APPENDIX B. AFFIRMATIVELY FURTHERING FAIR HOUSING ANALYSIS

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APPENDIX B. AFFIRMATIVELY FURTHERING FAIR HOUSING ANALYSIS

Assembly Bill 686 (AB 686), passed in 2018, requires cities and counties to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing, and to not take any action that is materially inconsistent with this obligation. AB 686 defined "affirmatively further fair housing" to mean "taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity" for persons of color, persons with disabilities, and other protected classes.

AB 686 requires that all housing elements prepared on or after January 1, 2021, include a program with the following:

- An assessment of fair housing within the jurisdiction that includes the following components: a summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities; an assessment of contributing factors; and an identification of fair housing goals and actions.
- Affirmatively further fair housing as part of achieving the goals and objectives.
- The Sites Inventory in all housing elements incorporate affirmatively furthering fair housing.

The City of Irvine (City or Irvine) has completed the following outreach and analysis to inform the Housing Element and all housing goals, policies, and programs to meet State law housing requirements. The City's objective is to promote and affirmatively further fair housing opportunities throughout the community for all people regardless of age, race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, and genetic information.

It should be noted that some of the statistics referenced in this appendix may differ from those in Chapter 2, Community Profile and Needs, of the Housing Element. The data in the Community Profile was largely obtained from the Southern California Association of Governments (SCAG) reporting for each community that has been pre-certified by the California Department of Housing and Community Development (HCD). However, additional data research and analysis beyond these parameters of the pre-certified data was required for this appendix. The data utilized in several potions of this appendix are more current than that in the pre-certified data.

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Outreach

As discussed in Appendix A, Public Engagement, the City held two general community workshops, one focused community workshop on future housing sites targeting property owners and all interested parties, several stakeholder meetings with affordable housing developers (see Appendix A for a summary) and conducted a statistically valid public survey and supplemental focus groups in addition to the standard public hearing process. Outreach efforts are summarized below and in detail in Appendix A.

- A public survey was conducted by True North Research with findings published in August 2020.
- Four focus group meetings were held in January 2021 to augment the survey results.
- City staff mailed 2,436 letters to property owners in the IBC, the Spectrum and other areas regarding the Housing Element Update with notice of a virtual public meeting for property owners as well as instructions on how to notify the City if property owners are interested in potentially redeveloping existing non-residential properties to residential units.
- The community workshops were noticed through the City's HEU project website (www.cityofirvine.org/HEUpdate), social media announcements, fliers, and the City's email notification system. The workshops were held virtually via Zoom on weekdays at various times to facilitate participation.
- City staff also reached out to a number of affordable housing developers that are active in Irvine and the surrounding area to obtain input on needs and opportunities. Emails were sent to nine affordable housing developers to set up meetings on the Housing Element Update.
- Finally, City staff had multiple coordination meetings with the largest landowners in the City, the Irvine Company and FivePoint (together owning nearly 60% of the land in the City) to discuss housing opportunities, including viable densities, redevelopment opportunities, specific sites for the Site Inventory and income levels for new housing units.

As documented in Appendix A, significant outreach was conducted by the City for over a year before the Housing Element Update was drafted and released. The City made an intentional effort to reach non-English speaking households by providing translation for the following in seven languages (Traditional Chinese, Simplified Chinese, Korean, Vietnamese, Japanese, Spanish, Farsi, and Arabic).

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Assessment of Fair Housing Issues

California Government Code, Section 65583(c)(10)(A)(ii), requires all counties in California to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs including displacement risk.

To assist in this analysis of integration and segregation, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task Force to "provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD)." The Task Force has created Opportunity Maps to identify resource levels across the State "to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9 percent Low Income Housing Tax Credits (LIHTCs)." The maps are created using composite scores of three different "domains," each consisting of a set of indicators. The maps include a measure or "filter" to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- **Poverty:** Tracts with at least 30% of population under Federal poverty line.
- **Racial Segregation:** Tracts with location quotient higher than 1.25 for African Americans, Hispanics, Asians, or all people of color in comparison to Orange County (County) high segregation and poverty census tracts are, therefore, areas of over-concentrated low-income and minority households with limited access to resources and pathways to success.

California Tax Credit Allocation Committee/California Department of Housing and Community Development Opportunity Areas Map

The 2021 TCAC/HCD Opportunity Area map uses composite index scores of three different domains (economic, environmental, and education) to categorize tracts as low, moderate or high resource. Categorization is based on percentile rankings for census tracts within the Orange County region and higher composite scores mean higher resources. Within Orange County, most of the high and highest resource areas are located along the coast, in South County, Irvine, and the County's eastern areas. The City ranges almost entirely between moderate resource and highest resource areas, with pockets of low resource areas. The 2021 TCAC/HCD Opportunity Area Map identifies four of the City's census tracts as low resource, nine as moderate resource, one as moderate resource (rapidly changing), 11 as high resource, and 12 as highest resource. (Note: One census tract within the City has missing/insufficient data.) The four low resource census tracts generally correspond to the Irvine Business Complex Area. Table B-1, Opportunity Area Map Scores and Categorization, shows the scores by domain for

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each census tract. Figure B-1, TCAC/HCD Opportunity Area Map, illustrates the categorization of resource areas in and around the City.

Table B-1. Opportunity Area Map Scores and Categorization

CENSUS TRACT	ECONOMIC DOMAIN SCORE	ENVIRONMENTAL DOMAIN SCORE	EDUCATION DOMAIN SCORE	COMPOSITE INDEX SCORE	FINAL CATEGORY
06059062628	0.894	0.92	0.768	0.588	Highest Resource
06059052511	0.917	0.737	0.882	0.613	Highest Resource
06059052408	0.679	0.007	0.53	-0.336	Low Resource
06059062612	0.787	0.456	0.811	0.414	High Resource
06059062611	0.094	0.366	0.579	-0.12	Moderate Resource
06059052522	0.872	0.645	0.759	0.474	Highest Resource
06059052421	0.941	0.042	0.948	0.381	High Resource
06059052417	0.516	0.04	0.893	0.12	Moderate Resource
06059052418	0.861	0.012	0.88	0.129	Moderate Resource
06059052420	0.939	0.296	0.929	0.548	Highest Resource
06059052505	0.352	0.237	0.747	0.118	Moderate Resource
06059052515	0.745	0.444	0.737	0.361	High Resource
06059052513	0.69	0.733	0.901	0.51	Highest Resource
06059052506	0.766	0.352	0.82	0.379	High Resource
06059062614	0.085	0.49	0.846	0.084	Moderate Resource
06059052410	0.184	0.014	0.357	-0.649	Low Resource
06059062621	0.74	0.516	0.38	0.029	Moderate Resource (Rapidly Changing)
06059052517	0.643	0.045	0.801	0.127	Moderate Resource
06059052514	0.815	0.53	0.825	0.461	Highest Resource
06059075515	0.452	0.005	0.236	-0.839	Low Resource
06059052528	0.685	0.809	0.815	0.478	Highest Resource
06059052525	0.889	0.321	0.804	0.418	High Resource
06059052519	0.763	0.674	0.653	0.354	High Resource
06059052518	0.575	0.064	0.648	0.031	Moderate Resource
06059052520	0.744	0.797	0.763	0.467	Highest Resource
06059062610	0.757	0.031	0.411	-0.214	Moderate Resource
06059062604	0.979	0.437	0.955	0.736	Highest Resource
06059052521	0.704	0.541	0.759	0.388	High Resource
06059052426	0.674	0.21	0.873	0.322	High Resource
06059052527	0.771	0.345	0.735	0.334	High Resource
06059052526	0.627	0.518	0.747	0.343	High Resource
06059052523	0.828	0.412	0.579	0.275	High Resource
06059062627	0.003	0.629	0.887	-0.018	Moderate Resource
06059062626	0	0.702	0.645	-0.303	Low Resource
06059062631	0.984	0.967	0.957	0.922	Highest Resource
06059052404	#N/A	#N/A	#N/A	#N/A	Missing/Insufficient Data
06059062630	0.858	0.683	0.903	0.564	Highest Resource
06059062629	0.903	0.955	0.957	0.744	Highest Resource

TCAC and HCD identify between one and five indicators for each domain. The indicators are:

- Poverty.
- Adult education.
- Employment.
- Job proximity.

- Median home value.
- Exposures and environmental effects, as measured for CalEnviroScreen 3.0.
- Math proficiency.
- Reading proficiency.
- High School graduation rates.
- Student poverty rate.

Because the indicator scores are measured differently from each other (e.g., percent versus dollar amount), TCAC/HCD calculates a unit-less "z-score" for each indicator. The z-scores are averaged by domain, and the domain scores are averaged to create an index score. Higher index scores indicate higher levels of access to opportunity. As described in this appendix, the City analyzed several additional factors to assess patterns that may further fair housing issues and to identify actions to combat these barriers to accessing opportunities.

The City has conducted the following analysis of available data to assess local access to opportunities and indicators of fair housing issues in addition to the designations provided by the 2021 TCAC/HCD Opportunity Area Map. Data for disability was available at the City and regional (county subdivision) levels, while data for poverty rates, opportunity areas, housing cost burden, jobs proximity, and diversity were available at the block group level, and data for familial status was available at the zip code level. The City used the most localized levels of data available for this analysis and the 2014–2018 American Community Survey (ACS) 5-Year Estimates for consistency with the demographic data prepared in the Southern California Association of Governments pre-certified data packet and incorporated into the Housing Element.

Patterns of Integration and Segregation

Concentrations of Minority Population

The 2021 TCAC/HCD Opportunity Areas map combines both poverty and patterns of minority concentrations. Those census tracts that have both a poverty rate of over 30% and are designated as racially segregated are filtered into the "High Segregation & Poverty" category. The term "concentration" is assumed to mean a census tract block group with a proportion of a particular race/ethnic group greater than that of the countywide average for that group.

Figure B-2 through B-5 illustrate the concentrations of minorities in general, as well as African American, Hispanic, and Asian populations. As shown, a total of 50 census block groups in the City exceed the County minority concentration average of approximately 38%, mostly located near John Wayne Airport, the University of California, Irvine, southeast of the 405 Freeway, and the Orange County Great Park.

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In block groups throughout most of the City north of Jeffrey Road and near the Irvine Spectrum Center, 32 of the 121 census block groups in the City exceed the County Asian concentration average of approximately 20%. There are 68 census block groups that exceed the County Hispanic concentration average of 34%, where the majority of these block groups are near the Irvine Business Complex and near Irvine Station along the Interstate 5 and Toll Road 133. A total of 54 of the 121 census block groups in the City exceed the County African American concentration average of 2%, the majority of these are spread throughout the City and near the Irvine Spectrum Center.

Areas with Limited English Proficiency

According to the 2014-2018 5-year ACS estimates, approximately 37.9% of Irvine residents were foreign born. This data is important so the City can ensure residents are treated fairly in housing regardless of national origin. The foreign-born portion of the population may be more susceptible to discrimination due to limited English proficiency.

The U.S. Census Bureau defines a "linguistically isolated household" as a household in which all members age 14 years and older speak a non-English language and also speak English less than "very well." The ACS provides information on households with populations five years and over who speak English "less than very well." In Irvine, the percentage of linguistically isolated population is an estimated 17.1% of the population. The most commonly spoken language for those in Irvine with Limited English Proficiency (LEP) is Chinese – distinct from the most common language spoken by those with LEP in the County (Spanish).

Language barriers may not only prevent residents from accessing services, information, and housing but may also affect educational attainment and employment. On August 11, 2000, the President signed Executive Order 13166 (Improving Access to Services by Persons with Limited English Proficiency). The Executive Order requires Federal agencies to assess and address the needs of otherwise eligible people seeking access to Federally conducted programs and activities and who, due to limited English proficiency, cannot fully and equally participate in or benefit from those programs and activities. This requirement also applies to Federal fund grantees and sub recipients. Therefore, the City is required to comply with this regulation.

Concentration of Poverty

Figure B-6, Poverty Concentration Map, identifies concentrations of poverty in Irvine by census block group per the 2014–2018 ACS 5-Year Estimates. A concentrated area of poverty is defined by the U.S. Department of Housing and Urban Development (HUD) as a census tract where the percentage of individuals living in households with incomes below the poverty rate is more than the lesser of 40% or three times the average poverty rate for the metropolitan area. The City is located in the Los Angeles-Long Beach-Anaheim metropolitan area, where the average poverty rate (according to 2014–2018 ACS 5-Year Estimates) is approximately 15%.

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As shown on Figure B-6, concentrations of poverty are most prominent around the University of California, Irvine. Where as much as 68.7% of the population have household incomes below the poverty level. In Irvine, only one of the minority concentration areas identified on Figure B-2, the area near the University of California, Irvine, is also an area with a concentration of poverty; this may be attributed to the large number of full-time undergraduate and graduate students with lower incomes who reside in the area. The poverty rate is highest in Census Tract 626.26, Block Group 2, where 84.4% of the households have an income below the poverty level. Eight of the City's 121 block groups (7%) have a concentration of poverty, compared to 34 of the County's 1,823 census block groups (2%).

The Senate Bill 2 Compliance Sites Inventory (Appendix C) identifies 3% of all units (at all income levels) and 8% of lower-income units on sites in areas with a concentration of poverty. These rates are quite low due to the City's overall high levels of income.

Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

In an effort to identify R/ECAPs, HUD has identified census tracts with the majority of non-White population (greater than 50%) and a poverty rate that exceeds 40% or is three times the average census tract poverty rate for the metro/micro area, whichever threshold is lower. In Irvine, there were three racially and ethnically concentrated area of poverty (R/ECAP) areas, all three areas are surrounding the University of California, Irvine as shown on Figure B-7, Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) Map. There are concentrations of minority populations throughout the City. High concentrations of minority population can be found South of Sand Canyon Ave, in the Woodbridge neighborhood, and in the areas surrounding the University of California, Irvine.

Diversity Index

The Diversity Index from ESRI, an international supplier of geographic information system (GIS) software, web GIS and geodatabase management applications, represents the likelihood that two people, chosen at random from the same area, belong to different race or ethnic groups. The Housing Element utilizes ESRI's definition of the Diversity Index - ethnic and racial diversity. ESRI's diversity calculations accommodate up to seven race groups: six single-race groups (White, African American, American Indian, Asian, Pacific Islander, Some Other Race) and one multiple-race group (two or more races). Each race group is divided into two ethnic origins, Hispanic and Non-Hispanic. If an area is ethnically diverse, then racial diversity is compounded. The Diversity Index ranges from zero (no diversity) to 100 (complete diversity). If an area's entire population belongs to one race group and one ethnic group, then an area has zero diversity. An area's Diversity Index increases to 100 when the population is evenly divided into two or more race/ethnic groups.

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The relative diversity of different areas of the City is illustrated through the 2019 Diversity Index (Table B-2, Diversity Index by Zip Code, and Figure B-8, Diversity Index Map). The City's 10 zip codes each have a diversity index of 67.5 or higher, indicating that the City has high levels of diversity.

Table B-2. Diversity Index by Zip Code

ZIP CODE	DIVERSITY INDEX
92602	100
92603	100
92604	68.3
92606	67.5
92610	69.6
92612	68.5
92614	69.1
92617	69.9
92618	79
92620	87

Racially Concentrated Areas of Affluence

While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to "Racially Concentrated Areas of Affluence: A Preliminary Investigation" authored by Edward G. Goetz, Anthony Damiano, and Rashad A. Williams of the Center for Urban and Regional Affairs, University of Minnesota (a policy paper published by HUD), RCAA is defined as an affluent, White community. The policy paper goes on to state that "Whites are the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities."

RCAAs have not been studied extensively or defined precisely by the HCD or HUD. The Housing Element uses a definition recommended by Veronica Tam & Associates (part of the consulting team that assisted the City with this Housing Element), based on her extensive coordination with HCD and preparation of multiple Housing Elements in the San Diego Association of Governments region that concluded in June 2021. That definition uses the percent of White population (i.e., 40%) and median household income (top quartile) as proxies to identify potential areas of racial concentration and affluence.

According to the 2014–2018 ACS 5-Year Estimates, White households in the City have a median income of approximately $1,196, or 1%, more than all households. In the County, White households have a median income of approximately $4,106, or 5%, more than all households. As shown on Figure B-9, Racially Concentrated Areas of Affluence, census tracts with a White population over 40% and household income in the top median-income quartile of all City census tracts (greater than $135,500), are mostly located in the eastern portion of the Irvine Industrial Complex as well as the Turtle Rock, University Park, and Woodbridge neighborhoods. Table B-3 presents data from the 2014–2018 ACS 5-Year Estimates. As indicated in Table B-3, White

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Household Income and Population Percentage, White residents make up approximately 64% of City residents, compared to approximately 62% of County residents, according to the 2014–2018 ACS 5-Year Estimates.

Table B-3. White Household Income and Population Percentage

MEDIAN HOUSEHOLD INCOME	CITY OF IRVINE	COUNTY OF ORANGE
All Households	$100,969	$85,398
White Alone	$102,165	$89,504
White Population	64%	62%

Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of household.

Adults Living Alone or With Spouse

According to the 2014–2018 ACS 5-Year Estimates, the percentage of adults living with their spouse is approximately 47%, compared to approximately 52% of adults in the County. Local block groups with the highest shares of adults living with their spouse are located mainly in the City's north of the five Freeway and the 133 Toll Road, south of the 405 Freeway, and in the Orange County Great Park area, as seen on Figure B-10, Percent of Adults Living with Spouse Map. Approximately 9% of married-couple households in the City and approximately 9% of married-couple households in the County live below the poverty line.

Additionally, 11% of Irvine City heads of a household and 9% of County heads of households live alone. As shown on Figure B-11, Percent of Adults Living Alone Map, the largest share of adults living alone are near John Wayne Airport and the Irvine Spectrum Center. Census Tract 626.04, Block Group 5, has the highest share of adults living alone with 70.8% of heads of households living alone.

Children in Married-Couple Households

As stated in the AI, families with children often have special housing needs due to lower per capita income, the need for affordable childcare, the need for affordable housing, or the need for larger units with three or more bedrooms. Families with children and especially teenagers may face discrimination in the rental housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex or unit, confine children to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether. According to the 2014–2018 ACS 5-Year Estimates, approximately 84% of children under 18 live in married-couple households throughout the City, as shown on Figure B-12, Percent of Children in Married-Couple Families Map. This rate is highest within the City in the 92602 zip code, where 90% of children under 18

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live in married-couple households compared to approximately 74% in the County as a whole. A total of 7.5% of families in the City live below the poverty line.

Children in Single Female-Headed Households

Single-parent households require special consideration and assistance because of their greater needs for daycare, healthcare, and other facilities. According to HCD, female-headed households with children tend to have lower incomes, thus limiting housing availability for this group. Fair housing laws protect single parent households. According to the 2014–2018 ACS 5-Year Estimates, approximately 9% of children under 18 in the 92602 and 92618 zip codes and approximately 11% of children under 18 in the 92620 zip code live in female-headed households, as shown on Figure B-13, Percent of Children in Single Female-Headed Households Map.

Access to Opportunity

U.S. Department of Housing and Urban Development's Environmental Health Hazard Index (Ratings on Index)

The Environmental Health Hazard Index is a measure of potential exposure to harmful toxins at a neighborhood level. According to HUD, the values are inverted and then percentile ranked nationally, ranging from zero to 100. The higher the index value, the less exposure to toxins harmful to human health and the better the environmental quality of a census block-group.

As of 2018, the City has a wide range of ratings on HUD's environmental Health Hazard Index, with northwestern portions of the City rated generally between six and 33, while southern and northeastern portions of the City are rated generally between 37 and 70. This reflects higher exposure to environmental hazards in the areas closer to John Wayne Airport and along State Route 55, with lower exposure to environmental hazards in the areas farther from the airport and closer to preserved open spaces.

California Communities Environmental Health Screening Tool

The California Office of Environmental Health Hazard Assessment developed a screening methodology tool called the California Communities Environmental Health Screening Tool (CalEnviroScreen) to help identify California communities disproportionately burdened by multiple sources of pollution. Census tracts with high scores are more burdened by pollution from multiple sources and are most vulnerable to impacts, given the socio-economic characteristics and underlying health data. The Draft CalEnviroScreen 4.0 tool provides scores for all census tracts in Irvine. The census tracts in the City have low to moderate ratings ranging from two to 62, indicating low to moderate health burdens.

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Access to Public Transit

As stated in the AI, public transit helps people who cannot afford personal transportation or who elect not to drive. Elderly and disabled persons also rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Many lower income persons are also dependent on transit to go to work. Public transit that provides a link between job opportunities, public services and affordable housing helps to ensure that transit dependent residents have adequate opportunity to access housing, services and jobs.

The City of Irvine is served by Orange County Regional Transportation Authority (OCTA), Metrolink, iShuttle, OCTA ACCESS Program, Transportation for Irvine Residents with Disabilities (TRIPS), and the Age Well Senior Services Program. These transit providers offer a range of transit options throughout the City for Irvine residents.

Orange County Transportation Authority

OCTA is Irvine's largest public transportation provider. OCTA operates 77 routes providing local and express services within Orange County and express service to Los Angeles and Riverside counties. With 14 routes traveling in and through the IBC and connecting service to public transportation throughout Southern California.

Metrolink

Metrolink is a premier regional rail system, including commuter and other passenger services, which links people to employment and activity centers. Services run seven days a week along the Orange County Line, which serves Irvine.

iShuttle

A local Irvine public transit, iShuttle, is a shuttle service that provides:

- Three routes from the Tustin Metrolink Station serving the Irvine Business Complex/John Wayne Airport area.
- Three routes from the Irvine Station serving the areas between the Irvine Spectrum as well as the areas east and south of the station.

OCTA ACCESS Program

In compliance with the Americans with Disabilities Act (ADA) and Title VI of the Civil Rights Act, OCTA provides paratransit service throughout Orange County through its OCTA ACCESS program. ACCESS is an eligibility-based service for persons unable to use regular fixed-routes buses due to a disability. To be eligible for ACCESS, you must live within Orange County and be physically and/or cognitively unable to use a regular fixed-route bus. An in-person functional

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assessment will determine the applicant's ability to get to and from the bus stop, get on and off the bus and navigate the regular bus system. Curb-to-curb service is available for $3.60 each way.

Transportation for Irvine Residents with Disabilities (TRIPS)

Transportation for Irvine Residents with Disabilities (TRIPS) is available for Irvine residents (18+) who are unable to drive due to a permanent physical and/or cognitive disability. Services include door-to-door transportation, wheelchair accessible vehicles, rides granted on a first come, first serve basis and services are available on evening, weekend and holiday service contingent on demand. The annual registration fee is initially $25 and then $20 annually. One way to any location in Irvine is $1.90. Transportation to other areas is limited and costs range from $3.80 to $5.70 to other limited areas, costs vary on location and distance.

Age Well Senior Services Program

For seniors, the Age Well Senior Services Program is available to provide non-emergency medical transportation throughout South Orange County to persons age 60 and older who are not eligible to use OCTA ACCESS. Eligible Irvine residents can use the service to travel to medical, dental, physical therapy, dialysis and other health-related appointments. Each one-way trip costs $2.00 and the service operates Monday through Friday between 7 a.m. and 6 p.m.

AllTransit Performance Score

AllTransit is a data repository managed by the Center for Neighborhood Technology, an award-winning innovations laboratory for urban sustainability. AllTransit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. The City's AllTransit performance score is 3.6, while Orange County has a score of 4.2, illustrating a low combination of trips per week and number of jobs accessible, which enable only a few people to take transit to work in Orange County and even fewer in the City. Only 1.3% of workers in the City use public transportation (excluding taxicab) to get to work, which is less than Orange County's rate of 2.0% of workers. Figure B-14, Transit Proximity Map, illustrates what areas of the City are within a half-mile of a transit (primarily bus) stop. The locations of transit stops is based on data from Transitland, a community-edited data service aggregating transit networks across metropolitan and rural areas around the world.

Proximity to Jobs

As shown on Figure B-15, Jobs Proximity Map, as measured by HUD's Jobs Proximity, the majority of Irvine has an index value of over 70. The higher the index value, the better the access to employment opportunities for residents in the neighborhood. The areas with the closest proximity to jobs in the County are those near the Irvine Business Complex, University of California, Irvine, Irvine Spectrum Center, and Orange County Great Park.

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According to the 2014-2018 ACS 5 Year Estimates, the average commute travel times to work for City and County residents were 25.6 and 27.7 minutes, respectively. The area with the most limited access to jobs (as shown on Figure B-15) does have slightly higher rates of poverty or overpayment than other areas with index values between 40 and 59. Irvine is a major job center in Orange County, there are 128,029 workers living within the City who are employed across 13 major industrial sectors. Chapter 2 of the Housing Element presents additional information on employment by industry and occupation.

Education

The City of Irvine is primarily served by the Irvine Unified School District and Irvine Valley College.

The Elementary and Secondary Education Act (ESEA) was passed in 1965 and is regarded as the most far-reaching Federal legislation affecting education ever passed by Congress. The ESEA is an extensive statute that funds primary and secondary education while emphasizing equal access to education and establishing high standards and accountability. A major component of the ESEA is a series of programs typically referred to as "Title I." Title I programs distribute funding to schools and school districts with a high percentage of students from low-income families. To qualify as a Title I school, a school typically must have around 40% or more of its students coming from families who are low income. The programs also give priority to schools that are in obvious needs of funds, low-achieving schools, and schools that demonstrate a commitment to improving their education standards and test scores.

As of 2017, the Irvine Unified School District has nine Elementary Schools with Title 1 programs, these schools are Brywood, Culverdale, Deerfield, Greentree, Meadow Park, Northwood, Oak Creek, Springbrook, and University Park. There are also three Middle Schools with Title 1 programs, these schools are: Lakeside, South Lake, and Venado. The Title 1 schools are located throughout the City.

Figure B-16, Schools Proximity Map, shows what areas of the City are within one mile of a school. School access is consistent throughout the City, with a significant majority of the City's area and 14% of the projected units in the Sites Inventory located within one mile of a school. All projected units are within 2.6 miles from a school. The majority of the schools are considered high-quality, according to School-Ratings.com, with ratings distributed from the 71st to the 99th percentiles. As noted in Chapter 2 of the Housing Element, the Irvine Unified School District holds the distinction of the top school district in Orange County and is ranked #13 in the State out of 440 school districts

Population with a Disability

The ADA defines a disability as a "physical or mental impairment that substantially limits one or more major life activities." Fair housing choice for persons with disabilities can be compromised based on the nature of their disability. Persons with physical disabilities may face discrimination

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in the housing market because of the use of wheelchairs, need for home modifications to improve accessibility, or other forms of assistance. Landlords/owners sometimes fear that a unit may sustain wheelchair damage or may 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. Property owners often 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.

According to 2014–2018 ACS 5-Year Estimates, 3,147,477 residents in Orange County (8.6% of all County residents) were identified as having a disability. The percentage of population with disabilities in the Irvine-Lake Forest County Subdivision is 5.7%. Figure B-17, Percent of People with Disabilities Regional Map, takes a regional view, illustrating the share of residents with a disability in the Irvine-Lake Forest County subdivision and adjacent County subdivisions. The Orange County Regional Center, which is the regional center contracted by the California Department of Developmental Services, provides programs and services that further aid in meeting the needs of those with physical, mental, and developmental disabilities for Orange County residents.

According to the 2014-2018 ACS, 14,676 City residents, approximately 5.5%, of the Irvine population were identified as having a disability. The most common type of disability experienced by Irvine residents is ambulatory difficulty. Other common disabilities are, in order of prevalence, independent living difficulty, cognitive difficulty, hearing difficulty, self-care difficulty, and vision difficulty. Special housing needs for persons with disabilities fall into two general categories:

- Physical design to address mobility impairments.
- In-home social, educational, and medical support to address developmental and mental impairments.

According to the 2014-2018 ACS, 5,336 persons (36% of City residents) with a disability have a developmental disability. As shown on Figure B-18, Percent of People with Disabilities Local Map, the census block groups with the highest concentration of people with disabilities (i.e., more than 14.5%) are located in Planning Area 11. The City has Disability Services that provide support services and social programs to persons with disabilities, their families, caregivers and providers, who live or work in Irvine. Services and programs include:

- Social and Recreational programs for all ages.
- Community Disability Awareness Events.
- Disability Awareness Training.
- Irvine Residents with Disabilities Advisory Board.

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- Access Reporting.
- Inclusion and Accommodation support.
- Collaborations with Community Disability Agencies.

Residents with disabilities interested in receiving support services and participating in social programs can contact Disability Services via phone and via email at IDS@cityofirvine.org.

Disproportionate Housing Need and Displacement Risk

The Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements published by HCD in 2021 defines "disproportionate housing needs" as:

"a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area."

The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing. Many housing problems such as housing overpayment or overcrowded housing are directly related to the cost of housing in a community. If housing costs are high relative to household income, a correspondingly high prevalence of housing problems occurs. This appendix evaluates the disproportionate housing need and displacement risk.

Overpayment

According to the Federal government, overpayment is considered any housing condition where a household spends more than 30% of income on housing. A cost burden of 30% to 50% is considered moderate overpayment; payment in excess of 50% of income is considered severe overpayment. Overpaying is an important housing issue because paying too much for housing leaves less money available for emergency expenditures.

Cost Burden among Renters

According to the 2014-2018 ACS 5-Year Estimates, approximately 53% of housing units in the City are occupied by renters, higher than in the SCAG region that has a renter share of approximately 47% as shown on Figure 2-15 in Chapter 2 of the Housing Element. In the County, 28.2% of renter households have a rent burden greater than 30% of their income. In 47 of the City's 121 block groups, the share of cost burden renter households is even greater. As shown on Figure B-19, Renter Cost Burden Map, there are rent-burdened households throughout the City of Irvine. The highest concentration of renters overpaying for housing are in near the University of California, Irvine, and the Turtle Ridge and Shady Canyon neighborhoods. Affordable housing development will reduce the risk of resident displacement due to an inability to afford their home.

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More multifamily development in general will provide more housing choice for tenants using housing choice vouchers. The City will continue to refer residents interested in housing choice vouchers to Orange County for access to affordable housing (PP G.5: Housing Choice Vouchers).

As mentioned previously, Chapter 2 of the Housing Element uses the Southern California Association of Governments pre-certified data that includes information from HUD on the number of households in the City who pay 30% or more of their gross income on housing costs. More specifically, 50% of the City's renter households spend 30% or more of gross income on housing costs, compared to 55% in the SCAG region. Additionally, 26% of renter –occupied households experience a severe housing cost burden (i.e., above 50% of gross income), compared to 29% in the SCAG region as illustrated on Figures 2-22 and 2-23 in Chapter 2 of the Housing Element. According to the 2014-2018 ACS 5-Year Estimates, renter households are more likely than owner-occupied households are to experience housing cost burden.

Cost Burden among Owners

According to the 2014-2018 ACS 5-Year Estimates, approximately 47% of housing units in the City are owner occupied. Among homeowners, overpayment is most prevalent for households with incomes of $74,999 or less. Approximately 92% of Irvine mortgage-holding households with incomes of $74,999 or less have payments that exceed 30% of the household income, while only 28% of households with incomes of $75,000 or more have payments that exceed 30% of income. (Figures 2-25 and 2-26 in Chapter 2 of the Housing Element). As shown on Figure B-20, Owner Cost Burden Map, the most concentrated areas of overpayment for owner-occupied housing are near Orange County Great Park, Irvine Spectrum Center, Turtle Ridge, Irvine Valley College, and Lower Peters Canyon. Citywide, only 38% of owner-occupied households with a mortgage have a cost burden, indicative of the City's supply of relatively affordable ownership housing options.

Overcrowding

Some households may not be able to accommodate high cost burdens for housing, but may instead accept smaller housing or reside with other individuals or families in the same home. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding.

Household overcrowding is considered reflective of various living situations:

a. A family lives in a home that is too small.

b. A family chooses to house extended family members.

c. Unrelated individuals or families are doubling up to afford housing. Not only is overcrowding a potential fair housing concern, it can strain physical facilities and the

delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes.

As described in Chapter 2 of the Housing Element, overcrowding is not a significant problem, with 4% of the total housing units in the City living in overcrowded situations. Throughout the Southern California Associations of Governments area, 10% of households are overcrowded. More specifically in the City, the 2014-2018 ACS 5-Year Estimates indicate that 958 homeowner and 4,921 renter households had more than one occupant per room. Of these households, 288 homeowner households and 1,484 renter households (a combined 2% of all City households, compared to 4% in the SCAG area) had more than 1.5 occupants per room, which meets the ACS definition of "severe overcrowding" (Figure 2-28 in Chapter 2 of the Housing Element).

Housing Conditions

As discussed in the Community Profile, a relatively low number of housing units in Irvine are in need of some rehabilitation due to age or incomplete facilities. Substandard housing issues can include structural hazards, poor construction, faulty wiring or plumbing, fire hazards, and inadequate sanitation or facilities for living. The 2014–2018 ACS 5-Year Estimates indicate the following on substandard housing issues in the City:

- 1,645 units lack telephone service.
- 128 units have inadequate plumbing.
- 917 units in are without a complete kitchen.

Given the relatively young age of the housing stock, the number of substandard housing units is limited. Irvine rigorously pursues code enforcement and housing rehabilitation programs to improve and maintain the housing stock.

The City will assist homeowners to identify and apply for rehabilitation funding, to expand code enforcement efforts if necessary, and to provide safe housing conditions education (PP-K.2, Residential Rehabilitation Program).

Displacement Risk

The Urban Displacement Project (UDP) is a research and action initiative of University of California, Berkeley that conducts community-centered, data-driven, applied research toward more equitable and inclusive futures for cities. Their research aims to understand and describe the nature of gentrification, displacement, and exclusion and to generate knowledge on how policy interventions and investment can respond and support development that is more equitable.

The UDP defines "residential displacement" as "the process by which a household is forced to move from its residence – or is prevented from moving into a neighborhood that was previously

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accessible to them because of conditions beyond their control." As part of this research project, the UDP has an interactive map that display changes in neighborhood characteristics that may indicate displacement.

The UDP identifies sensitive communities as those that have neighborhoods with a high proportion of residents vulnerable to displacement in the case of rising housing costs and market-based displacement pressures present in and/or near the community. Census tracts alongside the 5 Freeway and north of the 133 Toll Road Valley, North West of Culver Drive, and in the Irvine Business Complex are labeled as vulnerable to displacement by the UDP.

Enforcement and Outreach Capacity

The City reviews its zoning laws and policies on an ongoing basis to ensure compliance with fair housing law. Regular reviews of policies and practices ensure that, as the City grows and changes, it continues to ensure and enforce that all persons have access to sound and affordable housing. Housing Element Goal 8: Affirmatively Furthering Fair Housing and corresponding policies and programs have been included in Chapter 8, Housing Plan, of the Housing Element to promote and affirmatively further fair housing opportunities throughout the community for all persons regardless of age, race, religion, color, ancestry, national origin, sex, marital status, disability, familial status, or sexual orientation.

The City will continue to promote fair housing through its laws, policies, and programs, and make fair housing information available to tenants, homebuyers, property owners, and landlords. Fair housing issues that may arise include but are not limited to the following:

- Housing design that make a dwelling unit inaccessible to an individual with a disability.
- Discrimination against race, national origin, familial status, disability, religion, or sex when renting or selling a housing unit.
- Addressing housing needs disproportionately across the City.

Fair Housing Foundation

The City of Irvine contracts with the Fair Housing Foundation (FHF), a nonprofit organization dedicated to affirmatively furthering fair housing choice through the provision of education and direct client services. To promote awareness of fair housing laws, FHF implements targeted outreach and education programs for housing consumers including homeowners, prospective homebuyers and tenants as well as housing providers such as sellers, owners, real estate professionals, brokers, landlords and property management firms. Using available data to analyze current discrimination trends, FHF disseminates brochures that promote awareness of specific fair housing issues in an effort to ensure that all persons have the opportunity to secure safe and decent housing that they desire and can afford, without regard to their race, color,

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religion, gender, sexual orientation, national origin, familial status, marital status, disability, ancestry, age, source of income or other characteristics protected by laws. Direct client services range from providing advice concerning general housing issues to performing investigations and advising residents of their rights and remedies under the law in cases where evidence sustains the allegations of discrimination. The FHF's office is in Orange, and its staff can be reached via email or via a phone.

Most fair housing cases will require some level of investigation by FHF. Standard investigations include property title searches, scouting, telephone tests, on-site pair tests, document review, statistical analysis and evaluation of witness statements. Testing is a procedure approved by the courts whereby non-applicants pose as applicants for a particular housing opportunity to see if members of different protected classes are treated differently. FHF conducts its investigations and testing using internal guidelines developed using resources such as the John Marshall Law School Tester's Guide to Fair Housing and Fair Housing Laws. Trained staff and volunteers are used to conduct telephone and on-site pair tests.

During the 5th Cycle period, FHF counseled and screened 224 households for potential fair housing violations, Table B-4, Potential Housing Violations by Protected Class, shows the breakdown of the 224 potential fair housing violations by protected class. This screening process resulted in 40 of the households screened (18%) with a case opened because information gathered through the screening and counseling phase substantiated possible discrimination. Twenty-one (52.5%) of the 40 cases involved allegations of housing discrimination based on physical disability and seven cases involved a mental disability. Table B-5, Cases Opened by Protected Class, shows the breakdown of all 40 cases opened by protected class.

Table B-4. Potential Housing Violations by Protected Class

PROTECTED CLASS	NUMBER OF COMPLAINTS	PERCENT OF TOTAL COMPLAINTS
Age	2	0.9%
Arbitrary	3	1.3%
Familial Status	4	1.8%
Gender	8	3.6%
Marital Status	3	1.3%
Mental Disability	43	19.2%
National Origin	9	4.0%
Physical Disability	123	54.9%
Race	13	5.8%
Religion	3	1.3%
Source of Income	10	4.5%
Student Status	1	0.4%
Sexual Orientation	2	0.9%
Total	**224**	**100.0%**

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Table B-5. Cases Opened by Protected Class

PROTECTED CLASS	NUMBER OF COMPLAINTS	PERCENT OF TOTAL COMPLAINTS
Age	1	3%
Familial Status	2	5%
Mental Disability	7	18%
National Origin	2	5%
Physical Disability	21	53%
Race	5	13%
Religion	1	3%
Sexual Orientation	1	3%
Total	**40**	**100%**

Of the 40 cases opened, 17 (42.5%) resulted in final findings that sustained the allegations of discrimination. Table B-6, Final Findings of Opened Cases, shows the breakdown of the 40 cases by final findings.

Table B-6. Final Findings of Opened Cases

FINAL FINDINGS	NUMBER OF CASES	PERCENT OF TOTAL CASES
Sustains the Allegation	17	42.5%
Inconclusive	5	12.5%
Investigation in Progress	3	7.5%
No Evidence	14	35.0%
Pending	1	2.5%
Total	**40**	**100%**

During the 5th Cycle period, FHF counseled 2,449 landlord and tenant complaints. Of the 2,449 total complaints, 464 (18.9%) were for notices and 335 (13.7%) were for habitability. Table B-7, Landlord and Tenant Complaints during 5th Cycle Period, shows the breakdown of the types of landlord tenant complaints received.

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Table B-7. Landlord and Tenant Complaints during 5th Cycle Period

COMPLAINT	NUMBER OF COMPLAINTS	PERCENT OF TOTAL COMPLAINTS
Abandonment	6	0.2 %
Accommodations and Modifications	167	6.8 %
Commercial Property	0	0.0 %
Eviction	89	3.6 %
Foreclosure-Owner	0	0.0 %
Foreclosure-Tenant	9	0.4 %
General Issue	132	5.4 %
Habitability	335	13.7 %
Harassment	77	3.1 %
Illegal Entry	33	1.3 %
Illegal Lockout	0	0.0 %
Late Fees	14	0.6 %
Lease Terms	295	12.0 %
Notices	464	18.9 %
Nuisance	72	2.9 %
Other	0	0.0 %
Parking	1	0.0 %
Pets	7	0.3 %
Property for Sale	17	0.7 %
Refusal to Rent	63	2.6 %
Refusal to Sell	2	0.1 %
Relocation	30	1.2 %
Rent Control	0	0.0 %
Rent Increase	93	3.8 %
Retaliation	34	1.4 %
Rights & Responsibilities	128	5.2 %
Section 8 Information	30	1.2 %
Security Deposit	268	10.9 %
Unlawful Detainer	66	2.7 %
Utilities	17	0.7 %
Total	**2449**	**100.0 %**

Department of Fair Employment and Housing

The mission of the California Department of Fair Employment and Housing (DFEH) is to protect Californians from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, DFEH keeps track of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence.

FHF reporting indicates the one case was filed with the California Department of Fair Employment and Housing by an Irvine resident during the 5th Cycle period.

Fair Housing Legal Status

During the 5th Cycle period, no cases were filed in a court of competent jurisdiction by FHF to enforce fair housing laws. FHF was successful in conciliating or otherwise addressing the fair housing cases that were investigated on behalf of Irvine residents during this time period; therefore, there is no litigation to report.

Housing and Urban Development

HUD maintains a record of all housing discrimination complaints for the City. According to the HUD website, any person who feels their housing rights have been violated may submit a complaint to HUD via phone, mail, email, and with FHEO online in English or Spanish. These grievances can be filed based on race, color, national origin, sex, disability, religion, familial status, and retaliation. HUD refers complains to the DFEH, which has 30 days to address the complaint. As a substantially equivalent agency, the DFEH's findings are usually accepted by HUD. Thereafter, HUD tracks the complaint and its issues and outcomes as a "dually filed" complaint.

During the prior Housing Element Cycle period, there were no cases referred to HUD.

Other Relevant Factors

Other contributions that affect the accumulation of wealth and access to resources include historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing. As documented in this Housing Element, Irvine is a relatively young master-planned community that has historically made significant investments in infrastructure and affordable housing. Additionally, the Housing Plan includes programs to provide assistance to lower income homeowners for residential rehabilitation, preserve at-risk affordable housing units with expiring affordability covenants during the 6th Cycle time period and to ensure the furthering of affirmatively fair housing.

Sites Inventory

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for Housing Elements to analyze the location of lower-income sites in relation to areas of high opportunity.

The TCAC and the HCD prepared opportunity maps that identify resource areas. Areas of high or highest resource have increased access to public services, educational and employment opportunities, medical services, and other daily services (e.g., grocery, pharmacy).

Figure B-21, Sites Inventory Map, illustrates the location of the sites throughout the City, which are detailed in the Sites Inventory. Affordability assumptions are made to balance locating lower-income sites in areas that are already zoned for higher-density residential development and in areas with access to resources:

- **Improved Conditions:** The sites are intentionally located throughout the City by implementing a program to update the City's Land Use Element and Zoning Ordinance (which will include residential overlays in existing commercial areas) to encourage diverse neighborhoods and to provide the best amenities that the City has to offer, particularly for

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lower-income households. “Amenities” in this context refers to access to employment centers, commercial areas, schools, transit, parks, and public services.

- **Exacerbated Conditions:** Some sites are located in areas of greater minority and/or poverty concentration as sites are located throughout the City. In particular, lower-income sites in Planning Area 23 are located in an area with a very high concentration of Asian residents. Planning Area 36, which contains sites for units at all income levels, is located in a Low Resource area as identified by the 2021 TCAC/HCD Opportunity Areas Map. Pursuant to State law and HCD guidance, the City has identified lower-income sites in areas where the existing zoning allows for higher-density development (per the HCD guidelines). However, the City mitigates the impact of this concentration by identifying lower-income sites in other areas of the City, including Planning Areas 4 and 51.

Integration and Segregation: Race and Income

The City only has eight block groups with a poverty concentration, while minority concentration areas are located throughout the City. Lower-income sites are slightly more likely to be located in minority and poverty concentration areas, as detailed in the following:

- 61% of lower-income units are located in (overall) minority concentration areas compared to 54% of moderate- and above-moderate-income units.
- 49% of lower-income units are located in Asian concentration areas compared to 24% of moderate- and above-moderate-income units.
- 17% of lower-income units are located in African American concentration areas compared to 12% of moderate- and above-moderate-income units.
- 53% of lower-income units are located in Hispanic concentration areas compared to 74% of moderate- and above-moderate-income units.
- 8% of lower-income units are located in poverty concentration areas compared to 5% of moderate- and above-moderate-income units.

Planning Areas 36 and 51, where the majority of current high-density-zoned sites are located, are not among the City’s poverty concentration areas. These areas are still appropriate locations for lower-income housing due to their high-density zoning and proximity to jobs, transit, schools, and public services.

Racially/Ethnically Concentrated Areas of Poverty

The R/ECAPs in the City contain less than 2% of the sites, all of which are located near the University.

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Access to Opportunity

Figure B-1 shows housing sites identified in the Sites Inventory in relation to resource areas defined by the 2021 TCAC/HCD Opportunity Areas Map. The sites currently identified to accommodate the lower-income housing need are located in areas throughout the City (in compliance with State law), including currently nonresidential zoned areas that the City has identified for rezoning. Approximately 36% of the lower-income units and 23% of the moderate- and above-moderate-income units are located in the City's single significant moderate resource area.

Per the 2021 TCAC/HCD Opportunity Areas Map, the City has four low resource areas. The rest of the City is either a moderate resource, high resource, or highest resource area. Lower-income units are more concentrated in the former (36%) but are less concentrated in the latter (1%).

Lower-income sites have a weighted job index score of 96 compared to a score of 97 for moderate- and above-moderate income sites, indicating more access to jobs for all income categories. This is due in large part to the higher job indices (above 60) for all block groups:

- The majority of inventory sites are located in close proximity to bus stops or transit bases.
- 19% of lower-income units are located within one mile of a school compared to 13% of moderate and above-moderate units. All residential units are located within 2.6 miles of schools.
- 21% of all units in the Sites Inventory are designated for lower-income households.

The Housing Element includes several policies to encourage lower-income housing near such amenities (HE-G.2, HE-L.3, HE-L.5, and HE-L.6). The City will ensure that residents of new lower-income housing will have access to these types of amenities.

Summary

The City's Sites Inventory (with support from the City's rezone strategy) will affirmatively further fair housing through the following:

The distribution of candidate rezone sites across resource areas (including the higher share of lower-income units located in the City's TCAC/HCD moderate resource areas and in areas with better access to jobs, transit, schools, public services, and other amenities)

Contributing Factors

A fair housing contributing factor is a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Surveys of the community and discussions with community members, affordable housing developers, and an assessment of fair housing issues identified several factors that contribute to fair housing in the City of Irvine, including (Table B-8, Factors that Contribute to Fair Housing Issues in Irvine) the following.

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Table B-8. Factors that Contribute to Fair Housing Issues in Irvine

AFH IDENTIFIED FAIR HOUSING ISSUES	CONTRIBUTING FACTORS	PRIORITY (HIGH, MEDIUM, LOW)	MEANINGFUL ACTIONS
Displacement of residents due to economic pressures	There is a shortage of affordable rental and homeownership options		Assist with Development of Low-Income Housing (PP-B.1) Expedite Development (PP-B.2) Explore Dedicated Staff for Affordable Housing Entitlement, Permit and Fee Processes (PP-B.5) Plan to Encourage and Incentivize ADUs (PP-C.4) Continue the Conservation and Monitoring of Existing and Future Affordable Units (PP-D.2) Inclusionary Housing Ordinance Update (PP-E.3) Leverage City-Owned Land for the Development of 100% Affordable Housing Projects (PP-F.1) Continue to Apply "Additive" Intensity (under the Land Use Element) for Affordable Housing (PP-G.1) Displacement Prevention (PP-J.2) Leverage all Funding Options (PP-I.3)
Lack of renter protections	The economic uncertainty tied to ongoing pandemic has increased the risk of displacement for lower income households		Displacement Prevention (PP-J.2) Provide Information and Education to Residents on the City's Website (PP-M.1)
Land use and zoning laws	There are areas in Irvine with underutilized, such as retail centers and hotels, that could provide new affordable housing opportunities for Irvine residents		Update the City's Zoning Ordinance to Allow for Higher Densities in Areas with Underdeveloped/Underutilized Property (PP-C.1) Continue to Apply "Additive" Intensity (under the Land Use Element) for Affordable Housing (PP-G.1) Zoning Changes (PP-G.3) Update the City's Zoning Ordinance and Policies Related to Emergency Shelters, Low-Barrier Navigation Centers, Supportive Housing, and Group Care Facilities to Comply with Current Laws (PP-I.1) Update and Implement the City's General Plan - Land Use Element/Amend Zoning Ordinance (PP-L.1)
Community Opposition	There is community opposition in some Irvine neighborhoods to accessory dwelling units		Establish ADU Policies to Comply with Changes in State Law (PP-C.2) Remove Barriers for ADUs (PP-C.3) Plan to Encourage and Incentivize ADUs (PP-C.4) Adopt Ordinances and Policies that Encourage a Diverse Housing Stock (PP-G.2)
Lack of supportive housing in community-based settings	Permanent supportive housing can be better integrated in multifamily housing		Update the City's Zoning Ordinance and Policies Related to Emergency Shelters, Low-Barrier Navigation Centers, Supportive Housing, and Group Care Facilities to Comply with Current Laws (PP-I.1) Housing Options (PP-I.2)

As identified in the assessment of disproportionate housing need and displacement risk there is a shortage of both rental and ownership housing that is affordable to all lower-income households. The City is aware of this affordability issue and has identified the need for a variety of types of affordable housing as well as improving access to amenities and opportunities in low resource areas as priorities to meet unmet needs and address fair housing. The City has incorporated actions throughout the Housing Element goals, policies, and programs to address these factors, and all issues identified in this assessment. The programs in this Housing Element will affirmatively further fair housing, per AB 686, and are intended to address significant disparities in housing needs and in access to opportunity for all groups protected by State and Federal law. Furthermore, the programs in this Housing Element will ensure that the City of Irvine furthers patterns of integration and development of affordable housing in such a way that it will have a positive impact on residents of the City and the region.

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Figure B-1. TCAC/HCD Opportunity Area Map

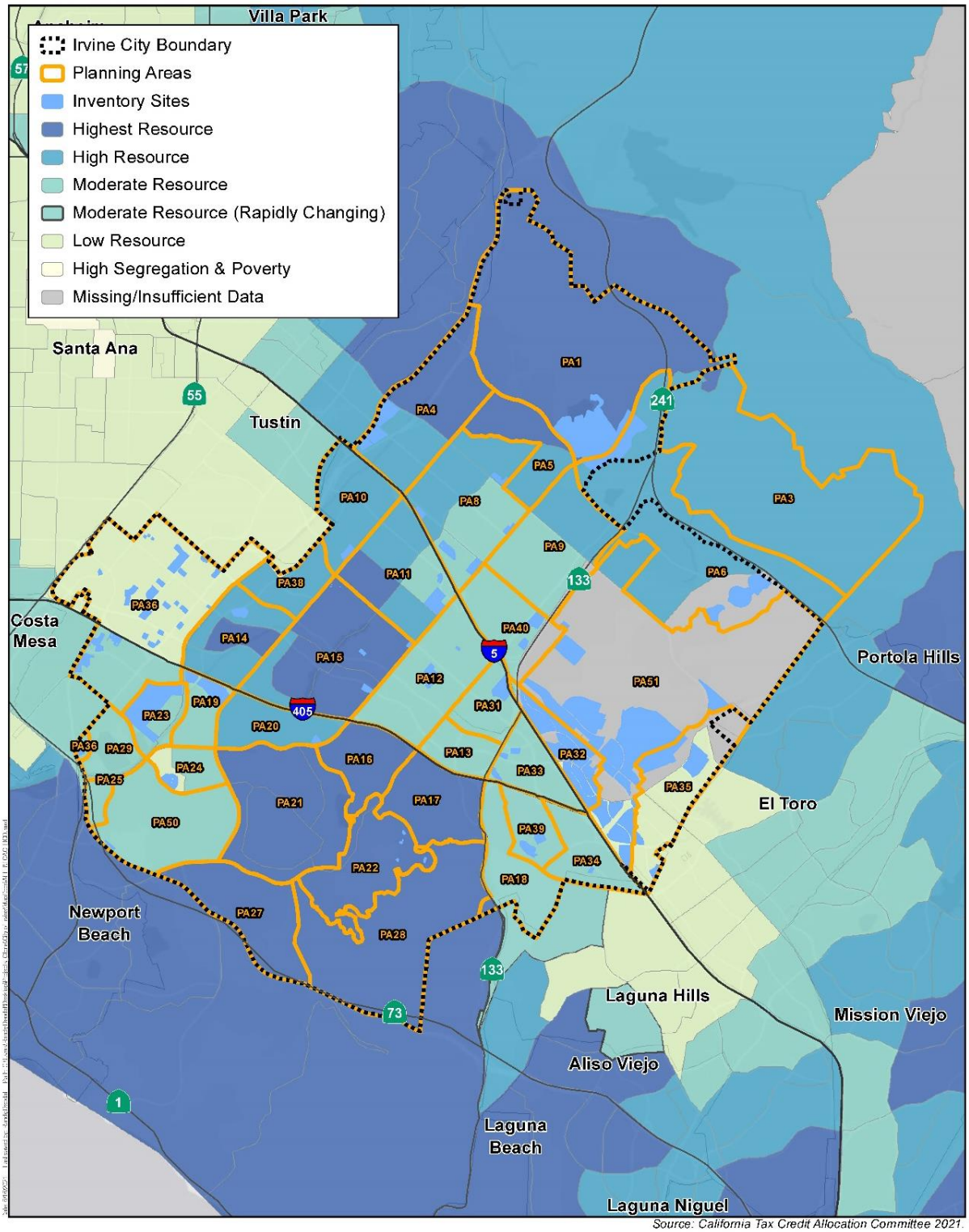


Figure B-2. Minority Concentration Map

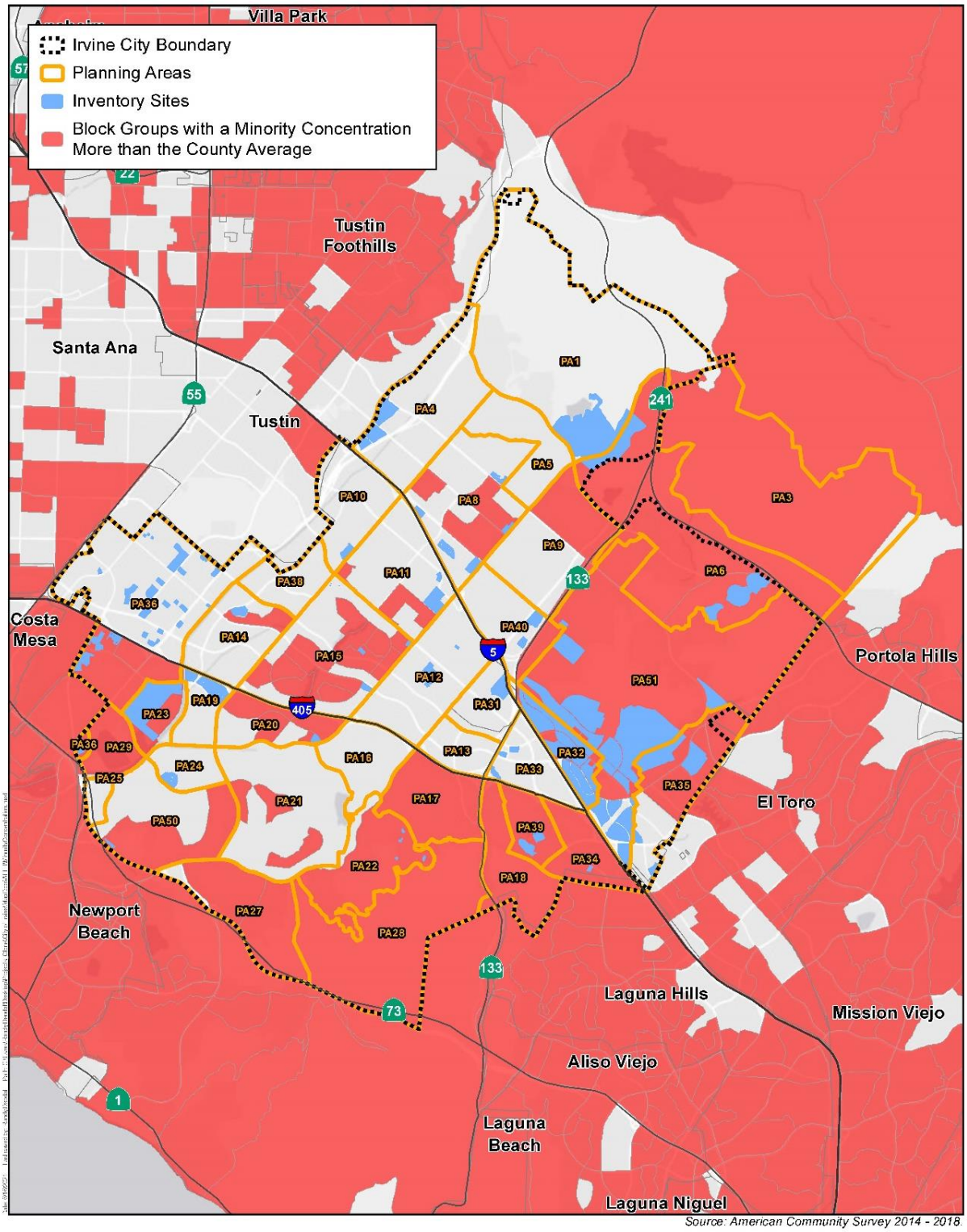


Figure B-3. Asian Concentration Map

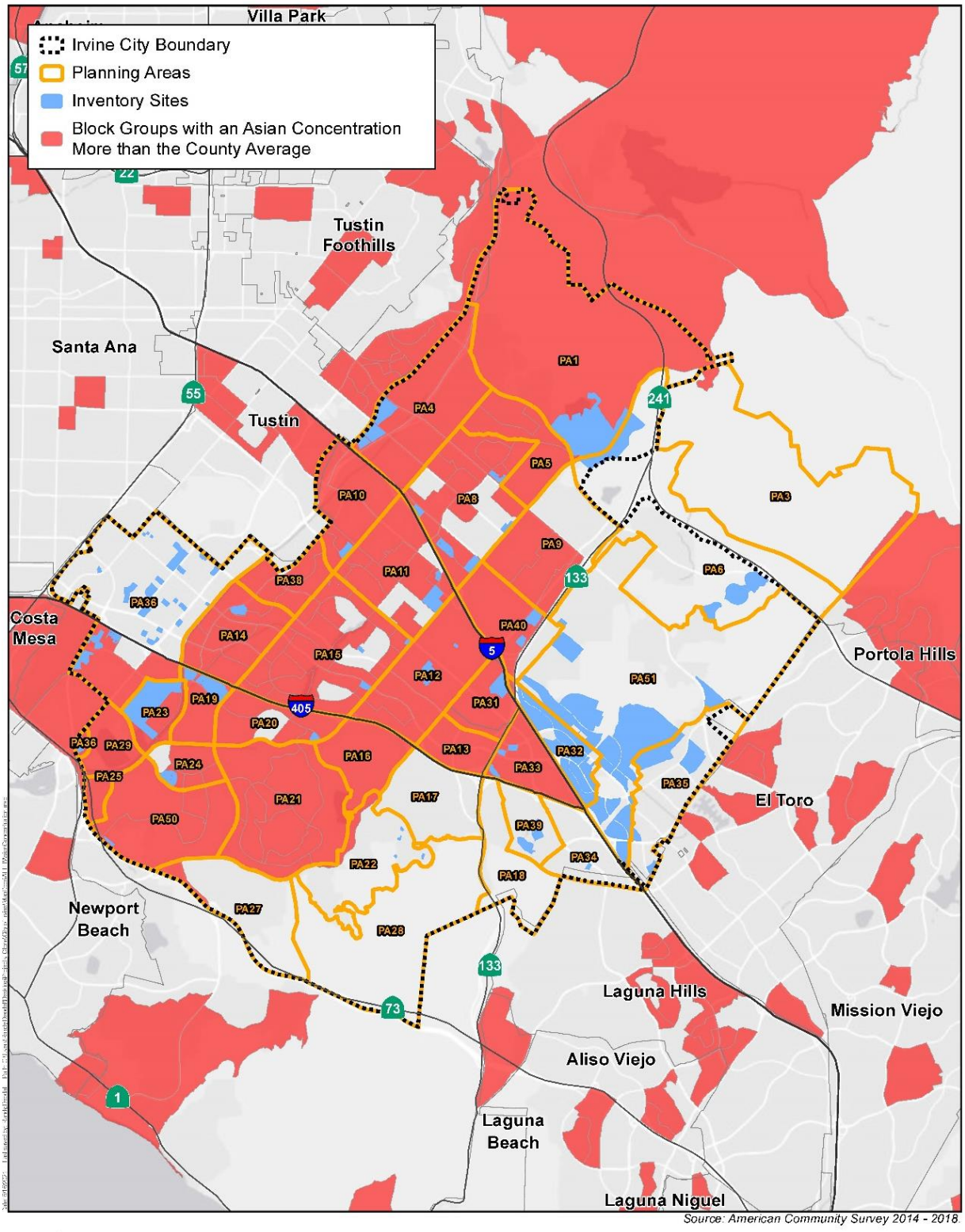


Figure B-4. Hispanic Concentration Map

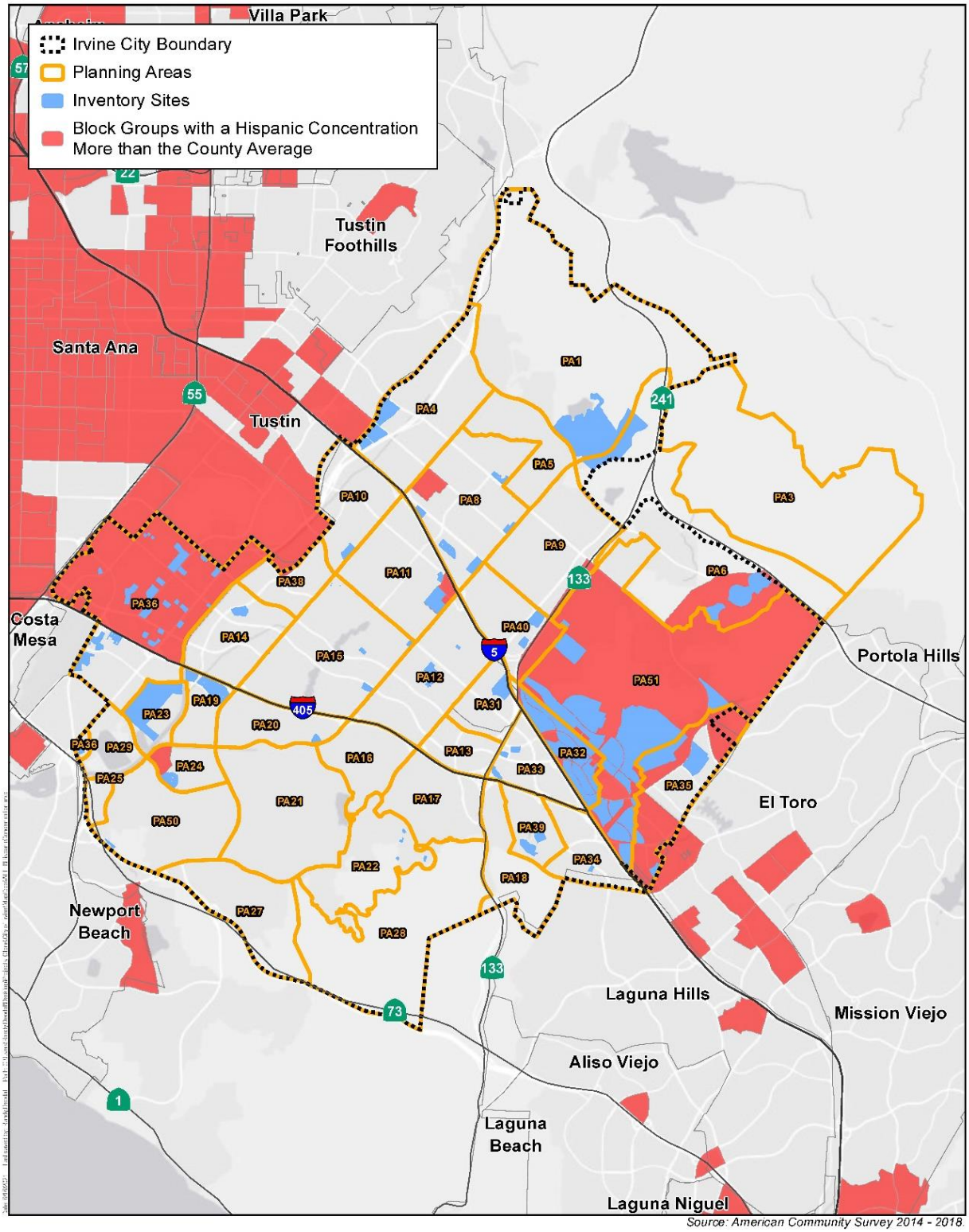


Figure B-5. African American Concentration Map

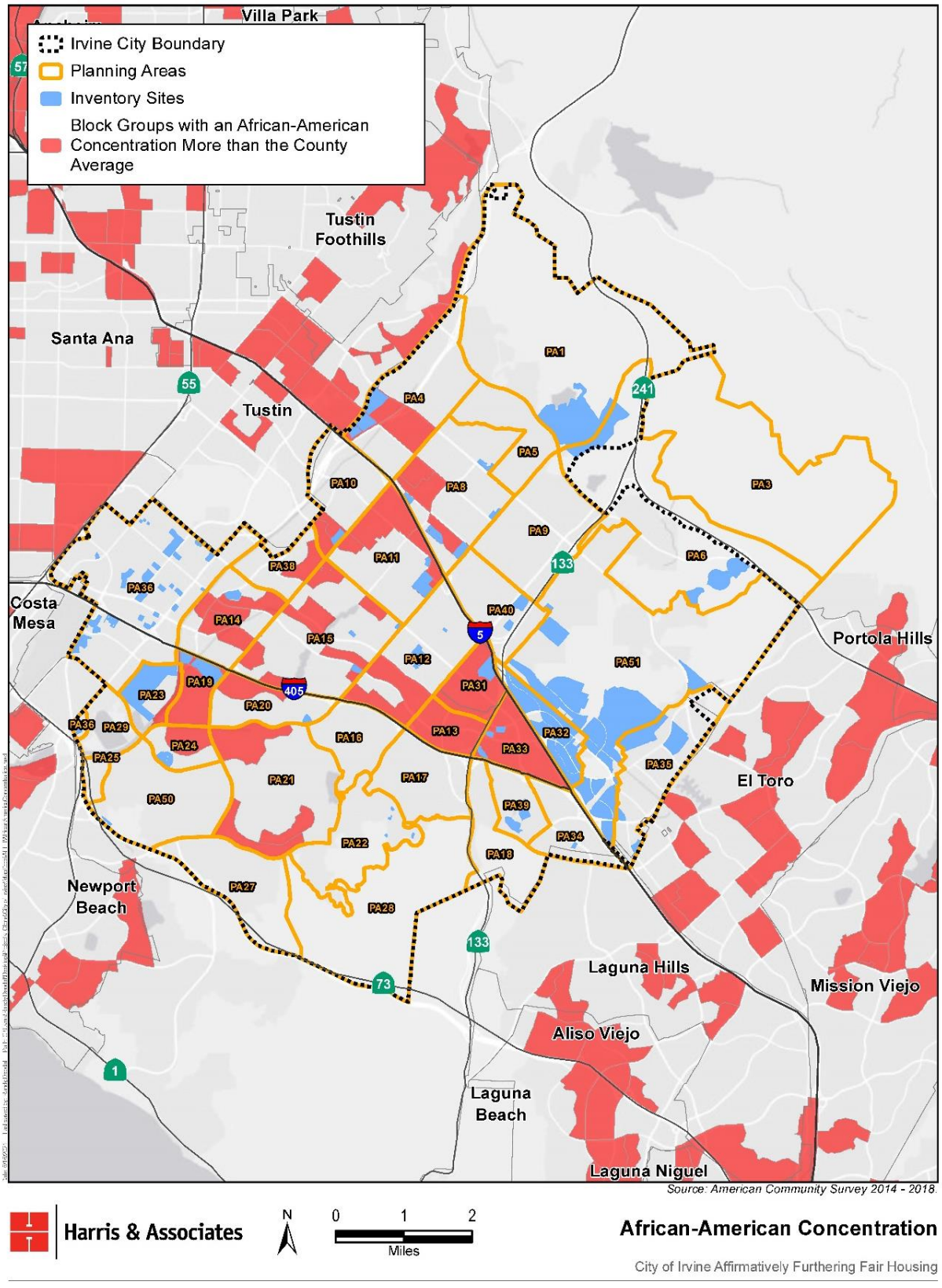


Figure B-6. Poverty Concentration Map

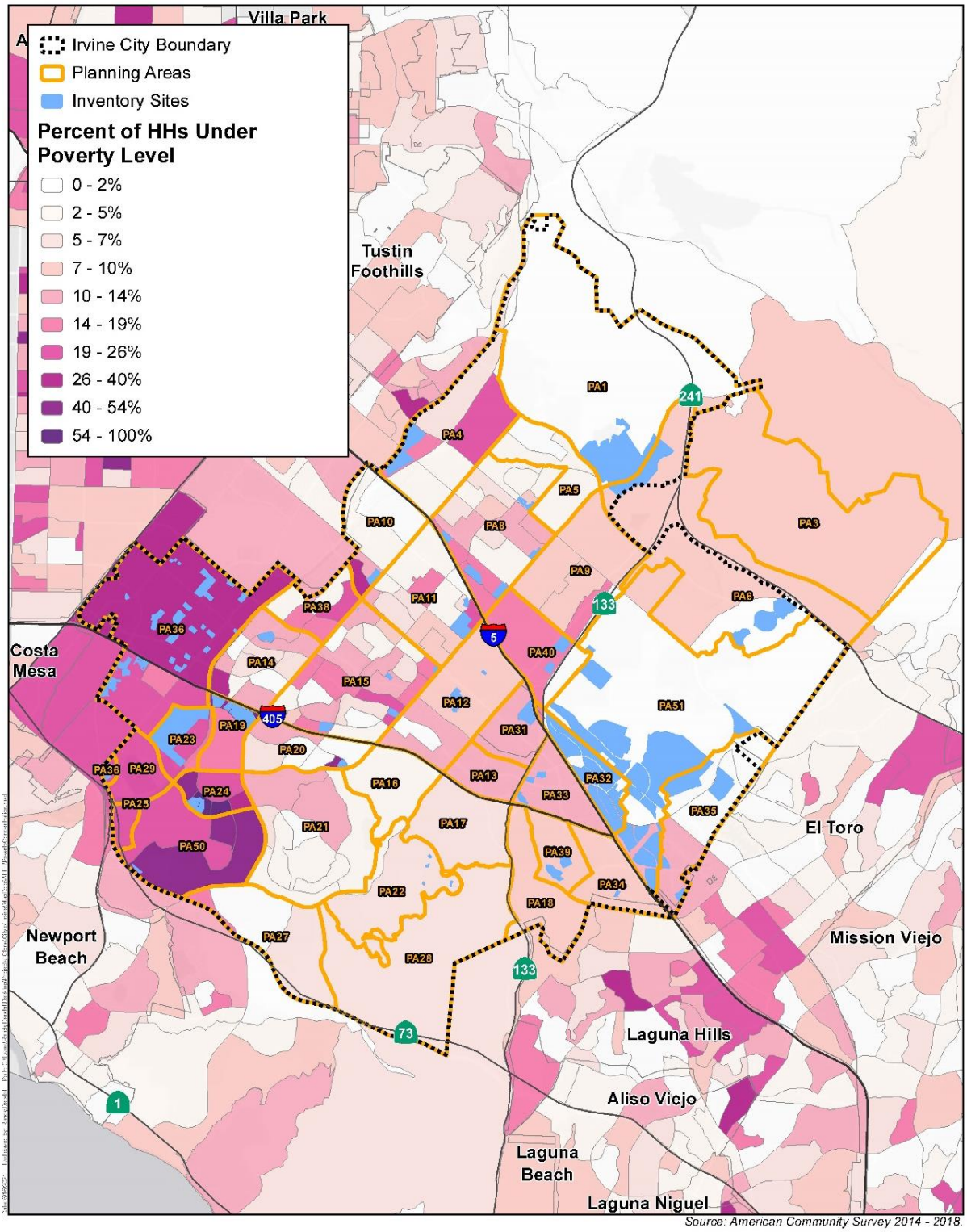


Figure B-7. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) Map

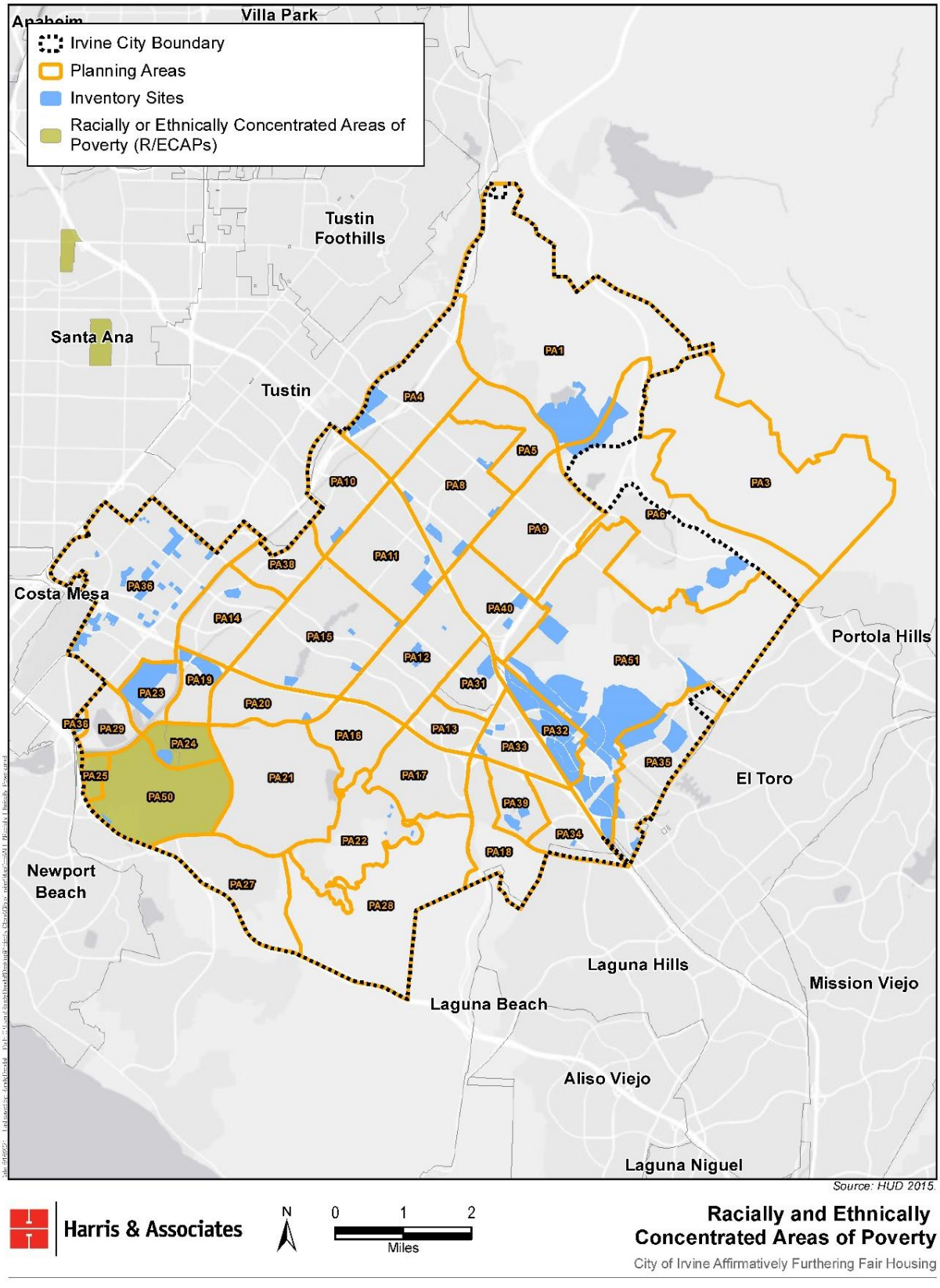


Figure B-8. Diversity Index Map

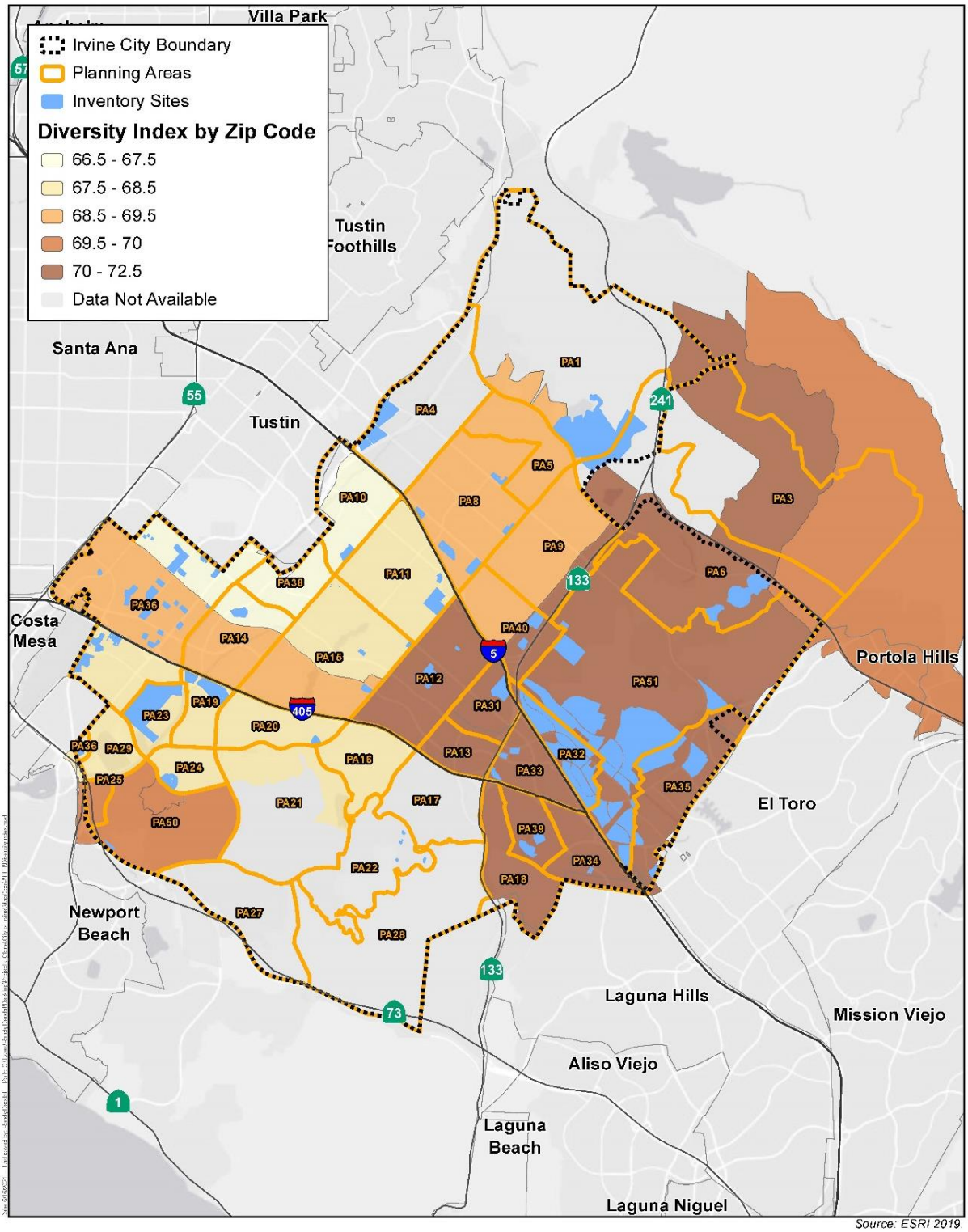


Figure B-9. Racially Concentrated Areas of Affluence

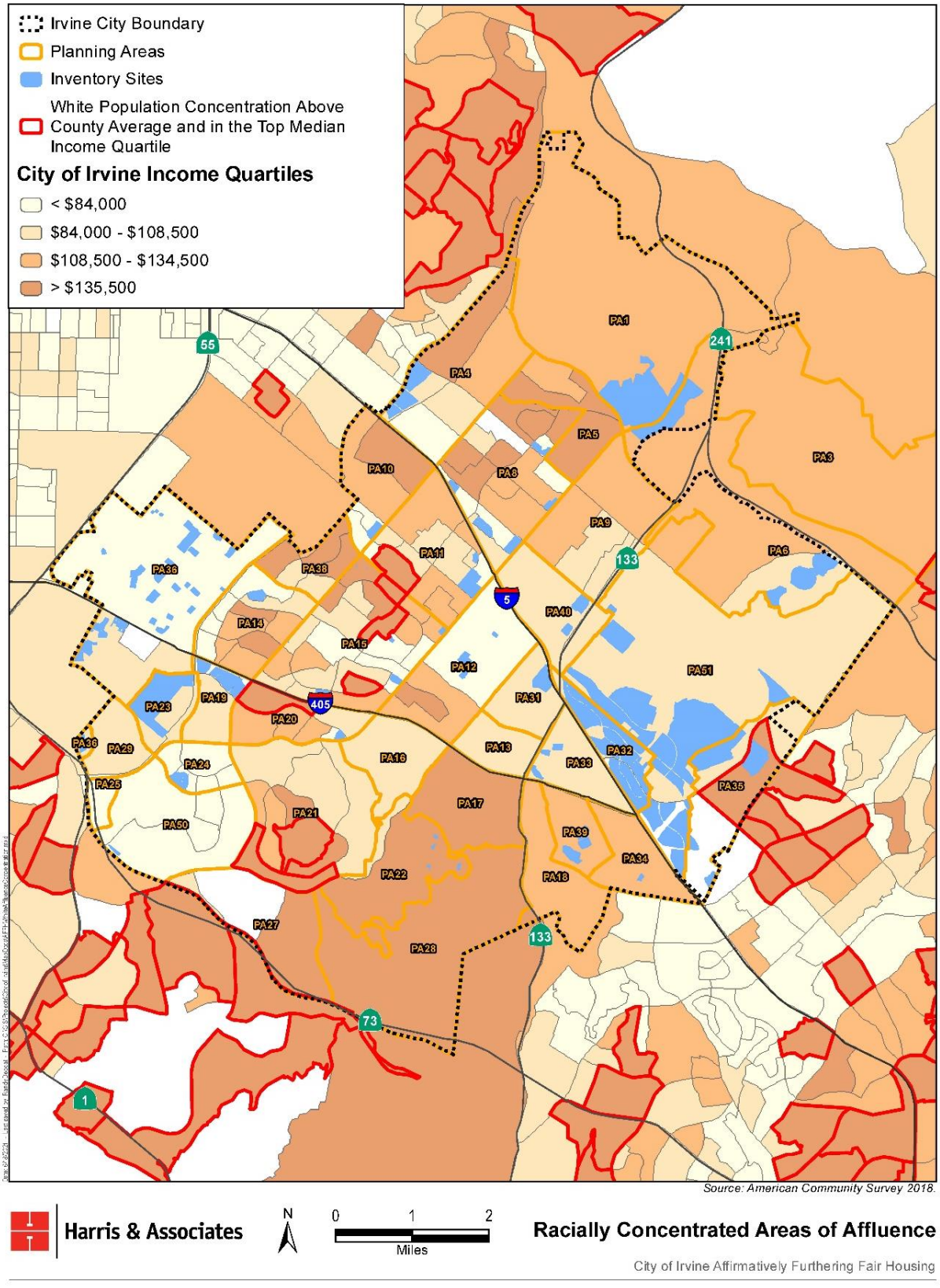


Figure B-10. Percent of Adults Living with Spouse Map

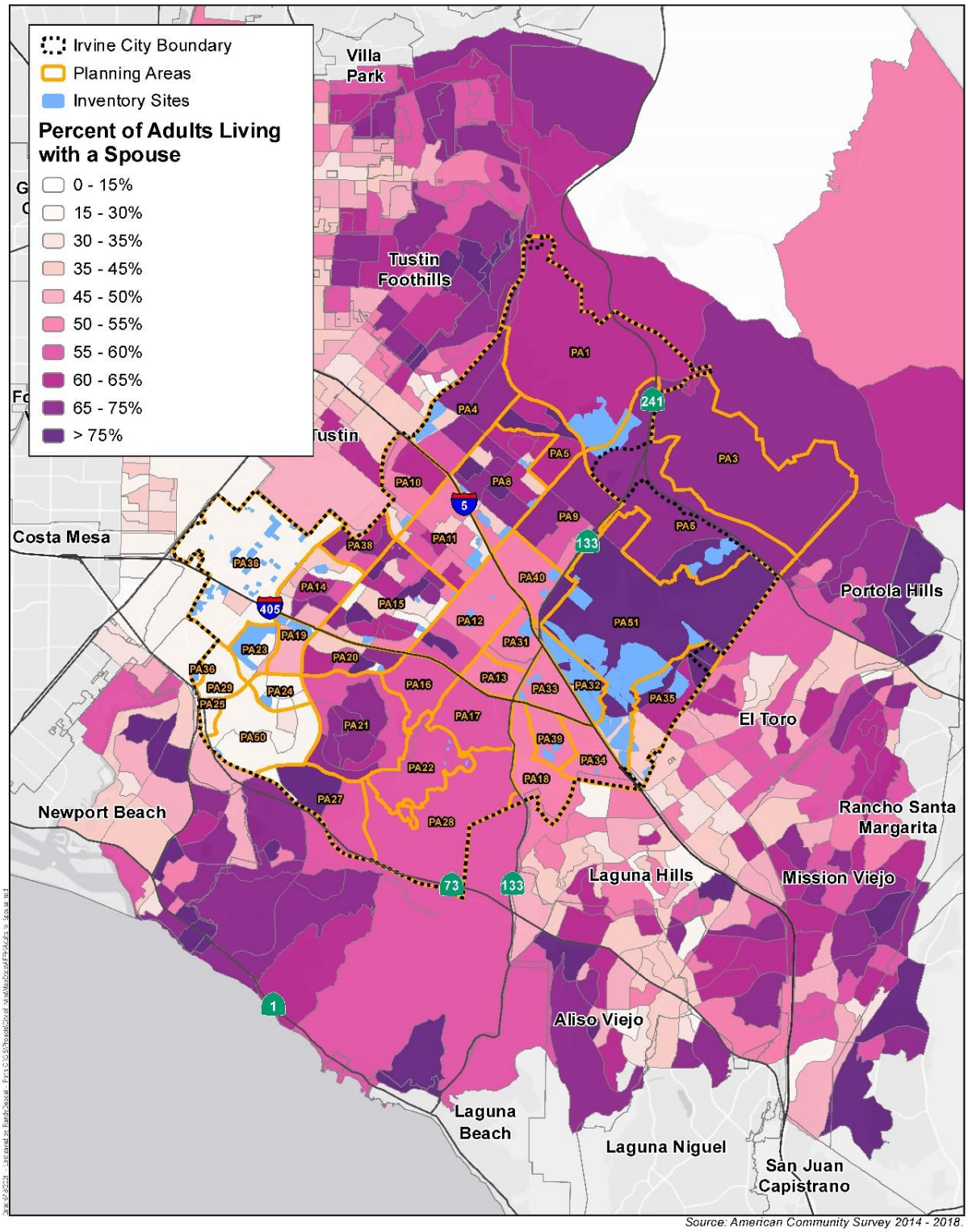


Figure B-11. Percent of Adults Living Alone Map

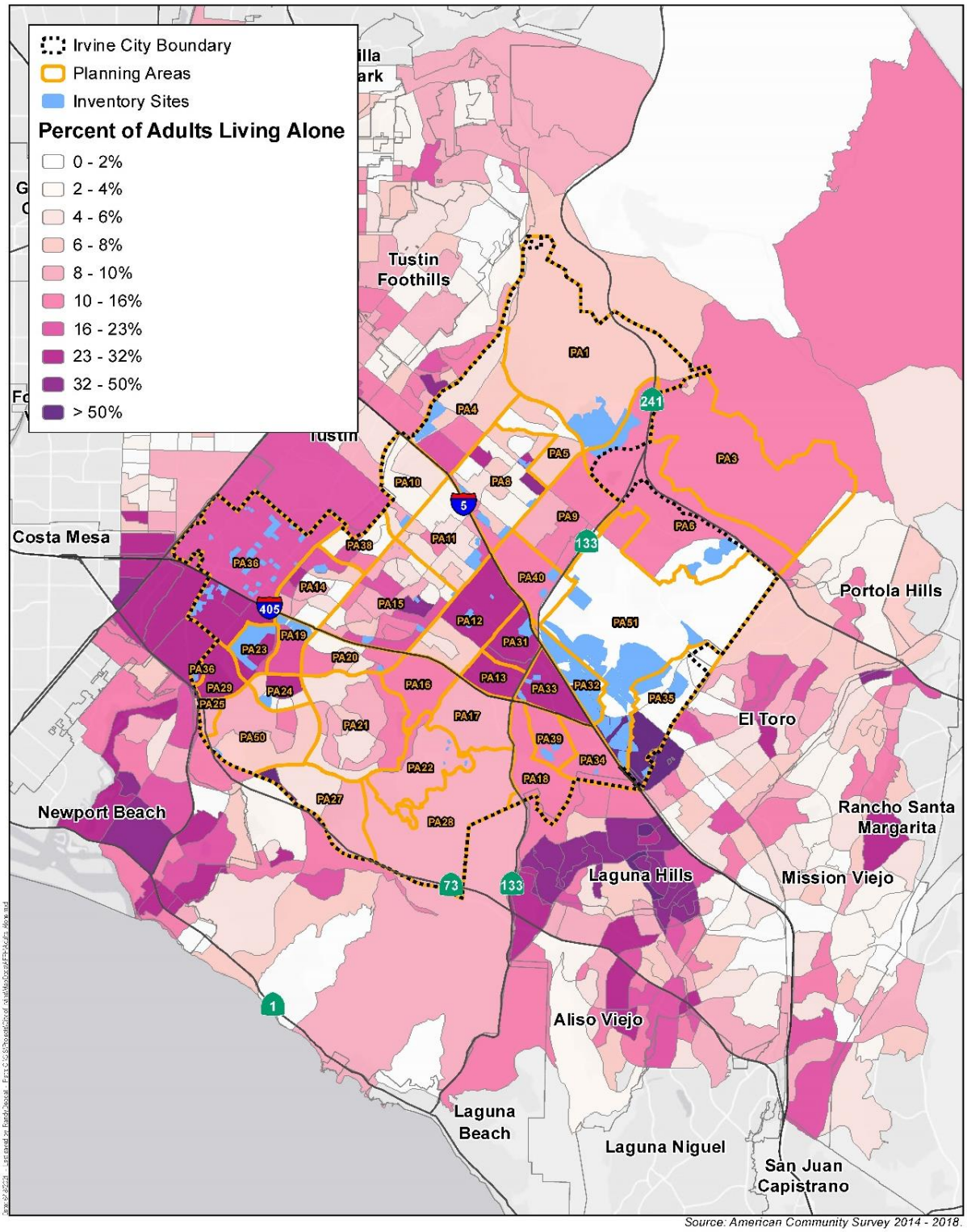


Figure B-12. Percent of Children in Married-Couple Families Map

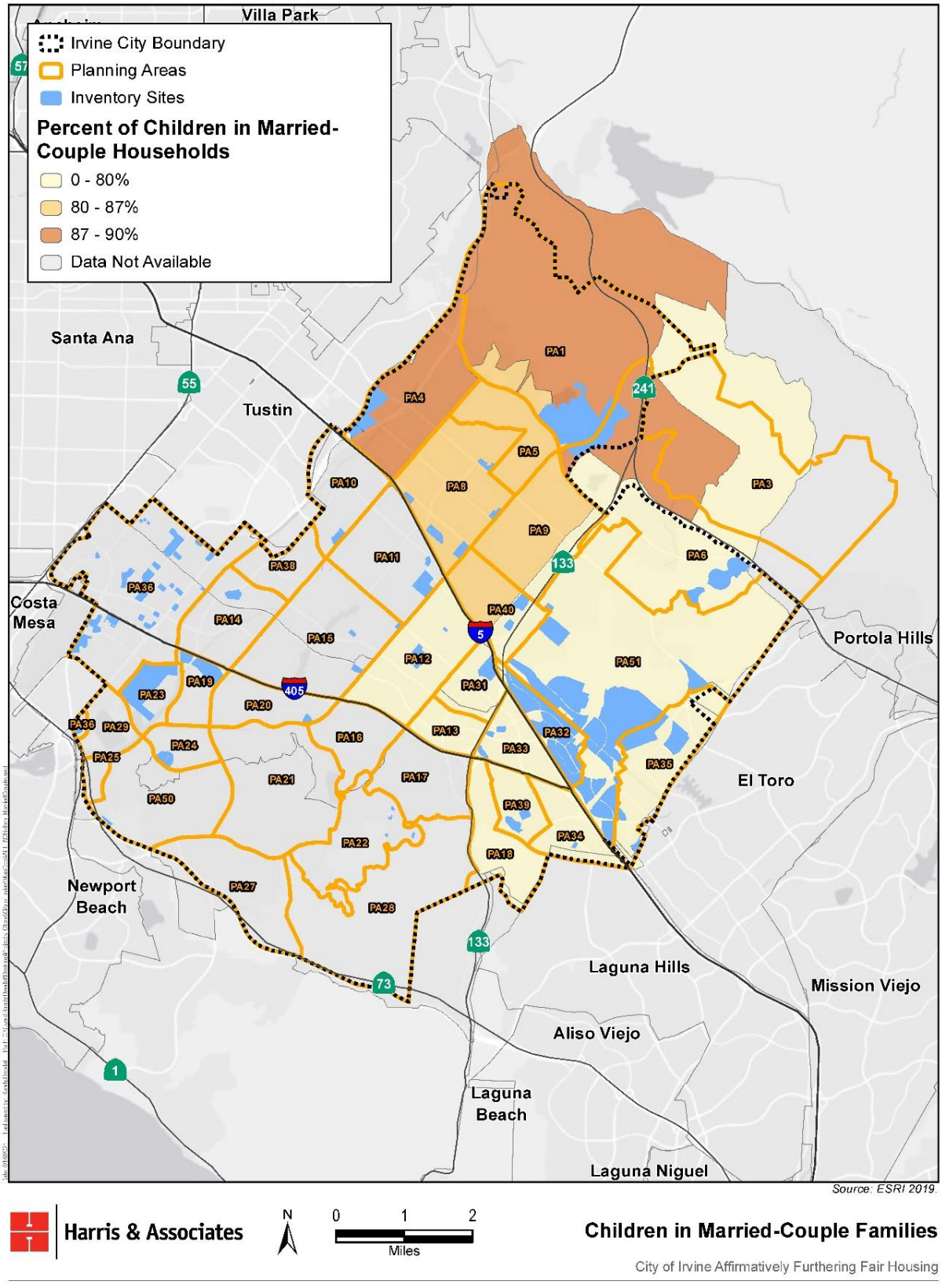


Figure B-13. Percent of Children in Single Female-Headed Households Map

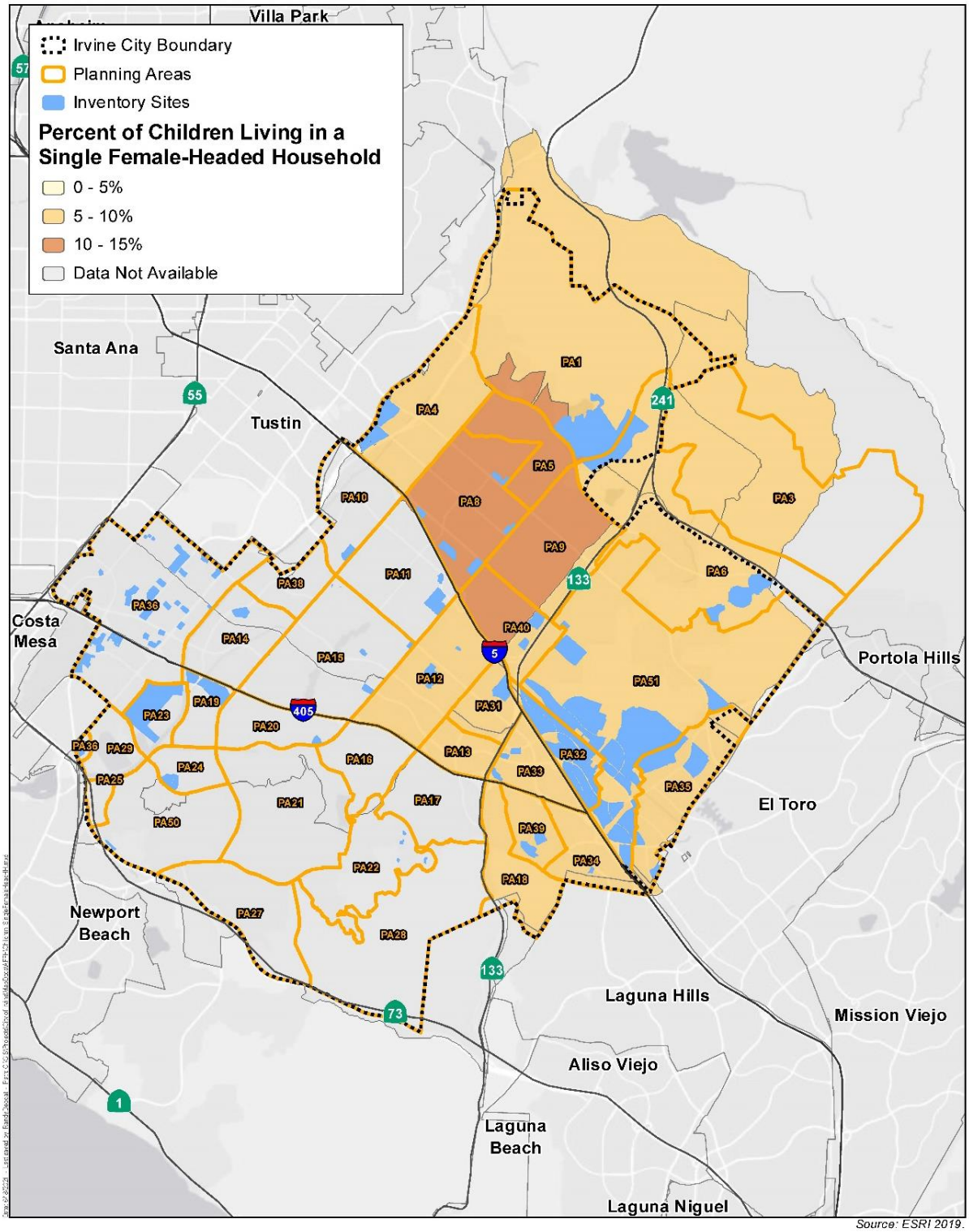


Figure B-14. Transit Proximity Map

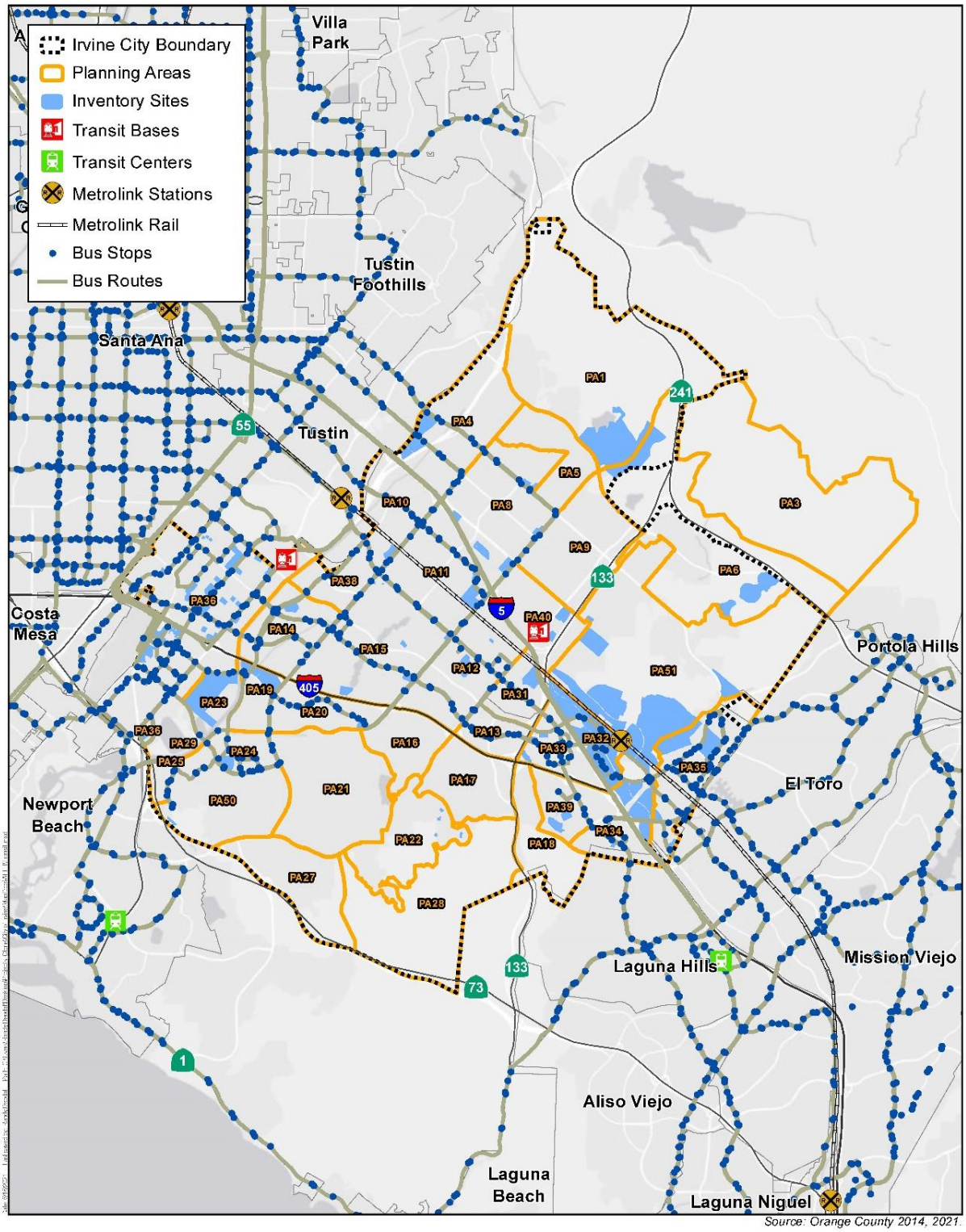


Figure B-15. Jobs Proximity Map

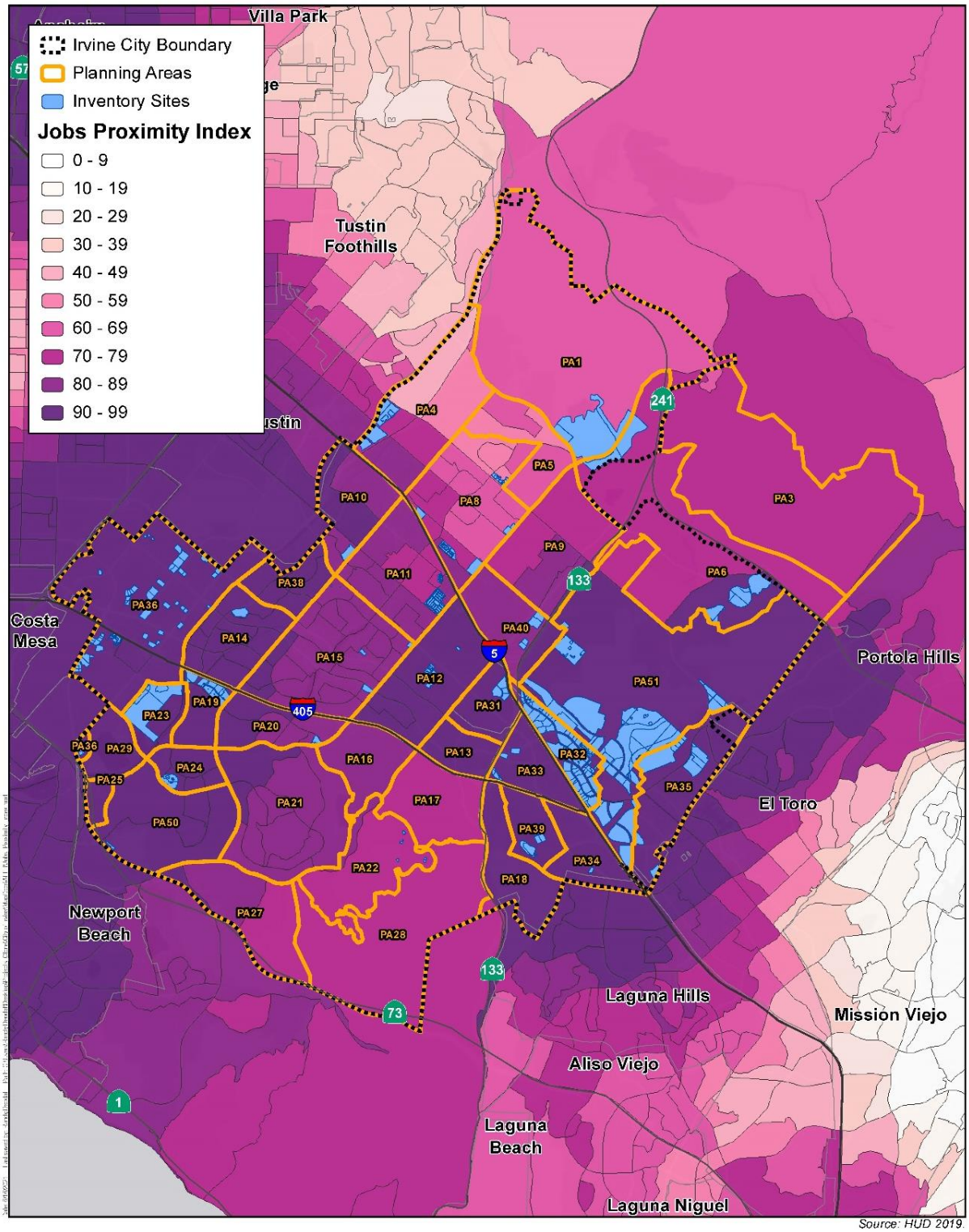


Figure B-16. Schools Proximity Map

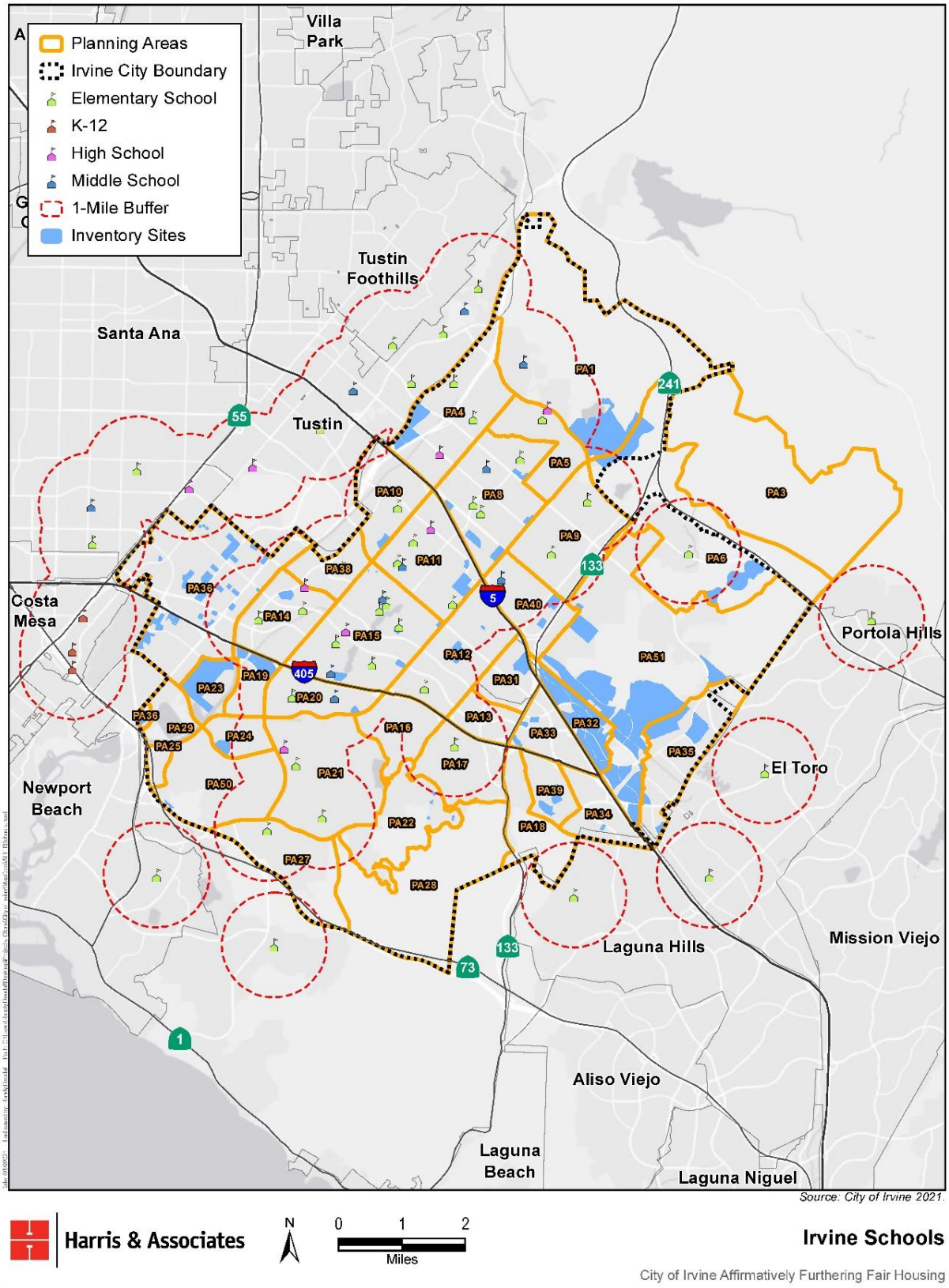


Figure B-17. Percent of People with Disabilities Regional Map

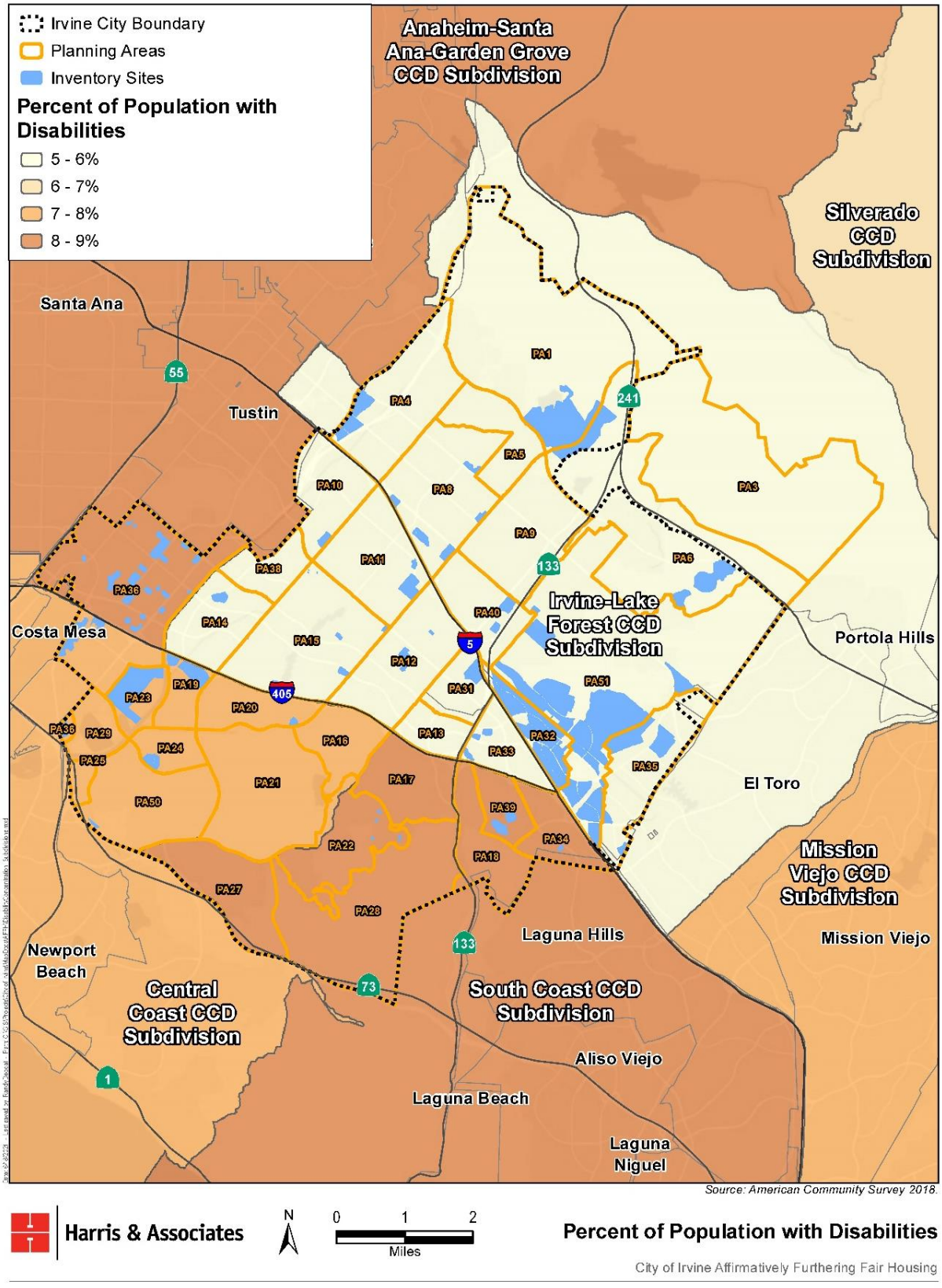


Figure B-18. Percent of People with Disabilities Local Map

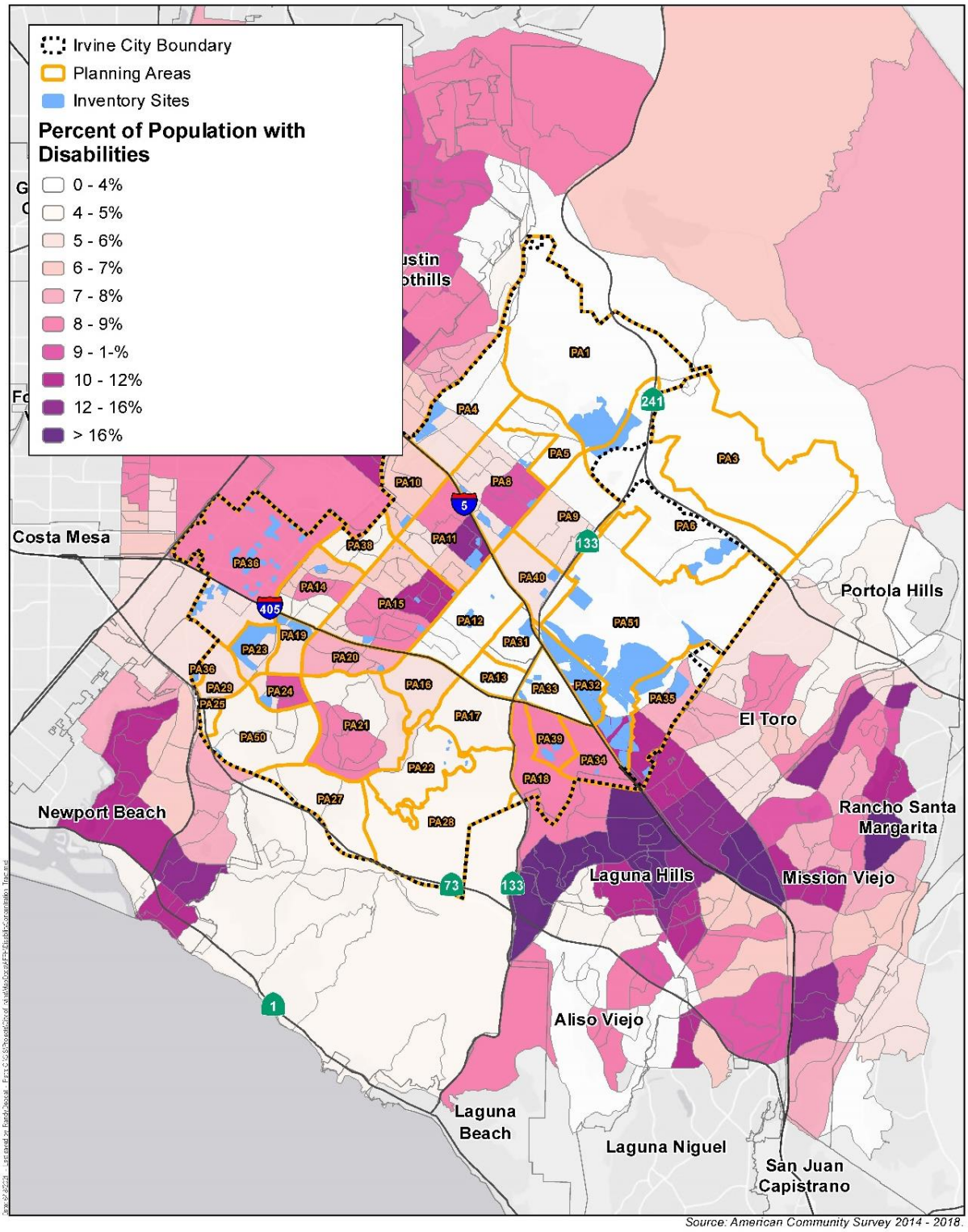


Figure B-19. Renter Cost Burden Map

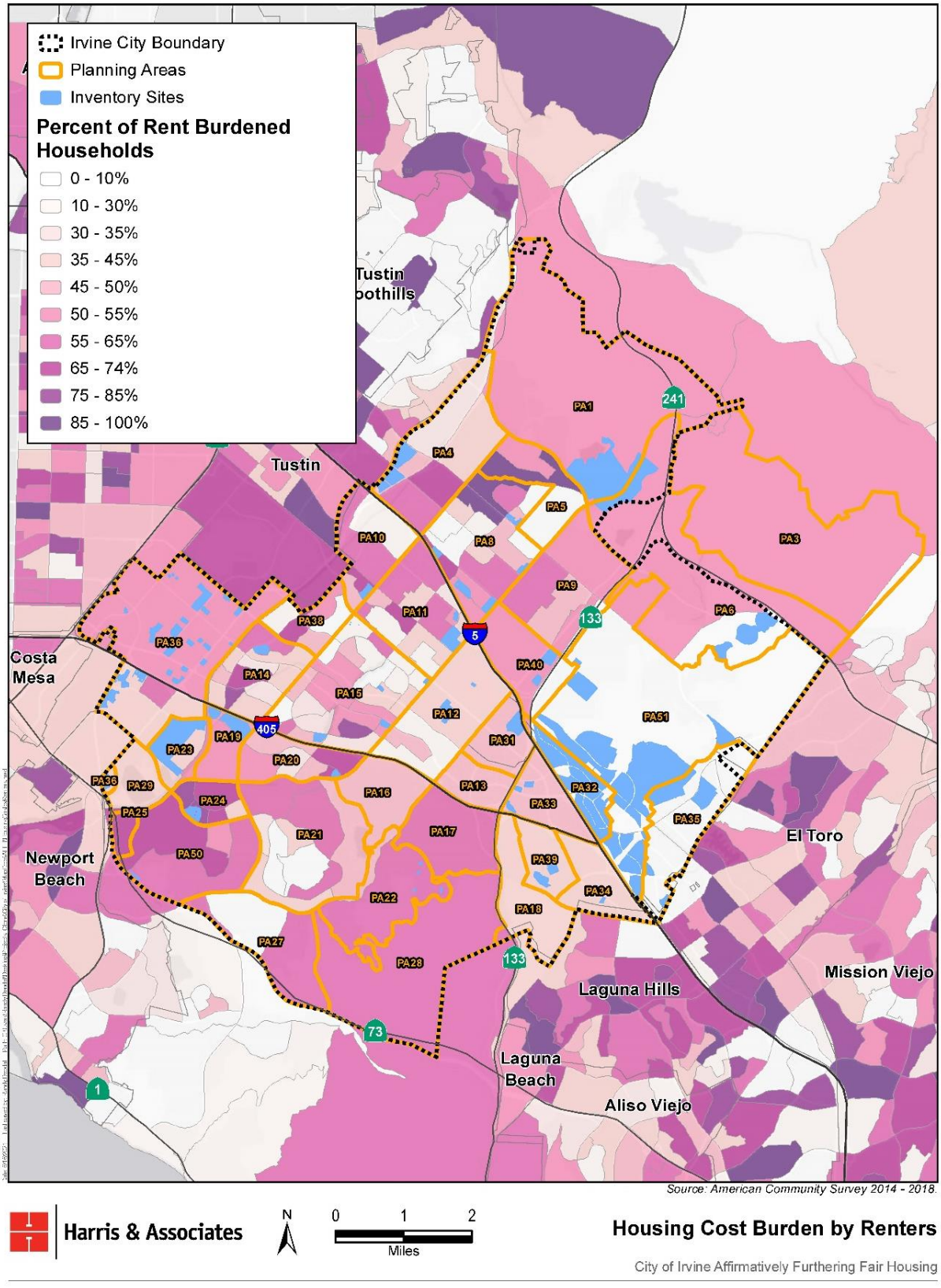


Figure B-20. Owner Cost Burden Map

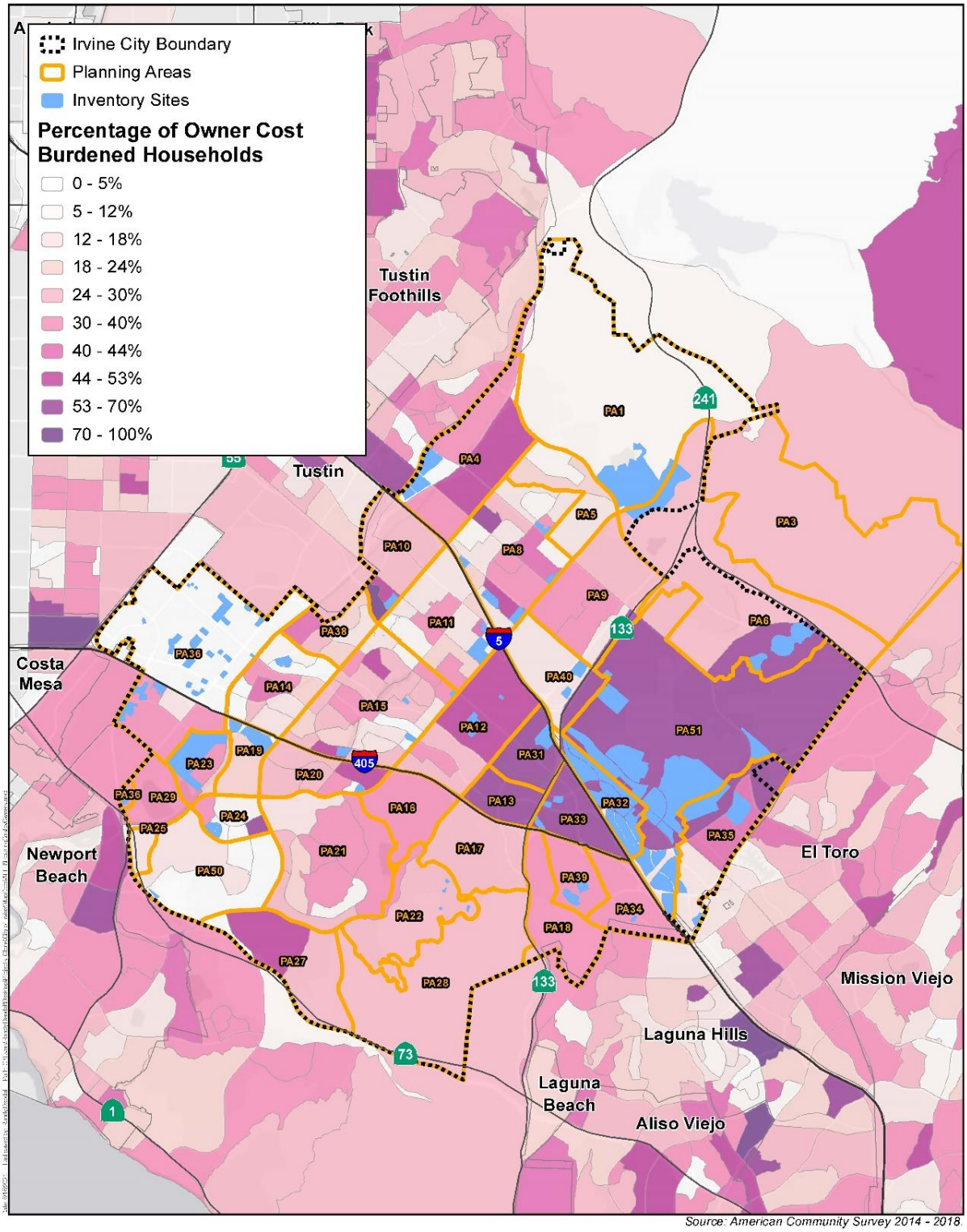
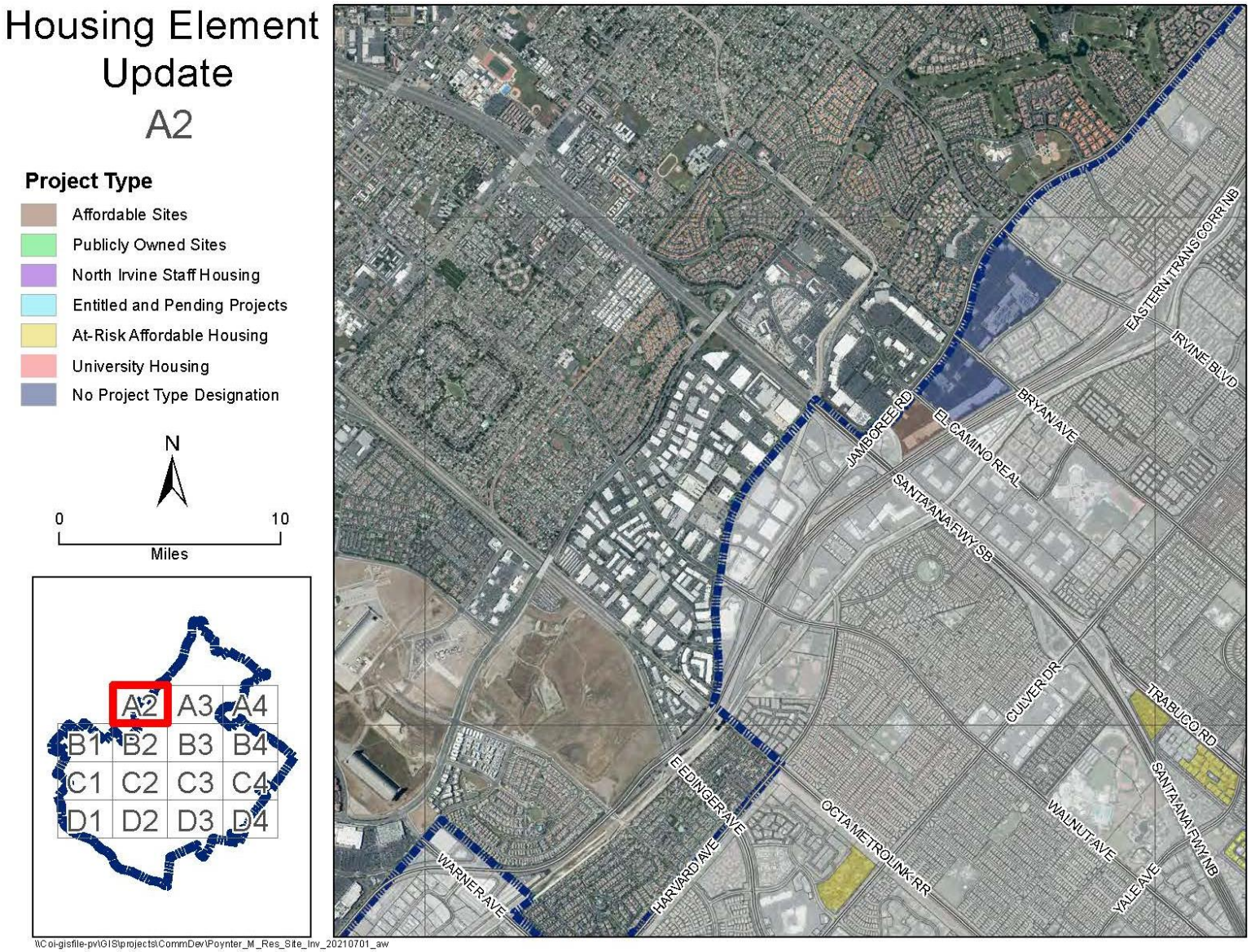
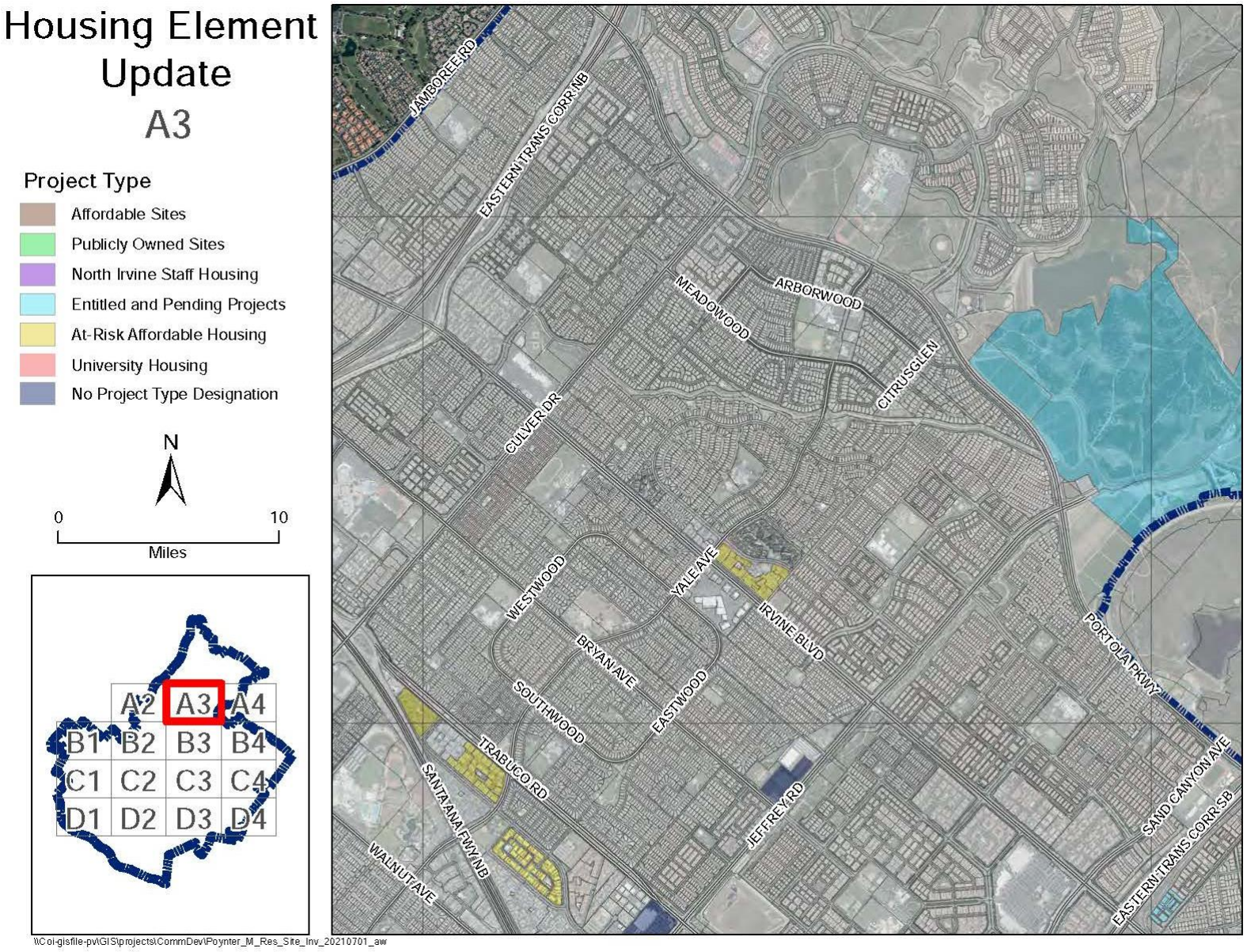


Figure B-21. Sites Inventory Map

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MEADOWOOD
ARBORWOOD
CITRUS GLEN
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IRVINE BLVD
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EASTWOOD
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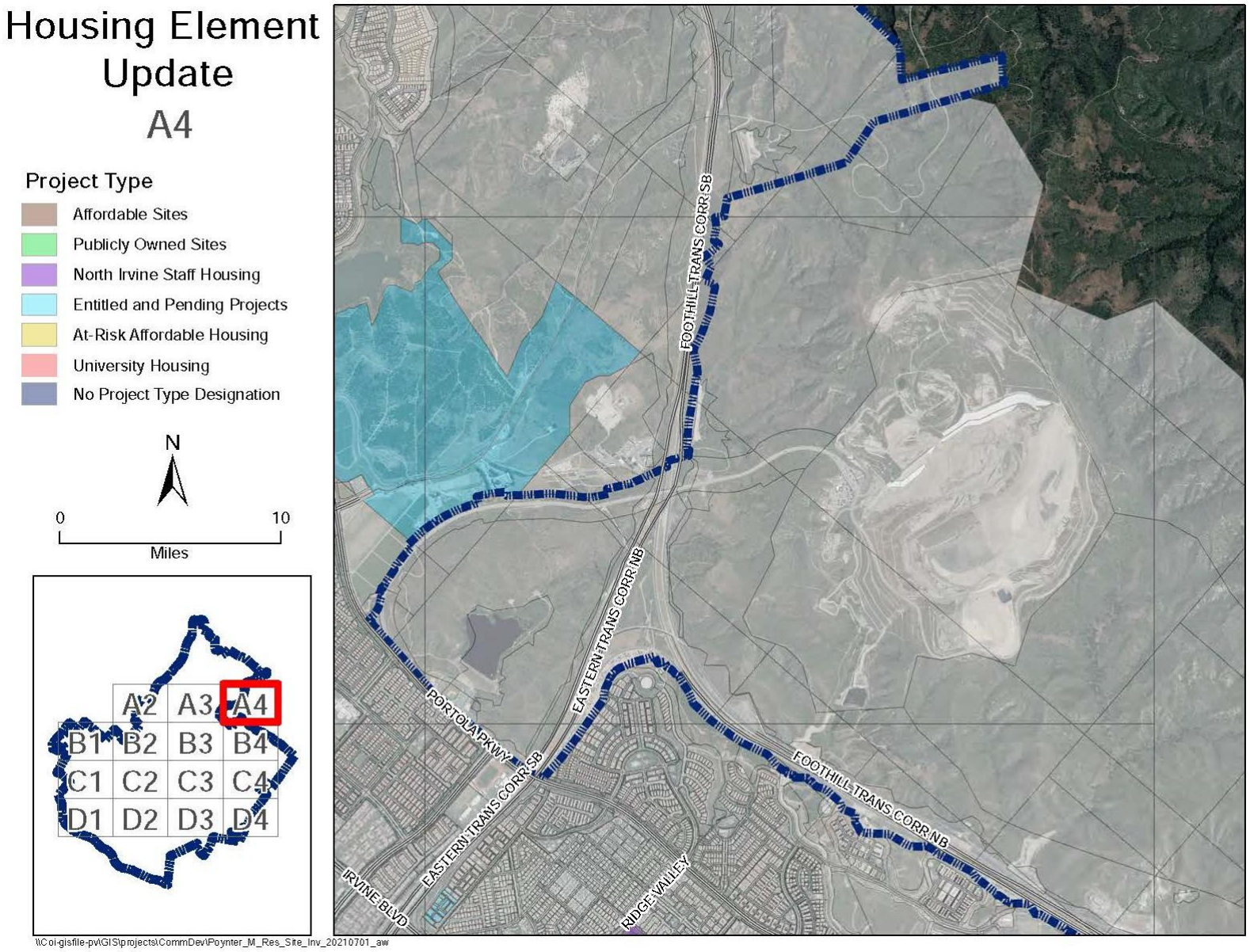
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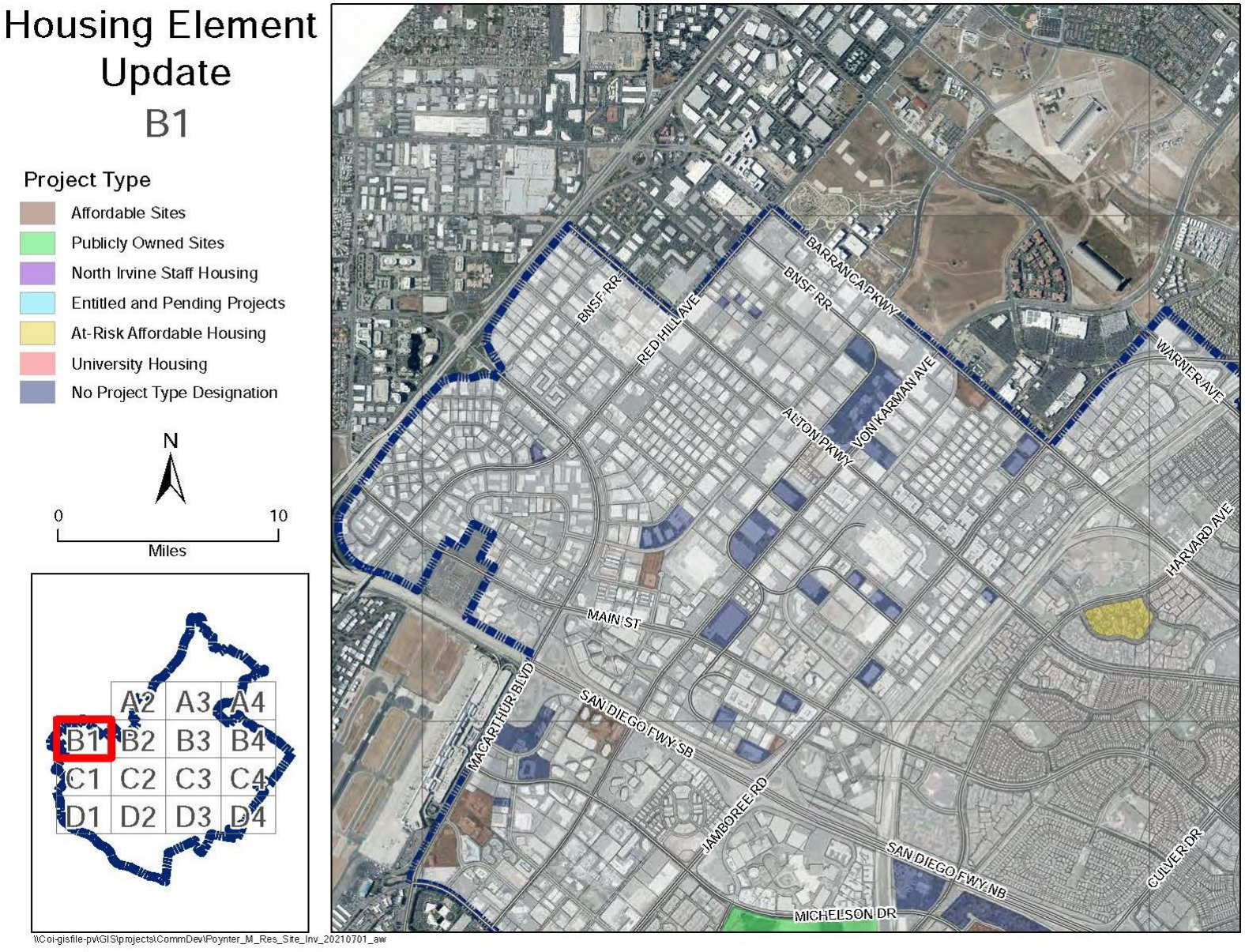
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BARRANCA PKWY
BNSF RR
WARNER AVE
ALTON PKWY
VON KARMAN AVE
HARVARD AVE
MAIN ST
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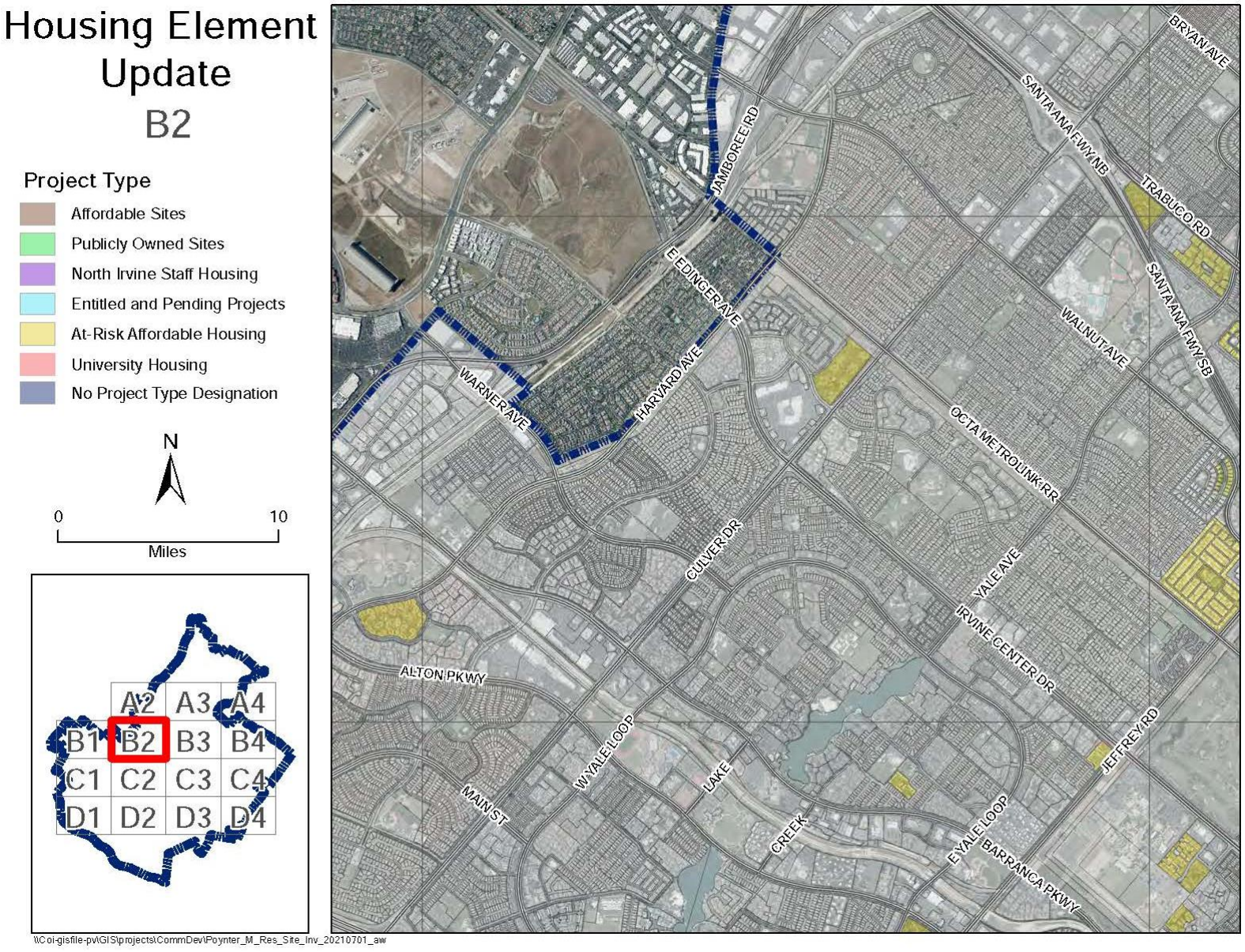
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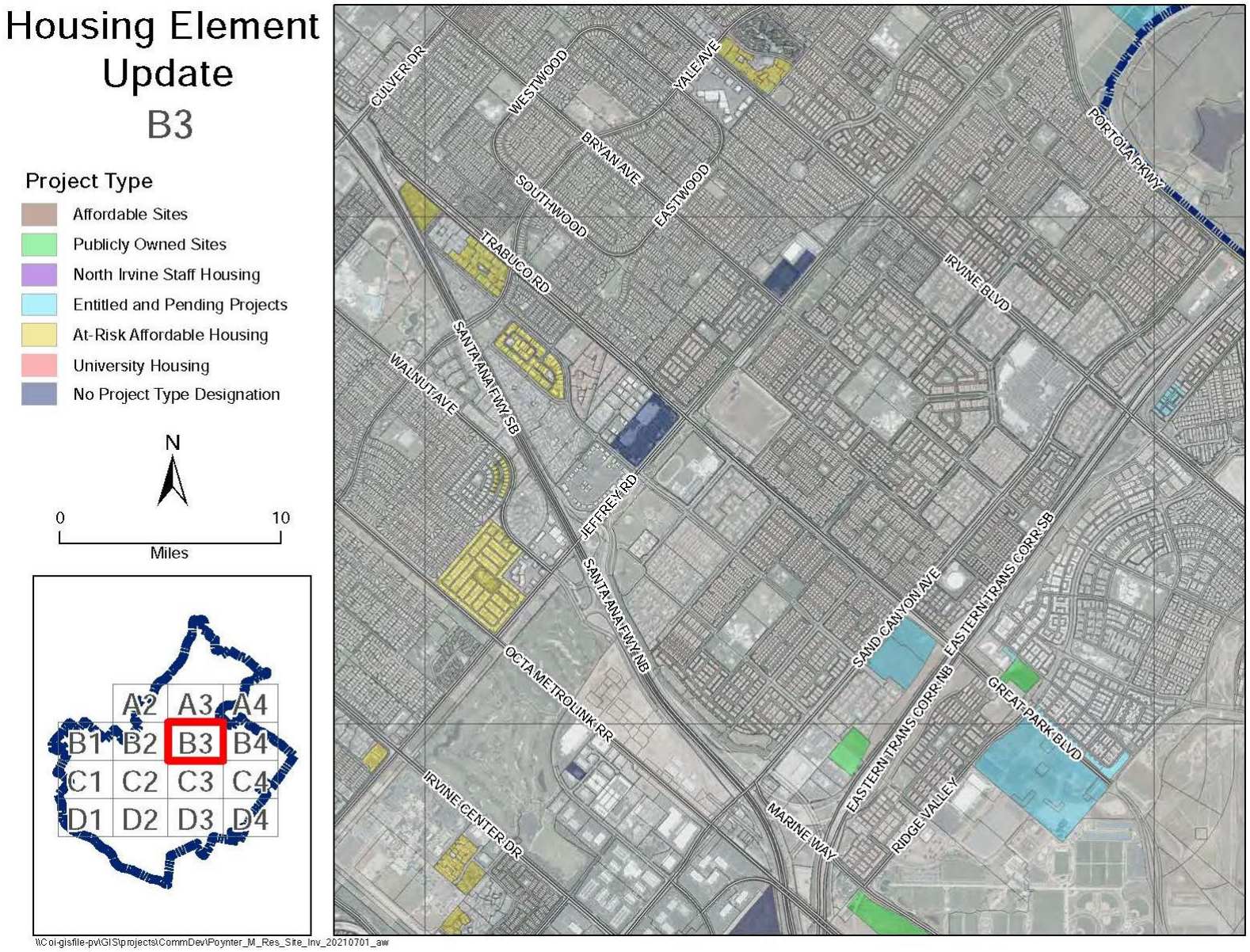
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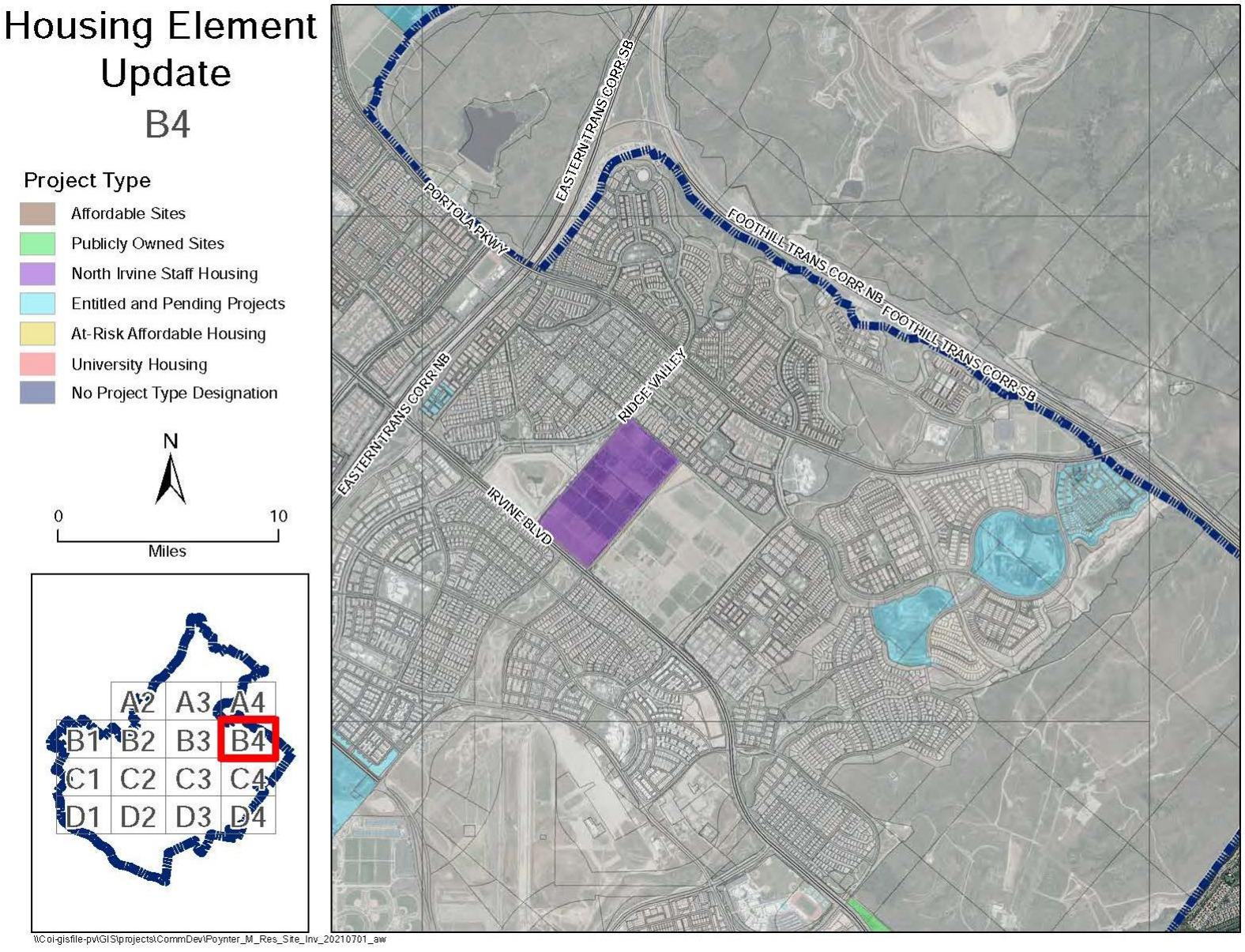
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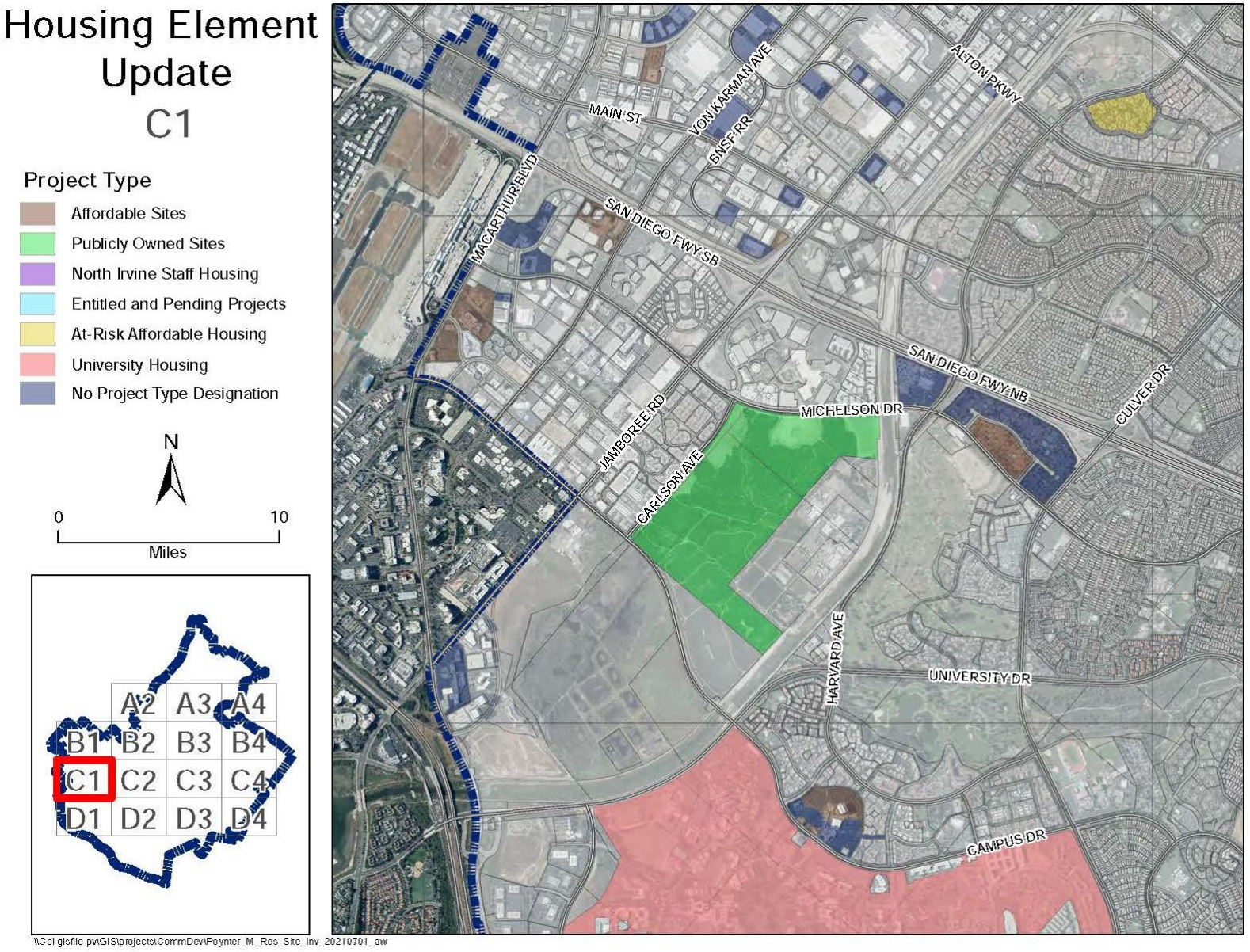
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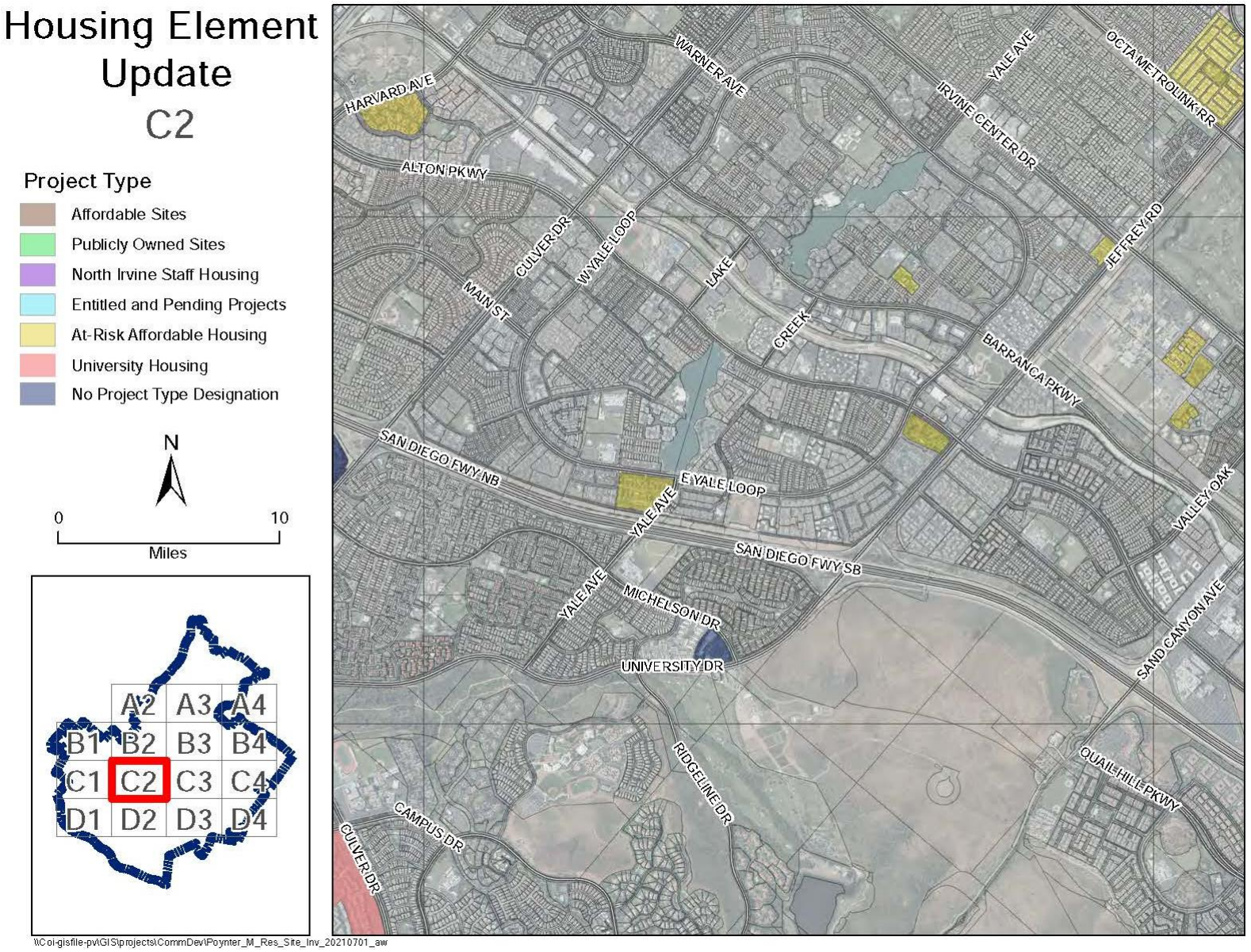
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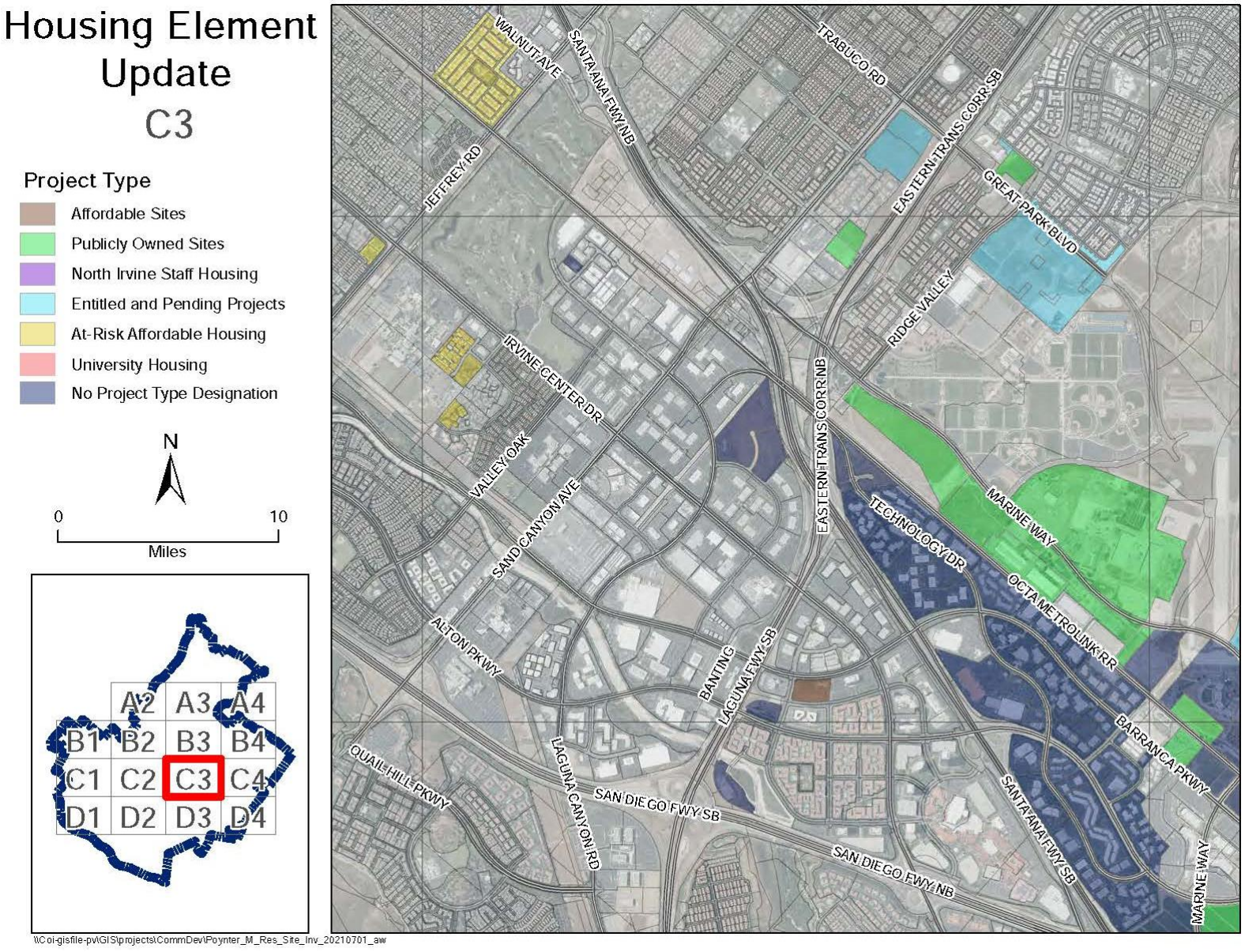
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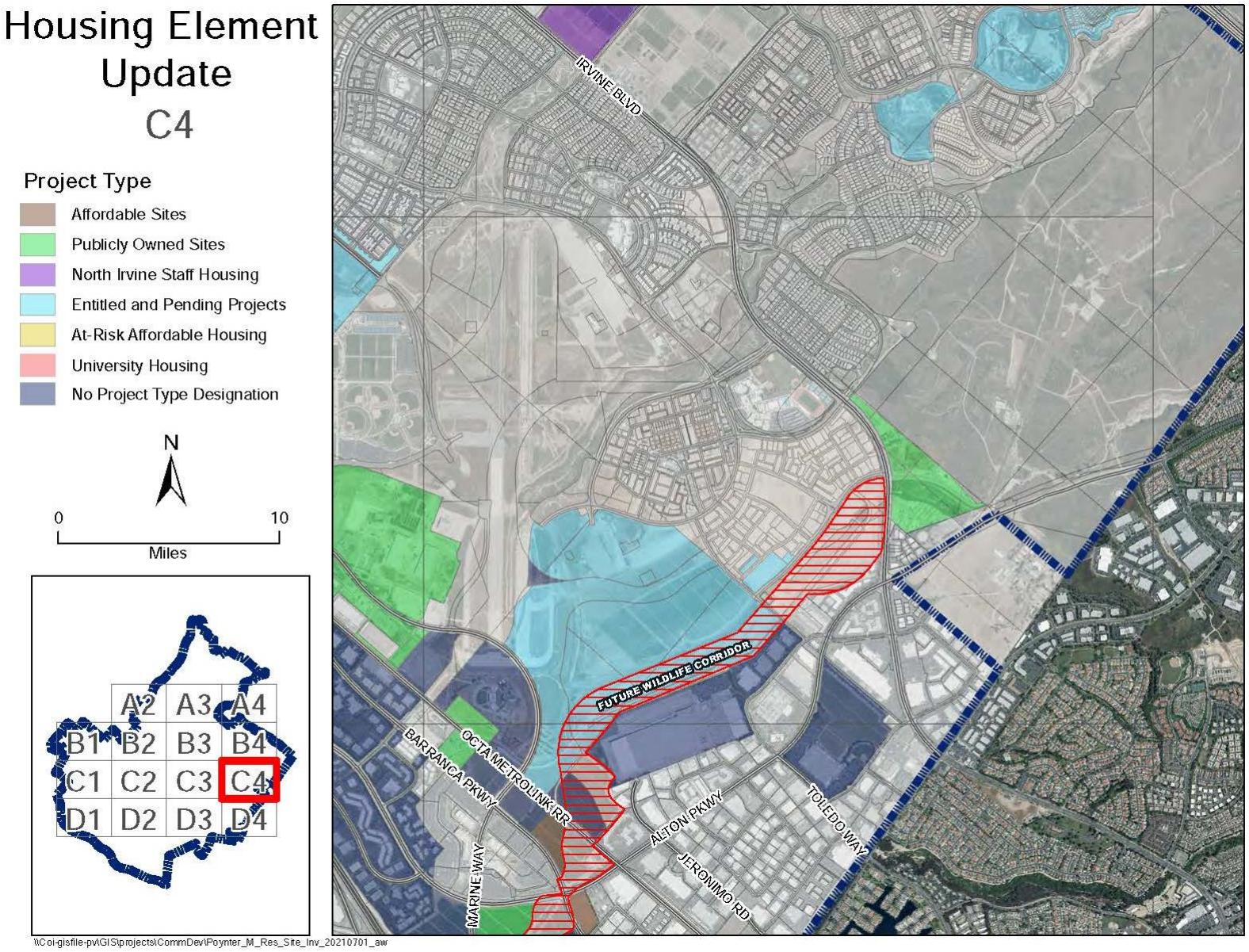
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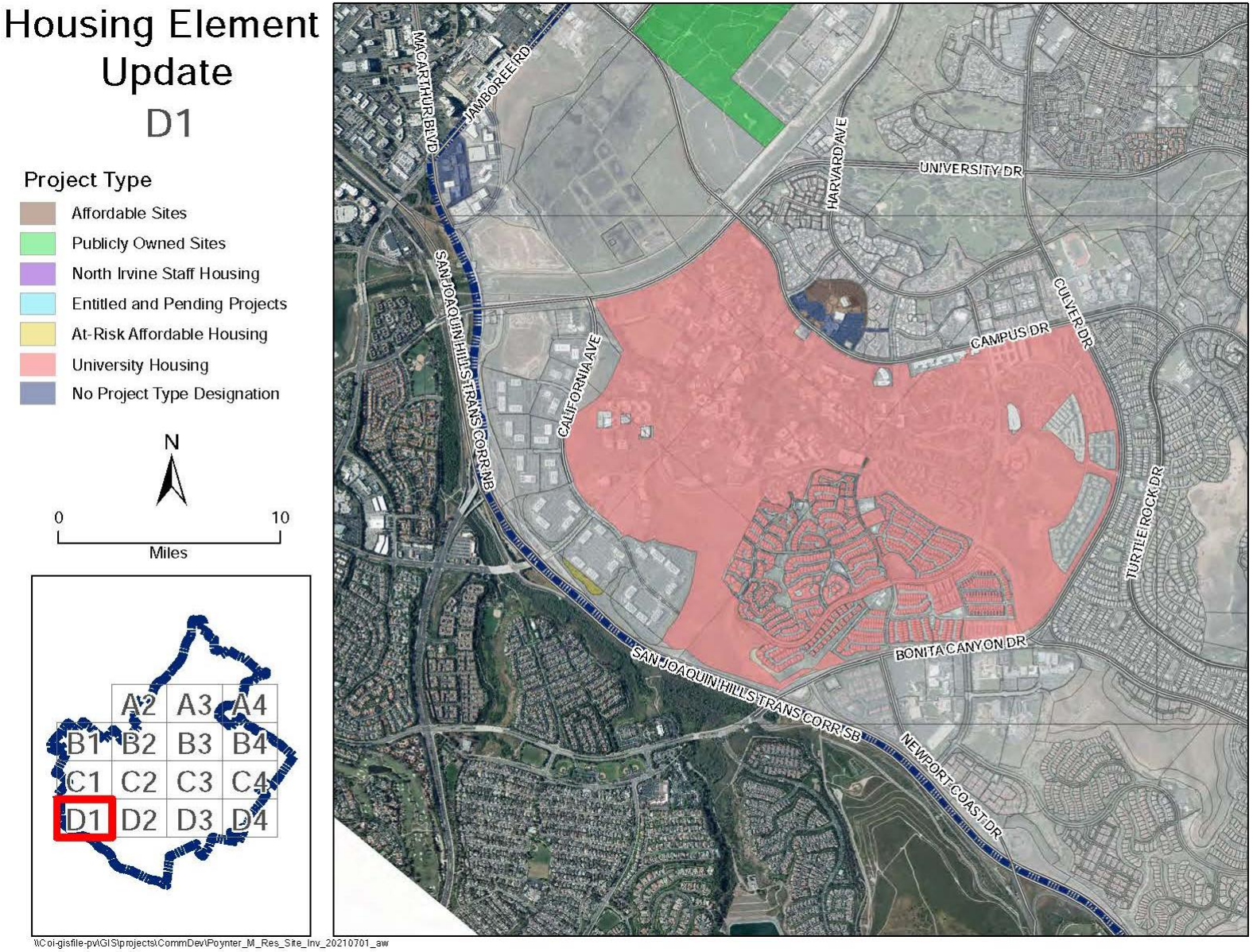
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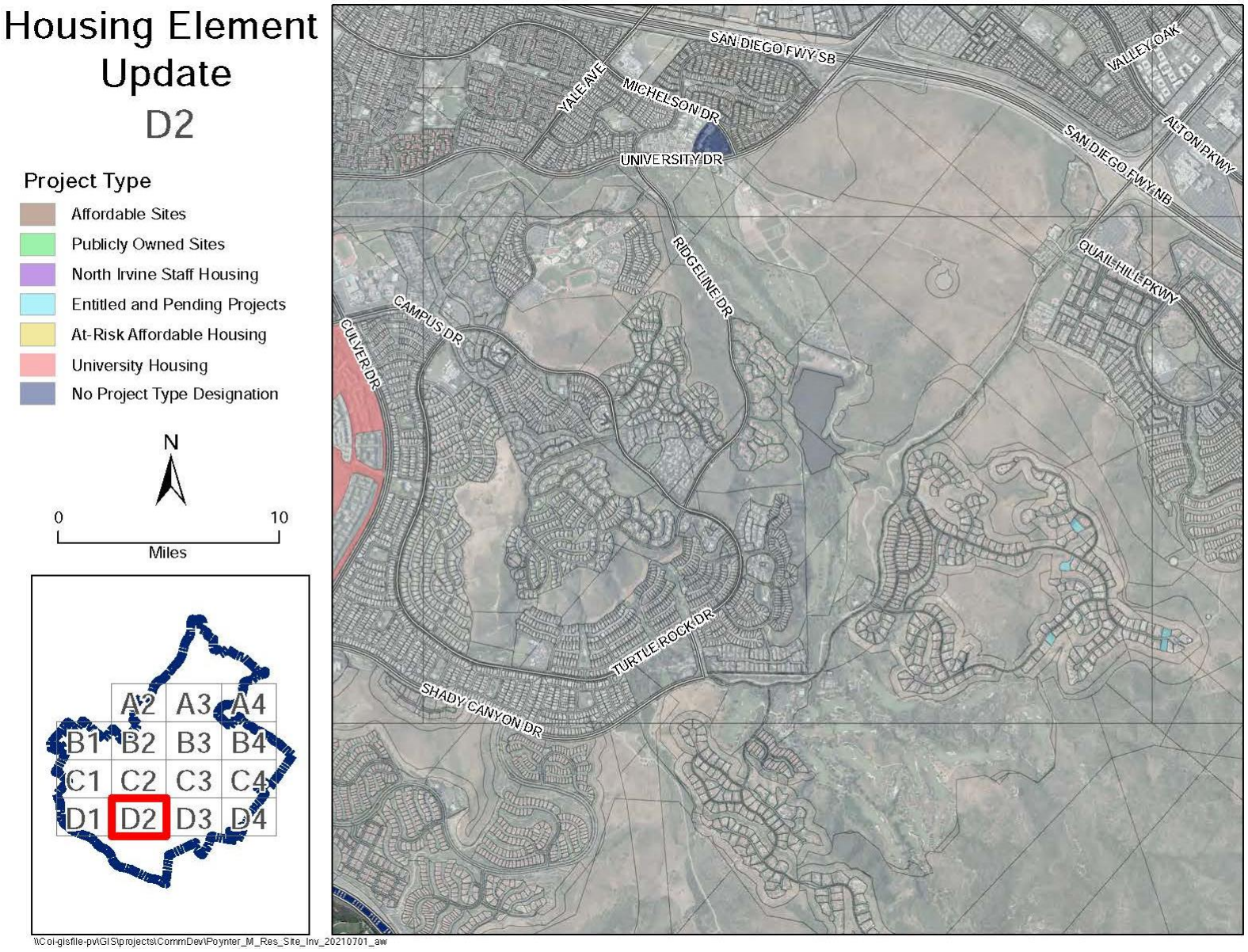
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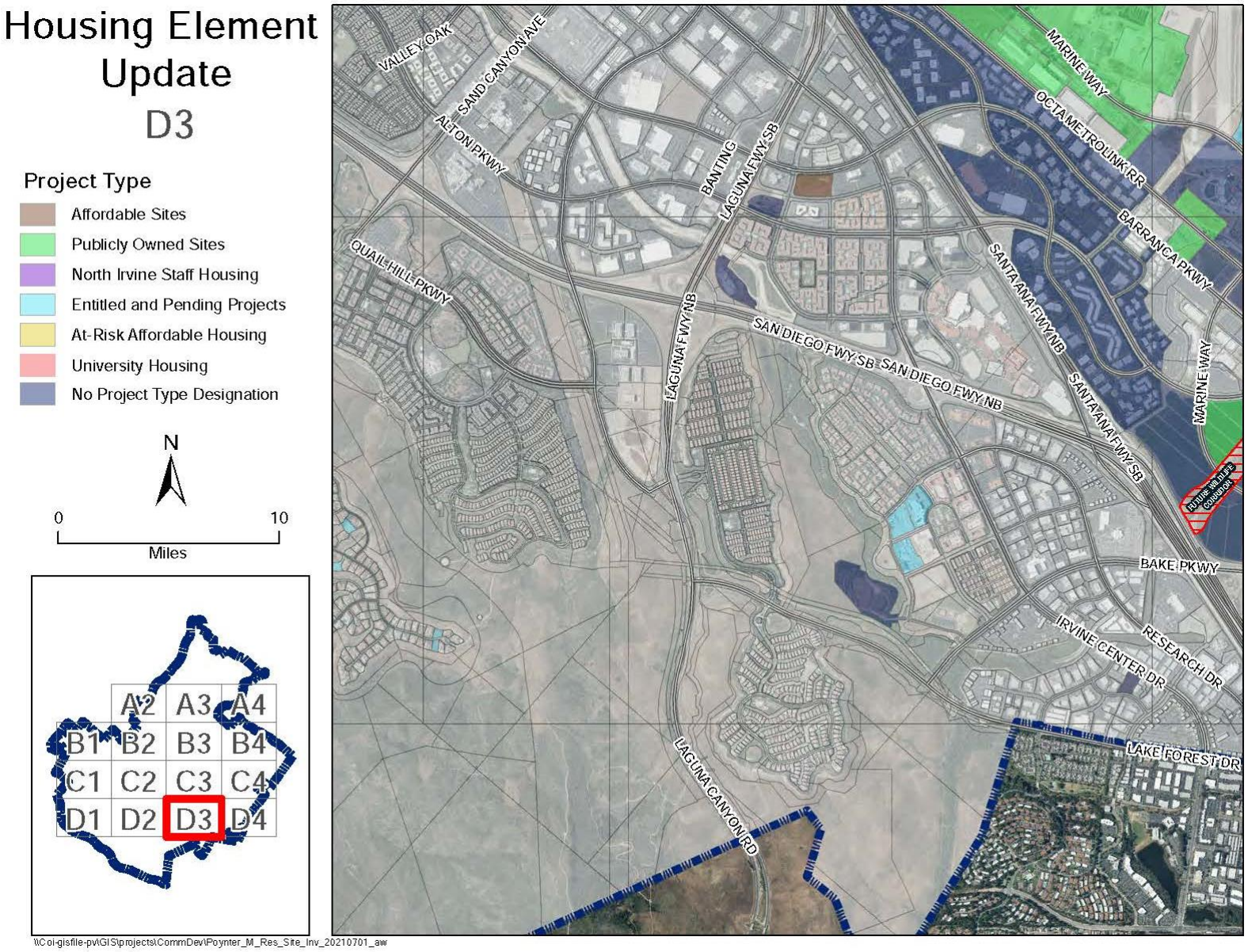
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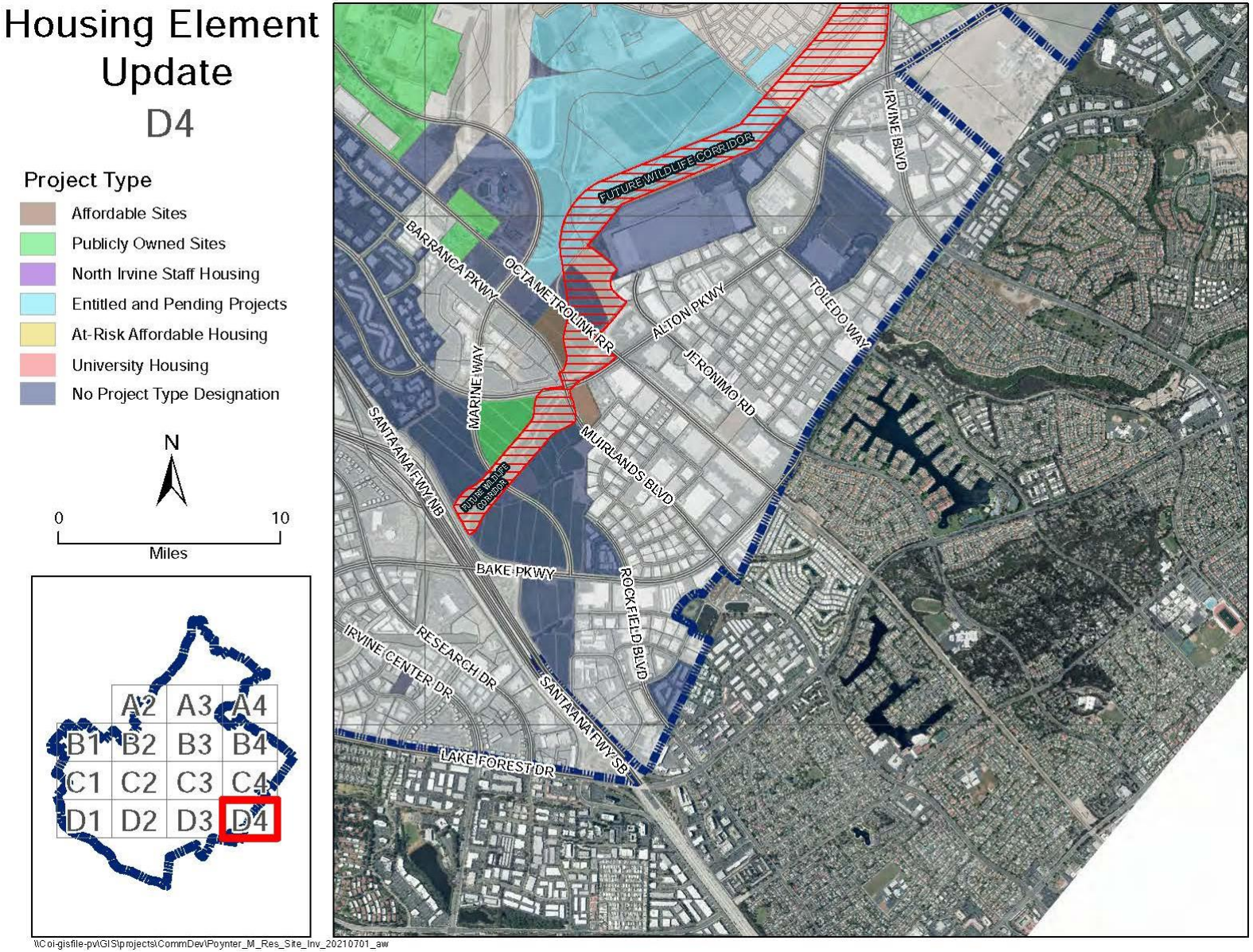
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