8%	4%	10%	8%	8%	6%	9%	7%	7%
702202	0%	2%	0%	5%	1%	2%	3%	3%	5%	3%
702300	16%	19%	5%	0%	13%	10%	8%	5%	1%	6%

CITY OF SANTA MONICA

SMHA Households in High Poverty Census Tracts



ACS 2011 Poverty %

- 0.115 - 0.214
- 0.103 - 0.114
- 0.074 - 0.102
- 0.050 - 0.073
- 0.024 - 0.049
- Households

City of Santa Monica®

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