4.   AFFIRMATIVELY FURTHERING FAIR HOUSING

AB 686 established new requirements for all California jurisdictions to ensure that local laws, programs, and activities affirmatively further fair housing. All Housing Elements due on or after January 1, 2021 must contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing Final Rule of April 23, 2020.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor. Under State law, affirmatively further fair housing means "taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These characteristics can include, but are not limited to race, religion, sex, marital status, ancestry, national origin, color, familiar status, or disability.

State law also prohibits discrimination in the development process or in real property transactions, and it is the County's policy to uphold the law in this regard. The Fair Housing Council of Orange County (FHCOC), a private non-profit fair housing group, is under contract to administer a wide variety of fair housing services to residents of Orange County. These services include:

- Serving as a fair housing resource for the region, including implementation of an affirmative fair housing marketing plan, testing, and complaint verification;

- Responding to all citizen complaints regarding violation of fair housing laws;

- Providing tenant-landlord counseling to all inquiring citizens;

- Promoting community awareness of tenant-landlord rights and responsibilities;

- Reporting monthly on complaint processing;

- Providing fair housing education to residents, County staff, community organizations, agencies, and service providers;

- Increasing the supply of affordable housing in high opportunity areas;

- Preventing displacement of low- and moderate-income residents, seniors, and people with disabilities;

- Increasing community integration for persons with disabilities;

- Ensuring equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness; and

- Expanding access to opportunities for protected classes.

Needs Assessment

On June 23, 2020, the Board of Supervisors approved the FY 2020-24 County of Orange Analysis of Impediments to Fair Housing. The purpose of this document is to affirmatively further fair housing opportunities, and is required for communities that administer federal programs, such as Community Development Block Grant, Emergency Solution Grant, and HOME.

The County of Orange Analysis of Impediments to Fair Housing Choice (AI) is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). The AI also outlines fair housing priorities and goals to overcome fair housing issues. In addition, the County of Orange AI lays out meaningful strategies that can be implemented to achieve progress towards the County's obligation to affirmatively furthering fair housing.

Outreach

The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with Orange County jurisdictions and with input from a wide range of stakeholders through a community participation process, prepared the AI. Stakeholders included tenants, landlords, homeowners, fair housing organizations, civil rights and advocacy organizations, legal and social services providers, housing developers, and industry groups. The Lawyers' Committee met with stakeholders throughout the County, organized community meetings, and held focus group meetings with nonprofit organizations and government officials.

Fair Housing Issues

As required by federal regulations, the AI draws from various federal, state and local sources to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically

concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs.

The AI discusses two impediment categories: public and private sector impediments, which include housing discrimination, advertising, reasonable modifications and accommodations, hate crimes, real estate and lending practices, as well as zoning regulations. Additionally, the AI identifies the actions that will be undertaken by each jurisdiction to overcome the public and private sector impediments. The analysis also examines publicly supported housing in each city as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The AI identifies contributing factors to fair housing issues and steps to be taken by each jurisdiction to overcome these barriers.

Lending Practices

Table 3-8 displays the disposition of loan applications for the Anaheim-Santa Ana-Irvine MSA/MD, per the 2019 Home Mortgage Disclosure Act report. Key findings, as shown in the table, include:

- Very low-income applicants (less than 50 percent of the MSA/MD median income) are more likely to have a loan application denied. The highest rates of denial were amongst those who identify as American Indian/Alaska Native (52.3 percent) and Native Hawaiian or Other Pacific Islander (44.2 percent).
- Above moderate-income applicants (at least 120 percent of the MSA/MD median income) experienced the highest rates of loan approvals. Within this income category, those who identify as White had the lowest percentage of denied applications (11.3 percent), while those who identify as Black or African American had the highest percentage of denials (17.3 percent).
- Across all income categories, applicants who identified as White had the highest rates of loan approvals.
- Overall, applicants who identified as White made the majority of all loan applications, followed by applicants who identified as Asian, then Hispanic, or Latino.

Analysis of Federal, State, and Local Data and Local Knowledge

Summary of Local Knowledge Analysis

As a part of the Housing Element, the County considers protected class (such as race, ethnicity, income, etc.) and opportunity indicators as key factors in fair housing. Federal, state and local data provide regional context, background

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information and supportive data which helps the County to understand fair housing issues and to identify key fair housing factors for Orange County. The section below uses available data to identify key trends and local contributing factors to fair housing.

Integration and Segregation Patterns and Trends

The dissimilarity index is the most commonly used measure of segregation between two groups, reflecting their relative distributions across neighborhoods (as defined by census tracts). The index represents the percentage of the minority group that would have to move to new neighborhoods to achieve perfect integration of that group. An index score can range in value from 0 percent, indicating complete integration, to 100%, indicating complete segregation. An index number above 60 is considered to show high similarity and a segregated community.

It is important to note that segregation is a complex topic, difficult to generalize, and is influenced by many factors. Individual choices can be a cause of segregation, with some residents choosing to live among people of their own race or ethnic group. For instance, recent immigrants often depend on nearby relatives, friends, and ethnic institutions to help them adjust to a new country. Alternatively, when White residents leave neighborhoods that become more diverse, those neighborhoods can become segregated. Other factors, including housing market dynamics, availability of lending to different ethnic groups, availability of affordable housing, and discrimination can also cause residential segregation.
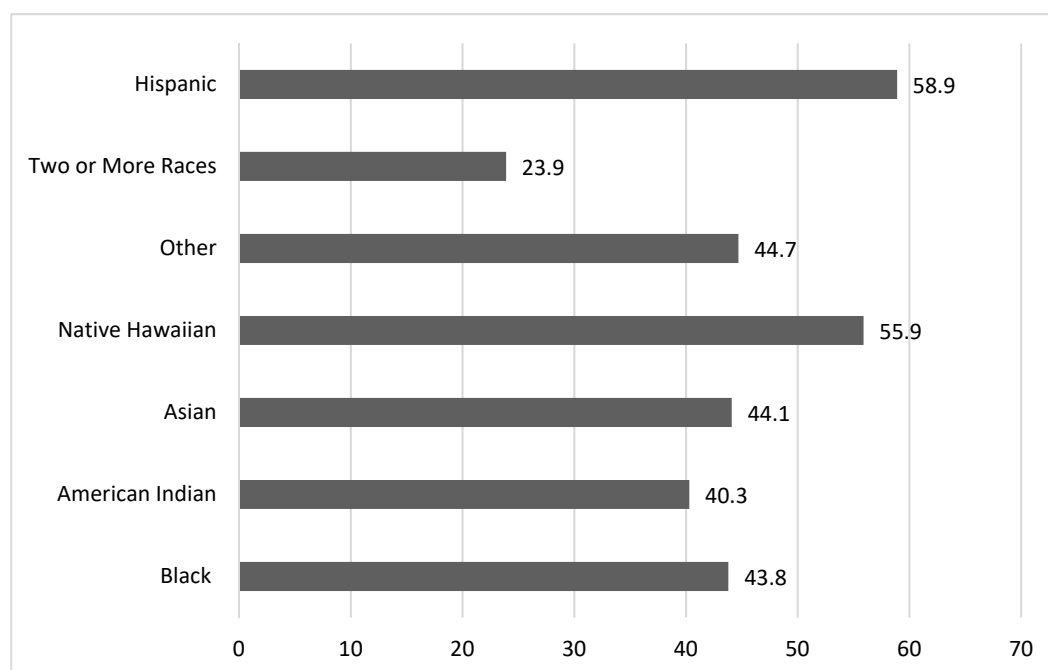
Figure 4-1 shows the dissimilarity between each of the identified race and ethnic groups and Orange County's White population. The higher scores indicate higher levels of segregation amongst those race and ethnic groups. The White population within Orange County makes up most of the County's population with approximately 61 percent identifying as White alone (non-Hispanic or Latino) according to 2019 American Community Survey (ACS) 5-Year estimates.

Those who identify as Hispanic and those who identify as Native Hawaiian had the highest scores (58.9 and 55.9, respectively). Additionally, those who identify as Asian and Black also had high dissimilarity scores with 44.1 and 43.8, respectively. Those scores correlate directly with the percentage of people within that racial or ethnic group that would need to move into a predominantly White census tract to achieve a more integrated community. For instance, 58.9 percent of the Hispanic population would need to move into a predominantly White census tract to achieve "perfect" integration.

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The Department of Housing and Community Development (HCD) considers dissimilarity index scores above 30 as moderate segregation and scores above 60 high segregation. While the County has no racial or ethnic populations with a dissimilarity index above 60, all populations aside from those identifying as two or more races have a score above 30. This means almost all groups experience moderate segregation from the White population. While segregation may be a result of ethnic enclaves or persons of similar cultures living nearby, there is often increased likelihood that segregated areas have fewer access to essential resources. As part of the County's efforts to further fair housing, the County will consider increased targeted outreach to the County's minority residents.

Figure 4-1
Dissimilarity Index with White Population in Orange County

Hispanic	58.9
Two or More Races	23.9
Other	44.7
Native Hawaiian	55.9
Asian	44.1
American Indian	40.3
Black	43.8

Source: Census Scope, Social Science Data Analysis Network

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the

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poverty threshold, AFFHI Documentation (June 2013) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40 percent or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

Location of residence can have a substantial effect on mental and physical health, education opportunities, and economic opportunities. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation. However, these areas may also provide different opportunities, such as ethnic enclaves providing proximity to centers of cultural significance, or business, social networks and communities to help immigrants preserve cultural identify and establish themselves in new places. Overall, it is important to study and identify these areas to understand patterns of segregation and poverty in the County.

Figure 4-2 below displays the R/ECAP analysis of the Orange County area. The figure shows there are five pockets of racially or ethnically concentrated areas of poverty in the northern and central areas of Orange County. There are also R/ECAPs in neighboring communities to the north and to the west. The County is committed to increasing housing mobility throughout Orange County and the region. This Housing Element outlines housing opportunities, affordable housing, and fair housing strategies to increase opportunities to all households.

Figure 4-2
R/ECAP Areas in Orange County
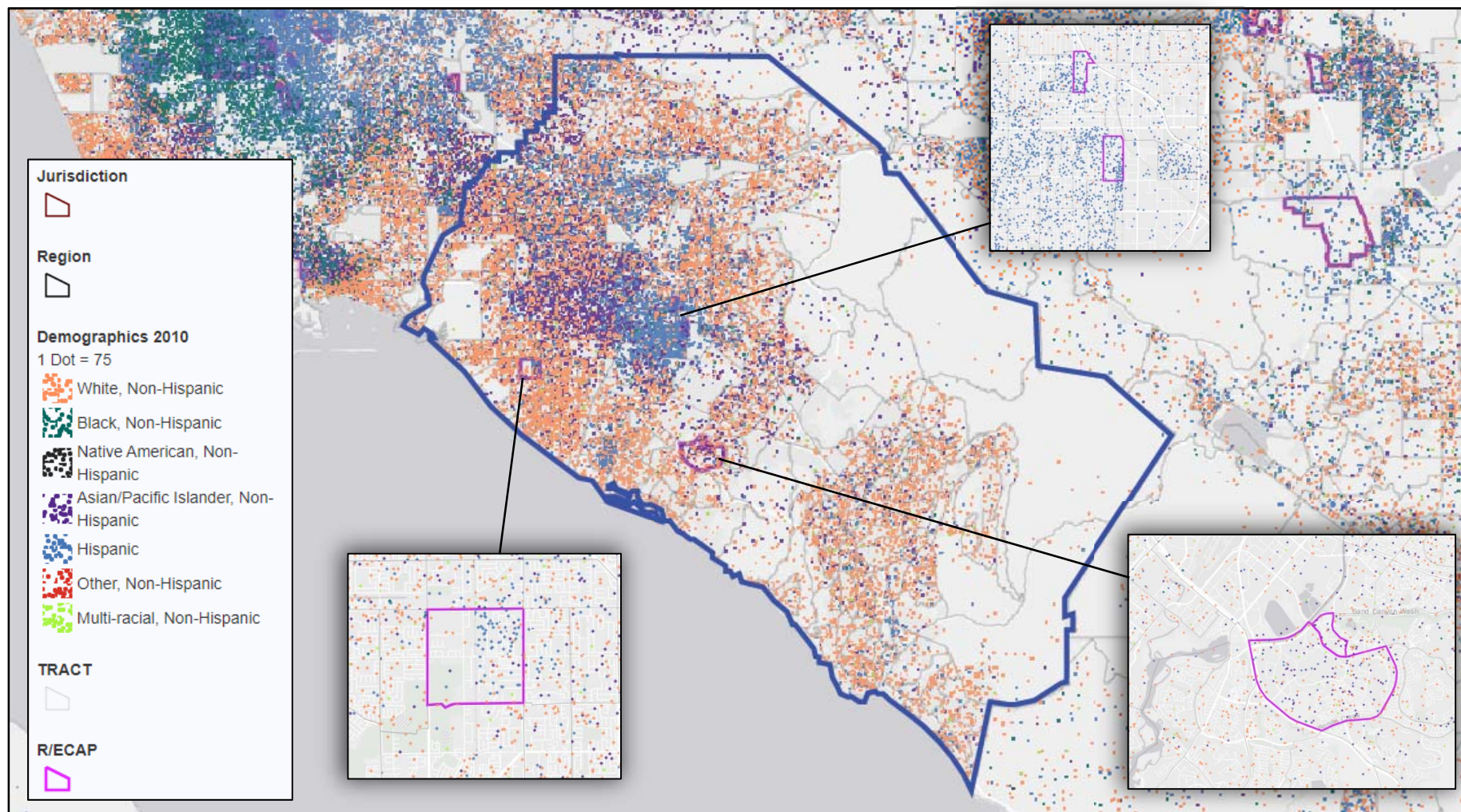
Source: HUD Affirmitaevly Furthering Fair Housing Data and Mapping Tool, Data Versions: AFFHT0006, July 10, 2014

Disparities in Access to Opportunity

REGIONAL OPPORTUNITY INDEX (ROI)

The UC Davis Center for Regional Change and Rabobank partnered to develop the Regional Opportunity Index (ROI) intended to help communities understand local social and economic opportunities. The goal of the ROI is to help target resources and policies toward people and places with the greatest need to foster thriving communities. The ROI incorporates both "people" and "place" components, integrating economic, infrastructure, environmental, and social indicators into a comprehensive assessment of the factors driving opportunity."

The ROI: People is a relative measure of people's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life as follows:

- **Educational Opportunity**: Assesses people's relative success in gaining educational assets, in the form of a higher education, elementary school achievement, and regular elementary school attendance.

- **Economic Opportunity**: Measures the relative economic well-being of the people in a community, in the form of employment and income level.

- **Housing Opportunity**: Measures the relative residential stability of a community, in the form of homeownership and housing costs.

- **Mobility/Transportation Opportunity**: Contains indicators that assess a community's relative opportunities for overcoming rural isolation.

- **Health/Environmental Opportunity**: Measures the relative health outcomes of the people within a community, in the form of infant and teen health and general health.

- **Civic Life Opportunity**: A relative social and political engagement of an area, in the form of households that speak English and voter turnout.

The ROI: Place is a relative measure of an area's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life.

- **Education Opportunity**: Assesses a census tract's relative ability to provide educational opportunity, in the form of high-quality schools that meet the basic educational and social needs of the population.

- **Economic Opportunity**: Measures the relative economic climate of a community, in the form of access to employment and business climate.

- **Housing Opportunity**: Measures relative availability of housing in a community, in the form of housing sufficiency and housing affordability.

- **Health/Environment Opportunity**: A relative measure of how well communities meet the health needs of their constituents, in the form of access to health care and other health-related environments.

- **Civic Life Opportunity**: Measures the relative social and political stability of an area, in the form of neighborhood stability (living in same residence for one year) and US citizenship.

As the figures show, the majority of Orange County is classified as high opportunity zones with pockets of low opportunity in the north central area. This indicates generally high levels of relative opportunities that people can achieve as well as high levels of relative opportunities that the County provides. Table 4-1 below identifies the County's overall opportunity indicators compared to the State. The data shows the following key findings:

- The County has higher rates of college educated adults, high school graduates, and UC/CSU eligible students.

- Orange County residents experience higher employment rates and minimum basic income rates than the State. The County has a higher job availability rate and higher job quality.

- Orange County has a higher home ownership rate, but the cost housing affordability rate is lower than the State.

- Commute times are higher in Orange County, but County residents have higher access to vehicles.

- Overall health and environmental opportunities are comparable to the State. However, Orange County has higher access to prenatal care and health care availability.

- Orange County has comparable voting rates as the State, but Orange County residents have lower English-speaking rates and lower citizenship rates.

Table 4-1
Local and State Regional Opportunity Indicators
for Place and People

	ROI Indicator	Orange County	California
	People		
Education	College Educated Adults	44%	38%
	Math Proficiency	77%	70%
	English Proficiency	72%	65%
	Elementary Truancy	16%	24%

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	ROI Indicator	Orange County	California
Economic	**Place**		
	High School Graduation Rate	92%	83%
	UC/CSU Eligibility	48%	41%
	Teacher Experience	54%	36%
	High School Discipline Rate	4%	6%
	People		
	Employment Rate	92%	89%
	Minimum Basic Income	70%	64%
	Place		
	Job Availability	859.93	701.75
	Job Quality	42%	40%
	Job Growth	2%	3%
	Bank Accessibility	0.27	0.24
Housing	**People**		
	Home Ownership	58%	55%
	Housing Cost Burden	52%	52%
	Place		
	Housing Advocacy	89%	91%
	Housing Affordability	0.16	0.19
Mobility	**People**		
	Vehicle Availability	90%	86%
	Commute Time	61%	60%
	Internet Access	4.70	4
Health and Environment	**People**		
	Infant Health	95%	95%
	Birth to Teens	5%	7%
	Years of Life Lost	23.37	29.84
	Place		
	Air Quality	10.44	10.01
	Prenatal Care	90%	83%
	Access to Supermarket	53%	53%
	Health Care Availability	2.28	1.76

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ROI Indicator		Orange County	California
Civic Life	**People**		
	Voting Rates	31%	31%
	English Speakers	87%	88%
	Place		
	US Citizenship	81%	83%
	Neighborhood Stability	85%	85%

Source: UC Davis Center for Regional Change and Rabobank, 2014.

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Figure 4-3
Regional Opportunity Index: People, 2014

Regional Opportunity Index: People, 2014

Description

The Regional Opportunity Index (ROI): People is a relative measure of people's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life.

Legend

Regional Opportunity Index: People

Some data not available

Lowest Opportunity

Highest Opportunity

Date: 7/21/2021

https://interact.regionalchange.ucdavis.edu/roi/

UC DAVIS
CENTER FOR REGIONAL CHANGE

Source: UC Davis Center for Regional Change and Rabobank, 2014

Figure 4-4
Regional Opportunity Index: Place, 2014

Regional Opportunity Index: Place, 2014

Description

The Regional Opportunity Index (ROI): Place is a relative measure of an area's assets in education, the economy, housing, mobility/transportation, health/environment, and civic life.

Legend

Regional Opportunity Index: Place

- Some data not available
- Lowest Opportunity
- Highest Opportunity
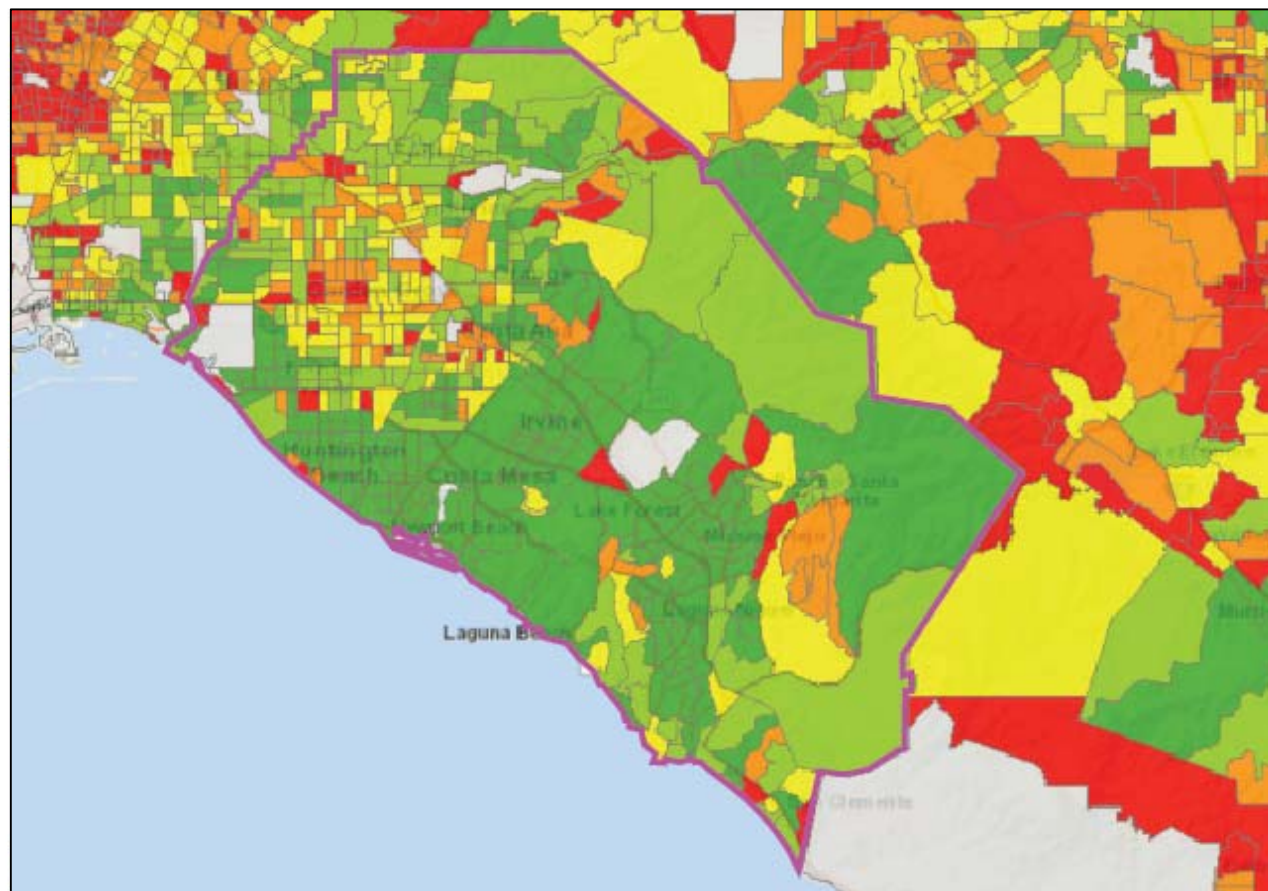
Date: 7/21/2021

https://interact.regionalchange.ucdavis.edu/roi/

UCDAVIS
CENTER FOR REGIONAL CHANGE

Source: UC Davis Center for Regional Change and Rabobank, 2014

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CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE – TCAC/HCD

State HCD together with the California Tax Credit Allocation Committee (TCAC) established the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to State HCD and other related state agencies/departments to further the fair housing goals (as defined by State HCD). The Task force developed the TCAC/HCD opportunity Area Maps to understand how public and private resources are spatially distributed. The Task force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.

According to the Task Force's methodology, the tool allocates 20% of the tracts in each region with the highest relative index scores to the "Highest Resource" designation and the next 20% to the "High Resource" designation. Each region then ends up with 40% of its total tracts as "Highest" or "High" resource. These two categories are intended to help State decision-makers identify tracts within each region that the research suggests low-income families are most likely to thrive, and where they typically do not have the option to live—but might, if given the choice. As shown in Figure 4-4a below, Orange County has large pockets of low resource and high segregation and poverty areas surrounded by moderate to high resource communities. The Cities of Anaheim, Santa Ana, Westminster, Lake Forest, and San Juan Capistrano have concentrations of low resources areas. The high segregation and poverty areas are mostly found in the north-central region of the County. The County is committed to exploring programs and methods of increasing housing access and opportunity to both existing residents, future residents, and households in nearby areas.

Figure 4-4a
Regional Opportunity Index: Place, 2014
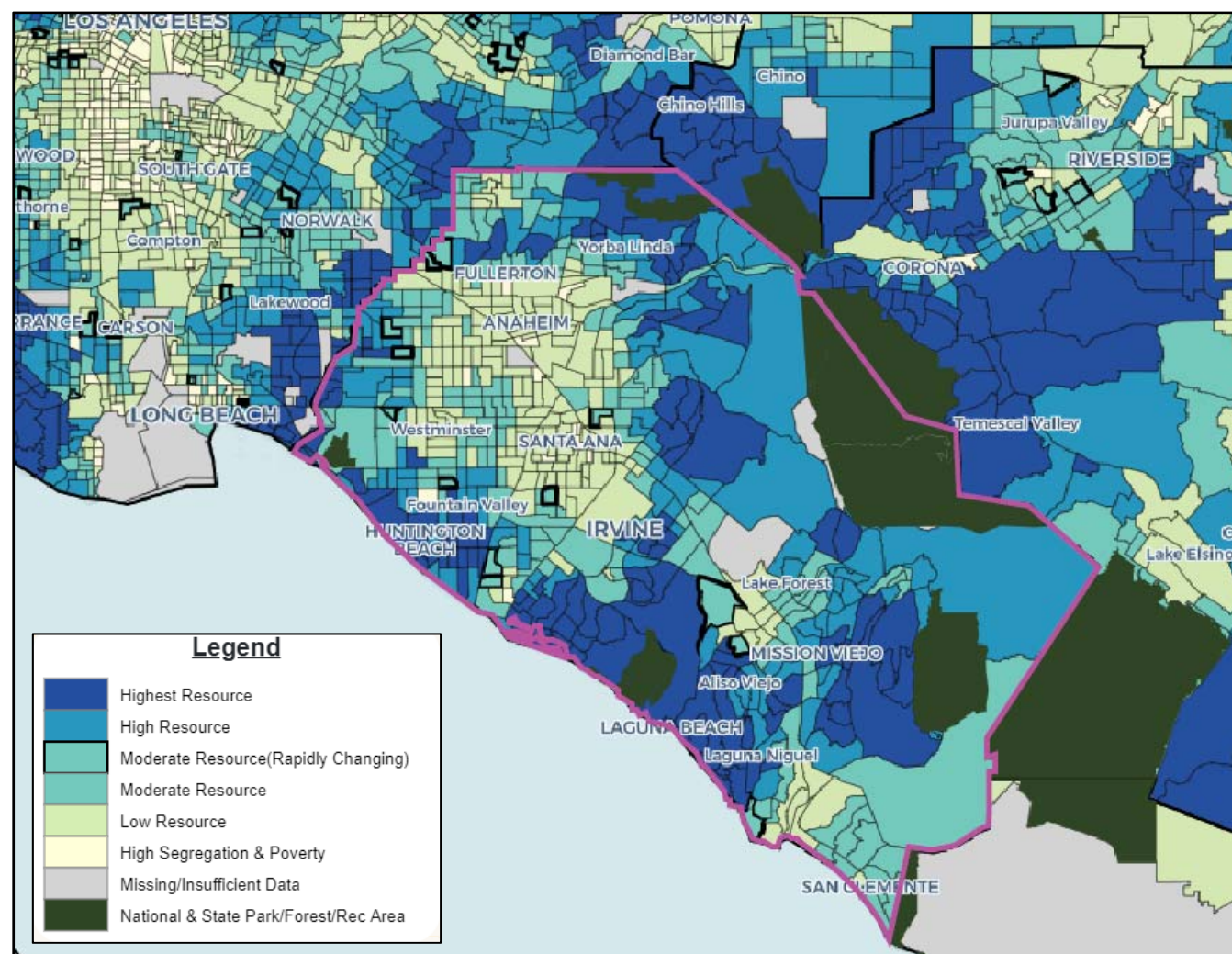
Source: California Tax Credit Allocation Committee and Department of Housing and Community Development, 2021.

ACCESS TO TRANSIT

AllTransit, which is an online database that tracks connectivity, access, and frequency in America, explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the data provided in **Table 4-2,** the County scored a 4.2 AllTransit performance score, illustrating a moderate access to public transit to commute to work. Access to transportation increases both economic and environmental/health opportunities. As **Figure 4-5** shows, the north-western portion of the county is well connected. The eastern region is made up of mountainous area which decreases accessibility; however, there is a lack of connectivity in the southern region of Orange County.

Table 4-2
Transit Indicators by Region, Orange County, 2021

Jurisdiction	AllTransit Performance Score	Transit Trips Per Week within ½ Mile	Jobs Accessible in 30-Min Trip	Commuters Who Use Transit	Transit Routes Within ½ Mile
Orange County	4.2	528	172,595	2.28%	4

Source: AllTransit, American Community Survey, 2019.

Figure 4-5
AllTransit Performance Score – Orange County
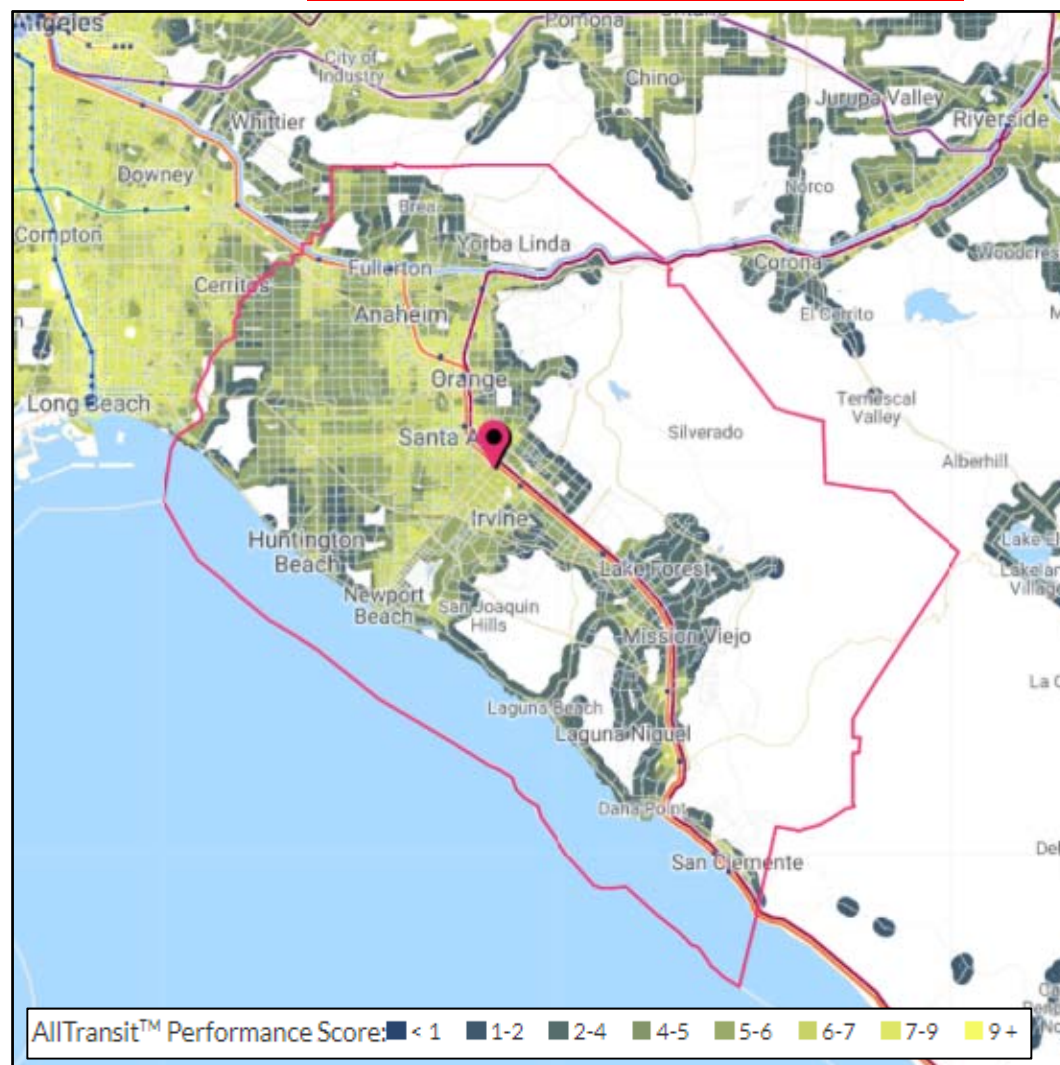
Source: AllTransit Metrics, ACS 2019

ENVIRONMENTAL JUSTICE

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviro Screen). In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviro Screen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty,

and unemployment. Research has shown a heightened vulnerability of people of color and lower socioeconomic status to environmental pollutants.

The CalEnviro Model is made up of a suite of 20 statewide indicators of pollution burden and population characteristics associated with increased vulnerability to pollution's health effects. The model identifies areas of health risk by conducting the following:

- Uses a weighted scoring system to derive average pollution burden and population characteristics scores for each census tract.

- Comparing these scores for a given census tract to the other tracts in the state by multiplying the pollution burden and population characteristics components together.

- The final CalEnviroScreen score measures the relative pollution burdens and vulnerabilities in one census tract compared to others and is not a measure of health risk.

Figure 4-6 shows the central and northern region of the County are generally high scoring. The majority of the southern area of the county is low scoring and has low pollution burdens. Overall, high scores signify high pollution burdens and high exposure to harmful pollutants, specifically for residents in low-income census tracts. Low-income residents, or areas with higher percentages of low-income households are often disproportionately affected by poor environmental quality. Providing housing options near essential resources and economic opportunity/jobs can decrease overall vehicle miles travelled (VMT), which in many cases is related to air quality. Additionally, the County may work with developers to implement and increase the use of environmentally friendly materials and strategies.

Figure 4-7 shows census tract 6059087805 is generally high scoring with a CalEnviroScreen3.0 percentile of 80 - 85 percent. Most of this census tract is located within the Cities of Stanton and Anaheim, but there is an unincorporated area at the Northwest corner of Magnolia Avenue at Katella Avenue. This tract has a Pollution Burden Percentile of 85. Pollution Burden scores are derived from the average percentiles of the seven Exposure indicators (ozone and PM2.5 concentrations, diesel PM emissions, drinking water contaminants, pesticide use, toxic releases from facilities, and traffic density) and the five Environmental Effects indicators (cleanup sites, impaired water bodies, groundwater threats, hazardous waste facilities and generators, and solid waste sites and facilities). For the seven Exposures indicators and the five Environmental Effects indicators, the tract scored 53 in ozone, 66 in PM 2.5 (air quality), 34 in diesel, 67 in pesticides, 94 in toxic releases, 69 in traffic, 37 in drinking water, 82 in cleanups, 43 in groundwater threats, 83 in hazardous waste, 0 in impaired water, and 33 in solid waste. This tract contains 17 percent Children under 10 years in age. The average in California census tracts is 13 percent. The tract also contains 7 percent Elderly over 65. The average in California census tracts is 12 percent.

Figure 4-8 shows census tract 6059087806 is generally high scoring with a CalEnviroScreen3.0 percentile of 75 - 80 percent. Most of this census tract is located within the Cities of Stanton and Anaheim, but there is an unincorporated area South of Cerritos Avenue, West of Gilbert Street, and North of Katella Avenue. This tract has a Pollution Burden Percentile of 54. For the seven Exposures indicators and the five Environmental Effects indicators, the tract scored 53 in ozone, 66 in PM 2.5 (air quality), 34 in diesel, 38 in pesticides, 95 in toxic releases, 66 in traffic, 37 in drinking water, 13 in cleanups, 52 in groundwater threats, 31 in hazardous waste, 0 in impaired water, and 0 in solid waste. This tract contains 17 percent Children under 10 years in age. The tract also contains 7 percent Elderly over 65.

Figure 4-9 shows that census tract 6059052404 is indicated as High Population, Low Population with a total population of 549. Most of this census tract is located within the City of Irvine, but there is an unincorporated area within the census tract, which is a portion of the site for James A. Musick Facility. This tract has a Pollution Burden Percentile of 98. For the seven Exposures indicators and the five Environmental Effects indicators, the tract scored 65 in ozone, 33 in PM 2.5 (air quality), 63 in diesel, 95 in pesticides, 87 in toxic releases, 64 in traffic, 39 in drinking water, 74 in cleanups, 85 in groundwater threats, 88 in hazardous waste, 41 in impaired water, and 84 in solid waste. This tract contains 0 percent Children under 10 years in age. The tract also contains 0 percent Elderly over 65.

Figure 4-6
CalEnviro Screen 3.0, Orange County
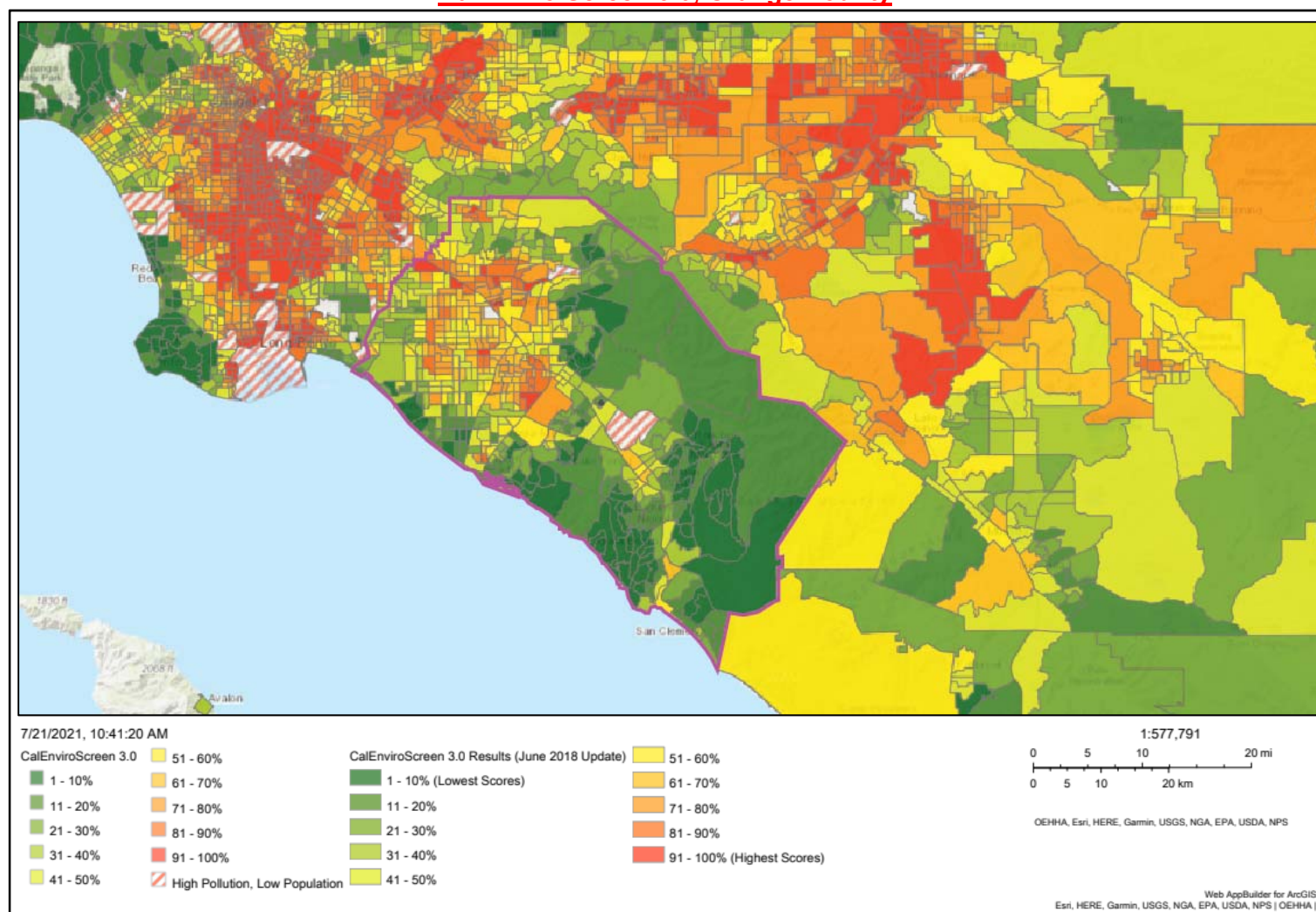
Source: CalEnviro Screen 3.0 Map Tool, June 2018 Update. Accessed July 21, 2021
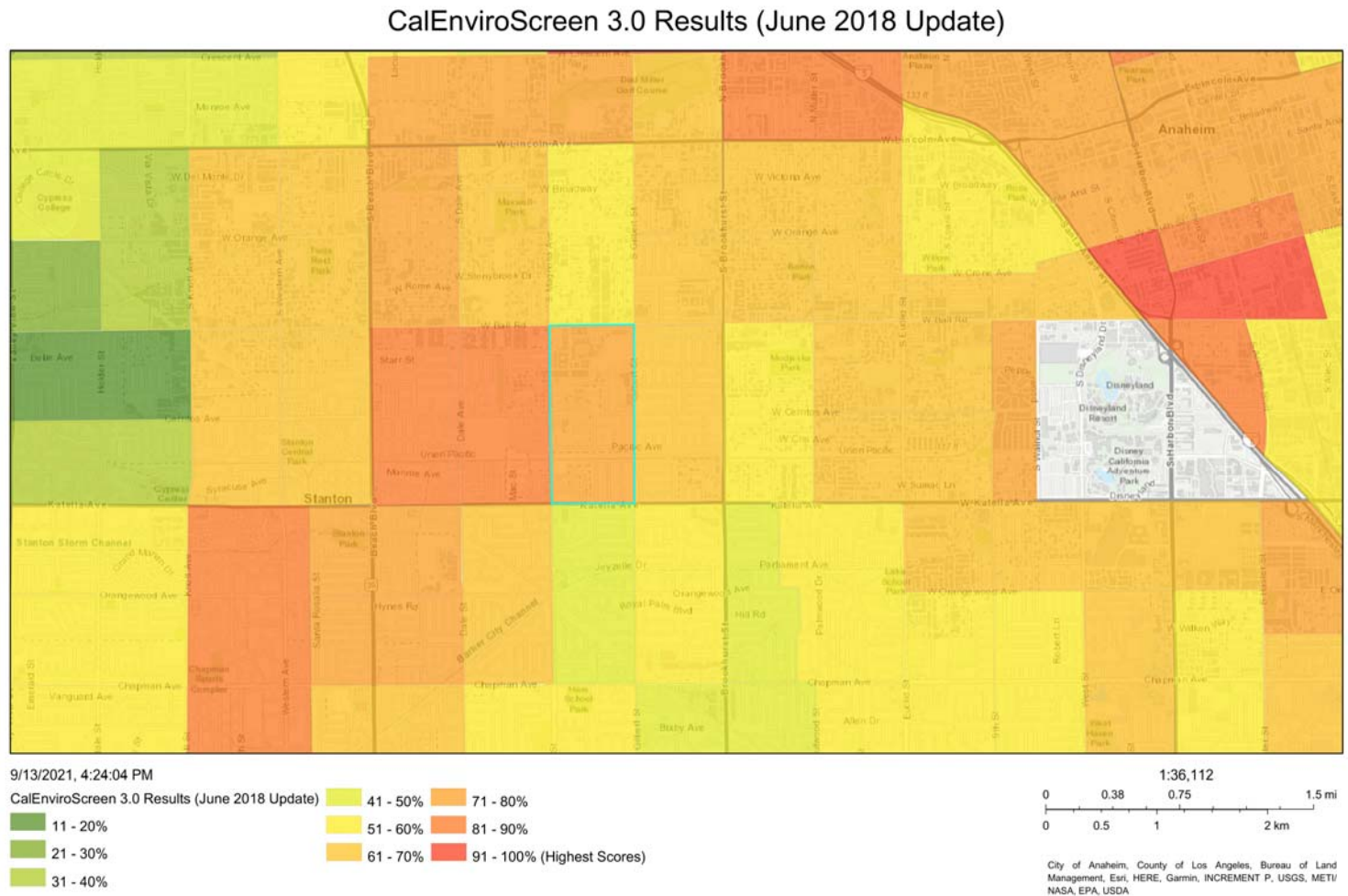
Figure 4-7
CalEnviro Screen 3.0, Orange County, Parcel 6059087805
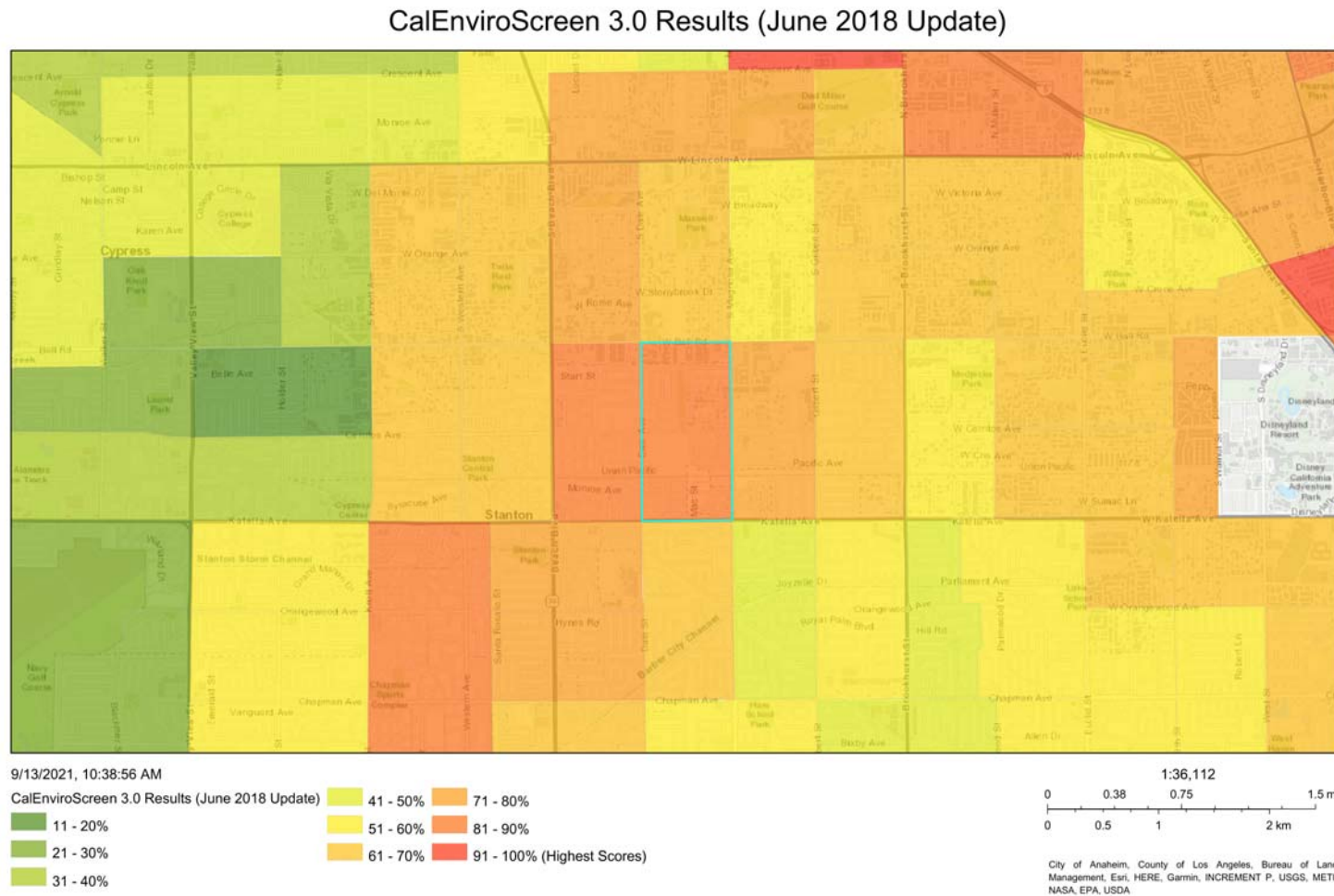
Source: CalEnviro Screen 3.0 Map Tool, June 2018 Update. Accessed September 13, 2021
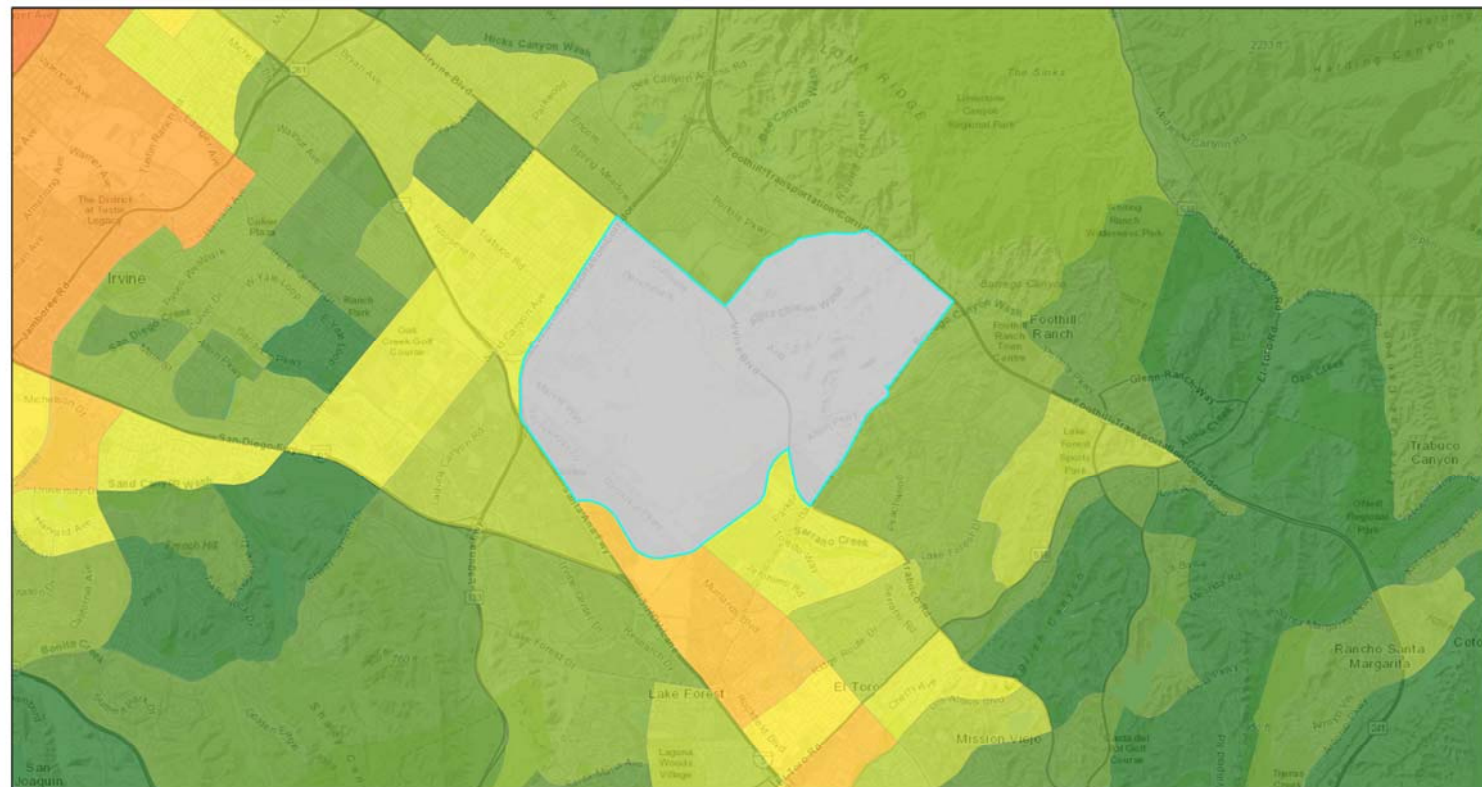
**Figure 4-8
CalEnviro Screen 3.0, Orange County, Parcel 6059087806**

Source: CalEnviro Screen 3.0 Map Tool, June 2018 Update. Accessed September 13, 2021

Figure 4-9
CalEnviro Screen 3.0, Orange County, Parcel 6059052404
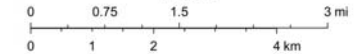
Source: CalEnviro Screen 3.0 Map Tool, June 2018 Update. Accessed September 13, 2021

Discussion of Disproportionate Housing Needs

The analysis of disproportionate housing needs within the County of Orange evaluates existing housing needs, need of the future housing population, and units within the community at-risk of converting to market-rate.

EXISTING NEEDS

The Orange County Housing Authority administers Section 8 Housing Choice vouchers within the County. According to the 2021 Annual PHA Plan, the Housing Authority has allocated 11,306 choice vouchers.

FUTURE HOUSING NEEDS IN THE COUNTY OF ORANGE

A variety of factors affect housing needs for different households. In particular, disability, income and other household characteristics are taken into consideration when proposing the type and size of housing units needed by different households, as well as accessibility of housing based on existing units in a jurisdiction. **Table 4-3** through **4-9** show data for demographic characteristics of the County, as compared to the State of California. Additional detailed analysis of the community's demographics is outline in the Community Profile of this Housing Element.

Table 4-3 displays the data for persons with disabilities in the County in comparison to the State. Persons with disabilities may require different features in a home to make housing more accessible, this includes, but is not limited to, ramps rather than stairs, lower and within reach counter tops, and other specific design features. Overall, the Orange County region has lower percentages of persons with disabilities compared to the State. Persons with ambulatory difficulties (a physical and permanent disability to such a degree that the person is unable to move from place to place without the aid of a wheelchair) and independent living difficulties represented the largest percentages of persons with disabilities in the County; this is the same in for California as a whole.

Table 4-3
Population by Disability Type

Disability*	Orange County	California
Hearing Difficulty	2.5%	2.9%
Vision Difficulty	1.5%	2%
Cognitive Difficulty	3.4%	4.3%
Ambulatory Difficulty	4.5%	5.8%
Self-Care Difficulty	2.2%	2.6%
Independent Living Difficulty	4.3%	5.5%
Total with a Disability	8.5%	10.6%

* Total of noninstitutionalized population with at least one disability.
Source: American Community Survey, 5-Year Estimates, 2019.

Tables 4-4 and **4-5** display household type and income data for the County and the State. Amongst the two jurisdictions, households categorized as "family" made up the largest percent of households overall. Orange County has a higher percentage of family households than the state. Family households with children represent the same percentage for the County as the State, and represent larger percentages than non-family households. Households with children may require different or additional design standards and are often larger to accommodate additional persons to avoid overcrowding.

Table 4-5 shows that Orange County has a higher household income than the State overall. Just under 50% of households in Orange County earn an annual income over $100,000, while 37.7% of households in California earn that same amount. Generally, a higher percentage of married couple households typically result in a high median income in a community as these households may have more than one income source. Higher income provides means for safe and sufficient housing, as well as, the ability to update and renovate older attributes of the home.

Table 4-4
Population by Familial Status

Familial Status	Orange County	California
Family Households	71.7%	68.7%
Married-Couple Family Households	54.9%	49.8%
With Related Children Under 18	34.1%	34%
Female Households, No Spouse	11.5%	13%
Non-Family Households	28.3%	31.3%
Households with One or More People 60 Years+	39.9%	39.1%
Total Households	1,037,492	13,044,266

Source: American Community Survey, 5-Year Estimates, 2019.

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Table 4-5
Households by Income

Household Income	Orange County	California
Less than $10,000	4.2%	4.8%
$10,000-$14,999	2.7%	4.1%
$15,000-$24,999	5.6%	7.5%
$25,000-$34,999	6%	7.5%
$35,000-$49,999	8.8%	10.5%
$50,000-$74,999	14.6%	15.5%
$75,000-$99,999	12.8%	12.4%
$100,000-$149,999	18.6%	16.6%
$150,000-$199,999	11.1%	8.9%
$200,000 or More	15.5%	12.2%
Median Income	$90,234	$75,235

Source: American Community Survey, 5-Year Estimates, 2019.

Table 4-6 displays data for households experiencing overpayment or cost burden in the County and State. Housing cost burden has a number of consequences for a household, such as displacement from their current home creating limited access to essential goods and employment by potentially increasing commute times. The HUD Consolidated Planning/CHAS Data shows that Orange County and California have very similar figures with both reporting approximately 40 percent of households paying more than 30 percent of their income for housing. Just under 20 percent of households in both jurisdictions pay at least 50 percent of their income for housing. Such a cost burden removes available income from other necessities such as food.

Table 4-6
Households by Income

Overpayment	Orange County	California
Cost Burden >30%	40.5%	40.1%
Cost Burden >50%	19.3%	19.4%
Cost Burden Not Available	1.4%	1.4%

Source: American Community Survey, 5-Year Estimates, 2019.

Table 4-7 displays data for household tenure (owner vs. renter) for Orange County and California. Homeownership is a crucial foundation for helping families with low incomes build strength, stability, and independence. The opportunity for transition into the homebuyer's market is important for persons and households in different communities as homeownership allows for increased stability and opportunity to age in place. The data shows that just above half of Orange County and California households own their own home (57.4 percent and 54.8 percent, respectively).

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Table 4-7
Households by Income

Household Tenure	Orange County	California
Owner Households	57.4%	54.8%
Renter Households	42.6%	45.2%
Total Occupied Housing Units	1,037,492	13,044,266

Source: American Community Survey, 5-Year Estimates, 2019.

Table 4-8 displays data for overcrowding in the County and the State. Overcrowding is defined as 1.01 to 1.5 persons per bedroom living in a household, and severe overcrowding is defined as more than 1.51 persons per bedroom. Overcrowding often occurs when nonfamily members combine incomes to live in one household, such as roommates. It also occurs when there are not enough size appropriate housing options for larger or multigenerational families. The data shows there are more overcrowded renter households in the County than the State (4.2 percent and 3.6 percent, respectively). Overcrowding in owner households are similar for both jurisdictions. The data shows that overcrowding disproportionately affects renter households over owner households.

Table 4-8
Households by Overcrowding

Overcrowding and Tenure	Orange County	California
Owner Households		
Overcrowded	1.5%	1.6%
Severe Overcrowded	0.6%	0.6%
Renter Households		
Overcrowded	4.2%	3.6%
Severe Overcrowded	2.6%	2.4%

Source: American Community Survey, 5-Year Estimates, 2019.

HOUSING STOCK

Table 4-9 display comparative housing stock data for Orange County and California for overcrowded housing units by type. A variety of housing stock provides increased opportunity in communities for different size and household types. The data shows that half of Orange County housing units are single-family, detached units. The State reports a slightly higher percentage; however, it has a much lower percentage of single-family, attached units than Orange County (7 percent and 12.3 percent, respectively). Multi-family housing developments of 10 or more units are of similar percentages for both jurisdictions, with 19.1 percent for Orange County and 17.5 percent in California.

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Table 4-9
Overcrowded Housing Units by Type

Housing Unit Type	Orange County	California
1-Unit, Detached	50.6%	57.7%
1-Unit, Attached	12.3%	7.0%
2 Units	1.6%	2.4%
3 or 4 Units	6.9%	5.5%
5 to 9 Units	6.7%	6.0%
10 to 19 Units	5.4%	5.2%
20 or More Units	13.7%	12.3%
Mobile Home	2.7%	3.7%
Boat, RV, Van, etc.	0.1%	0.1%
Source: American Community Survey, 5-Year Estimates, 2019.		

 Table 4-10 below displays housing stock by year built for Orange County and California. Older housing generally requires more upkeep, regular maintenance, and can cause a cost burden on both renters and homeowners. The data shows a greater percentage of homes built throughout California before 1960 compared to Orange County. The County experienced a large housing boom between 1960 and 2000 which resulted in the development of about 70 percent of the total housing stock. In comparison, 57 percent of the State's housing stock was built during those 40 years. Overall, increased numbers of older housing can lead to displacement, cost burden, and substandard living conditions.

Table 4-10
Number of Housing Units by Year Built

Year Built	Orange County	California
Built 2014 or later	2.7%	1.7%
Built 2010 to 2013	2.0%	1.7%
Built 2000 to 2009	8.3%	11.2%
Built 1990 to 1999	11.7%	10.9%
Built 1980 to 1989	14.9%	15.0%
Built 1970 to 1979	23.3%	17.6%
Built 1960 to 1969	19.5%	13.4%
Built 1950 to 1959	13.0%	13.4%
Built 1940 to 1949	2.1%	5.9%
Built 1939 or earlier	2.5%	9.1%
Source: American Community Survey, 5-Year Estimates, 2019.		

CHAPTER X – HOUSING ELEMENT

Future Growth Needs

Overview of the Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is a key tool for local governments to plan for anticipated growth. The RHNA quantifies the anticipated need for housing within each jurisdiction for the period from 2021 to 2029. Communities then determine how they will address this need through the process of updating the Housing Elements of their General Plans.

The current RHNA Allocation Plan was adopted by the Southern California Association of Governments (SCAG) in March 2021. The future need for housing is determined primarily by the forecasted growth in households in a community. Each new household, created by a child moving out of a parent's home, by a family moving to a community for employment, and so forth, creates the need for a housing unit. The housing need for new households is then adjusted to maintain a desirable level of vacancy to promote housing choice and mobility.

SCAG must take into consideration the following factors:

• Market demand for housing;

• Employment opportunities;

• Availability of suitable sites and public facilities;

• Commuting patterns;

• Type and tenure of housing;

• Loss of units in assisted housing developments;

• Over-concentration of lower income households; and

• Geological and topographical constraints.

An adjustment is also made to account for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. The sum of these factors – household growth, vacancy need, and replacement need – determines the construction need for a community. Total housing need is then distributed among four income categories on the basis of the county's income distribution, with adjustments to avoid an over-concentration of lower-income households in any community.

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*20**21**-2029 Growth Needs*

The total housing growth need for unincorporated Orange County during the 20~~12~~1-202~~0~~9 planning period is 10,406 units. This total is distributed by income category as shown in **Table 4-11.** Of the 3,139 very-low-income unit growth need, half (1570 units) are estimated to be needed for extremely-low-income households during the planning period, as provided by state law[8].

Table 4-11

**Regional Housing Growth Needs –
Unincorporated Orange County**

Very Low	Low	Moderate	Above Mod	Total
3,139	1,866	2,040	3,361	10,406
30.2%	17.9%	19.6%	32.3%	100%

Source: SCAG 2021

A discussion of the County's capacity to accommodate this growth need is provided in the land inventory section of Appendix B.

Preservation of Assisted Units at Risk of Conversion

State Housing Element Law requires the analysis of government-assisted housing units that are eligible to convert from low-income housing to market rate housing during the next 10 years due to expiring subsidies, mortgage prepayments, or expiration of affordability restrictions, and identification of programs aimed at their preservation.

Use restrictions, as defined by State law, means any federal, state or local statute, regulation, ordinance or contract which as a condition of receipt of any housing assistance, including a rental subsidy, mortgage subsidy, or mortgage insurance, to an assisted housing development, establishes maximum limitations on tenant income as a condition of eligibility for occupancy.

The following section analyzes the potential conversion of assisted housing units to market rate housing.

Inventory of At-Risk Units

The time frame for the analysis of assisted units is the ten-year period from 2021 to 2029. An inventory of at-risk units was compiled based on a review of the Inventory of Federally Subsidized Low-Income Rental Units At-Risk of

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[8] *Government Code* §65583.a.1

Conversion (California Housing Partnership Corporation), and information from OC Community Resources. At this time, there are no projects at risk of losing their use restrictions within the ten-year period.

SB 330

Effective January 1, 2020, Senate Bill 330 (SB 330) aims to increase residential unit development, protect existing housing inventory, and expedite permit processing. The revised definition of "Housing Development" now contains residential projects of two or more units, mixed-use projects (with two-thirds of the floor area designated for residential use), transitional, supportive, and emergency housing projects. SB330 sets a temporary 5-year prohibition of residential density reduction associated with a "housing development project", from January 1, 2020, to January 1, 2025. For example, during this temporary prohibition, a residential triplex cannot be demolished and replaced with a duplex as this would be a net loss of one unit.

The County is committed to making diligent efforts to engage underrepresented and disadvantaged communities in studying displacement.

Assessment of Contributing Factors to Fair Housing in Orange County

As identified by the AI and the above analysis, the County experiences the following local contributing factors to fair housing:

- There are five racially or ethnically concentrated census tracts (RECAPS) within Orange County as identified by HUD. These identified census tracts have at least 50 percent non-white populations with a poverty rate that exceeds 40 percent and/or is three or more times the average tract poverty rate for the metropolitan area.

- The UC Davis Regional Opportunity Index shows that the majority of residents within Orange County have moderate to high levels of access to opportunity, with some areas of low access. Additionally, analysis of the TCAC/HCD Opportunity Area Maps show that a large number of census tracts in northern Orange County have a "low resource" designation, meaning there is low access to essential resources for existing residents in those census tracts.

- The County has demonstrated the ability to meet the anticipated future affordable housing needs of the community through the designation of

sites to meet the very low- and low-income RHNA allocation (Appendix B). These sites are dispersed through the County's unincorporated areas.

- The County is committed to making diligent efforts to engage underrepresented and disadvantaged communities in studying displacement. The AI also identifies the following cross-jurisdictional fair housing goals to mitigate the existing fair housing issues in the community:

- Increase the supply of fair housing in high opportunity areas.

- Prevent displacement of low- and moderate-income residents with protected characteristics, including Hispanic residents, Vietnamese residents, seniors, and people with disabilities.

- Increase community integration for persons with disabilities.

- Ensure equal access to housing for persons with protected characteristics, who are disproportionately likely to be lower-income and to experience homelessness.

- Expand access to opportunity for protected classes.

Analysis of Sites Pursuant to AB 686

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification requirement involves not only an analysis of site capacity to accommodate the RHNA (provided in Appendix B), but also whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity.