



ORANGE COUNTY FAIR HOUSING PLAN 2010-2015

- **REGIONAL ANALYSIS OF
IMPEDIMENTS TO
FAIR HOUSING CHOICE**
- **FAIR HOUSING ACTION PLAN**

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Section 1

Introduction & Summary

SECTION 1

INTRODUCTION

A. AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH) CERTIFICATION

An Affirmatively Furthering Fair Housing (AFFH) certification is required of communities that administer the following U.S. Department of Housing and Urban Development (HUD) Community Planning and Development (CPD) programs:

- Community Development Block Grants (CDBG)
- Home Investments Partnership Program (HOME)
- Emergency Shelter Grants (ESG)
- Housing Opportunities for People with AIDS Program (HOPWA)

The AFFH certification states that the community receiving HUD funds:

“...will affirmatively further fair housing ... by conducting an analysis to identify impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of any impediments identified through the analysis, and maintaining records reflecting the analysis and actions in this regard.”

The certification is included in the Consolidated Plans and Action Plans that are submitted to HUD by Orange County's Entitlement Cities and the Urban County Program.

HUD interprets the board objectives of the AFFH obligation to mean:

- Analyze and eliminate housing discrimination in the jurisdiction.
- Promote fair housing choice for all persons.
- Provide opportunities for inclusive patterns of occupancy regardless of race, color, religion, sex, familial status, disability and national origin.
- Promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities.
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.

The first requirement of the AFFH certification is satisfied by the following:

- Conducting an analysis of impediments to fair housing choice. This is commonly called the AI.
- Identify appropriate actions to overcome the effects of identified impediments. This is accomplished through preparation of a fair housing action plan.

It is the responsibility of the Entitlement Cities and Urban County Program to “take” the actions identified in the fair housing action plan and to “maintain records on the actions taken”.

HUD's Consolidated Plan Review Guidance (i.e., Checklist) explains that the following guidance should be used by HUD CPD representatives to determine if the Certification is *not* satisfactory:

- Disregard of regulatory requirements to conduct an analysis of impediments to fair housing choice, take appropriate actions to address identified impediments, or maintain adequate records on the steps taken to affirmatively further fair housing in the jurisdiction.
- Lack of action taken on outstanding findings regarding performance under affirmatively furthering fair housing certification requirements of the Consolidated Plan or the Community Development Block Grant Program.

More specifically, HUD has issued the following guidance:

HUD can require the submission of an AI in the event of a complaint or as part of routine monitoring. If, after reviewing all documents and data, HUD concludes that

- (1) the jurisdiction does not have an AI;
- (2) an AI was substantially incomplete;
- (3) no actions were taken to address identified impediments;
- (4) the actions taken to address identified impediments were plainly inappropriate; or
- (5) the jurisdiction has no records

the Department would notify the jurisdiction that it believes the certification to be inaccurate, or, in the case of certifications applicable to the CDBG program, the certification is not satisfactory to the Secretary.

Source: Memorandum from Nelson R. Bregon, General Deputy Assistant Secretary for Community Planning and Development to CPD Office Directors, FHEO HUB Directors, FHEO Program Center Directors and FHEO Equal Opportunity Specialists, September 2, 2004, page 2

HUD also has stated:

Rejection of the certification provides the basis for HUD to disapprove the jurisdiction's Consolidated Plan.

Source: U.S. Department of Housing and Urban Development, Office of Community Planning and Development, *Fair Housing for HOME Participants*, May 2005, page 1

The way HUD determines compliance with the AFFH Certification is through a review of each entitlement city's and the Urban County's Consolidated Plan Annual Performance and Evaluation Report (CAPER). In the CAPER, the entitlement city and Urban County submit a narrative statement on actions taken to affirmatively further fair housing during the prior program year (July 1 to June 30).

HUD has issued the following guidance:

Once the jurisdiction completes the AI, it must report on its implementation by summarizing the impediments identified in the analysis and describing the actions taken to overcome the effects of the impediments identified through the analysis in its Consolidated Annual Performance and Evaluation Report (CAPER). Although AIs are not submitted or approved by HUD, each jurisdiction should maintain its AI and update

the AI annually where necessary. Jurisdictions may also include actions the jurisdiction plans to take to overcome the effects of impediments to fair housing choice during the coming year in the Annual Plan that is submitted as part of the Consolidated Plan submission.

Source: Memorandum from Nelson R. Bregon, General Deputy Assistant Secretary for Community Planning and Development to CPD Office Directors, FHEO HUB Directors, FHEO Program Center Directors and FHEO Equal Opportunity Specialists, September 2, 2004, page 2

B. MEANING AND SCOPE OF FAIR HOUSING IMPEDIMENTS

What is an impediment? According to HUD, impediments are --

*Any actions, omissions, or decisions taken **because of** race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices. (Intent)*

*Any actions, omissions, or decisions which **have the effect** of restricting housing choices or the availability of housing choices **because of** race, color, religion, sex, disability, familial status, or national origin. (Effect)*

A lack of affordable housing in and of itself, HUD has pointed out, is not an impediment to fair housing choice, unless it creates an impediment to housing choice *because of* membership in a protected class.

Impediments may exist due to one or more of the following:

- Saying or doing something openly discriminatory.
- Treating some people differently than others because of their protected class.
- A policy that on its face seems neutral, but has a disparate impact on members of a protected class.

There are two types of impediments – private and public impediments. The nature and scope of private sector impediments are essentially actions or practices that are prohibited by the following fair housing laws:

- 1968 Federal Fair Housing Act
- 1974 Federal Equal Credit Opportunity Act
- 1980 State Fair Employment and Housing Act
- 1959 Unruh Civil Rights Act
- 1977 Housing Financial Discrimination Act

These laws prohibit housing discrimination, discriminatory advertising, blockbusting, steering, denial of reasonable accommodations, redlining, and other unlawful practices.

California's Fair Employment and Housing Act states it is unlawful:

To discriminate through *public* or private *land use practices, decisions, and authorizations* because of race, color, religion, sex, sexual orientation, familial status, marital status, disability, national origin, source of income, or ancestry. Discrimination includes, but is not limited to, restrictive covenants, *zoning laws, denials of use permits, and other actions authorized under the Planning and Zoning Law* (Title 7 (commencing with Section 65000)), that make housing opportunities unavailable.

Examples of public sector impediments include a definition of "family" inconsistent with fair housing laws, conditional use permit requirements for housing for the disabled, and the lack of a reasonable accommodation procedure.

C. PARTICIPANTS IN THE REGIONAL AI

The lead agency for preparation of the *Regional AI* is the Fair Housing Council of Orange County (FHCOC). Under contract to 15 Entitlement Cities and the Urban County Program, FHCOC provides fair housing services and tenant/landlord counseling services to the residents of Orange County. The FHCOC - a nonprofit organization - has been serving Orange County residents since 1965. The FHCOC also was the lead agency for the preparation of the 2000-2005 and 2005-2010 *Regional AIs*.

The key rationale for preparation of a *Regional AI* is that *private sector* impediments are regional in nature and affect multiple communities – that is, they are not limited to a single jurisdiction responsible for AFFH. During HUD's Affirmatively Furthering Fair Housing webcast on July 22, 2009 several participants supported the concept of addressing the AFFH certification through a regional approach, although specific models were not discussed during the webcast.

The FHCOC has a wealth of experience in dealing with fair housing impediments that occur in the private sector. HUD guidance indicates that the *Regional AI* must describe appropriate actions to overcome the effects of the private sector impediments that are identified through the analysis. The FHCOC understands the private sector and is well equipped to analyze impediments, describe appropriate actions, and to follow-through on those actions.

The *Regional AI* also identifies the *public sector* impediments to fair housing choice and describes the actions that participating cities and the Urban County will take to reduce and ameliorate these impediments. Some of the public impediments were first identified in 2008 and 2009 in the housing element updates of each jurisdiction. According to State law, each jurisdiction must adopt a housing element as part of its General Plan. A housing element must analyze constraints on housing for disabled persons and include a program for providing equal housing opportunity. The Entitlement Cities and the Urban County Program will continue to maintain records and report annually on the actions taken to overcome the public sector impediments.

The following jurisdictions participated in the preparation of the *Regional AI*:

Entitlement Cities

- Anaheim
- Buena Park
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach
- Irvine
- La Habra
- Lake Forest
- Newport Beach
- Orange
- Rancho Santa Margarita
- Santa Ana
- Westminster

Urban County

- Unincorporated County Target Areas, Urban County Program
- Aliso Viejo
- Brea
- Cypress
- Dana Point
- La Palma
- Laguna Beach
- Laguna Hills
- Laguna Woods
- Los Alamitos
- Placentia
- Seal Beach
- Stanton
- Villa Park
- Yorba Linda

Non-Participating Jurisdictions

- Costa Mesa
- Laguna Niguel
- Mission Viejo
- San Clemente
- San Juan Capistrano
- Tustin

The scope of work for the *Regional AI* was developed by the FHCOC in coordination with the Los Angeles Office of the U.S. Department of Housing and Urban Development (HUD-LA). HUD-LA and the FHCOC identified the types of private sector impediments that should be investigated in the *Regional AI*. The scope of work was developed in part with the

understanding that the FHCOC would take the lead for taking actions to ameliorate or eliminate the identified private sector impediments, given adequate support from participating jurisdictions.

Additionally, the scope of work incorporated the identification of public sector impediments by each city participating in the *Regional AI*. Each participating jurisdiction completed a survey of planning and zoning practices that may affect fair housing choices, particularly by disabled persons. The “Survey of Zoning and Planning Codes, Policies and Practices that May Pose an Impediment to Fair Housing Choice” was prepared by the FHCOC and approved by HUD-LA. Each jurisdiction participating in the *Regional AI* completed the 24 question survey and self identified planning and zoning impediments and the actions that would be taken to ameliorate and eliminate the impediments.

D. CITIZEN PARTICIPATION

HUD has stated that because fair housing planning is a component of the Consolidated Plan, the citizen participation requirements for the Consolidated Plan (24 CFR 91) applies to the preparation of the AI and Fair Housing Action Plan.

Source: U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, *Fair Housing Planning Guide*, Volume 1, March 1996, page 4-3

The major effort undertaken by the Fair Housing Council of Orange County to obtain citizen participation was the completion of a fair housing survey. The purpose of the survey was to obtain resident opinions on housing discrimination. Respondents, for instance, were asked whether they thought housing discrimination exists in Orange County and to give examples of discriminatory practices. Additionally, information was obtained on the characteristics of the respondents in order to compare them to those of Orange County's entire population.

The survey respondents differ from Orange County's population. For example, the percentage of respondents having families with children was much higher compared to the Orange County percentage. The disability rate among the survey respondents was twice as high as that of the Orange County population. And a lower percentage of respondents belonged to a minority population compared to the Orange County population characteristics. Table 1-1 on the next page shows the comparison data.

Overall, about 47% of the respondents believe there is housing discrimination in Orange County. A higher percentage (58%) of the minority population compared to the non-minority population (40%) believes there is housing discrimination in Orange County. Table 1-2 shows the responses to the question *Do you believe that there is housing discrimination in Orange County?*

Table 1-1
Regional Analysis of Fair Housing Impediments
Survey Comparison to 2009 American Community Survey

Question/Reponses	Survey Percentage	ACS Percentage
1. What is your family status? ¹		
Have Children	60.2%	37.6%
Do not have children	39.8%	62.4%
2. Does anyone in your household have a disability? ¹		
Yes	14.0%	7.3%
No	86.0%	92.7%
Minority Status ¹		
Yes	40.9%	54.7%
No	59.1%	45.3%
Tenure Status (Excluding Homeless) ¹		
Own	38.5%	60.1%
Rent	61.5%	38.5%

¹American Community Survey 1-Year Estimates 2009, Selected Social Characteristics, Selected Demographic Characteristics, and Selected Housing Characteristics

Table 1-2
Regional Analysis of Fair Housing Impediments
Resident Survey Results-Question #3 and #7 Cross Tab

Do you believe that there is housing discrimination in Orange County?				
Answer Options	Minority	Percent	Non-Minority	Percent
Yes	22	57.9%	22	40.0%
No	5	13.2%	11	20.0%
Unsure	11	28.9%	22	40.0%
Total	38	100.0%	55	100.0%

Table 1-3 shows the complete survey results. Among the key findings are:

- Half of the respondents stated they were “very well informed” or “somewhat informed” about housing discrimination.
- Almost 32% of the respondents stated they or someone they know has encountered housing discrimination.
- The two most common examples of housing discrimination cited by the respondents were “housing provider refuses to rent or deal with a person,” and “different terms and conditions”.
- Only 8% of those that believed they encountered housing discrimination reported the incident.
- However, almost 47% of the respondents stated they would report housing discrimination if they encountered it in the future.

The survey results indicate that a sizeable proportion of the population is “informed” about housing discrimination. Moreover, the general public recognizes examples of discriminatory practices. And in the future more people would report housing discrimination than they have in past. Although the number of survey responses is limited, it appears that a large share of the public are willing to report housing discrimination to agencies such as the Fair Housing Council of Orange County which indicates a continuing need for processing of discrimination complaints.

Table 1-3
Regional Analysis of Fair Housing Impediments
Fair Housing Survey Summary

Question/Responses	Response Percentage	Response Count	Answered Question	Skipped Question
1. What is your family status?			93	0
Have Children	60.2%	56		
Do not have children	39.8%	37		
2. Does anyone in your household have a disability?			93	0
Yes	14.0%	13		
No	86.0%	80		
3. The U.S. Census Bureau considers the following to be "minority groups": Black, Hispanic, Asian, Pacific Islander, or American India/Alaska Native. Are you a member of a minority group?			93	0
Yes	40.9%	38		
No	59.1%	55		
4. What type of housing do you currently have?			93	0
I own a home	37.6%	35		
I rent	60.2%	56		
I live in a hotel/motel	0.0%	0		
I am homeless	2.2%	2		
5. What is your income level?			93	0
High Income	9.6%	9		
Medium Income	45.2%	42		
Low Income	45.2%	42		
6. In which Orange County City do you live? (Top 5)			93	0
Anaheim	6.5%	6		
Fullerton	26.9%	25		
Garden Grove	15.1%	14		
Huntington Beach	15.1%	14		
Newport Beach	10.8%	10		
Subtotal	74.4%	69		
7. Do you believe there is housing discrimination in Orange County?			93	0
Yes	47.3%	44		
No	17.2%	16		
Unsure	35.5%	33		

Table 1-3 - continued
Orange County
Regional Fair Housing Impediments Analysis
Resident Survey Results

Question/Reponses	Response Percentage	Response Count	Answered Question	Skipped Question
8. Do you believe that there is housing discrimination in the Orange County city in which you currently/Previously reside?			93	0
Yes	34.4%	32		
No	28.0%	26		
Unsure	37.6%	35		
9. Have you or someone you know ever encountered any forms of housing discrimination described above? (Check all that apply)			64	29
Yes, I have	15.8%	12		
I think I may have	6.6%	5		
No, I have not	30.3%	23		
Yes, I know someone who has	15.8%	12		
I think I may know someone who has	2.6%	2		
No, I don't know someone who has	19.7%	15		
I don't know	9.2%	7	76 total responses	
10. (See examples above) If you believe or think that someone you know encountered housing discrimination, please check the type in the list at the beginning of this page. (Check all that apply).			64	29
A. Housing provider refuses to rent or deal with a person	20.0%	11		
B. Housing provider falsely denies that housing was available	10.9%	6		
C. Housing provider refuses to make reasonable accommodations for a tenant with one or more disabilities	10.9%	6		
D. Housing provider uses discriminatory advertising	10.9%	6		
E. Real estate agent refuses to sell or deal with a person	3.6%	2		
F. Real estate agent directs persons to certain neighborhoods	7.3%	4		
G. Housing mortgage lender discriminates by denying mortgage	7.3%	4		
H. Housing lender directs persons to certain neighborhoods	3.6%	2		
I. Different terms and conditions	18.2%	10		
Other (please specify)	7.3%	4		
N/A		30		55 examples were given by 34 respondents; N/A was stated by 30 respondents

Table 1-3 - continued
Orange County
Regional Fair Housing Impediments Analysis
Resident Survey Results

Question/Reponses	Response Percentage	Response Count	Answered Question	Skipped Question
11. If you believe you have encountered any form of housing discrimination in question #10 did you report it?			58	35
Yes	3.4%	2		
No	39.7%	23		
N/A	56.9%	33		
12. How well informed are you about housing discrimination			64	29
Very well informed	25.0%	16		
Somewhat informed	25.0%	16		
A little informed	21.9%	14		
Not informed at all	28.1%	18		
13. What would you do if you encountered housing discrimination?			64	29
Do nothing and seek other housing options	10.9%	7		
Tell the person that you believe they are discriminating	23.4%	15		
Report it	46.9%	30		
Would not know what to do	17.2%	11		
Other option	1.6%	1		
				Less than 100% due to rounding

E. REPORT FORMAT

Besides this Introduction, the Report includes the following Sections:

Section 2 – Fair Housing Progress Report: The prior *Analysis of Impediments to Fair Housing Choice* contained actions that would be taken during the 2005-2010 time period. Section 2 describes the actions taken during the past five years to eliminate or ameliorate the identified impediments.

Section 3 – Fair Housing Action Plan: This Section presents a new multi-year Fair Housing Action Plan. There are two impediment categories – public sector and private sector impediments. A summary description is given of each identified impediment. The actions the FHCOC plans to undertake to overcome the private sector impediments are described in the Fair Housing Action Plan. Additionally, actions to be taken by the Entitlement Cities and Urban County are described in Section 3. Finally, actions are described to address affirmatively furthering fair housing through the location of affordable housing.

Section 4 – Fair Housing Community Profile: This Section presents demographic information on housing and population characteristics, population growth in Orange County, the protected classes, and household income for different racial groups and Hispanic households.

Section 5 – Private Sector Fair Housing Analysis: This Section presents information on the following private sector impediments: housing discrimination, discriminatory advertising, blockbusting, denial of reasonable accommodations or modifications, hate crimes and unfair lending.

Section 6 - Public Sector Fair Housing Analysis: This Section summarizes the public sector impediments. These impediments were identified through a survey 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. The survey 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. 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.

Section 7 – AFFH Through the Location of Affordable Housing: A lack of affordable housing in and of itself, HUD has pointed out, is not an impediment to fair housing choice, unless it creates an impediment to housing choice *because of* membership in a protected class. However, recent court cases and recent events have demonstrated that the location of affordable housing is regarded as a means of AFFH. This Section presents information on the location of affordable and Section 8 housing in census tracts with a high and low percentage of minority populations. Additionally, the location of affordable and Section 8 housing is analyzed in terms of the income characteristics of the census tracts.

In addition, the AI contains seven Technical Appendices:

Technical Appendix A - Orange County Fair Housing Community Profile

Technical Appendix B - Minority Population by Census Tract

Technical Appendix C - Low Income Population by Census Tract and Block Group

Technical Appendix D - 2008 Home Mortgage Disclosure Act Data for Orange County

Technical Appendix E - Loan Denial Rates for Census Tracts with a High Number of Loan Applications

Technical Appendix F - FHA and Conventional Loan Denial Rates by City and Census Tract

Technical Appendix G – Completed Survey of Zoning and Planning Codes, Policies and Practices that May Pose an Impediment to Fair Housing Choice

F. PROTECTED CLASSES

The Federal and State fair housing laws prohibit discrimination against certain categories of people. These categories are referred to as “protected classes.” Attachment A provides definitions for the following protected classes:

Federal and State “Protected Classes”

- Race
- Color
- Sex
- National Origin
- Religion
- Familial Status
- Handicap/Disability

Additional State of California “Protected Classes”

- Sexual Orientation
- Marital Status
- Ancestry
- Source of Income
- Age

Attachment A

Fair Housing Protected Classes

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability). These categories of persons are “protected classes” under the provisions of the Fair Housing Act.

Race: The Fair Housing Act does not define race. Data on race is required for many federal programs and the Census Bureau collects race data in accordance with guidelines provided by the U.S. Office of Management and Budget (OMB) and these data are based on self-identification. The racial categories included in the census form generally reflect a *social definition* of race recognized in this country, and are not an attempt to define race biologically, anthropologically or genetically. In addition, the Census Bureau recognizes that the categories of the race item include both racial and *national origin* or socio-cultural groups. Census 2010 and the American Community Survey provide for six race categories: White; Black, African American or Negro; American Indian or Alaska Native; Asian; Native Hawaiian or Other Pacific Islander; and Some Other Race.

Color: The Fair Housing Act does not define color. However, it must refer to the complexion of a person's skin color or pigmentation. The 2010 racial categories can be traced to Statistical Policy Directive No.15, promulgated by the OMB on May 12, 1977. “The four racial categories stipulated in the (1977) directive parallel the classic nineteenth-century color designations of black, white, red (American Indian or Alaska native), and yellow (Asian or Pacific Islander); there is no brown race in the American ethnoracial taxonomy.” [Victoria Hattam, “Ethnicity & the Boundaries of Race: Re-reading Directive 15,” *Daedalus*, Winter 2005, page 63]

Sex: This basis refers to gender identity. California’s Fair Employment and Housing Act defines “sex” as including, but not limited to, pregnancy, childbirth, medical conditions related to pregnancy or childbirth and a person’s gender, as defined in Section 422.56 of the Penal Code. Government Code Section 12926(p)

National Origin: This basis refers to the real or perceived country of an individual’s birth, ancestry, language and/or customs.

Religion: According to the United States Department of Justice, this prohibition covers instances of overt discrimination against members of a particular religion as well as less direct actions, such as zoning ordinances designed to limit the use of private homes as places of worship.

Familial Status: According to Section 802(k) of the Fair Housing Act, as amended, means one or more individuals (who have not attained the age of 18 years) being domiciled with--

- (1) a parent or another person having legal custody of such individual or individuals; or
- (2) the designee of such parent or other person having such custody, with the written permission of such parent or other person.

The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years.

Handicap (Disability): According to Section 802(h) of the Fair Housing Act, as amended, handicap/disability means -

- (1) a physical or mental impairment which substantially limits one or more of such person's major life activities,
- (2) a record of having such an impairment, or
- (3) being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)).

California's Fair Employment and Housing Act (FEHA) is the primary state law which prohibits discrimination in the sale, rental, lease negotiation, or financing of housing. The FEHA has five additional protected classes: sexual orientation, marital status, ancestry, source of income and age.

Sexual Orientation: The FEHA defines this basis as heterosexuality, homosexuality, and bisexuality. Government Code Section 12926(q)

Marital Status: This basis refers to whether a person is married or not. The U.S. Census Bureau has four major "marital status" categories: never married, married, widowed, and divorced. These terms refer to the marital status at the time of the enumeration. The category married includes "married, spouse present" and "married, spouse absent."

Ancestry: According to the U.S. Census Bureau, ancestry refers to a person's ethnic origin or descent, "roots," or heritage, or the place of birth of the person or the person's parents or ancestors before their arrival in the United States. Some ethnic identities, such as "German" or "Jamaican" can be traced to geographic areas outside the United States, while other ethnicities such as "Pennsylvania Dutch" or "Cajun" evolved in the United States.

The intent of the ancestry question is not to measure the degree of attachment the respondent had to a particular ethnicity. For example, a response of "Irish" might reflect total involvement in an "Irish" community or only a memory of ancestors several generations removed from the individual. A person's ancestry is not necessarily the same as his or her place of birth, i.e., not all people of German ancestry were born in Germany.

Source of Income: The FEHA defines this basis as lawful, verifiable income paid directly to a tenant or paid to a representative of a tenant. A landlord is not considered a representative of the tenant. Government Code Section 12955(p)

Age: Refers to a person's chronological age. Civil Code Section 51.2 et. seq.

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Section 2

Fair Housing Progress Report

SECTION 2

FAIR HOUSING PROGRESS REPORT

A. INTRODUCTION

The *2005-2010 Regional AI* identified seven impediments to fair housing choice. The purpose of the “progress report” is to describe the progress made on eliminating or ameliorating the identified impediments. The *2005-2010 Regional AI* identified the following private and public sector impediments to fair housing choice.

1. Private Sector Impediments

1. Population and local government can't differentiate landlord/tenant issues vs. discrimination
2. Housing, industry discrimination: zoning, insurance, appraisals, advertising
3. “Color” blind policy causes disparate impact (i.e., credit scores in determining a person's insurability and occupancy restrictions).
4. Employer's lack of support for affordable housing results in segregated housing.
5. High loan denial rates are x3 among upper income Blacks and x2 for equally situated Hispanics.

2. Public Sector Impediments

1. Community Reinvestment Act (CRA) funds are not targeted in ways assisting low income persons and neighborhoods in home ownership and financial stability. (Refer to pages 2-5 and 2-6 for an explanation of the CRA.)
2. Some jurisdictions underestimate the extent of discrimination, therefore reducing or not paying fair share of services provided by FHCOC.

B. PROGRESS ON ELIMINATING OR AMELIORATING IMPEDIMENTS

The following pages describe the nature of the fair housing impediments identified in the *2005-2010 Regional AI* and the progress made in eliminating or ameliorating the adverse impacts caused by the impediments.

1. Confusion among Residents, Housing Providers and Local Government Officials Regarding the Protection Provided by Fair Housing Laws (both State and Federal)

Laws regarding landlord and tenant relationships are not covered in State or Federal Fair Housing Laws but are frequently confused by industry professionals, residents and government officials with fair housing. Gaining knowledge of the differences between fair housing laws and tenant/landlord laws is a continuing process. It is necessary for people engaged in real estate transactions and apartment management to have knowledge of fair housing laws.

The State Department of Real Estate (DRE) requires real estate brokers and salespersons to complete DRE-approved continuing education including a course on fair housing. The Apartment Association of Orange County (AAOC) represents and supports apartment owners, managers and suppliers. Since 1961, the AAOC has been a major resource for anyone involved in the rental housing industry in Orange County. The AAOC helps its members to stay continually informed on fair housing. The AAOC, for instance, conducts fair housing seminars to educate its members. The AAOC also conducts a Certified Housing Provider Program for apartment owners, property supervisors and resident managers. A review of fair housing laws is one part of this program.

With respect to tenant/landlord issues, the California Department of Consumer Affairs has published a 108-page *Guide to Residential Tenant's and Landlords' Rights and Responsibilities*. The Guide offers information on a variety of subjects such as rental agreements and leases, landlord disclosures, evictions, and problem resolution. Many cities make this *Guide* available to the public at the planning or community development department counter. Additionally, the California Apartment Association has published *Renting: A User Manual*, a 16-page guide for renters which discusses topics such as Tips for Renters, Moving In, Moving Out, and Rights and Responsibilities.

In order to increase public knowledge, the FHCOC has posted on its website a 16-page *Landlord-Tenant Frequently Asked Questions*, which provides useful information about the rights and obligations of tenants and landlords. The FAQ discusses important topics such as security deposits, failure to deliver a habitable rental unit, and terminating the tenancy.

Although no studies have been completed in Orange County, HUD sponsored studies have shown that the general public has a basic awareness of the nature and scope of fair housing laws. According to a recent study:

Both the 2000/1 and 2005 surveys posed a series of scenarios depicting actions taken by rental building owners, a home seller, a real estate agent and mortgage lenders, which might or might not have been discriminatory. Respondents were asked, first, if they agreed with each action and, second, if they believed it to be legal under Federal law. Steps were taken to protect against the scenarios and questions being too test-like, obvious, or patterned.

The 2005 survey reveals that for five of the eight scenarios portraying discriminatory behavior under Federal law there is essentially no change in the extent of public knowledge since 2000/1. In a sixth scenario involving use of the words "Christians preferred" in advertising an apartment, fewer people in 2005 than in 2000/1 were aware of the fact that this is unlawful. For the remaining two scenarios—one involving a real estate agent restricting a client's housing search to geographical areas based on racial concentration, and the other an apartment owner restricting a family to a particular building because they had children—more people are aware in 2005 than were aware in 2000/1 that these actions are illegal. When all responses to scenarios depicting illegal actions are summed to create an index representing the number each respondent correctly identified as illegal, there is no difference in the distribution of scores observed in 2005 compared to 2000/1. In both cases, about one-half of the public knew the law with respect to six or more of the scenario depictions.

While knowledge of fair housing law may not have expanded since the baseline survey, public support for it has. On a scenario-by-scenario basis support improved by as much

as nine percentage points when it comes to opposing restricting home sales based on race, and eight percentage points for opposing real estate agents limiting client home searches based on neighborhood racial composition. Somewhat smaller increases in support for the law are also observed for differential treatment of families with children, advertising a religious preference for an apartment, and restricting rental occupancy based on an applicant's religion.

When responses to each of eight scenarios depicting illegal actions are summed, the share of the public expressing support for the law in six or more scenario depictions strengthened from 66 percent in 2000/1 to 73 percent in 2005. Likewise, support for a hypothetical open-housing law that would prohibit home sellers from discriminating on the basis of race, religion or nationality also increased from 67 percent of the population in 2000/1 to 70 percent in 2005.

Source: The Urban Institute, Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law, prepared for the U.S. Department of Housing and Urban Development, Office of Policy Development and Research, February 2006, pages i and ii

2. Intentional Discrimination by Some Members of the Housing Industry Including, but not necessarily Limited to, Rental, Lending, Insurance, Zoning, Appraisals, and Advertising

Discriminatory practices are likely to persist in these fields. However, 2005 benchmark data are generally unavailable thereby impeding efforts to track changes or progress. Although lending data are available, the significant changes in underwriting practices in the past three years make it unwise to compare 2008 and 2009 Home Mortgage Disclosure Act (HMDA) data to 2004 and 2005 HMDA data. Discriminatory advertising seems to have been reduced as questionable words and phrases pertain mostly to "no pets", "source of income" and "age". The *2005-2010 Regional AI* had no specific analysis on zoning-related fair housing issues. The AI update contains an analysis of how zoning impacts fair housing on a jurisdiction-by-jurisdiction basis.

3. "Color" Blind Policy Causes Disparate Impact (i.e., Credit Scores in Determining a Person's Insurability and Occupancy Restrictions)

Data are unavailable to demonstrate the degree to which private sector policies have created disparate impacts for persons seeking a home loan, homeowners insurance, or how occupancy standards have reduced housing opportunities for families with children. Information is available on the degree to which "credit history" is a reason for denial of a home loan application. In 2008, 7.1% (White/Minority) to 22.5% (Blacks) of FHA loan applications were denied because of a poor credit history. In 2008, 3.0% (Native Hawaiian/Pacific Islander) to 20% (2 or more races) of conventional loan applications were denied because of poor credit history. However, too high a debt-to-income ratio is the most frequent reason for denial of a home loan application.

4. Employer's Lack of Support for Affordable Housing Results in Segregated Housing

Data are unavailable to determine if this impediment has been ameliorated or eliminated between 2005 and 2010.

5. High Loan Denial Rates are 3 Times among Upper Income Blacks and 2 Times for Equally Situated Hispanics

Evidence from the 2008 Home Mortgage Disclosure Act (HMDA) data indicates that loan denial disparities between White applicants and Black and Hispanic applicants have been reduced to less than 3 times for Blacks and less than 2 times for Hispanics in three of four income groups.

With respect to FHA loans, Blacks in all income groups have loan denial rates of less than two times compared to White applicants. With regard to conventional loans, the disparities are not as high as 3 times except for low income Black applicants (2.55). Refer to Table 2-1 for detailed rates.

Moderate-income Hispanics have a loan denial rate for FHA and conventional loans that is two times greater than White applicants. The very low, low and above moderate income Hispanics have loan denial rates less than two times the White applicant rates. Refer to Table 2-1 for detailed rates.

The disparities in loan denial rates between White applicants and Black and Hispanic applicants have been reduced since the 2005 *Regional AI* was prepared.

Table 2-1
Orange County
Disparities in Loan Denial Rates for Black and Hispanic Borrowers -2008

FHA Loans		
Income Group	Blacks	Hispanics
Very Low	N/A	1.64
Low	1.09	1.93
Moderate	1.90	1.87
Above Moderate	1.39	1.46

Conventional Loans		
Income Group	Blacks	Hispanics
Very Low	N/A	1.81
Low	2.55	1.62
Moderate	1.18	2.00
Above Moderate	1.25	1.65

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 5-1 Disposition of Applications for FHA, FSA/RHS and VA Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Income, Race and Ethnicity of Applicant, 2008

Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 5-2 Disposition of Applications for Conventional Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Income, Race and Ethnicity of Applicant, 2008

6. CRA Funds are not Targeted in ways Assisting Low Income Persons and Neighborhoods in Home Ownership and Financial Stability

The Community Reinvestment Act (CRA), Title VIII of the Housing and Community Development Act of 1977, is a federal law designed to encourage commercial banks and savings and loans to meet the needs of borrowers in all segments of their communities, including low- and moderate-income neighborhoods. Congress passed the Act in 1977 to reduce discriminatory credit practices against low- and moderate income neighborhoods, a practice known as redlining.

The CRA is implemented by regulations of the Office of the Comptroller of the Currency (OCC), the Board of Governors of the Federal Reserve System (Board), the Federal Deposit Insurance Corporation (FDIC), and the Office of Thrift Supervision (OTS) (collectively, the agencies).

CRA directs the agencies to encourage insured depository institutions to help meet the credit needs of the communities in which they are chartered. Institutions subject to data reporting requirements must report the aggregate number and amount of community development loans originated or purchased during the prior calendar year. A community development loan has community development as its primary purpose. As defined in the regulations, “community development” means—

- affordable housing (including multifamily rental housing) for low or moderate-income individuals;
- community services targeted to low- or moderate-income individuals;

All state member banks, state nonmember banks, national banks, and savings associations that are not small or special-purpose institutions are subject to the data collection and reporting requirements of the CRA. Institutions that are not small are considered large institutions. “Small” is defined as follows:

- “Small bank” or “small saving association” means an institution that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.098 billion.
- “Intermediate small bank” or “intermediate small savings association” means a small institution with assets of at least \$274 million as of December 31 of both of the prior two calendar years, and less than \$1.098 billion as of December 31 of either of the prior two calendar years.

The CRA requires the Federal Deposit Insurance Corporation (FDIC) and other agencies to assess an institution’s CRA performance. A financial institution’s performance is evaluated in the context of information about the institution (financial condition and business strategies), its community (demographic and economic data), and its competitors. Upon completion of a CRA examination, the FDIC rates the overall CRA performance of the financial institution using a four-tiered rating system consisting of:

- Outstanding
- Satisfactory
- Needs to Improve
- Substantial Noncompliance

Between 2005 and 2010, 22 assessments have been conducted of financial institutions located in the area covered by the *Regional AI*. The performance evaluations resulted in the following ratings:

- Outstanding = 4
- Satisfactory = 16
- Needs to Improve = 2

Based on these ratings, the institutions covered by the CRA are meeting the objectives of the law. The FHCOC will track whether institutions rated “need to improve” move to “satisfactory” when their next assessment is completed.

7. Some Jurisdictions Underestimate the Extent of Discrimination, Therefore Reducing or not Paying Fair Share of Services Provided by FHCOC

Data on the number of housing discrimination complaints filed by residents of each city are included in Section 5 of the *2010-2015 Regional AI*. These data can be used to develop a fair share formula for payment of services provided by the FHCOC.

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Section 3

Fair Housing Action Plan

2010-2015

SECTION 3

FAIR HOUSING ACTION PLAN

A. INTRODUCTION

Section 3 describes the following:

- A summary of Section 4 - Fair Housing Community Profile which contains information on population and housing trends as well as the characteristics of the “protected classes.”
- A summary of Section 5 – Regional Private Sector Fair Housing Analysis which includes information on private sector impediments and a description of 25 actions to be taken by the Fair Housing Council of Orange County.
- A summary of Section 6 – Public Sector Fair Housing Analysis which includes information on the public sector impediments and a description of the actions to be taken by the Fair Housing Council of Orange County, each participating city that identified impediments, and the County of Orange.
- A summary of Section 7 – Affirmatively Furthering Fair Housing through the Location of Affordable Housing which examines if affordable housing is predominantly located outside areas of high minority and high low income population concentrations.

B. FAIR HOUSING COMMUNITY PROFILE

1. Orange County Population Growth Trends

Demographic information concerning the characteristics of the Entitlement Cities and Urban County Cities is a key element of the *Analysis of Impediments to Fair Housing Choice and Fair Housing Action Plan*. The Fair Housing Community Profile demonstrates the extensive size and diversity of the Fair Housing Council’s service area. The Fair Housing Council provides services to a service area of about 2.7 million persons who reside in 29 jurisdictions and in an area that has recently transitioned to a minority-majority county, which indicates that there will be a continuing need for a variety of housing services.

The racial and ethnic composition of Orange County’s population has been experiencing dramatic change for the past 40 years but has recently passed a major milestone. In 2000, Whites accounted for more than 50% of Orange County’s population. By 2007, the White population accounted for 43.6% of Orange County’s population and it is now a minority-majority county. Orange County’s Hispanic population has now passed the one-million mark and has grown from 30.9% of the population to 35% of the population. The Asian population has also experienced rapid growth. In 2000, the Asian population stood at 395,994 representing 13.8% of Orange County’s population and in 2007 reached 520,401 representing 16.8% of the county’s population. Both the Black population and those classified as “All Other Races” have experienced some growth since 2000.

Population change is the result of three factors: births, deaths, and migration. The White population in Orange County has decreased since 2000, because the number of births just

slightly exceeded number of deaths by approximately 3,000, while at the same time, the number of Whites moving out of Orange County exceeded the number of Whites moving into Orange County by 129,805. The net result was that the White population declined by 126,623.

On the other hand, the Hispanic population grew by 157,266 due to births and another 55,144 due to migration, while the total number of deaths was 13,159. The net result was that the Hispanic population grew by nearly 200,000 persons between 2000 and 2007. The pattern of growth for Asians is somewhat different than it is for Hispanics. Migration is the major factor for Asian population increase, while births are the major factor for Hispanic population increase. Between 2000 and 2007, the Asian population grew by 95,388 due to migration, while it added just fewer than 30,000 persons through natural increase (births minus deaths).

As Orange County's remaining developable land is consumed, the level of growth will moderate each decade. However, some of the demographic trends that have marked the first decade of the twenty-first century will continue. The Hispanic population will nearly double by 2030 from 2000. Between 2010 and 2020 it will surpass the size of the White population and will be the largest population group in the county. The same factors that have marked change from 2000 to 2007 will also influence the change in the Hispanic population. Even though the Hispanic fertility will decline, numerically higher levels of births will increase the population while migration will play a significant role, but a secondary role, in its growth.

The Asian population will also experience significant growth between 2000 and 2030, adding 283,656 persons to its population. Migration will play a larger role than fertility. The fertility rates of Asians have been diverse depending on the Asian group. It is anticipated that rates for those groups with higher fertility rates presently will decline. Thus, the number of Asian births is also expected to decline.

Continued declines for the White population can be attributed to the overall aging of the White population. First of all, the number of persons in child bearing ages will decline. Even with constant fertility rates, the number of births will decline. Second of all, the overall level of mortality will rise as the population gets older. Whites are also expected to experience a net out-migration, thus resulting in further declines in their population.

Although their impact on the population will not be as great as that of Asians, Hispanics and Whites, the Black population will decline while the population of "All Other Races" will increase. The factors that will influence the change in the White population are the same that will influence the decline in the Black population. For those classified as "All Other Races," it is births that will result in the population increase. The underlying factor will be more interracial couples having children as Orange County's population becomes more racially and ethnically diverse.

2. Population Characteristics of the Protected Classes

The Fair Housing Act, 42 U.S.C. 3601 et. seq., prohibits discriminatory practices which make housing unavailable to persons because of:

- Race
- Color
- Religion
- Sex
- National Origin

- Familial Status or
- Handicap/Disability

The California Fair Employment and Housing Act (Article 2, Section 12955) makes it unlawful:

to discriminate against or harass any person because of the race, color, religion, sex, sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability of that person.

Under the provisions of Civil Code Section 51.2 et. seq. age is a protected class.

Hence, the California law has added the following to the group of protected classes:

- Sexual Orientation
- Marital Status
- Ancestry
- Source of Income
- Age

The Unruh Civil Rights Act, California Civil Code sections 51 through 51.3, provides protection from discrimination by all business establishments in California, including housing and public accommodations. The Unruh Civil Rights Act specifically outlaws discrimination in housing and public accommodations based on sex, race, color, religion, ancestry, national origin, disability, or medical condition. While the Unruh Civil Rights Act specifically lists "sex, race, color, religion, ancestry, national origin, disability, or medical condition" as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics. The Act is meant to cover all arbitrary and intentional discrimination by a business establishment on the basis of personal characteristics similar to those listed above.

Part C of Section 4 presents demographic data on the following protected classes: race/color, sex, national origin/ancestry, familial status, handicap/disability, and marital status. Table 3-1 on the next page is a summary of the demographic characteristics of the protected classes. The data on the number and percentage of housing discrimination complaints is based on the five year period from 2005 through 2009 as compiled for the *Regional AI* by the State Department of Fair Employment and Housing. The housing discrimination data are discussed in more detail in Section 5.

Table 3-1
Regional Analysis of Fair Housing Impediments
Characteristics of the Protected Classes

Protected Class	Demographic Characteristics	Number of Housing Discrimination Complaints	Percent of All Housing Discrimination Complaints
Race/Color	Population of 3,119,500 in Orange County: 45.9% is White Alone; 54.1% is Minority	76 of 372	20.4%
Sex	209,600 female householders live in <i>Regional AI</i> area; 146,700 male householders live in <i>Regional AI</i> area. Estimates exclude married householders.	20 of 372	5.4%
National Origin/Ancestry	County's foreign born population is 936,000, which represents 30% of the total population. Vast majority of foreign born population is from Latin America and Asia.	53 of 372	14.2%
Familial Status	Almost 280,000 families with children live in the <i>Regional AI</i> area – almost 30% of the families (80,000) reside in Anaheim and Santa Ana.	45 of 372	12.1%
Handicap/Disability	140,000 disabled persons reside in Entitlement Cities; 7.4% of non-institutionalized population is disabled. 98,900 disabled persons live outside the Entitlement Cities; 8.1% of non-institutionalized population is disabled.	129 of 372	34.7%
Marital Status	About 339,000 married couples live in Entitlement Cities; 54% of all households. About 81,200 married couples live in Urban County Cities; 55% of all households.	15 of 372	4.0%

C. PRIVATE SECTOR IMPEDIMENTS AND ACTIONS TO BE TAKEN

The *Regional AI* examines the following private sector impediments:

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

Part C provides a summary of the detailed information on each impediment contained in Section 5. Additionally, the actions to be taken by the FHCOC to ameliorate or eliminate the impediments are described in this part. The key rationale for preparation of a *Regional AI* is that *private sector* impediments are regional in nature and affect multiple communities – that is, they are not limited to a single jurisdiction responsible for AFFH. The FHCOC has a wealth of experience in dealing with fair housing impediments that occur in the private sector. HUD guidance indicates that the *Regional AI* must describe appropriate actions to overcome the effects of the private sector impediments that are identified through the analysis. The FHCOC understands the private sector and is well equipped to analyze impediments, describe appropriate actions, and to follow-through on those actions.

The actions to be taken between 2010 and 2015 to remove or ameliorate impediments to fair housing choice and, thereby, affirmatively further fair housing are organized according to four timelines:

- Ongoing: will be accomplished annually
- Near-Term: will be accomplished in Program Year 2010-2011
- Mid-Term: will be accomplished in Program Years 2011-2012/2012-2013
- Long-Term: will be accomplished in Program Year 2013-2014/2014-2015

Chart 3-1 on the following six pages describes each action to be taken according to the above timelines. All the actions will be implemented by the FHCOC. In August of each year, the FHCOC will report its progress on implementing the planned actions for the prior program year to the Entitlement Cities and County of Orange.

A summary of the private sector impediments and list of planned actions follows Chart 3-1.

Chart 3-1
Regional Analysis of Fair Housing Impediments
Private Sector Analysis
Private Sector Impediments
Fair Housing Action Plan: 2010-2015

Fair Housing Action	Ongoing Annually	Near-Term Program Year 2010-2011	Mid-Term Program Years 2011-2012/2012-2013	Long-Term Program Years 2013-2014/ 2014-2015
Housing Discrimination	Continue to process housing discrimination complaints filed by city and county residents.		Conduct testing of housing provider practices to determine whether there are differences in treatment based on a protected class. The 2005-2009 housing discrimination complaint data and the fair housing community profile can be used to identify the protected classes and locations of housing providers that should be tested.	
			Revise its website to provide direct access to a housing discrimination complaint form and provide a diagram or brief explanation of the process for investigating and resolving a complaint.	
			Revise its website to add more information on how residents can detect whether they have been victims of unlawful housing discrimination.	

Chart 3-1-continued

Fair Housing Action	Ongoing Annually	Near-Term Program Year 2010-2011	Mid-Term Program Years 2011-2012/2012-2013	Long-Term Program Years 2013-2014/ 2014-2015
Housing Discrimination			Publish a quarterly report on the FHCOC website summarizing the remedies pertaining to filed housing discrimination complaints.	
			Ensure that all jurisdictions provide a link to the FHCOC website	
			Compile an Annual Report on housing discrimination complaints filed with the FHCOC, the State Department of Fair Employment and Housing (DFEH) and HUD. The report will include housing discrimination complaints unique to each participating jurisdiction as well as those of the entire County. The Annual Report will describe emerging trends within the cities and County. (Annually beginning in Program Year 2011-2012)	

Chart 3-1-continued

Fair Housing Action	Ongoing Annually	Near-Term Program Year 2010-2011	Mid-Term Program Years 2011-2012/2012-2013	Long-Term Program Years 2013-2014/ 2014-2015
Housing Discrimination			Transmit the Annual Report to the participating jurisdictions by August of each calendar year. This schedule allows the jurisdictions to include a summary of the report findings in the Consolidated Plan Annual Performance and Evaluation Report. That Report is published in September of each year. (Annually beginning in Program Year 2011-2012)	
Discriminatory Advertising		<p>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.</p> <p>Encourage apartment rental websites to display more prominently their Fair Housing Notice.</p>	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, 42 U.S.C. § 3601 et seq.	

Chart 3-1-continued

Fair Housing Action	Ongoing Annually	Near-Term Program Year 2010-2011	Mid-Term Program Years 2011-2012/2012-2013	Long-Term Program Years 2013-2014/ 2014-2015
Discriminatory Advertising	Prepare a summary of the accomplishments each year and transmit to the Entitlement Cities and Urban County in August of each year. This schedule allows the Entitlement Cities and Urban County to include a summary of the accomplishments in the Consolidated Plan Annual Performance and Evaluation Report. That Report is published in September of each year.	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.	Periodically review for rent and for sale ads published in the print media.	
Blockbusting				Provide information on the FHCOC website on the unlawful practice of blockbusting including examples of this illegal practice.
				Work with the California Department of Real Estate to determine if any Orange County licensees have had their licenses suspended or revoked because of the illegal practice of blockbusting.

Chart 3-1-continued

Fair Housing Action	Ongoing Annually	Near-Term Program Year 2010-2011	Mid-Term Program Years 2011-2012/2012-2013	Long-Term Program Years 2013-2014/ 2014-2015
Blockbusting				In the event, a licensee has been found to have committed blockbusting, provide education and information on this practice to the responsible broker and all related salespersons.
Denial of Reasonable Modification/Reasonable Accommodation			Provide education and information on why this practice is unlawful to the owners and managers of apartment complexes and homeowner associations.	
			Provide information on the unlawful practice of denying reasonable modifications and reasonable accommodations at fair housing seminars conducted by the Apartment Association of Orange County.	
Hate Crimes			Coordinate with the Orange County Human Relations Commission, Center OC and the Orange County Victim Assistance Partnership.	
			Provide affected residents – when needed - with referrals to hate crime victim resources.	

Chart 3-1-continued

Fair Housing Action	Ongoing Annually	Near-Term Program Year 2010-2011	Mid-Term Program Years 2011-2012/2012-2013	Long-Term Program Years 2013-2014/2014-2015
Unfair Lending	Monitor the HMDA data annually using the 2008 HMDA analysis as a benchmark.		Complete a HMDA analysis of the top 10 lenders in Orange County to compare and contrast loan denial rates.	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 <i>same</i> time period.
			Conduct outreach to cultural, ethnic and minority organizations to potentially increase interest and readiness in home purchases.	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.

1. Housing Discrimination

a. Impediment

Housing discrimination, especially in the rental housing market, is an impediment to fair housing choice because 60 complaints annually are filed by residents of the participating entitlement cities and Urban County.

The California Department of Fair Employment and Housing (DFEH) compiled data on housing discrimination complaints for this *Regional AI*. In the five-year period since the prior AI, about 300 housing discrimination complaints have been filed with DFEH. Annually, the number of housing discrimination complaints averaged 60 per year. The number of cases ranged from a low of 46 in 2005 to a high of 78 in 2006. The vast majority – 244 of 302 housing discrimination complaints – have been filed in the Entitlement Cities. Irvine (58) and Anaheim (40) accounted for the highest number of complaints.

A housing discrimination complaint can have more than one basis. The bases include:

- Physical Disability
- Mental Disability
- Race/Color
- National Origin
- Familial Status
- Sex
- Marital Status
- Other - Retaliation; Religion; Source of Income; Association and Age

About 35% of the housing discrimination complaints were based on a physical or mental disability. Since the prior *Regional AI* was completed, disability has been increasing as a basis for a housing discrimination complaint. Race and color (20%) and national origin (14%) rank second and third as a basis for making a housing discrimination complaint. Although Individual cities vary in terms of the basis for a housing discrimination complaint, disability, race/color and national origin comprise the basis for the highest number of complaints.

The DFEH compiles data on number of housing discrimination cases according to nine types of alleged acts:

- Refusal to Rent
- Eviction
- Refusal to Show
- Loan Withheld
- Unequal Terms
- Harassment
- Unequal Access to Facilities
- Denied Reasonable Modification/Accommodation

A summary of the highest number and percentage of alleged acts is presented below:

- About 22% (101) of the housing discrimination complaints occurred during the eviction process.

- About 19% each of the alleged acts pertained to unequal terms (88) and to denial of a reasonable modification and/or accommodation (87).
- About 15% each of the housing cases were filed because of harassment (72) and the refusal to rent (68).

It appears that most of the alleged acts affect renters or persons seeking rental housing. This mirrors HUD's national study which found that about 70% of the persons who thought they were victims of discrimination were looking to rent at the time.

b. Actions to be Taken

During the 2010-2015 period, the FHCOC will undertake the following actions:

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. The 2005-2009 housing discrimination complaint data and the fair housing community profile can be used to identify the protected classes and locations of housing providers that should be tested.
3. Revise its website to provide direct access to a housing discrimination complaint form and provide a diagram or brief explanation of the process for investigating and resolving a complaint.
4. Revise its 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 State Department of Fair Employment and Housing (DFEH) and HUD. The report will include housing discrimination complaints unique to each participating jurisdiction as well as those of the entire County. The Annual Report will describe emerging trends within the City and County.
8. Transmit the Annual Report to the participating jurisdictions by August of each calendar year. This schedule allows the jurisdictions to include a summary of the report findings in the Consolidated Plan Annual Performance and Evaluation Report. That Report is published in September of each year.

2. Discriminatory Advertising

a. Impediment

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.

Section 804 (c) of the 1968 Fair Housing Act prohibits discriminatory advertising; it is unlawful:

To make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.

The California Fair Employment and Housing Act contains similar language prohibiting discriminatory advertising.

To demonstrate whether discriminatory advertising meets the threshold for being considered a regional impediment to fair housing choice, print and online advertising was reviewed during the month of January 2010. Classified ads printed in the Los Angeles Times and Orange County Register were reviewed for words and phrases that might be viewed as discriminatory. During this period, however, few for-rent ads were published in either newspaper. Because of limited newspaper print advertising, an online search of apartment ads was conducted via Apartments.com, which is provided by the Los Angeles Times.

Each ad was reviewed to determine if it might indicate a “preference, limitation or discrimination.” Advertisements which describe the property being advertised or the services available at the property are generally considered acceptable. The review, then, focused on words and phrases that deviated from physical descriptions of the property and available services.

1. *Source of Income:* Source of income is a protected class under California’s fair housing law, effective January 1, 2000. Thus, it is unlawful to print or publish an advertisement that prefers, limits or discriminates on the basis of the source of the tenant’s income. An ad stating “No Section 8” would not be illegal because under the California Fair Employment and Housing Act, “source of income” refers to income paid directly to a tenant or tenant’s representative. A landlord that receives a Section 8 rental payment on behalf of a tenant from a housing authority is not considered a representative of the tenant.

The rental housing market is currently accepting tenants that receive Section 8 rental assistance. Many ads contained phrases such as “Section 8 OK”; “HUD OK”; “Section 8 Welcome”; and “Section 8 Accepted”. When the rental housing market vacancy rates become significantly lower, landlords may not have an incentive to attract tenants receiving Section 8 assistance. Under these conditions, “No Section 8” ads may become an impediment to fair housing choice because, in part, they could make such housing unavailable disproportionately to a protected class such as persons with disabilities.

2. *No Pets*: An analysis was completed of the print ads with respect to the Entitlement City in which the apartment complex is located; number of ads placed; ads with non-property related words and phrases; and the number of ads published with those words and phrases. Forty seven of the 223 apartment ads contained non-property related words or phrases. The overwhelming majority of the non-property related words or phrases was "No Pets" which occurred in 38 (17%) of the 223 apartment ads. Twenty-eight of the 204 homes for rent ads contained non-property related words or phrases. Once again, "no pets" was the most frequent non-property related word or phrase, having occurred in 26 (12.7%) of the 204 ads.

There were 62 unique ads for apartments and homes for rent in the Urban County jurisdictions. Ten ads had words and phrases that did not pertain to the physical description of the property: seven stated "no pets," two were "Section 8" related and one ad stated "Senior Citizen".

Under Federal and State fair housing laws, individuals with disabilities may ask their housing provider to make reasonable accommodations in the "no pets" policy to allow for their use of a companion/service animal. The housing provider may ask the disabled applicant/tenant to provide verification of the need for the animal from a qualified professional. Once that need is verified, the housing provider must generally allow the accommodation.

Some disabled persons are unaware of their fair housing rights and, as a consequence, may not consider as available to them apartments with ads that state "no pets."

3. *Age*: Federal regulations specify that unless the housing being offered meets government requirements for "senior" or "senior only" housing, advertisers may not express a preference or limitation on the basis of age. A few ads contained phrases indicating a preference for seniors. One ad stated "senior citizen". It appears that this ad was placed by an individual owner of a condominium. However, it is not known if the condominium complex met the requirements of a senior only complex. Two apartment complexes placed ads stating that a 5% discount was given to seniors. The complexes are located in Orange and Westminster and are managed by the same company.

b. Actions to be Taken

During the five-year of the Consolidated Plan, the FHCOC will undertake the following actions:

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, 42 U.S.C. § 3601 et seq.

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 Entitlement Cities and Urban County in August of each year. This schedule allows the Entitlement Cities and Urban County to include a summary of the accomplishments in the Consolidated Plan Annual Performance and Evaluation Report. That Report is published in September of each year.

3. Blockbusting

a. Impediment

Blockbusting is unlawful; however, it does not appear to be a significant impediment to fair housing choice.

Section 804(e) of the 1968 Fair Housing Act makes the following act, commonly referred to as blockbusting, unlawful:

For profit, to induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, handicap, familial status, or national origin.

With respect to blockbusting, the California law has more protected classes than the Federal Fair Housing Act.

There is no local or county agency that maintains records on actual or potential blockbusting incidents. Such incidents would take place primarily as real estate agents attempt to solicit or induce homeowners to sell their homes. The California Real Estate Commissioner is authorized to take disciplinary action against licensees who have committed the prohibited discriminatory practice of blockbusting and panic selling. The Department of Real Estate stated in June 2010 that no Orange County licensee has had their license suspended or revoked because of the illegal practice of blockbusting.

b. Actions to be Taken

During the five-year period of the Fair Housing Action Plan, the FHCOC will take the following actions:

1. Provide information on the FHCOC website on the unlawful practice of blockbusting including examples of this illegal practice.
2. Work with the California Department of Real Estate to determine if any Orange County licensees have had their licenses suspended or revoked because of the illegal practice of blockbusting.

3. In the event, a licensee has been found to have committed blockbusting, provide education and information on this practice to the responsible broker and all related salespersons.

4. Denial of Reasonable Modification/Reasonable Accommodation

a. Impediment

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.

It is unlawful to refuse to make reasonable accommodations for disabled persons. Section 804 (3) of the 1968 Fair Housing Act states that discrimination includes--

(A) a refusal to permit, at the expense of the handicapped person, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises, except that, in the case of a rental, the landlord may where it is reasonable to do so condition permission for a modification on the renter agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted.

(B) a refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling.

The DFEH compiles data on the number of housing discrimination cases according to nine types of alleged acts. During the 2005-2009 period, 461 alleged discriminatory acts were committed in the cases processed by the DFEH. Of this total, 87 or 18.9% involved denial of a reasonable modification/reasonable accommodation. About 17-18 denials of reasonable modification/reasonable accommodation occurred per year during the five-year period.

b. Actions to be Taken

During the five-year period of the Fair Housing Action Plan, the FHCOC will take the following actions:

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.

5. Hate Crimes

a. Impediment

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.

Hate crime events were reviewed for the 5-year period from 2004 to 2008 as reported by Criminal Justice Statistics Center of the California Department of Justice (DOJ). The annual average of events was 73 and, during the five-years there was a narrow low (69) to high (79) range. Except for the City of Huntington Beach, on a city-by-city basis, the number of hate crime events is low.

In 2008, according to the Orange County Human Rights Commission (OCHRC), there were 79 cases of hate crimes in Orange County, essentially unchanged from the 80 cases in 2007. Despite the fact that the African American population makes up less than 2% of Orange County's population, this group continues to be the most frequent target for hate crimes. Hate crimes against Latinos continues to increase. In fact, since 2006 there has been almost a 100% increase in the number of cases reported. After a four-year downward trend, hate crimes against Jews increased. Additionally, while there was a slight decrease in hate crimes reported against Gays and Lesbian, this group frequently underreports.

In 2008, 29% and 19% of the hate crimes in Orange County had an anti-African American and anti-Latino bias motivation.

The California DOJ reports the location of hate crime events for the entire state by 25 categories (e.g., church, park, college, etc). During the past five years two locations are predominant, accounting for about 60% of all hate crime locations: Highway/Road/Alley/Street (29.1%) and Residence/Home/Driveway (29.7%).

The application of the statewide housing location average of 29.7% to the annual Orange County average of hate crime events of 73 yields an estimate of 22 annual events occurring at a residence, home or driveway. The application of the 40% factor cited by the OCHRC yields an estimate of 29 events occurring at a housing location.

On an individual city basis, the number of hate crime events occurring at a *housing* location is small. However, the number at the countywide level is significant and, as a result, the resources to monitor and alleviate this impediment are best handled at the regional level.

b. Actions to be Taken

During the five-year of the Fair Housing Action Plan, the FHCOC will take the following actions:

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.

6. Unfair Lending

a. Impediment

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.

Section 805 of the Fair Housing Act (42 U.S.C. 3605) states that it is “unlawful for any person or other entity whose business includes ... the making or purchasing of loans or providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling... to discriminate against any person...because of race, color, religion, sex, handicap, familial status, or national origin.”

The Equal Credit Opportunity Act (ECOA) 15 U.S.C. 1691 *et seq.* prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age, because an applicant receives income from a public assistance program, or because an applicant has in good faith exercised any right under the Consumer Credit Protection Act.

To supplement federal legislation, state laws have been enacted to forbid the discriminatory practice known as “redlining;” a practice results in blanket refusals by some lenders to make loans in whole neighborhoods or geographic areas. Redlining is illegal in California pursuant to the Housing Financial Discrimination Act of 1977 (Holden Act). (Health & Safety Code Section 35800-35833) The Holden Act prohibits the consideration of race, color, religion, sex, marital status, national origin, or ancestry in lending for the purchase, construction, improvement, or rehabilitation of housing. Further, lenders cannot deny loan applications because of ethnic composition, conditions, characteristics, or expected trends in the neighborhood or geographic area surrounding the property.

An analysis of the 2008 Home Mortgage Disclosure Act (HMDA) data was completed in order to determine loan denial rates by census tract, race/ethnicity and income. HMDA requires lenders to report on the action taken on each loan application, as follows:

- Loan Originated
- Application Approved, Not Accepted
- Application Denied
- Application Withdrawn
- Filed Closed for Incompleteness

Many determinants of a loan decision – such as borrower credit history, debt-to-income-ratio and loan-to-value ratio - are not included in the HMDA data. Although the loan denial rates do not support definitive conclusions regarding discrimination on the bases of race or ethnicity, they are a useful screen to identify disparities in loan approval rates by the race and ethnicity of applicants and geographic markets where differences in denial rates warrant further investigation. Additionally, identifying census tracts/neighborhoods with high loan denial rates helps to target credit counseling and homebuyer education programs.

Evidence from the 2008 Home Mortgage Disclosure Act (HMDA) data reveals the loan denial disparities between White applicants and Black and Hispanic applicants. Moderate income Blacks have an FHA loan denial rate almost two times greater than moderate income White applicants. Above moderate income Blacks have an FHA loan denial rate about 1.4 times greater than White applicants with identical incomes. The conventional loan disparities are lower for moderate and above moderate income applicants than for FHA loans. However, low income Blacks have a conventional loan denial rate 2.55 times greater than White applicants.

Moderate-income Hispanics have a loan denial rate for FHA and conventional loans that is two times greater than White applicants. The very low, low and above moderate income Hispanics have loan denial rates 1.46 to 1.93 higher than White applicants.

Unfair lending is manifested more in the loan denial disparities experienced by different racial/ethnic borrowers than by the denial rate disparities experienced in neighborhoods with 20%-79% minority populations, regardless of income.

Additionally, a regression analysis was completed to determine if race/ethnicity is associated with the denial of loan applications. Two types of loans applications were considered in the analysis: (1) home purchases with conventional loans and (2) home purchases with FHA loan.

A logit regression was used to "predict" if a loan was denied based on the minority population and income ratio of the census tract, as well as the loan amount. These variables were chosen because the results of a preliminary analysis utilizing census tract level data suggested each of these variables were influencing denials. Each of the three variables was significant predictors of loan denials for conventional loan applications, while the percent minority and the income ratio of a census tract were significant predictors of denials for FHA loan applications.

For conventional loans, the probability of a loan being denied increased as the percentage *minority population* in the census tract *increased*, as the *income increased* the probability of a denial *decreased*, and as the *amount of the loan increased* the probability of a loan denial *increased*.

b. 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.

D. ACTIONS TO ADDRESS PUBLIC SECTOR IMPEDIMENTS

1. Public Sector Impediments Common to Most Participating Jurisdictions

As part of the preparation of an *Analysis of Impediments to Fair Housing Choice* participating cities responded to a 24-question survey 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. The survey 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. 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.

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.

Government Code Section 65582(f) states:

“Supportive housing’ has the same meaning as defined in subdivision (b) of Section 50675.14 of the Health and Safety Code”

Health and Safety Code Section 50675.14(b) states:

“For purposes of this section, ‘supportive housing’ means housing with no limit on length of stay, that is occupied by the target population as defined in subdivision (d) of Section 53260, and that is linked to onsite or offsite services that assist 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.”

Health and Safety Code Section 53260(d) states:

“Target population’ means adults with low incomes having *one or more disabilities*, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people.” [emphasis added]

Government Code Section 65582(g) states:

“Transitional housing’ has the same meaning as defined in subdivision (h) of Section 50675.2 of the Health and Safety Code.”

Health and Safety Code Section 50675.2(h) states:

“Transitional housing’ and ‘transitional housing development’ means buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.”

Health and Safety Code Section 50801(i) states:

“Transitional housing’ means housing with supportive services for up to 24 months that is exclusively designated and targeted for recently homeless persons. Transitional housing includes self-sufficiency development services, with the ultimate goal of moving recently homeless persons to permanent housing as quickly as possible, and limits rents and service fees to an ability-to-pay formula reasonably consistent with the United States Department of Housing and Urban Development’s requirements for subsidized housing for low-income persons. Rents and service fees paid for transitional housing may be reserved, in whole or in part, to assist residents to move to permanent housing.”

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. The federal Departments of Justice (DOJ) and Housing and Urban Development (HUD) as well as the California Attorney General have encouraged local governments to adopt a reasonable accommodation procedure. The DOJ and HUD have stated:

“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 the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, page 5.

On May 15, 2001 the State Attorney General transmitted a letter to all local governments advising the localities to consider adoption of a reasonable accommodation procedure. In that letter, the Attorney General stated:

“Both the federal Fair Housing Act ('FHA') and the California Fair Employment and Housing Act ('FEHA') impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations and practices when such accommodations 'may be necessary to afford' disabled persons 'an equal opportunity to use and enjoy a dwelling.'”

Many jurisdictions currently handle requests for relief from the zoning ordinance through variance or conditional use permits. The Attorney General remarked that:

“...the criteria for determining whether to grant a variance or conditional use permit typically differ from those which govern the determination whether a requested accommodation is reasonable within the meaning of fair housing laws.

“Thus, municipalities relying upon these alternative procedures have found themselves in the position of having refused to approve a project as a result of considerations which, while sufficient to justify the refusal under the criteria applicable to grant of a variance or conditional use permit, were insufficient to justify the denial when judged in light of the fair housing laws' reasonable accommodations mandate.”

The Attorney General also stated that the variance and conditional use permit procedures – with their different governing criteria – serve to encourage community opposition to projects housing the disabled. The Attorney General wrote:

“Yet this is the very type of opposition that, for example, the typical conditional use permit procedure, with its general health, safety and welfare standard, would seem rather predictably to invite, whereas a procedure conducted pursuant to the more focused criteria applicable to the reasonable accommodation determination would not.”

The advice of the Attorney General is to establish a reasonable accommodation procedure instead of relying on the conditional use permit and variance procedures to process a request for disabled persons seeking specific exceptions to zoning and land-use rules (variances) necessary for them to be able to fully use and enjoy housing. A public hearing is not required for approval of a reasonable accommodation request.

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.

Attachment B in Section 6 (page 6-34) is an example of a reasonable accommodation procedure.

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. There is a high incidence of disability in the homeless population, domestic violence overwhelmingly impacts women, and people with HIV/AIDS are considered disabled under fair housing law. While age is not a characteristic protected under federal fair housing law, it is covered under state law, and the higher incidence of disability in the frail elderly introduces possible fair housing implications for that population as well.

Entitlement cities and the Urban County should consider enacting special needs housing zoning regulations. Attachment C in Section 6 (page 6-37) provides an example of such 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. Attachment D in Section 6 (page 6-47) provides an example of such zoning regulations.

2. City Identified Public Sector Impediments

Based on an evaluation of City Zoning and Planning Codes as well as policies and practices that may pose an impediment to Fair Housing Choice, the City of Newport Beach did not identify any public sector impediments.

Reference: Technical Appendix G: Survey of Zoning and Planning Codes, Policies and Practices that May Pose an Impediment to Fair Housing Choice

3. 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. Actions to be Taken by the City

Based on an evaluation of City Zoning and Planning Codes as well as policies and practices that may pose an impediment to Fair Housing Choice, the City of Newport Beach did not identify any public sector impediments.

Therefore, there are no actions to be taken at this time by the City with respect to public sector impediments.

Reference: Technical Appendix G: Survey of Zoning and Planning Codes, Policies and Practices that May Pose an Impediment to Fair Housing Choice

E. ACTIONS TO AFFH THROUGH THE LOCATION OF AFFORDABLE HOUSING

As explained in Section 7, the location of affordable housing is central to fulfilling the commitment to AFFH because it determines whether such housing will reduce or perpetuate residential segregation. The data analysis shows that affordable housing is predominantly located outside areas of high minority and high low income population concentrations. Many of the developments were constructed before localities were required to develop policies to guide the location of affordable housing.

During the 2010-2015 period, the FHCOC will take the following actions:

- Provide technical assistance to participating jurisdictions on how the location of affordable housing contributes to AFFH.

This action will be accomplished on an as needed, as requested basis.

- Aggregate - for each census tract - the number of voucher holders assisted by all four housing authorities.

This action will be accomplished in calendar year 2011.

- Conduct an analysis of the location of affordable housing in census tracts with a low concentration of minority and low income populations for purposes of determining whether they offer sufficient affordable housing opportunities.

This action will be accomplished either in calendar year 2011 or as soon as Census 2010 and American Community Survey data are available.

- Extend the analysis to include census tracts with minority populations in the range of 60 to 80%.

This action will be accomplished either in calendar year 2011 or as soon as Census 2010 and American Community Survey data are available.

- Suggest policies that the Housing Authorities and/or entitlement cities and the Urban County Program can implement to promote affordable housing opportunities outside of census tracts with high percentages of poverty and minority populations.

This action will be accomplished during the Fair Housing Council of Orange County's review of the housing authority annual plans. Additionally, the Council will provide input to the entitlement cities and Urban County Program on an as needed, as requested basis.



Section 4

Fair Housing Community Profile

SECTION 4

FAIR HOUSING COMMUNITY PROFILE

A. INTRODUCTION

Demographic information concerning the characteristics of the Entitlement Cities and Urban County Cities is a key element of the *Analysis of Impediments to Fair Housing Choice* and *Fair Housing Action Plan* for the reasons explained below.

First of all, the Fair Housing Community Profile demonstrates the extensive size and diversity of the Fair Housing Council's service area. The Fair Housing Council provides services to a service area of about 2.7 million persons who reside in 29 jurisdictions and in an area that has recently transitioned to a minority-majority county, which indicates that there will be a continuing need for a variety of housing services.

Second, demographic data provide benchmark data for the entire service area, individual cities and the County of Orange. Emerging trends can be pinpointed as Census 2010 and the 2010 *American Community Survey* data are released. Future year data can be contrasted to the statistics presented in this Fair Housing Community Profile to detect emerging trends.

Third, the Fair Housing Community Profile establishes a database that the Fair Housing Council can utilize for a number of purposes. For instance, information contained in the Profile can be used to compete for grants under HUD's competitive Fair Housing Initiatives Program as well as other public and private grant programs.

Fourth, the information in the Profile and future updates can be used to adjust and re-focus the delivery of fair housing services by the Fair Housing Council. For example, the data provide a basis to target or focus fair services geographically within Council's expansive service area. Another example is that the current and projected population characteristics indicate that a greater proportion of the population may have limited English speaking proficiency.

And, fifth, individual cities may extract information from the Fair Housing Community Profile to develop a city-specific profile that includes some or all of the characteristics included in Section 4 and Technical Appendix A.

The *Regional AI's* Fair Housing Community Profile presents an overview of the demographic characteristics of the 14 Entitlement Cities, the 14 Urban County Cities and unincorporated Orange County. The total population of the communities included in the *Regional AI* is almost 2,700,000 persons. The housing stock is comprised of about 873,600 housing units. The Profile contains information on the following:

- Population and Housing Characteristics
- Population Growth in Orange County
- Population Characteristics of the Protected Classes
- Household Income Characteristics

Three Technical Appendices include the detailed tables referenced in Section 4:

- Technical Appendix A – Fair Housing Community Profile
- Technical Appendix B – Minority Population by Census Tract

- Technical Appendix C – Low Income Population by Census Tract and Block Group

B. POPULATION AND HOUSING CHARACTERISTICS

1. Population

a. 2010 Population

Table A-1 in Technical Appendix A shows that the 2010 population of the Entitlement Cities is almost 2,105,300 persons. Santa Ana (357,754) and Anaheim (353,643) have the largest populations of the 14 Entitlement Cities. Five cities have populations between 138,610 and 217,686 (Fullerton, Garden Grove, Orange, Irvine and Huntington Beach). Seven cities have populations ranging between 58,741 and 94,294.

Table A-1 in Technical Appendix A also shows that the vast majority of people live in households; only a few people (1.6%) live in group quarters. The average household sizes range from a low of 2.21 (Newport Beach) to a high of 4.74 (Santa Ana).

Table A-2 in Technical Appendix A shows that the 2010 population of the Urban County is almost 594,000 persons. The unincorporated area comprises one-fifth (20.2%) of the total Urban County population. Of the 14 cities in the Urban County, two have populations of more than 50,000 (Placentia, Yorba Linda) and 12 have populations of less than 50,000.

Table A-2 in Technical Appendix A shows that 99.2% of the Urban County population lives in households. The average household sizes range from a low of 1.47 (Laguna Woods) to a high of 3.58 (Stanton).

Attachment A on pages A-28 and A-29 contains definitions of population related terms.

b. Population Growth Trends

Table A-3 in Technical Appendix A shows that during the 10-year period between the April 1990 and April 2000 Censuses, about 266,200 persons were added to the populations of 13 of the 14 Entitlement Cities. The City of Lake Forest was unincorporated in 1990. Additionally, the City of Rancho Santa Margarita was a Census Division Place (CDP) and not an incorporated city at the time of the 1990 Census. Thus, 1990 data for this city is based on the CDP population.

Table A-3 in Technical Appendix A indicates that almost 230,450 persons were added to the populations of the Entitlement Cities between the April 2000 Census and January 1, 2010. The largest *numerical gains* between 2000 and 2010 were experienced in Irvine (74,614), Anaheim (25,269) and Lake Forest (20,013). In fact, these three cities accounted for 52% of the total population growth of the 14 Entitlement Cities. In the same period, the highest population growth *rates* occurred in Irvine (52%), Lake Forest (34%), and Newport Beach (24%). The Newport Beach growth rate was not due to the occupancy of newly built housing, but rather to the annexation of the existing communities of Del Mar and Santa Ana Heights.

Table A-4 in Technical Appendix A shows the growth trends for the Urban County. As of January 1, 2010, the Urban County population was almost 594,000 persons.

Three of the 14 Urban County Cities were unincorporated at the time of the 1990 Census (Aliso Viejo, Laguna Hills and Laguna Woods). Only Aliso Viejo was unincorporated when the Census 2000 was taken. Table A-4 shows that the highest numerical population increases for the 11 cities incorporated at the time of the 1990 and 2000 Censuses occurred in Stanton (6,912), Yorba Linda (6,496) and Placentia (5,229). These cities also had the highest percentage increases at 22.7%, 12.4% and 12.7% respectively. Between the April 2000 Census and January 2010, the highest numerical and percentage changes in population occurred in Yorba Linda (10,355, 17.6%), Placentia (5,817, 12.5%), Brea (4,967, 14.0%) and Laguna Hills (3,702, 12.4%).

2. Housing Characteristics

a. 2010 Housing Supply

Table A-5 in Technical Appendix A shows that as of January 2010 the housing supply of the Entitlement Cities was about 655,450 housing units. The cities of Anaheim (103,242), Irvine (81,011), Huntington Beach (78,060), and Santa Ana (75,943) have the largest housing stocks. Single-family detached dwellings comprise slightly less than one half (48%) of housing units for the 14 Entitlement Cities. However, in nine of the 14 Entitlement Cities single family detached homes comprise the majority of the housing stock. The lowest percentage of single family detached homes occurred in Irvine (35%) while Fountain Valley had the highest (66%)

Table A-6 in Technical Appendix A shows that the Urban County's housing stock is comprised of about 218,160 dwelling units. Of the incorporated cities, Yorba Linda (22,103) and Aliso Viejo (18,207) have the largest housing supplies among the Urban County Cities. Unincorporated Orange County has about 38,500 housing units.

b. Housing Growth Trends

Lake Forest was unincorporated at the time of the 1990 Census. Regarding the remaining 13 incorporated cities, Table A-7 in Technical Appendix A shows that between 1990 and 2000 almost 43,800 housing units were added to housing stock of those cities. Irvine, by far, had the highest housing growth, adding 11,490 (27.2%) dwellings between 1990 and 2000. Between the April 2000 Census and January 1, 2010, the cities of Irvine (27,300, 33.7%), Newport Beach (6,227, 14.3%) and Lake Forest (5,898, 22.4%) had the largest increases in the housing stock. Rancho Santa Margarita had an increase of some 234%; however, it must be noted that it was a Census Division Place and not an incorporated city at the time of the 1990 Census

Changing boundaries and incorporations make trend analysis difficult. However, the 2010 housing supply estimate for the Urban County is 218,158 dwellings. Between the 1990 and 2000 censuses, two cities (Yorba Linda and Placentia) had growth rates above 10%. From the April 2000 Census to January 1, 2010 only Yorba Linda had a growth rate over 10%.

Yorba Linda has the largest housing stock at 22,103 units, while Villa Park has the smallest at 2,023. Single-family detached homes comprise about 55.6% of the housing stock in the 14 Urban County cities and the unincorporated area of Orange County. However, on a city-by-city basis it varies widely. Only about 5% of the housing stock in Laguna Woods is comprised of single family detached units. On the other hand, nearly 99% of Villa Park's housing stock is single family detached dwellings.

Table A-8 in Technical Appendix A provides the more detailed data.

Attachment A on page A-28 contains definitions of housing related terms.

c. Vacancy Rates

Vacancy rates reflect the supply/demand conditions that are unique to each community. Irvine has a 4.52% vacancy rate, which may be due to a significant portion (40%) of its housing stock comprised of multiple family (5+ units) and unsold housing inventory. Newport Beach has a high vacancy rate at 10.87%. This may be due to 24% of its stock being comprised of multiple family units in addition to vacation, second home and seasonal use of the housing stock.

Some of the higher vacancy rates of Urban County communities reflect beach and retirement communities. Four cities, for instance, have higher than average vacancy rates: Laguna Beach, 11.2%; Seal Beach, 8.2%; Dana Point, 7.8%; and Laguna Woods, 7.6%.

C. POPULATION GROWTH IN ORANGE COUNTY

1. Population by Race and Ethnicity

The racial and ethnic composition of Orange County's population has been experiencing dramatic change for the past 40 years but has recently passed a major milestone. In 2000, Whites accounted for more than 50% of Orange County's population. By 2007, the White population accounted for 43.6% of Orange County's population and it is now a minority-majority county. Orange County's Hispanic population has now passed the one-million mark and has grown from 30.9% of the population to 35% of the population. The Asian population has also experienced rapid growth. In 2000, the Asian population stood at 395,994 representing 13.8 % of Orange County's population and in 2007 reached 520,401 representing 16.8% of the county's population. Both the Black population and those classified as "All Other Races" have experienced some growth since 2000. Refer to Table 4-1.

Table 4-1
Orange County Population by Race and Ethnicity – 2000 and 2007

Race/Ethnicity	2000		2007	
	Number	Percent	Number	Percent
Asian	395,994	13.8%	520,401	16.8%
Black	44,191	1.5%	50,556	1.6%
Hispanic	885,377	30.9%	1,084,628	35.0%
White	1,475,045	51.5%	1,348,422	43.6%
All Other Races	62,761	2.2%	90,865	2.9%
Total	2,863,368	100.0%	3,094,872	100.0%

Source: California State Department of Finance
Table construction by Castañeda & Associates

Population change is the result of three factors: births, deaths, and migration. The White population in Orange County has decreased since 2000, because the number of births just slightly exceeded number of deaths by approximately 3,000, while at the same time, the number

of Whites moving out of Orange County exceeded the number of Whites moving into Orange County by 129,805. The net result was that the White population declined by 126,623.

On the other hand, the Hispanic population grew by 157,266 due to births and another 55,144 due to migration, while the total number of deaths was 13,159. The net result was that the Hispanic population grew by nearly 200,000 persons between 2000 and 2007. The pattern of growth for Asians is somewhat different than it is for Hispanics. Migration is the major factor for Asian population increase, while births are the major factor for Hispanic population increase. Between 2000 and 2007, the Asian population grew by 95,388 due to migration, while it added just fewer than 30,000 persons through natural increase (births minus deaths). Refer to Table 4-2.

Table 4-2
Components of Population Change
By Race and Ethnicity – 2000 and 2007

Race/Ethnicity	Births	Deaths	Net-Migration	Net Change
Asian	38,610	9,591	95,388	124,407
Black	2,505	1,459	5,319	6,365
Hispanic	157,266	13,159	55,144	199,251
White	96,375	93,193	-129,805	-126,623
All Other Races	19,058	773	9,799	28,084
Total	313,814	118,175	35,845	231,484

Source: California State Department of Finance
Table construction by Castañeda & Associates

2. Projected Population

As Orange County's remaining developable land is consumed, the level of growth will moderate each decade. However, some of the demographic trends that have marked the first decade of the twenty-first century will continue. The Hispanic population will nearly double by 2030 from 2000. Between 2010 and 2020 it will surpass the size of the White population and will be the largest population group in the county. The same factors that have marked change from 2000 to 2007 will also influence the change in the Hispanic population. Even though the Hispanic fertility will decline, numerically higher levels of births will increase the population while migration will play a significant role, but a secondary role, in its growth.

The Asian population will also experience significant growth between 2000 and 2030, adding 283,656 persons to its population. Migration will play a larger role than fertility. The fertility rates of Asians have been diverse depending on the Asian group. It is anticipated that rates for those groups with higher fertility rates presently will decline. Thus, the number of Asian births is also expected to decline. Refer to Table 4-3 on the next page.

Continued declines for the White population can be attributed to the overall aging of the White population. First of all, the number of persons in child bearing ages will decline. Even with constant fertility rates, the number of births will decline. Second of all, the overall level of mortality will rise as the population gets older. Whites are also expected to experience a net out-migration, thus resulting in further declines in their population.

Table 4-3
Orange County
Population and Race Projections
2000 to 2030

Year	Total	Asian	Black	Hispanic	White	All Other Races
2000	2,863,834	395,994	44,191	885,377	1,475,045	62,761
2010	3,227,836	517,787	44,873	1,158,270	1,419,887	87,019
2020	3,520,265	616,929	43,893	1,465,316	1,294,712	99,415
2030	3,705,322	679,650	40,410	1,765,105	1,107,029	113,128
Numerical Change	841,488	283,656	-3,781	879,728	-368,016	50,367
Percent Change	29.4%	71.6%	-8.6%	99.4%	-24.9%	80.3%

Source: State of California, Department of Finance, *Population Projections for California and Its Counties 2000-2050*, Sacramento, California, July 2007

Table construction by Castañeda & Associates

Although their impact on the population will not be as great as that of Asians, Hispanics and Whites, the Black population will decline while the population of "All Other Races" will increase. The factors that will influence the change in the White population are the same that will influence the decline in the Black population. For those classified as "All Other Races," it is births that will result in the population increase. The underlying factor will be more interracial couples having children as Orange County's population becomes more racially and ethnically diverse.

3. Housing Needs

Immigration has been and will continue to influence Orange County's population change. It is expected that most of the immigrants settling in Orange County will come from the same areas of the globe as those that now reside in the county: Asia and Central America. They will probably share similar characteristics as today's immigrants. They will be younger, have lower levels of education, have higher poverty rates, and have lower levels of English proficiency. Thus, the need for programs that assist immigrants in helping to provide safe and adequate housing will still persist, including fair housing services.

D. POPULATION CHARACTERISTICS OF THE PROTECTED CLASSES

The Fair Housing Act, 42 U.S.C. 3601 et. seq., prohibits discriminatory practices which make housing unavailable to persons because of:

- Race
- Color
- Religion
- Sex
- National Origin
- Familial Status or
- Handicap/Disability

The California Fair Employment and Housing Act (Article 2, Section 12955) makes it unlawful:

to discriminate against or harass any person because of the race, color, religion, sex, sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability of that person.

Under the provisions of Civil Code Section 51.2 et. seq. age is a protected class.

Hence, the California law has added the following to the group of protected classes:

- Sexual Orientation
- Marital Status
- Ancestry
- Source of Income
- Age

The Unruh Civil Rights Act, California Civil Code sections 51 through 51.3, provides protection from discrimination by all business establishments in California, including housing and public accommodations. The Unruh Civil Rights Act specifically outlaws discrimination in housing and public accommodations based on sex, race, color, religion, ancestry, national origin, disability, or medical condition. While the Unruh Civil Rights Act specifically lists “sex, race, color, religion, ancestry, national origin, disability, or medical condition” as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics. The Act is meant to cover all arbitrary and intentional discrimination by a business establishment on the basis of personal characteristics similar to those listed above.

Part D presents demographic data on the following protected classes: race/color, sex, national origin/ancestry, familial status, handicap/disability, and marital status. Table 4-4 on the next page is a summary of the demographic characteristics of the protected classes. The data on the number and percentage of housing discrimination complaints is based on the five year period from 2005 through 2009 as compiled for the *Regional AI* by the State Department of Fair Employment and Housing. The housing discrimination data are discussed in more detail in Section 5.

Table 4-4
Regional Analysis of Fair Housing Impediments
Characteristics of the Protected Classes

Protected Class	Demographic Characteristics	Number of Housing Discrimination Complaints	Percent of All Housing Discrimination Complaints
Race/Color	Population of 3,119,500 in Orange County: 45.9% is White Alone; 54.1% is Minority	76 of 372	20.4%
Sex	209,600 female householders live in <i>Regional AI</i> area; 146,700 male householders live in <i>Regional AI</i> area. Estimates exclude married householders.	20 of 372	5.4%
National Origin/Ancestry	County's foreign born population is 936,000, which represents 30% of the total population. Vast majority of foreign born population is from Latin America and Asia.	53 of 372	14.2%
Familial Status	Almost 280,000 families with children live in the <i>Regional AI</i> area – almost 30% of the families (80,000) reside in Anaheim and Santa Ana.	45 of 372	12.1%
Handicap/Disability	140,000 disabled persons reside in Entitlement Cities; 7.4% of non-institutionalized population is disabled. 98,900 disabled persons live outside the Entitlement Cities; 8.1% of non-institutionalized population is disabled.	129 of 372	34.7%
Marital Status	About 339,000 married couples live in Entitlement Cities; 54% of all households. About 81,200 married couples live in Urban County Cities; 55% of all households.	15 of 372	4.0%

1. Race/Color

During the 2005 through 2009 period, race/color was the basis for 20% of all housing discrimination complaints filed by residents of the cities covered by the *Regional AI*, according to statistics compiled by the State Department of Fair Employment and Housing (DFEH). The State Department of Justice (DOJ) reports that during the 2004 through 2008 period race/ethnicity/national origin was the bias motivation in about two-thirds of all hate crime events. Hate crime events with an anti-Black and anti-Hispanic bias motivation accounted for 34.6% and 10.7% respectively of all hate crime events in California during the five-year period.

a. Race Categories and Definitions

1) *Race Categories*: The Fair Housing Act does not define race. Data on race is required for many federal programs and the Census Bureau collects race data in accordance with guidelines provided by the U.S. Office of Management and Budget (OMB) and these data are based on self-identification. The racial categories included in the census form generally reflect a *social definition* of race recognized in this country, and are not an attempt to define race biologically, anthropologically or genetically. In addition, the Census Bureau recognizes that the categories of the race item include both racial and *national origin* or socio-cultural groups. Census 2010 and the *American Community Survey* provide for six race categories:

- White Alone
- Black, African American or Negro Alone
- American Indian or Alaska Native Alone
- Asian Alone
- Native Hawaiian or Other Pacific Islander Alone
- Some Other Race Alone

Individuals who chose more than one of the six race categories are referred to as the *Two or more races* population, or as the group that reported *more than one* race. All respondents who indicated more than one race can be collapsed into the *Two or more races* category, which combined with the six *alone* categories, yields seven mutually exclusive and exhaustive categories.

Thus, the six race *alone* categories and the *Two or more races* category sum to the total population.

2) *Race Category and Hispanic Definitions*: Census 2000 adheres to the federal standards for collecting and presenting data on race and Hispanic origin as established by the Office of Management and Budget (OMB) Policy Directive No. 15 (May 12, 1977) and the revisions published in the Federal Register Notice on October 30, 1997 – Revisions to the Standards for the Classification of Federal Data on Race and Ethnicity. The OMB's efforts are to standardize the racial and ethnic categories so that federal government agencies can monitor discrimination, as required by the Civil Rights Act of 1964, the Voting Rights Act of 1965, the Fair Housing Act of 1968, the Equal Credit Opportunity Act of 1974, and the Home Mortgage Disclosure Act of 1975.

Source: Victoria Hattam, "Ethnicity & the American Boundaries of Race: Rereading Directive 15," *Daedalus – Journal of the American Academy of the Arts & Sciences*, Winter 2005, pgs. 61-62.

The Census 2000 race and Hispanic definitions are given below:

White – A person having origins in any of the original peoples of Europe, the Middle East, or North Africa. It includes people who indicate their race as “White” or report entries such as Irish, German, Italian, Lebanese, Near Easterner, Arab, or Polish.

Black or African American – A person having origins in any of the Black racial groups of Africa. It includes people who indicate their race as “Black, African American or Negro”, or provide written entries such as African American, Afro-American, Nigerian, or Haitian.

American Indian or Alaska Native – A person having origins in any of the original peoples of North and South America (including Central America) and who maintain tribal affiliation or community attachment. People who classified themselves as “American Indian or Alaska Native” were asked to report their enrolled or principal tribe.

Asian – A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam. It includes “Asian Indian,” “Chinese,” “Filipino,” “Korean,” “Japanese,” “Vietnamese,” or “Other Asian.”

Native Hawaiian and Other Pacific Islander – A person having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands. It includes people who indicated their race as “Native Hawaiian,” “Guamanian or Chamorro,” “Samoan,” and other “Pacific Islander.”

Some Other Race – Includes all other responses not included in the above race categories. Respondents providing write-in entries such as multiracial, mixed, interracial, or a Hispanic/Latino group (for example, Mexican, Puerto Rican, or Cuban) in the “Some other race” write-in space are included in this category.

According to Census 2000, the terms “Hispanic,” “Latino,” and “Spanish” are used interchangeably. Hispanic or Latino origin include people who classify themselves in one of the specific Hispanic or Latino categories listed on the Census 2000 questionnaire – “Mexican,” “Puerto Rican,” or “Cuban” – as well as those who indicate that they are of “another Hispanic, Latino, or Spanish origin.” People in the latter group include those whose origins are from Spain, the Spanish-speaking countries of Central or South America, the Dominican Republic, or people identifying themselves generally as Spanish, Spanish-American, Hispanic, Hispano, Latino, and so on.

In data collection and presentation, federal agencies are required to use a minimum of two ethnicities – “Hispanic or Latino” and “Not Hispanic or Latino.”

b. Non-Hispanic White and Minority Population Characteristics

The racial and ethnic groups comprising the “minority” populations are defined in essentially the same way by the Federal Office of Management and Budget, Department of Transportation, Federal Financial Institutions Examination Council (HMDA data), and Council on Environmental Quality (environmental justice guidelines). For instance, the FFIEC, for purposes of HMDA data collection, states that:

“...the percentage minority population means, for a particular census tract, the percentage of persons of minority races and whites of Hispanic or Latino Origin, in relation to the census tract’s total population.”

The CEQ environmental justice guidelines provide the following definition:

“Minority individuals – Individuals who are members of the following population groups: Hispanic or Latino, American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, multiracial minority (two or more races, at least one of which is a minority race).”

The non-minority population is White, Non-Hispanic or Latino.

Table 4-5 shows Orange County’s 2000 and 2008 population by Hispanic/Latino and seven race categories. During the eight year period, there was a net decrease in the White alone population and this race category now comprises less than one-half (46%) of the County’s population. The Hispanic and Asian populations comprise 33.8% and 16.1% respectively of the County’s population. All other minority populations equal 4.2% of Orange County’s population.

Table 4-5
Orange County
Population by Hispanic/Latino and Race-2000 and 2008

Hispanic/Latino or Race	2000		Mid-Year 2008		Numerical Change	Percent Change
	Number	Percent	Number	Percent		
Hispanic or Latino (of any race)	875,579	30.8%	1,054,375	33.8%	189,209	21.6%
White alone	1,458,978	51.3%	1,431,829	45.9%	-13,009	-0.9%
Black or African American alone	42,639	1.5%	49,911	1.6%	7,765	18.2%
American Indian and Alaska Native alone	8,414	0.3%	9,358	0.3%	1,037	12.3%
Asian alone	383,810	13.5%	502,232	16.1%	123,382	32.1%
Native Hawaiian and Other Pacific Islander alone	8,086	0.3%	9,358	0.3%	1,365	16.9%
Some other race alone	4,525	0.2%	9,358	0.3%	4,926	108.9%
Two or more races	64,258	2.3%	53,031	1.7%	-10,704	-16.7%
Total	2,846,289	100.0%	3,119,452	100.0%	303,970	10.7%

Note: The mid-year number is derived from applying the ACS 1-Year Estimates to an average of the total population numbers from California Department of Finance (DOF) for January 1, 2008 and January 1, 2009

Source: *American Community Survey 1-Year Estimate, 2008: Select Demographic Characteristics. Census 2000, Summary File 1, Table P4 Hispanic or Latino by Race, Not Hispanic or Latino*

Table construction by Castañeda & Associates

Between 2000 and 2008, Orange County’s population increased by nearly 304,000 people. Two population groups accounted for most of the growth: Hispanic or Latino of any race (189,209) and Asian alone (123,382).

c. Hispanic Population Growth Trends

According to the State Department of Finance, the Hispanic share of Orange County's total population increased from 30.9% in 2000 to 35% in 2007. The *American Community Survey* estimates that the Hispanic population comprised 33.8% of the County's population in 2008. The Hispanic population will nearly double by 2030 from the 2000 level. Between 2010 and 2020 it will surpass the size of the White alone population and will be the majority population group in the county.

Entitlement Cities vary greatly in terms of growth trends and their 2008 racial and ethnic compositions. Table A-9 in Technical Appendix A provides the following information:

- Population by race and Hispanic or Latino in 2000 and 2008
- Percentage of the total population by race and Hispanic or Latino in 2000 and 2008
- Numerical change by race and Hispanic or Latino in 2000 and 2008
- Percentage change by race and Hispanic or Latino in 2000 and 2008

The Entitlement Cities with the largest Hispanic populations are noted below:

<u>City</u>	<u>Hispanic Population Total</u>	<u>Percent of Total City Population</u>
Santa Ana	284,234	80.5%
Anaheim	187,122	54.0%
Garden Grove	69,476	40.1%
Orange	56,037	39.8%
Fullerton	44,988	32.8%

Table A-10 in Technical Appendix A contains Hispanic population data for the Urban County Cities. The Urban County Cities with the largest Hispanic populations are noted below:

<u>City</u>	<u>Hispanic Population Total</u>	<u>Percent of Total City Population</u>
Stanton	19,743	50.3%
Placentia	19,664	38.1%

d. Asian Population Growth Trends

The Asian population will experience significant growth between 2000 and 2030, adding 283,656 persons to its population. Migration will play a larger role in population growth than fertility. The Entitlement Cities with the largest Asian populations are listed below and on the next page.

<u>City</u>	<u>Asian Population Total</u>	<u>Percent of Total City Population</u>
Irvine	75,844	36.1%
Garden Grove	58,215	33.6%
Anaheim	46,087	13.3%

<u>City</u>	<u>Asian Population Total</u>	<u>Percent of Total City Population</u>
Westminster	38,112	41.0%
Fullerton	29,489	21.5%
Santa Ana	29,306	8.3%

Table A-10 in Technical Appendix A contains Asian population data for the Urban County Cities. The Urban County Cities with the largest Asian populations are noted below:

<u>City</u>	<u>Asian Population Total</u>	<u>Percent of Total City Population</u>
Cypress	13,842	28.0%
Yorba Linda	9,390	13.8%
Stanton	8,007	20.4%

e. Black Population Growth Trends

Between 2000 and 2007 Orange County's Black population increased by nearly 6,400 persons. However, this population group is projected to decrease by almost 3,800 persons between 2000 and 2030. The population decline will be due to fewer births, higher mortality and net out-migration from the County.

The Entitlement Cities with the largest Black populations are noted below:

<u>City</u>	<u>Black Population Total</u>	<u>Percent of Total City Population</u>
Anaheim	10,049	2.9%
Fullerton	5,486	4.0%
Santa Ana	3,885	1.1%

Table A-10 in Technical Appendix A contains Black population data for the Urban County Cities. The Urban County Cities with a Black population of more than 1,000 persons include Aliso Viejo, Cypress, Stanton and Yorba Linda.

f. Areas of Minority Population Concentrations

Census 2010 and 2008 *American Community Survey* data are unavailable at the census tract level. Thus, Technical Appendix B presents the race and ethnicity of the population residing in the Entitlement Cities and Urban County's 252 census tracts based on Census 2000 data. In 2000, "minority" persons comprised 45.3% of the County's population. The census tracts were grouped according to five intervals:

- 0.0-20.0%
- 20.1-45.3%
- 45.4-60.0%
- 60.1-80.0%
- 80.1-100.0%

Table 4-6 shows that 64 census tracts had “minority” population percentages greater than 80%. Thirty-seven of the 64 census tracts are located in Santa Ana. Anaheim had 11 census tracts and Garden Grove had four census tracts exceeding the 80% threshold. Therefore, just over four-fifths of the census tracts with “high” minority population concentrations are located in these three large cities of Orange County.

Ten of the 64 census tracts are split tracts – that is, the tract boundaries are located in two cities. Three of the 10 split tracts are located in Santa Ana/Garden Grove. Table 4-7 lists the 10 split census tracts and the population living in each city.

Ninety-four census tracts had “minority” population percentages ranging between 60% and 80%. Twenty of the census tracts are located in Anaheim and 13 are located in Garden Grove. Santa Ana and Westminster each have eight census tracts with minority populations ranging between 60% and 80%. Forty-five census tracts are located in other Orange County cities.

Table 4-6
Regional Analysis of Fair Housing Impediments
Areas of Minority Population Concentrations
Number of Census Tracts by City/Area - 2000

City/Area	Census Tract Minority Population Percentages	
	80.1%-100.0%	60.1%-80.0%
Santa Ana	37	8
Anaheim	11	20
Garden Grove	4	13
Santa Ana/Garden Grove	3	1
Stanton	1	2
Buena Park	1	4
Santa Ana/Tustin	1	0
Santa Ana/Fountain Valley	1	0
Anaheim/Placentia	1	1
Anaheim/Stanton	1	1
Anaheim/Fullerton	1	0
Garden Grove/Westminster	1	1
La Habra/Unincorporated	1	0
Fullerton	0	6
Westminster	0	8
La Habra	0	4
La Palma	0	2
Orange	0	3
Irvine	0	1
Huntington Beach	0	1
Seal Beach	0	1
Cypress	0	1
Placentia	0	1
Other ¹	0	15
Total Census Tracts	64	94

¹Includes split Census Tracts between two and three jurisdictions.

Source: Technical Appendix B

Table construction by Castañeda & Associates

Table 4-7
Regional Analysis of Fair Housing Impediments
List and Characteristics of Split Census Tracts
With 80.1%+ Minority Population

Census Tract	City	Total Population	Percent Minority
744.07	Santa Ana	3,822	98.56%
	Tustin	3,865	98.52%
	Total	7,687	92.55%
117.2	Placentia	5,339	93.73%
	Anaheim	2,196	89.66%
	Total	7,535	92.54%
891.04	Garden Grove	3,687	93.38%
	Santa Ana	2,387	91.41%
	Total	6,074	92.31%
12.01	La Habra	7,974	80.76%
	County	397	91.44%
	Total	8,371	81.55%
889.03	Garden Grove	6,656	84.84%
	Santa Ana	1,938	88.85%
	Total	8,594	85.75%
878.03	Stanton	4,821	88.76%
	Anaheim	1,621	80.26%
	Total	6,442	86.62%
116.02	Fullerton	3,306	86.48%
	Anaheim	2,456	77.89%
	Total	5,762	82.82%
992.02	Santa Ana	7,232	85.26%
	Fountain Valley	885	62.03%
	Total	8,117	82.23%
889.04	Westminster	5,142	82.52%
	Garden Grove	667	78.41%
	Total	5,809	82.05%
891.02	Garden Grove	4,418	82.01%
	Santa Ana	2,536	80.80%
	Total	6,954	81.56%

Source: California Department of Finance, Demographic Research Unit, Census 2000, Summary File 1, Population by Race/Ethnicity for Split Tracts in Orange County
Table construction by Castañeda & Associates

2. Sex (of Householder)

In the sale and rental of housing, fair housing laws protect several “classes” from discrimination. State and federal fair housing laws prohibit discrimination based a person’s based sex.

During the 2005 through 2009 period, “sex” was the basis for 5% of all housing discrimination complaints filed by residents of the cities covered by the *Regional AI*, according to statistics provided by the State DFEH to the FHCOC. The State DOJ reports that during the 2004 to 2008 period, “gender” was the bias motivation of 1.2% of all hate crime events. The DOJ also reports that “sexual orientation” was the bias motivation of 18.9% of all hate crime events.

In Technical Appendix A, Tables A-11 and A-12 present estimates of the sex of householders for the Entitlement Cities and Urban County Cities. The estimates in the two tables are for:

- *Married-couple family*. This category includes a family in which the householder and his or her spouse are enumerated as members of the same household.
- *Male householder, no wife present*. This category includes a family with a male maintaining a household with no wife of the householder present.
- *Female householder, no husband present*. This category includes a family with a female maintaining a household with no husband of the householder present.
- *Nonfamily household*. This category includes a householder living alone or with nonrelatives only.

The above are Census 2000 definitions of each household type.

Table 4-8 on the next page summarizes male and female householders for the Entitlement Cities and Urban County Cities. The counts *exclude* married couple families as homes are typically owned or rented in both spouses’ names. The number of non-family householders – those who live alone or with nonrelatives – exceeds the number of family householders. The sex of the non-family householders was based on the Census 2000 ratios of 46% male and 54% female.

Excluding married couples, there are an estimated 356,300 householders of which 59% (209,610) are female and 41% (146,709) are male. Female non-family householders – living alone or with nonrelatives - comprise about one-third of all householders.

In Table 4-8, the Urban County numbers are only for the cities that have *American Community Survey* data and exclude the cities of Laguna Woods, La Palma, Los Alamitos and Villa Park all of which have populations of less than 20,000. The *American Community Survey* 3-Year estimates are available for cities having populations between 20,000 and 65,000 persons. *American Community Survey* data for cities with populations of less than 20,000 should be available in late 2010 or early 2011.

Table 4-8
Regional Analysis of Fair Housing Impediments
Estimated Sex of Householder – 2008

Location/Household Type	Male	Female	Total
Entitlement Cities			
Family	38,453	76,553	115,006
Non-Family	81,232	93,836	175,068
Sub-Total	119,685	170,389	290,074
Urban County			
Family	5,654	14,535	20,189
Non-Family	21,370	24,686	46,056
Sub-Total	27,024	39,221	66,245
Total	146,709	209,610	356,319

Source: Technical Appendix A, Tables A-11 and A-12
Table construction by Castañeda & Associates

The United States Department of Justice has stated:

The Fair Housing Act makes it unlawful to discriminate in housing on the basis of sex. In recent years, the Department's focus in this area has been to challenge sexual harassment in housing. Women, particularly those who are poor, and with limited housing options, often have little recourse but to tolerate the humiliation and degradation of sexual harassment or risk having their families and themselves removed from their homes.

In addition, pricing discrimination in mortgage lending may also adversely affect women, particularly minority women. This type of discrimination is unlawful under both the Fair Housing Act and the Equal Credit Opportunity Act.

Source: United States Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, *The Fair Housing Act*, July 25, 2008, pages 2 and 3

During the 2005-2009 period, harassment accounted for 15.9% of all alleged housing discriminatory acts in the jurisdictions covered by the *Regional AI*.

3. National Origin/Ancestry

The Fair Housing Act and California Fair Employment and Housing Act prohibit discrimination based upon national origin. According to the United States Department of Justice, such discrimination can be based either upon the country of an individual's birth or where his or her ancestors originated. During the 2005 through 2009 period, "national origin" was the basis for 14% of all housing discrimination complaints filed by residents of the cities covered by the *Regional AI*, according to statistics provided by the State DFEH. The DFEH data reveal that the national origin housing discrimination complaints included 16 countries; for instance, anti-South Korea or anti-Romania. However, anti-Mexico accounted for 58% of all national origin housing discrimination complaints.

Table 4-9 shows that the vast majority (70%) of the county's population was born in the United States, Puerto Rico, a United States Island Area or abroad to American parents. Thus, 30% of the county's inhabitants are foreign-born. Orange County's foreign born population totals almost 936,000 people. The largest portions of the foreign-born population come from Latin America or Asia, which together account for more than 90% of the foreign-born population.

Table 4-9
Orange County: Place of Birth and National Origin – 2008

Place of Birth/National Origin	Number	Percent
Born in the United States	2,152,421	69.0%
Born in Puerto Rico, U.S. Island Area or Born Abroad to American Parent(s)	31,195	1.0%
Foreign Born		
Europe	53,031	1.7%
Asia	380,573	12.2%
Africa	12,478	0.4%
Oceania	3,119	0.1%
Latin America	474,157	15.2%
North America	12,478	0.4%
Subtotal	935,836	30.0%
Total	3,119,452	100.0%

Source: 2008 *American Community Survey* 1-Year Estimates Selected Social Characteristics. Midpoint of 2008 and 2009 California Department of Finance (DOF) Population Estimates
Table construction by Castañeda & Associates

Data on a city-by-city basis is limited from the *American Community Survey*. However, data was available for three of the Entitlement Cities (Anaheim, Huntington Beach and Irvine). These three cities have a total foreign-born population of 231,148 persons. Table 4-10 shows that Irvine has nearly 15% of the population that was born in Asia. Anaheim has about 18% of the population that was born in Latin America.

Table 4-10
Orange County: City Residence of Foreign Born Population from Asia and Latin American – 2008

Location	Total Population	Total Foreign Born	Percent of the County	Born in Asia	Percent of the County	Born in Latin America	Percent of the County
Anaheim	346,908	128,628	13.7%	33,983	8.9%	86,702	18.3%
Huntington Beach	201,804	31,445	3.4%	16,047	4.2%	7,845	1.7%
Irvine	210,321	71,075	7.6%	56,391	14.8%	5,104	1.1%
Other	2,360,419	704,688	75.3%	274,152	72.1%	374,506	78.9%
Orange County Total	3,119,452	935,836	100.0%	380,573	100.0%	474,157	15.1%

Source: 2008 *American Community Survey* 1-Year Estimates Selected Social Characteristics for Anaheim, Huntington Beach, Irvine and Orange County. Midpoint of 2008 and 2009 California Department of Finance (DOF) Population Estimates

Table construction by Castañeda & Associates

4. Familial Status

The Fair Housing Amendments Act of 1988 prohibits discriminatory housing practices based on familial status. In most instances, according to the United States Department of Justice, the Act prohibits a housing provider from refusing to rent or sell to families with children. However, housing may be designated as Housing for Older Persons (55 years + of age). This type of housing, which meets the standards set forth in the Housing for Older Persons Act of 1995, may operate as “senior housing” and exclude families with children.

The Act protects families with children less than 18 years of age, pregnant women, or families in the process of securing custody of a child under 18 years of age. The Department of Justice has stated:

In addition to prohibiting the outright denial of housing to families with children, the Act also prevents housing providers from imposing any special requirements or conditions on tenants with children. For example, landlords may not locate families with children in any single portion of a complex, place an unreasonable restriction on the number of persons who may reside in a dwelling, or limit their access to recreational services provided to other tenants.

Source: United States Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, *The Fair Housing Act*, July 25, 2008, page 3

In Orange County, complaints filed on the bases of familial status comprise 12% of all complaints filed with the State DFEH during the 2005-2009 period.

Numerically speaking, families with children are a large fair housing protected class. The Entitlement Cities have a combined total of 233,726 families with children. Table A-13 in Technical Appendix A shows, however, that families with children in the Entitlement Cities comprise less than one-half of all householders except in the City of Santa Ana. Stated another way, Santa Ana is the only Entitlement City where families with children comprise a majority (51.3%) of all households. Anaheim, Buena Park and Rancho Santa Margarita are the only other cities where families with children comprise 40% or more of all households.

The same pattern is true for the Urban County communities, as Table A-14 in Technical Appendix A shows. For the cities where data is available, none have families with children comprising more than 40% of all households. In fact, two cities, Laguna Beach and Seal Beach, have very low percentages of families with children with 17.2% and 11.8% respectively.

Overall, in the area covered by the *Regional AI* there are an estimated 279,917 families with children:

- Entitlement Cities 233,726
- Urban County* 46,191

*Excludes the cities of Laguna Woods, La Palma, Los Alamitos and Villa Park

Anaheim and Santa Ana are home to almost 30% of all the families with children living in the combined area of the Entitlement Cities and Urban County Cities.

There are nearly 39,400 and 7,200 female householders with children residing in the Entitlement Cities and Urban County Cities, respectively. Tables A-15 and A-16 in Technical Appendix A show that female householders with children less than 18 years of age experience high poverty rates. Many of these householders will have difficulty finding adequate housing not only because of their poverty incomes but also due to housing discrimination against women and/or families with children.

5. Handicap/Disability

a. Background

The Fair Housing Amendments Act of 1988 prohibits discriminatory housing practices based on handicap/disability status in all types of housing transactions. Among other prohibitions, the Act is intended to prohibit the application of special restrictive covenants and conditional or special use permits that have the effect of limiting the ability of such individuals to live in the residence of their choice. Fair housing laws, therefore, make it illegal to deny a housing opportunity on the basis of disabilities.

In addition, the law prohibits applying one standard to one class of individuals while applying a different standard to another class of individuals. For example, it would be illegal to ask a disabled individual applying for an apartment to provide a credit report if non-disabled applicants did not have to provide one.

In Orange County, complaints filed on the bases of disability status comprise 35% of all complaints filed with the State DFEH. A physical or mental disability bias motivation accounted for 0.2% of all hate crime events in California in 2008, according to the State DOJ.

Housing opportunities for disabled persons are impeded by practices in both the private and public sectors. For instance, “denied reasonable modification/accommodation” comprise 18.9% of the alleged acts cited in housing discrimination complaints. Additionally, apartment rental ads often state “no pets allowed,” even though disabled persons may have service or companion animals. In the public sector, housing opportunities can be impeded because a city has not adopted a reasonable accommodation procedure, or if adopted has not made the procedure widely known in the community.

The United States Department of Justice has indicated a major focus of its efforts is on public sector impediments that may restrict housing opportunities for disabled persons. The Department has stated:

The Division’s enforcement of the Fair Housing Act’s protections for persons with disabilities has concentrated on two major areas. One is insuring that zoning and other regulations concerning land use are not employed to hinder the residential choices of these individuals, including unnecessarily restricting communal, or congregate, residential arrangements, such as group homes. The second area is insuring that newly constructed multifamily housing is built in accordance with the Fair Housing Act’s accessibility requirements so that it is accessible to and usable by people with disabilities, and, in particular, those who use wheelchairs.

Source: United States Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, *The Fair Housing Act*, July 25, 2008, page 4

b. Disability Defined

The disabled are defined as persons with a physical or mental impairment which substantially limits one or more of such person's major life activities. People who have a history of, or are regarded, as having a physical or mental impairment that substantially limits one or more major life activities, are also covered by fair housing laws. It should be noted that California law does not include the term "substantially" with regard to "major life activities" and "impairments."

Major life activities include, but are not limited, to:

- Caring for one's self
- Walking
- Seeing
- Hearing
- Speaking
- Breathing
- Working
- Performing manual tasks
- Learning

Some examples of impairments, which may substantially limit major life activities, even with the help of medication or aids/devices, include, but are not limited, to:

- AIDS
- Alcoholism
- Blindness or visual impairment
- Cancer
- Deafness or hearing impairment
- Diabetes
- Drug addiction
- Heart disease
- Mental illness
- Paraplegia
- Multiple sclerosis

c. Disabled Population Estimates

The *2008 American Community Survey* asks questions regarding six types of disability:

- Hearing disability
- Vision disability
- Cognitive disability
- Mobility disability
- Self-care disability
- Independent living disability

The ACS disability questions differ from the Census 2000 and therefore cannot be compared to the decennial census results. In effect, the ACS data provide a benchmark for comparisons in the future. Data on disability status are available for all of Orange County and 11 of the 14 Entitlement Cities. However, no data are available for any of the Urban County Cities.

There are an estimated 238,900 disabled persons among Orange County's non-institutionalized population. The disability prevalence rate for the entire Orange County area is 7.7%, according to the 2008 *American Community Survey*.

Table 4-11 shows the disability status for 11 of the 14 Entitlement Cities participating in the *Regional AI*. According to the 2008 ACS estimates, there are almost 140,000 disabled persons residing in the 11 Entitlement Cities. The overall disability prevalence rate was 7.4%. Buena Park and Westminster had significantly higher rates at 11.1% and 11.8% respectively.

Based on the data in the preceding two paragraphs, it can be estimated that there are about 98,900 (238,900 minus 140,000) disabled persons residing in areas outside the boundaries of the 11 Entitlement Cities. The disability rate for areas outside the Entitlement Cities is 8.1%.

Table 4-11
Regional Analysis of Fair Housing Impediments
Disabled Population for Entitlement Cities - 2008

City	Non-Institutionalized Population¹	Disability Rate²	Number Disabled
Anaheim	345,618	7.9%	27,304
Buena Park	82,576	11.1%	9,166
Fountain Valley	57,322	NA	NA
Fullerton	136,282	7.0%	9,540
Garden Grove	172,737	9.1%	15,719
Huntington Beach	201,308	7.8%	15,702
Irvine	210,201	5.3%	11,141
La Habra	61,943	NA	NA
Lake Forest	77,602	6.0%	4,656
Newport Beach	84,815	5.2%	4,410
Orange	137,571	7.0%	9,630
Rancho Santa Margarita	49,435	NA	NA
Santa Ana	350,095	6.2%	21,706
Westminster	92,758	11.8%	10,945
Total³	1,891,563	7.4%	139,919

N/A means disability data are unavailable for these three cities.

¹Non-Institutionalized population is calculated from Census 2000 Summary File 1 (SF1), Table PCT16 "Group Quarters Population"

²Disability rate is from 2008 *American Community Survey* (ACS), Select Social Characteristics.

³Totals are for the cities where data are available and percentages are based on the total for known cities

Source: Census 2000, Summary File 1 (SF1), Table PCT Group Quarters Population.
 2008 *American Community Survey* (ACS) 1-Year Estimates, Select Social Characteristics
 State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2008 and January 1, 2009

Table construction by Castañeda & Associates

During the 2005 through 2009 period, “disability” was the basis for 35% of all housing discrimination complaints filed by residents of the jurisdictions covered by the *Regional AI*. Therefore, disabled persons represent a much larger share of complainants than of the general population. This may be due to a greater understanding by disabled persons of their fair housing rights than other protected classes.

6. Marital Status

California’s fair housing law prohibits housing discrimination on the basis of marital status. This basis refers to whether a person is married or not. The U.S. Census Bureau has four major “marital status” categories: never married, married, widowed, and divorced. These terms refer to the marital status at the time of the enumeration. A married couple includes a family in which the householder and his or her spouse are enumerated as members of the same household. The DFEH reports that 4% of the cases filed were discrimination complaints based marital status.

Table A-17 in Technical Appendix A shows that there are about 339,000 married couples residing in the Entitlement Cities, or about 54% of all households. Married couples comprise a majority of all households in 13 of the 14 Entitlement Cities. In Newport Beach less than 50% of the City’s households are married. In Fountain Valley and Rancho Santa Margarita more than 60% of all households are married couples.

Table A-18 in Technical Appendix A shows that there are about 81,200 married couples living in the Urban County Cities, or 55% of all households. Married couples are the majority of all households in eight of the 10 cities for which data are available. Married couples comprise more than 70% of all households residing in Yorba Linda and more than 60% of all households having a home in Cypress and Laguna Hills. Married couples comprise less than one-half of all households in Laguna Beach and Seal Beach.

E. HOUSEHOLD INCOME CHARACTERISTICS

‘Fair housing choice’, according to HUD, means the ability of persons of *similar income levels* regardless of race, color, religion, sex, national origin, handicap and familial status to have available to them the same housing choices. [emphasis added] This means, for instance, that households of different races but with similar income levels should have available to them the same housing choices. Another example is that female householders, male householders and married couples with similar income levels should have available to them the same housing choices. A housing market that treats female and male householders with incomes of \$60,000 *differently* would not be providing fair housing choice.

1. Median Household Income

According to Census 2000, the median household income is based on the total number of households including those with no income. The median divides the income distribution in two equal parts – one-half of the cases falling below the median and one-half above the median.

Table 4-12 on the next page shows the median household income for the following householders for each Entitlement City:

- Black or African American Alone Householder
- American Indian and Alaska Native Alone Householder
- Asian Alone Householder
- Native Hawaiian and Other Pacific Islander Alone Householder
- Some Other Race Alone Householder
- Two or More Races Householder
- Hispanic or Latino Householder
- White Alone, Not Hispanic or Latino Householder
- All Householders

The entries in Table 4-12 show that the Entitlement Cities differ from one another. The general patterns are:

- Non-Hispanic White households generally have among the highest median household income, generally ranking first, second or third among the various jurisdictions.
- The Asian population usually has slightly lower medians than the Non-Hispanic White householders, but typically rank first, second or third in the various cities.
- The householders with the lowest median incomes are the Black or African American householders and Hispanic householders.
- The Hispanic householders typically have incomes slightly higher the Black/African American householders.

Table 4-13 on page 4-26 shows the median household income for the Urban County Cities. The general patterns are:

- On the whole, the median incomes of each racial/ethnic category are higher in the Urban County as compared to the Entitlement Cities.
- The relative ranks of each race/ethnic category show more variation than among the Entitlement Cities. For instance, the Non Hispanic White householders rank the highest in only two of the 14 jurisdictions. The Asian and Black/African American householders rank among the highest median income householders in most communities.
- The median income of Hispanic householders is generally higher in the Urban County compared to the Entitlement Cities.
- Cities with a large percentage of retirees, such as Laguna Woods and Seal Beach, have comparatively low median household incomes.

Table 4-12
Regional Analysis of Fair Housing Impediments
Median Household Income in 1999 Dollars by Race/Ethnicity of Householder
Entitlement Cities – 2000

Entitlement City	BAA	AI/AN	Asian	NHOPI	SOR	TOMR	Hispanic	White	All HH
Anaheim	39,335	48,750	52,343	53,750	39,272	41,675	39,430	53,056	47,122
Buena Park	41,418	45,625	56,171	79,355	43,750	45,114	43,984	52,048	50,336
Fountain Valley	39,432	66,705	66,066	51,563	56,033	51,734	62,026	72,056	69,734
Fullerton	36,000	49,167	50,817	85,643	39,991	40,030	41,587	54,359	50,269
Garden Grove	45,966	38,819	44,111	41,111	44,169	45,338	44,080	52,260	47,754
Huntington Beach	57,656	65,852	66,077	43,594	50,979	53,113	53,111	66,377	64,824
Irvine	52,443	69,125	67,246	54,444	51,163	53,156	62,616	76,742	72,057
La Habra	40,595	45,750	67,171	30,833	42,120	49,236	44,157	49,293	47,652
Lake Forest	64,732	46,618	71,094	85,124	68,438	57,656	59,633	68,949	67,967
Newport Beach	55,729	60,469	72,578	61,518	72,159	65,500	61,766	85,549	83,455
Orange	61,875	46,563	65,678	58,036	43,321	56,068	43,486	63,927	58,994
Rancho Santa Margarita	80,776	100,470	85,935	32,083	52,917	64,286	65,431	80,716	78,475
Santa Ana	47,083	39,718	47,993	44,708	41,891	42,156	41,558	48,658	43,412
Westminster	37,750	56,875	44,395	47,750	45,849	52,000	45,933	53,614	49,450

Sources: Census 2000 Summary File 3, Median Household Income (by Race/Ethnicity), Tables P152 A, B, C, D, E, F, G, H and I.
Table P53 Median Household Income in 1999 (Dollars)

Table construction by Castañeda & Associates

Notes:

BAA	Black or African American Alone Householder
AI/AN	American Indian and Alaska Native Alone Householder
Asian	Asian Alone Householder
NHOPI	Native Hawaiian and Other Pacific Islander Alone Householder
SOR	Some Other Race Alone Householder
TOMR	Two or More Races Householder
Hispanic	Hispanic or Latino Householder
White	White Alone, Not Hispanic or Latino Householder
All HH	All Households

Table 4-13
Regional Analysis of Fair Housing Impediments
Median Household Income in 1999 Dollars by Race/Ethnicity of Householder
Urban County – 2000

Urban County City	BAA	AI/AN	Asian	NHOPI	SOR	TOMR	Hispanic	White	All HH
Aliso Viejo	53,125	71,983	76,610	72,250	61,250	61,447	72,170	78,915	76,409
Brea	54,375	30,682	62,760	66,250	49,653	50,391	52,118	61,453	59,759
Cypress	65,948	85,917	66,635	29,167	52,188	54,063	55,465	65,762	64,377
Dana Point	51,083	49,519	65,278	46,810	41,042	48,594	48,368	66,584	63,043
Laguna Beach	81,947	96,916	87,409	44,792	20,924	37,969	66,923	76,239	75,808
Laguna Hills	111,382	28,125	86,682	97,467	46,450	50,978	61,055	70,630	70,234
Laguna Woods	6,250	38,750	21,359	0	49,500	22,321	37,689	30,582	30,493
La Palma	71,250	42,000	68,750	57,969	63,884	70,446	64,183	71,172	68,438
Los Alamitos	65,500	63,205	47,440	0	49,135	55,903	60,966	54,344	55,286
Placentia	41,389	42,375	72,375	11,250	43,922	63,750	48,364	69,100	62,803
Seal Beach	50,781	51,528	95,556	36,250	51,538	46,964	44,219	40,676	42,079
Stanton	44,274	12,100	45,052	60,278	37,450	33,750	36,823	40,422	39,127
Villa Park	200,000+	0	114,850	200,000+	26,250	101,435	68,092	120,361	116,203
Yorba Linda	107,474	100,827	88,532	69,453	70,156	70,833	74,728	91,303	89,593

Sources: Census 2000 Summary File 3, Median Household Income (by Race/Ethnicity), Tables P152 A, B, C, D, E, F, G, H and I. Table P53 Median Household Income in 1999 (Dollars)

Table construction by Castañeda & Associates

Notes:

BAA	Black or African American Alone Householder
AI/AN	American Indian and Alaska Native Alone Householder
AA	Asian Alone Householder
NHOPI	Native Hawaiian and Other Pacific Islander Alone Householder
SORA	Some Other Race Alone Householder
TOMR	Two or More Races Householder
Hispanic	Hispanic or Latino Householder
White	White Alone, Not Hispanic or Latino Householder
All HH	All Households

Table 4-13 shows that the Laguna Woods' Black or African American householders had a median household income of \$6,250. Although this figure seems low, Census 2000 does report that median household income for Black or African American householders living in Laguna Woods.

The last column in Tables 4-12 and 4-13 shows the median household income for all householders. The median household incomes of each racial/ethnic group can be compared to that of all householders to determine a relative ranking of each group to all households in each jurisdiction.

2. Areas of Low/Moderate Income Concentration

Census 2010 and 2008 *American Community Survey* data are unavailable at the census tract level. Thus, Technical Appendix C presents the low- and moderate-income population residing in the Entitlement Cities and Urban County's census tracts and block groups based on Census 2000 data. The census tracts/block groups were grouped according to five intervals:

- 0%-25%
- 25.1% -50%
- 50.1%-65.0%
- 65.1%-80.0%
- 80.1%-100.0%

Table 4-14 shows that within the area included in the *Regional AI*, there are 112 block groups with more than 80% of the population in the low/mod income category. Sixty percent of these block groups are located in Santa Ana (41) and in Anaheim (26).

There are 227 block groups where 65.1% to 80% of the population has low/mod incomes. Six cities have 15 or more block groups where the percentage of the population having low/mod incomes is between 65.1% and 80.0%. Again, both Santa Ana and Anaheim have the highest numbers of block groups with 56 and 44 respectively.

Technical Appendix C contains the detailed low/mod income population by census tract and block group. The income data are presented in rank order from highest to lowest percentage of low/mod income population. For example, Block Group 2 of Census Tract 746.01 ranks as the 14th highest block group with 97.7% of the population having low/moderate incomes.

Table 4-14
Regional Analysis of Fair Housing Impediments
Number of Census Tract Block Groups by City/Location and Percent Low/Mod-2000

City/Area	# of Block Groups and Percent Low/Mod	
	80.1%-100.0%	65.1%-80.0%
Anaheim	26	44
Buena Park	3	7
Fullerton	10	17
Garden Grove	9	18
La Habra	1	15
Laguna Woods	2	9
Orange	3	8
Santa Ana	41	56
Stanton	3	7
Westminster	4	11
Other Cities/Areas	9	27
Unincorporated	1	8
Total	112	227

Source: Technical Appendix C
Table construction by Castañeda & Associates

Attachment A
Definitions of Housing and Population Characteristics
And Census Boundaries

Housing Characteristics

Housing Structure: A structure is a separate building that either has open spaces on all sides or is separated from other structures by dividing walls that extend from ground to roof. In determining the number of units in a structure, all housing units, both occupied and vacant, are counted. Stores and office space are excluded. The statistics are presented for the number of housing units in structures of specified type and size, not for the number of residential buildings.

1-unit, detached: This is a 1-unit structure detached from any other house; that is, with open space on all four sides. Such structures are considered detached even if they have an adjoining shed or garage. A 1-unit structure that contains a business is considered detached as long as the building has open space on all four sides. Mobile homes to which one or more permanent rooms have been added or built are also included.

1-unit, attached: This is a 1-unit structure that has one or more walls extending from ground to roof separating it from adjoining structures. In row houses (sometimes called townhouses), double houses, or houses attached to nonresidential structures, each house is a separate, attached structure if the dividing or common wall goes from ground to roof.

2 or more units: These are units in structures containing 2 or more housing units, further categorized as units in structures with 2, 3 or 4, 5 to 9, 10 to 19, 20 to 49, and 50 or more units.

Mobile Home: Both occupied and vacant mobile homes to which no permanent rooms have been added are counted in this category. Mobile homes used only for business purposes or for extra sleeping space and mobile homes for sale on a dealer's lot, at the factory, or in storage are not counted in the housing inventory.

Boat, RV, Van, etc.: This category is for any living quarters occupied as a housing unit that does not fit in the previous categories. Examples that fit in this category are houseboats, railroad cars, campers, and vans.

Population

Group Quarters: The group quarters population includes all people not living in households. Two general categories of people in group quarters are recognized: (1) the institutionalized population and (2) the noninstitutionalized population.

Institutionalized Population: The institutionalized population includes people under formally authorized, supervised care or custody in institutions at the time of enumeration, such as correctional institutions, nursing homes, and juvenile institutions.

Noninstitutionalized Population: The noninstitutionalized population includes all people who live in group quarters other than institutions, such as college dormitories, military quarters, and group homes. Also included is staff residing at institutional group quarters.

Household: A household includes all of the people who occupy a housing unit. (People not living in households are classified as living in group quarters.) A housing unit is a house, an apartment, a mobile home, a group of rooms, or a single room occupied (or if vacant, intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live separately from any other people in the building and that have direct access from the outside of the building or through a common hall. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated people who share living quarters.

In 100-percent tabulations, the count of households or householders always equals the count of occupied housing units. In sample tabulations, the numbers may differ as a result of the weighting process.

Census Boundaries

Census Tract: Designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions at the time of establishment, census tracts average about 4,000 inhabitants. Census tract boundaries follow visible features, but may follow governmental unit boundaries and other non-visible features in some instances; they always nest within counties.

For example, the area *generally* bounded by Pine Street, Main Street, Edinger Avenue, and Flower Street is census tract 746.01 in Santa Ana.

Block Group: A subdivision of a census tract, a block group is the smallest geographic unit for which the Census Bureau tabulates *sample* data. A block group consists of all the blocks within a census tract with the same beginning number. For example, in Census Tract 746.01, the area bounded by West Pine Street, South Cypress Avenue, West Bishop Street, and South Birch Street is Block Group 2. Block Group 2 is comprised of all the individual blocks with a beginning numbering in the 2000 range.

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Section 5

Regional Private Sector Fair Housing Analysis

SECTION 5

REGIONAL PRIVATE SECTOR FAIR HOUSING ANALYSIS

Pursuant to a Scope of Work approved by HUD-LA, the *Regional AI* examines the following private sector impediments:

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

A. HOUSING DISCRIMINATION

1. Prohibited Housing Discriminatory Practices

Sections 804 (a), (b) and (d) of the 1968 Fair Housing Act describe several prohibited housing discriminatory practices such as the following:

- (a) To refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin.
- (b) To discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, sex, familial status, or national origin.
- (d) To represent to any person because of race, color, religion, sex, handicap, familial status, or national origin that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.

Sections 804(f)(1), (2) and (3) prohibit the following practices because of a handicap:

- (1) To discriminate in the sale or rental, or to otherwise make unavailable or deny, a dwelling to any buyer or renter because of a handicap.
- (2) To discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection with such dwelling, because of a handicap.
- (3)(A) a refusal to permit, at the expense of the handicapped person, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises.
- (3)(B) a refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling.

(3)(C) failure to comply with accessible design and construction requirements

The California Fair Employment and Housing Act (FEHA) prohibits unlawful practices similar to those that are described in the Federal Fair Housing Act. For example, Article 2 – Housing Discrimination - Section 12955 of FEHA states the following are unlawful practices:

- (a) For the owner of any housing accommodation to discriminate against or harass any person because of the race, color, religion, sex, sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability of that person.
- (b) For the owner of any housing accommodation to make or to cause to be made any written or oral inquiry concerning the race, color, religion, sex, sexual orientation, marital status, national origin, ancestry, familial status, or disability of any person seeking to purchase, rent or lease any housing accommodation.
- (f) For any owner of housing accommodations to harass, evict, or otherwise discriminate against any person in the sale or rental of housing accommodations when the owner's dominant purpose is retaliation against a person who has opposed practices unlawful under this section, informed law enforcement agencies of practices believed unlawful under this section, has testified or assisted in any proceeding under this part, or has aided or encouraged a person to exercise or enjoy the rights secured by this part. Nothing herein is intended to cause or permit the delay of an unlawful detainer action.
- (k) To otherwise make unavailable or deny a dwelling based on discrimination because of race, color, religion, sex, sexual orientation, familial status, source of income, disability, or national origin.

HUD, the State Department of Fair Employment and Housing (DFEH) and FHCOC handle housing discrimination complaints. However, it is not known whether the number of complaints is a true measure of the incidents of housing discrimination. Housing discrimination may be underreported; therefore, the number of complaints may not accurately measure the extent of this private sector fair housing impediment.

Evidence on underreporting is supported by a HUD-sponsored study conducted by The Urban Institute. That research study concluded:

“Another finding with implications for fair housing programs involves the fact that so few people who believed they had been discriminated against took any action, with most seeing little point in doing so.”

The Urban Institute, How Much Do We Know: Public Awareness of the Nation's Fair Housing Laws, prepared for the U.S. Department of Housing and Urban Development, Office of Policy Development and Research, April 2002, pg. 7

A follow-up study finds that between 2001 and 2005 knowledge of fair housing laws has increased in two areas – discrimination against families with children and steering of prospective homebuyers by race – but declined in one area – discrimination based on religion. On a composite index of overall knowledge, there was no change between 2001 and 2005. There was, however, a significant increase in overall support for fair housing laws.

The study also explores whether people know what to do to address perceived discrimination and why so few people who perceive they have been discriminated against do anything about it.

“Four of every five persons who believed they had experienced housing discrimination plausibly covered by the federal Act profess not ... to have done anything at all in response. Many alleged victims maintain they did not take action because they presumed doing so would not have been worth it or would not have helped. Some, however, did not know where or how to complain, supposed it would cost too much money or take too much time, were too busy, or feared retaliation. The minority who did respond mainly complained to the person thought to be discriminating or to someone else, but a small proportion also talked to or hired a lawyer or sought help from or filed a complaint with a fair housing or other group or government agency.”

The Urban Institute, Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law, prepared for the U.S. Department of Housing and Urban Development, Office of Policy Development and Research, February 2006, pg. iii

2. Discrimination Complaints

a. Background

With respect to housing discrimination complaints, the 2006 HUD study found:

“About 17 percent of the adult public claims to have suffered discrimination at some point when trying to buy or rent a house or apartment. If, however, the explanations given about the nature of the perceived discrimination are taken into account, about eight percent of the public had experiences that might plausibly have been protected by the Act. While the frequency, actions, and bases for the alleged discrimination are diverse, majorities of this group believe they were discriminated against more than one time, were looking to rent more frequently than to buy, and identified race more so than any other attribute or characteristic as the basis of the discrimination.”

b. Number of Housing Discrimination Complaints

The California Department of Fair Employment and Housing (DFEH) provided data to the FHCOC on housing discrimination complaints. The FHCOC compiled the statistics for this *Regional AI*. In the five-year period since the prior AI, about 300 housing discrimination complaints have been filed with DFEH. Table 5-1 shows the number of housing discrimination cases by Entitlement Cities and Urban County Cities. The number of housing discrimination complaints averaged 60 per year. The number of cases ranged from a low of 46 in 2005 to a high of 78 in 2006.

The vast majority – 244 of 302 housing discrimination complaints – have been filed in the Entitlement Cities. Irvine (58) and Anaheim (40) accounted for the highest number of complaints. Table 5-2 shows the number of closed housing discrimination cases by entitlement and urban county cities. Once again, the Irvine (61) and Anaheim accounted for the highest number of closed cases (37). Closed cases refer to cases that have been completely investigated and resolved.

Table 5-1
Regional Analysis of Fair Housing Impediments
Housing Discrimination Cases Filed by Year

Jurisdiction	2005	2006	2007	2008	2009	Total
Entitlement Cities						
Anaheim	3	8	8	14	7	40
Buena Park	2	1	5	4	2	14
Fountain Valley	1	1	3	1	2	8
Fullerton	0	5	3	2	0	10
Garden Grove	5	2	0	0	6	13
Huntington Beach	2	8	5	2	1	18
Irvine	9	14	12	10	13	58
La Habra	0	2	0	0	1	3
Lake Forest	0	3	1	1	2	7
Newport Beach	4	8	3	5	3	23
Orange	2	3	3	3	4	15
Rancho Santa Margarita	0	1	0	1	0	2
Santa Ana	3	5	5	8	1	22
Westminster	0	2	4	1	4	11
Subtotal	31	63	52	52	46	244
Urban County Cities and Unincorporated Areas						
Aliso Viejo	1	1	2	0	1	5
Brea	0	0	0	3	0	3
Cypress	2	0	1	0	2	5
Dana Point	0	2	1	0	0	2
Foothill Ranch ¹	1	0	0	0	0	1
La Palma	0	0	1	0	0	1
Ladera Ranch ¹	1	2	0	0	0	3
Laguna Beach	1	1	2	1	0	5
Laguna Hills	2	3	1	1	0	7
Laguna Woods	1	0	1	0	0	2
Los Alamitos	0	0	1	0	0	1
Placentia	0	4	2	0	0	6
Seal Beach	0	1	3	0	0	4
Stanton	4	0	0	0	0	4
Villa Park	0	0	0	0	0	0
Yorba Linda	2	1	2	3	0	8
Subtotal	15	15	17	8	3	58
TOTAL	46	78	69	60	49	302

¹Unincorporated area

Source: California Department of Fair Employment and Housing

Table construction by Castañeda & Associates

Table 5-2
Regional Analysis of Fair Housing Impediments
Housing Discrimination Cases Closed by Year

Jurisdiction	2005	2006	2007	2008	2009	Total
Entitlement Cities						
Anaheim	4	2	7	13	11	37
Buena Park	3	0	4	2	5	14
Fountain Valley	0	1	2	3	2	8
Fullerton	1	3	2	5	0	11
Garden Grove	3	2	2	0	5	12
Huntington Beach	2	5	4	4	3	18
Irvine	9	14	7	13	18	61
La Habra	0	1	1	0	1	3
Lake Forest	2	2	1	1	1	7
Newport Beach	7	6	1	5	6	25
Orange	3	2	3	4	5	17
Rancho Santa Margarita	0	0	1	0	1	2
Santa Ana	1	6	7	7	3	24
Westminster	1	1	2	3	2	9
Subtotal	36	45	44	60	63	248
Urban County Cities and Unincorporated Areas						
Aliso Viejo	1	1	1	1	1	5
Brea	0	0	0	0	3	3
Cypress	2	1	0	1	0	4
Dana Point	0	0	2	1	0	3
Foothill Ranch ¹	1	0	0	0	0	1
La Palma	0	0	0	1	0	1
Ladera Ranch ¹	0	1	2	0	0	3
Laguna Beach	1	0	1	0	3	5
Laguna Hills	2	1	3	0	1	7
Laguna Woods	1	0	0	1	0	2
Los Alamitos	0	0	0	1	0	1
Placentia	0	0	3	2	1	6
Seal Beach	0	1	3	0	0	4
Stanton	0	2	0	9	0	11
Villa Park	0	0	0	0	0	0
Yorba Linda	1	1	1	2	3	8
Subtotal	9	8	16	19	12	64
TOTAL	45	53	60	79	75	312

¹Unincorporated area

Source: California Department of Fair Employment and Housing

Table construction by Castañeda & Associates

c. Bases for Housing Discrimination Complaints

Tables 5-3 and 5-4 show the bases for the housing discrimination complaints for the Entitlement Cities and Urban County Cities. A housing discrimination complaint can have more than one basis. The bases include:

- Physical Disability
- Mental Disability
- Race/Color
- National Origin
- Familial Status
- Sex
- Marital Status
- Other - Retaliation; Religion; Source of Income; Association and Age

About 35% of the housing discrimination complaints were based on a physical or mental disability. Since the prior *Regional AI* was completed, disability has been increasing as a basis for a housing discrimination complaint. Race and color (20%) and national origin (14%) rank second and third as a basis for making a housing discrimination complaint. Although Individual cities vary in terms of the basis for a housing discrimination complaint, disability, race/color and national origin also comprise the basis for the highest number of complaints.

The bases for housing discrimination complaints in Orange County vary considerably from those found in the HUD studies. HUD's 2006 study found that 58% of those who believe they experienced discrimination think it was due to their race, followed by familial status (27%) and ethnicity (17%). According to the HUD study:

"Surprisingly, less than one percent of the HUD survey respondents indicated disability as a reason for the perceived discrimination, whereas discrimination based on disability is among the most common complaints received by HUD."

However, it should be noted that the Orange County findings are based on actual complaints filed, whereas the HUD study refers to persons who perceived housing discrimination but may not have filed a complaint.

Table 5-3
Regional Analysis of Fair Housing Impediments
Housing Discrimination Cases Filed by Bases 2005-2009
For Entitlement Cities

Jurisdiction	Physical Disability	Mental Disability	Race/ Color	Nat. Origin	Familial Status	Sex	Marital Status	Other¹	Total
Anaheim	14	3	5	5	7	3	5	4	46
Buena Park	4	0	7	1	3	0	0	2	17
Fountain Valley	1	2	3	1	3	0	0	0	10
Fullerton	8	0	1	1	1	0	0	1	12
Garden Grove	1	2	1	5	5	2	0	0	16
Huntington Beach	9	0	1	5	6	1	1	3	26
Irvine	18	5	18	16	1	2	4	8	72
La Habra	0	1	1	1	0	0	0	0	3
Lake Forest	3	1	1	2	0	0	0	0	7
Newport Beach	9	3	7	2	4	0	1	3	29
Orange	3	0	5	2	5	0	1	0	16
Rancho Santa Marg.	2	0	0	0	0	0	0	0	2
Santa Ana	9	1	9	2	1	3	0	0	25
Westminster	1	2	1	4	1	3	0	3	15
Subtotal	82	20	60	47	37	14	12	24	296

Note: The number of bases exceeds the number of cases because a housing discrimination complaint can have more than one basis.

Source: California Department of Fair Employment and Housing

¹Other included Retaliation (9); Religion (8); Source of Income (3); Association (3) and Age (1)

Table construction by Castañeda & Associates

Table 5-4
Regional Analysis of Fair Housing Impediments
Housing Discrimination Cases Filed by Bases 2005-2009
For Urban County Cities

Jurisdiction	Physical Disability	Mental Disability	Race/ Color	Nat. Origin	Familial Status	Sex	Marital Status	Other¹	Total
Aliso Viejo	4	0	0	1	0	0	0	1	6
Brea	0	0	3	0	0	0	0	0	3
Cypress	3	1	2	0	0	2	0	2	10
Dana Point	1	0	0	0	1	2	1	0	5
Foothill Ranch	0	0	1	0	0	0	0	0	1
La Palma	0	0	0	0	0	1	1	1	3
Ladera Ranch	2	0	1	0	0	0	0	0	3
Laguna Beach	1	0	2	1	0	0	1	2	7
Laguna Hills	3	0	3	2	3	0	0	1	12
Laguna Woods	2	0	0	0	0	0	0	0	2
Los Alamitos	0	0	0	0	0	1	0	0	1
Placentia	1	3	0	2	0	0	0	0	6
Seal Beach	1	0	3	0	0	0	0	0	4
Stanton	2	0	1	0	2	0	0	0	5
Villa Park	0	0	0	0	0	0	0	0	0
Yorba Linda	3	0	0	0	2	0	0	3	8
Subtotal	23	4	16	6	8	6	3	10	76
TOTAL	105	24	76	53	45	20	15	34	372

Note: The number of bases exceeds the number of cases because a housing discrimination complaint can have more than one basis.

Source: California Department of Fair Employment and Housing

¹Other includes Retaliation (3); Religion (2); Source of Income (3); Association (2)

Table construction by Castañeda & Associates

d. Alleged Acts

The DFEH compiles data on number of housing discrimination cases according to nine types of alleged acts:

- Refusal to Rent
- Eviction
- Refusal to Show
- Refusal to Sell
- Loan Withheld
- Unequal Terms
- Harassment
- Unequal Access to Facilities
- Denied Reasonable Modification/Accommodation

Table 5-5 shows the number of housing cases filed by alleged acts between 2005 and 2009. A summary of the highest number and percentage of alleged acts is presented below:

- About 22% (101) of the housing discrimination complaints occurred during the eviction process.
- About 19% each of the alleged acts pertained to unequal terms (88) and to denial of a reasonable modification and/or accommodation (87).
- About 15% each of the housing cases were filed because of harassment (72) and the refusal to rent (68).

It appears that most of the alleged acts affect renters or persons seeking rental housing. This mirrors HUD's national study which found that about 70% of persons who thought they were victims of discrimination were looking to rent at the time.

In summary, progress on reducing housing discrimination probably cannot be measured by a reduction in the number of complaints because so few people who believe they have been victims of discrimination actually file a complaint. Therefore, progress – at least in the short run – could be measured by an increase in complaints as more people:

- Become aware that they can file a complaint
- Know where to file a complaint
- Believe that their complaint will produce tangible results

Table 5-5
Regional Analysis of Fair Housing Impediments
Housing Cases Filed By Alleged Act – 2005-2009

Alleged Act	2005	2006	2007	2008	2009	Total	Percent
Refusal to Rent	8	16	20	15	9	68	14.7%
Eviction	20	28	19	19	15	101	21.9%
Refusal to Show	1	2	0	0	0	3	0.7%
Refusal to Sell	5	4	1	0	1	11	2.4%
Loan Withheld	0	3	1	1	1	6	1.3%
Unequal Terms	13	27	23	12	13	88	19.1%
Harassment	13	23	18	8	10	72	15.6%
Unequal Access to Facilities	3	4	8	4	6	25	5.4%
Denied Reasonable Modification/Accommodations	10	14	25	18	20	87	18.9%
Total	73	121	115	77	75	461	100.0%

Source: California Department of Fair Employment and Housing

Note: includes alleged acts occurring in the cities participating in the *Regional AI*

Total acts reported exceed the total number of cases filed because some cases are filed under more than one act

Table construction by Castañeda & Associates

3. Housing Discrimination Complaint Services

The Fair Housing Council of Orange County is a private non-profit organization formed in 1965 in the wake of the civil rights movement that resulted in the Civil Rights Act of 1964. The Council incorporated in 1968, the same year that Congress extended civil rights protections to cover housing with the adoption of the Fair Housing Act. Under the direction of a volunteer board of directors and with a paid staff of 14, the agency works to fulfill a *mission of protecting the quality of life in Orange County by ensuring equal access to housing opportunities, fostering diversity and preserving dignity and human rights.*

Contracting to serve 15 Entitlement Cities and the Urban County Program for the provision of fair housing services for their residents, the Fair Housing Council handles more than 100 cases of alleged housing discrimination in the county each year.

4. Actions to be Taken

During the five-year period of the Fair Housing Action Plan, the FHCOC will take the following actions:

- Continue to process housing discrimination complaints filed by city and county residents.
- Conduct testing of housing provider practices to determine whether there are differences in treatment based on a protected class. The 2005-2009 housing discrimination complaint data and the fair housing community profile can be used to identify the protected classes and locations of housing providers that should be tested.

- Revise its website to provide direct access to a housing discrimination complaint form and provide a diagram or brief explanation of the process for investigating and resolving a complaint.
- Revise its website to add more information on how residents can detect whether they have been victims of unlawful housing discrimination.
- Publish a quarterly report on the FHCOC website summarizing the remedies pertaining to filed housing discrimination complaints.
- Ensure that all jurisdictions provide a link to the FHCOC website.
- Compile an Annual Report on housing discrimination complaints filed with the FHCOC, the State Department of Fair Employment and Housing (DFEH) and HUD. The report will include housing discrimination complaints unique to each participating jurisdiction as well as those of the entire County. The Annual Report will describe emerging trends within the City and County.
- Transmit the Annual Report to the participating jurisdictions by August of each calendar year. This schedule allows the jurisdictions to include a summary of the report findings in the Consolidated Plan Annual Performance and Evaluation Report. That Report is published in September of each year.

B. DISCRIMINATORY ADVERTISING

1. Background

Section 804 (c) of the 1968 Fair Housing Act prohibits discriminatory advertising; it is unlawful:

To make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, handicap, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.

The California Fair Employment and Housing Act contains similar language prohibiting discriminatory advertising.

To demonstrate whether discriminatory advertising meets the threshold for being considered a regional impediment to fair housing choice, print and online advertising was reviewed during the month of January 2010. Classified ads printed in the Los Angeles Times and Orange County Register were reviewed for words and phrases that might be viewed as discriminatory. During this period, however, few for-rent ads were published in either newspaper. Because of limited newspaper print advertising, an online search of apartment ads was conducted via Apartments.com, which is provided by the Los Angeles Times.

Each ad was reviewed to determine if it might indicate a “preference, limitation or discrimination.” Advertisements which describe the property being advertised or the services available at the property are generally considered acceptable. The review, then, focused on

words and phrases that deviated from physical descriptions of the property and available services.

Guidance on specific words and phrases that are or could be interpreted as discriminatory was obtained from the following:

- Roberta Achtenberg, Assistant Secretary for Fair Housing and Equal Opportunity, HUD, "Guidance Regarding Advertisements under Section 804 (c) of the Fair Housing Act," January 9, 1995
- Bryan Green, Deputy Assistant Secretary for Enforcement, *Fair Housing Act Application to Internet Advertising*, September 20, 2006 [memorandum to FHEO Regional Directors]
- California Newspaper Publishers Association, *Fair Housing Advertising Manual*, Fourth Edition, Copyright, 2001
- 24 CFR 109.30 Appendix I to Part 109 – Fair Housing Advertising. Part 109 is no longer officially part of the Code of Regulations having been withdrawn effective May 1, 1996. However, it is still published on HUD's website
- State Department of Fair Employment and Housing, Guidance Memorandum

These sources provide guidance on the specific words and phrases that are or could be considered discriminatory with respect the following:

- Race/Color/National Origin/Ancestry
- Sex
- Disability
- Familial/Marital Status
- Religion
- Source of Income
- Sexual Orientation
- Senior Housing

Attachment A is a summary of the California Newspaper Publishers Association guidance on advertising words and phrases.

2. Review of Print Ads and Online Advertising

The newspaper print and online ads were reviewed and organized by Entitlement City and Urban County jurisdiction and a data base was developed – by city – of the number of ads, the number that contained "questionable language" and the frequency of the ads. Questionable language refers to words and phrases that deviated from the physical description of the for-rent unit and services available.

Table 5-6 shows the number of ads placed by apartment complexes located in each city. A total of 177 apartment complexes were advertised online at Apartments.com for Entitlement Cities. There were 44 online ads for complexes in Urban County Cities.

Table 5-6
Regional Analysis of Fair Housing Impediments
Number of Apartment Complexes
Publishing For Rent Ads by Jurisdiction and Unincorporated Area
(Apartment.com) – January 2010

Entitlement Cities	Number of Complexes
Anaheim	43
Buena Park	8
Fountain Valley	6
Fullerton	13
Garden Grove	9
Huntington Beach	14
Irvine	10
Lake Forest	8
La Habra	10
Newport Beach	6
Orange	9
Rancho Santa Margarita	8
Santa Ana	14
Tustin	13
Westminster	6
Urban County Cities/Area	
Aliso Viejo	11
Brea	6
Cypress	4
Dana Point/Capistrano Beach	2
Foothill Ranch ¹	2
Laguna Beach	1
Laguna Hills	4
Los Alamitos	N/A
La Palma	2
Ladera Ranch ¹	3
Laguna Woods	N/A
Midway City ¹	0
Placentia	4
Seal Beach	1
Stanton	1
Trabuco Canyon ¹	N/A
Villa Park	N/A
Yorba Linda	3

¹Unincorporated area

Source: Apartment.com website search conducted on January 4, 2010

Note: 0 denotes no listings available from Apartments.com.
 N/A denotes no information available from Apartments.com
 Table construction by Castañeda & Associates

The overwhelming number of ads in the Entitlement Cities conveyed information that was limited to the location of the apartment, number of bedrooms and bathrooms, and monthly rent. Very few ads – about 8% - contained language that did not pertain to the physical description of the property. The most frequent words or phrases included:

- “Section 8 Vouchers Accepted”
- “No pets allowed”

In the Urban County Cities, only three ads had questionable language. Two ads stated income restrictions and one noted its proximity to “places of worship”.

Table 5-7 provides an analysis of the print ads with respect to the city in which the apartment complex is located; number of ads placed; ads with non-property related words and phrases; and the number of ads published with those words and phrases. There was a total of 427 unique print ads published in The Orange County Register in the four January Sunday editions for apartments (223) and homes for rent (204) in Entitlement Cities. (January 3, January 10, January 17 and January 24, 2010)

The number of unique print ads corresponds to the number of apartment complexes or homes publishing an ad. Forty seven of the 223 apartment ads contained non-property related words or phrases. The overwhelming majority of the non-property related words or phrases was “No Pets” which occurred in 38 (17%) of the 223 apartment ads. There were also references to rental assistance such as “Section 8 ok” and “HUD ok”. Some ads were published multiple times during the four week period.

Twenty-eight of the 204 homes for rent ads contained non-property related words or phrases. Once again, the “no pets” was the most frequent non-property related word or phrase, having occurred in 26 (12.7%) of the 204 ads.

Table 5-8 shows the same analysis for the Urban County Cities. There were 62 unique ads for apartments and homes for rent. Ten ads had words and phrases that did not pertain to the physical description of the property: seven stated “no pets” two were “Section 8” related and one ad stated “Senior Citizen”.

3. Examples of Possible Advertising Impediments

a. Source of Income

Source of income is a protected class under California’s fair housing law, effective January 1, 2000. Thus, it is unlawful to print or publish an advertisement that prefers, limits or discriminates on the basis of the source of the tenant’s income. However, according to the California Newspaper Publishers Association, an ad referring to a government program in which an agency makes payments directly to landlords, e.g. the federal government’s Section 8 housing program, would probably not be unlawful so long as the tenant’s benefit or “income” is not paid directly to the “tenant or the tenant’s representative”. Thus, unless an ad taker knows the term is being used as a code word for unlawful discrimination, an ad that says “Section 8 ok”, or “No Section 8” would probably not expose the newspaper to liability under the law’s definition.

Table 5-7
Analysis of Rental Ads in Entitlement Cities
Orange County Register January 2010

City	Apartment Ads			Homes/Condos/Town Home Ads				
	Total # of Ads	Ads With Non-Property Related Words/Phrases	# of Ads	Total # of Ads	Ads With Non-Property Related Words/Phrases	# of Ads		
Anaheim	38	No Pets/Sect. 8 ok	1	25	No Pets	3		
		No Pets	4		HUD OK	1		
		Section 8 Housing Accepted	1					
		Section 8 welcome	1					
		HUD ok	1					
Total Ads			8			4		
Buena Park	10	Sec. 8 welcome/Income Qualification Apply		1	3	Section 8 ok		1
		No Pets		1				
Total Ads			2					1
Fountain Valley	2	No Pets	2	8	No Pets	1		
Total Ads			2			1		
Fullerton	23	Section 8 Housing ok/No Pets		1	11	None		N/A
		No Dogs		1				
		No Pets		2				
Total Ads			4					0
Garden Grove	24	No Pets		1	8	No Pet		3
		Section 8 welcome		1				
Total Ads			2					3
Huntington Beach	64	No Dog		3	60	No Pets		10
		No Pets		13				
Total Ads			16					10
Irvine	2	None		N/A	24	No Pets		4
Total Ads			0					4
La Habra	3	No Pets		1	3	None		N/A
		Sect. 8 ok		1				
Total Ads			2					0
Lake Forest	0	N/A		N/A	4	No Pets		1
Total Ads			0					1
Newport Beach	12	HUD OK		1	17	No Pets		1
		No Pets		1				
Total Ads			2					1
Orange	27	No Pets		3	23	No Pets		2
		Good Residents Wanted/No Pets		1				
Total Ads			4					2
Rancho St. Margarita	2	None		N/A	0	N/A		N/A
Total Ads			0					0
Santa Ana	8	Near Church/School		1	7	None		N/A
		No Pets		1				
Total Ads			2					0
Westminster	8	No Pets		2	11	No Pets		1
		HUD OK		1				
Total Ads			3					1
ALL ADS	223			47	204			28

Table construction by Castañeda & Associates

Table 5-8
Analysis of Rental Ads in Urban County Cities
Orange County Register January 2010

City	Apartment Ads			Homes/Condos/Town Home Ads		
	Total # of Ads	Ads With Non Property Related Language	# of Ads	Total # of Ads	Ads With Non Property Related Language	# of Ads
Aliso Viejo	0	N/A	N/A	4	None	N/A
Total Ads			0			0
Brea	3	No Pet	1	7	No Pets	2
Total Ads			1			2
Cypress	1	None	N/A	3	None	N/A
Total Ads			0			0
Dana Point	1	Section 8 welcome	1	4	None	N/A
Total Ads			1			0
Foothill Ranch	0	N/A	N/A	1	None	N/A
Total Ads			0			0
Laguna Beach	0	N/A	N/A	1	None	N/A
Total Ads			0			0
Laguna Hills	0	N/A	N/A	4	No Pets	1
Total Ads			0			1
Laguna Woods	0	N/A	N/A	4	No Pets	1
Total Ads			0			1
La Palma	0	N/A	N/A	2	None	N/A
Total Ads			0			0
Los Alamitos	0	N/A	N/A	0	N/A	N/A
Total Ads			0			0
Midway City	1	None	N/A	2	None	N/A
Total Ads			0			0
Placentia	6	Section 8 ok	1	4	No Dogs ²	1
Total Ads			1			1
Seal Beach	0	N/A	N/A	0	N/A	N/A
Total Ads			0			0
Stanton	1	None	N/A	2	None	N/A
Total Ads			0			0
Villa Park	0	N/A	N/A	1	None	N/A
Total Ads			0			0
Yorba Linda	6	SR. CITIZEN	1	4	None	N/A
		No Pets ¹	1			
Total Ads			2			0
ALL ADS	19		5	43		5

Source: Print ads in the four Sunday editions of the Orange County Register on January 3, January 10, January 17 and January 24, 2010

Table construction by Castañeda & Associates

¹The ad appeared twice, once without the No Pets comment

²The ad appears four times, once with the No Dogs comment

The rental housing market is accepting tenants that receive Section 8 rental assistance. Most of the ads contained phrases such as "Section 8 OK"; "HUD OK"; "Section 8 Welcome"; and "Section 8 Accepted". When the rental housing market vacancy rates become significantly lower, landlords may not have an incentive to attract tenants receiving Section 8 assistance. Under these conditions, "No Section 8" ads may become an impediment to fair housing choice because, in part, it could make such housing unavailable disproportionately to a protected class such as persons with disabilities. However, an ad stating "No Section 8" would not be illegal because under the California Fair Employment and Housing Act, "source of income" refers to income paid directly to a tenant or tenant's representative. A landlord that receives a Section 8 rental payment on behalf of a tenant from a housing authority is not considered a representative of the tenant.

b. No Pets

Persons with a disability are one of the classes protected from discrimination in housing. Apartments must allow, under certain conditions, "service animals" and "companion animals". A service animal is one trained to do work or perform tasks for the benefit of a person with a disability. A service animal can be of varying species, breed or size. It might wear specialized equipment such as a backpack, harness, special collar or leash, but this is not a legal requirement. Companion animals, also referred to as assistive or therapeutic animals, can assist individuals with disabilities in their daily living and as with service animals, help disabled persons overcome the limitations of their disabilities and the barriers in their environment. They are typically for individuals with mental disabilities and can assist the person with depression, anxiety or provide emotional support.

Under Federal and State fair housing laws, individuals with disabilities may ask their housing provider to make reasonable accommodations in the "no pets" policy to allow for their use of a companion/service animal. The housing provider may ask the disabled applicant/tenant to provide verification of the need for the animal from a qualified professional. Once that need is verified, the housing provider must generally allow the accommodation.

Some disabled persons are unaware of their fair housing rights and, as a consequence, may not consider as available to them apartments with ads that state "no pets." Therefore, an action to affirmatively further fair housing is to persuade the Los Angeles Times, Orange County Register and Apartments.com to publish a concise "no pets" notice that indicates rental housing owners must provide reasonable accommodations, including "service animals" and "companion animals" for disabled persons.

c. Age

Federal regulations specify that unless the housing being offered meets government requirements for "senior" or "senior only" housing, advertisers may not express a preference or limitation on the basis of age. A few ads contained phrases indicating a preference for seniors. One ad stated "senior citizen". It appears that this ad was placed by an individual owner of a condominium. However, it is not known if the condominium complex met the requirements of a senior only complex. Two apartment complexes placed ads stating that a 5% discount was given to seniors. The complexes are located in Orange and Westminster and are managed by the same company.

4. Fair Housing Notices

The Los Angeles Times and Apartments.com publish fair housing notices. The Los Angeles Times notice is published on the same page as the rental ads and states that it is illegal to indicate any preference, limitation or discrimination because a person belongs to one of the protected classes. It also refers readers to the Housing Rights Center and the Fair Housing Council of Orange County.

Apartments.com states in its disclaimer that it and all home sellers and landlords must adhere to fair housing laws such as the Civil Rights Act of 1964, the American with Disabilities Act, and the Equal Credit Opportunity Act. It also states that those seeking to rent an apartment "have the right to expect...reasonable accommodation in rules, policies and procedures for persons with disabilities." However, the fair housing notice is difficult to find on the website and persons placing an ad are not required to read the notice before an ad is placed.

In a review of the rental ads in both print and online editions of The Orange County Register, a fair housing disclaimer was not located. Typically, such a disclaimer is located at the beginning of the real estate classified ads section.

5. Internet Advertising

The National Fair Housing Alliance (NFHA) completed a study in 2009 of discriminatory ads placed by housing providers on various websites. The most common Fair Housing Act violation that NFHA and its members found on the Internet was advertising discriminating against families with children. NFHA found ads stating preferences for tenants who were "single" or "a couple of individuals." Phrases such as "perfect for young couple" or "three adults" were found in ads for houses or apartments with multiple bedrooms. These ads indicate an illegal preference or limitation and discourage families with children from even considering contacting a landlord. The investigation also found discriminatory ads stating preferences based on national origin, religion and sex.

In California, the following are examples of ads that were placed on websites:

- "quiet complex of responsibles without kids"
- "no kids"
- "no pets, no children"

According to the NFHA study, Craigslist, the source of the overwhelming majority of housing advertising in today's market, and other Internet sites provide a convenient forum for illegal housing discrimination. Under current court decisions, these websites are not considered to be publishers and thus can neither be held liable under the Fair Housing Act nor be required to screen out illegal housing advertisements. Only the individual landlords who create and post discriminatory ads online can be held responsible.

The Communications Decency Act (CDA) is Title V of the Telecommunications Act of 1996 and was intended to protect families from online pornography and other forms of indecency. It states that operators of Internet services are not to be construed as publishers, and thus are not legally liable for the words of third parties who use their services. The CDA makes exceptions to

this rule as it relates to federal criminal statutes and intellectual property law, but does not make explicit exceptions for civil rights laws like the Fair Housing Act.

Private fair housing organizations, according to the NFHA study, have brought two lawsuits against online housing advertisers for publishing discriminatory housing advertisements. In each instance, the Court accepted the website's argument that the CDA protected it from liability under the Fair Housing Act to the extent that users provided content.

In reaching these decisions, the Courts relied upon Section 230(c) of the CDA to find that operators of interactive websites are not to be construed as "publishers" of the words posted by users of their websites. This section, entitled Protection for 'Good Samaritan' Blocking and Screening of Offensive Material, "aim[s] to protect interactive computer service providers 'who take (steps to screen indecent) and offensive material for their customers.'" Ironically, in refusing to take responsibility for discriminatory advertisements, these websites have screened nothing, opting instead to facilitate widespread distribution of discriminatory ads.

The NFHA states that the most effective way to stop discrimination in online housing ads is to hold all housing advertisers and publishers to the same standard. In order to hold accountable websites advertising housing, just as newspapers are currently held accountable, the Communications Decency Act of 1996 must be amended. Specifically, Section 230(c)(1) is the section of the CDA that provides immunity to websites for third party content. 47 U.S.C. § 230(c)(1) currently reads:

"TREATMENT OF PUBLISHER OR SPEAKER- 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."

The NFHA recommends that this section of the CDA should be amended to accommodate the requirements of the Fair Housing Act. An exemption could be made specifically for Fair Housing Act claims and amend 47 U.S.C. § 230(c)(1) as follows:

"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, 42 U.S.C. § 3601 et seq."

If the CDA is amended, websites will be responsible for the discriminatory advertisements they publish on the Internet and, therefore, will have an incentive to implement filtering systems to prevent discriminatory advertisements from ever reaching the public.

6. Actions to be Taken

During the five-year period of the Fair Housing Action Plan, the FHCOC will take the following actions:

- 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.
- 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.
- 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, 42 U.S.C. § 3601 et seq.
- Periodically review for rent and for sale ads published in the print media.
- Prepare a summary of the accomplishments each year and transmit to the Entitlement Cities and Urban County in August of each year. This schedule allows the Entitlement Cities and Urban County to include a summary of the accomplishments in the Consolidated Plan Annual Performance and Evaluation Report. That Report is published in September of each year.

C. BLOCKBUSTING

1. Background

Section 804(e) of the 1968 Fair Housing Act makes the following act, commonly referred to as blockbusting, unlawful:

For profit, to induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, handicap, familial status, or national origin.

Blockbusting and panic selling can occur when an individual, possibly a real estate licensee, claims that an impending change in the demographic composition of a neighborhood will cause property values to fall, crime to increase or schools to decline in quality. Section 10177(l)(1) of the Business and Professions Code states that the Real Estate Commissioner may revoke or suspend the license of a real estate licensee if he/she has done the following:

Solicited or induced the sale, lease, or listing for sale or lease of residential property on the ground, wholly or in part, of loss of value, increase in crime, or decline of the quality of the schools due to the present or prospective entry into the neighborhood of a person or persons having a characteristic listed in subdivision (a) or (d) of Section 12955 of the Government Code, as those characteristics are defined in Sections 12926 and 12926.1, subdivision (m) and paragraph (1) of subdivision (p) of Section 12955, and Section 12955.2 of the Government Code.

Government Code Section 12955 states it shall be unlawful:

- (a) For the owner of any housing accommodation to discriminate against or harass any person because of the race, color, religion, sex, sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability of that person.
- (d) For any person subject to the provisions of Section 51 of the Civil Code, as that Section applies to housing accommodations, to discriminate against any person on the basis of sex, sexual orientation, color, race, religion, ancestry, national origin, familial status, marital status, disability, source of income, or on any other basis prohibited by that section.

With respect to blockbusting, the California law has more protected classes than the Federal Fair Housing Act.

There is no local or county agency that maintains records on actual or potential blockbusting incidents. Such incidents would take place primarily as real estate agents attempt to solicit or induce homeowners to sell their homes. As previously noted, the California Real Estate Commissioner is authorized to take disciplinary action against licensees who have committed the prohibited discriminatory practice of blockbusting and panic selling. The Department of Real Estate stated in June 2010 that no Orange County licensee has had their license suspended or revoked because of the illegal practice of blockbusting.

2. Actions to be Taken

During the five-year period of the Fair Housing Action Plan, the FHCOC will take the following actions:

- Provide information on the FHCOC website on the unlawful practice of blockbusting including examples of this illegal practice.
- Work with the California Department of Real Estate to determine if any Orange County licensees have had their licenses suspended or revoked because of the illegal practice of blockbusting.
- In the event, a licensee has been found to have committed blockbusting, provide education and information on this practice to the responsible broker and all related salespersons.

D. DENIAL OF REASONABLE MODIFICATION/ACCOMMODATION

1. Background

It is unlawful to refuse to make reasonable accommodations for disabled persons. Section 804 (3) of the 1968 Fair Housing Act states that discrimination includes--

(A) a refusal to permit, at the expense of the handicapped person, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises, except that, in the case of a rental, the landlord may where it is reasonable to do so condition permission for a modification on the renter agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted.

(B) a refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling.

The DFEH compiles data on the number of housing discrimination cases according to nine types of alleged acts. During the 2005-2009 period, 461 alleged discriminatory acts were committed in the cases processed by the DFEH. Of this total, 87 or 18.9% involved denial of a reasonable modification/reasonable accommodation. About 17-18 denials of reasonable modification/reasonable accommodation occurred per year during the five-year period.

2. Actions to be Taken

During the five-year period of the Fair Housing Action Plan, the FHCOC will take the following actions:

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

E. HATE CRIMES

1. Background

Hate crime means –

“a criminal act committed, in whole or in part, because of one or more of the following actual or perceived characteristics of the victim: (1) disability, (2) gender, (3) nationality, (4) race or ethnicity, (5) religion, (6) sexual orientation, (7) association with a person or group with one or more of these actual or perceived characteristics.” [Source: California Penal Code section 422.55]

According to the California Department of Justice (DOJ), *hate crimes are not separate distinct crimes but rather traditional offenses motivated by the offender's bias*. A bias is –

A preformed negative opinion or attitude toward a group of persons based on their race, ethnicity, national origin, religion, gender, sexual orientation and/or physical/mental disability.

Police and Sheriff Department's report to the DOJ hate crime events which are -

An occurrence where a hate crime is involved.

In the DOJ report, the information about the event is a crime report or source document that meets the criteria for a hate crime. There may be one or more suspects involved, one or more victims targeted, and one or more offenses involved for each event.

A hate crime victim –

May be an individual, a business or financial institution, a religious organization, government, or other. For example, if a church or synagogue is vandalized and/or desecrated, the victim would be a religious organization.

According to HUD, Regional AIs should analyze *housing* related hate crimes; that is; where an event takes place at a residence, home or driveway. When hate crimes occur at a home, the victims can feel unwelcome and threatened. The victims may feel that they have no choice other than to move from the dwelling and neighborhood of their choice. It is under these circumstances that hate crimes create a lack of fair housing choice.

2. Hate Crime Events

Hate crime events were reviewed for the 5-year period from 2004 to 2008 as reported by Criminal Justice Statistics Center of the California Department of Justice. Table 5-9 shows the number of hate crime events by city during the five-year period. The annual average of events was 73 and, during the five-years there was a narrow low (69) to high (79) range. Except for the City of Huntington Beach, on a city-by-city basis, the number of hate crime events is low.

In 2008, according to the Orange County Human Rights Commission (OCHRC), there were 79 cases of hate crimes in Orange County, essentially unchanged from the 80 cases in 2007. Despite the fact that the African American population makes up less than 2% of Orange County's population, this group continues to be the most frequent target for hate crimes. Hate crimes against Latinos continues to increase. In fact, since 2006 there has been almost a 100% increase in the number of cases reported. After a four-year downward trend, hate crimes against Jews increased. Additionally, while there was a slight decrease in hate crimes reported against Gays and Lesbian, this group frequently underreports.

Table 5-10 shows the number of hate crime events by bias motivation for the period from 2004 to 2008. Almost two-thirds of all hate crime events in California had race/ethnicity/national origin as the bias motivation. Just over one-third of all hate crime events in the State have a anti-Black bias motivation. Sexual orientation and anti-religion were the bias motivation of 18.9% and 16%, respectively, of all hate crime events in California.

Table 5-9
Regional Analysis of Fair Housing Impediments
Number of Hate Crime Events by
Jurisdiction/City-2004 to 2008

City/Jurisdiction	2004	2005	2006	2007	2008	Average	Percent
Sheriff's Department	9	2	0	5	6	4.4	6.0%
Aliso Viejo	0	1	1	1	0	0.6	0.8%
Anaheim	6	3	6	4	3	4.4	6.0%
Brea	0	3	3	1	1	1.6	2.2%
Buena Park	0	1	0	1	1	0.6	0.8%
Costa Mesa	1	0	3	0	2	1.2	1.6%
Cypress	1	1	0	2	2	1.2	1.6%
Dana Point	0	0	0	1	0	0.2	0.3%
Fountain Valley	3	0	8	2	1	2.8	3.8%
Fullerton	2	2	4	2	1	2.2	3.0%
Garden Grove	6	6	9	9	4	6.8	9.3%
Huntington Beach	11	27	11	9	9	13.4	18.3%
Irvine	3	2	5	2	9	4.2	5.7%
La Habra	3	2	0	3	4	2.4	3.3%
Laguna Beach	2	0	1	0	1	0.8	1.1%
Laguna Hills	1	3	1	1	1	1.4	1.9%
Laguna Niguel	0	0	1	0	0	0.2	0.3%
Lake Forest	3	0	1	0	0	0.8	1.1%
Los Alamitos	0	1	2	5	1	1.8	2.5%
Mission Viejo	1	1	2	0	3	1.4	1.9%
Newport Beach	4	5	2	7	7	5.0	6.8%
Orange	0	2	5	4	3	2.8	3.8%
Placentia	0	1	2	0	0	0.6	0.8%
Rancho Santa Margarita	2	2	2	1	0	1.4	1.9%
San Clemente	1	2	1	2	1	1.4	1.9%
San Juan Capistrano	0	0	0	2	0	0.4	0.5%
Santa Ana	2	4	3	0	1	2.0	2.7%
Stanton	0	0	0	3	1	0.8	1.1%
Tustin	0	0	0	1	4	1.0	1.4%
Villa Park	1	1	0	0	0	0.4	0.5%
Westminster	6	4	4	0	2	3.2	4.4%
Yorba Linda	3	2	0	1	0	1.2	1.6%
CSU Fullerton	0	0	1	1	1	0.6	0.8%
UC Irvine	0	1	0	0	0	0.2	0.3%
Total	71	79	78	70	69	73	100.0%

Source: California Department of Justice, Division of California Justice Information Services, Bureau of Criminal Information and Analysis, Criminal Justice Statistics Center "Hate Crimes in California, 2004, 2005, 2006, 2007 and 2008"

Table construction by Castañeda & Associates

Table 5-10
State of California
Hate Crimes Events and Bias Motivation

Bias Motivation	2004	2005	2006	2007	2008	Average	Percent
Total	1,409	1,397	1,306	1,426	1,397	1,387	100.0%
Race/Ethnicity/National Origin	921	916	844	932	800	883	63.7%
Anti-White	61	77	64	73	42	63	4.5%
Anti-Black	500	490	462	498	457	481	34.6%
Anti-Hispanic	138	147	153	160	147	149	10.7%
Anti-American Indian/Alaska Native	3	2	4	1	1	2	0.1%
Anti-Asian/Pacific Islander	69	50	52	53	37	52	3.7%
Anti-Multiple Race Groups	45	61	45	51	47	50	3.6%
Anti-Other Ethnicity/National Origin	105	89	94	96	69	91	6.5%
Religion	205	205	205	203	294	222	16.0%
Anti-Jewish	142	141	129	134	184	146	10.5%
Anti-Catholic	9	10	11	10	12	10	0.7%
Anti-Protestant	3	10	13	11	8	9	0.6%
Anti-Islamic (Muslim)	29	12	14	13	11	16	1.2%
Anti-Other Religion	19	25	23	24	63	31	2.2%
Anti-Multiple Religious, Group	3	6	14	9	15	9	0.7%
Anti-Atheism/Agnosticism/etc.	0	1	1	2	1	1	0.1%
Sexual Orientation	263	255	246	263	283	262	18.9%
Anti-Gay	188	161	163	132	154	160	11.5%
Anti-Lesbian	37	40	23	26	22	30	2.1%
Anti-Gay and Lesbian	36	49	57	101	102	69	5.0%
Anti-Heterosexual	1	1	0	2	3	1	0.1%
Anti-Bisexual	1	4	3	2	2	2	0.2%
Physical/Mental Disability	4	3	3	3	4	3	0.2%
Anti-Physical Disability	2	3	1	2	2	2	0.1%
Anti-Mental Disability	2	0	2	1	2	1	0.1%
Gender	16	18	8	25	16	17	1.2%
Anti-Male	1	1	0	0	0	0	0.0%
Anti-Female	0	4	0	2	3	2	0.2%
Anti-Transgender	15	13	8	23	13	14	1.0%

Source: California Department of Justice, Division of California Justice Information Services, Bureau of Criminal Information and Analysis, Criminal Justice Statistics Center "Hate Crimes in California, 2007 and 2008"
Table construction by Castañeda & Associates

Table 5-11 shows the hate crime bias motivation in 2007 and 2008, according to the Orange County Human Relations Commission.

Table 5-11
Hate Crimes in Orange County 2007 and 2008

Basis of Bias	2007	Percent	2008	Percent
African American	18	22.4%	23	29.0%
Latino	12	15.0%	15	19.0%
Gay/Lesbian	14	17.4%	11	13.9%
Jewish	7	8.8%	10	12.7%
Muslim/Middle Eastern	4	5.0%	4	5.1%
Christian	7	8.8%	1	1.3%
Asian	2	2.5%	2	2.5%
White	3	3.8%	0	0.0%
Multiple	13	16.3%	13	16.5%
Total	80	100.0%	79	100.0%

Source: Orange County Human Relations Commission, *2008 Orange County Hate Crime Report*
Table construction by Castañeda & Associates

According to the OCHRC, there was an increase in crimes occurring at residential locations, the majority of which involved vandalism. One-third of the hate crimes reported in 2007 were at a residential location. That number increased to 40% in 2008. There was a significant increase in the number of hate crimes taking place on school campuses. Again the majority of these were acts of vandalism. More than one half of all hate crimes reported in both 2007 and 2008 involved acts of destruction or vandalism. The vandalism most frequently involved graffiti.

The California DOJ reports the location of hate crime events for the entire state by 25 categories (e.g., church, park, college, etc). Table 5-12 indicates the location of hate crimes for the period from 2004 to 2008. During the past five years two locations are predominant, accounting for about 60% of all hate crime locations: Highway/Road/Alley/Street (29.1%) and Residence/Home/Driveway (29.7%).

The application of the statewide housing location average of 29.7% to the annual Orange County average of hate crime events of 73 yields an estimate of 22 annual events occurring at a residence, home or driveway. The application of the 40% factor cited by the OCHRC yields an estimate of 29 events occurring at a housing location.

On an individual city basis, the number of hate crime events occurring at a *housing* location is small. However, the number at the countywide level is significant and, as a result, the resources to monitor and alleviate this impediment are best handled at the regional level. The agencies best equipped to assist cities to ameliorate and reduce the impact of hate crimes on families already living in their neighborhood of choice include:

- Fair Housing Council of Orange County
- Orange County Human Relations Commission
- Center OC
- Orange County Victim Assistance Partnership

Table 5-12
State of California
Location of Hate Crimes- 2004 to 2008

Location	2004	2005	2006	2007	2008	Average	Percent
Total	1,770	1,691	1,702	1931	1,397	1,698	100.0%
Air/Bus/Train Terminal	31	17	6	16	14	17	1.0%
Bank/Savings and Loan	3	4	2	3	2	3	0.2%
Bar/Night Club	27	24	21	41	25	28	1.6%
Church/Synagogue/Temple	74	84	84	72	107	84	5.0%
Commercial/Office Building	48	38	30	38	32	37	2.2%
Construction Site	3	1	3	3	2	2	0.1%
Convenience Store	27	27	12	7	9	16	1.0%
Department/Discount Store	10	9	4	10	7	8	0.5%
Drug Store/Dr.'s Office/Hospital	11	6	5	5	5	6	0.4%
Field/Woods/Park	31	38	38	83	41	46	2.7%
Government/Public Building	10	17	25	29	29	22	1.3%
Grocery/Supermarket	11	14	11	18	8	12	0.7%
Highway/Road/Alley/Street	536	456	545	569	363	494	29.1%
Hotel/Motel/etc	13	8	9	10	7	9	0.6%
Jail/Prison	18	14	10	33	17	18	1.1%
Lake/Waterway/Beach	12	15	9	11	4	10	0.6%
Liquor Store	4	7	5	11	1	6	0.3%
Parking Lot/Garage	86	138	135	117	110	117	6.9%
Rental Storage Facility	3	0	0	0	0	1	0.0%
Residence/Home/Driveway	551	511	504	571	388	505	29.7%
Restaurant	49	48	40	48	42	45	2.7%
School/College	155	176	152	182	148	163	9.6%
Service/Gas Station	11	11	7	13	13	11	0.6%
Specialty Store (TV, Furn, etc.)	38	19	12	13	4	17	1.0%
Other/Unknown	8	9	33	28	19	19	1.1%

Source: California Department of Justice, Division of California Justice Information Services, Bureau of Criminal Information and Analysis, Criminal Justice Statistics Center "Hate Crimes in California, 2007 and 2008"

Table construction by Castañeda & Associates

3. Actions to be Taken

During the five-year of the Fair Housing Action Plan, the FHCOC will take the following actions:

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

(Attachment B provides definitions of key hate crime terms such as bias, event, physical and mental disability bias, and victim.)

F. UNFAIR LENDING

1. Fair Housing Act, Equal Credit Opportunity Act and the California Holden Act

In cases involving discrimination in mortgage loans or home improvement loans, the United States Department of Justice may file suit under both the Fair Housing Act and the Equal Credit Opportunity Act.

Section 805 of the Fair Housing Act (42 U.S.C. 3605) states that it is “unlawful for any person or other entity whose business includes ... the making or purchasing of loans or providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling... to discriminate against any person...because of race, color, religion, sex, handicap, familial status, or national origin.”

The Equal Credit Opportunity Act (ECOA) 15 U.S.C. 1691 *et seq.* prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age, because an applicant receives income from a public assistance program, or because an applicant has in good faith exercised any right under the Consumer Credit Protection Act.

To supplement federal legislation, state laws have been enacted to forbid the discriminatory practice known as “redlining,” a practice that results in blanket refusals by some lenders to make loans in whole neighborhoods or geographic areas. Redlining is illegal in California pursuant to the Housing Financial Discrimination Act of 1977 (Holden Act). (Health & Safety Code Section 35800-35833) The Holden Act prohibits the consideration of race, color, religion, sex, marital status, national origin, or ancestry in lending for the purchase, construction, improvement, or rehabilitation of housing. Further, lenders cannot deny loan applications because of ethnic composition, conditions, characteristics, or expected trends in the neighborhood or geographic area surrounding the property.

The Holden Act places restrictions on redlining by making it illegal for lenders to consider the racial, ethnic, religious, or national origin composition of a neighborhood or geographic area surrounding a housing accommodation.

To ensure that prospective borrowers are aware of their rights under this law, lenders must notify all applicants of the provisions of the Holden Act at the time of the loan application. The notice must include the address where complaints may be filed and where information may be obtained. The notice must be in at least 10-point type and also must be posted in a conspicuous location in the lender's place of business. A notice would state the following:

IT IS ILLEGAL TO DISCRIMINATE IN THE PROVISION OF OR IN THE AVAILABILITY OF FINANCIAL ASSISTANCE BECAUSE OF THE CONSIDERATION OF:

1. TRENDS, CHARACTERISTICS OR CONDITIONS IN THE NEIGHBORHOOD OR GEOGRAPHIC AREA SURROUNDING A HOUSING ACCOMMODATION UNLESS THE FINANCIAL INSTITUTION CAN DEMONSTRATE IN THE PARTICULAR CASE THAT SUCH CONSIDERATION IS REQUIRED TO AVOID UNSAFE AND UNSOUND BUSINESS; OR

2. RACE, COLOR, RELIGION, SEX, MARITAL STATUS, NATIONAL ORIGIN OR ANCESTRY

IT IS ILLEGAL TO CONSIDER THE RACIAL, ETHNIC, RELIGIOUS, OR NATIONAL ORIGIN COMPOSITION OF A NEIGHBORHOOD OR GEOGRAPHIC AREA SURROUNDING A HOUSING ACCOMMODATION OR WHETHER OR NOT SUCH COMPOSITION IS UNDERGOING CHANGE, OR IS EXPECTED TO UNDERGO CHANGE, IN APPRAISING A HOUSING ACCOMMODATION OR IN DETERMINING WHETHER OR NOT, OR UNDER WHAT TERMS AND CONDITIONS, TO PROVIDE FINANCIAL ASSISTANCE.

THESE PROVISIONS GOVERN FINANCIAL ASSISTANCE FOR THE PURPOSE OF THE PURCHASE, CONSTRUCTION, REHABILITATION, OR REFINANCING OF ONE-TO-FOUR-UNIT RESIDENCE.

2. Underwriting, Marketing and Pricing Discrimination

Unfair lending refers to underwriting, marketing, and pricing discrimination. Underwriting discrimination refers to the process of evaluating home purchase loan applicants and is measured by the outcome of that process – i.e., the approval/denial decision. Marketing discrimination is more commonly known as redlining where a lender is alleged to provide unequal access to credit because of the income, race or ethnicity of the residents in the area where the property is located. Pricing discrimination means that loans are approved but with higher fees and interest rates.

The *Regional AI* examines underwriting and marketing discrimination through the use of 2008 Home Mortgage Disclosure Act (HMDA) data. HMDA grew out of public concern over credit shortages in certain urban neighborhoods. Congress believed that some financial institutions had contributed to the decline of some geographic areas by their failure to provide adequate home financing to qualified applicants on reasonable terms and conditions. Thus, one purpose of HMDA is to provide the public with information that will help show whether financial institutions are serving the housing credit needs of the neighborhoods and communities in which they are located. The 1989 amendments to HMDA require the collection and disclosure of data about applicant and borrower characteristics to assist in identifying possible discriminatory lending patterns and enforcing antidiscrimination statutes.

Underwriting discrimination refers principally to loan denials because of the non-economic characteristics of the applicant (i.e., gender and race/ethnicity). HMDA requires lenders to report on the income of home purchase loan applicants. Income means the gross income used by the lenders to make a loan decision. Lenders also must report the race of the borrower according to five categories: American Indian/Alaskan Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. Two ethnic categories must be noted: Hispanic or Latino and Not Hispanic or Latino.

Marketing discrimination refers to loan denials because of the characteristics of the area in which the property is located. The following property location information is reported by lenders: Metropolitan Statistical Area, State, County and 2000 census tract. Lenders only report the location of the property and not, for example, the housing and population characteristics of the census tract in which the property is located.

Notably, sometimes both forms of discrimination - underwriting and marketing - are linked because a borrower's loan application could be denied because of both their characteristics and those of the neighborhood.

3. Home Mortgage Disclosure Act

HMDA requires lenders to report on the action taken on each loan application, as follows:

- Loan Originated
- Application Approved, Not Accepted
- Application Denied
- Application Withdrawn
- Filed Closed for Incompleteness

Many determinants of a loan decision – such as borrower credit history, debt-to-income-ratio and loan-to-value ratio - are not included in the HMDA data. Although the loan denial rates do not support definitive conclusions regarding discrimination on the bases of race or ethnicity, they are a useful screen to identify disparities in loan approval rates by the race and ethnicity of applicants and geographic markets where differences in denial rates warrant further investigation. Additionally, identifying census tracts/neighborhoods with high loan denial rates helps to target credit counseling and homebuyer education programs.

Underwriting discrimination is examined in the *Regional AI* by the loan denial rates experienced by home purchase loan applicants in Orange County and its cities. Marketing discrimination is examined by reviewing the denial rates at the census tract level and determining whether there is a correlation between high census tract denial rates and minority populations residing in those census tracts. It should be reiterated that HMDA data alone cannot be used to prove unlawful discrimination.

4. Analysis of 2008 HMDA Data

Three Technical Appendices contain the detailed HMDA data:

- Technical Appendix D – 2008 Home Mortgage Disclosure Act Data for Orange County
- Technical Appendix E – Loan Denial Rates for Census Tracts with a High Number of Loan Applications
- Technical Appendix F – FHA and Conventional Loan Denial Rates by City and Census Tract

a. Sources for the Analysis of the HMDA Data

The key sources for the analysis of the HMDA data include:

- Robert B. Avery, et.al., *The 2008 HMDA Data: The Mortgage Market during a Turbulent Year*, Federal Reserve Bulletin, October 2009
- Federal Reserve Board, *Frequently Asked Questions About the New HMDA Data*, April 3, 2006, 9 pages

- Paul Huck, Federal Reserve Bank of Chicago, *Home Mortgage Lending by Applicant Race: Do HMDA Data Figures Provide a Distorted Picture*, Housing Policy Debate, 2001, Volume 12, Issue 4, pages 719-736
- Mortgage Bankers Association, *Fair Lending and Home Mortgage Disclosure Act Guide*, Handbook 2008-1, 35 pages
- The Urban Institute, Kathryn L.S. Pettit and Audrey E. Drolesch, *A Guide to Home Mortgage Disclosure Act Data*, December 2008, 35 pages

b. Loan Denial Rates by Race/Ethnicity

Data on home purchase loan applications by the race/ethnicity of the *applicant* were calculated for the entire Orange County area. In order to determine the denial rate, only applications where a final determination was made were used. The loan denial rate is based on the number of loans denied as a percentage of loans originated + applications approved but not accepted + applications denied. Withdrawn or incomplete applications are not included in the denominator.

Of the 4,540 FHA loan applications, 47.4% (2,153) were made by White, Non-Hispanic applicants and 27.3% (1,239) were made by Hispanic borrowers. The White, Non Hispanic and Hispanic denial rates were 15.4% and 27.4%, respectively.

Race was unavailable for 459 applicants. The balance of the 689 loan applications were made by borrowers belonging to seven racial groups.

Black or African borrowers represented 2% of all FHA loan applicants. This racial group had a loan denial rate of 20.6%.

Detailed data are presented in Tables D-1 and D-2 in Technical Appendix D.

2008 HMDA data are available for almost 29,400 conventional loan applications. The racial/ethnic composition of the applicants was 45.3% White Non-Hispanic, 24.1% Asian, and almost 13% Hispanic. Almost one-third of Hispanic borrowers were denied compared to 17.9% of the Asian and 18.8% of the White, Non-Hispanic loan applicants.

Black or African borrowers represented 0.7% of all conventional loan applicants. This racial group had a loan denial rate of 27.6%.

Detailed data are presented in Table D-3 in Technical Appendix D.

c. Loan Denials by Income and Race/Ethnicity

1. *FHA Loan Applications:* Table 5-13 on the next page shows the four income categories reported in the HMDA data. The four income categories are expressed in terms of a percentage of the median income for Orange County.

Table 5-13
HMDA Census Tract
Income Categories – 2008

Census Tract Income Categories	Percent of Median MSA Income
Very Low	<50%
Low	>50% - <80%
Moderate	>80% - <120%
Above Moderate	120%+

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act
Table construction by Castañeda & Associates

Loan denial rates decrease as incomes increase. White, Non-Hispanic borrowers have lower loan denial rates than those experienced by other racial/ethnic groups. Table 5-14 shows the disparities in loan denial rates by income and race/ethnicity.

Almost one half (49%) of the 4,540 FHA loan applications were made by above moderate income borrowers. Within this income group, the majority of applications were made by White, Non-Hispanic borrowers who had a denial rate of 14.8%. Hispanic, Asian and Black/African American applicants all had loan denial rates of more than 20%.

About one-third of FHA applications were made by moderate income borrowers. Within this income group, White, Non-Hispanic and Hispanic borrowers had almost the same volume of loan applications. The Hispanic loan denial rate of 27.1% was considerably higher than the White Non-Hispanic denial rate of 13.6%. The Asian loan denial rate was 17.6%. The volume of loan applications by each of the other race/ethnicity groups was small.

About one-sixth of all FHA loan applications were made by low income borrowers. Within this income group, White, Non-Hispanic and Hispanic borrowers had almost the same volume of loan applications. The Hispanic loan denial rate of 32.2% was considerably higher than the White Non-Hispanic denial rate of 16.7%. The Asian loan denial rate was 33.3%. However, the number of loan applications made by Asians and each of the other race/ethnicity groups was small.

Very few (2.5%) applications were made by very low income borrowers.

Detailed data are presented in Table D-4 in Technical Appendix D.

Table 5-14
Orange County
Disparities in FHA Loan Denial Rates
By Income Group and Race/Ethnicity - 2008

Income Group	All ¹	White Non-Hispanic	Hispanic	Asian	Black/African American
Very Low	33.9%	20.0%	32.8%	NA	NA
Low	27.5%	16.7%	32.2%	33.3%	18.2%
Moderate	20.2%	13.6%	27.1%	17.6%	25.9%
Above Moderate	17.5%	14.8%	21.4%	22.5%	20.5%

¹All includes these other groups: Joint Hispanic, American Indian/Alaska Native, Native Hawaiian/Other Pacific Islander, 2 or More Minority Races, Joint White/Minority, and Race Not Available

Note: very few loans in the NA cells

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 5-1 Disposition of Applications for FHA, FSA/RHS and VA Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Income, Race and Ethnicity of Applicant, 2008

Table construction by Castañeda & Associates

2. *Conventional Loan Applications:* Conventional loan denial rates also decrease as incomes increase. However, Asian borrowers (with the exception of the very-low income category) have lower denial rates than White, Non-Hispanic borrowers. Hispanic borrowers have the highest loan denial rates experienced by the other racial/ethnic groups. In general, Black/African American borrowers had lower denial rates than Hispanic loan applicants. However, this population group comprised less than one percent of all loan applicants. Table 5-15 shows the disparities in loan denial rates by income and race/ethnicity.

Table 5-15
Orange County
Disparities in Conventional Loan Denial Rates
By Income Group and Race/Ethnicity – 2008

Income Group	All ¹	White Non-Hispanic	Hispanic	Asian	Black/African American
Very Low	36.4%	24.8%	44.9%	33.0%	NA
Low	21.7%	18.5%	30.0%	14.9%	47.2%
Moderate	20.4%	16.4%	32.9%	16.1%	19.4%
Above Moderate	20.3%	19.1%	31.5%	18.7%	23.9%

¹All includes these other groups: Joint Hispanic, American Indian/Alaska Native, Native Hawaiian/Other Pacific Islander, 2 or More Minority Races, Joint White/Minority, and Race Not Available

Note: very few loans in the N/A cell

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 5-2 Disposition of Applications for Conventional Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Income, Race and Ethnicity of Applicant, 2008

Table construction by Castañeda & Associates

Almost 60% of the 29,000 conventional loan applications were made by above moderate income borrowers. Within this income group, about one-half of applications were made by White, Non-Hispanic borrowers who had a denial rate of 19.1%. Within this income group, 21.4% of the conventional loan applications were made by Asian borrowers, who had a loan denial rate of 18.7%. Hispanic borrowers experienced a loan denial rate of 31.5% and comprised 7.4% of all above moderate income loan applicants.

About one-fourth of conventional loan applications were made by moderate income borrowers. Within this income group, the largest numbers of applicants were White, Non-Hispanic (39%); Asian (28%); and Hispanic (18%). The Hispanic loan denial rate of 32.9% was considerably higher than Asian denial rate of 16.1% and the White Non-Hispanic denial rate of 16.4%. The volume of loan applications by each of the other race/ethnicity groups was small.

About 13% of conventional loan applications were made by low income borrowers. Within this income group, the largest numbers of applicants were White, Non-Hispanic (34%); Asian (28%); and Hispanic (23%). The Hispanic loan denial rate of 30% was considerably higher than Asian denial rate of 14.9% and the White Non-Hispanic denial rate of 18.5%. The volume of loan applications by each of the other race/ethnicity groups was small.

Very few (3%) applications were made by very low income borrowers. Within this income group, the largest numbers of applications were made, in order, by White, Non-Hispanic, Hispanic and Asian borrowers. All racial/ethnic groups experience loan denial rates of more than 25%.

Detailed data are presented in Table D-5 in Technical Appendix D.

d. Loan Denials by Census Tract Characteristics of Income and Minority Concentration

HMDA data are available on the loan denials by two census tract characteristics - income categories and minority population concentration levels. The census tract characteristics are based on demographic information from Census 2000 and they are *not based on the applicant characteristics*. Minority means all races other than White and Whites of Hispanic or Latino Origin. Table 5-13 shows census tract income categories.

For FHA loans, the data reveal that very low income borrowers reside in census tracts where the minority population exceeds 80% of the population. In these very low income/high minority census tracts, 39% of the loan applications were denied. In low income neighborhoods, the loan denial rate increases as the minority population increases. In moderate and above moderate income neighborhoods, they do not always increase as the percentage of the minority population increases.

Detailed FHA loan data are presented in Table D-6 in Technical Appendix D.

For conventional loans, the data also reveal that very low income borrowers reside in census tracts where the minority population exceeds 80% of the population. In these neighborhoods, 36.2% of the loan applications were denied. In low income neighborhoods, the loan denial rates increase as the percentage of the minority population increases. For instance, in low income/<10% minority population neighborhoods, 2.6% of the loan applications are denied. In contrast, in low income/>80% minority population neighborhoods, 31.2% of the loan applications are denied. These numbers and percentages, though, need to be interpreted with caution.

because the number of applications for home purchases in <10% minority neighborhoods is very small.

In moderate income neighborhoods, denial rates generally increase as the percentage of the minority population increases. For example, in moderate income/<10% minority population neighborhoods, 13.7% of the loan applications are denied. By comparison, in moderate income/>80% minority population neighborhoods, 24.7% of the loan applications are denied. These numbers and percentages again need to be interpreted with caution because the number of applications for home purchases in <10% and > 80% minority neighborhoods is very small.

Detailed conventional loan data are presented in Table D-7 in Technical Appendix D.

Perhaps, more representative of Orange County is the loan applications for homes located in census tracts where the minority population ranges from 20%-79%. In fact, 73% of the 29,400 conventional loan applications were made in these census tracts. Table 5-16 shows that the denial rates in neighborhoods with 20%-79% minority populations are about the same for low and moderate income neighborhoods and somewhat lower for above moderate income neighborhoods.

Table 5-16
Orange County
Denial Rates for Neighborhoods with 20%-79%
Minority Populations by Income Level of Census Tracts - 2008

Census Tract Income Level	Number of Applications	Number Denied	Percent Denied
Low	4,911	1,080	22.0%
Moderate	8,321	1,729	20.8%
Above Moderate	8,133	1,432	17.6%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 7-1 Disposition of Applications for FHA, FSA/RHS and VA Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Characteristics of Census Tract in Which Property is Located, 2008. Table 7-2 Disposition of Applications for Conventional Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Characteristics of Census Tract in Which Property is Located, 2008
Table construction by Castañeda & Associates

e. Reasons for Loan Denial

Reasons for loan denial are summarized on a county-wide basis in Table D-8 in Technical Appendix D. There are eight “known” reasons for a loan denial and one “other” category. With respect to FHA loans, the most frequent reason for a loan denial was “debt-to-income ratio”. The percentage of loans denied for this reason ranged from 27.3% for Black or African American applicants to 57.1% for Native Hawaiian/Other Pacific Islander applicants. It must be noted, however, that there were few applications for these two groups. White and Hispanic/Latino applicants were denied because of debt to income ratio at nearly the same percentages - 37.9% and 40.2% respectively.

The second most frequent known reason for denial of FHA loan applications was credit history. These denials ranged from a low of 7.1% for joint applicants to 22.7% for Black/African American applicants. Again there were few applications for these groups. Credit history was the reason for denial for 13.3% of White applicants and 16.0% of Hispanic applicants.

Similar to FHA loans, conventional loans were most frequently denied due to “debt-to-income” ratio as the known reason. These denials ranged from 20.9% for Asian applicants to 40.0% for applicants of two or more races. There were, however, only five applications denied for the group two or more races. Nearly 4,100 White applicants were denied conventional loans with 23.1% denied due to “debt-to-income ratio”. Hispanic applicants were slightly lower at 21.1%. Unlike FHA loans however, the second most frequent known reason for denial in most instances is “collateral”. Nearly 20% of the joint applicants, 15.4% of Asian applicants and 10.3% of the Hispanic applicants were denied due to “collateral”. It is unclear exactly what “collateral” encompasses; however, it could refer to declining home values and the inability for homes to meet appraisal requirements.

About 9,250 refinance loans were denied for White applicants. About one half of the loans were denied because of “debt-to-income” or “collateral” reasons. More than half of the refinance applications for Asian and Hispanic applicants were denied for these two reasons. For seven out of the 10 groups, “collateral” was more frequently the reason for denial rather than “debt-to-income”. Again this may be due to homes not meeting appraisal requirements.

County-wide there are relatively few home improvement loan applications. The two most frequent reasons for loan denial for most groups was “debt-to-income” and “credit history”.

f. Association of High Denial Rates and Minority Population Concentrations

As previously noted, HMDA was designed so that the public and regulators could better determine whether or not *individuals* or specific *neighborhoods* were being unfairly denied access to credit. A fair housing issue is whether there is an association between neighborhoods with high minority population concentrations and high denial rates. That is, *do applicants for home purchases in minority neighborhoods experience high loan denial rates compared to applicants in non-minority neighborhoods?*

This issue was examined for the following:

- Entitlement and Urban County census tracts with 15 or more FHA loan applications
- Entitlement and Urban County census tracts with 50 or more conventional loan applications
- Percent minority population for each census was determined
- Census tracts were ranked ordered in terms of denial rates (high to low)

A preliminary analysis was completed to determine if race/ethnicity is associated with the denial of loan applications. The percent minority, percent of the median county income, and the loan denial rates were determined for each census tract in Orange County where there was loan activity in 2008.

The initial analysis indicated that there was no relationship between the percent minority in a census tract and the percent of loans that were denied in that census tract. However, inspection of the data suggested that there were some confounding factors in that there were

high denial rates in very high income areas. Often these areas have loan applications for very large sums of money to finance the purchase of very expensive homes. Although the loan amount was not in the data set, there was a “proxy” variable in the income of the census tract. It was assumed that higher income areas were more likely to have more expensive homes.

A second regression analysis was conducted only on those areas where the median income was at or below 100% of the median income. Focusing on this sub-sample of the data did reveal a relationship between denial rates and percent minority. The R^2 value was .2 which is statistically significant. Another regression analysis was performed on a subset of the data where the income was at 80% or below the median income. The resulting R^2 was .33.

[The value r^2 is a fraction between 0.0 and 1.0, and has no units. An r^2 value of 0.0 means that knowing X does not help you predict Y. There is no linear relationship between X and Y, and the best-fit line is a horizontal line going through the mean of all Y values. When r^2 equals 1.0, all points lie exactly on a straight line with no scatter. Knowing X lets you predict Y perfectly.]

The results suggested that further analysis was warranted. Each record in the HMDA Loan Application Register includes the Census Tract Minority Population Percentage and the Census Tract Percentage of the Metropolitan Statistical Area Median Family Income, as well as the loan amount. An analysis was completed to determine if race/ethnicity is associated with the denial of loan applications. Two types of loans applications were considered in the analysis: (1) home purchases with conventional loans and (2) home purchases with FHA loan.

A logit regression was used to “predict” if a loan was denied based on the minority population and income ratio of the census tract, as well as the loan amount. These variables were chosen because the results of a preliminary analysis utilizing census tract level data suggested each of these variables were influencing denials. Each of the three variables was significant predictors of loan denials for conventional loan applications, while the percent minority and the income ratio of a census tract were significant predictors of denials for FHA loan applications.

The key to logit regression is the analysis of maximum likelihood estimates. It estimates the log odds of an event occurring (loan denial) given a one unit increase in a variable. The statistical significance of these log odds are measured using a Wald chi-square, which would be zero or near zero if the two events and the predictor variable were independent. The chi-square values are presented in Table 5-17.

Table 5-17
Analysis of Maximum Likelihood Estimates

Parameter	Conventional Loans		FHA Loans	
	Wald Chi-Square	Pr >Chi-Square	Wald Chi-Square	Pr >Chi-Square
Percent Minority Population	39.99	<.0001	24.05	<.0001
Tract to MSA Median Family Income	8.83	0.003	4.05	0.0441
Loan Amount	114.57	<.0001	0.73	0.3935

By way of elaboration, the logit regression is based on the probability of an event occurring, i.e. loan denial. It measures the likelihood that the probability of the event increases as the independent variables increase. For conventional loans, the probability of a loan being denied increased as the percentage *minority population* in the census tract *increased*, as the *income increased* the probability of a denial *decreased*, and as the *amount of the loan increased* the probability of a loan denial *increased*.

It should be noted that the association analysis suffers because the data sets are from two different points in time: loan activity in 2008 and minority population characteristics per Census 2000. Since 2000, the census tract income, racial and ethnic characteristics are likely to have changed since the time the census data was collected. With more current data, a more robust analysis of the relationship between the probability of a denial and the independent variables can be developed.

Consequently, a more definitive analysis should be conducted when the 2010 census tract information is available on income, racial and ethnic characteristics. HMDA data for 2010 will be available in September 2011.

5. Actions to be Taken

A summary of the examination of the 2008 HMDA data is given below:

- Disparities exist in loan approval/denial rates among the racial and ethnic borrowers. In particular, Hispanic applicants have higher loan denial rates than White, Non-Hispanic borrowers.
- Black/African American borrowers also have high loan denial rates compared to White alone loan applicants.
- Loan denial rates in neighborhoods with 20%-79% minority populations are about the same regardless of census tract income level (low, moderate and above moderate).
- Unfair lending is manifested more in the loan denial disparities experienced by different racial/ethnic borrowers than by the denial rate disparities experienced in neighborhoods with 20%-79% minority populations, regardless of income.

Unfair lending is a fair housing issue best addressed at the regional level rather on a city-by-city basis. The FHCOC will undertake the following actions during the 2010-2015 period:

- Monitor the HMDA data annually using the 2008 HMDA analysis as a benchmark.
- Complete a HMDA analysis of the top 10 lenders in Orange County to compare and contrast loan denial rates.
- 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.

- Conduct outreach to cultural, ethnic and minority organizations to potentially increase interest and readiness in home purchases.
- 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.

Attachment A
California Newspaper Publishers Association
Guidance on Advertising Words and Phrases

The Civil Rights Act of 1968 is a federal law that prohibits discrimination in many different sectors, including housing and employment. Title VIII of the Civil Rights Act of 1968 is the section that is popularly referred to as the Fair Housing Act, and applies to everyone in the United States. Title VIII [42 U.S.C. Section 3604 9(c)] as amended, makes it unlawful to:

Make, print, or publish, or cause to be made, printed or published any notice, statement or advertisement, with respect to the sale or rental of a dwelling that indicated any preference, limitation, or discrimination based on *race, color, religion, sex, handicap, familial status, or national origin*, or an intention to make any such preference, limitation, or discrimination.

California has enacted a similar anti-discrimination provision. California Government Code Section 12955 (a), part of the Fair Employment and Housing Act, makes it unlawful:

For the owner of any housing accommodation to discriminate against any person because of the *race, color, religion, sex, marital status, national origin, ancestry, familial status, sexual orientation, source of income, or disability* of that person.

California Government Code Section 12955 (c) further makes it unlawful:

For any person to make, print, or publish, or cause to be made, printed or published any notice, statement or advertisement, with respect to the sale or rental of housing that indicates any preference, limitation, or discrimination based on *race, color, religion, sex, marital status, national origin, ancestry, familial status, disability, sexual orientation, source of income*, or an intention to make any such preference, limitation, or discrimination.

California's Unruh Civil Rights Act (Civil Code Section 51 et. seq.) further prohibits discrimination in housing based on age. The Act has also been interpreted by the courts in California to protect individuals based on sexual orientation. More broadly, the Unruh law prohibits discrimination based on any of the characteristics listed above as well as any other arbitrary basis.

The FEHA expressly incorporates the anti-discrimination housing provisions (Government code Section 12955[d]).

1. Race / Color / National Origin / Ancestry

These four classes are generally discussed together. Race and color refer to a person's skin color and to ethnological (e.g. Asian, African American) as well as unscientific distinctions (e.g. "Middle Eastern"). National origin and ancestry refer to one's country of origin and ethnic heritage.

The following are some words and terms that state and federal regulators discourage because they discriminate based on race, color, ancestry, or national origin: *white, black, asian,*

integrated, restricted, private, board approval, ethnic landmarks, executive, exclusive, membership approval, a specific nationality such as Chinese and any specific race.

Federal and state regulations and guidelines discourage words and terms such as “membership approval,” “restricted,” “integrated,” and “exclusive.” These and other words and phrases may be discriminatory, according to regulators, because someone reading the advertisement is likely to believe that people of a certain race or national origin will be preferred over others in the sale or rental of the advertised housing.

2. Sex

Discrimination on the basis of sex protects both men and women. It is illegal to specify either “male “preferred” or “female preferred.” No preference on the basis of sex should be stated in an advertisement. DFEH stated that terms such as “bachelor pad,” “granny flat,” “mother-in-law suite” and others are commonly used as physical descriptions of housing units do not violate the Act.

3. Disability

The following are a few of the words and phrases that federal regulations state convey an overt or tacit discriminatory preference and should be avoided: *crippled, blind, deaf, mentally ill, retarded, impaired, alcoholic, handicapped, able-bodied, and physically fit.*

Physical descriptions of property (e.g. “great view,” “walk-in closet” and second floor walk-up”) or descriptions of services or facilities (e.g. “jogging trails”) are not facially discriminatory

4. Marital Status/Familial Status

Marital status, as the term suggests, protects people from discrimination based on whether or not they are married. Familial status refers to whether or not an individual has minor children living with them.

Words and phrases that, according to state and federal regulators, bring up the issue of discrimination on the basis of marital or familial status: *retired, one child, one person, number of people, family, (“great for family,” etc.) family park, adult, adults only, children, single, single person, student, two people, seniors, senior discount, couples (e.g. “ideal for couples”), and older person.*

Advertisements which describe the property being advertised or the services or facilities available at the property are generally considered to be acceptable. Examples include “family room” and “playground”

It may be unlawful to limit the number of persons who can live in a housing unit if it would have the effect of discriminating on the basis of familial or marital status.

CNPA recommends rejecting any advertisement that limits the number of occupants, even where the owner specifies that the limitation is required by local law. The reason is that a newspaper publisher cannot investigate the facts surrounding every proposed advertisement to determine if the advertiser’s claim is correct.

5. Religion

Discrimination in housing on the basis of religion is prohibited under both state and federal law. According to the state Guidance Memorandum, “advertisements should not contain an explicit preference, limitation or discrimination on account of religion (i.e. “no Jews,” “Christian home”).” Some of the words and phrases that regulators say may draw a complaint based on religious discrimination include *Jewish, Mormon Temple, Catholic Church, Christian home, religious name, any religious landmark*.

6. Sexual Orientation

Any reference to an individual’s sexual orientation, e.g. lesbian, gay, and straight, etc. should be eliminated from housing ads.

Publishing an ad that says, “lesbian, vegetarian seeking roommate,” would expressly indicate a preference for a person on the basis of her sexual orientation.

7. Age

Federal regulations specify that unless the housing being offered meets government requirements for “senior” or “senior only” housing, advertisers may not express a preference or limitation on the basis of age.

Federal and state guidance memorandums specifying that if an advertiser represents to the newspaper that the housing meets the requirements of “senior housing,” the newspaper is allowed to rely on the representation.

Attachment B **Hate Crimes Glossary**

Bias – A preformed negative opinion or attitude toward a group of persons based on their race, ethnicity, national origin, religion, gender, sexual orientation and/or physical/mental disability.

Ethnic Bias – A preformed negative opinion or attitude toward a group of persons of the same race or national origin that share common or similar traits in language, custom, and tradition, such as Arabs or Hispanics.

Event – An event is an occurrence where a hate crime is involved. (In this DOJ report, the information about the event is a crime report or source document that meets the criteria for a hate crime.) There may be one or more suspects involved, one or more victims targeted, and one or more offenses involved for each event.

Known Suspect(s) – A suspect can be any person alleged to have committed a criminal act(s) or attempted criminal act(s) to cause physical injury, emotional suffering, or property damage. The known suspect category contains the number of suspects that have been identified and/or alleged to have committed hate crimes as stated in the crime report. For example, witnesses observe three suspects fleeing the scene of a crime. The word “known” does not necessarily refer to specific identities.

Offenses – Offenses that are recorded are as follows; murder, forcible rape, robbery, aggravated assault, burglary, larceny-theft, motor vehicle theft, arson, simple assault, intimidation, and destruction/vandalism as defined in the national UCR and the national Hate Crimes Statistics Report.

Physical/Mental Disability Bias – A preformed negative opinion or attitude toward a group of persons based on physical or mental impediments/challenges, whether such disabilities are congenital or acquired by heredity, accident, injury, advanced age, or illness.

Racial Bias – A preformed negative opinion or attitude toward a group of persons such as Asians, blacks, or whites, based on common physical characteristics.

Religious Bias – A preformed negative opinion or attitude toward a group of persons that share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being, such as Catholics, Jews, Protestants, or Atheists.

Sexual-Orientation Bias – A preformed negative opinion or attitude toward a group of persons based on sexual preferences and/or attractions toward and responsiveness to members of their own or opposite sexes.

Victim – A victim may be an individual, a business or financial institution, a religious organization, government, or other. For example, if a church or synagogue is vandalized and/or desecrated, the victim would be a religious organization.



Section 6

Public Sector Fair Housing Analysis

SECTION 6

PUBLIC SECTOR FAIR HOUSING ANALYSIS

A. INTRODUCTION

The United States Department of Justice has indicated a major focus of its efforts is on public sector impediments that may restrict housing opportunities for disabled persons. The Department has stated:

The Division's enforcement of the Fair Housing Act's protections for persons with disabilities has concentrated on two major areas. One is insuring that zoning and other regulations concerning land use are not employed to hinder the residential choices of these individuals, including unnecessarily restricting communal, or congregate, residential arrangements, such as group homes. The second area is insuring that newly constructed multifamily housing is built in accordance with the Fair Housing Act's accessibility requirements so that it is accessible to and usable by people with disabilities, and, in particular, those who use wheelchairs.

Source: United States Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, *The Fair Housing Act*, July 25, 2008, page 4

California's Fair Employment and Housing Act states that it is unlawful:

To discriminate through *public* or private *land use practices, decisions, and authorizations* because of race, color, religion, sex, sexual orientation, familial status, marital status, disability, national origin, source of income, or ancestry. Discrimination includes, but is not limited to, restrictive covenants, *zoning laws, denials of use permits, and other actions authorized under the Planning and Zoning Law* (Title 7 (commencing with Section 65000)), that make housing opportunities unavailable. [emphasis added]

The analysis of public sector impediments involves following:

- A description of the actions taken by the County's four housing authorities to affirmatively further fair housing
- A description of the housing authorities policies on reasonable physical modifications and reasonable accommodations
- A discussion on the most frequent land use and zoning impediments identified by the Entitlement Cities and the County of Orange
- An identification of the land use and zoning impediments identified by each participating Entitlement City and the County of Orange
- A description of the actions to be taken by the FHCOC and the participating jurisdictions to ameliorate or eliminate public sector impediments

B. DESCRIPTION OF HOUSING AUTHORITY FAIR HOUSING POLICIES

Orange County's four housing authorities provide rental assistance through the Housing Choice Voucher Program (HCVP) to an estimated 21,000 households. 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 FHCOC.

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 Eight 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% or greater. The Orange County Housing Authority has consistently received five bonus points in SEMAP for de-concentration.

1. Fair Housing Policies of Housing Authorities

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

a. 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.

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

b. 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.

c. 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.

d. 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*.

2. Section 8 Housing Policies on Reasonable Physical Modifications and Reasonable Accommodations

Question #8 of the *Zoning and Planning Survey* (Attachment A) asks:

If the jurisdiction supplies or manages housing, is there a clear policy to allow disabled persons residing in or seeking to reside in the housing to make or request reasonable physical modifications or to request reasonable accommodations?

As previously noted, four housing authorities administer the Section 8 Housing Choice Voucher Program:

- Anaheim Housing Authority
- Garden Grove Housing Authority
- Santa Ana Housing Authority
- Orange County Housing Authority

The Anaheim Housing Authority administers about 6,300 Section 8 Housing Choice Voucher units. As a consequence, this rental assistance program represents a significant segment of the rental housing market.

The Garden Grove Housing Authority administers about 2,500 Section 8 Housing Choice Voucher units. Of this total, 2,026 Section 8 families reside in rental housing located in Garden Grove, a number that represents 10% of the City's rental housing stock.

The Santa Ana Housing Authority administers about 2,600 Section 8 Housing Choice Voucher units.

The Orange County Housing Authority administers about 9,600 Section 8 Housing Choice Vouchers. The housing units are located in the unincorporated area and 31 participating cities in Orange County.

HUD stipulates a number of reasonable accommodations that can be made available to persons with disabilities who are recipients of Housing Choice Vouchers. Examples of the types of accommodations include:

- Approval to perform annual reexaminations of household income by telephone
- Approval to add a live-in aide/care provider
- Approval to rent a unit owned by a relative
- Approval of an extra bedroom for large, intrusive medical equipment
- Approval to use a voucher in special housing types such as shared housing, group homes, congregate housing and assisted living

Each housing authority has adopted policies - as part of their Administrative Plans - related to persons with disabilities, including reasonable accommodation. For example, the Anaheim Housing Authority has the following policy:

If you or anyone in your family is a person with disabilities, and you require specific accommodation in order to fully utilize our programs and services, please contact the housing authority.

Another example is the Garden Grove Housing Authority policy which states:

The GGHA shall make reasonable adjustments to their rules, policies, practices and procedures in order to enable an applicant or participant with a disability to have an equal opportunity to access the HCVP. If providing the accommodations would result in a fundamental alteration in the nature of the HCVP or an undue financial or administrative burden, then the GGHA need not provide the accommodation, however it may present an alternate accommodation that will still meet the need of the person. An undue administrative burden is one that requires a fundamental alteration of the essential functions of the GGHA (i.e., waiving a family obligation). An undue financial burden is one that when considering the available resources of the agency as a whole, the requested accommodation would pose a severe financial hardship on the GGHA.

A participant with a disability must request a change to a policy or practice as an accommodation of his or her disability before the GGHA will treat a person differently than anyone else. The GGHA's policies and practices will be designed to provide assurances that persons with disabilities will be given reasonable accommodations, upon request, so that they may fully access and utilize the housing program and related services. This policy is intended to afford persons with disabilities an equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement as those who do not have disabilities.

3. Fair Housing and Lead-Based Paint

The issue of lead based paint in housing is recognized as a fair housing concern because of the overconcentration of housing containing lead based paint in very low and low income neighborhoods coupled with the over concentration of protected classes residing in these neighborhoods. Lead based paint also is a fair housing issue because it relates especially to rental housing for children. Under the Fair Housing Act, it is illegal to not rent to families unless the housing is exempt because it is housing for older persons.

The Orange County Childhood Lead Poisoning Prevention Program (CLPPP) explains that high blood lead levels are a concern because they may cause harmful effects to a child's developing organ systems such as the kidneys, brain, liver, and blood-forming tissues. This may affect a child's ability to learn. Very high blood levels can cause devastating health consequences, including seizures, coma, and even death. Children are much more vulnerable to lead poisoning than adults because they put many kinds of items into their mouths. Their bodies absorb up to 40% of the lead with which they come into contact as opposed to only 10% absorbed by adults. Lead enters the body through breathing or ingestion. Some possible sources of lead include

- Living in an older home painted with lead-based paint
- Ceramic pottery
- Lead-based paint dust from a household contact's work clothing
- A home remedy
- A crib painted with lead-based paint

The CLPPP follows children with abnormal or high blood lead levels. CLPPP receives reports of abnormal lead results from the State, laboratories, or physicians/clinics who have ordered the test.

In order to better protect children and families against lead poisoning; in 1999 HUD instituted revised lead-based paint regulations focused on the following five activities:

- Notification – disclosure, distribution of pamphlet, notice of lead hazard evaluation or presumption, and notice of lead hazard reduction activity
- Lead Hazard Evaluation – visual assessment, paint testing, and risk assessment or lead hazard screen
- Lead Hazard Reduction – paint stabilization, interim controls, and abatement
- Ongoing Maintenance – inspect and maintain lead hazard reduction work
- Response to Children with Environmental Intervention Blood Lead Level – sharing and comparing information, risk assessment, interim controls or abatement, and notices of disclosure

On April 22, 2008, EPA issued a rule requiring the use of lead-safe practices and other actions aimed at preventing lead poisoning. Under the rule, beginning in April 2010, contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination. Starting on April 22, 2010, the rule affected paid renovators who work in pre-1978 housing and child-occupied facilities, including:

- Renovation contractors
- Maintenance workers in multi-family housing
- Painters and other specialty trades

Under the rule, child-occupied facilities are defined as residential, public or commercial buildings where children under age six are present on a regular basis. The requirements apply to renovation, repair or painting activities. The rule does not apply to minor maintenance or repair activities where less than six square feet of lead-based paint is disturbed in a room or where less than 20 square feet of lead-based paint is disturbed on the exterior. Window replacement is not minor maintenance or repair.

HUD has indicated that lead-based paint in assisted housing occupied by families with children is a fair housing concern. The County's four housing authorities provide rental assistance to a combined total of about 21,000 households/housing units. Many of the assisted households are families with children. Efforts to reduce lead based paint hazards are integrated into the County's four housing authority's administrative procedures. For example, as of May, 2010 the Orange County Housing Authority was assisting 1,226 families that include one or more children under the age of six. The Housing Authority developed a report listing the address of the assisted units with children under the age of six. The County's Health Care Agency (HCA) then compared the assisted unit addresses with the address of any children in their records that had an elevated blood level. HCA completed a check of current, open State-defined cases against OCHA's list. These are children with one blood lead level (BLL) of 20 mcg/dL or greater or two BLLs of 15-19 mcg/dL. There have been no matches at this time. HCA is continuing to compare the addresses for other identified elevated blood lead levels for those addresses.

C. DESCRIPTION OF CITY AND COUNTY PUBLIC SECTOR IMPEDIMENTS

As part of the preparation of an *Analysis of Impediments to Fair Housing Choice* participating cities responded to a 24-question survey 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. The survey 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. 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.

Attachment A is the complete *Survey of Zoning and Planning Codes, Policies and Practices That May Pose an Impediment to Fair Housing Choice*. The survey provides background information that explains the fair housing issues and concerns posed by each question. Three examples of background information are provided below:

- The *City of Santa Barbara v Adamson* case explains why cities should not have a definition of “family” that restricts housing opportunities for disabled persons living in a group home.
- The *U.S. ex re. Anti-Discrimination Center v. Westchester County* indicates that in appropriate circumstances affordable housing can be a tool to address a lack of fair housing choice in highly segregated communities.
- The Housing for Older Persons Act explains the conditions under which senior housing is exempt from the prohibition against familial discrimination.

Chart 6-1 on the next page lists the 24 topics/questions included in the *Survey of Zoning and Planning Codes, Policies and Practices*.

The results of the *Zoning and Planning Survey* are presented in the following pages. The analysis is presented in two parts:

- First, a summary is presented of public sector impediments that are common to most participating jurisdictions.
- Second, the public sector impediments unique to each participating jurisdiction are identified.

Chart 6-1
Orange County Regional Analysis of Impediments to Fair Housing Choice
Topics Included in the Survey of Zoning and Planning Codes, Policies and Practices
That May Pose an Impediment to Fair Housing Choice

1. Lack of a Family Definition Consistent with Fair Housing Laws
2. Mischaracterize Housing for the Disabled as "Boarding or Rooming house"
3. Lack of a Definition of Disability Consistent with Fair Housing Laws
4. Treating Housing for Disabled Persons Differently than Other Housing
5. Restrict On-Site Supportive Services for Housing for Disabled Persons
6. Occupancy Limits on Housing for Disabled Persons
7. Lack of a Reasonable Accommodation Procedure
8. Lack of Reasonable Modifications/Accommodations in Section 8 Housing
9. Public Hearing Requirements on Requests for Exceptions to Zoning Rules
10. CUP Requirement for Housing for Disabled Persons
11. Lack of Disabled-Accessible Parking for Multiple-Family Projects
12. Lack of Development Standards for Making Housing Accessible to Disabled Persons
13. Plan Check for Accessibility Compliance of Covered Multi-Family New Construction
14. Zoning Ordinance or Policy for Inclusionary Housing
15. Zoning Ordinance or Policy for Mixed Use Development
16. Development Incentives for the Provision of Affordable Housing
17. Ordinance or Policy Limiting Housing to Fair Housing Protected Classes
18. Zoning Development Standards for Senior Housing/Compliance with Unruh Civil Rights Act
19. CUP Requirements for Senior Housing Developments
20. Zoning and Policies for Special Needs Housing
21. Occupancy Standards More Restrictive than State Law
22. Policy on Admission Preference to Persons Already Residing in the Jurisdiction
23. Impact of Redevelopment Activities on Fair Housing Choice
24. Zoning Ordinance or Policies that Discuss Fair Housing

1. Public Sector Impediments Common to Most Participating Jurisdictions

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.

Jurisdictions planning to define disability in either or both the zoning regulations and a reasonable accommodation procedure need to be aware of what the Fair Housing Act (FHA) and American with Disabilities Act (ADA) cover. The ADA covers the activities of state and local governments, their buildings as well as public accommodations in movie theaters, restaurants, hotels, etc. The FHA applies to residential dwellings. Because of this difference, at one time both builders and developers believed that they were meeting the guidelines of the ADA and, therefore, believed that they were fulfilling all of their responsibilities in regards to accessibility, which was not necessarily true.

Also, the protections for persons with disabilities are very different from protections provided for other protected cases under the FHA in that the provisions actually call for affirmative actions to be taken by housing providers, municipalities and others in removing barriers to fair housing choice for people with disabilities. That is why some cities have adopted an ordinance incorporating provisions to provide people with disabilities reasonable accommodations in rules, policies, practices and procedures that may be necessary to ensure equal access to housing.

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.

Government Code Section 65582(f) states:

“Supportive housing’ has the same meaning as defined in subdivision (b) of Section 50675.14 of the Health and Safety Code.”

Health and Safety Code Section 50675.14(b) states:

“For purposes of this section, ‘supportive housing’ means housing with no limit on length of stay, that is occupied by the target population as defined in subdivision (d) of Section 53260, and that is linked to onsite or offsite services that assist 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.”

Health and Safety Code Section 53260(d) states:

“Target population’ means adults with low incomes having *one or more disabilities*, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people.” [emphasis added]

Government Code Section 65582(g) states:

“Transitional housing’ has the same meaning as defined in subdivision (h) of Section 50675.2 of the Health and Safety Code.”

Health and Safety Code Section 50675.2(h) states:

“Transitional housing’ and ‘transitional housing development’ means buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months.”

Health and Safety Code Section 50801(i) states:

“Transitional housing’ means housing with supportive services for up to 24 months that is exclusively designated and targeted for recently homeless persons. Transitional housing includes self-sufficiency development services, with the ultimate goal of moving recently homeless persons to permanent housing as quickly as possible, and limits rents and service fees to an ability-to-pay formula reasonably consistent with the United States Department of Housing and Urban Development’s requirements for subsidized housing for low-income persons. Rents and service fees paid for transitional housing may be reserved, in whole or in part, to assist residents to move to permanent housing.”

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. The federal Departments of Justice (DOJ) and Housing and Urban Development (HUD) as well as the California Attorney General have encouraged local governments to adopt a reasonable accommodation procedure. The DOJ and HUD have stated:

“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 the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, page 5.

On May 15, 2001 the State Attorney General transmitted a letter to all local governments advising the localities to consider adoption of a reasonable accommodation procedure. In that letter, the Attorney General stated:

“Both the federal Fair Housing Act ('FHA') and the California Fair Employment and Housing Act ('FEHA') impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations and practices when such accommodations 'may be necessary to afford' disabled persons 'an equal opportunity to use and enjoy a dwelling.'”

Many jurisdictions currently handle requests for relief from the zoning ordinance through variance or conditional use permits. The Attorney General remarked that:

“...the criteria for determining whether to grant a variance or conditional use permit typically differ from those which govern the determination whether a requested accommodation is reasonable within the meaning of fair housing laws.

“Thus, municipalities relying upon these alternative procedures have found themselves in the position of having refused to approve a project as a result of considerations which, while sufficient to justify the refusal under the criteria applicable to grant of a variance or conditional use permit, were insufficient to justify the denial when judged in light of the fair housing laws' reasonable accommodations mandate.”

The Attorney General also stated that the variance and conditional use permit procedures – with their different governing criteria – serve to encourage community opposition to projects housing the disabled. The Attorney General wrote:

“Yet this is the very type of opposition that, for example, the typical conditional use permit procedure, with its general health, safety and welfare standard, would seem rather

predictably to invite, whereas a procedure conducted pursuant to the more focused criteria applicable to the reasonable accommodation determination would not."

The advice of the Attorney General is to establish a reasonable accommodation procedure instead of relying on the conditional use permit and variance procedures to process a request for disabled persons seeking specific exceptions to zoning and land-use rules (variances) necessary for them to be able to fully use and enjoy housing. A public hearing is not required for approval of a reasonable accommodation request.

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.

Attachment B on page 6-34 is an example of a reasonable accommodation procedure (City of La Habra).

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. There is a high incidence of disability in the homeless population, domestic violence overwhelmingly impacts women, and people with HIV/AIDS are considered disabled under fair housing law. While age is not a characteristic protected under federal fair housing law, it is covered under state law, and the higher incidence of disability in the frail elderly introduces possible fair housing implications for that population as well.

Entitlement cities and the Urban County should consider enacting special needs housing zoning regulations. Attachment C on page 6-37 is an example of such zoning regulations (City of La Habra).

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. Attachment D on page 6-47 is an example of such zoning regulations (City of San Francisco Fair Housing Implementation Ordinance).

2. City Identified Public Sector Impediments

Based on an evaluation of City Zoning and Planning Codes as well as policies and practices that may pose an impediment to Fair Housing Choice, the City of Newport Beach did not identify any public sector impediments.

Reference: Technical Appendix G: Survey of Zoning and Planning Codes, Policies and Practices that May Pose an Impediment to Fair Housing Choice

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

1. 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.

2. Actions to be Taken by the City

Based on an evaluation of City Zoning and Planning Codes as well as policies and practices that may pose an impediment to Fair Housing Choice, the City of Newport Beach did not identify any public sector impediments.

Therefore, there are no actions to be taken at this time by the City with respect to public sector impediments.

Reference: Technical Appendix G: Survey of Zoning and Planning Codes, Policies and Practices that May Pose an Impediment to Fair Housing Choice

Attachment A
SURVEY OF ZONING AND PLANNING
CODES, POLICIES AND PRACTICES
THAT MAY POSE AN IMPEDIMENT TO FAIR HOUSING CHOICE



201 S. Broadway • Santa Ana, CA 92701
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**SURVEY OF ZONING AND PLANNING
CODES, POLICIES AND PRACTICES**
THAT MAY POSE AN IMPEDIMENT TO FAIR HOUSING CHOICE

Name of Jurisdiction: _____

Completing Department: _____

Completed By: _____

Date Completed: _____

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 24 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 and local developers of housing. 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

[NOTE: For document automation please enable macros and
then double click check boxes to check or uncheck]

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

Background

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 situating of group homes for individuals with disabilities (but not families similarly sized and

situated). Such definitions are prohibited because they could have the effect 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.

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* who were allowed to do so to five. Under the invalidated 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.

For example, a city may have a definition of 'family' as follows:

"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. *[emphasis added]*

A definition of family should look to whether the household functions as a cohesive unit instead of distinguishing between related and unrelated persons.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

2. Does the code definition of "dwelling unit" or "residential unit" have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement? Yes No

Background

The definition of a "dwelling unit" or "residential unit" may exclude or restrict housing opportunities for individuals with disabilities by mischaracterizing congregate or group living arrangements as "boarding or rooming house" a "hotel" or a "residential care facility". Both State and Federal fair housing laws prohibit definitions of dwelling that either *intentionally* discriminate against people with disabilities or *have the effect* of excluding such individuals from housing. Generally, all dwellings are covered by fair housing laws, with a "dwelling" being defined as "a temporary or permanent dwelling place, abode or habitation to which one intends to return as distinguished from the place of temporary sojourn or transient visit."

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

3. Does the code or any policy document define “disability”, if at all; at least as broadly as the federal Fair Housing Act? Yes No

Background

The federal Fair Housing Act (FHA) defines disability/handicap as follows:

"Handicap" means, with respect to a person--

- (1) a physical or mental impairment which substantially limits one or more of such person's major life activities,
- (2) a record of having such an impairment, or
- (3) being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)).

The term "physical or mental impairment" 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.

The California Fair Employment and Housing Act (FEHA) definition is somewhat broader, in that removes the word "substantially". The FEHA definition is:

- (1) A physical or mental impairment that limits one or more of a person's major life activities
- (2) A record of having, or being perceived as having, a physical or mental impairment. It does not include current illegal use of, or addiction to, a controlled substance (as defined by Section 102 of the Federal Controlled Substance Act, 21 U.S.C. Sec. 802).

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

4. Are personal characteristics of residents, including, but not necessarily limited to, disability, considered? Yes No

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 people, 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 conditional use permit or 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 the Department of Justice and the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, pages 2 and 3.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

5. Does the code limit housing opportunities for disabled individuals through restrictions on the provision of on-site supportive services?

Yes No

Background

Housing for disabled persons, to be sustainable, successful and to allow them to fully use and enjoy the housing, 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.”

Joint Statement of the Department of Justice and the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, page 2.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

6. Does the jurisdiction policy have more restrictive limits for occupancies involving disabled residents than for other occupancies of unrelated, non-disabled persons?

Yes No

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.”

Joint Statement of the Department of Justice and the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, page 3.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

7. 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?

Yes No

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 the Department of Justice and the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, pages 4 and 5.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

8. If the jurisdiction supplies or manages housing, is there a clear policy to allow disabled persons residing in or seeking to reside in the housing to make or request reasonable physical modifications or to request reasonable accommodations?

Yes No N/A

If ‘Yes’, is the policy communicated to applicants or residents?

Yes No

Explanation of Answer Given Above

Please provide a brief description of the policy, its dissemination and its process:

9. Does the jurisdiction require a public hearing for disabled persons seeking specific exceptions to zoning and land-use rules (variances) necessary for them to be able fully use and enjoy housing? Yes No

If 'Yes', is the process the same as for other applications for variances, or does it impose added requirements?

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. In acting consistently with "affirmatively furthering fair housing," it is considered preferable to have a reasonable accommodation procedure intended to facilitate a disabled applicant's request for exceptions to zoning and land use rules, that does not require a public hearing process. As previously explained in the joint statement by DOJ and HUD:

"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 the Department of Justice and the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, page 5.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer, and an explanation of any differences for persons with disabilities:

10. Does the zoning code distinguish housing for persons with disabilities from other residential uses by requiring an application for a conditional use permit (CUP)?

Yes No

Background

See the Background section for questions 7 and 9 above.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and what aspects of use trigger the need for a permit:

11. Describe the development standards, if any, for the provision of disabled-accessible parking for multiple-family projects.

12. Does the code contain any development standards or special provisions for making housing accessible to persons with disabilities?

Yes No

Does it specifically reference the accessibility requirements contained in the Fair Housing Amendments Act of 1988?

Yes No

Background

Generally, under the federal Fair Housing Amendments Act of 1988, both privately owned and publicly assisted single-story, multi-family housing units built for first occupancy on or after March 13, 1991— including both 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, or 2) are ground floor units in non-elevator buildings containing four or more units. These standards, encompassing seven basic provisions, are codified at Code of Federal Regulations Title 24, Part 100.205.

Additionally, under Section 504 of the Rehabilitation Act of 1973, it is unlawful to discriminate based on disability in federally assisted programs. This section provides that no otherwise qualified individual shall, solely by reason of his or her disability, be excluded from participation (including employment), denied program benefits, or be subjected to discrimination on account of disability under any program or activity receiving federal funding assistance. Section 504 also contains accessibility provisions for dwellings developed or substantially rehabilitated with federal funds.

For the purposes of compliance with Section 504, “accessible” means ensuring that programs and activities, when viewed in their entirety, are accessible to and usable by individuals with disabilities. For housing purposes, the Section 504 regulations define an accessible dwelling unit as a unit that is located on an accessible route and can be approached, entered, and used by individuals with physical disabilities. A unit that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in Code of Federal Regulations Title 24, Part 8.32 is accessible. In addition, the Section 504 regulations impose specific accessibility requirements for new construction and alteration of housing and non-housing facilities in HUD assisted programs. Section 8.32 of the regulations states that compliance with the appropriate technical criteria in the Uniform Federal Accessibility Standards (UFAS), or a standard that is equivalent to or stricter than the UFAS, is an acceptable means of meeting the technical accessibility requirements in Sections 8.21, 8.22, 8.23 and 8.25 of the Section 504 regulations. However, meeting Section 504 accessibility requirements does not exempt housing from other accessibility requirements that may be required under fair housing laws.

The following Section 504 requirements apply to all federally assisted newly constructed housing and to *substantial rehabilitation* of housing with 15 or more units:

- A minimum of five percent of total dwelling units (but not less than one unit) accessible for individuals with mobility impairments;
- An additional two percent of dwelling units (but not less than one) accessible for persons with hearing or vision impairments; and
- All units made adaptable that are on the ground level or can be reached by an elevator.

Fair housing laws do not impose a duty on local jurisdictions to include accessibility provisions in their codes, or to enforce the accessibility provisions of fair housing laws. However, the inclusions of accessibility standards and/or plan checking for accessibility compliance are significant ways that jurisdictions can affirmatively further fair housing choice for persons with disabilities.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and of the standards, if any:

13. Does the jurisdiction conduct plan checking for accessibility compliance of covered multi-family new construction?

Yes No

Background

See the final paragraph of the Background section of question 12.

If 'Yes', please give a brief description of process and what items are checked.

14. Is there a zoning ordinance or other development policy that encourages or requires the inclusion of housing units affordable to low and/or moderate income households (so-called 'inclusionary housing')?

Yes No

Background

An analysis of impediments to fair housing choice must be careful to not substitute or conflate housing affordability policy with policies intended to affirmatively further fair housing. While household income is not a characteristic addressed by fair housing laws, it is appropriate to recognize that a lack of affordable housing can have a disparate impact on housing choice, on the basis of characteristics protected by fair housing laws.

As demonstrated in the outcome in the recent court case of *U.S. ex rel. Anti-Discrimination Center v. Westchester County*, which involved failures to affirmatively further fair housing by Westchester County, New York, in appropriate circumstances the provision and situation of affordable housing can be a tool to address a lack of fair housing choice in highly segregated communities.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

15. Does the zoning ordinance allow for mixed uses?

Yes No

If 'Yes', does the ordinance or other planning policy document consider the ability of mixed-use development to enhance housing affordability? Also, do development standards for mixed-uses take into consideration the challenges of providing housing accessible to persons with disabilities in such mixed uses?

Background

The purpose of this inquiry relates to housing affordability and fair housing choice as discussed in the Background section of question 14. Also, 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 CFR Title 24, Part 100.205 and CCR Title 24 accessibility requirements.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and a brief overview of the development standards:

16. Does the zoning ordinance provide for any of the following: 1) development incentives for the provision of affordable housing beyond those provided by state law; 2) development by right of affordable housing; or, 3) a zoning overlay to allow for affordable housing development?

Yes No

Background

The purpose of this inquiry relates to housing affordability and fair housing choice as discussed in the Background section of the question 14.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and a brief overview of the development standards:

17. Does the zoning ordinance describe any areas in this jurisdiction as exclusive?

Yes No

Are there exclusions or discussions in the ordinance or any planning policy document of limiting housing on the basis of any of the following characteristics covered by fair housing laws?

Yes No

If 'Yes', check all of the following that apply:

Race Color Sex Religion Age Disability
Familial Status National Origin

Explanation of Answer Given Above

Please provide a brief explanation of the how you arrived at the answer:

18. Are there any standards for Senior Housing in the zoning ordinance?

Yes No

If 'Yes', do the standards comply with state or federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older, or occupied by at least one person 55 years of age, or other qualified permanent resident pursuant to Civil Code §51.3)?

Yes No

Is the location of Senior Housing treated differently than that other rental or for-sale housing?

Yes No

If 'Yes', explain.

Background

Under federal law housing discrimination against families with children is permitted only in housing in which all the residents are 62 years of age or older or where at least 80% of the occupied units have one person who is 55 years of age or older. Generally, California law states that a housing provider using the lower age limitation of 55 years must have at least 35 units to use the familial status discrimination exemption. Also, California law, with narrow exceptions, requires all residents to be "senior citizens" or "qualified permanent residents", pursuant to Civil Code §51.3.

The 1988 amendments to the federal Fair Housing Act exempt "housing for older persons" from the prohibitions against familial discrimination. This means that housing communities and facilities that meet the criteria for the federal Housing for Older Persons Act (HOPA) may legally exclude families with children. Such housing is still bound by all other aspects of fair housing law (such as prohibition of discrimination based on race, national origin or disability).

Section 3607(b)(2) defines "housing for older persons" as housing:

- (A) provided under any State or Federal program that the Secretary determines is specifically designed and operated to assist elderly persons (as defined in the State or Federal program); or
- (B) intended for, and solely occupied by, persons 62 years of age or older; or
- (C) intended and operated for occupancy by persons 55 years of age or older and –
 - (i) at least 80 percent of the occupied units are occupied by at least one person who is 55 years of age or older;
 - (ii) the housing facility or community publishes and adheres to policies and procedures that demonstrate the intent required under this subparagraph; and
 - (iii) the housing facility or community complies with rules issued by the Secretary for verification of occupancy, which shall –

- (I) provide for verification by reliable surveys and affidavits, and
- (II) include examples of the types of policies and procedures relevant to a determination of compliance with the requirement of clause (ii). Such surveys and affidavits shall be admissible in administrative and judicial proceedings for the purposes of such verification.

Subsection (C) was changed by the Housing for Older Persons Act of 1995 (HOPA) to remove some of the uncertainties created by a provision in the 1988 Amendments that required the "existence of significant facilities and services specifically designed to meet the physical and social needs of older persons." The HOPA also provides for a good faith defense in an action for monetary damages under this subsection.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and a brief overview of the development standards, if any:

19. Does the zoning code distinguish senior citizen housing from other residential uses by the application of a conditional use permit (CUP)?

Yes No

Background

Senior housing is an important component of the community's housing stock. Demographic projections show that many communities will experience a growth in the elderly population. As a population ages, seniors need a variety of housing opportunities. Also, there is a higher prevalence of persons with disabilities within the senior population.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and what aspects of use trigger the need for a permit:

20. Does the zoning code or other planning policy document address housing for "special needs" populations?

Yes No

Background

Special needs populations typically are considered to be homeless people, victims of domestic violence, people with disabilities (including those recovering from substance abuse), youth in crisis, people living with HIV/AIDS and the frail elderly. Of these groups, homeless people, victims of domestic violence, people with disabilities, and people living with HIV/AIDS have direct fair housing implications. There is a high incidence of disability in the homeless population, domestic violence overwhelming impacts women; and people living with HIV/AIDS are considered disabled under fair housing laws. While age is not a characteristic protected under federal fair housing law, it is covered under state law, and the higher incidence of disability in the frail elderly introduces possible fair housing implication for that population as well.

These populations often rely on group homes or service-enriched multi-family settings for housing opportunities. To the extent that zoning and other planning policy documents fail to provide for, or impose barriers to, these types of housing an impediment to fair housing choice might exist.

As previously noted, according to the DOJ and HUD, the term 'group home' does not have a specific legal meaning. While it often implies a living situation for people with disabilities, it also applies to any group of unrelated persons, often sharing common characteristics, who live together in a dwelling. This broader use of the term encompasses 'special needs' individuals.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and a brief explanation of 'special needs' provisions, if any:

21. Does the zoning ordinance establish occupancy standards or maximum occupancy limits that are more restrictive than state law, which incorporates the Uniform Housing Code (UHC)?

Yes No

Background

Occupancy standards sometimes can impede housing choice for families with children or for disabled persons. For example, some jurisdiction's zoning regulations have attempted to limit occupancy to five related persons occupying a single family home, or to strictly establish an occupancy standard of no more than two persons per bedroom. Such regulations can limit housing availability for some families with children, or prevent the development of housing for disabled persons.

The federal Fair Housing Act (FHA) also 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." [Section 807(b)(1)]

HUD implements section 589 of the Quality Housing and Work Responsibility Act (QHWRA) of 1988 by adopting as its policy on occupancy standards for purposes of enforcement actions under the FHA, the standards provided in the Memorandum of General Counsel Frank Keating to Regional Counsel dated March 20, 1991. The purpose of that Memorandum was "to articulate more fully the Department's position on reasonable occupancy policies and to describe the approach that the Department takes on its review of occupancy cases." The Memorandum states the following:

"Specifically, the Department believes that an occupancy policy of two persons in a bedroom, as a general rule, is reasonable under the Fair Housing Act. [. . .] However, the reasonableness of any occupancy policy is rebuttable, and **neither the February 21 [1991] memorandum nor this memorandum implies that Department will determine compliance with the Fair Housing Act based solely on the number of people permitted in each bedroom.**" [emphasis added]

The memorandum goes on to reiterate statements taken from the final rule implementing the Fair Housing Amendments Act of 1988 as follows:

- “[T]here is nothing in the legislative history that indicates any intent on the part of Congress to provide for the development of a national occupancy code”
- “Thus, the Department 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 that, in connection with a complaint alleging discrimination on the basis of familial status, the Department will carefully examine any such nongovernmental restriction to determine whether it operates unreasonably to limit or exclude families with children.”*

*U.S. Department of Housing and Urban Development, Memorandum to All Regional Counsel from Frank Keating on the subject of *Fair Housing Enforcement Policy: Occupancy Cases*, March 20, 1991.

Essentially, HUD has established a starting point for assessing the reasonableness of occupancy restrictions, but has stated that the specific facts of each living situation must inform the final determination of reasonableness. While the above discussion relates to matters of discrimination affecting families with children, a similar analysis applies to standards that may limit housing choice for persons with disabilities.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and the standards, if any:

For more information, contact the Office of the Vice President for Research and Economic Development at 505-274-3000 or research@unm.edu.

22. Does the jurisdiction encourage or require affordable housing developments to give an admission preference to individuals already residing within the jurisdiction?

If 'Yes', is it a requirement?

Yes No
Yes No

Background

This practice may have fair housing implications if the population of the jurisdiction lacks diversity or does not reflect the demographic makeup of the larger region in which it is located. There may be a barrier to fair housing choice, in that the policy can have a discriminatory affect on the basis of characteristics considered by fair housing laws.

For example if a jurisdiction already lacks housing suitable to people with mobility-related disabilities, the local population may have an under representation of such individuals, when compared to the population generally. Newly developed accessible housing that could meet the needs of such individuals, but which has a local resident admission preference, would be less likely to improve the ability of people with mobility-related disabilities to live in the jurisdiction. Likewise, a jurisdiction with an under representation of minority residents is likely to perpetuate that situation if a local resident admission preference is implemented for new affordable housing development.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

23. Does the jurisdiction have any redevelopment areas?

Yes No

If 'Yes', does the jurisdiction analyze possible impacts on fair housing choice resulting from its redevelopment activities?

Yes No

Background

Redevelopment activities can result in the permanent displacement of residents. If the housing opportunities created by the redevelopment activity could result in a different demographic mix of residents, consideration needs to be given as to whether this difference represents an impediment, an enhancement or is neutral with respect to fair housing choice.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

24. Does the zoning ordinance or other planning or policy document include a discussion of fair housing?

Yes No

If 'Yes', how does the jurisdiction propose to further fair housing?

Background

Affirmatively furthering fair housing is an important responsibility of local government. In order to receive certain federal funds a jurisdiction must certify that it is taking actions to "affirmatively further fair housing" (AFFH). Although a jurisdiction may have numerous plans, policies, and standards, fair housing is rarely discussed in a zoning ordinance. Other documents of a jurisdiction may discuss the need to affirmatively further fair housing and the policies and actions that are in place to do so.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer, a description of where AFFH discussions, if any, may be found, and a brief summary of how AFFH is accomplished:

IDENTIFIED IMPEDIMENTS AND PROPOSED CORRECTIVE ACTIONS

Based on your responses to questions 1-24, please:

a) provide a concise list of the zoning and planning impediments to fair housing choice that you have identified

b) describe the actions that will be taken over the next five years to remove or ameliorate the identified impediments.

ACKNOWLEDGMENTS:

Thanks go to David A. Acevedo and Jesus Velo, of the HUD Los Angeles Fair Housing and Equal Opportunity Office, and Ralph Castañeda, Jr., of Castañeda & Associates, for providing substantial content that went into the preparation of this survey.

PLEASE RETURN COMPLETED SURVEY VIA E-MAIL TO DAVID LEVY AT:

dlevy@fairhousingoc.org

**Attachment B
City of La Habra
Chapter 18.09**

Reasonable Accommodations in Housing to Disabled Individuals

18.09.010 Purpose.

It is the purpose of this chapter, pursuant to Fair Housing Laws, to provide individuals with disabilities reasonable accommodation in the application of the city's rules, policies, practices and procedures, as necessary to ensure equal access to housing. The purpose of this chapter is to provide a process for individuals with disabilities to make requests for, and be provided, reasonable accommodation from the various land use, zoning, or building laws, rules, policies, practices and/or procedures of the city, where warranted. (Ord. 1684 § 22 (part), 2007)

18.09.020 Definitions.

A. Applicant. A person, business, or organization making a written request to city for reasonable accommodation in the strict application of land use or zoning provisions of this title.

B. City. The city of La Habra.

C. Code. The La Habra Municipal Code.

D. Department. The community development department of city.

E. Director. The community development director of city.

F. Disabled or Handicapped Person. An individual who has a physical or mental impairment that substantially limits one or more of that person's major life activities; anyone who is regarded as having such impairment; or anyone who has a record of having such an impairment, but not including an individual's current, illegal use of a controlled substance.

G. Fair Housing Laws. The "Fair Housing Amendments Act of 1988" (42 U.S.C. § 3601, et seq.), including reasonable accommodation required by 42 U.S.C. § 3604(f)(3)(B), and the "California Fair Employment and Housing Act" (California Government Code Section 12900, et seq.), including reasonable accommodation required specifically by California Government Code Sections 12927(c)(1) and 12955(1), as any of these statutory provisions now exist or may be amended from time to time. (Ord. 1684 § 22 (part), 2007)

18.09.030 Notice to the public of availability of accommodation process.

The department shall prominently display in the public areas of the planning and building and safety department at city hall a notice advising those with disabilities or their representatives that they may request a reasonable accommodation in accordance with the procedures established in this chapter. City employees shall direct individuals to the display whenever they are requested to do so or reasonably believe that individuals with disabilities or their representatives may be entitled to a reasonable accommodation. (Ord. 1684 § 22 (part), 2007)

18.09.040 Requesting reasonable accommodation.

A. In order to make specific housing available to an individual with a disability, a disabled person or representative may request reasonable accommodation, pursuant to this chapter, relating to the application of various land use, zoning, or building laws, rules, policies, practices and/or procedures of the city.

B. If an individual or representative needs assistance in making a request for reasonable accommodation, or appealing a determination regarding reasonable accommodation,

the department will endeavor to provide the assistance necessary to ensure that the process is accessible to the applicant or representative. The applicant may be represented at all stages of the proceeding by a person designated by the applicant as his or her representative.

C. A request for reasonable accommodation in laws, rules, policies, practices and/or procedures must be filed on an application form provided by the department and shall include the following information:

1. A description of how the property will be used by the disabled individual(s);
2. The basis for the claim that the Fair Housing Laws apply to the individual(s) and evidence supporting the claim, which may be in the form of a letter from a medical doctor or other licensed healthcare professional, a handicapped license, or other appropriate evidence; and
3. The specific reason the requested accommodation is necessary to make particular housing available to the disabled individual(s).

D. A filing fee in an amount as determined from time to time by resolution of the city council, but not to exceed the reasonable estimated costs to the city in processing the application. (Ord. 1684 § 22 (part), 2007)

18.09.050 Decision on application.

A. The director shall have the authority to consider and act on requests for reasonable accommodation. The director shall issue a written determination within thirty days of the date of receipt of a completed application and may (1) grant the accommodation request, (2) grant the accommodation request subject to specified nondiscriminatory conditions, (3) deny the request, or (4) may refer the matter to the planning commission, which shall render a decision on the application in the same manner as it considers an appeal. All written determinations shall give notice of the right to appeal and the right to request reasonable accommodation on the appeals process, if necessary. The notice of determination shall be sent to the applicant by first class mail.

B. If necessary to reach a determination on the request for reasonable accommodation, the director may request further information from the applicant consistent with this chapter, specifying in detail what information is required. In the event a request for further information is made, the thirty-day period to issue a written determination shall be stayed until the applicant reasonably responds to the request. (Ord. 1684 § 22 (part), 2007)

18.09.060 Required findings.

The following findings must be made in order to approve a request for reasonable accommodation:

A. The housing, which is the subject of the request for reasonable accommodation, will be used by an individual protected under the Fair Housing Laws.

B. The request for reasonable accommodation is necessary to make specific housing available to one or more individuals protected under the Fair Housing Laws.

C. The requested reasonable accommodation will not impose an undue financial or administrative burden on the city.

D. The requested accommodation will not require a fundamental alteration of the zoning or building laws, policies and/or procedures of the city.

If, based upon all of the evidence presented to the director, the above findings may reasonably be made, the director shall grant the requested reasonable accommodation. (Ord. 1684 § 22 (part), 2007)

18.09.070 Appeals.

A. Within thirty days of the date the director issues a written determination, any person aggrieved or affected by a decision on an application requesting the accommodation may appeal such determination in writing to the planning commission or to the city council, as applicable.

B. All appeals shall contain a statement of the grounds for the appeal.

C. No such appeal shall be accepted unless there is, paid contemporaneously with the filing of such letter, a filing and processing fee in a sum to be set by resolution of the city council. Upon receipt of a timely filed appeal, together with the filing and processing fee, the secretary of the planning commission or the city clerk shall set the matter for a de novo hearing before the planning commission or city council, as applicable, at its next most convenient meeting.

D. Appeals shall be to the planning commission, or the city council as applicable, which shall hear the matter and render a determination as soon as reasonably practicable, but in no event later than sixty days after an appeal has been filed, or after an application has been referred to it by the director. All determinations shall address and be based upon the same findings required to be made in the original determination from which the appeal is taken.

E. An applicant may request reasonable accommodation in the procedure by which an appeal will be conducted.

F. Any determination by the planning commission or city council on an application or appeal shall be by a de novo hearing.

G. An applicant requesting the accommodation may appeal an adverse determination or any conditions or limitations imposed by the director to the planning commission and the planning commission's decision to the city council, in accordance with this section. In the case of an appeal of the director's decision to the planning commission or the planning commission's decision to the city council, the planning commission and city council decisions shall be final. (Ord. 1684 § 22 (part), 2007)

18.09.080 Waiver of time periods.

Notwithstanding any provisions in this chapter regarding the occurrence of any action within a specified period of time, the applicant may request additional time beyond that provided for in this chapter or may request a continuance regarding any decision or consideration by the city of the pending appeal. Extensions of time sought by applicants shall not be considered delay on the part of the city, shall not constitute failure by the city to provide for prompt decisions on applications and shall not be a violation of any required time period set forth in this chapter. (Ord. 1684 § 22 (part), 2007)

**Attachment C
City of La Habra
Chapter 18.21
Special Needs Housing**

18.21.010 Purpose.

The purpose of this chapter is to establish uniform standards, land use regulations and permit processes for the development of congregate housing, domestic violence shelters, homeless shelters, senior hotel, single-room occupancy housing (SROs), and transitional housing; and to implement general plan policies regarding special needs households. (Ord. 1460 § 1 (part), 1993)

18.21.020 Definitions.

“Congregate housing” means a residential facility with shared common living areas, restricted by an agreement approved by the city for occupancy by low and very low income households, providing services which may include meals, housekeeping, child care, and other services as well as common areas for residents of the facility.

“Domestic violence shelter” means a residential facility which provides temporary accommodations to persons and/or families who have been the victims of domestic violence. Such a facility may provide meals, child care, counseling, and other services. The term “temporary accommodations” means that a person or family will be allowed to reside at the shelter for a time period not to exceed six months.

“Homeless shelter” means a residential facility which provides temporary accommodations to homeless persons and/or families and which meet standards for shelters contained in Title 25 California Administrative Code, Part 1, Chapter F, Subchapter 12, Section 7972. The facility may provide, or contract with recognized community organizations to provide, emergency or temporary shelter, and may also provide meals, child care, counseling, and other services. Such facility may have individual rooms, but is not developed with individual dwelling units, with the exception of manager units. The term “temporary accommodations” means that a person or family will be allowed to reside at the shelter for a time period not to exceed six months.

“Low income family” means any household whose income exceeds fifty percent but does not exceed eighty percent of median income adjusted for household size as defined by the U.S. Department of Housing and Urban Development for the Anaheim-Santa Ana Primary Metropolitan Statistical Area.

“Senior hotel” means a cluster of guest units with shared common living areas, restricted for occupancy by persons who are sixty-two years of age or older, providing services which may provide meals, housekeeping and other services.

“Single-room occupancy housing” means a cluster of guest units within a residential hotel providing sleeping and living facilities restricted by an agreement approved by the city for occupancy by low and very low income individuals, designed for occupancy for periods of one month or longer.

“Transitional housing” means a residential facility that provides accommodations to low and very low income persons and families for periods of up to two years, and which also may provide meals, child care, counseling, and other services, as well as common areas for residents of the facility. The intent of this type of facility is to provide a stable environment for the homeless and to facilitate self-sufficiency. This type of facility typically involves a situation wherein the resident is accountable to the owner/operator for his location and conduct among other factors.

“Very low income” means any household whose income does not exceed fifty percent of median income adjusted for household size as defined by the U.S. Department of Housing and Urban Development for the Anaheim-Santa Ana Primary Metropolitan Statistical Area. (Ord. 1684 § 13, 2007; Ord. 1460 § 1 (part), 1993)

18.21.030 Applicability.

- A. The specific requirements of this chapter are applicable to the development of congregate housing, domestic violence shelters, homeless shelters, senior hotels, single-room occupancy housing (SROs), and transitional housing as defined in Section 18.21.020.
- B. Congregate housing, domestic violence shelters, homeless shelters, senior hotels, single-room occupancy (SROs), and transitional housing projects are permitted within commercial, industrial, and high density land use designated areas within multiple family zone with an approved conditional use permit pursuant to the procedures established in Chapter 18.58. (Ord. 1460 § 1 (part), 1993)

18.21.040 General provisions.

- A. All facilities shall maintain a scale, character, and design consistent with the area and compatible with the surrounding developments.
- B. All congregate housing, domestic violence shelter, homeless shelter, senior hotel, single room occupancy (SROs) and transitional housing projects within permitted commercial, industrial, and residential zones shall be subject to the special development standards established in Section 18.18.070.
- C. Site Access. A single controlled entryway for routine ingress to the site shall be situated adjacent to and in full view of the manager's office.
- D. Laundry Facilities. Washer and dryer shall be provided in a separate room in a location accessible to all the residents of the facility. Washers and dryers may be coin-operated.
- E. Child Care Area. All facilities providing child care on-site shall provide yard area in compliance with all state regulations. The yard area required for child care shall be provided in addition to the required usable yard area for the facility.
- F. Pay Telephone. A minimum of two pay telephones shall be provided in the facility.
- G. On-site Manager. Each congregate housing, domestic violence shelter, homeless shelter, single room occupancy (SROs), senior citizen hotel and transitional housing project shall have a twenty-four hour on-site manager.

H. Management Plan. A management plan shall be submitted for review and approval with the conditional use permit application. The management plan shall contain the following information, as applicable:

1. Child care;
2. Emergency procedures;
3. Maintenance plans;
4. Management policies;
5. Operation of the facility;
6. Rental procedures and policies;
7. Residency rules;
8. Screening of residents to insure compatibility with services provided at the facility;
9. Security programs;
10. Services, training, counseling, and treatment programs for residents to be provided by the facility, including services to assist resident to obtain permanent income and shelter;
11. Staffing needs;
12. Staff training;
13. Tenants responsibility.

I. Project Review.

1. Annual Review. Each project shall be subject to annual review by the city which includes the review of management services. The project owner shall be responsible for filing an annual report to the city which includes the range of monthly rents, average length of tenancy, range of monthly income of residents, occupancy rates, number of family served, the number of vehicles owned by the residents, and services provided at the facility;

2. Management Plan Revisions. Management plan revisions shall be reviewed and approved by the chief planner, before implementation of changes. Substantive changes or revisions as determined by the chief planner shall be approved by the planning commission. (Ord. 1460 § 1 (part), 1993)

18.21.050 Congregate housing, domestic violence shelter and transitional housing.

Congregate housing, domestic violence shelter and transitional housing shall conform to all standards of development of the zoning in which it is located except as provided in this section.

A. Density.

1. In high density residential land use designated areas within multiple family residential zones, the number of families shall not exceed the number of families permitted pursuant to the appropriate zoning designation provided for in Table 18.18.060.1-C, plus twenty-five percent.

2. In all commercial and industrial zones, the number of families shall not exceed that pursuant to the zoning designation provided in Table 18.21.050A, plus twenty-five percent. The maximum floor area ratio (FAR), shall not exceed that established within the appropriate land use designation of the general plan land use element.

Table 18.21.050A

Total Area Of Parcel Being Developed	Minimum Area Per Family Within: CP; C-1; C-2; C-3; PC-I; M-1
Under 10,000 square feet	1,980
10,001 through 20,000 square feet	1,742
20,001 square feet and over	1,555

B. Building Design.

1. Each facility within the high density residential, commercial, and industrial land use designated areas shall contain common kitchen, dining and living room areas adequate for the number of residents serviced.

- a. Bathrooms shall contain lavatory, toilet, and shower or bathtub adequate for the number of residents serviced,
- b. Each bedroom shall have access to a bathroom,
- c. Each bedroom shall have a minimum of eighteen square feet of closet/storage space,
- d. Bedroom occupancy shall be determined in accordance with the Uniform Building Code or as limited by the planning commission;

2. Each facility shall provide private sleeping areas per families serviced in accordance with the requirements of the building code.

C. Recreational and Usable Yard Area.

1. Minimum Area Per Parcel. Such usable yard area shall have no dimension of less than fifteen feet. This area may be provided at any location on the lot except in the required front yard or in a required side yard abutting a street. This area may be divided into not more than two separate subareas.

- a. Within the multiple family zone, no parcel of land shall have less than one thousand square feet of usable yard area plus one hundred square feet per bedroom,
- b. Within commercial and industrial zones, no parcel of land shall have less than eight hundred square feet of usable yard area plus eighty square feet per bedroom.

D. Parking.

1. Automobiles. For each facility located within an allowed designation, a minimum of two parking spaces shall be provided per the standards established in Chapter 18.56. (Ord. 1693 § 2(b), 2008; Ord. 1460 § 1 (part), 1993)

18.21.060 Homeless shelter.

Homeless shelters shall conform to all standards of development of the zoning in which it is located except as provided in this section.

A. Density.

1. In high density residential land use designated areas within a multiple family zone, the number of beds shall be limited to three times the maximum units permitted within the zoning designation in which the facility is located as established in Table 18.18.060.1-C;
2. In all commercial and industrial zones, the number of beds shall be limited to three times the maximum number of units allowed within the commercial/industrial zone as provided in Table 18.21.050A. The proposed development shall not exceed the maximum floor area ratio (FAR) established within the general plan land use element for the appropriate land use designation.

B. Building Design.

1. Each facility shall provide common kitchen and dining room area adequate for the number of residents serviced;
2. Each facility shall provide bathroom with lavatory, toilet, and showers adequate for the number of residents serviced.

C. Recreational and Usable Yard Area.

1. Minimum Area Per Parcel. Such usable yard area shall have no dimension of less than fifteen feet. This area may be provided at any location on the lot except in the required front yard or in a required side yard abutting a street. Subareas may be divided into not more than two separate subareas.
 - a. Within multiple family zones, no parcel of land shall have less than one thousand square feet of usable yard area plus sixty-two square feet per bed,
 - b. Within the commercial and industrial zones, no parcel of land shall have less than five hundred square feet of usable yard area plus ten square feet of additional usable yard area per each additional bed over twenty-five.

D. Parking. (See Chapter 18.56.)

E. Operating and Location Requirements.

1. No more than one federal, state or youth authority parolee shall be allowed to live in a homeless shelter at any one time.
2. The conditional use application submitted for any homeless shelter shall provide information, including identifying information such as the full name and age of the parolee and the proposed time of residency at the facility, regarding any proposed residents who will be, at the time of proposed residency in the homeless shelter, federal, state or youth authority parolees. Such information shall be updated with the city by the owner or landlord of the facility as to each lessee, renter, resident or occupant upon the signing, entering into, or otherwise commencing any rental or lease agreement, arrangement or accommodation within three business days.
3. All homeless shelters shall require residents or occupants to sign an agreement that provides that a conviction for any criminal violation, not including infractions and minor traffic

violations, during residency or occupancy in the transitional shelter/house, is grounds for termination of the residency, tenancy, occupancy or accommodations of that resident or occupant, whether the rental, lease, or sublease agreement is written or oral.

4. Homeless shelters shall be in compliance with all requirements of the city's zoning code at all times, as well as any other applicable provisions of this code, including obtaining any other permits or licenses, such as building permits or a business license, required before establishing, expanding or maintaining the use.

5. No homeless shelter shall be maintained as a nuisance. The conduct of any homeless shelter within the city in violation of any of the terms of this chapter or other applicable provisions of this code found and declared to be a public nuisance, and the city attorney or the district attorney may, in addition or in lieu of prosecuting a criminal action hereunder, commence an action or proceeding for the abatement, removal and injunction thereof, in the manner provided by law; and shall take other steps and shall apply to such courts as may have jurisdiction to grant such relief as will abate or remove such homeless shelter and restrain and enjoin any person from conducting, operating or maintaining a homeless shelter contrary to the provisions of this chapter or code.

6. Any violation of any local, state or federal laws by residents or occupants of homeless shelters while on the premises shall be grounds for revocation of the homeless shelter's conditional use permit, including but not limited to any violations of this section, California Penal Code Section 3003.5 or Chapter 9.66 of this code, where the property owner contributed to or did not take all reasonable steps to protect against or prevent the violation.

7. Any owner, operator, manager, employee or independent contractor of a homeless shelter violating or permitting, counseling, or assisting the violation of any of the provisions of this chapter or applicable provisions of this code regulating homeless shelters shall be subject to any and all civil remedies, including conditional permit revocation, criminal penalties pursuant to Chapter 1.08 of this code, and/or administrative citations pursuant to Chapter 1.09. All remedies provided herein shall be cumulative and not exclusive. Any violation of these provisions shall constitute a separate violation for each and every day during which such violation is committed or continued. (Ord. 1693 § 2(c), 2008; Ord. 1684 § 14, 2007; Ord. 1460 § 1 (part), 1993)

18.21.070 Senior hotel.

Senior hotels shall conform with all local state and federal requirements for senior housing. Each facility shall conform to all property development standards of the zoning in which it is located except as provided in this section.

A. Density.

1. In high density residential land use designated areas within multiple family residential zoned areas, the number of units shall not exceed that pursuant to the zoning designation provided in Table 18.18.060.1-C, plus twenty-five percent;

2. In all commercial and industrial zones, the number of units shall be limited by the maximum floor area ratio (FAR) as established within the general plan land use element for the appropriate land use designation.

- B. Building Design. Each guest unit shall contain a bathroom.
 - 1. Bathrooms shall contain a lavatory, toilet, and shower or bathtub;
 - 2. Each unit shall have a minimum forty-eight cubic feet of closet/storage space.
- C. Recreational and Usable Yard Area.
 - 1. Minimum Area Per Parcel. Such usable yard area shall have no dimension of less than fifteen feet. This area may be provided at any location on the lot except in the required front yard or in a required side yard abutting a street.
 - a. Within multiple family zones, no parcel of land shall have less than one thousand square feet of usable yard area plus one hundred square feet per bedroom.
 - b. Within the commercial and industrial zones, no parcel of land shall have less than one thousand square feet of common usable yard area plus fifteen square feet of common recreational area per guest unit for projects over twenty-five units.
 - 2. Common recreational space may be indoor or outdoor provided there is at least forty percent allotted towards outdoor space; the balance may be indoors or outdoors.
- D. Parking. (See Chapter 18.56.)
- E. Common Facilities. The development may provide one or more of the following common facilities for the exclusive use of the senior citizen residents:
 - 1. Central cooking and dining room;
 - 2. Recreation room;
 - 3. Library;
 - 4. Beauty salon and barber shop;
 - 5. Small pharmacy;
 - 6. Laundry facilities or laundry services.
- F. Occupancy.
 - 1. No more than one person shall be permitted to reside in any unit which is less than two hundred twenty square feet in size. No more than two persons shall be permitted to reside in any unit.
 - 2. Residential occupancy shall be limited to single persons sixty-two years of age or older, or to couples in which one person is sixty-two years of age or older. (Ord. 1693 § 2(d), 2008; Ord. 1460 § 1 (part), 1993)

18.21.080 Single-room occupancy housing (SROs).

SRO projects shall conform to all standards of development of the zoning in which it is located except as provided below.

A. Density.

1. In high density residential land use designated areas with multiple family residential zones, the number of units shall not exceed that pursuant to the zoning designation provided in Table 18.18.060.1-C, plus twenty-five percent;
2. In all commercial and industrial zones, the number of units shall be limited by the maximum floor area ratio (FAR), as established within the appropriate land use designation of the general plan land use element.

B. Building Design.

1. Unit Size. Minimum unit size for all SROs shall be one hundred seventy square feet and maximum unit size for all SROs shall be four hundred square feet;
2. Each unit shall contain a kitchen and bathroom.
 - a. Kitchens shall contain a sink with garbage disposal, counter top minimum sixteen by twenty-four inch, refrigerator, and stove or microwave oven,
 - b. If stoves are not provided in each unit, then stoves shall be provided in a common
 - c. Bathrooms shall contain a lavatory, toilet, and shower or bathtub,
 - d. Each unit shall have a minimum forty-eight cubic feet of closet/storage space.

C. Recreational and Usable Yard Area.

1. Minimum Area Per Parcel.
 - a. Within multiple-family zones, no parcel of land shall have less than one thousand square feet of usable yard area plus one hundred square feet per unit,
 - b. Within the commercial and industrial zones, no parcel of land shall have less than five hundred square feet of common usable yard area plus fifteen square feet of common recreational area per unit for projects over twenty-five units. Such usable yard area shall have no dimension of less than fifteen feet. This area may be provided at any location on the lot except in the required front yard or in a required side yard abutting a street;

2. Common recreational space may be indoor or outdoor provided there is at least forty percent allotted towards outdoor space; the balance may be indoors or outdoors.

D. Parking. (See Chapter 18.56.)

E. Occupancy. No more than one person shall be permitted to reside in any unit which is less than two hundred twenty square feet in size. No more than two persons shall be permitted to reside in any unit. (Ord. 1693 § 2(e), 2008; Ord. 1460 § 1 (part), 1993)

18.21.090 Transitional housing project.

Transitional housing projects shall also comply with the following operating and location requirements:

- A. No more than one federal, state or youth authority parolee shall be allowed to live in a transitional housing project at any one time.
- B. No transitional housing project shall be within five hundred feet of any other transitional housing project. The distance requirement herein shall be measured from property line to property line, along a straight line extended between the two points.
- C. The conditional use application submitted for any transitional housing project shall provide information, including identifying information such as the full name and age of the parolee and the proposed time of residency at the facility, regarding any proposed residents who will be, at the time of proposed residency in the transitional housing project, federal, state or youth authority parolees. Such information shall be updated with the city by the owner or landlord of the facility as to each lessee, renter, resident or occupant upon the signing, entering into, or otherwise commencing any rental or lease agreement, arrangement or accommodation within three business days.
- D. All transitional housing projects shall require residents or occupants to sign an agreement that provides that a conviction for any criminal violation, not including infractions and minor traffic violations, during residency or occupancy at the transitional housing project, is grounds for termination of the residency, tenancy, occupancy or accommodations of that resident or occupant, whether the rental, lease, or sublease agreement is written or oral.
- E. Transitional housing projects shall be in compliance with all requirements of the city's zoning code at all times.
- F. No transitional housing project shall be maintained as a nuisance. The conduct of any transitional housing project within the city in violation of any of the terms of this chapter or other applicable provisions of this code found and declared to be a public nuisance, and the city attorney or the district attorney may, in addition or in lieu of prosecuting a criminal action hereunder, commence an action or proceeding for the abatement, removal and injunction thereof, in the manner provided by law; and shall take other steps and shall apply to such courts as may have jurisdiction to grant such relief as will abate or remove such transitional housing project and restrain and enjoin any person from conducting, operating or maintaining a transitional housing project contrary to the provisions of this chapter or code.
- G. Any violation of any local, state or federal laws by residents or occupants of transitional housing projects while on the premises shall be grounds for revocation of the transitional housing project's conditional use permit, including but not limited to any violations of this section, California Penal Code Section 3003.5 or Chapter 9.66 of this code, where the property owner contributed to or did not take all reasonable steps to protect against or prevent the violation.
- H. Any owner, operator, manager, employee or independent contractor of a transitional housing project violating or permitting, counseling, or assisting the violation of any of the provisions of this chapter or applicable provisions of this code regulating transitional housing projects shall be subject to any and all civil remedies, including conditional permit revocation,

criminal penalties pursuant to Chapter 1.08 of this code, and/or administrative citations pursuant to Chapter 1.09. All remedies provided herein shall be cumulative and not exclusive. Any violation of these provisions shall constitute a separate violation for each and every day during which such violation is committed or continued. (Ord. 1684 § 15, 2007)

Attachment D
City of San Francisco
Chapter 87
Fair Housing Implementation Ordinance

SEC. 87.1. - SHORT TITLE.

This ordinance shall be entitled the "Fair Housing Implementation Ordinance."
(Added by Ord. 303-99, File No. 990494, App. 12/3/99)

SEC. 87.2. - FINDINGS.

The Board of Supervisors finds that:

(a) Federal, state and local fair housing laws protect certain classes of individuals from housing discrimination that may occur through zoning laws, land use authorizations, funding decisions and other activities of local government. These laws include, but are not limited to:

(1) The federal Fair Housing Act, 42 U.S.C. §§ 3601 et seq. This law prohibits, among other things, local government from making dwellings unavailable because of the race, color, religion, sex, familial status, national origin, or handicap of the individual(s) seeking such dwellings.

(2) California Government Code Section 12955 (the "California Fair Employment and Housing Act"). This law prohibits local government from (i) making housing unavailable, and (ii) discriminating through land use practices, decisions, and authorizations, because of race, color, religion, sex, familial status, marital status, disability, national origin, or ancestry. Prohibited practices include, but are not limited to, zoning laws, denials of use permits, and other actions under the Planning and Zoning Law, Government Code § 65000 et seq., that make housing opportunities unavailable because of protected class status.

(3) California Government Code Section 12955.8(a) (the "California Fair Employment and Housing Act"). This law establishes that a local government engages in unlawful housing discrimination if race, color, religion, sex, familial status, marital status, disability, national origin, or ancestry is a motivating factor when a land use practice, decision, authorization, or other local action makes housing unavailable to members of a protected class.

(4) California Government Code Section 12955.8(b) (the "California Fair Employment and Housing Act"). This law establishes that a local government engages in unlawful housing discrimination if a land use practice, decision, authorization, or other local action has an unjustified discriminatory effect, regardless of intent, on the basis of race, color, religion, sex, familial status, marital status, disability, national origin, or ancestry.

(5) California Government Code Section 65008 (the "California Planning and Zoning Law"). This law prohibits, among other things, local government, in the enactment or administration of zoning laws, from discriminating against a residential development because the development is intended for occupancy by low and moderate income persons. This Act also prohibits local government from imposing different requirements on residential developments because of race, sex, color, religion, ethnicity, national origin, ancestry, lawful occupation or age of the intended occupants of the development, or because of the income

level of the intended occupants of the development, unless the local government imposes those requirements on developments generally or the requirements promote the availability of the residential development for lower income persons.

(6) California Government Code Section 65589.5 (the "California Planning and Zoning Law"). This law prohibits a local government agency from disapproving a housing development for low- and moderate-income households or conditioning approval in a manner which renders the project infeasible for development for use by low- and moderate-income households unless the local agency makes one of six findings justifying such disapproval or conditions.

(7) Section 3604(f)(B)(3) of Title 42 of the United States Code (the "Fair Housing Act") and Section 12927(c)(1) of the California Government Code (the "California Fair Employment and Housing Act"). These laws prohibit local government from refusing to make reasonable accommodations in policies and practices when these accommodations are necessary to afford persons with disabilities equal opportunity to use and enjoy a dwelling.

(8) Section 3304 of Article 33 of the San Francisco Police Code. This ordinance establishes, among other things, that local government engages in unlawful housing discrimination if the inclusion of restrictions, terms or conditions on real property transactions, the imposition of different conditions on financing for the construction, rehabilitation, or maintenance of real property, or the restriction of facilities for any tenant or lessee is based wholly or partially on race, religion, color, ancestry, age, sex, sexual orientation, gender identity, disability or place of birth.

(b) Federal, state and local fair housing laws require that departments, agencies, commissions, officers, and employees of the City and County of San Francisco shall not base any decision about housing development on evidence that discriminates against the classes protected by these laws.

(c) Federal, state and local fair housing laws require that departments, agencies, commissions, officers and employees of the City and County of San Francisco shall not impose, when approving a housing development, any conditions that discriminate against the classes protected by these laws.

(d) This ordinance will facilitate compliance with federal, state and local fair housing laws, and promote housing opportunities for residents of San Francisco.

(Added by Ord. 303-99, File No. 990494, App. 12/3/99)

SEC. 87.3. - DEFINITIONS.

(a) Protected Class. "Protected class" means those groups that receive protection from housing discrimination under the Fair Housing Act, 42 U.S.C. §§ 3601 et seq., the California Fair Employment and Housing Act, Government Code §§ 12900 et seq., Sections 65008 and 65589.5 of the Government Code, and Section 3304 of Article 33 of the San Francisco Police Code.

(b) City Entity. "City entity" includes the Board of Supervisors, the Executive Branch as described in Articles III, IV, and V of the Charter of the City and County of San Francisco, and any department, agency, commission, officer, employee, or advisory group of the City and County of San Francisco.

(c) Dwelling. "Dwelling" shall have the same meaning as the definition of "dwelling" in Section 3602 of Title 42 of the United States Code (the "Fair Housing Act").

(d) Fair Housing Laws. "Fair housing laws" shall mean those laws described in Section 87.2, above, together with any other federal, State or local laws related to housing discrimination.

(e) Family. "Family" shall have the same meaning as in Section 401 of the San Francisco Housing Code.

(f) Supportive Services. "Supportive services" means services that are provided to residents of a housing development and that are based on their particular needs and circumstances. These services include, but are not limited to, counseling, vocational training, case management, medical services, peer-based services, rehabilitative services, skills development, and recreational activities. The use of a portion of a residential building to provide supportive services for the building's residents shall be a permissible accessory use to the building.

(Added by Ord. 303-99, File No. 990494, App. 12/3/99)

SEC. 87.4. - COMPLIANCE WITH FAIR HOUSING LAWS.

When any City entity considers an application or proposal for the development, use, or funding of dwellings in which protected class members are likely to reside, or when any City entity applies existing City codes, regulations, or other standards to such dwellings, the City entity shall comply with all applicable fair housing laws and administer local policies, procedures, and practices in a manner that affirmatively furthers those laws.

(Added by Ord. 303-99, File No. 990494, App. 12/3/99)

SEC. 87.5. - NO DECISIONS BASED ON DISCRIMINATORY INFORMATION.

With respect to applications or proposals for the development, use, or funding of dwellings in which protected class members are likely to reside, a City entity shall not base any decision regarding the development, use, or funding of the dwellings on information which may be discriminatory to any member of a protected class. This discriminatory information includes, but is not limited to, the following:

- (a) That the dwellings will lower the property values of surrounding parcels of land because members of a protected class will reside in the dwellings;
- (b) That the dwellings will increase crime in the neighborhood because members of a protected class will reside in the dwellings;
- (c) That the dwellings will generate an increased demand for parking or generate more traffic because members of a protected class will reside in the dwellings;
- (d) That the dwellings will not be compatible with a neighborhood or community because members of a protected class will reside in the dwellings;
- (e) That the dwellings will increase the concentration of dwellings or services for members of a protected class in a particular neighborhood or area of the city;
- (f) That the dwellings will be detrimental to, or have a specific, adverse impact upon, the health, safety, convenience or general welfare of persons residing or working in the vicinity because members of a protected class will reside in the dwellings;
- (g) That the dwellings will be injurious to property, improvements or potential development in the vicinity because members of a protected class will reside in the dwellings;
- (h) That the dwellings will generate an increased demand for city services because members of a protected class will reside in the dwellings.

- (i) That the dwellings will not be appropriate for the neighborhood because supportive services will be provided to members of a protected class residing in the dwellings.

(Added by Ord. 303-99, File No. 990494, App. 12/3/99)

SEC. 87.6. - NONDISCRIMINATORY CONDITIONS OF APPROVAL.

With respect to applications or proposals for the development, use, or funding of dwellings in which protected class members are likely to reside, a City entity shall not impose on the approval of the dwellings (a) any condition that it does not impose on other dwellings of similar scale and size in the use district or zoning classification specified in the San Francisco Planning Code, or (b) any conditions of approval which are based on the fact that protected class members are likely to reside in the dwellings, including but not limited to restrictions on the activities of residents in or around the dwellings, restrictions on visitors to the dwellings, requirements for additional off-street parking, special review or monitoring of the dwellings by a City entity or neighborhood group, restrictions on services provided to residents, special design or maintenance requirements for the dwellings, and restrictions on future development on or near the site.

(Added by Ord. 303-99, File No. 990494, App. 12/3/99)

SEC. 87.7. - REASONABLE ACCOMMODATIONS.

With respect to applications or proposals for the development, use, or funding of dwellings in which protected class members are likely to reside, a City entity shall make reasonable accommodations in its rules, policies, practices, or services when those accommodations may be necessary to afford persons with disabilities equal opportunities to use and enjoy the dwellings.

(Added by Ord. 303-99, File No. 990494, App. 12/3/99)

SEC. 87.8. - NONDISCRIMINATORY APPLICATION OF STANDARDS.

Nothing in this Chapter shall be construed to prohibit a City entity from applying building and planning standards, design review, health and safety standards, environmental standards, or any other standards within the jurisdiction of the City entity as long as those standards are identical to those applied to other dwellings of similar scale and size in the use district or zoning classification specified in the San Francisco Planning Code, unless the City entity is required to make a reasonable accommodation under Section 87.7 of this Chapter.

(Added by Ord. 303-99, File No. 990494, App. 12/3/99)

SEC. 87.9. - APPLICABILITY.

This Chapter shall, among other things, apply to all actions, practices, and other decisions of any City entity having discretionary authority over permits, funding, conditions of approval, or other matters related to the development of dwellings. These actions, practices, and decisions include, but are not limited to, conditional use authorizations under Section 303 of the San Francisco Planning Code, variances under Section 305 of the San Francisco Planning Code, permits under Article 1 of Part III of the San Francisco Municipal Code, discretionary review of permits under Section 26 of Article 1 of Part III of the San Francisco Municipal Code, subdivision approvals under the San Francisco

Subdivision Code, permit approvals under the San Francisco Public Works Code, and any actions authorized under law by the Board of Appeals, the Building Inspection Commission, the Health Commission, and other city entities, regardless of whether the laws or regulations describing such discretionary authority specifically refer to the City entity's obligations under this Chapter.

(Added by Ord. 303-99, File No. 990494, App. 12/3/99)

SEC. 87.10. - COMPLIANCE BY STATE-AUTHORIZED AGENCIES.

Upon the effective date of this ordinance, the Mayor shall request, in writing, compliance with this ordinance by any state-authorized agency operating solely within the City and County of San Francisco and having authority over permits, funding, conditions of approval, or other matters related to the development of dwellings.

(Added by Ord. 303-99, File No. 990494, App. 12/3/99)

SEC. 87.11. - SEVERABILITY.

If any part or provision of this Chapter, or the application thereof to any person or circumstance, is held invalid, the remainder of the Chapter, including the application of such part or provision to other persons or circumstances, shall not be affected thereby and shall continue in full force and effect. To this end, provisions of this Chapter are severable.

(Added by Ord. 303-99, File No. 990494, App. 12/3/99)



Section 7

AFFH Through the Location of Affordable Housing

SECTION 7

AFFH THROUGH THE LOCATION OF AFFORDABLE HOUSING

A. BACKGROUND

A lack of affordable housing in and of itself, HUD has pointed out, is not an impediment to fair housing choice, unless it creates an impediment to housing choice *because* of membership in a protected class. However, recent court cases and recent events have demonstrated that the location of affordable housing is regarded as a means of AFFH. As a result of a court settlement, Westchester County (New York) must adopt a policy statement providing that “the location of affordable housing is central to fulfilling the commitment to AFFH because it determines whether such housing will reduce or perpetuate residential segregation.” (*United States of America ex rel. Anti-Discrimination Center of Metro New York, Inc. v. County of Westchester, New York*)

In order to meet the requirements of the settlement agreement, Westchester County must develop an implementation plan that includes, but is not limited, to:

- A model ordinance that the County will promote to municipalities to advance fair housing that shall include:
 - ✓ A model inclusionary housing ordinance that requires new development projects to include a certain percentage of affordable units, including criteria and standards for the affordable housing units and definitions of who is eligible for affordable housing;
 - ✓ Standards for affirmative marketing of new housing developments to ensure outreach to racially and ethnically diverse households;
 - ✓ Standards for expedited review of proposals for affordable housing that AFFH including procedures for streamlining the approval process for the design, permitting, and development of these units; and
 - ✓ Standards for legal mechanisms to ensure the continued affordability of new affordable units.

Housing developed pursuant to the plan:

- Must be located predominantly in municipalities where the African American and Hispanic population comprise less than 3% and 7% of the population, respectively.
- *Not* be developed in any census block which has an African American population of more than 10% and a total population of 20 or more.
- *Not* be developed in any census block which has a Hispanic population of more than 10% and total population of 20 or more.

The Westchester County settlement agreement demonstrates that a means to AFFH is by the development of affordable housing outside of areas with concentrations of minority populations.

Another example is the State of North Carolina which added “affordable housing” to the group of protected classes. The State passed an act providing that it is a violation of the State’s fair housing act to discriminate in land use decisions or the permitting of development based on the fact that a development contains affordable housing units. The Act states:

It is an unlawful discriminatory housing practice to discriminate in land-use decisions or in the permitting of development based on race, color, religion, sex, national origin, handicapping condition, familial status, or, except as otherwise provided by law, the fact that a development or proposed development contains affordable housing units for families or individuals with incomes below eighty percent (80%) of area median income. It is not a violation of this Chapter if land-use decisions or permitting of development is based on considerations of limiting high concentrations of affordable housing.

In 2000, Florida’s Affordable Housing Study Commission adopted a proposal made by 1000 Friends of Florida to amend the Florida Fair Housing Act by extending protection to affordable housing developments. Florida Statute 760.26 reads:

It is unlawful to discriminate in land use decisions or in the permitting of development based on race, color, national origin, sex, disability, familial status, religion, or, except as otherwise provided by law, the source of financing of a development or proposed development.

The decision to not specifically use the term “affordable housing” in statutory language has not diminished the intended application of Fair Housing Act protection, according to its advocates. Since enactment, county and city attorneys have regularly advised their commissions that affordable housing developments cannot be treated differently from market-rate developments in land use or permitting decisions.

In California, Government Code Section 65008 expressly prohibits localities from discriminating against residential development or emergency shelters if the intended occupants are low-income or if the development is subsidized (i.e., the method of financing).

B. DATA SOURCES

The purpose of the analysis was to determine whether affordable housing developments are concentrated in neighborhoods with a high concentration of minority populations and low income populations. Neighborhoods with “high concentrations” were determined as follows:

- Census tracts with 80% or more minority population
- Census tracts with 80% or more of the population having low incomes (that is, incomes less than 80% of the County’s median income)

Census 2000 is the data source for the minority population data. The low income population is based on HUD calculations, which are based on the Census 2000 data. The statistical information used by HUD in the calculation of the estimates comes from three tables in Summary File (SF) 3: P9 — Household Type (Including Living Alone) by Relationship; P76 — Family Income in 1999; and P79 — Non-family Household Income in 1999.

The inventory of affordable housing was determined primarily from two data sources:

- County of Orange, Orange County Community Services, *2009 County of Orange Affordable Rental Housing List*
- California Tax Credit Allocation Committee, *Active Projects Receiving Tax Credits 1987-2010 Year to Date*, May 2010

The affordable housing developments from these two sources were merged and duplicates were eliminated. The overall inventory was further refined by consulting the affordable housing lists maintained by the cities of Anaheim, Garden Grove and Santa Ana. Consulting these lists resulted in adding projects and eliminating a few in cases of duplicates due to different project names with same address.

Field surveys were necessary in a few cases because more than one project was located within in the same address range. Lastly, phone calls became necessary to confirm the city location of a project and the number of housing units.

The census tract location of each affordable housing development is identified in the CTAC list. The census tract location of all other projects was identified by using American Factfinder: U.S. Census Bureau, American Factfinder Website, Advanced Geography Search, Census Program Year, Address Search.

An analysis also was completed on the extent to which Section 8 assisted housing (families) is located in census tracts/neighborhoods with a high percentage (80%) of minority populations. Housing authorities encourage Section 8 voucher holders to find housing located outside areas of poverty and minority concentration. The Los Angeles Area Office of the U.S. Department of Housing and Urban Development reviewed the *Draft Regional AI* and requested the analysis of the location of Section 8 housing. Data on the census tract location of Section 8 voucher holders was provided by:

- Garden Grove Housing Authority (GGHA)
- Santa Ana Housing Authority (SAHA)
- Orange County Housing Authority (OCHA)

Data was unavailable from the Anaheim Housing Authority (AHA).

C. ANALYSIS OF THE LOCATION OF THE AFFORDABLE HOUSING INVENTORY

1. Affordable Housing Units Located in Neighborhoods with a High Percentage (>80%) of Minority Populations

Altogether there are 64 census tracts with a minority population of 80% or more. Attachment A on page 7-29 describes the population composition of the 64 census tracts. Table 7-1 (pages 7-5 and 7-6) shows the number of affordable housing units located in these “high concentration” census tracts as well as the percentage of affordable housing units located in those tracts and each tract’s percentage of all affordable housing units.

The merged database has a total of 20,379 affordable housing units located within the geographic area covered by the *Regional AI*. Attachment B (page 7-32) shows the affordable housing stock arranged by census tract. Within this *Regional AI* area, the affordable housing stock is not concentrated in neighborhoods with a high percentage (80%+) of minority populations for the reasons cited below:

- Forty-two of the high concentration census tracts have no affordable housing units.
- Almost 16% (3,200) of all affordable housing units (20,379) are located in 22 of 64 high concentration census tracts.
- 84% of the affordable housing stock is located in census tracts with less than 80% minority population.
- About 8% of the affordable housing stock is located in three census tracts: 744.03 (Santa Ana); 751.02 (Santa Ana); and Anaheim (866.01).

There are five census tracts where affordable housing units represent a high percentage of tract's total housing stock:

▪ Santa Ana	744.03	38.2%, 500 of 1,310
▪ Santa Ana	745.01	23.4%, 326 of 1,391
▪ Santa Ana	750.02	21.1%, 496 of 2,348
▪ Anaheim	866.01	24.5%, 576 of 2,348
▪ Stanton/Anaheim	878.03	21.6%, 298 of 1,379

Table 7-2 on page 7-7 lists the individual developments which are located in these five census tracts.

The three developments located in census tracts 744.03 and 745.01 are located in close proximity. Refer to Map 1 on page 7-8. The rear property line of Minnie Street is essentially the boundary between the two census tracts.

Table 7-1
Regional Analysis of Fair Housing Impediments
Affordable Housing Units Located in Neighborhoods
With a High Percentage (>80%) of Minority Populations -2010

Census Tract	City	Percent Minority	Total Housing Units 2008 ¹	Number of Affordable Housing Units ²	Percent of Units in Census Tract	Percent of All Affordable Units
12.01	La Habra/County	81.55%	1,461	0	0.0%	0.0%
116.02	Fullerton/Anaheim	82.82%	1,647	16	1.0%	0.1%
117.14	Anaheim	80.79%	82	0	0.0%	0.0%
117.2	Anaheim/Placentia	92.54%	1,518	54	3.6%	0.3%
740.03	Santa Ana	94.97%	810	6	0.7%	0.0%
740.05	Santa Ana	86.27%	1,478	0	0.0%	0.0%
741.02	Santa Ana	92.95%	1,301	0	0.0%	0.0%
741.03	Santa Ana	92.59%	918	0	0.0%	0.0%
741.08	Santa Ana	94.08%	887	0	0.0%	0.0%
741.09	Santa Ana	95.04%	663	0	0.0%	0.0%
741.11	Santa Ana	80.83%	1,370	0	0.0%	0.0%
742	Santa Ana	94.76%	1,747	0	0.0%	0.0%
743	Santa Ana	96.67%	797	0	0.0%	0.0%
744.03	Santa Ana	95.32%	1,310	500	38.2%	2.5%
744.05	Santa Ana	94.67%	1,468	24	1.6%	0.1%
744.06	Santa Ana	91.90%	847	0	0.0%	0.0%
744.07	Santa Ana/Tustin	92.55%	1,866	0	0.0%	0.0%
745.01	Santa Ana	99.00%	1,391	326	23.4%	1.6%
745.02	Santa Ana	97.17%	1,010	0	0.0%	0.0%
746.01	Santa Ana	92.94%	1,675	3	0.2%	0.0%
746.02	Santa Ana	97.06%	1,691	0	0.0%	0.0%
747.01	Santa Ana	97.82%	1,410	0	0.0%	0.0%
747.02	Santa Ana	95.96%	1,096	0	0.0%	0.0%
748.01	Santa Ana	98.29%	986	8	0.8%	0.0%
748.02	Santa Ana	93.79%	1,109	60	5.4%	0.3%
748.03	Santa Ana	92.24%	1,781	0	0.0%	0.0%
748.05	Santa Ana	97.68%	1,123	112	10.0%	0.5%
748.06	Santa Ana	98.70%	910	0	0.0%	0.0%
749.01	Santa Ana	98.17%	1,924	204	10.6%	1.0%
749.02	Santa Ana	98.60%	1,184	12	1.0%	0.1%
750.02	Santa Ana	95.57%	2,348	496	21.1%	2.4%
750.03	Santa Ana	96.37%	1,729	48	2.8%	0.2%
750.04	Santa Ana	95.73%	1,316	4	0.3%	0.0%
752.01	Santa Ana	97.28%	1,107	0	0.0%	0.0%
752.02	Santa Ana	94.75%	1,186	0	0.0%	0.0%
753.02	Santa Ana	81.51%	1,125	0	0.0%	0.0%
864.04	Anaheim	81.97%	1,503	0	0.0%	0.0%

Table 7-1 continued
Regional Analysis of Fair Housing Impediments
Affordable Housing Units Located in Neighborhoods
With a High Percentage (>80%) of Minority Populations -2010

Census Tract	City	Percent Minority	Total Housing Units 2008 ¹	Number of Affordable Housing Units ²	Percent of Units in Census Tract	Percent of All Affordable Units
864.05	Anaheim	82.83%	1,658	0	0.0%	0.0%
865.01	Anaheim	84.58%	1,172	0	0.0%	0.0%
865.02	Anaheim	92.36%	1,389	0	0.0%	0.0%
866.01	Anaheim	87.29%	2,348	576	24.5%	2.8%
873	Anaheim	85.04%	2,839	151	5.3%	0.7%
874.03	Anaheim	85.78%	813	0	0.0%	0.0%
874.04	Anaheim	91.47%	786	0	0.0%	0.0%
874.05	Anaheim	89.23%	1,609	0	0.0%	0.0%
875.04	Anaheim	87.42%	1,937	0	0.0%	0.0%
878.03	Stanton/Anaheim	86.62%	1,379	298	21.6%	1.5%
879.02	Stanton	82.08%	1,311	0	0.0%	0.0%
888.01	Garden Grove	81.15%	2,604	0	0.0%	0.0%
889.02	Garden Grove	81.33%	1,199	80	6.7%	0.4%
889.03	Garden Grove/Santa Ana	85.75%	1,942	0	0.0%	0.0%
889.04	Westminster/Garden Grove	82.05%	1,418	0	0.0%	0.0%
890.01	Santa Ana	89.52%	1,668	0	0.0%	0.0%
890.03	Garden Grove	88.55%	862	0	0.0%	0.0%
890.04	Santa Ana	89.08%	1,791	60	3.4%	0.3%
891.02	Garden Grove/Santa Ana	81.56%	1,607	0	0.0%	0.0%
891.04	Santa Ana/Garden Grove	92.61%	1,358	194	14.3%	1.0%
891.05	Santa Ana	96.72%	1,132	12	1.1%	0.1%
891.06	Garden Grove	81.79%	930	0	0.0%	0.0%
992.02	Santa Ana/Fountain Valley	82.73%	1,832	0	0.0%	0.0%
992.47	Santa Ana	88.88%	798	0	0.0%	0.0%
992.48	Santa Ana	88.67%	1,420	0	0.0%	0.0%
992.49	Santa Ana	97.28%	820	0	0.0%	0.0%
1106.1	Buena Park	83.52%	1,303	0	0.0%	0.0%
Total			87,699	3,232	3.7%	15.9%

Note: The merged database has a total of 20,379 affordable units in the area covered by the *Regional AI*

¹California State University, Fullerton, Center for Demographic Research, *Orange County Population & Dwelling Unit Estimates by Census Tract*, January 1, 2008

²Number of affordable housing units per census tract is obtained from Attachment B on page 7-32.

Table construction by Castañeda & Associates

Table 7-2
Regional Analysis of Fair Housing Impediments
Census Tracts with a High Percentage of Affordable Housing Units

City/Location	Census Tract	Project(s)	Number of Affordable Units
Santa Ana	744.03	Warwick Square	500
Santa Ana	745.01	Wakeham Grant Apartments	126
		Cornerstone Village	200
Santa Ana	750.02	Heninger Village Apartments	58
		Santa Ana Towers	198
		Rosswood Villas	198
		Garden Court	42
Anaheim	866.01	Park Vista Apartments	390
		Paseo Village	174
		Casa Delia	12
Stanton/Anaheim	878.03	Continental Garden Apartments	298

Although near one another, Warwick Square is physically separated from the Minnie Street developments by physical barriers (Metrolink and the Santa Ana-Santa Fe Channel). More importantly, all three complexes were constructed before State law required localities to conduct housing policy planning (i.e., the housing element of the general plan). Warwick Square was built in 1969. The Wakeman Grant Apartments were built in 1961. The Cornerstone Village dwellings were constructed in 1959 and rehabilitated in 2000. In effect, at least for the last two developments, the housing complexes probably accommodated the population already residing in the developments at the time of rehabilitation or the population living near the developments.

Map 1
Santa Ana: Warwick Square and Minnie Street Developments
Census Tracts 744.03 and 745.01



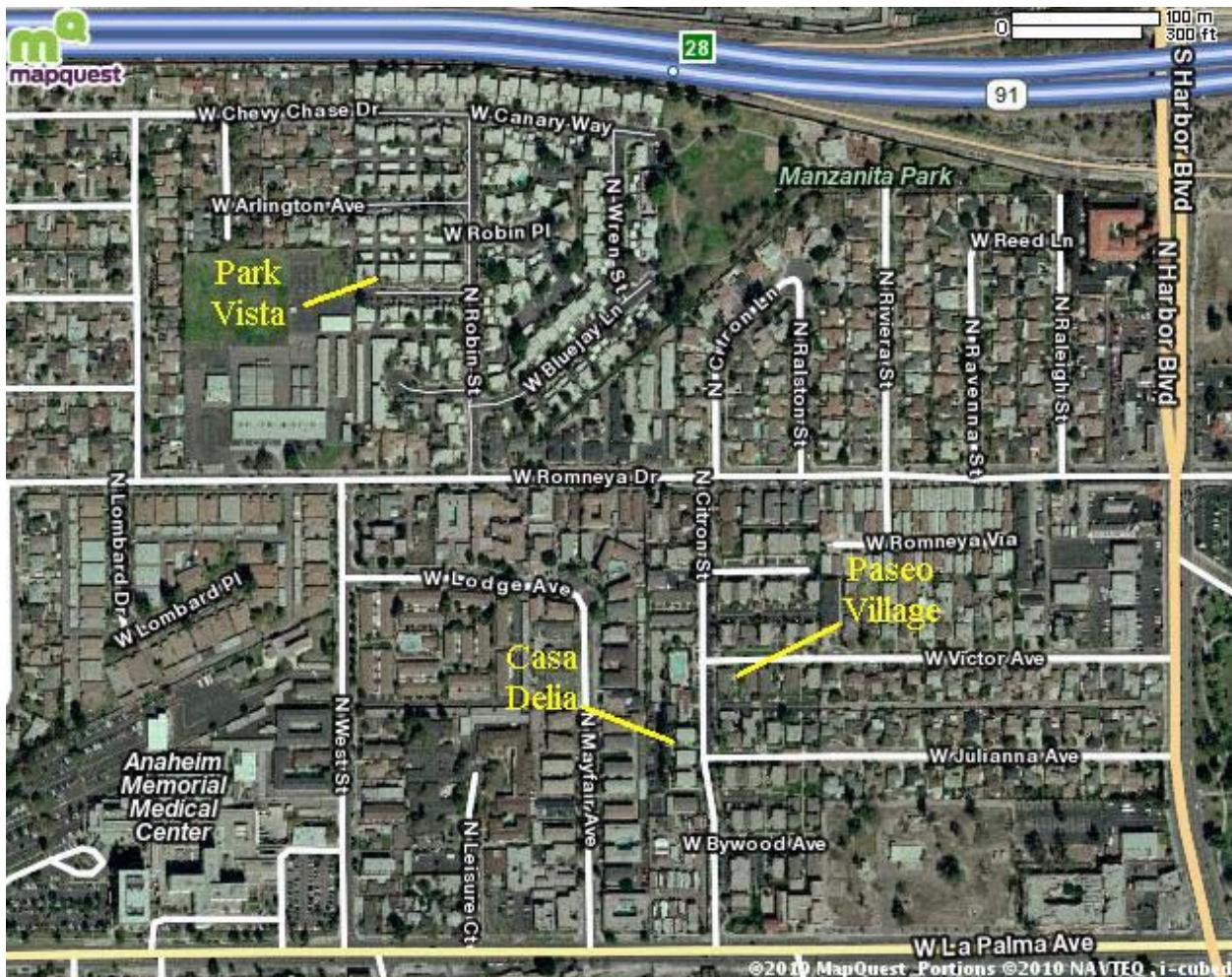
Map 2 below shows the locations of the four affordable housing developments located in downtown Santa Ana. Three developments contain a total of 454 senior (62+) housing units. Two developments (Santa Ana Towers and Rosswood Villas) were built in the mid-1970s. The third senior housing complex (Henninger Village) was constructed in 1988 and rehabilitated in 2001. Built in 1986, the Garden Court complex has 42 of the 84 family housing units rent restricted.

Map 2
Santa Ana: Downtown Santa Ana Affordable Housing Developments
Census Tract 750.02



Census tract 866.01, which is located in Anaheim, contains three family projects having a total of 576 housing units. Map 3 below shows the locations of the three developments. The construction dates for these developments are: Park Vista, 1958; Paseo Village, 1957; and Casa Delia, 1961. These developments, like many others located in high concentrations areas, were built before local housing policy planning was required and probably became affordable as a result of acquisition/rehabilitation programs. As a result, the housing complexes probably accommodated the population already residing in the developments at the time of rehabilitation or the population living near the developments.

Map 3
Anaheim: Park Vista, Paseo Village and Casa Delia
Census Tract 866.01



2. Affordable Housing Units Located in Neighborhoods with a Low Percentage (<20%) of Minority Populations

This part examines the existence of affordable housing opportunities in neighborhoods (census tracts) with a low percentage (<20%) of minority populations. Altogether there are 74 census tracts that meet the definition of a neighborhood with a low percentage of minority populations. Thirteen of the 74 census tracts have affordable housing units. In sum, there are 1,108 affordable housing units located in the 13 census tracts, which represents 5.4% of all the affordable housing located within the area covered by the *Regional AI*.

Consequently, it can be stated that affordable housing opportunities exist in neighborhoods with a low percentage of minority populations. The affordable housing units are located in the following cities and communities:

- Newport Beach 442
- Huntington Beach 185
- Laguna Beach 135
- Irvine 118
- Yorba Linda 100
- Dana Point 84
- Ladera Ranch 44

Table 7-3 on the next two pages lists the number of affordable housing units located in these “low concentration” census tracts as well as the percentage of affordable housing units located in those tracts and each tract’s percentage of all affordable housing units.

Table 7-3
Regional Analysis of Fair Housing Impediments
Affordable Housing Units Located in Neighborhoods
With a Low Percentage (<20%) of Minority Populations -2010

Census Tract	City/Area	Percent Minority	Total Housing Units 2008	Number of Affordable Housing Units	Percent of Units in Tract	Percent of All Affordable Housing Units
993.10	Huntington Beach	19.79%	2,227	0	0.0%	0.0%
994.07	Huntington Beach	19.75%	968	11	1.1%	0.1%
423.25	Laguna Beach	19.75%	1,550	0	0.0%	0.0%
992.20	Huntington Beach	19.68%	2,407	68	2.8%	0.3%
993.06	Huntington Beach	19.63%	2,836	0	0.0%	0.0%
219.12	Orange/Unincorporated	19.46%	1,379	0	0.0%	0.0%
524.15	Lake Forest	19.32%	1,315	0	0.0%	0.0%
114.02	Fullerton	19.24%	874	0	0.0%	0.0%
992.43	Huntington Beach	19.17%	1,844	0	0.0%	0.0%
320.42	Rancho Santa Margarita/Uninc.	19.14%	1,778	0	0.0%	0.0%
631.02	Unincorporated	19.11%	2,803	0	0.0%	0.0%
993.07	Huntington Beach	18.38%	1,457	0	0.0%	0.0%
993.11	Huntington Beach	18.10%	2,230	0	0.0%	0.0%
995.12	Seal Beach	18.08%	1,776	0	0.0%	0.0%
218.09	Yorba Linda	18.04%	881	100	11.4%	0.5%
757.03	Unincorporated	17.94%	1,384	0	0.0%	0.0%
219.17	Orange/Unincorporated	17.71%	1,195	0	0.0%	0.0%
1100.06	Unincorporated	17.56%	1,102	0	0.0%	0.0%
626.45	Newport Beach/Uninc.	17.35%	2,692	0	0.0%	0.0%
218.16	Yorba Linda/Uninc.	17.26%	1,770	0	0.0%	0.0%
1100.08	Seal Beach	17.19%	1,731	0	0.0%	0.0%
995.14	Huntington Beach	17.09%	2,455	0	0.0%	0.0%
992.17	Huntington Beach	16.67%	891	0	0.0%	0.0%
320.23	Unincorporated	16.45%	4,345	0	0.0%	0.0%
626.05	Laguna Beach	16.31%	2,183	65	3.0%	0.3%
421.03	Unincorporated	15.74%	3,430	0	0.0%	0.0%
423.28	Laguna Hills	15.17%	843	0	0.0%	0.0%
1100.07	Los Alamitos	14.72%	1,686	0	0.0%	0.0%
320.43	Rancho Santa Margarita	14.65%	1,249	0	0.0%	0.0%
993.09	Huntington Beach	14.64%	1,702	106	6.2%	0.5%
636.03	Newport Beach	14.39%	3,293	91	2.8%	0.4%
995.13	Huntington Beach/Uninc.	14.35%	1,337	0	0.0%	0.0%
995.11	Seal Beach	14.26%	2,032	0	0.0%	0.0%
423.38	Dana Point	13.86%	2,050	0	0.0%	0.0%
320.46	Coto de Caza	13.68%	1,878	0	0.0%	0.0%
421.13	Dana Point	13.56%	1,851	0	0.0%	0.0%
633.02	Newport Beach	13.40%	1,727	0	0.0%	0.0%
630.10	Newport Beach	13.29%	3,372	0	0.0%	0.0%

Table 7-3 continued
Regional Analysis of Fair Housing Impediments
Affordable Housing Units Located in Neighborhoods
With a Low Percentage (<20%) of Minority Populations -2010

Census Tract	City/Area	Percent Minority	Total Housing Units 2008	Number of Affordable Housing Units	Percent of Units in Tract	Percent of All Affordable Housing Units
995.06	Seal Beach/Uninc.	12.71%	863	0	0.0%	0.0%
320.52	Ladera Ranch	12.67%	8,124	44	0.5%	0.2%
320.44	Coto de Caza	12.60%	2,013	0	0.0%	0.0%
626.44	Newport Beach	12.52%	3,479	99	2.8%	0.5%
995.04	Seal Beach	12.47%	999	0	0.0%	0.0%
626.32	Laguna Beach	12.40%	2,191	70	3.2%	0.3%
630.09	Newport Beach	12.27%	752	0	0.0%	0.0%
992.44	Huntington Beach	12.19%	1,928	0	0.0%	0.0%
630.07	Newport Beach	12.04%	3,326	133	4.0%	0.7%
631.03	Newport Beach/Uninc.	11.64%	1,097	0	0.0%	0.0%
423.23	Dana Point	11.64%	2,717	0	0.0%	0.0%
423.24	Dana Point	11.51%	2,282	84	3.7%	0.4%
635.00	Newport Beach	11.48%	3,586	0	0.0%	0.0%
626.42	Newport Beach	11.32%	1,611	0	0.0%	0.0%
630.08	Newport Beach	11.29%	658	0	0.0%	0.0%
626.20	Laguna Beach	11.26%	2,663	0	0.0%	0.0%
626.22	Laguna Hills/Laguna Woods	10.75%	2,992	0	0.0%	0.0%
422.06	Dana Point	10.65%	1,459	0	0.0%	0.0%
626.04	Irvine	10.53%	6,267	118	1.9%	0.6%
320.11	Unincorporated	10.33%	826	0	0.0%	0.0%
630.04	Newport Beach	10.23%	3,491	119	3.4%	0.6%
628.00	Newport Beach	9.78%	3,031	0	0.0%	0.0%
320.37	Unincorporated	9.30%	2,437	0	0.0%	0.0%
423.05	Laguna Beach/Dana Point	8.59%	1,991	0	0.0%	0.0%
626.19	Laguna Beach	8.56%	2,063	0	0.0%	0.0%
627.02	Newport Beach	8.35%	2,702	0	0.0%	0.0%
995.10	Seal Beach	8.13%	3,644	0	0.0%	0.0%
630.05	Newport Beach	8.13%	1,023	0	0.0%	0.0%
626.23	Laguna Beach/Laguna Hills/Laguna Woods	8.07%	4,584	0	0.0%	0.0%
627.01	Newport Beach	7.86%	1,651	0	0.0%	0.0%
421.06	Dana Point/Uninc.	7.49%	738	0	0.0%	0.0%
634.00	Newport Beach	7.37%	2,207	0	0.0%	0.0%
626.46	Laguna Woods	6.84%	2,979	0	0.0%	0.0%
630.06	Newport Beach	6.83%	2,148	0	0.0%	0.0%
995.09	Seal Beach	6.48%	2,950	0	0.0%	0.0%
629.00	Newport Beach	5.33%	944	0	0.0%	0.0%
Total			160,939	1,108	0.7%	5.4%

3. Affordable Housing Units Located in Neighborhoods with a High Percentage (>80%) of Low Income Populations

Table 7-4 on the next page shows the number of affordable housing units located in 18 census tracts with a high percentage (80%+) of low income population. As previously indicated, the merged database has a total of 20,379 affordable housing units located within the geographic area covered by the *Regional AI*. Within this geographic area, the affordable housing stock is not concentrated in neighborhoods with a high percentage (80%+) of low income population for the reasons cited below:

- Nine of the 18 high percentage census tracts have zero or less than 12 affordable housing units.
- Only about 10% (2,055) of all affordable housing units (20,379) are located in census tracts with a high percentage of low income population.
- About 90% of all affordable housing units are located outside census tracts with a high percentage of low income population.

There are three census tracts that have high percentages of *both* minority and low income populations *and* a large percentage of affordable housing units located within the tracts: 744.03, 745.01 and 750.02. These tracts are located in Santa Ana and Maps 1 and 2 show the locations of the affordable housing developments.

4. Affordable Housing Units Located in Neighborhoods with a Low Percentage (<20%) of Low Income Populations

Table 7-5 (on pages 7-16 to 7-18) shows that affordable housing opportunities exist in census tracts with a low percentage of low income populations. Fourteen of the 101 census tracts with a low percentage of low income populations have affordable housing units. Almost 6% of all the affordable housing units are located in neighborhoods having 20% or less of its population with low incomes. However, the number of affordable housing units (1,205) represents a very small percentage (0.6%) of the housing stock (186,329) located in these census tracts.

The affordable housing opportunities are located in the following cities and communities:

▪ Aliso Viejo	174
▪ Anaheim	157
▪ Cypress	13
▪ Dana Point	84
▪ Fullerton	24
▪ Irvine	183
▪ Ladera Ranch	44
▪ Laguna Beach	70
▪ Newport Beach	232
▪ Yorba Linda	224

Table 7-4
Regional Analysis of Fair Housing Impediments
Affordable Housing Units Located in Neighborhoods
With a High Percentage (>80%) of Low Income Populations-2010

City	Census Tract	# Low/Mod	Total Pop.	Percent Low/Mod	Total Housing Units 2008 ¹	Number of Affordable Housing Units ²	Percent of Units in Census Tract	Percent of All Affordable Units
Anaheim/Placentia	117.20	6,097	7,535	80.9%	1,518	54	3.6%	0.3%
Santa Ana	744.03	5,556	6,374	87.2%	1,310	500	38.2%	2.5%
Santa Ana	744.05	6,024	6,766	89.0%	1,468	24	1.6%	0.1%
Santa Ana	744.06	3,132	3,706	84.5%	847	0	0.0%	0.0%
Santa Ana/Tustin	744.07	6,651	7,687	86.5%	1,866	0	0.0%	0.0%
Santa Ana	745.01	10,197	12,055	84.6%	1,391	326	23.4%	1.6%
Santa Ana	748.05	5,577	6,710	83.1%	1,123	112	10.0%	0.5%
Santa Ana	748.06	5,080	6,136	82.8%	910	0	0.0%	0.0%
Santa Ana	749.01	8,512	10,102	84.3%	1,924	204	10.6%	1.0%
Santa Ana	749.02	6,122	7,243	84.5%	1,184	12	1.0%	0.1%
Santa Ana	750.02	8,000	9,466	84.5%	2,348	496	21.1%	2.8%
Santa Ana	750.03	7,198	8,200	87.8%	1,729	48	2.8%	0.2%
Santa Ana	750.04	4,865	5,713	85.2%	1,316	4	0.3%	0.0%
Orange/Villa Park*	758.11	1,354	1,569	86.3%	828	0	0.0%	0.0%
Anaheim	865.02	5,488	6,669	82.3%	1,389	0	0.0%	0.0%
Anaheim	874.05	5,489	6,580	83.4%	1,609	0	0.0%	0.0%
Santa Ana/Garden Grove	891.04	4,303	5,085	84.6%	1,358	194	14.3%	1.0%
Santa Ana	891.05	5,935	6,991	84.9%	1,132	12	1.1%	0.1%
Total		105,580	124,587	84.7%	25,250	2,055	8.1%	10.1%

*All of the Low/Mod population is located within the City of Orange, 1,354 of 1,490 (90.9%).

Note: The merged database has a total of 20,379 affordable units in Orange County.

¹California State University, Fullerton, Center for Demographic Research, *Orange County Population & Dwelling Unit Estimates by Census Tract*, January 1, 2008

²Number of affordable housing units per census tract is obtained from Attachment B on page 7-28.

Table construction by Castañeda & Associates

Table 7-5
Regional Analysis of Fair Housing Impediments
Affordable Housing Units Located in Neighborhoods
With a Low Percentage (<20%) of Low Income Populations-2010

Census Tract	City	Percent Minority	Total Housing Units 2008	Number of Affordable Housing Units	Percent of Units in Census Tract	Percent of All Affordable Units
16.02	Fullerton	13.8%	1,858	0	0.0%	0.0%
17.06	Fullerton	19.1%	1,373	24	1.7%	0.1%
114.02	Fullerton	16.4%	874	0	0.0%	0.0%
117.15	Placentia/Unincorporated	14.6%	2,058	0	0.0%	0.0%
117.18	Placentia/Unincorporated	17.8%	1,110	0	0.0%	0.0%
218.09	Yorba Linda	19.8%	881	100	11.4%	0.5%
218.10	Yorba Linda/Placentia	19.8%	1,226	0	0.0%	0.0%
218.20	Yorba Linda/Placentia	19.2%	1,380	0	0.0%	0.0%
218.23	Yorba Linda	17.5%	1,057	0	0.0%	0.0%
218.24	Yorba Linda	11.0%	867	0	0.0%	0.0%
218.25	Yorba Linda	16.3%	1,158	124	10.7%	0.6%
218.27	Yorba Linda	11.7%	1,079	0	0.0%	0.0%
218.28	Yorba Linda	5.4%	1,331	0	0.0%	0.0%
218.29	Yorba Linda	11.4%	1,812	0	0.0%	0.0%
218.30	Yorba Linda	12.1%	2,037	0	0.0%	0.0%
219.05	Anaheim	19.5%	1,803	27	1.5%	0.1%
219.12	Orange	10.3%	1,379	0	0.0%	0.0%
219.15	Anaheim/Orange	19.7%	1,501	0	0.0%	0.0%
219.17	Orange/Unincorporated	13.7%	1,195	0	0.0%	0.0%
219.20	Anaheim	12.9%	2,326	0	0.0%	0.0%
219.21	Anaheim	11.7%	1,427	0	0.0%	0.0%
219.22	Anaheim	15.1%	2,266	130	5.7%	0.6%
219.23	Anaheim	13.2%	2,322	0	0.0%	0.0%
219.24	Anaheim/Unincorporated	15.3%	1,532	0	0.0%	0.0%
320.11	Unincorporated	15.4%	826	0	0.0%	0.0%
320.34	Rancho Santa Margarita	14.5%	1,852	0	0.0%	0.0%
320.41	Unincorporated	12.1%	411	0	0.0%	0.0%
320.42	Rancho Santa Margarita	13.6%	1,778	0	0.0%	0.0%
320.43	Rancho Santa Margarita	6.9%	1,249	0	0.0%	0.0%
320.44	Coto de Caza	9.0%	2,013	0	0.0%	0.0%
320.45	Coto de Caza	11.3%	922	0	0.0%	0.0%
320.46	Coto de Caza	5.5%	1,878	0	0.0%	0.0%
320.48	Rancho Santa Margarita	11.5%	2,255	0	0.0%	0.0%
320.49	Rancho Santa Margarita/Unincorporated	11.9%	3,106	0	0.0%	0.0%
320.50	Rancho Santa Margarita	16.6%	1,740	0	0.0%	0.0%
320.52	Ladera Ranch	19.2%	8,124	44	0.5%	0.2%

Table 7-5 continued
Regional Analysis of Fair Housing Impediments
Affordable Housing Units Located in Neighborhoods
With a Low Percentage (<20%) of Low Income Populations-2010

Census Tract	City	Percent Minority	Total Housing Units 2008	Number of Affordable Housing Units	Percent of Units in Census Tract	Percent of All Affordable Units
320.53	Rancho Santa Margarita/Unincorporated	18.5%	3,095	0	0.0%	0.0%
320.56	Rancho Santa Margarita/Unincorporated	6.5%	2,002	0	0.0%	0.0%
423.05	Laguna Beach/Dana Point	18.6%	1,991	0	0.0%	0.0%
423.07	Laguna Hills	19.0%	2,316	0	0.0%	0.0%
423.24	Dana Point	14.3%	2,282	84	3.7%	0.4%
423.27	Laguna Hills	15.7%	1,735	0	0.0%	0.0%
423.28	Laguna Hills	14.7%	843	0	0.0%	0.0%
423.33	Laguna Hills	5.4%	1,332	0	0.0%	0.0%
423.35	Unincorporated	17.0%	2,300	0	0.0%	0.0%
524.04	Unincorporated	0.0%	979	0	0.0%	0.0%
524.08	Lake Forest	15.8%	2,153	0	0.0%	0.0%
524.15	Lake Forest	12.5%	1,315	0	0.0%	0.0%
524.17	Irvine	18.7%	2,302	0	0.0%	0.0%
524.20	Irvine	6.1%	6,304	0	0.0%	0.0%
524.21	Irvine	13.3%	1,964	0	0.0%	0.0%
524.22	Lake Forest	18.9%	1,491	0	0.0%	0.0%
524.26	Lake Forest/Unincorporated	8.9%	2,217	0	0.0%	0.0%
524.27	Lake Forest	12.4%	1,741	0	0.0%	0.0%
524.28	Lake Forest/Unincorporated	12.8%	2,181	0	0.0%	0.0%
525.06	Irvine	16.0%	828	0	0.0%	0.0%
525.22	Irvine	12.9%	1,446	59	4.1%	0.3%
525.23	Irvine	15.1%	1,544	0	0.0%	0.0%
525.26	Irvine	19.5%	1,366	0	0.0%	0.0%
525.27	Irvine	19.2%	2,713	124	4.6%	0.6%
626.20	Laguna Beach	18.3%	2,663	0	0.0%	0.0%
626.30	Irvine	16.7%	801	0	0.0%	0.0%
626.31	Irvine	7.9%	1,275	0	0.0%	0.0%
626.32	Laguna Beach	19.8%	2,191	70	3.2%	0.3%
626.33	Aliso Viejo	7.0%	1,742	0	0.0%	0.0%
626.34	Aliso Viejo	16.8%	2,066	0	0.0%	0.0%
626.35	Aliso Viejo/Laguna Woods	15.1%	1,713	0	0.0%	0.0%
626.38	Aliso Viejo	13.3%	2,432	0	0.0%	0.0%
626.39	Aliso Viejo	17.6%	2,504	174	6.9%	0.9%
626.43	Newport Beach	10.0%	2,017	0	0.0%	0.0%
626.44	Newport Beach	17.6%	3,479	99	2.8%	0.5%
626.45	Newport Beach	9.3%	2,692	0	0.0%	0.0%

Table 7-5 continued
Regional Analysis of Fair Housing Impediments
Affordable Housing Units Located in Neighborhoods
With a Low Percentage (<20%) of Low Income Populations-2010

Census Tract	City	Percent Minority	Total Housing Units 2008	Number of Affordable Housing Units	Percent of Units in Census Tract	Percent of All Affordable Units
627.01	Newport Beach	16.1%	1,651	0	0.0%	0.0%
627.02	Newport Beach	17.3%	2,702	0	0.0%	0.0%
629.00	Newport Beach	19.6%	944	0	0.0%	0.0%
630.05	Newport Beach	15.0%	1,023	0	0.0%	0.0%
630.07	Newport Beach	18.6%	3,326	133	4.0%	0.7%
630.08	Newport Beach	12.5%	658	0	0.0%	0.0%
630.09	Newport Beach/Unincorporated	18.4%	752	0	0.0%	0.0%
630.10	Newport Beach	19.4%	3,372	0	0.0%	0.0%
636.01	Newport Beach	12.8%	1,393	0	0.0%	0.0%
756.04	Orange/Unincorporated	12.6%	2,726	0	0.0%	0.0%
756.05	Orange/Unincorporated	12.7%	2,198	0	0.0%	0.0%
756.06	Unincorporated	8.8%	2,270	0	0.0%	0.0%
757.03	Unincorporated	18.9%	1,384	0	0.0%	0.0%
758.09	Villa Park/Orange	13.7%	1,092	0	0.0%	0.0%
758.10	Villa Park/Orange	15.9%	1,033	0	0.0%	0.0%
758.14	Orange/Villa Park	14.0%	1,184	0	0.0%	0.0%
992.38	Huntington Beach	18.4%	1,396	0	0.0%	0.0%
992.39	Huntington Beach	19.3%	1,379	0	0.0%	0.0%
992.40	Huntington Beach	18.8%	2,166	0	0.0%	0.0%
992.43	Huntington Beach	19.8%	1,844	0	0.0%	0.0%
992.46	Huntington Beach	12.6%	1,241	0	0.0%	0.0%
993.08	Huntington Beach	10.3%	2,256	0	0.0%	0.0%
994.15	Huntington Beach	11.2%	2,095	0	0.0%	0.0%
995.04	Seal Beach	19.7%	999	0	0.0%	0.0%
995.13	Huntington Beach/Unincorporated	18.5%	1,337	0	0.0%	0.0%
995.14	Huntington Beach	9.8%	2,455	0	0.0%	0.0%
1100.07	Unincorporated/Seal Beach	15.7%	1,686	0	0.0%	0.0%
1100.11	Cypress	12.2%	1,112	13	1.2%	0.1%
1100.12	Seal Beach/Los Alamitos	14.6%	1,867	0	0.0%	0.0%
1101.18	Cypress	16.9%	767	0	0.0%	0.0%
Total			186,329	1,205	0.6%	5.9%

D. ANALYSIS OF THE LOCATION OF THE SECTION 8 HOUSING INVENTORY

1. Garden Grove Housing Authority (GGHA)

The GGHA administers 2,504 Section 8 Housing Choice Vouchers. Of this total, 2,489 voucher holders reside in Garden Grove and other cities participating in the *Regional AI*. Table 7-6 below lists the city residence of the Section 8 voucher holders. About 80.5% of the voucher holders live in Garden Grove (2,003 of 2,489). This table also lists the four census tracts having 5% or more of the Garden Grove's Section 8 voucher holders.

Table 7-6
Garden Grove Housing Authority
Section 8 Assisted Families by City

City	Number of Families
Anaheim	89
Buena Park	4
Cypress	0
Fountain Valley	13
Garden Grove Census Tract 881.07	137
Garden Grove Census Tract 887.01	156
Garden Grove Census Tract 889.01	135
Garden Grove Census Tract 891.04	265
Garden Grove-Balance of City	1,310
Huntington Beach	29
Irvine	19
La Habra	1
Laguna Woods	1
Newport Beach	3
Orange	14
Stanton	21
Westminster	160
Yorba Linda	2
Split Tracts*	130
Total	2,489

Source: Garden Grove Housing Authority

*The data was provided by Census Tract and these tracts were split between two or more cities.

Note: Census tracts listed have 5% (125) or more of the total (2,489) Section 8 assisted households.

Tabulation by Castañeda & Associates

Table 7-7 below identifies the number of Section 8 voucher holders residing in census tracts with a high percentage (80%+) of minority populations. Only about one-fourth (660 of 2,489) of the GGHA voucher holders live in census tracts with a high percentage of minority populations. Within these census tracts Section 8 assisted housing – for the most part - comprises a small percentage of all the housing units. Only in census tract 891.04 does Section 8 housing comprise a “high” percentage (23.4%) of all the housing units located in a census tract. Consequently, the vast majority (75%) of Section 8 assisted housing is located in census tracts that do not have a high percentage of minority populations.

Table 7-7
Garden Grove Housing Authority
Number of Section 8 Housing Units Located in Census Tracts
With a High Percentage (>80%) of Minority Populations

Census Tract	City	Total Population ¹	Percent Minority	# of Section 8 Assisted Units
891.04	Santa Ana/Garden Grove	6,074	92.61%	265
874.05	Anaheim	6,649	89.23%	1
890.03	Garden Grove	3,808	88.55%	63
875.04	Anaheim	8,248	87.42%	4
866.01	Anaheim	9,872	87.29%	1
874.03	Anaheim	3,735	85.78%	2
889.03	Garden Grove/Santa Ana	8,594	85.75%	84
873.00	Anaheim	10,041	85.04%	1
116.02	Anaheim	5,762	82.82%	1
891.06	Garden Grove	3,784	81.79%	96
891.02	Garden Grove	6,954	81.56%	20
12.01	La Habra/County	5,371	81.55%	1
888.01	Garden Grove	8,206	81.15%	121
Total				660

¹2000 population

Source: Garden Grove Housing Authority

Tabulation by Castañeda & Associates

2. Santa Ana Housing Authority (SAHA)

The SAHA administers Section 8 Housing Choice Vouchers predominately within the City of Santa Ana. Data on the census tract location of the voucher holders was provided by the SAHA. However, the census tract location is not available for all Section 8 voucher holders. (In some cases the census tract is unknown or an incorrect census tract was assigned to the voucher holder.) Table 7-8 below and on the next page shows the census tract location of 653 Section 8 voucher holders. As noted by this table, the vast majority of Section 8 assisted families reside in Santa Ana.

Table 7-8
Santa Ana Housing Authority
Section 8 Assisted Families by Census Tract

Census Tract	City	Number of Section 8 Vouchers
740.03	Santa Ana	4
740.04	Santa Ana	10
740.05	Santa Ana	16
740.06	Santa Ana	9
741.02	Santa Ana	9
741.03	Santa Ana	1
741.06	Santa Ana/Unincorporated ¹	19
741.07	Santa Ana	8
741.08	Santa Ana/Unincorporated ¹	6
741.09	Santa Ana	5
741.10	Santa Ana	9
741.11	Santa Ana	1
742.00	Santa Ana	5
744.03	Santa Ana	9
744.05	Santa Ana	4
744.06	Santa Ana	5
744.07	Santa Ana	7
745.01	Santa Ana	1
745.02	Santa Ana	5
746.01	Santa Ana	5
746.02	Santa Ana	11
747.01	Santa Ana	6
747.02	Santa Ana	2
748.01	Santa Ana	10
748.02	Santa Ana	3
748.03	Santa Ana/Unincorporated ¹	11
748.05	Santa Ana	5
748.06	Santa Ana	3
749.01	Santa Ana	4

Table 7-8 - continued
Santa Ana Housing Authority
Section 8 Assisted Families by Census Tract

Census Tract	City	Number of Section 8 Vouchers
749.02	Santa Ana	5
750.02	Santa Ana	8
750.03	Santa Ana	1
750.04	Santa Ana	2
751.00	Santa Ana	5
752.01	Santa Ana	7
752.02	Santa Ana	10
753.01	Santa Ana/Orange ¹	11
753.02	Santa Ana	31
753.03	Santa Ana	2
754.01	Santa Ana	3
754.03	Santa Ana	15
754.04	Santa Ana	9
754.05	Santa Ana	4
755.04	Santa Ana	5
757.01	Santa Ana	9
889.03	Santa Ana/Garden Grove/Westminster ²	8
890.01	Santa Ana/Garden Grove	64
890.04	Santa Ana	27
891.02	Santa Ana/Garden Grove	9
891.04	Santa Ana/Garden Grove	13
891.05	Santa Ana	41
891.07	Santa Ana/Garden Grove	2
992.02	Santa Ana/Fountain Valley	38
992.03	Santa Ana/Fountain Valley/Garden Grove/Westminster	22
992.47	Santa Ana	46
992.48	Santa Ana	40
992.49	Santa Ana	23
Total		653

¹Although this tract is split with Orange, all the population is located within the City of Santa Ana.

²There was no population within the City of Westminster.

Source: Santa Ana Housing Authority

Tabulation by Castañeda & Associates

Table 7-9 on the next page indicates the number of Section 8 voucher holders residing in census tracts with a high percentage (80%+) of minority populations. Only about 28% (184 of 653) of the SAHA voucher holders live in census tracts with a high percentage of minority

populations. Within these census tracts Section 8 assisted housing – for the most part – comprises a small percentage of all the housing units. Consequently, the vast majority (72%) of Section 8 assisted housing is located in census tracts that do not have a high percentage of minority populations.

Table 7-9
Santa Ana Housing Authority
Number of Section 8 Housing Units Located in Census Tracts
With a High Percentage (>80%) of Minority Populations

Census Tract	City	Total Population ¹	Minority Population	Percent Minority	Number of Section 8 Vouchers
749.02	Santa Ana	7,261	7,080	97.51%	5
744.07	Santa Ana	3,822	3,701	96.83%	7
746.02	Santa Ana	9,649	9,222	95.57%	11
747.02	Santa Ana	6,680	6,328	94.73%	2
747.01	Santa Ana	9,075	8,588	94.63%	6
750.03	Santa Ana	8,232	7,773	94.42%	1
748.06	Santa Ana	6,154	5,801	94.26%	3
750.04	Santa Ana	5,779	5,444	94.20%	2
749.01	Santa Ana	10,129	9,533	94.12%	4
748.05	Santa Ana	6,710	6,298	93.86%	5
744.05	Santa Ana	6,965	6,450	92.61%	4
742.00	Santa Ana	9,611	8,899	92.59%	5
744.03	Santa Ana	6,374	5,861	91.95%	9
748.01	Santa Ana	6,267	5,722	91.30%	10
752.01	Santa Ana	5,948	5,426	91.22%	7
740.03	Santa Ana	2,484	2,266	91.22%	4
746.01	Santa Ana	8,861	7,998	90.26%	5
752.02	Santa Ana	6,137	5,519	89.93%	10
750.02	Santa Ana	9,610	8,639	89.90%	8
745.02	Santa Ana	6,280	5,637	89.76%	5
741.03	Santa Ana	5,196	4,646	89.41%	1
744.06	Santa Ana	3,838	3,402	88.64%	5
891.05	Santa Ana	7,081	6,133	86.61%	41
741.09	Santa Ana	4,032	3,486	86.46%	5
745.01	Santa Ana	8,233	7,115	86.42%	1
748.02	Santa Ana	6,041	5,218	86.38%	3
741.08	Santa Ana/Unincorporated ²	5,287	4,515	85.40%	6
741.02	Santa Ana	7,428	5,996	80.72%	9
Total					184

¹2000 population

²Although this tract is split with an unincorporated area of the County, all the population is within the City of Santa Ana

Source: Santa Ana Housing Authority

Tabulation by Castañeda & Associates

3. Anaheim Housing Authority (AHA)

Data are not available from the AHA.

4. Orange County Housing Authority (OCHA)

OCHA administers 8,089 Section 8 Housing Choice Vouchers within the cities participating in the *Regional AI*. Data was available on the census tract location of 6,832 voucher holders. (The census tract location was not available for 989 recipients and another 268 had discrepancies with respect to a census tract number.)

The geographic area covered by the OCHA spans from the City of La Habra in the north down to Dana Point in the south. Of the 6,832 voucher holders, 3,153 reside in census tracts entirely within an entitlement city as shown in Table 7-10 on the next page. With respect to Urban County cities, 762 voucher holders reside in census tracts entirely within these jurisdictions as shown in Table 7-11 on the next page.

Almost 3,000 voucher holders reside in census tracts split between two or more jurisdictions. These shared jurisdictions include entitlement cities with entitlement cities and entitlement cities with urban county cities. Nearly 1,700 of these “shared” locations were with the City of Westminster.

The geographic distribution of all Section 8 voucher holders is as follows:

▪ Entitlement Cities	3,153
▪ Urban County Cities	762
▪ Split Tract Locations	<u>2,917</u>
Total	6,832

Table 7-12 on page 7-26 identifies the number of Section 8 voucher holders residing in census tracts with a high percentage (80%+) of minority populations. Only about 5.3% (363 of 6,832) of the OCHA voucher holders live in census tracts with a high percentage of minority populations. Within these census tracts Section 8 assisted housing – for the most part - comprises a small percentage of all the housing units. Only in census tract 525.18 does Section 8 housing comprise a “high” percentage (67%) of all housing in a census tract. However, the population in the tract is extremely low. Consequently, the vast majority (95%) of Section 8 assisted housing is located in census tracts that do not have a high percentage of minority populations.

An analysis also was completed to determine the number of Section 8 voucher holders residing in census tracts with a low (<20%) minority population. Some 258 (almost 4%) OCHA Section 8 voucher holders reside in 34 low minority population neighborhoods/census tracts. Consequently, the number (258) of voucher holders residing in low minority population neighborhoods is about 100 less than the number (363) living in high minority population census tracts. Table 7-13 on page 7-27 presents the data analysis.

Table 7-10
Orange County Housing Authority
Section 8 Assisted Families by Entitlement City

Entitlement Cities	Number of Section 8 Vouchers
Anaheim	92
Buena Park	117
Fountain Valley	193
Fullerton	251
Garden Grove	156
Huntington Beach	498
Irvine	538
La Habra	108
Lake Forest	169
Newport Beach	110
Orange	447
Rancho Santa Margarita	42
Santa Ana	2
Westminster	430
Total	3,153

Source: Orange County Housing Authority

Table 7-11
Orange County Housing Authority
Section 8 Assisted Families by Urban County City

Urban County	Number of Section 8 Vouchers
Aliso Viejo	13
Brea	129
Cypress	74
Dana Point	37
Laguna Beach	13
Laguna Hills	8
Laguna Woods	1
La Palma	46
Los Alamitos	11
Placentia	121
Seal Beach	3
Stanton	220
Villa Park	0
Yorba Linda	76
Unincorporated	10
Total	762

Source: Orange County Housing Authority

Table 7-12
Orange County Housing Authority
Number of Section 8 Housing Units Located in Census Tracts
With a High Percentage (>80%) of Minority Populations

Census Tract	City	Total Population ¹	Minority Population	Percent Minority	Number of Section 8 Vouchers
525.18	Irvine	3	3	100.00%	2
992.49	Orange	4,443	4,322	97.28%	1
741.02	Santa Ana	7,428	6,904	92.95%	1
891.04	Garden Grove	6,074	5,625	92.61%	13
117.20	Placentia	7,535	6,973	92.54%	17
865.02	Anaheim	6,678	6,168	92.36%	1
874.05	Anaheim	6,649	5,933	89.23%	1
992.48	Santa Ana	5,365	4,757	88.67%	1
890.03	Garden Grove	3,808	3,372	88.55%	9
875.04	Anaheim	8,248	7,210	87.42%	1
878.03	Stanton	6,442	5,580	86.62%	87
874.03	Anaheim	3,735	3,204	85.78%	1
889.03	Garden Grove/Westminster	8,594	7,369	85.75%	21
873.00	Anaheim	10,041	8,539	85.04%	1
1106.06	Buena Park	4,841	4,043	83.52%	41
864.05	Anaheim	6,699	5,549	82.83%	1
116.02	Fullerton	5,762	4,772	82.82%	6
992.02	Fountain Valley	8,117	6,715	82.73%	2
744.08	Orange	5,239	4,323	82.52%	1
879.02	Anaheim/Stanton	5,983	4,911	82.08%	22
889.04	Garden Grove/Westminster	5,809	4,766	82.05%	72
891.06	Garden Grove	3,784	3,095	81.79%	2
891.02	Garden Grove/Orange	6,954	5,672	81.56%	3
12.01	La Habra	5,371	4,380	81.55%	13
889.02	Garden Grove/Westminster	5,136	4,177	81.33%	16
888.01	Garden Grove	8,206	6,659	81.15%	27
Total					363

¹2000 population

Source: Orange County Housing Authority

Tabulation by Castañeda & Associates

Table 7-13
Orange County Housing Authority
Number of Section 8 Housing Units Located in Census Tracts
With a Low Percentage (<20%) of Minority Populations

Census Tract	City	Total Population ¹	Minority Population	Percent Minority	Number of Section 8 Vouchers
994.07	Huntington Beach/Westminster	2,491	492	19.75%	44
992.20	Huntington Beach	5,421	1,067	19.68%	1
993.06	Huntington Beach	5,931	1,164	19.63%	11
632.01	Orange	3,611	701	19.41%	1
320.42	Trabuco Canyon	6,135	1,174	19.14%	1
993.07	Huntington Beach	2,377	437	18.38%	14
993.11	Huntington Beach	3,818	691	18.10%	2
995.12	Seal Beach	2,766	500	18.08%	3
218.09	Yorba Linda	2,616	472	18.04%	6
219.17	Orange	3,366	596	17.71%	4
218.16	Yorba Linda	4,943	853	17.26%	3
1100.08	Los Alamitos/Seal Beach	4,304	740	17.19%	2
626.05	Laguna Beach	3,396	554	16.31%	10
320.13	Ladera Ranch	3,528	569	16.13%	1
993.09	Huntington Beach	3,565	522	14.64%	4
636.03	Newport Beach	6,263	901	14.39%	41
423.38	Dana Point	4,814	667	13.86%	2
630.10	Newport Beach	6,495	863	13.29%	4
995.06	Sunset Beach	1,267	161	12.71%	1
320.52	Ladera Ranch	3,330	422	12.67%	1
626.44	Corona del Mar/Newport Beach	6,558	821	12.52%	9
626.32	Laguna Beach	4,058	503	12.40%	1
992.44	Huntington Beach	3,846	469	12.19%	3
630.07	Newport Beach	5,928	714	12.04%	18
423.23	Dana Point	4,717	549	11.64%	2
635.00	Newport Beach	6,191	711	11.48%	4
630.08	Irvine	868	98	11.29%	2
626.22	Irvine/Laguna Hills/Laguna Woods	4,231	455	10.75%	26
630.04	Newport Beach	5,602	573	10.23%	18
628.00	Newport Beach	4,732	463	9.78%	3
423.05	Laguna Beach	3,782	325	8.59%	1
626.23	Laguna Hills/Laguna Woods	6,435	519	8.07%	11
634.00	Newport Beach	4,995	368	7.37%	3
626.46	Laguna Woods	3,643	249	6.84%	1
Total					258

¹2000 population

Source: Orange County Housing Authority

E. ACTIONS TO BE TAKEN

As explained on page one, the location of affordable housing is central to fulfilling the commitment to AFFH because it determines whether such housing will reduce or perpetuate residential segregation. The data analysis shows that affordable housing is predominantly located outside areas of high minority and high low income population concentrations. Many of the developments were constructed before localities were required to develop policies to guide the location of affordable housing.

During the 2010-2015 period, the FHCOC will take the following actions:

- Provide technical assistance to participating jurisdictions on how the location of affordable housing contributes to AFFH.
- Aggregate - for each census tract - the number of voucher holders assisted by all four housing authorities.
- Conduct an analysis of the location of affordable housing in census tracts with a low concentration of minority and low income populations for purposes of determining whether they offer sufficient affordable housing opportunities.
- Extend the analysis to include census tracts with minority populations in the range of 60 to 80%.
- Suggest policies that the Housing Authorities and/or entitlement cities and the Urban County Program can implement to promote affordable housing opportunities outside of census tracts with high percentages of poverty and minority populations.

Attachment A
Census Tracts With 80%+ Minority Populations

Census Tract	City	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Pop. of two or more races	2000 Total Pop.	Minority	Percent Minority	2008 Total Pop.	Pop. Change 2000-2008
745.01	Santa Ana	82	7,115	5	21	842	13	7	148	8,233	8,151	99.00%	8,547	314
748.06	Santa Ana	80	5,801	161	2	74	14	13	9	6,154	6,074	98.70%	6,395	241
749.02	Santa Ana	102	7,080	15	4	43	2	0	15	7,261	7,159	98.60%	7,539	278
748.01	Santa Ana	107	5,722	244	30	130	20	1	13	6,267	6,160	98.29%	6,448	181
749.01	Santa Ana	185	9,533	50	30	272	22	8	29	10,129	9,944	98.17%	10,520	391
747.01	Santa Ana	198	8,588	72	6	135	34	0	42	9,075	8,877	97.82%	9,419	344
748.05	Santa Ana	156	6,298	76	15	100	27	14	24	6,710	6,554	97.68%	6,966	256
992.49	Santa Ana	121	3,472	26	8	770	21	0	25	4,443	4,322	97.28%	4,612	169
752.01	Santa Ana	162	5,426	71	16	240	1	2	30	5,948	5,786	97.28%	6,206	258
745.02	Santa Ana	178	5,637	7	19	361	32	0	46	6,280	6,102	97.17%	6,527	247
746.02	Santa Ana	284	9,222	27	5	76	14	3	18	9,649	9,365	97.06%	10,008	359
891.05	Santa Ana	232	6,133	18	22	635	11	5	25	7,081	6,849	96.72%	7,144	63
743.00	Santa Ana	147	4,204	5	19	15	3	0	22	4,415	4,268	96.67%	4,584	169
750.03	Santa Ana	299	7,773	49	42	25	0	16	28	8,232	7,933	96.37%	8,531	299
747.02	Santa Ana	270	6,328	9	19	18	15	4	17	6,680	6,410	95.96%	6,953	273
750.04	Santa Ana	247	5,444	29	0	44	4	2	9	5,779	5,532	95.73%	6,018	239
750.02	Santa Ana	426	8,639	86	20	395	2	3	39	9,610	9,184	95.57%	10,145	535
744.03	Santa Ana	298	5,861	18	19	153	4	0	21	6,374	6,076	95.32%	6,617	243
741.09	Santa Ana	200	3,486	13	25	270	15	1	22	4,032	3,832	95.04%	4,198	166
740.03	Santa Ana	125	2,266	25	8	39	4	1	16	2,484	2,359	94.97%	3,462	978
742.00	Santa Ana	504	8,899	23	16	118	16	8	27	9,611	9,107	94.76%	9,976	365
752.02	Santa Ana	322	5,519	98	25	139	0	11	23	6,137	5,815	94.75%	6,366	229
744.05	Santa Ana	371	6,450	32	5	64	3	11	29	6,965	6,594	94.67%	7,429	464
741.08	Santa Ana	313	4,515	40	13	331	37	0	38	5,287	4,974	94.08%	5,496	209
748.02	Santa Ana	375	5,218	163	22	180	22	3	58	6,041	5,666	93.79%	6,278	237
741.02	Santa Ana	524	5,996	110	19	696	30	9	44	7,428	6,904	92.95%	7,709	281

Census Tract	City	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Pop. of two or more races	2000 Total Pop.	Minority	Percent Minority	2008 Total Pop.	Pop. Change 2000-2008
746.01	Santa Ana	626	7,998	29	29	110	23	4	42	8,861	8,235	92.94%	9,208	347
891.04	Santa Ana/Garden Grove	449	4,384	37	10	1,130	19	0	45	6,074	5,625	92.61%	6,293	219
741.03	Santa Ana	385	4,646	13	21	79	21	1	30	5,196	4,811	92.59%	5,394	198
744.07	Santa Ana/Tustin	573	6,765	100	6	161	8	6	68	7,687	7,114	92.55%	8,005	318
117.20	Anaheim/Placentia	562	6,612	93	24	158	11	10	65	7,535	6,973	92.54%	8,008	473
865.02	Anaheim	510	5,995	34	24	77	1	1	36	6,678	6,168	92.36%	6,916	238
748.03	Santa Ana	702	6,623	177	26	1,409	33	4	78	9,052	8,350	92.24%	9,416	364
744.06	Santa Ana	311	3,402	31	14	55	8	1	16	3,838	3,527	91.90%	3,994	156
874.04	Anaheim	323	3,338	34	14	53	9	0	14	3,785	3,462	91.47%	3,926	141
890.01	Santa Ana	794	3,704	54	30	2,835	46	1	110	7,574	6,780	89.52%	7,900	326
874.05	Anaheim	716	5,504	101	20	235	16	4	53	6,649	5,933	89.23%	6,977	328
890.04	Santa Ana	812	4,865	68	5	1,596	34	6	53	7,439	6,627	89.08%	7,823	384
992.47	Santa Ana	380	1,765	24	14	1,176	31	1	27	3,418	3,038	88.88%	3,558	140
992.48	Santa Ana	608	3,297	73	3	1,300	44	1	39	5,365	4,757	88.67%	5,595	230
890.03	Garden Grove	436	2,009	84	4	1,155	37	1	82	3,808	3,372	88.55%	3,973	165
875.04	Anaheim	1,038	6,342	106	35	587	22	0	118	8,248	7,210	87.42%	8,542	294
866.01	Anaheim	1,255	7,746	247	26	455	29	13	101	9,872	8,617	87.29%	10,343	471
878.03	Stanton/Anaheim	862	4,415	135	16	808	89	12	105	6,442	5,580	86.62%	6,671	229
740.05	Santa Ana	1,051	5,238	103	21	1,110	26	20	85	7,654	6,603	86.27%	7,947	293
874.03	Anaheim	531	3,059	21	9	92	2	0	21	3,735	3,204	85.78%	3,861	126
889.03	Garden Grove/Santa Ana	1,225	2,289	45	16	4,776	59	12	172	8,594	7,369	85.75%	9,001	407
873.00	Anaheim	1,502	7,428	216	23	716	16	3	137	10,041	8,539	85.04%	10,933	892
865.01	Anaheim	732	3,843	36	16	79	1	2	39	4,748	4,016	84.58%	4,929	181
1106.06	Buena Park	798	2,805	249	18	860	10	6	95	4,841	4,043	83.52%	5,215	374
864.05	Anaheim	1,150	5,067	100	8	288	10	17	59	6,699	5,549	82.83%	6,961	262
116.02	Fullerton/Anaheim	990	4,460	113	19	123	3	1	53	5,762	4,772	82.82%	5,990	228

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992.02	Santa Ana/Fountain Valley	1,402	4,206	88	54	2,194	49	10	114	8,117	6,715	82.73%	8,402	285
879.02	Stanton	1,072	3,586	81	11	1,019	86	1	127	5,983	4,911	82.08%	6,143	160
889.04	Westminster/Garden Grove	1,043	682	20	3	3,927	26	7	101	5,809	4,766	82.05%	6,072	263
864.04	Anaheim	1,121	4,347	57	24	585	5	6	72	6,217	5,096	81.97%	6,451	234
891.06	Garden Grove	689	2,317	32	7	680	12	3	44	3,784	3,095	81.79%	3,933	149
891.02	Garden Grove/Santa Ana	1,282	4,232	69	23	1,182	57	4	105	6,954	5,672	81.56%	7,234	280
12.01	La Habra/County	991	3,991	59	18	213	3	0	96	5,371	4,380	81.55%	5,586	215
753.02	Santa Ana	852	3,440	86	3	181	6	6	34	4,608	3,756	81.51%	4,782	174
889.02	Garden Grove	959	1,363	34	14	2,601	82	4	79	5,136	4,177	81.33%	5,387	251
888.01	Garden Grove	1,547	1,593	108	17	4,701	53	8	179	8,206	6,659	81.15%	8,633	427
741.11	Santa Ana	1,135	3,579	153	12	938	15	6	84	5,922	4,787	80.83%	6,148	226
117.14	Anaheim	58	227	0	3	9	0	0	5	302	244	80.79%	311	9

Attachment B
Affordable Housing Inventory
Arranged by Census Tract

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
La Habra	Casa Nicolina	1510 W. La Habra Blvd.	90631	11.03	Family	562	22
La Habra	La Habra Inn Senior Apartments	700 N. Beach Blvd.	90631	11.03	Senior SRO 55+	70	70
La Habra	Casa El Centro	101 N. Cypress St.	90631	12.02	Senior/Disabled 62+	55	55
La Habra	Las Lomas Gardens	900 S. Las Lomas Dr.	90631	13.03	Family	112	93
La Habra	Cypress Villa Apartments	900 North Cypress Street	90631	14.01	Non Targeted	72	71
Brea	Vintage Creek Sr. Apartments	855 North Brea Blvd.	92821	15.02	Senior	105	105
Brea	Birch Street Loft Apartments	260 & 330 W. Birch St.	92821	15.03	1 Bedroom Lofts	30	25
Brea	Imperial Terrace Apartments	430 W. Imperial Hwy.	92821	15.03	Family	36	18
Brea	Loft Apartments	215 S. Brea Blvd.	92821	15.03	Artist's Lofts	32	8
Brea	South Walnut Bungalows	302-314 S. Walnut Ave.	92821	15.03	Family	9	9
Brea	Walnut Village Apartments	620 Walnut Ave	92821	15.03	Large Family	46	46
Brea	Birch Terrace Apartments	601 E. Birch St.	92821	15.04	Family	36	18
Brea	BREAL Senior Apartments	111 N. Orange Ave.	92821	15.04	Senior 65+	30	30
Brea	Civic Center Apartments	651 E. Birch St.	92821	15.04	Family	30	16
Brea	Orange Villa Senior Apartments	137 N. Orange Ave.	92821	15.04	Senior 62+	36	9
Brea	Williams Senior Apartments	212 S. Orange Ave.	92821	15.04	Senior 62+	28	28
Brea	Town and Country Apartments	800 S. Brea Blvd.	92821	15.05	Family	122	50
Brea	Brea Woods Senior Apartments	195 W. Central Ave.	92821	15.06	Senior 55+	151	36
Brea	Tamarack Pointe Villas	330 W. Central Ave.	92821	15.07	Family	48	5
Fullerton	North Hills Apartments	570 East Imperial Highway	92835	16.01	Non Targeted	204	203

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Fullerton	Harborview Terrace Apartments	2305 N. Harbor Blvd.	92835	17.06	Physical Disability	25	24
Fullerton	Courtyard Apartments	4127 West Valencia	92633	18.01	Large Family	108	108
Fullerton	Franklin Garden Apartment Homes	3828 Franklin Ave.	92833	18.01	Family	15	11
Fullerton	Fullerton Residential Manor	2441 W. Orangethorpe Ave.	92632	18.02	Senior 62+ (Board & Care)	97	97
Fullerton	Amerige Villa Apartments	343 W. Amerige Ave.	92832	112.00	Senior 62+ or Disabled	101	100
Fullerton	Fullerton City Lights	224 E. Commonwealth Ave.	92832	113.00	1 or 2 person	137	136
Fullerton	Klimpel Manor	229 E Amerige Ave.	92832	113.00	Senior	59	59
Fullerton	Casa Maria Del Rio	2130 E. Chapman Ave.	92831	115.02	Mobility Impaired	24	24
Fullerton	East Fullerton Villas	2140-2190 East Chapman Avenue	92821	115.02	Large Family	27	27
Fullerton	Palm Garden Apartments	400 West Orangethorpe Avenue	92832	116.01	Non Targeted	223	223
Fullerton	Richman Park I	436-442 W. Valencia Dr.	92832	116.01	Family	8	8
Fullerton	Richman Park II	461 West Ave.	92832	116.01	Family	4	4
Fullerton	Truslow Village	220 W. Truslow Ave.	92832	116.01	Family	12	1
Fullerton	Allen Hotel Apartments	410 S. Harbor Blvd.	92832	116.02	Family	16	16
Fullerton	Las Palmas Apartments	2598 N. Associated Rd.	92835	117.07	Family	259	52
Fullerton	Garnet Housing	3012-3024 Garnet Ln. 1512 & 1518 Placentia	92831	117.11	Family	20	20
Fullerton	Garnet Lane Apartments	3125-3149 Garnet Ln.	92631	117.11	Family	18	17
Placentia	Imperial Villas	1050 E. Imperial Hwy.	92870	117.17	Family	58	58
Placentia	Villa La Jolla	734 W. La Jolla Blvd.	92870	117.20	At-Risk	55	54
Placentia	No Name Provided	219 Melrose St.	92870	117.21	Family	2	2
Placentia	No Name Provided	307 Santa Fe Ave.	92870	117.21	Family	2	2

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Placentia	No Name Provided	338 Santa Fe Ave.	92870	117.21	Family	4	4
Placentia	Ramona Gardens	415 & 421 Ramona St.	92670	117.21	Family	6	6
Yorba Linda	Evergreen Villas	5100 Avocado Circle	92886	218.02	Senior 55+	52	25
Yorba Linda	Yorba Linda Family Apartments	18542 Yorba Linda Blvd.	92886	218.02	Large Family	44	43
Yorba Linda	Parkwood Apartments	4075 Prospect Avenue	92885	218.09	Senior	101	100
Placentia	Arbor Lane East	1621 & 1931 Cherry St.	92870	218.21	Family	2	2
Placentia	Highland Orchard Apartments	140 S. Highland Ave.	92870	218.21	Family	104	10
Yorba Linda	Victoria Woods Yorba Linda	5303 Stonehaven Drive	92887	218.25	Senior	124	124
Yorba Linda	Riverbend (Archstone Yorba Linda)	25550 River Bend Dr.	92887	218.26	Family	400	100
Anaheim	Palacio Villas	435 S. Anaheim Hills Rd.	92807	219.05	Senior 62+	117	27
Orange	Villa Modena	4431 E. Marmon Ave.	92869	219.13	Family	5	5
Anaheim	Fountain Glen	225 S. Festival Dr.	92808	219.22	Senior 55+	259	130
Trabuco Canyon	Trabuco Highlands	31872 Joshua Dr.	92679	320.04	Family	184	37
Rancho Santa Margarita	Villa Aliento	114 Aliento St.	92688	320.51	Family	225	23
Ladera Ranch	Laurel Glen	70 Sklar St.	92694	320.52	Family	220	44
Rancho Santa Margarita	Fountain Glen Senior Apartments	30751 El Corazon	92688	320.54	Senior 55+	166	34
Rancho Santa Margarita	Villa La Paz	2 Via Amistosa	92688	320.55	Family	500	100
Dana Point	OC Community Housing Corp.	25942 Domingo	92624	422.01	Family	24	24
Dana Point	Monarch Coast	32400 Crown Valley Pkwy.	92629	423.24	Family	418	84
Irvine	Northwood Affordable Apartments	Jeffrey and Trabuco Road	92620	524.18	Large Family	96	94

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Irvine	Northwood Place	1300 Hayes St.	92620	524.18	Family	604	186
Irvine	Woodbury NE Apartments	North of Talisman, South of Mission Park, East of Pink Sage, West of Hallmark in Planning Area 9A	92620	524.18	Large Family	150	148
Irvine	Woodbury Apts. – Phase I	Sand Canyon/Trabuco	92620	524.18	Family	90	90
Lake Forest	Alexan Bellecour	21041 Osterman Rd.	92630	524.23	Family	131	6
Lake Forest	Arbors	26356 Vintage Woods Rd.	92630	524.23	Family	328	22
Lake Forest	Emerald Court	21141 Canada Rd.	92630	524.23	Family	288	58
Lake Forest	Westridge	26571 Normadale Dr.	92630	524.23	Family & Senior	390	78
Lake Forest	Trabuco Woods	22159 Rimhurst Dr.	92630	524.24	Family	72	15
Lake Forest	Spring Lakes	21641 Canada Rd.	92630	524.25	Family	180	36
Irvine	Woodbridge Manor	27 Lake Road	92604	525.11	Senior	165	164
Irvine	The Inn At Woodbridge	3 Osborne	92714	525.13	Senior	116	116
Irvine	Cedar Creek	5051 Alton Pkwy.	92604	525.14	Family	176	36
Irvine	Woodbridge Oaks	1 Knollglen	92604	525.14	Family	120	120
Irvine	Woodbridge Willows	344 Knollglen	92614	525.14	Family	200	40
Irvine	Santa Alicia Apartments	100 Santorini	92606	525.15	Family	84	82
Irvine	Orchard Park	50 Tarocco	92618	525.17	Large Family	60	60
Irvine	Woodbridge Villas	10 Thunder Run #30	92614	525.19	Family	258	60
Irvine	Cross Creek	22 Creek Rd.	92604	525.20	Family	136	45
Irvine	Woodbridge Cross Creek Apartments	22 Creek Rd., #1	92604	525.20	Family	136	45
Irvine	San Leon Villa Apartments	1 San Leon	92606	525.21	Family	247	72
Irvine	San Marco Apartments	101 Veneto	92614	525.21	Family	426	361
Irvine	San Paulo Apartments	100 Duranzo Aisle	92606	525.21	Family	382	203
Irvine	San Remo Villa	1011 San Remo	92606	525.21	Family	248	76

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Irvine	San Marino Villa Apartments	403 San Marino	92614	525.22	Family	199	59
Irvine	Montecito Vista Apartment Homes	4000 El Camino Real	92602	525.25	Large Family	162	161
Irvine	Northwood Park	146 Roosevelt St.	92620	525.25	Family	168	34
Irvine	The Parklands	1 Monroe, #11	92620	525.25	Family	120	120
Irvine	Windrow Apartments	5300 Trabuco Rd.	92620	525.25	Family	96	96
Irvine	Abilityfirst Apartments	14501 Harvard Ave.	92606	525.27	Disabled	24	24
Irvine	Windwood Glen	97 Hearthstone	92606	525.27	Family	196	40
Irvine	Windwood Knoll	2 Flagstone	92606	525.27	Family	188	60
Irvine	Deerfield Apartments	3 Bear Paw	92604	525.28	Family	288	20
Irvine	Laguna Canyon Apartments	400 Limestone Way	92618	626.04	Large Family	120	118
Laguna Beach	Glenneyre Apartments	450 Glenneyre Street	92651	626.05	Single Room	27	26
Laguna Beach	Hagan Place	383 3rd St.	92651	626.05	1 Bedroom Disabled/HIV	24	24
Laguna Beach	Harbor Cove Apartments	310-312 Broadway St.	92651	626.05	Senior 62+	15	15
Irvine	Mariposa Co-Op	3773 University Dr.	92612	626.10	Disabled/Physically Challenged/Senior	40	39
Irvine	Toscana Apartments	35 Via Lucca	92612	626.10	Family	563	84
Irvine	Villa Sienna	25 Palatine #100	92612	626.10	Family	1442	216
Irvine	Harvard Manor	21 California Ave.	92715	626.14	Senior 62+	50	35
Laguna Hills	Rancho Niguel Apartments	25952 Via Lomas	92653	626.25	Non Targeted	51	51
Irvine	Berkeley Court	307 Berkeley	92612	626.26	Family	118	32
Irvine	Columbia Court	307 Berkeley	92612	626.26	Family	58	12
Irvine	Dartmouth Court	1100 Stanford	92612	626.26	Family	294	89
Irvine	Stanford Court	400 Stanford	92612	626.26	Family	320	96
Irvine	Harvard Court	146 Berkeley	92612	626.27	Family	112	34
Irvine	Harvard Manor	50 Cornell Dr.	92712	626.27	Family	161	100

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Irvine	Turtle Rock Canyon Apartments	100 Stone Cliff Aisle	92612	626.28	Family	217	66
Laguna Beach	Vista Aliso Apartments	21544 Wesley Drive	92651	626.32	Senior	71	70
Aliso Viejo	Wood Canyon Villas	28520 Wood Canyon Dr.	92656	626.39	Family	230	46
Aliso Viejo	Woodpark Apartments	22702 Pacific Park Dr	92656	626.39	Large Family	128	128
Newport Beach (Corona del Mar)	Seaview Lutheran Plaza	2800 Pacific View Dr.	92625	626.44	Senior 62+ & Mobility Impaired	100	99
Newport Beach	Bayview Landing	1121 Back Bay Drive	92660	630.04	Senior	120	119
Newport Beach	Newport North	2 Milano Dr.	92660	630.07	Family	570	133
Newport Beach (SA Heights)	Lange Drive Family	1621 Mesa Drive	92707	631.01	Large Family	74	74
Newport Beach	Newport Seacrest Apartments	843 W. 15th St.	92663	636.03	Family	65	65
Newport Beach	Newport Seaside Apts.	1544 Placentia Avenue	-0-	636.03	Large Family	26	26
Santa Ana	La Gema Del Barrio	638-642 East Adams	92707	740.03	Large Family	6	6
Santa Ana	Warwick Square Apartments	780 South Lyon Street	92705	744.03	Large Family	500	500
Santa Ana	901 E. 6th St.	901 E. 6th St.		744.05	Family	24	24
Santa Ana	Wakeham Grant Apartments	816 Minnie Street	92701	745.01	Non Targeted	127	126
Santa Ana	Cornerstone Village	923-1117 S. Minnie		745.01	Family	200	200
Santa Ana	415-417 Birch	415-417 Birch St.	92701	746.01	Family	3	3
Santa Ana	Raitt Street Apartments	201, 271 North Raitt Street	92703	748.01	Large Family	6	2
Santa Ana	Santa Ana Civic Center	405 & 411 S. Raitt St.	92703	748.01	Family	12	6
Santa Ana	Santa Ana Civic Center	2009 W. Myrtle St.	92703	748.02	Family	6	6
Santa Ana	Sullivan Manor	2516 W. 1st St.	92703	748.02	Family	54	54
Santa Ana	Villa Del Sol Apartments	811 S. Fairview St.	92704	748.05	Family	562	112
Santa Ana	1060 W. Third	1060 W. Third St.	92701	749.01	Family/Senior	6	6
Santa Ana	Flower Park Plaza	901 West First Street	92703	749.01	Senior	199	198
Santa Ana	Highland Manor Apartments	1128 W. Highland St.	92703	749.02	Family	12	12
Santa Ana	Heninger Village Apartments	200 S. Sycamore Street	92701	750.02	Senior	58	58

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Santa Ana	Santa Ana Towers	401 W. First Street	92701	750.02	Senior	199	198
Santa Ana	Rosswood Villas	100 N. Ross		750.02	Senior	199	198
Santa Ana	Garden Court	300 E. Santa Ana Bl.		750.02	Family	84	42
Santa Ana	Ross & Durant Apartments	1411 N. Durant Street & 1501 N. Ross Street	92706	750.03	Large Family	49	48
Santa Ana	1025 N. Spurgeon	1025 N. Spurgeon St.	92701	750.04	Family	4	4
Santa Ana	Wycliffe Plaza	1401 N. Flower St.	92706	751.00	Senior 62+/Disabled	199	140
Santa Ana	City Gardens Apartments	2901 N Bristol St	92706	753.01	Non Targeted	274	55
Santa Ana	Santiago Villas	939 E. 17th St.		754.01	Senior	89	89
Irvine	Alta Court Apartments	2552 Kelvin Ave.	92614	755.15	Family	132	27
Irvine	Granite Court	17421 Murphy Ave.	92612	755.15	Family	71	71
Irvine	Irvine Inn	2810 Warner Avenue	92606	755.15	Single Room	192	192
Irvine	The Camden Apts.	2801 Main St.	92614	755.15	Family	290	58
Orange	Stonegate Senior Apartments	170 N. Prospect Street	92869	758.04	Senior	20	19
Orange	Rose Avenue Apartments	1743 E. Rose Ave.	92867	758.05	Family	6	6
Orange	Casas Del Rio	1740 E. La Veta Ave.	92866	758.06	Disabled Only	40	40
Orange	Chestnut Place	1745 E. Fairway Dr.	92866	758.06	Senior 62+	50	49
Orange	Harmony Creek Sr. Apartments	1616 E. Rock Creek Dr.	92866	758.06	Senior 62+	83	82
Orange	Esplanade St. Apartments	280 S. Esplanade St.	92869	758.07	Family	27	27
Orange	Adams Triplexes	1741-1745, 1837-1841, & 1915-1919 E. Adams Ave.	92867	758.12	Family	9	9
Orange	Orange Garden Apartments (see Plaza Garden)	928 N. Highland St., #2	92867	758.12	Family	24	24

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Orange	Plaza Garden Apartments	928 N. Highland St., #2	92867	758.12	Family	56	56
Orange	Wilson Avenue Apartment I	1924 & 1934 E. Wilson Ave.	92867	758.12	Family	20	20
Orange	Wilson Avenue Apartments II	1844 E. Wilson Ave.	92867	758.12	Family	10	10
Orange	Wilson Avenue Apartments III	1944 E. Wilson Ave.	92867	758.12	Family	10	10
Orange	The Knolls Apartments	206 Prospect Avenue	92669	758.16	Non Targeted	260	260
Orange	Casa Ramon Apartments	840 West Walnut Avenue	92868	759.01	Large Family	75	74
Orange	Friendly Center	451-453 N. Lemon St.	92866	759.01	Family	8	8
Orange	Parker Street Apartments	161 N. Parker St.	92868	759.01	Family	3	3
Orange	OHDC/Orange Rotary Senior Plaza	235 W. La Veta Avenue	92866	759.02	Senior	6	6
Orange	Triangle Terrace	555 S. Shaffer St.	92866	759.02	Senior 62+	75	75
Orange	Pixley Arms	537 W. Almond Ave.	92868	760.00	Senior 62+	15	15
Orange	Citrus Village	501 N. Citrus St.	92868	761.01	Family	47	22
Orange	Community Garden Tower East	3919 W. Garden Grove Blvd.	92868	761.02	Senior 62+	333	332
Garden Grove	Arroyo Vista	12242 Haster St.	92840	761.03	Family	148	10
Garden Grove	Crystal View Apartments	12091 Bayport St.	92840	761.03	Family	402	80
Orange	Hoover Avenue	108-118, 218-228 W. Hoover Ave.	92867	762.04	Family	40	40
Orange	Orangevale Apartments	1300 North Shaffer Avenue	92867	762.05	Non Targeted	64	64
Orange	Orchid Gardens	1051 N. Glassell St.	92867	762.05	Senior 62+	33	17
Orange	Walnut-Pixley	1519 E Walnut and 537 W Almond Ave	92867	762.06	Large Family	22	22
Anaheim	Broadway Village	1245 E. Broadway	92805	863.01	Large Family	46	45

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Anaheim	Tyrol Plaza Senior Apartments	891 S. State College Blvd.	92806	863.01	Senior	60	59
Anaheim	Carbon Creek Shores	3060 E. Frontera St.	92806	864.07	Families, Mobility & Sensory Impaired	40	40
Anaheim	Park Vista Apartments	1200 N. Robin Street	92801	866.01	Family	392	390
Anaheim	Paseo Village	1115 N. Citron Ln.	92801	866.01	Family	176	174
Anaheim	Casa Delia	1105 N. Citron St.	92801	866.01	Family	12	12
Anaheim	Sage Park Apts.	810 N. Loara	92801	866.02	Senior 62+	100	25
Anaheim	Villa Catalpa Apts.	1680 Catalpa	92801	866.02	Senior 62+	18	6
Anaheim	Fairhaven Apts.	535 Fairhaven	92801	867.02	Senior 62+	17	6
Anaheim	Monarch Pointe Apartment Homes	1830 W. Crescent Avenue (Crescent and Chippewa Avenue at the I-5 Freeway)	92801	867.02	Large Family	63	62
Anaheim	Sea Wind Apartments	1924 Glenoaks & 1925 Greenleaf Avenue	92801	867.02	Non Targeted	91	18
Anaheim	Greenleaf Family Apartments	2048 Greenleaf		867.02	Family	53	53
Buena Park	Dorado Senior Apartments	8622 Stanton Ave.	90620	868.03	Senior 55+	150	150
Anaheim	Miracle Terrace	225 S. Western Ave.	92804	869.01	Senior 62+	179	177
Anaheim	Palm West Apartments	644 South Knott Avenue	92804	869.01	Non Targeted	58	23
Anaheim	Renaissance Park Apartments	3433 West Del Monte	92804	869.01	Non Targeted	127	51
Anaheim	Westchester Apartments	125 S. Westchester Dr.	92804	869.01	Family	65	64
Anaheim	Newporter Apts.	3424 W. Orange		869.01	Family	22	4
Anaheim	Cobblestone Apartments	870 South Beach Blvd.	92804	869.03	Non Targeted	64	13
Anaheim	Casa Alegre	2761 West Ball Road	92804	870.01	Disabled Persons – AIDS/HIV	23	22
Anaheim	Magnolia Acres	640 S. Magnolia Avenue	92807	870.01	Senior	40	10

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Anaheim	Harbor Village	2736 W. Lincoln		870.01	Family	111	9
Anaheim	Sunset Plaza Apartments	2771 W. Ball Rd.		870.01	Family	106	9
Anaheim	Gilbert Park Apts.	925 S. Gilbert	92804	870.02	Senior 62+	24	8
Anaheim	California Villas	935 S. Gilbert Street	92804	870.02	Senior	34	33
Anaheim	Linbrook Court	2240 W. Lincoln Avenue	92801	871.01	Senior	81	80
Anaheim	Bel-Age Manor	1660 W. Broadway	92802	871.05	Senior 55+	180	179
Anaheim	Acaciawood Village	1415 W. Ball Rd.	92802	871.06	Seniors 62+	123	31
Anaheim	Heritage Village Apts.	707 W. Santa Ana St.	92805	872.00	Senior 62+	196	49
Anaheim	Vintage Apartments	200 S. Citron		872.00	Senior 55+	82	21
Anaheim	Diamond Asile	1232 Diamond St.		872.00	Special Needs	26	25
Anaheim	Anaheim Family Housing	415 South Vine Street	92805	873.00	Large Family	60	59
Anaheim	Anaheim Memorial Manor	275 E. Center St.	92805	873.00	Senior 62+	75	75
Anaheim	Elm Street Commons	111-125 West Elm Street	92805	873.00	Large Family	52	51
Anaheim	Village Center Apartments	200 E. Lincoln Ave.	92805	873.00	Senior 62+	100	100
Anaheim	Hermosa Village Apartments	1515 S. Calle Del Mar Dr.	92802	875.01	Large Families	517	517
Anaheim	Nutwood Park Apartments	1668 S. Nutwood St.	92802	876.02	Family	30	2
Anaheim	Cornerstone Apartments	9541 W. Ball Road	92804	877.01	Family	49	48
Anaheim	New Horizons Apts.	835 S. Brookhurst	92804	877.01	Senior 62+	80	32
Anaheim	Heritage Park Apartments	950 S. Gilbert		877.01	Senior 60+	94	29
Stanton	Casa de Esperanza	10572 Knott Ave.	90680	878.01	Special Needs	10	9
Stanton	Continental Gardens Apartments	8101 Cerritos Avenue	90680	878.03	Non Targeted	298	298
Anaheim	Pebble Cove Apartments	2555 W. Winston Rd.	95242	878.06	Family	112	45
Garden Grove	Malabar Apartments	9777 Bixby Avenue	92841	882.03	Large Family	126	126
Garden Grove	Aslam	11211 Steele St.	92840	883.01	Family	10	10
Garden Grove	Pat Stein-Palma Vista	10772-10862 Palma Vista		883.01		24	24

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Garden Grove	Tamerlane	12131,12141,12161,12171 Tamerlane; 12112,12222,12132,12182 Tamerlane		884.02		43	28
Anaheim	Harborcliffe	2170 S. Harbor Bl.		884.03	Family	130	26
Garden Grove	Briar Crest and Rose Crest	Briar: 11701 Stewart St. Rose: 11762 Stewart St.	92843	885.01		Briar - 32 Rose - 10	42
Garden Grove	Stuart Drive Apartments	11632 Stuart Dr. #3	92843	885.01	Family	95	95
Garden Grove	Arbor Glen Apartments	12680 Buaro St.	92840	885.02	Family	136	68
Garden Grove	Garden Grove Senior Apartments	12739 Garden Grove Blvd.	92843	885.02	Senior	85	85
Garden Grove	Sungrove Senior Apartments	12811 Garden Grove Blvd.	92843	885.02	Senior	82	82
Garden Grove	Acacia Villa Apartments	10931 Acacia Pkwy.	92840	886.01	Senior 62+	161	161
Garden Grove	Jordan Manor	11441 Acacia Pkwy.	92840	886.02	Senior 62+	64	64
Garden Grove	Rose Garden Apartment	8551 Westminster Ave.	92844	889.01	Family	144	144
Garden Grove	Orange Tree Apartments	13902 Taft		889.02		80	80
Santa Ana	Harbor Pointe Apartments	1500 N. Harbor Blvd.	92703	890.04	Family	130	26
Santa Ana	Vintage Wood Apartments	3900 W. 5th St.	92703	890.04	Family	170	34
Garden Grove	Tudor Grove	12631 Sunswep Avenue #1	92843	891.04		144	144
Garden Grove	Thomas House	12591-12601 Morningside		891.04		16	14
Garden Grove	La Esperanza I and II	14024,14021,14041,14061 Buena St.		891.04		28	28
Garden Grove	OCCHC/Emergency Shelter for the Homeless	12602 Keel St.		891.04		8	8
Santa Ana	Jackson Park	300-304 N. Jackson St.	92701	891.05	Family	7	4
Santa Ana	Santa Ana Civic Center	3524 W. Washington Ave.	92703	891.05	Family	8	8

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Anaheim	CHOC Site	Lincoln Ave./East St.		894.05	Family	150	150
Stanton	Park Stanton Senior Apartments (Formerly Park Place Apartments)	7622 Katella Ave.	90680	897.01	Senior 55+	335	334
Stanton	Plaza Court	11380-11480 Court Street	90680	897.01	Large Family	103	103
Orange	Alice Clark Orange Blossom Sr. Apartments	141 E. Walnut Ave.	92866	962.05	Senior 62+	4	4
Garden Grove	Garden Grove Manor	10642 Bolsa Ave.	92843	992.03	Family	78	31
Westminster	Summerville at Brookhurst	15302 Brookhurst St.	92683	992.04	Senior 62+	117	24
Huntington Beach	Huntington Breakers	21270 Beach Blvd.	92648	992.20	Family/Senior/Disabled	342	68
Fountain Valley	Club 42	17230 Newhope	92708	992.29	Family	7	7
Fountain Valley	Guadalupe Manor	17103 Magnolia St.	92708	992.33	Senior 62+ & Mobility Impaired	71	69
Fountain Valley	Fountain Valley Senior (The Jasmine)	17911 Bushard Street	92708	992.34	Senior	156	154
Huntington Beach	Beachview Villa	8102 Ellis Avenue	92648	992.35	Single Room	107	86
Huntington Beach	Huntington Villa Yorba	16000 Villa Yorba	92647	992.41	Family	198	192
Huntington Beach	Sea Air Apartments	725, 729 & 733 Utica Ave.	92648	993.05	Family	36	36
Huntington Beach	Bowen Court	1970, 1974, 1978, 1982 & 1990 Lake Street	92648	993.05	Senior	20	20
Huntington Beach	Fountain Glen @ Seacliff	7200 Garden Glen Dr (North of Main & Yorktown)	92648	993.09	Senior 55+	271	80
Huntington Beach	Main Place Apartments	7311 Luna (N/W corner Clay/Gothard/Main)	92648	993.09	Family	26	26
Huntington Beach	Oceanaire Garden Apartments	7811 Talbert Ave.	92648	994.02	Family	65	65
Huntington Beach	Shelter For the Homeless	7802 Barton Dr. 7812 Barton Dr.	92647	994.02	Family	8	8

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Huntington Beach	Shelter for the Homeless (Keelson)	17382 Keelson Ln.	92647	994.02	Family	4	4
Huntington Beach	Huntington Village Senior Apartments	16171 Springdale St.	92649	994.07	Senior 62+	114	11
Huntington Beach	Sher Lane Apartments	16112 Sher Ln.	92647	994.10	Family/Senior	66	66
Huntington Beach	Bridges Apartments	16851 Nichols St.	92647	994.11	Family	80	80
Huntington Beach	5 Points Senior Apartments	18561 Florida St.	92648	994.13	Senior 55+	166	50
Huntington Beach	Emerald Cove	18191 Parktree Cir.	92648	994.13	Senior 60+	164	164
Huntington Beach	Wycliffe Gardens	18765 Florida St.	92648	994.13	Senior 62+ & disabled	185	185
Huntington Beach	Huntington Pointe (Quo Vadis Apartments)	18992 Florida Street	92648	994.13	Non Targeted	104	102
Huntington Beach	Hermosa Vista Apartments	15353 & 15425 Goldenwest Street	92647	996.05	Non Targeted	88	87
Midway City	Jackson Aisle Apartments	15432 Jackson Street	92655	997.02	Special Needs	30	29
Midway City	Pacific Terrace Apartments	15000 Pacific St.	92655	997.02	Seniors 62+	97	97
Westminster	Cambridge Heights Senior Apartments	7541 Wyoming Street	92683-3922	998.02	Senior	22	21
Westminster	Coventry Heights	7521 Wyoming Street	92683	998.02	Senior	76	75
Westminster	Westminster Senior Apartments	7632 21st Street	92683	998.02	Senior	92	91
Westminster	The Rose Gardens*	8190 13th Street	92683	998.03	Large Family or Senior?	132	132
Westminster	Windsor Court & Stratford Place	8140 - 8156 13th Street	92683	998.03	Large Family	86	85
Garden Grove	Valley View Senior Villas	12200 Valley View St.	92845	1100.03	Senior 55+	36	36
Cypress	Cypress Park Senior Community	9021 Grindlay St.	90630	1101.04	Active Senior 55+	124	31
Cypress	Cypress Pointe Senior Community	5120 Lincoln Ave.	90630	1101.04	Senior 55+	110	11

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Cypress	Cypress Sunrise Apartments	9151 Grindlay Street	90630	1101.04	Senior	75	74
Cypress	Tara Village Apartments	5201 Lincoln Avenue	90630	1101.04	Large Family	170	168
Cypress	OC Community Housing Corp.	8702 & 8692 LaSalle	90630	1101.11	Family	8	8
Cypress	Sumner Place	8542-8552 Sumner Pl.	90630	1101.11	Family	5	5
Los Alamitos	Laurel Park Manor	4121 Katella Ave.	90720	1101.13	Senior 62+ and Mobility Impaired	71	70
La Palma	Seasons La Palma	7051-7061 Walker St.	90623	1101.15	Senior 62+	60	60
La Palma	Camden Place Apartments	4500 Montecito Drive	90623	1101.16	Senior	35	35
La Palma	Casa La Palma Apartments	7799 Valley View Street	90623	1101.16	Non Targeted	269	269
Anaheim	Solara Court	3335 West Lincoln Avenue	92801	1102.01	Senior	132	132
Anaheim	Villa Anaheim	3305 W. Lincoln Avenue	92626	1102.01	Senior	135	47
Buena Park	Emerald Garden Apartments	8720 Valley View St.	90620	1102.01	Family	110	109
Buena Park	Casa Santa Maria	7551 Orangethorpe Ave.	90621	1105.00	Senior 62+	100	98
Buena Park	Harmony Park Apartments	7252 Melrose St.	90622	1105.00	Senior 62+	59	58
Buena Park	OC Community Housing Corp. (Palm Village)	7602-7638 W. 9th St.	90621	1105.00	Family	38	38
Buena Park	Walden Glen Apartments	6570-6680 Knott Avenue	90621	1105.00	Non Targeted	186	185
Anaheim	OC Community Housing Corp.	Various Locations	92801 ,92802, 92804		Family	17	17
Garden Grove	OC Community Housing Corp.	Various Locations	92843		Family	44	44
Huntington Beach	OC Community Housing Corp.	Various Location	92647, 92648		Family	64	64
Irvine	OC Community Housing Corp.	Various locations	92604, 92618, 92620		Family	6	6

City	Name	Address	Zip Code	Census Tract	Housing Type	Total Units	Low Income Units
Orange	Lemon Street Apartments	481-491 Lemon Street	92866		Family	6	6
Placentia	OC Community Housing Corp.	Various Locations	92870		Family	14	14
Santa Ana	OC Community Housing Corp.	Various Locations	92703, 92704 92707		Family	10	10
Santa Ana	Orange Housing Development Corp.	Various Locations	92701		Family	352	313
TOTAL						34,834	20,379

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TECHNICAL APPENDICES

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Technical Appendix A

Orange County Fair Housing Community Profile

Table A-1
Regional Analysis of Fair Housing Impediments
Entitlement Cities: Year 2010 Population Estimates by City

City	Total Population	Household Population	Group Quarters	Persons Per Household
Anaheim	353,643	349,847	3,796	3.485
Buena Park	84,141	83,207	934	3.465
Fountain Valley	58,741	58,229	512	3.130
Fullerton	138,610	135,395	3,215	2.945
Garden Grove	175,618	173,384	2,234	3.714
Huntington Beach	203,484	202,692	792	2.667
Irvine	217,686	209,482	8,204	2.708
La Habra	63,184	62,589	595	3.215
Lake Forest	78,720	77,876	844	3.029
Newport Beach	86,738	85,798	940	2.212
Orange	142,708	137,240	5,468	3.148
Rancho Santa Margarita	49,945	49,931	14	3.022
Santa Ana	357,754	352,107	5,647	4.737
Westminster	94,294	93,742	552	3.462
Total	2,105,266	2,071,519	33,747	3.265

Source: State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2010

Table construction by Castañeda & Associates

Table A-2
Regional Analysis of Fair Housing Impediments
Urban County: Year 2010 Population Estimates by City

City	Total Population	Household Population	Group Quarters	Persons Per Household
Aliso Viejo	46,123	45,963	160	2.596
Brea	40,377	40,249	128	2.813
Cypress	49,981	49,660	321	3.054
Dana Point	37,326	37,084	242	2.517
Laguna Beach	25,354	25,232	122	2.140
Laguna Hills	33,593	33,169	424	3.069
Laguna Woods	18,747	18,673	74	1.469
La Palma	16,304	16,273	31	3.223
Los Alamitos	12,270	11,864	406	2.735
Placentia	52,305	52,002	303	3.199
Seal Beach	26,010	25,752	258	1.928
Stanton	39,799	39,281	518	3.575
Villa Park	6,307	6,286	21	3.199
Yorba Linda	69,273	69,138	135	3.179
Unincorporated	120,088	118,621	1,467	3.178
Total	593,857	589,247	4,610	2.815

Source: State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2009

Table construction by Castañeda & Associates

Table A-3
Regional Analysis of Fair Housing Impediments
Entitlement Cities: Population Growth
April 1, 1990, April 1, 2000 and January 1, 2010

City	1990	2000	2010	Numerical Change 1990-2000	Percentage Change 1990-2000	Numerical Change 2000-2010	Percentage Change 2000-2010
Anaheim	266,406	328,014	353,643	61,608	23.1%	25,629	7.8%
Buena Park	68,784	77,962	84,141	9,178	13.3%	6,179	7.9%
Fountain Valley	53,691	54,978	58,741	1,287	2.4%	3,763	6.8%
Fullerton	114,144	126,003	138,610	11,859	10.4%	12,607	10.0%
Garden Grove	142,965	165,196	175,618	22,231	15.5%	10,422	6.3%
Huntington Beach	181,519	189,627	203,484	8,108	4.5%	13,857	7.3%
Irvine	110,330	143,072	217,686	32,742	29.7%	74,614	52.2%
La Habra	51,266	58,974	63,184	7,708	15.0%	4,210	7.1%
Lake Forest	NA	58,707	78,720	NA	NA	20,013	34.1%
Newport Beach	66,643	70,032	86,738	3,389	5.1%	16,706	23.9%
Orange	110,658	128,868	142,708	18,210	16.5%	13,840	10.7%
Rancho Santa Margarita*	11,390	47,214	49,945	35,824	314.5%	2,731	5.8%
Santa Ana	293,827	337,977	357,754	44,150	15.0%	19,777	5.9%
Westminster	78,293	88,207	94,294	9,914	12.7%	6,087	6.9%
Total	NA	1,874,831	2,105,266	NA	NA	230,435	12.3%

¹Lake Forest was unincorporated in 1990

²Rancho Santa Margarita was a Census Division Place (CDP) and not an incorporated city in 1990

Source: 1990 Census Summary Tape File 1 (STF1) Table P001 Persons

State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2000

State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2010

Table construction by Castañeda & Associates

Table A-4
Regional Analysis of Fair Housing Impediments
Urban County: Population Growth
April 1, 1990, April 1, 2000 and January 1, 2010

Cities	1990	2000	2010	Numerical Change 1990-2000	Percentage Change 1990-2000	Numerical Change 2000-2010	Percentage Change 2000-2010
Aliso Viejo*	NA	NA	46,123	NA	NA	NA	NA
Brea	32,873	35,410	40,377	2,537	7.7%	4,967	14.0%
Cypress	42,655	46,549	49,981	3,894	9.1%	3,432	7.4%
Dana Point	31,896	35,110	37,326	3,214	10.1%	2,216	6.3%
Laguna Beach	23,170	23,727	25,354	557	2.4%	1,627	6.9%
Laguna Hills*	NA	29,891	33,593	NA	NA	3,702	12.4%
Laguna Woods*	NA	17,794	18,747	NA	NA	953	5.4%
La Palma	15,392	15,408	16,304	16	0.1%	896	5.8%
Los Alamitos	11,788	11,536	12,270	-252	-2.1%	734	6.4%
Placentia	41,259	46,488	52,305	5,229	12.7%	5,817	12.5%
Seal Beach	25,098	24,157	26,010	-941	-3.7%	1,853	7.7%
Stanton	30,491	37,403	39,799	6,912	22.7%	2,396	6.4%
Villa Park	6,299	5,952	6,307	-347	-5.5%	355	6.0%
Yorba Linda	52,422	58,918	69,273	6,496	12.4%	10,355	17.6%
Unincorporated	226,927	168,132	120,088	-58,795	-25.9%	-48,044	-28.6%
Total	NA	556,475	593,857	NA	NA	NA	NA

*Denotes that the city was not incorporated in 1990

Source: 1990 Census Summary Tape File 1 (STF1) Table P001 Persons

State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2000

State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2010

Table construction by Castañeda & Associates

Table A-5
Regional Analysis of Fair Housing Impediments
Entitlement Cities: Year 2010 Housing Supply Estimate by City

City	Single Detached	Single Attached	2 to 4 Units	5 Plus Units	Mobile Homes	Total	Percent Vacant
Anaheim	43,733	9,064	10,436	35,624	4,385	103,242	2.76
Buena Park	14,351	2,024	1,462	6,395	291	24,523	2.07
Fountain Valley	12,486	2,247	672	3,122	398	18,925	1.69
Fullerton	23,958	4,101	3,711	14,518	921	47,209	2.60
Garden Grove	26,811	4,538	3,426	11,014	1,828	47,617	1.95
Huntington Beach	38,619	9,467	9,909	16,924	3,141	78,060	2.65
Irvine	28,138	14,605	5,091	32,155	1,022	81,011	4.52
La Habra	10,619	1,750	1,362	5,508	734	19,973	2.54
Lake Forest	14,165	3,923	1,276	5,734	1,286	26,384	2.55
Newport Beach	19,467	7,166	5,599	10,420	863	43,515	10.87
Orange	25,254	5,374	4,726	7,934	1,339	44,627	2.32
Rancho Santa Margarita	9,117	3,883	598	3,194	0	16,792	1.59
Santa Ana	33,746	7,223	7,473	23,592	3,909	75,943	2.13
Westminster	14,932	2,550	2,106	4,972	3,068	27,628	1.98
Total	315,396	77,915	57,847	181,106	23,185	655,449	3.19

Source: State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2010

Table construction by Castañeda & Associates

Table A-6
Regional Analysis of Fair Housing Impediments
Urban County: Year 2010 Housing Supply Estimate by City

City	Single Detached	Single Attached	2 to 4 Units	5 Plus Units	Mobile Homes	Total	Percent Vacant
Aliso Viejo	6,549	4,991	753	5,899	15	18,207	2.76
Brea	8,510	1,095	569	3,548	869	14,591	1.93
Cypress	10,195	2,717	529	2,842	364	16,647	2.34
Dana Point	7,958	2,273	2,831	2,622	299	15,983	7.80
Laguna Beach	8,336	762	1,760	2,100	324	13,282	11.23
Laguna Hills	5,873	2,183	608	2,272	217	11,153	3.10
Laguna Woods	727	4,146	2,474	6,390	26	13,763	7.61
La Palma	3,643	376	102	989	27	5,137	1.71
Los Alamitos	1,940	269	1,061	1,023	129	4,422	1.90
Placentia	9,798	2,113	1,117	2,954	587	16,569	1.89
Seal Beach	4,711	2,121	1,160	6,390	164	14,546	8.17
Stanton	3,062	1,915	988	4,009	1,262	11,236	2.22
Villa Park	1,994	18	0	6	5	2,023	2.87
Yorba Linda	17,399	2,395	662	1,336	311	22,103	1.62
Unincorporated	30,529	2,188	2,213	3,260	306	38,496	3.04
Total	121,224	29,562	16,827	45,640	4,905	218,158	3.97

Source: State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2010

Table construction by Castañeda & Associates

Table A-7
Regional Analysis of Fair Housing Impediments
Entitlement Cities: Housing Supply Growth
April 1, 1990, April 1, 2000 and January 1, 2010

City	1990	2000	2010	Numerical Change 1990-2000	Percentage Change 1990-2000	Numerical Change 2000-2010	Percentage Change 2000-2010
Anaheim	93,177	99,719	103,242	6,542	7.0%	3,523	3.4%
Buena Park	23,200	23,690	24,523	490	2.1%	833	3.4%
Fountain Valley	18,019	18,473	18,925	454	2.5%	452	2.4%
Fullerton	42,956	44,771	47,209	1,815	4.2%	2,438	5.2%
Garden Grove	45,957	46,703	47,617	746	1.6%	914	1.9%
Huntington Beach	72,736	75,679	78,060	2,943	4.0%	2,381	3.1%
Irvine	42,221	53,711	81,011	11,490	27.2%	27,300	33.7%
Lake Forest ¹	NA	20,486	26,384	NA	NA	5,898	22.4%
La Habra	18,670	19,441	19,973	771	4.1%	532	2.7%
Newport Beach	34,861	37,288	43,515	2,427	7.0%	6,227	14.3%
Orange	38,018	41,920	44,627	3,902	10.3%	2,707	6.1%
Rancho Santa Margarita ²	4,951	16,515	16,792	11,564	233.6%	277	1.6%
Santa Ana	75,000	74,588	75,943	-412	-0.5%	1,355	1.8%
Westminster	25,892	26,940	27,628	1,048	4.0%	688	2.5%
Total	NA	599,924	655,449	NA	NA	55,525	8.5%

¹Lake Forest was unincorporated in 1990

²Rancho Santa Margarita was a Census Division Place (CDP) and not an incorporated city in 1990

Source: 1990 Census Summary Tape File 1 (STF1) Table H001 Housing Units

State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2000

State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2010

Table construction by Castañeda & Associates

Table A-8
Regional Analysis of Fair Housing Impediments
Urban County: Housing Supply Growth
April 1, 1990, April 1, 2000 and January 1, 2010

City	1990	2000	2010	Numerical Change 1990-2000	Percentage Change 1990-2000	Numerical Change 2000-2010	Percentage Change 2000-2010
Aliso Viejo*	NA	NA	18,207	NA	NA	NA	NA
Brea	12,648	13,327	14,591	679	5.4%	1,264	8.7%
Cypress	14,715	16,164	16,647	1,449	9.8%	483	2.9%
Dana Point	14,666	15,682	15,983	1,016	6.9%	301	1.9%
Laguna Beach	12,846	12,965	13,282	119	0.9%	317	2.4%
Laguna Hills*	NA	10,324	11,153	NA	NA	829	7.4%
Laguna Woods*	NA	13,629	13,763	NA	NA	134	1.0%
La Palma	4,935	5,066	5,137	131	2.7%	71	1.4%
Los Alamitos	4,312	4,329	4,422	17	0.4%	93	2.1%
Placentia	13,733	15,326	16,569	1,593	11.6%	1,243	7.5%
Seal Beach	14,407	14,267	14,546	-140	-1.0%	279	1.9%
Stanton	10,755	11,011	11,236	256	2.4%	225	2.0%
Villa Park	1,966	1,992	2,023	26	1.3%	31	1.5%
Yorba Linda	17,341	19,567	22,103	2,226	12.8%	2,536	11.5%
Unincorporated	89,440	61,161	38,496	-28,279	-31.6%	-22,665	-58.9%
Total	NA	NA	218,158	NA	NA	NA	NA

*Denotes that the city was not incorporated in 1990

Source: 1990 Census Summary Tape File 1 (STF1) Table H001 Housing Units

State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2000

State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2010

Table construction by Castañeda & Associates

Table A-9
Regional Analysis of Fair Housing Impediments
Population by Race and Hispanic or Latino
Growth Trends 2000-2008 for Entitlement Cities

City	Year/Change	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Total
Anaheim	Number 2000	117,607	153,374	7,939	1,049	38,919	1,263	457	7,406	328,014
	Percent 2000	35.9%	46.8%	2.4%	0.3%	11.9%	0.4%	0.1%	2.3%	100.0%
	Number 2008	97,373	187,122	10,049	693	46,087	1,040	347	3,812	346,522
	Percent 2008	28.1%	54.0%	2.9%	0.2%	13.3%	0.3%	0.1%	1.1%	100.0%
	# Change	-20,234	33,748	2,110	-356	7,168	-223	-110	-3,594	18,508
	% Change	-17.2%	22.0%	26.6%	-33.9%	18.4%	-17.7%	-24.2%	-48.5%	5.6%
Buena Park	Number 2000	29,885	26,221	2,826	315	16,338	358	154	2,185	78,282
	Percent 2000	38.2%	33.5%	3.6%	0.4%	20.9%	0.5%	0.2%	2.8%	100.0%
	Number 2008	29,396	31,632	1,573	662	17,969	248	331	994	82,807
	Percent 2008	35.5%	38.2%	1.9%	0.8%	21.7%	0.3%	0.4%	1.2%	100.0%
	# Change	-489	5,411	-1,253	347	1,631	-110	177	-1,191	4,525
	% Change	-1.6%	20.6%	-44.3%	110.3%	10.0%	-30.6%	115.1%	-54.5%	5.8%
Fountain Valley*	Number 2000	32,144	5,870	584	171	14,100	202	129	1,778	54,978
	Percent 2000	58.5%	10.7%	1.1%	0.3%	25.6%	0.4%	0.2%	3.2%	100.0%
	Number 2008	31,166	6,720	521	463	17,437	116	116	1,390	57,929
	Percent 2008	53.8%	11.6%	0.9%	0.8%	30.1%	0.2%	0.2%	2.4%	100.0%
	# Change	-978	850	-63	292	3,337	-86	-13	-388	2,951
	% Change	-3.0%	14.5%	-10.7%	171.0%	23.7%	-42.6%	-10.2%	-21.8%	5.4%

Table A-9 continued
Regional Analysis of Fair Housing Impediments
Population by Race and Hispanic or Latino
Growth Trends 2000-2008 for Entitlement Cities

City	Year/Change	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Total
Fullerton	Number 2000	61,420	38,014	2,675	404	20,130	251	237	2,872	126,003
	Percent 2000	48.7%	30.2%	2.1%	0.3%	16.0%	0.2%	0.2%	2.3%	100.0%
	Number 2008	52,943	44,988	5,486	686	29,489	137	137	3,292	137,158
	Percent 2008	38.6%	32.8%	4.0%	0.5%	21.5%	0.1%	0.1%	2.4%	100.0%
	# Change	-8,477	6,974	2,811	282	9,359	-114	-100	420	11,155
	% Change	-13.8%	18.3%	105.1%	69.8%	46.5%	-45.4%	-42.1%	14.6%	8.9%
Garden Grove	Number 2000	53,735	53,608	1,873	523	50,803	995	210	3,449	165,196
	Percent 2000	32.5%	32.5%	1.1%	0.3%	30.8%	0.6%	0.1%	2.1%	100.0%
	Number 2008	41,582	69,476	2,080	173	58,215	69	347	1,387	173,329
	Percent 2008	24.0%	40.1%	1.2%	0.1%	33.6%	0.0%	0.2%	0.8%	100.0%
	# Change	-12,153	15,868	207	-350	7,412	-926	137	-2,062	8,133
	% Change	-22.6%	29.6%	11.0%	-66.9%	14.6%	-93.0%	65.1%	-59.8%	4.9%
Huntington Beach	Number 2000	136,237	27,798	1,383	777	17,544	432	314	5,109	189,594
	Percent 2000	71.9%	14.7%	0.7%	0.4%	9.3%	0.2%	0.2%	2.7%	100.0%
	Number 2008	140,297	31,244	1,008	403	22,375	1,613	403	4,233	201,576
	Percent 2008	69.6%	15.5%	0.5%	0.2%	11.1%	0.8%	0.2%	2.1%	100.0%
	# Change	4,060	3,446	-375	-374	4,831	1,181	89	-876	11,982
	% Change	3.0%	12.4%	-27.1%	-48.1%	27.5%	273.3%	28.4%	-17.1%	6.3%
Irvine	Number 2000	81,613	10,539	1,977	162	42,506	180	359	5,736	143,072
	Percent 2000	57.0%	7.4%	1.4%	0.1%	29.7%	0.1%	0.3%	4.0%	100.0%
	Number 2008	105,467	18,698	2,311	420	75,844	420	840	6,093	210,094
	Percent 2008	50.2%	8.9%	1.1%	0.2%	36.1%	0.2%	0.4%	2.9%	100.0%
	# Change	23,854	8,159	334	258	33,338	240	481	357	67,022
	% Change	29.2%	77.4%	16.9%	159.4%	78.4%	133.4%	134.1%	6.2%	46.8%

Table A-9 continued
Regional Analysis of Fair Housing Impediments
Population by Race and Hispanic or Latino
Growth Trends 2000-2008 for Entitlement Cities

City	Year/Change	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Total
La Habra*	Number 2000	24,399	28,922	808	188	3,432	89	95	1041	58,974
	Percent 2000	41.4%	49.0%	1.4%	0.3%	5.8%	0.2%	0.2%	1.8%	100.0%
	Number 2008	19,634	35,641	1,188	125	4,940	125	125	750	62,528
	Percent 2008	31.4%	57.0%	1.9%	0.2%	7.9%	0.2%	0.2%	1.2%	100.0%
	# Change	-4,765	6,719	380	-63	1,508	36	30	-291	3,554
	% Change	-19.5%	23.2%	47.0%	-33.5%	43.9%	40.5%	31.6%	-27.9%	6.0%
Lake Forest	Number 2000	39,161	10,913	998	143	5,647	113	102	1,630	58,707
	Percent 2000	66.7%	18.6%	1.7%	0.2%	9.6%	0.2%	0.2%	2.8%	100.0%
	Number 2008	44,895	18,817	1,327	78	11,087	156	156	1,562	78,078
	Percent 2008	57.5%	24.1%	1.7%	0.1%	14.2%	0.2%	0.2%	2.0%	100.0%
	# Change	5,734	7,904	329	-65	5,440	43	54	-68	19,371
	% Change	14.6%	72.4%	33.0%	-45.4%	96.3%	38.2%	53.1%	-4.2%	33.0%
Newport Beach	Number 2000	62,342	3,301	354	137	2,763	81	93	961	70,032
	Percent 2000	89.0%	4.7%	0.5%	0.2%	3.9%	0.1%	0.1%	1.4%	100.0%
	Number 2008	NA	NA	NA	NA	NA	NA	NA	NA	85,145
	Percent 2008	NA	NA	NA	NA	NA	NA	NA	NA	100.0%
	# Change	NA	NA	NA	NA	NA	NA	NA	NA	15,113
	% Change	NA	NA	NA	NA	NA	NA	NA	NA	21.6%
Orange	Number 2000	70,292	41,434	1,798	393	11,898	268	162	2,576	128,821
	Percent 2000	54.6%	32.2%	1.4%	0.3%	9.2%	0.2%	0.1%	2.0%	100.0%
	Number 2008	64,344	56,037	1,549	282	15,347	282	141	2,816	140,796
	Percent 2008	45.7%	39.8%	1.1%	0.2%	10.9%	0.2%	0.1%	2.0%	100.0%
	# Change	-5,948	14,603	-249	-111	3,449	14	-21	240	11,975
	% Change	-8.5%	35.2%	-13.9%	-28.3%	29.0%	5.1%	-13.1%	9.3%	9.3%

Table A-9 continued
Regional Analysis of Fair Housing Impediments
Population by Race and Hispanic or Latino
Growth Trends 2000-2008 for Entitlement Cities

City	Year/Change	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Total
Rancho Santa Margarita*	Number 2000	35,132	6,139	787	131	3,440	90	91	1,404	47,214
	Percent 2000	74.4%	13.0%	1.7%	0.3%	7.3%	0.2%	0.2%	3.0%	100.0%
	Number 2008	35,989	7,386	744	149	4,263	0	0	1,041	49,572
	Percent 2008	72.6%	14.9%	1.5%	0.3%	8.6%	0.0%	0.0%	2.1%	100.0%
	# Change	857	1,247	-43	18	823	-90	-91	-363	2,358
	% Change	2.4%	20.3%	-5.5%	13.5%	23.9%	-100.0%	-100.0%	-25.9%	5.0%
Santa Ana	Number 2000	41,984	257,097	4,309	886	29,412	993	273	3,023	337,977
	Percent 2000	12.4%	76.1%	1.3%	0.3%	8.7%	0.3%	0.1%	0.9%	100.0%
	Number 2008	33,543	284,234	3,885	353	29,306	106	353	1,413	353,193
	Percent 2008	9.5%	80.5%	1.1%	0.1%	8.3%	0.0%	0.1%	0.4%	100.0%
	# Change	-8,441	27,137	-424	-533	-106	-887	80	-1,610	15,216
	% Change	-20.1%	10.6%	-9.8%	-60.1%	-0.4%	-89.3%	29.4%	-53.3%	4.5%
Westminster	Number 2000	31,962	19,138	764	293	33,511	393	101	2,045	88,207
	Percent 2000	36.2%	21.7%	0.9%	0.3%	38.0%	0.4%	0.1%	2.3%	100.0%
	Number 2008	NA	NA	NA	NA	NA	NA	NA	NA	92,854
	Percent 2008	NA	NA	NA	NA	NA	NA	NA	NA	100.0%
	# Change	NA	NA	NA	NA	NA	NA	NA	NA	4,647
	% Change	NA	NA	NA	NA	NA	NA	NA	NA	5.3%

* Denotes 2006-2008 ACS 3-Year Estimate Data

Source: Census 2000, Summary File 1, Table P4 Hispanic or Latino by Race, Not Hispanic or Latino. 2008 American Community Survey (ACS) 1 Year Estimates, Select Demographic Characteristics. State of California, Department of Finance, Demographic Research Unit, [City and County Summary Report of Population and Housing -- Report E-5](#), January 1, 2008 and January 1, 2009

Table construction by Castañeda & Associates

Note: The ACS data was used for determining the percent breakdown for the population, which was then applied to a mid year-2008 estimate of DOF population estimates.

Table A-10
Regional Analysis of Fair Housing Impediments
Population by Race and Hispanic or Latino
Growth Trends 2000-2008 for Urban County Cities

City	Year/Change	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Total
Aliso Viejo	Number 2000	28,599	4,680	790	107	4,367	78	102	1,443	40,166
	Percent 2000	71.2%	11.7%	2.0%	0.3%	10.9%	0.2%	0.3%	3.6%	100.0%
	Number 2008	27,833	8,718	1,544	91	6,039	0	136	1,044	45,404
	Percent 2008	61.3%	19.2%	3.4%	0.2%	13.3%	0.0%	0.3%	2.3%	100.0%
	# Change	-766	4,038	754	-16	1,672	-78	34	-399	5,238
	% Change	-2.7%	86.3%	95.4%	-15.1%	38.3%	-100.0%	33.5%	-27.6%	13.0%
Brea	Number 2000	23,541	7,205	409	111	3,184	71	57	832	35,410
	Percent 2000	66.5%	20.3%	1.2%	0.3%	9.0%	0.2%	0.2%	2.3%	100.0%
	Number 2008	23,319	8,320	640	80	6,440	40	160	1,000	39,998
	Percent 2008	58.3%	20.8%	1.6%	0.2%	16.1%	0.1%	0.4%	2.5%	100.0%
	# Change	-222	1,115	231	-31	3,256	-31	103	168	4,588
	% Change	-0.9%	15.5%	56.5%	-27.9%	102.3%	-43.7%	180.7%	20.2%	13.0%
Cypress	Number 2000	26,400	7,235	1,251	176	9,564	164	112	1,327	46,229
	Percent 2000	57.1%	15.7%	2.7%	0.4%	20.7%	0.4%	0.2%	2.9%	100.0%
	Number 2008	24,272	8,305	1,137	198	13,842	346	99	1,236	49,434
	Percent 2008	49.1%	16.8%	2.3%	0.4%	28.0%	0.7%	0.2%	2.5%	100.0%
	# Change	-2,128	1,070	-114	22	4,278	182	-13	-91	3,205
	% Change	-8.1%	14.8%	-9.1%	12.4%	44.7%	111.0%	-11.7%	-6.9%	6.9%

Table A-10 continued
Regional Analysis of Fair Housing Impediments
Population by Race and Hispanic or Latino
Growth Trends 2000-2008 for Urban County Cities

City	Year/Change	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Total
Dana Point	Number 2000	27,658	5,440	252	123	874	31	76	656	35,110
	Percent 2000	78.8%	15.5%	0.7%	0.4%	2.5%	0.1%	0.2%	1.9%	100.0%
	Number 2008	28,940	5,131	406	111	923	37	664	701	36,913
	Percent 2008	78.4%	13.9%	1.1%	0.3%	2.5%	0.1%	1.8%	1.9%	100.0%
	# Change	1,282	-309	154	-12	49	6	588	45	1,803
	% Change	4.6%	-5.7%	61.1%	-10.0%	5.6%	19.1%	774.3%	6.9%	5.1%
Laguna Beach	Number 2000	20,921	1,570	183	59	486	19	36	453	23,727
	Percent 2000	88.2%	6.6%	0.8%	0.2%	2.0%	0.1%	0.2%	1.9%	100.0%
	Number 2008	NA	NA	NA	NA	NA	NA	NA	NA	25,087
	Percent 2008	NA	NA	NA	NA	NA	NA	NA	NA	100.0%
	# Change	NA	NA	NA	NA	NA	NA	NA	NA	1,360
	% Change	NA	NA	NA	NA	NA	NA	NA	NA	5.7%
Laguna Hills	Number 2000	21,471	5,113	404	77	3,153	45	73	842	31,178
	Percent 2000	68.9%	16.4%	1.3%	0.2%	10.1%	0.1%	0.2%	2.7%	100.0%
	Number 2008	21,391	7,230	700	33	2,899	100	133	833	33,319
	Percent 2008	64.2%	21.7%	2.1%	0.1%	8.7%	0.3%	0.4%	2.5%	100.0%
	# Change	-80	2,117	296	-44	-254	55	60	-9	2,141
	% Change	-0.4%	41.4%	73.2%	-56.7%	-8.1%	122.1%	82.6%	-1.1%	6.9%
Los Alamitos	Number 2000	7,836	1,848	358	31	1,090	35	18	320	11,536
	Percent 2000	67.9%	16.0%	3.1%	0.3%	9.4%	0.3%	0.2%	2.8%	100.0%
	Number 2008	NA	NA	NA	NA	NA	NA	NA	NA	12,165
	Percent 2008	NA	NA	NA	NA	NA	NA	NA	NA	100.0%
	# Change	NA	NA	NA	NA	NA	NA	NA	NA	629
	% Change	NA	NA	NA	NA	NA	NA	NA	NA	5.5%

Table A-10 continued
Regional Analysis of Fair Housing Impediments
Population by Race and Hispanic or Latino
Growth Trends 2000-2008 for Urban County Cities

City	Year/Change	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Total
La Palma	Number 2000	5,592	1,736	696	37	6,874	43	35	395	15,408
	Percent 2000	36.3%	11.3%	4.5%	0.2%	44.6%	0.3%	0.2%	2.6%	100.0%
	Number 2008	NA	NA	NA	NA	NA	NA	NA	NA	16,139
	Percent 2008	NA	NA	NA	NA	NA	NA	NA	NA	100.0%
	# Change	NA	NA	NA	NA	NA	NA	NA	NA	731
	% Change	NA	NA	NA	NA	NA	NA	NA	NA	4.7%
Laguna Woods	Number 2000	15,580	340	41	18	412	4	7	105	16,507
	Percent 2000	94.4%	2.1%	0.2%	0.1%	2.5%	0.0%	0.0%	0.6%	100.0%
	Number 2008	NA	NA	NA	NA	NA	NA	NA	NA	18,399
	Percent 2008	NA	NA	NA	NA	NA	NA	NA	NA	100.0%
	# Change	NA	NA	NA	NA	NA	NA	NA	NA	1,892
	% Change	NA	NA	NA	NA	NA	NA	NA	NA	11.5%
Placentia	Number 2000	24,967	14,460	746	177	5,121	65	61	891	46,488
	Percent 2000	53.7%	31.1%	1.6%	0.4%	11.0%	0.1%	0.1%	1.9%	100.0%
	Number 2008	23,225	19,664	671	103	6,813	361	103	671	51,612
	Percent 2008	45.0%	38.1%	1.3%	0.2%	13.2%	0.7%	0.2%	1.3%	100.0%
	# Change	-1,742	5,204	-75	-74	1,692	296	42	-220	5,124
	% Change	-7.0%	36.0%	-10.1%	-41.7%	33.0%	455.8%	69.2%	-24.7%	11.0%
Seal Beach	Number 2000	20,372	1,554	329	54	1,363	37	21	427	24,157
	Percent 2000	84.3%	6.4%	1.4%	0.2%	5.6%	0.2%	0.1%	1.8%	100.0%
	Number 2008	21,210	1,811	259	207	1,733	0	129	517	25,866
	Percent 2008	82.0%	7.0%	1.0%	0.8%	6.7%	0.0%	0.5%	2.0%	100.0%
	# Change	838	257	-70	153	370	-37	108	90	1,709
	% Change	4.1%	16.5%	-21.4%	283.2%	27.1%	-100.0%	515.9%	21.2%	7.1%

Table A-10 continued
Regional Analysis of Fair Housing Impediments
Population by Race and Hispanic or Latino
Growth Trends 2000-2008 for Urban County Cities

City	Year/Change	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Total
Stanton	Number 2000	11,295	18,285	721	155	5,721	322	57	847	37,403
	Percent 2000	30.2%	48.9%	1.9%	0.4%	15.3%	0.9%	0.2%	2.3%	100.0%
	Number 2008	9,459	19,743	1,021	157	8,007	236	196	432	39,251
	Percent 2008	24.1%	50.3%	2.6%	0.4%	20.4%	0.6%	0.5%	1.1%	100.0%
	# Change	-1,836	1,458	300	2	2,286	-86	139	-415	1,848
	% Change	-16.3%	8.0%	41.5%	1.3%	40.0%	-26.9%	244.3%	-49.0%	4.9%
Villa Park	Number 2000	4,691	354	41	22	769	2	4	116	5,999
	Percent 2000	78.2%	5.9%	0.7%	0.4%	12.8%	0.0%	0.1%	1.9%	100.0%
	Number 2008	NA	NA	NA	NA	NA	NA	NA	NA	6,248
	Percent 2008	NA	NA	NA	NA	NA	NA	NA	NA	100.0%
	# Change	NA	NA	NA	NA	NA	NA	NA	NA	249
	% Change	NA	NA	NA	NA	NA	NA	NA	NA	4.2%
Yorba Linda	Number 2000	44,071	6,044	638	139	6,502	50	138	1,336	58,918
	Percent 2000	74.8%	10.3%	1.1%	0.2%	11.0%	0.1%	0.2%	2.3%	100.0%
	Number 2008	46,676	8,301	1,361	613	9,390	14	476	1,225	68,056
	Percent 2008	68.6%	12.2%	2.0%	0.9%	13.8%	0.0%	0.7%	1.8%	100.0%
	# Change	2,605	2,257	723	474	2,888	-36	338	-111	9,138
	% Change	5.9%	37.3%	113.3%	340.7%	44.4%	-72.8%	245.2%	-8.3%	15.5%

Source: Census 2000, Summary File 1, Table P4 Hispanic or Latino by Race, Not Hispanic or Latino. 2008 American Community Survey (ACS) 3-Year Estimates, Select Demographic Characteristics. State of California, Department of Finance, Demographic Research Unit, [City and County Summary Report of Population and Housing -- Report E-5](#), January 1, 2008 and January 1, 2009

Table construction by Castañeda & Associates

Note: The ACS data was used for determining the percent breakdown for the population, which was then applied to a mid year-2008 estimate of DOF population estimates.

Table A-11
Regional Analysis of Fair Housing Impediments
Household Type for Entitlement Cities - 2008

City	Married Couple Families	Percent	Male Householder, No Wife Present	Percent	Female Householder, No Husband Present	Percent	Non-Family Households	Percent	Total Households
Anaheim	54,620	55.1%	4,758	4.8%	16,059	16.2%	23,692	23.9%	99,129
Buena Park	13,353	56.0%	1,478	6.2%	4,220	17.7%	4,793	20.1%	23,844
Fountain Valley*	11,571	62.5%	926	5.0%	1,463	7.9%	4,554	24.6%	18,514
Fullerton	23,485	51.2%	1,743	3.8%	5,045	11.0%	15,595	34.0%	45,868
Garden Grove	25,337	54.5%	4,463	9.6%	6,787	14.6%	9,902	21.3%	46,489
Huntington Beach	39,044	51.4%	3,950	5.2%	7,900	10.4%	25,067	33.0%	75,961
Irvine	38,977	52.1%	3,666	4.9%	6,509	8.7%	25,661	34.3%	74,813
Lake Forest	14,604	56.8%	1,800	7.0%	1,491	5.8%	7,816	30.4%	25,711
La Habra*	10,009	51.5%	1,458	7.5%	2,974	15.3%	4,995	25.7%	19,436
Newport Beach	18,244	47.5%	922	2.4%	2,612	6.8%	16,631	43.3%	38,409
Orange	24,767	57.1%	2,429	5.6%	4,337	10.0%	11,841	27.3%	43,374
Rancho Santa Margarita	10,279	62.2%	793	4.8%	1,405	8.5%	4,049	24.5%	16,526
Santa Ana	39,089	52.8%	8,292	11.2%	12,659	17.1%	13,992	18.9%	74,032
Westminster	15,542	57.8%	1,775	6.6%	3,092	11.5%	6,480	24.1%	26,889
Total	338,921	53.9%	38,453	6.1%	76,553	12.2%	175,068	27.8%	628,995

*Denotes data from the 2006-2008 ACS estimate

Source: 2008 American Community Survey (ACS) 1-Year Estimates, Select Demographic Characteristics. State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2008 and January 1, 2009

Table construction by Castañeda & Associates

Table A-12
Regional Analysis of Fair Housing Impediments
Household Type for Urban County Cities - 2008

City	Married Couple Families	Percent	Male Householder, No Wife Present	Percent	Female Householder, No Husband Present	Percent	Non-Family Households	Percent	Total Households
Aliso Viejo	8,810	50.1%	545	3.1%	1,460	8.3%	6,770	38.5%	17,585
Brea	7,867	55.0%	544	3.8%	1,545	10.8%	4,348	30.4%	14,303
Cypress	9,849	60.7%	681	4.2%	2,369	14.6%	3,326	20.5%	16,225
Dana Point	7,690	52.3%	573	3.9%	1,338	9.1%	5,102	34.7%	14,704
Laguna Beach	5,038	42.8%	530	4.5%	612	5.2%	5,592	47.5%	11,772
Laguna Hills	6,873	63.6%	378	3.5%	1,092	10.1%	2,464	22.8%	10,807
Laguna Woods	NA	NA	NA	NA	NA	NA	NA	NA	12,591
La Palma	NA	NA	NA	NA	NA	NA	NA	NA	5,043
Los Alamitos	NA	NA	NA	NA	NA	NA	NA	NA	4,339
Placentia	9,274	57.3%	906	5.6%	2,023	12.5%	3,982	24.6%	16,185
Seal Beach	4,930	36.8%	121	0.9%	710	5.3%	7,636	57.0%	13,397
Stanton	5,543	50.7%	492	4.5%	1,727	15.8%	3,171	29.0%	10,933
Villa Park	NA	NA	NA	NA	NA	NA	NA	NA	1,964
Yorba Linda	15,349	71.2%	884	4.1%	1,660	7.7%	3,665	17.0%	21,558
Total¹	81,224	55.1%	5,654	3.8%	14,535	9.9%	46,056	31.2%	147,469

¹Totals are only for the cities that have ACS data and exclude the cities of Laguna Woods, La Palma, Los Alamitos and Villa Park all of which have populations of less than 20,000. The ACS 3-Year estimates are available for cities having populations between 20,000 and 65,000 persons. The percentages are based on the total for the known cities (147,469).

Source: 2006-2008 American Community Survey (ACS) 3-Year Estimates, Select Social Characteristics. State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2008 and January 1, 2009

Table construction by Castañeda & Associates

Table A-13
Regional Analysis of Fair Housing Impediments
Households with Children under 18 Years of Age by Type of Household
Entitlement Cities – 2008

City	Married Couple Families	Percent of All Households	Male Householder, No Wife Present	Percent of All Households	Female Householder, No Husband Present	Percent of All Households	Total	Percent of All Households	Total Households
Anaheim	31,226	31.5%	1,883	1.9%	8,723	8.8%	41,832	42.2%	99,129
Buena Park	9,347	39.2%	501	2.1%	1,836	7.7%	11,684	49.0%	23,844
Fountain Valley*	4,684	25.3%	296	1.6%	574	3.1%	5,554	30.0%	18,514
Fullerton	10,962	23.9%	871	1.9%	2,477	5.4%	14,311	31.2%	45,868
Garden Grove	14,179	30.5%	1,162	2.5%	3,115	6.7%	18,456	39.7%	46,489
Huntington Beach	16,256	21.4%	1,367	1.8%	3,874	5.1%	21,497	28.3%	75,961
Irvine	19,751	26.4%	2,020	2.7%	2,693	3.6%	24,464	32.7%	74,813
Lake Forest	7,251	28.2%	823	3.2%	694	2.7%	8,767	34.1%	25,711
La Habra*	5,073	26.1%	603	3.1%	1,769	9.1%	7,444	38.3%	19,436
Newport Beach	8,143	21.2%	346	0.9%	1,383	3.6%	9,871	25.7%	38,409
Orange	11,537	26.6%	954	2.2%	2,472	5.7%	14,964	34.5%	43,374
Rancho Santa Margarita*	6,363	38.5%	331	2.0%	826	5.0%	7,520	45.5%	16,526
Santa Ana	25,467	34.4%	5,108	6.9%	7,403	10.0%	37,978	51.3%	74,032
Westminster	7,529	28.0%	323	1.2%	1,533	5.7%	9,384	34.9%	26,889
Total	177,768	28.0%	16,588	2.7%	39,372	6.3%	233,726	36.9%	628,995

*Denotes data from 3-Year 2006-2008 estimate

Source: 2008 American Community Survey (ACS) 1-Year Estimates, Select Demographic Characteristics. State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2008 and January 1, 2009

Table construction by Castañeda & Associates

Table A-14
Regional Analysis of Fair Housing Impediments
Households with Children under 18 Years of Age by Type of Household
Urban County Cities – 2008

City	Married Couple Families	Percent of All Households	Male Householder, No Wife Present	Percent of All Households	Female Householder, No Husband Present	Percent of All Households	Total	Percent of All Households	Total Households
Aliso Viejo	4,977	28.3%	264	1.5%	844	4.8%	6,084	34.6%	17,585
Brea	3,561	24.9%	200	1.4%	744	5.2%	4,505	31.5%	14,303
Cypress	4,738	29.2%	373	2.3%	925	5.7%	6,036	37.2%	16,225
Dana Point	2,603	17.7%	221	1.5%	779	5.3%	3,602	24.5%	14,704
Laguna Beach	1,460	12.4%	224	1.9%	341	2.9%	2,025	17.2%	11,772
Laguna Hills	2,885	26.7%	195	1.8%	659	6.1%	3,739	34.6%	10,807
Laguna Woods	NA	NA	NA	NA	NA	NA	NA	NA	12,591
La Palma	NA	NA	NA	NA	NA	NA	NA	NA	5,043
Los Alamitos	NA	NA	NA	NA	NA	NA	NA	NA	4,339
Placentia	4,645	28.7%	469	2.9%	939	5.8%	6,053	37.4%	16,185
Seal Beach	1,233	9.2%	67	0.5%	281	2.1%	1,581	11.8%	13,397
Stanton	3,160	28.9%	219	2.0%	951	8.7%	4,329	39.6%	10,933
Villa Park	NA	NA	NA	NA	NA	NA	NA	NA	1,964
Yorba Linda	7,114	33.0%	366	1.7%	755	3.5%	8,235	38.2%	21,558
Total¹	36,375	24.7%	2,597	1.8%	7,218	4.9%	46,191	31.3%	147,469

¹Totals are only for the cities that have ACS data and exclude the cities of Laguna Woods, La Palma, Los Alamitos and Villa Park all of which have populations of less than 20,000. The ACS 3-Year estimates are available for cities having populations between 20,000 and 65,000 persons. The percentages are based on the total for the known cities (147,469).

Source: 2006-2008 American Community Survey (ACS) 3-Year Estimates, Select Social Characteristics. State of California, Department of Finance, Demographic Research Unit, City and County Summary Report of Population and Housing -- Report E-5, January 1, 2008 and January 1, 2009

Table construction by Castañeda & Associates

Table A-15
Regional Analysis of Fair Housing Impediments
Poverty Rates for Female Householders
And Presence of Children for Entitlement Cities – 2008

City	With Related Children <5 Years	With Related Children <18 Years	All Female Householder Families
Anaheim	20.6%	27.0%	19.8%
Buena Park	0.0%	15.1%	10.2%
Fountain Valley*	0.0%	13.3%	8.0%
Fullerton	16.1%	31.7%	23.1%
Garden Grove	36.2%	28.7%	22.5%
Huntington Beach	15.1%	8.5%	10.2%
Irvine	11.6%	9.9%	6.8%
La Habra*	52.0%	27.9%	21.3%
Lake Forest	N/A	N/A	N/A
Newport Beach	N/A	5.3%	13.7%
Orange	14.4%	14.5%	11.4%
Rancho Santa Margarita*	44.1%	7.0%	4.6%
Santa Ana	25.7%	31.4%	23.8%
Westminster	0.0%	17.8%	10.6%

*Denotes data from 3-Year 2006-2008 ACS estimate

Source: 2008 American Community Survey (ACS) 1-Year Estimates,
 Select Income Characteristics

Table construction by Castañeda & Associates

Table A-16
Regional Analysis of Fair Housing Impediments
Poverty Rates for Female Householders
And Presence of Children for Urban County Cities – 2008

City	With Related Children <5 Years	With Related Children <18 Years	All Female Householder Families
Aliso Viejo	12.3%	18.6%	12.8%
Brea	100.0%	18.7%	9.6%
Cypress	0.0%	9.2%	6.1%
Dana Point	23.6%	10.2%	6.8%
Laguna Beach	N/A	15.3%	12.2%
Laguna Hills	0.0%	30.6%	20.4%
Laguna Woods	N/A	N/A	N/A
La Palma	N/A	N/A	N/A
Los Alamitos	N/A	N/A	N/A
Placentia	59.3%	32.4%	21.0%
Seal Beach	N/A	N/A	N/A
Stanton	28.7%	51.7%	33.3%
Villa Park	N/A	N/A	N/A
Yorba Linda	20.7%	22.2%	12.5%

Source: 2008 American Community Survey (ACS) 3-Year Estimates,
 Select Income Characteristics

Table construction by Castañeda & Associates

Table A-17
Regional Analysis of Fair Housing Impediments
Marital Status for Entitlement Cities – 2008

City	Married Households	Percent	Not Married Households	Percent	Total Households
Anaheim	54,620	55.1%	44,509	44.9%	99,129
Buena Park	13,353	56.0%	10,491	44.0%	23,844
Fountain Valley*	11,553	62.4%	6,961	37.6%	18,514
Fullerton	23,439	51.1%	22,429	48.9%	45,868
Garden Grove	25,337	54.5%	21,152	45.5%	46,489
Huntington Beach	39,044	51.4%	36,917	48.6%	75,961
Irvine	39,052	52.2%	35,761	47.8%	74,813
La Habra*	10,010	51.5%	9,426	48.5%	19,436
Lake Forest	14,578	56.7%	11,133	43.3%	25,711
Newport Beach	18,244	47.5%	20,165	52.5%	38,409
Orange	24,810	57.2%	18,564	42.8%	43,374
Rancho Santa Margarita*	10,296	62.3%	6,230	37.7%	16,526
Santa Ana	39,089	52.8%	34,943	47.2%	74,032
Westminster	15,542	57.8%	11,347	42.2%	26,889
Total	338,965	53.9%	290,030	46.1%	628,995

*Denotes data from 3-Year 2006-2008 ACS estimate

Source: 2008 American Community Survey (ACS) 1-Year Estimates, Select Social Characteristics. California Department of Finance (DOF) Mid-Point Estimate for 2008 Occupied Housing Units (Households) for January 1, 2008 and January 1, 2009

Table construction by Castañeda & Associates

Table A-18
Regional Analysis of Fair Housing Impediments
Marital Status for Urban County – 2008

City	Married Households	Percent	Not Married Households	Percent	Total Households
Aliso Viejo	8,810	50.1%	8,775	49.9%	17,585
Brea	7,852	54.9%	6,451	45.1%	14,303
Cypress	9,865	60.8%	6,360	39.2%	16,225
Dana Point	7,675	52.2%	7,029	47.8%	14,704
Laguna Beach	5,038	42.8%	6,734	57.2%	11,772
Laguna Hills	6,862	63.5%	3,945	36.5%	10,807
Laguna Woods	N/A	N/A	N/A	N/A	12,591
La Palma	N/A	N/A	N/A	N/A	5,043
Los Alamitos	N/A	N/A	N/A	N/A	4,339
Placentia	9,290	57.4%	6,895	42.6%	16,185
Seal Beach	4,930	36.8%	8,467	63.2%	13,397
Stanton	5,543	50.7%	5,390	49.3%	10,933
Villa Park	N/A	N/A	N/A	N/A	1,964
Yorba Linda	15,371	71.3%	6,187	28.7%	21,558
Total¹	81,238	55.1%	66,231	44.9%	147,469

¹Totals are only for the cities that have ACS data and exclude the cities of Laguna Woods, La Palma, Los Alamitos and Villa Park all of which have populations of less than 20,000. The ACS 3-Year estimates are available for cities having populations between 20,000 and 65,000 persons. The percentages are based on the total for the known cities (147,469).

Source: 2008 American Community Survey (ACS) 3-Year Estimates, Select Social Characteristics. California Department of Finance (DOF) Mid-Point Estimate for 2008 Occupied Housing Units (Households) for January 1, 2008 and January 1, 2009

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Technical Appendix B

Minority Population by Census Tract

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
525.18	0	0	0	0	0	0	0	3	3	3	100.00%
745.01	82	7,115	5	21	842	13	7	148	8,233	8,151	99.00%
748.06	80	5,801	161	2	74	14	13	9	6,154	6,074	98.70%
749.02	102	7,080	15	4	43	2	0	15	7,261	7,159	98.60%
748.01	107	5,722	244	30	130	20	1	13	6,267	6,160	98.29%
749.01	185	9,533	50	30	272	22	8	29	10,129	9,944	98.17%
747.01	198	8,588	72	6	135	34	0	42	9,075	8,877	97.82%
748.05	156	6,298	76	15	100	27	14	24	6,710	6,554	97.68%
992.49	121	3,472	26	8	770	21	0	25	4,443	4,322	97.28%
752.01	162	5,426	71	16	240	1	2	30	5,948	5,786	97.28%
745.02	178	5,637	7	19	361	32	0	46	6,280	6,102	97.17%
746.02	284	9,222	27	5	76	14	3	18	9,649	9,365	97.06%
891.05	232	6,133	18	22	635	11	5	25	7,081	6,849	96.72%
743.00	147	4,204	5	19	15	3	0	22	4,415	4,268	96.67%
750.03	299	7,773	49	42	25	0	16	28	8,232	7,933	96.37%
747.02	270	6,328	9	19	18	15	4	17	6,680	6,410	95.96%
750.04	247	5,444	29	0	44	4	2	9	5,779	5,532	95.73%
750.02	426	8,639	86	20	395	2	3	39	9,610	9,184	95.57%
744.03	298	5,861	18	19	153	4	0	21	6,374	6,076	95.32%
741.09	200	3,486	13	25	270	15	1	22	4,032	3,832	95.04%
740.03	125	2,266	25	8	39	4	1	16	2,484	2,359	94.97%
742.00	504	8,899	23	16	118	16	8	27	9,611	9,107	94.76%
752.02	322	5,519	98	25	139	0	11	23	6,137	5,815	94.75%
744.05	371	6,450	32	5	64	3	11	29	6,965	6,594	94.67%
741.08	313	4,515	40	13	331	37	0	38	5,287	4,974	94.08%
748.02	375	5,218	163	22	180	22	3	58	6,041	5,666	93.79%
741.02	524	5,996	110	19	696	30	9	44	7,428	6,904	92.95%
746.01	626	7,998	29	29	110	23	4	42	8,861	8,235	92.94%
891.04	449	4,384	37	10	1,130	19	0	45	6,074	5,625	92.61%
741.03	385	4,646	13	21	79	21	1	30	5,196	4,811	92.59%
744.07	573	6,765	100	6	161	8	6	68	7,687	7,114	92.55%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
117.20	562	6,612	93	24	158	11	10	65	7,535	6,973	92.54%
865.02	510	5,995	34	24	77	1	1	36	6,678	6,168	92.36%
748.03	702	6,623	177	26	1,409	33	4	78	9,052	8,350	92.24%
744.06	311	3,402	31	14	55	8	1	16	3,838	3,527	91.90%
874.04	323	3,338	34	14	53	9	0	14	3,785	3,462	91.47%
890.01	794	3,704	54	30	2,835	46	1	110	7,574	6,780	89.52%
874.05	716	5,504	101	20	235	16	4	53	6,649	5,933	89.23%
890.04	812	4,865	68	5	1,596	34	6	53	7,439	6,627	89.08%
992.47	380	1,765	24	14	1,176	31	1	27	3,418	3,038	88.88%
992.48	608	3,297	73	3	1,300	44	1	39	5,365	4,757	88.67%
890.03	436	2,009	84	4	1,155	37	1	82	3,808	3,372	88.55%
875.04	1,038	6,342	106	35	587	22	0	118	8,248	7,210	87.42%
866.01	1,255	7,746	247	26	455	29	13	101	9,872	8,617	87.29%
878.03	862	4,415	135	16	808	89	12	105	6,442	5,580	86.62%
740.05	1,051	5,238	103	21	1,110	26	20	85	7,654	6,603	86.27%
874.03	531	3,059	21	9	92	2	0	21	3,735	3,204	85.78%
889.03	1,225	2,289	45	16	4,776	59	12	172	8,594	7,369	85.75%
873.00	1,502	7,428	216	23	716	16	3	137	10,041	8,539	85.04%
865.01	732	3,843	36	16	79	1	2	39	4,748	4,016	84.58%
1106.06	798	2,805	249	18	860	10	6	95	4,841	4,043	83.52%
864.05	1,150	5,067	100	8	288	10	17	59	6,699	5,549	82.83%
116.02	990	4,460	113	19	123	3	1	53	5,762	4,772	82.82%
992.02	1,402	4,206	88	54	2,194	49	10	114	8,117	6,715	82.73%
744.08	916	3,664	213	24	322	17	7	76	5,239	4,323	82.52%
879.02	1,072	3,586	81	11	1,019	86	1	127	5,983	4,911	82.08%
889.04	1,043	682	20	3	3,927	26	7	101	5,809	4,766	82.05%
864.04	1,121	4,347	57	24	585	5	6	72	6,217	5,096	81.97%
891.06	689	2,317	32	7	680	12	3	44	3,784	3,095	81.79%
891.02	1,282	4,232	69	23	1,182	57	4	105	6,954	5,672	81.56%
12.01	991	3,991	59	18	213	3	0	96	5,371	4,380	81.55%
753.02	852	3,440	86	3	181	6	6	34	4,608	3,756	81.51%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
889.02	959	1,363	34	14	2,601	82	4	79	5,136	4,177	81.33%
88.01	1,547	1,593	108	17	4,701	53	8	179	8,206	6,659	81.15%
741.11	1,135	3,579	153	12	938	15	6	84	5,922	4,787	80.83%
117.14	58	227	0	3	9	0	0	5	302	244	80.79%
637.01	1,296	5,028	60	11	189	20	12	76	6,692	5,396	80.63%
875.01	1,214	4,135	79	8	442	3	4	65	5,950	4,736	79.60%
889.05	1,028	835	30	13	2,991	10	1	72	4,980	3,952	79.36%
755.14	824	2,430	127	15	424	24	5	74	3,923	3,099	79.00%
755.15	1,588	4,325	227	24	1,129	16	19	154	7,482	5,894	78.78%
1105.00	1,843	4,663	417	40	1,382	61	16	177	8,599	6,756	78.57%
762.04	1,150	3,716	28	15	393	4	1	53	5,360	4,210	78.54%
751.00	2,250	7,416	258	13	336	12	11	126	10,422	8,172	78.41%
998.03	1,165	1,397	33	13	2,671	9	6	87	5,381	4,216	78.35%
871.02	1,279	2,816	311	11	1,237	44	5	159	5,862	4,583	78.18%
891.07	1,251	2,753	48	13	1,522	34	11	78	5,710	4,459	78.09%
1106.03	1,889	4,535	434	41	1,441	28	16	189	8,573	6,684	77.97%
636.05	1,246	4,149	50	11	93	1	3	68	5,621	4,375	77.83%
116.01	1,840	5,322	249	37	625	11	6	202	8,292	6,452	77.81%
741.10	849	1,255	89	4	1,549	9	1	70	3,826	2,977	77.81%
761.03	1,918	4,276	179	51	1,991	66	8	150	8,639	6,721	77.80%
878.06	1,203	3,153	92	20	733	53	8	145	5,407	4,204	77.75%
889.01	1,530	1,422	94	15	3,510	24	6	162	6,763	5,233	77.38%
887.01	1,433	1,987	61	22	2,635	41	2	133	6,314	4,881	77.30%
13.04	912	2,798	59	16	105	10	0	45	3,945	3,033	76.88%
994.02	2,055	5,973	60	39	468	3	2	126	8,726	6,671	76.45%
638.08	1,598	4,682	67	13	221	74	13	85	6,753	5,155	76.34%
888.02	1,309	1,656	72	5	2,312	28	2	110	5,494	4,185	76.17%
887.02	1,305	1,409	16	8	2,549	21	9	142	5,459	4,154	76.09%
740.06	1,354	3,142	171	22	657	20	9	147	5,522	4,168	75.48%
866.02	1,521	3,720	226	23	538	22	8	119	6,177	4,656	75.38%
867.02	1,645	3,741	289	7	663	51	13	237	6,646	5,001	75.25%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
885.02	1,252	2,563	54	14	1,003	42	6	89	5,023	3,771	75.07%
14.04	939	2,557	40	25	122	5	4	75	3,767	2,828	75.07%
12.02	843	2,360	25	13	72	8	4	42	3,367	2,524	74.96%
998.02	1,020	1,292	30	30	1,556	5	1	123	4,057	3,037	74.86%
875.03	1,805	4,467	143	20	520	32	4	119	7,110	5,305	74.61%
992.03	1,572	1,191	47	12	3,195	37	4	112	6,170	4,598	74.52%
884.02	1,248	2,597	80	29	815	58	4	65	4,896	3,648	74.51%
884.03	1,664	3,473	178	25	992	30	5	147	6,514	4,850	74.46%
218.13	11	28	0	0	0	0	0	4	43	32	74.42%
886.01	1,468	1,889	63	14	2,163	32	4	99	5,732	4,264	74.39%
863.01	1,801	4,482	68	25	458	6	8	82	6,930	5,129	74.01%
885.01	1,712	3,235	71	23	1,368	43	16	116	6,584	4,872	74.00%
881.07	1,557	1,316	39	35	2,699	9	13	198	5,866	4,309	73.46%
996.01	1,955	2,724	55	9	2,415	37	4	137	7,336	5,381	73.35%
423.12	2,256	5,919	20	68	73	2	1	76	8,415	6,159	73.19%
740.04	1,986	3,535	259	7	1,272	34	17	129	7,239	5,253	72.57%
999.04	1,871	2,069	56	28	2,604	35	10	128	6,801	4,930	72.49%
117.21	1,283	2,854	100	32	276	13	2	94	4,654	3,371	72.43%
879.01	909	1,579	54	16	632	21	3	58	3,272	2,363	72.22%
997.01	1,622	1,149	39	20	2,840	19	3	144	5,836	4,214	72.21%
874.01	859	1,999	40	11	84	12	2	51	3,058	2,199	71.91%
1101.16	1,369	468	200	2	2,677	21	12	99	4,848	3,479	71.76%
877.03	1,751	2,855	110	34	1,225	62	7	150	6,194	4,443	71.73%
871.06	1,422	2,865	83	42	515	12	2	49	4,990	3,568	71.50%
1106.05	1,952	520	62	7	4,122	2	12	110	6,787	4,835	71.24%
18.01	1,492	2,394	292	27	774	6	14	122	5,121	3,629	70.87%
219.13	2,506	4,907	61	28	834	24	12	110	8,482	5,976	70.46%
999.03	1,659	2,036	32	24	1,701	52	12	92	5,608	3,949	70.42%
753.01	1,576	3,041	145	21	405	13	4	77	5,282	3,706	70.16%
876.01	1,543	2,736	101	18	629	5	12	113	5,157	3,614	70.08%
755.12	1,070	1,477	95	4	730	14	3	117	3,510	2,440	69.52%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
17.07	1,906	604	96	6	3,437	9	3	131	6,192	4,286	69.22%
992.23	1,623	903	68	18	2,432	37	6	135	5,222	3,599	68.92%
1104.02	1,649	2,636	141	11	660	43	10	149	5,299	3,650	68.88%
878.05	2,165	3,417	131	25	819	61	10	169	6,797	4,632	68.15%
13.03	1,861	3,460	66	14	248	3	11	87	5,750	3,889	67.63%
18.02	2,398	3,825	246	27	658	34	18	194	7,400	5,002	67.59%
864.02	1,731	2,991	67	23	402	25	8	89	5,336	3,605	67.56%
117.22	1,021	1,662	67	13	334	1	0	38	3,136	2,115	67.44%
871.01	1,337	1,267	181	13	1,094	15	15	165	4,087	2,750	67.29%
998.01	1,825	1,613	65	26	1,826	66	3	140	5,564	3,739	67.20%
868.02	1,789	2,326	173	16	918	15	5	117	5,359	3,570	66.62%
870.01	1,819	2,478	207	35	715	35	3	111	5,403	3,584	66.33%
1101.18	944	203	115	1	1,441	1	8	78	2,791	1,847	66.18%
869.01	3,053	3,859	366	27	1,219	183	22	249	8,978	5,925	65.99%
111.02	1,560	2,213	109	16	512	11	7	100	4,528	2,968	65.55%
878.02	2,330	2,945	209	28	1,008	43	8	154	6,725	4,395	65.35%
992.04	1,506	405	37	4	2,280	28	8	74	4,342	2,836	65.32%
626.26	928	200	35	2	1,356	3	12	136	2,672	1,744	65.27%
867.01	2,991	3,965	183	26	1,220	14	16	183	8,598	5,607	65.21%
886.02	1,569	1,402	66	30	1,307	28	4	73	4,479	2,910	64.97%
872.00	2,605	3,874	205	33	485	8	10	151	7,371	4,766	64.66%
997.02	2,922	1,904	82	16	3,074	12	5	191	8,206	5,284	64.39%
761.02	2,484	2,750	290	21	1,211	28	7	133	6,924	4,440	64.12%
864.06	1,460	1,923	88	24	412	11	10	91	4,019	2,559	63.67%
1103.02	2,193	2,255	87	20	1,188	31	11	159	5,944	3,751	63.11%
1101.15	1,311	417	171	17	1,537	2	3	85	3,543	2,232	63.00%
524.04	358	500	32	12	37	7	2	19	967	609	62.98%
761.01	1,963	2,658	46	10	452	15	7	113	5,264	3,301	62.71%
869.03	2,254	2,348	185	21	930	93	5	178	6,014	3,760	62.52%
117.11	2,713	3,427	182	19	684	12	20	169	7,226	4,513	62.46%
995.02	248	139	165	6	69	9	2	18	656	408	62.20%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
871.05	1,712	1,729	117	13	776	37	5	118	4,507	2,795	62.01%
876.02	2,802	3,093	118	17	1,107	17	12	188	7,354	4,552	61.90%
754.03	2,403	3,199	163	23	364	28	6	112	6,298	3,895	61.85%
1106.07	1,315	1,074	91	21	789	15	15	114	3,434	2,119	61.71%
741.06	2,088	2,341	156	11	672	32	6	132	5,438	3,350	61.60%
755.13	1,809	1,731	205	23	744	30	9	118	4,669	2,860	61.26%
992.27	2,362	1,265	128	10	2,082	25	15	175	6,062	3,700	61.04%
880.01	1,835	1,409	58	15	1,213	42	6	126	4,704	2,869	60.99%
754.04	2,406	3,074	164	25	313	28	10	123	6,143	3,737	60.83%
881.06	1,748	1,238	73	13	1,207	52	1	118	4,450	2,702	60.72%
881.05	1,540	1,035	38	10	1,193	13	5	82	3,916	2,376	60.67%
1102.02	3,055	2,169	353	29	1,810	54	21	266	7,757	4,702	60.62%
636.04	1,575	2,187	38	5	107	4	5	62	3,983	2,408	60.46%
117.12	1,875	2,003	95	19	580	5	11	99	4,687	2,812	60.00%
11.03	1,788	2,348	69	12	148	7	8	80	4,460	2,672	59.91%
626.14	4,648	1,199	253	10	4,929	12	69	419	11,539	6,891	59.72%
525.15	2,785	432	99	3	3,151	12	26	381	6,889	4,104	59.57%
992.22	1,908	655	25	4	1,934	16	12	117	4,671	2,763	59.15%
870.02	2,774	2,185	259	22	1,113	38	7	316	6,714	3,940	58.68%
758.11	1,383	1,674	20	6	176	4	3	45	3,311	1,928	58.23%
871.03	3,188	2,472	144	30	1,541	33	25	198	7,631	4,443	58.22%
877.04	1,983	1,580	82	16	933	15	9	116	4,734	2,751	58.11%
884.01	2,061	1,660	37	10	1,011	31	3	90	4,903	2,842	57.96%
882.03	1,962	1,245	125	14	1,160	16	6	120	4,648	2,686	57.79%
868.03	3,078	1,869	480	28	1,515	24	12	278	7,284	4,206	57.74%
639.04	2,125	1,840	30	21	704	186	7	96	5,009	2,884	57.58%
883.01	2,544	2,012	61	30	1,154	43	2	145	5,991	3,447	57.54%
864.07	2,530	2,445	229	8	589	18	7	131	5,957	3,427	57.53%
115.02	1,725	1,557	102	24	480	14	6	99	4,007	2,282	56.95%
755.07	2,328	1,789	252	26	733	22	21	201	5,372	3,044	56.66%
421.07	1,969	2,328	46	22	75	4	5	87	4,536	2,567	56.59%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
637.02	2,435	2,668	59	20	263	21	6	120	5,592	3,157	56.46%
19.03	1,307	1,056	78	15	458	8	6	70	2,998	1,691	56.40%
992.26	1,716	350	32	5	1,664	22	13	123	3,925	2,209	56.28%
1103.01	2,951	1,328	306	42	1,810	28	22	238	6,725	3,774	56.12%
878.01	2,146	1,773	126	28	556	28	13	220	4,890	2,744	56.11%
1101.02	2,468	767	171	13	1,985	13	18	171	5,606	3,138	55.98%
758.16	1,581	1,322	127	9	402	9	3	124	3,577	1,996	55.80%
1106.04	3,237	983	225	16	2,493	8	9	263	7,234	3,997	55.25%
999.02	2,077	1,329	52	19	987	23	8	143	4,638	2,561	55.22%
881.04	2,072	1,286	80	30	987	24	15	119	4,613	2,541	55.08%
880.02	1,594	780	48	12	970	21	9	110	3,544	1,950	55.02%
111.01	1,796	1,700	83	11	308	4	5	65	3,972	2,176	54.78%
1103.04	2,213	880	92	18	1,465	22	4	170	4,864	2,651	54.50%
877.01	2,235	1,382	113	13	997	16	3	123	4,882	2,647	54.22%
114.03	2,589	2,530	83	27	297	12	7	110	5,655	3,066	54.22%
882.01	1,687	1,240	40	18	605	3	3	65	3,661	1,974	53.92%
117.16	1,916	885	67	11	1,172	4	4	72	4,131	2,215	53.62%
14.01	2,607	2,659	92	9	137	7	12	81	5,604	2,997	53.48%
14.02	2,426	2,342	72	13	189	13	28	112	5,195	2,769	53.30%
863.03	2,125	1,518	126	23	615	15	7	117	4,546	2,421	53.26%
1102.01	3,277	1,801	325	29	1,332	28	19	195	7,006	3,729	53.23%
863.04	2,135	1,716	96	20	448	6	1	110	4,532	2,397	52.89%
863.06	1,690	1,158	96	15	472	15	4	120	3,570	1,880	52.66%
525.27	3,646	595	123	11	2,962	3	14	327	7,681	4,035	52.53%
525.22	1,928	222	44	3	1,633	8	13	204	4,055	2,127	52.45%
758.07	2,219	1,905	44	17	364	4	5	82	4,640	2,421	52.18%
882.02	1,377	679	45	15	665	16	1	71	2,869	1,492	52.00%
19.01	1,298	1,011	43	3	272	12	8	56	2,703	1,405	51.98%
1103.03	2,339	1,020	186	14	1,125	22	5	151	4,862	2,523	51.89%
992.51	2,496	981	105	24	1,357	23	17	184	5,187	2,691	51.88%
626.11	1,810	335	76	4	1,296	11	10	197	3,739	1,929	51.59%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
758.12	3,225	2,815	94	21	359	13	6	118	6,651	3,426	51.51%
525.21	2,214	491	185	8	1,373	7	7	254	4,539	2,325	51.22%
760.00	4,269	3,250	217	37	774	25	17	163	8,752	4,483	51.22%
869.02	2,409	1,197	202	18	866	63	7	159	4,921	2,512	51.05%
1101.10	2,804	1,602	194	22	857	50	15	160	5,704	2,900	50.84%
1104.01	2,294	1,434	115	20	644	22	6	99	4,634	2,340	50.50%
759.01	2,213	1,979	61	14	101	13	7	73	4,461	2,248	50.39%
868.01	1,545	847	70	5	552	19	4	72	3,114	1,569	50.39%
17.05	2,168	1,497	71	6	496	8	1	112	4,359	2,191	50.26%
19.02	1,463	944	72	13	344	12	16	63	2,927	1,464	50.02%
524.20	3,723	438	49	3	2,889	5	5	326	7,438	3,715	49.95%
525.23	2,061	273	48	4	1,510	4	18	172	4,090	2,029	49.61%
639.06	3,429	2,646	109	18	339	42	18	176	6,777	3,348	49.40%
626.27	1,599	234	23	4	1,158	7	4	124	3,153	1,554	49.29%
15.04	2,262	1,766	36	16	251	6	1	121	4,459	2,197	49.27%
115.04	2,710	943	291	25	1,114	21	14	217	5,335	2,625	49.20%
639.03	2,072	1,123	45	7	678	30	7	116	4,078	2,006	49.19%
754.01	1,803	1,549	46	15	73	3	3	46	3,538	1,735	49.04%
524.11	2,621	1,773	68	7	499	13	1	150	5,132	2,511	48.93%
17.04	1,493	252	43	7	1,018	5	6	66	2,890	1,397	48.34%
524.18	1,559	339	108	6	812	3	2	162	2,991	1,432	47.88%
758.06	3,044	2,127	81	29	398	17	3	140	5,839	2,795	47.87%
17.08	1,995	521	20	4	1,190	3	15	73	3,821	1,826	47.79%
997.03	2,421	561	54	15	1,419	9	2	133	4,614	2,193	47.53%
320.14	3,227	2,191	56	20	489	19	13	123	6,138	2,911	47.43%
883.02	2,750	1,101	72	14	1,188	18	16	71	5,230	2,480	47.42%
992.42	1,984	979	35	18	628	6	1	106	3,757	1,773	47.19%
755.05	1,856	1,161	95	21	257	20	15	88	3,513	1,657	47.17%
994.11	3,006	1,656	93	19	643	23	10	165	5,615	2,609	46.46%
1103.13	1,314	410	37	6	571	6	5	88	2,437	1,123	46.08%
762.05	3,377	2,203	77	29	347	15	5	175	6,228	2,851	45.78%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
525.05	2,769	617	73	10	1,439	12	9	171	5,100	2,331	45.71%
218.21	2,857	1,302	138	32	775	10	12	132	5,258	2,401	45.66%
11.02	1,683	1,098	50	17	170	3	4	62	3,087	1,404	45.48%
881.01	1,190	584	48	8	261	13	12	51	2,167	977	45.09%
1101.04	3,197	900	231	26	1,236	20	10	145	5,765	2,568	44.54%
639.08	3,156	1,053	158	24	1,035	16	12	235	5,689	2,533	44.52%
753.03	1,913	1,299	55	6	108	5	3	41	3,430	1,517	44.23%
863.05	2,085	978	40	10	520	8	1	88	3,730	1,645	44.10%
525.26	2,458	478	46	3	1,259	6	3	141	4,394	1,936	44.06%
320.27	3,546	1,839	73	19	643	15	9	180	6,324	2,778	43.93%
219.14	2,376	1,456	62	9	240	3	2	78	4,226	1,850	43.78%
639.02	3,776	1,666	116	9	892	44	19	166	6,688	2,912	43.54%
759.02	3,865	2,339	147	22	287	23	13	129	6,825	2,960	43.37%
13.01	3,518	2,123	105	20	300	12	11	94	6,183	2,665	43.10%
320.22	3,580	2,016	132	23	356	11	3	170	6,291	2,711	43.09%
757.01	3,671	2,088	150	18	373	3	6	133	6,442	2,771	43.01%
1101.09	2,669	668	122	21	1,032	10	27	131	4,680	2,011	42.97%
117.08	2,519	895	140	15	649	16	8	164	4,406	1,887	42.83%
219.24	2,511	491	97	4	1,123	0	6	158	4,390	1,879	42.80%
992.41	2,455	641	55	17	976	3	11	120	4,278	1,823	42.61%
741.07	2,598	1,128	122	14	498	24	7	135	4,526	1,928	42.60%
219.13	2,281	900	79	6	546	19	4	130	3,965	1,684	42.47%
525.25	4,383	529	70	12	2,334	5	12	272	7,617	3,234	42.46%
992.24	1,965	291	27	11	1,006	29	2	83	3,414	1,449	42.44%
994.10	2,438	829	80	28	646	32	7	174	4,234	1,796	42.42%
758.05	2,336	1,347	45	28	198	19	7	59	4,039	1,703	42.16%
1101.11	3,058	957	157	29	914	20	4	126	5,265	2,207	41.92%
992.12	2,952	1,122	64	26	721	19	9	148	5,061	2,109	41.67%
992.25	1,973	240	27	4	1,005	14	5	107	3,375	1,402	41.54%
1102.23	3,200	1,087	138	28	797	23	5	175	5,453	2,253	41.32%
525.17	2,838	369	100	5	1,249	7	25	224	4,817	1,979	41.08%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
626.10	885	141	38	5	245	1	9	171	1,495	610	40.80%
992.29	3,396	721	76	24	1,260	15	9	218	5,719	2,323	40.62%
525.24	4,232	723	177	7	1,550	8	10	312	7,019	2,787	39.71%
110.00	3,926	1,596	129	23	680	14	4	130	6,502	2,576	39.62%
1101.07	3,479	785	247	11	1,019	14	14	152	5,721	2,242	39.19%
626.28	2,056	166	75	7	951	3	10	106	3,374	1,318	39.06%
626.25	2,912	1,470	56	7	248	1	2	67	4,763	1,851	38.86%
762.05	3,487	1,526	100	23	350	41	9	153	5,689	2,202	38.71%
525.28	2,087	236	46	2	887	1	1	140	3,400	1,313	38.62%
525.19	2,585	403	73	7	869	10	8	235	4,190	1,605	38.31%
992.50	1,821	312	49	19	619	4	11	115	2,950	1,129	38.27%
11.01	2,654	1,349	64	16	119	1	4	89	4,296	1,642	38.22%
626.41	2,167	935	63	11	239	2	11	75	3,503	1,336	38.14%
1100.14	2,904	816	222	15	533	25	11	147	4,673	1,769	37.86%
15.03	3,169	1,552	51	6	209	11	4	86	5,088	1,919	37.72%
423.13	4,501	2,363	52	24	138	11	7	127	7,223	2,722	37.69%
219.18	3,128	1,127	57	8	591	4	2	92	5,009	1,881	37.55%
758.14	2,188	218	27	5	957	4	7	94	3,500	1,312	37.49%
755.04	2,553	1,027	66	17	262	7	17	122	4,071	1,518	37.29%
112.00	2,504	1,084	40	21	247	4	12	79	3,991	1,487	37.26%
524.19	1,759	161	23	6	769	7	3	74	2,802	1,043	37.22%
1100.10	2,887	512	54	12	953	18	10	148	4,594	1,707	37.16%
754.05	1,691	748	55	11	117	6	4	54	2,686	995	37.04%
219.23	3,705	635	137	5	1,174	10	12	186	5,864	2,159	36.82%
423.10	5,497	2,758	40	59	127	14	11	174	8,680	3,183	36.67%
320.55	2,680	966	64	15	343	9	13	133	4,223	1,543	36.54%
525.14	3,358	373	60	8	1,229	9	7	246	5,290	1,932	36.52%
758.13	3,269	933	31	20	762	3	1	120	5,139	1,870	36.39%
219.22	2,916	538	75	14	872	5	11	150	4,581	1,665	36.35%
992.33	2,131	259	7	8	794	9	6	133	3,347	1,216	36.33%
524.17	3,686	383	50	5	1,469	10	16	149	5,768	2,082	36.10%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
423.07	4,821	1,564	101	25	766	8	16	209	7,510	2,689	35.81%
525.02	3,738	895	92	13	907	6	11	157	5,819	2,081	35.76%
992.34	1,962	269	21	11	657	2	8	104	3,034	1,072	35.33%
320.28	2,054	646	42	7	275	7	7	128	3,166	1,112	35.12%
219.21	2,942	411	70	5	952	8	13	119	4,520	1,578	34.91%
638.07	3,439	903	177	1	570	7	7	133	5,237	1,798	34.33%
1101.14	3,179	782	74	19	582	11	9	181	4,837	1,658	34.28%
638.03	3,057	1,288	29	24	124	15	7	106	4,650	1,593	34.26%
758.15	3,228	1,168	50	9	322	4	4	125	4,910	1,682	34.26%
218.20	2,772	490	60	13	775	3	12	84	4,209	1,437	34.14%
756.07	3,747	509	75	9	1,152	10	9	172	5,683	1,936	34.07%
524.10	3,365	1,018	73	16	460	13	7	146	5,098	1,733	33.99%
1101.08	1,828	509	70	7	286	5	1	60	2,766	938	33.91%
524.23	3,337	812	140	14	555	10	11	168	5,047	1,710	33.88%
639.07	3,352	571	96	2	779	26	13	229	5,068	1,716	33.86%
993.05	4,926	1,887	42	44	350	23	10	158	7,440	2,514	33.79%
762.01	3,608	1,124	96	13	424	26	12	145	5,448	1,840	33.77%
524.16	2,701	848	56	23	327	1	2	116	4,074	1,373	33.70%
15.07	2,846	752	86	16	431	4	23	132	4,290	1,444	33.66%
996.02	2,140	495	35	13	394	11	13	110	3,211	1,071	33.35%
218.28	3,136	365	98	13	929	1	6	157	4,705	1,569	33.35%
423.20	3,703	1,008	94	15	524	13	18	170	5,545	1,842	33.22%
218.12	4,353	1,121	150	18	669	10	25	159	6,505	2,152	33.08%
524.24	3,234	780	125	6	476	13	11	180	4,825	1,591	32.97%
219.15	2,732	383	53	10	758	3	5	130	4,074	1,342	32.94%
994.13	5,091	1,046	68	41	1,091	22	9	215	7,583	2,492	32.86%
525.13	3,922	433	55	14	1,219	10	2	174	5,829	1,907	32.72%
626.36	2,489	563	112	16	394	6	15	103	3,698	1,209	32.69%
999.05	2,208	559	40	19	344	9	2	91	3,272	1,064	32.52%
1101.06	2,440	542	58	13	414	31	13	100	3,611	1,171	32.43%
524.27	3,459	545	74	13	780	11	7	215	5,104	1,645	32.23%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
320.51	3,112	910	123	20	282	9	15	120	4,591	1,479	32.22%
113.00	2,556	787	57	19	236	4	2	98	3,759	1,203	32.00%
423.30	4,347	1,174	121	8	490	2	5	241	6,388	2,041	31.95%
524.25	3,926	743	134	15	773	4	11	149	5,755	1,829	31.78%
762.06	3,039	1,111	33	18	175	4	9	59	4,448	1,409	31.68%
636.01	2,510	875	20	24	104	21	2	106	3,662	1,152	31.46%
626.12	4,963	427	58	1	1,473	11	17	251	7,201	2,238	31.08%
15.05	4,440	1,034	78	20	694	14	3	149	6,432	1,992	30.97%
218.14	4,833	857	123	27	973	2	12	170	6,997	2,164	30.93%
15.06	2,987	589	38	12	551	14	3	125	4,319	1,332	30.84%
1100.11	1,905	234	31	12	476	12	2	76	2,748	843	30.68%
218.27	2,431	322	74	6	571	1	7	92	3,504	1,073	30.62%
755.06	2,254	513	61	11	338	4	8	58	3,247	993	30.58%
524.26	3,247	533	73	8	630	17	8	153	4,669	1,422	30.46%
996.05	2,590	396	30	3	582	8	1	113	3,723	1,133	30.43%
218.26	1,789	323	50	5	291	4	9	98	2,569	780	30.36%
421.08	4,133	1,450	45	37	93	14	11	151	5,934	1,801	30.35%
992.15	3,805	892	39	25	500	19	12	167	5,459	1,654	30.30%
999.06	3,338	524	41	26	640	12	9	198	4,788	1,450	30.28%
525.20	2,452	190	18	3	739	3	8	104	3,517	1,065	30.28%
996.03	4,362	744	55	28	895	15	7	147	6,253	1,891	30.24%
626.39	4,369	736	142	16	701	10	7	260	6,241	1,872	30.00%
762.08	3,347	896	62	15	333	9	6	105	4,773	1,426	29.88%
320.29	3,267	668	91	5	439	13	20	143	4,646	1,379	29.68%
423.34	3,687	723	56	13	547	2	17	191	5,236	1,549	29.58%
992.31	4,010	392	33	10	1,080	7	2	159	5,693	1,683	29.56%
626.21	3,481	689	90	8	495	13	17	147	4,940	1,459	29.53%
320.15	4,746	967	115	12	691	10	17	172	6,730	1,984	29.48%
992.46	2,676	253	28	11	689	10	5	111	3,783	1,107	29.26%
218.29	3,820	332	64	9	1,067	2	5	93	5,392	1,572	29.15%
219.05	3,696	697	97	14	597	4	3	108	5,216	1,520	29.14%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
626.38	3,114	447	97	15	540	11	4	161	4,389	1,275	29.05%
117.07	3,119	551	66	14	492	7	16	114	4,379	1,260	28.77%
320.39	4,944	1,038	55	9	644	15	5	226	6,936	1,992	28.72%
114.01	1,519	387	37	12	117	6	5	45	2,128	609	28.62%
992.32	3,888	390	26	11	915	17	14	181	5,442	1,554	28.56%
320.33	2,522	461	66	5	308	19	6	142	3,529	1,007	28.53%
423.35	2,698	448	65	11	356	17	11	169	3,775	1,077	28.53%
1101.01	3,250	583	64	13	496	15	5	120	4,546	1,296	28.51%
320.54	3,313	746	113	22	272	10	6	146	4,628	1,315	28.41%
218.07	2,737	682	57	16	235	3	5	87	3,822	1,085	28.39%
994.05	3,173	606	37	13	432	10	18	138	4,427	1,254	28.33%
525.11	4,218	298	44	7	1,110	1	22	178	5,878	1,660	28.24%
524.21	3,853	327	57	4	968	3	11	139	5,362	1,509	28.14%
14.03	2,354	675	10	12	124	18	4	75	3,272	918	28.06%
626.35	2,976	461	57	14	465	7	16	135	4,131	1,155	27.96%
320.56	3,892	654	88	15	545	3	7	195	5,399	1,507	27.91%
626.29	1,949	82	4	6	574	0	2	78	2,695	746	27.68%
320.38	5,048	536	98	10	1,045	19	16	204	6,976	1,928	27.64%
626.37	2,029	310	67	2	216	9	9	151	2,793	764	27.35%
117.15	4,157	620	60	17	721	9	8	119	5,711	1,554	27.21%
756.05	4,323	480	28	15	965	7	5	100	5,923	1,600	27.01%
320.50	3,758	720	74	18	361	26	16	170	5,143	1,385	26.93%
994.06	3,248	517	53	6	500	9	9	93	4,435	1,187	26.76%
626.40	2,606	376	54	14	353	17	7	121	3,548	942	26.55%
15.01	4,224	786	51	16	545	22	3	100	5,747	1,523	26.50%
626.34	4,104	455	76	9	723	4	9	198	5,578	1,474	26.43%
423.31	4,016	795	52	8	397	10	8	172	5,458	1,442	26.42%
219.20	3,929	422	64	14	769	6	9	125	5,338	1,409	26.40%
219.19	2,037	306	27	6	289	3	11	88	2,767	730	26.38%
320.47	2,295	435	64	16	196	4	0	106	3,116	821	26.35%
992.30	3,246	355	34	27	569	16	18	139	4,404	1,158	26.29%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
218.23	2,363	351	39	5	323	4	11	109	3,205	842	26.27%
16.01	5,037	850	70	17	698	9	13	130	6,824	1,787	26.19%
524.22	3,008	406	109	3	441	8	10	88	4,073	1,065	26.15%
992.38	3,032	243	23	17	603	13	5	167	4,103	1,071	26.10%
992.35	3,465	621	34	25	398	5	4	134	4,686	1,221	26.06%
996.04	2,762	351	28	31	432	7	1	123	3,735	973	26.05%
631.01	2,094	432	49	22	171	7	1	55	2,831	737	26.03%
995.08	3,450	847	26	20	168	16	14	120	4,661	1,211	25.98%
218.25	2,495	304	38	8	436	0	13	76	3,370	875	25.96%
115.03	1,317	236	17	4	156	5	2	40	1,777	460	25.89%
1100.03	2,361	353	19	11	324	7	2	98	3,175	814	25.64%
626.33	2,715	309	63	4	420	8	12	117	3,648	933	25.58%
16.02	3,200	356	40	3	581	1	13	98	4,292	1,092	25.44%
218.02	4,878	1,119	52	19	301	5	30	134	6,538	1,660	25.39%
117.18	2,516	397	48	18	277	9	1	95	3,361	845	25.14%
525.06	1,901	136	26	4	383	7	8	73	2,538	637	25.10%
423.39	2,612	643	38	11	100	12	4	57	3,477	865	24.88%
117.10	2,654	401	43	3	358	3	4	60	3,526	872	24.73%
639.05	3,200	544	56	22	290	8	4	118	4,242	1,042	24.56%
992.16	3,076	460	28	21	360	8	2	121	4,076	1,000	24.53%
320.31	2,852	478	31	12	283	0	6	107	3,769	917	24.33%
218.24	2,199	259	14	5	385	7	11	25	2,905	706	24.30%
17.06	2,814	211	33	3	586	4	1	64	3,716	902	24.27%
756.06	4,734	404	45	16	906	4	9	125	6,243	1,509	24.17%
219.16	2,878	186	51	4	555	2	7	101	3,784	906	23.94%
423.33	3,398	240	33	9	606	4	25	151	4,466	1,068	23.91%
320.48	4,489	641	94	7	499	3	8	146	5,887	1,398	23.75%
994.16	3,502	580	44	19	296	7	2	142	4,592	1,090	23.74%
1100.12	3,726	316	65	5	648	11	9	96	4,876	1,150	23.58%
992.45	2,345	290	29	11	291	7	11	83	3,067	722	23.54%
320.49	6,175	733	167	16	737	16	21	211	8,076	1,901	23.54%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
626.31	2,712	85	8	0	613	2	4	117	3,541	829	23.41%
320.53	6,004	900	135	29	518	12	6	235	7,839	1,835	23.41%
320.34	4,919	473	86	14	696	1	8	224	6,421	1,502	23.39%
423.29	3,492	602	38	17	287	6	8	108	4,558	1,066	23.39%
218.10	2,822	493	40	17	228	5	6	70	3,681	859	23.34%
423.27	3,912	387	67	18	528	8	12	158	5,090	1,178	23.14%
423.36	3,507	366	33	7	476	6	22	144	4,561	1,054	23.11%
422.05	5,104	1,153	31	13	200	1	5	130	6,637	1,533	23.10%
626.30	1,272	58	8	1	278	1	5	30	1,653	381	23.05%
994.12	3,596	503	53	10	362	16	18	112	4,670	1,074	23.00%
320.20	4,631	745	52	11	374	8	21	167	6,009	1,378	22.93%
423.26	3,232	465	113	7	228	4	5	138	4,192	960	22.90%
992.39	3,099	243	20	16	517	11	8	99	4,013	914	22.78%
320.30	2,957	456	26	9	260	5	4	110	3,827	870	22.73%
758.10	2,379	197	26	9	419	1	8	39	3,078	699	22.71%
1100.05	2,443	313	26	10	257	5	5	100	3,159	716	22.67%
992.37	2,727	316	15	10	358	4	5	89	3,524	797	22.62%
218.17	2,845	428	53	2	235	10	13	87	3,673	828	22.54%
992.14	2,654	359	29	11	277	6	8	82	3,426	772	22.53%
1100.04	3,611	450	30	23	424	7	21	95	4,661	1,050	22.53%
632.02	2,722	595	11	16	72	7	10	77	3,510	788	22.45%
218.30	4,563	460	36	13	676	0	14	114	5,876	1,313	22.35%
626.43	2,622	134	6	4	508	0	2	93	3,369	747	22.17%
756.04	5,902	501	38	9	937	7	24	163	7,581	1,679	22.15%
626.47	3,281	510	39	7	297	1	0	71	4,206	925	21.99%
320.02	4,806	717	62	23	370	9	7	163	6,157	1,351	21.94%
423.15	4,635	657	87	18	358	7	18	153	5,933	1,298	21.88%
993.08	3,764	254	27	10	697	0	7	59	4,818	1,054	21.88%
638.02	2,261	354	16	11	147	11	10	84	2,894	633	21.87%
320.45	2,278	333	21	5	169	4	9	96	2,915	637	21.85%
524.28	4,998	641	101	14	425	8	13	191	6,391	1,393	21.80%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
1100.15	2,766	409	45	9	191	5	4	107	3,536	770	21.78%
756.03	3,011	429	43	7	194	7	20	137	3,848	837	21.75%
994.08	2,494	350	18	15	211	8	5	83	3,184	690	21.67%
117.09	3,450	451	34	14	357	5	4	84	4,399	949	21.57%
524.08	5,003	537	62	10	568	5	9	180	6,374	1,371	21.51%
758.09	2,468	194	8	12	376	1	4	67	3,130	662	21.15%
638.06	2,889	411	26	17	185	18	12	98	3,656	767	20.98%
117.17	2,129	304	48	5	146	0	0	61	2,693	564	20.94%
421.14	2,953	558	31	14	121	6	1	50	3,734	781	20.92%
218.22	2,958	343	45	14	250	6	9	110	3,735	777	20.80%
320.41	855	152	11	7	34	1	3	16	1,079	224	20.76%
423.11	4,559	837	29	23	174	3	11	117	5,753	1,194	20.75%
757.02	2,576	391	15	4	191	7	2	61	3,247	671	20.67%
758.08	2,564	455	19	4	115	3	3	63	3,226	662	20.52%
423.19	2,769	190	20	6	424	0	2	71	3,482	713	20.48%
320.36	2,897	424	22	9	206	1	3	80	3,642	745	20.46%
994.17	3,155	316	34	9	338	5	3	99	3,959	804	20.31%
422.01	4,664	908	29	27	115	2	12	95	5,852	1,188	20.30%
994.15	4,380	300	9	10	619	4	2	170	5,494	1,114	20.28%
218.15	2,478	328	24	7	208	2	4	55	3,106	628	20.22%
992.40	4,127	415	26	18	395	19	12	150	5,162	1,035	20.05%
994.04	3,777	432	28	19	322	6	12	127	4,723	946	20.03%
993.10	3,603	420	20	36	228	11	4	170	4,492	889	19.79%
994.07	1,999	197	17	18	174	5	1	80	2,491	492	19.75%
423.25	2,901	263	31	1	320	3	6	90	3,615	714	19.75%
992.20	4,354	559	31	19	232	14	9	203	5,421	1,067	19.68%
993.06	4,767	641	24	37	255	12	24	171	5,931	1,164	19.63%
320.32	2,653	342	11	12	204	9	4	65	3,300	647	19.61%
219.12	2,706	176	15	4	379	2	0	78	3,360	654	19.46%
636.02	2,910	401	32	16	148	10	12	82	3,611	701	19.41%
524.15	3,315	324	65	7	296	7	7	88	4,109	794	19.32%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
114.02	1,839	239	15	2	121	2	11	48	2,277	438	19.24%
992.43	3,319	359	19	14	296	2	2	95	4,106	787	19.17%
320.42	4,961	582	57	16	327	16	9	167	6,135	1,174	19.14%
631.02	5,087	752	51	27	215	18	8	131	6,289	1,202	19.11%
423.37	3,121	241	39	4	331	4	7	88	3,835	714	18.62%
638.05	1,896	212	27	8	121	9	4	52	2,329	433	18.59%
993.07	1,940	221	27	15	116	10	3	45	2,377	437	18.38%
993.11	3,127	376	12	18	144	15	8	118	3,818	691	18.10%
995.12	2,266	260	25	6	128	7	7	67	2,766	500	18.08%
218.09	2,144	257	15	10	139	0	4	47	2,616	472	18.04%
320.12	3,032	350	43	9	184	3	11	63	3,695	663	17.94%
757.03	3,271	285	16	8	327	1	0	78	3,986	715	17.94%
421.09	4,128	462	55	17	232	12	2	118	5,026	898	17.87%
633.01	2,506	316	33	11	88	11	19	65	3,049	543	17.81%
219.17	2,770	261	18	8	252	0	5	52	3,366	596	17.71%
320.03	4,103	531	22	2	209	13	2	97	4,979	876	17.59%
1100.06	2,389	197	27	10	196	2	10	67	2,898	509	17.56%
626.45	3,987	166	19	11	546	4	8	83	4,824	837	17.35%
218.16	4,090	488	34	11	228	4	8	80	4,943	853	17.26%
1100.08	3,564	310	57	8	237	6	11	111	4,304	740	17.19%
995.14	4,826	290	23	5	538	5	22	112	5,821	995	17.09%
992.17	2,034	172	14	8	161	1	1	50	2,441	407	16.67%
320.40	2,409	205	9	5	213	1	1	47	2,890	481	16.64%
421.12	3,139	343	26	8	152	9	10	75	3,762	623	16.56%
320.23	2,285	318	7	15	58	2	7	43	2,735	450	16.45%
626.05	2,842	356	23	17	64	3	6	85	3,396	554	16.31%
320.13	2,959	293	39	9	137	14	4	73	3,528	569	16.13%
421.03	6,345	878	32	16	91	3	13	152	7,530	1,185	15.74%
320.35	2,057	138	28	10	116	3	7	68	2,427	370	15.25%
423.28	2,036	88	19	5	207	3	0	42	2,400	364	15.17%
1100.07	4,031	314	18	11	256	3	3	91	4,727	696	14.72%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
320.43	3,659	174	28	2	274	0	7	143	4,287	628	14.65%
993.09	3,043	259	14	12	156	6	3	72	3,565	522	14.64%
636.03	5,362	511	69	20	191	12	5	93	6,263	901	14.39%
995.13	2,005	148	7	10	124	3	5	39	2,341	336	14.35%
423.32	4,784	302	43	5	333	5	8	102	5,582	798	14.30%
995.11	2,929	259	12	18	126	3	1	68	3,416	487	14.26%
422.03	6,374	633	45	14	207	10	4	126	7,413	1,039	14.02%
423.38	4,147	365	26	10	158	1	6	101	4,814	667	13.86%
423.17	3,125	204	23	6	191	1	16	57	3,623	498	13.75%
320.46	3,527	228	34	2	215	12	0	68	4,086	559	13.68%
421.13	3,875	340	6	20	146	7	7	82	4,483	608	13.56%
633.02	3,452	341	13	10	77	9	9	75	3,986	534	13.40%
630.10	5,632	391	32	15	309	2	24	90	6,495	863	13.29%
995.06	1,106	82	1	3	25	0	16	34	1,267	161	12.71%
320.52	2,908	231	11	6	120	5	3	46	3,330	422	12.67%
320.44	5,293	307	37	10	279	2	16	112	6,056	763	12.60%
626.44	5,737	278	39	11	398	6	6	83	6,558	821	12.52%
995.04	2,198	144	5	5	88	4	0	67	2,511	313	12.47%
626.32	3,555	262	31	10	104	3	9	84	4,058	503	12.40%
630.09	1,466	62	6	1	96	2	1	37	1,671	205	12.27%
992.44	3,377	187	12	19	178	2	3	68	3,846	469	12.19%
421.11	5,190	412	39	12	151	4	0	96	5,904	714	12.09%
630.07	5,214	234	31	4	352	4	2	87	5,928	714	12.04%
631.03	2,262	166	17	8	48	7	7	45	2,560	298	11.64%
423.23	4,168	305	40	20	74	2	25	83	4,717	549	11.64%
423.24	3,767	182	34	3	176	0	8	87	4,257	490	11.51%
635.00	5,480	373	35	10	169	11	8	105	6,191	711	11.48%
626.42	2,876	106	5	2	205	5	10	34	3,243	367	11.32%
630.08	770	25	7	1	45	1	1	18	868	98	11.29%
626.20	4,506	325	30	14	98	3	5	97	5,078	572	11.26%
626.22	3,776	249	28	7	128	1	4	38	4,231	455	10.75%

Population by Race/Ethnicity for Census Tracts in Orange County

Source: Census 2000 Summary File 1 (SF 1), Table P4, Hispanic or Latino, and not Hispanic or Latino by Race

Census Tract	White alone	Hispanic or Latino	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Population of two or more races	Total Population	Total Minority Population	Percent Minority
422.06	2,702	189	24	8	55	1	5	40	3,024	322	10.65%
626.04	3,714	254	17	15	73	1	3	74	4,151	437	10.53%
320.11	1,580	92	9	12	16	4	6	43	1,762	182	10.33%
630.04	5,029	211	20	6	231	9	11	85	5,602	573	10.23%
628.00	4,269	266	28	13	66	12	10	68	4,732	463	9.78%
320.37	3,987	149	22	8	189	0	3	38	4,396	409	9.30%
423.05	3,457	170	23	5	60	2	4	61	3,782	325	8.59%
626.19	3,664	193	19	5	50	7	9	60	4,007	343	8.56%
627.02	4,293	203	18	8	92	3	8	59	4,684	391	8.35%
995.10	3,874	160	16	9	111	0	0	47	4,217	343	8.13%
630.05	1,356	24	15	0	63	0	0	18	1,476	120	8.13%
626.23	5,916	247	53	8	161	1	2	47	6,435	519	8.07%
627.10	2,684	104	7	7	70	7	3	31	2,913	229	7.86%
421.06	1,395	68	5	2	20	1	3	14	1,508	113	7.49%
634.00	4,627	202	13	17	77	3	1	55	4,995	368	7.37%
626.46	3,394	98	8	2	110	2	2	27	3,643	249	6.84%
630.06	2,907	99	13	6	66	2	0	27	3,120	213	6.83%
995.09	3,450	112	17	5	86	2	0	17	3,689	239	6.48%
629.00	1,704	58	2	5	13	1	3	14	1,800	96	5.33%



Technical Appendix C

Low Income Population by Census Tract and Block Group

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Brea city	021815	1	7	7	100.0
Fullerton city	011708	3	17	17	100.0
Fullerton city	086701	3	125	125	100.0
Garden Grove city	089001	1	21	21	100.0
Los Alamitos city	110113	1	141	141	100.0
Newport Beach city	063101	1	8	8	100.0
Placentia city	021813	9	20	20	100.0
Westminster city	088901	1	15	15	100.0
Westminster city	099701	3	25	25	100.0
	001903	2	61	61	100.0
	021924	1	33	33	100.0
Buena Park city	001801	1	295	296	99.7
Santa Ana city	074601	2	1668	1708	97.7
Santa Ana city	074501	3	996	1022	97.5
Anaheim city	088402	1	768	790	97.2
	001201	3	257	269	95.5
Garden Grove city	087806	2	96	101	95.0
Anaheim city	087501	3	1294	1363	94.9
Garden Grove city	089104	2	3469	3656	94.9
Anaheim city	011720	1	1463	1556	94.0
Santa Ana city	074405	1	1517	1614	94.0
Santa Ana city	074901	1	2075	2225	93.3
Santa Ana city	074901	3	1960	2107	93.0
Santa Ana city	074902	3	2765	2983	92.7
Garden Grove city	089106	2	1435	1549	92.6
Santa Ana city	074406	3	1540	1669	92.3
Santa Ana city	075003	2	3282	3569	92.0
Irvine city	062626	2	1191	1306	91.2
Stanton city	087803	3	3319	3638	91.2
Orange city	075811	2	1354	1490	90.9
Santa Ana city	074501	2	2435	2679	90.9
Santa Ana city	075100	4	1896	2086	90.9
Irvine city	062627	2	687	758	90.6
Santa Ana city	074601	3	1347	1492	90.3
Santa Ana city	074407	1	3442	3822	90.1
Santa Ana city	074403	2	2699	3002	89.9
Fullerton city	011504	2	447	498	89.8
Santa Ana city	074805	1	4183	4670	89.6
Stanton city	087806	1	1653	1846	89.5
Santa Ana city	074405	2	1761	1973	89.3
Anaheim city	086405	2	1706	1923	88.7
Fullerton city	011601	5	814	919	88.6
Stanton city	087902	2	1126	1271	88.6
Anaheim city	087501	2	1868	2116	88.3
Westminster city	099601	3	1668	1889	88.3
Westminster city	099803	1	1743	1977	88.2
Buena Park city	001801	4	119	135	88.1
Santa Ana city	075004	2	2292	2603	88.1
Anaheim city	086601	1	2126	2424	87.7
Garden Grove city	088701	1	1201	1369	87.7
Santa Ana city	075003	3	2116	2412	87.7

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Santa Ana city	075002	3	4171	4777	87.3
Anaheim city	086502	4	1881	2158	87.2
Santa Ana city	074405	3	1636	1884	86.8
Garden Grove city	088501	2	1917	2213	86.6
Santa Ana city	074806	1	2843	3288	86.5
Anaheim city	087102	3	1240	1440	86.1
Fullerton city	001802	5	1159	1346	86.1
Anaheim city	087403	2	1176	1367	86.0
Anaheim city	087404	1	2349	2739	85.8
Laguna Woods city	062641	2	204	238	85.7
Santa Ana city	074405	4	1110	1295	85.7
Huntington Beach city	099402	4	2047	2395	85.5
Buena Park city	110402	3	1573	1841	85.4
Santa Ana city	089105	2	2122	2488	85.3
Huntington Beach city	099402	3	3038	3571	85.1
Anaheim city	087405	3	2895	3407	85.0
Santa Ana city	074901	4	1430	1682	85.0
Santa Ana city	089105	3	2499	2948	84.8
Santa Ana city	074403	1	2857	3372	84.7
Santa Ana city	074602	3	1948	2302	84.6
Anaheim city	087405	1	1496	1770	84.5
Fullerton city	011711	5	1934	2290	84.5
Santa Ana city	089105	1	1314	1555	84.5
Santa Ana city	099249	1	2143	2539	84.4
Anaheim city	087200	3	1117	1327	84.2
Placentia city	011720	1	1836	2184	84.1
Santa Ana city	074501	1	2257	2685	84.1
Santa Ana city	074602	1	1055	1255	84.1
Santa Ana city	076000	2	121	144	84.0
Anaheim city	087504	3	1743	2081	83.8
Orange city	075812	1	2640	3157	83.6
Santa Ana city	074802	3	2259	2703	83.6
Fullerton city	011101	3	567	682	83.1
Anaheim city	011720	3	492	593	83.0
Anaheim city	110402	2	581	700	83.0
Laguna Woods city	062622	5	44	53	83.0
Anaheim city	087503	5	1984	2397	82.8
Santa Ana city	074801	2	1625	1962	82.8
Anaheim city	086502	3	1116	1349	82.7
Anaheim city	087601	1	1604	1939	82.7
Santa Ana city	075004	1	2573	3110	82.7
Santa Ana city	074801	1	1413	1711	82.6
Westminster city	099903	2	2173	2634	82.5
Anaheim city	087102	4	488	592	82.4
Fullerton city	011601	6	1579	1916	82.4
Garden Grove city	088502	3	1480	1797	82.4
Santa Ana city	075002	2	1749	2122	82.4
Santa Ana city	074602	2	1906	2320	82.2
Santa Ana city	075100	1	2313	2825	81.9
Anaheim city	086502	1	1082	1325	81.7
Anaheim city	087300	3	926	1133	81.7

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Anaheim city	087504	2	2398	2941	81.5
Orange city	075807	3	1069	1313	81.4
Anaheim city	011602	2	385	474	81.2
Anaheim city	086601	5	1262	1556	81.1
Santa Ana city	075003	1	1800	2219	81.1
Santa Ana city	075002	1	2080	2567	81.0
Santa Ana city	099248	1	2067	2557	80.8
Garden Grove city	088203	2	1320	1643	80.3
Anaheim city	086602	2	1685	2100	80.2
Fullerton city	011200	2	631	787	80.2
Fullerton city	011403	4	687	860	79.9
Santa Ana city	074601	1	1390	1740	79.9
Santa Ana city	074902	2	1695	2122	79.9
Anaheim city	087300	1	1591	1993	79.8
Westminster city	099904	4	995	1252	79.5
Anaheim city	087504	1	1245	1568	79.4
Fullerton city	011504	5	1116	1405	79.4
Laguna Woods city	062646	2	532	670	79.4
Santa Ana city	074701	1	1989	2504	79.4
Anaheim city	087300	5	1060	1337	79.3
Santa Ana city	074406	2	879	1108	79.3
Irvine city	062614	2	2342	2966	79.0
La Habra city	001202	3	795	1008	78.9
Santa Ana city	074502	2	2546	3225	78.9
Anaheim city	086901	3	3110	3945	78.8
Buena Park city	110500	1	2120	2692	78.8
Seal Beach city	099509	1	375	476	78.8
Buena Park city	110603	3	1742	2218	78.5
Santa Ana city	074806	2	2237	2848	78.5
Buena Park city	110606	1	2289	2918	78.4
Anaheim city	087405	2	1098	1403	78.3
Fullerton city	011101	1	372	475	78.3
Santa Ana city	074003	1	1758	2253	78.0
Fullerton city	011601	1	921	1183	77.9
Santa Ana city	074901	5	1763	2265	77.8
Santa Ana city	074802	2	987	1270	77.7
Santa Ana city	074902	1	1662	2138	77.7
Anaheim city	087701	2	430	554	77.6
Anaheim city	011602	1	1454	1879	77.4
Placentia city	011720	2	1958	2531	77.4
Anaheim city	087503	1	741	959	77.3
La Habra city	001201	2	1403	1814	77.3
Placentia city	011721	4	1669	2158	77.3
Cypress city	110104	3	799	1035	77.2
Westminster city	099904	5	1357	1758	77.2
Santa Ana city	074108	1	1462	1896	77.1
Orange city	075813	2	892	1161	76.8
Stanton city	088105	1	43	56	76.8
Anaheim city	086502	2	1409	1837	76.7
Santa Ana city	074406	1	713	929	76.7
Anaheim city	086903	1	1700	2220	76.6

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
La Habra city	001201	3	1310	1712	76.5
Santa Ana city	074602	4	1749	2287	76.5
Laguna Woods city	062646	1	427	559	76.4
Orange city	075806	4	1799	2359	76.3
Santa Ana city	089004	2	2767	3633	76.2
Anaheim city	087403	1	524	689	76.1
Fullerton city	011601	2	890	1170	76.1
Anaheim city	087001	1	2204	2900	76.0
Laguna Woods city	062622	3	662	872	75.9
Fullerton city	001802	4	929	1226	75.8
Santa Ana city	074803	1	3064	4041	75.8
Santa Ana city	074004	2	529	700	75.6
Anaheim city	086901	4	986	1308	75.4
La Habra city	001304	3	402	533	75.4
La Habra city	001404	2	783	1039	75.4
Santa Ana city	074801	3	1865	2474	75.4
Fullerton city	011401	1	477	634	75.2
	021913	4	2144	2850	75.2
Santa Ana city	074103	3	1582	2107	75.1
La Habra city	001401	4	1196	1595	75.0
Santa Ana city	074005	3	1075	1433	75.0
La Habra city	001304	2	1510	2015	74.9
Santa Ana city	089104	1	739	987	74.9
Anaheim city	086501	1	1705	2280	74.8
Garden Grove city	088601	4	846	1131	74.8
Santa Ana city	074300	1	1696	2266	74.8
Anaheim city	087401	1	339	454	74.7
Huntington Beach city	099214	4	566	758	74.7
Orange city	076204	2	1678	2253	74.5
Placentia city	011721	1	830	1116	74.4
Westminster city	099802	2	2104	2829	74.4
Anaheim city	087806	1	1050	1413	74.3
Anaheim city	110202	3	1488	2006	74.2
Lake Forest city	032014	1	1462	1970	74.2
Seal Beach city	099509	4	703	950	74.0
Anaheim city	087803	1	1094	1481	73.9
Santa Ana city	089004	3	1433	1938	73.9
Stanton city	087806	2	181	245	73.9
Anaheim city	087106	3	1174	1591	73.8
Santa Ana city	074702	1	2655	3600	73.8
Anaheim city	087601	3	989	1343	73.6
Dana Point city	042201	1	572	777	73.6
Anaheim city	011722	1	706	961	73.5
Rancho Santa Margarita city	032055	2	863	1174	73.5
Santa Ana city	075100	2	1107	1507	73.5
Fullerton city	110605	2	798	1089	73.3
Westminster city	099904	2	1435	1959	73.3
La Habra city	001404	3	854	1166	73.2
Tustin Foothills CDP	075701	4	115	157	73.2
Santa Ana city	074802	1	1396	1910	73.1
Anaheim city	086903	2	1015	1390	73.0

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Anaheim city	087200	2	1621	2225	72.9
Fullerton city	011712	2	363	498	72.9
Anaheim city	087504	4	1202	1652	72.8
Santa Ana city	075201	2	1719	2364	72.7
Anaheim city	086702	2	595	819	72.6
Irvine city	062611	1	530	730	72.6
	099227	2	283	390	72.6
Garden Grove city	088601	2	1000	1382	72.4
Garden Grove city	088702	1	1023	1413	72.4
Seal Beach city	099510	3	594	821	72.4
Santa Ana city	074109	2	1445	1998	72.3
Stanton city	087803	2	793	1097	72.3
Fullerton city	011502	1	635	879	72.2
Westminster city	099203	1	281	390	72.1
Anaheim city	086601	4	1214	1687	72.0
Westminster city	099802	1	836	1161	72.0
Seal Beach city	099510	5	501	697	71.9
Orange city	075902	3	1363	1898	71.8
Seal Beach city	099502	1	483	673	71.8
Seal Beach city	099510	2	1168	1627	71.8
Cypress city	110110	1	602	840	71.7
Orange city	076102	3	1556	2171	71.7
Santa Ana city	075202	2	2359	3291	71.7
Laguna Hills city	062623	2	141	197	71.6
La Habra city	001201	1	1123	1573	71.4
Santa Ana city	074701	2	2115	2966	71.3
Anaheim city	086601	3	1576	2214	71.2
Buena Park city	110603	5	1358	1907	71.2
Santa Ana city	074200	1	849	1192	71.2
Santa Ana city	075701	2	1246	1749	71.2
	032056	4	47	66	71.2
Garden Grove city	088801	2	624	878	71.1
Westminster city	088901	4	248	349	71.1
Anaheim city	087503	4	373	525	71.0
Garden Grove city	088701	2	1400	1972	71.0
Santa Ana city	089004	1	1313	1852	70.9
Fullerton city	011300	1	776	1096	70.8
Anaheim city	086405	3	1343	1899	70.7
Santa Ana city	074701	3	2539	3596	70.6
Anaheim city	086802	2	1355	1924	70.4
Santa Ana city	074901	2	1284	1823	70.4
	021918	3	528	750	70.4
Buena Park city	110603	4	717	1020	70.3
Anaheim city	086702	4	302	430	70.2
Anaheim city	087103	3	970	1383	70.1
Garden Grove city	088702	2	614	876	70.1
Laguna Woods city	062646	4	568	810	70.1
Laguna Hills city	062625	4	1224	1750	69.9
Garden Grove city	089102	1	1826	2617	69.8
Stanton city	087805	3	1837	2637	69.7
	099702	2	901	1293	69.7

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Fullerton city	001801	2	1052	1512	69.6
Westminster city	099601	1	1381	1985	69.6
Fullerton city	011000	4	984	1416	69.5
Santa Ana city	074006	1	867	1248	69.5
Anaheim city	086702	5	2027	2921	69.4
La Habra city	001501	1	177	255	69.4
Garden Grove city	088902	1	1105	1594	69.3
Santa Ana city	075202	1	1893	2734	69.2
Santa Ana city	075302	1	1392	2013	69.2
Stanton city	088106	3	2098	3033	69.2
La Habra city	001303	2	687	994	69.1
Laguna Woods city	062647	2	405	586	69.1
Santa Ana city	099248	2	2091	3025	69.1
	086701	3	288	417	69.1
Anaheim city	086902	1	871	1262	69.0
Garden Grove city	076103	2	2598	3771	68.9
Santa Ana city	074803	2	2070	3003	68.9
Santa Ana city	075403	2	855	1241	68.9
Santa Ana city	074005	2	1679	2442	68.8
Westminster city	088904	2	953	1388	68.7
Fullerton city	001802	1	1088	1586	68.6
Anaheim city	086407	3	1417	2068	68.5
La Habra city	001202	1	912	1331	68.5
Laguna Woods city	062646	3	554	809	68.5
Laguna Woods city	062647	3	214	313	68.4
Santa Ana city	074102	1	1317	1926	68.4
Santa Ana city	074805	2	1394	2040	68.3
Santa Ana city	074102	3	649	951	68.2
Santa Ana city	088903	3	1156	1695	68.2
	087701	3	135	198	68.2
Garden Grove city	088201	1	898	1318	68.1
La Habra city	001202	2	623	915	68.1
Anaheim city	087805	1	1086	1598	68.0
Orange city	076101	3	1217	1793	67.9
Placentia city	011722	2	359	529	67.9
Anaheim city	086901	1	1136	1676	67.8
Santa Ana city	099249	2	1289	1904	67.7
Santa Ana city	075302	3	635	942	67.4
Santa Ana city	089001	2	953	1413	67.4
Stanton city	087803	1	152	226	67.3
Santa Ana city	099247	2	1442	2147	67.2
Huntington Beach city	099413	4	982	1464	67.1
Santa Ana city	099202	2	2540	3783	67.1
Santa Ana city	074803	3	1341	2002	67.0
Garden Grove city	089003	1	1202	1796	66.9
Stanton city	087902	3	1583	2366	66.9
Orange city	076000	5	937	1402	66.8
Orange city	076103	1	813	1217	66.8
Los Alamitos city	110117	4	46	69	66.7
	001501	3	16	24	66.7
Anaheim city	086404	2	1017	1527	66.6

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Anaheim city	087103	4	1113	1672	66.6
Buena Park city	110607	2	711	1067	66.6
Garden Grove city	088301	1	1530	2299	66.6
Santa Ana city	074005	1	1247	1872	66.6
Santa Ana city	074601	4	1281	1924	66.6
Garden Grove city	088107	2	2400	3608	66.5
Seal Beach city	099509	5	461	693	66.5
Westminster city	099223	2	902	1357	66.5
Fullerton city	011602	2	675	1016	66.4
Buena Park city	110500	2	2105	3173	66.3
Anaheim city	086803	1	1209	1827	66.2
Anaheim city	110202	2	730	1103	66.2
Fullerton city	001801	1	1090	1647	66.2
Garden Grove city	088901	3	1516	2293	66.1
Garden Grove city	089106	1	1359	2056	66.1
Laguna Woods city	062622	2	479	725	66.1
Villa Park city	075812	2	39	59	66.1
Garden Grove city	088402	2	1441	2182	66.0
La Habra city	001304	1	922	1397	66.0
Santa Ana city	089001	3	1524	2309	66.0
Irvine city	062626	1	960	1456	65.9
Laguna Woods city	062625	1	496	754	65.8
Garden Grove city	088702	3	2068	3148	65.7
Santa Ana city	074300	2	1408	2143	65.7
Anaheim city	086501	2	999	1522	65.6
Garden Grove city	088801	5	1053	1605	65.6
La Habra city	001303	1	1179	1798	65.6
Westminster city	099222	1	512	782	65.5
Fullerton city	011502	4	697	1067	65.3
Anaheim city	087300	2	2546	3908	65.1
Laguna Beach city	062605	2	385	591	65.1
Santa Ana city	075201	1	2328	3584	65.0
Orange city	021913	4	731	1126	64.9
Westminster city	099905	1	1293	1996	64.8
Anaheim city	087101	1	1356	2096	64.7
Fullerton city	011708	1	1438	2224	64.7
Garden Grove city	088801	4	1415	2190	64.6
Fullerton city	011504	3	424	658	64.4
Anaheim city	087102	1	978	1520	64.3
Garden Grove city	088801	3	1201	1869	64.3
Laguna Woods city	062647	4	615	956	64.3
Dana Point city	042313	5	1210	1886	64.2
Anaheim city	087105	1	1100	1715	64.1
Orange city	076204	1	1882	2934	64.1
Santa Ana city	074200	4	1859	2898	64.1
Anaheim city	086405	1	790	1234	64.0
Anaheim city	087002	2	1054	1646	64.0
Buena Park city	110603	2	992	1549	64.0
Rancho Santa Margarita city	032051	4	579	905	64.0
Santa Ana city	074006	3	1774	2773	64.0
Westminster city	099601	2	1622	2533	64.0

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Fullerton city	011602	3	1528	2393	63.9
Anaheim city	076202	4	1072	1680	63.8
Brea city	001504	1	750	1175	63.8
Fullerton city	011504	4	572	896	63.8
Irvine city	062612	3	461	723	63.8
La Palma city	110116	3	918	1442	63.7
Los Alamitos city	110106	2	35	55	63.6
Santa Ana city	075404	3	1532	2409	63.6
Stanton city	087802	4	954	1499	63.6
	075701	3	279	439	63.6
Anaheim city	087704	1	658	1036	63.5
Lake Forest city	052410	5	498	784	63.5
Santa Ana city	074103	2	934	1471	63.5
	099702	3	1342	2112	63.5
Santa Ana city	074004	1	1550	2444	63.4
Anaheim city	087101	2	809	1278	63.3
Buena Park city	110500	3	1053	1664	63.3
Fullerton city	011403	2	1092	1725	63.3
Garden Grove city	088601	3	1361	2151	63.3
Garden Grove city	088104	1	84	133	63.2
Irvine city	052505	4	321	508	63.2
Anaheim city	086301	1	1635	2593	63.1
Anaheim city	086306	1	937	1486	63.1
Fullerton city	011711	2	952	1508	63.1
Anaheim city	086303	4	1228	1953	62.9
Huntington Beach city	099410	3	1466	2329	62.9
Huntington Beach city	099411	4	930	1479	62.9
Orange city	076102	1	127	202	62.9
Anaheim city	086405	4	993	1582	62.8
Anaheim city	086404	1	1873	2987	62.7
Anaheim city	086803	3	1719	2742	62.7
Orange city	076201	2	723	1155	62.6
Huntington Beach city	099402	2	1362	2180	62.5
Seal Beach city	099509	3	412	659	62.5
Santa Ana city	074109	1	1262	2022	62.4
	087703	1	1190	1908	62.4
Huntington Beach city	099305	4	1418	2276	62.3
Lake Forest city	032027	1	316	507	62.3
Anaheim city	087403	3	1000	1607	62.2
Anaheim city	110202	1	804	1293	62.2
Stanton city	087805	1	834	1342	62.1
Santa Ana city	075301	1	927	1496	62.0
Stanton city	087901	1	2024	3266	62.0
Orange city	076208	4	589	952	61.9
Anaheim city	086602	3	1526	2470	61.8
Orange city	075901	3	1723	2790	61.8
Fullerton city	011711	4	836	1354	61.7
Anaheim city	086802	1	1403	2283	61.5
Garden Grove city	088602	1	1367	2230	61.3
Garden Grove city	088001	3	931	1522	61.2
Irvine city	052514	1	729	1192	61.2

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Seal Beach city	099510	1	312	511	61.1
Orange city	075816	1	1335	2187	61.0
Anaheim city	086402	1	1738	2856	60.9
Orange city	076101	1	1179	1938	60.8
Anaheim city	021812	4	1044	1722	60.6
Anaheim city	087002	3	1715	2831	60.6
Garden Grove city	088104	2	361	596	60.6
Santa Ana city	074200	2	1227	2026	60.6
Santa Ana city	074702	2	1865	3077	60.6
Laguna Woods city	062623	1	403	666	60.5
Seal Beach city	099509	2	437	722	60.5
Cypress city	110111	3	1079	1786	60.4
Anaheim city	110201	1	359	595	60.3
Anaheim city	086406	1	562	934	60.2
Laguna Hills city	042307	4	701	1165	60.2
	087902	1	950	1582	60.1
Anaheim city	086406	2	767	1279	60.0
Garden Grove city	089003	2	1208	2012	60.0
	076204	1	42	70	60.0
Anaheim city	087602	3	2067	3456	59.8
Anaheim city	087701	3	921	1540	59.8
Fullerton city	011708	2	781	1306	59.8
La Habra city	001301	5	1060	1774	59.8
Westminster city	099204	1	834	1394	59.8
Orange city	075902	2	1261	2112	59.7
	099701	3	818	1370	59.7
Santa Ana city	074106	1	1310	2197	59.6
Buena Park city	110201	3	1567	2637	59.4
Garden Grove city	088903	3	885	1490	59.4
Garden Grove city	088802	1	1005	1696	59.3
Westminster city	099902	3	1129	1907	59.2
Stanton city	087802	1	251	425	59.1
Irvine city	052418	2	847	1435	59.0
Laguna Hills city	062622	5	715	1211	59.0
Stanton city	087801	2	1238	2100	59.0
Westminster city	099801	2	1454	2465	59.0
Anaheim city	086404	3	997	1693	58.9
Anaheim city	086601	2	1030	1749	58.9
Fullerton city	011711	3	531	902	58.9
Garden Grove city	089107	1	538	913	58.9
Garden Grove city	088501	3	956	1626	58.8
Rancho Santa Margarita city	032054	3	354	603	58.7
Santa Ana city	089001	4	1355	2307	58.7
Anaheim city	086602	1	896	1529	58.6
Brea city	001503	3	1018	1741	58.5
Laguna Woods city	062646	5	447	764	58.5
Santa Ana city	075302	2	941	1609	58.5
Santa Ana city	089104	3	834	1429	58.4
Buena Park city	110500	4	519	890	58.3
Buena Park city	110603	1	1060	1817	58.3
Laguna Woods city	062622	1	396	679	58.3

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Lake Forest city	032047	1	589	1010	58.3
Anaheim city	086702	1	824	1415	58.2
Anaheim city	087802	1	813	1396	58.2
Garden Grove city	088403	1	331	570	58.1
Garden Grove city	076103	3	1959	3382	57.9
Santa Ana city	099202	3	774	1337	57.9
Santa Ana city	074501	4	1067	1847	57.8
Garden Grove city	099203	1	697	1207	57.7
Santa Ana city	099247	1	608	1054	57.7
Cypress city	110110	2	749	1300	57.6
Garden Grove city	088106	3	811	1409	57.6
Santa Ana city	075403	3	1262	2192	57.6
La Habra city	001103	3	991	1722	57.5
Santa Ana city	074502	1	1756	3055	57.5
Seal Beach city	099510	4	203	353	57.5
Stanton city	087801	1	451	785	57.5
Anaheim city	087401	4	540	940	57.4
Irvine city	052421	5	304	530	57.4
Anaheim city	011714	1	126	220	57.3
Anaheim city	076102	1	591	1031	57.3
Santa Ana city	075701	3	566	988	57.3
Fullerton city	001802	3	770	1346	57.2
Irvine city	052417	2	450	787	57.2
Anaheim city	087106	1	641	1122	57.1
Garden Grove city	088802	2	1403	2459	57.1
Rancho Santa Margarita city	032051	3	322	564	57.1
Santa Ana city	075301	4	385	674	57.1
Irvine city	075515	3	312	547	57.0
Santa Ana city	074200	3	1980	3476	57.0
Orange city	021914	2	694	1220	56.9
Garden Grove city	088107	1	1161	2044	56.8
Cypress city	110202	1	165	291	56.7
Fullerton city	011200	3	802	1418	56.6
Garden Grove city	088401	3	668	1183	56.5
Huntington Beach city	099241	2	922	1636	56.4
Garden Grove city	089102	3	1041	1848	56.3
Huntington Beach city	099508	3	744	1322	56.3
Santa Ana city	075504	1	583	1035	56.3
Stanton city	088104	2	846	1503	56.3
Anaheim city	086803	2	623	1109	56.2
Anaheim city	087300	4	899	1601	56.2
Placentia city	011711	1	453	806	56.2
Anaheim city	087401	3	402	717	56.1
Santa Ana city	074111	3	1827	3260	56.0
Fullerton city	001903	1	810	1450	55.9
Garden Grove city	088901	4	744	1331	55.9
Garden Grove city	088903	2	1680	3004	55.9
Anaheim city	086501	3	525	941	55.8
Fullerton city	001601	1	608	1093	55.6
La Habra city	001103	2	800	1439	55.6
Anaheim city	087801	1	622	1121	55.5

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Buena Park city	110110	1	269	485	55.5
Fountain Valley city	099229	3	909	1637	55.5
Santa Ana city	074602	5	824	1485	55.5
Huntington Beach city	099212	4	625	1130	55.3
Buena Park city	110302	1	766	1387	55.2
Garden Grove city	088701	3	1194	2162	55.2
Garden Grove city	088801	1	892	1616	55.2
La Habra city	001301	4	575	1041	55.2
La Palma city	110301	4	858	1553	55.2
Brea city	001504	3	362	657	55.1
Fullerton city	011601	4	663	1203	55.1
Santa Ana city	074006	2	825	1501	55.0
Santa Ana city	074601	5	1054	1917	55.0
Anaheim city	087106	2	1114	2028	54.9
Anaheim city	087704	3	636	1158	54.9
Anaheim city	011722	2	449	819	54.8
Anaheim city	087102	2	1263	2306	54.8
Cypress city	110102	3	707	1290	54.8
Westminster city	099222	2	867	1581	54.8
Anaheim city	087001	3	709	1296	54.7
Huntington Beach city	099220	5	736	1348	54.6
Fullerton city	001801	4	441	809	54.5
Anaheim city	086902	2	864	1588	54.4
Fullerton city	011102	2	558	1028	54.3
Buena Park city	110606	2	1043	1923	54.2
Laguna Woods city	062625	2	509	940	54.1
Westminster city	088905	2	1350	2495	54.1
	087806	1	33	61	54.1
Fountain Valley city	099251	1	1212	2246	54.0
Huntington Beach city	099212	1	758	1403	54.0
La Habra city	001103	1	569	1054	54.0
Westminster city	099803	2	806	1492	54.0
	099701	1	1180	2188	53.9
Garden Grove city	088902	3	701	1302	53.8
Stanton city	110203	1	29	54	53.7
Anaheim city	086701	1	2159	4028	53.6
Buena Park city	110607	3	739	1379	53.6
Garden Grove city	088301	4	366	683	53.6
Irvine city	052505	2	446	832	53.6
Westminster city	099223	1	1158	2160	53.6
Fullerton city	001903	2	793	1483	53.5
Anaheim city	087200	5	1026	1923	53.4
Garden Grove city	088602	2	1202	2249	53.4
La Habra city	001401	3	627	1174	53.4
Fountain Valley city	099251	2	937	1759	53.3
Garden Grove city	088403	2	1488	2793	53.3
Stanton city	087802	2	1017	1907	53.3
Westminster city	099801	3	897	1682	53.3
Fullerton city	011601	3	997	1873	53.2
Irvine city	062611	2	885	1662	53.2
Santa Ana city	074102	2	1044	1965	53.1

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Anaheim city	110402	3	551	1039	53.0
Irvine city	052521	2	651	1229	53.0
Placentia city	011712	1	1141	2152	53.0
Placentia city	011721	3	507	957	53.0
Anaheim city	086301	3	1333	2525	52.8
Placentia city	011712	2	644	1220	52.8
Westminster city	099904	1	422	801	52.7
Brea city	001507	1	830	1579	52.6
Anaheim city	086701	4	754	1436	52.5
Huntington Beach city	099244	2	917	1747	52.5
Stanton city	088104	1	1094	2085	52.5
Westminster city	099902	1	560	1073	52.2
Fullerton city	001902	1	601	1156	52.0
Laguna Hills city	042307	5	638	1226	52.0
Santa Ana city	075404	1	1045	2008	52.0
Garden Grove city	088901	2	645	1242	51.9
Placentia city	011720	3	348	671	51.9
Garden Grove city	088302	1	624	1204	51.8
Laguna Woods city	062641	1	331	639	51.8
Los Alamitos city	110014	2	736	1420	51.8
Westminster city	099204	2	495	955	51.8
Garden Grove city	088903	1	1200	2322	51.7
Westminster city	099903	3	596	1156	51.6
Fullerton city	001802	2	934	1813	51.5
Huntington Beach city	099411	2	953	1851	51.5
Santa Ana city	074106	3	631	1225	51.5
Garden Grove city	088902	2	1106	2158	51.3
Fullerton city	011403	5	631	1232	51.2
Orange city	076205	1	1485	2901	51.2
Garden Grove city	088501	1	1395	2737	51.0
Buena Park city	110302	4	692	1361	50.8
Santa Ana city	074108	2	1711	3369	50.8
Fullerton city	001902	2	756	1491	50.7
Fullerton city	011502	2	381	752	50.7
	099703	1	232	458	50.7
La Habra city	001404	1	606	1198	50.6
Laguna Woods city	062623	4	419	828	50.6
Anaheim city	087002	1	1128	2232	50.5
Garden Grove city	088402	1	923	1829	50.5
Anaheim city	087704	2	497	987	50.4
Lake Forest city	052423	2	1088	2158	50.4
Garden Grove city	088901	1	636	1265	50.3
	099701	2	516	1025	50.3
Buena Park city	110401	3	678	1356	50.0
Irvine city	052410	5	19	38	50.0
La Habra city	001401	1	715	1429	50.0
Lake Forest city	032014	2	1817	3631	50.0
Santa Ana city	075301	3	887	1775	50.0
Seal Beach city	099511	2	253	506	50.0
Anaheim city	087404	2	518	1039	49.9
Huntington Beach city	099306	3	563	1129	49.9

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Irvine city	052528	4	380	762	49.9
Huntington Beach city	099307	1	444	892	49.8
Los Alamitos city	110014	4	539	1083	49.8
Stanton city	087802	3	746	1498	49.8
Anaheim city	086304	3	1000	2014	49.7
Anaheim city	087503	2	1043	2098	49.7
Newport Beach city	063103	2	74	149	49.7
Santa Ana city	075405	1	801	1612	49.7
Huntington Beach city	099305	2	516	1042	49.5
Lake Forest city	052425	3	766	1550	49.4
Santa Ana city	074103	1	791	1600	49.4
Anaheim city	086801	3	460	933	49.3
Garden Grove city	089107	2	1090	2209	49.3
Buena Park city	110202	3	383	779	49.2
Fountain Valley city	099203	2	420	858	49.0
Garden Grove city	088001	2	865	1765	49.0
Orange city	076000	1	625	1276	49.0
	062641	2	892	1821	49.0
Anaheim city	086406	4	418	854	48.9
La Habra city	001402	2	986	2016	48.9
Anaheim city	087401	2	461	945	48.8
Orange city	075805	1	605	1241	48.8
Anaheim city	086901	2	566	1162	48.7
Anaheim city	087602	2	680	1395	48.7
Garden Grove city	088502	2	530	1088	48.7
Orange city	076208	1	812	1670	48.6
Los Alamitos city	110015	9	100	206	48.5
Fullerton city	001704	3	333	689	48.3
Huntington Beach city	099220	1	255	528	48.3
Santa Ana city	089102	2	1079	2236	48.3
Buena Park city	110302	2	1203	2497	48.2
La Habra city	001101	2	281	583	48.2
La Habra city	001402	3	980	2033	48.2
	087806	2	833	1728	48.2
Dana Point city	042339	3	597	1240	48.1
	063103	2	174	362	48.1
Brea city	001506	1	1000	2087	47.9
Fullerton city	011403	3	474	990	47.9
Fullerton city	011101	4	579	1211	47.8
Santa Ana city	074102	4	1198	2508	47.8
Cypress city	110117	1	947	1985	47.7
Orange city	076202	3	862	1809	47.7
Santa Ana city	075404	2	812	1707	47.6
Anaheim city	086407	2	751	1581	47.5
Los Alamitos city	110108	3	308	649	47.5
Anaheim city	086702	3	493	1039	47.4
Huntington Beach city	099412	1	882	1860	47.4
Westminster city	099204	3	712	1503	47.4
Anaheim city	021807	1	934	1973	47.3
Fullerton city	110605	3	613	1298	47.2
Garden Grove city	088301	2	886	1884	47.0

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Westminster city	099702	1	1189	2535	46.9
Fullerton city	011000	2	470	1004	46.8
Huntington Beach city	099405	3	939	2005	46.8
La Habra city	001102	1	415	887	46.8
Westminster city	088905	3	598	1277	46.8
	087703	2	759	1625	46.7
Anaheim city	087103	1	750	1608	46.6
Huntington Beach city	099212	3	606	1301	46.6
Anaheim city	086303	2	351	757	46.4
Buena Park city	001801	3	333	717	46.4
Buena Park city	110604	3	1278	2762	46.3
Garden Grove city	088601	1	421	912	46.2
Los Alamitos city	110108	2	340	737	46.1
Buena Park city	110303	1	1109	2412	46.0
Irvine city	052525	7	658	1430	46.0
Irvine city	062627	3	433	942	46.0
Santa Ana city	074111	2	672	1461	46.0
Huntington Beach city	099411	3	693	1509	45.9
Cypress city	110109	2	488	1065	45.8
Garden Grove city	088502	1	917	2010	45.6
Rancho Santa Margarita city	032055	1	313	686	45.6
Anaheim city	088403	1	1420	3118	45.5
Orange city	075815	2	711	1563	45.5
Anaheim city	087103	6	322	711	45.3
Fountain Valley city	099227	2	1449	3201	45.3
Anaheim city	086304	2	401	889	45.1
Laguna Woods city	062623	3	587	1304	45.0
Santa Ana city	089001	1	682	1514	45.0
Brea city	001504	4	525	1169	44.9
Fullerton city	011707	1	618	1375	44.9
Garden Grove city	088002	2	886	1972	44.9
Garden Grove city	088201	2	556	1238	44.9
Huntington Beach city	099215	1	1666	3708	44.9
Santa Ana city	099203	1	691	1539	44.9
Huntington Beach city	099508	4	402	897	44.8
Huntington Beach city	099305	3	733	1640	44.7
Orange city	076000	3	699	1569	44.6
Anaheim city	110203	1	1067	2397	44.5
Rancho Santa Margarita city	032054	2	276	620	44.5
Aliso Viejo CDP	042320	4	858	1931	44.4
Anaheim city	087703	4	225	507	44.4
Laguna Woods city	062623	5	263	592	44.4
Santa Ana city	074107	1	375	845	44.4
Anaheim city	086701	3	487	1099	44.3
Irvine city	052513	5	457	1032	44.3
La Habra city	001705	1	1020	2303	44.3
Orange city	021918	3	200	452	44.2
Anaheim city	086701	2	571	1296	44.1
Laguna Hills city	042320	2	180	408	44.1
Orange city	076205	4	317	720	44.0
Orange city	076206	1	1253	2850	44.0

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Santa Ana city	089107	1	1129	2568	44.0
Fullerton city	011707	3	752	1713	43.9
Santa Ana city	099202	1	893	2038	43.8
Garden Grove city	088203	1	952	2184	43.6
Santa Ana city	075405	2	404	927	43.6
Alico Viejo CDP	062634	3	134	308	43.5
Anaheim city	087602	4	452	1040	43.5
Fullerton city	011102	3	391	899	43.5
Westminster city	099803	3	823	1894	43.5
Fullerton city	011102	4	525	1211	43.4
La Habra city	001303	4	722	1665	43.4
Los Alamitos city	110014	3	547	1261	43.4
Anaheim city	087503	3	266	614	43.3
Lake Forest city	052411	1	893	2060	43.3
Westminster city	088905	1	523	1208	43.3
Stanton city	088101	1	933	2158	43.2
Westminster city	099904	3	424	982	43.2
	076202	2	137	317	43.2
Anaheim city	086301	2	758	1759	43.1
Anaheim city	086406	3	408	946	43.1
Anaheim city	086801	1	191	443	43.1
Cypress city	110111	1	602	1398	43.1
Dana Point city	042313	2	401	931	43.1
Laguna Hills city	062647	1	557	1293	43.1
Fullerton city	011504	1	503	1170	43.0
Huntington Beach city	099216	4	309	721	42.9
Anaheim city	086903	3	388	907	42.8
Garden Grove city	088802	3	565	1320	42.8
Laguna Beach city	062605	1	378	883	42.8
Westminster city	099222	3	559	1307	42.8
Fullerton city	011300	3	553	1296	42.7
Dana Point city	042313	6	438	1029	42.6
Stanton city	087801	3	348	817	42.6
Garden Grove city	110001	2	707	1667	42.4
La Habra city	001303	3	548	1293	42.4
Dana Point city	042201	5	383	905	42.3
Huntington Beach city	099305	1	1051	2482	42.3
Huntington Beach city	099307	2	533	1259	42.3
Irvine city	052520	1	173	409	42.3
Lake Forest city	052424	1	703	1660	42.3
Westminster city	099703	1	578	1367	42.3
	001101	3	63	149	42.3
Anaheim city	086803	4	286	677	42.2
Anaheim city	087105	2	1159	2746	42.2
Fullerton city	011403	1	273	647	42.2
	076208	3	38	90	42.2
Cypress city	110106	2	451	1071	42.1
Orange city	075805	3	597	1417	42.1
Orange city	076205	3	289	687	42.1
Anaheim city	087501	4	230	548	42.0
Huntington Beach city	099306	2	536	1281	41.8

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Placentia city	011711	2	110	263	41.8
Cypress city	110117	3	487	1169	41.7
Buena Park city	110201	2	841	2023	41.6
Cypress city	110109	4	707	1704	41.5
Garden Grove city	088302	3	629	1521	41.4
Garden Grove city	088401	2	943	2280	41.4
Westminster city	099222	4	407	984	41.4
Brea city	001504	2	602	1458	41.3
Fullerton city	011000	3	481	1165	41.3
La Habra city	001102	3	528	1277	41.3
Orange city	075902	5	303	733	41.3
Huntington Beach city	099408	1	776	1883	41.2
Tustin Foothills CDP	075504	2	259	629	41.2
Buena Park city	110110	2	449	1093	41.1
Fullerton city	011101	2	649	1579	41.1
	075808	2	309	752	41.1
Buena Park city	110401	1	593	1445	41.0
Garden Grove city	087902	1	48	117	41.0
Santa Ana city	074107	2	1028	2516	40.9
Westminster city	088904	1	421	1030	40.9
Brea city	001505	2	766	1879	40.8
Garden Grove city	088401	1	582	1425	40.8
Buena Park city	110402	1	468	1149	40.7
La Palma city	110115	1	382	941	40.6
Anaheim city	086402	2	431	1064	40.5
Los Alamitos city	110015	1	593	1465	40.5
Newport Beach city	063500	1	156	385	40.5
Yorba Linda city	021802	5	598	1476	40.5
	063101	1	973	2404	40.5
Buena Park city	110302	3	270	669	40.4
Orange city	075902	4	161	399	40.4
	062604	3	295	730	40.4
Huntington Beach city	099235	3	727	1805	40.3
Buena Park city	110604	2	557	1386	40.2
Irvine city	062627	1	543	1350	40.2
Anaheim city	087601	2	433	1081	40.1
Fountain Valley city	099233	2	672	1674	40.1
Orange city	075806	3	318	794	40.1
Placentia city	011715	1	407	1016	40.1
Brea city	021815	2	261	652	40.0
Placentia city	011717	1	517	1294	40.0
Anaheim city	086903	4	593	1485	39.9
Huntington Beach city	099416	3	401	1006	39.9
Newport Beach city	063603	1	1127	2822	39.9
Santa Ana city	074106	2	780	1956	39.9
Westminster city	099801	1	493	1236	39.9
	099513	1	121	303	39.9
Fullerton city	011102	1	531	1335	39.8
	021816	1	304	764	39.8
	087101	1	284	713	39.8
Buena Park city	110607	1	389	980	39.7

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Garden Grove city	087602	2	112	282	39.7
Lake Forest city	052411	2	693	1747	39.7
Rancho Santa Margarita city	032042	2	395	994	39.7
Anaheim city	087701	1	459	1161	39.5
Santa Ana city	074004	4	883	2236	39.5
La Habra city	001301	1	342	871	39.3
Buena Park city	110301	3	593	1511	39.2
Cypress city	110104	1	1021	2603	39.2
Orange city	075902	1	374	955	39.2
Tustin Foothills CDP	075603	3	382	974	39.2
Buena Park city	086801	2	361	923	39.1
Dana Point city	042201	2	611	1564	39.1
Fullerton city	011502	3	497	1273	39.0
Irvine city	052519	3	281	720	39.0
Irvine city	052519	4	510	1307	39.0
Santa Ana city	075303	2	908	2326	39.0
Westminster city	099603	1	514	1318	39.0
Anaheim city	086305	2	687	1768	38.9
Dana Point city	042313	3	610	1569	38.9
Garden Grove city	088105	1	976	2506	38.9
Laguna Woods city	062623	7	339	872	38.9
	087703	3	530	1362	38.9
Dana Point city	042313	1	481	1239	38.8
Rancho Santa Margarita city	032053	3	662	1708	38.8
Anaheim city	087601	4	264	682	38.7
Anaheim city	087704	4	592	1529	38.7
Dana Point city	042205	4	357	923	38.7
Newport Beach city	063010	2	645	1667	38.7
Huntington Beach city	099413	2	714	1851	38.6
Anaheim city	087200	1	351	912	38.5
Newport Beach city	063500	7	327	850	38.5
Anaheim city	086802	3	428	1115	38.4
Lake Forest city	032029	1	546	1421	38.4
Buena Park city	110203	2	868	2268	38.3
Garden Grove city	088701	4	293	766	38.3
La Habra city	001101	4	149	389	38.3
Anaheim city	088302	1	449	1174	38.2
Fullerton city	001901	1	514	1346	38.2
Garden Grove city	087503	2	192	503	38.2
Irvine city	052527	3	419	1096	38.2
	110604	3	120	314	38.2
Anaheim city	011722	3	315	827	38.1
Garden Grove city	088002	1	587	1543	38.0
Orange city	075901	2	329	866	38.0
Lake Forest city	052416	1	296	781	37.9
Lake Forest city	052425	1	596	1574	37.9
Huntington Beach city	099410	1	423	1121	37.7
Irvine city	052511	4	399	1058	37.7
Irvine city	052521	1	621	1647	37.7
La Habra city	001402	1	419	1113	37.6
Santa Ana city	074005	4	557	1480	37.6

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Buena Park city	110402	2	155	413	37.5
Cypress city	110117	4	498	1329	37.5
Irvine city	052511	5	311	829	37.5
Yorba Linda city	021802	1	514	1372	37.5
Laguna Beach city	062605	3	457	1223	37.4
	011718	2	137	367	37.3
Huntington Beach city	099220	2	305	819	37.2
Newport Beach city	063004	3	331	890	37.2
Santa Ana city	075902	4	202	543	37.2
Anaheim city	086402	3	518	1398	37.1
La Palma city	110102	3	166	447	37.1
Rancho Santa Margarita city	032051	1	402	1084	37.1
Dana Point city	042310	1	682	1849	36.9
Lake Forest city	052410	1	494	1337	36.9
Orange city	076000	2	644	1743	36.9
Orange city	076102	2	270	731	36.9
Westminster city	099902	2	612	1658	36.9
Cypress city	110106	3	641	1743	36.8
Fullerton city	011000	5	331	899	36.8
Seal Beach city	110008	3	315	855	36.8
Buena Park city	110304	2	671	1828	36.7
La Palma city	110111	3	47	128	36.7
Brea city	001507	2	270	738	36.6
Santa Ana city	075403	4	468	1280	36.6
Brea city	001501	1	578	1584	36.5
Fullerton city	001707	2	253	694	36.5
Huntington Beach city	099235	4	310	849	36.5
Huntington Beach city	099311	2	594	1626	36.5
Anaheim city	086303	1	353	971	36.4
Fullerton city	110605	1	341	936	36.4
Huntington Beach city	099245	2	597	1641	36.4
La Habra city	001705	2	420	1156	36.3
Buena Park city	110401	2	340	942	36.1
Huntington Beach city	099214	2	347	962	36.1
Huntington Beach city	099212	2	386	1073	36.0
La Palma city	110304	2	275	764	36.0
Westminster city	099602	1	381	1057	36.0
	087701	2	501	1397	35.9
Garden Grove city	099203	2	234	653	35.8
Huntington Beach city	099416	1	759	2118	35.8
La Habra city	001401	2	345	964	35.8
Anaheim city	087200	4	307	861	35.7
Brea city	001503	2	310	868	35.7
Brea city	021814	2	700	1968	35.6
Laguna Hills city	062622	4	246	691	35.6
La Habra city	001601	4	71	200	35.5
Orange city	076206	3	315	894	35.2
Garden Grove city	088301	3	359	1025	35.0
Huntington Beach city	099306	4	408	1167	35.0
Irvine city	052523	1	270	772	35.0
Anaheim city	021903	3	384	1100	34.9

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Irvine city	052527	4	209	599	34.9
Dana Point city	042201	6	243	698	34.8
Orange city	076205	2	346	995	34.8
Los Alamitos city	110014	1	235	678	34.7
Aliso Viejo CDP	062636	1	417	1206	34.6
Huntington Beach city	099242	1	533	1542	34.6
Irvine city	052513	4	361	1044	34.6
La Habra city	001101	1	441	1273	34.6
Huntington Beach city	099242	2	765	2215	34.5
Irvine city	062610	1	508	1472	34.5
Orange city	076201	5	434	1258	34.5
Garden Grove city	110004	2	293	852	34.4
Santa Ana city	099203	2	512	1489	34.4
Yorba Linda city	021810	1	240	698	34.4
	063102	1	168	489	34.4
Garden Grove city	088302	2	448	1308	34.3
Irvine city	052418	1	520	1518	34.3
Santa Ana city	075403	1	357	1040	34.3
Brea city	021814	4	584	1707	34.2
Fountain Valley city	099232	2	401	1171	34.2
Dana Point city	042323	3	457	1342	34.1
Orange city	075901	1	260	762	34.1
Anaheim city	021812	3	526	1549	34.0
Anaheim city	086303	3	294	865	34.0
Buena Park city	110304	1	739	2173	34.0
Laguna Beach city	062619	5	190	560	33.9
Newport Beach city	063400	6	295	871	33.9
	001401	1	41	121	33.9
Irvine city	052515	4	529	1567	33.8
Laguna Woods city	062635	2	80	237	33.8
Newport Beach city	063006	5	203	600	33.8
	021817	1	304	899	33.8
Huntington Beach city	099311	1	404	1201	33.6
	075506	2	299	891	33.6
Fullerton city	011000	1	269	804	33.5
	032049	1	53	158	33.5
Placentia city	011710	3	226	676	33.4
Westminster city	099903	1	587	1759	33.4
Anaheim city	087602	1	351	1054	33.3
Fountain Valley city	099250	1	513	1542	33.3
Placentia city	021821	2	1181	3542	33.3
Westminster city	088904	3	413	1242	33.3
Yorba Linda city	011718	1	191	576	33.2
Huntington Beach city	099408	2	429	1295	33.1
Irvine city	052519	1	319	963	33.1
Fullerton city	001505	4	409	1238	33.0
Garden Grove city	110004	1	348	1053	33.0
Irvine city	062612	5	402	1217	33.0
Anaheim city	087103	2	231	702	32.9
Orange city	076208	2	275	835	32.9
Anaheim city	087001	2	394	1203	32.8

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Anaheim city	086407	1	753	2308	32.6
Buena Park city	110401	4	287	880	32.6
Huntington Beach city	099603	1	550	1688	32.6
Westminster city	099241	2	197	605	32.6
Fullerton city	001505	3	368	1131	32.5
Fullerton city	001601	6	316	971	32.5
Laguna Hills city	062621	2	548	1688	32.5
Brea city	001503	1	506	1562	32.4
Dana Point city	042206	2	177	547	32.4
Garden Grove city	088202	2	495	1527	32.4
La Habra city	001102	2	297	918	32.4
Orange city	076000	4	548	1690	32.4
Santa Ana city	074004	3	599	1847	32.4
Orange city	021914	3	264	817	32.3
Orange city	075806	1	404	1249	32.3
Fountain Valley city	099224	2	485	1505	32.2
Placentia city	011721	2	136	423	32.2
Huntington Beach city	099239	2	327	1023	32.0
Huntington Beach city	099413	3	668	2085	32.0
Dana Point city	042313	4	178	558	31.9
Newport Beach city	063006	2	173	542	31.9
Orange city	076201	3	438	1375	31.9
Santa Ana city	075401	1	547	1722	31.8
Anaheim city	021922	2	262	826	31.7
Brea city	001403	2	60	189	31.7
Newport Beach city	062642	2	264	833	31.7
Orange city	076208	3	373	1177	31.7
Seal Beach city	099512	3	184	580	31.7
Irvine city	062628	2	467	1476	31.6
Lake Forest city	052410	2	336	1064	31.6
Newport Beach city	063400	1	281	888	31.6
Newport Beach city	063010	4	206	654	31.5
	099506	3	147	466	31.5
Anaheim city	086902	3	491	1564	31.4
Fullerton city	011000	6	374	1194	31.3
Laguna Beach city	062620	4	328	1048	31.3
Orange city	075815	1	755	2410	31.3
Huntington Beach city	099406	2	851	2726	31.2
Huntington Beach city	099508	1	502	1607	31.2
Laguna Hills city	042320	1	531	1703	31.2
Orange city	075812	4	334	1070	31.2
Seal Beach city	099511	4	272	871	31.2
	063009	1	24	77	31.2
Rancho Santa Margarita city	032051	2	282	907	31.1
Brea city	001507	3	605	1951	31.0
Buena Park city	110303	2	745	2404	31.0
Lake Forest city	052423	3	431	1391	31.0
Newport Beach city	062800	2	468	1512	31.0
Westminster city	088904	4	458	1476	31.0
Laguna Beach city	062632	4	371	1204	30.8
Rancho Santa Margarita city	032054	1	662	2147	30.8

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Cypress city	110114	3	544	1771	30.7
Yorba Linda city	021830	4	240	783	30.7
Laguna Beach city	062619	3	338	1104	30.6
Westminster city	099905	2	390	1276	30.6
Cypress city	110110	3	529	1733	30.5
Garden Grove city	088203	3	206	675	30.5
Anaheim city	087501	1	581	1912	30.4
La Habra city	001403	2	328	1079	30.4
Laguna Beach city	062604	1	224	738	30.4
Dana Point city	042201	3	162	534	30.3
Huntington Beach city	099220	3	384	1268	30.3
Buena Park city	110201	1	521	1725	30.2
Huntington Beach city	099306	5	263	870	30.2
Huntington Beach city	099404	1	724	2397	30.2
Anaheim city	021919	1	441	1465	30.1
Cypress city	110114	1	506	1682	30.1
Dana Point city	042205	2	106	352	30.1
Garden Grove city	110004	3	341	1134	30.1
Huntington Beach city	099309	2	463	1539	30.1
	087902	2	191	634	30.1
Cypress city	110113	1	563	1877	30.0
Fountain Valley city	099227	1	258	859	30.0
Los Alamitos city	110012	4	6	20	30.0
Anaheim city	086304	1	480	1606	29.9
Huntington Beach city	099237	1	500	1670	29.9
Huntington Beach city	099402	1	173	578	29.9
Yorba Linda city	021826	2	464	1552	29.9
	087703	4	215	720	29.9
Garden Grove city	110003	2	535	1796	29.8
Newport Beach city	063006	6	114	383	29.8
Newport Beach city	063500	2	249	835	29.8
Anaheim city	021916	2	565	1900	29.7
Garden Grove city	088105	2	379	1276	29.7
Irvine city	052517	1	689	2317	29.7
Newport Beach city	063500	4	274	923	29.7
Fullerton city	001505	2	105	355	29.6
Westminster city	099701	1	351	1184	29.6
Fountain Valley city	099202	1	185	627	29.5
Fullerton city	001706	2	315	1067	29.5
Fullerton city	011503	2	266	903	29.5
Garden Grove city	088904	2	156	528	29.5
Huntington Beach city	099405	1	358	1214	29.5
Irvine city	052521	3	207	702	29.5
Laguna Hills city	042307	3	310	1055	29.4
Seal Beach city	099506	1	126	428	29.4
Lake Forest city	052424	3	478	1630	29.3
Newport Beach city	063004	2	476	1627	29.3
Anaheim city	021915	1	553	1896	29.2
Santa Ana city	074110	2	328	1124	29.2
Stanton city	087805	2	50	171	29.2
Placentia city	011717	2	237	814	29.1

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Yorba Linda city	021802	4	413	1420	29.1
Buena Park city	110203	1	202	696	29.0
Westminster city	099906	2	385	1329	29.0
Fountain Valley city	099230	2	695	2401	28.9
Laguna Woods city	062623	6	204	707	28.9
Rossmoor CDP	110006	1	402	1395	28.8
Irvine city	052513	2	254	886	28.7
Yorba Linda city	021815	1	526	1832	28.7
Buena Park city	110202	1	398	1394	28.6
Huntington Beach city	099602	2	447	1563	28.6
Lake Forest city	052425	4	527	1841	28.6
Huntington Beach city	099246	3	198	694	28.5
Tustin Foothills CDP	075603	2	383	1343	28.5
Westminster city	099241	1	578	2025	28.5
Buena Park city	110202	2	167	591	28.3
Buena Park city	110604	1	527	1862	28.3
Cypress city	110106	1	210	742	28.3
La Habra city	001101	3	289	1023	28.3
Orange city	076206	2	192	681	28.2
Brea city	021814	1	642	2286	28.1
Fullerton city	001503	4	257	913	28.1
Santa Ana city	075301	2	333	1185	28.1
Fountain Valley city	099231	2	513	1831	28.0
Fullerton city	001705	3	252	900	28.0
Fullerton city	110605	5	682	2440	28.0
Huntington Beach city	099310	2	488	1744	28.0
Laguna Hills city	062621	1	472	1687	28.0
Orange city	021913	3	541	1932	28.0
La Palma city	110116	1	418	1499	27.9
Garden Grove city	110005	2	471	1693	27.8
Huntington Beach city	099407	1	692	2485	27.8
Laguna Hills city	042327	2	254	914	27.8
Santa Ana city	075401	2	505	1816	27.8
Anaheim city	086306	3	278	1003	27.7
Buena Park city	110301	4	287	1036	27.7
Lake Forest city	052410	3	140	505	27.7
Seal Beach city	099512	2	231	835	27.7
Buena Park city	110604	4	242	881	27.5
Yorba Linda city	021802	2	271	987	27.5
Dana Point city	042324	1	200	729	27.4
Anaheim city	086306	2	288	1054	27.3
Fountain Valley city	099225	1	445	1629	27.3
Irvine city	052525	2	280	1026	27.3
Irvine city	052525	6	264	968	27.3
Newport Beach city	062800	1	154	564	27.3
Fullerton city	001601	5	444	1635	27.2
Irvine city	052505	3	199	731	27.2
La Habra city	001708	1	301	1111	27.1
Yorba Linda city	021822	3	272	1004	27.1
Fullerton city	001901	2	365	1351	27.0
Garden Grove city	110010	1	277	1026	27.0

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Orange city	021918	1	340	1259	27.0
Rancho Santa Margarita city	032050	1	173	643	26.9
Rancho Santa Margarita city	032050	2	482	1790	26.9
Santa Ana city	075100	3	445	1657	26.9
Aliso Viejo CDP	042320	3	401	1503	26.7
Anaheim city	021903	1	394	1474	26.7
Huntington Beach city	099216	1	222	833	26.7
Laguna Hills city	042307	2	237	889	26.7
	001101	4	133	498	26.7
Dana Point city	042311	4	379	1427	26.6
Dana Point city	042338	1	142	533	26.6
Fountain Valley city	099232	1	433	1627	26.6
Huntington Beach city	099214	1	207	777	26.6
Huntington Beach city	099416	2	390	1464	26.6
Irvine city	052519	2	319	1200	26.6
Irvine city	062629	2	218	821	26.6
Huntington Beach city	099605	1	520	1960	26.5
Placentia city	011716	1	1117	4213	26.5
Westminster city	099703	2	637	2401	26.5
Yorba Linda city	021802	3	340	1283	26.5
Yorba Linda city	021817	1	498	1880	26.5
	087805	3	117	441	26.5
Newport Beach city	063500	3	237	897	26.4
Newport Beach city	063603	3	361	1365	26.4
Buena Park city	086803	2	223	847	26.3
Newport Beach city	063007	2	514	1955	26.3
Huntington Beach city	099216	2	402	1537	26.2
Rancho Santa Margarita city	032054	4	328	1258	26.1
Westminster city	099702	3	293	1121	26.1
Irvine city	052526	3	481	1853	26.0
Irvine city	052528	1	174	669	26.0
La Habra city	001301	3	311	1198	26.0
Seal Beach city	099512	4	200	768	26.0
Aliso Viejo CDP	062640	1	403	1557	25.9
La Habra city	001707	1	546	2107	25.9
Newport Beach city	062702	5	334	1292	25.9
Tustin Foothills CDP	075604	3	178	690	25.8
Westminster city	099601	4	224	873	25.7
Yorba Linda city	021827	2	252	982	25.7
Huntington Beach city	099237	2	473	1848	25.6
Irvine city	052505	1	200	784	25.5
Irvine city	052515	3	528	2076	25.4
Orange city	075805	2	339	1337	25.4
Orange city	076101	2	386	1520	25.4
Westminster city	099906	3	372	1462	25.4
Newport Beach city	063006	4	119	471	25.3
Placentia city	011709	4	351	1390	25.3
Seal Beach city	099511	3	150	594	25.3
Newport Beach city	062800	4	141	559	25.2
Dana Point city	042338	2	1074	4273	25.1
Garden Grove city	110001	1	435	1731	25.1

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Huntington Beach city	099604	2	456	1817	25.1
Anaheim city	087103	5	363	1452	25.0
Laguna Beach city	062604	4	138	551	25.0
Orange city	021913	2	312	1250	25.0
Brea city	001501	3	694	2788	24.9
Cypress city	110114	2	350	1405	24.9
Dana Point city	042339	1	180	723	24.9
Huntington Beach city	099240	3	423	1702	24.9
Seal Beach city	110007	2	205	822	24.9
Westminster city	099603	3	292	1171	24.9
Irvine city	052506	1	254	1026	24.8
Irvine city	052513	1	205	827	24.8
Irvine city	052525	5	141	569	24.8
Orange city	021914	1	251	1016	24.7
Santa Ana city	074110	1	663	2687	24.7
Aliso Viejo CDP	062639	2	495	2013	24.6
Cypress city	110109	3	294	1194	24.6
Irvine city	052511	3	221	899	24.6
Placentia city	021810	2	273	1110	24.6
Rossmoor CDP	110008	1	237	965	24.6
Orange city	075806	2	247	1008	24.5
Anaheim city	087805	2	108	442	24.4
Huntington Beach city	099306	1	362	1484	24.4
Huntington Beach city	099417	2	401	1643	24.4
Dana Point city	042311	3	204	841	24.3
Garden Grove city	088202	1	315	1297	24.3
Huntington Beach city	099214	3	225	929	24.2
Huntington Beach city	099405	2	291	1204	24.2
Orange city	075812	3	293	1210	24.2
	001402	1	8	33	24.2
	063102	4	113	467	24.2
Dana Point city	042323	1	352	1459	24.1
Irvine city	052521	4	232	961	24.1
Orange city	075807	2	459	1902	24.1
Placentia city	011709	2	171	711	24.1
	001101	2	91	377	24.1
Fountain Valley city	099234	1	314	1308	24.0
Huntington Beach city	099238	1	465	1938	24.0
Aliso Viejo CDP	062634	1	208	872	23.9
Anaheim city	086305	1	240	1005	23.9
Huntington Beach city	099604	1	454	1897	23.9
Irvine city	052517	2	598	2500	23.9
Yorba Linda city	021809	3	171	714	23.9
Fountain Valley city	099204	3	114	479	23.8
Laguna Beach city	042305	1	226	950	23.8
Lake Forest city	052408	4	266	1117	23.8
Fountain Valley city	099229	2	517	2181	23.7
Fountain Valley city	099250	2	266	1121	23.7
Newport Beach city	063400	3	241	1016	23.7
Tustin Foothills CDP	075701	1	204	861	23.7
Fullerton city	001708	3	339	1438	23.6

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Fullerton city	011200	4	162	685	23.6
Huntington Beach city	099410	2	184	779	23.6
Laguna Hills city	062625	3	311	1319	23.6
Laguna Woods city	062623	2	26	110	23.6
Placentia city	011710	2	468	1986	23.6
Huntington Beach city	099406	1	400	1699	23.5
Irvine city	052520	3	229	973	23.5
Huntington Beach city	099215	2	407	1743	23.4
Irvine city	052505	5	522	2227	23.4
Laguna Beach city	062619	4	92	394	23.4
Huntington Beach city	099411	1	181	776	23.3
Irvine city	062611	4	123	529	23.3
Tustin Foothills CDP	075702	3	224	960	23.3
Tustin Foothills CDP	075703	2	408	1750	23.3
Newport Beach city	063400	5	79	341	23.2
Orange city	075807	1	264	1137	23.2
Westminster city	099223	3	265	1140	23.2
Fountain Valley city	099224	1	439	1903	23.1
Garden Grove city	110010	3	162	701	23.1
Huntington Beach city	099603	4	299	1296	23.1
Newport Beach city	062800	3	195	844	23.1
Brea city	001501	2	250	1086	23.0
Fountain Valley city	099231	1	426	1855	23.0
Fountain Valley city	099232	3	366	1598	22.9
Brea city	001404	1	83	364	22.8
Huntington Beach city	099311	3	216	946	22.8
Fullerton city	011503	1	174	768	22.7
Newport Beach city	062800	5	284	1251	22.7
Placentia city	011708	3	180	792	22.7
Huntington Beach city	099508	2	189	835	22.6
Rancho Santa Margarita city	032051	6	122	540	22.6
Anaheim city	021919	2	293	1303	22.5
Fullerton city	001704	2	176	782	22.5
Newport Beach city	062644	3	530	2352	22.5
Fountain Valley city	099223	3	124	554	22.4
Laguna Woods city	062621	3	110	491	22.4
Cypress city	110104	2	471	2110	22.3
Fullerton city	011300	2	239	1074	22.3
Orange city	076202	1	256	1148	22.3
Placentia city	021821	1	378	1697	22.3
Dana Point city	042323	4	172	777	22.1
Garden Grove city	110004	4	356	1613	22.1
Tustin Foothills CDP	075702	2	280	1269	22.1
Yorba Linda city	021816	1	244	1103	22.1
Huntington Beach city	099605	2	386	1758	22.0
Lake Forest city	052408	2	553	2509	22.0
Newport Beach city	062642	3	308	1398	22.0
Fountain Valley city	099234	2	375	1716	21.9
Lake Forest city	052425	2	173	790	21.9
Santa Ana city	074107	3	255	1165	21.9
Aliso Viejo CDP	062637	2	286	1309	21.8

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Orange city	075605	1	139	638	21.8
Seal Beach city	099511	5	209	960	21.8
Anaheim city	086305	3	201	928	21.7
Huntington Beach city	099217	2	146	673	21.7
Huntington Beach city	099235	2	177	814	21.7
Huntington Beach city	099243	2	314	1447	21.7
Huntington Beach city	099310	1	373	1725	21.6
Huntington Beach city	099310	3	221	1023	21.6
Irvine city	052515	1	378	1750	21.6
Garden Grove city	088201	3	217	1008	21.5
Garden Grove city	110003	1	297	1379	21.5
Irvine city	052514	3	265	1233	21.5
Westminster city	099702	2	151	702	21.5
Buena Park city	086801	1	141	660	21.4
Laguna Beach city	062619	1	254	1187	21.4
Cypress city	110010	1	303	1425	21.3
Orange city	075811	1	368	1736	21.2
	021914	3	182	860	21.2
Aliso Viejo CDP	062636	2	272	1292	21.1
Aliso Viejo CDP	062637	1	313	1486	21.1
Aliso Viejo CDP	062640	2	394	1871	21.1
Dana Point city	042206	1	76	361	21.1
Irvine city	062612	1	390	1848	21.1
Irvine city	062612	6	347	1647	21.1
Newport Beach city	062642	1	161	762	21.1
Newport Beach city	062644	4	303	1444	21.0
Orange city	021918	2	480	2282	21.0
Orange city	075813	1	337	1604	21.0
Cypress city	110111	2	405	1938	20.9
Irvine city	052513	3	240	1147	20.9
Lake Forest city	052410	4	284	1357	20.9
Fountain Valley city	099226	1	396	1906	20.8
Irvine city	062611	3	167	804	20.8
La Palma city	110102	1	338	1622	20.8
Seal Beach city	099512	1	133	638	20.8
Yorba Linda city	021825	1	400	1922	20.8
Fountain Valley city	099226	2	418	2019	20.7
Seal Beach city	099511	1	143	690	20.7
Yorba Linda city	021816	3	124	598	20.7
Brea city	001403	1	313	1520	20.6
Fountain Valley city	099227	3	331	1606	20.6
La Habra city	001301	2	267	1299	20.6
Lake Forest city	052422	1	243	1182	20.6
Garden Grove city	110005	1	300	1461	20.5
Huntington Beach city	099412	2	236	1153	20.5
La Palma city	110102	2	456	2226	20.5
Huntington Beach city	099235	1	247	1212	20.4
Yorba Linda city	021820	2	288	1409	20.4
Fountain Valley city	099251	3	256	1262	20.3
Huntington Beach city	099513	2	161	794	20.3
Newport Beach city	062644	2	240	1180	20.3

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Rossmoor CDP	110007	1	250	1233	20.3
Fullerton city	011200	1	191	947	20.2
Huntington Beach city	099217	3	208	1031	20.2
Seal Beach city	110012	4	312	1541	20.2
Fullerton city	001602	4	246	1226	20.1
Portola Hills CDP	052428	2	192	957	20.1
Yorba Linda city	021822	2	352	1755	20.1
	021913	2	89	442	20.1
Fullerton city	011707	2	258	1289	20.0
Newport Beach city	062900	1	212	1059	20.0
Anaheim city	021905	1	335	1684	19.9
Anaheim city	021905	2	406	2040	19.9
Irvine city	062612	4	144	724	19.9
Lake Forest city	052422	3	233	1173	19.9
Westminster city	099906	1	398	1997	19.9
Brea city	011717	1	70	353	19.8
Tustin Foothills CDP	075603	1	239	1209	19.8
Yorba Linda city	021816	2	311	1573	19.8
Huntington Beach city	099216	3	189	957	19.7
Irvine city	052511	1	283	1435	19.7
Irvine city	062628	1	255	1292	19.7
Seal Beach city	099504	1	482	2447	19.7
Laguna Beach city	062620	5	110	562	19.6
Lake Forest city	032027	2	626	3192	19.6
Yorba Linda city	021823	1	560	2859	19.6
Cypress city	110010	2	229	1176	19.5
Irvine city	062629	1	361	1854	19.5
La Habra city	001403	1	91	467	19.5
Huntington Beach city	099602	1	104	535	19.4
Irvine city	052514	2	250	1290	19.4
Lake Forest city	052423	1	291	1498	19.4
Villa Park city	075810	2	213	1100	19.4
Yorba Linda city	021809	1	226	1165	19.4
Fullerton city	001704	1	274	1419	19.3
Garden Grove city	088001	1	257	1335	19.3
Newport Beach city	063500	6	223	1155	19.3
Yorba Linda city	021826	1	186	965	19.3
Aliso Viejo CDP	062634	4	173	902	19.2
Huntington Beach city	099309	1	389	2021	19.2
La Palma city	110116	2	360	1877	19.2
Newport Beach city	063400	4	153	798	19.2
	032052	1	83	433	19.2
Huntington Beach city	099417	1	443	2315	19.1
Laguna Beach city	062605	4	124	648	19.1
Newport Beach city	063004	1	337	1768	19.1
Yorba Linda city	021810	2	80	418	19.1
	011715	1	76	398	19.1
Irvine city	062614	1	421	2219	19.0
Laguna Hills city	042307	6	268	1409	19.0
Newport Beach city	062900	2	143	752	19.0
Placentia city	021820	2	320	1687	19.0

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
	075701	4	11	58	19.0
Fountain Valley city	099233	1	314	1658	18.9
Orange city	076201	1	146	774	18.9
	021914	1	54	285	18.9
Dana Point city	042339	4	178	945	18.8
Laguna Hills city	042328	2	191	1017	18.8
	032011	1	204	1086	18.8
Anaheim city	021905	3	277	1484	18.7
Huntington Beach city	099243	1	489	2617	18.7
Lake Forest city	052428	5	182	975	18.7
Orange city	076201	4	161	864	18.6
Placentia city	011712	3	144	775	18.6
Laguna Beach city	062604	2	123	666	18.5
Orange city	075808	1	162	874	18.5
Orange city	075812	2	212	1143	18.5
Orange city	075813	3	334	1808	18.5
Rossmoor CDP	110008	2	204	1103	18.5
Anaheim city	021807	2	340	1843	18.4
Villa Park city	075810	3	144	781	18.4
Aliso Viejo CDP	062638	1	452	2470	18.3
Huntington Beach city	099239	3	171	935	18.3
La Palma city	110115	2	211	1152	18.3
	032041	1	72	393	18.3
Huntington Beach city	099245	1	260	1426	18.2
Newport Beach city	062701	1	353	1943	18.2
Placentia city	011709	1	197	1080	18.2
Rancho Santa Margarita city	032048	3	239	1313	18.2
Irvine city	052526	2	344	1904	18.1
Irvine city	062612	2	189	1042	18.1
Laguna Hills city	062621	3	184	1018	18.1
Newport Beach city	062702	1	120	664	18.1
Orange city	075808	2	208	1149	18.1
Fullerton city	001707	3	265	1470	18.0
Lake Forest city	052416	2	349	1937	18.0
Yorba Linda city	021820	1	197	1097	18.0
	021917	2	111	621	17.9
Cypress city	110117	2	182	1025	17.8
Laguna Hills city	042307	1	281	1577	17.8
Newport Beach city	063009	1	280	1577	17.8
Santa Ana city	074111	1	208	1169	17.8
Huntington Beach city	099217	1	134	756	17.7
Laguna Beach city	062623	6	205	1159	17.7
Orange city	076202	2	129	730	17.7
Yorba Linda city	021822	1	167	941	17.7
	099506	2	64	361	17.7
Newport Beach city	063603	2	254	1447	17.6
Cypress city	110118	2	242	1385	17.5
Santa Ana city	075303	1	180	1031	17.5
Placentia city	011710	1	133	763	17.4
Irvine city	052525	3	149	859	17.3
Los Alamitos city	110015	2	323	1862	17.3

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Newport Beach city	063005	2	118	683	17.3
	011718	1	47	272	17.3
Fullerton city	001706	3	131	762	17.2
Laguna Beach city	042305	3	263	1527	17.2
Anaheim city	021923	3	190	1110	17.1
Fullerton city	001505	1	311	1823	17.1
Huntington Beach city	099415	1	184	1076	17.1
Huntington Beach city	099702	2	66	385	17.1
Dana Point city	042323	2	194	1139	17.0
Fullerton city	011402	1	163	957	17.0
Huntington Beach city	099240	1	309	1818	17.0
Irvine city	052511	6	154	904	17.0
Lake Forest city	052422	2	292	1713	17.0
	042335	1	168	990	17.0
Dana Point city	042305	2	84	496	16.9
Fullerton city	001601	4	74	437	16.9
Lake Forest city	052415	2	346	2043	16.9
	021812	2	64	378	16.9
	075808	1	74	438	16.9
Newport Beach city	063007	3	330	1969	16.8
Tustin Foothills CDP	075701	3	77	458	16.8
Anaheim city	021920	1	137	818	16.7
Irvine city	052515	2	250	1496	16.7
Irvine city	062630	1	283	1699	16.7
Garden Grove city	076103	1	38	229	16.6
La Habra city	001708	2	230	1385	16.6
Anaheim city	021915	2	85	514	16.5
Cypress city	110118	1	255	1550	16.5
Lake Forest city	052424	2	239	1448	16.5
Irvine city	052417	4	172	1049	16.4
Laguna Beach city	062632	1	313	1921	16.3
Lake Forest city	032029	2	527	3226	16.3
Newport Beach city	063006	3	100	614	16.3
Rancho Santa Margarita city	032055	4	207	1268	16.3
Westminster city	099603	2	126	774	16.3
	032011	2	35	215	16.3
Fullerton city	001707	4	280	1727	16.2
Rancho Santa Margarita city	032055	3	177	1095	16.2
Yorba Linda city	021809	2	113	697	16.2
Anaheim city	021922	4	231	1432	16.1
Fullerton city	001601	2	190	1180	16.1
Irvine city	052522	1	233	1451	16.1
Placentia city	011709	3	195	1208	16.1
Buena Park city	110301	1	207	1297	16.0
Fullerton city	011402	2	208	1301	16.0
Irvine city	052520	2	136	848	16.0
Laguna Beach city	042305	2	128	799	16.0
Orange city	075814	1	400	2497	16.0
Placentia city	011715	3	262	1639	16.0
Tustin Foothills CDP	075604	5	240	1504	16.0
Fullerton city	011401	2	212	1332	15.9

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Huntington Beach city	099404	2	369	2323	15.9
Tustin Foothills CDP	075604	1	189	1190	15.9
	021918	1	27	170	15.9
Alero Viejo CDP	062635	2	245	1553	15.8
Anaheim city	021812	2	318	2012	15.8
Orange city	075815	3	164	1037	15.8
Yorba Linda city	021827	1	52	330	15.8
Cypress city	110001	1	166	1056	15.7
Fountain Valley city	099225	2	272	1728	15.7
Orange city	021917	1	146	931	15.7
Rancho Santa Margarita city	032056	2	136	864	15.7
Fountain Valley city	099202	3	49	315	15.6
Anaheim city	021923	1	217	1400	15.5
Huntington Beach city	099412	3	255	1648	15.5
Orange city	075809	3	9	58	15.5
Tustin Foothills CDP	075606	4	195	1258	15.5
Newport Beach city	063500	5	50	324	15.4
Seal Beach city	110012	1	200	1300	15.4
Tustin Foothills CDP	075703	1	343	2224	15.4
Alero Viejo CDP	062639	1	178	1165	15.3
Fullerton city	001601	3	159	1038	15.3
Huntington Beach city	099514	3	194	1272	15.3
Newport Beach city	062702	3	169	1102	15.3
Irvine city	052421	4	62	408	15.2
Lake Forest city	052427	2	371	2446	15.2
Irvine city	052520	4	194	1287	15.1
Anaheim city	075813	1	59	394	15.0
Dana Point city	042201	4	102	680	15.0
Irvine city	062631	2	116	771	15.0
Rossmoor CDP	110006	2	226	1503	15.0
Tustin Foothills CDP	075606	5	33	220	15.0
Villa Park city	075809	1	152	1010	15.0
Brea city	001506	2	320	2147	14.9
Laguna Beach city	062604	3	63	424	14.9
Yorba Linda city	021829	1	315	2108	14.9
Fountain Valley city	099230	1	293	1985	14.8
Huntington Beach city	099240	4	117	789	14.8
Irvine city	052527	2	439	2964	14.8
Rossmoor CDP	110008	3	204	1381	14.8
Anaheim city	021903	2	203	1384	14.7
Anaheim city	021924	1	640	4357	14.7
Dana Point city	042311	2	132	899	14.7
	063103	1	109	742	14.7
Irvine city	052522	4	115	787	14.6
Laguna Beach city	062620	3	127	869	14.6
Lake Forest city	052416	3	194	1333	14.6
Irvine city	052421	3	183	1258	14.5
Placentia city	011718	1	111	766	14.5
Placentia city	011718	2	196	1352	14.5
Rancho Santa Margarita city	032034	3	191	1316	14.5
Fountain Valley city	099232	4	146	1014	14.4

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Huntington Beach city	099240	2	121	843	14.4
La Palma city	110115	3	207	1450	14.3
Laguna Hills city	042327	3	344	2414	14.3
Laguna Beach city	062620	1	171	1202	14.2
Fullerton city	001602	1	194	1377	14.1
Aliso Viejo CDP	062635	3	158	1131	14.0
Fullerton city	001706	4	109	781	14.0
Irvine city	052514	4	220	1575	14.0
Newport Beach city	063007	1	165	1180	14.0
Aliso Viejo CDP	062636	3	166	1198	13.9
Aliso Viejo CDP	062639	3	323	2323	13.9
Yorba Linda city	021824	1	156	1119	13.9
Newport Beach city	063103	1	51	370	13.8
Aliso Viejo CDP	062641	3	127	925	13.7
Buena Park city	110301	2	179	1303	13.7
Irvine city	052417	1	269	1966	13.7
Laguna Beach city	062620	2	189	1384	13.7
Aliso Viejo CDP	062634	5	177	1300	13.6
Aliso Viejo CDP	062639	4	101	740	13.6
Lake Forest city	052426	2	293	2162	13.6
Anaheim city	021921	2	408	3012	13.5
Huntington Beach city	099514	4	80	594	13.5
Irvine city	052527	1	407	3022	13.5
Laguna Beach city	062632	3	84	620	13.5
Huntington Beach city	099239	1	276	2055	13.4
Irvine city	052528	3	145	1085	13.4
Orange city	075605	4	180	1341	13.4
Brea city	021815	1	60	450	13.3
Buena Park city	086801	3	20	150	13.3
Huntington Beach city	099220	4	194	1458	13.3
Huntington Beach city	099238	2	288	2161	13.3
Fountain Valley city	099231	3	262	1981	13.2
Rancho Santa Margarita city	032043	2	200	1512	13.2
Cypress city	110011	2	169	1292	13.1
Irvine city	052511	2	99	753	13.1
Newport Beach city	063005	1	102	779	13.1
Rossmoor CDP	110007	4	228	1735	13.1
Villa Park city	075809	3	127	973	13.1
Anaheim city	021920	2	166	1279	13.0
Laguna Beach city	062619	2	93	717	13.0
Newport Beach city	063400	2	135	1040	13.0
Placentia city	011715	2	344	2640	13.0
Rancho Santa Margarita city	032053	1	320	2459	13.0
Huntington Beach city	099415	3	84	649	12.9
Orange city	075810	1	29	224	12.9
Villa Park city	075809	2	140	1089	12.9
Dana Point city	042339	2	48	374	12.8
Fountain Valley city	099229	1	221	1725	12.8
Newport Beach city	063010	3	173	1355	12.8
Newport Beach city	063601	3	78	609	12.8
Rancho Santa Margarita city	032053	2	216	1686	12.8

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Anaheim city	021923	2	282	2221	12.7
Las Flores CDP	032053	4	252	1986	12.7
Tustin Foothills CDP	075702	1	115	909	12.7
Fullerton city	001706	1	113	894	12.6
Newport Beach city	062702	4	87	692	12.6
Newport Beach city	063006	1	63	505	12.5
Newport Beach city	063008	9	110	877	12.5
Coto de Caza CDP	032044	3	222	1789	12.4
Newport Beach city	063500	8	97	788	12.3
Orange city	075605	3	244	1978	12.3
Rancho Santa Margarita city	032049	3	195	1588	12.3
Newport Beach city	062643	1	85	694	12.2
Rancho Santa Margarita city	032049	1	294	2411	12.2
Orange city	021912	3	135	1115	12.1
Irvine city	052522	2	144	1202	12.0
Newport Beach city	062701	2	115	959	12.0
Orange city	021917	2	158	1314	12.0
Anaheim city	021920	4	230	1926	11.9
Huntington Beach city	099415	4	301	2531	11.9
Huntington Beach city	099513	1	140	1189	11.8
Anaheim city	021920	3	152	1307	11.6
Laguna Hills city	042327	1	210	1805	11.6
Laguna Hills city	042328	1	152	1312	11.6
Aliso Viejo CDP	062635	1	139	1209	11.5
Cypress city	110011	1	167	1456	11.5
Orange city	021912	2	152	1318	11.5
Orange city	021913	1	96	840	11.4
Anaheim city	021922	1	159	1401	11.3
Coto de Caza CDP	032045	2	189	1674	11.3
Lake Forest city	052428	3	101	893	11.3
Lake Forest city	052428	4	253	2248	11.3
Villa Park city	075810	1	101	892	11.3
Aliso Viejo CDP	062634	2	250	2226	11.2
Coto de Caza CDP	032045	1	131	1170	11.2
Yorba Linda city	021830	1	153	1372	11.2
Newport Beach city	063007	4	91	822	11.1
Rancho Santa Margarita city	032049	4	299	2699	11.1
Lake Forest city	052408	1	133	1208	11.0
Irvine city	052523	2	201	1841	10.9
Irvine city	052525	1	130	1191	10.9
Newport Beach city	062643	2	149	1361	10.9
Newport Beach city	062645	1	190	1746	10.9
Irvine city	052528	2	93	865	10.8
Newport Beach city	062702	2	99	928	10.7
Lake Forest city	052426	1	113	1071	10.6
Newport Beach city	062645	2	95	900	10.6
Newport Beach city	063004	4	139	1313	10.6
Rancho Santa Margarita city	032051	5	66	622	10.6
Anaheim city	021923	4	83	791	10.5
Placentia city	021810	1	46	439	10.5
Yorba Linda city	021825	2	154	1469	10.5

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Anaheim city	021915	3	164	1573	10.4
Fullerton city	110605	4	106	1018	10.4
Huntington Beach city	099308	1	519	5044	10.3
Irvine city	052513	6	92	893	10.3
Orange city	075604	5	145	1404	10.3
Coto de Caza CDP	032044	2	184	1811	10.2
Laguna Beach city	062632	2	27	265	10.2
Yorba Linda city	021817	2	91	894	10.2
Yorba Linda city	021829	2	183	1795	10.2
Rancho Santa Margarita city	032042	1	379	3768	10.1
Santa Ana city	075806	3	42	417	10.1
Seal Beach city	110012	3	94	927	10.1
Huntington Beach city	099703	1	37	370	10.0
Irvine city	052506	2	149	1496	10.0
Irvine city	052523	3	148	1477	10.0
Irvine city	062631	3	81	810	10.0
Fullerton city	001602	2	99	998	9.9
Lake Forest city	052427	1	263	2658	9.9
Huntington Beach city	099514	1	145	1487	9.8
Newport Beach city	062645	4	67	682	9.8
Yorba Linda city	011717	1	22	226	9.7
Coto de Caza CDP	032046	4	110	1148	9.6
Tustin Foothills CDP	075605	2	189	1966	9.6
Anaheim city	021916	1	158	1667	9.5
Huntington Beach city	099246	2	178	1872	9.5
Irvine city	052417	3	183	1943	9.4
Orange city	075604	4	114	1213	9.4
Los Alamitos city	110108	1	112	1207	9.3
Lake Forest city	052411	3	108	1168	9.2
Yorba Linda city	021824	2	162	1765	9.2
Seal Beach city	110012	2	99	1085	9.1
Cypress city	110109	1	64	711	9.0
Irvine city	052525	4	142	1574	9.0
Newport Beach city	062645	3	97	1080	9.0
	021917	1	44	496	8.9
Orange city	075814	2	73	829	8.8
Orange city	075816	2	120	1369	8.8
Yorba Linda city	021830	2	137	1564	8.8
	021816	3	45	513	8.8
Rancho Santa Margarita city	032050	3	167	1924	8.7
Yorba Linda city	021810	3	84	991	8.5
Huntington Beach city	099246	1	102	1217	8.4
Newport Beach city	063010	1	162	1924	8.4
Newport Beach city	063010	5	76	907	8.4
Yorba Linda city	021830	3	180	2157	8.3
Huntington Beach city	099413	1	147	1802	8.2
Lake Forest city	052415	1	169	2064	8.2
Anaheim city	021921	1	118	1493	7.9
	032041	1	46	580	7.9
	032049	2	51	646	7.9
Newport Coast CDP	062643	3	101	1297	7.8

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Yorba Linda city	021829	3	116	1489	7.8
Fullerton city	001602	3	52	671	7.7
Coto de Caza CDP	032044	1	76	1009	7.5
Coto de Caza CDP	032046	2	117	1594	7.3
Huntington Beach city	099244	1	153	2099	7.3
Aliso Viejo CDP	062633	1	194	2704	7.2
Huntington Beach city	099514	5	69	961	7.2
Irvine city	052420	3	193	2746	7.0
Laguna Hills city	062647	3	59	839	7.0
Las Flores CDP	032056	4	112	1594	7.0
Orange city	021912	1	58	832	7.0
Aliso Viejo CDP	062638	2	132	1919	6.9
Portola Hills CDP	052428	1	90	1318	6.8
Yorba Linda city	021828	3	126	1845	6.8
Laguna Hills city	042333	1	129	1913	6.7
Rancho Santa Margarita city	032048	4	122	1823	6.7
Tustin Foothills CDP	075606	2	48	715	6.7
Irvine city	052420	2	140	2141	6.5
Yorba Linda city	021827	3	112	1724	6.5
	032011	2	28	434	6.5
Aliso Viejo CDP	062633	2	58	914	6.3
Irvine city	052421	2	84	1331	6.3
Rossmoor CDP	110007	3	58	923	6.3
Yorba Linda city	021828	2	81	1359	6.0
Tustin Foothills CDP	075604	2	89	1546	5.8
Tustin Foothills CDP	075606	1	60	1047	5.7
Irvine city	062631	1	63	1138	5.5
Irvine city	052522	3	33	615	5.4
Newport Beach city	062644	1	86	1599	5.4
Huntington Beach city	099514	2	80	1507	5.3
Placentia city	021815	1	9	174	5.2
	021816	2	20	382	5.2
	075807	2	6	115	5.2
Irvine city	052526	1	31	622	5.0
Stanton city	110113	1	19	388	4.9
Irvine city	052420	1	123	2551	4.8
Dana Point city	042324	2	46	996	4.6
Coto de Caza CDP	032044	4	63	1447	4.4
Irvine city	052421	1	78	1823	4.3
Laguna Hills city	042333	2	109	2514	4.3
Rancho Santa Margarita city	032042	3	59	1365	4.3
Anaheim city	021922	3	38	922	4.1
Rancho Santa Margarita city	032050	4	31	786	3.9
Tustin Foothills CDP	075606	3	40	1038	3.9
Lake Forest city	052408	3	59	1551	3.8
Yorba Linda city	021812	1	32	834	3.8
Huntington Beach city	099415	2	43	1231	3.5
Rancho Santa Margarita city	032043	1	96	2775	3.5
	062604	3	35	1042	3.4
Yorba Linda city	021828	1	47	1501	3.1
Rancho Santa Margarita city	032056	1	22	803	2.7

Low/Mod Population by Census Tract and Block Group

Place Name	Census Tract	Block Group	# Low/Mod	Total Population	Low/Mod%
Irvine city	062631	4	20	822	2.4
Las Flores CDP	032056	3	35	2072	1.7
Brea city	021814	3	9	1036	0.9
Lake Forest city	052426	3	8	1397	0.6
Anaheim city	021813	9	0	10	0.0
Anaheim city	021923	2	0	342	0.0
Anaheim city	075813	3	0	106	0.0
Coto de Caza CDP	032046	3	0	189	0.0
Coto de Caza CDP	032046	1	0	756	0.0
Coto de Caza CDP	032046	3	0	470	0.0
Cypress city	110010	3	0	75	0.0
Garden Grove city	088904	1	0	125	0.0
Garden Grove city	110010	2	0	157	0.0
Irvine city	052518	1	0	2	0.0
Newport Beach city	062610	1	0	7	0.0
Newport Beach city	062645	1	0	416	0.0
Orange city	021915	2	0	85	0.0
Orange city	075810	3	0	60	0.0
Villa Park city	075811	1	0	79	0.0
Villa Park city	075813	1	0	28	0.0
Villa Park city	075814	2	0	58	0.0
Yorba Linda city	021823	2	0	338	0.0
Yorba Linda city	021827	1	0	520	0.0
	001707	2	0	184	0.0
	021912	3	0	95	0.0
	052404	1	0	20	0.0
	052426	1	0	36	0.0
	063102	3	0	64	0.0
	075604	4	0	34	0.0
	087801	3	0	22	0.0



Technical Appendix D

2008 Home Mortgage Disclosure Act Data for Orange County

Table D-1
Orange County
Disposition of Loan Applications
By Race/Ethnicity – 2008

FHA, FSA/RHS and VA Home Purchase Loans					
	Loans Originated	Applications Approved, but Not Accepted	Applications Denied	Total Applications	Percent Denied
American Indian/Alaska Native	29	4	9	42	21.4%
Asian	238	28	80	346	23.1%
Black or African American	64	13	20	97	20.6%
Nat. Hawaiian/Other Pacific Isl.	41	4	8	53	15.1%
White	2,408	313	671	3,392	19.8%
Two or More Races	4	0	1	5	20.0%
Joint (White/Minority Race)	104	14	28	146	19.2%
Race Not Available	275	54	130	459	28.3%
Total	3,163	430	947	4,540	20.9%
Hispanic or Latino	795	104	340	1,239	27.4%
Joint (Hispanic/Latino & Non Hispanic/Latino)	167	16	29	212	13.7%
Conventional Home Purchase Loans					
	Loans Originated	Applications Approved, but Not Accepted	Applications Denied	Total Applications	Percent Denied
American Indian/Alaska Native	74	20	46	140	32.9%
Asian	4,824	979	1,261	7,064	17.9%
Black or African American	117	30	56	203	27.6%
Nat. Hawaiian/Other Pacific Isl.	108	21	34	163	20.9%
White	10,917	2,360	3,685	16,962	21.7%
Two or More Races	20	1	5	26	19.2%
Joint (White/Minority Race)	458	72	109	639	17.1%
Race Not Available	2,515	644	1,011	4,170	24.2%
Total	19,033	4,127	6,207	29,367	21.1%
Hispanic or Latino	1,788	690	1,181	3,659	32.3%
Joint (Hispanic/Latino & Non Hispanic/Latino)	411	72	111	594	18.7%

Table D-1 continued
Orange County
Disposition of Loan Applications
By Race/Ethnicity – 2008

Refinance Loan Applications					
	Loans Originated	Applications Approved, but Not Accepted	Applications Denied	Total Applications	Percent Denied
American Indian/Alaska Native	123	48	408	579	70.5%
Asian	2,686	763	1,604	5,053	31.7%
Black or African American	160	58	242	460	52.6%
Nat. Hawaiian/Other Pacific Isl.	175	44	223	442	50.5%
White	18,419	4,302	10,791	33,512	32.2%
Two or More Races	29	1	24	54	44.4%
Joint (White/Minority Race)	490	87	311	888	35.0%
Race Not Available	5,037	1,374	3,407	9,818	34.7%
Total	27,119	6,677	17,010	50,806	33.5%
Hispanic or Latino	2,902	1,178	3,651	7,731	47.2%
Joint (Hispanic/Latino & Non Hispanic/Latino)	647	113	398	1,158	34.4%
Home Improvement Loans					
	Loans Originated	Applications Approved, but Not Accepted	Applications Denied	Total Applications	Percent Denied
American Indian/Alaska Native	39	7	100	146	68.5%
Asian	189	47	242	478	50.6%
Black or African American	24	4	45	73	61.6%
Nat. Hawaiian/Other Pacific Isl.	10	4	25	39	64.1%
White	1,848	336	1,409	3,593	39.2%
Two or More Races	0	0	3	3	100.0%
Joint (White/Minority Race)	45	5	45	95	47.4%
Race Not Available	722	222	633	1,577	40.1%
Total	2,877	625	2,502	6,004	41.7%
Hispanic or Latino	342	96	556	994	55.9%
Joint (Hispanic/Latino & Non Hispanic/Latino)	88	9	64	161	39.8%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 4-1 Disposition of Applications for FHA, FSA/RHS and VA Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Race, Ethnicity, Gender and Income of Applicant, 2008. Aggregate Table 4-2 Disposition of Applications for Conventional Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Race, Ethnicity, Gender and Income of Applicant, 2008. Aggregate Table 4-3 Disposition of Applications to Refinance Loans on 1 to 4 Family and Manufactured Home Dwellings, by Race, Ethnicity, Gender and Income of Applicant, 2008. Aggregate Table 4-4 Disposition of Applications for Home Improvement Loans 1 to 4 Family and Manufactured Home Dwellings, by Race, Ethnicity, Gender and Income of Applicant, 2008.

Table construction by Castañeda & Associates

Table D-2
Orange County
Disposition of FHA Loan Applications
By Race/Ethnicity-2004 and 2008

Race/Ethnicity	Loans Originated		App. Approved But Not Accepted		Applications Denied		Total Applications		Percent Denied	
	2004	2008	2004	2008	2004	2008	2004	2008	2004	2008
White, Non Hispanic	67	1,613	0	209	4	331	71	2,153	5.6%	15.4%
Hispanic	79	795	8	104	18	340	105	1,239	17.1%	27.4%
Asian	14	238	3	28	3	80	20	346	15.0%	23.1%
American Indian/Alaska Native	10	29	0	4	0	9	10	42	0.0%	21.4%
Black or African American	6	64	0	13	1	20	7	97	14.3%	20.6%
Nat. Hawaiian/Other Pac. Isl.	3	41	1	4	0	8	4	53	0.0%	15.1%
2 or More Minority Races	0	4	0	0	2	1	2	5	100.0%	20.0%
Joint White/Minority	7	104	0	14	1	28	8	146	12.5%	19.2%
Race Not Available	48	275	12	54	14	130	74	459	18.9%	28.3%
Subtotal	234	3,163	24	430	43	947	301	4,540	14.3%	20.9%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 4-1 Disposition of Applications for FHA, FSA/RHS and VA Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Race, Ethnicity, Gender and Income of Applicant, 2004 and 2008

Table construction by Castañeda & Associates

Table D-3
Orange County
Disposition of Conventional Loan Applications
By Race/Ethnicity-2004 and 2008

Race/Ethnicity	Loans Originated		App. Approved But Not Accepted		Applications Denied		Total Applications		Percent Denied	
	2004	2008	2004	2008	2004	2008	2004	2008	2004	2008
White, Non Hispanic	23,785	9,129	3,806	1,670	3,871	2,504	31,462	13,303	12.3%	18.8%
Hispanic	12,275	1,788	2,382	690	3,868	1,181	18,525	3,659	20.9%	32.3%
Asian	8,501	4,824	2,004	979	1,911	1,261	12,416	7,064	15.4%	17.9%
American Indian/Alaska Native	899	74	118	20	219	46	1,236	140	17.7%	32.9%
Black or African American	603	117	94	30	216	56	913	203	23.7%	27.6%
Nat. Hawaiian/Other Pac. Isl.	611	108	129	21	204	34	944	163	21.6%	20.9%
2 or More Minority Races	57	20	16	1	15	5	88	26	17.0%	19.2%
Joint White/Minority	1,005	458	202	72	167	109	1,374	639	12.2%	17.1%
Race Not Available	12,041	2,515	3,523	644	4,081	1,011	19,645	4,170	20.8%	24.2%
Subtotal	59,777	19,033	12,274	4,127	14,552	6,207	86,603	29,367	16.8%	21.1%

Source: Aggregate Table 4-2 Disposition of Applications for Conventional Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Race, Ethnicity, Gender and Income of Applicant, 2004 and 2008

Table construction by Castañeda & Associates

Table D-4
Orange County
FHA/VA Denial Rates by Income and Race/Ethnicity – 2008

Income Category	Loans Originated	App. Approved But Not Accepted	Applications Denied	Total Applications	Percent Denied
Very Low					
White, Non Hispanic	19	1	5	25	20.0%
Hispanic	40	1	20	61	32.8%
Asian	2	0	1	3	33.3%
American Indian/Alaska Native	0	0	0	0	0.0%
Black or African American	1	0	0	1	0.0%
Nat. Hawaiian/Other Pac. Isl.	1	0	0	1	0.0%
2 or More Minority Races	0	0	0	0	0.0%
Joint White/Minority	0	0	0	0	0.0%
Race Not Available	3	4	11	18	61.1%
Subtotal	66	6	37	109	33.9%
Low					
White, Non Hispanic	182	17	40	239	16.7%
Hispanic	179	23	96	298	32.2%
Asian	28	4	16	48	33.3%
American Indian/Alaska Native	10	0	4	14	28.6%
Black or African American	17	1	4	22	18.2%
Nat. Hawaiian/Other Pac. Isl.	2	0	1	3	33.3%
2 or More Minority Races	0	0	0	0	0.0%
Joint White/Minority	8	1	5	14	35.7%
Race Not Available	32	8	28	68	41.2%
Subtotal	458	54	194	706	27.5%
Moderate					
White, Non Hispanic	429	65	78	572	13.6%
Hispanic	327	45	138	510	27.1%
Asian	87	11	21	119	17.6%
American Indian/Alaska Native	9	1	3	13	23.1%
Black or African American	15	5	7	27	25.9%
Nat. Hawaiian/Other Pac. Isl.	14	1	3	18	16.7%
2 or More Minority Races	2	0	1	3	33.3%
Joint White/Minority	31	3	4	38	10.5%
Race Not Available	99	12	37	148	25.0%
Subtotal	1,013	143	292	1,448	20.2%

Table D-4 continued
Orange County
FHA/VA Denial Rates by Income and Race/Ethnicity – 2008

Income Category	Loans Originated	App. Approved But Not Accepted	Applications Denied	Total Applications	Percent Denied
Above Moderate					
White, Non Hispanic	940	115	183	1,238	14.8%
Hispanic	234	34	73	341	21.4%
Asian	118	13	38	169	22.5%
American Indian/Alaska Native	10	3	2	15	13.3%
Black or African American	28	7	9	44	20.5%
Nat. Hawaiian/Other Pac. Isl.	23	3	3	29	10.3%
2 or More Minority Races	2	0	0	2	0.0%
Joint White/Minority	56	10	18	84	21.4%
Race Not Available	137	29	48	214	22.4%
Subtotal	1,548	214	374	2,136	17.5%
All Income Levels					
White, Non Hispanic	1,570	198	306	2,074	14.8%
Hispanic	780	103	327	1,210	27.0%
Asian	235	28	76	339	22.4%
American Indian/Alaska Native	29	4	9	42	21.4%
Black or African American	61	13	20	94	21.3%
Nat. Hawaiian/Other Pac. Isl.	40	4	7	51	13.7%
2 or More Minority Races	4	0	1	5	20.0%
Joint White/Minority	95	14	27	136	19.9%
Race Not Available	271	53	124	448	27.7%
Subtotal	3,085	417	897	4,399	20.4%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 5-1 Disposition of Applications for FHA, FSA/RHS and VA Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Income, Race and Ethnicity of Applicant, 2008

Table construction by Castañeda & Associates

Table D-5
Orange County
Conventional Denial Rates by Income and Race/Ethnicity – 2008

Income Category	Loans Originated	App. Approved But Not Accepted	Applications Denied	Total Applications	Percent Denied
Very Low					
White, Non Hispanic	192	47	79	318	24.8%
Hispanic	76	32	88	196	44.9%
Asian	100	20	59	179	33.0%
American Indian/Alaska Native	1	1	3	5	60.0%
Black or African American	5	3	4	12	33.3%
Nat. Hawaiian/Other Pac. Isl.	6	1	4	11	36.4%
2 or More Minority Races	0	0	1	1	100.0%
Joint White/Minority	3	1	1	5	20.0%
Race Not Available	44	9	70	123	56.9%
Subtotal	427	114	309	850	36.4%
Low					
White, Non Hispanic	907	162	243	1,312	18.5%
Hispanic	455	179	272	906	30.0%
Asian	805	133	164	1,102	14.9%
American Indian/Alaska Native	18	4	11	33	33.3%
Black or African American	12	7	17	36	47.2%
Nat. Hawaiian/Other Pac. Isl.	11	2	4	17	23.5%
2 or More Minority Races	4	0	2	6	33.3%
Joint White/Minority	18	3	7	28	25.0%
Race Not Available	239	93	128	460	27.8%
Subtotal	2,469	583	848	3,900	21.7%
Moderate					
White, Non Hispanic	1,942	326	446	2,714	16.4%
Hispanic	600	244	413	1,257	32.9%
Asian	1,372	265	313	1,950	16.1%
American Indian/Alaska Native	13	3	14	30	46.7%
Black or African American	44	6	12	62	19.4%
Nat. Hawaiian/Other Pac. Isl.	33	9	8	50	16.0%
2 or More Minority Races	3	0	0	3	0.0%
Joint White/Minority	70	12	21	103	20.4%
Race Not Available	466	135	197	798	24.7%
Subtotal	4,543	1,000	1,424	6,967	20.4%

Table D-5 continued
Orange County
Conventional Denial Rates by Income and Race/Ethnicity – 2008

Income Category	Loans Originated	App. Approved But Not Accepted	Applications Denied	Total Applications	Percent Denied
Above Moderate					
White, Non Hispanic	6,032	1,131	1,689	8,852	19.1%
Hispanic	647	224	400	1,271	31.5%
Asian	2,463	549	694	3,706	18.7%
American Indian/Alaska Native	42	12	16	70	22.9%
Black or African American	56	14	22	92	23.9%
Nat. Hawaiian/Other Pac. Isl.	57	9	17	83	20.5%
2 or More Minority Races	13	1	2	16	12.5%
Joint White/Minority	358	53	78	489	16.0%
Race Not Available	1,720	397	590	2,707	21.8%
Subtotal	11,388	2,390	3,508	17,286	20.3%
All Income Levels					
White, Non Hispanic	9,073	1,666	2,457	13,196	18.6%
Hispanic	1,778	679	1,173	3,630	32.3%
Asian	4,740	967	1,230	6,937	17.7%
American Indian/Alaska Native	74	20	44	138	31.9%
Black or African American	117	30	55	202	27.2%
Nat. Hawaiian/Other Pac. Isl.	107	21	33	161	20.5%
2 or More Minority Races	20	1	5	26	19.2%
Joint White/Minority	449	69	107	625	17.1%
Race Not Available	2,469	634	985	4,088	24.1%
Subtotal	18,827	4,087	6,089	29,003	21.0%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 5-2 Disposition of Applications for Conventional Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Income, Race and Ethnicity of Applicant, 2008

Table construction by Castañeda & Associates

Notes:

1. APPLICANTS ARE SHOWN IN ONLY ONE RACE CATEGORY. FOR PURPOSES OF CATEGORIZATION, THE GENERAL RULE IS: THE RACE (INCLUDING SITUATIONS WHERE RACE WAS REPORTED AS NOT PROVIDED OR NOT APPLICABLE) OF THE APPLICATION IS CATEGORIZED BY THE RACE OF THE FIRST PERSON LISTED ON THE APPLICATION UNLESS THE "JOINT" RACE DEFINITION APPLIES. ("JOINT" MEANS ONE APPLICANT REPORTS A SINGLE RACIAL DESIGNATION OF "WHITE" AND THE OTHER APPLICANT REPORTS ONE OR MORE MINORITY RACIAL DESIGNATIONS.) IF THE "JOINT" DEFINITION DOES NOT APPLY, THE RACE OF THE FIRST PERSON ON THE APPLICATION IS CATEGORIZED AS FOLLOWS:
 - THE REPORTED RACE WHEN A SINGLE RACIAL DESIGNATION IS REPORTED; OR
 - "2 OR MORE MINORITY RACES" WHEN TWO OR MORE MINORITY RACIAL DESIGNATIONS ARE REPORTED; OR
 - THE MINORITY RACE WHEN TWO RACIAL DESIGNATIONS ARE REPORTED AND ONE IS WHITE.
2. "NOT AVAILABLE" INCLUDES SITUATIONS WHERE INFORMATION WAS REPORTED AS NOT PROVIDED OR NOT APPLICABLE. FOR THE INCOME CLASSIFICATION, ZEROS AND INVALID CODES ARE INCLUDED.
3. APPLICANTS ARE SHOWN IN ONLY ONE ETHNICITY CATEGORY. FOR PURPOSES OF CATEGORIZATION, THE GENERAL RULE IS: THE ETHNICITY (INCLUDING SITUATIONS WHERE ETHNICITY WAS REPORTED AS NOT PROVIDED OR NOT APPLICABLE) OF THE APPLICATION IS CATEGORIZED BY THE ETHNICITY OF THE FIRST PERSON LISTED ON THE APPLICATION UNLESS THE "JOINT" ETHNICITY DEFINITION APPLIES. ("JOINT" MEANS ONE APPLICANT REPORTS ETHNICITY AS HISPANIC OR LATINO AND THE OTHER APPLICANT REPORTS ETHNICITY AS NOT HISPANIC OR LATINO.)
4. "MINORITY STATUS" COMBINES INFORMATION REPORTED ON RACE AND ETHNICITY. "WHITE NON-HISPANIC" CONSISTS OF APPLICANTS OF WHITE RACE WHO ARE NOT OF HISPANIC OR LATINO ORIGIN. THE "OTHERS, INCLUDING HISPANIC" CATEGORY CONSISTS OF APPLICANTS OF MINORITY RACES OR HISPANIC OR LATINO ORIGIN. APPLICANTS NOT SHOWN ARE NON-HISPANICS WHERE RACE IS NOT AVAILABLE, WHITES WHERE ETHNICITY IS NOT AVAILABLE AND THOSE WHERE BOTH RACE AND ETHNICITY ARE NOT AVAILABLE.

Table D-6
Orange County
Disposition of FHA Loans by Characteristics of
Census Tract in Which Property is Located – 2008

Income Category	Loans Originated	Application Approved But Not Accepted	Applications Denied	Total Applications	Percent Denied
Very Low					
Less Than 10% Minority					
10-19% Minority					
20-49% Minority					
50-79% Minority					
80-100% Minority	67	5	46	118	39.0%
Low					
Less Than 10% Minority					
10-19% Minority					
20-49% Minority	114	22	22	158	13.9%
50-79% Minority	657	72	218	947	23.0%
80-100% Minority	265	45	125	435	28.7%
Moderate					
Less Than 10% Minority	11	1	4	16	25.0%
10-19% Minority	18	5	9	32	28.1%
20-49% Minority	739	96	182	1,017	17.9%
50-79% Minority	384	49	94	527	17.8%
80-100% Minority	25	2	11	38	28.9%
Above Moderate					
Less Than 10% Minority					
10-19% Minority	222	37	56	315	17.8%
20-49% Minority	639	93	176	908	19.4%
50-79% Minority	22	2	4	28	14.3%
80-100% Minority					
All Other Tracts		1		1	0.0%
Total	3,163	430	947	4,540	20.9%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 7-1 Disposition of Applications for FHA, FSA/RHS and VA Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Characteristics of Census Tract in Which Property is Located, 2008

Table construction by Castañeda & Associates

Notes:

"MINORITY" MEANS (1) ALL RACES OTHER THAN WHITE AND (2) WHITES OF HISPANIC OR LATINO ORIGIN

THE VERY LOW-INCOME CATEGORY CONSISTS OF CENSUS TRACTS WHERE THE MEDIAN FAMILY INCOME IS LESS THAN 50 PERCENT OF THE MEDIAN MSA/MD INCOME, BASED ON THE 2000 CENSUS OF POPULATION AND HOUSING. THE LOW-INCOME CATEGORY CONSISTS OF CENSUS TRACTS WHERE THE MEDIAN FAMILY INCOME IS AT LEAST 50 PERCENT AND LESS THAN 80 PERCENT OF THE MEDIAN MSA/MD INCOME. THE MODERATE-INCOME CATEGORY CONSISTS OF CENSUS TRACTS WHERE THE MEDIAN FAMILY INCOME IS AT LEAST 80 PERCENT AND LESS THAN 120 PERCENT OF THE MEDIAN MSA/MD INCOME. THE ABOVE MODERATE-INCOME CATEGORY CONSISTS OF CENSUS TRACTS WHERE THE MEDIAN FAMILY INCOME IS 120 PERCENT OR MORE OF THE MEDIAN MSA/MD INCOME

EXCLUDES CENSUS TRACTS WITH NO REPORTED INCOME

Table D-7
Orange County
Disposition of Conventional Loans by Characteristics of
Census Tract in Which Property is Located – 2008

Income Category	Loans Originated	Application Approved But Not Accepted	Applications Denied	Total Applications	Percent Denied
Very Low					
Less Than 10% Minority					
10-19% Minority					
20-49% Minority					
50-79% Minority					
80-100% Minority	223	85	175	483	36.2%
Low					
Less Than 10% Minority	74	2	2	78	2.6%
10-19% Minority	45	6	15	66	22.7%
20-49% Minority	526	114	148	788	18.8%
50-79% Minority	2,583	608	932	4,123	22.6%
80-100% Minority	974	302	578	1,854	31.2%
Moderate					
Less Than 10% Minority	149	27	28	204	13.7%
10-19% Minority	361	73	151	585	25.8%
20-49% Minority	3,764	705	1,166	5,635	20.7%
50-79% Minority	1,736	387	563	2,686	21.0%
80-100% Minority	103	25	42	170	24.7%
Above Moderate					
Less Than 10% Minority	234	60	103	397	25.9%
10-19% Minority	2,689	601	872	4,162	21.0%
20-49% Minority	5,287	1,066	1,349	7,702	17.5%
50-79% Minority	283	65	83	431	19.3%
80-100% Minority					
All Other Tracts	2	1	0	3	0.0%
Total	19,033	4,127	6,207	29,367	21.1%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 7-2 Disposition of Applications for Conventional Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Characteristics of Census Tract in Which Property is Located, 2008

Table construction by Castañeda & Associates

Notes:

"MINORITY" MEANS (1) ALL RACES OTHER THAN WHITE AND (2) WHITES OF HISPANIC OR LATINO ORIGIN

THE VERY LOW-INCOME CATEGORY CONSISTS OF CENSUS TRACTS WHERE THE MEDIAN FAMILY INCOME IS LESS THAN 50 PERCENT OF THE MEDIAN MSA/MD INCOME, BASED ON THE 2000 CENSUS OF POPULATION AND HOUSING. THE LOW-INCOME CATEGORY CONSISTS OF CENSUS TRACTS WHERE THE MEDIAN FAMILY INCOME IS AT LEAST 50 PERCENT AND LESS THAN 80 PERCENT OF THE MEDIAN MSA/MD INCOME. THE MODERATE-INCOME CATEGORY CONSISTS OF CENSUS TRACTS WHERE THE MEDIAN FAMILY INCOME IS AT LEAST 80 PERCENT AND LESS THAN 120 PERCENT OF THE MEDIAN MSA/MD INCOME. THE ABOVE MODERATE-INCOME CATEGORY CONSISTS OF CENSUS TRACTS WHERE THE MEDIAN FAMILY INCOME IS 120 PERCENT OR MORE OF THE MEDIAN MSA/MD INCOME

EXCLUDES CENSUS TRACTS WITH NO REPORTED INCOME

Table D-8
Orange County
Reasons for Loan Denial by Race/Ethnicity – 2008

FHA, FSA/RHS Home Purchase Loans										
Race/Ethnicity	Debt-to-Income Ratio	Employ. History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit App. Incomplete	Mortgage Insurance Denied	Other	Total
American Indian/Alaska Native	40.0%	0.0%	20.0%	20.0%	0.0%	0.0%	10.0%	0.0%	10.0%	10
Asian	44.2%	2.3%	15.1%	10.5%	2.3%	7.0%	4.7%	0.0%	14.0%	86
Black or African American	27.3%	0.0%	22.7%	18.2%	4.5%	4.5%	4.5%	0.0%	18.2%	22
Nat. Hawaiian/Other Pacific Isl.	57.1%	0.0%	14.3%	0.0%	0.0%	0.0%	14.3%	0.0%	14.3%	7
White	37.9%	2.3%	13.3%	10.3%	3.4%	5.0%	6.4%	0.3%	21.1%	700
2 or More Races	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0
Joint (White/Minority Race)	32.1%	7.1%	7.1%	3.6%	7.1%	10.7%	10.7%	0.0%	21.4%	28
Race Not Available	39.2%	2.8%	14.0%	6.3%	4.9%	7.0%	11.2%	0.0%	14.7%	143
Hispanic or Latino	40.2%	1.4%	16.0%	8.7%	3.4%	5.6%	4.8%	0.3%	19.7%	356
Joint (Hispanic/Latino & Non-Hispanic/Latino)	32.1%	3.6%	17.9%	7.1%	0.0%	7.1%	0.0%	0.0%	32.1%	28
Conventional										
Race/Ethnicity	Debt-to-Income Ratio	Employ. History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit App. Incomplete	Mortgage Insurance Denied	Other	Total
American Indian/Alaska Native	26.4%	0.0%	5.7%	7.5%	17.0%	9.4%	7.5%	0.0%	26.4%	53
Asian	20.9%	2.0%	6.6%	15.4%	5.3%	11.3%	15.1%	0.6%	22.9%	1,420
Black or African American	23.3%	0.0%	15.0%	6.7%	3.3%	6.7%	20.0%	1.7%	23.3%	60
Nat. Hawaiian/Other Pacific Isl.	39.4%	3.0%	3.0%	9.1%	3.0%	3.0%	6.1%	0.0%	33.3%	33
White	23.1%	1.5%	8.5%	14.4%	5.2%	10.2%	12.6%	1.2%	23.3%	4,086
2 or More Races	40.0%	0.0%	20.0%	0.0%	0.0%	0.0%	20.0%	0.0%	20.0%	5
Joint (White/Minority Race)	22.9%	1.7%	3.4%	19.5%	3.4%	10.2%	12.7%	0.8%	25.4%	118
Race Not Available	24.3%	2.2%	8.8%	12.1%	5.7%	11.8%	11.3%	0.6%	23.2%	1,034
Hispanic or Latino	21.1%	1.0%	10.3%	13.5%	6.6%	11.1%	7.2%	1.6%	27.6%	1,252
Joint (Hispanic/Latino & Non-Hispanic/Latino)	25.0%	0.8%	9.2%	13.3%	7.5%	5.8%	16.7%	0.8%	20.8%	120

Table D-8 continued
Orange County
Reasons for Loan Denial by Race/Ethnicity – 2008

Refinance										
Race/Ethnicity	Debt-to-Income Ratio	Employ. History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit App. Incomplete	Mortgage Insurance Denied	Other	Total
American Indian/Alaska Native	31.5%	0.6%	14.3%	26.8%	1.8%	3.0%	6.0%	1.2%	14.9%	168
Asian	21.4%	1.3%	5.8%	31.2%	2.4%	6.9%	12.8%	0.2%	17.9%	1,458
Black or African American	31.6%	2.2%	14.7%	21.3%	2.9%	5.9%	3.7%	0.0%	17.6%	136
Nat. Hawaiian/Other Pacific Isl.	25.9%	2.1%	8.4%	37.1%	1.4%	7.7%	7.7%	0.7%	9.1%	143
White	24.5%	0.9%	10.5%	26.2%	2.6%	7.5%	10.7%	0.2%	16.9%	9,235
2 or More Races	22.2%	0.0%	0.0%	55.6%	0.0%	0.0%	0.0%	0.0%	22.2%	9
Joint (White/Minority Race)	17.4%	0.0%	15.2%	31.3%	3.1%	4.9%	11.6%	0.0%	16.5%	224
Race Not Available	26.6%	1.0%	11.8%	25.8%	2.3%	7.3%	8.8%	0.2%	16.2%	3,131
Hispanic or Latino	28.1%	0.9%	12.2%	27.6%	2.7%	7.1%	6.8%	0.3%	14.2%	3,064
Joint (Hispanic/Latino & Non-Hispanic/Latino	26.0%	1.7%	12.5%	28.7%	2.4%	3.7%	8.8%	0.3%	15.9%	296

Table D-8 continued
Orange County
Reasons for Loan Denial by Race/Ethnicity – 2008

Home Improvement										
Race/Ethnicity	Debt-to-Income Ratio	Employ. History	Credit History	Collateral	Insufficient Cash	Unverifiable Information	Credit App. Incomplete	Mortgage Insurance Denied	Other	Total
American Indian/Alaska Native	27.0%	0.0%	40.5%	10.8%	0.0%	2.7%	10.8%	0.0%	8.1%	37
Asian	25.7%	1.1%	20.2%	21.3%	1.1%	9.8%	2.7%	0.0%	18.0%	183
Black or African American	28.6%	0.0%	52.4%	4.8%	4.8%	0.0%	4.8%	0.0%	4.8%	21
Nat. Hawaiian/Other Pacific Isl.	27.8%	0.0%	22.2%	22.2%	0.0%	5.6%	5.6%	0.0%	16.7%	18
White	28.9%	0.9%	23.4%	20.3%	1.2%	5.0%	6.4%	0.0%	13.9%	926
2 or More Races	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1
Joint (White/Minority Race)	22.7%	0.0%	13.6%	40.9%	0.0%	0.0%	9.1%	0.0%	13.6%	22
Race Not Available	14.9%	0.2%	55.6%	9.9%	1.0%	3.6%	3.2%	0.0%	11.6%	585
Hispanic or Latino	33.1%	0.6%	28.0%	18.3%	0.9%	3.4%	5.4%	0.0%	10.3%	350
Joint (Hispanic/Latino & Non-Hispanic/Latino	17.2%	0.0%	34.5%	34.5%	3.4%	0.0%	6.9%	0.0%	3.4%	29

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 8-1 Reasons for Denial of Applications for FHA, FSA/RHS and VA Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Race, Ethnicity, Gender and Income of Applicant, 2008. Aggregate Table 8-2 Reasons for Denial of Applications for Conventional Home-Purchase Loans, 1 to 4 Family and Manufactured Home Dwellings, by Race, Ethnicity, Gender and Income of Applicant, 2008. Aggregate Table 8-3 Reasons for Denial of Applications to Refinance Loans on 1 to 4 Family and Manufactured Home Dwellings, by Race, Ethnicity, Gender and Income of Applicant, 2008. Aggregate Table 8-4 Reasons for Denial of Applications for Home Improvement Loans 1 to 4 Family and Manufactured Home Dwellings, by Race, Ethnicity, Gender and Income of Applicant, 2008.

Table construction by Castañeda & Associates



Technical Appendix E

Loan Denial Rates for Census Tracts with a High Number of Loan Applications

Table E-1
Entitlement Cities
FHA Loan Application Denial Rates by Census Tract
With 15+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
755.15	Irvine	79%	51.4%
755.15	Santa Ana	79%	51.4%
877.01	Anaheim	54%	43.8%
752.02	Santa Ana	95%	41.2%
868.02	Anaheim	67%	40.7%
762.01	Orange	34%	36.4%
742.00	Santa Ana	95%	36.4%
320.51	Rancho Santa Margarita	32%	35.3%
870.02	Anaheim	59%	34.6%
864.04	Anaheim	82%	33.3%
891.02	Garden Grove	82%	33.3%
750.02	Santa Ana	96%	33.3%
891.02	Santa Ana	82%	33.3%
320.14	Lake Forest	47%	33.3%
741.06	Santa Ana	62%	30.4%
878.02	Anaheim	65%	29.4%
1105.00	Buena Park	79%	27.8%
320.53	Rancho Santa Margarita	23%	27.3%
992.27	Fountain Valley	61%	26.7%
881.01	Garden Grove	45%	26.7%
749.01	Santa Ana	98%	26.7%
741.03	Santa Ana	93%	25.0%
863.01	Anaheim	74%	25.0%
219.13	Orange	70%	25.0%
1103.02	Buena Park	63%	23.8%
320.29	Lake Forest	30%	23.5%
320.27	Lake Forest	44%	23.3%
868.01	Anaheim	50%	22.7%
868.01	Buena Park	50%	22.7%
864.07	Anaheim	58%	22.2%
747.02	Santa Ana	96%	22.2%
525.25	Irvine	42%	22.2%
320.50	Rancho Santa Margarita	27%	21.9%
741.02	Santa Ana	93%	21.1%
884.03	Anaheim	74%	20.6%
884.03	Garden Grove	74%	20.6%
876.02	Anaheim	62%	20.0%
876.02	Garden Grove	62%	20.0%
524.11	Lake Forest	49%	18.8%
524.22	Lake Forest	26%	18.8%

Table E-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by Census Tract
With 15+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
754.05	Santa Ana	37%	18.8%
320.56	Rancho Santa Margarita	28%	18.5%
746.01	Santa Ana	93%	18.2%
219.23	Anaheim	37%	17.6%
754.01	Santa Ana	49%	17.6%
867.01	Anaheim	65%	16.7%
867.01	Fullerton	65%	16.7%
524.16	Lake Forest	34%	16.7%
762.02	Orange	39%	16.7%
878.06	Anaheim	78%	16.7%
878.06	Garden Grove	78%	16.7%
866.01	Anaheim	87%	15.8%
754.03	Santa Ana	62%	15.7%
1102.03	Anaheim	41%	15.0%
1102.03	Buena Park	41%	15.0%
320.54	Rancho Santa Margarita	28%	14.3%
888.01	Garden Grove	81%	13.3%
740.06	Santa Ana	75%	12.9%
863.03	Anaheim	53%	12.8%
874.01	Anaheim	72%	12.1%
1103.01	Buena Park	56%	11.8%
218.12	Anaheim	33%	11.1%
760.00	Orange	51%	10.7%
760.00	Santa Ana	51%	10.7%
740.04	Santa Ana	73%	10.5%
13.03	La Habra	68%	10.0%
1102.01	Anaheim	53%	10.0%
1102.01	Buena Park	53%	10.0%
877.04	Anaheim	58%	8.0%
871.03	Anaheim	58%	5.9%
1103.04	Buena Park	55%	5.6%
1104.01	Buena Park	51%	5.6%
762.08	Orange	30%	4.0%
867.02	Anaheim	75%	0.0%
320.55	Rancho Santa Margarita	37%	0.0%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 1 Disposition of Applications, by Location of Property and Type of Loan, 2008

Table construction by Castañeda & Associates

Table E-2
Entitlement Cities
Conventional Loan Application Denial Rates by Census Tract
With 50+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
746.02	Santa Ana	97%	44.2%
752.02	Santa Ana	95%	44.2%
742.00	Santa Ana	95%	41.6%
749.01	Santa Ana	98%	41.3%
740.03	Santa Ana	95%	40.4%
998.01	Westminster	67%	38.9%
873.00	Anaheim	85%	37.7%
320.55	Rancho Santa Margarita	37%	37.5%
747.01	Santa Ana	98%	36.8%
627.02	Newport Beach	8%	36.4%
750.02	Santa Ana	96%	36.2%
747.02	Santa Ana	96%	36.0%
864.07	Anaheim	58%	35.6%
320.54	Rancho Santa Margarita	28%	35.1%
635.00	Newport Beach	11%	34.6%
320.51	Rancho Santa Margarita	32%	34.1%
890.01	Garden Grove	90%	33.8%
890.01	Santa Ana	90%	33.8%
754.03	Santa Ana	62%	33.3%
1105.00	Buena Park	79%	33.3%
996.01	Westminster	73%	32.8%
889.02	Garden Grove	81%	32.7%
891.02	Garden Grove	82%	32.5%
891.02	Santa Ana	82%	32.5%
872.00	Anaheim	65%	32.1%
994.16	Huntington Beach	24%	31.4%
761.03	Garden Grove	78%	30.5%
761.03	Orange	78%	30.5%
320.53	Rancho Santa Margarita	23%	30.1%
626.43	Newport Beach	22%	29.9%
320.50	Rancho Santa Margarita	27%	29.7%
762.06	Orange	32%	29.4%
876.02	Anaheim	62%	29.3%
876.02	Garden Grove	62%	29.3%
320.14	Lake Forest	47%	28.9%
864.04	Anaheim	82%	28.8%
219.18	Orange	38%	28.3%
993.10	Huntington Beach	20%	28.0%
762.08	Orange	30%	27.8%
878.05	Anaheim	68%	27.8%

Table E-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by Census Tract
With 50+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
740.06	Santa Ana	75%	27.5%
992.24	Fountain Valley	42%	27.3%
992.27	Fountain Valley	61%	26.9%
626.45	Newport Beach	17%	26.8%
741.07	Santa Ana	43%	26.8%
997.03	Huntington Beach	48%	26.0%
997.03	Westminster	48%	26.0%
996.03	Huntington Beach	30%	25.9%
996.03	Westminster	30%	25.9%
524.10	Irvine	34%	25.9%
524.10	Lake Forest	34%	25.9%
636.03	Newport Beach	14%	25.7%
1104.01	Buena Park	51%	25.4%
758.13	Orange	36%	25.0%
1102.01	Anaheim	53%	25.0%
1102.01	Buena Park	53%	25.0%
741.02	Santa Ana	93%	24.7%
626.44	Newport Beach	13%	24.7%
880.01	Garden Grove	61%	24.6%
888.01	Garden Grove	81%	24.6%
884.01	Garden Grove	58%	24.2%
219.21	Anaheim	35%	24.1%
993.11	Huntington Beach	18%	23.9%
867.02	Anaheim	75%	23.9%
740.04	Santa Ana	73%	23.6%
877.04	Anaheim	58%	23.5%
1102.03	Anaheim	41%	23.5%
1102.03	Buena Park	41%	23.5%
759.01	Orange	50%	23.3%
890.04	Santa Ana	89%	23.3%
15.01	La Habra	27%	23.2%
525.15	Irvine	60%	23.2%
877.01	Anaheim	54%	23.1%
748.03	Santa Ana	92%	23.0%
320.29	Lake Forest	30%	22.7%
885.02	Garden Grove	75%	22.6%
762.01	Orange	34%	22.2%
756.04	Orange	22%	22.2%
762.02	Orange	39%	22.2%
117.07	Fullerton	29%	22.1%

Table E-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by Census Tract
With 50+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
994.08	Huntington Beach	22%	22.0%
524.16	Lake Forest	34%	22.0%
758.15	Orange	34%	22.0%
15.05	Fullerton	31%	22.0%
755.15	Irvine	79%	21.8%
755.15	Santa Ana	79%	21.8%
741.06	Santa Ana	62%	21.7%
883.01	Garden Grove	58%	21.6%
320.27	Lake Forest	44%	21.5%
218.12	Anaheim	33%	21.0%
760.00	Orange	51%	20.9%
760.00	Santa Ana	51%	20.9%
1103.02	Buena Park	63%	20.8%
885.01	Garden Grove	74%	20.8%
1102.02	Anaheim	61%	20.7%
1102.02	Buena Park	61%	20.7%
320.34	Rancho Santa Margarita	23%	20.6%
992.15	Huntington Beach	30%	20.3%
626.04	Irvine	11%	20.3%
110.00	Fullerton	40%	20.3%
863.03	Anaheim	53%	20.0%
993.06	Huntington Beach	20%	20.0%
992.32	Fountain Valley	29%	20.0%
886.01	Garden Grove	74%	20.0%
320.49	Rancho Santa Margarita	24%	20.0%
867.01	Anaheim	65%	19.7%
867.01	Fullerton	65%	19.7%
887.02	Garden Grove	76%	19.7%
863.01	Anaheim	74%	19.7%
869.03	Anaheim	63%	19.6%
995.14	Huntington Beach	17%	19.5%
746.01	Santa Ana	93%	19.5%
524.08	Irvine	22%	19.4%
524.08	Lake Forest	22%	19.4%
626.12	Irvine	31%	19.4%
1103.01	Buena Park	56%	18.9%
871.03	Anaheim	58%	18.8%
320.43	Rancho Santa Margarita	15%	18.8%
219.03	Anaheim	42%	18.6%
993.09	Huntington Beach	15%	18.6%

Table E-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by Census Tract
With 50+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
994.15	Huntington Beach	20%	18.5%
997.02	Huntington Beach	64%	18.5%
997.02	Westminster	64%	18.5%
525.27	Irvine	53%	18.5%
524.18	Irvine	48%	18.4%
634.00	Newport Beach	7%	17.9%
751.00	Santa Ana	78%	17.7%
883.02	Anaheim	47%	17.6%
883.02	Garden Grove	47%	17.6%
320.48	Rancho Santa Margarita	24%	17.6%
756.05	Orange	27%	17.3%
17.04	Fullerton	48%	17.3%
116.02	Anaheim	83%	17.3%
116.02	Fullerton	83%	17.3%
868.02	Anaheim	67%	17.2%
874.01	Anaheim	72%	16.8%
320.56	Rancho Santa Margarita	28%	16.5%
994.13	Huntington Beach	33%	16.5%
626.10	Irvine	41%	16.4%
626.10	Newport Beach	41%	16.4%
994.17	Huntington Beach	20%	16.3%
525.17	Irvine	41%	16.2%
630.07	Newport Beach	12%	16.0%
524.21	Irvine	28%	15.9%
1106.04	Buena Park	55%	15.7%
525.25	Irvine	42%	15.3%
219.23	Anaheim	37%	15.0%
13.03	La Habra	68%	15.0%
13.01	La Habra	43%	14.9%
524.25	Lake Forest	32%	14.9%
884.03	Anaheim	74%	14.6%
884.03	Garden Grove	74%	14.6%
888.02	Garden Grove	76%	14.3%
888.02	Westminster	76%	14.3%
524.17	Irvine	36%	14.3%
219.22	Anaheim	36%	14.3%
524.24	Lake Forest	33%	14.0%
992.31	Fountain Valley	30%	14.0%
16.01	Fullerton	26%	13.7%
16.01	La Habra	26%	13.7%

Table E-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by Census Tract
With 50+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
992.43	Huntington Beach	19%	13.0%
993.08	Huntington Beach	22%	12.9%
219.13	Orange	70%	12.7%
219.12	Anaheim	19%	12.5%
219.12	Orange	19%	12.5%
889.01	Garden Grove	77%	12.5%
889.01	Westminster	77%	12.5%
16.02	Fullerton	25%	12.0%
1106.03	Buena Park	78%	11.9%
524.20	Irvine	50%	11.9%
219.20	Anaheim	26%	11.7%
17.07	Fullerton	69%	11.3%
17.07	La Habra	69%	11.3%
879.01	Garden Grove	72%	9.2%
992.44	Huntington Beach	12%	7.8%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 1 Disposition of Applications, by Location of Property and Type of Loan, 2008

Table construction by Castañeda & Associates

Table E-3
Urban County Cities
FHA Loan Application Denial Rates by Census Tract
With 15+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
877.01	Unincorporated	54%	43.8%
423.10	Dana Point	37%	30.8%
878.02	Stanton	65%	29.4%
320.53	Unincorporated	23%	27.3%
881.01	Stanton	45%	26.7%
626.38	Aliso Viejo	29%	25.0%
219.13	Unincorporated	70%	25.0%
626.35	Aliso Viejo	28%	22.2%
626.35	Laguna Woods	28%	22.2%
320.23	Unincorporated	16%	19.4%
524.22	Unincorporated	26%	18.8%
320.56	Unincorporated	28%	18.5%
320.52	Unincorporated	13%	17.8%
867.01	Unincorporated	65%	16.7%
762.02	Unincorporated	39%	16.7%
878.06	Stanton	78%	16.7%
878.06	Unincorporated	78%	16.7%
1102.03	Stanton	41%	15.0%
524.27	Unincorporated	32%	13.3%
1103.01	La Palma	56%	11.8%
218.21	Placentia	46%	11.8%
218.12	Unincorporated	33%	11.1%
218.12	Yorba Linda	33%	11.1%
626.25	Aliso Viejo	39%	8.6%
626.25	Laguna Hills	39%	8.6%
626.25	Laguna Woods	39%	8.6%
626.37	Aliso Viejo	27%	6.3%
423.20	Aliso Viejo	33%	4.3%
423.20	Laguna Hills	33%	4.3%
762.08	Unincorporated	30%	4.0%
626.39	Aliso Viejo	30%	0.0%
524.28	Unincorporated	22%	0.0%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 1 Disposition of Applications, by Location of Property and Type of Loan, 2008

Table construction by Castañeda & Associates

Table E-4
Urban County Cities
Conventional Loan Application Denial Rates by Census Tract
With 50+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
218.27	Yorba Linda	31%	34.9%
626.21	Laguna Hills	30%	33.9%
626.21	Laguna Woods	30%	33.9%
422.01	Dana Point	20%	33.3%
626.43	Unincorporated	22%	29.9%
218.02	Yorba Linda	25%	28.4%
219.18	Unincorporated	38%	28.3%
762.08	Unincorporated	30%	27.8%
878.05	Stanton	68%	27.8%
878.05	Unincorporated	68%	27.8%
626.20	Laguna Beach	11%	27.1%
626.45	Unincorporated	17%	26.8%
218.16	Unincorporated	17%	26.2%
218.16	Yorba Linda	17%	26.2%
997.03	Unincorporated	48%	26.0%
1101.02	Cypress	56%	25.4%
1101.02	La Palma	56%	25.4%
758.13	Villa Park	36%	25.0%
881.01	Stanton	45%	24.6%
320.23	Unincorporated	16%	24.6%
423.35	Laguna Hills	29%	24.5%
423.35	Unincorporated	29%	24.5%
423.24	Dana Point	12%	24.1%
423.23	Dana Point	12%	24.0%
423.07	Laguna Hills	36%	23.7%
1102.03	Stanton	41%	23.5%
423.05	Dana Point	9%	23.5%
423.05	Laguna Beach	9%	23.5%
320.52	Unincorporated	13%	23.4%
15.01	Brea	27%	23.2%
15.01	Unincorporated	27%	23.2%
877.01	Unincorporated	54%	23.1%
423.38	Dana Point	14%	22.7%
626.22	Laguna Hills	11%	22.7%
626.22	Laguna Woods	11%	22.7%
218.21	Placentia	46%	22.7%
626.34	Aliso Viejo	26%	22.2%
756.04	Unincorporated	22%	22.2%
762.02	Unincorporated	39%	22.2%
15.05	Brea	31%	22.0%

Table E-4 continued
Urban County Cities
Conventional Loan Application Denial Rates by Census Tract
With 50+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
320.53	Unincorporated	23%	21.4%
218.12	Unincorporated	33%	21.0%
218.12	Yorba Linda	33%	21.0%
1102.02	Cypress	61%	20.7%
524.27	Unincorporated	32%	20.4%
626.04	Laguna Beach	11%	20.3%
626.04	Unincorporated	11%	20.3%
320.49	Unincorporated	24%	20.0%
756.03	Unincorporated	22%	20.0%
867.01	Unincorporated	65%	19.7%
756.06	Unincorporated	24%	19.7%
218.22	Yorba Linda	21%	19.7%
117.15	Placentia	27%	19.6%
117.15	Unincorporated	27%	19.6%
423.10	Dana Point	37%	19.6%
1103.01	La Palma	56%	18.9%
626.19	Laguna Beach	9%	18.9%
631.02	Unincorporated	19%	18.5%
997.02	Unincorporated	64%	18.5%
524.26	Unincorporated	30%	17.6%
422.05	Dana Point	23%	17.5%
756.05	Unincorporated	27%	17.3%
320.46	Unincorporated	14%	17.3%
626.35	Aliso Viejo	28%	17.2%
626.38	Aliso Viejo	29%	17.2%
626.35	Laguna Woods	28%	17.2%
423.20	Aliso Viejo	33%	16.7%
423.20	Laguna Hills	33%	16.7%
320.56	Unincorporated	28%	16.5%
994.17	Unincorporated	20%	16.3%
1100.08	Seal Beach	17%	16.1%
1100.08	Unincorporated	17%	16.1%
524.21	Unincorporated	28%	15.9%
626.23	Laguna Beach	8%	15.7%
626.23	Laguna Hills	8%	15.7%
626.23	Laguna Woods	8%	15.7%
1106.04	Unincorporated	55%	15.7%
626.39	Aliso Viejo	30%	15.3%
218.15	Brea	20%	15.2%
218.15	Placentia	20%	15.2%

Table E-4 continued
Urban County Cities
Conventional Loan Application Denial Rates by Census Tract
With 50+ Applications and by Percent Minority
Rank Ordered by Percent Denied – 2008

Census Tract	City	Percent Minority	Percent Denied
218.15	Unincorporated	20%	15.2%
218.15	Yorba Linda	20%	15.2%
626.25	Aliso Viejo	39%	14.3%
626.25	Laguna Hills	39%	14.3%
626.25	Laguna Woods	39%	14.3%
219.13	Unincorporated	70%	12.7%
626.41	Aliso Viejo	38%	12.5%
626.41	Laguna Woods	38%	12.5%
626.41	Unincorporated	38%	12.5%
219.12	Unincorporated	19%	12.5%
524.20	Unincorporated	50%	11.9%
320.44	Unincorporated	13%	11.8%
626.33	Aliso Viejo	26%	11.7%
17.07	Unincorporated	69%	11.3%
626.40	Aliso Viejo	27%	10.9%
879.01	Stanton	72%	9.2%
524.28	Unincorporated	22%	9.1%
626.37	Aliso Viejo	27%	7.7%
626.46	Laguna Woods	7%	1.4%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 1 Disposition of Applications, by Location of Property and Type of Loan, 2008

Table construction by Castañeda & Associates



Technical Appendix F

FHA and Conventional Loan Denial Rates by City and Census Tract

Table F-1
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
116.02	Anaheim	83%	57%	9	1	3	13	23.1%
117.14	Anaheim	81%	56%	0	0	1	1	100.0%
117.20	Anaheim	93%	47%	2	0	3	5	60.0%
117.22	Anaheim	67%	74%	5	0	1	6	16.7%
218.07	Anaheim	28%	100%	7	1	0	8	0.0%
218.12	Anaheim	33%	109%	15	1	2	18	11.1%
218.13	Anaheim	74%	82%	1	0	0	1	0.0%
219.03	Anaheim	42%	118%	9	1	2	12	16.7%
219.05	Anaheim	29%	144%	11	0	2	13	15.4%
219.12	Anaheim	19%	194%	0	0	0	0	0.0%
219.15	Anaheim	33%	151%	4	1	3	8	37.5%
219.16	Anaheim	24%	171%	1	0	0	1	0.0%
219.19	Anaheim	26%	153%	4	0	0	4	0.0%
219.20	Anaheim	26%	160%	8	0	0	8	0.0%
219.21	Anaheim	35%	180%	0	0	1	1	100.0%
219.22	Anaheim	36%	127%	10	2	2	14	14.3%
219.23	Anaheim	37%	157%	11	3	3	17	17.6%
219.24	Anaheim	43%	145%	2	1	2	5	40.0%
761.01	Anaheim	63%	79%	8	0	5	13	38.5%
761.02	Anaheim	64%	69%	0	0	0	0	0.0%
863.01	Anaheim	74%	78%	12	0	4	16	25.0%
863.03	Anaheim	53%	78%	30	4	5	39	12.8%
863.04	Anaheim	53%	93%	7	1	1	9	11.1%
863.05	Anaheim	44%	107%	8	0	2	10	20.0%
863.06	Anaheim	53%	92%	3	2	1	6	16.7%
864.02	Anaheim	68%	80%	12	1	1	14	7.1%
864.04	Anaheim	82%	71%	10	2	6	18	33.3%
864.05	Anaheim	83%	58%	7	1	4	12	33.3%
864.06	Anaheim	64%	74%	1	0	0	1	0.0%
864.07	Anaheim	58%	81%	17	4	6	27	22.2%
865.01	Anaheim	85%	57%	7	1	1	9	11.1%
865.02	Anaheim	92%	58%	6	3	5	14	35.7%
866.01	Anaheim	87%	53%	13	3	3	19	15.8%
867.01	Anaheim	65%	79%	24	1	5	30	16.7%
867.02	Anaheim	75%	61%	19	4	0	23	0.0%
868.01	Anaheim	50%	96%	17	0	5	22	22.7%
868.02	Anaheim	67%	71%	10	6	11	27	40.7%
868.03	Anaheim	58%	71%	11	0	2	13	15.4%
869.01	Anaheim	66%	55%	4	0	0	4	0.0%
869.02	Anaheim	51%	83%	6	1	1	8	12.5%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
869.03	Anaheim	63%	67%	6	1	1	8	12.5%
870.01	Anaheim	66%	67%	5	0	0	5	0.0%
870.02	Anaheim	59%	65%	16	1	9	26	34.6%
871.01	Anaheim	67%	66%	3	0	2	5	40.0%
871.02	Anaheim	78%	63%	5	0	0	5	0.0%
871.03	Anaheim	58%	83%	14	2	1	17	5.9%
871.05	Anaheim	62%	91%	1	0	1	2	50.0%
871.06	Anaheim	72%	72%	2	2	1	5	20.0%
872.00	Anaheim	65%	66%	5	2	3	10	30.0%
873.00	Anaheim	85%	57%	8	3	2	13	15.4%
874.01	Anaheim	72%	76%	26	3	4	33	12.1%
874.03	Anaheim	86%	49%	1	0	0	1	0.0%
874.04	Anaheim	91%	60%	1	0	0	1	0.0%
874.05	Anaheim	89%	52%	6	0	7	13	53.8%
875.01	Anaheim	80%	65%	7	1	3	11	27.3%
875.03	Anaheim	75%	66%	2	0	5	7	71.4%
875.04	Anaheim	87%	45%	1	0	0	1	0.0%
876.01	Anaheim	70%	64%	4	0	1	5	20.0%
876.02	Anaheim	62%	79%	11	1	3	15	20.0%
877.01	Anaheim	54%	82%	9	0	7	16	43.8%
877.03	Anaheim	72%	89%	10	1	3	14	21.4%
877.04	Anaheim	58%	80%	20	3	2	25	8.0%
878.01	Anaheim	56%	75%	10	1	2	13	15.4%
878.02	Anaheim	65%	70%	12	0	5	17	29.4%
878.03	Anaheim	87%	49%	4	0	2	6	33.3%
878.05	Anaheim	68%	67%	9	2	3	14	21.4%
878.06	Anaheim	78%	52%	12	3	3	18	16.7%
883.02	Anaheim	47%	88%	1	0	2	3	66.7%
884.02	Anaheim	75%	73%	0	0	4	4	100.0%
884.03	Anaheim	74%	80%	25	2	7	34	20.6%
1102.01	Anaheim	53%	84%	15	3	2	20	10.0%
1102.02	Anaheim	61%	68%	7	1	2	10	20.0%
1102.03	Anaheim	41%	88%	15	2	3	20	15.0%
1104.02	Anaheim	69%	65%	7	0	3	10	30.0%
Subtotal				611	79	186	876	21.2%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
18.01	Buena Park	71%	63%	5	0	2	7	28.6%
868.01	Buena Park	50%	96%	17	0	5	22	22.7%
1101.10	Buena Park	51%	80%	4	1	2	7	28.6%
1102.01	Buena Park	53%	84%	15	3	2	20	10.0%
1102.02	Buena Park	61%	68%	7	1	2	10	20.0%
1102.03	Buena Park	41%	88%	15	2	3	20	15.0%
1103.01	Buena Park	56%	101%	13	2	2	17	11.8%
1103.02	Buena Park	63%	85%	16	0	5	21	23.8%
1103.04	Buena Park	55%	89%	15	2	1	18	5.6%
1104.01	Buena Park	51%	89%	15	2	1	18	5.6%
1105.00	Buena Park	79%	56%	9	4	5	18	27.8%
1106.03	Buena Park	78%	57%	7	0	1	8	12.5%
1106.04	Buena Park	55%	102%	4	0	1	5	20.0%
1106.06	Buena Park	84%	46%	2	1	0	3	0.0%
1106.07	Buena Park	62%	66%	7	2	0	9	0.0%
Subtotal				151	20	32	203	15.8%
992.02	Fountain Vly.	83%	83%	6	0	0	6	0.0%
992.03	Fountain Vly.	75%	89%	1	0	1	2	50.0%
992.04	Fountain Vly.	65%	81%	1	0	0	1	0.0%
992.23	Fountain Vly.	69%	84%	0	0	0	0	0.0%
992.24	Fountain Vly.	42%	123%	0	0	0	0	0.0%
992.25	Fountain Vly.	42%	132%	1	0	0	1	0.0%
992.26	Fountain Vly.	56%	128%	1	0	0	1	0.0%
992.27	Fountain Vly.	61%	94%	9	2	4	15	26.7%
992.29	Fountain Vly.	41%	111%	3	4	7	14	50.0%
992.30	Fountain Vly.	26%	119%	8	1	2	11	18.2%
992.31	Fountain Vly.	30%	148%	3	0	0	3	0.0%
992.32	Fountain Vly.	29%	128%	2	0	0	2	0.0%
992.33	Fountain Vly.	36%	110%	2	0	1	3	33.3%
992.34	Fountain Vly.	35%	122%	4	1	2	7	28.6%
992.50	Fountain Vly.	38%	112%	0	0	0	0	0.0%
992.51	Fountain Vly.	52%	84%	1	0	0	1	0.0%
Subtotal				42	8	17	67	25.4%
15.03	Fullerton	38%	93%	2	0	1	3	33.3%
15.05	Fullerton	31%	115%	5	1	0	6	0.0%
16.01	Fullerton	26%	122%	4	0	0	4	0.0%
16.02	Fullerton	25%	161%	5	0	0	5	0.0%
17.04	Fullerton	48%	128%	3	0	3	6	50.0%
17.05	Fullerton	50%	98%	4	1	3	8	37.5%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
17.06	Fullerton	24%	174%	0	0	0	0	0.0%
17.07	Fullerton	69%	131%	4	0	0	4	0.0%
17.08	Fullerton	48%	143%	4	1	0	5	0.0%
18.01	Fullerton	71%	63%	5	0	2	7	28.6%
18.02	Fullerton	68%	61%	7	1	0	8	0.0%
19.01	Fullerton	52%	91%	6	2	3	11	27.3%
19.02	Fullerton	50%	78%	7	2	4	13	30.8%
19.03	Fullerton	56%	67%	5	0	1	6	16.7%
110.00	Fullerton	40%	92%	10	0	0	10	0.0%
111.01	Fullerton	55%	75%	5	1	2	8	25.0%
111.02	Fullerton	66%	88%	9	2	0	11	0.0%
112.00	Fullerton	37%	86%	5	0	0	5	0.0%
113.00	Fullerton	32%	95%	3	0	0	3	0.0%
114.01	Fullerton	29%	117%	0	0	0	0	0.0%
114.02	Fullerton	19%	141%	1	0	0	1	0.0%
114.03	Fullerton	54%	70%	8	1	0	9	0.0%
115.02	Fullerton	57%	66%	1	1	0	2	0.0%
115.03	Fullerton	26%	124%	1	1	0	2	0.0%
115.04	Fullerton	49%	58%	3	1	0	4	0.0%
116.01	Fullerton	78%	55%	2	0	3	5	60.0%
116.02	Fullerton	83%	57%	9	1	3	13	23.1%
117.07	Fullerton	29%	106%	11	0	3	14	21.4%
117.08	Fullerton	43%	74%	1	0	0	1	0.0%
117.11	Fullerton	62%	63%	6	2	4	12	33.3%
117.12	Fullerton	60%	80%	6	0	2	8	25.0%
867.01	Fullerton	65%	79%	24	1	5	30	16.7%
1106.05	Fullerton	71%	94%	5	0	0	5	0.0%
Subtotal				171	19	39	229	17.0%
761.03	Garden Gr.	78%	66%	3	0	1	4	25.0%
875.03	Garden Gr.	75%	66%	2	0	5	7	71.4%
876.02	Garden Gr.	62%	79%	11	1	3	15	20.0%
878.06	Garden Gr.	78%	52%	12	3	3	18	16.7%
879.01	Garden Gr.	72%	71%	11	0	1	12	8.3%
879.02	Garden Gr.	82%	67%	1	0	2	3	66.7%
880.01	Garden Gr.	61%	91%	3	0	0	3	0.0%
880.02	Garden Gr.	55%	100%	3	1	3	7	42.9%
881.01	Garden Gr.	45%	90%	10	1	4	15	26.7%
881.04	Garden Gr.	55%	75%	2	0	0	2	0.0%
881.05	Garden Gr.	61%	96%	2	0	4	6	66.7%
881.06	Garden Gr.	61%	59%	7	0	1	8	12.5%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
881.07	Garden Gr.	73%	63%	7	0	2	9	22.2%
882.01	Garden Gr.	54%	88%	1	1	1	3	33.3%
882.02	Garden Gr.	52%	110%	4	1	0	5	0.0%
882.03	Garden Gr.	58%	77%	2	0	0	2	0.0%
883.01	Garden Gr.	58%	78%	5	1	0	6	0.0%
883.02	Garden Gr.	47%	88%	1	0	2	3	66.7%
884.01	Garden Gr.	58%	91%	3	0	2	5	40.0%
884.02	Garden Gr.	75%	73%	0	0	4	4	100.0%
884.03	Garden Gr.	74%	80%	25	2	7	34	20.6%
885.01	Garden Gr.	74%	65%	4	0	4	8	50.0%
885.02	Garden Gr.	75%	74%	9	1	0	10	0.0%
886.01	Garden Gr.	74%	62%	5	0	2	7	28.6%
886.02	Garden Gr.	65%	72%	0	0	0	0	0.0%
887.01	Garden Gr.	77%	58%	4	0	2	6	33.3%
887.02	Garden Gr.	76%	59%	1	0	0	1	0.0%
888.01	Garden Gr.	81%	57%	12	1	2	15	13.3%
888.02	Garden Gr.	76%	76%	3	1	3	7	42.9%
889.01	Garden Gr.	77%	70%	1	0	0	1	0.0%
889.02	Garden Gr.	81%	78%	1	0	0	1	0.0%
889.03	Garden Gr.	86%	79%	0	0	2	2	100.0%
889.04	Garden Gr.	82%	97%	0	0	1	1	100.0%
890.01	Garden Gr.	90%	72%	2	1	1	4	25.0%
890.03	Garden Gr.	89%	62%	3	1	4	8	50.0%
891.02	Garden Gr.	82%	75%	11	1	6	18	33.3%
891.04	Garden Gr.	93%	43%	2	0	1	3	33.3%
891.06	Garden Gr.	82%	50%	1	0	0	1	0.0%
891.07	Garden Gr.	78%	89%	7	0	0	7	0.0%
999.02	Garden Gr.	55%	81%	3	1	0	4	0.0%
999.03	Garden Gr.	70%	67%	2	0	0	2	0.0%
999.05	Garden Gr.	33%	76%	2	0	1	3	33.3%
999.06	Garden Gr.	30%	122%	10	1	1	12	8.3%
1100.01	Garden Gr.	29%	111%	3	1	0	4	0.0%
1100.03	Garden Gr.	26%	115%	10	0	0	10	0.0%
1100.04	Garden Gr.	23%	120%	8	0	2	10	20.0%
1100.05	Garden Gr.	23%	126%	2	0	0	2	0.0%
Subtotal				221	20	77	318	24.2%
992.12	Hunt. Beach	42%	79%	6	1	1	8	12.5%
992.14	Hunt. Beach	23%	99%	4	0	0	4	0.0%
992.15	Hunt. Beach	30%	98%	6	1	2	9	22.2%
992.16	Hunt. Beach	25%	118%	3	1	2	6	33.3%
992.17	Hunt. Beach	17%	141%	5	2	0	7	0.0%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
992.20	Hunt. Beach	20%	102%	0	0	0	0	0.0%
992.35	Hunt. Beach	26%	105%	4	1	2	7	28.6%
992.37	Hunt. Beach	23%	124%	3	0	1	4	25.0%
992.38	Hunt. Beach	26%	156%	0	1	2	3	66.7%
992.39	Hunt. Beach	23%	152%	3	0	3	6	50.0%
992.40	Hunt. Beach	20%	132%	1	0	3	4	75.0%
992.41	Hunt. Beach	43%	98%	1	0	0	1	0.0%
992.42	Hunt. Beach	47%	103%	4	0	0	4	0.0%
992.43	Hunt. Beach	19%	122%	9	1	3	13	23.1%
992.44	Hunt. Beach	12%	136%	3	2	0	5	0.0%
992.45	Hunt. Beach	24%	126%	0	0	1	1	100.0%
992.46	Hunt. Beach	29%	151%	2	0	0	2	0.0%
993.05	Hunt. Beach	34%	71%	7	2	1	10	10.0%
993.06	Hunt. Beach	20%	91%	3	1	0	4	0.0%
993.07	Hunt. Beach	18%	88%	2	0	0	2	0.0%
993.08	Hunt. Beach	22%	236%	1	0	0	1	0.0%
993.09	Hunt. Beach	15%	139%	2	0	1	3	33.3%
993.10	Hunt. Beach	20%	159%	1	0	0	1	0.0%
993.11	Hunt. Beach	18%	126%	0	0	1	1	100.0%
994.02	Hunt. Beach	76%	57%	0	0	0	0	0.0%
994.04	Hunt. Beach	20%	136%	1	0	0	1	0.0%
994.05	Hunt. Beach	28%	104%	7	0	1	8	12.5%
994.06	Hunt. Beach	27%	112%	2	1	0	3	0.0%
994.07	Hunt. Beach	20%	122%	3	0	0	3	0.0%
994.08	Hunt. Beach	22%	115%	1	0	0	1	0.0%
994.10	Hunt. Beach	42%	80%	2	2	1	5	20.0%
994.11	Hunt. Beach	46%	74%	4	1	0	5	0.0%
994.12	Hunt. Beach	23%	119%	4	0	1	5	20.0%
994.13	Hunt. Beach	33%	134%	7	3	3	13	23.1%
994.15	Hunt. Beach	20%	161%	0	1	0	1	0.0%
994.16	Hunt. Beach	24%	88%	2	0	1	3	33.3%
994.17	Hunt. Beach	20%	129%	3	0	1	4	25.0%
995.08	Hunt. Beach	26%	87%	3	0	1	4	25.0%
995.13	Hunt. Beach	14%	187%	0	0	0	0	0.0%
995.14	Hunt. Beach	17%	197%	0	0	0	0	0.0%
996.02	Hunt. Beach	33%	106%	3	0	0	3	0.0%
996.03	Hunt. Beach	30%	111%	7	0	1	8	12.5%
996.04	Hunt. Beach	26%	116%	4	1	0	5	0.0%
996.05	Hunt. Beach	30%	127%	1	0	0	1	0.0%
997.02	Hunt. Beach	64%	88%	3	0	1	4	25.0%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract — 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
997.03	Hunt. Beach	48%	116%	1	0	2	3	66.7%
Subtotal				128	22	36	186	19.4%
524.08	Irvine	22%	140%	6	1	2	9	22.2%
524.10	Irvine	34%	94%	3	0	1	4	25.0%
524.17	Irvine	36%	150%	6	1	2	9	22.2%
524.18	Irvine	48%	77%	6	1	0	7	0.0%
524.20	Irvine	50%	183%	7	3	2	12	16.7%
524.21	Irvine	28%	154%	4	1	2	7	28.6%
525.05	Irvine	46%	100%	2	1	1	4	25.0%
525.06	Irvine	25%	153%	0	0	0	0	0.0%
525.11	Irvine	28%	134%	2	0	2	4	50.0%
525.13	Irvine	33%	133%	3	1	1	5	20.0%
525.14	Irvine	37%	130%	3	1	2	6	33.3%
525.15	Irvine	60%	130%	3	0	0	3	0.0%
525.17	Irvine	41%	102%	9	0	2	11	18.2%
525.18	Irvine	100%	0%	0	1	0	1	0.0%
525.19	Irvine	38%	110%	7	0	2	9	22.2%
525.20	Irvine	30%	135%	2	0	0	2	0.0%
525.21	Irvine	51%	87%	1	1	0	2	0.0%
525.22	Irvine	52%	143%	3	0	0	3	0.0%
525.23	Irvine	50%	152%	1	0	0	1	0.0%
525.25	Irvine	42%	137%	12	2	4	18	22.2%
525.26	Irvine	44%	132%	3	0	1	4	25.0%
525.27	Irvine	53%	142%	4	0	2	6	33.3%
525.28	Irvine	39%	123%	1	0	0	1	0.0%
626.04	Irvine	11%	177%	3	0	2	5	40.0%
626.10	Irvine	41%	105%	3	0	0	3	0.0%
626.11	Irvine	52%	86%	1	0	0	1	0.0%
626.12	Irvine	31%	124%	2	0	3	5	60.0%
626.14	Irvine	60%	94%	0	0	0	0	0.0%
626.26	Irvine	65%	63%	0	0	0	0	0.0%
626.27	Irvine	49%	82%	0	0	0	0	0.0%
626.28	Irvine	39%	158%	0	1	1	2	50.0%
626.29	Irvine	28%	162%	0	0	0	0	0.0%
626.30	Irvine	23%	185%	0	0	0	0	0.0%
626.31	Irvine	23%	239%	0	0	2	2	100.0%
755.15	Irvine	79%	62%	16	1	18	35	51.4%
Subtotal				113	16	52	181	28.7%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
11.01	La Habra	38%	108%	9	0	2	11	18.2%
11.02	La Habra	45%	94%	10	0	0	10	0.0%
11.03	La Habra	60%	75%	6	0	1	7	14.3%
12.01	La Habra	82%	57%	7	2	2	11	18.2%
12.02	La Habra	75%	65%	6	0	1	7	14.3%
13.01	La Habra	43%	92%	13	0	1	14	7.1%
13.03	La Habra	68%	75%	27	0	3	30	10.0%
13.04	La Habra	77%	57%	6	2	1	9	11.1%
14.01	La Habra	53%	78%	4	1	1	6	16.7%
14.02	La Habra	53%	90%	10	0	2	12	16.7%
14.03	La Habra	28%	119%	6	1	1	8	12.5%
14.04	La Habra	75%	69%	6	1	2	9	22.2%
15.01	La Habra	27%	125%	6	0	0	6	0.0%
16.01	La Habra	26%	122%	4	0	0	4	0.0%
17.05	La Habra	50%	98%	4	1	3	8	37.5%
17.07	La Habra	69%	131%	4	0	0	4	0.0%
17.08	La Habra	48%	143%	4	1	0	5	0.0%
Subtotal				132	9	20	161	12.4%
320.14	Lake Forest	47%	73%	9	1	5	15	33.3%
320.27	Lake Forest	44%	102%	36	10	14	60	23.3%
320.29	Lake Forest	30%	125%	12	1	4	17	23.5%
320.47	Lake Forest	26%	89%	7	0	1	8	12.5%
524.08	Lake Forest	22%	140%	6	1	2	9	22.2%
524.10	Lake Forest	34%	94%	3	0	1	4	25.0%
524.11	Lake Forest	49%	104%	10	3	3	16	18.8%
524.15	Lake Forest	19%	160%	4	1	1	6	16.7%
524.16	Lake Forest	34%	118%	17	3	4	24	16.7%
524.22	Lake Forest	26%	136%	13	0	3	16	18.8%
524.23	Lake Forest	34%	120%	5	1	0	6	0.0%
524.24	Lake Forest	33%	113%	10	1	2	13	15.4%
524.25	Lake Forest	32%	104%	12	1	1	14	7.1%
Subtotal				144	23	41	208	19.7%
626.10	Newport Bch.	41%	105%	3	0	0	3	0.0%
626.42	Newport Bch.	11%	166%	0	0	0	0	0.0%
626.43	Newport Bch.	22%	272%	0	0	1	1	100.0%
626.44	Newport Bch.	13%	214%	0	0	0	0	0.0%
626.45	Newport Bch.	17%	245%	1	0	0	1	0.0%
627.01	Newport Bch.	8%	200%	0	0	0	0	0.0%
627.02	Newport Bch.	8%	196%	0	0	0	0	0.0%
628.00	Newport Bch.	10%	135%	0	0	0	0	0.0%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
629.00	Newport Bch.	5%	221%	0	0	0	0	0.0%
630.04	Newport Bch.	10%	143%	0	0	0	0	0.0%
630.05	Newport Bch.	8%	190%	0	0	0	0	0.0%
630.06	Newport Bch.	7%	166%	0	0	0	0	0.0%
630.07	Newport Bch.	12%	211%	0	0	0	0	0.0%
630.08	Newport Bch.	11%	149%	0	0	0	0	0.0%
630.09	Newport Bch.	12%	199%	0	0	0	0	0.0%
630.10	Newport Bch.	13%	203%	0	2	0	2	0.0%
631.01	Newport Bch.	26%	94%	0	0	0	0	0.0%
631.03	Newport Bch.	12%	145%	1	0	0	1	0.0%
634.00	Newport Bch.	7%	153%	0	0	0	0	0.0%
635.00	Newport Bch.	11%	130%	0	0	0	0	0.0%
636.01	Newport Bch.	31%	103%	3	0	2	5	40.0%
636.03	Newport Bch.	14%	112%	2	0	1	3	33.3%
Subtotal				10	2	4	16	25.0%
219.12	Orange	19%	194%	0	0	0	0	0.0%
219.13	Orange	70%	96%	9	3	4	16	25.0%
219.14	Orange	44%	110%	4	0	0	4	0.0%
219.15	Orange	33%	151%	4	1	3	8	37.5%
219.17	Orange	18%	161%	2	0	0	2	0.0%
219.18	Orange	38%	120%	9	2	3	14	21.4%
756.04	Orange	22%	197%	4	0	1	5	20.0%
756.05	Orange	27%	177%	5	0	1	6	16.7%
758.05	Orange	42%	102%	6	0	1	7	14.3%
758.06	Orange	48%	90%	4	0	1	5	20.0%
758.07	Orange	52%	108%	5	1	6	12	50.0%
758.08	Orange	21%	129%	4	2	0	6	0.0%
758.09	Orange	21%	185%	0	0	1	1	100.0%
758.10	Orange	23%	186%	2	0	0	2	0.0%
758.11	Orange	58%	98%	2	0	0	2	0.0%
758.12	Orange	52%	86%	3	0	0	3	0.0%
758.13	Orange	36%	127%	5	1	2	8	25.0%
758.14	Orange	37%	176%	1	0	0	1	0.0%
758.15	Orange	34%	102%	11	2	1	14	7.1%
758.16	Orange	56%	98%	6	0	0	6	0.0%
759.01	Orange	50%	78%	6	0	5	11	45.5%
759.02	Orange	43%	75%	7	1	0	8	0.0%
760.00	Orange	51%	86%	23	2	3	28	10.7%
761.01	Orange	63%	79%	8	0	5	13	38.5%
761.02	Orange	64%	69%	0	0	0	0	0.0%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
761.03	Orange	78%	66%	3	0	1	4	25.0%
762.01	Orange	34%	105%	20	1	12	33	36.4%
762.02	Orange	39%	86%	16	4	4	24	16.7%
762.04	Orange	79%	61%	3	0	0	3	0.0%
762.05	Orange	46%	88%	6	0	4	10	40.0%
762.06	Orange	32%	96%	8	1	1	10	10.0%
762.08	Orange	30%	90%	22	2	1	25	4.0%
Subtotal				208	23	60	291	20.6%
320.34	Ran. St. Marg.	23%	195%	7	1	2	10	20.0%
320.42	Ran. St. Marg.	19%	165%	3	1	2	6	33.3%
320.43	Ran. St. Marg.	15%	230%	6	0	0	6	0.0%
320.48	Ran. St. Marg.	24%	133%	7	1	1	9	11.1%
320.49	Ran. St. Marg.	24%	158%	8	1	3	12	25.0%
320.50	Ran. St. Marg.	27%	128%	19	6	7	32	21.9%
320.51	Ran. St. Marg.	32%	97%	18	4	12	34	35.3%
320.53	Ran. St. Marg.	23%	130%	22	2	9	33	27.3%
320.54	Ran. St. Marg.	28%	103%	15	3	3	21	14.3%
320.55	Ran. St. Marg.	37%	106%	12	3	0	15	0.0%
320.56	Ran. St. Marg.	28%	163%	19	3	5	27	18.5%
Subtotal				136	25	44	205	21.5%
740.03	Santa Ana	95%	59%	9	0	5	14	35.7%
740.04	Santa Ana	73%	85%	16	1	2	19	10.5%
740.05	Santa Ana	86%	69%	2	0	1	3	33.3%
740.06	Santa Ana	75%	63%	25	2	4	31	12.9%
741.02	Santa Ana	93%	80%	12	3	4	19	21.1%
741.03	Santa Ana	93%	78%	13	2	5	20	25.0%
741.06	Santa Ana	62%	76%	12	4	7	23	30.4%
741.07	Santa Ana	43%	94%	2	0	0	2	0.0%
741.08	Santa Ana	43%	94%	2	0	0	2	0.0%
741.09	Santa Ana	95%	78%	2	0	3	5	60.0%
741.10	Santa Ana	78%	118%	5	0	2	7	28.6%
741.11	Santa Ana	81%	93%	6	2	2	10	20.0%
742.00	Santa Ana	95%	75%	13	1	8	22	36.4%
743.00	Santa Ana	97%	70%	4	2	2	8	25.0%
744.03	Santa Ana	95%	48%	0	0	0	0	0.0%
744.05	Santa Ana	95%	41%	6	0	5	11	45.5%
744.06	Santa Ana	92%	45%	5	0	2	7	28.6%
744.07	Santa Ana	93%	48%	7	0	5	12	41.7%
745.01	Santa Ana	99%	48%	1	0	4	5	80.0%
745.02	Santa Ana	97%	74%	6	0	5	11	45.5%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
746.01	Santa Ana	93%	55%	15	3	4	22	18.2%
746.02	Santa Ana	97%	59%	8	2	2	12	16.7%
747.01	Santa Ana	98%	72%	8	1	4	13	30.8%
747.02	Santa Ana	96%	71%	19	2	6	27	22.2%
748.01	Santa Ana	98%	60%	6	0	4	10	40.0%
748.02	Santa Ana	94%	49%	3	1	2	6	33.3%
748.03	Santa Ana	92%	66%	4	0	1	5	20.0%
748.05	Santa Ana	98%	49%	4	0	2	6	33.3%
748.06	Santa Ana	99%	49%	0	0	3	3	100.0%
749.01	Santa Ana	98%	46%	9	2	4	15	26.7%
749.02	Santa Ana	99%	45%	4	1	4	9	44.4%
750.02	Santa Ana	96%	47%	12	0	6	18	33.3%
750.03	Santa Ana	96%	41%	1	0	0	1	0.0%
750.04	Santa Ana	96%	42%	1	0	2	3	66.7%
751.00	Santa Ana	78%	51%	9	1	2	12	16.7%
752.01	Santa Ana	97%	71%	9	1	2	12	16.7%
752.02	Santa Ana	95%	59%	6	4	7	17	41.2%
753.01	Santa Ana	70%	80%	2	1	1	4	25.0%
753.02	Santa Ana	82%	67%	8	1	3	12	25.0%
753.03	Santa Ana	44%	112%	7	1	0	8	0.0%
754.01	Santa Ana	49%	112%	14	0	3	17	17.6%
754.03	Santa Ana	62%	76%	39	4	8	51	15.7%
754.04	Santa Ana	61%	77%	5	0	1	6	16.7%
754.05	Santa Ana	37%	76%	11	2	3	16	18.8%
755.15	Santa Ana	79%	62%	16	1	18	35	51.4%
757.01	Santa Ana	43%	94%	5	0	1	6	16.7%
758.06	Santa Ana	48%	90%	4	0	1	5	20.0%
759.02	Santa Ana	43%	75%	7	1	0	8	0.0%
760.00	Santa Ana	51%	86%	23	2	3	28	10.7%
889.03	Santa Ana	86%	79%	0	0	2	2	100.0%
890.01	Santa Ana	90%	72%	2	1	1	4	25.0%
890.04	Santa Ana	89%	56%	4	1	3	8	37.5%
891.02	Santa Ana	82%	75%	11	1	6	18	33.3%
891.04	Santa Ana	93%	43%	2	0	1	3	33.3%
891.05	Santa Ana	97%	45%	1	0	1	2	50.0%
891.07	Santa Ana	78%	89%	7	0	0	7	0.0%
992.02	Santa Ana	83%	83%	6	0	0	6	0.0%
992.03	Santa Ana	75%	89%	1	0	1	2	50.0%
992.47	Santa Ana	89%	76%	1	0	1	2	50.0%
992.48	Santa Ana	89%	55%	2	0	1	3	33.3%

Table F-1 continued
Entitlement Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total App.	Percent Denied
992.49	Santa Ana	97%	59%	0	0	0	0	0.0%
Subtotal				444	51	180	675	26.7%
888.02	Westminster	76%	76%	3	1	3	7	42.9%
889.01	Westminster	77%	70%	1	0	0	1	0.0%
889.04	Westminster	82%	97%	0	0	1	1	100.0%
889.05	Westminster	79%	85%	1	0	0	1	0.0%
992.03	Westminster	75%	89%	1	0	1	2	50.0%
992.04	Westminster	65%	81%	1	0	0	1	0.0%
992.22	Westminster	59%	77%	1	0	1	2	50.0%
992.23	Westminster	69%	84%	0	0	0	0	0.0%
992.41	Westminster	43%	98%	1	0	0	1	0.0%
996.01	Westminster	73%	62%	4	2	4	10	40.0%
996.02	Westminster	33%	106%	3	0	0	3	0.0%
996.03	Westminster	30%	111%	7	0	1	8	12.5%
997.01	Westminster	72%	80%	1	0	0	1	0.0%
997.02	Westminster	64%	88%	3	0	1	4	25.0%
997.03	Westminster	48%	116%	1	0	2	3	66.7%
998.01	Westminster	67%	82%	0	0	0	0	0.0%
998.02	Westminster	75%	54%	1	0	1	2	50.0%
998.03	Westminster	78%	62%	0	0	0	0	0.0%
999.02	Westminster	55%	81%	3	1	0	4	0.0%
999.03	Westminster	70%	67%	2	0	0	2	0.0%
999.04	Westminster	72%	56%	2	0	0	2	0.0%
999.05	Westminster	33%	76%	2	0	1	3	33.3%
999.06	Westminster	30%	122%	10	1	1	12	8.3%
Subtotal				48	5	17	70	24.3%
Total				2,436	314	790	3,540	22.3%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 1 Disposition of Applications, by Location of Property and Type of Loan, 2008

Table construction by Castañeda & Associates

Table F-2
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
116.02	Anaheim	83%	57%	37	6	9	52	17.3%
117.14	Anaheim	81%	56%	0	1	0	1	0.0%
117.20	Anaheim	93%	47%	11	3	12	26	46.2%
117.22	Anaheim	67%	74%	14	4	3	21	14.3%
218.07	Anaheim	28%	100%	17	5	4	26	15.4%
218.12	Anaheim	33%	109%	41	8	13	62	21.0%
218.13	Anaheim	74%	82%	0	3	0	3	0.0%
219.03	Anaheim	42%	118%	44	4	11	59	18.6%
219.05	Anaheim	29%	144%	25	5	16	46	34.8%
219.12	Anaheim	19%	194%	59	4	9	72	12.5%
219.15	Anaheim	33%	151%	27	6	8	41	19.5%
219.16	Anaheim	24%	171%	24	6	8	38	21.1%
219.19	Anaheim	26%	153%	20	8	7	35	20.0%
219.20	Anaheim	26%	160%	100	13	15	128	11.7%
219.21	Anaheim	35%	180%	37	7	14	58	24.1%
219.22	Anaheim	36%	127%	47	7	9	63	14.3%
219.23	Anaheim	37%	157%	82	14	17	113	15.0%
219.24	Anaheim	43%	145%	31	1	7	39	17.9%
761.01	Anaheim	63%	79%	14	3	7	24	29.2%
761.02	Anaheim	64%	69%	4	1	3	8	37.5%
863.01	Anaheim	74%	78%	34	15	12	61	19.7%
863.03	Anaheim	53%	78%	84	12	24	120	20.0%
863.04	Anaheim	53%	93%	24	3	8	35	22.9%
863.05	Anaheim	44%	107%	29	5	5	39	12.8%
863.06	Anaheim	53%	92%	19	2	5	26	19.2%
864.02	Anaheim	68%	80%	27	2	10	39	25.6%
864.04	Anaheim	82%	71%	38	9	19	66	28.8%
864.05	Anaheim	83%	58%	13	6	8	27	29.6%
864.06	Anaheim	64%	74%	12	1	1	14	7.1%
864.07	Anaheim	58%	81%	23	15	21	59	35.6%
865.01	Anaheim	85%	57%	16	1	7	24	29.2%
865.02	Anaheim	92%	58%	14	13	14	41	34.1%
866.01	Anaheim	87%	53%	29	5	13	47	27.7%
867.01	Anaheim	65%	79%	47	14	15	76	19.7%
867.02	Anaheim	75%	61%	38	13	16	67	23.9%
868.01	Anaheim	50%	96%	28	5	7	40	17.5%
868.02	Anaheim	67%	71%	38	10	10	58	17.2%
868.03	Anaheim	58%	71%	20	11	8	39	20.5%
869.01	Anaheim	66%	55%	14	7	3	24	12.5%
869.02	Anaheim	51%	83%	25	4	10	39	25.6%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
869.03	Anaheim	63%	67%	28	13	10	51	19.6%
870.01	Anaheim	66%	67%	15	3	9	27	33.3%
870.02	Anaheim	59%	65%	28	6	3	37	8.1%
871.01	Anaheim	67%	66%	9	2	7	18	38.9%
871.02	Anaheim	78%	63%	14	10	8	32	25.0%
871.03	Anaheim	58%	83%	57	8	15	80	18.8%
871.05	Anaheim	62%	91%	24	6	9	39	23.1%
871.06	Anaheim	72%	72%	17	5	5	27	18.5%
872.00	Anaheim	65%	66%	32	6	18	56	32.1%
873.00	Anaheim	85%	57%	32	11	26	69	37.7%
874.01	Anaheim	72%	76%	74	25	20	119	16.8%
874.03	Anaheim	86%	49%	5	2	3	10	30.0%
874.04	Anaheim	91%	60%	14	4	8	26	30.8%
874.05	Anaheim	89%	52%	11	1	5	17	29.4%
875.01	Anaheim	80%	65%	19	7	9	35	25.7%
875.03	Anaheim	75%	66%	23	10	12	45	26.7%
875.04	Anaheim	87%	45%	6	5	9	20	45.0%
876.01	Anaheim	70%	64%	16	4	9	29	31.0%
876.02	Anaheim	62%	79%	34	7	17	58	29.3%
877.01	Anaheim	54%	82%	31	9	12	52	23.1%
877.03	Anaheim	72%	89%	26	3	9	38	23.7%
877.04	Anaheim	58%	80%	41	11	16	68	23.5%
878.01	Anaheim	56%	75%	35	3	9	47	19.1%
878.02	Anaheim	65%	70%	31	5	11	47	23.4%
878.03	Anaheim	87%	49%	15	2	3	20	15.0%
878.05	Anaheim	68%	67%	29	10	15	54	27.8%
878.06	Anaheim	78%	52%	24	8	14	46	30.4%
883.02	Anaheim	47%	88%	39	3	9	51	17.6%
884.02	Anaheim	75%	73%	23	3	12	38	31.6%
884.03	Anaheim	74%	80%	118	17	23	158	14.6%
1102.01	Anaheim	53%	84%	33	12	15	60	25.0%
1102.02	Anaheim	61%	68%	43	3	12	58	20.7%
1102.03	Anaheim	41%	88%	49	3	16	68	23.5%
1104.02	Anaheim	69%	65%	18	2	7	27	25.9%
Subtotal				2,219	491	773	3,483	22.2%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
18.01	Buena Park	71%	63%	12	3	4	19	21.1%
868.01	Buena Park	50%	96%	28	5	7	40	17.5%
1101.10	Buena Park	51%	80%	30	3	3	36	8.3%
1102.01	Buena Park	53%	84%	33	12	15	60	25.0%
1102.02	Buena Park	61%	68%	43	3	12	58	20.7%
1102.03	Buena Park	41%	88%	49	3	16	68	23.5%
1103.01	Buena Park	56%	101%	42	1	10	53	18.9%
1103.02	Buena Park	63%	85%	34	8	11	53	20.8%
1103.04	Buena Park	55%	89%	32	4	9	45	20.0%
1104.01	Buena Park	51%	89%	38	6	15	59	25.4%
1105.00	Buena Park	79%	56%	24	12	18	54	33.3%
1106.03	Buena Park	78%	57%	53	6	8	67	11.9%
1106.04	Buena Park	55%	102%	55	15	13	83	15.7%
1106.06	Buena Park	84%	46%	5	1	3	9	33.3%
1106.07	Buena Park	62%	66%	15	3	9	27	33.3%
Subtotal				493	85	153	731	20.9%
992.02	Fountain Vly.	83%	83%	33	6	10	49	20.4%
992.03	Fountain Vly.	75%	89%	17	10	5	32	15.6%
992.04	Fountain Vly.	65%	81%	23	7	8	38	21.1%
992.23	Fountain Vly.	69%	84%	21	0	2	23	8.7%
992.24	Fountain Vly.	42%	123%	40	16	21	77	27.3%
992.25	Fountain Vly.	42%	132%	26	6	4	36	11.1%
992.26	Fountain Vly.	56%	128%	17	4	6	27	22.2%
992.27	Fountain Vly.	61%	94%	31	7	14	52	26.9%
992.29	Fountain Vly.	41%	111%	28	15	5	48	10.4%
992.30	Fountain Vly.	26%	119%	32	5	11	48	22.9%
992.31	Fountain Vly.	30%	148%	35	8	7	50	14.0%
992.32	Fountain Vly.	29%	128%	36	4	10	50	20.0%
992.33	Fountain Vly.	36%	110%	20	1	8	29	27.6%
992.34	Fountain Vly.	35%	122%	22	8	10	40	25.0%
992.50	Fountain Vly.	38%	112%	7	1	6	14	42.9%
992.51	Fountain Vly.	52%	84%	28	7	9	44	20.5%
Subtotal				416	105	136	657	20.7%
15.03	Fullerton	38%	93%	25	5	3	33	9.1%
15.05	Fullerton	31%	115%	59	12	20	91	22.0%
16.01	Fullerton	26%	122%	55	8	10	73	13.7%
16.02	Fullerton	25%	161%	40	4	6	50	12.0%
17.04	Fullerton	48%	128%	75	11	18	104	17.3%
17.05	Fullerton	50%	98%	23	8	7	38	18.4%
17.06	Fullerton	24%	174%	15	3	8	26	30.8%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
17.07	Fullerton	69%	131%	49	6	7	62	11.3%
17.08	Fullerton	48%	143%	24	9	9	42	21.4%
18.01	Fullerton	71%	63%	12	3	4	19	21.1%
18.02	Fullerton	68%	61%	21	6	9	36	25.0%
19.01	Fullerton	52%	91%	15	3	6	24	25.0%
19.02	Fullerton	50%	78%	20	3	6	29	20.7%
19.03	Fullerton	56%	67%	13	0	3	16	18.8%
110.00	Fullerton	40%	92%	44	7	13	64	20.3%
111.01	Fullerton	55%	75%	15	1	3	19	15.8%
111.02	Fullerton	66%	88%	20	2	8	30	26.7%
112.00	Fullerton	37%	86%	30	4	12	46	26.1%
113.00	Fullerton	32%	95%	12	0	0	12	0.0%
114.01	Fullerton	29%	117%	12	3	2	17	11.8%
114.02	Fullerton	19%	141%	20	3	6	29	20.7%
114.03	Fullerton	54%	70%	22	1	7	30	23.3%
115.02	Fullerton	57%	66%	14	4	3	21	14.3%
115.03	Fullerton	26%	124%	4	3	3	10	30.0%
115.04	Fullerton	49%	58%	10	4	2	16	12.5%
116.01	Fullerton	78%	55%	14	7	2	23	8.7%
116.02	Fullerton	83%	57%	37	6	9	52	17.3%
117.07	Fullerton	29%	106%	44	9	15	68	22.1%
117.08	Fullerton	43%	74%	18	2	5	25	20.0%
117.11	Fullerton	62%	63%	27	3	7	37	18.9%
117.12	Fullerton	60%	80%	19	2	12	33	36.4%
867.01	Fullerton	65%	79%	47	14	15	76	19.7%
1106.05	Fullerton	71%	94%	33	6	5	44	11.4%
Subtotal				888	162	245	1,295	18.9%
761.03	Garden Gr.	78%	66%	30	11	18	59	30.5%
875.03	Garden Gr.	75%	66%	23	10	12	45	26.7%
876.02	Garden Gr.	62%	79%	34	7	17	58	29.3%
878.06	Garden Gr.	78%	52%	24	8	14	46	30.4%
879.01	Garden Gr.	72%	71%	53	6	6	65	9.2%
879.02	Garden Gr.	82%	67%	25	4	9	38	23.7%
880.01	Garden Gr.	61%	91%	40	9	16	65	24.6%
880.02	Garden Gr.	55%	100%	31	8	9	48	18.8%
881.01	Garden Gr.	45%	90%	26	2	6	34	17.6%
881.04	Garden Gr.	55%	75%	11	1	3	15	20.0%
881.05	Garden Gr.	61%	96%	21	3	5	29	17.2%
881.06	Garden Gr.	61%	59%	21	11	6	38	15.8%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
881.07	Garden Gr.	73%	63%	26	3	8	37	21.6%
882.01	Garden Gr.	54%	88%	25	4	7	36	19.4%
882.02	Garden Gr.	52%	110%	34	7	7	48	14.6%
882.03	Garden Gr.	58%	77%	20	1	4	25	16.0%
883.01	Garden Gr.	58%	78%	33	7	11	51	21.6%
883.02	Garden Gr.	47%	88%	39	3	9	51	17.6%
884.01	Garden Gr.	58%	91%	46	4	16	66	24.2%
884.02	Garden Gr.	75%	73%	23	3	12	38	31.6%
884.03	Garden Gr.	74%	80%	118	17	23	158	14.6%
885.01	Garden Gr.	74%	65%	37	5	11	53	20.8%
885.02	Garden Gr.	75%	74%	27	14	12	53	22.6%
886.01	Garden Gr.	74%	62%	34	6	10	50	20.0%
886.02	Garden Gr.	65%	72%	25	6	12	43	27.9%
887.01	Garden Gr.	77%	58%	22	4	6	32	18.8%
887.02	Garden Gr.	76%	59%	41	12	13	66	19.7%
888.01	Garden Gr.	81%	57%	36	10	15	61	24.6%
888.02	Garden Gr.	76%	76%	75	3	13	91	14.3%
889.01	Garden Gr.	77%	70%	38	11	7	56	12.5%
889.02	Garden Gr.	81%	78%	22	13	17	52	32.7%
889.03	Garden Gr.	86%	79%	30	11	8	49	16.3%
889.04	Garden Gr.	82%	97%	29	6	8	43	18.6%
890.01	Garden Gr.	90%	72%	40	9	25	74	33.8%
890.03	Garden Gr.	89%	62%	17	8	15	40	37.5%
891.02	Garden Gr.	82%	75%	43	11	26	80	32.5%
891.04	Garden Gr.	93%	43%	5	1	6	12	50.0%
891.06	Garden Gr.	82%	50%	13	0	8	21	38.1%
891.07	Garden Gr.	78%	89%	25	6	11	42	26.2%
999.02	Garden Gr.	55%	81%	17	6	2	25	8.0%
999.03	Garden Gr.	70%	67%	32	3	5	40	12.5%
999.05	Garden Gr.	33%	76%	6	2	1	9	11.1%
999.06	Garden Gr.	30%	122%	36	4	7	47	14.9%
1100.01	Garden Gr.	29%	111%	25	6	5	36	13.9%
1100.03	Garden Gr.	26%	115%	22	3	11	36	30.6%
1100.04	Garden Gr.	23%	120%	28	6	2	36	5.6%
1100.05	Garden Gr.	23%	126%	18	5	5	28	17.9%
Subtotal				1,446	300	479	2,225	21.5%
992.12	Hunt. Beach	42%	79%	25	7	5	37	13.5%
992.14	Hunt. Beach	23%	99%	19	4	5	28	17.9%
992.15	Hunt. Beach	30%	98%	42	5	12	59	20.3%
992.16	Hunt. Beach	25%	118%	13	3	12	28	42.9%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
992.17	Hunt. Beach	17%	141%	27	5	9	41	22.0%
992.20	Hunt. Beach	20%	102%	16	5	9	30	30.0%
992.35	Hunt. Beach	26%	105%	14	1	6	21	28.6%
992.37	Hunt. Beach	23%	124%	27	5	9	41	22.0%
992.38	Hunt. Beach	26%	156%	13	3	8	24	33.3%
992.39	Hunt. Beach	23%	152%	20	1	7	28	25.0%
992.40	Hunt. Beach	20%	132%	20	4	4	28	14.3%
992.41	Hunt. Beach	43%	98%	16	4	3	23	13.0%
992.42	Hunt. Beach	47%	103%	19	11	8	38	21.1%
992.43	Hunt. Beach	19%	122%	63	4	10	77	13.0%
992.44	Hunt. Beach	12%	136%	38	9	4	51	7.8%
992.45	Hunt. Beach	24%	126%	20	6	6	32	18.8%
992.46	Hunt. Beach	29%	151%	25	1	3	29	10.3%
993.05	Hunt. Beach	34%	71%	31	4	7	42	16.7%
993.06	Hunt. Beach	20%	91%	46	6	13	65	20.0%
993.07	Hunt. Beach	18%	88%	24	3	12	39	30.8%
993.08	Hunt. Beach	22%	236%	52	9	9	70	12.9%
993.09	Hunt. Beach	15%	139%	58	12	16	86	18.6%
993.10	Hunt. Beach	20%	159%	33	3	14	50	28.0%
993.11	Hunt. Beach	18%	126%	48	6	17	71	23.9%
994.02	Hunt. Beach	76%	57%	17	5	14	36	38.9%
994.04	Hunt. Beach	20%	136%	18	5	12	35	34.3%
994.05	Hunt. Beach	28%	104%	16	3	6	25	24.0%
994.06	Hunt. Beach	27%	112%	31	4	10	45	22.2%
994.07	Hunt. Beach	20%	122%	22	3	6	31	19.4%
994.08	Hunt. Beach	22%	115%	34	5	11	50	22.0%
994.10	Hunt. Beach	42%	80%	17	3	3	23	13.0%
994.11	Hunt. Beach	46%	74%	9	2	1	12	8.3%
994.12	Hunt. Beach	23%	119%	19	2	8	29	27.6%
994.13	Hunt. Beach	33%	134%	62	14	15	91	16.5%
994.15	Hunt. Beach	20%	161%	35	9	10	54	18.5%
994.16	Hunt. Beach	24%	88%	28	7	16	51	31.4%
994.17	Hunt. Beach	20%	129%	56	16	14	86	16.3%
995.08	Hunt. Beach	26%	87%	24	0	8	32	25.0%
995.13	Hunt. Beach	14%	187%	14	3	9	26	34.6%
995.14	Hunt. Beach	17%	197%	53	13	16	82	19.5%
996.02	Hunt. Beach	33%	106%	20	3	5	28	17.9%
996.03	Hunt. Beach	30%	111%	35	5	14	54	25.9%
996.04	Hunt. Beach	26%	116%	19	8	5	32	15.6%
996.05	Hunt. Beach	30%	127%	19	3	4	26	15.4%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
997.02	Hunt. Beach	64%	88%	32	12	10	54	18.5%
997.03	Hunt. Beach	48%	116%	27	10	13	50	26.0%
Subtotal				1,316	256	418	1,990	21.0%
524.08	Irvine	22%	140%	48	10	14	72	19.4%
524.10	Irvine	34%	94%	34	9	15	58	25.9%
524.17	Irvine	36%	150%	56	16	12	84	14.3%
524.18	Irvine	48%	77%	136	28	37	201	18.4%
524.20	Irvine	50%	183%	204	47	34	285	11.9%
524.21	Irvine	28%	154%	45	13	11	69	15.9%
525.05	Irvine	46%	100%	19	6	12	37	32.4%
525.06	Irvine	25%	153%	20	2	1	23	4.3%
525.11	Irvine	28%	134%	32	8	6	46	13.0%
525.13	Irvine	33%	133%	26	6	6	38	15.8%
525.14	Irvine	37%	130%	27	4	6	37	16.2%
525.15	Irvine	60%	130%	94	22	35	151	23.2%
525.17	Irvine	41%	102%	76	17	18	111	16.2%
525.18	Irvine	100%	0%	2	1	0	3	0.0%
525.19	Irvine	38%	110%	21	8	7	36	19.4%
525.20	Irvine	30%	135%	26	3	3	32	9.4%
525.21	Irvine	51%	87%	17	7	5	29	17.2%
525.22	Irvine	52%	143%	14	5	3	22	13.6%
525.23	Irvine	50%	152%	16	3	6	25	24.0%
525.25	Irvine	42%	137%	101	15	21	137	15.3%
525.26	Irvine	44%	132%	21	9	7	37	18.9%
525.27	Irvine	53%	142%	42	11	12	65	18.5%
525.28	Irvine	39%	123%	10	3	2	15	13.3%
626.04	Irvine	11%	177%	196	47	62	305	20.3%
626.10	Irvine	41%	105%	155	24	35	214	16.4%
626.11	Irvine	52%	86%	10	3	9	22	40.9%
626.12	Irvine	31%	124%	49	5	13	67	19.4%
626.14	Irvine	60%	94%	22	3	3	28	10.7%
626.26	Irvine	65%	63%	4	0	0	4	0.0%
626.27	Irvine	49%	82%	24	4	5	33	15.2%
626.28	Irvine	39%	158%	12	12	4	28	14.3%
626.29	Irvine	28%	162%	17	3	6	26	23.1%
626.30	Irvine	23%	185%	8	1	1	10	10.0%
626.31	Irvine	23%	239%	30	3	12	45	26.7%
755.15	Irvine	79%	62%	214	40	71	325	21.8%
Subtotal				1,828	398	494	2,720	18.2%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
11.01	La Habra	38%	108%	39	3	7	49	14.3%
11.02	La Habra	45%	94%	25	9	10	44	22.7%
11.03	La Habra	60%	75%	13	1	3	17	17.6%
12.01	La Habra	82%	57%	20	9	11	40	27.5%
12.02	La Habra	75%	65%	11	2	7	20	35.0%
13.01	La Habra	43%	92%	46	11	10	67	14.9%
13.03	La Habra	68%	75%	44	7	9	60	15.0%
13.04	La Habra	77%	57%	15	9	11	35	31.4%
14.01	La Habra	53%	78%	19	4	2	25	8.0%
14.02	La Habra	53%	90%	24	7	7	38	18.4%
14.03	La Habra	28%	119%	15	4	4	23	17.4%
14.04	La Habra	75%	69%	19	11	5	35	14.3%
15.01	La Habra	27%	125%	45	8	16	69	23.2%
16.01	La Habra	26%	122%	55	8	10	73	13.7%
17.05	La Habra	50%	98%	23	8	7	38	18.4%
17.07	La Habra	69%	131%	49	6	7	62	11.3%
17.08	La Habra	48%	143%	24	9	9	42	21.4%
Subtotal				486	116	135	737	18.3%
320.14	Lake Forest	47%	73%	42	17	24	83	28.9%
320.27	Lake Forest	44%	102%	70	14	23	107	21.5%
320.29	Lake Forest	30%	125%	42	9	15	66	22.7%
320.47	Lake Forest	26%	89%	31	8	6	45	13.3%
524.08	Lake Forest	22%	140%	48	10	14	72	19.4%
524.10	Lake Forest	34%	94%	34	9	15	58	25.9%
524.11	Lake Forest	49%	104%	32	5	5	42	11.9%
524.15	Lake Forest	19%	160%	32	6	6	44	13.6%
524.16	Lake Forest	34%	118%	33	6	11	50	22.0%
524.22	Lake Forest	26%	136%	37	3	4	44	9.1%
524.23	Lake Forest	34%	120%	17	3	8	28	28.6%
524.24	Lake Forest	33%	113%	37	12	8	57	14.0%
524.25	Lake Forest	32%	104%	47	10	10	67	14.9%
Subtotal				502	112	149	763	19.5%
626.10	Newport Bch.	41%	105%	155	24	35	214	16.4%
626.42	Newport Bch.	11%	166%	23	7	8	38	21.1%
626.43	Newport Bch.	22%	272%	49	5	23	77	29.9%
626.44	Newport Bch.	13%	214%	44	11	18	73	24.7%
626.45	Newport Bch.	17%	245%	34	7	15	56	26.8%
627.01	Newport Bch.	8%	200%	29	8	7	44	15.9%
627.02	Newport Bch.	8%	196%	46	10	32	88	36.4%
628.00	Newport Bch.	10%	135%	15	4	8	27	29.6%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
629.00	Newport Bch.	5%	221%	13	2	6	21	28.6%
630.04	Newport Bch.	10%	143%	18	3	4	25	16.0%
630.05	Newport Bch.	8%	190%	1	1	2	4	50.0%
630.06	Newport Bch.	7%	166%	19	0	12	31	38.7%
630.07	Newport Bch.	12%	211%	32	10	8	50	16.0%
630.08	Newport Bch.	11%	149%	11	1	2	14	14.3%
630.09	Newport Bch.	12%	199%	13	5	5	23	21.7%
630.10	Newport Bch.	13%	203%	30	4	4	38	10.5%
631.01	Newport Bch.	26%	94%	10	5	1	16	6.3%
631.03	Newport Bch.	12%	145%	12	3	5	20	25.0%
634.00	Newport Bch.	7%	153%	44	20	14	78	17.9%
635.00	Newport Bch.	11%	130%	40	11	27	78	34.6%
636.01	Newport Bch.	31%	103%	21	5	9	35	25.7%
636.03	Newport Bch.	14%	112%	44	8	18	70	25.7%
Subtotal				703	154	263	1,120	23.5%
219.12	Orange	19%	194%	59	4	9	72	12.5%
219.13	Orange	70%	96%	44	11	8	63	12.7%
219.14	Orange	44%	110%	16	6	10	32	31.3%
219.15	Orange	33%	151%	27	6	8	41	19.5%
219.17	Orange	18%	161%	14	5	8	27	29.6%
219.18	Orange	38%	120%	36	7	17	60	28.3%
756.04	Orange	22%	197%	53	10	18	81	22.2%
756.05	Orange	27%	177%	54	8	13	75	17.3%
758.05	Orange	42%	102%	15	3	8	26	30.8%
758.06	Orange	48%	90%	30	3	4	37	10.8%
758.07	Orange	52%	108%	23	6	18	47	38.3%
758.08	Orange	21%	129%	21	3	3	27	11.1%
758.09	Orange	21%	185%	25	5	4	34	11.8%
758.10	Orange	23%	186%	23	6	4	33	12.1%
758.11	Orange	58%	98%	7	3	1	11	9.1%
758.12	Orange	52%	86%	27	6	3	36	8.3%
758.13	Orange	36%	127%	37	11	16	64	25.0%
758.14	Orange	37%	176%	27	6	6	39	15.4%
758.15	Orange	34%	102%	30	9	11	50	22.0%
758.16	Orange	56%	98%	29	4	2	35	5.7%
759.01	Orange	50%	78%	42	4	14	60	23.3%
759.02	Orange	43%	75%	23	10	4	37	10.8%
760.00	Orange	51%	86%	64	27	24	115	20.9%
761.01	Orange	63%	79%	14	3	7	24	29.2%
761.02	Orange	64%	69%	4	1	3	8	37.5%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
761.03	Orange	78%	66%	30	11	18	59	30.5%
762.01	Orange	34%	105%	74	17	26	117	22.2%
762.02	Orange	39%	86%	42	7	14	63	22.2%
762.04	Orange	79%	61%	14	7	8	29	27.6%
762.05	Orange	46%	88%	28	3	11	42	26.2%
762.06	Orange	32%	96%	33	3	15	51	29.4%
762.08	Orange	30%	90%	103	11	44	158	27.8%
Subtotal				1,068	226	359	1,653	21.7%
320.34	Ran. St. Mar.	23%	195%	41	9	13	63	20.6%
320.42	Ran. St. Mar.	19%	165%	32	9	6	47	12.85
320.43	Ran. St. Mar.	15%	230%	40	12	12	64	18.85
320.48	Ran. St. Mar.	24%	133%	50	6	12	68	17.6%
320.49	Ran. St. Mar.	24%	158%	74	10	21	105	20.0%
320.50	Ran. St. Mar.	27%	128%	65	13	33	111	29.7%
320.51	Ran. St. Mar.	32%	97%	45	11	29	85	34.1%
320.53	Ran. St. Mar.	23%	130%	125	35	69	229	30.1%
320.54	Ran. St. Mar.	28%	103%	50	13	34	97	35.1%
320.55	Ran. St. Mar.	37%	106%	51	9	36	96	37.5%
320.56	Ran. St. Mar.	28%	163%	65	21	17	103	16.5%
Subtotal				638	148	282	1,068	26.4%
740.03	Santa Ana	95%	59%	22	12	23	57	40.4%
740.04	Santa Ana	73%	85%	46	9	17	72	23.6%
740.05	Santa Ana	86%	69%	19	6	17	42	40.5%
740.06	Santa Ana	75%	63%	40	10	19	69	27.5%
741.02	Santa Ana	93%	80%	42	16	19	77	24.7%
741.03	Santa Ana	93%	78%	21	8	15	44	34.1%
741.06	Santa Ana	62%	76%	33	14	13	60	21.7%
741.07	Santa Ana	43%	94%	42	10	19	71	26.8%
741.08	Santa Ana	43%	94%	15	5	9	29	31.0%
741.09	Santa Ana	95%	78%	16	6	8	30	26.7%
741.10	Santa Ana	78%	118%	12	1	6	19	31.6%
741.11	Santa Ana	81%	93%	26	8	15	49	30.6%
742.00	Santa Ana	95%	75%	35	10	32	77	41.6%
743.00	Santa Ana	97%	70%	19	4	7	30	23.3%
744.03	Santa Ana	95%	48%	1	1	1	3	33.3%
744.05	Santa Ana	95%	41%	20	8	8	36	22.2%
744.06	Santa Ana	92%	45%	7	4	5	16	31.3%
744.07	Santa Ana	93%	48%	12	6	14	32	43.8%
745.01	Santa Ana	99%	48%	7	3	6	16	37.5%
745.02	Santa Ana	97%	74%	11	4	10	25	40.0%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
746.01	Santa Ana	93%	55%	47	15	15	77	19.5%
746.02	Santa Ana	97%	59%	24	5	23	52	44.2%
747.01	Santa Ana	98%	72%	26	10	21	57	36.8%
747.02	Santa Ana	96%	71%	28	4	18	50	36.0%
748.01	Santa Ana	98%	60%	19	4	15	38	39.5%
748.02	Santa Ana	94%	49%	14	5	15	34	44.1%
748.03	Santa Ana	92%	66%	42	5	14	61	23.0%
748.05	Santa Ana	98%	49%	7	5	4	16	25.0%
748.06	Santa Ana	99%	49%	10	0	5	15	33.3%
749.01	Santa Ana	98%	46%	33	4	26	63	41.3%
749.02	Santa Ana	99%	45%	9	8	17	34	50.0%
750.02	Santa Ana	96%	47%	23	14	21	58	36.2%
750.03	Santa Ana	96%	41%	4	4	1	9	11.1%
750.04	Santa Ana	96%	42%	1	1	2	4	50.0%
751.00	Santa Ana	78%	51%	37	14	11	62	17.7%
752.01	Santa Ana	97%	71%	22	7	15	44	34.1%
752.02	Santa Ana	95%	59%	23	6	23	52	44.2%
753.01	Santa Ana	70%	80%	23	10	10	43	23.3%
753.02	Santa Ana	82%	67%	23	5	9	37	24.3%
753.03	Santa Ana	44%	112%	20	6	13	39	33.3%
754.01	Santa Ana	49%	112%	28	4	5	37	13.5%
754.03	Santa Ana	62%	76%	59	3	31	93	33.3%
754.04	Santa Ana	61%	77%	22	7	9	38	23.7%
754.05	Santa Ana	37%	76%	10	4	2	16	12.5%
755.15	Santa Ana	79%	62%	214	40	71	325	21.8%
757.01	Santa Ana	43%	94%	32	2	7	41	17.1%
758.06	Santa Ana	48%	90%	30	3	4	37	10.8%
759.02	Santa Ana	43%	75%	23	10	4	37	10.8%
760.00	Santa Ana	51%	86%	64	27	24	115	20.9%
889.03	Santa Ana	86%	79%	30	11	8	49	16.3%
890.01	Santa Ana	90%	72%	40	9	25	74	33.8%
890.04	Santa Ana	89%	56%	43	13	17	73	23.3%
891.02	Santa Ana	82%	75%	43	11	26	80	32.5%
891.04	Santa Ana	93%	43%	5	1	6	12	50.0%
891.05	Santa Ana	97%	45%	15	8	6	29	20.7%
891.07	Santa Ana	78%	89%	25	6	11	42	26.2%
992.02	Santa Ana	83%	83%	33	6	10	49	20.4%
992.03	Santa Ana	75%	89%	17	10	5	32	15.6%
992.47	Santa Ana	89%	76%	10	10	11	31	35.5%
992.48	Santa Ana	89%	55%	14	3	10	27	37.0%

Table F-2 continued
Entitlement Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
992.49	Santa Ana	97%	59%	9	3	7	19	36.8%
Subtotal				1,647	468	840	2,955	28.4%
888.02	Westminster	76%	76%	75	3	13	91	14.3%
889.01	Westminster	77%	70%	38	11	7	56	12.5%
889.04	Westminster	82%	97%	29	6	8	43	18.6%
889.05	Westminster	79%	85%	29	5	5	39	12.8%
992.03	Westminster	75%	89%	17	10	5	32	15.6%
992.04	Westminster	65%	81%	23	7	8	38	21.1%
992.22	Westminster	59%	77%	26	5	8	39	20.5%
992.23	Westminster	69%	84%	21	0	2	23	8.7%
992.41	Westminster	43%	98%	16	4	3	23	13.0%
996.01	Westminster	73%	62%	28	11	19	58	32.8%
996.02	Westminster	33%	106%	20	3	5	28	17.9%
996.03	Westminster	30%	111%	35	5	14	54	25.9%
997.01	Westminster	72%	80%	23	5	7	35	20.0%
997.02	Westminster	64%	88%	32	12	10	54	18.5%
997.03	Westminster	48%	116%	27	10	13	50	26.0%
998.01	Westminster	67%	82%	30	3	21	54	38.9%
998.02	Westminster	75%	54%	7	7	8	22	36.4%
998.03	Westminster	78%	62%	25	5	8	38	21.1%
999.02	Westminster	55%	81%	17	6	2	25	8.0%
999.03	Westminster	70%	67%	32	3	5	40	12.5%
999.04	Westminster	72%	56%	20	4	4	28	14.3%
999.05	Westminster	33%	76%	6	2	1	9	11.1%
999.06	Westminster	30%	122%	36	4	7	47	14.9%
Subtotal				612	131	183	926	19.8%
TOTAL				14,262	3,152	4,909	22,323	22.0%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 1 Disposition of Applications, by Location of Property and Type of Loan, 2008

Table construction by Castañeda & Associates

Table F-3
Urban County Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
423.20	Aliso Viejo	33%	95%	22	0	1	23	4.3%
423.33	Aliso Viejo	32%	103%	7	2	1	10	10.0%
626.25	Aliso Viejo	39%	76%	29	3	3	35	8.6%
626.33	Aliso Viejo	26%	177%	10	1	2	13	15.4%
626.34	Aliso Viejo	26%	144%	8	4	2	14	14.3%
626.35	Aliso Viejo	28%	142%	12	2	4	18	22.2%
626.36	Aliso Viejo	33%	107%	2	1	2	5	40.0%
626.37	Aliso Viejo	27%	130%	14	1	1	16	6.3%
626.38	Aliso Viejo	29%	122%	10	2	4	16	25.0%
626.39	Aliso Viejo	30%	135%	24	5	0	29	0.0%
626.40	Aliso Viejo	27%	129%	8	0	2	10	20.0%
626.41	Aliso Viejo	38%	93%	7	5	2	14	14.3%
626.47	Aliso Viejo	22%	101%	1	0	1	2	50.0%
Subtotal				154	26	25	205	12.2%
14.03	Brea	28%	119%	6	1	1	8	12.5%
14.04	Brea	75%	69%	6	1	2	9	22.2%
15.01	Brea	27%	125%	6	0	0	6	0.0%
15.03	Brea	38%	93%	2	0	1	3	33.3%
15.04	Brea	49%	79%	3	2	0	5	0.0%
15.05	Brea	31%	115%	5	1	0	6	0.0%
15.06	Brea	31%	128%	4	0	1	5	20.0%
15.07	Brea	34%	92%	8	1	2	11	18.2%
117.09	Brea	22%	134%	1	0	0	1	0.0%
117.17	Brea	21%	113%	1	0	0	1	0.0%
218.14	Brea	31%	126%	5	0	1	6	16.7%
218.15	Brea	20%	125%	9	1	2	12	16.7%
Subtotal				56	7	10	73	13.7%
1100.01	Cypress	29%	111%	3	1	0	4	0.0%
1100.10	Cypress	37%	121%	2	0	0	2	0.0%
1100.11	Cypress	31%	149%	4	0	0	4	0.0%
1101.02	Cypress	56%	115%	3	0	0	3	0.0%
1101.04	Cypress	45%	100%	5	1	1	7	14.3%
1101.06	Cypress	32%	101%	2	0	1	3	33.3%
1101.09	Cypress	43%	100%	0	0	0	0	0.0%
1101.10	Cypress	51%	80%	4	1	2	7	28.6%
1101.11	Cypress	42%	98%	8	4	1	13	7.7%
1101.13	Cypress	46%	112%	0	0	0	0	0.0%
1101.14	Cypress	34%	110%	2	1	1	4	25.0%
1101.17	Cypress	39%	105%	0	0	1	1	100.0%
1101.18	Cypress	66%	173%	0	0	0	0	0.0%

Table F-3 continued
Urban County Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
1102.02	Cypress	61%	68%	7	1	2	10	20.0%
Subtotal				40	9	9	58	15.5%
422.01	Dana Point	20%	96%	2	1	4	7	57.1%
422.05	Dana Point	23%	125%	1	0	2	3	66.7%
422.06	Dana Point	11%	102%	1	0	2	3	66.7%
423.05	Dana Point	9%	176%	0	0	0	0	0.0%
423.10	Dana Point	37%	85%	16	2	8	26	30.8%
423.11	Dana Point	21%	127%	3	0	1	4	25.0%
423.13	Dana Point	38%	86%	1	0	1	2	50.0%
423.23	Dana Point	12%	129%	1	1	1	3	33.3%
423.24	Dana Point	12%	163%	2	0	0	2	0.0%
423.38	Dana Point	14%	135%	5	2	2	9	22.2%
423.39	Dana Point	25%	119%	1	0	0	1	0.0%
Subtotal				33	6	21	60	35.0%
1101.02	La Palma	56%	115%	3	0	0	3	0.0%
1101.11	La Palma	42%	98%	8	4	1	13	7.7%
1101.15	La Palma	63%	123%	4	1	0	5	0.0%
1101.16	La Palma	72%	107%	1	0	0	1	0.0%
1103.01	La Palma	56%	101%	13	2	2	17	11.8%
1103.04	La Palma	55%	102%	6	1	0	7	0.0%
Subtotal				35	8	3	46	6.5%
423.05	Laguna Bch.	9%	176%	0	0	0	0	0.0%
626.04	Laguna Bch.	11%	177%	3	0	2	5	40.0%
626.05	Laguna Bch.	16%	103%	0	0	1	1	100.0%
626.19	Laguna Bch.	9%	142%	0	0	0	0	0.0%
626.20	Laguna Bch.	11%	172%	0	0	1	1	100.0%
626.23	Laguna Bch.	8%	102%	3	0	1	4	25.0%
626.32	Laguna Bch.	12%	189%	0	0	0	0	0.0%
Subtotal				6	0	5	11	45.5%
423.07	Laguna Hills	36%	108%	5	1	1	7	14.3%
423.20	Laguna Hills	33%	95%	22	0	1	23	4.3%
423.27	Laguna Hills	23%	147%	2	0	0	2	0.0%
423.28	Laguna Hills	15%	217%	0	0	0	0	0.0%
423.33	Laguna Hills	32%	103%	7	2	1	10	10.0%
423.35	Laguna Hills	29%	110%	8	0	1	9	11.1%
626.21	Laguna Hills	30%	104%	4	3	3	10	30.0%
626.22	Laguna Hills	11%	71%	0	0	0	0	0.0%
626.23	Laguna Hills	8%	102%	3	0	1	4	25.0%
626.25	Laguna Hills	39%	76%	29	3	3	35	8.6%
626.47	Laguna Hills	22%	101%	1	0	1	2	50.0%
Subtotal				81	9	12	102	11.8%

Table F-3 continued
Urban County Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
626.21	Laguna Woods	30%	104%	4	3	3	10	30.0%
626.22	Laguna Woods	11%	71%	0	0	0	0	0.0%
626.23	Laguna Woods	8%	102%	3	0	1	4	25.0%
626.25	Laguna Woods	39%	76%	29	3	3	35	8.6%
626.35	Laguna Woods	28%	142%	12	2	4	18	22.2%
626.41	Laguna Woods	38%	93%	7	5	2	14	14.3%
626.46	Laguna Woods	7%	61%	0	0	0	0	0.0%
626.47	Laguna Woods	22%	101%	1	0	1	2	50.0%
Subtotal				56	13	14	83	16.9%
1100.07	Los Alamitos	15%	148%	1	0	0	1	0.0%
1100.12	Los Alamitos	24%	164%	2	0	0	2	0.0%
1100.14	Los Alamitos	38%	79%	1	1	1	3	33.3%
1100.15	Los Alamitos	22%	111%	1	0	1	2	50.0%
1101.06	Los Alamitos	32%	101%	2	0	1	3	33.3%
1101.08	Los Alamitos	34%	112%	0	0	0	0	0.0%
1101.13	Los Alamitos	46%	112%	0	0	0	0	0.0%
1101.17	Los Alamitos	39%	105%	0	0	1	1	100.0%
Subtotal				7	1	4	12	33.3%
117.08	Placentia	43%	74%	6	0	0	6	0.0%
117.09	Placentia	22%	134%	1	0	0	1	0.0%
117.10	Placentia	25%	123%	3	0	0	3	0.0%
117.11	Placentia	62%	63%	6	2	4	12	33.3%
117.12	Placentia	60%	80%	6	0	2	8	25.0%
117.15	Placentia	27%	134%	6	1	2	9	22.2%
117.17	Placentia	21%	113%	1	0	0	1	0.0%
117.18	Placentia	25%	127%	2	0	2	4	50.0%
117.20	Placentia	93%	47%	2	0	3	5	60.0%
117.21	Placentia	72%	61%	8	1	4	13	30.8%
117.22	Placentia	67%	74%	5	0	1	6	16.7%
218.10	Placentia	23%	112%	6	1	0	7	0.0%
218.13	Placentia	74%	82%	1	0	0	1	0.0%
218.15	Placentia	20%	125%	9	1	2	12	16.7%
218.20	Placentia	34%	133%	1	0	1	2	50.0%
218.21	Placentia	46%	102%	14	1	2	17	11.8%
Subtotal				77	7	23	107	21.5%
995.02	Seal Beach	62%	51%	0	0	0	0	0.0%
995.04	Seal Beach	12%	151%	0	0	0	0	0.0%
995.06	Seal Beach	13%	129%	0	0	0	0	0.0%
995.09	Seal Beach	6%	60%	0	0	0	0	0.0%
995.10	Seal Beach	8%	57%	0	0	0	0	0.0%

Table F-3 continued
Urban County Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
995.11	Seal Beach	14%	124%	0	0	0	0	0.0%
995.12	Seal Beach	18%	145%	1	1	1	3	33.3%
1100.07	Seal Beach	15%	148%	1	0	0	1	0.0%
1100.08	Seal Beach	17%	125%	1	0	1	2	50.0%
1100.12	Seal Beach	24%	164%	2	0	0	2	0.0%
Subtotal				5	1	2	8	25.0%
878.01	Stanton	56%	75%	10	1	2	13	15.4%
878.02	Stanton	65%	70%	12	0	5	17	29.4%
878.03	Stanton	87%	49%	4	0	2	6	33.3%
878.05	Stanton	68%	67%	9	2	3	14	21.4%
878.06	Stanton	78%	52%	12	3	3	18	16.7%
879.01	Stanton	72%	71%	11	0	1	12	8.3%
879.02	Stanton	82%	67%	1	0	2	3	66.7%
881.01	Stanton	45%	90%	10	1	4	15	26.7%
881.04	Stanton	55%	75%	2	0	0	2	0.0%
881.05	Stanton	61%	96%	2	0	4	6	66.7%
881.06	Stanton	61%	59%	7	0	1	8	12.5%
1101.13	Stanton	46%	112%	0	0	0	0	0.0%
1102.03	Stanton	41%	88%	15	2	3	20	15.0%
Subtotal				95	9	30	134	22.4%
758.09	Villa Park	21%	185%	0	0	1	1	100.0%
758.10	Villa Park	23%	186%	2	0	0	2	0.0%
758.11	Villa Park	58%	98%	2	0	0	2	0.0%
758.12	Villa Park	52%	86%	3	0	0	3	0.0%
758.13	Villa Park	36%	127%	5	1	2	8	25.0%
758.14	Villa Park	37%	176%	1	0	0	1	0.0%
Subtotal				13	1	3	17	17.6%
117.17	Yorba Linda	21%	113%	1	0	0	1	0.0%
117.18	Yorba Linda	25%	127%	2	0	2	4	50.0%
218.02	Yorba Linda	25%	122%	8	2	3	13	23.1%
218.09	Yorba Linda	18%	126%	2	0	0	2	0.0%
218.10	Yorba Linda	23%	112%	6	1	0	7	0.0%
218.12	Yorba Linda	33%	109%	15	1	2	18	11.1%
218.15	Yorba Linda	20%	125%	9	1	2	12	16.7%
218.16	Yorba Linda	17%	138%	9	1	2	12	16.7%
218.17	Yorba Linda	23%	122%	8	0	2	10	20.0%
218.20	Yorba Linda	34%	133%	1	0	1	2	50.0%
218.22	Yorba Linda	21%	143%	6	0	2	8	25.0%
218.23	Yorba Linda	26%	139%	4	0	0	4	0.0%
218.24	Yorba Linda	24%	168%	1	0	0	1	0.0%

Table F-3 continued
Urban County Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
218.25	Yorba Linda	26%	163%	3	1	0	4	0.0%
218.26	Yorba Linda	30%	105%	3	0	0	3	0.0%
218.27	Yorba Linda	31%	183%	4	2	1	7	14.3%
218.28	Yorba Linda	33%	197%	3	0	2	5	40.0%
218.29	Yorba Linda	29%	184%	1	0	0	1	0.0%
218.30	Yorba Linda	22%	169%	2	0	0	2	0.0%
219.24	Yorba Linda	43%	145%	2	1	2	5	40.0%
Subtotal				90	10	21	121	17.4%
11.01	Unincorp.	38%	108%	9	0	2	11	18.2%
12.01	Unincorp.	82%	57%	7	2	2	11	18.2%
14.01	Unincorp.	53%	78%	4	1	1	6	16.7%
14.02	Unincorp.	53%	90%	10	0	2	12	16.7%
15.01	Unincorp.	27%	125%	6	0	0	6	0.0%
15.06	Unincorp.	31%	128%	4	0	1	5	20.0%
17.07	Unincorp.	69%	131%	4	0	0	4	0.0%
19.03	Unincorp.	56%	67%	5	0	1	6	16.7%
117.11	Unincorp.	62%	63%	6	2	4	12	33.3%
117.15	Unincorp.	27%	134%	6	1	2	9	22.2%
117.18	Unincorp.	25%	127%	2	0	2	4	50.0%
218.12	Unincorp.	33%	109%	15	1	2	18	11.1%
218.15	Unincorp.	20%	125%	9	1	2	12	16.7%
218.16	Unincorp.	17%	138%	9	1	2	12	16.7%
218.17	Unincorp.	23%	122%	8	0	2	10	20.0%
219.12	Unincorp.	19%	194%	0	0	0	0	0.0%
219.13	Unincorp.	70%	96%	9	3	4	16	25.0%
219.14	Unincorp.	44%	110%	4	0	0	4	0.0%
219.17	Unincorp.	18%	161%	2	0	0	2	0.0%
219.18	Unincorp.	38%	120%	9	2	3	14	21.4%
219.24	Unincorp.	43%	145%	2	1	2	5	40.0%
320.11	Unincorp.	10%	162%	3	1	0	4	0.0%
320.23	Unincorp.	16%	157%	21	4	6	31	19.4%
320.41	Unincorp.	21%	212%	0	0	0	0	0.0%
320.42	Unincorp.	19%	165%	3	1	2	6	33.3%
320.44	Unincorp.	13%	255%	0	0	0	0	0.0%
320.45	Unincorp.	22%	151%	10	1	2	13	15.4%
320.46	Unincorp.	14%	262%	1	0	2	3	66.7%
320.49	Unincorp.	24%	158%	8	1	3	12	25.0%
320.52	Unincorp.	13%	203%	78	10	19	107	17.8%
320.53	Unincorp.	23%	130%	22	2	9	33	27.3%
320.56	Unincorp.	28%	163%	19	3	5	27	18.5%

Table F-3 continued
Urban County Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
423.35	Unincorp.	29%	110%	8	0	1	9	11.1%
524.04	Unincorp.	63%	107%	0	0	0	0	0.0%
524.20	Unincorp.	50%	183%	7	3	2	12	16.7%
524.21	Unincorp.	28%	154%	4	1	2	7	28.6%
524.22	Unincorp.	26%	136%	13	0	3	16	18.8%
524.26	Unincorp.	30%	161%	9	0	4	13	30.8%
524.27	Unincorp.	32%	150%	7	6	2	15	13.3%
524.28	Unincorp.	22%	149%	19	3	0	22	0.0%
626.04	Unincorp.	11%	177%	3	0	2	5	40.0%
626.41	Unincorp.	38%	93%	7	5	2	14	14.3%
626.43	Unincorp.	22%	272%	0	0	1	1	100.0%
626.45	Unincorp.	17%	245%	1	0	0	1	0.0%
630.09	Unincorp.	12%	199%	0	0	0	0	0.0%
631.01	Unincorp.	26%	94%	0	0	0	0	0.0%
631.02	Unincorp.	19%	100%	4	0	3	7	42.9%
631.03	Unincorp.	12%	145%	1	0	0	1	0.0%
755.04	Unincorp.	37%	112%	6	0	1	7	14.3%
755.06	Unincorp.	31%	121%	3	1	3	7	42.9%
756.03	Unincorp.	22%	122%	5	1	3	9	33.3%
756.04	Unincorp.	22%	197%	4	0	1	5	20.0%
756.05	Unincorp.	27%	177%	5	0	1	6	16.7%
756.06	Unincorp.	24%	207%	1	1	0	2	0.0%
757.01	Unincorp.	43%	94%	5	0	1	6	16.7%
757.02	Unincorp.	21%	125%	3	0	1	4	25.0%
757.03	Unincorp.	18%	150%	3	0	0	3	0.0%
758.07	Unincorp.	52%	108%	5	1	6	12	50.0%
758.08	Unincorp.	21%	129%	4	2	0	6	0.0%
762.02	Unincorp.	39%	86%	16	4	4	24	16.7%
762.04	Unincorp.	79%	61%	3	0	0	3	0.0%
762.08	Unincorp.	30%	90%	22	2	1	25	4.0%
867.01	Unincorp.	65%	79%	24	1	5	30	16.7%
871.01	Unincorp.	67%	66%	3	0	2	5	40.0%
877.01	Unincorp.	54%	82%	9	0	7	16	43.8%
877.03	Unincorp.	72%	89%	10	1	3	14	21.4%
878.01	Unincorp.	56%	75%	10	1	2	13	15.4%
878.05	Unincorp.	68%	67%	9	2	3	14	21.4%
878.06	Unincorp.	78%	52%	12	3	3	18	16.7%
879.02	Unincorp.	82%	67%	1	0	2	3	66.7%
992.30	Unincorp.	26%	119%	8	1	2	11	18.2%
994.17	Unincorp.	20%	129%	3	0	1	4	25.0%

Table F-3 continued
Urban County Cities
FHA Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	Apps. Denied	Total Apps.	Percent Denied
995.06	Unincorp.	13%	129%	0	0	0	0	0.0%
995.13	Unincorp.	14%	187%	0	0	0	0	0.0%
997.01	Unincorp.	72%	80%	1	0	0	1	0.0%
997.02	Unincorp.	64%	88%	3	0	1	4	25.0%
997.03	Unincorp.	48%	116%	1	0	2	3	66.7%
1100.06	Unincorp.	18%	149%	0	0	0	0	0.0%
1100.07	Unincorp.	15%	148%	1	0	0	1	0.0%
1100.08	Unincorp.	17%	125%	1	0	1	2	50.0%
1106.04	Unincorp.	55%	102%	4	0	1	5	20.0%
Subtotal				563	77	161	801	20.1%
TOTAL				1,311	184	343	1,838	18.7%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 1 Disposition of Applications, by Location of Property and Type of Loan, 2008

Table construction by Castañeda & Associates

Table F-4
Urban County Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	App. Denied	Total App.	Percent Denied
423.20	Aliso Viejo	33%	95%	58	17	15	90	16.7%
423.33	Aliso Viejo	32%	103%	29	6	7	42	16.7%
626.25	Aliso Viejo	39%	76%	83	7	15	105	14.3%
626.33	Aliso Viejo	26%	177%	77	14	12	103	11.7%
626.34	Aliso Viejo	26%	144%	57	13	20	90	22.2%
626.35	Aliso Viejo	28%	142%	65	7	15	87	17.2%
626.36	Aliso Viejo	33%	107%	30	5	12	47	25.5%
626.37	Aliso Viejo	27%	130%	50	10	5	65	7.7%
626.38	Aliso Viejo	29%	122%	63	9	15	87	17.2%
626.39	Aliso Viejo	30%	135%	123	27	27	177	15.3%
626.40	Aliso Viejo	27%	129%	41	8	6	55	10.9%
626.41	Aliso Viejo	38%	93%	79	12	13	104	12.5%
626.47	Aliso Viejo	22%	101%	36	5	1	42	2.4%
Subtotal				791	140	163	1,094	14.9%
14.03	Brea	28%	119%	15	4	4	23	17.4%
14.04	Brea	75%	69%	19	11	5	35	14.3%
15.01	Brea	27%	125%	45	8	16	69	23.2%
15.03	Brea	38%	93%	25	5	3	33	9.1%
15.04	Brea	49%	79%	24	2	6	32	18.8%
15.05	Brea	31%	115%	59	12	20	91	22.0%
15.06	Brea	31%	128%	32	7	6	45	13.3%
15.07	Brea	34%	92%	20	3	8	31	25.8%
117.09	Brea	22%	134%	19	2	5	26	19.2%
117.17	Brea	21%	113%	20	3	5	28	17.9%
218.14	Brea	31%	126%	29	5	3	37	8.1%
218.15	Brea	20%	125%	63	21	15	99	15.2%
Subtotal				370	83	96	549	17.5%
1100.01	Cypress	29%	111%	25	6	5	36	13.9%
1100.10	Cypress	37%	121%	30	3	3	36	8.3%
1100.11	Cypress	31%	149%	23	1	0	24	0.0%
1101.02	Cypress	56%	115%	42	5	16	63	25.4%
1101.04	Cypress	45%	100%	31	6	7	44	15.9%
1101.06	Cypress	32%	101%	27	5	5	37	13.5%
1101.09	Cypress	43%	100%	29	2	6	37	16.2%
1101.10	Cypress	51%	80%	23	3	5	31	16.1%
1101.11	Cypress	42%	98%	33	3	6	42	14.3%
1101.13	Cypress	46%	112%	11	2	2	15	13.3%
1101.14	Cypress	34%	110%	32	9	6	47	12.8%
1101.17	Cypress	39%	105%	15	2	8	25	32.0%
1101.18	Cypress	66%	173%	7	3	2	12	16.7%

Table F-4 continued
Urban County Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	App. Denied	Total App.	Percent Denied
1102.02	Cypress	61%	68%	43	3	12	58	20.7%
Subtotal				371	53	83	507	16.4%
422.01	Dana Point	20%	96%	41	9	25	75	33.3%
422.05	Dana Point	23%	125%	56	10	14	80	17.5%
422.06	Dana Point	11%	102%	32	5	7	44	15.9%
423.05	Dana Point	9%	176%	34	5	12	51	23.5%
423.10	Dana Point	37%	85%	64	14	19	97	19.6%
423.11	Dana Point	21%	127%	38	8	2	48	4.2%
423.13	Dana Point	38%	86%	24	7	7	38	18.4%
423.23	Dana Point	12%	129%	62	11	23	96	24.0%
423.24	Dana Point	12%	163%	29	15	14	58	24.1%
423.38	Dana Point	14%	135%	42	9	15	66	22.7%
423.39	Dana Point	25%	119%	27	7	6	40	15.0%
Subtotal				449	100	144	693	20.8%
1101.02	La Palma	56%	115%	42	5	16	63	25.4%
1101.11	La Palma	42%	98%	33	3	6	42	14.3%
1101.15	La Palma	63%	123%	12	3	2	17	11.8%
1101.16	La Palma	72%	107%	17	4	3	24	12.5%
1103.01	La Palma	56%	101%	42	1	10	53	18.9%
1103.04	La Palma	55%	102%	32	4	9	45	20.0%
Subtotal				178	20	46	244	18.9%
423.05	Laguna Bch.	9%	176%	34	5	12	51	23.5%
626.04	Laguna Bch.	11%	177%	196	47	62	305	20.3%
626.05	Laguna Bch.	16%	103%	16	4	7	27	25.9%
626.19	Laguna Bch.	9%	142%	33	10	10	53	18.9%
626.20	Laguna Bch.	11%	172%	45	6	19	70	27.1%
626.23	Laguna Bch.	8%	102%	72	14	16	102	15.7%
626.32	Laguna Bch.	12%	189%	25	5	16	46	34.8%
Subtotal				421	91	142	654	21.7%
423.07	Laguna Hills	36%	108%	42	3	14	59	23.7%
423.20	Laguna Hills	33%	95%	58	17	15	90	16.7%
423.27	Laguna Hills	23%	147%	26	5	8	39	20.5%
423.28	Laguna Hills	15%	217%	20	1	2	23	8.7%
423.33	Laguna Hills	32%	103%	29	6	7	42	16.7%
423.35	Laguna Hills	29%	110%	87	24	36	147	24.5%
626.21	Laguna Hills	30%	104%	63	15	40	118	33.9%
626.22	Laguna Hills	11%	71%	45	6	15	66	22.7%
626.23	Laguna Hills	8%	102%	72	14	16	102	15.7%
626.25	Laguna Hills	39%	76%	83	7	15	105	14.3%
626.47	Laguna Hills	22%	101%	36	5	1	42	2.4%
Subtotal				561	103	169	833	20.3%

Table F-4 continued
Urban County Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	App. Denied	Total App.	Percent Denied
626.21	Laguna Woods	30%	104%	63	15	40	118	33.9%
626.22	Laguna Woods	11%	71%	45	6	15	66	22.7%
626.23	Laguna Woods	8%	102%	72	14	16	102	15.7%
626.25	Laguna Woods	39%	76%	83	7	15	105	14.3%
626.35	Laguna Woods	28%	142%	65	7	15	87	17.2%
626.41	Laguna Woods	38%	93%	79	12	13	104	12.5%
626.46	Laguna Woods	7%	61%	71	1	1	73	1.4%
626.47	Laguna Woods	22%	101%	36	5	1	42	2.4%
Subtotal				514	67	116	697	16.6%
1100.07	Los Alamitos	15%	148%	22	9	5	36	13.9%
1100.12	Los Alamitos	24%	164%	33	5	4	42	9.5%
1100.14	Los Alamitos	38%	79%	15	1	0	16	0.0%
1100.15	Los Alamitos	22%	111%	29	7	6	42	14.3%
1101.06	Los Alamitos	32%	101%	27	5	5	37	13.5%
1101.08	Los Alamitos	34%	112%	11	0	2	13	15.4%
1101.13	Los Alamitos	46%	112%	11	2	2	15	13.3%
1101.17	Los Alamitos	39%	105%	15	2	8	25	32.0%
Subtotal				163	31	32	226	14.2%
117.08	Placentia	43%	74%	18	2	5	25	20.0%
117.09	Placentia	22%	134%	19	2	5	26	19.2%
117.10	Placentia	25%	123%	16	3	2	21	9.5%
117.11	Placentia	62%	63%	27	3	7	37	18.9%
117.12	Placentia	60%	80%	19	2	12	33	36.4%
117.15	Placentia	27%	134%	41	4	11	56	19.6%
117.17	Placentia	21%	113%	20	3	5	28	17.9%
117.18	Placentia	25%	127%	24	2	6	32	18.8%
117.20	Placentia	93%	47%	11	3	12	26	46.2%
117.21	Placentia	72%	61%	12	6	6	24	25.0%
117.22	Placentia	67%	74%	14	4	3	21	14.3%
218.10	Placentia	23%	112%	20	1	5	26	19.2%
218.13	Placentia	74%	82%	0	3	0	3	0.0%
218.15	Placentia	20%	125%	63	21	15	99	15.2%
218.20	Placentia	34%	133%	32	1	8	41	19.5%
218.21	Placentia	46%	102%	43	8	15	66	22.7%
Subtotal				379	68	117	564	20.7%
995.02	Seal Beach	62%	51%	1	0	0	1	0.0%
995.04	Seal Beach	12%	151%	15	2	10	27	37.0%
995.06	Seal Beach	13%	129%	3	1	7	11	63.6%
995.09	Seal Beach	6%	60%	3	0	1	4	25.0%
995.10	Seal Beach	8%	57%	0	1	0	1	0.0%

Table F-4 continued
Urban County Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	App. Denied	Total App.	Percent Denied
995.11	Seal Beach	14%	124%	17	3	0	20	0.0%
995.12	Seal Beach	18%	145%	15	7	6	28	21.4%
1100.07	Seal Beach	15%	148%	22	9	5	36	13.9%
1100.08	Seal Beach	17%	125%	45	7	10	62	16.1%
1100.12	Seal Beach	24%	164%	33	5	4	42	9.5%
Subtotal				154	35	43	232	18.5%
878.01	Stanton	56%	75%	35	3	9	47	19.1%
878.02	Stanton	65%	70%	31	5	11	47	23.4%
878.03	Stanton	87%	49%	15	2	3	20	15.0%
878.05	Stanton	68%	67%	29	10	15	54	27.8%
878.06	Stanton	78%	52%	24	8	14	46	30.4%
879.01	Stanton	72%	71%	53	6	6	65	9.2%
879.02	Stanton	82%	67%	25	4	9	38	23.7%
881.01	Stanton	45%	90%	40	9	16	65	24.6%
881.04	Stanton	55%	75%	11	1	3	15	20.0%
881.05	Stanton	61%	96%	21	6	5	32	15.6%
881.06	Stanton	61%	59%	21	11	6	38	15.8%
1101.13	Stanton	46%	112%	11	2	2	15	13.3%
1102.03	Stanton	41%	88%	49	3	16	68	23.5%
Subtotal				365	70	115	550	20.9%
758.09	Villa Park	21%	185%	25	5	4	34	11.8%
758.10	Villa Park	23%	186%	23	6	4	33	12.15
758.11	Villa Park	58%	98%	7	3	1	11	9.1%
758.12	Villa Park	52%	86%	27	6	3	36	8.3%
758.13	Villa Park	36%	127%	37	11	16	64	25.0%
758.14	Villa Park	37%	176%	27	6	6	39	15.4%
Subtotal				146	37	34	217	15.7%
117.17	Yorba Linda	21%	113%	20	3	5	28	17.9%
117.18	Yorba Linda	25%	127%	24	2	6	32	18.8%
218.02	Yorba Linda	25%	122%	52	16	27	95	28.4%
218.09	Yorba Linda	18%	126%	18	2	8	28	28.6%
218.10	Yorba Linda	23%	112%	20	1	5	26	19.2%
218.12	Yorba Linda	33%	109%	41	8	13	62	21.0%
218.15	Yorba Linda	20%	125%	63	21	15	99	15.2%
218.16	Yorba Linda	17%	138%	40	8	17	65	26.2%
218.17	Yorba Linda	23%	122%	24	10	5	39	12.8%
218.20	Yorba Linda	34%	133%	32	1	8	41	19.5%
218.22	Yorba Linda	21%	143%	150	46	48	244	19.7%
218.23	Yorba Linda	26%	139%	28	8	6	42	14.3%
218.24	Yorba Linda	24%	168%	11	4	2	17	11.8%

Table F-4 continued
Urban County Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	App. Denied	Total App.	Percent Denied
218.25	Yorba Linda	26%	163%	28	13	8	49	16.3%
218.26	Yorba Linda	30%	105%	29	5	2	36	5.6%
218.27	Yorba Linda	31%	183%	33	8	22	63	34.9%
218.28	Yorba Linda	33%	197%	29	7	2	38	5.3%
218.29	Yorba Linda	29%	184%	35	3	9	47	19.1%
218.30	Yorba Linda	22%	169%	32	8	3	43	7.0%
219.24	Yorba Linda	43%	145%	31	1	7	39	17.9%
Subtotal				740	175	218	1,133	19.2%
11.01	Unincorp.	38%	108%	39	3	7	49	14.3%
12.01	Unincorp.	82%	57%	20	9	11	40	27.5%
14.01	Unincorp.	53%	78%	19	4	2	25	8.0%
14.02	Unincorp.	53%	90%	24	7	7	38	18.4%
15.01	Unincorp.	27%	125%	45	8	16	69	23.2%
15.06	Unincorp.	31%	128%	32	7	6	45	13.3%
17.07	Unincorp.	69%	131%	49	6	7	62	11.3%
19.03	Unincorp.	56%	67%	13	0	3	16	18.8%
117.11	Unincorp.	62%	63%	27	3	7	37	18.9%
117.15	Unincorp.	27%	134%	41	4	11	56	19.6%
117.18	Unincorp.	25%	127%	24	2	6	32	18.8%
218.12	Unincorp.	33%	109%	41	8	13	62	21.0%
218.15	Unincorp.	20%	125%	63	21	15	99	15.2%
218.16	Unincorp.	17%	138%	40	8	17	65	26.2%
218.17	Unincorp.	23%	122%	24	10	5	39	12.8%
219.12	Unincorp.	19%	194%	59	4	9	72	12.5%
219.13	Unincorp.	70%	96%	44	11	8	63	12.7%
219.14	Unincorp.	44%	110%	16	6	10	32	31.3%
219.17	Unincorp.	18%	161%	14	5	8	27	29.6%
219.18	Unincorp.	38%	120%	36	7	17	60	28.3%
219.24	Unincorp.	43%	145%	31	1	7	39	17.9%
320.11	Unincorp.	10%	162%	8	1	4	13	30.8%
320.23	Unincorp.	16%	157%	206	67	89	362	24.6%
320.41	Unincorp.	21%	212%	7	5	4	16	25.0%
320.42	Unincorp.	19%	165%	32	9	6	47	12.8%
320.44	Unincorp.	13%	255%	53	14	9	76	11.8%
320.45	Unincorp.	22%	151%	19	3	6	28	21.4%
320.46	Unincorp.	14%	262%	81	24	22	127	17.3%
320.49	Unincorp.	24%	158%	74	10	21	105	20.0%
320.52	Unincorp.	13%	203%	363	76	134	573	23.4%
320.53	Unincorp.	23%	130%	97	17	31	145	21.4%
320.56	Unincorp.	28%	163%	65	21	17	103	16.5%

Table F-4 continued
Urban County Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	App. Denied	Total App.	Percent Denied
423.35	Unincorp.	29%	110%	87	24	36	147	24.5%
524.04	Unincorp.	63%	107%	4	0	1	5	20.0%
524.20	Unincorp.	50%	183%	204	47	34	285	11.9%
524.21	Unincorp.	28%	154%	45	13	11	69	15.9%
524.22	Unincorp.	26%	136%	27	3	4	34	11.8%
524.26	Unincorp.	30%	161%	155	27	39	221	17.6%
524.27	Unincorp.	32%	150%	57	17	19	93	20.4%
524.28	Unincorp.	22%	149%	56	4	6	66	9.1%
626.04	Unincorp.	11%	177%	196	47	62	305	20.3%
626.41	Unincorp.	38%	93%	79	12	13	104	12.5%
626.43	Unincorp.	22%	272%	49	5	23	77	29.9%
626.45	Unincorp.	17%	245%	34	7	15	56	26.8%
630.09	Unincorp.	12%	199%	13	5	5	23	21.7%
631.01	Unincorp.	26%	94%	10	5	1	16	6.3%
631.02	Unincorp.	19%	100%	54	12	15	81	18.5%
631.03	Unincorp.	12%	145%	12	3	5	20	25.0%
755.04	Unincorp.	37%	122%	23	4	7	34	20.6%
755.06	Unincorp.	31%	121%	25	1	6	32	18.8%
756.03	Unincorp.	22%	122%	29	15	11	55	20.0%
756.04	Unincorp.	22%	197%	53	10	18	81	22.2%
756.05	Unincorp.	27%	177%	54	8	13	75	17.3%
756.06	Unincorp.	24%	207%	50	7	14	71	19.7%
757.01	Unincorp.	43%	94%	32	2	7	41	17.1%
757.02	Unincorp.	21%	125%	25	3	14	42	33.3%
757.03	Unincorp.	18%	150%	33	4	9	46	19.6%
758.07	Unincorp.	52%	108%	23	6	18	47	38.3%
758.08	Unincorp.	21%	129%	21	3	3	27	11.1%
762.02	Unincorp.	39%	86%	42	7	14	63	22.2%
762.04	Unincorp.	79%	61%	14	7	8	29	27.6%
762.08	Unincorp.	30%	90%	103	11	44	158	27.8%
867.01	Unincorp.	65%	79%	47	14	15	76	19.7%
871.01	Unincorp.	67%	66%	9	2	7	18	38.9%
877.01	Unincorp.	54%	82%	31	9	12	52	23.1%
877.03	Unincorp.	72%	89%	26	3	9	38	23.7%
878.01	Unincorp.	56%	75%	35	3	9	47	19.1%
878.05	Unincorp.	68%	67%	29	10	15	54	27.8%
878.06	Unincorp.	78%	52%	24	8	14	46	30.4%
879.02	Unincorp.	82%	67%	25	4	9	38	23.7%
992.30	Unincorp.	26%	119%	32	5	11	48	22.9%

Table F-4 continued
Urban County Cities
Conventional Loan Application Denial Rates by City and Census Tract – 2008

Census Tract	City	Percent Minority	Med. Income as % of MSA	Loans Originated	App. Approved But Not Accepted	App. Denied	Total App.	Percent Denied
994.17	Unincorp.	20%	129%	56	16	14	86	16.3%
995.06	Unincorp.	13%	129%	3	1	7	11	63.6%
995.13	Unincorp.	14%	187%	14	3	9	26	34.6%
997.01	Unincorp.	72%	80%	23	5	7	35	20.0%
997.02	Unincorp.	64%	88%	32	12	10	54	18.5%
997.03	Unincorp.	48%	116%	27	10	13	50	26.0%
1100.06	Unincorp.	18%	149%	24	4	4	32	12.5%
1100.07	Unincorp.	15%	148%	22	9	5	36	13.9%
1100.08	Unincorp.	17%	125%	45	7	10	62	16.1%
1106.04	Unincorp.	55%	102%	55	15	13	83	15.7%
Subtotal				3,874	840	1,203	5,917	20.3%
TOTAL				9,476	1,913	2,721	14,110	19.3%

Source: Federal Financial Institutions Examination Council, Home Mortgage Disclosure Act: Aggregate Table 1 Disposition of Applications, by Location of Property and Type of Loan, 2008

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Technical Appendix G

Survey of Zoning and Planning Codes, Policies and Practices that May Pose an Impediment to Fair Housing Choice



201 S. Broadway • Santa Ana, CA 92701
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SURVEY OF ZONING AND PLANNING CODES, POLICIES AND PRACTICES **THAT MAY POSE AN IMPEDIMENT TO FAIR HOUSING CHOICE**

Name of Jurisdiction: City of Newport Beach
Completing Department: Planning Department
Completed By: Melinda Whelan
Date Completed: 4/19/2010

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 24 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 and local developers of housing. 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

[NOTE: For document automation please enable macros and then double click check boxes to check or uncheck]

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

Background

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 situating of group homes for individuals with

disabilities (but not families similarly sized and situated). Such definitions are prohibited because they could have the effect 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.

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* who were allowed to do so to five. Under the invalidated 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.

For example, a city may have a definition of 'family' as follows:

"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. *[emphasis added]*

A definition of family should look to whether the household functions as a cohesive unit instead of distinguishing between related and unrelated persons.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

The Zoning Code definition of "family" is: "One or more persons living together as a single housekeeping unit in a dwelling unit."

A "single housekeeping unit" is defined as: "The functional equivalent of a traditional family, whose members are an interactive group of persons jointly occupying a single dwelling unit, including the joint use of and responsibility for common areas, and sharing household activities and responsibilities such as meals, chores, household maintenance, and expenses, and where, if the unit is rented, all adult residents have chosen to jointly occupy the entire premises of the dwelling unit, under a single written lease with joint use and responsibility for the premises, and the makeup of the household occupying the unit is determined by the residents of the unit rather than the landlord or property manager."

The definition of "family" or "single housekeeping unit" does not have the effect of discriminating against unrelated individuals, or individuals with disabilities who reside together in a congregate or group living arrangement.

2. Does the code definition of "dwelling unit" or "residential unit" have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement?

Yes No

Background

The definition of a "dwelling unit" or "residential unit" may exclude or restrict housing opportunities for individuals with disabilities by mischaracterizing congregate or group

living arrangements as “boarding or rooming house” a “hotel” or a “residential care facility”. Both State and Federal fair housing laws prohibit definitions of dwelling that either *intentionally* discriminate against people with disabilities or *have the effect* of excluding such individuals from housing. Generally, all dwellings are covered by fair housing laws, with a “dwelling” being defined as “a temporary or permanent dwelling place, abode or habitation to which one intends to return as distinguished from the place of temporary sojourn or transient visit.”

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

The Zoning Code definition of a “dwelling unit” is: Any area within a structure on any parcel which:

A.

Contains separate or independent living facilities for one or more persons, with area or equipment for sleeping, sanitation and food preparation, and which has independent exterior access to ground level; or

B.

Is being utilized for residential purposes by one or more persons separately or independently from occupants of other areas within the structure.

This definition does not have the effect of excluding or restricting housing opportunities for individuals with disabilities, or discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement.

3. Does the code or any policy document define “disability”, if at all, at least as broadly as the federal Fair Housing Act? Yes No

Background

The federal Fair Housing Act (FHA) defines disability/handicap as follows:

“Handicap” means, with respect to a person--

- (1) a physical or mental impairment which substantially limits one or more of such person's major life activities,
- (2) a record of having such an impairment, or
- (3) being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)).

The term “physical or mental impairment” 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.

The California Fair Employment and Housing Act (FEHA) definition is somewhat broader, in that removes the word "substantially". The FEHA definition is:

- (1) A physical or mental impairment that limits one or more of a person's major life activities
- (2) A record of having, or being perceived as having, a physical or mental impairment. It does not include current illegal use of, or addiction to, a controlled substance (as defined by Section 102 of the Federal Controlled Substance Act, 21 U.S.C. Sec. 802).

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

The Zoning Code definition of "individual with a disability" is: "As more specifically defined under the fair housing laws, a person who has a physical or mental impairment that limits one or more major life activities, a person who is regarded as having that type of impairment, or a person who has a record of that type of impairment, not including current, illegal use of a controlled substance."

This definition of disability is similar to the FEHA definition.

4. Are personal characteristics of residents, including, but not necessarily limited to, disability, considered? Yes No

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 people, 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 conditional use permit or 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 the Department of Justice and the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, pages 2 and 3.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

Except when granting access to disabled individuals and groups that exceeds housing access granted to other similarly situated groups, the code does not consider the characteristics of the residents of a dwelling. Instead, the code considers whether or not a group of individuals are residing in the dwelling as a single housekeeping unit. A group of individuals living as a single housekeeping unit, whether disabled or nondisabled, can live together in any district zoned for residential use in the City.

5. Does the code limit housing opportunities for disabled individuals through restrictions on the provision of on-site supportive services?

Yes No

Background

Housing for disabled persons, to be sustainable, successful and to allow them to fully use and enjoy the housing, 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."

Joint Statement of the Department of Justice and the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, page 2.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

The code places no restrictions on the provision of any on-site supportive services required by disabled individuals.

6. Does the jurisdiction policy have more restrictive limits for occupancies involving disabled residents than for other occupancies of unrelated, non-disabled persons?

Yes No

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."

Joint Statement of the Department of Justice and the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, page 3.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

The code does not consider whether groups living together are related or unrelated. In addition, for groups not living as a single housekeeping unit, the code provides more favorable treatment to disabled groups than non-disabled groups. Licensed residential care facilities housing six or fewer individuals can locate in any residential zone in the City. Although all other groups not living as single housekeeping units are prohibited in all residential zones of the City, the City makes an exception for groups of disabled individuals. The code provides use permit and reasonable accommodation procedures that allow groups of disabled individuals not living as single housekeeping units to establish residences in residential zones within the City.

7. 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?

Yes X No

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 the Department of Justice and the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, pages 4 and 5.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

Zoning Code Chapter 20.98 provides for reasonable accommodation.

8. If the jurisdiction supplies or manages housing, is there a clear policy to allow disabled persons residing in or seeking to reside in the housing to make or request reasonable physical modifications or to request reasonable accommodations? Yes No N/A X

If 'Yes', is the policy communicated to applicants or residents?

Yes No

Explanation of Answer Given Above

Please provide a brief description of the policy, its dissemination and its process:

9. Does the jurisdiction require a public hearing for disabled persons seeking specific exceptions to zoning and land-use rules (variances) necessary for them to be able fully use and enjoy housing?

Yes No

If 'Yes', is the process the same as for other applications for variances, or does it impose added requirements?

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. In acting consistently with "affirmatively furthering fair housing," it is considered preferable to have a reasonable accommodation procedure intended to facilitate a disabled applicant's request for exceptions to zoning and land use rules, that does not require a public hearing process. As previously explained in the joint statement by DOJ and HUD:

"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 the Department of Justice and the Department of Housing and Urban Development, *Group Homes, Local Land Use, and the Fair Housing Act*, August 18, 1999, page 5.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer, and an explanation of any differences for persons with disabilities:

The City does not require disabled individuals to apply for a variance in order to obtain an exception from zoning and land use rules. Instead, the code provides reasonable accommodation procedures for disabled individuals and groups. Like variances, reasonable accommodations involve a public hearing, but the matter is heard before a hearing officer rather than the Planning Commission.

10. Does the zoning code distinguish housing for persons with disabilities from other residential uses by requiring an application for a conditional use permit (CUP)? Yes No

Background

See the Background section for questions 7 and 9 above.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and what aspects of use trigger the need for a permit:

The code does not distinguish housing for persons with disabilities who are residing as a single housekeeping unit from any other residential use in which individuals are residing as a single housekeeping unit. Licensed residential care facilities with six or fewer residents can also establish in any residential zone without a use permit or reasonable accommodation. Licensed residential care facilities with seven or more residents, and unlicensed residential care facilities, may establish in residential zones with a CUP or reasonable accommodation, but they are the only group not living as a single housekeeping unit that can do so. By providing an opportunity to establish residences with a CUP or reasonable accommodation to disabled groups only, the code gives more favorable treatment to disabled groups not living as single housekeeping units than it gives to non-disabled groups that are not living as a single housekeeping unit. Therefore, groups of disabled individuals are distinguished only to the extent they are treated preferentially.

11. Describe the development standards, if any, for the provision of disabled-accessible parking for multiple-family projects.

Disabled-accessible parking standards for new multiple-family projects are provided within the 2007 Edition of the California Building Code.

12. Does the code contain any development standards or special provisions for making housing accessible to persons with disabilities?

Yes

No

Does it specifically reference the accessibility requirements contained in the Fair Housing Amendments Act of 1988?

Yes

No

Background

Generally, under the federal Fair Housing Amendments Act of 1988, both privately owned and publicly assisted single-story, multi-family housing units built for first occupancy on or after March 13, 1991— including both 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, or 2) are ground floor units in non-elevator buildings containing four or more units. These standards, encompassing seven basic provisions, are codified at Code of Federal Regulations Title 24, Part 100.205.

Additionally, under Section 504 of the Rehabilitation Act of 1973, it is unlawful to discriminate based on disability in federally assisted programs. This section provides that no otherwise qualified individual shall, solely by reason of his or her disability, be excluded from participation (including employment), denied program benefits, or be subjected to discrimination on account of disability under any program or activity receiving federal funding assistance. Section 504 also contains accessibility provisions for dwellings developed or substantially rehabilitated with federal funds.

For the purposes of compliance with Section 504, “accessible” means ensuring that programs and activities, when viewed in their entirety, are accessible to and usable by individuals with disabilities. For housing purposes, the Section 504 regulations define an accessible dwelling unit as a unit that is located on an accessible route and can be approached, entered, and used by individuals with physical disabilities. A unit that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in Code of Federal Regulations Title 24, Part 8.32 is accessible. In addition, the Section 504 regulations impose specific accessibility requirements for new construction and alteration of housing and non-housing facilities in HUD assisted programs. Section 8.32 of the regulations states that compliance with the appropriate technical criteria in the Uniform Federal Accessibility Standards (UFAS), or a standard that is equivalent to or stricter than the UFAS, is an acceptable means of meeting the technical accessibility requirements in Sections 8.21, 8.22, 8.23 and 8.25 of the Section 504 regulations. However, meeting Section 504 accessibility requirements does not exempt housing from other accessibility requirements that may be required under fair housing laws.

The following Section 504 requirements apply to all federally assisted newly constructed housing and to *substantial rehabilitation* of housing with 15 or more units:

- A minimum of five percent of total dwelling units (but not less than one unit) accessible for individuals with mobility impairments;
- An additional two percent of dwelling units (but not less than one) accessible for persons with hearing or vision impairments; and
- All units made adaptable that are on the ground level or can be reached by an elevator.

Fair housing laws do not impose a duty on local jurisdictions to include accessibility provisions in their codes, or to enforce the accessibility provisions of fair housing laws. However, the inclusions of accessibility standards and/or plan checking for accessibility compliance are significant ways that jurisdictions can affirmatively further fair housing choice for persons with disabilities.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and of the standards, if any:

The provision for making housing accessible to persons with disabilities is found within the 2007 Edition of the California Building Code. Fair Housing is referenced within the Building Code Sections but the Fair Housing Amendments Act of 1988 is not specifically cited.

13. Does the jurisdiction conduct plan checking for accessibility compliance of covered multi-family new construction?

Yes No

Background

See the final paragraph of the Background section of question 12.

If 'Yes', please give a brief description of process and what items are checked.

During plan check the Building Department enforces requirements from the 2007 Edition of the California Building Code regarding accessibility of covered multi-family new construction.

14. Is there a zoning ordinance or other development policy that encourages or requires the inclusion of housing units affordable to low and/or moderate income households (so-called 'inclusionary housing')?

Yes No

Background

An analysis of impediments to fair housing choice must be careful to not substitute or conflate housing affordability policy with policies intended to affirmatively further fair housing. While household income is not a characteristic addressed by fair housing laws, it is appropriate to recognize that a lack of affordable housing can have a disparate impact on housing choice, on the basis of characteristics protected by fair housing laws.

As demonstrated in the outcome in the recent court case of U.S. ex rel. Anti-Discrimination Center v. Westchester County, which involved failures to affirmatively further fair housing by Westchester County, New York, in appropriate circumstances the provision

and situation of affordable housing can be a tool to address a lack of fair housing choice in highly segregated communities.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

Currently Housing Element Program 2.21 requires a proportion of affordable housing in new residential developments or levies an in-lieu fee. A draft Inclusionary Housing Ordinance has been prepared and is currently available for public review on the City's website. The Ordinance creates a new chapter that will be included in Title 19 (Subdivision Code) of the Municipal Code and provides the basis for the in-lieu fees and procedures for the implementation of Housing Program 2.2.1. The Ordinance is anticipated to be adopted mid-year 2010.

15. Does the zoning ordinance allow for mixed uses?

Yes No

If 'Yes', does the ordinance or other planning policy document consider the ability of mixed-use development to enhance housing affordability? Also, do development standards for mixed-uses take into consideration the challenges of providing housing accessible to persons with disabilities in such mixed uses?

Background

The purpose of this inquiry relates to housing affordability and fair housing choice as discussed in the Background section of question 14. Also, 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 CFR Title 24, Part 100.205 and CCR Title 24 accessibility requirements.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and a brief overview of the development standards:

Yes, the zoning ordinance allows for mixed uses. The ordinance considers the ability of mixed-use development to enhance housing affordability and the Building Code includes standards for mixed-uses to take into consideration the challenges of providing housing accessible to persons with disabilities in such mixed-uses.

16. Does the zoning ordinance provide for any of the following: 1) development incentives for the provision of affordable housing beyond those provided by state law; 2) development by right of affordable housing; or, 3) a zoning overlay to allow for affordable housing development?

Yes No

Background

The purpose of this inquiry relates to housing affordability and fair housing choice as discussed in the Background section of the question 14.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and a brief overview of the development standards:

The zoning ordinance does not provide any incentives for the provision of affordable housing beyond those provided by state law but the Housing Element does. The zoning ordinance does allow the development of affordable housing by right with no special permits required when it is provided voluntarily and there are no deviations from the development standards found within the Zoning Code requested.

17. Does the zoning ordinance describe any areas in this jurisdiction as exclusive? Yes No

Are there exclusions or discussions in the ordinance or any planning policy document of limiting housing on the basis of any of the following characteristics covered by fair housing laws?

Yes No

If 'Yes', check all of the following that apply:

Race Color Sex Religion Age Disability
Familial Status National Origin

Explanation of Answer Given Above

Please provide a brief explanation of the how you arrived at the answer:

18. Are there any standards for Senior Housing in the zoning ordinance?

Yes No

If 'Yes', do the standards comply with state or federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older, or occupied by at least one person 55 years of age, or other qualified permanent resident pursuant to Civil Code §51.3)?

Yes No

Is the location of Senior Housing treated differently than that other rental or for-sale housing? Yes No

If 'Yes', explain.

Background

Under federal law housing discrimination against families with children is permitted only in housing in which all the residents are 62 years of age or older or where at least 80% of the occupied units have one person who is 55 years of age or older. Generally, California law states that a housing provider using the lower age limitation of 55 years must have at least 35 units to use the familial status discrimination exemption. Also, California law, with narrow exceptions, requires all residents to be "senior citizens" or "qualified permanent residents", pursuant to Civil Code §51.3.

The 1988 amendments to the federal Fair Housing Act exempt "housing for older persons" from the prohibitions against familial discrimination. This means that housing

communities and facilities that meet the criteria for the federal Housing for Older Persons Act (HOPA) may legally exclude families with children. Such housing is still bound by all other aspects of fair housing law (such as prohibition of discrimination based on race, national origin or disability).

Section 3607(b)(2) defines "housing for older persons" as housing:

- (A) provided under any State or Federal program that the Secretary determines is specifically designed and operated to assist elderly persons (as defined in the State or Federal program); or
- (B) intended for, and solely occupied by, persons 62 years of age or older; or
- (C) intended and operated for occupancy by persons 55 years of age or older and –
 - (i) at least 80 percent of the occupied units are occupied by at least one person who is 55 years of age or older;
 - (ii) the housing facility or community publishes and adheres to policies and procedures that demonstrate the intent required under this subparagraph; and
 - (iii) the housing facility or community complies with rules issued by the Secretary for verification of occupancy, which shall –
 - (I) provide for verification by reliable surveys and affidavits, and
 - (II) include examples of the types of policies and procedures relevant to a determination of compliance with the requirement of clause (ii). Such surveys and affidavits shall be admissible in administrative and judicial proceedings for the purposes of such verification.

Subsection (C) was changed by the Housing for Older Persons Act of 1995 (HOPA) to remove some of the uncertainties created by a provision in the 1988 Amendments that required the "existence of significant facilities and services specifically designed to meet the physical and social needs of older persons." The HOPA also provides for a good faith defense in an action for monetary damages under this subsection.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and a brief overview of the development standards, if any:

Zoning Code Ch. 20.85 allows for the creation of granny units pursuant to California Government Code Section 65852.1 in zoning districts where there is only one dwelling unit permitted. Other than Ch. 20.85, there are no other standards for senior housing within the zoning ordinance and it is not treated differently than other rental or for-sale housing.

19. Does the zoning code distinguish senior citizen housing from other residential uses by the application of a conditional use permit (CUP)?

Yes No

Background

Senior housing is an important component of the community's housing stock. Demographic projections show that many communities will experience a growth in the elderly population. As a population ages, seniors need a variety of housing opportunities. Also, there is a higher prevalence of persons with disabilities within the senior population.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and what aspects of use trigger the need for a permit:

The Zoning Code distinguishes between convalescent housing and residential uses but not between senior citizen housing and residential uses.

20. Does the zoning code or other planning policy document address housing for “special needs” populations?

Yes No

Background

Special needs populations typically are considered to be homeless people, victims of domestic violence, people with disabilities (including those recovering from substance abuse), youth in crisis, people living with HIV/AIDS and the frail elderly. Of these groups, homeless people, victims of domestic violence, people with disabilities, and people living with HIV/AIDS have direct fair housing implications. There is a high incidence of disability in the homeless population, domestic violence overwhelming impacts women; and people living with HIV/AIDS are considered disabled under fair housing laws. While age is not a characteristic protected under federal fair housing law, it is covered under state law, and the higher incidence of disability in the frail elderly introduces possible fair housing implication for that population as well.

These populations often rely on group homes or service-enriched multi-family settings for housing opportunities. To the extent that zoning and other planning policy documents fail to provide for, or impose barriers to, these types of housing an impediment to fair housing choice might exist.

As previously noted, according to the DOJ and HUD, the term 'group home' does not have a specific legal meaning. While it often implies a living situation for people with disabilities, it also applies to any group of unrelated persons, often sharing common characteristics, who live together in a dwelling. This broader use of the term encompasses 'special needs' individuals.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and a brief explanation of 'special needs' provisions, if any:

Housing Element Goal H5 and Housing Programs 5.1.1 through 5.1.6 found in the Housing Element address the housing needs of the special needs population within the City.

21. Does the zoning ordinance establish occupancy standards or maximum occupancy limits that are more restrictive than state law, which incorporates the Uniform Housing Code (UHC)?

Yes No

Background

Occupancy standards sometimes can impede housing choice for families with children or for disabled persons. For example, some jurisdiction's zoning regulations have attempted to limit occupancy to five related persons occupying a single family home, or to strictly establish an occupancy standard of no more than two persons per bedroom. Such regulations can limit housing availability for some families with children, or prevent the development of housing for disabled persons.

The federal Fair Housing Act (FHA) also 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." [Section 807(b)(1)]

HUD implements section 589 of the Quality Housing and Work Responsibility Act (QHWRA) of 1988 by adopting as its policy on occupancy standards for purposes of enforcement actions under the FHA, the standards provided in the Memorandum of General Counsel Frank Keating to Regional Counsel dated March 20, 1991. The purpose of that Memorandum was "to articulate more fully the Department's position on reasonable occupancy policies and to describe the approach that the Department takes on its review of occupancy cases." The Memorandum states the following:

"Specifically, the Department believes that an occupancy policy of two persons in a bedroom, as a general rule, is reasonable under the Fair Housing Act. [. . .] However, the reasonableness of any occupancy policy is rebuttable, and **neither the February 21 [1991] memorandum nor this memorandum implies that Department will determine compliance with the Fair Housing Act based solely on the number of people permitted in each bedroom.**" *[emphasis added]*

The memorandum goes on to reiterate statements taken from the final rule implementing the Fair Housing Amendments Act of 1988 as follows:

- "[T]here is nothing in the legislative history that indicates any intent on the part of Congress to provide for the development of a national occupancy code"
- "Thus, the Department 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 that, in connection with a complaint alleging discrimination on the basis of familial status, the Department will carefully examine any such nongovernmental restriction to determine whether it operates unreasonably to limit or exclude families with children."*

*U.S. Department of Housing and Urban Development, Memorandum to All Regional Counsel from Frank Keating on the subject of *Fair Housing Enforcement Policy: Occupancy Cases*, March 20, 1991.

Essentially, HUD has established a starting point for assessing the reasonableness of occupancy restrictions, but has stated that the specific facts of each living situation must inform the final determination of reasonableness. While the above discussion relates to matters of discrimination affecting families with children, a similar analysis applies to standards that may limit housing choice for persons with disabilities.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer and the standards, if any:

The specific facts of each living situation inform the final determination of any occupancy limits imposed when uses apply for a use permit. For uses granted a use permit in residential zones, the Zoning Code sets forth a general occupancy limit of two residents per bedroom plus one additional resident, but allows flexibility for an applicant to request and receive a different number of occupants when appropriate. NBMC Section 20.91A.050.C.2 states:

“There shall be no more than two residents per bedroom, plus one additional resident. Notwithstanding, upon request by the applicant for additional occupancy, the Hearing Officer has discretion to set occupancy limits based upon the evidence provided by the applicant that additional occupancy is appropriate at the site. In determining whether to set a different occupancy limit, the Hearing Officer shall consider the characteristics of the structure, whether there will be an impact on traffic and parking and whether the public health, safety, peace, comfort, or welfare of persons residing in the facility or adjacent to the facility will be impacted.”

22. Does the jurisdiction encourage or require affordable housing developments to give an admission preference to individuals already residing within the jurisdiction? Yes No
If ‘Yes’, is it a requirement? Yes No

Background

This practice may have fair housing implications if the population of the jurisdiction lacks diversity or does not reflect the demographic makeup of the larger region in which it is located. There may be a barrier to fair housing choice, in that the policy can have a discriminatory affect on the basis of characteristics considered by fair housing laws.

For example if a jurisdiction already lacks housing suitable to people with mobility-related disabilities, the local population may have an under representation of such individuals, when compared to the population generally. Newly developed accessible housing that could meet the needs of such individuals, but which has a local resident admission preference, would be less likely to improve the ability of people with mobility-related disabilities to live in the jurisdiction. Likewise, a jurisdiction with an under representation of minority residents is likely to perpetuate that situation if a local resident admission preference is implemented for new affordable housing development.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

23. Does the jurisdiction have any redevelopment areas?

Yes No

If 'Yes', does the jurisdiction analyze possible impacts on fair housing choice resulting from its redevelopment activities?

Yes No

Background

Redevelopment activities can result in the permanent displacement of residents. If the housing opportunities created by the redevelopment activity could result in a different demographic mix of residents, consideration needs to be given as to whether this difference represents an impediment, an enhancement or is neutral with respect to fair housing choice.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer:

Santa Ana Heights is considered a redevelopment area however the County oversees the redevelopment activities.

24. Does the zoning ordinance or other planning or policy document include a discussion of fair housing? Yes No

If 'Yes', how does the jurisdiction propose to further fair housing?

Background

Affirmatively furthering fair housing is an important responsibility of local government. In order to receive certain federal funds a jurisdiction must certify that it is taking actions to "affirmatively further fair housing" (AFFH). Although a jurisdiction may have numerous plans, policies, and standards, fair housing is rarely discussed in a zoning ordinance. Other documents of a jurisdiction may discuss the need to affirmatively further fair housing and the policies and actions that are in place to do so.

Explanation of Answer Given Above

In light of the background provided, please provide a brief explanation of the how you arrived at the answer, a description of where AFFH discussions, if any, may be found, and a brief summary of how AFFH is accomplished:

The Zoning Code provides a definition of fair housing laws. In accordance with federal and state Fair Housing laws Zoning Code Chapter 20.98 provides reasonable accommodations in the City's zoning and land use regulations, policies and practices, when needed to provide an individual with a disability an equal opportunity to use and enjoy a dwelling.

IDENTIFIED IMPEDIMENTS AND PROPOSED CORRECTIVE ACTIONS

Based on your responses to questions 1-24, please:

a) provide a concise list of the zoning and planning impediments to fair housing choice that you have identified

The City does not believe its Code contains any zoning or planning impediments to fair housing choice.

b) describe the actions that will be taken over the next five years to remove or ameliorate the identified impediments.

ACKNOWLEDGMENTS:

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**PLEASE RETURN COMPLETED SURVEY VIA E-MAIL TO
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