Draft

16 Orange County Cities Regional Analysis of Impediments to Fair Housing Choice

City of Mission Viejo

March 9, 2016

City of Anaheim
City of Buena Park
City of Costa Mesa
City of Fountain Valley
City of Fullerton
City of Garden Grove
City of Huntington Beach
City of La Habra
City of Lake Forest
City of Mission Viejo
City of Newport Beach
City of Orange
City of Rancho Santa Margarita
City of San Clemente
City of Santa Ana
City of Tustin

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Executive Summary

The U.S. Department of Housing and Urban Development (HUD) requires entitlement jurisdictions -- HUD grant recipients -- to develop an Analysis of Impediments to Fair Housing Choice and evaluate its fair housing issues as an individual jurisdiction and within the context of a larger region. In Orange County, 16 entitlement cities have elected to prepare a regional Analysis of Impediments to Fair Housing Choice, referred to as the AI, to fulfill their HUD requirement and remove barriers to fair housing choice for all their residents.

A. What is the Analysis of Impediments

This Analysis of Impediments to Fair Housing Choice, which is referred to as the AI, examines policies, procedures, and practices within a community that may limit a person's ability to choose their residence free from discrimination. This AI provides an overview of laws, regulations, conditions or other possible obstacles that may affect an individual or a household's access to housing in a community. It also presents local and regional demographic profiles, assesses the extent of housing needs among specific groups, identifies existing barriers or impediments that may limit housing choice, and proposes actions to overcome those barriers.

Participating Cities

The 16 participating cities within Orange County that have collaborated in the preparation of this regional AI include:

- Anaheim
- Buena Park
- Costa Mesa
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach
- La Habra
- Lake Forest
- Mission Viejo
- Newport Beach
- Orange
- Rancho Santa Margarita
- San Clemente
- Santa Ana
- Tustin

Current AI Process

This AI is consistent with the current HUD requirements, and follows the guidelines according to HUD's *Fair Housing Planning Guide*. However, in July 2015, HUD announced the release of a final rule to Affirmatively Further Fair Housing (AFFH), which will replace the existing AI with a new Assessment of Fair Housing (AFH). The key differences between the current AI and the new AFH are

that HUD will provide data and an AFH Assessment Tool Template for conducting the fair housing analysis; grantees will be required to incorporate fair housing planning into their Consolidated Plans; and HUD will review assessments upfront as part of the planning process. The due date for the first AFH is 270 days prior to the program year that begins on or after January 1, 2017 (or January 1, 2018, depending on grantee type) for which a jurisdiction submits a new Consolidated Plan. Since the Orange County participating cities have recently submitted their Consolidated Plans for the 2015/16-2019/20 period, the AFH will not be required until 270 days before the start of the next five-year cycle in 2020/21.[1] Therefore, **this *Regional Analysis of Impediments to Fair Housing Choice for 16 Orange County Cities* is prepared under the current HUD AI requirements**.

B. Defining Fair Housing

Fair housing are rules that protect a person from being discriminated against during the sales, rental or leasing of housing. According to HUD's *Fair Housing Planning Guide,* and based within the legal framework of federal and state laws, impediments to fair housing choice are:

- Any actions, omissions or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation or any other arbitrary factor that restricts housing choices or the availability of housing choices, or
- Any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation or any other arbitrary factor.

In California, this also includes discrimination based on one's citizenship or immigration status. HUD also distinguishes between housing affordability and fair housing. Economic factors that affect a household's housing choices are not fair housing issues per se. Only when the relationship between household income, household type, race/ethnicity and other factors create misconceptions, biases and differential treatment would fair housing concerns arise.

C. Community Participation

In order to identify factors that could indicate impediments to fair housing choice, this AI incorporated a community outreach effort that included five community meetings, an on-line fair housing survey, and consultation with fair housing and other service providers.

Community Workshops

During the preparation of this AI, residents, businesses, and public and private agencies were invited to participate in the discussion of fair housing issues in Orange County. The five community workshops were conducted on the following dates and at five different locations:

[1] The City of San Clemente adopted a five year Consolidated Plan for the 2013/14-2017/18 period, and therefore its first AFH will be due by October 1, 2017.

- **September 22, 2015** — Assembly Hall, Downtown Anaheim Community Center, 250 E. Center, Anaheim, 6:00 p.m.
- **September 23, 2015** — Professional Training Center, Tustin Library, 345 E. Main Street, Tustin, 6:00 p.m.
- **September 24, 2015** – City Hall Council Chambers, 10200 Slater Avenue, Fountain Valley, 6:00 p.m.
- **September 30, 2015** – Santa Ana Police Community Room, 60 Civic Center Plaza, Santa Ana, 6:00 p.m.
- **October 1, 2015** – City Hall, Community Room, 25550 Commercentre Drive, Lake Forest, 6:00 p.m.

The meetings provided the opportunity for the community to gain awareness of fair housing laws, and for residents and service agencies to share fair housing issues and concerns. To ensure that the fair housing concerns of low- and moderate-income and special needs residents were addressed, individual invitation letters were distributed via mail and email, if available, to agencies and organizations that serve the low- and moderate-income and special needs community.

A notice of the Fair Housing Workshops was available in English, Spanish, and Vietnamese and published in the Orange County Register, La Opinión, and the Viet Bao Daily News. In addition, community workshop notices were posted on the various City websites. Copies of the Fair Housing Workshop notices and each City's outreach mailing list to housing agencies and organizations are included in Appendix A-1 of this AI. As a result of an extensive outreach effort, attendance at the public meetings included several service providers and citizen groups that work with residents considered a protected class according to HUD's definition.

A summary of key comments from the community workshops included:

- **Affordable Housing**: Increasing rents coupled with low vacancies have made it difficult to find affordable rental units. Some feel that landlords use the strong market to discriminate among potential renters.
- **Information on Housing Discrimination**: Many residents lacked information on tenant rights, such as when landlords asked for immigration documents. Residents did not know where to get help when they felt they had been discriminated against.
- **Mothers with Children**: A common complaint was the difficulty of families, especially mothers with children, in finding housing.
- **Overcrowding**: Problem was brought up by both residents and property managers.
- **Special Needs Housing**: Need for affordable rental housing units for seniors, persons with disabilities, and veterans.

Fair Housing Survey

To supplement the community meetings and to assist in further understanding fair housing issues in the region, a Fair Housing Survey was made available to Orange County residents at the City Halls of the 16-Cities and via each City's website. In addition, surveys were provided to service providers by request. The Fair Housing Survey was also available in Spanish, Vietnamese, and Korean. During the four-week survey period in September and October 2015, 188 surveys were completed online or in hardcopy by Orange County residents. Of the total, 59 percent were Spanish-speaking, 40 percent English-speaking, and one percent Vietnamese-speaking respondents. Samples of the Fair Housing surveys in the four languages are included as Appendix A-2 of this AI.

The survey consisted of questions designed to gather information on a person's experience with fair housing issues and perception of fair housing issues in their community. A summary of the key survey results included:

- Almost 60 percent of respondents completed the survey that was translated in Spanish.
- 57 percent of respondents have encountered housing discrimination, and of those, 88 percent felt landlord/property managers were responsible.
- 82 percent of the discrimination occurred in an apartment complex.
- One-half of those discriminated felt it was because of family status (families with children).
- Over 90 percent did not report the discrimination incident.
- 14 percent have been denied reasonable accommodation.
- Three-quarters of respondents felt they had little to no information on housing discrimination law, and one-third would not know what to do when discriminated.

Agency Consultation

A Working Group was formed with key staff representing each of the 16 cities participating in the development of this AI. The Working Group provided valuable information and insight into their community housing needs and fair housing issues. The first meeting of the Working Group was held in June 2015 and hosted by the City of Garden Grove. Monthly meeting were held in various participating cities to discuss the data needs, the community outreach effort, the AI approval process, the action plan recommendations, and the review of the AI. The monthly Working Group meeting agendas are included as Appendix B of this AI.

To supplement information gained through the workshops, numerous phone interviews were conducted with agencies such as the Fair Housing Foundation, the Fair Housing Council of Orange County, and the Orange County Housing Authority.

D. Summary of AI Findings and Conclusions

The following is a summary of the key findings from the AI:

- The number of fair housing cases opened by the Fair Housing Foundation and the Fair Housing Council of Orange County in the 16 participating cities total 85 over the last three years, with the leading bias based on disability (physical and mental), followed by familial status, national origin and race.
- The racial and ethnic distribution of Orange County's population appears diverse, with 56 percent of the total population comprised of Hispanics, Asians, African Americans, and other non-white groups. However, within the County there are areas of racial/ethnic concentrations, such as in Santa Ana where over three-quarters of the population is Hispanic and ten percent Asian. Approximately ten percent of households in the County are considered to be limited English-speaking households.
- Denial of reasonable modification or reasonable accommodation is a continuing impediment to fair housing choice.
- Incidents of discriminatory advertising that have potentially discouraged a certain type of renter or buyer have occurred.
- An average of 35 hate crimes are committed annually within the 16 participating cities. The highest number of hate crimes have occurred in the Cities of Huntington Beach, Santa Ana, Newport Beach and Garden Grove.
- Disparities exist in the home purchase loan denial rates experienced by Hispanic and Black/African American applicants within the 16 cities, with these groups evidencing loan denial at rates 1.5 to 1.6 times greater than White applicants. Cities with a large Hispanic population have a disproportionately smaller number of home purchase loans.
- Fourteen of the 16 Housing Elements are in compliance with state Housing Law. The City of Fullerton's Housing Element is out of compliance and the City of San Clemente's draft Housing Element was submitted for State review in early 2016.
- Zoning regulations related to second units, single-room occupancy housing (SRO), and transitional/supportive housing in a few cities should be amended to improve access to housing choice for all populations.
- Although all jurisdictions have adopted local density bonus ordinances, the recent addition of anti-displacement provisions under AB 222 and modified parking standards for transit-accessible projects under AB 744, will require updates to local density bonus ordinances.

E. Recommended Actions to Address Impediments

The following actions are recommended to address the impediments to fair housing choice in the 16-city Regional AI:

Regional Impediments Carried Over from 2010 Regional and Subregional AI

A-1. Housing Discrimination

Recommendations for All Jurisdictions:

- In partnership with each city's fair housing provider, conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach should include workshops, informational booths, presentations to civic leaders and community groups, staff trainings, and distribution of multi-lingual fair housing literature.
- Conduct focused outreach to small property owners/ landlords; conduct property manager trainings on a regular basis; promote fair housing certificate training.
- Provide general counseling and referrals to address tenant-landlord issues, and provide periodic tenant-landlord walk-in clinics at City Halls and other community locations.
- Include testing/audits within the scope of work for each city's fair housing provider. Support enforcement activity and publicize outcomes of fair housing litigation.

A-2. Racial and Ethnic Segregation

Recommendations for All Jurisdictions:

- Coordinate with fair housing providers to focus fair housing services, education/outreach, and/or additional testing in areas of racial/ethnic concentrations.
- Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities. Facilitate the provision of affordable housing throughout the community through: 1) available financial assistance; 2) flexible development standards; 3) density bonuses; and 4) other zoning tools.
- Promote equal access to information on the availability of affordable housing by providing information in multiple languages, and through methods that have proven successful in outreaching to the community, particularly those hard-to-reach groups.
- Affirmatively market first-time homebuyer and/or housing rehabilitation programs to low and moderate income areas, and areas of racial/ethnic concentration.
- Work collaboratively with local housing authorities to ensure affirmative fair marketing plans and de-concentration policies are implemented.

A-3. Denial of Reasonable Modifications/ Reasonable Accommodations

Recommendations for All Jurisdictions:

- Through each city's fair housing contractor, continue to provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.
- Provide information on the unlawful practice of denying reasonable modifications/ accommodations at fair housing seminars conducted by the Apartment Association of Orange County.

A-4. Discriminatory Advertising

Recommendations for All Jurisdictions:

- Through each city's fair housing contractor, periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements. When identified, make contact with the individual or firm and provide fair housing education.
- Take steps to encourage both the Los Angeles Times and Orange County Register to publish a Fair Housing Notice and a "no pets" disclaimer that indicates rental housing owners must provide reasonable accommodations, including "service animals" and "companion animals" for disabled persons.

A-5. Hate Crimes

Recommendations for All Jurisdictions:

- Continue to monitor FBI data to determine if any hate crimes are housing-related and if there are actions that may be taken by the City or its fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes.
- Continue to coordinate with various City and County housing, building and safety, health and sanitation, law enforcement and legal aid offices to maintain a comprehensive referral list of support services for victims of hate crimes or other violent crimes –inclusive of housing resources.

A-6. Unfair Lending

Recommendations for All Jurisdictions:

- As resources permit, monitor HMDA data annually using the 2013 HMDA analysis as a benchmark.
- As resources permit, monitor the top 10 lenders in Orange County to compare and contrast loan denial rates and percentage of loans completed to minority populations.

- Both of the Orange County fair housing service contractors should assist in identifying potential issues regarding redlining, predatory lending and other illegal lending activities. In addition, each city should review their agreements annually to make sure that increased and comprehensive services are being provided, and that education and outreach efforts are expanded and affirmatively marketed in low and moderate income and racial concentrated areas.
- Each city should explore ways to collaborate with local lenders and support lenders' efforts to work with community groups to help minority households purchase their homes. Collaborative efforts should ensure that minority groups have access and knowledge of City programs, supportive services, and provide for networking opportunities with these groups.
- Coordinate with local lenders to expand outreach efforts to first time homebuyers in minority neighborhoods.
- Affirmatively market first-time homebuyer and/or housing rehabilitation programs in neighborhoods with high denial rates, high minority population concentrations and limited English speaking proficiency to help increase loan approval rates.

Public Sector Impediments

B-1. Housing Element Compliance

Recommendations for Specific Jurisdictions:

- The Cities of Fullerton and San Clemente should pursue State certification of their Housing Elements.

B-2. Housing for Persons with Disabilities

Recommendations for Specific Jurisdictions:

- The City of San Clemente should adopt formal Reasonable Accommodations policy and procedure in 2016.
- The Cities of Anaheim, Tustin and La Habra should consider eliminating the processing fee for reasonable accommodation requests.
- The City of Newport Beach should consider amending its Reasonable Accommodation procedures to eliminate the requirement for a public hearing, and to approve administratively.

B-3. Zoning Regulations

Recommendations for Specific Jurisdictions:

- The City of Newport Beach should consider pursuing a Zoning Code amendment to eliminate the current age restriction on second units and establish a ministerial review process.

- The Cities of Buena Park, Orange and Santa Ana should amend their Zoning Codes to specify provisions for SRO units.
- The Cities of Fountain Valley and Orange should amend their Zoning Codes to regulate transitional and supportive housing as a residential use, subject to the same standards as other residential uses of the same type in the same zone.

B-4. Density Bonus Incentives

Recommendations for All Jurisdictions:

- All 16 jurisdictions should amend their Zoning Codes to reflect current State density bonus law.

1. Introduction

Equal access to housing is fundamental to each person in meeting essential needs and pursuing personal, educational, employment or other goals. In recognizing equal housing access as a fundamental right, the federal government and the State of California have both established fair housing choice as a right protected by law.

A. Purpose of the Analysis of Impediments to Fair Housing Choice

The purpose of an Analysis of Impediments to Fair Housing Choice is to examine policies, procedures, and practices within a community that may limit a person's ability to choice their residence free from discrimination. This AI provides an overview of laws, regulations, conditions or other possible obstacles or impediments that may affect an individual or a household's access to housing in a community. HUD defines impediments to fair housing choice as:

- Any actions, omissions or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation or any other arbitrary factor that restricts housing choices or the availability of housing choices; or
- Any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation or any other arbitrary factor.

Once the impediments to fair housing have been identified, the AI presents actions to overcome those barriers.

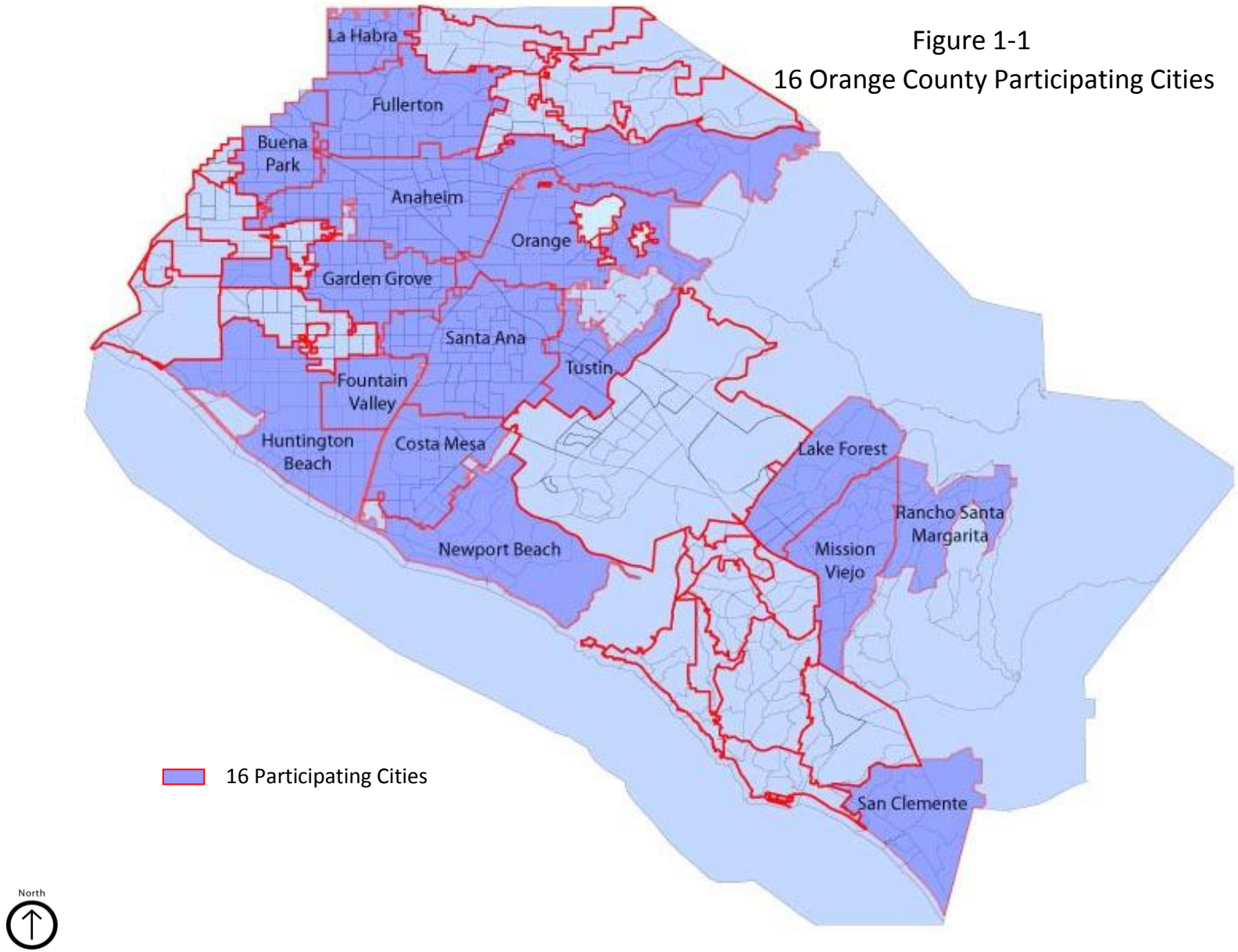
B. Lead Agencies and Geographic Area Covered

The following 16 Orange County entitlement cities have collaborated in the preparation of this regional AI:

- Anaheim
- Buena Park
- Costa Mesa
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach
- La Habra
- Lake Forest
- Mission Viejo
- Newport Beach
- Orange
- Rancho Santa Margarita
- San Clemente
- Santa Ana
- Tustin

The geographic area covered by this AI is shown in Figure 1-1.

Figure 1-1
16 Orange County Participating Cities



C. Fair Housing Legal Framework

Federal

The federal Fair Housing Act of 1968 and the Fair Housing Amendments Act of 1988 (42 U.S. Code §§ 3601-3619, 3631) are federal fair housing laws that prohibit discrimination in all aspects of housing, such as the sale, rental, lease or negotiation for real property. The Fair Housing Act prohibits discrimination based on race, color, religion, sex and national origin.

In 1988, the Fair Housing Act was amended to extend protections based on familial status and to persons with disabilities (mental or physical). The Amendments Act requires landlords to provide "reasonable accommodations" (exceptions) to their rules, policies and operations to allow tenants with disabilities equal access to housing. The Act also requires landlords to allow disabled tenants to make reasonable access-related modifications at their own expense.

In 2012, HUD published the Final Report on "Equal Access to Housing In HUD Programs Regardless of Sexual Orientation or Gender Identity." The new rule prohibits considering a person's marital status, sexual orientation, or gender identity in making homeless housing assistance available.

In July 2015, HUD announced the release of a final rule to Affirmatively Further Fair Housing (AFFH), which will replace the existing AI with a new Assessment of Fair Housing (AFH). The new AFH will incorporate data provided by HUD and use an AFH Assessment Tool Template for conducting the fair housing analysis. Grantees will incorporate fair housing planning into the Consolidated Plans and HUD will review assessments upfront as part of the planning process. The first AFH will be required of entitlement jurisdiction beginning 270 days prior to the program year that begins on or after January 1, 2017 (or January 1, 2018, depending on grantee type) for which a jurisdiction submits a new consolidated plan. As mentioned in the Executive Summary of this AI, as the 16 Orange County participating cities have recently submitted their Consolidated Plans for the 2015/16-2019/20 period, the AFH will not be required until 270 days before the start of the next five-year cycle in 2020/21.[1] Therefore, this AI for the 16 Orange County Cities is prepared under the current HUD AI requirements.

California

The California Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The Fair Employment and Housing Act (FEHA; Part 2.8 of the California Government Code, Code Sections 12900-12996) prohibit discrimination and harassment in housing practices.

[1] *The City of San Clemente adopted a five year Consolidated Plan for the 2013/14-2017/18 period, and therefore its first AFH will be due by October 1, 2017.*

The Unruh Act (California Government Code Section 51) protects Californians from discrimination in public accommodations and requires equal access to the accommodations. The Unruh Act provides broad protection and has been held by the courts to prohibit any arbitrary discrimination on the basis of personal characteristics or traits, and applies to a range of types of housing.

The Ralph Civil Rights Act (California Civil Code Section 51.7) prohibits violence and threats of violence and specifies that housing situations are protected under this Act, including houses, apartments, hotels, boarding housing and condominiums. Violators of the Ralph Act can be sued for actual or emotional damages, in addition to civil penalties.

The Bane Civil Rights Act (California Civil Code Section 52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual's constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes. However, convictions under the act are not allowed for speech alone unless that speech itself threatened violence.

In addition to these acts, California Government Code Sections 111135, 65008 and 65589.5 prohibit discrimination in programs funded by the state and in any land-use decisions. Government Code Section 65583, which governs preparation of the Housing Element, requires jurisdictions to include programs in their Elements to promote housing opportunities for all persons, regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability. The Housing Element must also address any zoning or land use laws or practices that either expressly discriminate against a group protected by the fair housing laws, or have the effect of discriminating against such a group.

D. Organization of the Regional AI

The Analysis of Impediments to Fair Housing Choice includes the Executive Summary, eight chapters and appendices.

Chapter 1: Introduction explains the purpose of this AI, defines fair housing and identifies the 16 participating cities that collaborated in the preparation of the AI.

Chapter 2: Community Participation describes the community outreach effort to receive input on the housing needs and fair housing issues faced by the community and housing service providers. This chapter also summarizes the input received from the five community meetings and responses from the fair housing survey.

Chapter 3: Community and Regional Profiles presents the demographic, socioeconomic, housing, employment characteristics and public services available to the residents of the 16 participating cities and Orange County.

Chapter 4: Mortgage Lending Practices analyzes lending activities and practices that could impede fair housing choices in the 16 participating cities.

Chapter 5: Public Policies and Practices evaluates various local public policies and actions that could impede fair housing choice.

Chapter 6: Fair Housing Profile evaluates the fair housing services available to residents and identifies fair housing complaints and violations in the 16 cities.

Chapter 7: Progress Since 2010 summarizes the private and public sector impediments identified in the prior AI and the region's progress in implementing actions to address these impediments.

Chapter 8: Fair Housing Plan provide conclusions about fair housing issues and recommends actions to address impediments in the 16 cities.

At the end of this report, a page is attached that includes the endorsement of the City Managers and a statement certifying that the AI represents each cities' official conclusions regarding impediments to fair housing choice and the actions necessary to address these impediments.

E. Data Sources

The following data sources were used to complete this AI. Sources of specific information are identified in the text, tables and figures.

- U.S Census Bureau, 2000 and 2010 Census
- U.S. Census Bureau, American Community Survey (ACS), 2009-2013 Five-Year Estimates
- U.S. Department of Housing and Urban Development (HUD) website
- U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy 2012 (CHAS)
- Federal Bureau of Investigation (FBI) Uniform Crime Reporting Program
- California Department of Finance (DOF), 2015 Estimates
- California Department of Social Services (DSS), Community Care Licensing Division
- Orange County Transportation Authority (OCTA) website
- Orange County Community Services, Orange County Homeless Count and Survey Report, 2015
- Orange County Housing Authority (OCHA) Section 8 Program information, 2015
- Anaheim Housing Authority (AHA) Section Program information, 2015
- Garden Grove Housing Authority (GGHA) Section 8 Program information, 2015
- Santa Ana Housing Authority (SAHA) Section 8 Program information, 2015
- Fair Housing Council of Orange Quarterly Reports, 2012/13 - 2014/15
- Fair Housing Foundation Annual Reports, 2012/13 - 2014/15
- Housing Mortgage Disclosure Act (HMDA) data on lending patterns, 2011-2013

- Documents from the 16 participating cities:
  - General Plan
  - 2014-2021 Housing Elements
  - Zoning Ordinances
  - Consolidated Annual Performance and Evaluation Report (CAPERS)
  - 2015-2020 Consolidation Plan

2. Community Participation

In order to identify factors that could indicate impediments to fair housing choice, this AI incorporated a community outreach effort that included five community meetings, an on-line fair housing survey, coordination with fair housing service and housing providers

A. Community Workshops

During the preparation of this AI, residents, businesses, and public and private agencies were invited to participate in the discussion of fair housing issues in Orange County. Five community workshops were conducted in late September and early October 2015 at five different locations. The five locations were selected to enable residents easier access to the workshops. The community workshops were held on the following dates:

- **September 22, 2015** — Assembly Hall, Downtown Anaheim Community Center, 250 E. Center, Anaheim, 6:00 p.m.
- **September 23, 2015** — Professional Training Center, Tustin Library, 345 E. Main Street, Tustin, 6:00 p.m.
- **September 24, 2015** — City Hall Council Chambers, 10200 Slater Avenue, Fountain Valley, 6:00 p.m.
- **September 30, 2015** — Santa Ana Police Community Room, 60 Civic Center Plaza, Santa Ana, 6:00 p.m.
- **October 1, 2015** — City Hall, Community Room, 25550 Commercentre Drive, Lake Forest, 6:00 p.m.

The meetings provided the opportunity for the community to gain awareness of fair housing laws, and for residents and service agencies to share fair housing issues and concerns. To ensure that the fair housing concerns of low- and moderate-income and special needs residents were addressed, individual invitation letters were distributed via mail and email, if available, to agencies and organizations that serve the low- and moderate-income and special needs community.

Notices of the Fair Housing Workshops were available in English, Spanish, and Vietnamese. The workshop notices were published in the Orange County Register, La Opinión (Spanish) and the Viet Bao Daily News (Vietnamese) weeks prior to the meetings. Thanks to the participating Cities' efforts to publicize the workshops through posts on their websites, mailings to local service providers, and communications with local stakeholders and public officials, a total of 54 individual participated in the five workshops. In addition, as a result of the extensive outreach effort, the workshops were attended by several service providers that work with residents considered a protected class according to HUD's definition. The Fair Housing Workshop notices (English, Spanish and

Vietnamese), workshop sign-in sheet, presentation material, city mailing lists, and a summary of workshop attendee comments are included as Appendix A-1 of this AI.

Summary of key comments from the community workshops included:

- **Affordable Housing**: Increasing rents coupled with low vacancies have made it difficult to find affordable rental units. Some have indicated that landlords use the strong market to discriminate among potential renters.
- **Information on Affordable Housing Discrimination**: Many residents lacked information on tenant rights, such as when landlords asked for immigration documents. Residents did not know where to get help when discriminated.
- **Mothers with Children**: A common complaint was the difficulty of families, especially mothers with children, in finding housing.
- **Overcrowding**: The problem of overcrowding was brought up by both residents and property managers.
- **Special Needs Housing**: There is a need for affordable rental housing units for seniors, persons with disabilities, and veterans.

B. Fair Housing Survey

To supplement the community meetings and to assist in further understanding the fair housing issues in the region, a Fair Housing Survey was made available to residents at the 16 city halls and online via the City's website. The surveys, both hardcopy and on-line, were available in English, Spanish, Vietnamese, and Korean to reflect the diversity of Orange County residents.

The survey consisted of questions designed to gather information on a person's experience with fair housing issues and perception of fair housing issues in his/her neighborhood. During the four-week survey period in September and October 2015, 188 surveys were completed online and on hardcopies. Of the total, 59 percent were Spanish-speaking, 40 percent English-speaking, and one percent Vietnamese-speaking respondents. A summary of the key questions and responses were the following:

The survey consisted of questions designed to gather information on a person's experience with fair housing issues and perception of fair housing issues in their community. A summary of the key survey results included:

- Almost 60 percent of respondents completed the survey that was translated in Spanish.
- 57 percent of respondents have encountered housing discrimination, and of those, 88 percent indicated that landlord/property managers were responsible.
- 82 percent of the discrimination occurred in an apartment complex.
- One-half of those discriminated responded that it was because of family status (families with children).

- Over 90 percent did not report the discrimination incident.
- 14 percent have been denied reasonable accommodation.
- Three-quarters of respondents indicated they had little to no information on housing discrimination law, and one-third would not know what to do when discriminated.

Copies of the survey in four languages and a summary of the results are included in Appendix A-2

C. Public Review

During a 30-day public review period from March 9 to April 7, 2016, the draft AI document was made available at the following locations:

- City Halls of 16-participating Cities
- City websites

Notice of public review was published in the Orange County Register, La Opinion, and Viet Bao Daily News on March 8, 2016. In addition, all persons that attended the community workshops were emailed or faxed the location of the public review document on the City's website and asked to provide any further comments for incorporation into the final AI.

During the 30-day public review period, ____ written comments were received on the AI. Copies of the written comments are included in Appendix A-3.

3. Community and Regional Profiles

Chapter 3 provides analysis of the demographic, socioeconomic and housing characteristics of the 16 Orange County cities participating in this regional Analysis of Impediments to Fair Housing Choices. chapter presents a demographic profile, assesses the extent of housing needs among specific income groups and evaluates the availability of a range of housing choices for residents. Major employers and transportation access to job centers are identified, and community social services offered by licensed care facilities are discussed. Data-based analysis of demographic, economic, and housing conditions within a city or other jurisdiction is integral for evaluating housing demands and potential fair housing issues for the studied area.

Key data sources for Chapter 3 include: U.S. Census Bureau (Census), American Community Survey (ACS), HUD Comprehensive Housing Affordability Strategy (CHAS) Data, California Department of Finance (DOF), California Department of Social Services Community Care Licensing Division, and the California Employment Development Department (EDD).

A. Demographic Profile

Population Growth

In 2015, the population of the 16 cities participating in this regional AI totals approximately 2.1 million, which represents two-thirds of the total number of residents in Orange County. Table 3-1 details the number and growth rate of the residential populations of the 16 cities, Orange County, and California between 2000 and 2015. In general, there was consistent positive growth on the city, county, and state levels during both the 2000–2010 and 2010–2015 time periods. The sole exception is the City of Santa Ana, which experienced a decrease in population by four percent between 2000 and 2010. During the last five years, the City of Tustin experienced the highest percentage increase in population growth at 5.4 percent, larger than both the County rate of 4.6 percent and the State rate of 3.9 percent. However, over the 15-year period, the City of Lake Forest had the largest percentage increase in population, with an increase of 36.4 percent growth[1]. The next fastest growing cities for this 15-year period were San Clemente (31.0%), Newport Beach (24.6%), Tustin (17.9%), and Fullerton (11.9%). No other cities experienced population growth in excess of ten percent. In comparison, the population of Orange County increased by 10.6 percent while California grew by 14.3 percent between 2000 and 2015. Although the City of Santa Ana rebounded over the last five years with a population increase of 3.3 percent, the overall 15-year growth was still a negative 0.8 percent. Other low-growth cities included Fountain Valley (3.7%), Mission Viejo (3.8%), Rancho Santa Margarita (4.0%), Costa Mesa (4.4%), and Huntington Beach (4.6%).

[1] *The large population growth in Lake Forest is attributed to annexation that occurred in late 2000.*

Table 3-1: Population Growth 2000-2015

City/Area	2000	2010	2015	% Change 2000 to 2010	% Change 2010 to 2015
Anaheim	328,014	336,265	351,433	2.5%	4.5%
Buena Park	78,282	80,530	82,767	2.9%	2.8%
Costa Mesa	108,724	109,960	113,455	1.1%	3.2%
Fountain Valley	54,978	55,313	57,021	0.6%	3.1%
Fullerton	126,003	135,161	141,042	7.3%	4.4%
Garden Grove	165,196	170,883	174,774	3.4%	2.3%
Huntington Beach	189,594	189,992	198,389	0.2%	4.4%
La Habra	58,974	60,239	62,079	2.1%	3.1%
Lake Forest	58,707	77,264	80,070	31.6%*	3.6%
Mission Viejo	93,102	93,305	96,652	0.2%	3.6%
Newport Beach	70,032	85,186	87,249	21.6%	2.4%
Orange	128,868	136,416	140,094	5.9%	2.7%
Rancho Santa Margarita	47,214	47,853	49,125	1.4%	2.7%
San Clemente	49,936	63,522	65,399	27.2%	3.0%
Santa Ana	337,977	324,528	335,264	-4.0%	3.3%
Tustin	67,504	75,540	79,601	11.9%	5.4%
Orange County	2,846,289	3,010,232	3,147,655	5.8%	4.6%
California	33,873,086	37,253,956	38,714,725	10.0%	3.9%

Sources: U.S. Census 2000 and 2010; CA Dept of Finance E-5 Est., January 2015

**Growth attributed to the annexation of Foothill Ranch and Portola, which occurred in late 2000.*

Age Composition

Analyzing the age distribution is important because it affects the future need for jobs, housing and other social services. For cities that have a majority share of the population under the age of 35 years, future growth planning may need to include additional schools, entry-level jobs, and starter homes. This age group typically consists of young children, students, recent graduates, or adults just entering the job market. This indicates that the provision of smaller, affordable housing opportunities, particularly in the rental market, is needed in the near future to allow this group to remain in the community. Residents ages 35 to 64 years tend to drive the market demand for moderate to relatively high cost condominiums and single-family homes. People over 65 years of age tend to generate demand for low to moderate cost apartments and condominiums, group quarters, and mobile homes; senior residents may also balance their housing options with the proximity to social services.

Table 3-2 details the age distribution in 2013 of the residential populations of the 16 cities, Orange County, and the State. The age groups are designated as follows: Under 5 years (young children), 5-17 years (minors), 18-34 (young adults), 35-54 (middle-age adults), 55-64 (future elderly), 65-74 (elderly), and 75 years and older (frail elderly). These divisions are intended to give an overview of the percent of populations at different age ranges which tend to have similar needs in terms of housing and social services. In general, the 35-54 years of age group represented the largest share of the population. The exceptions were the cities of Costa Mesa, Fullerton, La Habra, and Santa Ana, where the 18-34 age group was the largest proportion. Figure 3-1 illustrates the 2013 age distribution by the 16 cities.

Table 3-2: Age Distribution of Population 2013

City/Area	Under 5	5-17	18-34	35-54	55-64	65-74	75+
Anaheim	7.7%	19.4%	26.0%	27.4%	9.6%	5.4%	4.4%
Buena Park	6.3%	18.2%	24.5%	29.0%	10.5%	6.2%	5.3%
Costa Mesa	6.5%	14.5%	30.8%	29.6%	9.7%	4.7%	4.1%
Fountain Valley	4.3%	15.2%	19.8%	29.0%	13.5%	10.4%	7.8%
Fullerton	6.4%	16.9%	27.5%	27.4%	9.8%	6.0%	6.0%
Garden Grove	6.1%	18.9%	24.1%	29.1%	10.5%	6.2%	5.2%
Huntington Beach	5.0%	15.0%	22.5%	30.1%	12.4%	8.4%	6.4%
La Habra	7.5%	18.5%	27.0%	26.7%	10.1%	4.7%	5.4%
Lake Forest	5.9%	18.0%	21.1%	32.7%	12.3%	6.2%	3.9%
Mission Viejo	5.1%	17.2%	18.2%	30.3%	14.1%	8.2%	6.9%
Newport Beach	3.9%	13.4%	21.6%	27.4%	14.3%	10.6%	8.7%
Orange	6.5%	15.9%	26.7%	29.5%	10.2%	6.3%	4.8%
Rancho Santa Margarita	6.0%	22.2%	21.5%	34.1%	9.8%	3.8%	2.5%
San Clemente	6.6%	18.7%	17.1%	30.6%	13.1%	8.1%	5.8%
Santa Ana	8.7%	21.5%	28.7%	27.0%	7.3%	4.0%	2.9%
Tustin	7.5%	19.1%	26.3%	29.8%	9.1%	4.7%	3.5%
Orange County	6.3%	17.7%	24.0%	28.9%	11.0%	6.5%	5.5%
California	6.7%	17.8%	24.9%	27.7%	11.1%	6.4%	5.4%

Source: ACS 2009-2013 5-Yr Est. Tables DP05 and S0101

Figure 3-1: Age Distribution 2013

Source: ACS 2009-2013 5 Yr Est. Tables DP05 and S0101

Table 3-3 contains summary age indicators for the 16 cities, Orange County, and California. In each jurisdiction, the median age of the residential population has increased between 2000 and 2013, indicating a general trend towards a "greying" of the population. The highest median age in 2013 was seen in Newport Beach (43.7), followed by Fountain Valley (43.4), Mission Viejo (43.0), Huntington Beach (40.6), and San Clemente (40.1). The lowest median age in 2013 was Santa Ana's 29.2 years, followed by Anaheim (32.8), La Habra (33.2), Tustin (33.3), and Costa Mesa (33.8). In comparison, the median age in 2013 was 36.4 years for Orange County, and 35.4 years statewide.

Table 3-3: Age Characteristics 2013

City/Area	Median Age		Depend. Ratio	Old-age Depend. Ratio	Child Depend. Ratio	Pop. Under 18 Yrs	Pop. 65+ Yrs
	2000	2013					
Anaheim	30.3	32.8	58.4	15.6	42.9	27.1%	9.8%
Buena Park	32.0	35.5	56.4	18.0	38.4	24.5%	11.5%
Costa Mesa	32.0	33.8	42.5	12.5	30.1	21.0%	8.8%
Fountain Valley	38.1	43.4	60.4	29.2	31.2	19.5%	18.2%
Fullerton	32.9	34.4	54.6	18.6	36.0	23.3%	12.0%
Garden Grove	32.3	35.6	57.2	17.9	39.3	25.0%	11.4%
Huntington Beach	36.0	40.6	53.6	22.8	30.7	20.0%	14.8%
La Habra	31.5	33.2	56.6	15.9	40.7	26.0%	10.1%
Lake Forest*	35.1	38.4	52.8*	15.1*	37.7*	23.9%	10.1%
Mission Viejo	37.5	43.0	59.5	24.0	35.5	22.3%	15.1%
Newport Beach	41.6	43.7	57.7	30.4	27.3	17.3%	19.3%
Orange	33.2	35.4	50.7	16.8	33.9	22.4%	11.1%
Rancho Santa Margarita	31.9	35.2	52.6	9.7	42.9	28.2%	6.3%
San Clemente	38.0	40.1	64.4	22.9	41.6	25.3%	13.9%
Santa Ana	26.5	29.2	58.8	10.8	48.0	30.2%	6.9%
Tustin	31.8	33.3	53.4	12.6	40.9	26.6%	8.2%
Orange County	33.3	36.4	56.4	18.8	37.6	24.0%	12.0%
California	33.3	35.4	57.1	18.6	38.6	24.5%	11.8%

Source: ACS 2009-2013 5-Yr Est. Tables DP05 and S0101

** 2012 value from ACS 2008-2012 Table S0101*

The dependency ratio, which is the ratio of the population under 18 and over 65 years of age to the population 18 to 64, is an indicator of the reliance of children and senior citizens on the working age population. The range of the dependency ratio is measured from 0 (low) to 100 (high); the lower the dependency ratio, the lesser the "burden" is on a community's working age residents. The dependency ratio is an important indication of the demand for social services and senior housing. According to Table 3-3, the dependency ratio in 2013 was 56.4 in Orange County, and 57.1 in California. Cities with notably higher dependency ratios included San Clemente (64.4), Fountain Valley (60.4), and Mission Viejo (59.5).

In addition to the composite age dependency ratio, Table 3-3 includes the proportion of minor-age dependency versus elderly dependency, as well as the percentages of the total populations that are under 18 years and 65 years or older, respectively. The old age dependency ratio and the child

dependency ratio can inform with greater detail the types of services and housing options needed in a particular jurisdiction. For example, the dependency ratios of Santa Ana (58.8) and Newport Beach (57.7) indicate similar degrees of the social burden on working age residents. However, Newport Beach has an old-age dependency ratio of 30.4 and a child dependency ratio of 27.3, indicating a great demand for senior housing and social service targeted for the elderly. With an old age dependency ratio of 10.8 and a child dependency ratio of 48.0 in Santa Ana indicates the types of housing and social services needed would skew more towards childcare and other youth-targeted amenities, with relatively less demand for senior services.

Age and fair housing intersect when managers or property owners make housing decisions based on the age of residents or the familial status (families with children). For example, managers and property owners may prefer to rent to mature residents, limit the number of children in their complex or discourage older residents due to their disabilities. Although a housing provider may establish reasonable occupancy limits and set reasonable rules about the behavior of tenants, those rules cannot single out children for restrictions that do not also apply to adults.

Race and Ethnicity

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

Table 3-4 presents the racial and ethnic characteristics of the 16 cities and Orange County residents. It shows that the County experienced major shifts in racial and ethnic composition since 2000. In 2000, over one-half of the countywide population was non-Hispanic White, but by 2013 the proportion of the non-Hispanic White population decreased to 43.5 percent. During the same period, the Hispanic population increase from 30.8 percent to 33.8 percent. The largest shift occurred in the non-Hispanic Asian/Pacific Islander group, which accounted for 13.8 percent of the total County population in 2000 and increased to 18.5 percent in 2013.

Table 3-4 and Figure 3-1 show the racial/ethnic composition by the 16 cities. The City of Santa Ana had the highest proportion of Hispanic residents in the County at 78.5 percent in 2013. Other cities with high representation of Hispanic residents included La Habra (60.3%), Anaheim (52.6%), Buena Park (38.5%), and Orange (38.4%). The other key minority group was non-Hispanic Asian/Pacific Islander residents. The city with the highest proportion of non-Hispanic Asian residents was the City of Garden Grove (38.8%). This was followed by the Cities of Fountain Valley (33.8%), and Buena Park (28.7%). The city that experienced the largest percent change of the minority population between 2000 and 2013 was Newport Beach. Although the number of Hispanic and non-Hispanic Asian residents in the city was relatively small (7,189 Hispanic and 6,008 non-Hispanic Asian), these two racial/ethnic groups in Newport Beach more than doubled in size during the 13-year period.

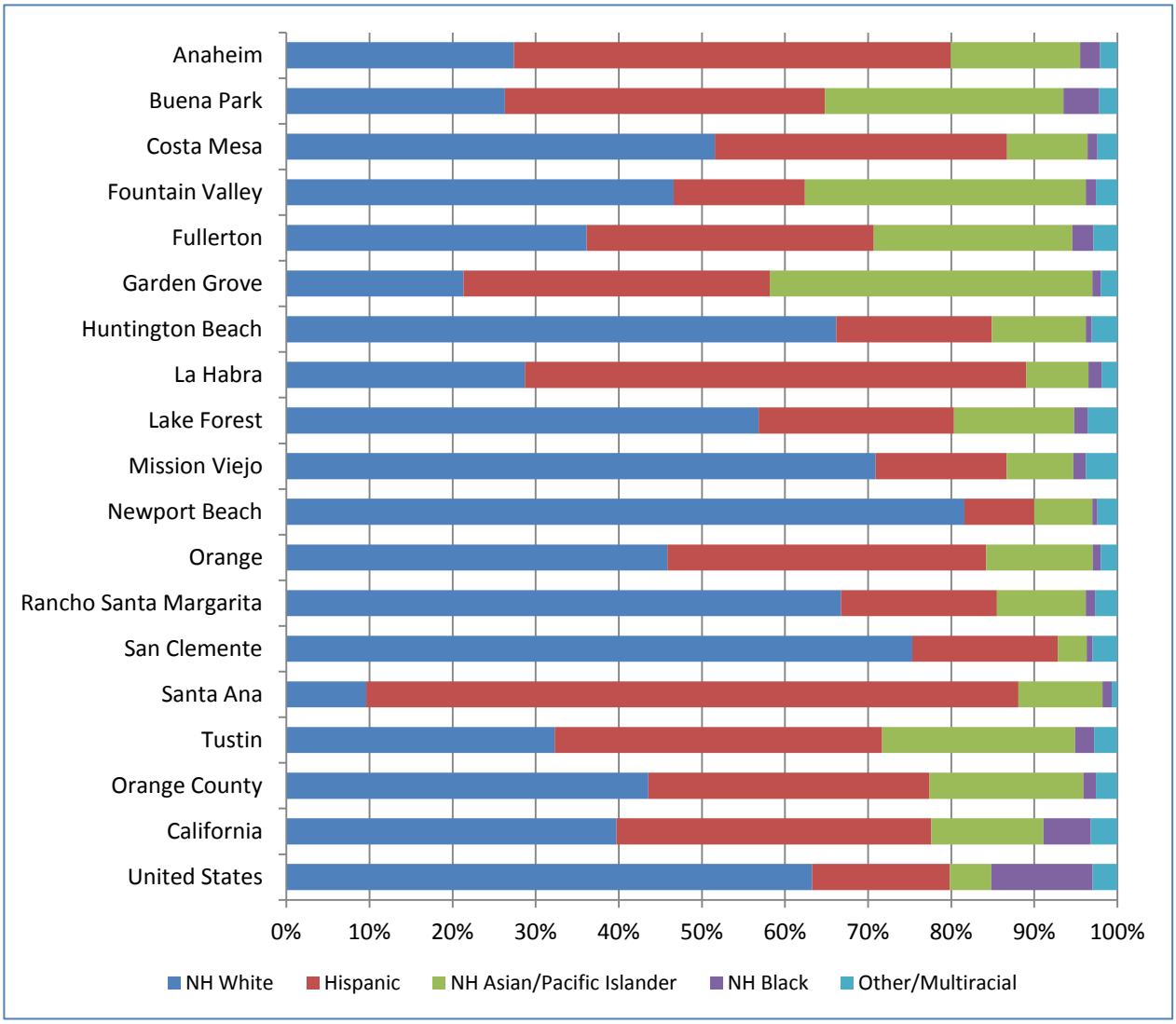
Table 3-4: Racial and Ethnic Composition of Population 2000 and 2013

City/Area	Year	% Hispanic	% NH White	% NH Black	% NH Asian/ Pac. Islander	% Other/ Multiracial
Anaheim	2000	46.8%	35.9%	2.4%	12.3%	2.8%
	2013	52.6%	27.4%	2.4%	15.6%	2.1%
Buena Park	2000	33.5%	38.2%	3.6%	21.3%	3.4%
	2013	38.5%	26.3%	4.3%	28.7%	2.2%
Costa Mesa	2000	31.8%	56.8%	1.2%	7.4%	2.8%
	2013	35.2%	51.6%	1.2%	9.7%	2.4%
Fountain Valley	2000	10.7%	58.5%	1.1%	26.2%	4.1%
	2013	15.8%	46.6%	1.2%	33.8%	2.6%
Fullerton	2000	30.2%	48.7%	2.1%	16.2%	2.8%
	2013	34.5%	36.1%	2.5%	23.9%	2.9%
Garden Grove	2000	32.5%	32.5%	1.1%	31.4%	2.5%
	2013	36.8%	21.3%	1.0%	38.8%	2.0%
Huntington Beach	2000	14.7%	71.9%	0.7%	9.5%	3.3%
	2013	18.7%	66.1%	0.7%	11.3%	3.1%
La Habra	2000	49.0%	41.4%	1.4%	6.0%	2.3%
	2013	60.3%	28.7%	1.6%	7.5%	1.9%
Lake Forest	2000	18.6%	66.7%	1.7%	9.8%	3.2%
	2013	23.5%	56.9%	1.6%	14.5%	3.6%
Mission Viejo	2000	12.1%	76.0%	1.1%	7.8%	3.1%
	2013	15.8%	70.9%	1.5%	8.0%	3.8%
Newport Beach	2000	4.7%	89.0%	0.5%	4.1%	1.7%
	2013	8.4%	81.6%	0.6%	7.0%	2.4%
Orange	2000	32.2%	54.6%	1.4%	9.4%	2.4%
	2013	38.4%	45.9%	1.0%	12.8%	2.0%
Rancho Santa Margarita	2000	13.0%	74.4%	1.7%	7.5%	3.5%
	2013	18.8%	66.8%	1.1%	10.7%	2.7%
San Clemente	2000	15.9%	78.4%	0.6%	2.7%	2.4%
	2013	17.5%	75.4%	0.7%	3.5%	3.0%
Santa Ana	2000	76.1%	12.4%	1.3%	9.0%	1.2%
	2013	78.5%	9.6%	1.1%	10.1%	0.7%
Tustin	2000	34.2%	44.8%	2.6%	15.1%	3.2%
	2013	39.4%	32.3%	2.3%	23.2%	2.8%
Orange County	2000	30.8%	51.3%	1.5%	13.8%	3.1%
	2013	33.8%	43.5%	1.5%	18.5%	2.6%

Source: Census 2000 SF1 Table P004, ACS 2009-2013 5Yr Est. Table DP05
NH: Non-Hispanic

Other cities with a significant change in the Hispanic population between 2000 and 2013 included the Cities of Lake Forest (68.2%) Fountain Valley (50.3%), and Rancho Santa Margarita (48.1%). For the non-Hispanic Asian population, the Cities of Lake Forest (96.7%), Tustin (74.4%), and San Clemente (66.1%) also experienced large percentage changes between 2000 and 2013.

Figure 3-2: Population by Race/Ethnicity 2013



Source: ACS 2009-2013 5 Yr Est. Table DP05

Table 3-5: Growth in Racial/Ethnic Group Populations 2000-2013

City/Area	Hispanic			NH White			NH Black			NH Asian/Pacific Islander			Other Race/Multiracial		
	2000	2013	% Change	2000	2013	% Change	2000	2013	% Change	2000	2013	% Change	2000	2013	% Change
Anaheim	153,374	178,723	16.5%	117,607	93,099	-20.8%	7,939	8,174	3.0%	40,182	53,204	32.4%	8,912	6,881	-22.8%
Buena Park	26,221	31,406	19.8%	29,885	21,417	-28.3%	2,826	3,481	23.2%	16,696	23,396	40.1%	2,654	1,822	-31.3%
Costa Mesa	34,523	39,018	13.0%	61,778	57,223	-7.4%	1,313	1,278	-2.7%	8,022	10,731	33.8%	3,088	2,621	-15.1%
Fountain Valley	5,870	8,823	50.3%	32,144	26,031	-19.0%	584	669	14.6%	14,302	18,891	32.1%	2,249	1,497	-33.4%
Fullerton	38,014	47,230	24.2%	61,420	49,371	-19.6%	2,675	3,476	29.9%	20,381	32,657	60.2%	3,513	3,968	13.0%
Garden Grove	53,608	63,617	18.7%	53,735	36,826	-31.5%	1,873	1,803	-3.7%	51,798	67,121	29.6%	4,182	3,418	-18.3%
Huntington Beach	27,798	36,204	30.2%	136,237	127,779	-6.2%	1,383	1,332	-3.7%	17,976	21,850	21.6%	6,200	6,032	-2.7%
La Habra	28,922	36,748	27.1%	24,399	17,507	-28.2%	808	949	17.5%	3,432	4,537	32.2%	1,324	1,157	-12.6%
Lake Forest	10,913	18,351	68.2%	39,161	44,521	13.7%	998	1,236	23.8%	5,760	11,330	96.7%	1,875	2,815	50.1%
Mission Viejo	11,266	14,856	31.9%	70,735	66,870	-5.5%	1,032	1,412	36.8%	7,244	7,588	4.7%	2,825	3,585	26.9%
Newport Beach	3,301	7,189	117.8%	62,342	70,174	12.6%	354	541	52.8%	2,844	6,008	111.3%	1,191	2,089	75.4%
Orange	41,434	52,967	27.8%	70,292	63,298	-9.9%	1,798	1,353	-24.7%	12,166	17,613	44.8%	3,131	2,768	-11.6%
Rancho Santa Margarita	6,139	9,094	48.1%	35,132	32,281	-8.1%	787	519	-34.1%	3,530	5,166	46.3%	1,626	1,295	-20.4%
San Clemente	7,933	11,174	40.9%	39,155	48,232	23.2%	320	448	40.0%	1,355	2,250	66.1%	1,173	1,890	61.1%
Santa Ana	257,097	257,998	0.4%	41,984	31,466	-25.1%	4,309	3,750	-13.0%	30,405	33,047	8.7%	4,182	2,458	-41.2%
Tustin	23,110	30,139	30.4%	30,264	24,690	-18.4%	1,785	1,739	-2.6%	10,194	17,775	74.4%	2,151	2,154	0.1%

Source: Census 2000 SF1 Table P004, ACS 2009-2013 5Yr Est. Table DP05

Residential Segregation

The racial and ethnic distribution of Orange County's population appears diverse with 56 percent of the total population composed of Hispanic, non-Hispanic Asian, non-Hispanic Black/African American, and other. However, within the County there are areas of racial/ethnic concentrations. For example, the City of Santa Ana's population is over three-quarters Hispanic and ten percent non-Hispanic Asian. Areas of racial/ethnic minority concentration are neighborhoods with a disproportionately high number of minority (non-White) residents.

To illustrate areas of minority "concentration" on a geographic level, census tracts that exceed the countywide average of minorities, measured at 56 percent in 2013 was mapped. Figure 3-3 displays the Orange County census tracts with the minority population representing more than 56 percent of the total population of the census tract. As the map illustrates, concentrations of minorities are most prevalent in central and northern Orange County in cities such as Santa Ana, Garden Grove, Anaheim, and Buena Park.

Linguistic Isolation

Table 3-6 details the percent of total households in 2013 that were considered to be limited English-speaking households. The Census defines a limited speaking household as a household "in which no member 14 years old and over: 1) speaks only English; or 2) speaks a non-English language and speaks English 'very well.'" In other words, all household members 14 and older have at least some difficulty with English proficiency. According to Table 3-6, 9.6 percent of Orange County households and 9.9 percent of California households fall under this definition. The Cities with larger percentages than the County and State were Santa Ana (23.1%), Garden Grove (18.5%), Buena Park (17.8%), Anaheim (14.2%), La Habra (11.8%), and Tustin (10.1%). The table also lists the prevalence of limited English proficiency among households whose primary spoken language is not English. For example, among all Buena Park households whose primary spoken language is Spanish, 29.2 percent were considered to be limited English-speaking households. In general, households speaking Asian/Pacific Islander languages display the largest degree of linguistic isolation. As presented in the table, 40.5 percent of Santa Ana's households whose primary language was Asian/Pacific Islander had limited English-speaking proficiency. Other cities that exhibited similar linguistic isolation among Asian/Pacific Islander-speaking households included Garden Grove (38.1%), and Buena Park (35.2%).

Language barriers can serve as an impediment to fair housing accessibility. Residents who lack proficiency with the English language may have difficulties accessing services and information pertaining to fair housing, or may be obstructed by reluctance on the part of landlords to rent units to non-English speaking tenants. Another fair housing concern could arise if foreign-born owners of rental housing advertise only in their native languages, thus restricting choice in the renter market. Limited English proficiency may also hinder access to social services, or affect a resident's employment opportunities and educational attainment.

Figure 3-3
Concentration of Minority Population
By Census Tracts 2013

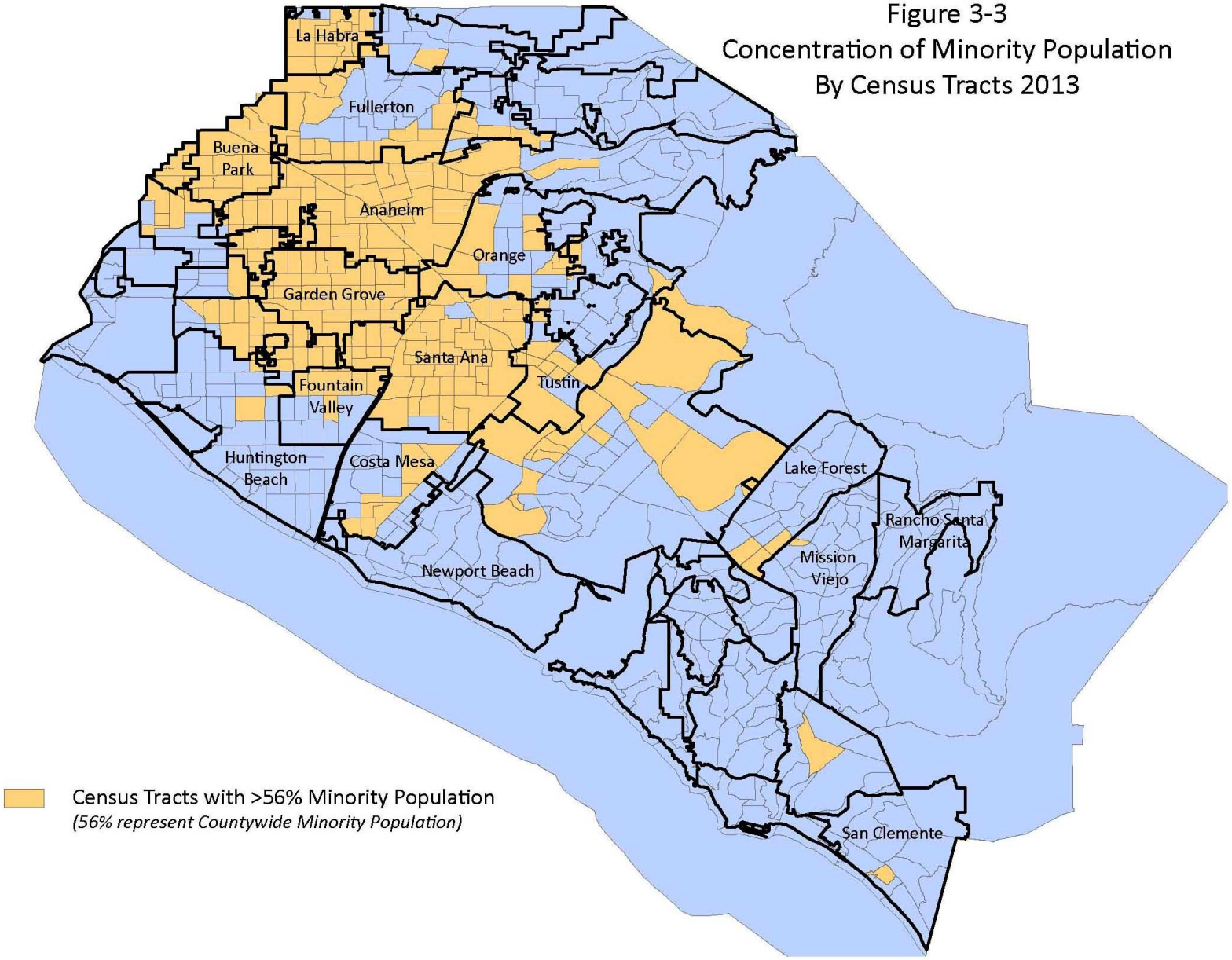


Table 3-6: Limited English Speaking Households 2013

Cities	Limited English Speaking as % of Total HHs	% of HH by Primary Language			
		Spanish	Other Indo-European Language	Asian/ Pac. Island Language	Other Language
Anaheim	14.2%	22.9%	17.5%	30.9%	26.0%
Buena Park	17.8%	29.2%	14.2%	35.2%	33.9%
Costa Mesa	5.8%	19.2%	7.3%	17.1%	2.9%
Fountain Valley	8.4%	9.9%	11.4%	26.1%	13.2%
Fullerton	9.6%	14.9%	11.5%	29.6%	11.7%
Garden Grove	18.5%	16.7%	11.5%	38.1%	15.0%
Huntington Beach	4.0%	13.1%	8.4%	23.1%	26.9%
La Habra	11.8%	22.7%	17.7%	30.3%	7.4%
Lake Forest	4.9%	12.8%	19.6%	16.7%	26.5%
Mission Viejo	3.1%	7.8%	13.2%	17.5%	12.4%
Newport Beach	1.8%	6.9%	5.2%	19.2%	1.2%
Orange	9.0%	22.0%	7.7%	28.5%	19.2%
Rancho Santa Margarita	4.5%	18.6%	13.9%	13.2%	45.0%
San Clemente	1.7%	12.7%	4.9%	10.6%	0.0%
Santa Ana	23.1%	27.8%	9.4%	40.5%	10.1%
Tustin	10.1%	21.4%	12.4%	18.4%	47.4%
Orange County	9.6%	20.6%	12.0%	29.8%	17.7%
California	9.9%	23.1%	17.2%	28.3%	18.9%

Source: ACS 2009-2013 5Yr Est. Table S1602

B. Household Profile

Household Growth

Table 3-7 details the number and growth rate of households within the 16 cities, Orange County, and the State of California between 2000 and 2015. In general, there was consistent positive growth on the city, county, and state levels during both the 2000–2010 and 2010–2015 time periods. During the last five years, the City of Tustin experienced the largest percent increase number of household at 3.0 percent -- larger than the 2.0 percent growth rate for both Orange County and California. Over a 15-year period (2000-2015), the City of Lake Forest witnessed the largest percentage increase in households, with an increase of 32.9 percent. The only other cities to experience double-digit growth during the 15-year period were San Clemente (24.0%) and Newport Beach (17.3%). In comparison, total households within Orange County increased by 8.2 percent and within California by 11.5 percent between 2000 and 2015. The City of Garden Grove had the lowest overall household growth rate, with a 0.5 percent increase between 2000 and 2015, followed by La Habra (0.9%), Santa Ana (1.0%), and Buena Park (2.0%).

Table 3-7: Household Growth 2000-2015

City/Area	2000	2010	2015	% Change 2000-2010	% Change 2010-2015
Anaheim	96,969	98,294	100,406	1.4%	2.1%
Buena Park	23,332	23,686	23,788	1.5%	0.4%
Costa Mesa	39,206	39,946	40,404	1.9%	1.1%
Fountain Valley	18,162	18,648	18,785	2.7%	0.7%
Fullerton	43,609	45,391	45,978	4.1%	1.3%
Garden Grove	45,791	46,037	46,020	0.5%	0.0%
Huntington Beach	73,657	74,285	76,028	0.9%	2.3%
La Habra	18,947	18,977	19,108	0.2%	0.7%
Lake Forest	20,008	26,224	26,580	31.1%*	1.4%
Mission Viejo	32,449	33,208	33,596	2.3%	1.2%
Newport Beach	33,071	38,751	38,779	17.2%	0.1%
Orange	40,946	43,367	43,528	5.9%	0.4%
Rancho Santa Margarita	16,253	16,665	16,714	2.5%	0.3%
San Clemente	19,395	23,906	24,049	23.3%	0.6%
Santa Ana	73,002	73,174	73,765	0.2%	0.8%
Tustin	23,831	25,203	25,956	5.8%	3.0%
Orange County	935,287	992,781	1,012,422	6.1%	2.0%
California	11,502,871	12,577,498	12,830,035	9.3%	2.0%

Sources: Census 2010 Redistricting Data; CA Dept of Finance E-5 Est., January 2015

**Growth attributed to the annexation of Foothill Ranch and Portola, which occurred in late 2000.*

Tenure

Table 3-8 shows the distribution of total occupied housing units by tenure in 2000 and 2013. In general, the percentage of renter households increased more than owner household in most of the 16 cities, a trend also displayed on the county and state levels. The exceptions were the Cities of Fullerton, San Clemente, and Tustin where the percentage of renters declined from 2000 to 2013. For example, renters in the City of San Clemente represented 37.6 percent of all households in the city in 2000, but declined to 34.4 percent by 2013. The city with the highest percentage of renters in 2013 was Costa Mesa, where nearly 60 percent of total households were renters. Other cities with large percentages of renter households in 2013 were Santa Ana (54.0%), Anaheim (52.2%), and Tustin (49.4%). The cities with low percentages of renter households in 2013 were Mission Viejo (21.6%), Rancho Santa Margarita (28.2%), Fountain Valley (29.0%), and Lake Forest (29.9%).

Table 3-8
Household Tenure

Cities	2000		2013	
	Owner	Renter	Owner	Renter
Anaheim	50.0%	50.0%	47.8%	52.2%
Buena Park	57.1%	42.9%	56.1%	43.9%
Costa Mesa	40.5%	59.5%	40.3%	59.7%
Fountain Valley	74.7%	25.3%	71.0%	29.0%
Fullerton	53.9%	46.1%	54.4%	45.6%
Garden Grove	59.6%	40.4%	55.8%	44.2%
Huntington Beach	60.6%	39.4%	59.2%	40.8%
La Habra	56.6%	43.4%	55.3%	44.7%
Lake Forest	72.0%	28.0%	70.1%	29.9%
Mission Viejo	81.4%	18.6%	78.4%	21.6%
Newport Beach	55.7%	44.3%	55.4%	44.6%
Orange	62.6%	37.4%	59.5%	40.5%
Rancho Santa Margarita	78.3%	21.7%	71.8%	28.2%
San Clemente	62.4%	37.6%	65.6%	34.4%
Santa Ana	49.3%	50.7%	46.0%	54.0%
Tustin	49.6%	50.4%	50.6%	49.4%
Orange County	61.4%	38.6%	58.7%	41.3%
California	56.9%	43.1%	55.3%	44.7%

Source: Census 2000 SF 1 Table DP-1, ACS 2009-2013 5-Yr. Est. Table DP04

Household Size

Household size is an important indicator identifying sources of population growth as well as overcrowding in individual housing units. A city's average household size will increase over time if trends move toward larger families. In communities where the population is aging, the average household size typically declines. Growth trends in the city can be attributed to cultural differences in relation to household size, privacy, and co-habitation of extended families. For instance, single-person households or seniors may often occupy smaller apartments or condominiums due to the lower cost and size of such homes. Younger families with children often prefer larger single-family homes. Understanding changes in household composition can thus provide insight into current and future housing needs.

According to the 2013 ACS data presented in Table 3-9, the average household size of Orange County declined slightly from 3.02 in 2000 to 3.00 in 2013. However, at the city level, the household size changed significantly between 2000 and 2013 in several of the 16 cities. For example, cities such as Buena Park, Fullerton, Garden Grove, La Habra, Newport Beach, and Tustin experienced a decline of 0.15 to 0.22 in average household size. The Cities of Costa Mesa, Fountain Valley and Mission Viejo exhibited increases over the 2000 to 2013 period, with the City of Santa Ana experiencing the largest increase from 4.45 to 4.55 over this period.

Table 3-9: Average Household Size by Tenure

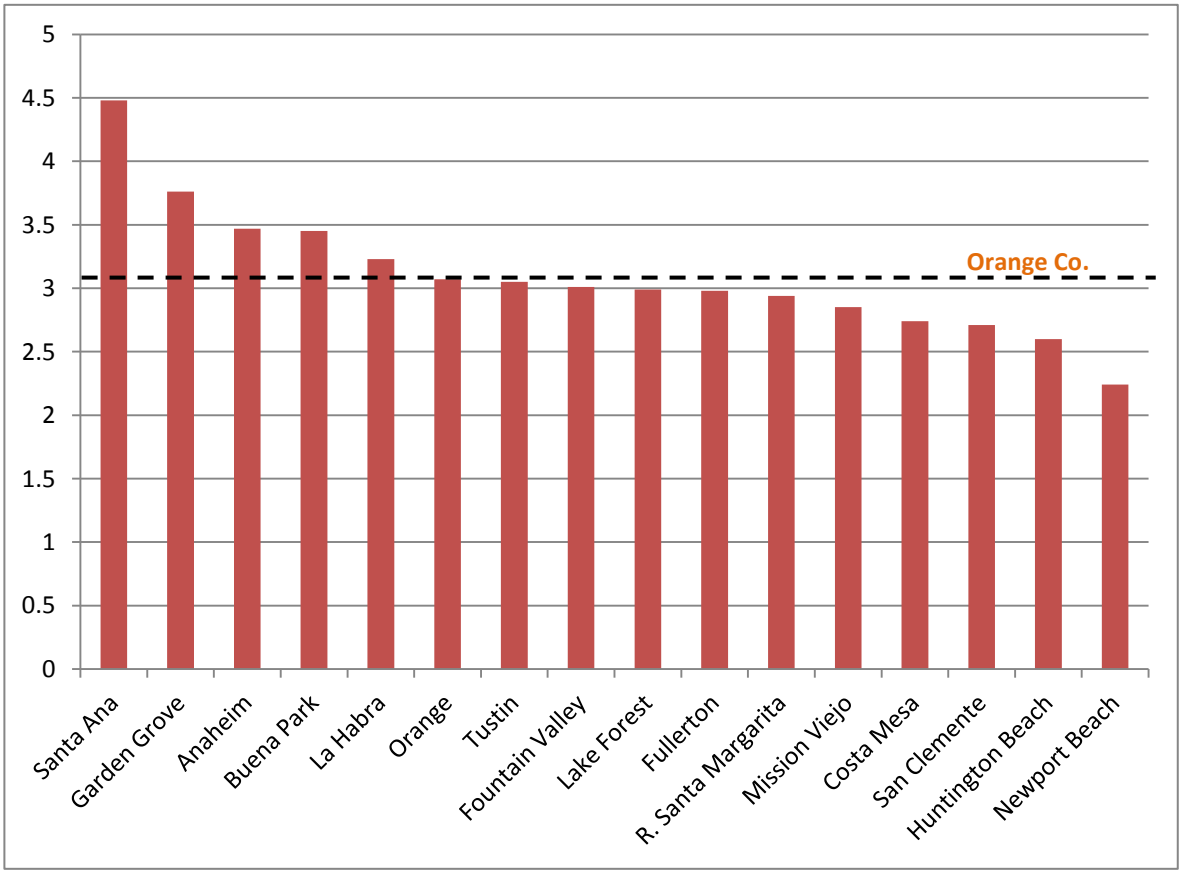
City/Area	2000			2013		
	Total	Owner	Renter	Total	Owner	Renter
Anaheim	3.39	3.46	3.33	3.34	3.24	3.45
Buena Park	3.51	3.39	3.66	3.32	3.28	3.36
Costa Mesa	2.68	2.72	2.65	2.69	2.66	2.71
Fountain Valley	2.97	3.07	2.73	3.00	3.07	2.79
Fullerton	3.02	2.97	3.08	2.83	2.87	2.77
Garden Grove	3.72	3.72	3.71	3.56	3.49	3.67
Huntington Beach	2.59	2.60	2.59	2.56	2.58	2.54
La Habra	3.25	3.07	3.47	3.08	3.04	3.13
Lake Forest	2.89	2.86	2.97	2.89	2.93	2.79
Mission Viejo	2.80	2.76	2.92	2.84	2.87	2.71
Newport Beach	2.24	2.38	2.06	2.09	2.30	1.83
Orange	3.07	2.99	3.20	3.02	2.91	3.20
Rancho Santa Margarita	2.94	3.06	2.64	2.90	3.06	2.35
San Clemente	2.63	2.66	2.58	2.56	2.59	2.51
Santa Ana	4.45	4.47	4.42	4.55	4.54	4.57
Tustin	3.04	2.96	3.13	2.82	2.70	2.93
Orange County	3.02	3.00	3.06	3.00	2.96	3.05
California	2.94	2.98	2.88	2.87	2.93	2.79

Source: Census 2000 SF1 Table H012, ACS 2009-2013 5Yr Est. Table B25010

Table 3-9 also shows the difference in household sizes by tenure. It shows that at the countywide level, renters had larger household sizes than owners for both 2000 and 2013. At the city level, household size patterns varied among cities. Renters had larger household sizes than owners in cities such as Anaheim, Garden Grove, Orange, and Tustin, while in cities such as Fountain Valley, Lake Forest, Mission Viejo, Newport Beach, and Rancho Santa Margarita, owner household sizes were higher than renters in 2013.

Figure 3-4 illustrates the most recent average household sizes estimated by the California State Department of Finance (DOF), which provides annual estimates of population, household and housing for all cities in the state. The 2015 DOF data shows that the County's average household size is 3.06. It also shows that the City of Santa Ana has the largest household size among the all 16 cities at 4.48. In fact, according to the DOF estimates, Santa Ana is tied with the Cities of South El Monte and Parlier as having the ninth highest household size among all California cities -- the city with the state's highest household is Greenfield (Monterey County) at 4.82.

Figure 3-4: Household Size



Source: DOF 2015 Estimates

C. Income Profile

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities. Although economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity and other factors often create misconceptions and biases that raise fair housing issues.

County Income Limits

Most state and federal housing programs are benchmarked to specific income limits. Consistent with federal regulations, income categories defined by HUD are: extremely low income (0-30% of Area Mean Income); low income (31-50% of AMI); moderate income (51-80% of AMI); and above moderate (greater than 80% of AMI). HUD does not publish income limits for above moderate income households as federal housing programs are not eligible to households earning greater than 80 percent of the AMI. Table 3-10 presents HUD and State income limits by income group for Orange County.

The State of California also provides income limits that are updated annually, in accordance with procedures established by HUD at the federal level. The State income limits apply to designated programs and are used to determine applicant eligibility and to calculate affordable housing costs for applicable housing assistance programs.

Table 3-10: 2015 HUD and State Income Limits for Orange County

Income Group	Percent AMI	2015 Income Limit
HUD		
Extremely Low	≤ 30%	$28,900
Low	31% - 50%	$48,150
Moderate	51%-80%	$77,050
Above Moderate	>80%	$77,050+
State		
Extremely Low	≤ 30%	$28,900
Very Low	31% - 50%	$48,150
Low	51%-80%	$77,050
Moderate	81% - 120%	$104,650
Above Moderate	> 120%	--

Source: HUD and State HCD, Income Limits 2015
Based on $87,200 AMI for a four-person household

Household Income

As estimated in the 2013 ACS, the median household income in Orange County was $75,422 and the median family household income was $84,765. The difference between the two is that a family consists of two or more people (one of whom is the householder) related by birth, marriage, or adoption residing in the same housing unit. A household consists of all people who occupy a housing unit regardless of relationship. A household may consist of a person living alone or multiple unrelated individuals or families living together. Table 3-11 lists the income figures for each of the 16 cities and also compares these figures to Orange County and California. As shown in the table, the following cities had median household incomes significantly above the County median of $75,422: Newport Beach ($106,333), Rancho Santa Margarita ($104,113), Mission Viejo ($96,210), Lake Forest ($93,631), and San Clemente ($90,071) -- cities located primarily in the southern portion of Orange County. Cities with median household incomes significantly lower than the countywide median included: Santa Ana ($53,335), Anaheim ($59,165), Garden Grove ($59,648), and La Habra ($61,702) -- cities located more in the northern portion of the county.

Table 3-11: Median Household Income

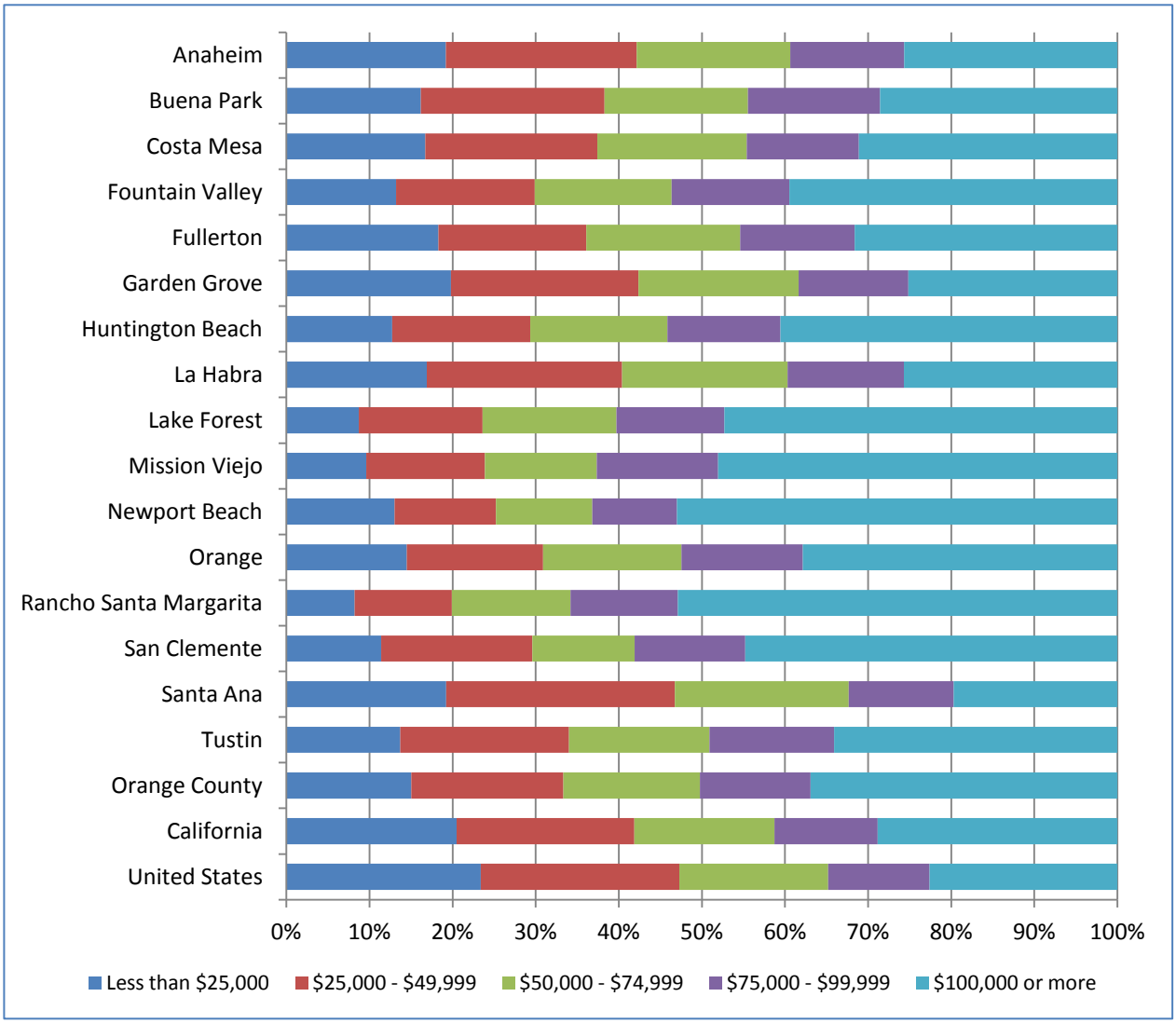
Cities	Median Household Income	Median Family Households Income
Anaheim	$59,165	$63,380
Buena Park	$66,371	$70,703
Costa Mesa	$65,830	$75,810
Fountain Valley	$80,870	$90,317
Fullerton	$67,384	$76,760
Garden Grove	$59,648	$61,890
Huntington Beach	$81,389	$97,443
La Habra	$61,702	$68,218
Lake Forest	$93,631	$108,636
Mission Viejo	$96,210	$108,545
Newport Beach	$106,333	$146,011
Orange	$78,838	$86,226
Rancho Santa Margarita	$104,113	$118,383
San Clemente	$90,071	$106,382
Santa Ana	$53,335	$51,045
Tustin	$73,194	$80,897
Orange County	$75,422	$84,765
California	$61,094	$69,661

Source: ACS 2009-2013 5Yr Est. DP03

Household Income Distribution

Additional analysis was completed on incomes by household distribution, as shown in Figure 3-5. Almost all cities had significant proportions (over 20%) of their households with incomes of $100,000 or more, with the exception of the City of Santa Ana. In fact, one-half of the households in the Cities of Newport Beach and Rancho Santa Margarita earn more than $100,000 annually. On the other end of the spectrum, cities where 40 to 50 percent of the households earning less than $50,00 per year included Santa Ana, Garden Grove, Anaheim, and La Habra.

Figure 3-5: Household Distribution by Income 2013



Source: ACS 2009-2013 5 Yr Est. Table DP03

Poverty Level

Table 3-12 presents the percentage of family households below the poverty line in 2013. It shows that countywide, approximately nine percent of all families were below the poverty level. The City of Santa Ana's percentage of families below poverty (18.5%) was double the countywide figure in 2013. Other cities with family poverty levels higher than the countywide average poverty level included Garden Grove (13.6%), Anaheim (13.3%), Fullerton (11.1%), La Habra (11.0%), Costa Mesa (10.6%), and Tustin (9.0%). As indicated in the table below, single female headed households, and especially those with children, evidence much higher rates of poverty than family households as a whole.

Table 3-12
Family Households Below Poverty Level, 2013

City/Area	All Family HHs	Families HHs with Children < 18 Yrs	Single Female Headed HH	Single Female Headed HHs with Children < 18 Yrs
Anaheim	13.3%	19.1%	31.8%	41.5%
Buena Park	9.0%	13.2%	18.1%	25.0%
Costa Mesa	10.6%	16.9%	20.6%	29.2%
Fountain Valley	5.5%	8.6%	14.6%	28.1%
Fullerton	11.1%	16.9%	24.2%	34.0%
Garden Grove	13.6%	19.2%	21.8%	31.4%
Huntington Beach	5.8%	8.6%	14.0%	21.7%
La Habra	11.0%	16.1%	20.0%	31.6%
Lake Forest	4.2%	5.4%	8.8%	13.5%
Mission Viejo	3.4%	4.5%	11.3%	14.5%
Newport Beach	5.5%	6.2%	21.5%	20.8%
Orange	8.2%	13.2%	19.9%	30.6%
Rancho Santa Margarita	3.4%	3.9%	13.5%	18.8%
San Clemente	5.4%	9.0%	17.8%	25.3%
Santa Ana	18.5%	24.8%	31.8%	43.9%
Tustin	9.0%	12.1%	20.5%	23.9%
Orange County	8.8%	13.1%	21.0%	29.6%
California	12.0%	17.8%	27.4%	36.8%

Source: ACS 2009-2013 5Yr Est. Table DP03

Household Income by Tenure

The U.S. Department of Housing and Urban Development (HUD) periodically receives "custom tabulations" of data from the U.S. Census Bureau that are largely not available through standard Census products, referred to as the Comprehensive Housing Affordability Strategy (CHAS) data. The most recently available CHAS estimates are derived from the 2008-2012 ACS. The primary purpose of the CHAS data is to investigate the extent of housing problems and housing needs, particularly for low income households. This is estimated by the number of households that have certain housing problems and have income low enough to qualify for HUD's programs (primarily 30, 50, and 80 percent of AMI). The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds

Table 3-13 details CHAS estimates of the distribution of households by income levels in 2012. Income levels of owners and renters were compared at the county and city levels. In summary, there was a major difference in the composition of the extremely low and low income households between the renter and owner categories. In Orange County 42 percent of the renters earned less than 50 percent of the area median income (AMI), while just 17 percent of homeowners earned less than this level of income. The following cities had over one half of their renters earning 50 percent or less of the AMFI: Santa Ana (56%), Garden Grove (55%), Anaheim (53%) and Buena Park (53%).

In Orange County, 57 percent of owner households were in the income category that earn above 100 percent of the AMI. The eight cities that have their owner households above the County figure include: Newport Beach (74%), Orange (70%), San Clemente (64%), Lake Forest (64%), Mission Viejo (64%), Huntington Beach (62%), Orange (60%), and Tustin (60%).

On the other hand, just 26 percent of renter households in Orange County are in the income category that earn above 100 percent of the AMI. The following eight cities have renters below the County average: Fountain Valley (25%), Orange (25%), Fullerton (21%), Anaheim (15%), Buena Park (15%), La Habra (14%), Garden Grove (14%), and Santa Ana (11%).

Table 3-13: Income Levels by Tenure 2012

City/County	Total HHs	Extremely Low 0-30% AMI		Low 31-50% AMI		Moderate 51-80% AMI		Above Moderate 81-100% AMI		Above 100% AMI	
Anaheim	98,435	18,890	19.2%	16,935	17.2%	21,065	21.4%	10,925	11.1%	30,620	31.1%
Owner	47,620	3,905	8.2%	5,260	11.0%	9,285	19.5%	6,260	13.1%	22,910	48.1%
Renter	50,810	14,985	29.5%	11,675	23.0%	11,780	23.2%	4,665	9.2%	7,710	15.2%
Buena Park	22,730	3,545	15.6%	3,725	16.4%	5,175	22.8%	2,625	11.5%	7,655	33.7%
Owner	13,070	815	6.2%	1,335	10.2%	2,980	22.8%	1,705	13.0%	6,235	47.7%
Renter	9,660	2,730	28.3%	2,390	24.7%	2,195	22.7%	920	9.5%	1,420	14.7%
Costa Mesa	40,525	6,070	15.0%	5,590	13.8%	8,205	20.2%	5,020	12.4%	15,630	38.6%
Owner	16,525	1,680	10.2%	1,575	9.5%	2,500	15.1%	1,630	9.9%	9,135	55.3%
Renter	24,000	4,390	18.3%	4,015	16.7%	5,705	23.8%	3,390	14.1%	6,495	27.1%
Fountain Valley	18,575	2,010	10.8%	1,815	9.8%	3,645	19.6%	2,225	12.0%	8,875	47.8%
Owner	13,320	915	6.9%	1,125	8.4%	2,255	16.9%	1,475	11.1%	7,550	56.7%
Renter	5,250	1,095	20.9%	690	13.1%	1,390	26.5%	750	14.3%	1,325	25.2%
Fullerton	44,575	7,645	17.2%	6,215	13.9%	8,135	18.3%	4,695	10.5%	17,890	40.1%
Owner	24,080	1,920	8.0%	2,305	9.6%	3,405	14.1%	2,830	11.8%	13,625	56.6%
Renter	20,490	5,725	27.9%	3,910	19.1%	4,730	23.1%	1,865	9.1%	4,265	20.8%
Garden Grove	45,930	9,470	20.6%	7,525	16.4%	10,265	22.3%	5,355	11.7%	13,315	29.0%
Owner	25,830	2,580	10.0%	3,300	12.8%	5,875	22.7%	3,515	13.6%	10,560	40.9%
Renter	20,100	6,890	34.3%	4,225	21.0%	4,390	21.8%	1,840	9.2%	2,755	13.7%
Huntington Beach	74,045	8,275	11.2%	7,945	10.7%	12,375	16.7%	7,855	10.6%	37,600	50.8%
Owner	44,530	3,265	7.3%	3,775	8.5%	5,950	13.4%	4,030	9.1%	27,515	61.8%
Renter	29,515	5,010	17.0%	4,170	14.1%	6,425	21.8%	3,825	13.0%	10,085	34.2%
La Habra	18,370	3,335	18.2%	2,890	15.7%	4,205	22.9%	2,115	11.5%	5,825	31.7%
Owner	10,100	1,120	11.1%	1,070	10.6%	1,950	19.3%	1,285	12.7%	4,675	46.3%
Renter	8,270	2,215	26.8%	1,820	22.0%	2,255	27.3%	830	10.0%	1,150	13.9%
Lake Forest	27,050	2,015	7.4%	2,580	9.5%	4,390	16.2%	3,150	11.6%	14,915	55.1%
Owner	19,195	950	4.9%	1,475	7.7%	2,600	13.5%	1,970	10.3%	12,200	63.6%
Renter	7,860	1,065	13.5%	1,105	14.1%	1,790	22.8%	1,180	15.0%	2,715	34.5%

Table 3-13: Income Levels by Tenure 2012

City/County	Total HHs	Extremely Low 0-30% AMI		Low 31-50% AMI		Moderate 51-80% AMI		Above Moderate 81-100% AMI		Above 100% AMI	
Mission Viejo	33,235	2,520	7.6%	3,440	10.4%	5,065	15.2%	3,205	9.6%	19,005	57.2%
Owner	25,790	1,350	5.2%	2,070	8.0%	3,470	13.5%	2,500	9.7%	16,400	63.6%
Renter	7,440	1,170	15.7%	1,370	18.4%	1,595	21.4%	705	9.5%	2,605	35.0%
Newport Beach	38,345	4,175	10.9%	3,060	8.0%	4,090	10.7%	2,615	6.8%	24,405	63.6%
Owner	21,115	1,605	7.6%	1,165	5.5%	1,710	8.1%	1,115	5.3%	15,520	73.5%
Renter	17,230	2,570	14.9%	1,895	11.0%	2,380	13.8%	1,500	8.7%	8,885	51.6%
Orange	43,115	5,730	13.3%	4,835	11.2%	8,070	18.7%	4,600	10.7%	19,880	46.1%
Owner	26,260	1,750	6.7%	2,070	7.9%	4,120	15.7%	2,670	10.2%	15,655	59.6%
Renter	16,855	3,980	23.6%	2,765	16.4%	3,950	23.4%	1,930	11.5%	4,225	25.1%
Rancho Santa Margarita	16,370	1,125	6.9%	1,330	8.1%	2,200	13.4%	1,930	11.8%	9,790	59.8%
Owner	11,775	455	3.9%	720	6.1%	1,210	10.3%	1,155	9.8%	8,240	70.0%
Renter	4,595	670	14.6%	610	13.3%	990	21.5%	775	16.9%	1,550	33.7%
San Clemente	24,070	2,560	10.6%	2,605	10.8%	3,830	15.9%	2,315	9.6%	12,760	53.0%
Owner	15,690	1,160	7.4%	1,140	7.3%	1,875	12.0%	1,430	9.1%	10,085	64.3%
Renter	8,380	1,400	16.7%	1,465	17.5%	1,955	23.3%	885	10.6%	2,675	31.9%
Santa Ana	72,635	15,770	21.7%	15,250	21.0%	18,725	25.8%	8,315	11.4%	14,575	20.1%
Owner	34,265	4,105	12.0%	5,605	16.4%	9,025	26.3%	5,340	15.6%	10,190	29.7%
Renter	38,370	11,665	30.4%	9,645	25.1%	9,700	25.3%	2,975	7.8%	4,385	11.4%
Tustin	24,715	3,455	14.0%	3,340	13.5%	4,840	19.6%	2,420	9.8%	10,665	43.2%
Owner	12,620	830	6.6%	1,120	8.9%	1,970	15.6%	1,185	9.4%	7,515	59.5%
Renter	12,095	2,625	21.7%	2,220	18.4%	2,870	23.7%	1,235	10.2%	3,150	26.0%
Orange County	990,265	141,360	14.3%	127,185	12.8%	178,110	18.0%	102,330	10.3%	441,275	44.6%
Owner	587,210	45,885	7.8%	54,810	9.3%	90,840	15.5%	60,240	10.3%	335,435	57.1%
Renter	403,055	95,475	23.7%	72,375	18.0%	87,270	21.7%	42,090	10.4%	105,840	26.3%

Source: CHAS Data 2008-2012

D. Special Needs Households

Certain households, because of their unique characteristics and needs, have more barriers to finding decent and affordable housing. These households are considered "special needs groups" and include families with female heads of household, large households, seniors, persons with disabilities, persons with HIV/AIDS, and homeless persons or families in need of emergency shelter. Due to their physical or socioeconomic conditions, their greater need for support services or special accommodations, or other factors, special needs households may have some difficulties in finding affordable housing. In certain situations they may be more susceptible to discriminatory housing practices. The following discussion highlights particular characteristics that could impede fair housing access for special needs groups.

Female-Headed Households with Children

Single-parent families, particularly female-headed families with children, often require special consideration and assistance because of their greater need for affordable housing and accessible day care, healthcare and other supportive services. Because of their relatively lower income and higher living expenses, female-headed families have comparatively limited opportunities for finding affordable and decent housing. Fair housing service providers have indicated that female-headed families may also be discriminated against in the rental housing market because some landlords are concerned about the ability of these households to make regular rent payments. Consequently, landlords may require more stringent credit checks or higher security deposits for women, which would be a violation of fair housing laws.

As presented in Table 3-14 single female head of households with children represents 5.9 percent of the total countywide households in 2013. Single female-headed family households with children were also three times more prevalent than single male family households with children. The cities with the highest percentage of single female head family households include the Cities of Santa Ana (10.0%), Anaheim (8.5%), and Tustin (8.4%).

Table 3-14: Household Characteristics 2013

City/Area	Households			Family Households			
	% With Person(s) Age 65+	% With Persons Under 18	Ave. HH Size	% of Total HH	% Single Female HH with Children	% Single Male HH with Children	Ave. Family HH Size
Anaheim	22.8%	44.7%	3.39	76.0%	8.5%	2.6%	3.86
Buena Park	27.3%	42.2%	3.51	81.9%	8.0%	4.1%	3.78
Costa Mesa	17.5%	30.5%	2.68	59.5%	6.3%	2.0%	3.34
Fountain Valley	37.1%	31.6%	2.97	75.8%	4.2%	1.7%	3.40
Fullerton	24.7%	35.4%	3.02	70.5%	5.9%	2.2%	3.50
Garden Grove	28.1%	45.5%	3.72	79.5%	7.7%	2.6%	4.09
Huntington Beach	27.2%	28.1%	2.59	65.6%	4.7%	1.8%	3.13
La Habra	23.4%	41.7%	3.25	76.0%	6.1%	3.9%	3.74
Lake Forest	19.9%	38.3%	2.89	75.1%	4.6%	1.8%	3.36
Mission Viejo	28.8%	34.5%	2.80	74.8%	3.2%	1.5%	3.23
Newport Beach	30.7%	20.9%	2.24	54.8%	3.2%	1.0%	2.90
Orange	24.2%	36.8%	3.07	72.2%	6.4%	2.7%	3.53
Rancho Santa Margarita	13.3%	44.8%	2.94	77.8%	7.4%	2.3%	3.38
San Clemente	26.0%	34.5%	2.63	69.9%	5.1%	2.0%	3.15
Santa Ana	21.0%	55.5%	4.45	81.7%	10.0%	4.6%	4.64
Tustin	17.7%	42.8%	3.04	72.3%	8.4%	2.8%	3.55
Orange County	25.7%	37.1%	3.02	71.6%	5.9%	2.2%	3.53
California	24.9%	36.8%	2.94	68.6%	7.2%	2.7%	3.53

Source: ACS 2009-2013 5Yr Est. Table DP02

Large Households

Large households are defined as having five or more members. These households are usually families with more than one child or families with extended family members such as in-laws or grandparents. These can also include multiple families living in one housing unit in order to save on housing costs. Large households are a special needs group because the availability of adequately sized, affordable housing units is often limited. To save for necessities such as food, clothing and medical care, lower- and moderate-income large households may reside in smaller units, resulting in overcrowding. Furthermore, families with children, especially those who are renters, may face discrimination or differential treatment in the housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex,

confine them to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether, which would violate fair housing laws.

Table 3-15 displays the percentage of households by the number of persons by owner and renter in 2013. In general, on the city, county, and state levels, households with five or more members are more prevalent among renter households than among owner households. The only exceptions were the Cities of Fountain Valley, Newport Beach, and Rancho Santa Margarita. Santa Ana had the largest percent of large households (5 or more persons in household) among both renters (38.6%) and owners (37.9%), followed by Garden Grove (25.7% of renter households and 24.9% of owner households). Among renter households, other cities with the high percentages of large households were La Habra (25.7%), Buena Park (23.2%), and Anaheim (22.0%). For owner households, Anaheim (20.5%) and Buena Park (19.9%) also had high occurrences of households with five or more members. For both types of tenure, the city with the lowest percent of large households was Newport Beach – 2.6 percent of total renter households and 6.8 percent of total owner households.

Table 3-15: Persons Per Owner and Renter Households, 2013

City/Area	Owner Households				Renter Household			
	1	2	3-4	5+	1	2	3-4	5+
Anaheim	14.9%	28.4%	36.1%	20.5%	21.2%	24.2%	32.6%	22.0%
Buena Park	14.5%	27.5%	38.1%	19.9%	11.7%	24.7%	40.4%	23.2%
Costa Mesa	24.2%	34.5%	32.0%	9.3%	29.6%	33.9%	24.7%	11.9%
Fountain Valley	15.2%	34.3%	36.4%	14.1%	29.5%	28.9%	30.7%	10.9%
Fullerton	17.7%	33.4%	36.2%	12.7%	24.0%	27.2%	32.3%	16.5%
Garden Grove	14.9%	25.4%	34.9%	24.9%	15.4%	19.5%	39.4%	25.7%
Huntington Beach	21.8%	40.1%	30.3%	7.8%	30.5%	32.2%	28.4%	8.9%
La Habra	18.2%	31.6%	36.3%	13.9%	20.7%	19.7%	34.6%	24.9%
Lake Forest	18.8%	32.1%	39.4%	9.7%	24.9%	26.2%	32.2%	16.7%
Mission Viejo	18.2%	37.8%	35.4%	8.7%	25.0%	24.1%	37.3%	13.6%
Newport Beach	27.5%	41.9%	23.8%	6.8%	41.6%	34.1%	21.7%	2.6%
Orange	17.3%	34.5%	35.3%	12.9%	24.1%	25.3%	30.1%	20.4%
Rancho Santa Margarita	13.5%	28.3%	46.1%	12.2%	30.8%	24.6%	34.3%	10.3%
San Clemente	19.0%	39.1%	33.2%	8.7%	32.4%	30.1%	26.5%	11.0%
Santa Ana	12.0%	19.1%	31.0%	37.9%	14.1%	16.2%	31.1%	38.6%
Tustin	22.0%	29.2%	35.2%	13.6%	22.2%	25.5%	34.3%	18.0%
Orange County	19.0%	33.1%	34.3%	13.6%	25.3%	26.4%	31.3%	16.9%
California	20.0%	33.4%	32.6%	14.0%	29.5%	25.6%	30.1%	14.8%

Source: ACS 2009-2013 5Yr Est. Table B25009

Seniors

As shown previously in Tables 3-2 and 3-3 in the Age Composition section of this chapter, the elderly (persons over the age of 65) comprised 12.0 percent of total Orange County residents in 2013, and 5.5 percent in the over 75 years, which is considered "frail elderly." Eleven percent of the population was between 55 and 64 years of age, comprising the "future elderly" generation that will age into senior status in the upcoming years. Cities which exceed or equal the countywide percent of elderly residents include Newport Beach (19.3%), Fountain Valley (18.2%), Mission Viejo (15.1%), Huntington Beach (14.8%), San Clemente (13.9%), and Fullerton (12.0%). In terms of households, previous Table 3-15 shows that approximately one-quarter (25.7%) of total Orange County households have one or more elderly members. The cities with high percentages of total households featuring one or more persons over the age of 65 were Fountain Valley (37.1%), Newport Beach (30.7%), Mission Viejo (28.8%), and Garden Grove (28.1%).

Persons with Disabilities

Fair housing choice for persons with disabilities can be compromised based on the nature of their disability. Fair housing service providers have indicated at persons with physical disabilities may face discrimination in the housing market because of the need for wheelchairs, home modifications to improve accessibility or other forms of assistance. Landlords/owners sometimes fear that a unit might sustain wheelchair damage or might refuse to exempt disabled tenants with service/guide animals from a no-pet policy. A major barrier to housing for people with mental disabilities is opposition based on the stigma of mental disability. Landlords sometimes refuse to rent to tenants with a history of mental illness. Neighbors may object when a house becomes a group home for persons with mental disabilities.

Table 3-16 presents information on persons with disabilities in Orange County and the 16 cities. As shown in the table, Orange County residents with a disability account of 5.5 percent of the 18-64 age group and 31.6 percent of the senior population. Of the 16 cities participating in this AI, Santa Ana has the highest percentage of residents with a disability, with 7.1 percent of the 18-64 age group and 38.4 percent of seniors. The type of disability most prevalent among countywide residents, especially among seniors, include ambulatory difficulties (19.8%) and those with independent living difficulties (15.7%).

Other cities with relatively high percentage of residents with a disability include Garden Grove (6.4% of the 18-64 age group and 36.9% of seniors) and La Habra (7.1% of the 18-64 age group and 34.7% of seniors). Ambulatory difficulties and independent living difficulties appear to be the key types of disabilities among senior residents. Again, the City of Garden Grove has the highest percentages in both categories for seniors with 24.2 percent with ambulatory difficulties and 19.9 percent with independent living difficulties. As Table 3-17 shows, other cities with a relatively high proportion of seniors with these two difficulties include Costa Mesa, Anaheim, Santa Ana, La Habra and Tustin.

Table 3-16: Disability Characteristics of Seniors and Working-Age Adults 2013

City/Area	Age Group	% Pop. with a Disability	Type of Disability					
			Hearing Difficulty	Vision Difficulty	Cognitive Difficulty	Ambulatory Difficulty	Self-Care Difficulty	Independent Living Difficulty
Anaheim	18-64	6.0%	1.0%	0.9%	2.4%	2.9%	1.1%	2.4%
	65+	35.5%	12.7%	6.4%	10.4%	23.5%	11.7%	19.2%
Buena Park	18-64	6.8%	1.0%	1.2%	2.8%	3.5%	1.4%	2.2%
	65+	34.5%	14.9%	7.7%	11.9%	21.5%	9.3%	16.0%
Costa Mesa	18-64	5.6%	1.0%	1.3%	2.5%	2.6%	1.2%	2.0%
	65+	34.6%	13.8%	6.4%	11.8%	24.2%	10.6%	17.3%
Fountain Valley	18-64	5.8%	1.3%	1.3%	2.4%	2.7%	1.3%	2.1%
	65+	30.2%	12.0%	5.4%	9.1%	18.9%	7.9%	14.6%
Fullerton	18-64	5.8%	1.0%	1.3%	2.3%	2.7%	1.0%	2.2%
	65+	32.6%	14.0%	6.5%	9.2%	18.8%	8.8%	15.1%
Garden Grove	18-64	6.4%	1.2%	1.0%	3.0%	2.9%	1.2%	2.7%
	65+	36.9%	13.7%	6.1%	13.4%	24.2%	12.4%	19.9%
Huntington Beach	18-64	5.3%	1.2%	0.7%	2.2%	2.5%	1.1%	1.7%
	65+	28.9%	13.3%	4.5%	8.3%	17.2%	7.1%	12.1%
La Habra	18-64	7.1%	1.2%	1.2%	2.6%	3.9%	1.1%	2.4%
	65+	34.7%	12.6%	6.0%	8.8%	22.8%	8.0%	16.5%
Lake Forest	18-64	4.5%	1.3%	0.8%	1.6%	2.0%	1.2%	1.5%
	65+	28.1%	11.0%	4.2%	8.2%	17.7%	7.9%	14.8%
Mission Viejo	18-64	4.8%	1.1%	0.5%	2.0%	2.1%	1.1%	1.7%
	65+	30.0%	13.1%	6.8%	11.2%	21.9%	11.4%	15.9%
Newport Beach	18-64	3.2%	0.7%	0.3%	1.3%	1.2%	0.5%	1.0%
	65+	23.8%	10.2%	3.2%	6.1%	13.2%	5.5%	10.8%
Orange	18-64	5.1%	1.2%	0.9%	2.0%	2.0%	0.9%	2.1%
	65+	32.0%	12.4%	6.1%	7.7%	20.6%	9.5%	15.5%
Rancho Santa Margarita	18-64	3.6%	0.8%	0.9%	1.3%	1.1%	0.6%	0.9%
	65+	20.7%	9.4%	6.2%	6.7%	12.3%	4.4%	11.0%
San Clemente	18-64	6.0%	1.7%	0.7%	2.1%	2.4%	1.0%	1.7%
	65+	25.0%	13.1%	4.6%	6.0%	14.9%	6.9%	11.1%
Santa Ana	18-64	7.1%	1.0%	3.2%	2.0%	2.6%	1.1%	1.9%
	65+	38.4%	13.5%	11.2%	11.4%	22.7%	9.1%	18.1%
Tustin	18-64	4.5%	1.0%	1.1%	1.5%	1.8%	0.8%	1.4%
	65+	32.3%	9.9%	5.5%	9.3%	21.1%	11.5%	18.7%
Orange County	18-64	5.5%	1.0%	1.1%	2.1%	2.4%	1.0%	1.9%
	65+	31.6%	12.9%	5.9%	9.5%	19.8%	9.1%	15.7%
California	18-64	8.0%	1.5%	1.5%	3.4%	3.9%	1.6%	2.9%
	65+	36.8%	14.7%	6.9%	10.5%	24.0%	10.4%	18.2%

Source: ACS 2009-2013 5Yr Est. Table S1810
Note: Single person may have multiple difficulties.

Persons with disabilities might require special housing with ramps, elevators, modified bathrooms, kitchens and doorways. Therefore, the Fair Housing Act, as amended in 1988, requires that cities and counties provide reasonable accommodation to rules, policies, practices and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities. Although fair housing laws intend that all people have equal access to housing, the law also recognizes that people with disabilities may need extra tools to achieve equality. Reasonable accommodation is one of the tools intended to further housing opportunities for people with disabilities. For developers and providers of housing for people with disabilities, who are often confronted with siting or use restrictions, reasonable accommodation provides a means of requesting from the local government flexibility in the application of land-use, zoning and building code regulations or, in some instances, even a waiver of certain restrictions or requirements because it is necessary to achieve equal access to housing. Cities and counties are required to consider requests for accommodations related to housing for people with disabilities and to provide the accommodation when it is determined to be "reasonable" based on fair housing laws and the case law interpreting the statutes.

Persons with HIV/AIDS

According to the California Public Health Department, Center for Infectious Diseases, there were a total of 45,670 persons living with HIV and 71,883 persons living with AIDS within the State as of December 31, 2012. New drugs, better treatment, and preventive education have reduced the number of AIDS fatalities. However, new cases of HIV infection continue to occur. Between the years 2001 and 2013, there were a total of 4,174 new cases of HIV reported in Orange County, averaging 321 cases per year for the 13 year time period.

Persons with HIV/AIDS face an array of barriers to obtaining and maintaining affordable, stable housing. For persons living with HIV/AIDS, access to safe, affordable housing could be as important to their general health and wellbeing as access to quality healthcare. For many, the persistent shortage of stable housing can be the primary barrier to consistent medical care and treatment. In addition, persons with HIV/AIDS may be targets of hate crimes. Despite federal and state anti-discrimination laws, many people face illegal eviction from their homes when their illness is exposed. The Fair Housing Amendments Act of 1988, which is primarily enforced by HUD, prohibits housing discrimination against persons with disabilities, including persons with HIV/AIDS.

Homeless Persons

Over the last several decades, the increasing homeless population has become issues of local, regional, and national significance. Lack of affordable housing can exacerbate homelessness, and hinders a community's ability to effectively address this challenge. A homeless family or individual as defined by federal regulations is a person or family that lacks a fixed and regular nighttime residence. The homeless population can be divided into two major groups, the sheltered and the unsheltered homeless. Sheltered homeless are those individuals or families whose primary residence is an emergency shelter, transitional housing, a domestic violence shelter, a shelter for runaway children, or people living in a motel/hotel under a voucher arrangement. Unsheltered homeless are individual or families with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

Once every two years, Orange County conducts a count of the number of homeless in the county in a given 24-hour period, which is known as the Homeless Point-in-Time (PIT) count survey. The PIT is a one night snapshot of homelessness. The 2015 PIT count was conducted in the evening of January 23, 2015 for the sheltered count and the morning of January 24, 2015 for the unsheltered count.

In the 2015 PIT count survey, 4,452 homeless persons were counted, as shown in Table 3-17. The 2015 count was represents approximately 0.14 percent of the total countywide population. It was also slightly higher than the previous 2013 PIT count of 4,251 homeless persons. This increase of 201 homeless person between the 2013 and 2015 PIT count was a slight shift from previous counts between 2011 and 2013, when the homeless counts declined by 2,688 persons. The 2015 count survey also shows that 2,251 homeless persons (51%) live in shelters and the remaining 2,201 are unsheltered (49%). Of those living in shelters, approximately 40 percent were living in emergency shelters and 60 percent in transitional housing. These shelter facilities are defined as:

- **Emergency Shelter** – A facility that provides overnight shelter and fulfills a client's basic needs (i.e. food, clothing, medical care) either on-site or through off-site services. The permitted length of stay can vary from one day at a time to three months.
- **Transitional Housing** – A residence that provides housing for up to two years. Residents of transitional housing usually include supportive services designed to assist the homeless in achieving greater economic independence and a permanent, stable living situation. Services may include mental and physical health care interventions, substance abuse treatment, job training and employment services, individual and group counseling and life skills training. In addition, some substance abuse programs offer limited transitional housing services in addition to treatment.

Overall, homeless persons living in shelters declined by approximately 13 percent from the 2013 count, and homeless persons unsheltered increased by 31 percent from the 2013 count.

The 2015 PIT count survey also indicates there were 3,354 homeless households, and of the total homeless households, 61 percent lived in unsheltered conditions. Other key findings from the 2015 count include:

- 31 percent of all homeless persons are persons in households with children
- Almost all (99%+) of homeless families were housed in emergency shelters or transitional housing programs
- Five percent of homeless people are youths and young adults
- 13 percent of homeless adults have a serious mental illness, and nearly two-thirds are unsheltered
- 12 percent of homeless adults are veterans
- The number of chronically homeless declined by 30 percent and the homeless with chronic substance abuse declined by 54 percent from the 2013 count

Table 3-17: Homeless Point In Time Count 2013 and 2015

	2013		2015		% Change 2013-2015
	Number	Percent	Number	Percent	
HOMELESS PERSONS					
Sheltered	2,573	60.5%	2,251	50.6%	-12.5%
Emergency Shelter	1,145	44.5%	925	41.1%	-19.2%
Transitional Housing	1,428	55.5%	1,326	58.9%	-7.1%
Unsheltered	1,678	39.5%	2,201	49.4%	31.2%
Total	4,251	100.0%	4,452	100.0%	4.7%
HOMELESS HOUSEHOLDS					
Sheltered	1,545	48.4%	1,315	39.2%	-14.9%
Unsheltered	1,644	51.6%	2,039	60.8%	24.0%
Total	3,189	100.0%	3,354	100.0%	5.2%
HOMELESS SUBPOPULATIONS					
Chronically Homeless*	829		580		-30.0%
Veterans	446		447		0.2%
Severely Mentally Ill	480		475		-1.0%
Chronic Substance Abuse	986		458		-53.5%
Persons with HIV/AIDS	89		81		-9.0%
ANNUALIZED ESTIMATE					
Homeless Persons per Year	12,707		15,291		20.3%

Sources: Orange County Homeless 2015 PIT Report; Orange County Homeless County & Survey Report, July 2013

**Includes Chronically Homeless Individuals and Persons in Chronically Homeless Families*

E. Housing Profile

Housing Growth

Table 3-18 details the number and growth rate of the housing stock of the 16 cities, Orange County, and California between 2000 and 2015. In general, there was consistent positive growth on the 16 cities, county and state levels during both the 2000–2010 and 2010–2015 time periods. The sole exception is the City of Garden Grove, which decreased in number of housing units by one-tenth of one percent between 2010 and 2015. During the last five years, Tustin experienced the greatest rate of housing growth at 3.0 percent, larger than both the county rate of 2.0 percent and the state rate of 1.7 percent. Overall, the City of Lake Forest had the largest percentage increase in housing; Lake Forest's growth rate was 32.2 percent during the 2000s and 1.4 percent from 2010 to 2015, totaling 34.0 percent housing growth during the 15-year period. The only other cities to experience double-digit growth for the same time period were San Clemente (26.5%) and Newport Beach (18.6%). In comparison, total housing units within Orange County increased by 10.3 percent and within California by 13.9 percent between 2000 and 2015. The City of Garden Grove had the lowest overall housing growth rate, with a 2.2 percent increase between 2000 and 2015, followed by La Habra (3.2%), Buena Park (3.8%), and Santa Ana (3.9%).

Table 3-18: Housing Growth 2000-2015

City/Area	2000	2010	2015	% Change 2000-2010	% Change 2010-2015
Anaheim	99,719	104,237	106,407	4.5%	2.1%
Buena Park	23,826	24,623	24,726	3.3%	0.4%
Costa Mesa	40,406	42,120	42,592	4.2%	1.1%
Fountain Valley	18,473	19,164	19,303	3.7%	0.7%
Fullerton	44,771	47,869	48,474	6.9%	1.3%
Garden Grove	46,703	47,755	47,727	2.3%	-0.1%
Huntington Beach	75,662	78,003	79,896	3.1%	2.4%
La Habra	19,441	19,924	20,060	2.5%	0.7%
Lake Forest	20,486	27,088	27,454	32.2%	1.4%
Mission Viejo	32,985	34,228	34,619	3.8%	1.1%
Newport Beach	37,288	44,193	44,211	18.5%	0.0%
Orange	41,920	45,111	45,267	7.6%	0.3%
Rancho Santa Margarita	16,515	17,260	17,309	4.5%	0.3%
San Clemente	20,653	25,966	26,116	25.7%	0.6%
Santa Ana	74,588	76,896	77,477	3.1%	0.8%
Tustin	25,501	26,476	27,262	3.8%	3.0%
Orange County	969,484	1,048,907	1,069,450	8.2%	2.0%
California	12,214,550	13,680,081	13,914,715	12.0%	1.7%

Sources: 2010 Census; Dept of Finance E-5 estimates, January 2015

Housing Type

The majority of Orange County's housing stock is comprised of single-family dwelling units. According to the California Department of Finance 2015 estimates, which are presented in Table 3-19, 62.7 percent of the countywide housing stock is single-family units (detached and attached). Over one-third (34.2%) the housing stock is multi-family units (two dwelling units or more) and 3.1 percent are mobile homes. Of the 16 cities, Mission Viejo (83.7%), Fountain Valley (75.7%) and Rancho Santa Margarita (74.7%) have the highest percentage of single-family units in their housing stock. The city with the highest proportion of multi-family units is Tustin, which has slightly more multi-family units (48.9%) than single-family units (47.8%). Other cities with a high percentage of multi-family units include Costa Mesa (48.3%) and Anaheim (44.9%).

Table 3-19: Housing Stock by Type 2015

Cities	Single DU		Multiple DU		Mobile Homes
	Detached	Attached	2-4 Units	5+ Units	
Anaheim	42.2%	8.5%	10.7%	34.2%	4.4%
Buena Park	58.2%	7.3%	7.0%	26.0%	1.4%
Costa Mesa	39.4%	10.1%	13.4%	34.9%	2.2%
Fountain Valley	65.6%	10.1%	3.6%	18.7%	2.0%
Fullerton	50.3%	10.1%	8.4%	29.5%	1.8%
Garden Grove	57.2%	8.3%	8.8%	22.3%	3.4%
Huntington Beach	48.7%	11.6%	12.1%	23.7%	3.9%
La Habra	53.1%	7.5%	7.7%	27.2%	4.4%
Lake Forest	54.3%	15.1%	5.5%	20.5%	4.6%
Mission Viejo	71.4%	12.3%	2.6%	13.5%	0.1%
Newport Beach	45.6%	15.9%	11.6%	24.3%	2.7%
Orange	57.5%	10.7%	10.8%	18.2%	2.7%
Rancho Santa Margarita	54.0%	20.7%	3.6%	21.6%	0.1%
San Clemente	56.9%	10.0%	15.7%	15.1%	2.3%
Santa Ana	45.9%	7.3%	9.7%	31.8%	5.2%
Tustin	34.7%	13.1%	14.8%	34.1%	3.3%
Orange County	50.7%	12.0%	8.7%	25.5%	3.1%

Source: CA Dept of Finance E-5 estimates, January 2015

Age of Housing Stock

Over one-third of the existing housing stock in the county was constructed after 1980. This leaves approximately two-thirds of the homes over 35 years old. The median age of an Orange County home is 40 years. In general, homes built more than 30 years ago are likely to require structural renovation and increased maintenance, resulting in greater costs for the owner. Older homes can also create health and safety problems for occupants. Older, deteriorated structures often do not meet current building code standards and lack safety features such as fire suppression, home security devices and seismic safety retrofits. In fact, stringent seismic safety codes were not developed until after the 1971 Sylmar earthquake. After that event, many building codes were revised to ensure structures could withstand seismic activity of similar magnitude. Additionally, in 1978 the federal government prohibited the use of lead-based paint on residential property; therefore, homes built prior to 1979 have a potential risk of containing lead-based paint. Lead poisoning can cause learning disabilities, behavioral problems and even brain damage in children.[2]

As presented in Table 3-20 , the age of the housing stock varies across the 16 cities. Among the 16 cities, Buena Park's housing stock is the oldest, with the median year of home construction in 1962. This is followed by the Cities of Garden Grove (1964), La Habra (1967) and Santa Ana (1967). The city with newest homes is Rancho Santa Margarita, with the median year of home construction in 1992. Other cities with newer residential construction include Lake Forest and San Clemente (both with 1981 as the median year of home construction). In San Clemente, 21.2 percent of its housing was constructed within the last 15 years.

Housing Cost and Affordability

Many housing problems are directly related to the cost of housing in a community. If housing costs are relatively high in comparison to household income, a correspondingly high prevalence of excessive housing cost burden and overcrowding occurs. This section evaluates the affordability of the housing stock in Orange County and the 16 cities accessible to low and moderate income households.

Housing Prices. The value of homes varies substantially among the 16 cities, because prices depend on the age, size and location of homes. As shown in Table 3-21, the average sales price of all homes in Orange County (single-family and condominiums) was $615,000 in September 2015. In comparison to the previous year (2014), the average sales price increased by approximately five percent. Among the 16 cities, the highest sales price in September 2015 was in the City of Newport Beach, with prices averaging almost $1.5 million. The second and third highest home sale prices among the 16 cities were in the Cities of San Clemente and Huntington Beach at $860,000 and $719,000, respectively.

Home sale prices in the $400,000 range include the Cities of Santa Ana ($445,000), Rancho Santa Margarita ($455,000), Buena Park ($462,500), La Habra ($470,000), Garden Grove ($475,000), and Anaheim ($485,000). An interesting fact is that the median age of Santa Ana's housing stock is 48

[2] *Executive Order 12898—Environmental Justice*

years old, while Rancho Santa Margarita has the youngest housing stock among the 16 cities at only 23 years. In general, home sale prices are lower in communities of older homes, such as the Cities of Buena Park, La Habra, and Garden Grove, where the median age of homes are about 50 years old.

Table 3-20: Housing Stock by Year Built, 2013

City/Area	Median Year Built	Before 1940	1940-1959	1960-1979	1980-1999	2000 or later
Anaheim	1972	2.6%	24.7%	43.2%	22.5%	7.0%
Buena Park	1962	2.4%	43.9%	36.3%	12.4%	5.1%
Costa Mesa	1969	1.6%	24.9%	50.2%	17.3%	6.1%
Fountain Valley	1972	0.5%	2.4%	78.5%	13.1%	5.5%
Fullerton	1969	5.5%	26.1%	44.2%	15.6%	8.7%
Garden Grove	1964	1.8%	38.7%	40.7%	14.1%	4.6%
Huntington Beach	1972	1.6%	6.6%	67.5%	19.4%	4.9%
La Habra	1967	2.2%	30.6%	48.4%	15.0%	3.9%
Lake Forest	1981	0.2%	1.7%	44.2%	51.6%	2.3%
Mission Viejo	1979	0.4%	0.8%	51.9%	43.1%	3.8%
Newport Beach	1974	3.8%	18.4%	41.3%	24.4%	12.1%
Orange	1972	5.3%	15.6%	47.6%	23.1%	8.5%
Rancho Santa Margarita	1992	0.2%	0.5%	3.3%	90.7%	5.3%
San Clemente	1981	2.0%	11.8%	34.8%	30.2%	21.2%
Santa Ana	1967	7.3%	27.0%	46.6%	15.4%	3.6%
Tustin	1979	1.8%	4.9%	46.4%	36.4%	10.5%
Orange County	1975	2.6%	15.7%	44.8%	27.2%	9.3%
California	1974	9.5%	20.4%	32.0%	26.0%	11.8%

Source: ACS 2009-2013 5Yr Est. Tables B25034 and B25035

Rental Rates. Table 3-21 also shows the average monthly rents of all rental units. According to information from RealFact.com, rental units in Orange County are renting, on average, at $1,848 per month. Average monthly rental rates by cities was available from another source, Realtor.com. The rental rate data shows that monthly rents range from $1,800 in the City of Garden Grove to as high as $4,800 in the City of Newport Beach. A recent article in the Orange County Register states that an improving job market and ongoing barriers to home-buying are driving up apartment rents in Orange County at the fastest pace in eight years. According to the article, the countywide average monthly rental rate of $1,848 is an all-time high, and 6.9 percent more than a year ago. As a result

of a low inventory of rental units and high demand, vacancy rates are very low -- 5.3 percent according to 2015 DOF estimates -- thus, owners can raise rents. According to the Orange County Register, New York had the nation's highest apartment rent at $3,374 a month and San Francisco was second, averaging $2,392 a month. Los Angeles County's average rent is $1,552 a month, with the Inland Empire's average rent at $1,159.

Table 3-21: Cost of Housing, 2015

City/Area	Homes Sold[1]	Average Sales Price of All Homes[1]	Average Monthly Rental Rates[2]
Anaheim	250	$485,000	$1,900
Buena Park	53	$462,500	$2,200
Costa Mesa	93	$700,000	$2,300
Fountain Valley	53	$687,500	$1,900
Fullerton	124	$507,000	$2,300
Garden Grove	111	$475,000	$1,800
Huntington Beach	231	$719,000	$2,500
La Habra	64	$470,000	$1,900
Lake Forest	98	$650,000	$2,600
Mission Viejo	125	$605,000	$2,800
Newport Beach	102	$1,475,000	$4,800
Orange	130	$566,000	$2,300
Rancho Santa Margarita	64	$455,000	$2,200
San Clemente	73	$860,000	$3,200
Santa Ana	167	$445,000	$2,000
Tustin	74	$572,500	$2,500
Orange County	3,193	$615,000	$1,800[3]

Source:
[1] *RealtyTrack and CorelLogic, September 2015. Includes average of single family and condominium units*
[2] *Realtor.com, December 2015*
[3] *RealFacts, Spring 2015*

Affordability. Based on federal and state guidelines that households should not spend more than 30 percent of their gross income on housing, Table 3-22 estimates the maximum housing costs affordable to Extremely Low Income, Very Low Income, Low Income, and Moderate Income households in Orange County. The affordability threshold is based upon the four-person household.

Using updated income guidelines, current housing affordability in terms of home ownership can be estimated for the various income groups. According to the State Income Limits for 2015, the Area Median Income (AMI) for a family of four in Orange County is $87,200. The income limit for an Extremely Low Income household (0-30% AMI) is $28,900, a Very Low Income household (31-50% AMI) is $48,150, a Low Income household (51-80% AMI) is $77,050, and Moderate Income (81-120% AMI) is $104,650.

Assuming that the potential homebuyer for each income group has sufficient down payment, credit, and maintains housing expenses no greater than 30 percent of their income, the maximum affordable home prices can be calculated. Table 3-22 presents maximum affordability purchase prices and rents. Previous Table 3-21 is compared with information in Table 3-22, and it appears that:

- Extremely Low, Very Low, and Low Income households cannot afford housing (rental or ownership) of adequate size in any of the 16 cities -- in particular, Extremely Low and Very Low Income households.
- On average, even Moderate Income households would find it difficult to purchase a home that costs more than $475,200. Based on the average sales price of homes presented in previous Table 3-22, Moderate Income households would have been able to purchase a home in 2015 in the cities of Buena Park, Garden Grove, La Habra, Rancho Santa Margarita, and Santa Ana.

Table 3-22: Maximum Affordable Housing Prices and Rents by Income Groups 2015

Income Category	Income Limit	Max. Home Purchase Price	Max. Home Rental Rate
Area Median Income (4-Persons): $87,200			
Extremely Low Income (0-30% AMI)	$28,900	$116,600	$504
Very Low Income (31%- 50% AMI)	$48,150	$195,900	$890
Lower Income (51-%- 80% AMI)	$77,050	$315,500	$1,494
Moderate Income (101-120% AMI)	$104,650	$475,200	$2,316

Calculation of affordable rent is based on 30% of gross household income. Calculation of affordable home purchase is based on down payment of 10%, annual interest rate of 4.00%, 30-year fixed mortgage, utilities of $150 (ELI), $200 (VLI), $250 (LI), $300 (MI), and tax/insurance of 20% of housing expense.

Future Housing Needs

Article 10.6 of the Government Code Section 65580-65590 requires all California localities to adopt a Housing Element as part of their General Plan. State Housing Element Law requires that cities and counties develop local housing programs to meet its "fair share" of existing and future housing needs for all income groups. The Southern California Association of Governments (SCAG), through the fifth-cycle of the Regional Housing Needs Assessment (RHNA), allocated the regional fair share of housing

needs to all cities within the five county region (Imperial, Los Angeles, Orange, San Bernardino, and Ventura Counties) for the 2014-2021 period. Each city is required to implement housing programs through it Housing Element to accommodate the level of housing growth identified in the RHNA by household income categories.

Table 3-23 presents the distribution of the future housing needs for each of the 16 cities by four household income categories. As presented in the table, the City of Anaheim has the largest number of housing needs (5,702 units) during the 2014-2021 period, with the second largest need in the City of Lake Forest (2,727 units). On the other hand, the cities with the fewest number of future housing needs during the 2014-2021 period are the Cities of Costa Mesa and Rancho Santa Margarita, each with two units, followed by La Habra (4 units) and Newport Beach (5 units). With the exception of the Cities of Fullerton and San Clemente, each of the 16 cities have adopted Housing Elements which were certified by the State Department of Housing and Community Development (HCD). More details on the Housing Elements are discussed in Chapter 5: Public Policies and Practices.

Table 3-23: Future Housing Needs by Income Level, 2014-2021

Cities/County	Total Housing Units	Income Categories			
		% Very Low	% Low	% Moderate	% Above Moderate
Anaheim	5,702	22.0%	15.9%	18.2%	43.9%
Buena Park	339	22.4%	15.6%	18.3%	43.7%
Costa Mesa	2	50.0%	50.0%	0.0%	0.0%
Fountain Valley	358	23.2%	16.5%	18.2%	42.2%
Fullerton	1,841	22.3%	16.2%	18.3%	43.1%
Garden Grove	747	22.0%	16.1%	18.1%	43.9%
Huntington Beach	1,353	23.1%	16.3%	18.3%	42.3%
La Habra	4	25.0%	25.0%	25.0%	25.0%
Lake Forest	2,727	23.7%	16.5%	18.2%	41.5%
Mission Viejo	177	23.7%	16.4%	18.6%	41.2%
Newport Beach	5	20.0%	20.0%	20.0%	40.0%
Orange	363	22.9%	16.3%	18.2%	42.7%
Rancho Santa Margarita	2	50.0%	50.0%	0.0%	0.0%
San Clemente	581	23.1%	16.4%	18.6%	42.0%
Santa Ana	204	22.1%	15.7%	18.1%	44.1%
Tustin	1,227	23.1%	15.9%	18.3%	42.8%

Source: SCAG RHNA Final Allocation Plan 2014-2021

F. Housing Issues Profile

Overpayment

According to HUD standards, a household is considered "cost-burdened" or overpaying for housing if housing costs (rent plus utilities) make up more than 30 percent of the household's income. Households are "severely cost burdened" or severely overpaying if they spend more than 50 percent of their income on housing costs. A major consequence of overpayment is that less income is available to satisfy other critical household needs, such as transportation, medical and education.

According to Table 3-24, overpayment (greater than 30% of income) for housing occurred in 44.5 percent of total households in 2012, and severe overpayment (greater than 50% of income) occurred in 21.2 percent of total households. Additionally, the incidence of overpayment was higher for renters than owners, with 52.0 percent of renter households and 39.3 percent of owner households spending more than 30 percent of their income on housing costs.

Table 3-24: Overpayment by Tenure 2012

City/County	Overpayment (Cost Burden > 30%)			Severe Overpayment (Cost Burden > 50%)		
	Owner	Renter	Total	Owner	Renter	Total
Anaheim	41.5%	59.1%	50.6%	19.0%	31.3%	25.2%
Buena Park	40.4%	54.8%	46.6%	14.8%	27.4%	20.1%
Costa Mesa	40.7%	50.6%	46.5%	20.6%	24.1%	22.7%
Fountain Valley	34.7%	53.2%	39.9%	16.9%	28.6%	20.2%
Fullerton	36.9%	53.1%	44.4%	15.8%	29.3%	22.0%
Garden Grove	38.5%	55.8%	46.1%	17.5%	29.9%	22.9%
Huntington Beach	37.3%	47.0%	41.2%	15.4%	24.3%	18.9%
La Habra	40.2%	57.5%	48.0%	14.1%	19.0%	15.5%
Lake Forest	37.1%	45.0%	39.4%	14.0%	19.0%	15.5%
Mission Viejo	36.0%	55.4%	40.4%	15.2%	28.0%	18.0%
Newport Beach	39.6%	42.2%	40.7%	22.3%	23.4%	22.8%
Orange	39.6%	51.8%	44.4%	16.7%	26.0	20.3%
Rancho Santa Margarita	42.4%	51.1%	45.0%	15.0%	22.3%	17.1%
San Clemente	44.6%	50.7%	46.7%	21.9%	28.7%	24.3%
Santa Ana	42.8%	55.3%	49.4%	20.5%	28.4%	24.7%
Tustin	43.6%	55.3%	49.3%	17.5%	26.6%	21.9%
Orange County	39.3%	52.0%	44.5%	17.5%	26.6%	21.2%

Source: CHAS Data 2012

The rate of overpayment varied across jurisdictions, with over one-half (50.6%) of the total households in Anaheim overpaying, compared to 39.4 percent of Lake Forest households overpaying. Anaheim also had one-quarter (25.2%) of its households paying over 50 percent of their income on housing -- the highest percentage of severe overpayment among the 16 cities. In all cases, renter households were uniformly more likely to be cost burdened than owner households throughout the 16 cities. The incidence of overpayment among renter households was highest in the Cities of Anaheim and La Habra, where 59.1 percent and 57.5 percent of households were cost burdened, respectively. Among owner households, the highest percentage of overpaying occurred in the Cities of San Clemente (44.6%) and Tustin (43.6%).

Overcrowding

A lack of affordable housing can result in overcrowded households. As defined by HUD, overcrowding occurs when there is more than one person per room (excluding kitchens, bathrooms and hallways). Occupancy by more than 1.5 persons per room is considered severe overcrowding.

Table 3-25 shows the overcrowding rate among renters and owners in the 16 cities and Orange County in 2013. As shown in the table, 9.3 percent of all households countywide were overcrowded. Overcrowding was substantially higher among renters than owners, with 16.8 percent of renters and 4.0 percent of owner households living in overcrowded conditions.

The prevalence of overcrowding varied among the 16 cities. In the City of Santa Ana, almost one-third (32.5%) of the households lived in overcrowded conditions, significantly higher than the 9.3 percent overcrowding countywide. This was followed by La Habra with 19.1 percent of households living in overcrowded condition. The lowest percentage of overcrowding occurred in Newport Beach, where only 1.2 percent of household lived in overcrowding conditions. It should be noted that Newport Beach also has the lowest household size among the 16 cities at 2.24 persons per household. In all cases, rental overcrowding was significantly higher than owner occupied housing. Overcrowding was particularly high among renter households in Santa Ana and La Habra, where 42.6 percent and 33.1 percent of households were overcrowded, respectively.

This indicates the need for larger rental units and/or rental subsidies to allow large households to afford adequately sized units. Conditions of overcrowding are largely a combination of the lack of large rental units and the inability of most large renter households to afford larger units and lack of available adequately-sized rental units, as larger housing units tend to be more common in the homeownership market.

Table 3-25
Overcrowding by Tenure 2013
Percentage of Total Households

City/Area	Overcrowded (1.01+ PPR)			Severely Overcrowded (1.51+ PPR)		
	Owner	Renter	Total	Owner	Renter	Total
Anaheim	8.1%	26.2%	17.6%	1.7%	10.5%	6.3%
Buena Park	4.1%	21.3%	11.7%	0.4%	6.7%	3.2%
Costa Mesa	1.8%	12.0%	7.9%	0.3%	4.1%	2.6%
Fountain Valley	1.8%	6.5%	3.1%	0.2%	0.8%	0.4%
Fullerton	3.2%	17.5%	9.7%	1.0%	7.0%	3.8%
Garden Grove	10.5%	23.4%	16.2%	2.5%	8.4%	5.1%
Huntington Beach	0.5%	6.1%	2.8%	0.1%	2.0%	0.9%
La Habra	7.8%	33.1%	19.1%	2.6%	21.1%	10.9%
Lake Forest	1.0%	12.5%	4.5%	0.3%	3.7%	1.3%
Mission Viejo	1.1%	9.3%	2.8%	0.4%	1.2%	0.5%
Newport Beach	0.5%	2.0%	1.2%	0.1%	1.0%	0.5%
Orange	3.2%	21.0%	10.4%	0.6%	8.0%	3.6%
Rancho Santa Margarita	0.9%	9.3%	3.3%	0.2%	2.8%	0.9%
San Clemente	0.9%	8.3%	3.4%	0.1%	4.5%	1.6%
Santa Ana	20.7%	42.6%	32.5%	7.1%	22.3%	15.3%
Tustin	4.1%	16.1%	10.0%	1.3%	4.4%	2.8%
Orange County	4.0%	16.8%	9.3%	1.1%	6.9%	3.5%

Source: ACS 2009-2013 5Yr Est. Table B25014

G. Public and Assisted Housing

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

Section 8 Rental Assistance Housing Program

The Section 8 Housing Choice Voucher Program provides rental subsidies to low-income families that spend more than 30 percent of their gross income on housing costs. The program pays the

difference between 30 percent of the recipients' monthly income and the federally approved payment standard. Recipients of Section 8 vouchers are able to find their own housing, including single-family homes, townhouses and apartments. Under this program, owners are given favorable tax treatment provided that they preserve the units at rents that are affordable to low-income households.

Within the 16 cities participating in the regional AI, there are four housing authorities that administer the Housing Choice Voucher Program: Orange County Housing Authority (OCHA), Anaheim Housing Authority (AHA), Garden Grove Housing Authority (GGHA), and the Santa Ana Housing Authority (SAHA).

Orange County Housing Authority. Within the 16 cities, the Orange County Housing Authority, as of October 2015, assists 6,263 households through the Section 8 Housing Choice Voucher Program. The total includes 774 households who have moved to Orange County through portability (housing vouchers issued by another housing authority, but administered by OCHA), and 852 households that are assisted by OCHA but live in the Cities of Garden Grove or Anaheim, which have their own housing authorities. As of October 2015, approximately 46,000 households are on the OCHA waiting list for the program.

As presented in Table 3-26, of the 16 cities, the OCHA administers the largest number of Section 8 vouchers to the City of Huntington Beach, with 926 households (15%). This is followed by the City of Costa Mesa with 607 households (10%). The racial/ethnic characteristics of recipients include 40 percent non-Hispanic Whites, 27 percent non-Hispanic Asians, 22 percent Hispanic and 10 percent non-Hispanic Black/African American. As previously shown in this chapter, the non-Hispanic White population represents 44 percent of the countywide total in 2013. The Hispanic population represented 34 percent, non-Hispanic Asian 19 percent and non-Hispanic Black less than two percent. When comparing the elderly and disabled recipients of Section 8 vouchers, 43 percent of the households include at least one elderly person, and 40 percent are disabled head of households.

Anaheim Housing Authority. According to the Anaheim Housing Authority, as of February 2016, there are 6,162 Section 8 Housing Voucher and Project-Based Voucher recipients. Of the total recipients, 35 percent are Hispanic, 28 percent are non-Hispanic Asian/Pacific Islander, 28 percent are non-Hispanic White, eight percent are non-Hispanic Black/African American, and less than one percent are Native American. Also, 42 percent of the total recipients are elderly and 37 percent are disabled. In addition, there are 31,033 households on the waiting list to participate in Section 8 and Project-Based Voucher programs and 12,893 households in the Affordable Housing program. Of those on the waiting list to participate in the Section 8 and Project-Based programs, 33 percent are Hispanic, 26 percent are non-Hispanic Black/African American, 21 percent are non-Hispanic Asian/Pacific Islander, 19 percent non-Hispanic White, and one percent non-Hispanic Native American. The waiting list for the Affordable Housing programs includes 48 percent Hispanic, 21 percent non-Hispanic White, 19 percent non-Hispanic Asian/Pacific Islander, nine percent non-Hispanic Black/African American, , and one percent Native American.

Table 3-26: Orange County Housing Authority
Section 8 Program Recipients by City

City/Area	Vouchers	N-H White	Hispanic	N-H Asian	N-H Black	Other	Elderly	Disabled
Anaheim	385	123	99	98	60	5	136	173
Buena Park	464	115	156	51	140	2	149	163
Costa Mesa	607	366	107	113	13	5	235	220
Fountain Valley	480	111	34	334	4	4	335	187
Fullerton	590	242	194	71	76	7	207	238
Garden Grove	575	43	38	471	11	8	279	160
Huntington Beach	926	426	151	301	41	7	452	364
La Habra	187	49	113	9	15	1	66	80
Lake Forest	239	141	46	17	34	1	82	119
Mission Viejo	264	187	28	17	30	2	117	150
Newport Beach	144	99	20	7	15	2	69	52
Orange	598	220	189	137	46	6	264	254
Rancho Santa Margarita	145	84	27	8	24	2	66	70
San Clemente	136	102	24	4	5	1	84	69
Santa Ana	6	1	2	0	2	1	0	3
Tustin	517	190	184	58	82	3	177	191
Total	6,263	2,499	1,412	1,696	598	57	2,718	2,493
Percent of Total		39.9%	22.5%	27.1%	9.5%	0.9%	43.4%	39.8%

Source: Housing Authority of Orange County as of October 2015

Garden Grove Housing Authority. According to information provided by the Garden Grove Housing Authority (GGHA) in November 2015, there are approximately 2,300 Section 8 Program participants in Garden Grove. The largest racial/ethnic group participating in the program are non-Hispanic Asian residents, which represents 80 percent of the total recipients. Hispanic families account of 11 percent, non-Hispanic White 16 percent and non-Hispanic Black/African American one percent. Approximately 56 percent of the total Section 8 participants are elderly and 33 percent are disabled. There were approximately 16,000 households on the current waiting list for the GGHA Section 8 Program, and of those, Asians account for over one-half (56%), while Hispanic residents account for 19 percent. Also, over one-half (56%) of residents on the waiting list are the elderly and one-third (33%) are persons with disabilities.

Santa Ana Housing Authority. According to information provided by the Santa Ana Housing Authority (SAHA) in December 2015, there are 1,761 recipients participating in the Section 8 Voucher Program. Of the Section 8 recipients, over one-half (53%) are non-Hispanic Asian residents, followed by approximately one-third (34%) Hispanic residents. Non-Hispanic Whites account for nine percent and non-Hispanic Black/African Americans account for three percent. Additionally, elderly recipients represent one-half (50.5%) of the total and persons with disabilities account for 41 percent. According to SAHA, there are 5,128 residents on the current Section 8 Voucher waiting list. Hispanic and non-Hispanic Asian residents together account for three-quarters of the total residents on the waiting list, with Hispanics at 46 percent and non-Hispanic Asians at 31 percent. Waiting list residents that are elderly or disabled represent 18 percent and 16 percent, respectively.

H. Residential Care Facilities

Individuals with special needs, including the elderly or persons with physical or mental disabilities, need access to suitable housing in their community. This segment of the population often needs affordable housing that is located near public transportation, social and health services, and shopping. Persons with disabilities may require units equipped with wheelchair accessibility or other special features that accommodate physical or sensory limitations. Depending on the severity of the disability and support program regulations and reimbursement levels, people may live independently with some assistance in their own homes, in assisted living, or other special care facilities.

Table 3-27 shows the number of licensed community care facilities in the each of the 16 cities. In total, there are 2,105 licensed community care facilities, with 1,011 facilities serving adults, elderly and persons with disabilities (including children) that are located in the 16 cities. The licensed care facilities for the special needs residents are defined as follows by the California Department of Social Services, Community Care Licensing Division:

- **Adult Residential Facilities (ARF)** provide 24-hour non-medical care for adults ages 18 years through 59 years old who are unable to provide for their own daily needs. ARFs include board and care homes for adults with developmental disabilities and mental illnesses.
- **Residential Care Facilities for the Elderly (RCFE)** provide care, supervision, and assistance with daily living activities, such as bathing and grooming. In California, “elderly” is considered age 60 and above.
- **Adult Day Care** facilities provide care to persons 18 years of age or older in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of these individuals on less than a 24-hour basis.
- **Children's Residential Group Homes** provide 24-hour non-medical care and supervision to children. Services include social, psychological, and behavioral programs for troubled youth.
- **Small Family Homes (SFH)** provide 24-hour care in the licensee’s family residence for six or fewer children who require special supervision as a result of a mental or developmental disability or physical handicap.

In addition to the residential care facilities described above, there are a wide variety of programs to assist special needs populations and homeless individuals and families, who are homeless or at risk of homelessness. Many programs also target specific groups such as youth, veterans, or persons with HIV/AIDS.

Table 3-27: Licensed Community Care Facilities

City/Area	Adult Resid. Facilities	Asst. Living Resid. Care Facilities for the Elderly	Adult Day Care	Children's Residential Group Homes	Small Family Homes
Anaheim	96	97	8	2	0
Buena Park	29	26	1	3	0
Costa Mesa	9	42	1	9	2
Fountain Valley	2	42	1	2	1
Fullerton	11	38	2	6	0
Garden Grove	33	41	1	3	0
Huntington Beach	1	54	1	1	4
La Habra	1	16	0	0	0
Lake Forest	7	40	0	0	0
Mission Viejo	9	147	2	0	1
Newport Beach	0	13	0	0	0
Orange	23	47	3	11	1
Rancho Santa Margarita	0	0	0	0	0
San Clemente	1	20	0	0	1
Santa Ana	34	27	1	7	0
Tustin	2	22	1	5	0
Total	**258**	**672**	**22**	**49**	**10**

Source: California Department of Social Services, Community Care Licensing Division
https://secure.dss.ca.gov/CareFacilitySearch/home/selecttype/

I. Accessibility to Public Transportation

Public transit is often the only travel option for lower income households. Public transit should link lower income households to major employment centers. A lack of relationship between public transit, job centers, and affordable housing may impede Fair Housing Choice because persons who depend on public transit will be limited in the choice of where they can live.

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

Public Transit - OCTA

The Orange County Transportation Authority (OCTA) was formed in 1991 and provides transportation services to commuters moving throughout 34 cities and unincorporated areas of Orange County. The use of bus transportation and regional intermodal connections reduces freeway traffic congestion, improves safety and efficiency on local roads, and provides transportation options to people with special needs. The OCTA administrative offices are located in the City of Orange and it maintains bus operations bases in the cities of Garden Grove and Santa Ana. First Transit, which contracts with OCTA to provide public transit services to about operates about one-third of OCTA's Fixed Routes out of the Anaheim and Irvine bases. MV Transportation operates OCTA's paratransit base for the authority's ACCESS service also in Irvine. In addition to bus services, OCTA provides light rail service (Metrolink). OCTA also operates the State Route 91 Freeway Express lanes.

Bus Service. OCTA operates approximately 77 bus routes in Orange County. Most of the bus riders are from lower income households. Tables 3-28 and 3-29 present the 2015 OCTA bus fares and a descriptions of various passes offered to riders.

The OCTA is proposing a service plan for 2016 that includes the elimination of several bus routes. The proposed changes will affect some of the 16 cities, which are mostly located along the coast and also in the southern section of Orange County. Some of the key, proposed bus routes or segments that are planned to be discontinued include:

- **Anaheim:** Eliminate a portion of bus line route 30 near the Metrolink station. Eliminate portion of bus line 167.
- **Buena Park**: Eliminate a portion of bus line route 21 from Graham and McFadden to Pacific Coast Highway.
- **Costa Mesa**: Eliminate bus lines 51 and 145 from Santa Ana to Costa Mesa. Eliminate bus lines 172 and 173 from Huntington Beach to Costa Mesa.

- **Fullerton**: Eliminate portion of express bus line 721 from Fullerton to Los Angeles.
- **Garden Grove**: Eliminate portions of bus line 56 from Garden Grove to Orange.
- **Huntington Beach**: Eliminate a portion of bus line 35 from Graham and McFadden to Pacific Coast Highway. Eliminate bus line 76 from Huntington Beach to Newport Beach. Eliminate bus lines 172 and 173 from Huntington Beach to Costa Mesa. Eliminate bus line 178 from Huntington Beach to Irvine. Eliminate portion of express bus line 701 from Harbor Gateway Transit Center to Union Station.
- **La Habra**: Eliminate bus line 20 from Imperial and Idaho to Lemon and Main.

Table 3-28: OCTA Bus Fare Structure 2015

Type of Fare	Cost	Description
Local Routes:		
Regular Fare – Local Route	$ 2.00	Customers 6 years and older
Senior Citizen – Local Route	$ 0.75	Customers 60 and older
ACCESS - Local Fare	$ 0.25	Customers with certified disability
Children	Free	Children 5 yrs and younger ride free when riding with paying passenger. Limit: Three kids per customer
Express Routes:		
Regular Fare	$ 6.00	Express Routes: 701, 721 and 794
Additional fare, combined with any valid OCTA bus pass	$ 4.00	Express Routes: 701, 721 and 794
Seniors (60 & Older), persons with disabilities and Medicare cardholders	$ 5.00	Express Routes: 701, 721 and 794
Additional fare, combined with any valid OCTA bus pass	$ 4.25	Express Routes: 701, 721 and 794
Regular Fare	$ 4.00	Express Routes: 757 and 758
Additional fare, combined with any valid OCTA bus pass	$ 2.00	Express Routes: 757 and 758
Seniors (60 & Older), persons with disabilities and Medicare cardholders	$ 3.50	Express Routes: 757 and 758
Additional fare, combined with any valid OCTA bus pass	$ 2.75	Express Routes: 757 and 758

Source: OCTA Web Site, December 2015

Table 3-29: OCTA Cost of Bus Passes 2015

Type of Fare	Cost	Description
Local Route Passes:		
Day Pass	$ 5.00	Only sold on board by coach operators
Day Pass-Seniors	$ 1.50	Seniors (60 and older), persons w/disabilities and Medicare
Pre-Paid Day Pass	$ 4.50	
Pre-Paid Day Pass-Seniors	$ 1.35	Seniors (60 and older), persons w/disabilities and Medicare
7-Day Pass	$ 25.00	
7-Day Pass-Seniors	$ 8.25	Seniors (60 and older), persons w/disabilities and Medicare
30-Day Pass	$ 69.00	
30-Day Pass-Youth	$ 69.00	Ages 6-18 only
30-Day Pass-Senior	$ 22.25	Seniors (60 and older), persons w/disabilities and Medicare
5 Rides Pass	$ 9.00	Valid for 5 rides, anytime. Valid for all ages.
Express Route Passes:		
Express 30-Day	$187.50	Unlimited use on all local routs plus 701, 721 and 794
Express Day Pass	$ 12.00	Only sold on board by coach operators, valid until 11:59 p.m.
Express Senior Day Pass	$ 10.00	Seniors (60 and older), persons w/disabilities and Medicare
OC Express 30-Day	$125.00	Unlimited use on all local routes plus 757 and 758
OC Express Day Pass	$ 8.00	Only sold on board by coach operators, valid until 11:59 p.m.
OC Express Senior Day Pass	$ 7.00	Seniors (60 and older), persons w/disabilities and Medicare
Other Passes:		
Summer Youth Pass	$ 20.00	Unlimited rides for 30 consecutive days between June 1 and Sep 30
30-Day College Pass	$ 46.00	Students “C-Pass” *
75-Day Quarter College Pass	$ 116.00	Students “C-Pass” *
120-Day Semester College Pass	$ 185.00	Students “C-Pass” *
CSUF – University Pass	$ 92.00	“U-Pass” cost for the four-month semester
UC Irvine – University Pass	$ 169.00	“U-Pass” cost for the academic year from July 1 to June 30
Chapman – University Pass	$ 25.00	Chapman provides a $25 per month subsidy for regular monthly passes to 28 persons. If there are more than 28 persons that want the subsidy, Chapman conducts a simple lottery to select 28 people that will receive the subsidy for that month.

** C-Pass is available to qualified students at these participating colleges: Career College of California (30-Day available), Cypress College, Fullerton College (30-Day available), Goldenwest College, Irvine Valley College, NOCCCD School of Continuation Education, Orange Coast College, Saddleback College (30-Day available), Santa Ana College (30-Day available), Santiago Canyon College, The Art Institute of California*

Source: OCTA Web Site, December 2015

- **Mission Viejo**: Eliminate portion of bus line 85 from Crown Valley and Alicia to Golden Lantern and Dana Point. Eliminate bus line 191 from Mission Viejo to San Clemente.
- **Newport Beach**: Eliminate bus line 76 from Huntington Beach to Newport Beach. Eliminate portion of bus line 71 from Yorba Linda to Newport Beach.
- **Orange**: Eliminate portions of bus line 56 from Garden Grove to Orange.
- **Rancho Santa Margarita**: Eliminate bus line 87 from Rancho Santa Margarita to Laguna Niguel.
- **San Clemente**: Eliminate bus line 191 from Mission Viejo to San Clemente. Eliminate bus line 193.
- **Santa Ana**: Eliminate bus lines 51 and 145 from Santa Ana to Costa Mesa. Eliminate express bus line 757.

Metrolink Service. Metrolink is a system of eight (8) lines that serve the counties of Ventura, Los Angeles, Orange, Riverside and San Bernardino. It is a network of stations that connect to major destinations and employment centers. In Orange County, OCTA's Metrolink rail service has three lines and 13 stations from Buena Park to San Clemente, of which 10 are located within one of the 16 participating cities. OCTA operates the following:

- **OC-Line:** The OC Line has stations in the following Orange County cities: Buena Park, Fullerton, Anaheim, Orange, Santa Ana, Tustin, Irvine, Laguna Niguel/Mission Viejo, San Juan Capistrano and San Clemente. This line ends in Oceanside.
- **91-Line:** The 91 line has stations in the following Orange County cities: Buena Park and Fullerton. This line ends in Riverside.
- **Inland Empire/Orange County (IEOC) Line**: The Inland Empire/Orange County (IEOC) Line has three stations in the following Orange County cities: Anaheim, Orange, Santa Ana, Tustin, Irvine, Laguna Niguel/Mission Viejo, San Juan Capistrano and San Clemente. This line ends in Oceanside..

Metrolink fares are based on trip length and it offers many different types of tickets. Seniors and persons with disabilities receive 50 percent off one-way and round-trip tickets and 25 percent off monthly and 7-day passes. Children ages five and under ride free with each fare-paying adult (limited to three children per adult). Fares, discounts and other related Metrolink items are listed below:

- **Non-refundable and non-replaceable:** Metrolink tickets are sold at ticket-vending machines on station platforms.
- **One-Way Ticket:** Valid for a single one-way trip between the origin and destination stations. One-way tickets are valid for three hours from time of purchase.
- **Round-Trip Ticket:** Valid for a round-trip on the same day between the origin and destination stations. Travel must begin within three hours from time of purchase and end that same day.

- **Advance Purchase Ticket:** One-way or round-trip tickets can be purchased up to one year in advance. Unlike a same-day travel ticket, an advance purchase ticket will not include a printed expiration time.
- **7-Day Pass:** Good for unlimited trips for seven consecutive days between a set origin and destination, the 7-Day Pass is priced at seven one-way trips. Discounts apply for senior/disabled/Medicare (25% off) and students (10% off). It may not be purchased in advance.
- **$10 Weekend Day Pass:** Available for purchase only on Saturday and Sunday, this pass is good for unlimited travel throughout the Metrolink system either Saturday or Sunday. The Weekend Day Pass is accepted for free transfers to connecting transit services, except Amtrak.
- **Monthly Pass:** Valid for unlimited travel between the origin and destination station during the calendar month printed on the pass. .
- **Metrolink and Amtrak Transfers:** Only OCTA buses that directly connect with Metrolink trains at or near rail stations will honor Metrolink tickets and passes.

The following discounts apply to Metrolink fares and passes:

- **Youth (Ages 6 to 18):** 25 percent off Monthly Pass, 7-Day Pass, One-Way and Round-Trip tickets
- **Child (Ages 5 and under):** Three children ride free with an adult using a valid ticket - each additional child pays youth fare.
- **Students:** 25 percent off Monthly Pass, 7-Day Pass, One-Way and Round-Trip tickets
- **Short Distance Fares — Starting January 1, 2016:** Metrolink is lowering short distance fares system-wide to $3 for adults/youth/students and only $1.50 for senior/disabled/Medicare riders for one-way tickets. The short distance fare is offered to encourage local travel on Metrolink and is good for one station to the next station on any line Metrolink serves.
- **Senior (Ages 65 and over):** 25 percent off Monthly Pass and 7-Day Pass and 50 percent off One-Way and Round-Trip tickets
- **Persons with Disabilities:** 25 percent off Monthly Pass and 7-Day Pass and 50 percent off One-Way and Round-Trip tickets. A Personal Care Attendant (PCA) is allowed to accompany a person with a disability without purchasing a ticket. The PCA must board and detrain with the person with a disability.
- **Active Military:** 10 percent off One-Way and Round-Trip tickets.

Public transit also provides a link between residents and employment centers. Appendix B includes maps illustrating the location of major employment centers within each city to public transit routes. According to the 2013 ACS data, approximately three percent of the Orange County workers age 16 and older use public transit as a means of transportation.

4. Mortgage Lending Practices

An essential aspect of fair housing choice is equal access to credit for the purchase or improvement of a home. In the past, fair lending practices were not always employed by financial institutions. Credit market distortions and other activities such as redlining – a practice whereby a lender provides unequal access to credit or unequal credit terms to a person because of their race, creed, color or national origin or other characteristic(s) of the residents of the area where the applicant resides or will reside - prevented some groups from equal access to credit.

The passage of the Community Reinvestment Act (CRA) in 1977 and the Home Mortgage Disclosure Act (HMDA) in 1979 was designed to improve access to credit for all members of the community. This section reviews the lending practices of financial institutions, and the access that minorities and all income groups have to home loans.

A. Lending Laws and Regulations

Community Reinvestment Act

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

Home Mortgage Disclosure Act

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

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

Conventional, Government-Backed Financing

Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. To assist lower and moderate income households that may have difficulty in obtaining home mortgage financing in the private market due to income and equity issues, several government agencies offer loan products that have below market rate interests and are insured ("backed") by the agencies. Sources of government-backed financing include loans insured by the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the Rural Housing Services/Farm Service Agency (RHA/FSA). Often government-backed loans are offered to the consumers through private lending institutions. Local programs such as first time homebuyer and rehabilitation programs are not subject to HMDA reporting requirements.

Financial Stability Act

The Financial Stability Act of 2009 established the Making Home Affordable Program, which assists eligible homeowners who can no longer afford their home with mortgage loan modifications and other options, including short sale or deed-in-lieu of foreclosure. The program is targeted toward homeowners facing foreclosure, who are unemployed, or who owe more on their mortgage than their home is worth. The Making Home Affordable Program includes several options for homeowners in need of assistance:

- **Home Affordable Modification Program:** This program reduces a homeowner's monthly mortgage payment to 31 percent of their verified gross (pre-tax) income to make their payments more affordable.
- **Second Lien Modification Program:** Program offers homeowners a way to lower payments on their second mortgage.
- **HARP 1.0:** The Home Affordable Refinance Program, also known as HARP, is a federal program of the United States, set up by the Federal Housing Finance Agency in March 2009 to help underwater and near-underwater homeowners refinance their mortgages. Program assists homeowners whose mortgages are current and held by the Federal National Mortgage Association (Fannie Mae) or the Federal Home Loan Mortgage Corporation (Freddie Mac) refinance into a more affordable mortgage. Over 900,000 people have benefited from this program. In an effort to enable more struggling homeowners to take advantage of the Home Affordable Refinance Program, the deadline to submit an application to the program has been extended to December 31, 2016.
- **HARP 2.0:** Many people who purchased their home with a down payment of less than 20% of the purchase price were required to have private mortgage insurance (PMI) a common practice with Freddie Mac or Fannie Mae loans. Having PMI attached to a loan made that loan easier to sell on the Wall Street secondary market as a "whole loan." PMI hedged the risk brought by the high loan-to-value ratio by offering insurance against foreclosure for whoever owned the "whole loan". Although HARP 2.0 allows homeowners with PMI to apply through the Making Home Affordable Refinance Program, many homeowners have faced

difficulty refinancing with their original lender. HARP requires the new loan to provide the same level of mortgage insurance coverage as the original loan. This can be difficult and time-consuming, especially in the case of lender-paid private mortgage insurance (LPMI). As a result, many lenders are reluctant to refinance a PMI mortgage. HARP 2.0 enables homeowners to go to any lender to refinance, so the mortgage holder is not stymied if the original bank is unwilling to pursue a HARP refinance. HARP 2.0 refinancing is allowed on all occupancy types: primary residence (owner-occupied), second home, or investment (rental) property. However, HARP 2.0 refinancing of investment properties by Fannie Mae and Freddie Mac has higher mortgage rates than for owner-occupied properties. According to HARP.gov, there are still 430,000 homes that could qualify for HARP 2.0. FHFA, the organization that oversees HARP, examined homes with loans originated before June 2009 and have little or no equity and meet other requirements. Despite current rates in the low four percent range, nearly half a million people are still holding onto their mortgages at five percent, six percent, or even higher.

- **HARP 3.0:** In 2012, President Barack Obama outlined a plan to give "every responsible homeowner the chance to save about $3,000 a year on their mortgage". The plan - sometimes referred to as “HARP 3 - has not yet passed. HARP 3 is expected to expand HARP's eligibility requirements to homeowners with non-Fannie Mae and non-Freddie Mac mortgages, including homeowners with jumbo mortgages and Alt-A mortgages, those whose original mortgages were stated income, stated asset, or both.
- **Unemployment Program:** Program provides eligible homeowners a forbearance period during which their monthly mortgage payments are reduced or suspended while they seek re-employment. The minimum forbearance period is three months, although a mortgage servicer may extend the term depending on applicable investor and regulatory guidelines.
- **Principal Reduction Program:** Offers homeowners who are underwater the opportunity to earn principal reductions over a three-year period by successfully making payments in accordance with their modified loan terms.
- **Home Affordable Foreclosure Alternatives Program (HAFA):** For homeowners who can no longer afford their homes, but do not want to go into foreclosure, HAFA offers homeowners, their mortgage servicers, and investors’ incentives for completing a short sale or deed-in-lieu of foreclosure. HAFA enables homeowners to transition to more affordable housing while being released from their mortgage debt. The program also includes a “cash for keys” component whereby a homeowner receives financial assistance to help with relocation costs in return for vacating their property in good condition.

Helping Families Save Their Homes Act

The Helping Families Save Their Homes Act was passed by Congress and signed by the President in May 2009 and expands the Making Home Affordable Program. This Act includes provisions to make mortgage assistance and foreclosure prevention services more accessible to homeowners and increases protections for renters living in foreclosed homes. It also establishes the right of a

homeowner to know who owns their mortgage and provides over two billion dollars in funds to address homelessness.

The Act targets underwater borrowers by easing restrictions on refinance and requiring principal write-downs to help these homeowners increase the equity in their homes. The new law also provides federally guaranteed Rural Housing loans and FHA loans as part of the Making Homes Affordable Program. In addition to expanding the Making Homes Affordable Program, the Act extends the temporary increase in deposit insurance, increases the borrowing authority of the FDIC and National Credit Union Administration (NCUA), and creates a Stabilization Fund to address problems in the corporate credit union sector. Under this bill, tenants also have the right to stay in their homes after foreclosure for 90 days or through the term of their lease. Prior to this bill, tenants were only guaranteed 60 days of notice before eviction and any current lease was considered terminated in the event of a foreclosure. This Act extends the 60-day notification period to 90 days and requires banks to honor any existing lease on a property in foreclosure.

On May 20, 2009, President Obama signed the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act into law reauthorizing HUD's Homeless Assistance programs. It was included as part of the Helping Families Save Their Homes Act of 2009. The HEARTH Act allows for the prevention of homelessness, rapid re-housing, consolidation of housing programs, and new homeless categories. In the eighteen months after the bill's signing, HUD must make regulations implementing this new McKinney program.

Fraud Enforcement and Recovery Act

The Fraud Enforcement and Recovery Act of 2009, or FERA, was enacted May 20, 2009. This federal law enhanced criminal enforcement of federal fraud laws, especially regarding financial institutions, mortgage fraud, and securities fraud or commodities fraud. FERA amends the definition of a financial institution to include private mortgage brokers and non-bank lenders that are not directly regulated or insured by the federal government, making them liable under federal bank fraud criminal statutes. The new law also makes it illegal to make a materially false statement or to willfully overvalue a property in order to manipulate the mortgage lending business. In addition, FERA includes provisions to protect funds expended under TARP and the Recovery Act and amends the Federal securities statutes to cover fraud schemes involving commodity futures and options. Additional funds were also made available under FERA to a number of enforcement agencies in order to investigate and prosecute fraud.

B. Overall Lending Patterns

Data and Methodology

The availability of financing affects a person's ability to purchase or improve a home. Under HMDA, lending institutions are required to disclose information on the disposition of loan applications by the income, gender, and race of the applicants. This applies to all loan applications for home purchases, improvements, and refinancing, whether financed at market rate or with government assistance.

HMDA data are submitted by lending institutions to the FFIEC. Certain data is available to the public via the FFIEC site either in raw data format or as pre-set printed reports. The analyses of HMDA data presented in this AI were conducted using data from Compliance Tech. Compliance Tech's Lending Patterns on-line database tool that analyzes lending records to produce reports on various aspects of mortgage lending was used in this report. HMDA data included in this report includes market share, approval rates, denial rates, low/moderate income lending, and high-cost lending, among other key lending aspects in the Orange County 16 City study area.

General Overview

A summary of all home purchase loan activities in each of the 16 cities and Orange County, including loans that went through the complete loan process, and loans approved and denied from 2008 to 2013 are found in Appendix C-1. Included is information on loan outcomes by race/ethnicity. In addition, Appendix C-2 lists denial rates of purchase loans by race by Census Tract in all 16 cities of the study area. In 2013, the cities that had the most loan applications – over 2,000 for the year – included Huntington Beach, Mission Viejo, Orange and Santa Ana. Anaheim had over 3,000 completed purchase home loans. The cities with fewer home loan completions – under 1,000 – included Buena Park, Fountain Valley and La Habra.

Home purchase loan denial rates varied somewhat by city and from the Orange County average. In 2013 the average home purchase loan denial rate was 15 percent in Orange County. Out of the 16 cities in the study area, the following had denial rates in 2013 less than the Orange County average: Rancho Santa Margarita (11%), Mission Viejo (12%), San Clemente (12%), Fullerton (13%), Huntington Beach (13%), Lake Forest (14%) and Orange (14%). Denial rates in La Habra and Newport Beach were at 15 percent, the County average. On the other hand, the cities with denial rates higher than the Orange County average included: Anaheim (16%), Costa Mesa (16%), Tustin (16%), Buena Park (18%), Fountain Valley (18%), Garden Grove (20%) and Santa Ana (20%).

Home loan denial rates have been declining since the peak of the financial crisis in 2008 when the Orange County denial rate was at 22 percent. Steadily, the denial rate has decreased and stabilized at 15 percent during the last three years. The same pattern occurred in most of the 16 cities.

Home Purchase Loans

Home purchase loans were reviewed in the Orange County 16 City study area in 2013, as listed in Table 4-1. The approved loans included all loans that were originated and applications approved but not accepted. These loans went through the complete underwriting process. Overall, 85 percent of purchase loans were approved in Orange County.

Table 4-1: Status of Home Purchase Loans 2013

City	Completed Loan Applications Total	Loans Approved		Loans Denied	
		Num.	%	Num.	%
Anaheim	3,655	3,064	84%	591	16%
Buena Park	796	653	82%	143	18%
Costa Mesa	1,471	1,242	84%	229	16%
Fountain Valley	640	528	83%	112	18%
Fullerton	1,741	1,521	87%	220	13%
Garden Grove	1,944	1,548	80%	396	20%
Huntington Beach	2,359	2,041	87%	318	13%
La Habra	948	807	85%	141	15%
Lake Forest	2,091	1,796	86%	295	14%
Mission Viejo	2,387	2,091	88%	296	12%
Newport Beach	2,011	1,716	85%	295	15%
Orange	2,355	2,025	86%	330	14%
Rancho Santa Margarita	1,641	1,456	89%	185	11%
San Clemente	1,301	1,142	88%	159	12%
Santa Ana	2,162	1,721	80%	441	20%
Tustin	1,281	1,076	84%	205	16%
OC County	**33,742**	**28,842**	**85%**	**4,900**	**15%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
Note: Approved loans include loans originated and applications approved but not accepted.
Denial Rate based on applications that went through complete underwriting process, and exlude applications withdrawn or files closed for incompleteness.

Refinancing Loans

Refinance home loans were also reviewed. (Please see Table 4-2.) Owners will usually refinance existing home loans for a number of reasons, including better interest rates, consolidating debts, changing from variable rate to fixed rate loans, or taking equity out of their homes for various reasons.

The majority of loan applications submitted by Orange County households in 2013 were for home refinancing – over 100,000 applications. Approximately 80 percent of refinance applications were approved and 20 percent were denied in 2013. The study area's 16 cities approval and denial rates were fairly comparable to the countywide figures.

Table 4-2: Status of Home Refinance Loans 2013

City	Completed Loan Applications Total	Loans Approved		Loans Denied	
		Num.	%	Num.	%
Anaheim	10,647	8,388	79%	2,259	21%
Buena Park	2,802	2,185	78%	617	22%
Costa Mesa	4,332	3,434	79%	898	21%
Fountain Valley	2,451	1,952	80%	499	20%
Fullerton	5,602	4,478	80%	1,124	20%
Garden Grove	6,115	4,721	77%	1,394	23%
Huntington Beach	8,117	6,626	82%	1,491	18%
La Habra	2,538	2,038	80%	500	20%
Lake Forest	4,111	3,343	81%	768	19%
Mission Viejo	7,324	6,022	82%	1,302	18%
Newport Beach	6,159	4,928	80%	1,231	20%
Orange	7,938	6,494	82%	1,444	18%
Rancho Santa Margarita	4,620	3,840	83%	780	17%
San Clemente	4,021	3,243	81%	778	19%
Santa Ana	6,704	5,055	75%	1,649	25%
Tustin	4,351	3,513	81%	838	19%
OC County	**100,947**	**81,026**	**80%**	**19,921**	**20%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
Note: Approved loans include loans originated and applications approved but not accepted.
Denial Rate based on applications that went through complete underwriting process, and exlude applications withdrawn or files closed for incompleteness.

Home Improvement Loans

Home improvement loans were also reviewed, and are shown in Table 4-3 below. These types of loans are used to make necessary repairs and maintenance or to expand the size of a home. Usually, home improvement loan applications have a higher rate of denial when compared to home purchase or refinance loans because adding debt may exceed an applicant's maximum level of debt per lender guidelines. Lowering equity is assessed as riskier by lenders and, for this reason, denial rates are higher in these types of loans. In 2013, 4,156 applications for home improvement loans were submitted by Orange County households. The overall approval rate for home improvement loans in 2013 was 74 percent while 26 percent of these applications were denied.

Table 4-3: Status of Home Improvement Loans 2013

City	Completed Loan Applications Total	Loans Approved		Loans Denied	
		Num.	%	Num.	%
Anaheim	447	307	69%	140	31%
Buena Park	132	97	73%	35	27%
Costa Mesa	169	120	71%	49	29%
Fountain Valley	118	90	76%	28	24%
Fullerton	239	171	72%	68	28%
Garden Grove	314	218	69%	96	31%
Huntington Beach	340	266	78%	74	22%
La Habra	126	83	66%	43	34%
Lake Forest	141	102	72%	39	28%
Mission Viejo	298	231	78%	67	22%
Newport Beach	213	171	80%	42	20%
Orange	343	259	76%	84	24%
Rancho Santa Margarita	199	143	72%	56	28%
San Clemente	155	124	80%	31	20%
Santa Ana	328	209	64%	119	36%
Tustin	172	129	75%	43	25%
OC County	**4,156**	**3,060**	**74%**	**1,096**	**26%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
Note: Approved loans include loans originated and applications approved but not accepted.
Denial Rate based on applications that went through complete underwriting process, and exlude applications withdrawn or files closed for incompleteness.

C. Lending Patterns by Race/Ethnicity and Income Level

The federal Fair Housing Act prohibits discrimination in mortgage lending based on race, color, national origin, religion, sex, familial status or handicap-disability. Thus, it is important to assess not just overall approval and denial rates for a city, but also whether or not these rates vary by other factors, such as race/ethnicity.

Loan Applications by Race

Completed home purchase loan applications were also analyzed by race in the Orange County 16 city study area and compared to the countwide loan approval/denial rates for the 2008-2013 period. (Please see Tables 4-4 and 4-5). These are the loans that went through the complete underwriting cycle, which ultimately either led to a loan or denial of loan. In summary, completed application loans by race countywide included:

- White (49 percent)
- Asian (28 percent)
- Hispanic (10 percent)
- Black (0.6 percent)

Since 2008, the White population has had a constant share of home loan applications in the County at figures ranging from 47 to 49 percent. Black application figures have decreased by about half, from 1.2 percent of all loans in 2008 to 0.6 in 2013. The Asian share of the completed home loan applications has increased countywide from 23 percent to 28 percent in 2013.

In several cities, the Asian share of home purchase loan applications has increased to over 30 percent, including Anaheim, Buena Park, Fountain Valley, Fullerton, Garden Grove, La Habra, Lake Forest and Santa Ana.

In contrast, Hispanics evidenced a significant decrease in mortgage loan applications over the past five years in Orange County. In 2008, Hispanics accounted for 16 percent of all home purchase loan applications, and this figure has steadily declined to 10 percent in 2013. All of the 16 cities in the study area have seen a drop in the number of completed Hispanic home purchase loan applications, including the cities with the largest Hispanic populations (Anaheim, Santa Ana and La Habra).

Table 4-4: Status of Home Purchase Loans by Applicant Race - 2013

	Total	White		Black		Hispanic		Asian		Native American		Hawaiian		Multi-Race		Unk.		NA	
Cities	#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Anaheim	3,655	1,336	36.55%	31	0.85%	722	19.75%	1,157	31.66%	4	0.11%	21	0.57%	11	0.30%	317	8.67%	56	1.53%
Buena Park	796	172	21.61%	6	0.75%	143	17.96%	381	47.86%	1	0.13%	8	1.01%	3	0.38%	64	8.04%	18	2.26%
Costa Mesa	1,471	897	60.98%	6	0.41%	90	6.12%	232	15.77%	-	0.00%	4	0.27%	6	0.41%	211	14.34%	25	1.70%
Fountain Valley	640	195	30.47%	4	0.63%	24	3.75%	364	56.88%	-	0.00%	4	0.63%	1	0.16%	48	7.50%	-	0.00%
Fullerton	1,741	553	31.76%	14	0.80%	254	14.59%	700	40.21%	3	0.17%	12	0.69%	6	0.34%	181	10.40%	18	1.03%
Garden Grove	1,944	417	21.45%	4	0.21%	257	13.22%	1,110	57.10%	-	0.00%	6	0.31%	7	0.36%	118	6.07%	25	1.29%
Huntington Beach	2,359	1,478	62.65%	10	0.42%	126	5.34%	446	18.91%	3	0.13%	9	0.38%	7	0.30%	260	11.02%	20	0.85%
La Habra	948	316	33.33%	10	1.05%	218	23.00%	315	33.23%	-	0.00%	7	0.74%	1	0.11%	73	7.70%	8	0.84%
Lake Forest	2,091	906	43.33%	9	0.43%	121	5.79%	814	38.93%	3	0.14%	24	1.15%	6	0.29%	205	9.80%	3	0.14%
Mission Viejo	2,387	1,625	68.08%	15	0.63%	133	5.57%	289	12.11%	4	0.17%	19	0.80%	6	0.25%	294	12.32%	2	0.08%
Newport Beach	2,011	1,257	62.51%	4	0.20%	36	1.79%	333	16.56%	4	0.20%	3	0.15%	6	0.30%	321	15.96%	47	2.34%
Orange	2,355	1,236	52.48%	14	0.59%	238	10.11%	589	25.01%	5	0.21%	16	0.68%	9	0.38%	234	9.94%	14	0.59%
Rancho Santa Margarita	1,641	1,113	67.82%	18	1.10%	111	6.76%	175	10.66%	2	0.12%	3	0.18%	8	0.49%	205	12.49%	6	0.37%
San Clemente	1,301	990	76.10%	4	0.31%	50	3.84%	61	4.69%	1	0.08%	7	0.54%	5	0.38%	175	13.45%	8	0.61%
Santa Ana	2,162	587	27.15%	7	0.32%	678	31.36%	670	30.99%	2	0.09%	6	0.28%	8	0.37%	176	8.14%	28	1.30%
Tustin	1,281	654	51.05%	5	0.39%	129	10.07%	329	25.68%	2	0.16%	7	0.55%	4	0.31%	143	11.16%	8	0.62%
Orange County Total	**33,742**	**16,526**	**48.98%**	**201**	**0.60%**	**3,258**	**9.66%**	**9,517**	**28.21%**	**41**	**0.12%**	**170**	**0.50%**	**123**	**0.36%**	**3,607**	**10.69%**	**299**	**0.89%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
1 - Includes conventional and government-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Denial rate based on applications that went through the complete underwriting process, and excludes applications withdrawn or files closed for incompleteness.

Table 4-5: Home Purchase Loans - Completed Loan Applications Percent of Total, 2008 to 2013

Cities	White						Black					
	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013
Anaheim	35%	34%	34%	35%	34%	37%	1.8%	1.0%	0.7%	1.0%	1.1%	0.8%
Buena Park	26%	27%	23%	28%	23%	22%	3.1%	1.9%	1.6%	1.7%	2.2%	0.8%
Costa Mesa	57%	62%	60%	60%	58%	61%	0.6%	0.6%	0.5%	0.7%	0.4%	0.4%
Fountain Valley	28%	26%	26%	26%	30%	30%	0.7%	0.4%	0.4%	0.3%	0.2%	0.6%
Fullerton	38%	33%	35%	36%	35%	32%	1.6%	1.0%	0.8%	0.9%	0.9%	0.8%
Garden Grove	21%	19%	19%	20%	18%	21%	1.1%	0.4%	0.4%	0.7%	0.9%	0.2%
Huntington Beach	63%	64%	62%	58%	61%	63%	0.6%	0.5%	0.6%	0.7%	0.4%	0.4%
La Habra	34%	34%	35%	35%	36%	33%	1.1%	1.3%	0.9%	1.8%	1.3%	1.1%
Lake Forest	58%	58%	49%	52%	47%	43%	1.2%	0.7%	0.7%	1.1%	1.3%	0.4%
Mission Viejo	67%	65%	64%	63%	66%	68%	1.1%	1.1%	1.0%	0.9%	0.8%	0.6%
Newport Beach	65%	67%	66%	65%	64%	63%	0.3%	0.3%	0.3%	0.5%	0.1%	0.2%
Orange	50%	46%	47%	51%	50%	52%	1.3%	0.6%	0.9%	0.9%	1.0%	0.6%
Rancho Santa Margarita	68%	68%	69%	67%	68%	68%	0.9%	1.5%	1.2%	1.3%	1.1%	1.1%
San Clemente	70%	72%	72%	75%	76%	76%	0.2%	0.3%	0.5%	0.1%	0.4%	0.3%
Santa Ana	26%	23%	23%	22%	23%	27%	0.9%	0.4%	0.9%	1.1%	0.6%	0.3%
Tustin	44%	39%	40%	42%	46%	51%	0.8%	0.5%	1.0%	1.2%	0.5%	0.4%
Orange County Total	**49%**	**47%**	**47%**	**48%**	**48%**	**49%**	**1.2%**	**0.8%**	**0.8%**	**0.9%**	**0.8%**	**0.6%**

Cities	Hispanic						Asian					
	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013
Anaheim	26%	23%	21%	23%	22%	20%	24%	30%	32%	28%	30%	32%
Buena Park	24%	21%	17%	20%	18%	18%	34%	40%	47%	39%	45%	48%
Costa Mesa	9%	6%	5%	6%	6%	6%	17%	18%	20%	16%	19%	16%
Fountain Valley	5%	7%	5%	6%	7%	4%	56%	57%	58%	56%	54%	57%
Fullerton	20%	20%	19%	20%	15%	15%	27%	34%	35%	31%	39%	40%
Garden Grove	16%	12%	13%	12%	10%	13%	54%	60%	58%	58%	61%	57%
Huntington Beach	6%	6%	5%	5%	5%	5%	17%	19%	20%	20%	20%	19%
La Habra	34%	31%	27%	31%	25%	23%	20%	23%	26%	21%	28%	33%
Lake Forest	13%	10%	9%	11%	7%	6%	12%	17%	29%	23%	32%	39%
Mission Viejo	9%	9%	7%	8%	8%	6%	8%	11%	12%	12%	12%	12%
Newport Beach	3%	2%	2%	3%	2%	2%	10%	11%	14%	10%	14%	17%
Orange	15%	14%	11%	12%	12%	10%	19%	25%	27%	22%	23%	25%
Rancho Santa Margarita	7%	6%	6%	7%	7%	7%	8%	11%	9%	11%	10%	11%
San Clemente	3%	5%	5%	4%	4%	4%	4%	4%	5%	4%	4%	5%
Santa Ana	40%	38%	37%	39%	36%	31%	23%	28%	29%	28%	30%	31%
Tustin	17%	15%	13%	12%	14%	10%	25%	32%	32%	32%	28%	26%
Orange County Total	**16%**	**14%**	**12%**	**13%**	**11%**	**10%**	**23%**	**25%**	**27%**	**25%**	**27%**	**28%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
1 - Includes conventional and govt-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Table includes all applications that went through the complete underwriting process, and excludes applications withdrawn or files closed for incompleteness.

Loan Applicant Representation

Ideally, the applicant pool for mortgage lending should be reflective of the demographics of a community. When one racial/ethnic group is overrepresented or underrepresented in the total applicant pool, it could be an indicator of unequal access to housing opportunities. Such a finding may be a sign that access to mortgage lending is not equal for all individuals. The percentage of loans completed in each city were compared to the percentage of the city's racial composition and presented in Tables 4-6, 4-7 and 4-8. All racial/ethnic categories have seen a decline in loan denial rates since the peak of the financial crisis in 2008. The following provides a summary of completed purchase loan applications by race compared to the composition of the 16 cities in the study area and County, is summarized below:

- **White.** Throughout Orange County, including most of the 16 cities in the study area, the White racial group has a similar percentage of loan applications completed compared to the racial composition of these cities. Whites made up 43 percent of the County in 2013, and 49 percent of the home purchase loan applications were completed by this racial group. Three cities had a difference of over 10 percent between the loan applications completed and percentage of this racial category. In Newport Beach, for example, Whites made up 82 percent of the population, yet in 2013, only 63 percent of the loans in Newport Beach were to Whites. Lake Forest and Fountain Valley also had fewer loans completed by Whites compared to the racial composition of these cities.
- **Hispanic.** Hispanics were severely underrepresented in the home loan market in Orange County – making up 34 percent of the County's population, compared to just 10 percent of the home purchase loan applications. The low percentage of loan applications by Hispanics relative to population figures was significant even in cities with large Hispanic populations. For example, Anaheim, which has a Hispanic population of 53 percent only had 20 percent of purchase loan applications being completed by Hispanics. La Habra, which is 60 percent Hispanic, only had 23 percent of the loan applications completed by Hispanics. And, Santa Ana – with 79 percent Hispanic population, the most in Orange County – had just 31 percent of loan applications completed by Hispanics. The relatively low loan figures could be due to various factors, such as, income, employment history, income-to debt ratio, and knowledge of the homebuyer process.
- **Asian.** In Orange County, 28 percent of the loan applications were completed by Asians, while this group comprised 18 percent of the population in 2013. The cities that have had recent significant increases – of over 20 percent in loan applications completed, compared to percentage of population – include the following: Buena Park, Fountain Valley, La Habra, Lake Forest and Santa Ana.
- **Black.** Blacks make up 1.5 percent of Orange County, and only 0.6 percent of the loan applications were completed by Blacks. Only two cities had purchase loan applications by Blacks over 1 percent: La Habra (1.1%) and Rancho Santa Margarita (1.1%). Out of the 16 cities in the study area, the one with the largest percentage of Blacks in 2013 was Buena Park with 4.3 percent of the population. However, only 0.8 percent of loan applications were completed by Blacks in this city.

Table 4-6: Home Purchase Loans - Comparison, Completed Loan Applications and Percent of City, 2013

Cities	White *				Black *			
	% Loans Completed	% of Population	Difference	Ratio	% Loans Completed	% of Population	Difference	Ratio
Anaheim	36.6%	27.4%	9.2%	1.33	0.8%	2.4%	-1.6%	0.35
Buena Park	21.6%	26.3%	-4.7%	0.82	0.8%	4.3%	-3.5%	0.18
Costa Mesa	61.0%	51.6%	9.4%	1.18	0.4%	1.2%	-0.8%	0.34
Fountain Valley	30.5%	46.6%	-16.1%	0.65	0.6%	1.2%	-0.6%	0.52
Fullerton	31.8%	36.1%	-4.3%	0.88	0.8%	2.5%	-1.7%	0.32
Garden Grove	21.5%	21.3%	0.2%	1.01	0.2%	1.0%	-0.8%	0.21
Huntington Beach	62.7%	66.1%	-3.4%	0.95	0.4%	0.7%	-0.3%	0.61
La Habra	33.3%	28.7%	4.6%	1.16	1.1%	1.6%	-0.5%	0.66
Lake Forest	43.3%	56.9%	-13.6%	0.76	0.4%	1.6%	-1.2%	0.27
Mission Viejo	68.1%	70.9%	-2.8%	0.96	0.6%	1.5%	-0.9%	0.42
Newport Beach	62.5%	81.6%	-19.1%	0.77	0.2%	0.6%	-0.4%	0.33
Orange	52.5%	45.9%	6.6%	1.14	0.6%	1.0%	-0.4%	0.59
Rancho Santa Margarita	67.8%	66.8%	1.0%	1.02	1.1%	1.1%	0.0%	1.00
San Clemente	76.1%	75.4%	0.7%	1.01	0.3%	0.7%	-0.4%	0.44
Santa Ana	27.2%	9.6%	17.6%	2.83	0.3%	1.1%	-0.8%	0.29
Tustin	51.1%	32.3%	18.8%	1.58	0.4%	2.3%	-1.9%	0.17
Orange County Total	**49.0%**	**43.5%**	**5.5%**	**1.13**	**0.6%**	**1.5%**	**-0.9%**	**0.40**

Cities	Hispanic				Asian *			
	% Loans Completed	% of Population	Difference	Ratio	% Loans Completed	% of Population	Difference	Ratio
Anaheim	19.8%	52.6%	-32.8%	0.38	31.7%	15.2%	16.5%	2.08
Buena Park	18.0%	38.5%	-20.5%	0.47	47.9%	27.9%	20.0%	1.72
Costa Mesa	6.1%	35.2%	-29.1%	0.17	15.8%	9.0%	6.8%	1.75
Fountain Valley	3.8%	15.8%	-12.1%	0.24	56.9%	33.7%	23.2%	1.69
Fullerton	14.6%	34.5%	-19.9%	0.42	40.2%	23.8%	16.4%	1.69
Garden Grove	13.2%	36.8%	-23.6%	0.36	57.1%	37.9%	19.2%	1.51
Huntington Beach	5.3%	18.7%	-13.4%	0.29	18.9%	11.0%	7.9%	1.72
La Habra	23.0%	60.3%	-37.3%	0.38	33.2%	7.4%	25.8%	4.49
Lake Forest	5.8%	23.5%	-17.7%	0.25	38.9%	14.1%	24.8%	2.76
Mission Viejo	5.6%	15.8%	-10.2%	0.35	12.1%	7.9%	4.2%	1.53
Newport Beach	1.8%	8.4%	-6.6%	0.21	16.6%	6.9%	9.7%	2.40
Orange	10.1%	38.4%	-28.3%	0.26	25.0%	12.6%	12.4%	1.98
Rancho Santa Margarita	6.8%	18.8%	-12.0%	0.36	10.7%	10.6%	0.1%	1.01
San Clemente	3.8%	17.5%	-13.7%	0.22	4.7%	3.4%	1.3%	1.38
Santa Ana	31.4%	78.5%	-47.1%	0.40	31.0%	9.9%	21.1%	3.13
Tustin	10.1%	39.4%	-29.3%	0.26	25.7%	22.7%	3.0%	1.13
Orange County Total	**9.7%**	**33.8%**	**-24.1%**	**0.29**	**28.2%**	**18.2%**	**10.0%**	**1.55**

* Non-Hispanic
Sources: www.lendingpatterns.com, October 2015, US Census, ACS 2009-2013 Table DPO5
Tabulations: GRC Associates, Inc., October 2015
1 - Includes conventional and govt-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Table includes all applications that went through the complete underwriting process, and excludes applications withdrawn or files closed for incompleteness.

Table 4-7: Denied by Race - Home Purchase Loans - 2013

Cities	Total			White			Black			Hispanic			Asian		
	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %
Anaheim	3,655	591	16.17%	1,336	172	12.87%	31	7	22.58%	722	155	21.47%	1,157	190	16.42%
Buena Park	796	143	17.96%	172	23	13.37%	6	1	16.67%	143	28	19.58%	381	78	20.47%
Costa Mesa	1,471	229	15.57%	897	127	14.16%	6	-	0.00%	90	18	20.00%	232	40	17.24%
Fountain Valley	640	112	17.50%	195	26	13.33%	4	-	0.00%	24	-	0.00%	364	78	21.43%
Fullerton	1,741	220	12.64%	553	56	10.13%	14	1	7.14%	254	35	13.78%	700	98	14.00%
Garden Grove	1,944	396	20.37%	417	55	13.19%	4	2	50.00%	257	50	19.46%	1,110	260	23.42%
Huntington Beach	2,359	318	13.48%	1,478	168	11.37%	10	-	0.00%	126	17	13.49%	446	86	19.28%
La Habra	948	141	14.87%	316	41	12.97%	10	1	10.00%	218	45	20.64%	315	37	11.75%
Lake Forest	2,091	295	14.11%	906	119	13.13%	9	-	0.00%	121	17	14.05%	814	116	14.25%
Mission Viejo	2,387	296	12.40%	1,625	183	11.26%	15	2	13.33%	133	16	12.03%	289	46	15.92%
Newport Beach	2,011	295	14.67%	1,257	184	14.64%	4	1	25.00%	36	4	11.11%	333	49	14.71%
Orange	2,355	330	14.01%	1,236	149	12.06%	14	8	57.14%	238	36	15.13%	589	89	15.11%
Rancho Santa Margarita	1,641	185	11.27%	1,113	115	10.33%	18	4	22.22%	111	12	10.81%	175	24	13.71%
San Clemente	1,301	159	12.22%	990	109	11.01%	4	-	0.00%	50	8	16.00%	61	11	18.03%
Santa Ana	2,162	441	20.40%	587	92	15.67%	7	2	28.57%	678	155	22.86%	670	148	22.09%
Tustin	1,281	205	16.00%	654	97	14.83%	5	-	0.00%	129	26	20.16%	329	44	13.37%
Orange County Total	**33,742**	**4,900**	**14.52%**	**16,526**	**2,036**	**12.32%**	**201**	**36**	**17.91%**	**3,258**	**607**	**18.63%**	**9,517**	**1,536**	**16.14%**

Cities	Native American			Hawaiian			Multi-Race			Unk.			NA		
	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %
Anaheim	4	1	25.00%	21	1	4.76%	11	4	36.36%	317	58	18.30%	56	3	5.36%
Buena Park	1	-	0.00%	8	1	12.50%	3	1	33.33%	64	11	17.19%	18	-	0.00%
Costa Mesa	-	-	-	4	1	25.00%	6	1	16.67%	211	42	19.91%	25	-	0.00%
Fountain Valley	-	-	-	4	-	0.00%	1	1	100.0%	48	7	14.58%	-	-	-
Fullerton	3	1	33.33%	12	2	16.67%	6	1	16.67%	181	25	13.81%	18	1	5.56%
Garden Grove	-	-	-	6	1	16.67%	7	1	14.29%	118	26	22.03%	25	1	4.00%
Huntington Beach	3	-	0.00%	9	3	33.33%	7	-	0.00%	260	43	16.54%	20	1	5.00%
La Habra	-	-	-	7	2	28.57%	1	-	0.00%	73	13	17.81%	8	2	25.00%
Lake Forest	3	-	0.00%	24	14	58.33%	6	2	33.33%	205	27	13.17%	3	-	0.00%
Mission Viejo	4	-	0.00%	19	6	31.58%	6	2	33.33%	294	41	13.95%	2	-	0.00%
Newport Beach	4	-	0.00%	3	1	33.33%	6	-	0.00%	321	52	16.20%	47	4	8.51%
Orange	5	2	40.00%	16	-	0.00%	9	4	44.44%	234	41	17.52%	14	1	7.14%
Rancho Santa Margarita	2	2	100.0%	3	-	0.00%	8	2	25.00%	205	26	12.68%	6	-	0.00%
San Clemente	1	1	100.0%	7	-	0.00%	5	-	0.00%	175	30	17.14%	8	-	0.00%
Santa Ana	2	2	100.0%	6	2	33.33%	8	2	25.00%	176	36	20.45%	28	2	7.14%
Tustin	2	-	0.00%	7	1	14.29%	4	1	25.00%	143	35	24.48%	8	1	12.50%
Orange County Total	**41**	**7**	**17.07%**	**170**	**30**	**17.65%**	**123**	**22**	**17.89%**	**3,607**	**609**	**16.88%**	**299**	**17**	**5.69%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
1 - Includes conventional and government-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Denial rate based on applications that went through the complete underwriting process, and excludes applications withdrawn or files closed for incompleteness.

Table 4-8: Home Purchase Loans - Denial Rate Percentages, 2008 to 2013

Cities	City Average						White						Black					
	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013
Anaheim	22%	19%	18%	16%	17%	16%	17%	14%	14%	13%	13%	13%	34%	17%	10%	17%	12%	23%
Buena Park	20%	17%	16%	13%	13%	18%	16%	13%	17%	11%	5%	13%	17%	19%	0%	17%	19%	17%
Costa Mesa	24%	18%	16%	16%	17%	16%	24%	16%	16%	16%	15%	14%	14%	29%	0%	29%	0%	0%
Fountain Valley	21%	23%	14%	16%	16%	18%	18%	15%	11%	13%	12%	13%	0%	50%	0%	0%	0%	0%
Fullerton	19%	18%	15%	13%	13%	13%	17%	17%	13%	11%	12%	10%	8%	27%	27%	27%	0%	7%
Garden Grove	22%	21%	19%	19%	20%	20%	19%	13%	13%	14%	14%	13%	18%	29%	0%	10%	14%	50%
Huntington Beach	21%	16%	14%	16%	13%	13%	19%	15%	13%	14%	11%	11%	27%	13%	10%	0%	25%	0%
La Habra	17%	16%	15%	16%	16%	15%	15%	14%	13%	16%	17%	13%	13%	0%	29%	17%	0%	10%
Lake Forest	18%	16%	15%	12%	14%	14%	16%	15%	14%	10%	12%	13%	33%	0%	22%	18%	21%	0%
Mission Viejo	19%	15%	15%	15%	12%	12%	18%	14%	14%	13%	11%	11%	21%	14%	20%	6%	25%	13%
Newport Beach	24%	22%	19%	17%	16%	15%	23%	20%	19%	17%	16%	15%	0%	100%	0%	33%	0%	25%
Orange	20%	15%	15%	13%	14%	14%	19%	13%	14%	11%	13%	12%	24%	8%	12%	25%	25%	57%
Rancho Santa Margarita	19%	14%	14%	12%	11%	11%	17%	12%	13%	11%	10%	10%	10%	12%	14%	7%	29%	22%
San Clemente	22%	17%	18%	13%	12%	12%	20%	16%	16%	13%	11%	11%	50%	0%	0%	0%	0%	0%
Santa Ana	28%	24%	25%	20%	21%	20%	23%	19%	19%	15%	15%	16%	32%	18%	5%	25%	45%	29%
Tustin	22%	15%	16%	13%	15%	16%	20%	13%	17%	11%	13%	15%	17%	0%	21%	13%	17%	0%
Orange County Total	**22%**	**18%**	**16%**	**15%**	**15%**	**15%**	**19%**	**15%**	**14%**	**14%**	**12%**	**12%**	**25%**	**15%**	**16%**	**15%**	**14%**	**18%**

Cities	Hispanic						Asian					
	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013
Anaheim	30%	23%	25%	19%	19%	21%	18%	18%	16%	17%	20%	16%
Buena Park	25%	20%	22%	12%	16%	20%	17%	15%	13%	14%	16%	20%
Costa Mesa	24%	19%	28%	21%	19%	20%	20%	19%	13%	16%	21%	17%
Fountain Valley	31%	45%	18%	17%	20%	0%	21%	23%	14%	18%	16%	21%
Fullerton	23%	23%	18%	16%	17%	14%	16%	16%	13%	12%	12%	14%
Garden Grove	35%	24%	31%	21%	25%	19%	18%	22%	16%	20%	21%	23%
Huntington Beach	30%	19%	21%	15%	19%	13%	19%	17%	12%	17%	18%	19%
La Habra	22%	19%	16%	14%	17%	21%	12%	15%	13%	15%	15%	12%
Lake Forest	31%	20%	23%	19%	20%	14%	13%	13%	11%	10%	14%	14%
Mission Viejo	31%	20%	18%	23%	21%	12%	14%	14%	14%	17%	17%	16%
Newport Beach	31%	22%	19%	20%	9%	11%	26%	28%	19%	19%	20%	15%
Orange	29%	19%	28%	18%	15%	15%	14%	13%	14%	11%	15%	15%
Rancho Santa Margarita	43%	21%	21%	17%	15%	11%	15%	18%	13%	13%	14%	14%
San Clemente	34%	24%	17%	2%	15%	16%	27%	18%	34%	15%	22%	18%
Santa Ana	33%	27%	32%	23%	22%	23%	21%	21%	20%	19%	24%	22%
Tustin	32%	20%	24%	20%	21%	20%	17%	13%	11%	11%	14%	13%
Orange County Total	**30%**	**23%**	**25%**	**19%**	**19%**	**19%**	**18%**	**17%**	**14%**	**15%**	**17%**	**16%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
1 - Includes conventional and govt-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Denial rate based on applications that went through the complete underwriting process,
and excludes applications withdrawn or files closed for incompleteness.

Additional analysis was completed on loans denied by race/ethnicity. Loan denials at the Census Tract level by minority percentage were also analyzed. Table 4-9 and Figure 4-1 show the number and percent of purchase loans denied by minority category at the Census Tract level by city and County. Appendix C-2 shows the details, listing all Census Tracts and figures. In general, Overall, the lower the percentage of minority residents within a Census Tract, lower the denial rate.

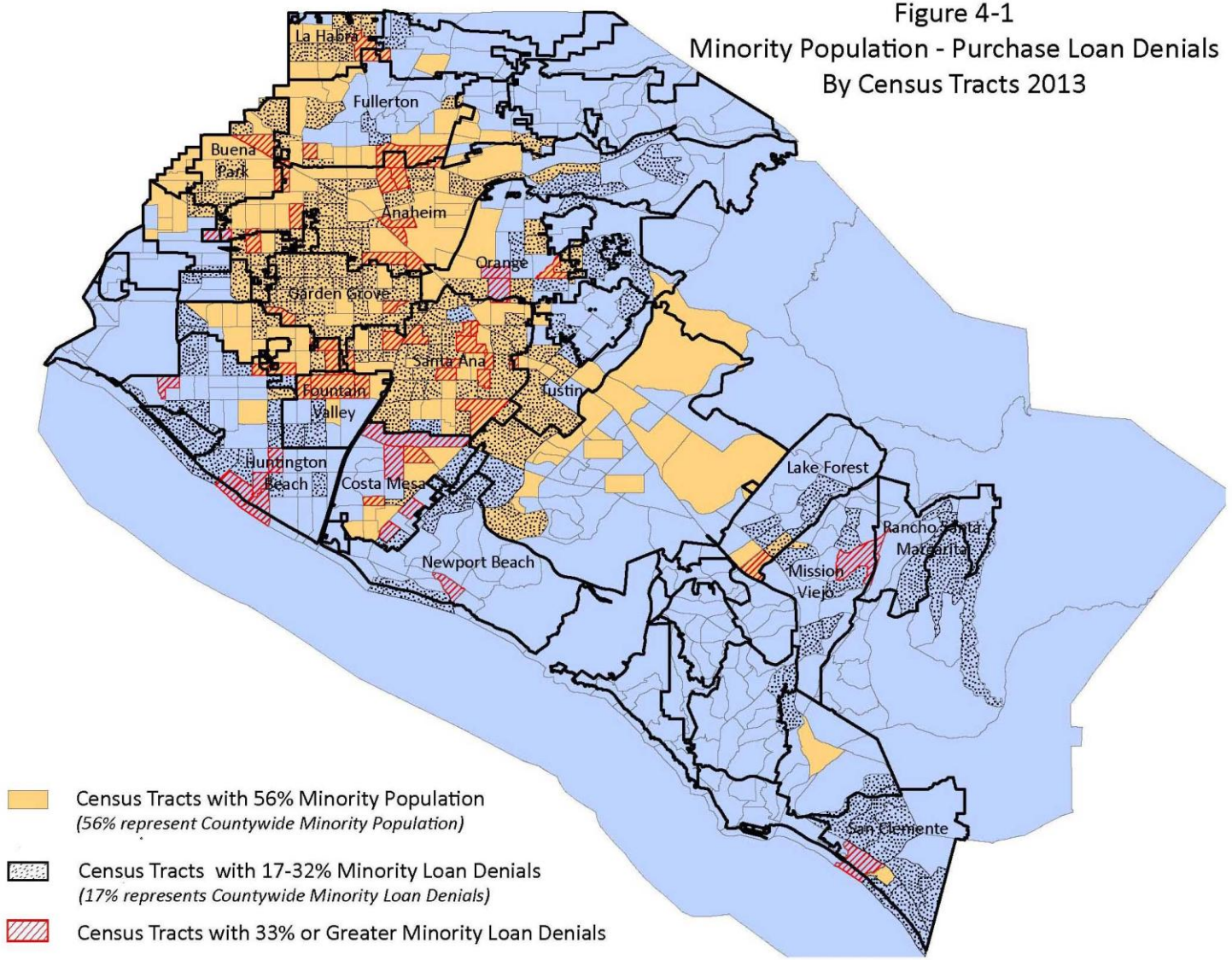
Table 4-9: Home Purchase Loans - Denied by Race/Ethnicity - Per Census Tract - 2013

	Total			<10% Minority			10-20% Minority			20-30% Minority			30-40% Minority			40-50% Minority		
Cities	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %
Anaheim	3,655	591	16.17%	0	-	-	0	-	-	0	-	-	534	62	11.61%	481	55	11.43%
Buena Park	796	143	17.96%	0	-	-	0	-	-	0	-	-	0	-	-	0	-	-
Costa Mesa	1,471	229	15.57%	0	-	-	91	13	14.29%	434	57	13.13%	200	29	14.50%	254	49	19.29%
Fountain Valley	640	112	17.50%	0	-	-	0	-	-	0	-	-	180	28	15.56%	53	5	9.43%
Fullerton	1,741	220	12.64%	0	-	-	0	-	-	0	-	-	217	28	12.90%	388	35	9.02%
Garden Grove	1,944	396	20.37%	0	-	-	0	-	-	93	6	6.45%	122	13	10.66%	39	7	17.95%
Huntington Beach	2,359	318	13.48%	0	-	-	121	22	18.18%	1,319	169	12.81%	638	73	11.44%	24	3	12.50%
La Habra	948	141	14.87%	0	-	-	0	-	-	0	-	-	0	-	-	252	43	17.06%
Lake Forest	2,091	295	14.11%	0	-	-	0	-	-	260	32	12.31%	193	19	9.84%	1,221	179	14.66%
Mission Viejo	2,387	296	12.40%	0	-	-	247	37	14.98%	1,156	127	10.99%	598	63	10.54%	215	43	20.00%
Newport Beach	2,011	295	14.67%	63	3	4.76%	885	133	15.03%	484	53	10.95%	106	22	20.75%	446	81	18.16%
Orange	2,355	330	14.01%	0	-	-	0	-	-	213	33	15.49%	435	56	12.87%	780	96	12.31%
Rancho Santa Margarita	1,641	185	11.27%	0	-	-	286	38	13.29%	404	34	8.42%	784	96	12.24%	167	17	10.18%
San Clemente	1,301	159	12.22%	0	-	-	530	74	13.96%	695	71	10.22%	49	9	18.37%	0	-	-
Santa Ana	2,162	441	20.40%	0	-	-	0	-	-	0	-	-	0	-	-	77	9	11.69%
Tustin	1,281	205	16.00%	0	-	-	0	-	-	201	29	14.43%	191	34	17.80%	335	43	12.84%
Orange County Total	**33,742**	**4,900**	**14.52%**	**63**	**3**	**4.76%**	**3,201**	**450**	**14.06%**	**5,953**	**687**	**11.54%**	**6,426**	**832**	**12.95%**	**6,074**	**829**	**13.65%**

	50-60% Minority			60-70% Minority			70-80% Minority			80-90% Minority			90-100% Minority			Unknown/NA		
Cities	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %
Anaheim	251	51	20.32%	619	91	14.70%	735	116	15.78%	869	173	19.91%	166	43	25.90%	-	-	#DIV/0!
Buena Park	55	17	30.91%	417	64	15.35%	252	42	16.67%	72	20	27.78%	0	-	-	0	-	-
Costa Mesa	209	33	15.79%	69	12	17.39%	157	29	18.47%	57	7	12.28%	0	-	-	0	-	-
Fountain Valley	104	22	21.15%	120	16	13.33%	89	19	21.35%	94	22	23.40%	0	-	-	0	-	-
Fullerton	66	12	18.18%	434	60	13.82%	362	39	10.77%	274	46	16.79%	0	-	-	0	-	-
Garden Grove	10	1	10.00%	198	39	19.70%	449	94	20.94%	887	201	22.66%	146	35	23.97%	0	-	-
Huntington Beach	147	22	14.97%	32	11	34.38%	78	18	23.08%	-	-	-	0	-	-	0	-	-
La Habra	236	29	12.29%	169	22	13.02%	166	22	13.25%	125	25	20.00%	0	-	-	0	-	-
Lake Forest	99	16	16.16%	318	49	15.41%	-	-	-	-	-	-	0	-	-	0	-	-
Mission Viejo	171	26	15.20%	0	-	-	-	-	-	-	-	-	0	-	-	0	-	-
Newport Beach	0	-	-	27	3	11.11%	-	-	-	-	-	-	0	-	-	0	-	-
Orange	284	35	12.32%	517	92	17.79%	103	14	13.59%	23	4	17.39%	0	-	-	0	-	-
Rancho Santa Margarita	0	-	-	0	-	-	-	-	-	-	-	-	0	-	-	0	-	-
San Clemente	27	5	18.52%	0	-	-	-	-	-	-	-	-	0	-	-	0	-	-
Santa Ana	218	34	15.60%	194	39	20.1%	302	55	18.21%	439	85	19.36%	932	219	23.50%	0	-	-
Tustin	204	27	13.24%	-	-	-	281	55	19.57%	41	6	14.63%	28	11	39.29%	0	-	-
Orange County Total	**2,642**	**395**	**14.95%**	**3,272**	**474**	**14.49%**	**2,315**	**404**	**17.45%**	**2,635**	**543**	**20.61%**	**1,155**	**281**	**24.33%**	**6**	**2**	**33.33%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
1 - Includes conventional and government-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Denial rate based on applications that went through the complete underwriting process, and excludes applications withdrawn or files closed for incompleteness.

Figure 4-1
Minority Population - Purchase Loan Denials
By Census Tracts 2013



Income Level - Applicants

In addition to analyzing loans by race, loans by income were also reviewed. Table 4-10 lists each of the Orange County 16 Cities' home purchase loans in 2013 by the following income categories: Low (<50% of AMI), Moderate (50-79% of AMI), Middle (80-119% of AMI) and Upper (>120% of AMI). The income levels used in the HMDA analysis is different than the definitions used by HUD to determine low and moderate areas.

Given the relatively expensive housing market in Orange County, it is reasonable to note that over half of the purchase loans (61 percent) were made to applicants in the Upper income category.

Table 4-10: Status of Home Purchase Loans by Applicant Income 2013

	Total	Low		Moderate		Middle		Upper		Unk/NA	
Cities	#	#	%	#	%	#	%	#	%	#	%
Anaheim	3,655	199	5.44%	696	19.04%	1,068	29.22%	1,539	42.11%	153	4.19%
Buena Park	796	37	4.65%	136	17.09%	266	33.42%	318	39.95%	39	4.90%
Costa Mesa	1,471	24	1.63%	113	7.68%	279	18.97%	999	67.91%	56	3.81%
Fountain Valley	640	12	1.88%	90	14.06%	159	24.84%	353	55.16%	26	4.06%
Fullerton	1,741	59	3.39%	230	13.21%	516	29.64%	875	50.26%	61	3.50%
Garden Grove	1,944	153	7.87%	482	24.79%	572	29.42%	653	33.59%	84	4.32%
Huntington Beach	2,359	34	1.44%	220	9.33%	437	18.52%	1,612	68.33%	56	2.37%
La Habra	948	54	5.70%	171	18.04%	265	27.95%	417	43.99%	41	4.32%
Lake Forest	2,091	34	1.63%	206	9.85%	408	19.51%	1,383	66.14%	60	2.87%
Mission Viejo	2,387	42	1.76%	196	8.21%	490	20.53%	1,614	67.62%	45	1.89%
Newport Beach	2,011	10	0.50%	42	2.09%	140	6.96%	1,684	83.74%	135	6.71%
Orange	2,355	37	1.57%	212	9.00%	505	21.44%	1,518	64.46%	83	3.52%
Rancho Santa Margarita	1,641	31	1.89%	154	9.38%	334	20.35%	1,085	66.12%	37	2.25%
San Clemente	1,301	14	1.08%	59	4.53%	150	11.53%	1,052	80.86%	26	2.00%
Santa Ana	2,162	172	7.96%	576	26.64%	648	29.97%	683	31.59%	83	3.84%
Tustin	1,281	46	3.59%	149	11.63%	264	20.61%	792	61.83%	30	2.34%
Orange County Total	**33,742**	**978**	**2.90%**	**3,789**	**11.23%**	**7,128**	**21.13%**	**20,661**	**61.23%**	**1,186**	**3.51%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
1 - Includes conventional and government-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Denial rate based on applications that went through the complete underwriting process, and excludes applications withdrawn or files closed for incompleteness.
Income Categories: Low (<50% AMI), Moderate (50-79% AMI), Middle (80-119% AMI) & Upper (>120% AMI)
AMI = Area Median Income

Loan denial rates by income category of applicants were also reviewed. (Please see Table 4-11.) Lower income applicants had significantly higher denial rates, most likely due to lending institutions' strict underwriting standards, which have toughened since the financial/housing bubble problems of the mid 2000's. As noted earlier, on average, the purchase loan denial rate in Orange County was 15 percent in 2013. In Orange County, the overall denial rates by income level in 2013 were:

- Low Income: 37 percent
- Moderate Income: 20 percent
- Middle Income: 15 percent
- Upper Income: 12 percent

Table 4-11: Denied Home Purchase Loans by Applicant Income 2013

	Total			Low			Moderate			Middle			Upper			Unk/NA		
Cities	Total Comp	Denied Apps.	Denied %	Total Comp	Denied Apps.	Denied %	Total Comp	Denied Apps.	Denied %	Total Comp	Denied Apps.	Denied %	Total Comp	Denied Apps.	Denied %	Total Comp	Denied Apps.	Denied %
Anaheim	3,655	591	16.17%	199	74	37.19%	696	141	20.26%	1,068	162	15.17%	1,539	190	12.35%	153	24	15.69%
Buena Park	796	143	17.96%	37	15	40.54%	136	24	17.65%	266	37	13.91%	318	63	19.81%	39	4	10.26%
Costa Mesa	1,471	229	15.57%	24	10	41.67%	113	23	20.35%	279	56	20.07%	999	135	13.51%	56	5	8.93%
Fountain Valley	640	112	17.50%	12	5	41.67%	90	20	22.22%	159	36	22.64%	353	47	13.31%	26	4	15.38%
Fullerton	1,741	220	12.64%	59	23	38.98%	230	38	16.52%	516	58	11.24%	875	93	10.63%	61	8	13.11%
Garden Grove	1,944	396	20.37%	153	62	40.52%	482	103	21.37%	572	111	19.41%	653	101	15.47%	84	19	22.62%
Huntington Beach	2,359	318	13.48%	34	19	55.88%	220	37	16.82%	437	70	16.02%	1,612	186	11.54%	56	6	10.71%
La Habra	948	141	14.87%	54	14	25.93%	171	36	21.05%	265	40	15.09%	417	45	10.79%	41	6	14.63%
Lake Forest	2,091	295	14.11%	34	10	29.41%	206	47	22.82%	408	65	15.93%	1,383	152	10.99%	60	21	35.00%
Mission Viejo	2,387	296	12.40%	42	12	28.57%	196	26	13.27%	490	61	12.45%	1,614	186	11.52%	45	11	24.44%
Newport Beach	2,011	295	14.67%	10	3	30.00%	42	10	23.81%	140	38	27.14%	1,684	221	13.12%	135	23	17.04%
Orange	2,355	330	14.01%	37	8	21.62%	212	40	18.87%	505	72	14.26%	1,518	194	12.78%	83	16	19.28%
Rancho Santa Margarita	1,641	185	11.27%	31	9	29.03%	154	17	11.04%	334	35	10.48%	1,085	118	10.88%	37	6	16.22%
San Clemente	1,301	159	12.22%	14	3	21.43%	59	16	27.12%	150	16	10.67%	1,052	121	11.50%	26	3	11.54%
Santa Ana	2,162	441	20.40%	172	70	40.70%	576	138	23.96%	648	117	18.06%	683	100	14.64%	83	16	19.28%
Tustin	1,281	205	16.00%	46	20	43.48%	149	41	27.52%	264	39	14.77%	792	99	12.50%	30	6	20.00%
Orange County Total	**33,742**	**4,900**	**14.52%**	**978**	**361**	**36.91%**	**3,789**	**764**	**20.16%**	**7,128**	**1,092**	**15.32%**	**20,661**	**2,473**	**11.97%**	**1,186**	**210**	**17.71%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
1 - Includes conventional and government-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Denial rate based on applications that went through the complete underwriting process, and excludes applications withdrawn or files closed for incompleteness.
Income Categories: Low (<50% AMI), Moderate (50-79% AMI), Middle (80-119% AMI) & Upper (>120% AMI)
AMI = Area Median Income

D. Lending Patterns by Census Tract Characteristics

Income Level by Census Tract

Loan denial rates based on residents income was reviewed by Census Tract in the Orange County 16 City study area. The purpose of this analysis was to identify differences in loan activities by geographic area. Table 4-12 lists loans by city per income level of Census Tract. The vast majority of census tracts in Orange County are considered middle or upper income. Over half of the 16 cities in the study area did not have any loans completed in low-income Census Tracts, most likely due to the fact that low-income Census Tracts were almost non-existent in these cities. The denial rates by income level per Census Tract in 2013 were:

- Low Income: 22 percent
- Moderate Income: 19 percent
- Middle Income: 15 percent
- Upper Income: 13 percent

Table 4-12: Home Purchase Loans - Denied by Income - Per Census Tract - 2013

	Total			Low (<50% AMI)			Moderate (50-79% of AMI)			Middle (80-119% AMI)			Upper (>120% AMI)			Unknown		
Cities	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %	Tot. Comp.	Denied Apps.	Denied %
Anaheim	3,655	591	16.17%	331	62	18.73%	1,415	258	18.23%	1,031	176	17.07%	873	95	10.88%	5	-	0.00%
Buena Park	796	143	17.96%	29	13	44.83%	228	34	14.91%	539	96	17.81%	0	-	-	-	-	-
Costa Mesa	1,471	229	15.57%	18	1	5.56%	466	86	18.45%	795	117	14.72%	192	25	13.02%	-	-	-
Fountain Valley	640	112	17.50%	0	-	-	217	28	12.90%	253	50	19.76%	170	34	20.00%	-	-	-
Fullerton	1,741	220	12.64%	43	12	27.91%	395	43	10.89%	1,027	141	13.73%	276	24	8.70%	-	-	-
Garden Grove	1,944	396	20.37%	63	17	26.98%	1,041	220	21.13%	743	145	19.52%	97	14	14.43%	-	-	-
Huntington Beach	2,359	318	13.48%	0	-	-	268	35	13.06%	810	119	14.69%	1,281	164	12.80%	-	-	-
La Habra	948	141	14.87%	0	-	-	271	50	18.45%	551	82	14.88%	126	9	7.14%	-	-	-
Lake Forest	2,091	295	14.11%	0	-	-	74	23	31.08%	574	90	15.68%	1,255	165	13.15%	188	17	9.04%
Mission Viejo	2,387	296	12.40%	0	-	-	72	10	13.89%	667	100	14.99%	1,648	186	11.29%	-	-	-
Newport Beach	2,011	295	14.67%	0	-	-	236	48	20.34%	155	22	14.19%	1,620	225	13.89%	-	-	-
Orange	2,355	330	14.01%	0	-	-	300	54	18.00%	626	84	13.42%	1,429	192	13.44%	-	-	-
Rancho Santa Margarita	1,641	185	11.27%	0	-	-	-	-	-	385	44	11.43%	1,256	141	11.23%	-	-	-
San Clemente	1,301	159	12.22%	0	-	-	85	9	10.59%	414	58	14.01%	802	92	11.47%	-	-	-
Santa Ana	2,162	441	20.40%	178	40	22.47%	1,257	273	21.72%	671	122	18.18%	56	6	10.71%	-	-	-
Tustin	1,281	205	16.00%	18	8	44.44%	215	48	22.33%	411	62	15.09%	637	87	13.66%	-	-	-
Orange County Total	**33,742**	**4,900**	**14.52%**	**696**	**151**	**21.70%**	**6,047**	**1,134**	**18.75%**	**10,574**	**1,567**	**14.82%**	**16,226**	**2,029**	**12.50%**	**199**	**19**	**9.55%**

Source: www.lendingpatterns.com, October 2015
Tabulations: GRC Associates, Inc., October 2015
1 - Includes conventional and government-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Denial rate based on applications that went through the complete underwriting process, and excludes applications withdrawn or files closed for incompleteness.

E. Lending Performance by Lender

General Overview

Table 4-13 shows the top 10 lenders by city and Orange County in 2013. Wells Fargo is the top lender in all of the cities in the 16 cities and the County. The next two larger banks are Bank of America and JP Morgan Chase Bank. Table 4-13 also shows denial rates by mortgage lending institution by city and County. Most cities have the same lenders, with few exceptions at the lower end of the top 10 lenders. Notable is the fact that Wells Fargo has a denial rate of 19 percent countywide. Though, by city, the denial rate ranges from a low of 14 percent in Lake Forest and Newport Beach, to a high of 30 percent in Santa Ana. A few lenders had very low denial rates in some cities, such as Flagstar Bank, Quicken Loans and Chicago Mortgage Solutions, LLC.

Table 4-13: Top 10 Lenders - All Home Loan Applications, 2013

	Total Home Loans			# 1				# 2				# 3				# 4			
Cities	Tot. Comp.	Denied Apps.	Denied %	Lender	Tot. Comp.	Denied Apps.	Denied %	Lender	Tot. Comp.	Denied Apps.	Denied %	Lender	Tot. Comp.	Denied Apps.	Denied %	Lender	Tot. Comp.	Denied Apps.	Denied %	Lender
Anaheim	14,749	2,990	20.27%	Wells	1,497	346	23.11%	BofA	1,002	221	22.06%	JPM	863	225	26.07%	Flag.	625	63	10.08%	Cash
Buena Park	3,730	795	21.31%	Wells	382	98	25.65%	JPM	275	62	22.55%	BofA	228	48	21.05%	Flag.	149	14	9.40%	Citi
Costa Mesa	5,978	1,176	19.67%	Wells	642	134	20.87%	BofA	337	80	23.74%	Flag.	327	44	13.46%	JPM	326	79	24.23%	Citi
Fountain Valley	3,209	639	19.91%	Wells	316	66	20.89%	BofA	216	48	22.22%	Flag.	193	21	10.88%	School.	146	14	9.59%	JPM
Fullerton	7,582	1,412	18.62%	Wells	807	170	21.07%	BofA	522	94	18.01%	JPM	442	103	23.30%	Flag.	351	40	11.40%	School.
Garden Grove	8,373	1,886	22.52%	Wells	709	201	28.35%	BofA	592	117	19.76%	JPM	464	112	24.14%	Flag.	447	67	14.99%	PMAC
Huntington Beach	10,816	1,883	17.41%	Wells	1,370	264	19.27%	BofA	710	123	17.32%	JPM	657	164	24.96%	Flag.	596	53	8.89%	Cash
La Habra	3,612	684	18.94%	Wells	428	93	21.73%	BofA	234	51	21.79%	JPM	232	53	22.84%	Flag.	143	12	8.39%	Cash
Lake Forest	6,343	1,102	17.37%	Wells	875	121	13.83%	BofA	362	59	16.30%	Flag.	314	37	11.78%	JPM	256	60	23.44%	Nation
Mission Viejo	10,009	1,665	16.64%	Wells	1,129	205	18.16%	BofA	664	120	18.07%	Flag.	524	52	9.92%	JPM	465	128	27.53%	Cash
Newport Beach	8,383	1,568	18.70%	Wells	1,383	197	14.24%	BofA	782	160	20.46%	JPM	527	135	25.62%	Union	489	116	23.72%	Citi
Orange	10,636	1,858	17.47%	Wells	1,211	235	19.41%	BofA	712	130	18.26%	JPM	589	136	23.09%	Flag.	542	49	9.04%	Cash
Rancho Santa Margarita	6,460	1,021	15.80%	Wells	720	128	17.78%	BofA	356	62	17.42%	Flag.	347	38	10.95%	JPM	275	63	22.91%	Quick.
San Clemente	5,477	968	17.67%	Wells	844	131	15.52%	BofA	347	53	15.27%	Flag.	246	30	12.20%	JPM	229	68	29.69%	Cash
Santa Ana	9,194	2,209	24.03%	Wells	955	290	30.37%	BofA	811	179	22.07%	JPM	551	172	31.22%	School.	427	97	22.72%	Flag.
Tustin	5,804	1,086	18.71%	Wells	637	122	19.15%	BofA	404	88	21.78%	JPM	298	91	30.54%	Flag.	293	33	11.26%	Cash
Orange County Total	**138,845**	**25,917**	**18.67%**	**Wells**	**16,700**	**3,186**	**19.08%**	**BofA**	**9,553**	**1,795**	**18.79%**	**JPM**	**7,465**	**1,895**	**25.39%**	**Flag.**	**6,806**	**772**	**11.34%**	**Cash**

	# 6				# 7				# 8				# 9				# 10			
Cities	Lender	Tot. Comp.	Denied Apps.	Denied %	Lender	Tot. Comp.	Denied Apps.	Denied %	Lender	Tot. Comp.	Denied Apps.	Denied %	Lender	Tot. Comp.	Denied Apps.	Denied %	Lender	Tot. Comp.	Denied Apps.	Denied %
Anaheim	School.	526	100	19.01%	Citi	442	105	23.76%	Quick.	394	57	14.47%	Nation.	331	121	36.56%	Chicago	273	*	*
Buena Park	School.	125	35	28.00%	Cash	117	39	33.33%	Nation.	94	37	39.36%	Green.	94	41	43.62%	Stearns	83	*	*
Costa Mesa	Cash	182	50	27.47%	School	165	20	12.12%	Chicago	151	*	*	Quick.	148	23	15.54%	Univ.	133	*	*
Fountain Valley	Cash	116	35	30.17%	Citi	108	29	26.9%	JMAC	102	*	*	Quick.	89	13	14.61%	PMAC	87	42	48.28%
Fullerton	Cash	254	80	31.50%	Citi	248	64	25.81%	Quick.	183	19	10.38%	Nation.	177	69	38.98%	Chicago	157	*	*
Garden Grove	JMAC	318	28	8.81%	School	309	51	16.50%	Citi	303	76	25.08%	Cash	261	82	31.42%	Quick.	211	41	19.43%
Huntington Beach	Citi	356	76	21.35%	School	351	41	11.68%	Quick.	312	52	16.67%	Chicago	242	*	*	Stearns	233	*	*
La Habra	Citi	110	21	19.09%	Quick.	89	9	10.11%	School	85	11	12.94%	Nation.	85	36	42.35%	Broker	67	9	13.43%
Lake Forest	Cash	209	67	32.06%	Quick.	190	27	14.21%	Citi	169	31	18.34%	School	160	37	23.13%	Stearns	151	*	*
Mission Viejo	Quick.	342	46	13.45%	Citi	299	79	26.42%	School	282	45	15.96%	Chicago	281	22	7.83%	Nation	238	93	39.08%
Newport Beach	Flag.	292	42	14.38%	Quick.	229	37	16.16%	US	205	64	31.22%	Cash	176	57	32.39%	Chicago	153	*	*
Orange	Quick.	361	74	20.50%	School	335	42	12.54%	Citi	325	78	24.00%	Chicago	255	*	*	Stearns	229	*	*
Rancho Santa Margarita	Cash	212	48	22.64%	Chicago	189	*	*	Stearns	159	*	*	Citi	157	39	24.84%	School.	149	19	12.75%
San Clemente	Quick.	172	24	13.95%	Citi	164	38	23.17%	Chicago	152	14	9.21%	US	148	43	29.05%	Union	122	26	21.31%
Santa Ana	Citi	312	79	25.32%	Nation.	214	86	40.19%	Quick.	214	44	20.56%	Cash	214	72	33.64%	PMAC	175	73	41.71%
Tustin	School.	194	23	11.86%	Citi	189	36	19.05%	Quick.	185	27	14.59%	Chicago	138	*	*	Stearns	113	*	*
Orange County Total	**Citi**	**4,206**	**1,032**	**24.54%**	**Quick.**	**4,061**	**653**	**16.08%**	**School**	**4,041**	**671**	**16.60%**	**Chicago**	**3,112**	*	*	**Nation**	**2,847**	**1,051**	**36.92%**

* Loans by these financial institutions were out of the top 15 financial institutions denying loans. Financial Institutions:

Wells	= Wells Fargo Bank	Citi	= Citibank	Univ.	= Universal American Mortgage of CA
BofA	= Bank of America	Quick.	= Quicken Loans, Inc.	JMAC	= JMAC Lending, Inc.
JPM	= JPMorgan Chase Bank	Nation	= Nationstar Mortgage, LLC	PMAC	= PMAC Lending, Inc.
Flag.	= Flagstar Bk FSB	Chicago	= Chicago Mortgage Solutions LLC	Broker	= Broker Solutions, Inc.
Cash	= Cashcall, Inc.	Green	= Greenlight Financial Services	Union	= Union Bank
School.	= Schoolfirst FCU	Stearns	= Stearns Lending, Inc.	US	= US Bank

Source: www.lendingpatterns.com, October 2015

Tabulations: GRC Associates, Inc., October 2015

Denial rate based on applications that went through the complete underwriting process, and exclude applications withrawan or files closed for incompleteness.

Disposition by Loan Applicants Income

Additional research was completed on mortgage lending institutions by income and minority applicants. Table 4-14 lists the top 10 lenders by city and County with the market share of each financial institution and percent of loans going to applicants with low and moderate incomes and percent minority. Some key findings include:

- Wells Fargo has a 12 percent share of the home loan market. In some cities like Newport Beach, Wells Fargo has a large share of the market at almost 17 percent. While in another city, Wells Fargo has around eight percent of the market (Garden Grove).
- Minority applicants typically have a third of the market share of loans. However, in some cities, minority applicants make up a much bigger share of the market for some lenders. PMAC Lending, Inc., which is favored by Asian applicants, makes 99 percent of their loans to minorities in Fountain Valley, 95 percent to minorities in Garden Grove and 94 percent to minorities in Santa Ana.

Table 4-14: Top 10 Lenders - Market Share and Income and Minority Categories - All Home Loan Applications, 2013

	# 1				# 2				# 3				# 4				# 5			
Cities	Lender	% Share	% Low -Mod	% Min-ority	Lender	% Share	% Low -Mod	% Min-ority	Lender	% Share	% Low -Mod	% Min-ority	Lender	% Share	% Low -Mod	% Min-ority	Lender	% Share	% Low -Mod	% Min-ority
Anaheim	Wells	10.15%	27%	44%	BofA	6.79%	41%	50%	JPM	5.85%	39%	42%	Flag.	4.24%	26%	48%	Cash	3.72%	25%	25%
Buena Park	Wells	10.24%	28%	57%	JPM	7.37%	41%	48%	BofA	6.11%	44%	51%	Flag.	3.99%	25%	59%	Citi	3.59%	40%	46%
Costa Mesa	Wells	10.74%	12%	18%	BofA	5.64%	19%	27%	Flag.	5.47%	11%	27%	JPM	5.45%	25%	18%	Citi	3.31%	27%	20%
Fountain Valley	Wells	9.85%	21%	55%	BofA	6.73%	40%	52%	Flag.	6.01%	17%	52%	School.	4.55%	24%	23%	JPM	4.39%	28%	47%
Fullerton	Wells	10.64%	23%	48%	BofA	6.88%	34%	48%	JPM	5.83%	37%	42%	Flag.	4.63%	15%	50%	School.	3.75%	26%	34%
Garden Grove	Wells	8.47%	35%	59%	BofA	7.07%	48%	62%	JPM	5.54%	41%	51%	Flag.	5.34%	35%	64%	PMAC	3.97%	51%	95%
Huntington Beach	Wells	12.67%	12%	19%	BofA	6.56%	21%	23%	JPM	6.07%	24%	19%	Flag.	5.51%	16%	25%	Cash	3.76%	16%	16%
La Habra	Wells	11.85%	22%	50%	BofA	6.48%	31%	52%	JPM	6.42%	33%	41%	Flag.	3.96%	16%	48%	Cash	3.46%	23%	23%
Lake Forest	Wells	13.79%	12%	38%	BofA	5.71%	25%	30%	Flag.	4.95%	13%	40%	JPM	4.04%	23%	25%	Nation	3.72%	12%	39%
Mission Viejo	Wells	11.28%	12%	18%	BofA	6.63%	22%	18%	Flag.	5.24%	11%	22%	JPM	4.65%	21%	15%	Cash	3.43%	14%	15%
Newport Beach	Wells	16.50%	3%	14%	BofA	9.33%	7%	12%	JPM	6.29%	8%	10%	Union	5.83%	2%	3%	Citi	3.57%	13%	14%
Orange	Wells	11.39%	13%	27%	BofA	6.69%	21%	29%	JPM	5.54%	20%	30%	Flag.	5.10%	10%	39%	Cash	3.97%	14%	23%
Rancho Santa Margarita	Wells	11.15%	12%	16%	BofA	5.51%	17%	16%	Flag.	5.37%	11%	21%	JPM	4.26%	18%	15%	Quick.	3.64%	12%	14%
San Clemente	Wells	15.41%	9%	6%	BofA	6.34%	15%	9%	Flag.	4.49%	7%	11%	JPM	4.18%	16%	9%	Cash	3.34%	14%	14%
Santa Ana	Wells	10.39%	37%	63%	BofA	8.82%	51%	70%	JPM	5.99%	48%	57%	School.	4.64%	41%	60%	Flag.	3.74%	34%	62%
Tustin	Wells	10.98%	15%	30%	BofA	6.96%	21%	36%	JPM	5.13%	22%	28%	Flag.	5.05%	12%	42%	Cash	3.69%	18%	16%
Orange County Total	**Wells**	12.03%	15%	30%	**BofA**	6.88%	26%	33%	**JPM**	5.38%	26%	31%	**Flag.**	4.90%	16%	39%	**Cash**	3.30%	18%	20%

	# 6				# 7				# 8				# 9				# 10			
Cities	Lender	% Share	% Low -Mod	% Min-ority	Lender	% Share	% Low -Mod	% Min-ority	Lender	% Share	% Low -Mod	% Min-ority	Lender	% Share	% Low -Mod	% Min-ority	Lender	% Share	% Low -Mod	% Min-ority
Anaheim	School.	3.57%	31%	43%	Citi	3.00%	40%	44%	Quick.	2.67%	23%	30%	Nation.	2.24%	29%	37%	Chicago	1.85%	24%	42%
Buena Park	School.	3.35%	39%	40%	Cash	3.14%	30%	36%	Nation.	2.52%	37%	49%	Green.	2.52%	33%	39%	Stearns	2.23%	39%	49%
Costa Mesa	Cash	3.04%	15%	15%	School	2.76%	27%	12%	Chicago	2.53%	11%	21%	Quick.	2.48%	16%	13%	Univ.	2.22%	15%	44%
Fountain Valley	Cash	3.61%	21%	40%	Citi	3.37%	36%	34%	JMAC	3.18%	21%	85%	Quick.	2.77%	18%	30%	PMAC	2.71%	38%	99%
Fullerton	Cash	3.35%	27%	30%	Citi	3.27%	40%	44%	Quick.	2.41%	15%	30%	Nation.	2.33%	27%	34%	Chicago	2.07%	17%	36%
Garden Grove	JMAC	3.80%	39%	92%	School	3.69%	40%	42%	Citi	3.62%	50%	56%	Cash	3.12%	30%	29%	Quick.	2.52%	27%	37%
Huntington Beach	Citi	3.29%	32%	15%	School	3.25%	19%	11%	Quick.	2.88%	11%	17%	Chicago	2.24%	14%	17%	Stearns	2.15%	21%	21%
La Habra	Citi	3.05%	39%	49%	Quick.	2.46%	19%	31%	School	2.35%	22%	31%	Nation.	2.35%	24%	33%	Broker	1.85%	25%	37%
Lake Forest	Cash	3.29%	15%	16%	Quick.	3.00%	17%	21%	Citi	2.66%	31%	28%	School	2.52%	21%	24%	Stearns	2.38%	17%	31%
Mission Viejo	Quick.	3.42%	15%	16%	Citi	2.99%	24%	17%	School	2.82%	21%	17%	Chicago	2.81%	12%	14%	Nation	2.38%	15%	21%
Newport Beach	Flag.	3.48%	9%	27%	Quick.	2.73%	5%	10%	US	2.45%	5%	8%	Cash	2.10%	11%	15%	Chicago	1.83%	8%	19%
Orange	Quick.	3.39%	11%	21%	School	3.15%	16%	22%	Citi	3.06%	25%	31%	Chicago	2.40%	11%	31%	Stearns	2.15%	13%	23%
Rancho Santa Margarita	Cash	3.28%	10%	14%	Chicago	2.93%	12%	16%	Stearns	2.46%	16%	13%	Citi	2.43%	15%	17%	School.	2.31%	15%	15%
San Clemente	Quick.	3.14%	10%	9%	Citi	2.99%	16%	7%	Chicago	2.78%	13%	9%	US	2.70%	8%	6%	Union	2.23%	4%	2%
Santa Ana	Citi	3.39%	51%	57%	Nation.	2.33%	50%	51%	Quick.	2.33%	38%	41%	Cash	2.33%	30%	37%	PMAC	1.90%	49%	94%
Tustin	School.	3.34%	24%	25%	Citi	3.26%	25%	30%	Quick.	3.19%	10%	20%	Chicago	2.38%	17%	28%	Stearns	1.95%	20%	25%
Orange County Total	**Citi**	3.03%	31%	31%	**Quick.**	2.92%	15%	21%	**School**	2.91%	25%	26%	**Chicago**	2.24%	15%	29%	**Nation**	2.05%	22%	30%

* Loans by these financial institutions were out of the top 15 financial institutions denying loans. Financial Institutions:

Wells	= Wells Fargo Bank	Citi	= Citibank	Univ.	= Universal American Mortgage of CA
BofA	= Bank of America	Quick.	= Quicken Loans, Inc.	JMAC	= JMAC Lending, Inc.
JPM	= JPMorgan Chase Bank	Nation	= Nationstar Mortgage, LLC	PMAC	= PMAC Lending, Inc.
Flag.	= Flagstar Bk FSB	Chicago	= Chicago Mortgage Solutions LLC	Broker	= Broker Solutions, Inc.
Cash	= Cashcall, Inc.	Green	= Greenlight Financial Services	Union	= Union Bank
School.	= Schoolfirst FCU	Stearns	= Stearns Lending, Inc.	US	= US Bank

Minority Category includes Asian, Black and Hispanic. Low = % of AMI and Mod = % of AMI

Source: www.lendingpatterns.com, October 2015

Tabulations: GRC Associates, Inc., October 2015

Denial rate based on applications that went through the complete underwriting process, and exclude applications withrawan or files closed for incompleteness.

F. Sub-Prime Lending Market

The subprime lending market in 2011 and 2013 was analyzed. In most cases, the best or prime loans are offered to applicants with good credit history, employment and income. Applicants who do not possess acceptable credit may be offered subprime loans. However, HMDA data does not identify specifically whether a loan is prime or subprime. The best that HMDA provides is whether a loan has a "Rate Spread". Table 4-15 lists the Rate Spread loans for 2011 and 2013. An HMDA Rate Spread occurs when a loan's interest rate exceeds a FFIEC defined "threshold". HMDA provides the following definition about Rate Spread: "For a home purchase loan, a refinancing, or a dwelling-secured home improvement loan that you originated, report the spread (difference) between the annual percentage rate (APR) and the applicable average prime offer rate if the spread is equal to or greater than 1.5 percentage points for first-lien loans or 3.5 percentage points for subordinate-lien loans."

Table 4-15: Home Purchase Loans - Rate Spread, 2011 to 2013

Cities	2011		2013		Change 2011 to 2013	
	% w/Rate Spread	Avg. Spread	% w/Rate Spread	Avg. Spread	% w/Rate Spread	Avg. Spread
Anaheim	2.58%	5.28	5.52%	3.41	2.94%	(1.87)
Buena Park	0.95%	3.60	4.18%	2.07	3.23%	(1.53)
Costa Mesa	1.31%	5.18	2.64%	3.26	1.33%	(1.92)
Fountain Valley	0.91%	5.49	1.48%	2.46	0.57%	(3.03)
Fullerton	2.04%	3.64	2.83%	3.90	0.79%	0.26
Garden Grove	1.64%	6.08	3.83%	3.22	2.19%	(2.86)
Huntington Beach	2.32%	5.25	3.11%	3.47	0.79%	(1.78)
La Habra	4.74%	6.66	6.33%	4.24	1.59%	(2.42)
Lake Forest	2.73%	3.29	3.02%	2.49	0.29%	(0.80)
Mission Viejo	1.41%	3.03	2.87%	2.04	1.46%	(0.99)
Newport Beach	1.65%	3.57	1.36%	2.83	-0.29%	(0.74)
Orange	1.47%	3.77	2.81%	2.94	1.34%	(0.83)
Rancho Santa Margarita	0.81%	1.80	3.11%	1.97	2.30%	0.17
San Clemente	1.26%	3.34	1.53%	1.95	0.27%	(1.39)
Santa Ana	2.85%	4.19	5.98%	2.88	3.13%	(1.31)
Tustin	1.53%	4.79	2.11%	2.52	0.58%	(2.27)
Orange County Total	**1.79%**	**4.27**	**3.08%**	**2.77**	**1.29%**	**(1.50)**

Source: www.lendingpatterns.com, November 2015

Tabulations: GRC Associates, Inc., November 2015

1 - Includes conventional and govt-assisted (FHA, FSA/RHS and VA) home purchase applications.

2 - Includes applications that went through the complete underwriting process, and excludes applications withdrawn or files closed for incompleteness.

3- A HMDA Rate Spread occurs when a loan's interest rate exceeds a FFIEC defined "threshold". HMDA definition of "Rate Spread": For a home purchase loan, a refinancing, or a dwelling-secured home improvement loan that you originated, report the spread (difference) between the annual percentage rate (APR) and the applicable average prime offer rate if the spread is equal to or greater than 1.5 percentage points for first-lien loans or 3.5 percentage points for subordinate-lien loans.

In 2011, less than two percent of loans had Rate Spreads (or had rates high enough that may be considered subprime). The average increase above a prime interest rate was 4.27. By 2013 the number of loans with high rates had increased to about three percent; however, the spread had decreased to 2.77. Thus, it appears lenders are getting more aggressive by providing loans to high-risk applicants and, at the same time, lowering the rates on these types of loans. This type of lending has the effect of both extending fair housing choice to a broader group of people, who would not qualify for regular mortgage lending programs. However, if there are too many of these types of loans, there may be an increase in foreclosures – a situation that occurred during the recent recession.

The Rate Spread loans of top lenders for 2011 and 2013 were tabulated. Listed in Table 4-16 are the market share figures of the top lenders with the percentage of loans they make having a Rate Spread. For the most part, the top lenders have had very few of these type of loans. However, there is one lender that appears to make a significant amount of Rate Spread loans – 21st Mortgage which has 16 percent of their loans being Rate Spread loans and with an average spread of 8.53 in 2013.

Table 4-16: Home Purchase Loans - Rate Spread - Top Orange County Lenders, 2011 & 2013

	2011				2013			
	Lenders	Mkt. Share	% w/Rate Spread	Avg. Spread	Lenders	Mkt. Share	% w/Rate Spread	Avg. Spread
1	Wells Fargo	15.9%	0.40%	1.97	Wells Fargo	13.5%	0.20%	1.59
2	Bank of America	11.0%	0.10%	1.52	Flagstar	5.1%	0.60%	1.75
3	Flagstar Bank	4.6%	0.50%	1.68	Bank of America	4.0%	0.10%	1.57
4	JP Morgan	2.3%	0.20%	1.96	JP Morgan	3.7%	0.30%	1.55
5	Metlife Bank	2.2%	0.00%	-	Stearns	2.3%	1.40%	1.70
6	PMC Corp	2.0%	0.00%	-	21st Mortgage	1.9%	15.70%	8.53
7	Pacific Union	1.9%	2.50%	1.77	imortgage.com	1.9%	3.00%	1.95
8	Paramount Financial	1.8%	0.20%	1.51	Primelending	1.8%	1.50%	1.86
9	Primelending	1.6%	0.50%	1.56	Union Bank	1.7%	0.00%	-
10	Stearns Lending	1.5%	0.00%	-	Broker Solutions, Inc.	1.7%	5.30%	1.71
11	21st Mortgage	1.5%	27.20%	7.79	PMAC Lending	1.6%	0.50%	1.91
12	Pinnacle Capital	1.4%	0.30%	4.03	East W. Bank	1.6%	0.20%	1.51
13	Kiencta FCU	1.3%	0.00%	-	Sierra Pacific	1.5%	0.20%	1.62
14	imorrgage.com	1.3%	0.80%	1.81	Paramount Residential	1.4%	5.80%	1.71
15	JMAC Lending	1.3%	0.00%	-	Pacific Union	1.4%	5.20%	1.78
	Orange County Total	**100.0%**	**1.79%**	**4.27**	**Orange County Total**	**100.0%**	**3.08%**	**2.77**

Source: www.lendingpatterns.com, November 2015
Tabulations: GRC Associates, Inc., November 2015
1 - Includes conventional and govt-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Includes applications that went through the complete underwriting process,
and excludes applications withdrawn or files closed for incompleteness.
3- A HMDA Rate Spread occurs when a loan's interest rate exceeds a FFIEC defined "threshold". HMDA definition of "Rate Spread": For a home purchase loan, a refinancing, or a dwelling-secured home improvement loan that you originated, report the spread (difference) between the annual percentage rate (APR) and the applicable average prime offer rate if the spread is equal to or greater than 1.5 percentage points for first-lien loans or 3.5 percentage points for subordinate-lien loans.

G. Predatory Lending

The potential of predatory lending occurrences in the Orange County 16 City study area was also reviewed. Predatory lending occurs when applicants are targeted with abusive practices, such as higher fees, hidden costs and other related practices. The HMDA database identifies HOEPA or "high cost" loans. As defined by HMDA "HOEPA" loans include: "HOEPA Status. Report whether each loan you originated or purchased is covered by the Home Ownership and Equity Protection Act of 1994 (HOEPA), as implemented in Regulation Z (12 C.F.R. § 1026.32). Coverage under HOEPA, which requires special disclosures and regulates the terms of covered loans, is determined by comparing a loan's APR and its points and fees to triggers specified in the regulation. See 12 C.F.R. § 1026.32(a) and (b)." Table 4-17 lists the HOEPA loans in the study area and Orange County. Based on the HMDA database, there are very few in any of these types of loans.

Table 4-17: All Types of Loans - High Cost Loans (HOEPA), 2011 to 2013

Cities	2011 # of HOEPA Loans	2013 # of HOEPA Loans	Change 2011 to 2013 Inc./Dec.
Anaheim	-	1	1
Buena Park	-	-	-
Costa Mesa	-	-	-
Fountain Valley	-	-	-
Fullerton	-	1	1
Garden Grove	-	-	-
Huntington Beach	1	-	(1)
La Habra	-	-	-
Lake Forest	-	-	-
Mission Viejo	-	-	-
Newport Beach	-	-	-
Orange	1	-	(1)
Rancho Santa Margarita	-	-	-
San Clemente	-	-	-
Santa Ana	-	-	-
Tustin	-	-	-
Orange County Total	**2**	**2**	**-**

Source: www.lendingpatterns.com, November 2015
Tabulations: GRC Associates, Inc., November 2015
1 - Includes conventional and govt-assisted (FHA, FSA/RHS and VA) home purchase applications.
2 - Includes applications that went through the complete underwriting process,
and excludes applications withdrawn or files closed for incompleteness.
3- HMDA definition of HOEPA Loans: HOEPA Status: Report whether each loan you originated or purchased is covered by the Home Ownership and Equity Protection Act of 1994 (HOEPA), as implemented in Regulation Z (12 C.F.R. § 1026.32). For further guidance, see Appendix A (I.G.3). Coverage under HOEPA, which requires special disclosures and regulates the terms of covered loans, is determined by comparing a loan's APR and its points and fees to triggers specified in the regulation. See 12 C.F.R. § 1026.32(a) and (b).

H. Foreclosures

Foreclosure data has been gathered for each of the 16 cities in the study area and countywide. The foreclosure process begins when owner(s) stop making mortgage payments and it can be stopped when the owner(s) makes all payments and becomes current with the lender. If owner(s) and lender do not agree on how to resolve the situation of missed mortgage payments, then the lender has the right to use the foreclosure process in court to take over the home and get its loan funds back. Table 4-18 shows the number of homes that are in various states of foreclosure in the 16 cities of the study area. As can be noted, there are few homes in foreclosure – less than one percent.

Table 4-18: Foreclosures, September 2015

Cities	Foreclosure Distribution				Foreclosures % of Total Housing Stock
	Pre-Foreclosure	Auction	Bank Owned	Total	
Anaheim	230	246	90	566	0.5%
Buena Park	69	14	69	152	0.6%
Costa Mesa	49	49	28	127	0.3%
Fountain Valley	8	25	21	55	0.3%
Fullerton	135	39	48	222	0.5%
Garden Grove	105	70	47	222	0.5%
Huntington Beach	206	147	44	396	0.5%
La Habra	55	71	39	165	0.8%
Lake Forest	100	62	50	212	0.8%
Mission Viejo	100	67	67	234	0.7%
Newport Beach	68	54	14	135	0.3%
Orange	125	105	20	249	0.6%
Rancho Santa Margarita	81	107	-	188	1.1%
San Clemente	47	20	40	107	0.4%
Santa Ana	243	196	93	532	0.7%
Tustin	33	72	26	131	0.5%
Orange County Total	**2,922**	**2,654**	**1,299**	**6,875**	**0.6%**

Sources: RealtyTrack and Department of Finance, November 2015
Tabulations: GRC Associates, Inc., November 2015

Foreclosure and market sales prices in the 16 cities and countywide for the years 2014 and 2015 were gathered and are listed in Table 4-19. The housing market has been increasing at very good rates, while the foreclosure market has stabilized. Home prices have increased about five percent in Orange County within the past year. The following cities have had increases of more than double the five percent Orange County figure at 10 percent or more: Fountain Valley (15 percent), La Habra (11 percent), Lake Forest (11 percent), San Clemente (14 percent) and Santa Ana (10 percent).

Table 4-19: Foreclosure and Market Sales Prices, September 2014 & 2015

Cities	Foreclosure Sales Price - Sept 2014	Foreclosure Sales Price - Sept 2015	*All Homes Sales Price - Sept 2014	*All Homes Sales Price - Sept 2015	*All Homes Num. Sold Sept. 2015	Market Sales Price - % Change
Anaheim	$ 443,000	$ 446,500	$ 468,500	$ 485,000	250	3.5%
Buena Park	429,000	439,500	463,500	462,500	53	-0.2%
Costa Mesa	578,250	585,500	667,500	700,000	93	4.9%
Fountain Valley	504,000	555,000	600,000	687,500	53	14.6%
Fullerton	476,000	479,500	473,500	507,000	124	7.1%
Garden Grove	429,000	432,500	451,000	475,000	111	5.3%
Huntington Beach	559,500	587,750	655,000	719,000	231	9.8%
La Habra	475,000	475,000	425,000	470,000	64	10.6%
Lake Forest	227,014	320,000	587,000	650,000	98	10.7%
Mission Viejo	583,000	588,000	587,000	605,000	125	3.1%
Newport Beach	1,392,500	1,712,500	1,550,000	1,475,000	102	-4.8%
Orange	545,000	545,000	541,000	566,000	130	4.6%
Rancho Santa Margarita	574,980	580,000	478,250	455,000	64	-4.9%
San Clemente	755,050	810,000	752,500	860,000	73	14.3%
Santa Ana	368,000	373,500	405,000	445,000	167	9.9%
Tustin	282,000	425,500	531,250	572,500	74	7.8%
Orange County Total	**$ 520,000**	**$ 520,000**	**$ 584,000**	**$ 615,000**	**3,193**	**5.3%**

* All recorded home sales include sales of all single family residences and condominiums
Sources: RealtyTrack and CoreLogic, November 2015
Tabulations: GRC Associates, Inc., November 2015

5. Public Policies and Practices

Public policies may affect the pattern of housing development, availability of housing choices, as well as access to housing. This section of the AI reviews the various public policies that may impact fair housing choice in Orange County, including:

- General Plan Policies Affecting Housing Development
- Zoning Ordinance
- Building Codes and Occupancy Standards
- Affordable Housing Development
- Other Land Use Policies, Programs and Controls
- Zoning Regulations and Practices for Persons with Disabilities
- Local Housing Authorities
- Community Representation and Participation

A. General Plan Policies Affecting Housing Development

General Plan Housing Element

The Housing Element is one of seven state-mandated Elements of the General Plan. California housing element law, originally enacted in 1969, requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of their community. The most recent housing element for jurisdictions in the Southern California Association of Governments (SCAG) region, of which Orange County is a part, covers the 2014-2021 planning period.

Among the 16 cities participating in this AI, 14 have an adopted 2014-2021 Housing Element that has been found in compliance with state housing element statutes by the State Department of Housing and Community Development (HCD). Important criteria for State HCD approval of any housing element include a determination that the local jurisdiction's policies do not unduly constrain the maintenance, improvement, and development of a variety of housing choices for all income levels.

The following summarizes the status of the housing element in the two participating jurisdictions whose elements have not been found in compliance by HCD.

- The City of Fullerton adopted it 2014-2021 Housing Element on May 5, 2015. HCDs review letter indicated that while the Element met most of the statutory requirements, the Element could not be found in full compliance until the city completed Policy Action 1.1 to establish minimum densities and identify site capacity for 41 lower income units. Compliance is also

contingent upon implementation of Policy Action 4.4 to amend the Zoning Code to eliminate constraints to the provision of emergency shelters. The City is in the process of amending its Element to address State HCDs comments.

- The City of San Clemente adopted a Housing Element for the prior, 2008-2014 Housing Element cycle on July 5, 2011 which was found in compliance by HCD. The City is in the process of updating its Housing Element for the 2014-2021 planning period consistent with the City's new General Plan, and submitted a draft for HCD review in February 2016. Element adoption is targeted for spring of 2016.

California "no net loss" zoning law requires a local government to make a finding that a density reduction, rezoning, or downzoning is consistent with its Housing Element prior to requiring or permitting a reduction of density of a parcel below the density used in determining Housing Element compliance. The legislation also allows courts to award attorneys' fees and costs if the court determines that the density reduction or downzoning was made illegally.

General Plan Land Use Element

The General Plan Land Use Element serves as the foundation for all land use controls within a jurisdiction, and identifies the location, distribution and density/intensity of permitted land uses. As it applies to residential land uses, the Land Use Element establishes a range of residential, and oftentimes mixed use, land use categories; defines densities for each category (typically expressed in dwelling units per acre [du/ac]); and describes the housing types which typify each land use category.

Numerous factors, both market and governmental, affect the supply and cost of housing in a community. The governmental factor that most directly influences these market conditions is the allowable density range of residentially designated land. In general, higher densities allow developers to take advantage of economies of scale, reduce the per-unit cost of land and improvements, and reduce developments costs associated with new housing construction. Reasonable density standards ensure the opportunity for higher-density residential uses to be developed within a community, increasing the feasibility of producing affordable housing, and facilitating the provision of a greater range of housing types to address community needs.

Table 5-1 presents a summary of allowable densities by land use type for the 16 participating Orange County jurisdiction. While most jurisdictions have Land Use Elements that allow a range of single-family and higher density multi-family residential uses, several cities do not accommodate multi-family uses at a density greater than 25 units per acre without a density bonus or other incentive for affordable housing. Cities that limit densities within residential neighborhoods include: Buena Park, Costa Mesa, Orange, Rancho Santa Margarita, Santa Ana and Tustin. Most of these cities have instead chosen to direct higher density housing into areas designated for residential/commercial mixed use. For example, the City of Santa Ana eliminated the high density residential land use designation that supported its R-3 and R-4 zoning districts in an effort to facilitate long term neighborhood stabilization; the City's Land Use Element now directs higher density housing and mixed use development in proximity to transit services within District Centers and Urban Neighborhood areas. Just two jurisdictions - Fountain Valley and Ranch Santa Margarita - do not include provisions for commercial/residential mixed use in their Land Use Element or Zoning Codes.

Table 5-1: Typical Residential Land Use Designations

General Land Use Category	Density Range (units/ acre)	Typical Residential Type	Anaheim	Buena Park	Costa Mesa	Fountain Valley	Fullerton	Garden Grove	Huntington Beach	La Habra	Lake Forest	Mission Viejo	Newport Beach	Orange	Rancho Santa Margarita	San Clemente	Santa Ana	Tustin
Estate/ Very Low Density Residential	<2	Large lot, single-family, often in hillside or semi-rural setting	X								X			X		X		
Low Density Residential	0-7	Detached single-family dwellings, typically constructed in subdivisions	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Low Medium Density	7-15	Includes small lot single-family, duplexes, townhomes, mobile home parks, and lower intensity apartments and condominiums.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Medium Density	15-25	Multi-family apartments and condominiums, typically 2-3 stories	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
High Density	>25	Large multi-story apartment and condominium complexes	X			X	X	X	X	X	X	X	X			X	X	
Mixed Use	30+	Apartments, condominiums, live-work units, flats and artist-style lofts integrated with commercial uses	X	X	X		X	X	X	X	X	X	X	X		X	X	X

Source: General Plan Land Use Elements for Orange County jurisdictions.
Note: Table represents a summary of typical land use categories by density category, and does not represent a specific jurisdiction's General Plan Land Use designations. Instead, these categories are meant to provide an overview of the type of residential land uses and densities permitted in that jurisdiction.

B. Zoning Ordinance

The Zoning Ordinance implements the General Plan Land Use and Housing Elements by establishing zoning districts and development standards that correspond with General Plan land use designations. To supplement review of the Zoning Ordinance, staff from each of the 16 participating jurisdictions completed HUD's recommended Zoning Survey, which reviews Zoning and Planning Codes to identify land use and zoning regulations, practices and procedures that may result in the creation or perpetuation of an impediment to fair housing choice. The survey has a particular focus on practices that can act as barriers to the provision of housing for individuals with disabilities, and also touches on areas that may affect fair housing choice for families with children, or otherwise serve as impediments to full fair housing choice.

The completed HUD checklist *Review of Public Policies and Practices* for each participating jurisdiction is included in the Appendix to the AI. In summary, jurisdictions did not identify any public sector impediments to fair housing choice. Several jurisdictions did however identify actions to further fair housing, such as adding a definition of "disability" to the Municipal Code consistent with the Fair Housing Act. These specific actions are included in the Fair Housing Action Plan matrices provided in Chapter VIII of the AI.

Aspects of the zoning ordinance that may affect a person's access to housing or limit the range of housing choices available are further discussed below.

Variety of Housing Types

To ensure fair housing choice in a community, a community's Zoning Ordinance should provide opportunities for a variety of housing types to promote diversity to meet the needs of its residents. This includes zoning provisions for single and multi-family housing, secondary dwelling units, mobile and manufactured homes, licensed residential care facilities, supportive and transitional housing, emergency shelters, and single room occupancy units (SROs). Table 5-2 provides a summary of each jurisdiction's Zoning Ordinance as it relates to providing for these various housing types, and indicates if a given use is permitted or conditionally permitted in at least one zone district in the City.

Secondary Dwelling Units. Second units are attached or detached dwelling units that provide complete independent living facilities for one or more persons including permanent provisions for living, sleeping, cooking and sanitation. Second units may provide an alternative source of affordable housing for lower income households, particularly for seniors, persons with disabilities, and students, and typically rent for less than apartments of comparable size. These units can also assist older homeowners to remain in their homes, providing housing for caregivers and extended family members, and generating income for units used as rentals.

Table 5-2: Zoning for a Variety of Housing Types

Cities	Single-family	Multi-family	Second Units (in Single-Family Zones)	Mobile Home Parks	Manufactured Housing	Residential Care (1-6 clients)	Residential Care (>6 clients)	Supportive Housing[1]	Transitional Housing[1]	Emergency Shelters	Single Room Occupancy (SRO)
Anaheim	P	P	P	C	P	P	C	P	P	P	C
Buena Park	P	P	P	P	P	P	C	P	P	P	--[2]
Costa Mesa	P	P	P	C	P	P	C	P	P	P	C
Fountain Valley	P	C	P	C	P	P	C	--[3]	--[3]	P	C
Fullerton	P	P	P	P	P	P	C	P	P	P	C
Garden Grove	P	P	P	P	P	P	C	P	P	P	C[4]
Huntington Beach	P	P/C[5]	P	C	P	P	C	P	P	P	C
La Habra	P	P	P	P	P	P	C	P	P	P	C
Lake Forest	P	P	P	C	P	P	C	P	P	P	C
Mission Viejo	PD/P[6]	PD/P[6]	P	PD	PD	P	C	P	P	P	C
Newport Beach	P	P	MUP[7]	P	P	P/C[7]	C	P	P	P	C
Orange	P	P	P	C	P	P	C	P/C[8]	P/C[8]	P	--[8]
Rancho Santa Margarita	P	P	P	C	P	P	C	P	P	P	P
San Clemente	P	P/C[9]	P	C	P	P	C	P	P	P	P
Santa Ana	P	P	P	P	P	P	C	P	P	P	--[10]
Tustin	P	P	P	C	P	P	C	P	P	P	C[11]

P = Permitted Use PD = Planned Development Permit MUP = Minor Use Permit C = Conditional Use Permit

[1]For transitional and supportive housing, "permitted" means the jurisdiction treats these as residential uses under zoning, and only subject to the same provisions as other residential uses of the same type in the same zone.

[2]The Buena Park Zoning Code does not currently contain provisions for SROs. The City's 2013-2021 Housing Element includes an action to amend the Code within one year of adoption of the Housing Element to specifically address the provision of SRO units.

[3]The Fountain Valley Zoning Code does not currently specify provisions for transitional or supportive housing, but the City is in the process of amending the Code to treat as a residential use, as required under SB 2.

[4]The Garden Grove Zoning Code does not specify provisions for SROs. The City's 2014-2021 Housing Element indicates SROs are conditionally permitted as a boarding or lodging facility in R-2 and R-3 zones consistent with established development standards.

[5]The Huntington Beach Zoning Code currently requires a CUP for multi-family projects with more than 4 units (5-9 units - Zoning Administrator, 10+ units - Planning Commission). The City's 2013-2021 Housing Element includes an action to evaluate permit streamlining to include increasing the threshold for units in a project to be permitted by right, and increasing the threshold for projects requiring review by the Planning Commission.

[6]The Mission Viejo Zoning Code requires a planned development permit for single- and multi-family projects, except for projects in the RPD30a zone (Residential Planned Development By Right) which include 15-20% lower income units, as specified in the Housing Element.

[7]The Newport Beach Zoning Code limits occupancy of accessory dwelling units to persons age 55 and above. Licensed residential care facilities with 6 or fewer residents are a permitted use in residential zones, whereas as unlicensed facilities are subject to a CUP. SROs are classified under the Visitor Accommodation zoning classification.

[8]The City of Orange Zoning Code permits transitional and supportive housing with six or fewer occupants by-right in residential zones, whereas these housing types with more than seven residents are subject to a CUP. The City's Zoning Code does not currently contain provisions for SRO units.

[9]The San Clemente Zoning Code requires a CUP for multi-family projects with more than 4 units.

[10] The Santa Ana Zoning Code does not currently contain provisions for SRO units.

[11] The Tustin Zoning Code does not currently contain provisions for SRO units, but are conditionally permitted as boarding houses.

California law requires local jurisdictions to adopt ordinances that establish the conditions under which second units are permitted (Government Code Section 65852.2). No local jurisdiction can adopt an ordinance precluding second units in residential zones unless the ordinance contains findings acknowledging that prohibiting second units may limit housing opportunities in the region and result in adverse impacts on public health, safety, and welfare. An amendment to the State's second unit law in 2003 requires local governments to use a ministerial review process for second units, defined as a review and approval process that does not require public notice, public hearing or discretionary approval. Jurisdictions are permitted to impose standards on second units addressing issues such as building size, parking, height, setbacks and lot coverage.

As summarized in Table 5-2, 15 of the 16 participating Orange County jurisdictions have amended their Zoning Ordinances to permit second units by right in single-family residential zones. The City of Newport Beach, however, does not provide for second units within single-family zones in its Zoning Ordinance, but does allow for "granny units" (accessory, age-restricted units) in single-family zones. More specifically, the City's Code specifies that accessory units are intended for the sole occupancy of one or two adult persons who are fifty-five (55) years of age or older, do not exceed six hundred forty (640) square feet, and are subject to Zoning Administrator approval of a Minor Use Permit. The City's age-restrictions on accessory dwelling units, combined with the requirement for discretionary approval, may serve to impede housing choice for lower income individuals in Newport Beach.

Mobile Homes/Manufactured Housing. The manufacturing of homes in a factory is typically less costly than the construction of individual homes on-site thereby lowering overall housing costs. State law requires local governments to permit manufactured or mobile homes meeting federal safety and construction standards on a permanent foundation in single-family residential zones (Section 65852.3 of the California Government Code). State law also declares a mobile home park to be a permitted land use on any land planned and zoned for residential use, and prohibits requiring the average density in a new mobile home park to be less than that permitted by the Municipal Code. A city or county may, however, require use permits for mobile home parks. As presented in Table x, all 16 Orange County cities comply with these State requirements. While the City of Mission Viejo requires a planned development permit for manufactured housing, this is consistent with the City's requirement for all market rate single- and multi-family development.

Residential Care Facilities. The Lanterman Developmental Disabilities Services Act ("Lanterman Act" - Sections 5115 and 5116 of the California Welfare and Institutions Code) is that part of California law that sets out the rights and responsibilities of persons with developmental disabilities. The Lanterman Act impacts local zoning ordinances by requiring the use of property for the care of six or fewer disabled persons to be classified as a residential use under zoning. More specifically, a State-authorized, certified or licensed family care home, foster home, or a group home serving six or fewer disabled persons or dependent and neglected children on a 24-hour-a-day basis is considered a residential use that is to be permitted in all residential zones. No local agency can impose stricter zoning or building and safety standards on these homes. Due to the unique characteristics of larger (more than six persons) community care facilities, most jurisdictions require a Use Permit to ensure neighborhood compatibility in the siting of these facilities.

According to the California Department of Social Services, Community Care Licensing Division, there are 672 State licensed assisted living residential care facilities for the elderly, 258 adult residential facilities, 22 adult day care facilities, 49 children's residential group homes, and 10 residential small family homes in the 16 Orange County cities participating in this AI. As depicted in previous Table 3-28, which presents the numbers of residential care facilities by the 16 cities, the following cities have the highest numbers of residential care facilities by type:

- Assisted living residential care for the elderly located in Mission Viejo with 147 facilities, followed by Anaheim with 97 facilities;
- Adult residential facilities in Anaheim with 96 and eight adult day care facilities;
- Children's residential group homes in Orange with 11 homes, followed by Costa Mesa with 9 homes; and,
- Residential small family home for children with special needs in the City of Huntington Beach four homes.

All but one of the 16 participating jurisdictions have at least a dozen or more licensed community care facilities, with Rancho Santa Margarita currently having no such facilities. As presented in Table 5-2, all 16 cities have provided by-right zoning for licensed residential care facilities with six or fewer residents, treating these facilities as a single-family residential use. All cities also specify one or more zone districts where residential care facilities with seven or more residents may be permitted, subject to a conditional use permit; operators of care facilities may also pursue a reasonable accommodation to locate in additional zone districts. While the City of Newport Beach requires a use permit for unlicensed facilities regardless of size, requirements for by-right residential zoning under the Lanterman Act are only applicable to State licensed facilities.

Single Room Occupancy (SRO). Single Room Occupancy (SRO) residences are small, one room units occupied by a single individual, and may either have shared or private kitchen and bathroom facilities. SROs are rented on a monthly basis typically without rental deposit, and can provide an entry point into the housing market for extremely low income individuals, formerly homeless and disabled persons.

California Housing Element law requires jurisdictions to address the provision of housing for extremely low income (30% AMI) households, including SROs. The majority of the 16 Orange County cities either contain specific provisions for SRO units in their Zoning Ordinances, or have clarified in their Housing Elements how SROs are provided for under other zoning classifications. For example, the Housing Elements for Garden Grove and Tustin clarify that SROs are conditionally permitted through zoning as boarding houses. However, as indicated in the footnotes to Table 5-2, the cities of Buena Park, Orange and Santa Ana do not explicitly provide for SROs in their Zoning Codes, or clarify in their Housing Elements how such uses would be provided for, though the City of Buena Park has indicated SROs could be accommodated through a development agreement. Lack of clarity on provisions for SROs can serve to limit housing choice to extremely low income households, including persons with disabilities and veterans.

Emergency Shelters. An emergency shelter is a facility that provides temporary shelter and feeding of indigents or disaster victims, operated by a public or non-profit agency. State law requires jurisdictions to identify adequate sites for housing which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all income levels, including emergency shelters and transitional housing (Section 65583(c)(1) of the Government Code). Recent changes in State law (SB 2) require that local jurisdictions make provisions in the Zoning Ordinance to permit emergency shelters by right in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. Local jurisdictions may, however, establish standards to regulate the development of emergency shelters.

All 16 participating Orange County cities have complied with the requirement to permit emergency shelters by right within at least one zoning district. On November 17, 2015, the County Board of Supervisors approved the purchase of a warehouse in the City of Anaheim to build the county's first year-round, permanent emergency shelter for the homeless. The multi-service center is expected to house up to 200 people and act as a triage center where health, job and housing social workers would help homeless clients find permanent housing.

Transitional and Supportive Housing. State law (AB 2634 and SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing. Under Housing Element law, transitional housing means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and re-circulating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance (California Government Code Section 65582(h)).

Supportive housing means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (California Government Code Sections 65582(f) and (g)).

In summary, State law establishes transitional and supportive housing as a residential use and prohibits local governments from treating it differently from other similar types of residential uses (e.g., requiring a use permit when other residential uses of similar type in the same zone do not require a use permit). The majority of the 16 participating jurisdictions have amended their Zoning Codes to define and regulate transitional and supportive housing as a residential use as specified under State law. The City of Orange Zoning Code, however, only addresses transitional and

supportive housing structured in the form of group housing (which is permitted by right in all residential zones with 6 or fewer persons, conditionally permitted in R-3 and R-4 zones with seven or more persons); the Code does not specifically address transitional or supportive housing structured as an apartment building (which is permitted by right in multi-family zones). The City of Fountain Valley Zoning Code contains a definition of supportive housing, but does not currently specify how such uses are to be regulated; the City is in the process of amending the Code to treat transitional and supportive housing as a residential use, consistent with State requirements.

Definition of Family

A community's Zoning Ordinance can potentially restrict access to housing for relations failing to qualify as a "family" by the definition specified in the Zoning Ordinance. Even if the code provides a broad definition, deciding what constitutes a "family" should be avoided by cities to prevent confusion or give the impression of restrictiveness. Particularly, when Zoning Ordinance uses terms such as "single-family" homes, defining family in too detailed conditions may be viewed by some as restricting access to housing for certain segments of the population. According to California Housing Element Law, one of the ways communities can promote fair housing is to remove definitions of family that are restrictive.

Although a recent federal court case upheld the definition of a family in the zoning code, California court cases have ruled that an ordinance that defines a "family" as (a) an individual, (b) two or more persons related by blood, marriage or adoption, or (c) a group of not more than a certain number of unrelated persons as a single housekeeping unit, is invalid. California court rulings stated that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the city, and therefore violates rights of privacy under the California Constitution. A zoning ordinance also cannot regulate residency by discrimination between biologically related and unrelated persons.

None of the participating cities' Zoning Codes define the word "family" in a way that appears to have restrictive or discriminating effect, and place no limitations on how members of the family are related or the maximum number of member in the households. Several jurisdictions have removed the definition of family from their Zoning Codes entirely.

C. Building Codes and Occupancy Standards

Building codes were created to ensure the safety of buildings and residential structures. Many codes put in place were in response to the loss of life or property due to poor construction techniques or natural disasters (e.g., earthquakes or fires) from the past. It is unlikely that cities will relax housing codes; however, most of the 16 participating Orange County cities have housing rehabilitation programs that can assist lower income households ensure their homes are compliant with housing and building codes. In addition, each City implements a code enforcement program which works to correct code violations and respond to complaints from residents. Code enforcement is a critical component of retaining quality neighborhoods and residential structures.

Each of the participating cities have adopted the State Uniform Building and Housing Codes. These codes are considered to be the minimum necessary to protect the public health, safety, and welfare. No local amendment has either been initiated or approved that directly affects housing standards or processes. Each of the cities' building codes requires that new residential construction comply with the American with Disabilities Act (ADA) per federal law. ADA regulations include requirements for a minimum percentage of units in new developments to be fully accessible to the physical disabled.

Section 504 of the Rehabilitation Act of 1973 adds an additional layer of accessibility requirements for projects receiving federal funds, such as HOME or CDBG. In federally assisted new construction or substantially rehabilitated housing with five or more units, five percent of the units, or at least one unit, must be accessible for persons with mobility disabilities. An additional two percent of the dwelling units, or at least one unit, must be accessible for persons with hearing or visual disabilities. These units must be constructed in accordance with the Uniform Federal Accessibility Standards (UFAS), or a standard that is equivalent or stricter. UFAS generally defines an accessible housing unit as a unit located on an accessible route that can be approached, entered and used by individuals with disabilities.

Occupancy Standards

Local occupancy standards more stringent than those established by the State have been deemed unconstitutional by the courts; none of the 16 participating cities contain residential occupancy standards more stringent than the State. California jurisdictions are mandated to follow the minimum occupancy standards established under the State Uniform Housing Code (UHC). The UHC requires that every dwelling, except studio apartments, have at least one room with a minimum of 120 square feet of floor area. Two persons are permitted to use a room for sleeping purposes if it has a total area of not less than 70 square feet. When more than two persons occupy a room, the required floor area must be increased by 50 square feet per occupant. There is nothing in the Housing Code that prevents occupants from sleeping in the living or dining rooms, provided these rooms have an operable window or door meeting California building code requirements for emergency egress. The UHC is based on health and safety considerations, and is not intended to discriminate based on familial status.

Occupancy in housing receiving public funds, such as Section 8 rental assistance, is typically further regulated based on the number of bedrooms. Under the "two-plus-one" rule, maximum occupancy is based on two persons per bedroom plus one additional person.

D. Affordable Housing Development

Siting of Affordable Housing

Market rents are generally well above the level of affordability to lower income households in Orange County. Table 5-3 below summarizes the number of rent-restricted units in each of the 16 Orange County cities, and calculates the proportion of rent-restricted housing to each community's total stock of rental housing. As shown, while the number of affordable rental units varies significantly by jurisdiction, the proportion relative to each city's total rental housing is relatively consistent at between five and six percent. Just two cities fall below this percentage - Newport Beach (3.4%) and La Habra (4.0%). Thus, affordable rental opportunities are generally well dispersed within the 16 cities relative to each city's size.

Table 5-3: Affordable Rental Units

Cities	Rent Restricted Units	Total Rental Units	% Rental Housing Rent Restricted
Anaheim	3,333	50,800	6.6%
Buena Park	608	9,700	6.3%
Costa Mesa	1,436	24,000	6.0%
Fountain Valley	306	5,300	5.8%
Fullerton	1,164	20,500	5.7%
Garden Grove	1,321	20,100	6.6%
Huntington Beach	1,726	29,500	5.9%
La Habra	328	8,300	4.0%
Lake Forest	453	7,900	5.7%
Mission Viejo	369	7,400	5.0%
Newport Beach	579	17,200	3.4%
Orange	1,404	16,900	8.3%
Rancho Santa Margarita	242	4,600	5.3%
San Clemente	497	8,400	5.9%
Santa Ana	2,508	38,400	6.5%
Tustin	813	12,100	6.7%

Source: Rent restricted units derived from each City's Housing Element and Consolidated Plan, as updated by City staff. Number of rental units derived from 2008-2012 American Community Survey, rounded to the nearest 100.

Development Fees/Assessments

Local jurisdictions collect various fees on new residential development to recover the cost of permit processing, the costs of providing public services to the development, and to mitigate certain development impacts. Such fees typically include plan check and building permit fees, water meter fees, sewer connection fees, recreation taxes and school facilities fees. Multi-family development may also be subject to charges for various administrative or discretionary reviews, environmental review, and impact mitigation. When projects require multiple planning permit applications, such as a variance and conditional use permit, most cities place a cap on the combined fees.

Planning fees for the 16 participating Orange County cities are summarized in Table 5-4, and vary by the needs of each jurisdiction. Each city conducts periodic assessments of fees to ensure they reflect the actual cost of providing services.

Table 5-4: Development Fees

Cities	General Plan Amendment	Conditional Use Permit	Variance
Anaheim	$181/hr; $12,000 deposit	$181/hr; $10,000 deposit	$181/hr; $10,000 deposit
Buena Park	$1,400	$1,600	$525
Costa Mesa	$4,560	Minor: $1,050 Major: $1,550	$1,685
Fountain Valley	$9,265	$3,455	$2,960
Fullerton	$3,110	$3,110	$3,110
Garden Grove	$1,950	$2,100	Existing SF: $500 Other: $1,675
Huntington Beach	Minor: $24,890 Major: $46,580	ZA: $4,550 PC: $9,990	$4,230
La Habra	$4,000	$3,200	$3,200
Lake Forest	$10,000 deposit	$6,500 deposit	$6,000 deposit
Mission Viejo	$5,000 deposit	$2,500	$4,500
Newport Beach	$183/hr; $7,500 deposit	ZA: $2,420 PC: $5,000 deposit; $183/hr	$183/hr; $5,000 deposit
Orange[1]	FBHR +$3,000 deposit	FBHR +$1,000 deposit	FBHR +$1,000 deposit
Rancho Santa Margarita	$6,700 deposit	Minor: $3,650 deposit Major: $7,300 deposit	$8,000 deposit
San Clemente[2]	Deposit + 28% GP Update Fee	)eposit + 28% GP Update Fee	Deposit + 28% GP Update Fee
Santa Ana	$8,250	$4,900	$4,750
Tustin	$2,985 (text and map)	Minor: $665 Major: $3,000 deposit	Minor: $380 Major: $3,000 deposit

Source: Housing Elements for Orange County jurisdictions, as updated by City staff.
[1] *FBHR: Fully Burdened Hourly Rate*
[2] *Deposit determined by City Planner, with actual hourly costs consisting of time, materials, and overhead.*

E. Other Land Use Policies, Programs and Controls

Land use policies, programs, and controls can impede or facilitate housing development and can have implications for fair housing choice in a community. Density bonus and inclusionary housing policies can facilitate the provision of new affordable housing, whereas growth management programs and Article 34 of the California Constitution can impede new affordable housing development. The following section discusses land use policies, programs, and controls that may affect housing development and fair housing choice within the 16 participating Orange County cities.

Programs/Incentives to Develop Affordable Housing

Density Bonus and Other Incentives for Affordable Housing. California Government Code Section 65915 requires jurisdictions to grant a density bonus in exchange for the provision of affordable housing. In summary, applicants of residential projects of five or more units may apply for a density bonus and additional concession/incentive(s) if the project provides for construction of one of the following:

- 10 percent of units in a housing project for lower income households; or
- 5 percent of units in a housing project for very low income households; or
- A senior citizen housing development, or mobile home park that limits residency based on age requirements for housing for older persons; or
- 10 percent of units in a common interest development for moderate income households, provided that all units in the development are offered to the public for purchase.

The amount of density bonus to which the applicant is entitled ranges from 20-35 percent above the specified General Plan density, based on the percentage and affordability of units provided. In addition, eligible projects may receive one to three additional development concessions/incentives, based on the applicant demonstrating that it is not financially feasible to build the project without the concessions. The number of concessions a project may be eligible for is based upon a combination of the level of affordability and the percentage of affordable units, as presented in Table 5-5:

Table 5-5: Density Bonus Concessions

Level of Affordability	% Affordable Units	# of Development Incentives
Very Low Income	At least 5% At least 10% At least 15%	1 2 3
Low Income	At least 10% At least 20% At least 30%	1 2 3
Moderate Income (for-sale condo or planned development)	At least 10% At least 20% At least 30%	1 2 3

State density bonus law also specifies alternative parking standards which may be utilized at the request of the developer; use of these standards does not count towards a project's development incentives/concessions. These reduced parking standards are inclusive of guest parking and handicapped parking, may be tandem and/or uncovered, and are applicable to the entire development project.

- Zero to one bedroom: one on-site parking space
- Two to three bedrooms: two on-site parking spaces
- Four or more bedrooms: two and one-half on-site parking spaces

AB 2222 (effective January 2015), has made important changes to State density bonus law in an effort to help address potential displacement of existing tenants. Specifically, AB 2222 now prohibits an applicant from receiving a density bonus (and related incentives and waivers) unless the proposed housing development or condominium project would, at a minimum, maintain the number and proportion of affordable housing units within the proposed development, including affordable dwelling units that have been vacated or demolished in the five-year period preceding the application. AB 2222 also increases the required affordability from 30 years or longer to 55 years or longer for all affordable rental units that qualified an applicant for a density bonus, and requires replacement rental units to be subject to a recorded affordability restriction for at least 55 years. If the units that qualified an applicant for a density bonus are affordable ownership units, they must be subject to an equity sharing model rather than a resale restriction.

AB 744, signed into law in October 2015, further amends density bonus law to provide additional by-right reductions in parking for density bonus projects. Specifically, for density bonus projects which include the maximum percentage of low income or very low income units (20% and 11%, respectively) and located within one-half mile of a major transit stop with "unobstructed access[1]", upon the request of the developer, the jurisdiction shall not impose a vehicular parking ratio, inclusive of handicapped and guest parking, that exceeds 0.5 spaces per bedroom. Senior rental housing (as defined in Sections 51.2 and 51.3 of the Civil Code) and housing for special needs populations (as defined in Section 51312 of the Health and Safety Code) also qualify for by-right parking reductions when either paratransit service is provided, or unobstructed access to a fixed bus route service that operates at least eight times per day is available within one-half mile.

All 16 cities have adopted local density bonuses which implement state density bonus law. With the recent addition of anti-displacement provisions under AB 2222 and modified parking standards for transit-accessible projects under AB 744, all jurisdictions should update their ordinances to reflect these new State requirements.

[1] *A development is defined as having unobstructed access to a major transit stop if a resident is able to access the major transit stop without encountering natural or constructed impediments.*

Inclusionary Housing Programs. Inclusionary zoning is a tool that can be used by cities to integrate affordable units within market rate developments. One-third of cities and counties in California have adopted some form of inclusionary zoning, including ten in Orange County, requiring a stated percentage (typically 10 to 20%) of affordable units to be provided within newly constructed housing projects. The majority of these regulations allow for payment of a housing in-lieu fee as an alternative to providing the required affordable units on-site. The goal of inclusionary housing programs is to increase the supply of affordable housing proportionate to market-rate development, and to disperse affordable units throughout the community.

Among the 16 participating Orange County cities, the following currently have in place inclusionary zoning requirements to help address local affordable housing needs and contribute towards Housing Element production requirements:

- **Huntington Beach.** The City's Zoning Ordinance requires projects with three or more units to provide at least 10 percent of the total units for low to moderate income households. Affordable units are permitted to be provided at an off-site location (unless otherwise outlined as part of a specific plan project), and may be new construction, substantial rehabilitation, or preservation of assisted rental housing at-risk of conversion or mobile homes. Projects up to 30 units in size are permitted to pay an in-lieu fee.
- **Lake Forest.** The City has adopted Affordable Housing Implementation Plans (AHIPs) for four "New Neighborhoods" created from the rezoning of vacant business/industrial land. Each of the New Neighborhoods' land owners/developers has entered into a development agreement with the City which encompasses the AHIP, and reflects the City's policy to incorporate a minimum of 15 percent affordable units in new developments.
- **San Clemente.** Inclusionary Housing Program, adopted in 1980, requires developers of six or more units to set aside four percent of the total number of units for very low income households. This affordable requirement can be provided either on-site, off-site, or through the payment of an in-lieu fee or provision of land. In addition, the City established an Affordable Housing Overlay Zone along the El Camino Real commercial corridor in 2006, allowing for senior housing or mixed income housing with a minimum of 51 percent affordable to very low income households.
- **Santa Ana.** The City's Housing Opportunity Ordinance requires eligible housing development projects of 5 or more units to include at least 15 percent of the units as affordable to lower income households (rental) and at least 15 percent as affordable to moderate income households (ownership). The inclusionary requirement is triggered by: a request to increase the permitted density above that permitted in the zone, conversion of commercial or industrial land to residential uses, conversion of rental units to condominiums, and various other conditions.

Financial Assistance for Affordable Housing. The 16 participating Orange County cities have access to a number of financial resources which can provide critical gap financing in support of affordable housing development. As entitlement jurisdictions, the federal government provides annual allocations of Community Development Block Grant (CDBG), and for most jurisdictions, HOME funds. The State of California administers the Proposition 1C Housing Bond funds for a variety of

competitive housing programs. The State also administers federal tax credits and housing bonds allocated competitively throughout the state.

The primary local source of funds for affordable housing has traditionally been each Redevelopment Agency's Low- and Moderate-Income Housing Fund. With the passage of Assembly Bill (AB)1X 26, redevelopment agencies across California have been eliminated as of February 1, 2012, removing the primary local tool for creating affordable housing. However, with the passage of AB 1484 in June 2012, the Supplemental Educational Revenue Augmentation Funds (SERAF) borrowed by the State from Redevelopment Agencies Low and Moderate Income Housing Funds are to be repaid, and will be deposited into each Successor Agency's Housing Asset Fund (pursuant to Health and Safety Code Section 34191.4(b)(2)(B) and (C)).

Growth Management

Growth management programs facilitate well-planned development and ensure that the necessary services and facilities for residents are provided. However, a growth management program may act as a constraint if it prevents a jurisdiction from addressing its housing needs, which could indirectly impede fair housing choice. Among the 16 participating Orange County cities, only the City of Newport Beach currently has any form of growth control in place.

The Newport Beach City Charter (Section 423) requires voter approval of any project that increases density, intensity, or peak hour trip, above that provided for in the General Plan. Significance is quantified as 100 or more dwelling units, over 100 peak hour trips, or 40,000 or more square feet of nonresidential floor area. It is important to note, however, that Charter Section 423 does not have any impact on the allowed density established for the sites identified to meet the City's Regional Housing Needs Allocation (RHNA) in its 2014-2021 Housing Element, including affordable units.

A Growth Management Initiative was approved by the voters in San Clemente in 1986 which limited residential construction to 500 units per year and established a competitive allocation process. The Growth Management Ordinance expired on December 31, 2006 and was not extended.

Article 34

Article 34 of the State Constitution requires a majority vote of the electorate to approve the development, construction, or acquisition by a public body of any "low rent housing project" within that jurisdiction. In other words, for any projects to be built and/or operated by a public agency where at least 50 percent of the occupants are low income and rents are restricted to affordable levels, the jurisdiction must seek voter approval known as "Article 34 authority" to authorize that number of units.

In the past, Article 34 may have prevented certain projects from being built. In practice, most public agencies have learned how to structure projects to avoid triggering Article 34, such as limiting public assistance to 49 percent of the units in the project. Furthermore, the State legislature has enacted Sections 37001, 37001.3, and 37001.5 of the Health and Safety Code to clarify ambiguities relating to the scope of the applicability of Article 34 which now exist.

F. Zoning Regulations for Persons with Disabilities

Review of each city's zoning standards, policies and practices has not identified anything discriminatory against persons with disabilities, or that impedes the availability of housing for these individuals. Examples of the ways in which the cities facilitate housing for persons with disabilities include:

- Each City defines "family" or "single housekeeping unit" in such a way that does not have the effect of discriminating against unrelated individuals, or individuals with disabilities who reside together in a congregate or group living arrangement.
- Zoning Codes do not distinguish housing for persons with disabilities who are residing in a single housekeeping unit from any other residential use in which individuals are residing as a single housekeeping unit.
- Through reasonable accommodations, and in certain instances use permits, Zoning Codes permit disabled individuals not living as a single housekeeping unit to reside in residential zones where all other groups not living as a single housekeeping unit are prohibited.
- Each City's Building Code requires new residential construction to comply with the American with Disabilities Act (ADA) per federal law. ADA regulations include requirements for a minimum percentage of units in new developments to be fully accessible to the physical disabled.

Reasonable Accommodation

Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations in their zoning and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use a dwelling. Jurisdictions must grant variances and zoning changes if necessary to make new construction or rehabilitation of housing for persons with disabilities feasible, but are not required to fundamentally alter their Zoning Ordinance. For example, it may be a reasonable accommodation to allow covered ramps in the setbacks of properties that have already been developed to accommodate residents with mobility impairments.

If specific reasonable accommodation policies and procedures are not adopted by a jurisdiction, if a public hearing or discretionary action is required, or if a fee is charged to process a reasonable accommodation request, this may present an impediment to equal access to housing for residents with disabilities. The majority of the 16 participating Orange County cities have adopted formal procedures in their Municipal Code to process Reasonable Accommodation requests; the City of San Clemente currently considers such requests as they are made, and includes a program action in its Housing Element to adopt a formal reasonable accommodation ordinance by 2016. Three cities charge a fee (Anaheim, Tustin and La Habra), and one city requires a public hearing (Newport Beach). The AI includes recommended actions for each of these jurisdictions to modify these current practices to better facilitate housing opportunities to persons with disabilities.

G. Local Housing Authorities

Orange County's four housing authorities provide rental assistance through the Housing Choice Voucher Program (HCVP) to an estimated 16,486 households[2]. Thus, the authorities' fair housing policies affect the well-being of a significant number of renter households, most of whom are very low- and low-income families. The assisted tenant's are informed about fair housing rights and the services provided by the Fair Housing Council of Orange County (FHCOC), and the Fair Housing Foundation (FHF).

The housing authorities' policies contribute to attaining HUD's mandate to affirmatively further fair housing. If this mandate were not effectively carried out it would adversely impact thousands of very low and low income renter households. All four housing authorities are performing well, however. For example, HUD evaluates the performance of housing authorities through the Section 8 Management Assessment Program (SEMAP). This program measures the performances of public housing agencies (PHAs) that administer the HCVP in 14 key areas, including "Expand housing choice outside areas of poverty or minority concentration." All four housing authorities have received a "high performance rating" with SEMAP scores of 90 percent or greater. The Orange County Housing Authority has consistently received bonus points in SEMAP for de-concentration.

The paragraphs below summarize key fair housing policies of the housing authorities.

Anaheim Housing Authority (AHA)

The AHA 5-Year Plan for the Housing Choice Voucher Program contains a goal to expand housing opportunities by completing a survey of Section 8 landlords to establish an inventory of units that are accessible to the disabled. Another important goal is to ensure equal opportunity and affirmatively further fair housing by ensuring accessible housing to persons with all varieties of disabilities regardless of unit size required.

The Administrative Plan contains policies promoting fair housing and equal opportunity. Policies are established for nondiscrimination, for persons with disabilities, and improving access to services for persons with limited English speaking proficiency.

As noted in the Administrative Plan, Federal regulations prohibit discrimination against certain protected classes. State and local requirements, as well as PHA policies, prohibit discrimination against additional classes of people. The PHA shall not discriminate because of race, color, sex, religion, familial status, age, disability or national origin (called "protected classes").

Anaheim PHA Policy:

The PHA will not discriminate on the basis of marital status or sexual orientation.

[2] *This estimated figure includes approximately 6,263 household receiving HCVP assistance from the Orange County Housing Authority, 2,300 households from the Garden Grove Housing Authority, 1,761 households from the Santa Ana Housing Authority and 6,162 households receiving Section 8 or Project-Base Voucher Program assistance from the Anaheim Housing Authority*

The PHA will not use any of these factors to:

- Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to participate in the housing choice voucher program
- Provide housing that is different from that provided to others
- Subject anyone to segregation or disparate treatment
- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program
- Treat a person differently in determining eligibility or other requirements for admission
- Steer an applicant or participant toward or away from a particular area based any of these factors
- Deny anyone access to the same level of services
- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program
- Discriminate in the provision of residential real estate transactions
- Discriminate against someone because they are related to or associated with a member of a protected class
- Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons who are members of a protected class

Garden Grove Housing Authority (GGHA)

It is the policy of the Housing Authority to comply fully with all Federal, State, and local nondiscrimination laws and with the rules and regulations governing protected classes of the Fair Housing Act and Equal Opportunity in Housing and Employment.

The GGHA shall not deny any family or individual the equal opportunity to apply for or receive assistance under the HCVP on the basis of race, color, sex, religion, creed, national or ethnic origin, age, familial or marital status, handicap or disability, or sexual orientation.

To further its commitment to full compliance with applicable Civil Rights laws, the GGHA will provide Federal/State/local information to voucher holders regarding unlawful discrimination and any recourse available to families who believe they are victims of a discriminatory act. Such information will be made available during the family briefing session and all applicable Fair Housing Information and Discrimination Complaint forms will be made a part of the voucher holder's briefing packet. They also will be available upon request at the front desk.

All Housing Authority staff will be informed of the importance of affirmatively furthering fair housing and providing equal opportunity to all families; including providing reasonable accommodations to persons with disabilities as a part of the overall commitment to quality customer service.

Fair Housing posters are posted in the Housing Authority office lobby and the equal opportunity logo will be used on specific outreach materials. When available, staff will attend local Fair Housing update training sessions sponsored by HUD and other local organizations to keep current with new developments.

Santa Ana Housing Authority (SAHA)

The SAHA's Annual Plan states that it will take affirmative measures to ensure equal opportunity and affirmatively further fair housing. These measures include:

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability.
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability.
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.

Among the action steps taken to implement these measures are the following:

- Provide referrals to the Fair Housing Council of Orange County when the Housing Authority receives complaints of possible housing discrimination.
- Invite the Fair Housing Council of Orange County to make presentations to Authority staff regarding equal opportunities for fair housing (at least one presentation per year).
- Include fair housing information in all tenant briefing packets.
- Provide fair housing information and materials at all landlord training sessions.

Other activities to affirmatively further fair housing include:

- Counsel Section 8 tenants as to location of units outside areas of poverty or minority concentration and assist them to locate those units.
- Market the Section 8 program to owners outside of areas of poverty/minority concentrations.
- Awareness training will be provided to staff by representatives of the Fair Housing Council of Orange County.

Orange County Housing Authority (OCHA)

OCHA furthers the HUD strategic goal of ensuring equal opportunity for all Americans by undertaking affirmative measures to provide access to a suitable living environment in assisted housing regardless of race, color, religion, national origin, sex, familial status, or disability, in any bedroom size unit. Examples of specific affirmative measures are given below:

OCHA undertakes affirmative measures, initially at program briefings and again during annual re-certifications, to keep participant and applicant families advised of their civil rights regarding access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability. In addition, OCHA networks with over 180 community organizations and 31 participating cities to ensure awareness of and enforcement of fair housing laws. OCHA's Annual Plan is also consistent with Orange County's Consolidated Plan in furthering these objectives.

OCHA includes a Fair Housing brochure in all Briefing Packets, advising applicants and participants on how to file a fair housing complaint. The brochure includes the toll-free number for the Housing Discrimination Hotline: 1-800-669-9777, and the Federal Information Relay Service number: 800-877-8339. In addition, Fair Housing posters are printed in three Languages; English, Spanish and Vietnamese and are placed in OCHA's lobby for distribution.

OCHA affirmatively furthers fair housing by certifying to HUD that it will:

- Examine OCHA's programs and proposed programs
- Identify any impediments to fair housing choice within those programs
- Address those impediments in a reasonable fashion in view of the resources available
- Work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that requires OCHA's involvement
- Maintain records reflecting these analyses and actions

Additionally, OCHA implements the following policies for persons with disabilities:

- In accordance with rent reasonableness requirements, approve higher rents to owners that provide accessible units with structural modifications for persons with disabilities.
- Provide technical assistance, through referrals to the Fair Housing Council of Orange County, to owners interested in making reasonable accommodations or units accessible to persons with disabilities.

OCHA's Administrative Plan further explains its role in implementing laws and HUD regulations requiring OCHA to affirmatively further civil rights and fair housing in all federally-assisted housing programs. The letter and spirit of these laws are implemented through consistent policy and processes. The responsibility to further nondiscrimination pertains to all areas of OCHA's Housing Choice Voucher (HCV) operations. The Administrative Plan Fair Housing and Equal Opportunity rules and policies include:

- Nondiscrimination: Laws and regulations governing the responsibilities of OCHA regarding nondiscrimination.
- Policies Related to Persons with Disabilities: Rules and policies of the HCVP related to reasonable accommodation for persons with disabilities. These rules and policies are based on the Fair Housing Act (42.U.S.C.) and Section 504 of the Rehabilitation Act of 1973, and incorporate guidance from the Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ), issued May 17, 2004.

- Prohibition of Discrimination Against Limited English Proficiency Persons: Obligations of OCHA to ensure meaningful access to the HCVP and its activities by persons with limited English proficiency (LEP). This part incorporates HUD and DOJ's Notice of Guidance, published December 19, 2003 in the Federal Register.

H. Community Representation and Participation

It is important to provide residents various opportunities to express their concerns about fair housing issues through community involvement and representation. Information from the public provides first hand information on impediments to fair housing choice. As part of the community outreach for this AI, residents, community organizations, housing advocates, fair housing and social service providers, and City staff had numerous opportunities to voice concerns and receive information on fair housing. This was through community fair housing workshops, fair housing surveys, monthly AI Working Group meetings, and interviews with various organization and agencies.

In addition, each city offers a variety of ways to receive public input regarding housing issues. Residents can express their concerns through the following:

- **City Level**: City residents are given opportunities to provide their housing concerns at city councils and commissions, and in some cities, housing advisory boards have been established. Table 5-6 presents, some of the key public input opportunities by city.
- **County**: Orange County, through its Housing and Community Development Division encourages citizen involvement throughout the housing development process, from planning to implementation. Orange County's community participation process promotes involvement from residents of all income levels, persons with disabilities, homeless, minority groups, non-English speaking residents, and from different geographic areas within the County. The County hosts public meetings on a regular basis and provides timely notification and information regarding the purpose of these housing meetings in order to allow for full public participation.
- **Fair Housing Foundation**: Eleven of 16 participating cities contract with the Fair Housing Foundation (FHF) to address housing discrimination and other issues. According to the Foundation (in addition to providing services to address discrimination) the FHF conducts a comprehensive, extensive education and outreach program. The purpose of the program is to educate tenants, landlords, owners, Realtors and property management companies on fair housing laws. FHF conducts training sessions with tenants, provide staff booths at public events, and conduct community presentations.
- **Fair Housing Council of Orange County**: The Fair Housing Council of Orange County (FHCOC) provides fair housing services to five of the 16 participating cities. FHCOC provides comprehensive community education, individual counseling, mediation, advocacy and other services to try to eliminate housing discrimination.

Even though there are a variety of ways for the community to identify impediments to fair housing choice, there may be a need for improvement. Results of the AI housing surveys, shown in the

Chapter 2 Community Participation, indicate that many residents did not know where to go or who to contact regarding housing discrimination. Over one half (57%) of the respondents indicated that they encountered discrimination, mostly by landlord/property managers (88%). However, one-third of these respondents did not know what to do or where to go when discrimination occurs. Therefore, more information to the public and more opportunities for community involvement will further improve opportunities for fair housing choice.

Table 5-6: Community Outreach by Cities

Cities	Key Outreach Task
Anaheim	Anaheim has 4 Neighborhood Councils that assist in soliciting citizen input.
Buena Park	City has a Citizen's Advisory Committee to obtain input
Costa Mesa	Public meetings are regularly scheduled for the public
Fountain Valley	At least three public meetings are held each year at different times by the Housing Division of the City. Housing and Community Development Advisory Board encourages public participation
Fullerton	Minimum of two public hearings are held per year to respond to proposal and questions.
Garden Grove	Public workshops on housing include inviting service providers to help residents, including those with special needs
Huntington Beach	HB established the Citizen Participation Advisory Board to represent diverse views on various issues
La Habra	Established the Citizen Participation Committee to outline strategies and ensure citizen participation
Lake Forest	City contracts with the Fair Housing Council to work with the community on housing discrimination issues
Mission Viejo	Surveys, public meetings, hearings, and two commissions that address housing issues
Newport Beach	City has nearly 40 active boards, commissions and committees, including the Affordable Housing Task Force
Orange	City contracts with the FHF to assist in providing fair housing services.
Rancho Santa Margarita	City participation is welcome at regularly scheduled meetings, hearings and/or workshops
San Clemente	The Las Palmas Leadership Group has had results in obtaining input from underserved residents
Santa Ana	Regular public meetings are scheduled and encouraged at existing boards/commissions and ad hoc committees
Tustin	City's Citizen Participation Committee holds regularly scheduled public meetings and makes recommendations to City Council

6. Fair Housing Profile

Chapter 6 provides an overview of the institutional structure of the housing industry with regard to fair housing practices. In addition, this section discusses the fair housing services available to residents, as well as the nature and extent of fair housing complaints received by the City. Typically, fair housing services encompass the investigation and resolution of housing discrimination complaints, discrimination, auditing/testing, education and outreach, including the dissemination of fair housing information. Tenant/landlord counseling services are usually offered by fair housing service providers but are not considered fair housing.

A. Fair Housing Practices in the Homeownership Market

In 1996, HUD and the National Association of Realtors (NAR) entered into a Fair Housing Partnership. Article VII of the HUD/NAR Fair Housing Partnership Resolution provides that HUD and the NAR develop a Model of Affirmative Fair Housing Marketing Plan for use by members of the NAR to satisfy HUD's Affirmative Fair Housing Marketing regulations. Even so, discrimination still occurs in the housing market.

Homeownership Process

One of the main challenges in owning a home versus renting a home is the process. Buying a house takes considerably more time and effort than finding a home to rent. The major legal and financial implications surrounding the process also intimidate potential buyers. People can be overwhelmed by the unique terminologies, the number of steps required, and the financial considerations involved. The process is costly and fair housing issues could surface at any time during this process.

Real Estate Associations and Practices

National Association of Realtors

The NAR has developed a Fair Housing Program to provide resources and guidance to Realtors in ensuring equal professional services for all people. The term *Realtor* identifies a licensed professional in real estate who is a member of the NAR, however, not all licensed real estate brokers and salespersons are members of the NAR.

Article 10 of the NAR Code of Ethics provides that "Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin." A Realtor pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations on realtors and is a firm statement of support for equal opportunity in housing. A realtor who suspects discrimination is instructed to call the local Board of Realtors. Local Boards of

Realtors will accept complaints alleging violations of the Code of Ethics filed by a home seeker who alleges discriminatory treatment in the availability, purchase or rental of housing. Local Boards of Realtors have a responsibility to enforce the Code of Ethics through professional standards, procedures, and corrective action in cases where a violation of the Code of Ethics is proven to have occurred.

In addition, Standard of Practice Article 10-1 states that "REALTORS® shall not volunteer information regarding the racial, religious, or ethnic composition of any neighborhood and shall not engage in any activity which may result in panic selling. REALTORS® shall not print, display, or circulate any statement or advertisement with respect to the selling or renting of a property that indicates any preference, limitations, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin."

Realtor Fair Housing Declaration. In accordance with the Code of Ethics, each Realtor signs the following pledge, developed in 1996 as a result of the HUD-NAR agreement.

The Realtor agrees to:

- Provide equal professional service without regard to race, color, religion, sex, handicap, familial status, or national origin of any prospective client, customer, or of the residents of any community.
- Keep informed about fair housing law and practices, improving clients' and customers' opportunities and his/her business.
- Develop advertising indicating that everyone is welcome and no one is excluded, expanding his/her clients' and customers' opportunities to see, buy or lease property.
- Inform clients and customers about their rights and responsibilities under the Fair Housing Laws by providing brochures and other information.
- Document efforts to provide professional service, which will assist him/her in becoming a more responsive and successful Realtor.
- Refuse to tolerate non-compliance.
- Learn about those who are different and celebrate those differences.
- Take a positive approach to fair housing practices and aspire to follow the spirit, as well as the letter, of the law.
- Develop and implement fair housing practices for his/her firm to carry out the spirit of this declaration.

NAR also provides training on working with a diverse population. NAR's training program At Home With Diversity offers information about conducting business in culturally competent ways. It includes updated statistics, fair housing laws, business plan development, and business etiquette. At Home With Diversity addresses the topics of diversity, fair housing and business planning development, and teaches REALTORS® how to:

- Assess and understand attributes of diversity in local markets and their impact on the real estate industry
- Build a business plan and selling strategy to successfully service all client profiles
- Understand basic competencies to earn the confidence of potential buyers and sellers, regardless of race, ethnicity, religion, gender, handicaps, familial status, or national origin

California Association of Realtors

The California Association of Realtors (CAR) is a trade association of nearly 170,000 Realtors statewide. As members of this organization, Realtors subscribe to a strict code of ethics. Over the years, CAR's membership better reflects the changing demographics of a diverse state. Through its Leadership Summit meetings, it has grown to include the African American Economic Development Association of REALTORS® and Affiliates (AAEDARA), California Association of Real Estate Brokers (CAREB), National Association of Hispanic Real Estate Professionals (NAHREP), Asian Real Estate Association of America (AREAA), Chinese-American Real Estate Association (CAREA), Chinese Real Estate Association of America (CREAA), Chinese American Real Estate Professionals Association (CAREPA), Filipino American Real Estate Professionals Association (FAREPA), South Asian Real Estate Association of America (SAREAA), Korean Real Estate Brokers Association of Southern California (KREBA), Korean Association of REALTORS® and Lenders (KARL) and the Multicultural Alliance.

CAR has three meetings per year, which include sessions on fair housing issues. CAR directs outreach efforts Southern California area to underserved communities, State-licensed brokers, and sales persons who are not CAR members.

California Department of Real Estate (DRE)

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

DRE has adopted education requirements that include courses in ethics and fair housing. To renew a real estate license, each licensee is required to complete 45 hours of continuing education, including three hours in each of four mandated areas: Agency, Ethics, Trust Fund and Fair Housing. The fair housing course contains information that will enable an agent to identify and avoid discriminatory practices when providing real estate services to clients.

For the initial renewal on or after January 1, 1996, the law requires, as part of the 45 hours of continuing education, completion of four mandatory three-hour courses in Agency, Ethics, Trust Fund Handling and Fair Housing. These licensees will also be required to complete a minimum of 18 additional hours of courses related to consumer protection. The remaining hours required to fulfill the 45 hours of continuing education may be related to either customer service or consumer protection, at the option of the licensee.

Orange County Associations of Realtors

The Orange County Association of Realtors is generally the first line of contact for real estate agents who need continuing education courses, legal forms, career development and other daily work necessities. The frequency and availability of courses varies among these associations, and local association membership is generally determined by the location of the broker for which an agent works.

Complaints involving agents or brokers may be filed with this association. The monitoring of services by these associations is difficult as statistics on the education/services that the agencies provide or statistical information pertaining to the members is rarely available. Offices of the Orange County Association of Realtors are located at:

Laguna Hills
25552 La Paz Road
Laguna Hills 92653
Tel: (949) 586-6800
Fax: (949) 586-0382
http://www.ocar.org/#

Huntington Beach
8071 Slater Avenue, Ste. 240
Huntington Beach 92647
Tel: (714) 375-9313
Fax: (714) 375-9322

Pacific West Association of Realtors

The Pacific West Association of Realtors serves realtors in communities from Long Beach to northern Orange County. They provide many continuing education opportunities to members, including courses on the topics of ethics and professional conduct, trust funds, fair housing, and real estate agency. The Association also has trained mediators on staff that provide extensive mediation services for unresolved issues relating to financial disputes and fair housing issues. Realtors with fair housing questions, or who are in need of additional information, are usually referred to the California Association of Realtors. The Pacific West Association of Realtors also provides resource information on ethics and standards of practice.

B. Fair Housing Practices in the Rental Market

Similar to the homeownership market, a major challenge to ensuring fair housing in the rental market is the complexity of the process. There are several stages in the process of renting a home or apartment: 1) the advertising and outreach stage, 2) pre-application inquiries and responses, 3) the criteria for acceptance, 4) the lease and 5) administration of the lease. This section discusses these phases of the rental process. Although a potential homebuyer might face discriminatory practices primarily during the process of purchasing a home, a renter could confront housing discrimination not only during the process of renting but also throughout the tenancy.

Rental Process

Although the process of renting an apartment may be less expensive and burdensome up-front than the home-buying process, it may still be just as time-consuming. Potential renters might still face discrimination during the various stages of the rental process.

Advertising. The main sources of information are the internet, the realtor through the MLS, classified advertisements in local newspapers, word of mouth, and signs. The same types of discriminatory language previously described under the Homeownership Process may be used by landlords or apartment managers to exclude "undesirable elements."

Compliance with fair housing laws is difficult to monitor among the large number of small property owners. Outreach to this group is also difficult because many of these owners may not belong to the Apartment Owners or Apartment Managers associations, or do not actively participate in events/trainings offered by these associations. Advertising by small property owners may not always comply with the fair housing laws. For example, rental ads in local Spanish-language newspapers do not always appear in the English-language newspapers, as required by law.

Viewing the Unit. Viewing the unit is the most obvious place where potential renters could encounter discrimination because landlords or managers might discriminate based on race or disability, or judge on appearance whether a potential renter is reliable or might violate any of the rules. For example, a participant at a fair housing workshop conducted for this AI, indicated that a manager frowning on the presence of young children accompanying a viewer. Discrimination against families with children and people with disabilities is even more prevalent than racial discrimination.

Credit/Income Check. Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history/salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent. Many landlords often use credit history as an excuse when trying to exclude certain groups. Recent legislation provides for applicants to receive a copy of the report used to evaluate applications. In addition, applicants may also request a copy of their credit report (for a fee) to verify that the information used to approve/deny their application is accurate.

Lease. Most apartments are rented under either a lease agreement or a month-to-month rental agreement. A lease is favorable from a tenant's point of view for two reasons: the tenant is assured

the right to live there for a specific period of time and the tenant has an established rent during that period. Most other provisions of a lease protect the landlord. Information written in a lease or rental agreement includes the rental rate, required deposit, length of occupancy, apartment rules and termination requirements.

In a tight housing market, when a landlord can "financially afford" to choose tenants, the tendency is to offer shorter lease terms. In this case, a landlord might simply ask the "not-so-desirable" tenant to leave with a 60-day Notice to Vacate. Short-term leases also allow the landlord to raise rent more frequently.

Typically, the lease or rental agreement is a standard form completed for all units within the same building. However, the enforcement of the rules contained in the lease or agreement might not be standard for all tenants. A landlord might act in a discriminatory way and choose strict enforcement of the rules for certain tenants based on arbitrary factors, such as race, presence of children or disability. Because of the recent escalation of housing prices throughout California, complaints regarding tenant harassment through strict enforcement of lease agreements as a means of evicting tenants have increased.

Security Deposit. A security deposit is typically required to rent a housing unit. To deter "less-than-desirable" tenants, a landlord might ask for a security deposit higher than usual. Tenants could also face differential treatment when vacating the units. The landlord might choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear. A landlord might require that persons with disabilities with service animals pay an additional pet rent, a monthly surcharge for pets or a deposit, which is also a discriminatory act.

During the Tenancy. During tenancy, the most common forms of discrimination a tenant could face are based on familial status, race, national origin, sex or disability. Usually these types of discrimination appear in differential enforcement of rules, overly strict rules for children, excessive occupancy standards, and refusal to make a reasonable accommodation for handicapped access, refusal to make necessary repairs, eviction, notices, illegal entry, rent increases or harassment. These actions may be used as a way to force undesirable tenants to move on their own without the landlord having to make an eviction.

Rental Associations and Practices

California Apartment Association. The California Apartment Association (CAA) is the country's largest statewide trade association for rental property owners and managers. The CAA was incorporated in 1941 to serve rental property owners and managers throughout California. The CAA represents rental housing owners and professionals who manage more than 1.5 million rental units. Under the umbrella agency, various apartment associations cover specific geographic areas.

The CAA has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared toward improving the approach, attitude and professional skills of onsite property managers and other interested individuals. The CCRM program consists of 31.5 hours of instruction that includes training on fair housing and ethics issues.

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

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

C. Fair Housing Services

Fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling services involves informing landlords and tenants of their rights and responsibilities under the California Civil Code and mediating conflicts between tenants and landlords.

There are two private non-profit organizations that provide fair housing programs and services to Orange County residents. The Fair Housing Council of Orange County (FHCOC) and the Fair Housing Foundation (FHF) are the primary organizations providing fair housing services.

Fair Housing Council of Orange County

The Fair Housing Council of Orange County, which was established in 1965, provides fair housing service to the cities of Fountain Valley, La Habra, Lake Forest, Rancho Santa Margarita, and Santa Ana. Fair housing services include discrimination counseling, intake, investigation, and resolution, landlord/tenant fair housing counseling, mediations and training, certificate management training, community outreach, and fair housing education to cities. As part of the FHCOC's education and counseling service, its team provides one-on-one education, mediation, and counseling for individuals and families throughout Orange County and is a HUD Approved Housing Counseling Agency.

Fair Housing Council of Orange County
1516 Brookhollow Drive, Suite A
Santa Ana, CA 92705
714.569-0823 or 800.698.FAIR
FAX: 714.835-0281
http://www.fairhousingoc.org/

Fair Housing Foundation

The Fair Housing Foundation has provided programs and services for the elimination of housing discrimination, general housing assistance, and education and outreach activities to cities since 1964. Among the 16 cities participating in this AI, FHF provides fair housing services to the cities of Anaheim, Buena Park, Costa Mesa, Fullerton, Garden Grove, Huntington Beach, Mission Viejo, Newport Beach, Orange, San Clemente, and Tustin.

The objective of FHF is to affirmatively further fair housing in the City through a program comprised of services formulated to address the issues specific to their service cities. Those components include but are not limited to:

- General Housing counseling, mediations, unlawful detainer assistance, and referrals to tenants, landlords, managers, and rental property owners
- Discrimination counseling, complaint intake, in-depth testing, and resolution
- Audits of housing practices based on areas of concern uncovered through counseling and testing
- Education and Outreach services target specific areas and concerns. Education and training to Housing Consumers, and Housing Providers
- Workshops and presentations designed to educate the public on fair housing laws and issues
- Tester and other volunteer training
- Promoting media interest in eliminating housing violations

The FHF has two office locations:

Fair Housing Foundation
3605 Long Beach Boulevard, Suite 302
Long Beach, CA 90807
562-989-1206
800-446-3247
FAX 562-989-1836
http://www.fairhousingfoundation.com/

Fair Housing Foundation
600 W. Santa Ana Boulevard, Suite 214A
Santa Ana, CA 92701
714-918-8001
800-446-3247

D. Fair Housing Statistics and Trends

A key service provide by both the Fair Housing Council of Orange County and the Fair Housing Foundation is the handling of fair housing complaints filed by residents in their service cities. The following discussion summarizes the results of fair housing services provided by both organizations to each city in the Regional AI. Table 6-1 displays the number and type of fair housing cases for fiscal years 2012/13, 2013/14 and 2014/15.

As presented in Table 6-1, during the last three fiscal years, there were 254 discrimination cases in the 16 cities participating in the Regional AI. The City of Tustin, with a population of about 80,000, had the highest number of discrimination cases at 32, which represents 12.6 percent of the total discrimination cases in the 16 cities. This was closely followed by Garden Grove and Huntington Beach, both at 31 cases or 12.2 percent of the total cases. The City of Anaheim had 29 cases during the same three-year period and accounted for 11.4 percent of the total. Rancho Santa Margarita had no discrimination cases during the last three years.

A comparison of the types of discrimination cases shows that over one-half (53.9%) of the total cases were related to a person's disability -- including both mental and physical disabilities. The next highest number of discrimination cases were related to familial status, which includes the presence of children under age of 18 and pregnant women, comprising 21.2 percent of the total 254 cases. National origin and race were also frequent bases for alleged discrimination, representing 11.6 percent and 7.5 percent of all cases, respectively. As the table shows, there were no discrimination cases based on age or religion.

Of the 254 fair housing cases opened by the Fair Housing Foundation and Fair Housing Council of Orange County within the 16 cities during fiscal years 2012/13 to 2014/15, approximately 38 percent were found by investigation that discrimination did in fact occur. In slightly fewer cases (34.7%), the fair housing provider did not find sufficient evidence to indicate potential fair housing violations. Another one-quarter of the cases were inconclusive, with 2.8 percent pending an outcome.

Table 6-1: Discrimination Cases by Protected Class: 2012/13 - 2014/15

City	Age	Arbitrary	Disability	Familial Status	Gender	Marital Status	National Origin	Race	Religion	Sexual Orientation	Source of Income	Total	Percent
Anaheim	0	0	12	6	0	0	4	4	0	3	0	**29**	**11.4%**
Buena Park	0	0	10	2	0	0	0	3	0	1	0	**16**	**6.3%**
Costa Mesa	2	0	12	4	1	0	4	2	0	0	0	**25**	**9.8%**
Fountain Valley	0	0	2	1	0	0	0	0	0	0	0	**3**	**1.2%**
Fullerton	0	0	14	3	0	2	3	2	0	0	0	**24**	**9.4%**
Garden Grove	0	0	15	6	0	0	5	4	0	0	1	**31**	**12.2%**
Huntington Beach	0	0	23	6	1	0	0	0	0	0	1	**31**	**12.2%**
La Habra	0	0	3	4	0	0	1	1	0	0	0	**9**	**3.5%**
Lake Forest	0	0	1	0	0	0	0	0	0	0	0	**1**	**0.4%**
Mission Viejo	0	0	4	1	0	0	1	0	0	0	0	**6**	**2.4%**
Newport Beach	0	0	4	1	0	0	1	1	0	0	0	**7**	**2.8%**
Orange	0	0	6	3	0	0	3	0	0	0	0	**12**	**4.7%**
Rancho Santa Margarita	0	0	0	0	0	0	0	0	0	0	0	**0**	**0.0%**
San Clemente	0	0	3	2	0	0	3	0	0	0	0	**8**	**3.1%**
Santa Ana	0	1	11	3	0	0	4	1	0	0	0	**20**	**7.9%**
Tustin	0	1	17	11	0	1	1	1	0	0	0	**32**	**12.6%**
Total	**2**	**2**	**137**	**53**	**2**	**3**	**30**	**19**	**0**	**4**	**2**	**254**	**100.0%**

Source: Fair Housing Council of Orange County and Fair Housing Foundation

E. Tenant-Landlord Services

In addition to services directly related to fair housing, the Fair Housing Foundation (FHF) and Fair Housing Council of Orange County (FHCOC) provide services related to general landlord/tenant issues. Both landlords and tenants contact the FHF and FHCOC regarding a multitude of issues, such as lease terms, repairs and unlawful detainers. Each organizations' Housing Counselors resolve general housing inquiries through a variety of methods:

- **Counsel and resolve:** Well over 80 percent of all landlord or tenant calls are resolved without further referrals. Many client issues can be resolved through counseling by informing them of the law, civil codes, rights and responsibilities, and the remedies available to them
- **Unlawful Detainer Assistance:** Clients receiving Unlawful Detainers can contact the fair housing provider in their city, make appointments and receive assistance with completing their paperwork. Although FHF and FHCOC staff will not represent the client in court, agency staff will attend the Unlawful Detainer hearing and speak as a witness when requested.
- **Mediations:** The fair housing agencies also use mediations to resolve disputes. In mediation, agency staff acts as a neutral third party to facilitate dispute resolution between two disagreeing parties. In order to mediate, both parties must want the mediation and agree to enter into good faith resolution agreements.
- **Referrals:** Many clients contact their fair housing agency for problems not related to fair housing or general housing issues or require services not provided by the agency such as on-site health department reviews. In these cases, the agency provides referrals to other resources for assistance.

Table 6-2 provides a breakdown of the number of residents and landlords in the 16 participating cities provided with general housing counseling, mediation, unlawful detainer assistance and referral services over the past three years (2012/13 - 2014/15). Combined, the FHF and FHCOC handled over 24,000 complaints or requests for assistance, with the most prevalent issues as follows:

- Lease Terms - 25%
- Notices - 21%
- Repairs and Maintenance - 13%
- Security Deposits - 7%
- Unlawful Detainer - 6%
- Harassment and Retaliation - 5%
- General Information - 5%

Table 6-2: Tenant/Landlord Complaints and Inquiries 2012/13 - 2014/15

Issue	Total	Anaheim	Buena Park	Costa Mesa	Fountain Valley	Fullerton	Garden Grove	Huntington Beach	La Habra	Lake Forest	Mission Viejo	Newport Beach	Orange	Rancho Santa Margarita	San Clemente	Santa Ana	Tustin
Lease Terms	**6,013**	2,546	24	63	109	57	295	391	117	135	35	74	270	109	27	1,702	59
Notices	**5,174**	1,494	141	253	67	243	111	430	104	96	54	92	325	40	90	1,498	136
Repairs, Maintenance	**3,264**	1,101	112	174	63	196	225	333	59	28	52	85	215	21	49	755	96
Security Deposit	**1,600**	414	53	70	39	94	106	179	31	25	27	60	101	38	41	266	56
Unlawful Detainer	**1,345**	441	25	32	20	45	54	94	33	23	12	4	79	8	14	449	12
Harassment/Retaliation	**1,310**	336	35	58	21	57	63	101	20	10	17	25	76	14	18	413	46
Other, General Information	**1,171**	215	57	64	13	102	103	87	14	14	21	62	79	14	33	217	76
Rent Increase	**673**	164	24	44	7	51	48	47	8	10	7	25	63	13	23	110	29
Self-Help Eviction, Relocation	**582**	83	28	48	6	57	72	49	2	3	11	27	39	3	32	88	34
Nuisance	**501**	117	13	26	6	22	32	47	22	7	4	8	38	9	13	128	9
Entry by Landlord	**459**	147	9	6	12	18	5	48	8	10	4	13	33	21	4	113	8
Disability Accommodation	**449**	72	16	33	5	36	41	73	5	2	13	34	29	2	11	43	34
Reimbursement/Receipts	**325**	169			15			26	7	4			22	5		77	
Lockout	**251**	99	1	2	7	5	2	16	6	10	1		8	3		91	
Utilities	**234**	46	8	10	7	13	18	19	6	6		2	19	5	3	65	7
Discrimination	**168**	40	11	7	3	11	7	15	1	5	3	5	14		6	23	17
Late Fees	**140**	40	3	2		8	7	7	4	2		1	10	1	2	47	6
Housing Assistance Info	**140**	41	4	5	2	1	12	17	3	3	1	4	15	2	6	16	8
Pets	**130**	47	3	6	2	8	9	15	2		4	3	9	1		19	2
Parking	**128**	48	1	5		3	4	4	2	2	4		7	2		46	
Abandonment	**92**	20	6	6	4	3	14	4		2	2	3	9	1	1	13	4
Guests and Subtenants	**78**	31			3			5		1			5	1		32	
Personal Belongings	**77**	37			1			5	2	2			8	2		20	
Total	**24,304**	**7,748**	**524**	**914**	**401**	**1,030**	**1,228**	**2,012**	**456**	**400**	**273**	**527**	**1,473**	**358**	**373**	**6,231**	**639**

Source: Fair Housing Council of Orange County Quarterly Reports, Fair Housing Foundation Annual Reports. Compiled by Karen Warner Associates, Inc.
Data missing for cities for the following quarters: Anaheim (Q1 2013/14), La Habra (Q1 - Q4 2014/15)

F. Hate Crimes

Hate crimes are committed because of a bias against race, religion, sexual orientation, ethnicity, disability, gender, and gender identity. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting Program collects statistics on these incidents. Hate crimes provide insight into the context of discrimination occurring in a jurisdiction.

As presented in Table 6-3, based on the most recent five years of FBI hate crime statistics (2010-2014), all the 16 AI participating cities reported some level of hate crime. In total, 169 incidents of hate crime were reported in the 16-city AI region. Of the types of hate crimes (bias motivation), 57 incidents were related to race, 38 to religion, 37 to sexual orientation, 33 to ethnicity, and 2 to disability and 2 to gender identity. The Orange county Human Relations Commission reports that race/ethnicity continues to be the most common motivation for hate crimes (37%), followed by religion (29%). During the five year period, nearly 60 percent of the total 169 hate crimes in the 16 participating cities occurred within the following four jurisdictions: Huntington Beach (36 incidents), Santa Ana (31 incidents), Newport Beach (18 incidents), and Garden Grove (15 incidents).

Services for Hate Crime Victims

Both the State and County have programs providing assistance to hate crime victims. The Office of Attorney General has established an Office of Victims' Services that provides advocacy, support, educational and referral services. The aims of this Office are to help victims and their families understand their rights, help them get the support they need, and to guide them through the criminal justice system. The Office of Attorney General also has a Hate Crime Prevention Program Manager.

In 1991 the Orange County Human Relations Commission formed the Hate Crime Network to bring together representatives from law enforcement, community organizations, and the Orange County District Attorney, California Attorney General and the United States Attorney General's offices to facilitate the sharing of current hate crime issues. The Network is dedicated to creating a united voice against hate, developing resources for victims of hate, and building an appreciation of diversity in the community. Some of its objectives are:

- To Increase immediate and effective assistance to victims of hate.
- To address the under-reporting of hate crimes and hate incidents in our communities
- To build and develop collaborations between community organizations and law enforcement
- To educate communities about roots and trends of hate crimes and hate incidents

Periodic meetings of the Network are held and open to the public, listed on the OC Human Relations Calendar of Events http://www.ochumanrelations.org/hatecrime/hate-crime-victim-assistance-partnership/#sthash.0iI5GUKh.dpuf

The Orange County Human Relations Commission collects hate crime and incident data from law enforcement agencies, prosecutors, community organizations, and hate crime and incident victims. The data is then analyzed and compiled into an annual report, which is broadly disseminated to policy-makers, law enforcement agencies, community groups and educators throughout Orange County. The information presented in these reports allows all parties to better understand hate crime and incident trends; measure the outcome of their work; and, direct prevention campaigns in their communities or schools. The reports also serve to advise policy decisions and inform the development of services for victims of hate.

Table 6-3: FBI Hate Crime Statistics 2010-2014

City	Number of Incidents per Bias Motivation						Total
	Race	Religion	Sexual Orient.	Ethnicity	Disability	Gender Identity[1]	
Anaheim	3	1	2	1	-	-	**7**
Buena Park	2	-	3	3	-	-	**8**
Costa Mesa	2	2	2	2	-	-	**8**
Fountain Valley	2	1	2	-	1	-	**6**
Fullerton	-	-	1	-	-	-	**1**
Garden Grove	6	2	3	4	-	-	**15**
Huntington Beach	15	9	4	7	-	1	**36**
La Habra	5	1	1	-	-	-	**7**
Lake Forest	3	-	1	1	-	1	**6**
Mission Viejo	3	2	-	2	-	-	**7**
Newport Beach	-	12	3	3	-	-	**18**
Orange	3	3	1	2	-	-	**9**
Rancho Santa Margarita	1	1	-	-	-	-	**2**
San Clemente	1	1	1	1	-	-	**4**
Santa Ana	10	2	13	5	1	-	**31**
Tustin	1	1	-	2	-	-	**4**
Total	**57**	**38**	**37**	**33**	2	**2**	**169**

Source: FBI Uniform Crime Report, 2010-2014 Hate Crime Statistics

[1] *2013 was the first year FBI began tracking hate crimes based on gender identity.*

7. Progress Since 2010

This chapter summarizes private and public sector impediments identified in the prior AI and the region's progress in implementing actions to address these impediments. The continued existence of these impediments, along with the appropriateness of identified actions to be carried forward in the 2016-2020 AI are also evaluated.

The following two AIs are evaluated:

- Orange County Regional Analysis of Impediments to Fair Housing Choice 2010-2015
- Cities of Costa Mesa, Mission Viejo, San Clemente, and Tustin Analysis of Impediments to Fair Housing Choice 2010-2015

A. Status of 2010-2015 Orange County Regional AI Actions

The 2010-2015 Orange County Regional Analysis of Impediments to Fair Housing Choice (AI) identified the following private sector impediments:

- Housing Discrimination
- Discriminatory Advertising
- Denial of Reasonable Accommodation
- Hate Crimes
- Unfair Lending

These regional impediments have not been eliminated, and have thus been carried over into the 16 Orange County Cities Regional Analysis of Impediments for the 2015-2020 period. The following section summarizes the actions identified in the 2010-2015 Orange County Regional AI to address identified impediments, and the progress made by the Orange County Fair Housing Council in implementing these actions.

Housing Discrimination

Housing discrimination, especially in the rental housing market, is an impediment to fair housing choice. The Fair Housing Council of Orange County (FHCOC) opens an average of 50 cases on an annual basis for allegations of housing discrimination.

Actions to be Taken

1. Continue to process housing discrimination complaints filed by city and county residents.

2. Conduct testing of housing provider practices to determine whether there are differences in treatment based on a protected class.
3. Revise FHCOC website to provide direct access to a housing discrimination complaint form and provide an explanation of the process for investigating and resolving a complaint.
4. Revise FHCOC website to add more information on how residents can detect whether they have been victims of unlawful housing discrimination.
5. Publish a quarterly report on the FHCOC website summarizing the remedies pertaining to filed housing discrimination complaints.
6. Ensure that all jurisdictions provide a link to the FHCOC website.
7. Compile an Annual Report on housing discrimination complaints filed with the FHCOC, the DFEH and HUD, and transmit to participating jurisdictions.

Progress

- During the 2011/12 - 2014/15 period, the Fair Housing Council of Orange County (FHCOC) opened a total of 236 case files for allegations of housing discrimination in its client cities and the County.
- During the same time period, the FHCOC addressed housing-related inquiries from 15,137 unduplicated clients. These inquiries were screened for possible issued of housing discrimination and clients were provided counseling on their fair housing rights, obligations and remedies.
- During 2011/12 - 2014/15, FHCOC conducted 561 paired, on-site, systemic tests for discriminatory housing practices in both for-sale real estate brokerage transactions and rental housing transactions.
- FHCOC's website currently has an on-line contact form that can be used housing discrimination complaint reporting. The tool generates an e-mail to FHCOC. It is often used for complaints for other, non-discrimination, housing-related issues.
- FHCOC has received a grant under the HUD Fair Housing Initiatives Program (FHIP), Education and Outreach Initiative (EOI) that included $14,000 in funding for web site improvements. Work has begun and will include the improvements identified in the AI. These will include upgrades to help further differentiate between discrimination and non-discrimination complaints. Also, information regarding the process of investigating and resolving complaints will be added.

Discriminatory Advertising

Rental housing ads that state "no pets" or indicate rental discounts for seniors are impediments to fair housing choice because they make housing unavailable to disabled persons and the non-elderly. "No Section 8" ads may become an impediment to fair housing choice because they could make housing unavailable disproportionately to a protected class such as persons with disabilities.

Actions to be Taken

1. Encourage the Orange County Register to publish a Fair Housing Notice in the for rent classified ad section and to identify the FHCOC as an agency that can respond to fair housing questions. Encourage apartment rental websites to display more prominently their Fair Housing Notice.
2. Encourage the Los Angeles Times and Orange County Register to publish a "no pets" disclaimer that indicates rental housing owners must provide reasonable accommodations, including "service animals" and "companion animals" for disabled persons.
3. Support an amendment to the Communications Decency Act of 1996 to state no provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider, except for notices, statements, or advertisements with respect to the sale, rental, financing or insuring, or any other service of a dwelling that violate the Fair Housing Act.
4. Periodically review for rent and for sale ads published in the print media.
5. Prepare a summary of the accomplishments each year and transmit to the Urban County and participating cities.

Progress

- FHCOC periodically reviewed rental advertisements in the LA Times, the OC Register and other local weekly newspapers. This review did not find any overtly discriminatory advertisements, although ads were observed statements possibly presenting impediments, including stating 'no pets' without distinguishing that assistance animals would be allowed, or the use of phrases like 'active senior living' in advertising for senior housing that could discourage individuals with a disability. Additionally, many ads lacked any affirmative marketing language or symbols, such as the use of the phrase 'equal housing opportunity' or the display of HUD's 'equal housing' logo.
- FHCOC also periodically reviewed advertising for Orange County rentals listed on Craigslist for discriminatory content. Any discriminatory ads were either flagged as prohibited, responded to in order to inform the poster of possible discriminatory content, brought to the attention of Craigslist, or referred to FHCOC investigators for possible enforcement action. Problematic postings indicated restrictions with regard to children under the age of 18 or improper preference for seniors or 'older adults' for housing opportunities that did not appear to qualify as housing for older persons.
- Additional issues of potentially discriminatory content were found in postings in the roommates/shared listings. These typically dealt with religious, national origin, race or sexual orientation preferences or limitations. Given recent court decisions holding that such preferences might be permissible in shared housing situations, attempting to obtain correction or removal was a low priority of the FHCOC.

Denial of Reasonable Accommodation

Denial of a reasonable modification or reasonable accommodation is an impediment to fair housing choice because they account for almost one-fifth of all alleged discriminatory acts.

Actions to be Taken

1. Provide education and information on why this practice is unlawful to the owners and managers of apartment complexes and homeowner associations.
2. Provide information on the unlawful practice of denying reasonable modifications/reasonable accommodations at fair housing seminars conducted by the Apartment Association of Orange County.

Progress

- FHCOC responded to inquiries regarding reasonable accommodations and modifications, and directly assisted numerous clients to request and receive a reasonable accommodation or permission for a reasonable modification. In instances where clients were denied or effectively denied their requested accommodation, FHCOC assisted in them in filing an administrative housing discrimination complaint with the Fair Housing and Equal Opportunity (FHEO) Office of the U.S. Department of Housing and Urban Development.
- FHCOC provided training to rental property owners and managers through training seminars which addressed requirements for reasonable accommodations.
- FHCOC conducted fair housing seminars in cooperation with the Apartment Association of Orange County. The curriculum included discussion of reasonable accommodations and modifications.

Hate Crimes

Hate crimes committed at a residence are an impediment to fair housing choice because they impact the lives of 20-30 households per year. Almost one-half of all hate crime events in Orange County had an anti-Black or anti-Latino bias motivation.

Actions to be Taken

1. Coordinate with the Orange County Human Relations Commission, Center OC and the Orange County Victim Assistance Partnership.
2. Provide affected residents – when needed - with referrals to hate crime victim resources.

Progress

- On the rare occasion FHCOC is contacted by a victim of a hate crime occurring at their residence, the FHCOC refers them to the O.C. Human Relations Commission, while still possibly taking their fair housing complaint.

Unfair Lending

Disparities in the loan denial rates experienced by Hispanic and Black/African applicants create an impediment to fair housing choice as they have loans denied at rates 1.5 to 2.0 times greater than White applicants.

Actions to be Taken

1. Monitor the HMDA data annually using the 2008 HMDA analysis as a benchmark.
2. Complete a HMDA analysis of the top 10 lenders in Orange County to compare and contrast loan denial rates.
3. Conduct a follow-up analysis of loan denial rates at the neighborhood level to determine to what extent, if any, redlining may exist in Orange County. This follow-up will be completed when Census 2010 data are available on minority populations at the census tract level. The Census 2010 data will enable an analysis of loan activity and minority population characteristics for the same time period.
4. Conduct outreach to cultural, ethnic and minority organizations to potentially increase interest and readiness in home purchases.
5. Provide homebuyer education programs in neighborhoods with high denial rates, high minority population concentrations and limited English speaking proficiency to help increase loan approval rates.

Progress

- As part of its outreach efforts FHCOC informs individuals and organizations of its services, which include housing counseling for individuals seeking to become ready for a home purchase. FHCOC participates in numerous education and/or outreach activities, reaching a culturally and ethnically diverse audience, in which they inform participants of fair housing laws and of their counseling services.

ACTIONS TAKEN BY FHCOC TO AMELIORATE PUBLIC SECTOR IMPEDIMENTS

As part of the Fair Housing Action Plan developed in conjunction with the *Regional AI,* FHCOC will provide technical assistance to cities that have identified public sector impediments in the following areas:

- Family definition inconsistent with fair housing laws
- Lack of a definition of disability
- Lack of a reasonable accommodation procedure
- Lack of zoning regulations for special needs housing
- Lack of a fair housing discussion in zoning and planning documents
- Compliance with HUD AFFH requirements

The most common public sector impediments are:

- The zoning regulations do not define "disability".
- The zoning regulations do not define "supportive" and "transitional housing" as required by Government Code Section 65583(a)(5).
- Some cities have not adopted a reasonable accommodation procedure.
- The zoning regulations do not discuss housing for "special needs" populations.
- The zoning regulations do not discuss fair housing.

a. Definition of Disability

Question #3 asks: *Does the code or any policy document define 'disability', if at all, at least as broadly as the federal Fair Housing Act?*

Almost all cities do not define "disability." Those cities with an adopted reasonable accommodation procedure define disability in the procedure.

b. Supportive Housing

Question #5 asks: *Does the code limit housing opportunities for disabled individuals through restrictions on the provision of on-site supportive services?*

Government Code Section 65583(a)(5) requires local zoning to treat supportive and transitional housing as a residential use and subject only to those restrictions that apply to other residential uses of the same type in the same zone. For example, if transitional housing is a multifamily use proposed in a multifamily zone, zoning should treat transitional housing the same as other multifamily uses proposed in the zone. The purpose of Government Code Section 65583(a)(5) is to address the need for housing for the disabled.

The population to be served by supportive and transitional housing is people with different kinds of disabilities. Actions by the entitlement cities and Urban County to provide zoning regulations will eliminate a potential impediment to the development of such housing.

c. Reasonable Accommodation Procedure

Question #7 asks: *Does the jurisdiction have, either by ordinance or policy, a process by which persons with disabilities can request reasonable accommodations (modifications or exceptions) to the jurisdiction's codes, rules, policies, practices, or services, necessary to afford persons with disabilities an equal opportunity to use or enjoy a dwelling?*

Many cities have not yet adopted a reasonable accommodation procedure. Cities without an adopted procedure have stated in their housing elements that they intend to enact such a procedure pursuant to the requirements of state law.

d. Special Needs Zoning

Question #20 asks: *Does the zoning code or other planning document address housing for "special needs" populations.*

Most cities answered this question in the affirmative. However, the documents addressing special needs housing was typically a housing element and not the zoning code. Consequently, most cities do not have zoning regulations that describe development standards for special needs populations such as: homeless people, victims of domestic violence, people with disabilities, and people living with HIV/AIDS, all of whom have direct fair housing implications.

Entitlement cities and the Urban County should consider enacting special needs housing zoning regulations.

e. Fair Housing Discussion

Question 24 asks: *Does the zoning ordinance or other planning or policy document include a discussion of fair housing?*

Most cities answered this question in the affirmative. However, the document discussing fair housing was typically a housing element and not the zoning code. Consequently, most cities do not have zoning regulations that discuss fair housing.

Entitlement cities and the Urban County should consider enacting fair housing zoning regulations.

ACTIONS TO BE TAKEN BY THE FHCOC AND CITY TO AMELIORATE OR ELIMINATE PUBLIC SECTOR IMPEDIMENTS.

a. Actions to be Taken by the FHCOC

The FHCOC will provide technical assistance to cities that have identified public sector impediments in the following areas:

- Family definition inconsistent with fair housing laws
- Lack of a definition of disability
- Lack of a reasonable accommodation procedure
- Lack of zoning regulations for special needs housing
- Lack of a fair housing discussion in zoning and planning documents
- Compliance with HUD AFFH requirements

The technical assistance will consist of providing background information on the above impediments and model ordinances or regulations that adequately address the fair housing concerns posed by the impediments.

B. Status of 2010-2015 Sub-Regional AI Actions

(Cities of Costa Mesa, Mission Viejo, San Clemente, and Tustin)

Identified Impediments

The Sub-Regional AI identified the following impediments to fair housing choice in the four cities:

- Areas of racial/ethnic concentrations in each City indicate that residential patterns are evident; however, they do not indicate the reasons behind the patterns. Given that many of the ethnically concentrated areas do not overlap the low- and moderate-income areas, the trends are likely related to other factors. Each of the Cities may need to target these areas with fair housing services, education/outreach, and/or additional testing to ensure that these patterns are related to individual preferences and not a discriminatory force within the market.
- Residents who speak Spanish at home represented the majority of linguistically isolated households in each jurisdiction. These language barriers may prevent residents from accessing services, information, housing, and may also affect educational attainment and employment needed to earn higher incomes.
- Analyzing tenure by race indicates that minorities are significantly underrepresented in the ownership market.
- When looking at overcrowding by race and ethnicity, the 2000 Census shows that the percentage of overcrowded households is significantly higher for Hispanic households, though it is unclear if this is a cultural preference, result of socio-economic status, or intentional discrimination.
- Housing designated for persons living with AIDS is scarce and many of these people encounter discrimination (based on interviews with service providers). In addition, complaints involving bias against persons with disabilities, denial of reasonable accommodations, and the availability of accessible housing is a growing concern.
- The housing stock contains a significant amount of older units that may potentially contain lead-based paint. In addition, lower income households tend to live in the older housing stock since it is more affordable. While there were relatively few cases of elevated blood levels reported during the last five years, all of the cases involved children of Hispanic ethnicity. Given this group also reported earning lower incomes, outreach and education efforts may need to be expanded to include Hispanics and residents in the low- and moderate-income areas.
- Given the demographics of each City, Asians appear underrepresented as there were no complaints received by the fair housing service providers from this group in any of the four Cities (with the exception of one complaint from San Clemente). Yet, it is difficult to

determine the significance of this trend, because of the large number of complaints that declined to state their race/ethnicity in each City.

- Discrimination based on Disability (physical and mental), Race, and Familial Status constituted the majority of complaints received by the fair housing service provides within each City. These categories also represented the majority of protected classes of cases filed with HUD, FHEO, and DFEH. Moreover, there was a consistent pattern of the top three allegations including eviction, denial of a reasonable accommodation and unequal terms. These topics may need to be emphasized in outreach efforts and/or targeted to landlords through literature. Bias against physical and mental disability, familial status, sex, race, and retaliation should also receive focus in education and outreach materials.
- Bias against race and/or ethnicity appears to be the biggest motivator of hate crimes within each of the four Cities.
- While each City has tried to provide for the accommodation of affordable housing, residents have sought to block affordable housing developments due to not in my backyard (NIMBY) sentiments; several of which involved Homeowner's Associations (HOAs).
- While most of the impediments listed in previous AI's do not appear to still exist in each of the four Cities, fair lending and education and outreach services pertaining to fair housing laws (especially to immigrant populations) does continue to be a need in each jurisdiction.
- The disparate impact of credit scoring and loan approval rates (since the use of credit scores are still widely used in lending) also appears to remain a concern since the last AI.
- The pattern of Whites having higher approval rates than minority groups has not changed since the last AI and Hispanics represented a significant portion of loan applications received with substantially lower approval rates in each City.
- Lack of advertising by lenders in particular neighborhoods is one area which may be of concern due to the lack of home purchase loan applications received by African Americans and Hispanics.
- The current housing market has resulted in many new concerns that were not present during the last AI, which may provide opportunities for additional incidents of discrimination including: foreclosures, loan modifications, short sales, and real estate owned (REO) properties that have flooded the market.

Proposed Actions to Address Identified Impediments

The following actions were proposed in the Sub-Regional AI to address identified impediments to fair housing choice. A summary of the Fair Housing Foundation and the four partner cities progress made in implementing these actions is identified after each.

Action 1: Each City should consider providing a Housing Page on its website that provides links to the fair housing service provider and other agencies that provide related services. Access to program information in Spanish should also be provided or links to agencies that provide information in Spanish, such as OCAR's link to agents who speak various languages, DRE's Spanish webpage, and

HUD's Spanish webpage. *[This will address impediments involving language barriers, access to information, racial disparity in the ownership and lending markets, NIMBYism, and disproportionate complaints.]*

Timeframe: By the end of FY 2010-11, and annually thereafter.

Progress: The Cities of Tustin, San Clemente, Costa Mesa, and Mission Viejo have updated their websites to provide information regarding education opportunities and links to the Fair Housing Foundation (FHF). Information was also provided in Spanish in Costa Mesa. The FHF has reported that during this Consolidated Plan period, 17,754 hits to their website have been received, and as of current, they have 187 Facebook, and 65 Twitter followers.

Action 2: Each City should explore ways to collaborate with local lenders (especially the top ten), real estate agents, and special networks for Hispanic, African American and Asian professionals within these groups to develop and expand marketing efforts for services provided by each group within each of the low- and moderate-income and racial/ethnic concentrated areas. Collaborative efforts should ensure that various racial/ethnic groups have access and knowledge of City programs, supportive services, and provide for networking opportunities with these groups such as a housing fair or similar event. Services providers for those with special needs, especially the disabled and those living with HIV/AIDs, should also be included. *[This will address impediments involving language barrier, access to information, racial disparity in the ownership and lending markets, and problems faced by those with special needs.]*

Timeframe: By the end of FY 2010-11, and annually thereafter.

Progress: FHF has provided fair housing trainings throughout the sub-region and currently provides trainings for landlords, managers, realtors, and other housing providers on a regular basis. The FHF regularly reaches out to real estate boards, property owner associations, and offers fair housing trainings for their members. The general types of trainings conducted for housing providers are:

Landlord Workshops - A two-hour training geared toward property owners and managers that covers the Federal and State Fair Housing Laws, the rental process, selection criteria, rental agreements, rules and regulations, obligations and guidelines regarding late fees, security deposits, rent increases, and termination. The training also covers specific concerns regarding families with children, occupancy standards and reasonable accommodations and modifications.

Certificate Management Trainings – A four-hour intensive training geared towards property owners, managers, management companies and real estate professionals that covers a detailed overview of the Fair Housing Laws, general guidelines, families with children, lead disclosure, occupancy limits, reasonable regulations of facilities, people with disabilities, sexual harassment, advertising guidelines, prohibited practice and hate crimes. A question and answer session follows the training.

Disability Policy Workshop- A two-hour training geared towards housing providers, which covers the basics of what needs to be addressed in a property's disability policy. The training discusses property

accessibility, reasonable accommodations and modifications, accessibility policies, and disability discrimination.

Action 3: Each City should continue to collaborate with their fair housing service provider and include testing/audits within the contractual work scope of each agreement. In addition, each City should review their agreements annually to make sure that increased and comprehensive services are being provided each year, and that education and outreach efforts are expanded and affirmatively marketed in the low- and moderate income and racial/ethnic concentrated areas. *[This will address impediments involving racial disparities, discrimination complaints, and unexplained trends in residential patterns.]*

Timeframe: By the end of FY 2010-11, and annually thereafter.

Progress:

- Through counseling and case management, the Fair Housing Foundation has identified that in addition to complaints on familial status, more prevalent in the sub-region are complaints regarding disability, specifically in the form of denying reasonable accommodations for perspective tenants with physical disabilities. While provisions for audit services were not always available to address this issue, the Fair Housing Foundation did open nearly 100 bonafide discrimination cases within the sub-region since 2010 which were investigated through on site testing, document review, and surveys. Most complainants were in place tenants, of lower income, and Latino.
- When there was provision for audits and testing, or when the number of cases opened and investigated fell short of the annual performance goal, the FHF conducted discrimination and educational audits and workshops to address the most common concerns found in the housing industry. For Mission Viejo specifically, the FHF conducted 7 audits on physical disability and reasonable accommodations and concluded that one of the seven audits had evidence to support the discrimination allegation.
- Educational audits were conducted by randomly selecting housing providers and asking them to complete questionnaires based on the three most alleged protective classes: Disability, Race, and Familial Status. Of the 15 housing providers who participated in the educational audit, most were knowledgeable in all areas of the questionnaire.
- The Fair Housing Foundation held several Accommodation & Modification 101 workshops for housing providers. The workshop covered the following topics:
    - Overview of protected classifications
    - Definition of disability, life activities, and impairments
    - Modifications and accommodations
    - Examples of common accommodations and modifications
    - Important data needed o verification forms
    - Approval notices
    - Denial of request for accommodations/modifications

- Construction requirements and accessibility
- Hoarding

Action 4: Several entities exist in Orange County that assist with fair housing and related issues, including, but not limited to: Orange County Human Relations, the Public Law Center, Legal Aid Society, and the Center Orange County. Each City should consider increasing collaborative efforts with these and similar groups to expand education and outreach efforts and increase the diversity of services provided. *[This will address impediments involving racial disparities, discrimination complaints, and unexplained trends in residential patterns.]*

Timeframe: By the end of FY 2010-11, and annually thereafter.

Progress: Due to a lack of funding, the four cities in the sub-region did not have an opportunity to collaborate with the Orange County Human Relations, the Public Law Center, Legal Aid Society, or the Center Orange County**.** However, the cities contracted with the Fair Housing Foundation to provide education and outreach to both housing providers and consumers in their cities. A component of these services is providing referrals, when necessary, to these organizations, as well as to the California Department of Fair Employment and Housing and HUD.

Action 5: Each City should increase education and outreach efforts related to the home buying process to increase knowledge of how credit history, debt-to-income ratios, collateral, and cash needed to close affect a person's ability to successfully qualify for a loan. Information on down-payment assistance programs available should be included as well. Given that Hispanics are the group most affected in each of the cities and represent the second largest proportion of each City's population, information should be made available in Spanish. *[This will address impediments involving language barriers, access to information, impediments involving racial disparities in the ownership and lending markets.]*

Timeframe: By the end of FY 2010-11, and annually thereafter.

Progress: Due to the loss of significant revenue (e.g., redevelopment) and continued reductions in HUD funding, three of the four cities in the sub-region did not carry out any education or outreach efforts related to home buying or down payment assistance. In past years, education and outreach efforts had been conducted in conjunction with the City's redevelopment-funded homebuyer assistance program. The City of Tustin, however, did provide education to 46 households that received down payment assistance from nonfederal funds since 2010.

Action 6: Each City should continue to affirmatively market their first-time homebuyer and housing rehabilitation programs if already doing so, and/or expand their efforts to include programs available through the County and private sector to residents in the low and moderate-income and racial/ethnic concentrated areas. In addition, outreach efforts should be expanded to include Hispanics, elderly, large, and disabled households, as they represented a significant proportion of households reporting problems. *[This will address impediments involving racial disparities and housing problems.]*

Timeframe: By the end of FY 2010-11, and annually thereafter.

Progress: Each city's ability to fund and hence, affirmatively market, affordable housing programs, such as a first-time homebuyer or housing rehabilitation program has been limited due to the elimination of Redevelopment Agencies in California which provided leverage funding for these programs. Continual annual reductions in HOME entitlement funds, also make it challenging to effectively administer these programs. However, the sub-region had these accomplishments to report for Action 6:

- Costa Mesa affirmatively marketed their HOME-funded owner-occupied rehabilitation program and assisted 108 households of diverse ethnicity, age, size, and physical ability since 2010.
- Since 2010, Mission Viejo affirmatively marketed their owner-occupied rehabilitation program and was successful at funding 62 loans and grants to eligible households.
- Since 1994, the City of San Clemente has marketed and operated a CDBG-funded single-family rehabilitation loan program. The program, offering up to $15,000 to owners for home improvements, is advertised in the City's quarterly magazine, which is mailed to over 31,000 residents and businesses in the city, and is publicly noticed in the city's local newspaper.
- The City of Tustin assumed responsibility for marketing 262 affordable rental units at Tustin Legacy to low and moderate income households. Tustin also collaborates with the Orange County Housing Authority to provide 347 senior, disabled, and lower income households with housing assistance vouchers through the County's Section 8 program.

Action 7: Each City should continue to collaborate or expand efforts with various property management companies, mobile home parks, and Homeowner Associations (HOA's) to ensure that each is knowledgeable of fair housing laws, services, education opportunities, and City-funded programs. Emphasis on discrimination toward the categories of Disability (mental, physical, and persons living with HIV/AIDS), Race, and Familial Status (single parents, children, and issues with lead-based paint) should be included as well as discriminatory acts of eviction, denial of a reasonable accommodation, and unequal terms. *[This will address impediments involving racial disparities, discrimination complaints, housing problems faced by those with special needs, and NIMBYism. It will also get more groups involved in the fair housing process.]*

Timeframe: By the end of FY 2010-11, and annually thereafter.

Progress: Each city in the sub-region contracts with the Fair Housing Foundation to offer a comprehensive fair housing program to their residents. FHF provides fair housing trainings throughout the City and currently provides trainings for landlords, managers, realtors, and other housing providers on a regular basis. There are several types of trainings offered including landlord workshops, Certificate Management Training Seminars and Realtor trainings.

- Landlord Workshops - A two-hour training geared toward property owners and managers that covers the Federal and State Fair Housing Laws, the rental process, selection criteria, rental agreements, rules & regulations, obligations & guidelines regarding late fees, security

deposits, rent increase, termination, etc. The training also covers specific concerns regarding families with children, occupancy standards and reasonable accommodations and modifications.

- Certificate Management Trainings –A four-hour intensive training geared towards property owners, managers, management companies and real estate professionals that covers a detailed overview of the Fair Housing Laws, general guidelines, families with children, lead disclosure, occupancy limits, reasonable regulations of facilities, people with disabilities, sexual harassment, advertising guidelines, prohibited practice and hate crimes. This training also includes a "What would you do?" session with specific Fair Housing scenarios discussed in a group forum.
- Realtor Trainings – A four-hour training geared towards Realtors that covers a summary of the Fair Housing Laws, general guidelines, policies and practices, equal treatment needs and examples and guidelines to showing properties.

Additionally, the FHF has conducted and continues to offer a Fair Housing 101 and Reasonable Accommodations and Modifications workshops, and conducts educational surveys and audits in the areas of the most common protected classes: Disability, Familial Status, and Race.

8. Fair Housing Plan

The Orange County 16 City Analysis to Fair Housing Choice (AI) evaluates a wide range of private and public sector housing issues and potential barriers to fair housing. This chapter builds upon the previous analysis, summarizes conclusions and presents a list of recommendations to help address the impediments. **The Fair Housing Action Plan (Table 8-1) is provided at the end of this Chapter: only those actions pertinent to a specific jurisdiction are included in each city's individual Fair Housing Action Plan.** Periodically, during the Consolidated Plan Annual Action Plan and Consolidated Annual Performance Evaluation Report (CAPER) processes, individual jurisdictions may adjust their Fair Housing Action Plan depending on funding availability and progress and effectiveness in implementing the actions.

A. Regional, Private Sector Impediments Carried Over from 2010 Regional and Subregional AI

1. Housing Discrimination

Impediment A-1: Housing discrimination continues to exist throughout Orange County, as evidenced by the number of complaints and fair housing cases opened by the Fair Housing Foundation and Fair Housing Council of Orange County. An average of 85 cases were opened in the participating cities over the past three years, with the leading bias based on disability (physical and mental), followed by familial status, national origin and race**.**

Recommendations for All Jurisdictions:

- In partnership with each city's fair housing provider, conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach should include workshops, informational booths at community events, presentations to civic leaders and community groups, staff trainings, and distribution of multi-lingual fair housing literature.
- Conduct focused outreach and education to small property owners/landlords on fair housing, and race, reasonable accommodation and familial status issues in particular. Conduct property manager trainings on a regular basis, targeting managers of smaller properties, and promote fair housing certificate training offered through the fair housing providers.
- Provide general counseling and referrals to address tenant-landlord issues through each city's fair housing contractor, and provide periodic tenant-landlord walk-in clinics at City Halls and other community locations.

- Include testing/audits within the scope of work for each city's fair housing provider. Support enforcement activity and publicize outcomes of fair housing litigation as a means to deter discriminatory practices and to encourage reporting.

2. Racial and Ethnic Segregation

Impediment A-2: Residential segregation refers to the degree in which groups live separately from one another. Within the County there are areas of racial/ethnic concentrations, such as in Santa Ana where over three-quarters of the population is Hispanic and ten percent Asian. Approximately ten percent of households in the County are considered to be limited English-speaking households.

Recommendations for All Jurisdictions:

- Coordinate with fair housing providers to focus fair housing services, education/outreach, and/or additional testing in identified areas of racial/ethnic concentrations.
- Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities. Facilitate the provision of affordable housing throughout the community through: 1) available financial assistance; 2) flexible development standards; 3) density bonuses; and 4) other zoning tools.
- Promote equal access to information on the availability of affordable housing by providing information in multiple languages, and through methods that have proven successful in outreaching to the community, particularly those hard-to-reach groups.
- Affirmatively market first-time homebuyer and/or housing rehabilitation programs to low and moderate income areas, and areas of racial/ethnic concentration.
- Work collaboratively with local housing authorities to ensure affirmative fair marketing plans and de-concentration policies are implemented.

3. Denial of Reasonable Modifications/ Reasonable Accommodations

Impediment A-3: Denial of reasonable modification or reasonable accommodation is a continuing impediment to fair housing choice, and represents over one-half of alleged discriminatory acts in the 16 participating jurisdictions.

Recommendations for All Jurisdictions:

- Through each city's fair housing contractor, continue to provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/accommodations is unlawful.
- Provide information on the unlawful practice of denying reasonable modifications/ accommodations at fair housing seminars conducted by the Apartment Association of Orange County.

4. Discriminatory Advertising

Impediment A-4: Regionally, there were incidents of discriminatory advertising that have the potential to discourage a certain type of renter or buyer from pursuing a housing opportunity. Ads indicating a preference for a certain type of tenant or buyer, such as “no pets”, “no children”, or “Ideal for single adult” have the effect of housing discrimination.

Recommendations for All Jurisdictions:

- Through each city's fair housing contractor, periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements. When identified, make contact with the individual or firm and provide fair housing education.
- Take steps to encourage both the Los Angeles Times and Orange County Register to publish a Fair Housing Notice and a "no pets" disclaimer that indicates rental housing owners must provide reasonable accommodations, including "service animals" and "companion animals" for disabled persons.

5. Hate Crimes

Impediment A-5: Hate crimes committed at a residence are an impediment to fair housing choice because they impact the lives of an average of 35 households per year in the 16 participating Orange County cities. Of the total 169 hate crime incidents reported between 2010 and 2014, 57 incidents were related to race, 38 to religion, 37 to sexual orientation, 33 to ethnicity, 2 to disability and 2 to gender identity. Nearly 60 percent of these incidents occurred within the following four jurisdictions: Huntington Beach (36 incidents), Santa Ana (31 incidents), Newport Beach (18 incidents), and Garden Grove (15 incidents).

Recommendations for All Jurisdictions:

- Continue to monitor FBI data to determine if any hate crimes are housing related and if there are actions that may be taken by the City or its fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes.
- Continue to coordinate with various City and County housing, building and safety, health and sanitation, law enforcement and legal aid offices to maintain a comprehensive referral list of support services for victims of hate crimes or other violent crimes – inclusive of housing resources.

6. Unfair Lending

Impediment A-6: Disparities in the home purchase loan denial rates experienced by Hispanic and Black/African American applicants within the 16 Orange County cities creates an impediment to fair housing choice as they have loans denied at rates 1.5 to 1.6 times greater than White applicants. In addition, Hispanic residents, which comprise 34 percent of Orange County’s population, account for just 10 percent of applications for home purchase loans. Examples of the disparity between Hispanic residents and Hispanic applicants for home purchase loans include: Anaheim has a 53

percent Hispanic population, with 20 percent of purchase loan applicants comprised of Hispanics; La Habra has a 60 percent Hispanic population, with 23 percent Hispanic mortgage loan applicants; and Santa Ana has a 79 percent Hispanic population, with just 30 percent of home purchase loan applications made by Hispanics. In addition, the proportion of Hispanics to the total pool of mortgage loan applicants in the 16 Orange County cities has decreased in each of the past five years, from 16 percent in 2008 to 10 percent in 2013.

Recommendations for All Jurisdictions:

- As resources permit, monitor HMDA data annually using the 2013 HMDA analysis as a benchmark.
- As resources permit, monitor the top 10 lenders in Orange County to compare and contrast loan denial rates and percentage of loans completed to minority populations.
- Both of the Orange County fair housing service contractors should assist in identifying potential issues regarding redlining, predatory lending and other illegal lending activities. In addition, each city should review their agreements annually to make sure that increased and comprehensive services are being provided, and that education and outreach efforts are expanded and affirmatively marketed in low and moderate income and racial concentrated areas.
- Each city should explore ways to collaborate with local lenders and support lenders' efforts to work with community groups to help minority households purchase their homes. Collaborative efforts should ensure that minority groups have access and knowledge of City programs, supportive services, and provide for networking opportunities with these groups.
- Coordinate with local lenders to expand outreach efforts to first time homebuyers in minority neighborhoods.
- Affirmatively market first-time homebuyer and/or housing rehabilitation programs in neighborhoods with high denial rates, high minority population concentrations and limited English speaking proficiency to help increase loan approval rates.

B. Public Sector Impediments

1. Housing Element Compliance

Impediment B-1: According to HCD, of the 16 participating jurisdictions, 14 Housing Elements were in compliance, one housing element was out of compliance (City of Fullerton), and San Clemente submitted a draft Housing Element for the current 2014-2021 period in early 2016.

Recommendations for Specific Jurisdictions:

- Fullerton and San Clemente should pursue State certification of their Housing Elements.

2. Housing for Persons with Disabilities

Impediment B-2: Disability is the greatest cited basis for discrimination, comprising over half of the fair housing cases opened by the Orange County Fair Housing Council and Fair Housing Foundation in the 16 cities over the past three years. With the exception of the City of San Clemente, all participating jurisdictions have adopted formal policies and procedures in the Municipal Code to reasonably accommodate the housing needs of disabled residents. However, three cities charge a fee (Anaheim, Tustin and La Habra), and one city requires a public hearing (Newport Beach). Imposing a fee or a requirement for a public hearing could serve as an impediment to persons with disabilities seeking reasonable accommodation.

Recommendations for Specific Jurisdictions:

- The City of San Clemente should adopt formal Reasonable Accommodations policy and procedure in 2016.
- The cities of Anaheim, Tustin and La Habra should consider eliminating the processing fee for reasonable accommodation requests.
- The City of Newport Beach should consider amending its Reasonable Accommodation procedures to eliminate the requirement for a public hearing, and to approve administratively.

3. Zoning Regulations

Impediment B-3: The analyses of the land use controls and zoning codes identified the following potential issues:

- **Second Units:** The City of Newport Beach does not currently provide for second units in its Zoning Code for single-family zoned properties, but does allow for "granny units" (accessory, age-restricted units) subject to Zoning Administrator approval of a Minor Use Permit. The City's age restrictions, combined with the requirement for non-ministerial approval, may serve to impede housing choice.
- **Single-Room Occupancy Housing**: The majority of the 16 participating cities either contain specific provisions for SROs in their Zoning Ordinances, or have clarified in their Housing Elements how SROs are provided for under other zoning classifications. The cities of Buena Park, Orange and Santa Ana, however, do not currently specify zoning for SROs, or otherwise clarify how such uses would be provided for, though Buena Park has indicated SROs could currently be accommodated through a development agreement. Buena Park and Orange both include programs in their 2014-2021 Housing Elements to amend the Zoning Code to specifically address the provision of SRO units. Lack of clarity on provision for SROs can serve to limit housing choice to extremely low income households, including persons with disabilities and veterans.
- **Transitional/Supportive Housing:** In all participating jurisdictions, with the exception of the cities of Fountain Valley and Orange, transitional and supportive housing is permitted in the

manner prescribed by State law, regulated as a residential use and subject to the same permitting and standards as similar residential uses of the same type in the same zone. The City of Orange Zoning Code currently only addresses transitional and supportive housing structured in the form of group housing, and the City of Fountain Valley Zoning Code contains a definition of supportive housing but doesn't specify how such uses are to be regulated.

Recommendations for Specific Jurisdictions:

- The City of Newport Beach should consider pursuing a Zoning Code amendment to eliminate the current age restriction on second units and establish a ministerial review process.
- The cities of Buena Park, Orange and Santa Ana should amend their Zoning Codes to specify provisions for SRO units.
- The cities of Fountain Valley and Orange should amend their Zoning Codes to regulate transitional and supportive housing as a residential use, subject to the same standards as other residential uses of the same type in the same zone.

4. Density Bonus Incentives

Impediment B-4: All 16 jurisdictions have adopted local density bonus ordinances which implement state density bonus law, providing density and other development incentives and concessions for the provision of affordable housing. However, with the recent addition of anti-displacement provisions under AB 222, and modified parking standards for transit-accessible projects under AB 744, jurisdictions should update their density bonus ordinances to reflect these new State requirements.

Recommendations for All Jurisdictions:

- All 16 jurisdictions should amend the Zoning Code to reflect current State density bonus law.

Table 8-1: City of Mission Viejo Fair Housing Action Plan 2015/16 - 2019/20

Impediment		Actions	Time Frame
A. Regional, Private Sector Impediments Carried Over from 2010 Regional and Subregional AI			
A-1. Housing Discrimination	Data indicates housing discrimination continues to exist throughout Orange County, as evidenced by the number of complaints and fair housing cases opened by the Fair Housing Foundation and Fair Housing Council of Orange County. An average of 85 cases were opened in the participating cities over the past three years, with the leading bias based on disability (physical and mental), followed by familial status, national origin and race.	a) Conduct multi-faceted fair housing outreach to tenants, landlords, property owners, realtors, and property management companies. Methods of outreach should include workshops, informational booths, presentations to civic leaders and community groups, staff trainings, and distribution of multi-lingual fair housing literature. b) Conduct focused outreach to small property owners/ landlords; conduct property manager trainings on a regular basis; promote fair housing certificate training. c) Provide general counseling and referrals to address tenant-landlord issues, and provide periodic tenant-landlord walk-in clinics at City Halls and other community locations. d) Include testing/audits within the scope of work for each city's fair housing provider. Support enforcement activity and publicize outcomes of fair housing litigation.	Ongoing 2015/16 - 2019/20
A-2. Racial and Ethnic Segregation	Residential segregation refers to the degree in which groups live separately from one another. As presented within the Community Profile, there are areas of racial/ethnic concentrations in the County. Approximately ten percent of households are considered to be limited English-speaking households.	a) Coordinate with fair housing providers to focus fair housing services, education/outreach, and/or additional testing in areas of racial/ethnic concentrations. b) Offer a variety of housing opportunities to enhance mobility among residents of all races and ethnicities. Facilitate affordable housing throughout the community through: 1) available financial assistance; 2) flexible development standards; 3) density bonuses; and 4) other zoning tools.	Ongoing 2015/16 - 2019/20

Table 8-1: City of Mission Viejo Fair Housing Action Plan 2015/16 - 2019/20

Impediment		Actions	Time Frame
		c) Promote equal access to information on the availability of affordable housing by providing information in multiple languages, and through methods that have proven successful in outreaching to the community, particularly those hard-to-reach groups. d) Affirmatively market first-time homebuyer and/or housing rehabilitation programs to low and moderate income areas, and areas of racial/ethnic concentration. e) Work collaboratively with local housing authorities to ensure affirmative fair marketing plans and de-concentration policies are implemented.	
A-3. Denial of Reasonable Modifications/ Reasonable Accommodations	Denial of reasonable modification or reasonable accommodation is a continuing impediment to fair housing choice, and represents over one-half of alleged discriminatory acts in the 16 participating jurisdictions.	a) Through each city's fair housing contractor, continue to provide fair housing education and information to apartment managers and homeowner associations on why denial of reasonable modifications/ accommodations is unlawful. b) Provide information on the unlawful practice of denying reasonable modifications/accommodations at fair housing seminars conducted by the Apartment Association of Orange County.	Ongoing 2015/16 - 2019/20
A-4. Discriminatory Advertising	Regionally, there were incidents of discriminatory advertising that have the potential to discourage a certain type of renter or buyer from pursuing a housing opportunity. Ads indicating a preference for a certain type of tenant or buyer, such as “no pets”, “no children”, or “Ideal for single adult” have the effect of housing discrimination.	a) Through each city's fair housing contractor, periodically monitor local newspapers and online media outlets to identify potentially discriminatory housing advertisements. When identified, make contact with the individual or firm and provide fair housing education. b) Take steps to encourage both the Los Angeles Times and Orange County Register to publish a Fair Housing Notice and a "no pets" disclaimer that indicates rental	Ongoing 2015/16 - 2019/20

Table 8-1: City of Mission Viejo Fair Housing Action Plan 2015/16 - 2019/20

Impediment		Actions	Time Frame
		housing owners must provide reasonable accommodations, including "service animals" and "companion animals" for disabled persons.	
A-5. Hate Crimes	Hate crimes committed at a residence are an impediment to fair housing choice because they impact the lives of an average of 35 households per year in the 16 participating Orange County cities. Of the total 169 hate crime incidents reported between 2010 and 2014, 57 incidents were related to race, 38 to religion, 37 to sexual orientation, 33 to ethnicity, 2 to disability and 2 to gender identity.	a) Continue to monitor FBI data to determine if any hate crimes are housing related and if there are actions that may be taken by the City or its fair housing service provider to address potential discrimination linked to the bias motivations of hate crimes. b) Continue to coordinate with various City and County housing, building and safety, health and sanitation, law enforcement and legal aid offices to maintain a comprehensive referral list of support services for victims of hate crimes or other violent crimes –inclusive of housing resources.	Ongoing 2015/16 - 2019/20
A-6. Unfair Lending	Disparities in the home purchase loan denial rates experienced by Hispanic and Black/African American applicants within the 16 Orange County cities creates an impediment to fair housing choice as they have loans denied at rates 1.5 to 1.6 times greater than White applicants. In addition, Hispanic residents, which comprise 34 percent of Orange County's population, account for just 10 percent of home purchase loans, and the percentage of completed mortgage loans by Hispanics has decreased in each of the past five years.	a) As resources permit, monitor HMDA data annually using the 2013 HMDA analysis as a benchmark. b) As resources permit, monitor the top 10 lenders in Orange County to compare and contrast loan denial rates and percentage of loans completed to minority populations. c) Both of the Orange County fair housing service contractors should assist in identifying potential issues regarding redlining, predatory lending and other illegal lending activities. Each city should review their agreements annually to make sure that increased and comprehensive services are being provided, and that education and outreach efforts are expanded and affirmatively marketed in low and moderate income and racial concentrated areas.	Annually 2017 Ongoing 2015/16 - 2019/20

Table 8-1: City of Mission Viejo Fair Housing Action Plan 2015/16 - 2019/20

Impediment		Actions	Time Frame
		d) Each city should explore ways to collaborate with local lenders and support lenders' efforts to work with community groups to help minority households purchase their homes. Collaborative efforts should ensure that minority groups have access and knowledge of City programs, supportive services, and provide for networking opportunities with these groups.	2017
		e) Coordinate with local lenders to expand outreach efforts to first time homebuyers in minority neighborhoods.	2017
		f) Affirmatively market first-time homebuyer and/or housing rehabilitation programs in neighborhoods with high denial rates, high minority population concentrations and limited English speaking proficiency to help increase loan approval rates.	2016
B. Public Sector Impediments ***(Only actions pertinent to Mission Viejo identified)***			
B-4. Density Bonus Incentives	All 16 jurisdictions have adopted local density bonus ordinances which implement state density bonus law, providing density and other development incentives and concessions for the provision of affordable housing. However, with the recent addition of anti-displacement provisions under AB 222, and modified parking standards for transit-accessible projects under AB 744, all 16 jurisdictions should update their density bonus ordinances to reflect these new State requirements.	a) All 16 jurisdictions should amend their Zoning Codes to reflect current State density bonus law.	2016

Appendix A: Community Participation

APPENDIX A-1: Fair Housing Workshops

APPENDIX A-2: Fair Housing Surveys

APPENDIX A-3: Public Review Comments

Fair Housing Workshops

We invite you to participate in one of five Fair Housing Workshops hosted by a group of 16 Orange County cities.* These workshops are aimed at tenants, landlords, social service providers, housing professionals and anyone who has concerns about fair housing in their community. Your input will help develop the federally-required *Analysis of Impediments to Fair Housing Choice* — the planning document for providing equal housing opportunities.

Anaheim

Tuesday, September 22, 2015
6:00 PM-7:30 PM
Assembly Hall, Downtown Anaheim Community Center
250 E. Center Street, Anaheim

Tustin

Wednesday, September 23, 2015
6:00 PM-7:30 PM
Professional Training Center
Tustin Library
345 E. Main Street, Tustin

Fountain Valley

Thursday, September 24, 2015
6:00 PM-7:30 PM
City Hall Council Chambers
10200 Slater Avenue, Fountain Valley

Santa Ana

Wednesday, September 30, 2015
6:00 PM-7:30 PM
Santa Ana Police Community Room
60 Civic Center Plaza, Santa Ana

Lake Forest

Thursday, October 1, 2015
6:00 PM-7:30 PM
City Hall, Community Room
25550 Commercentre Drive, Lake Forest

Fair Housing issues to be discussed include:

- Housing affordability/availability
- Tenant/landlord relations
- Accessibility to persons with disabilities
- Real estate and mortgage lending practices
- Public policies affecting fair housing choice

For more information, please contact:
John Oshimo at 626.331.6373 or
joshimo@grcassoc.com

Please take our brief Fair Housing Survey online:

English https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_ENGLISH

Spanish https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_SPANISH

Vietnamese https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_VIETNAMESE

Korean https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_KOREAN

* The 16 participating cities include:
Anaheim, Buena Park, Costa Mesa, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, La Habra, Lake Forest, Mission Viejo, Orange, Newport Beach, Rancho Santa Margarita, San Clemente, Santa Ana, and Tustin

Talleres de Equidad de Viviendas

Le invitamos a participar en uno de los cinco Talleres de Equidad de Viviendas organizada por un grupo de 16 ciudades del Condado de Orange.* Estos talleres están dirigidos a inquilinos, propietarios, proveedores de servicios sociales, profesionales de viviendas y cualquier persona que tenga inquietudes sobre la equidad de viviendas en su comunidad. Su contribución ayudará a desarrollar el informe requerido por el gobierno federal, Análisis de Impedimentos de Elección de Vivienda Justa *(Analysis of Impediments to Fair Housing Choice)* — el documento de planificación para proporcionar igualdad de oportunidades de viviendas.

Anaheim
Martes, 22 de septiembre 2015
6:00 PM-7:30 PM
Assembly Hall, Downtown Anaheim Community Center
250 E. Center Street, Anaheim

Tustin
Miércoles, 23 de septiembre 2015
6:00 PM-7:30 PM
Professional Training Center
Tustin Library
345 E. Main Street, Tustin

Fountain Valley
Jueves, 24 de septiembre 2015
6:00 PM-7:30 PM
City Hall Council Chambers
10200 Slater Avenue, Fountain Valley

Santa Ana
Miércoles, 30 de septiembre 2015
6:00 PM-7:30 PM
Santa Ana Police Community Room
60 Civic Center Plaza, Santa Ana

Cuestiones de equidad de vivienda que se consideraran incluyen:

- Disponibilidad / Asequibilidad de Viviendas
- Las relaciones de inquilino / propietario
- Accesibilidad a las personas con discapacidad
- Las prácticas de préstamos de bienes raíces e hipotecas
- Las políticas públicas que afectan a la elección de vivienda justa

Para obtener más información, póngase en contacto:
Robert G. Vasquez at 626.331.6373 o
rvasquez@grcassoc.com

Por favor tome nuestra breve encuesta de Vivienda Justa en línea :

Inglés https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_ENGLISH

Español https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_SPANISH

Vietnamita https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_VIETNAMESE

Coreano https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_KOREAN

Lake Forest
Jueves, 01 de octubre 2015
6:00 PM-7:30 PM
City Hall, Community Room
25550 Commercentre Drive, Lake Forest

* Las 16 ciudades participantes incluyen :
Anaheim, Buena Park, Costa Mesa, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, La Habra, Lake Forest, Mission Viejo, Orange, Newport Beach, Rancho Santa Margarita, San Clemente, Santa Ana, and Tustin

HỘI THẢO VỀ CÔNG BẰNG GIA CƯ

Kính mời quý vị tham dự một trong năm buổi Hội Thảo về Công Bằng Gia Cư được đồng tổ chức bởi 16 thành phố thuộc Quận Cam.* Các buổi hội thảo này dành cho những người thuê nhà, chủ nhà, cán sự xã hội, chuyên viên về gia cư và bất cứ ai có quan tâm đến vấn đề công bằng gia cư trong cộng đồng của họ. Ý kiến đóng góp của quý vị sẽ giúp ích cho việc phân tích các yêu cầu của Liên bang về những trở ngại trong *Fair Housing Choice* — Các tài liệu kế hoạch cho việc cung cấp những cơ hội trợ cấp gia cư một cách công bình.

Anaheim
Thứ Ba, 22 tháng 9 năm 2015
6:00 PM-7:30 PM
Assembly Hall, Downtown Anaheim Community Center
250 E. Center Street, Anaheim

Tustin
Thứ Tư, 23 tháng 9 năm 2015
6:00 PM-7:30 PM
Professional Training Center
Tustin Library
345 E. Main Street, Tustin

Fountain Valley
Thứ Năm, 24 tháng 9 năm 2015
6:00 PM-7:30 PM
City Hall Council Chambers
10200 Slater Avenue, Fountain Valley

Santa Ana
Thứ Tư, 30 tháng 9 năm 2015
6:00 PM-7:30 PM
Santa Ana Police Community Room
60 Civic Center Plaza, Santa Ana

Lake Forest
Thứ Năm, 1 tháng 10 năm 2015
6:00 PM-7:30 PM
City Hall, Community Room
25550 Commercentre Drive, Lake Forest

Những vấn đề Công Bằng Gia Cư sẽ được bàn bạc bao gồm:

- ❖ Nhà ở giá phải chăng/ có sẵn
- ❖ Quan hệ thuê nhà / chủ nhà
- ❖ Lối vào nhà dành cho người khuyết tật
- ❖ Các phương thức cho vay bất động sản và nhà đất
- ❖ Chính sách công cộng ảnh hưởng đến sự lựa chọn trong công bằng gia cư

Để biết thêm chi tiết, xin liên lạc:
John Oshimo at 626.331.6373 or joshimo@grcassoc.com

Xin mời tham gia cuộc khảo sát ngắn gọn về Công Bằng Gia Cư trên website:

English
https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_ENGLISH
Spanish
https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_SPANISH
Vietnamese
https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_VIETNAMESE
Korean
https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_KOREAN

* 16 thành phố đồng tham gia bao gồm: Anaheim, Buena Park, Costa Mesa, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, La Habra, Lake Forest, Mission Viejo, Orange, Newport Beach, Rancho Santa Margarita, San Clemente, Santa Ana, and Tustin

Fair Housing Workshop

September 22, 2015

Anaheim

Name	Resident/Organization	Address	Phone or email
Gina Rojas	Apt. Mgr	Fullerton	714) 870-6250
Dana Motusaga	Asst. MgR	"	"
Marisol Marure	Hous Dayle McIntosh Center	Anaheim	714-621-3300-ext 369
Diana Rozendaal	Illumination Foundation	Stanton	714-576-2550
Regail Carr	Pathways of Hope	Fullerton	regail.carr@pathwaysofhope.us
Leticia Murillo	Apt. Rent	Anaheim	(714) 563-9356
Elizabeth [illegible]	Apt. Rent	Anaheim	(714) 999-5499

Fair Housing Workshop

September 22, 2015

Anaheim

Name	Resident/Organization	Address	Phone or email
Nida Watkins	City of Garden Grove	11222 Acacia Pkwy	nidaw@ci.garden-grove.ca.us
Charles Kovac	City of Fullerton	303 W. Commonwealth	charlesk@ci.fullerton.ca.us
Susana Flores	City of Fullerton	303 W. Commonwealth Ave	Susanaf@ci.fullerton.ca.us

Fair Housing Workshop

September 23, 2015

Tustin

Name	Resident / Organization	Address	Phone or Email
Martha Hanley	Tustin Villas MGR	15910 Pasadena Ave Tustin	7/832-3627
Resident		Pacific Pointe Apartments	
[illegible]	14011 [illegible]		714-955-1806
Adrianne DiLeva-Johnson	City of Tustin	300 Centennial Wy.	714-573-3138
MARY ELLEN LASTER	CITY OF ORANGE	300 EAST CHAPMAN AVE ORANGE CA	(714) 744-7211
ROBERT A Vasquez	GRC		626-331-6373

Fair Housing Workshop

September 24, 2015

Fountain Valley

Name	Resident / Organization	Address	Phone or Email
Maureen Blackm	Garden Grove Neighborhood Imp Comm	12381 Meade St	66 92841
Michael Blackmun	Costa Mesa	395 Costa Mesa St.	Maureen.ggNA@gmail
Ramona Ruiz	Santa Ana	3909 S. Ross Apt A S.A	714-235-5360
		92707	Twobadges@sbcglobal.net
Rubén Vasey	GRC Associates, Inc.		626-331-6373

Fair Housing Workshop

September 30, 2015

Santa Ana

Name	Resident / Organization	Address	Phone or Email
Sevelo Rosas	Desident.	1230 S. Maple St. S.A.	(714) 8565796
John Oshima	GRC Associates Inc		626-331-6373
Robert G. Vasquez	GRC Assoc.		626-331-6373
Sylvia Vazquez	City of SA		714-[illegible]-5445
Rosie Loeza	SA		loeza122@gmail.com
Maria Isidoro	~~Real~~ FHC of OC.	1514 Brookhollow Dr. Ste A. SA CA. 92703	misidoro@fairhousingoc.org.
Linh Tran	FHCOC	"	LTRAN@fairhousingoc.org
Deborah Uribe	APS	14211 Yorba St. Ste 102	duribe@c-cdev.com
Betty Medina	APS	14211 Yorba St Ste 102	servanowoods@apsmanagement.
Beth Craig	Resident	1600 E 17th St #66 SA	calypsd84@gmail.com
JULIANA MOMOTIC	RESIDENT		
VIVIAN PALLACIC	RESIDENT	3050S. BRISTOL ST. #9L S.A	jmi1481@gmail
Kelly RUBIO	Resident	514 N. WRIGHT ST SA	
Yolanda Lopez	Resident	526 N McClay St S.A.	
Judson Brown	City of Santa Ana		jbrown@santa-ana.org
[illegible]	Resident	1414 N SPURGEON APT 202	(714) 206-9211
Teresa N. Simon	resident	5117 W. Progresso SA 92703	714 530-3715
Rafaela Montoya	CCBHC	1277 S. Lyon St SA Santa Ana	714-835-1747
Ronnie Sandoval	"	"	714-835-5339

Fair Housing Workshop

September 30, 2015

Santa Ana

Name	Resident / Organization	Address	Phone or Email
VIDAL LOPEZ		1222 S. MAPLE	714 581 3337
RAFAE LOPEZ		1242 S. MAPLE	714 836 4441
Sabina Morales		1526 S. Flower	(714) 4935774
Nancy Garcia	APS Management	280 S. Esplanade St. Orange CA	714 836 7344
Jose Ortiz	APS Management	14211 Yorba Street Suite 102 Tustin Ca	(714) 263-6095
Selica Diaz	Resident (Property Management	207 S. Orange Ave. SA 92701	(714) 834-0297
Jessica Bruce	Colette's Childrens Home	7372 Prince Dr. Suite 104 HB Ca 92647	714) 596 1380
Beatriz orozco	APS Management	14211 Yorba St. Tustin CA 92780	714) 538-8050
Veronica Jimenez	Housin	313 E Pine St #16 Santa Ana ca 92701	714 679 7865
Cecilia Martinez	Recidente	510 N Mortimer #312 CA 92701 Santa Ana	(714) 579 9868
Christian Perez	Resident	1600 E 17th St 4C Santa Ana	perez.christian83@gmail.com
Julie Castaneda	Community Advocate	1701 Cavan Dr. Irvine CA 92620	julie@kennedy commission.org
Maria M. Garcia	Reciente	815 E. 3RD St 92701	(714) 252-3038
Matilde Sanchez	Reciente	510 N. Mortimer #21 Santa Ana	(714) 716-0786
Araceli Linares	Resident	512 N. Porter St. Apt #316	(714) 631-3355

16 Orange County Cities

Fifth Fair Housing Workshop

Lake Forest

City Hall,
Community Room
25550 Commercentre Drive,
Lake Forest

Regional Analysis of Impediments to Fair Housing Choice

Community Workshop
October 1, 2015

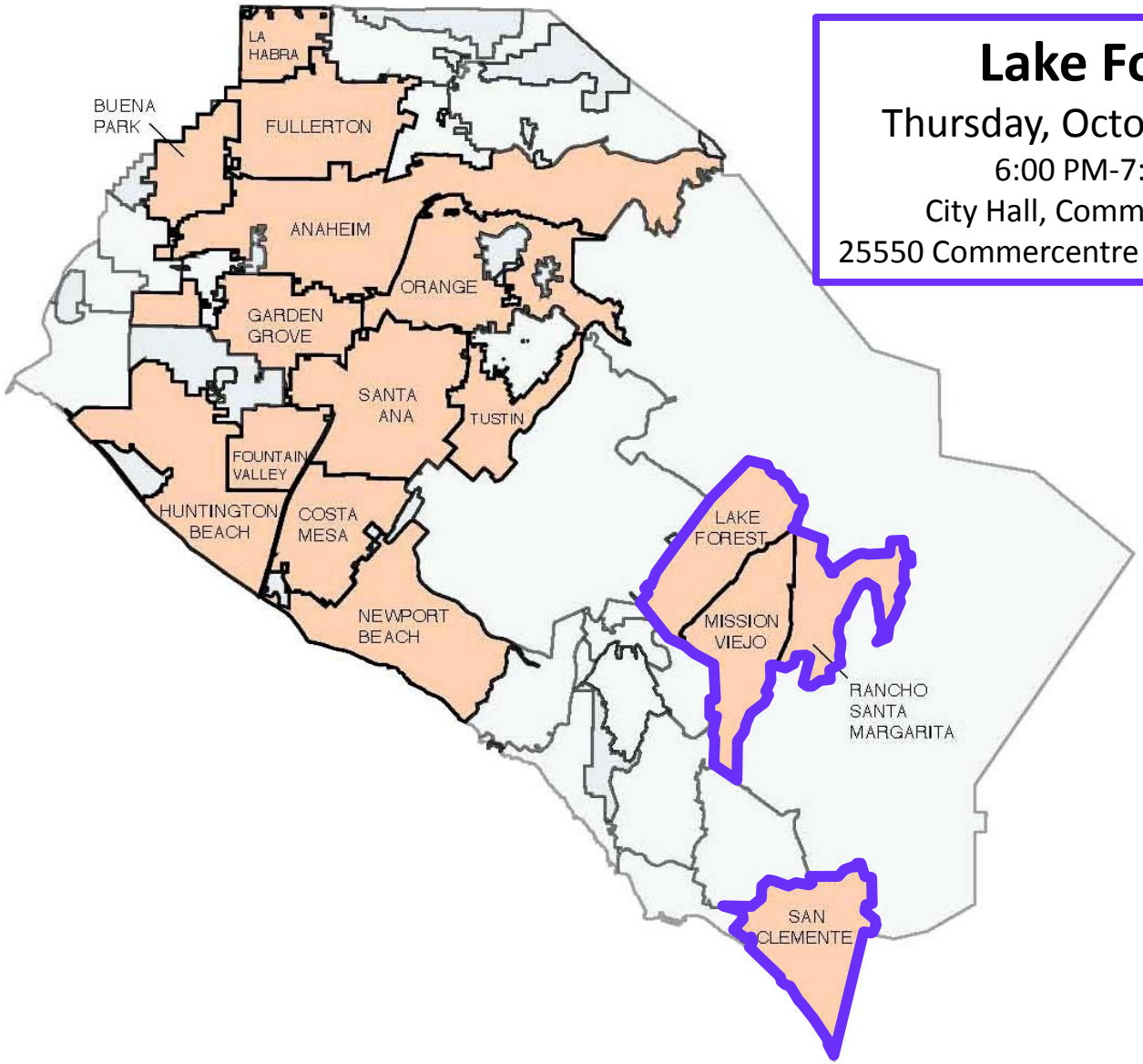
Why a Fair Housing Plan?

- **Jurisdictions receiving federal funds must certify that they are affirmatively promoting fair housing. Certification means:**
  - ✓ Prepare an Analysis of Impediments to Fair Housing Choice (AI) every 5 years
  - ✓ Take actions to eliminate identified impediments
  - ✓ Maintain fair housing records reflecting the actions taken
- **16 Orange County Cities have elected to prepare Regional AI**

16 Participating Orange County Cities

- **Anaheim**
- **Buena Park**
- **Costa Mesa**
- **Fountain Valley**
- **Fullerton**
- **Garden Grove**
- **Huntington Beach**
- **La Habra**
- **Lake Forest**
- **Mission Viejo**
- **Newport Beach**
- **Orange**
- **Rancho Santa Margarita**
- **San Clemente**
- **Santa Ana**
- **Tustin**

16 Participating Orange County Cities



Lake Forest

Thursday, October 1, 2015

6:00 PM-7:30 PM

City Hall, Community Room

25550 Commercentre Drive, Lake Forest

Definition of Fair Housing

- **Fair housing describes a condition in which individuals of similar income levels in the same housing market have a similar range of choices available to them regardless of a protected class status**

- **Prohibits discrimination in housing choice because of one's:**
  - ✓ Race or color
  - ✓ Religion
  - ✓ Sex
  - ✓ Marital or familial status
  - ✓ National origin
  - ✓ Disability
  - ✓ Gender
  - ✓ Gender identity and expression
  - ✓ Sexual orientation
  - ✓ Source of income
  - ✓ Age

Definition of Fair Housing Impediments

- **Any actions, omissions, or decisions that restricts the availability of housing choice on account of one's protected class status**
- **Communities must work to remove impediments to fair housing choice**

Key Components of the Analysis of Impediments to Fair Housing Choice (AI)

- **Regional and Community Profiles**
  - ✓ **Demographic and socioeconomic**
  - ✓ **Household and housing characteristics**
  - ✓ **Employment**
  - ✓ **Special needs**
  - ✓ **Public assisted housing**
  - ✓ **Access to public transportation**
- **Mortgage Lending Practices**
  - ✓ **Lending patterns by race/ethnicity and income levels**
  - ✓ **Lending performance by lenders**

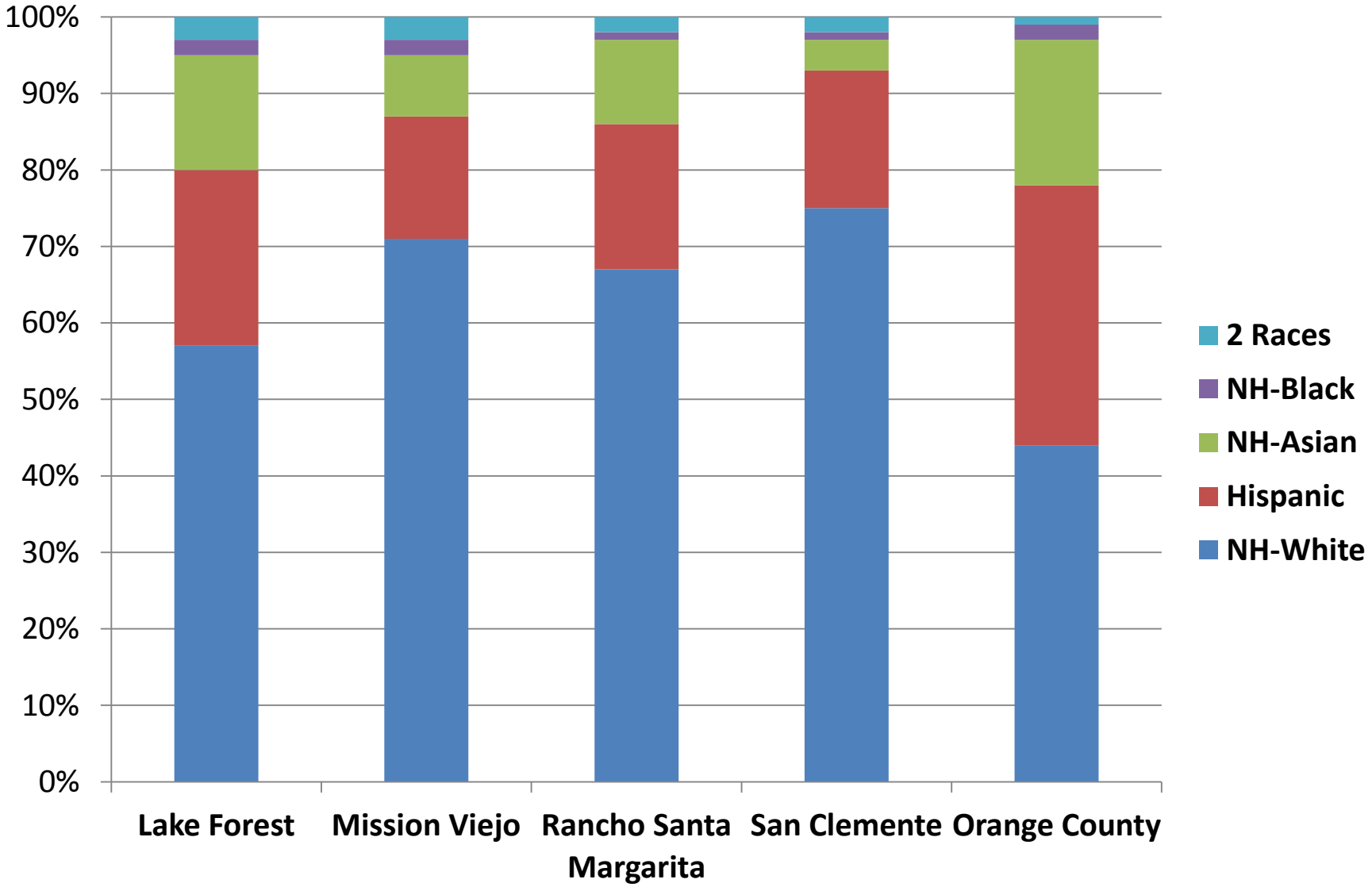
Key Components of the AI

- **Public Policies and Practices (General Plans/Zoning/ Building Codes)**
  - ✓ **Land use policies/development standards**
  - ✓ **Reasonable accommodations**
  - ✓ **Housing for special needs (disabled, seniors, homeless, etc)**
  - ✓ **Residential development fees**
- **Fair Housing Practices**
  - ✓ **Rental and homeownership market**
  - ✓ **Fair housing services**
  - ✓ **Trends in discrimination cases**

Key Components of the AI

- **Status of Actions from the 2010-2015 AI**
  - ✓ **Were the actions implemented and were they successful?**
  - ✓ **Should the actions be continued in the 2015-2020 AI?**
- **Findings and Recommendations**
  - ✓ **Identify potential impediments to fair housing choice**
  - ✓ **Recommendations /actions to address impediments**

Profile: Race/Ethnicity



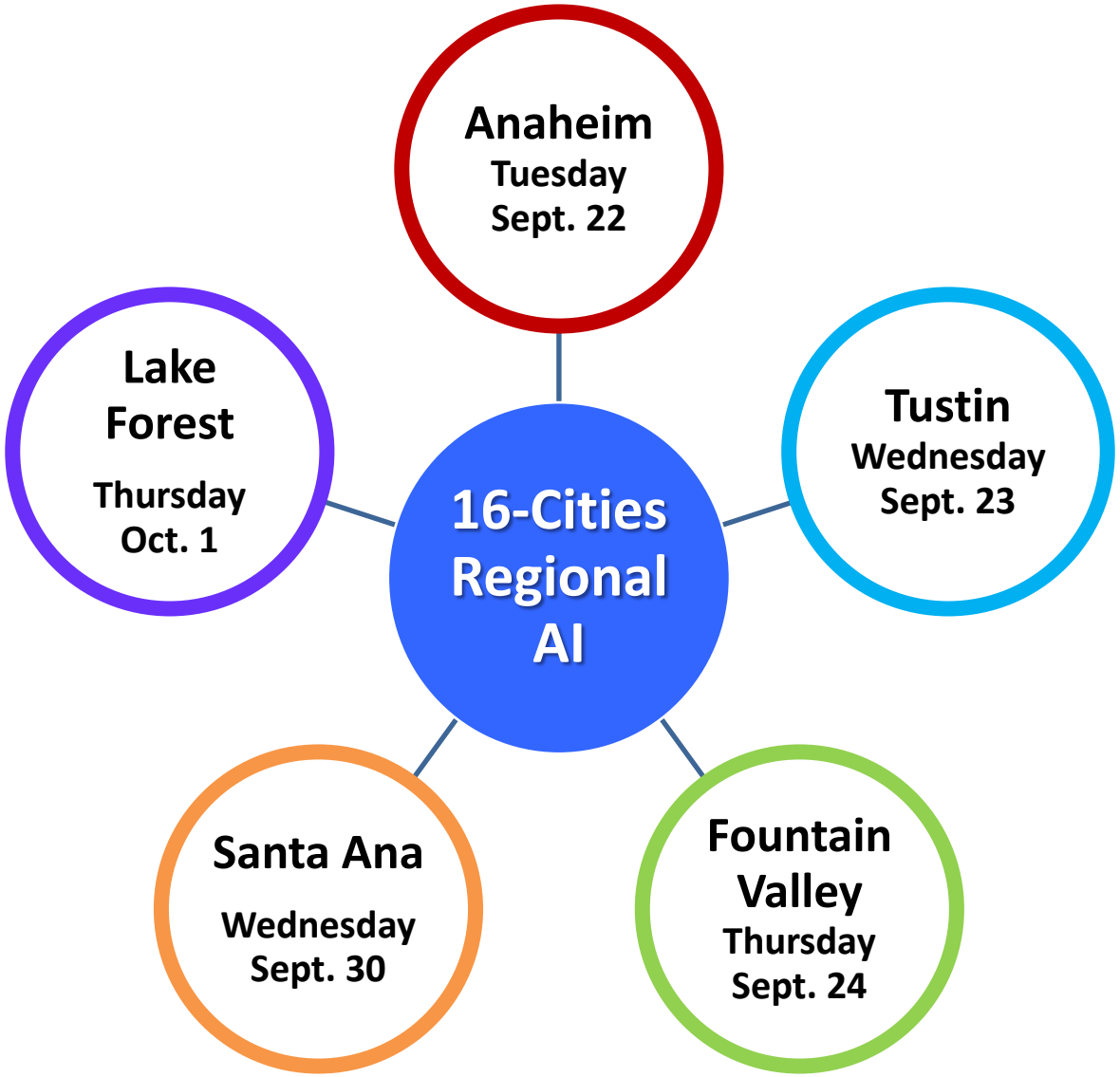
Source: American Community Survey 2009-2013

Profile: Age and Disability

- **Dependent Population**
  - ✓ **About one-quarter (24%) of total County population under the age of 18 years**
  - ✓ **12% over the age of 65 years**
- **Persons with Disability**
  - ✓ **8% of total County population include persons with a disability or 237,000 residents**
  - ✓ **Of the population 65 years and over, almost one-third (32%) persons with disability**

Source: American Community Survey 2009-2013

Community Workshop Series



Anaheim
Assembly Hall, Downtown Anaheim Community Center
250 E. Center St., Anaheim

Tustin
Professional Training Center, Tustin Library
345 E. Main St., Tustin

Fountain Valley
City Hall Council Chambers
10200 Slater Ave., Fountain Valley

Santa Ana
Santa Ana Police Community Rm.
60 Civic Center Plaza, Santa Ana

Lake Forest
City Hall, Community Rm.
25550 Commercentre Dr., Lake Forest

Fair Housing Survey

- **Key Questions of the Survey**
  - ✓ **Have you encountered discrimination?**
  - ✓ **Who discriminated against you?**
  - ✓ **Where did the discrimination occur?**
  - ✓ **What was the basis for the discrimination?**
  - ✓ **Did you report the incident?**
  - ✓ **Have you been denied “reasonable accommodation”?**
  - ✓ **How well inform are you on your fair housing rights?**
  - ✓ **What would you do if you encounter discrimination?**
  - ✓ **Do you believe housing discrimination occurs in Orange County?**

Fair Housing Survey

- **Online Fair Housing Survey on City Websites**
  - ✓ **English:** https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_ENGLISH
  - ✓ **Spanish:** https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_SPANISH
  - ✓ **Vietnamese:** https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_VIETNAMESE
  - ✓ **Korean:** https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_KOREAN

- **Hardcopy Fair Housing Survey**
  - ✓ **City Halls and libraries**
  - ✓ **Mailed to housing and social service providers**
  - ✓ **County Fair Housing Workshops**

AI Process and Timeline

June 2015	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan. 2016
Project Kick-Off	Info. Collection	Regional and Local Community Profiles	Mortgage Lending Practices Public Policies and Practices	Fair Housing Practices Progress Since 2010	Screen Draft/ Draft AI Action Plan Matrices	30-day Public Review	Final AI

Outreach Effort

- Community Outreach Notices
- Workshops:
  9/22 Anaheim
  9/23 Tustin
  9/24 Fountain Valley
  9/30 Santa Ana
  10/1 Lake Forest

  Needs Surveys
- Results of Workshops and Needs Survey
- Working Group Study Session on Screen Draft AI
- Draft AI Available at City Halls, libraries and City Websites
- Public Hearings

Workshop Feedback

- **What are the Most Important Fair Housing Issues and Needs?**
- **What Actions can the City, Fair Housing Service Providers, and Community Stakeholders Pursue to Address These Fair Housing Needs?**

Fair Housing Services

- **Provide programs and services for the elimination of discrimination, general housing (tenants and landlords) service and education to cities**
- **Fair Housing Foundation (800) 446-3247**
  - ✓ **Housing service to Anaheim, Buena Park, Costa Mesa, Fullerton, Garden Grove, Huntington Beach, Mission Viejo, Newport Beach, Orange, San Clemente, and Tustin**
- **Fair Housing Council of Orange County (714) 569-0823**
  - ✓ **Housing service to Fountain Valley, La Habra, Lake Forest, Rancho Santa Margarita, and Santa Ana**

Thank You

If you have additional questions or comments after this workshop, please contact:

John Oshimo or Robert Vasquez
GRC Associates
626-331-6373 or
joshimo@grcassoc.com
rvasquez@grcassoc.com

Appendix A-1

Compiled List of Workshop Outreach from 16 cities

City of Anaheim

AI Workshop Outreach FY 15/16 HUD Subrecipients

Allyson Crosby	acrosby@ifhomeless.org
Alycia Capone	alycia.capone@pathwaysofhope.us
Ann Trovada	atrovada@anaheimymca.org
Ashley Spindler	aspindler@lestonnacfreeclinic.org
Audrey Mcintosh	meg@grandmashouseofhope.org
Barbara Jennings	Barbara.Jennings@pathwaysofhope.us
Bradford Jones	dmassethjones@ywcanoc.org
Bradford Jones	dmassethjones@yweanoc.org
Bryon Reliford	breliford@anaheimymca.org
Carol Anne Williams	carol@intervalhouse.org
Carol McKinny	cmckinney@mariposacenter.org
Cyndee Albertson	Cyndee@ThomasHouseShelter.org
Diana Meier	dmeier@ocasf.org
Diana Stalter	dstalter@healinghomelessness.org
Diane Messeth-Jones	DianeMassethjones@ywcanoc.org
Dr. Brad Fieldhouse	bfieldhouse@citynet.org
Dr. Cynthia Smith, MT-BC	creativeidentityanaheim@yahoo.com
Dr. Krista Driver, LMFT	kdriver@mariposacenter.org
Evette Nadolny	enadolny@anaheimymca.org
Gracelene Gracia	ggracia@anaheimymca.org
Janeth Velazquez	jvelazquez@seniorserv.org
John Kim	jkim@ifhomeless.org
John Machiaverna	jmac@theboysandgirlsclub.org
Julie Durte	jduarte@acacia-services.ort
Karen B. Williams	kwilliams@211oc.org
Kathleen Weidner	kweidner@coaoc.org
Laura Bates	laura.bates@learninglight.org
Mailory Vega	mvega@acacia-services.org
Maria Mazzenga-Avellaneda	maria.mazzenga@pathwaysofthope.uc
Marytza Rubio	MRubio@ifhomeless.org
Mayra Mejia Gille	mmejia@211oc.org
Megan Hartman	MHartman@bigbrooc.org
Michael Baker	mike@theboysandgirlsclub.org
Michael Shephard	michael@grandmashouseofhope.org
Michaela Lemelin	Michaela.lemelin@learninglight.org
Nahla Kayali	nkayali@accesscal.org
Odezza Larida	odezza@grandmashouseofhope.org
Paul Cho	PCho@ifhomeless.org
Penelope Agosta	penelope@hope4arts.org
Philip Yaeger	pyaeger@acasf.org

Ray Harper	rharper@coaoc.org
Roseann Peters	rpeters@lestonnacfreeclinic.org
Sharon Wie	accounting@intervalhouse.org
Sofia Burns	sburns@211oc.org
Suhail Mulla	smulla@accesscal.org
Susan Contreras	scontreras@mariposacenter.org
SuzAnne Mathai	smathai@hopeu.org
Tatiana Caicedo	tcaicedo@seniorserv.org
Willian O'Connell	coletteschildren@aol.com

City of Buena Park

AI Workshop mailing list/Outreach Summary

The City of Buena Park used the non-profit lists from their Finance Department's Business License Division. The City mailed out approximately 25 from the list and 6 were returned as no longer in business. Additionally, the City sent out the survey to six of their CDBG subrecipients. To the City's knowledge, two of the subrecipients replied. Additionally, the City posted the survey on their website.

City of Costa Mesa

Meeting/Survey Distribution

Mercy House Transitional Living Center – Homeless/at risk
Fair Housing Foundation – Landlord and Tenants
City of Costa Mesa Senior Center – Seniors
Elwyn California – Disabled Adults
Project Independence – Disabled Adults
Alzheimer's Family Services Center – Adults with dementia
Community SeniorServ - Seniors
Women Helping Women – Low/Mod and homeless persons
Serving People In Need – Homeless/substance recovery
Council on Aging, Orange County – Seniors living in managed care
Orange Coast Interfaith Shelter – Homeless families
Human Options – Victims of domestic violence
Working Wardrobes – Low/mod and homeless persons
Families Forward – Homeless and at risk families
Colette's Children's Home – Transitional housing
City of Costa Mesa website

City of Fountain Valley

Community Care Health Centers
Council on Aging of Orange Co
Community Senior Serv
Women's Transitional Living Center
Fair Housing Council of Orange Co
Wise Place
Boys & Girls Clubs of Huntington Valley
Interval House Crisis Shelters
Alzheimer's Family Services
Community Service Programs
California Elwyn, Inc
DART

Better Vision for Children
Assistance League of Garden Grove
Mercy House
Homeless Veterans Outreach
Sweet Success Ext Program SSEP

2-1-1
Lutheran Program
Supreme Court OC/Central Justice Ctr
Mental Health Association of Orange Co
Fair Housing Foundation

City of Fullerton

Mailed notices to over 600 community groups and multi-family apartments (including the City's 17 affordable housing projects) and management companies. Placed a community meeting notice in the local paper (*Fullerton News Tribune*) in the September 10, 2015 edition. Noticed on the City's website homepage including a direct link to survey money.

City of Garden Grove

Agency contact list:

Mercy House
Assistance League of Garden Grove
Fair Housing Foundation
College of Optometry
Interval House
HPP Cares
Child Abuse Prevention Center
Thomas House
Mental Health Assoc. of Orange County
Dayle MacIntosh Center
Community SeniorServ
Fletcher House, DBA Halfway Homes
Legal Aid Society of Orange County
Rebuilding Together O.C.
H.O.P.E.
Orange County Superior Court, Central Justice Center
Hospital Assoc. of Southern California
OC Partnership
Family Support Network
Women's Transitional Living Center
Illumination Foundation
Jamboree Housing Corporation (CHDO – Non Profit Developer)
Veterans First
Acacia Adult Day Services
AIDS Services Foundation
Jamboree Housing
International Crusade of the Penny

American Lung Association
Lutheran Social Services of So. Cal.
Breast Cancer Angels
Illumination Foundation
Public Law Center
Community Health Care Centers
Interval House
Garden Grove United Methodist Church
The Syriac Charitable Society of America
American Family Housing
Vietnamese Community of Orange County
Boat People SOS
Salvation Renovation
St. Anselm Cross Cultural Community Center
211 Orange County
Colette's Children's Home

Workshop invitations to 80 property managers of apartment buildings in Garden Grove and invited City's 7 NI Commissioners.

City of La Habra

Delivered or placed the flyers in all of the following places:

1. City's website
2. Community Services Center which provides notification of City Events to: Community Groups, Block Clubs, Faith-Based and Social Organizations
3. City Hall – Public Counters
4. Public Library
5. Community Services Commission members
6. City Council members

City of Lake Forest

For the AI Workshop, city advertised it via our monthly electronic newsletter, on our website, and emails to our subrecipients and local non-profits. The surveys and meeting notice (in different languages) was sent to the following agencies. Also, the City posted notice and links to survey/meeting notice on the City's website and the City's Econ Dev website. Additionally, info was sent via e-newsletter to approximately 4,000 businesses in the City.

Saddleback Valley Unified School District	Childcare services
Vocational Visons	Disabled services
Human Options	Domestic violence services
Families Forward	Low/Mod & at-risk families services
Age Well Senior Services	Senior services
Camino Health Center	Health care services
Boys & Girls Club of Laguna Beach	Youth services
South County Outreach	Low/Mod & at-risk families services

-

MISSION VIEJO

Vocational Visions	Disabled Services
Age Well Senior Services	Senior Services
Camino Health Center	Health Care Services
Saddleback Valley USD	Childcare Services
Families Forward	L/M Services
South County Outreach	L/M Services
Council on Aging - OC	Senior Services
Birth Choice Health Clinic	Health Care Services
Fair Housing Foundation	Fair Housing Services

City of Newport Beach

The City published the attached flyer approximately 10 days in advance of the first community meeting in the Daily Pilot, a newspaper of general circulation in the Costa Mesa and Newport Beach area. The flyer was also emailed to a community interest email list with over 700 email addresses for residents, businesses and other community stakeholders.

City of Rancho Santa Margarita

Information regarding Fair Housing Survey and AI workshops was emailed to current and past public service grant recipients – see list below:

Vocational Visions
South County Outreach
Laura's House
Families Forward
Dayle McIntosh
Age Well
Santiago Seniors Club
Saddleback Valley Unified School District

City of San Clemente

Advertised on the City's homepage and we passed out flyers/surveys at the Boys and Girls Club, all public schools, ten churches, library, City Hall, and social service providers including Family Assistance Ministries and OC Human Relations.

City of Tustin

Mailed flyers to over 80 agencies and 400 property managers/realtors.

Appendix A-1

Public Comments
For
Fair Housing Workshops
Analysis Of Impediments – Group Of 16 Orange County Cities

Public Fair Housing Workshop # 1

Northern Orange County Subregion: Anaheim, Buena Park, Fullerton, La Habra

September 22, 2015 - 6:00 to 7:30 pm

City of Anaheim Assembly Hall - Community Center

Public Comments

- Who can educate property managers/leasing agents about fair housing issues? *(The Orange County Fair Housing Council and the Fair Housing Foundation both provide these services. Each city contracts with one of these fair housing providers).*
- Spanish-speaking resident brought up her situation about landlord that may be discriminating against large families. (*She took various copies of Spanish fair housing survey and said she would ask residents in her apartment complex to complete).*
- Concerns about housing affordability were brought up by resident.
- Question about how property managers can be tracked.
- Concern over current, very high rents. Landlords are asking for $1,450 for a two-bedroom unit that was recently rented at $1,200 for the same unit.
- It is not possible for some residents on Social Security to qualify for apartments now because property owners are requiring them to earn 2, or 2.5 times the income as compared to their required rent
- Workshop participant wanted to get a copy of the actions required in the AI for the previous AI five years ago. (*2010-2015 Orange County Regional AI with actions is available on-line @ http://www.newportbeachca.gov/home/showdocument?id=10768*

Public Fair Housing Workshop # 2

Central Orange County Subregion: Garden Grove, Orange, Santa Ana, Tustin

September 23, 2015 - 6:00 to 7:30 pm

City of Tustin Library – Professional Training Center

Public Comments

- Can property owners discriminate against anyone? For example, can owners limit people renting a room in their homes to single women only?
- Various issues regarding housing affordability were raised. Resident stated that some housing complexes that are "affordable" have asking rents that are nearly the same as non-restricted, market rate housing.
- There is a lack of housing opportunities for disabled people.
- Rents are increasing quickly and there are no vacancies. A property manager from Tustin Villas said that she takes a monthly survey of rents of nearby apartment complexes and all are 100% occupied and rents are increasing. Currently asking $1,600 to $1,800 per month for a 2-Bedroom, $1,395 to $1,420 for a 1-Bedroom unit and a studio is going for $1,295 per month. Rents are being paid on time and the waiting list is "real".
- Comment was made that "strawberry pickers" or seasonal farm workers are crowding into some units, with two or three families per apartment unit.
- Overcrowding was discussed at length. Residents wanted to know how to address this big issue. Property manager mentioned that the key is to have good on-site management.
- A resident brought up question about what can be done for veterans regarding housing options. Some of the responses included that there were specific mortgages for veterans, housing complexes targeting veterans, programs by HUD (HUD-VASH) specifically for veterans, programs to assist homeless veterans and specific local projects for veterans were identified (Village of Hope).
- Services of the Fair Housing Council of OC were presented and referral information provided to workshop participants.

Public Fair Housing Workshop # 3

Western Orange County Subregion: Costa Mesa, Fountain Valley, Huntington Beach, Newport Beach

September 24, 2015 - 6:00 to 7:30 pm

Fountain Valley City Hall, Council Chambers

Public Comments

- Comments were made that residents do not know who to call about discrimination issues.
- Some residents do not know they are being discriminated against and it was commented that lack of education on housing discrimination may be an impediment.
- Workshop attendees were informed that City websites have information on housing programs and resources that may be useful. Some cities, like Huntington Beach, also provide information on housing resources available through Orange County.
- A comment was made about how some struggling people do not have good access to computers, may have issues with literacy, and face other barriers which limit their access to housing resources. Many are close to being homeless once they have dropped down various rungs on the housing/economic ladder.
- There is not enough funding to help everyone.
- Some cities have walk-in hours open to the public for fair housing assistance scheduled each month at their city halls.
- Some cities, like Fountain Valley, have programs to help residents purchase a home. Education on the buying process is necessary for many.
- Housing affordability issue was brought up. Cities would prefer to have affordable units mixed in with market rate units.
- Retired police officer who is now volunteering with a non-profit property management group explained her organization's goals. In essence, they want to expand to other areas (North OC and others). She also stated that the biggest housing needs that her non-profit is noticing are housing for seniors and single parents.
- Resident requested PowerPoint presentation available and it was agreed that it would be put on website in the near future.

Public Fair Housing Workshop # 4

City of Santa Ana

September 30, 2015 - 6:00 to 7:30 pm

Santa Ana Police Community Room

Public Comments

- A resident said that there was discrimination against families with children. Asked who could be contacted regarding specific issues. (*Referred to Fair Housing Council of Orange County. Three staff from the Fair Housing Council were present at the workshop).*
- Person discussed situation where families with disabled children have difficulties finding apartments that do not have stairs.
- Some attendees were unclear which classes of people were protected against discrimination.
- Seniors have a difficult time finding housing they can afford as rents are too high relative to their fixed incomes.
- Single parent families have a hard time finding housing.
- Disabled seniors (wheelchair bound) do not know where to obtain housing.
- Affordable housing is a major issue in Santa Ana and Orange County as a whole. *(Issue was raised numerous times)*
- Residents discussed that they do not know where to go with discrimination problems.
- Resident asked about specific things that Fair Housing Council can do to help, and if they offered legal services.
- Some said that residents need help with foreclosure situation.
- Some residents feel overwhelmed by the documentation required by landlords to rent an apartment.
- The need for educational workshops on fair housing was brought up by a resident.
- There is the need to properly notify the public about the importance of housing workshops. (Consultant responded that the Fair Housing Council offers

workshops/services and let the attendees know that there were representatives from Fair Housing present at this public workshop meeting.)

- Resident asked about programs to assist them in their housing needs. (They were informed that cities have rehab programs and that they can find specific information on the cities' websites).
- Some landlords now have waiting lists for rental units. A resident commented that she would like to see the specific waiting list information as she thinks the waiting list is used to exclude applicants.
- A resident asked if AI report will cover the need for additional housing. (*She was informed that other documents address this specific information- the cities' Housing Elements, Consolidated Plans, etc.)*
- A question was asked about the draft AI being available for public review. (The draft AI will be made available on city websites and in hard copy at City Halls).
- Landlord requirements that were onerous to some tenants came up.
- Non-profit property manager mentioned that some tenants break rules (pets, overcrowding and others) and then expect owners not to enforce rules.
- Non-profit property manager said survey was one sided towards tenants and that landlords also have rights.
- The services of both the Fair Housing Council of Orange County, and the Fair Housing Foundation are important in Santa Ana to provide residents and landlords more choice/help with housing issues.

Public Fair Housing Workshop # 5

Southern Orange County Subregion: Lake Forest, Mission Viejo, Rancho

Santa Margarita, San Clemente

October 1, 2015 - 6:00 to 7:30 pm

Lake Forest City Hall – Community Room

Public Comments

- Motel Issue: Many residents use motels as apartments. In Costa Mesa there are various motels that are being converted to luxury condominiums. Does the AI report address motels? *(Other related reports, such as Housing Element address motel conversion issue).*
- Since apartment vacancies are so low, several attendees questioned if perhaps landlords were being too picky to the point of discrimination.
- If tenants discover they are being discriminated against – can they go to the police?
- There were 35 written surveys completed in San Clemente that were submitted at this public workshop.
- There were questions about how the AI will be implemented, and if 16 individual reports would be completed or one regional report.
- One of the goals of the AI Report is to show progress. A resident asked if a city has a poor record of addressing housing discrimination, is it possible to assess progress before the end of the five year period. (*Resident was informed that policies/actions would be addressed prior to the five year period, since many of these policies are also in the Housing Element. There is a yearly Action Plan, also CAPER, Consolidated Plan and other reports required by HUD that would ensure that there would be close scrutiny on cities' housing activities. If a city does not make the needed corrections, they may lose HUD funding. All cities have the similar goal to provide fair housing to all).*

Appendix A-2
Fair Housing Survey for Orange County Residents

A group of 16 Orange County cities[1] is conducting a study to evaluate fair housing conditions in their communities, and is interested in gathering information from residents on any experience they may have had with housing discrimination. Your input is greatly needed to provide a clear picture of the situation within these areas, which will in turn assist the group in developing a plan to improve equal and fair housing choice for all residents. Please take a few minutes to fill out this survey. Your answers will be kept confidential. You can also respond to the survey on-line at https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_ENGLISH**.** For additional information, please contact: Robert G. Vasquez, GRC Associates, Inc., (626) 331-6373, rvasquez@grcassoc.com.

1. ***Please identify the ZIP code of your residence.*** _____

2. ***Have you ever encountered any form of housing discrimination in one of the 16 Orange County cities?***
   - O YES City name _____
   - O NO
   - O NOT SURE

   (If YES or NOT SURE, proceed to questions 3-7.
   If NO, skip to question 8)

Examples of discrimination include:

- A rental advertisement that says, "Perfect for couples or singles without children" or "No Pets" without an exception for service animals.
- A real estate agent "steers" you to houses in neighborhoods different than the ones you have requested and think you can afford.
- A landlord refuses to let you install a ramp in your shower (at your own expense) to accommodate your disability.

3. ***If yes, which of the following best describes the person responsible for discriminating against you*?**
   - O A landlord/property manager
   - O A real estate agent
   - O A lending institution
   - O A City staff person
   - O Other: _____

4. ***Which of the following best describes the location where the act of discrimination occurred?***
   - O An apartment complex
   - O A single-family neighborhood
   - O A condominium development
   - O When applying for a loan
   - O A trailer or mobile home park
   - O A subsidized housing project
   - O When applying for City programs

5. ***Please explain how you believe you were discriminated against:*** _____

   _____

   _____

[1] The following 16 cities are participating in the regional Analysis of Impediments to Fair Housing Choice: Anaheim, Buena Park, Costa Mesa, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, La Habra, Lake Forest, Mission Viejo, Orange, Newport Beach, Rancho Santa Margarita, San Clemente, Santa Ana, and Tustin.

6. On what basis do you believe you were discriminated against? Check all that apply:

- O Race
- O Color
- O National Origin
- O Gender
- O Age
- O Religion
- O Family Status (e.g. due to children)
- O Disability
- O Ancestry
- O Sexual Orientation
- O Marital Status
- O Source of Income (i.e. welfare)
- O Other: _____

7. Did you report the incident?

- O YES - If Yes, who did you contact? _____
- O NO - If No, why not?
  - O Don't know where to report
  - O Too much trouble
  - O Other: _____
  - O Afraid of retaliation
  - O Don't believe it makes any difference

8. Have you ever been denied "reasonable accommodation" (flexibility) in rules, policies, or practices that you required to accommodate a disability related to housing?

- O YES
- O NO

If YES, what was your request? _____

_____

_____

9. How well informed do you feel yourself to be about housing discrimination laws?

- O Very well informed
- O Somewhat informed
- O A little informed
- O Not informed at all

10. What would you do if you encountered housing discrimination?

- O Tell the person you believe they are discriminating
- O Do nothing and seek other housing options
- O Report it
- O Wouldn't know what to do

11. Do you believe there is housing discrimination occurring in Orange County and, if so, what types of discrimination problems do you think are the worst? _____

_____

_____

Your input is greatly appreciated!

Please return the survey by **October 15, 2015** to:

Robert G. Vasquez, GRC Associates, Inc., 858 Oak Park Road, Suite 280, Covina, CA 91724

(626) 331-6373 (phone), (626) 331-6375 (fax), rvasquez@grcassoc.com

Appendix A-2
Encuesta de Vivienda Justa para los Residentes del Condado de Orange

Un grupo de 16 ciudades del Condado de Orange[1] está llevando a cabo un estudio para evaluar las condiciones de equidad de vivienda en sus comunidades y están interesados en recompilar información de los residentes acerca de cualquier experiencia discriminatoria que hayan tenido relacionada con viviendas. Su ayuda es necesaria para proporcionar una imagen clara de la situación dentro de estas áreas, que a su vez ayudara al grupo en el desarrollo de un plan para mejorar la elección justa y equitativa de viviendas para todos los residentes. Por favor tome unos minutos para llenar esta encuesta. Sus respuestas serán confidenciales. También puede responder a la encuesta en línea en el sitio web https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_SPANISH. Para obtener información adicional, por favor póngase en contacto con Robert G. Vasquez, GRC Associates, Inc., (626) 331-6373, rvasquez@grcassoc.com.

1. ***Por favor identifique el código postal de su hogar.*** _____

2. ***¿Alguna vez ha tenido alguna forma de discriminación de viviendas en una de las 16 ciudades del Condado de Orange?***

   O Si Nombre de Ciudad_____
   O NO
   O NO ESTOY SEGURO(A)

   (Si "SI" o "NO ESTOY SEGURO(A)", continúe con las preguntas 3-7. Si "NO", pase a la pregunta 8)

Ejemplos de discriminación incluyen:

- Un anuncio de alquiler que dice, "Perfecto para parejas o solteros sin hijos " o " no mascotas", sin una excepción para los animales de servicio.
- Un agente de bienes raíces que lo "dirige" a casas en barrios diferentes que las que usted había requerido y podría pagar.
- Un propietario le niega a usted de instalar una rampa en el baño (a su propio costo) para ayudarle con su discapacidad.

3. ***En caso afirmativo, ¿cuál de las siguientes opciones describe mejor la persona responsable de discriminar en contra de usted?***

   O Un administrador o manejador de la propiedad
   O Un agente de buenas raíces
   O Una institución de crédito
   O Personal de Ciudad
   O Otro: _____

4. ***¿Cuál de las siguientes opciones describe mejor el lugar donde ocurrió el acto de discriminación?***

   O Un apartamento
   O Un barrio de casas
   O Un proyecto de condominios
   O Al solicitar un préstamo
   O Un Remolque o complejo de casas móviles
   O Un complejo de viviendas subsidiadas
   O Al solicitar programas de la Ciudad

5. ***Por favor, explique cómo usted cree que fue discriminado:***

   _____

[1] Las siguientes 16 ciudades están participando en un estudio, el Análisis Regional de los Impedimentos para la Justa Selección de Viviendas: Anaheim, Buena Park, Costa Mesa, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, La Habra, Lake Forest, Mission Viejo, Orange, Newport Beach, Rancho Santa Margarita, San Clemente, Santa Ana, and Tustin.

_____

6. **¿Sobre qué base usted cree que fue discriminado? Marque todo lo que corresponda:**

- O Raza
- O Color
- O Origen Nacional
- O Género
- O Edad
- O Religión
- O Estado Familiar (e.g. debido a los niños)
- O Discapacidad
- O Linaje
- O Orientación Sexual
- O Estado Civil (Matrimonio)
- O Fuente de ingresos (ejemplo el bienestar)
- O Otro: _____

7. ***¿Denunció o reporto el incidente?***

- O SI – En caso afirmativo, ¿A quién contactó? _____
- O NO – En caso negativo, ¿Por qué no?
  - O No sabía a quién contactar
  - O Demasiados problemas
  - O Otro: _____
  - O Miedo de represalia
  - O No creí que haría ninguna diferencia

8. ***¿Alguna vez se le ha negado " ajustes razonables " (flexibilidad) en las reglas, políticas, o prácticas que se requieren para dar cabida a una discapacidad de usted relacionada con viviendas?***

- O SI
- O NO

Si afirmativo, ¿cuál era su petición? _____

_____

_____

9. ***¿Qué tan bien informado te sientes a ti mismo ser acerca de las leyes de discriminación de vivienda?***

- O Muy bien informado
- O Algo informado
- O Informado un poco
- O No informado en ninguna manera

10. ***¿Qué haría usted si usted encontrara discriminación de viviendas?***

- O Le diría a la persona que yo creo que ellos están discriminando
- O No haría nada y buscaría otras opciones de viviendas
- O Reportarlo
- O No sabría que hacer

11. ***¿Cree usted que está ocurriendo discriminación de viviendas en el Condado de Orange y, si es así, ¿qué tipos de problemas de discriminación cree usted que son los peores?***

_____

_____

¡Sus respuestas son muy apreciadas!

Por favor devuelva esta encuesta para el 15 de Octubre de 2015 para:

Robert G. Vasquez, GRC Associates, Inc., 858 Oak Park Road, Suite 280, Covina, CA 91724

(626) 331-6373 (phone), (626) 331-6375 (fax), rvasquez@grcassoc.com

Appendix A-2
오렌지 카운티 주민을 위한 공정한 주거 환경 설문조사

오렌지 카운티 내 16 개의 도시[1]로 구성된 그룹에서는 지역사회 내 공정한 주거 환경 평가를 위한 연구를 수행하고, 주민들로부터 주거 차별 경험에 대해 정보를 수집하고자 합니다. 귀하의 의견은 이 지역 내 상황을 명확하게 파악하기 위해 반드시 필요하며 이를 통해 본 그룹으로 하여금 모든 주민이 평등하고 공정한 주거 환경을 선택할 수 있는 계획을 개발하는 데 도움이 될 것입니다. 본 설문조사 작성을 위해 몇 분의 시간이 소요됩니다. 귀하의 답변은 기밀로 유지됩니다. 또한 https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_KOREAN. 에서 온라인 설문조사에 답변하실 수도 있습니다. 자세한 내용 Robert G. Vasquez, GRC Associates, Inc., (626) 331-6373, rvasquez@grcassoc.com 로 문의하시기 바랍니다.

차별의 예는 다음과 같습니다.

- "자녀가 없는 부부 또는 독신자에게 안성맞춤" 또는 장애인을 위한 보조 동물에 대한 예외 없이 "반려 동물 금지"라는 임대 광고.
- 부동산 중개업자가 귀하가 요청하고 형편에 맞다고 생각한 것과는 다른 지역의 주택을 선택하도록 "강요".
- 집주인이 귀하의 장애를 위해 (귀하의 비용으로) 샤워실에 경사로를 설치하는 것을 금지.

1. ***거주지의 우편 번호를 확인하십시오.*** _____

2. ***16 개의 오렌지 카운티 내 도시 중 어느 한 곳에서 주거 차별을 경험하신 적이 있습니까?***
   - o 예 도시 이름_____
   - o 아니오
   - o 확실하지 않음

   (예 또는 확실하지 않은 경우, 3-7 번 질문으로 이동합니다.아니오의 경우, 8 번 질문으로 이동합니다.)

3. **예라고 답한 경우, 다음 중 귀하에 대한 차별에 책임이 있는 사람을 가장 잘 설명한 것은 무엇입니까?**
   - o 집주인 / 부동산 관리
   - o 부동산 중개업자
   - o 대출 기관
   - o 시당국 직원
   - o 기타:_____

4. **다음 중 차별 행위가 발생한 장소를 가장 잘 설명한 것은 무엇입니까?**
   - o 아파트 단지
   - o 단독 주택 지역
   - o 콘도 개발
   - o 대출 신청시
   - o 트레일러 또는 이동 주택 공원
   - o 보조 주택 프로젝트
   - o 시 프로그램 적용시

5. ***어떻게 차별을 받았다고 생각하는지 설명해 주십시오.***_____
   _____
   _____

다음 16 개의 도시는 지역별로 공정 주거 선택에 장애가 되는 요인 분석에 참여하고 있습니다.
Anaheim, Buena Park, Costa Mesa, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, La Habra, Lake Forest, Mission Viejo, Orange, Newport Beach, Rancho Santa Margarita, San Clemente, Santa Ana, and Tustin.

6. *무엇을 기준으로 차별을 받았다고 생각하십니까? 해당 사항을 모두 체크하십시오.*

- o 인종
- o 피부색
- o 국적
- o 성별
- o 연령
- o 종교
- o 가족 관계 (예, 자녀)
- o 장애
- o 혈통
- o 성적 성향
- o 결혼 여부
- o 소득원 (예, 복지수당)
- o 기타:_____

7. *차별에 대해 보고하셨습니까?*

- o 예 – 예를 선택한 경우, 누구에게 연락하셨습니까?_____
- o 아니오 – 아니오를 선택한 경우, 왜 보고하지 않으셨습니까?
  - o 어디에 보고해야 하는지 모름
  - o 귀찮음
  - o 기타:_____
  - o 보복에 대한 두려움
  - o 차이가 없을 것이라고 생각함

8. *규칙, 정책 또는 관행에 있어 주거 지원에 관련된 장애를 위해 필요한 "합리적인 편의"(유연성)가 거부된 적이 있습니까?*

- o 예
- o 아니오

예라고 답한 경우, 귀하의 요구는 무엇이었습니까? _____

_____

_____

9. *주거 차별법에 대해 본인이 얼마나 잘 알고 있다고 생각하십니까?*

- o 매우 잘 알고 있음
- o 다소
- o 조금
- o 전혀 알지 못함

10. *주거 차별을 겪게 되는 경우 어떻게 하시겠습니까?*

- o 차별을 하고 있다고 당사자에게 말한다
- o 아무 것도 하지 않고 다른 주거 선택을 고려한다
- o 차별에 대해 보고한다
- o 무엇을 해야 할지 모르겠다

11. *오렌지 카운티에서 주거 차별이 발생하고 있다고 생각하십니까? 그렇다면 여러 차별 중 가장 심각하다고 생각하는 유형은 무엇입니까?*_____

_____

귀하의 의견에 대해 대단히 감사 드립니다!

2015 년 10 월 15 일 에 의해설문 조사를 보내주십시오:

Robert G. Vasquez, GRC Associates, Inc., 858 Oak Park Road, Suite 280, Covina, CA 91724

(626) 331-6373 (phone), (626) 331-6375 (fax), rvasquez@grcassoc.com

Appendix A-2
Khảo Sát Về Công Bằng Gia Cư Cho Cư Dân Orange County

Mười sáu thành phố trong Quận Cam[1] (Orange County) đang tiến hành một cuộc khảo sát để tìm hiểu về vấn đề công bằng gia cư (fair housing) trong cộng đồng. Các viên chức của cuộc khảo sát sẽ thu thập thông tin của cư dân liên quan đến việc kỳ thị trong vấn đề nhà ở. Chúng tôi rất cần các ý kiến đóng góp của quý vị để tìm hiểu thêm vấn đề này, từ đó hỗ trợ cho các thành phố phác thảo kế hoạch cải tiến quyền bình đẳng và công bằng về nhà ở cho cư dân. Xin vui lòng dành ra vài phút để điền vào bàn khảo sát dưới đây. Câu trả lời của quý vị sẽ được giữ kín. Quý vị cũng có thể điền vào bản khảo sát trên mạng tại địa chỉ: https://www.surveymonkey.com/r/OC-AI16CitiesSurvey_VIETNAMESE. Muốn biết thêm chi tiết, xin liên lạc: Robert G. Vasquez, GRC Associates, Inc., (626) 331-6373, rvasquez@grcassoc.com.

1. ***Cho biết mã số vùng nơi cư ngụ của quý vị (ZIP Code).*** _____

2. ***Có bao giờ quý vị bị kỳ thị về nhà ở tại một trong 16 thành phố ở Orange County?***
   - O CÓ Tên thành phố _____
   - O KHÔNG
   - O KHÔNG CHẮC

   (Nếu câu trả lời là CÓ hoặc KHÔNG CHẮC, trả lời tiếp từ câu 3 đến câu 7. Nếu câu trả lời là KHÔNG, tiếp tục trả lời câu số 8)

3. ***Nếu đã từng bị kỳ thị, quý vị nghĩ rằng những người/công ty/tổ chức nào dưới đây đã kỳ thị quý vị?***
   - O Chủ nhà /người quản lý khu gia cư (property manager)
   - O Chuyên viên địa ốc
   - O Nơi cho vay nợ
   - O Nhân viên Thành Phố
   - O Người/công ty/tổ chức không đề cập ở trên: _____

Ví dụ về phân biệt đối xử bao gồm:

- Mẫu rao vặt ghi: "Thích hợp cho vợ chồng hoặc người độc thân không có con nhỏ" hoặc "Không nhận thú nuôi". Mẫu rao vặt không đề cập đến trường hợp ngoại lệ cho phép các loại chó giúp đỡ cho người tàn tật (service animals).
- Chuyên viên địa ốc tự chuyển hướng kiếm nhà của quý vị sang một khu vực khác - không phải khu vực mà quý vị yêu cầu. Chuyên viên địa ốc nghĩ rằng ở khu vực khác quý vị mới có khả năng tài chính để mua nhà.
- Chủ nhà từ chối không cho phép quý vị, người bị tàn tật, lắp đặt "ramp" trong phòng tắm (với chi phí do quý vị tự trả). ["Ramp" - tấm nối 2 vị trí với 2 độ cao khác nhau, giúp người tàn tật di chuyển dễ dàng -]

4. ***Việc kỳ thị đã diễn ra tại địa điểm nào dưới đây?***
   - O Khu chung cư
   - O Khu nhà đơn (single-family neighborhood)
   - O Khu nhà condo
   - O Khi quý vị nộp đơn xin vay một khoản nợ
   - O Khu mobile home/trailer
   - O Trong một chương trình trợ cấp gia cư
   - O Khi quý vị nộp đơn cho một chương trình của Thành Phố

5. ***Giải thích tại sao quý vị tin rằng mình đã bị kỳ thi:***

_____

_____

(1) Danh sách 16 thành phố tham gia cuộc khảo sát về công bằng gia cư Analysis of Impediments to Fair Housing Choice: Anaheim, Buena Park, Costa Mesa, Fountain Valley, Fullerton, Garden Grove, Huntington Beach, La Habra, Lake Forest, Mission Viejo, Orange, Newport Beach, Rancho Santa Margarita, San Clemente, Santa Ana, and Tustin.

6. ***Quý vị nghĩ rằng mình đã bị kỳ thị bởi yếu tố nào dưới đây? Đánh dấu vào tất cả những yếu tố mà quý vị cho là bị kỳ thị:***
   - O Chủng tộc
   - O Màu da
   - O Quốc gia
   - O Giới tính
   - O Tuổi tác
   - O Tôn giáo
   - O Tình trạng gia đình (ví dụ: do có con nhỏ)
   - O Tàn tật
   - O Tổ tiên
   - O Xu hướng tính dục (Sexual Orientation)
   - O Tình trạng hôn nhân
   - O Nguồn lợi tức (ví dụ: do lãnh trợ cấp xã hội)
   - O Bị kỳ thi bởi các yếu tố khác, ghi ra: _____

7. ***Quý vị có báo cáo trường hợp bị kỳ thị không?***
   - O CÓ – Nếu CÓ, quý vị báo cáo cho ai? _____
   - O KHÔNG – Nếu KHÔNG, tại sao không báo cáo?
     - O Không biết báo cáo cho ai?
     - O Cảm thấy phiền phức quá
     - O Lý do khác: _____
     - O Lo sợ bị trả thù
     - O Cho rằng báo cáo cũng không làm được gì

8. ***Có bao giờ quý vị bị từ chối không được "Trợ Giúp Hợp Lý" ("Reasonable Accommodation") – Reasonable Accommodation là một sự uyển chuyển và thay đổi về chính sách, luật lệ, quy định nhằm giúp cho người bị tàn tật hưởng được quyền lợi công bằng về gia cư.***
   - O CÓ
   - O KHÔNG

   Nếu CÓ, đề nghị xin trợ giúp của quý vị là gì?

   _____

9. ***Quý vị nghĩ rằng mình đã được thông báo về các luật liên quan đến vấn đề kỳ thị gia cư ở mức nào?***
   - O Được thông báo đầy đủ
   - O Được thông báo không đầy đủ
   - O Được thông báo rất ít
   - O Không được thông báo

10. ***Quý vị sẽ làm gì nếu bị kỳ thị về nhà ở?***
    - O Cho người đó biết họ đang kỳ thị mình
    - O Báo cáo
    - O Không làm gì cả, đi kiếm nhà khác
    - O Không biết phải làm gì

11. ***Quý vị có nghĩ rằng có tình trạng kỳ thị gia cư tại Orange County. Nếu có, theo quý vị, hình thức kỳ thị nào là tồi tệ nhất?***

    _____

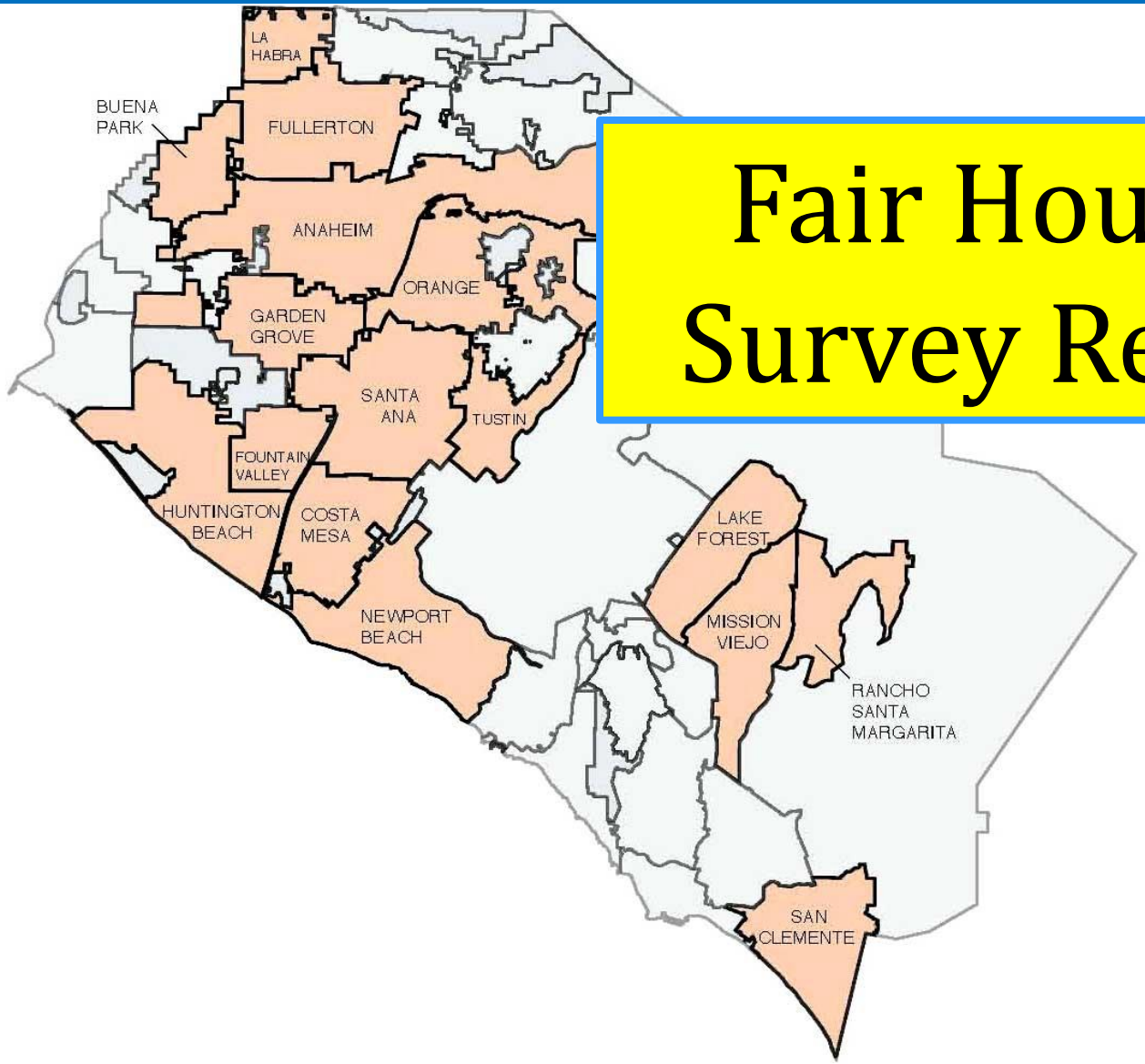
    _____

Cám ơn quý vị đã dành thì giờ cho cuộc khảo sát này!

Vui lòng gởi lại bản khảo sát trước ngày 15 tháng Mười, 2015 cho chúng tôi đến địa chỉ sau:

Robert G. Vasquez, GRC Associates, Inc., 858 Oak Park Road, Suite 280, Covina, CA 91724

16 Participating Orange County Cities



Fair Housing Survey Results

1. Number of Surveys Completed & Residence of Respondents Taking Survey

Total	English	Spanish	Vietnamese	Korean
188	76	110	2	0

Top 10 Zip Codes of Respondents' Residences

Num.	Zip Code	#
1	92701	54
2	92672	23
3	92703	19
4	92706	13
5	92673	9
6	92705	9
7	92704	7
8	92707	7
9	92708	6
10	92801	4
	Total	151
		82%

2. Have you ever encountered any form of housing discrimination in one of the 16 Orange County cities?

	Total %	Total	English	Spanish	Vietnamese
NO	36.3%	66	39	27	0
NOT SURE	7.1%	13	9	4	0
YES	56.6%	103	25	77	1
Total	100.0%	182	73	108	1

3. If yes, which of the following best describes the person responsible for discriminating against you?

	Total %	Total	English	Spanish	Vietnamese
A landlord/property manager	87.5%	98	30	67	1
A real estate agent	5.4%	6	0	6	0
A lending institution	1.8%	2	0	2	0
A City staff person	1.8%	2	1	1	0
Other:	3.6%	4	1	3	0
Total	100.0%	112	32	79	1

4. Which of the following best describes the location where the act of discrimination occurred?

Options	Total %	Response Count	English	Spanish	Vietnamese
An apartment complex	80.2%	89	23	66	0
A single-family neighborhood	10.8%	12	7	5	0
A condominium development	0.9%	1	1	0	0
When applying for a loan	1.8%	2	0	2	0
A trailer or mobile home park	4.5%	5	1	3	1
A subsidized housing project	0.0%	0	0	0	0
When applying for City programs	1.8%	2	1	1	0
Total	100.0%	111	33	77	1

5. Please explain how you believe you were discriminated against:

	Total	English	Spanish	Vietnamese
Answered question	105	27	77	1
Skipped question	83	49	33	1
Total	188	76	110	2

6. On what basis do you believe you were discriminated against? Check all that apply:

Options	Total %	Response Count	English	Spanish	Vietnamese
Race	42.9%	48	13	34	1
Color	29.5%	33	5	28	0
National Origin	35.7%	40	4	35	1
Gender	13.4%	15	4	11	0
Age	4.5%	5	2	3	0
Religion	0.0%	0	0	0	0
Family Status (e.g. due to children)	50.9%	57	12	45	0
Disability	12.5%	14	4	10	0
Ancestry	0.9%	1	1	0	0
Sexual Orientation	0.9%	1	1	0	0
Marital Status	9.8%	11	2	9	0
Source of Income (i.e. welfare)	35.7%	40	9	31	0
Other (please specify)	10.7%	12	9	3	0
Total		112	32	79	1

7. Did you report the incident?

Answer	Total %	Response Count	English	Spanish	Vietnamese
YES	9.2%	10	4	6	0
NO	90.8%	99	29	69	1
Total	**100.0%**	**109**	**29**	**69**	**1**

Source: 2007-2011 CHAS

8. Have you ever been denied “reasonable accommodation” (flexibility) in rules, policies, or practices that you required to accommodate a disability related to housing?

Answer	Total %	Total	English	Spanish	Vietnamese
YES	14.0%	23	8	15	0
NO	86.0%	141	58	82	1
Total	100.0%	164	66	97	1

9. How well informed do you feel yourself to be about housing discrimination laws?

Answer	Total %	Total	English	Spanish	Vietnamese
Very well informed	10.7%	18	16	2	0
Somewhat informed	15.4%	26	17	9	0
A little informed	33.7%	57	16	41	0
Not informed at all	40.2%	68	15	52	1
Total	100.0%	169	64	104	1

10. What would you do if you encountered housing discrimination?

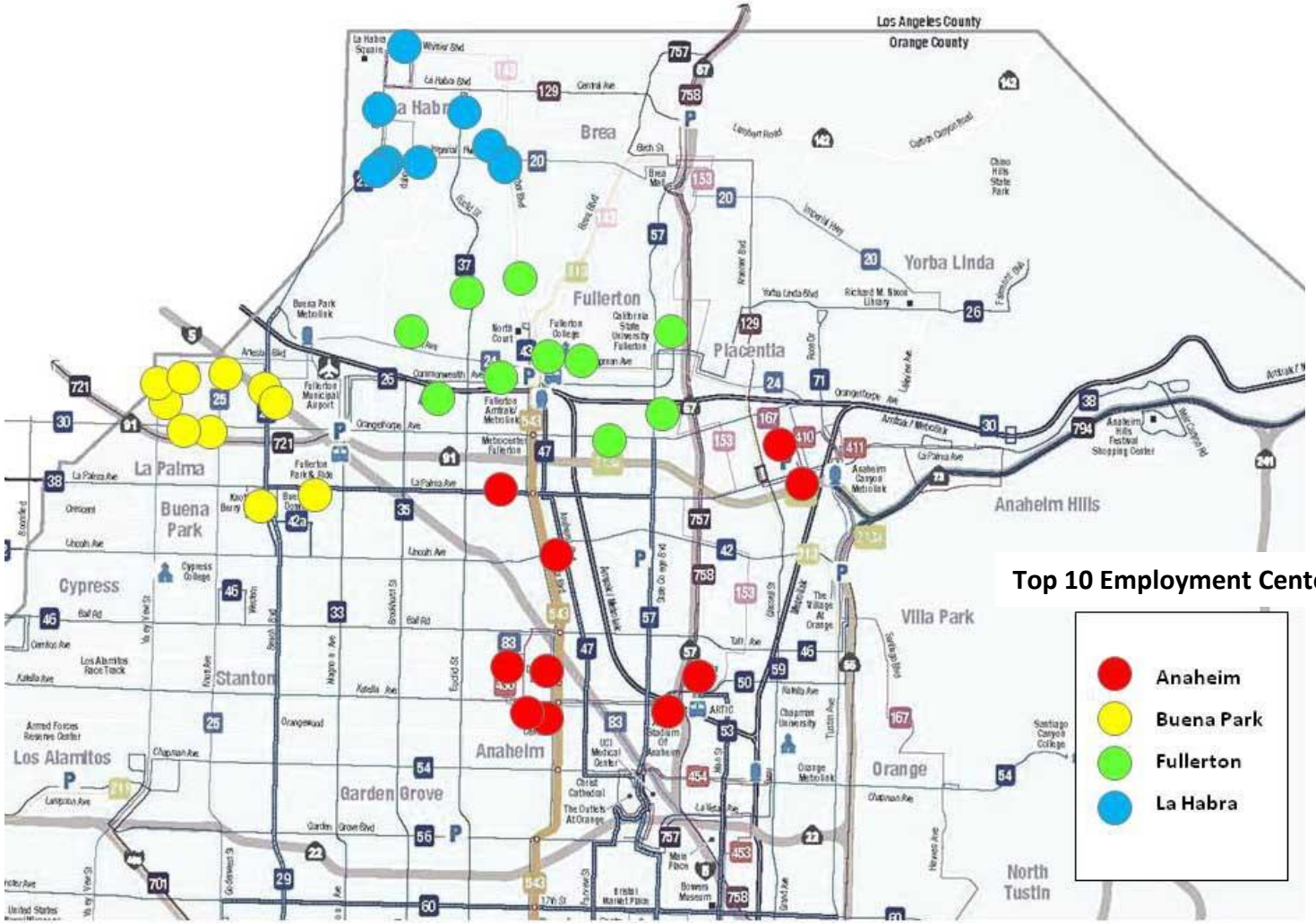
Answer	Total %	Total	English	Spanish	Vietnamese
Tell the person you believe they are discriminating	14.6%	24	11	13	0
Do nothing and seek other housing options	17.7%	29	8	21	0
Report it	34.8%	57	28	29	0
Wouldn't know what to do	32.9%	54	16	37	1
Total	**100.0%**	**164**	**63**	**100**	**1**

11. Do you believe there is housing discrimination occurring in Orange County and, if so, what types of discrimination

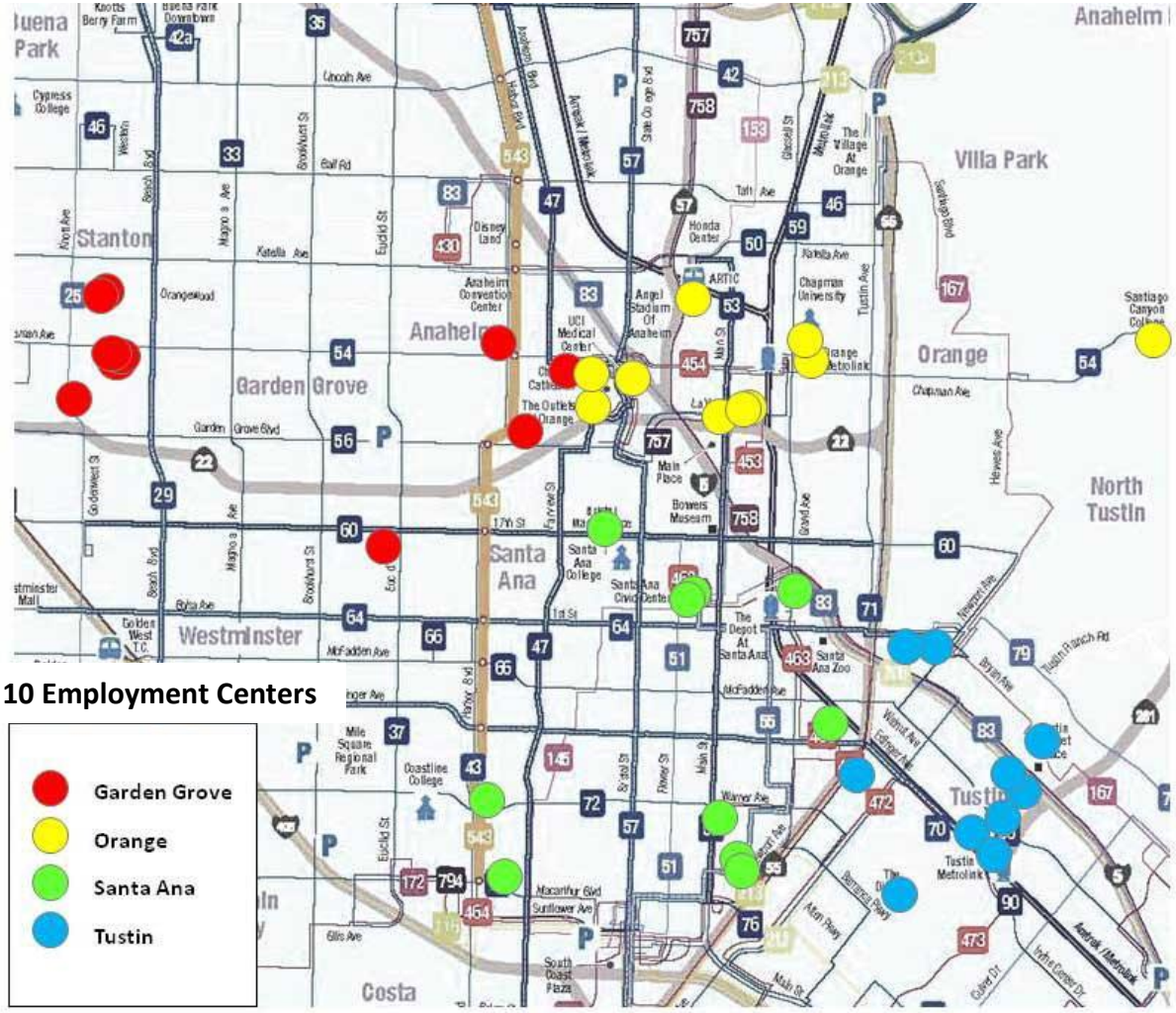
Answer	Total %	Total	English	Spanish	Vietnamese
Answered Question	76.1%	143	46	97	0
Skipped Question	23.9%	45	30	13	2
Total	100.0%	188	76	110	2

Appendix B: Public Transit and Major Employment Centers

Appendix B
Public Transit and Major Employment Centers



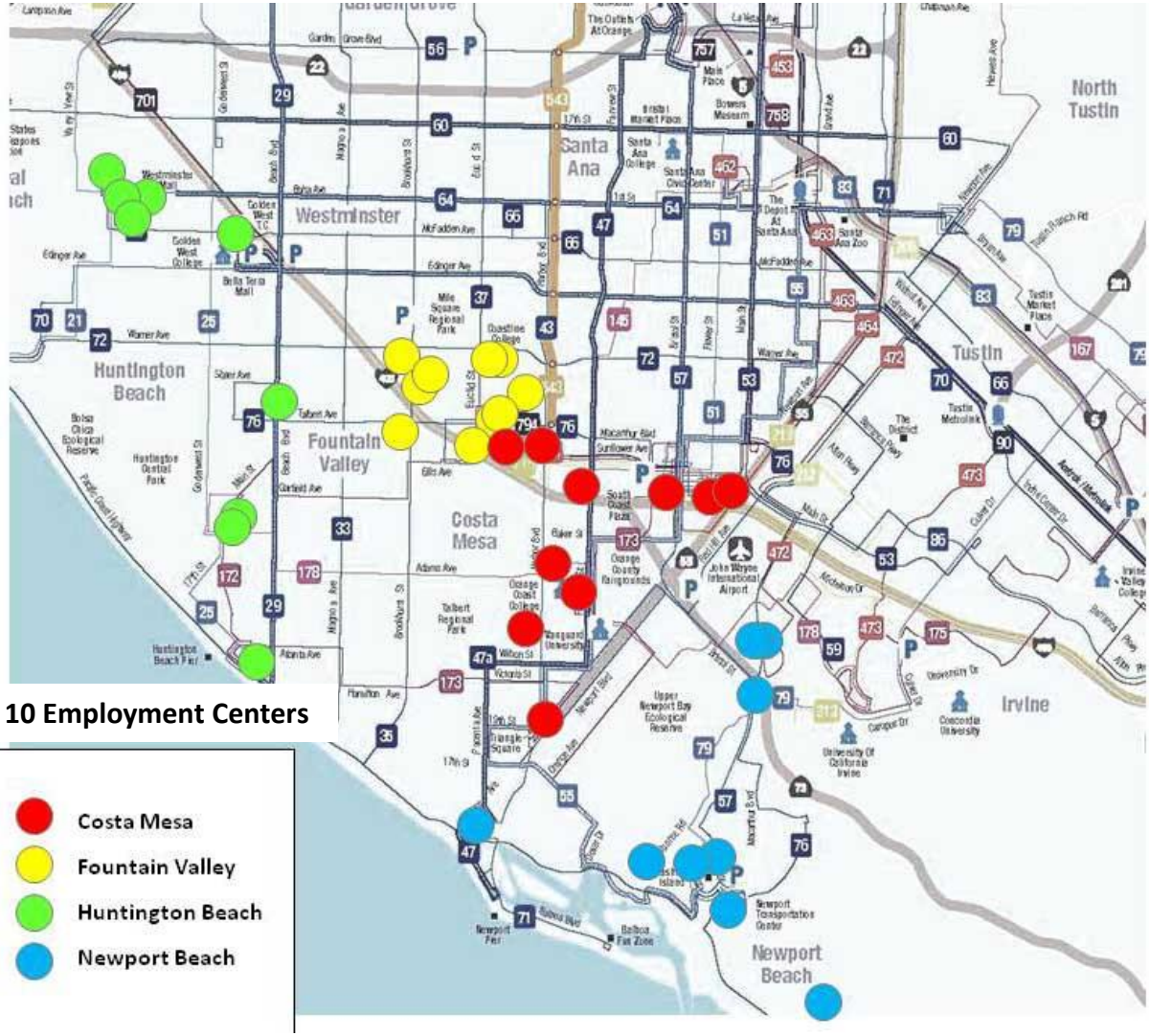
Appendix B
Public Transit and Major Employment Centers



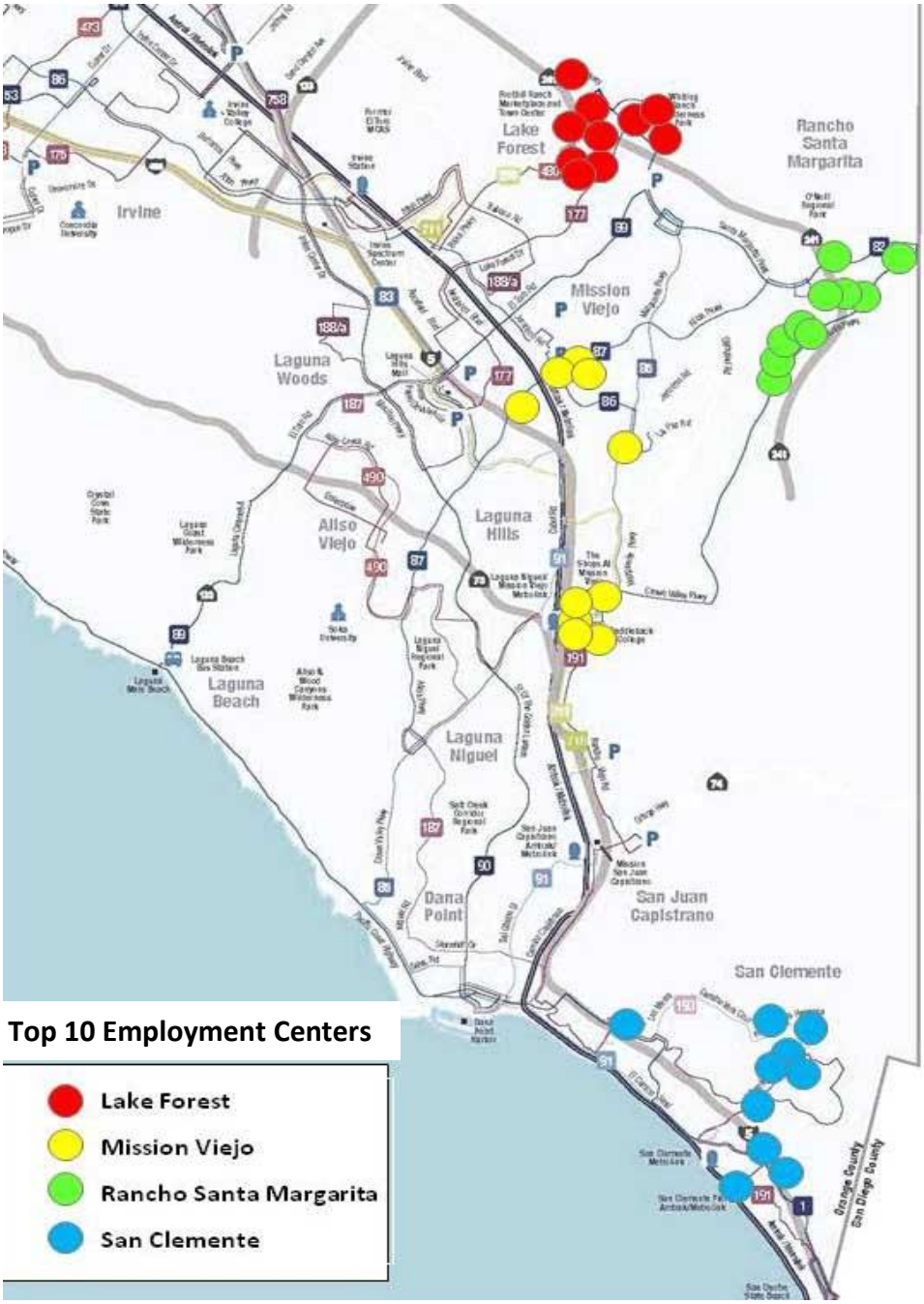
Top 10 Employment Centers

Appendix B

Public Transit and Major Employment Centers



Appendix B
Public Transit and Major Employment Centers



Appendix C: Mortgage Lending Practices

APPENDIX C-1: Home Purchase Loan Activities 2008-2013

APPENDIX C-2: Percent Of Denied Purchase Loans - By Census Tract - Applicant Race/Ethnicity

Appendix C-1

Home Purchase Loans - Completed Loan Applications Percent of Total

2008 - 2013

Cities	White						Black					
	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013
Anaheim	35%	34%	34%	35%	34%	37%	1.8%	1.0%	0.7%	1.0%	1.1%	0.8%
Buena Park	26%	27%	23%	28%	23%	22%	3.1%	1.9%	1.6%	1.7%	2.2%	0.8%
Costa Mesa	57%	62%	60%	60%	58%	61%	0.6%	0.6%	0.5%	0.7%	0.4%	0.4%
Fountain Valley	28%	26%	26%	26%	30%	30%	0.7%	0.4%	0.4%	0.3%	0.2%	0.6%
Fullerton	38%	33%	35%	36%	35%	32%	1.6%	1.0%	0.8%	0.9%	0.9%	0.8%
Garden Grove	21%	19%	19%	20%	18%	21%	1.1%	0.4%	0.4%	0.7%	0.9%	0.2%
Huntington Beach	63%	64%	62%	58%	61%	63%	0.6%	0.5%	0.6%	0.7%	0.4%	0.4%
La Habra	34%	34%	35%	35%	36%	33%	1.1%	1.3%	0.9%	1.8%	1.3%	1.1%
Lake Forest	58%	58%	49%	52%	47%	43%	1.2%	0.7%	0.7%	1.1%	1.3%	0.4%
Mission Viejo	67%	65%	64%	63%	66%	68%	1.1%	1.1%	1.0%	0.9%	0.8%	0.6%
Newport Beach	65%	67%	66%	65%	64%	63%	0.3%	0.3%	0.3%	0.5%	0.1%	0.2%
Orange	50%	46%	47%	51%	50%	52%	1.3%	0.6%	0.9%	0.9%	1.0%	0.6%
Rancho Santa Margarita	68%	68%	69%	67%	68%	68%	0.9%	1.5%	1.2%	1.3%	1.1%	1.1%
San Clemente	70%	72%	72%	75%	76%	76%	0.2%	0.3%	0.5%	0.1%	0.4%	0.3%
Santa Ana	26%	23%	23%	22%	23%	27%	0.9%	0.4%	0.9%	1.1%	0.6%	0.3%
Tustin	44%	39%	40%	42%	46%	51%	0.8%	0.5%	1.0%	1.2%	0.5%	0.4%
Orange County Total	**49%**	**47%**	**47%**	**48%**	**48%**	**49%**	**1.2%**	**0.8%**	**0.8%**	**0.9%**	**0.8%**	**0.6%**

Cities	Hispanic						Asian					
	2008	2009	2010	2011	2012	2013	2008	2009	2010	2011	2012	2013
Anaheim	26%	23%	21%	23%	22%	20%	24%	30%	32%	28%	30%	32%
Buena Park	24%	21%	17%	20%	18%	18%	34%	40%	47%	39%	45%	48%
Costa Mesa	9%	6%	5%	6%	6%	6%	17%	18%	20%	16%	19%	16%
Fountain Valley	5%	7%	5%	6%	7%	4%	56%	57%	58%	56%	54%	57%
Fullerton	20%	20%	19%	20%	15%	15%	27%	34%	35%	31%	39%	40%
Garden Grove	16%	12%	13%	12%	10%	13%	54%	60%	58%	58%	61%	57%
Huntington Beach	6%	6%	5%	5%	5%	5%	17%	19%	20%	20%	20%	19%
La Habra	34%	31%	27%	31%	25%	23%	20%	23%	26%	21%	28%	33%
Lake Forest	13%	10%	9%	11%	7%	6%	12%	17%	29%	23%	32%	39%
Mission Viejo	9%	9%	7%	8%	8%	6%	8%	11%	12%	12%	12%	12%
Newport Beach	3%	2%	2%	3%	2%	2%	10%	11%	14%	10%	14%	17%
Orange	15%	14%	11%	12%	12%	10%	19%	25%	27%	22%	23%	25%
Rancho Santa Margarita	7%	6%	6%	7%	7%	7%	8%	11%	9%	11%	10%	11%
San Clemente	3%	5%	5%	4%	4%	4%	4%	4%	5%	4%	4%	5%
Santa Ana	40%	38%	37%	39%	36%	31%	23%	28%	29%	28%	30%	31%
Tustin	17%	15%	13%	12%	14%	10%	25%	32%	32%	32%	28%	26%
Orange County Total	**16%**	**14%**	**12%**	**13%**	**11%**	**10%**	**23%**	**25%**	**27%**	**25%**	**27%**	**28%**

Source: www.lendingpatterns.com, October 2015

Tabulations: GRC Associates, Inc., October 2015

1 - Includes conventional and govt-assisted (FHA, FSA/RHS and VA) home purchase applications.

2 - Table includes all applications that went through the complete underwriting process,
and excludes applications withdrawn or files closed for incompleteness.

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Anaheim	0116.02	Low	25%	n/a	33%	33%	n/a	n/a	n/a	0%	28%	33%
Anaheim	0117.14	Low	0%	n/a	n/a	0%	n/a	n/a	n/a	n/a	0%	0%
Anaheim	0117.20	Low	n/a	n/a	25%	0%	n/a	n/a	n/a	33%	18%	14%
Anaheim	0117.22	Middle	38%	0%	0%	33%	n/a	n/a	n/a	n/a	27%	11%
Anaheim	0218.07	Upper	9%	n/a	33%	29%	0%	n/a	n/a	25%	16%	29%
Anaheim	0218.12	Middle	12%	n/a	15%	14%	n/a	n/a	n/a	29%	14%	15%
Anaheim	0218.13	Unk/NA	0%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0%	0%
Anaheim	0218.21	Middle	25%	0%	25%	15%	n/a	n/a	100%	0%	21%	21%
Anaheim	0218.26	Upper	6%	n/a	0%	0%	n/a	n/a	n/a	0%	3%	0%
Anaheim	0219.03	Middle	9%	n/a	14%	20%	n/a	n/a	n/a	50%	14%	17%
Anaheim	0219.05	Upper	0%	n/a	22%	6%	n/a	n/a	n/a	13%	7%	11%
Anaheim	0219.12	Upper	6%	n/a	17%	15%	0%	n/a	n/a	0%	8%	15%
Anaheim	0219.15	Upper	7%	n/a	0%	19%	n/a	n/a	100%	0%	10%	18%
Anaheim	0219.16	Upper	12%	n/a	43%	17%	n/a	n/a	0%	0%	15%	29%
Anaheim	0219.19	Middle	10%	n/a	0%	14%	n/a	n/a	n/a	20%	12%	11%
Anaheim	0219.20	Upper	15%	n/a	20%	10%	n/a	n/a	n/a	17%	14%	12%
Anaheim	0219.21	Upper	12%	n/a	0%	24%	n/a	n/a	0%	17%	16%	21%
Anaheim	0219.22	Upper	12%	0%	0%	6%	0%	n/a	0%	0%	8%	4%
Anaheim	0219.23	Upper	15%	100%	14%	9%	0%	n/a	n/a	0%	13%	11%
Anaheim	0219.24	Upper	0%	n/a	0%	7%	n/a	n/a	n/a	0%	2%	6%
Anaheim	0758.13	Upper	6%	0%	0%	9%	n/a	n/a	n/a	10%	7%	6%
Anaheim	0761.01	Middle	22%	n/a	13%	0%	n/a	n/a	n/a	67%	20%	10%
Anaheim	0761.02	Mod	0%	100%	0%	0%	n/a	n/a	n/a	0%	5%	8%
Anaheim	0762.02	Middle	13%	0%	14%	14%	0%	n/a	n/a	40%	15%	13%
Anaheim	0863.01	Mod	20%	n/a	17%	7%	0%	n/a	n/a	0%	14%	13%
Anaheim	0863.03	Mod	0%	100%	8%	6%	n/a	n/a	n/a	0%	5%	10%
Anaheim	0863.04	Middle	8%	n/a	9%	13%	0%	n/a	n/a	0%	8%	9%
Anaheim	0863.05	Middle	13%	0%	0%	13%	0%	n/a	n/a	25%	11%	7%
Anaheim	0863.06	Middle	0%	n/a	0%	0%	n/a	n/a	n/a	50%	4%	0%
Anaheim	0864.02	Mod	8%	50%	7%	0%	n/a	n/a	n/a	25%	9%	8%
Anaheim	0864.04	Mod	25%	n/a	42%	0%	n/a	0%	n/a	33%	25%	24%
Anaheim	0864.05	Mod	11%	n/a	25%	0%	n/a	n/a	n/a	0%	15%	17%
Anaheim	0864.06	Mod	0%	n/a	20%	25%	n/a	n/a	n/a	25%	16%	22%
Anaheim	0864.07	Mod	8%	n/a	17%	20%	n/a	n/a	n/a	33%	16%	19%
Anaheim	0865.01	Mod	19%	n/a	38%	20%	n/a	n/a	n/a	43%	29%	33%
Anaheim	0865.02	Mod	0%	n/a	31%	38%	n/a	n/a	n/a	25%	29%	33%
Anaheim	0866.01	Low	n/a	n/a	25%	8%	n/a	n/a	n/a	22%	17%	15%
Anaheim	0866.02	Mod	33%	0%	20%	17%	n/a	n/a	n/a	0%	21%	18%
Anaheim	0867.01	Mod	7%	n/a	12%	9%	0%	n/a	n/a	0%	9%	10%
Anaheim	0867.02	Mod	0%	n/a	30%	9%	n/a	n/a	n/a	25%	16%	19%
Anaheim	0868.01	Middle	44%	0%	33%	38%	0%	n/a	n/a	33%	36%	33%
Anaheim	0868.02	Mod	0%	0%	0%	0%	n/a	n/a	n/a	50%	4%	0%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Anaheim	0868.03	Mod	11%	0%	10%	11%	n/a	n/a	n/a	0%	9%	10%
Anaheim	0869.01	Mod	0%	0%	0%	14%	0%	n/a	n/a	0%	8%	12%
Anaheim	0869.02	Mod	11%	n/a	20%	0%	n/a	n/a	n/a	17%	10%	8%
Anaheim	0869.03	Mod	0%	n/a	0%	0%	n/a	n/a	n/a	n/a	0%	0%
Anaheim	0870.01	Mod	40%	n/a	13%	7%	n/a	n/a	n/a	20%	16%	9%
Anaheim	0870.02	Mod	11%	n/a	36%	27%	n/a	100%	n/a	25%	28%	35%
Anaheim	0871.01	Mod	0%	n/a	0%	0%	n/a	n/a	100%	0%	7%	17%
Anaheim	0871.02	Mod	11%	n/a	18%	23%	n/a	n/a	n/a	100%	23%	21%
Anaheim	0871.03	Middle	0%	0%	36%	17%	n/a	n/a	0%	29%	18%	21%
Anaheim	0871.05	Mod	14%	n/a	0%	14%	n/a	n/a	n/a	0%	11%	13%
Anaheim	0871.06	Low	20%	n/a	0%	27%	n/a	n/a	0%	10%	16%	18%
Anaheim	0872.00	Mod	21%	n/a	18%	9%	n/a	n/a	n/a	29%	19%	14%
Anaheim	0873.00	Low	12%	n/a	45%	17%	n/a	n/a	n/a	27%	20%	23%
Anaheim	0874.01	Middle	14%	0%	23%	5%	n/a	n/a	0%	29%	13%	11%
Anaheim	0874.03	Mod	33%	100%	50%	67%	n/a	n/a	n/a	33%	50%	60%
Anaheim	0874.04	Low	0%	0%	0%	0%	n/a	n/a	n/a	#DIV/0!	0%	0%
Anaheim	0874.05	Low	0%	n/a	67%	29%	n/a	n/a	n/a	0%	22%	40%
Anaheim	0875.03	Mod	21%	n/a	17%	50%	n/a	n/a	n/a	33%	32%	40%
Anaheim	0875.04	Low	0%	n/a	50%	50%	n/a	n/a	n/a	14%	28%	50%
Anaheim	0875.05	Low	9%	0%	n/a	20%	n/a	n/a	n/a	0%	13%	18%
Anaheim	0876.01	Mod	14%	n/a	0%	27%	0%	n/a	n/a	0%	15%	23%
Anaheim	0876.02	Middle	13%	n/a	27%	19%	0%	n/a	n/a	0%	17%	21%
Anaheim	0877.01	Mod	33%	n/a	33%	17%	n/a	n/a	n/a	50%	29%	25%
Anaheim	0877.03	Mod	0%	0%	40%	20%	n/a	n/a	n/a	17%	18%	24%
Anaheim	0877.04	Middle	7%	n/a	18%	17%	100%	0%	n/a	50%	17%	19%
Anaheim	0878.01	Mod	0%	0%	8%	23%	n/a	0%	n/a	0%	11%	17%
Anaheim	0878.02	Mod	36%	0%	40%	36%	0%	n/a	n/a	0%	31%	34%
Anaheim	0878.03	Low	50%	n/a	0%	0%	n/a	n/a	n/a	20%	13%	0%
Anaheim	0878.05	Mod	50%	100%	33%	28%	n/a	n/a	n/a	50%	36%	32%
Anaheim	0878.06	Low	20%	n/a	18%	20%	n/a	n/a	n/a	0%	16%	19%
Anaheim	0883.02	Middle	13%	n/a	17%	26%	n/a	n/a	n/a	50%	24%	25%
Anaheim	0884.02	Mod	0%	n/a	0%	10%	n/a	n/a	n/a	0%	7%	9%
Anaheim	0884.03	Mod	14%	0%	36%	19%	n/a	n/a	n/a	20%	21%	23%
Anaheim	1102.01	Mod	6%	n/a	40%	10%	0%	n/a	0%	0%	14%	18%
Anaheim	1102.02	Mod	0%	n/a	20%	23%	n/a	n/a	n/a	11%	17%	22%
Anaheim	1102.03	Middle	20%	n/a	25%	48%	n/a	n/a	n/a	0%	31%	39%
Anaheim	1104.01	Middle	13%	n/a	17%	0%	n/a	n/a	n/a	0%	8%	9%
Anaheim	1104.02	Middle	15%	100%	9%	14%	0%	n/a	n/a	0%	14%	15%
Anaheim	9800.00	Unk/NA	0%	n/a	n/a	0%	n/a	n/a	n/a	n/a	0%	0%
Anaheim	**Total**		**13%**	**23%**	**21%**	**16%**	**5%**	**25%**	**36%**	**16%**	**16%**	**18%**
Buena Park	0018.01	Mod	0%	n/a	40%	13%	n/a	n/a	n/a	0%	14%	23%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Buena Park	0868.01	Middle	44%	0%	33%	38%	0%	n/a	n/a	33%	36%	33%
Buena Park	0868.03	Mod	11%	0%	10%	11%	n/a	n/a	n/a	0%	9%	10%
Buena Park	1101.02	Middle	0%	n/a	0%	19%	n/a	n/a	n/a	14%	14%	16%
Buena Park	1101.10	Mod	0%	n/a	17%	27%	0%	n/a	n/a	0%	21%	24%
Buena Park	1102.01	Mod	6%	n/a	40%	10%	0%	n/a	0%	0%	14%	18%
Buena Park	1102.02	Mod	0%	n/a	20%	23%	n/a	n/a	n/a	11%	17%	22%
Buena Park	1102.03	Middle	20%	n/a	25%	48%	n/a	n/a	n/a	0%	31%	39%
Buena Park	1103.01	Middle	0%	n/a	0%	10%	0%	n/a	n/a	25%	7%	6%
Buena Park	1103.02	Middle	20%	n/a	25%	25%	0%	0%	n/a	38%	25%	23%
Buena Park	1103.03	Middle	17%	n/a	11%	13%	n/a	n/a	n/a	67%	17%	12%
Buena Park	1103.04	Middle	17%	n/a	14%	18%	0%	n/a	n/a	0%	15%	17%
Buena Park	1104.01	Middle	13%	n/a	17%	0%	n/a	n/a	n/a	0%	8%	9%
Buena Park	1104.02	Middle	15%	100%	9%	14%	0%	n/a	n/a	0%	14%	15%
Buena Park	1105.00	Mod	0%	0%	17%	14%	n/a	n/a	n/a	0%	10%	14%
Buena Park	1106.03	Low	50%	0%	50%	50%	100%	n/a	n/a	0%	45%	50%
Buena Park	1106.04	Middle	0%	n/a	0%	19%	n/a	n/a	50%	20%	16%	19%
Buena Park	1106.06	Mod	50%	0%	0%	29%	n/a	n/a	n/a	50%	31%	22%
Buena Park	1106.07	Middle	0%	n/a	0%	15%	n/a	n/a	n/a	n/a	11%	14%
Buena Park	**Total**		**13%**	**17%**	**20%**	**20%**	**13%**	**0%**	**33%**	**13%**	**18%**	**20%**
Costa Mesa	0626.10	Mod	14%	n/a	33%	24%	0%	n/a	n/a	31%	19%	24%
Costa Mesa	0631.01	Mod	31%	n/a	n/a	25%	n/a	n/a	n/a	20%	28%	25%
Costa Mesa	0631.02	Middle	12%	n/a	13%	0%	n/a	n/a	n/a	19%	13%	8%
Costa Mesa	0631.03	Upper	19%	n/a	0%	n/a	n/a	n/a	0%	0%	15%	0%
Costa Mesa	0632.01	Middle	14%	n/a	100%	0%	n/a	n/a	n/a	13%	15%	50%
Costa Mesa	0632.02	Middle	12%	0%	0%	0%	n/a	n/a	n/a	0%	8%	0%
Costa Mesa	0633.01	Middle	6%	n/a	n/a	n/a	n/a	n/a	100%	0%	8%	100%
Costa Mesa	0633.02	Upper	14%	n/a	50%	0%	n/a	n/a	0%	13%	14%	17%
Costa Mesa	0636.01	Middle	13%	n/a	0%	0%	n/a	n/a	n/a	25%	14%	0%
Costa Mesa	0636.03	Middle	17%	n/a	0%	0%	n/a	n/a	n/a	8%	14%	0%
Costa Mesa	0636.04	Mod	11%	n/a	0%	n/a	n/a	n/a	n/a	0%	7%	0%
Costa Mesa	0636.05	Low	0%	0%	0%	0%	n/a	n/a	n/a	20%	6%	0%
Costa Mesa	0637.01	Mod	0%	n/a	n/a	0%	n/a	n/a	n/a	0%	0%	0%
Costa Mesa	0637.02	Mod	18%	0%	20%	14%	n/a	n/a	n/a	31%	20%	15%
Costa Mesa	0638.02	Upper	11%	n/a	n/a	0%	n/a	n/a	n/a	0%	8%	0%
Costa Mesa	0638.03	Middle	11%	n/a	0%	0%	0%	n/a	0%	20%	10%	0%
Costa Mesa	0638.05	Upper	8%	n/a	0%	14%	n/a	n/a	n/a	50%	12%	13%
Costa Mesa	0638.06	Middle	16%	n/a	n/a	0%	n/a	n/a	n/a	33%	19%	0%
Costa Mesa	0638.07	Middle	20%	n/a	0%	0%	n/a	n/a	n/a	0%	15%	0%
Costa Mesa	0638.08	Mod	20%	n/a	38%	33%	n/a	n/a	n/a	0%	24%	36%
Costa Mesa	0639.02	Middle	6%	n/a	67%	17%	n/a	n/a	n/a	33%	17%	33%
Costa Mesa	0639.03	Mod	7%	n/a	20%	100%	n/a	n/a	n/a	20%	17%	50%

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Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Costa Mesa	0639.04	Mod	0%	n/a	0%	13%	0%	n/a	n/a	40%	11%	10%
Costa Mesa	0639.05	Middle	0%	0%	0%	0%	n/a	n/a	n/a	50%	3%	0%
Costa Mesa	0639.06	Mod	13%	n/a	25%	0%	n/a	n/a	0%	20%	16%	21%
Costa Mesa	0639.07	Middle	18%	0%	50%	38%	n/a	n/a	n/a	11%	21%	36%
Costa Mesa	0639.08	Middle	25%	n/a	0%	0%	n/a	n/a	n/a	17%	16%	0%
Costa Mesa	0755.15	Middle	20%	n/a	20%	16%	100%	n/a	n/a	18%	18%	18%
Costa Mesa	0992.40	Upper	17%	n/a	0%	0%	n/a	n/a	0%	14%	15%	0%
Costa Mesa	**Total**		**14%**	**0%**	**20%**	**17%**	**25%**	**n/a**	**17%**	**18%**	**16%**	**18%**
Fountain Valley	0992.02	Mod	0%	n/a	0%	15%	0%	n/a	n/a	25%	13%	13%
Fountain Valley	0992.03	Middle	29%	n/a	0%	37%	n/a	n/a	n/a	#DIV/0!	33%	34%
Fountain Valley	0992.04	Middle	40%	n/a	0%	44%	n/a	n/a	n/a	100%	44%	42%
Fountain Valley	0992.23	Mod	13%	n/a	0%	25%	n/a	n/a	n/a	100%	23%	24%
Fountain Valley	0992.24	Upper	0%	n/a	0%	36%	n/a	n/a	n/a	0%	24%	33%
Fountain Valley	0992.25	Upper	0%	n/a	n/a	35%	n/a	n/a	n/a	0%	27%	35%
Fountain Valley	0992.26	Middle	0%	n/a	n/a	38%	n/a	n/a	n/a	0%	24%	38%
Fountain Valley	0992.27	Mod	16%	0%	0%	14%	0%	n/a	n/a	0%	13%	12%
Fountain Valley	0992.29	Middle	33%	0%	0%	13%	n/a	n/a	n/a	0%	18%	11%
Fountain Valley	0992.30	Middle	14%	n/a	0%	6%	n/a	n/a	n/a	0%	9%	5%
Fountain Valley	0992.31	Upper	6%	n/a	0%	26%	n/a	n/a	n/a	8%	15%	24%
Fountain Valley	0992.32	Upper	15%	n/a	0%	31%	n/a	n/a	n/a	0%	21%	27%
Fountain Valley	0992.33	Middle	0%	n/a	0%	0%	n/a	n/a	n/a	50%	7%	0%
Fountain Valley	0992.34	Middle	0%	n/a	n/a	6%	n/a	n/a	n/a	25%	7%	6%
Fountain Valley	0992.50	Middle	0%	n/a	n/a	20%	n/a	n/a	n/a	50%	22%	20%
Fountain Valley	0992.51	Mod	0%	n/a	0%	12%	0%	n/a	100%	0%	11%	13%
Fountain Valley	**Total**		**13%**	**0%**	**0%**	**21%**	**0%**	**n/a**	**100%**	**15%**	**18%**	**20%**
Fullerton	0014.04	Mod	0%	n/a	38%	50%	n/a	n/a	n/a	50%	30%	42%
Fullerton	0015.03	Middle	10%	100%	0%	8%	0%	n/a	0%	25%	11%	10%
Fullerton	0015.05	Middle	17%	n/a	0%	12%	n/a	0%	0%	33%	15%	10%
Fullerton	0016.01	Middle	9%	n/a	11%	14%	n/a	n/a	n/a	0%	10%	13%
Fullerton	0016.02	Upper	4%	n/a	0%	17%	n/a	n/a	n/a	14%	11%	15%
Fullerton	0017.04	Middle	0%	0%	33%	18%	n/a	n/a	n/a	10%	16%	19%
Fullerton	0017.05	Middle	13%	n/a	0%	0%	n/a	n/a	n/a	29%	11%	0%
Fullerton	0017.06	Upper	21%	n/a	0%	15%	n/a	0%	n/a	0%	13%	14%
Fullerton	0017.07	Upper	6%	n/a	0%	6%	0%	n/a	n/a	20%	6%	6%
Fullerton	0017.08	Middle	7%	n/a	0%	5%	67%	n/a	n/a	0%	9%	12%
Fullerton	0018.01	Mod	0%	n/a	40%	13%	n/a	n/a	n/a	0%	14%	23%
Fullerton	0018.02	Mod	0%	n/a	11%	10%	n/a	n/a	n/a	17%	8%	11%
Fullerton	0019.01	Middle	0%	0%	50%	0%	n/a	n/a	n/a	n/a	25%	33%
Fullerton	0019.02	Mod	0%	n/a	0%	0%	n/a	n/a	n/a	0%	25%	0%
Fullerton	0019.03	Middle	25%	n/a	0%	45%	n/a	n/a	n/a	0%	0%	31%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Fullerton	0110.00	Middle	5%	0%	22%	10%	0%	n/a	n/a	0%	7%	13%
Fullerton	0111.01	Middle	13%	0%	40%	0%	n/a	n/a	n/a	0%	12%	13%
Fullerton	0111.02	Middle	11%	0%	6%	29%	0%	n/a	n/a	0%	13%	16%
Fullerton	0112.00	Middle	0%	0%	8%	17%	n/a	n/a	n/a	0%	5%	10%
Fullerton	0113.00	Middle	30%	n/a	0%	29%	0%	n/a	n/a	40%	29%	26%
Fullerton	0114.01	Upper	8%	n/a	n/a	0%	n/a	n/a	n/a	0%	6%	0%
Fullerton	0114.02	Upper	0%	n/a	0%	20%	n/a	n/a	0%	0%	5%	11%
Fullerton	0114.03	Mod	4%	0%	18%	10%	0%	n/a	n/a	13%	9%	13%
Fullerton	0115.02	Mod	13%	0%	0%	29%	n/a	n/a	n/a	25%	15%	13%
Fullerton	0115.03	Upper	0%	n/a	n/a	0%	n/a	n/a	n/a	50%	5%	0%
Fullerton	0115.04	Mod	20%	n/a	0%	0%	0%	n/a	n/a	60%	19%	0%
Fullerton	0116.01	Mod	18%	n/a	7%	13%	n/a	100%	0%	14%	14%	12%
Fullerton	0116.02	Low	25%	n/a	33%	33%	n/a	n/a	n/a	0%	28%	33%
Fullerton	0117.07	Middle	8%	n/a	13%	0%	n/a	n/a	n/a	0%	5%	3%
Fullerton	0117.08	Middle	13%	n/a	0%	31%	n/a	n/a	n/a	17%	18%	25%
Fullerton	0117.11	Mod	20%	n/a	0%	9%	n/a	n/a	n/a	0%	10%	6%
Fullerton	0117.12	Middle	13%	n/a	0%	22%	n/a	n/a	n/a	20%	14%	13%
Fullerton	0867.01	Mod	7%	n/a	12%	9%	0%	n/a	n/a	0%	9%	10%
Fullerton	0868.01	Middle	44%	0%	33%	38%	0%	n/a	n/a	33%	36%	33%
Fullerton	0868.02	Mod	0%	0%	0%	0%	n/a	n/a	n/a	50%	4%	0%
Fullerton	1104.01	Middle	13%	n/a	17%	0%	n/a	n/a	n/a	0%	8%	9%
Fullerton	1106.04	Middle	0%	n/a	0%	19%	n/a	n/a	50%	20%	16%	19%
Fullerton	1106.05	Middle	0%	n/a	n/a	10%	n/a	n/a	n/a	67%	12%	10%
Fullerton	**Total**		**10%**	**7%**	**14%**	**14%**	**17%**	**33%**	**17%**	**13%**	**13%**	**14%**
Garden Grove	0761.03	Mod	0%	n/a	20%	22%	n/a	n/a	n/a	50%	17%	21%
Garden Grove	0875.03	Mod	21%	n/a	17%	50%	n/a	n/a	n/a	33%	32%	40%
Garden Grove	0876.02	Middle	13%	n/a	27%	19%	0%	n/a	n/a	0%	17%	21%
Garden Grove	0878.06	Low	20%	n/a	18%	20%	n/a	n/a	n/a	0%	16%	19%
Garden Grove	0879.01	Middle	17%	n/a	38%	15%	0%	n/a	n/a	33%	24%	23%
Garden Grove	0879.02	Mod	0%	n/a	29%	33%	n/a	n/a	n/a	0%	28%	32%
Garden Grove	0880.01	Middle	0%	n/a	0%	31%	n/a	n/a	n/a	25%	22%	27%
Garden Grove	0880.02	Middle	20%	n/a	50%	29%	n/a	n/a	n/a	0%	27%	30%
Garden Grove	0881.01	Middle	0%	0%	25%	27%	n/a	n/a	0%	0%	16%	24%
Garden Grove	0881.04	Mod	27%	n/a	0%	25%	n/a	n/a	n/a	n/a	23%	20%
Garden Grove	0881.05	Mod	33%	n/a	0%	16%	n/a	n/a	100%	0%	18%	17%
Garden Grove	0881.06	Mod	8%	n/a	0%	31%	n/a	n/a	n/a	14%	17%	22%
Garden Grove	0881.07	Mod	0%	n/a	n/a	29%	n/a	n/a	n/a	0%	24%	29%
Garden Grove	0882.01	Mod	0%	n/a	0%	19%	n/a	n/a	0%	0%	10%	17%
Garden Grove	0882.02	Middle	13%	n/a	0%	23%	n/a	n/a	n/a	0%	14%	17%
Garden Grove	0882.03	Mod	0%	n/a	25%	19%	n/a	n/a	n/a	0%	16%	19%
Garden Grove	0883.01	Middle	40%	n/a	50%	22%	n/a	n/a	n/a	20%	28%	25%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Garden Grove	0883.02	Middle	13%	n/a	17%	26%	n/a	n/a	n/a	50%	24%	25%
Garden Grove	0884.01	Middle	25%	n/a	9%	35%	n/a	n/a	n/a	n/a	26%	26%
Garden Grove	0884.02	Mod	0%	n/a	0%	10%	n/a	n/a	n/a	0%	7%	9%
Garden Grove	0884.03	Mod	14%	0%	36%	19%	n/a	n/a	n/a	20%	21%	23%
Garden Grove	0885.01	Mod	33%	n/a	20%	14%	0%	n/a	n/a	33%	19%	14%
Garden Grove	0885.02	Mod	0%	n/a	33%	30%	0%	n/a	0%	100%	27%	29%
Garden Grove	0886.01	Mod	11%	n/a	13%	13%	n/a	n/a	n/a	25%	13%	13%
Garden Grove	0886.02	Middle	25%	n/a	25%	32%	n/a	n/a	n/a	0%	26%	30%
Garden Grove	0887.01	Mod	33%	n/a	33%	3%	n/a	n/a	n/a	33%	12%	6%
Garden Grove	0887.02	Mod	0%	n/a	50%	31%	n/a	n/a	n/a	n/a	31%	32%
Garden Grove	0888.01	Mod	18%	n/a	100%	21%	n/a	n/a	n/a	100%	24%	24%
Garden Grove	0888.02	Mod	33%	n/a	60%	27%	n/a	n/a	n/a	50%	34%	33%
Garden Grove	0889.01	Mod	25%	n/a	0%	27%	n/a	n/a	0%	67%	31%	26%
Garden Grove	0889.02	Mod	100%	n/a	0%	15%	n/a	n/a	n/a	100%	22%	14%
Garden Grove	0889.03	Mod	n/a	n/a	0%	37%	n/a	n/a	0%	n/a	32%	32%
Garden Grove	0889.04	Mod	50%	n/a	n/a	47%	n/a	n/a	n/a	n/a	47%	47%
Garden Grove	0890.01	Mod	n/a	n/a	0%	4%	n/a	n/a	n/a	0%	3%	4%
Garden Grove	0890.03	Mod	0%	n/a	0%	28%	n/a	n/a	n/a	0%	23%	26%
Garden Grove	0891.02	Mod	14%	n/a	16%	19%	n/a	n/a	n/a	0%	16%	18%
Garden Grove	0891.04	Low	0%	n/a	30%	11%	n/a	n/a	n/a	0%	18%	21%
Garden Grove	0891.06	Low	n/a	n/a	100%	75%	n/a	n/a	n/a	100%	80%	78%
Garden Grove	0891.07	Middle	0%	n/a	18%	23%	n/a	n/a	n/a	50%	23%	22%
Garden Grove	0992.03	Middle	29%	n/a	0%	37%	n/a	n/a	n/a	n/a	33%	34%
Garden Grove	0998.01	Mod	0%	n/a	25%	18%	n/a	n/a	n/a	50%	19%	19%
Garden Grove	0999.02	Middle	0%	n/a	0%	20%	n/a	n/a	n/a	100%	14%	17%
Garden Grove	0999.03	Mod	0%	n/a	0%	14%	n/a	n/a	n/a	0%	11%	13%
Garden Grove	0999.05	Middle	14%	n/a	n/a	0%	n/a	n/a	n/a	n/a	10%	0%
Garden Grove	0999.06	Upper	6%	n/a	0%	33%	n/a	n/a	n/a	0%	12%	24%
Garden Grove	1100.01	Middle	9%	n/a	0%	25%	100%	n/a	n/a	0%	13%	27%
Garden Grove	1100.03	Middle	6%	n/a	0%	0%	n/a	n/a	n/a	0%	4%	0%
Garden Grove	1100.04	Middle	13%	100%	0%	0%	n/a	n/a	0%	0%	8%	8%
Garden Grove	1100.05	Middle	0%	n/a	0%	20%	0%	n/a	n/a	0%	3%	10%
Garden Grove	1100.10	Upper	19%	n/a	33%	19%	n/a	n/a	n/a	0%	18%	21%
Garden Grove	**Total**		**13%**	**50%**	**19%**	**23%**	**17%**	**n/a**	**14%**	**19%**	**20%**	**23%**
Huntington Beach	0992.12	Mod	10%	n/a	n/a	25%	n/a	n/a	n/a	33%	17%	25%
Huntington Beach	0992.14	Middle	15%	n/a	0%	0%	n/a	n/a	n/a	0%	11%	0%
Huntington Beach	0992.15	Middle	14%	0%	13%	0%	0%	n/a	0%	0%	9%	4%
Huntington Beach	0992.16	Middle	6%	n/a	0%	0%	n/a	n/a	0%	60%	12%	0%
Huntington Beach	0992.17	Middle	23%	n/a	n/a	0%	n/a	n/a	n/a	0%	21%	0%
Huntington Beach	0992.20	Middle	14%	0%	25%	6%	0%	n/a	n/a	30%	14%	9%
Huntington Beach	0992.35	Mod	0%	n/a	0%	22%	n/a	n/a	n/a	14%	7%	18%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Huntington Beach	0992.37	Upper	0%	n/a	0%	11%	n/a	n/a	n/a	0%	3%	10%
Huntington Beach	0992.38	Upper	6%	n/a	0%	20%	n/a	n/a	n/a	50%	11%	17%
Huntington Beach	0992.39	Upper	8%	n/a	0%	13%	n/a	n/a	n/a	13%	9%	10%
Huntington Beach	0992.40	Upper	17%	n/a	0%	0%	n/a	n/a	0%	14%	15%	0%
Huntington Beach	0992.41	Middle	14%	n/a	0%	27%	n/a	n/a	n/a	n/a	22%	25%
Huntington Beach	0992.42	Middle	0%	n/a	50%	22%	n/a	n/a	0%	0%	11%	25%
Huntington Beach	0992.43	Upper	9%	0%	0%	60%	n/a	n/a	0%	29%	13%	27%
Huntington Beach	0992.44	Middle	13%	n/a	0%	20%	n/a	0%	n/a	50%	13%	11%
Huntington Beach	0992.45	Upper	13%	n/a	0%	40%	n/a	n/a	n/a	0%	17%	33%
Huntington Beach	0992.46	Upper	10%	0%	0%	17%	n/a	n/a	n/a	17%	12%	14%
Huntington Beach	0993.05	Mod	15%	n/a	0%	0%	n/a	n/a	n/a	20%	14%	0%
Huntington Beach	0993.06	Middle	8%	n/a	50%	31%	n/a	n/a	n/a	18%	14%	33%
Huntington Beach	0993.07	Upper	13%	n/a	25%	67%	n/a	n/a	n/a	14%	19%	43%
Huntington Beach	0993.08	Upper	3%	n/a	50%	16%	n/a	n/a	n/a	6%	7%	22%
Huntington Beach	0993.09	Upper	17%	n/a	0%	29%	n/a	0%	n/a	17%	17%	17%
Huntington Beach	0993.10	Upper	13%	n/a	0%	38%	n/a	n/a	n/a	0%	14%	33%
Huntington Beach	0993.11	Upper	14%	n/a	40%	25%	100%	n/a	n/a	13%	19%	33%
Huntington Beach	0994.02	Mod	10%	n/a	0%	0%	n/a	n/a	n/a	25%	10%	0%
Huntington Beach	0994.04	Upper	0%	0%	0%	0%	n/a	0%	n/a	0%	18%	0%
Huntington Beach	0994.05	Middle	12%	n/a	0%	0%	n/a	n/a	n/a	0%	0%	0%
Huntington Beach	0994.06	Middle	5%	n/a	33%	0%	n/a	n/a	n/a	0%	6%	9%
Huntington Beach	0994.07	Upper	24%	n/a	0%	0%	n/a	n/a	n/a	33%	19%	0%
Huntington Beach	0994.08	Upper	5%	0%	0%	0%	n/a	n/a	n/a	20%	5%	0%
Huntington Beach	0994.10	Mod	20%	n/a	n/a	0%	n/a	n/a	n/a	100%	15%	0%
Huntington Beach	0994.11	Mod	9%	0%	0%	17%	n/a	n/a	n/a	20%	12%	14%
Huntington Beach	0994.12	Upper	16%	n/a	33%	0%	n/a	n/a	n/a	0%	13%	11%
Huntington Beach	0994.13	Upper	13%	0%	0%	13%	0%	n/a	0%	29%	13%	8%
Huntington Beach	0994.15	Upper	4%	n/a	n/a	27%	n/a	n/a	n/a	0%	11%	27%
Huntington Beach	0994.16	Mod	19%	n/a	0%	0%	n/a	n/a	n/a	17%	16%	0%
Huntington Beach	0994.17	Upper	13%	n/a	0%	36%	0%	n/a	n/a	26%	19%	27%
Huntington Beach	0995.08	Middle	12%	n/a	50%	50%	n/a	n/a	n/a	0%	16%	50%
Huntington Beach	0995.13	Upper	25%	n/a	0%	38%	n/a	n/a	n/a	0%	24%	25%
Huntington Beach	0995.14	Upper	3%	n/a	0%	18%	n/a	n/a	n/a	7%	7%	16%
Huntington Beach	0996.02	Middle	0%	n/a	25%	0%	n/a	n/a	n/a	50%	13%	8%
Huntington Beach	0996.03	Upper	6%	n/a	38%	7%	0%	n/a	n/a	20%	12%	17%
Huntington Beach	0996.04	Upper	13%	n/a	0%	0%	n/a	n/a	n/a	0%	8%	0%
Huntington Beach	0996.05	Middle	6%	n/a	n/a	15%	100%	n/a	n/a	0%	10%	21%
Huntington Beach	0997.02	Middle	40%	0%	0%	25%	50%	n/a	n/a	33%	28%	24%
Huntington Beach	0997.03	Middle	18%	n/a	50%	47%	n/a	n/a	n/a	0%	34%	47%
Huntington Beach	**Total**		**11%**	**0%**	**13%**	**19%**	**33%**	**0%**	**0%**	**16%**	**13%**	**18%**
La Habra	0011.01	Middle	13%	0%	10%	9%	n/a	n/a	n/a	25%	11%	9%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
La Habra	0011.02	Mod	8%	0%	11%	0%	n/a	n/a	n/a	20%	8%	5%
La Habra	0011.03	Mod	0%	0%	17%	0%	0%	n/a	n/a	0%	8%	13%
La Habra	0012.01	Mod	23%	n/a	15%	14%	n/a	n/a	n/a	0%	17%	15%
La Habra	0012.02	Middle	14%	0%	20%	20%	n/a	n/a	n/a	0%	17%	19%
La Habra	0013.01	Middle	7%	50%	23%	14%	n/a	n/a	n/a	0%	15%	21%
La Habra	0013.03	Mod	25%	n/a	32%	5%	0%	n/a	n/a	25%	22%	20%
La Habra	0013.04	Mod	17%	n/a	33%	17%	n/a	n/a	n/a	0%	21%	24%
La Habra	0014.01	Mod	29%	0%	15%	29%	0%	n/a	n/a	0%	21%	18%
La Habra	0014.02	Middle	0%	n/a	0%	40%	n/a	n/a	n/a	17%	15%	25%
La Habra	0014.03	Upper	10%	n/a	10%	0%	n/a	n/a	n/a	0%	9%	9%
La Habra	0014.04	Mod	0%	n/a	38%	50%	n/a	n/a	n/a	50%	30%	42%
La Habra	0015.01	Middle	17%	0%	33%	22%	n/a	n/a	0%	38%	24%	26%
La Habra	0016.01	Middle	9%	n/a	11%	14%	n/a	n/a	n/a	0%	10%	13%
La Habra	0017.05	Middle	13%	n/a	0%	0%	n/a	n/a	n/a	29%	11%	0%
La Habra	0017.07	Upper	6%	n/a	0%	6%	0%	n/a	n/a	20%	6%	6%
La Habra	0017.08	Middle	7%	n/a	0%	5%	67%	n/a	n/a	0%	9%	12%
La Habra	**Total**		**13%**	**10%**	**21%**	**12%**	**29%**	**n/a**	**0%**	**19%**	**15%**	**15%**
Lake Forest	0320.14	Mod	11%	n/a	22%	30%	85%	n/a	n/a	40%	31%	44%
Lake Forest	0320.27	Middle	11%	n/a	31%	15%	75%	0%	100%	0%	16%	31%
Lake Forest	0320.29	Upper	9%	n/a	22%	18%	0%	n/a	n/a	20%	13%	18%
Lake Forest	0320.47	Middle	11%	n/a	11%	0%	n/a	n/a	n/a	0%	8%	6%
Lake Forest	0524.04	Unk/NA	9%	n/a	0%	7%	0%	n/a	n/a	43%	9%	7%
Lake Forest	0524.08	Upper	13%	n/a	0%	0%	0%	n/a	n/a	33%	11%	0%
Lake Forest	0524.10	Middle	13%	n/a	0%	15%	n/a	n/a	0%	0%	12%	13%
Lake Forest	0524.11	Middle	19%	0%	0%	13%	n/a	n/a	n/a	17%	16%	8%
Lake Forest	0524.15	Upper	14%	0%	17%	20%	0%	n/a	n/a	8%	14%	18%
Lake Forest	0524.16	Middle	14%	0%	29%	33%	0%	n/a	0%	13%	17%	26%
Lake Forest	0524.22	Upper	7%	n/a	20%	10%	n/a	n/a	n/a	0%	7%	13%
Lake Forest	0524.23	Middle	21%	n/a	17%	31%	n/a	n/a	n/a	0%	23%	29%
Lake Forest	0524.24	Middle	19%	0%	14%	0%	n/a	n/a	n/a	50%	18%	5%
Lake Forest	0524.25	Middle	14%	n/a	0%	10%	0%	n/a	n/a	0%	10%	6%
Lake Forest	0524.26	Upper	13%	0%	0%	15%	n/a	0%	33%	11%	14%	15%
Lake Forest	0524.27	Upper	19%	0%	0%	8%	n/a	n/a	n/a	0%	12%	7%
Lake Forest	0524.28	Upper	10%	0%	0%	13%	n/a	n/a	n/a	20%	11%	11%
Lake Forest	**Total**		**13%**	**0%**	**14%**	**14%**	**58%**	**0%**	**33%**	**13%**	**14%**	**15%**
Mission Viejo	0320.02	Middle	10%	n/a	20%	0%	n/a	n/a	n/a	11%	10%	9%
Mission Viejo	0320.03	Upper	20%	n/a	0%	0%	0%	n/a	0%	25%	18%	0%
Mission Viejo	0320.12	Upper	11%	0%	0%	0%	n/a	n/a	n/a	0%	9%	0%
Mission Viejo	0320.13	Middle	15%	n/a	50%	0%	n/a	n/a	n/a	0%	14%	25%
Mission Viejo	0320.15	Upper	8%	n/a	0%	13%	n/a	n/a	0%	0%	6%	8%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Mission Viejo	0320.20	Upper	7%	n/a	25%	14%	0%	n/a	n/a	9%	9%	17%
Mission Viejo	0320.22	Mod	10%	0%	17%	14%	n/a	n/a	n/a	33%	14%	13%
Mission Viejo	0320.27	Middle	11%	n/a	31%	15%	75%	0%	100%	0%	16%	31%
Mission Viejo	0320.28	Middle	14%	n/a	40%	20%	100%	n/a	n/a	11%	18%	29%
Mission Viejo	0320.30	Upper	12%	0%	0%	17%	n/a	n/a	n/a	29%	13%	8%
Mission Viejo	0320.31	Upper	7%	n/a	0%	25%	0%	n/a	n/a	0%	7%	13%
Mission Viejo	0320.32	Upper	7%	n/a	n/a	0%	n/a	n/a	n/a	20%	9%	0%
Mission Viejo	0320.33	Middle	15%	n/a	14%	29%	n/a	0%	n/a	22%	18%	20%
Mission Viejo	0320.34	Upper	3%	0%	0%	8%	n/a	n/a	n/a	20%	6%	6%
Mission Viejo	0320.35	Upper	26%	n/a	0%	40%	100%	0%	n/a	0%	24%	25%
Mission Viejo	0320.36	Upper	9%	n/a	0%	0%	n/a	n/a	n/a	0%	7%	0%
Mission Viejo	0320.37	Middle	7%	100%	0%	44%	n/a	n/a	n/a	8%	11%	38%
Mission Viejo	0320.38	Upper	14%	n/a	0%	20%	n/a	n/a	n/a	19%	15%	15%
Mission Viejo	0320.39	Upper	8%	0%	11%	14%	0%	0%	n/a	25%	11%	12%
Mission Viejo	0320.40	Upper	9%	n/a	0%	50%	0%	n/a	n/a	0%	10%	25%
Mission Viejo	0320.47	Middle	11%	n/a	11%	0%	n/a	n/a	n/a	0%	8%	6%
Mission Viejo	0320.48	Upper	7%	0%	0%	13%	0%	n/a	n/a	10%	8%	9%
Mission Viejo	0320.49	Upper	10%	0%	0%	0%	0%	n/a	n/a	6%	7%	0%
Mission Viejo	0320.58	Upper	10%	0%	0%	16%	50%	n/a	0%	17%	12%	14%
Mission Viejo	0320.61	Upper	19%	n/a	0%	0%	n/a	n/a	n/a	7%	16%	0%
Mission Viejo	0423.15	Upper	10%	50%	0%	11%	n/a	n/a	100%	18%	13%	21%
Mission Viejo	0423.28	Upper	10%	n/a	0%	0%	n/a	n/a	n/a	67%	20%	0%
Mission Viejo	0423.33	Upper	16%	0%	n/a	0%	0%	n/a	n/a	18%	14%	0%
Mission Viejo	0524.23	Middle	21%	n/a	17%	31%	n/a	n/a	n/a	0%	23%	29%
Mission Viejo	0524.28	Upper	10%	0%	0%	13%	n/a	n/a	n/a	20%	11%	11%
Mission Viejo	**Total**		**11%**	**13%**	**12%**	**16%**	**32%**	**0%**	**33%**	**14%**	**12%**	**15%**
Newport Beach	0626.04	Upper	17%	n/a	25%	15%	n/a	n/a	n/a	23%	17%	16%
Newport Beach	0626.10	Mod	14%	n/a	33%	24%	0%	n/a	n/a	31%	19%	24%
Newport Beach	0626.14	Middle	17%	0%	0%	33%	n/a	n/a	n/a	0%	17%	20%
Newport Beach	0626.42	Upper	16%	n/a	n/a	0%	100%	n/a	n/a	10%	14%	14%
Newport Beach	0626.43	Upper	9%	0%	0%	11%	n/a	0%	n/a	21%	12%	10%
Newport Beach	0626.44	Upper	16%	0%	0%	0%	n/a	n/a	n/a	12%	13%	0%
Newport Beach	0626.45	Upper	11%	n/a	0%	12%	n/a	n/a	n/a	29%	14%	11%
Newport Beach	0627.01	Upper	20%	n/a	n/a	50%	n/a	n/a	n/a	11%	18%	50%
Newport Beach	0627.02	Upper	16%	n/a	0%	0%	n/a	n/a	0%	17%	15%	0%
Newport Beach	0628.00	Upper	23%	n/a	n/a	29%	0%	n/a	0%	14%	20%	20%
Newport Beach	0629.00	Upper	5%	n/a	n/a	n/a	n/a	n/a	n/a	0%	4%	#DIV/0!
Newport Beach	0630.04	Upper	12%	n/a	25%	0%	n/a	0%	n/a	8%	11%	11%
Newport Beach	0630.05	Upper	0%	n/a	n/a	0%	n/a	n/a	n/a	0%	18%	0%
Newport Beach	0630.06	Upper	8%	n/a	n/a	0%	n/a	n/a	n/a	0%	0%	0%
Newport Beach	0630.07	Upper	5%	n/a	0%	7%	n/a	n/a	n/a	5%	5%	5%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Newport Beach	0630.08	Upper	20%	n/a	n/a	0%	n/a	n/a	n/a	0%	17%	0%
Newport Beach	0630.09	Upper	14%	n/a	n/a	17%	n/a	n/a	n/a	18%	16%	17%
Newport Beach	0630.10	Upper	19%	n/a	0%	20%	n/a	n/a	0%	9%	16%	11%
Newport Beach	0631.01	Mod	31%	n/a	n/a	25%	n/a	n/a	n/a	20%	28%	25%
Newport Beach	0631.03	Upper	19%	n/a	0%	n/a	n/a	n/a	0%	0%	15%	0%
Newport Beach	0633.02	Upper	14%	n/a	50%	0%	n/a	n/a	0%	13%	14%	17%
Newport Beach	0634.00	Upper	10%	n/a	0%	20%	n/a	0%	n/a	13%	10%	14%
Newport Beach	0635.00	Upper	22%	100%	n/a	0%	n/a	0%	n/a	22%	20%	9%
Newport Beach	0636.01	Middle	13%	n/a	0%	0%	n/a	n/a	n/a	25%	14%	0%
Newport Beach	0636.03	Middle	17%	n/a	0%	0%	n/a	n/a	n/a	8%	14%	0%
Newport Beach	0636.04	Mod	11%	n/a	0%	n/a	n/a	n/a	n/a	0%	7%	0%
Newport Beach	**Total**		**15%**	**25%**	**11%**	**15%**	**33%**	**0%**	**0%**	**15%**	**15%**	**14%**
City of Orange	0219.12	Upper	6%	n/a	17%	15%	0%	n/a	n/a	0%	8%	15%
City of Orange	0219.13	Middle	16%	100%	17%	20%	n/a	n/a	n/a	0%	17%	22%
City of Orange	0219.14	Upper	22%	n/a	0%	10%	n/a	0%	n/a	0%	12%	6%
City of Orange	0219.15	Upper	7%	n/a	0%	19%	n/a	n/a	100%	0%	10%	18%
City of Orange	0219.17	Upper	13%	n/a	0%	40%	n/a	n/a	n/a	20%	16%	25%
City of Orange	0219.18	Upper	7%	n/a	36%	22%	0%	n/a	0%	0%	12%	25%
City of Orange	0219.20	Upper	15%	n/a	20%	10%	n/a	n/a	n/a	17%	14%	12%
City of Orange	0219.23	Upper	15%	100%	14%	9%	0%	n/a	n/a	0%	13%	11%
City of Orange	0219.24	Upper	0%	n/a	0%	7%	n/a	n/a	n/a	0%	2%	6%
City of Orange	0524.19	Upper	14%	n/a	0%	17%	n/a	n/a	n/a	29%	16%	13%
City of Orange	0524.20	Upper	15%	n/a	46%	12%	0%	n/a	0%	29%	16%	14%
City of Orange	0756.04	Upper	17%	n/a	0%	12%	n/a	0%	100%	31%	18%	14%
City of Orange	0756.05	Upper	11%	n/a	56%	14%	0%	n/a	n/a	43%	18%	29%
City of Orange	0758.05	Middle	13%	n/a	17%	0%	n/a	n/a	n/a	0%	10%	11%
City of Orange	0758.06	Middle	4%	n/a	13%	38%	n/a	n/a	n/a	33%	13%	25%
City of Orange	0758.07	Middle	0%	n/a	0%	22%	n/a	n/a	100%	0%	8%	23%
City of Orange	0758.08	Upper	14%	n/a	0%	10%	n/a	n/a	n/a	0%	9%	7%
City of Orange	0758.09	Upper	6%	n/a	n/a	0%	n/a	n/a	n/a	14%	7%	0%
City of Orange	0758.10	Upper	5%	n/a	0%	18%	n/a	n/a	n/a	0%	8%	15%
City of Orange	0758.11	Mod	14%	n/a	0%	50%	0%	n/a	n/a	50%	23%	25%
City of Orange	0758.12	Mod	0%	75%	0%	0%	0%	n/a	0%	0%	8%	20%
City of Orange	0758.13	Upper	6%	0%	0%	9%	n/a	n/a	n/a	10%	7%	6%
City of Orange	0758.14	Upper	25%	n/a	50%	13%	n/a	n/a	0%	0%	19%	18%
City of Orange	0758.15	Middle	10%	n/a	14%	11%	n/a	n/a	n/a	25%	14%	13%
City of Orange	0758.16	Middle	14%	50%	33%	20%	n/a	n/a	n/a	0%	18%	25%
City of Orange	0759.01	Mod	24%	0%	0%	50%	n/a	n/a	100%	0%	24%	40%
City of Orange	0759.02	Mod	9%	n/a	33%	50%	n/a	n/a	n/a	0%	14%	38%
City of Orange	0760.00	Mod	25%	100%	0%	26%	0%	100%	n/a	25%	25%	24%
City of Orange	0761.01	Middle	22%	n/a	13%	0%	n/a	n/a	n/a	67%	20%	10%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
City of Orange	0761.02	Mod	0%	100%	0%	0%	n/a	n/a	n/a	0%	5%	8%
City of Orange	0761.03	Mod	0%	n/a	20%	22%	n/a	n/a	n/a	50%	17%	21%
City of Orange	0762.01	Middle	8%	0%	0%	22%	0%	0%	n/a	23%	13%	15%
City of Orange	0762.02	Middle	13%	0%	14%	14%	0%	n/a	n/a	40%	15%	13%
City of Orange	0762.04	Mod	17%	n/a	13%	0%	0%	n/a	n/a	25%	15%	11%
City of Orange	0762.05	Middle	8%	n/a	0%	0%	n/a	n/a	n/a	17%	8%	0%
City of Orange	0762.06	Middle	14%	n/a	0%	40%	0%	n/a	n/a	33%	17%	29%
City of Orange	0762.08	Middle	9%	n/a	13%	13%	n/a	n/a	0%	0%	9%	12%
City of Orange	**Total**		**12%**	**57%**	**15%**	**15%**	**0%**	**40%**	**44%**	**17%**	**14%**	**16%**
Rancho SM	0320.34	Upper	3%	0%	0%	8%	n/a	n/a	n/a	20%	6%	6%
Rancho SM	0320.37	Middle	7%	100%	0%	44%	n/a	n/a	n/a	8%	11%	38%
Rancho SM	0320.38	Upper	14%	n/a	0%	20%	n/a	n/a	n/a	19%	15%	15%
Rancho SM	0320.41	Upper	11%	n/a	0%	0%	n/a	n/a	n/a	0%	6%	0%
Rancho SM	0320.42	Upper	16%	n/a	0%	0%	n/a	n/a	n/a	20%	15%	0%
Rancho SM	0320.43	Upper	9%	0%	0%	22%	n/a	n/a	n/a	0%	9%	18%
Rancho SM	0320.44	Upper	12%	0%	9%	32%	n/a	100%	0%	14%	15%	24%
Rancho SM	0320.45	Upper	8%	n/a	0%	0%	n/a	n/a	0%	0%	6%	0%
Rancho SM	0320.48	Upper	7%	0%	0%	13%	0%	n/a	n/a	10%	8%	9%
Rancho SM	0320.49	Upper	10%	0%	0%	0%	0%	n/a	n/a	6%	7%	0%
Rancho SM	0320.50	Upper	12%	50%	0%	0%	n/a	n/a	0%	23%	12%	6%
Rancho SM	0320.51	Middle	7%	67%	8%	11%	n/a	100%	n/a	0%	10%	20%
Rancho SM	0320.53	Upper	12%	0%	23%	0%	n/a	n/a	67%	12%	13%	14%
Rancho SM	0320.54	Middle	13%	0%	25%	0%	n/a	n/a	0%	33%	14%	10%
Rancho SM	0320.55	Middle	9%	n/a	33%	20%	n/a	n/a	n/a	11%	11%	25%
Rancho SM	0320.56	Upper	13%	n/a	9%	20%	n/a	n/a	n/a	10%	13%	15%
Rancho SM	**Total**		**10%**	**22%**	**11%**	**14%**	**0%**	**100%**	**25%**	**12%**	**11%**	**14%**
San Clemente	0320.23	Upper	7%	0%	10%	17%	0%	n/a	0%	12%	8%	12%
San Clemente	0421.03	Upper	14%	n/a	33%	n/a	0%	n/a	0%	8%	13%	17%
San Clemente	0421.06	Middle	6%	n/a	33%	n/a	n/a	n/a	n/a	0%	10%	33%
San Clemente	0421.07	Mod	20%	n/a	0%	n/a	n/a	n/a	n/a	17%	19%	0%
San Clemente	0421.08	Middle	18%	n/a	0%	0%	n/a	100%	n/a	17%	18%	20%
San Clemente	0421.09	Middle	6%	n/a	0%	0%	0%	n/a	n/a	8%	6%	0%
San Clemente	0421.11	Upper	11%	n/a	0%	33%	n/a	n/a	n/a	20%	13%	25%
San Clemente	0421.12	Upper	8%	0%	0%	29%	n/a	n/a	n/a	12%	9%	20%
San Clemente	0421.13	Middle	5%	n/a	20%	0%	n/a	n/a	n/a	50%	12%	17%
San Clemente	0421.14	Mod	5%	n/a	33%	25%	n/a	n/a	n/a	0%	7%	29%
San Clemente	0422.01	Middle	25%	n/a	33%	0%	n/a	n/a	n/a	27%	24%	14%
San Clemente	0422.03	Upper	16%	0%	18%	9%	0%	n/a	0%	24%	16%	12%
San Clemente	0422.05	Middle	9%	n/a	0%	33%	n/a	n/a	0%	17%	12%	23%
San Clemente	0422.06	Middle	10%	n/a	0%	0%	n/a	n/a	n/a	30%	13%	0%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
San Clemente	**Total**		**11%**	**0%**	**16%**	**18%**	**0%**	**100%**	**0%**	**16%**	**12%**	**16%**
Santa Ana	0740.03	Middle	40%	n/a	67%	10%	n/a	n/a	n/a	0%	36%	37%
Santa Ana	0740.04	Middle	25%	n/a	33%	17%	n/a	n/a	n/a	0%	22%	24%
Santa Ana	0740.05	Mod	14%	n/a	0%	7%	n/a	n/a	n/a	20%	9%	5%
Santa Ana	0740.06	Mod	13%	0%	8%	14%	n/a	n/a	n/a	67%	15%	10%
Santa Ana	0741.02	Mod	33%	n/a	20%	20%	n/a	n/a	n/a	100%	24%	20%
Santa Ana	0741.03	Middle	0%	n/a	16%	0%	n/a	n/a	n/a	0%	10%	12%
Santa Ana	0741.06	Mod	7%	n/a	13%	40%	n/a	n/a	n/a	0%	17%	26%
Santa Ana	0741.07	Middle	17%	0%	38%	14%	n/a	n/a	50%	33%	22%	24%
Santa Ana	0741.08	Mod	50%	n/a	31%	15%	n/a	n/a	n/a	0%	23%	23%
Santa Ana	0741.09	Mod	0%	n/a	20%	22%	n/a	n/a	n/a	50%	22%	21%
Santa Ana	0741.10	Middle	50%	n/a	0%	31%	n/a	n/a	0%	50%	23%	16%
Santa Ana	0741.11	Mod	0%	n/a	17%	0%	n/a	n/a	n/a	n/a	5%	7%
Santa Ana	0742.00	Mod	13%	n/a	27%	33%	n/a	n/a	n/a	33%	26%	28%
Santa Ana	0743.00	Mod	20%	n/a	28%	33%	n/a	n/a	n/a	0%	25%	29%
Santa Ana	0744.03	Low	n/a	n/a	17%	n/a	n/a	n/a	n/a	0%	14%	17%
Santa Ana	0744.05	Low	0%	n/a	0%	0%	n/a	n/a	n/a	0%	19%	0%
Santa Ana	0744.06	Mod	0%	n/a	33%	0%	n/a	n/a	n/a	100%	0%	29%
Santa Ana	0744.07	Low	45%	n/a	75%	0%	n/a	n/a	n/a	0%	44%	50%
Santa Ana	0745.01	Low	100%	n/a	0%	60%	n/a	n/a	n/a	0%	36%	33%
Santa Ana	0745.02	Mod	0%	n/a	40%	38%	n/a	n/a	n/a	0%	35%	39%
Santa Ana	0746.01	Mod	31%	n/a	11%	22%	n/a	n/a	n/a	17%	20%	15%
Santa Ana	0746.02	Mod	0%	n/a	4%	20%	n/a	n/a	n/a	14%	8%	7%
Santa Ana	0747.01	Mod	0%	n/a	32%	21%	0%	n/a	n/a	0%	25%	27%
Santa Ana	0747.02	Mod	0%	n/a	42%	0%	n/a	n/a	n/a	0%	32%	38%
Santa Ana	0748.01	Mod	0%	n/a	20%	20%	n/a	n/a	n/a	0%	15%	20%
Santa Ana	0748.02	Mod	0%	n/a	21%	25%	n/a	n/a	n/a	n/a	20%	22%
Santa Ana	0748.03	Mod	33%	n/a	27%	24%	n/a	n/a	100%	75%	31%	27%
Santa Ana	0748.05	Low	n/a	n/a	0%	0%	n/a	n/a	n/a	n/a	17%	0%
Santa Ana	0748.06	Low	0%	n/a	0%	20%	n/a	n/a	n/a	0%	0%	11%
Santa Ana	0749.01	Mod	33%	n/a	19%	33%	n/a	n/a	n/a	50%	26%	23%
Santa Ana	0749.02	Mod	0%	n/a	40%	25%	n/a	n/a	0%	0%	29%	33%
Santa Ana	0750.02	Mod	13%	100%	50%	33%	n/a	n/a	n/a	25%	30%	45%
Santa Ana	0750.03	Low	40%	n/a	75%	50%	n/a	n/a	n/a	0%	43%	67%
Santa Ana	0750.04	Low	25%	n/a	33%	n/a	n/a	n/a	n/a	0%	25%	33%
Santa Ana	0751.00	Low	0%	n/a	40%	0%	n/a	n/a	n/a	20%	18%	32%
Santa Ana	0752.01	Mod	0%	n/a	50%	41%	n/a	n/a	n/a	25%	40%	45%
Santa Ana	0752.02	Mod	0%	n/a	29%	20%	n/a	n/a	n/a	0%	23%	27%
Santa Ana	0753.01	Middle	18%	n/a	40%	0%	n/a	n/a	n/a	0%	17%	18%
Santa Ana	0753.02	Mod	13%	n/a	22%	0%	n/a	n/a	n/a	0%	16%	19%
Santa Ana	0753.03	Upper	3%	n/a	17%	67%	n/a	n/a	0%	13%	11%	25%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Santa Ana	0754.01	Middle	5%	0%	8%	33%	n/a	n/a	n/a	0%	9%	15%
Santa Ana	0754.03	Mod	17%	n/a	16%	38%	0%	n/a	n/a	50%	20%	21%
Santa Ana	0754.04	Mod	25%	n/a	0%	0%	n/a	n/a	n/a	25%	15%	0%
Santa Ana	0754.05	Middle	9%	n/a	14%	40%	n/a	n/a	n/a	0%	16%	21%
Santa Ana	0755.04	Middle	9%	n/a	17%	0%	n/a	n/a	n/a	17%	10%	8%
Santa Ana	0755.05	Mod	38%	0%	33%	0%	n/a	n/a	n/a	30%	33%	22%
Santa Ana	0755.15	Middle	20%	n/a	20%	16%	100%	n/a	n/a	18%	18%	18%
Santa Ana	0757.01	Middle	11%	0%	0%	0%	n/a	n/a	n/a	14%	9%	0%
Santa Ana	0758.06	Middle	4%	n/a	13%	38%	n/a	n/a	n/a	33%	13%	25%
Santa Ana	0759.02	Mod	9%	n/a	33%	50%	n/a	n/a	n/a	0%	14%	38%
Santa Ana	0760.00	Mod	25%	100%	0%	26%	0%	100%	n/a	25%	25%	24%
Santa Ana	0889.03	Mod	n/a	n/a	0%	37%	n/a	n/a	0%	n/a	32%	32%
Santa Ana	0890.01	Mod	n/a	n/a	0%	4%	n/a	n/a	n/a	0%	3%	4%
Santa Ana	0890.04	Mod	33%	n/a	14%	23%	n/a	n/a	n/a	0%	21%	21%
Santa Ana	0891.02	Mod	14%	n/a	16%	19%	n/a	n/a	n/a	0%	16%	18%
Santa Ana	0891.04	Low	0%	n/a	30%	11%	n/a	n/a	n/a	0%	18%	21%
Santa Ana	0891.05	Mod	n/a	n/a	33%	44%	n/a	n/a	n/a	0%	35%	39%
Santa Ana	0891.07	Middle	0%	n/a	18%	23%	n/a	n/a	n/a	50%	23%	22%
Santa Ana	0992.02	Mod	0%	n/a	0%	15%	0%	n/a	n/a	25%	13%	13%
Santa Ana	0992.03	Middle	29%	n/a	0%	37%	n/a	n/a	n/a	n/a	33%	34%
Santa Ana	0992.47	Low	100%	n/a	0%	36%	n/a	n/a	n/a	n/a	31%	27%
Santa Ana	0992.48	Mod	0%	n/a	20%	20%	100%	n/a	n/a	n/a	25%	27%
Santa Ana	0992.49	Low	n/a	n/a	50%	11%	n/a	n/a	n/a	n/a	18%	18%
Santa Ana	**Total**		**16%**	**29%**	**23%**	**22%**	**33%**	**100%**	**25%**	**19%**	**20%**	**23%**
Tustin	0219.14	Upper	22%	n/a	0%	10%	n/a	0%	n/a	0%	12%	6%
Tustin	0524.19	Upper	14%	n/a	0%	17%	n/a	n/a	n/a	29%	16%	13%
Tustin	0525.02	Middle	16%	n/a	0%	20%	n/a	n/a	n/a	14%	16%	15%
Tustin	0525.24	Upper	0%	n/a	0%	8%	n/a	n/a	0%	14%	6%	7%
Tustin	0744.06	Mod	0%	n/a	33%	0%	n/a	n/a	n/a	100%	30%	29%
Tustin	0744.07	Low	45%	n/a	75%	0%	n/a	n/a	n/a	0%	44%	50%
Tustin	0744.08	Mod	18%	0%	0%	20%	n/a	n/a	n/a	33%	17%	11%
Tustin	0754.03	Mod	17%	n/a	16%	38%	0%	n/a	n/a	50%	20%	21%
Tustin	0755.04	Middle	9%	n/a	17%	0%	n/a	n/a	n/a	17%	10%	8%
Tustin	0755.05	Mod	38%	0%	33%	0%	n/a	n/a	n/a	30%	33%	22%
Tustin	0755.06	Middle	9%	0%	14%	22%	0%	n/a	n/a	50%	15%	17%
Tustin	0755.07	Mod	20%	n/a	50%	0%	0%	n/a	n/a	n/a	20%	20%
Tustin	0755.12	Mod	0%	n/a	0%	0%	n/a	n/a	n/a	100%	13%	0%
Tustin	0755.13	Mod	11%	n/a	40%	11%	n/a	n/a	n/a	40%	24%	26%
Tustin	0755.14	Mod	0%	n/a	0%	0%	n/a	n/a	0%	50%	10%	0%
Tustin	0755.15	Middle	20%	n/a	20%	16%	100%	n/a	n/a	18%	18%	18%
Tustin	0756.03	Upper	0%	n/a	n/a	9%	0%	n/a	n/a	0%	2%	8%

Appendix C-2

Percent of Denied Purchase Loans - By Census Tracts - Applicant Race

2013

City	Number	Tract Income	Applicant Race									Min. %
			White	Black	Hispanic	Asian	Haw.	Nat. Am.	Multi	Unk/NA	Total	
Tustin	0756.04	Upper	17%	n/a	0%	12%	n/a	0%	100%	31%	18%	14%
Tustin	0756.05	Upper	11%	n/a	56%	14%	0%	n/a	n/a	43%	18%	29%
Tustin	0756.06	Upper	16%	0%	0%	20%	n/a	n/a	n/a	25%	17%	16%
Tustin	0756.07	Upper	10%	n/a	0%	8%	n/a	n/a	0%	22%	10%	8%
Tustin	0757.01	Middle	11%	0%	0%	0%	n/a	n/a	n/a	14%	9%	0%
Tustin	0757.02	Middle	12%	n/a	0%	29%	n/a	n/a	n/a	0%	14%	25%
Tustin	**Total**		**15%**	**0%**	**20%**	**13%**	**14%**	**0%**	**25%**	**24%**	**16%**	**15%**
OC County			**12%**	**18%**	**19%**	**16%**	**18%**	**17%**	**18%**	**16%**	**15%**	**17%**

Source: www.lendingpatterns.com, October 2015

Tabulations: GRC Associates, Inc., October 2015

1 - Includes conventional and govt-assisted (FHA, FSA/RHS and VA) home purchase applications.

2 - Table includes all applications that went through the complete underwriting process,
and excludes applications withdrawn or files closed for incompleteness.

Appendix D: HUD Worksheet

Survey of Zoning and Planning Codes, Policies and Practices That May Pose an Impediment to Fair Housing Choice HUD Worksheet

Name of Jurisdiction: City of Mission Viejo

Completing Department: Community Development

Completed By: Larry Longenecker

Date Completed: 10-2-15

INTRODUCTION

As part of the preparation of an Analysis of Impediments to Fair Housing Choice, which is required for the receipt of certain federal funds, this survey seeks answers to questions regarding local governmental codes or policies and practices that may result in the creation or perpetuation of one or more impediments to fair housing choice. It has a particular focus on land use and zoning regulations, practices and procedures that can act as barriers to the situating, development, or use of housing for individuals with disabilities. However, it also touches on areas that may affect fair housing choice for families with children or otherwise serve as impediments to full fair housing choice.

The survey will help with the analysis of the codes and other documents related to land use and zoning decision-making provided by the jurisdiction. Additional information may be sought through interviews with appropriate staff. In identifying impediments to fair housing choice, the survey looks to distinguish between regulatory impediments based on specific code provisions and practice impediments, which arise from practices or implementing policies used by the jurisdiction.

QUESTIONS

1. **Does the Code definition of "family" have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement?**
   Yes ____ No__x__

a. Background

Local zoning and land use laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities violate the Fair Housing Act. For example, suppose a city's zoning ordinance defines "family" to include up to six unrelated persons living together as a household unit, and gives such a group of unrelated persons the right to live in any zoning district without special permission. If that ordinance also disallows a group home for six or fewer people with disabilities in a certain district or requires this home to seek a use permit, such requirements would conflict with the Fair Housing Act. The ordinance treats persons with disabilities worse than persons without disabilities.

In 1980, the California Supreme Court in City of Santa Barbara v. Adamson struck down the City's ordinance that permitted any number of *related* people to live in a house in a R1 zone, but limited the number of *unrelated* people allowed to do so to five. Under the Santa Barbara ordinance, a group home for individuals with disabilities that functions like a family could be excluded from the R1 zone solely because the residents are *unrelated* by blood, marriage or adoption.

Both State and Federal fair housing laws prohibit definitions of family that either *intentionally* discriminate against people with disabilities or *have the effect* of excluding such individuals from housing. Fair housing laws, for instance, prohibit definitions of family that limit the development and siting of group homes for individuals with disabilities (but not families similarly sized and situated). Such definitions are prohibited because they could have the effective of denying housing opportunities to those who, because of their disability, live in a group setting. The failure to modify the definition of family or make an exception for group homes for people with disabilities may also constitute a refusal to make a reasonable accommodation under the Fair Housing Act.

For example, the following definition of family would be inconsistent with fair housing laws:

> "Family" means a householder and one or more other people living in the same household who are *related* to the householder by birth, marriage or adoption.

A definition of family should look to whether the household functions as a cohesive unit instead of distinguishing between related and unrelated persons.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

Development Code Section [9.01.050 (a,75)] definition of "family"

2. Does the Code or any policy document define "disability", if at all, at least as broadly as the Fair Housing Act? Yes _____ No ___x___

a. Background

The Fair Housing Act prohibits discrimination on the basis of handicap or disability, and defines persons with disabilities as: "individuals with physical or mental impairments that substantially limit one or more major life activities; has a record of such impairment; or is regarded as having such impairment."

The term physical or mental impairments may include conditions such as blindness, hearing impairment, mobility impairment, HIV infections, AIDS, AIDS Related Complex, mental retardation, chronic alcoholism, drug addiction, chronic fatigue, learning disability, head injury, and mental illness. The term major life activities may include walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

The City's Housing Element, Section 2.5(1), adopted March 4, 2013, defines "developmental disability", as defined by Federal law, to include mental or physical impairments manifested by age 22, with functional limitations in three of more major life activities (not one or more).

3. Are the personal characteristics of the (disabled) residents considered? Yes _____ No __x__

a. Background

Under the Fair Housing Act, cities may have reasonable restrictions on the maximum number of occupants permitted to occupy a dwelling; however, the restrictions cannot be based on the *characteristics* of the occupants; the restrictions must apply to all citizens, and are based upon health and safety standards. Similarly, a conditional use permit or variance requirement triggered by the number of people with certain *characteristics (*such as a disability) who will be living in a particular dwelling, is prohibited. Because licensed residential care facilities serve people with disabilities, imposing a variance requirement on family-like facilities of a certain size and not similarly sized housing for people without disabilities violates fair housing laws.

According to the DOJ and HUD, "group home" does not have a specific legal meaning. In the DOJ/HUD Joint Statement* -

> "…the term *group home* refers to housing occupied by groups of unrelated individuals with disabilities. Sometimes, but not always, housing is provided by organizations that also offer services for individuals with disabilities living in the group home. Sometimes it is this group home operator, rather than the individuals who live in the home, that interacts with local government in seeking permits and making requests for reasonable accommodations on behalf of those individuals."
>
> "The term *group home* is also sometimes applied to any group of unrelated persons who live together in a dwelling – such as a group of students who voluntarily agree to share the rent on a house. The Act does not generally affect the ability of local governments to regulate housing of this kind, as long as they do not discriminate against residents on the basis of race, color, national origin, religion, sex, handicap (disability) or familial status (families with minor children)."
>
> "Local zoning and land use laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities violate the Fair Housing Act."
>
> [*Joint Statement of DOJ and HUD, *Group Homes, Local Land Use, and the Fair Housing Act,* August 18, 1999, page 3]

b. <u>Explanation of Answer Given Above</u>

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

> "Group homes" are covered in the City's definition of residential care facilities [Section 9.01.050(a,129)]. The City's Housing Element [Section 4.1(c)] indicates that residential care facilities must be permitted by right in all residential zones, for 6 or fewer persons, with a conditional use permit required for 7 or more persons.

4. Does the zoning ordinance restrict housing opportunities for individuals with disabilities and mischaracterize such housing as "boarding or rooming house" or "hotel"?
Yes _____ No ___x___

a. <u>Background</u>

Housing for disabled persons in some communities is limited to certain residential zones. Often, housing for disabled persons is included in how cities define a boarding house or hotel.

Under California state law, licensed facilities serving six persons or fewer receive special land use protection. California requires that many types of licensed facilities serving six persons or fewer be

treated for zoning purposes like single-family homes. Except in extraordinary cases in which even single-family home requires a conditional use permit, these laws bar conditional use permits for facilities that serve six or fewer persons. The land use protection applies to –

- Intermediate care facilities for individuals who have developmental disabilities
- Residential facilities for persons with disabilities and for abused children
- Residential care facility for the elderly
- Alcoholism and drug treatment facilities
- Residential facilities for persons with chronic life threatening illness

For example, Health and Safety Code Section 11834.23 (Zoning Laws) states:

> "Whether or not unrelated persons are living together, an alcoholism or drug abuse recovery or treatment facility, which serves six or fewer persons shall be considered a residential use of property for the purposes of this article. In addition, the residents and operators of such a facility shall be considered a family for the purposes of any law or zoning ordinance which relates to the residential use of property…"

Furthermore:

> "No conditional use permit, zoning variance, or other zoning clearance shall be required of an alcoholism or drug abuse recovery or treatment facility which serves six or fewer persons that is not required of a *single – family residence in the same zone."*

Essentially, identical provisions are stated with regard to a residential facility, which serves six or fewer persons. A residential facility

> "…means any family home, group care facility, or similar facility for 24-hour nonmedical care of persons in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of the individual."

Health and Safety Code Section 1566.3 states:

> "No conditional use permit, zoning variance, or other zoning clearance shall be required of a residential facility which serves six or fewer persons which is not required of a family dwelling of the same type in the same zone."

Further:

> "'family dwelling' includes, but is not limited to, single-family dwellings, units in multi-family dwellings, including units in duplexes and units in apartment dwellings, mobile homes, including mobile homes located in mobile home parks, units in cooperatives, units in condominiums, units in townhouses, and units in planned developments."

State law requires that residential care facilities not be defined within the meaning of boarding house, rooming house, institution or home for the care of minors, the aged, or the mentally infirm, foster care home, guest home, rest home, sanitarium, mental hygiene home, or other similar term *which implies that a residential facility is a business run for profit.*

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

> Residential care facilities are allowed by right (see previous response) and housing for individuals with disabilities is not limited to certain zones or included in other definitions such as boarding house or hotel.

5. Does the zoning ordinance deny housing opportunities for disabled individuals with on site housing supporting services ? Yes _____ No __x___

a. Background

Housing for disabled persons often must incorporate on-site supportive services. Zoning provisions that limit on-site supportive services will, in effect curtail the development of adequate housing for the disabled. As the joint statement by DOJ and HUD indicates:

> "Sometimes, but not always, housing is provided by organizations that also offer services for Individuals with disabilities living in the group home."

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

> No such limitation is in the City Codes or policy documents.

6. Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled? Yes _____ No __x___

a. Background

The joint statement by DOJ and HUD describes this issue as follows:

> "A local government may generally restrict the ability of groups of unrelated persons to live together as long as the restrictions are imposed on all such groups. Thus, in the case where a family is defined to include up to six unrelated people, an ordinance would not, on its face, violate the Act if a group home of seven unrelated people with disabilities was not allowed to

locate in single-family zoned neighborhood, because a group of seven unrelated people without disabilities would also not be allowed."

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

See Development Code definition of "family Section 9.01.050(a,75)

7. Does the jurisdiction policy not allow disabled persons to make reasonable modifications or provide reasonable accommodation for disabled people who live in municipal-supplied or managed residential housing? Yes _____ No__x___

a. Background

A joint statement by DOJ and HUD explains this issue as follows:

"As a general rule, the Fair Housing Act makes it unlawful to refuse to make 'reasonable accommodations' (modifications or exceptions) to rules, policies, practices, or services, when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use or enjoy a dwelling."

"Even though a zoning ordinance imposes on group homes the same restrictions it imposes on other groups of unrelated people, a local government may be required, in individual cases and when requested to do so, to grant a reasonable accommodation to a group home for persons with disabilities. For example, it may be a reasonable accommodation to waive a setback required so that a paved path of travel can be provided to residents who have mobility impairments. A similar waiver might not be required for a different type of group home where residents do not have difficulty negotiating steps and do not need a setback in order to have an equal opportunity to use and enjoy a dwelling."

"Where a local zoning scheme specifies procedures for seeking a departure from the general rule, courts have decided, and the Department of Justice and HUD agree, that these procedures must ordinarily be followed. If no procedure is specified, persons with disabilities may, nevertheless, request a reasonable accommodation in some other way, and a local government is obligated to grant it if it meets the criteria discussed above. A local government's failure to respond to a request for reasonable accommodation or an inordinate delay in responding could also violate the Act."

"Local governments are encouraged to provide mechanisms for requesting reasonable accommodations that operate promptly and efficiently, without imposing significant costs or

delays. The local government should also make efforts to insure that the availability of such mechanisms is well known within the community."*

[*Joint Statement of DOJ and HUD, *Group Homes, Local Land Use, and the Fair Housing Act,* August 18, 1999, pages 3 and 4]

The Fair Housing Act requires *housing providers* to make reasonable accommodations for persons with disabilities. A reasonable accommodation is a change in rules, policies, practices, or services so that a person with a disability will have an equal opportunity to use and enjoy a dwelling unit or common space. A housing provider should do everything s/he can to assist, but s/he is not required to make changes that would fundamentally alter the program or create an undue financial and administrative burden. Reasonable accommodations may be necessary at all stages of the housing process, including application, tenancy, or to prevent eviction.

Example: *A housing provider would make a reasonable accommodation for a tenant with mobility impairment by fulfilling the tenant's request for a reserved parking space in front of the entrance to their unit, even though all parking is unreserved.*

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

Development Code Chapter 9.60 provides for reasonable accommodations, specifically to comply with the Federal Fair Housing Act and California Fair Employment & Housing Act.

8. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land use rules for disabled applicants and is the hearing only for disabled applicants rather than for all applicants? Yes _____ No __x___

a. Background

Persons with disabilities cannot be treated differently from non-disabled persons in the application, interpretation and enforcement of a community's land use and zoning policies.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

In accordance with Development Code Section 9.60.040, notice of a request for reasonable accommodations is provided to owners of property immediately adjacent to the subject property. A hearing is conducted if requested by any person.

9. Does the zoning ordinance address mixed uses? Yes _____ No __x____
How are the residential land uses discussed? What standards apply?

a. Background

Housing for disabled persons in a mixed-use development that includes commercial and residential land uses in a multi-story building could be a challenge. In such a development, it is especially important to correctly interpret the Title 24 accessibility requirements.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

No mixed use zones in the City.

10. Does the zoning ordinance describe any areas in this jurisdiction as exclusive?

Yes _____ No __x___

Are there exclusions or discussions of limiting housing to any of the following groups?

Yes ____ No __x_ If yes, check any of the following that apply:

___Race ___Color ___Sex ___Religion ___Age ___Disability

___Marital or Familial Status ___Creed or National Origin

a. Background

Fair housing means the ability of persons of similar income levels to have available to them the same housing choices. The City's land use and zoning policies cannot exclude persons from living in the neighborhoods in which they want to reside.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

No such limitations are included in the City Codes or policy documents.

11. Are there any restrictions for Senior Housing in the zoning ordinance? Do the restrictions comply with Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older or at least one person 55 years of age or older and has significant facilities or services to meet the physical or social needs of older people?) Yes__x__No _____

a. Background

According to HUD, the Fair Housing Act protests all citizens from discrimination on the basis of familial status – that is, families with children under the age of 18 living with parents or legal guardians; pregnant women; and people trying to secure custody of children under 18. However, housing that meets the Fair Housing Act's definition of 'housing for older persons' is *exempt* from the law's familial status requirements, provided that:

- HUD has determined that the dwelling is specifically designed for and occupied by elderly persons under a Federal, State or local government program, or
- It is occupied by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80% of the occupied units, and adheres to a policy that demonstrates intent to house persons who are 55 or older.

The Housing for Older Persons Act of 1995 eliminated the requirements for "significant services and facilities" (mentioned in Q. 11) within designated senior housing units or areas.

In California, Section 51 of the Unruh Civil Rights Act, also defines seniors as meaning persons 62 years of age or older, or 55 years of age and older in a senior citizen housing development. A senior citizen housing development is one for senior citizens that has at least 35 dwelling units.

b. Explanation of Answer Given Above In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

Per Development Code Section 9.11.020(b,7), the City has established Senior Housing (SH) Overlay Zone to regulate specialized housing designed to meet the physical and social needs of senior citizens in the commercial community center, commercial highway, and office/professional zones. A conditional use permit is required for any housing for senior citizens that is located within the Senior Housing (SH) Overlay Zone. Subject to obtaining a conditional use permit as provided by the zoning regulations of the city, specialized housing for senior citizens shall be subject to the following additional standards:

- The housing facility shall be specially designed to meet the physical and social needs of senior citizens. The housing facility shall preserve and restrict occupancy to senior citizen tenants to the degree allowable by law.
- The housing facility shall provide a useable multipurpose room where communal activities including dining may be hosted.

- The housing facility shall provide emergency alert systems in each unit to notify the on-site staff that assistance is needed.
- A housing facility staff member shall be on-site 24 hours a day every day to assist tenant in emergencies.
- The facility management shall coordinate social services for tenants which includes meals and transportation. The service may be provided by the facility management or an outside agency.
- The on-site facility management shall maintain current records pertaining to the tenant's doctor and emergency contacts.
- Occupancy of a unit shall be limited to a single person at least 62 years of age or a couple of which one member is at least 62 years of age.

12. Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities? Yes_x___ No _____

a. Background

Fair housing laws that require accessible units apply to "covered multifamily dwellings" constructed for first occupancy after March 13, 1991. First occupancy is defined as a "building that has never been used for any purpose".

There is no timetable for the production of accessible housing; as such housing is constructed when residential projects are built. The Fair Housing Act does not require any renovations to existing buildings. Its design requirements apply to new construction only.

Both privately owned and publicly assisted housing – including rental and for sale units – must meet the accessibility requirements when they are located in 1) buildings of four or more dwellings if such buildings have one or more elevators, and 2) all ground floor dwellings in other buildings containing four or more units.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

Adopted as Development Code Chapter 8.02: "Building and Housing Codes", most recently adopting the 2013 editions of the CA Building, Residential, Plumbing, Electrical, Mechanical, Green Building, and Historical Building Codes, with disabled access provisions consistent the Americans with Disabilities Act.

13. Does the ordinance establish occupancy standards or maximum occupancy limits?

Yes____ No___x__

Do the restrictions exceed those imposed by state law? Yes ___ No __x__

a. Background

Occupancy standards sometimes can impede the development of housing for disabled persons. Some zoning regulations limit occupancy to five related persons occupying a single family home. Such regulations can prevent the development of housing for disabled persons.

The Fair Housing Act provides that nothing in the Act "limits the applicability of any reasonable local, State or Federal restrictions regarding the maximum number of occupants permitted to occupy a dwelling".

HUD implements section 589 of the QHWRA by adopting as its policy on occupancy standards for purposes of enforcement actions under the Fair Housing Act, the standards provided in the Memorandum of General Counsel Frank Keating to Regional Counsel dated March 20, 1991. Specifically, HUD believes that an occupancy policy of two persons in a bedroom, as a general rule, is reasonable under the Fair Housing Act. However, HUD has pointed out, that there is nothing in the legislative history which indicates any intent on the part of Congress to provide for the development of a national occupancy code.

Thus, HUD believes that in appropriate circumstances, owners and managers may develop and implement reasonable occupancy requirements based on factors such as the number and size of sleeping areas or bedrooms and the overall size of the dwelling unit.

In this regard, it must be noted, in connection with a complaint alleging discrimination on the basis of familial status, HUD will carefully examine any such nongovernmental restriction to determine whether it operates unreasonably to limit or exclude families with children.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

See response to Question No. 1, definition of "family".

14. Does the zoning ordinance include a discussion of fair housing? Yes __x__ No _____

If yes, how does the jurisdiction propose to further fair housing?

By administering the Zoning Code.

a. Background

Affirmatively furthering fair housing is an important responsibility of local government. Although a city may have numerous plans, policies, and standards, fair housing is rarely discussed in a zoning ordinance. Other documents of a city may further fair housing.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

Fair housing is discussed/referenced related to: 1) reasonable accommodation, and 2) accessible parking requirements. (Sections 9.60.010-030 and 9.25.025, respectively)

15. Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking?

a. Background

Federal and State laws require handicap parking. To further fair housing for disabled persons, a city's requirements should equal or exceed the minimum standards of Federal and State laws.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

Section 9.25.025 of the Development Code requires accessible parking for residential uses "be provided according to the U.S. Fair Housing Amendment Act of 1988 and California Disabled Access Regulations".

16. Does the zoning code distinguish senior citizen housing from other single- and multifamily residential uses by the application or a conditional use permit (CUP)? Yes _x___ No ____

a. Background

Senior housing is an important component of the community's housing stock. As a population ages, seniors need a variety of housing opportunities.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

Development Code Section 9.10.015(a,6) requires a conditional use permit for senior housing projects.

17. How are "special group residential housing units" defined in the jurisdiction's zoning code?

a. Background

The term group home does not have a specific legal meaning. According to the DOJ/HUD Joint Statement the term 'group home' is sometimes applied to any group of unrelated persons who live together in a dwelling – such as a group of students who voluntarily agree to share the rent on a house. The Fair Housing Act does not generally affect the ability of local governments to regulate housing of this kind, as long as they do not discriminate against residents on the basis of race, color, national origin, religion, sex, handicap (disability) or familial status (families with minor children).

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

No applicable definition/distinction other than "Residential Care Facility" (see response to Question #4).

18. Do the jurisdiction's planning and building codes presently make a specific reference to the accessibility requirements contained in the 1988 amendments to the Fair Housing Act?

Yes __x___ No _____

Is there any provision for monitoring compliance? Yes __x__ No ____

a. Background

The Fair Housing Act establishes accessibility requirements for new housing. Title 24 of the California Code of Regulations, known as the California Building Standards Code or just 'Title 24', contains the regulations that govern the construction of buildings in California. Chapter 11A contains the regulations governing housing accessibility. The City enforces the Title 24 accessibility regulations.

b. Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at your answer:

Compliance with Title 24, including Chapter 11A, is monitored through the Building Permit Plan Check process, and Building Permit Inspection process.