

# APPENDIX B. AFFIRMATIVELY FURTHERING FAIR HOUSING ANALYSIS

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

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

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

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

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

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#### Outreach

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

- A public survey was conducted by True North Research with findings published in August 2020. The results of the survey (contained in Appendix A) indicate lack of affordable housing as the primary issue identified by survey respondents.
- Four focus group meetings with four people each were held in January 2021 to augment the survey results.
- City staff mailed 2,436 letters to property owners in the IBC, the Spectrum and other areas regarding the Housing Element Update with notice of a virtual public meeting for property owners as well as instructions on how to notify the City if property owners are interested in potentially redeveloping existing non-residential properties to residential units.
- The community workshops were noticed through the City's HEU project website ([www.cityofirvine.org/HEUpdate](http://www.cityofirvine.org/HEUpdate)), social media announcements, fliers, and the City's email notification system. Among the notice recipients were housing advocacy groups (including the Kennedy Commission) and housing developers. Due to COVID-19 pandemic, the workshops were held virtually via Zoom on weekdays at various times to facilitate participation.
- City staff also reached out to several affordable housing developers that are active in Irvine and the surrounding area to obtain input on needs and opportunities. Emails were sent to numerous affordable housing developers to set up meetings on the Housing Element Update resulting in a total of six individual and group meetings with nine developers.

Finally, City staff had multiple coordination meetings with the largest landowners in the City, the Irvine Company and FivePoint (together owning nearly 60 percent of the land in the City) to discuss housing opportunities, including viable densities, redevelopment opportunities, specific sites for the Site Inventory and income levels for new housing units. As documented in Appendix A, significant outreach was conducted by the City for over a year before the Housing Element Update was drafted and released. The City made an intentional effort to reach fair housing organizations and communities with relatively concentrated poverty for feedback on the HEU. The City's efforts included:

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- Reaching non-English speaking households by providing outreach materials and meeting translation for the following seven languages (Traditional Chinese, Simplified Chinese, Korean, Vietnamese, Japanese, Spanish, Farsi, and Arabic).
- Hosting three community workshops to discuss the HEU. City staff noticed stakeholders through the City’s HEU project website, social media announcements, fliers, and the City’s email notification system. Among the notice recipients were housing advocacy organizations, such as the Kennedy Commission, working directly with communities with relatively concentrated poverty and housing developers.

Furthermore, service providers such as Families Forward, Irvine Rotary Club, Habitat for Humanity, Abrazar, Orange County Asian and Pacific Islander Community Alliance, Orange County United Way, and Be Well OC were notified of the community workshops. Lastly, members of all the City Commissions and pertinent advisory committees related to senior, families, youth, and persons with disabilities, including Irvine Senior Citizens Council; Irvine Residents with Disabilities Advisory Board; Irvine Childcare Committee; Irvine Children, Youth, and Families Advisory Committee (ICYFAC); Diversity, Equity and Inclusion Committee (DEI); and Green Ribbon Environmental Committee were invited to participate in the community workshops and encouraged to provide feedback.

During the workshops, public input received during live polling and questions and answer periods (see Appendix A) clearly indicated that a lack of affordable housing is the primary issue from the community’s perspective.

- Conducting focus group meetings on January 26 and 27, 2021 regarding the General Plan Update, including the Housing Element Update. Topics of discussion included affordable housing, housing supply, and housing types in the City. Focus groups were comprised of residents.
- Inviting housing advocacy groups to the three community workshops to discuss the HEU. Elizabeth Hansburg with People for Housing and Cesar Covarrubias, Executive Director of the Kennedy Commission, attended focused community workshop #1 with the City staff and provided feedback. The Kennedy Commission is a housing advocacy group that works directly with communities with relatively concentrated poverty and takes on tenant rights and other fair housing-related work.
- Mailing notification letters to all California Native American tribes on the Tribal Consultation List and the City’s AB 52 notification list about the 6th Cycle Housing Element Update. Staff did not receive any letters of concern.

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- Hosting six meetings with nine affordable housing developers focused on discussing challenges and opportunities when developing affordable housing and providing related services in Irvine.
- Mailing letters to all affordable housing providers identified as having affordable units expiring during the eight-year planning period (2021-2029) associated with the 6th cycle Housing Element. The letters invited such developers to a discussion about potential ways to preserve existing affordable housing. City staff met with two property owners.
- City staff considered feedback from the public received before the HEU process and different concerns brought to City Council by college students. During the COVID-19 pandemic, students attended council meetings to ask about rental assistance during the COVID-19 pandemic, when classes were not in person. These comments focused on University of California, Irvine (UCI) units outside of the City's control and shed a light on the needs of the student population and local families affected by the COVID-19 pandemic.
- It is important to note that the City provided notices of outreach and participation opportunities related to the HEU process to housing advocacy groups, affordable and market rate housing developers, property owners, service providers and other stakeholders. Input received from advocacy groups, including the Kennedy Commission, (see Appendix A for letters) identified a limited number of comments, but more importantly support for the City's program to increase the inclusionary housing requirement from 15 to 20 percent. Furthermore, Kennedy Commission spoke in support of the Housing Element Update at the Planning Commission meetings accepting the Draft Housing Element Update in July and August 2021 and December 2021.

### Assessment of Fair Housing Issues

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

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



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maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

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

As detailed in the data and analysis presented in this section of the Housing Element, a lack of affordable housing (which in turn results in a lack of housing choice) is the primary fair housing issue in Irvine. It is important to note that the Housing Plan contained in Chapter 8 of this Housing Element includes twenty-five (25) programs to encourage, facilitate and expand affordable housing in the City.

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

The 2021 TCAC/HCD Opportunity Area map uses composite index scores of three different domains (economic, environmental, and education) to categorize tracts as low, moderate or high resource. Categorization is based on percentile rankings for census tracts within the Orange County region and higher composite scores mean higher resources. Within Orange County, most of the high and highest resource areas are located along the coast, in South County, Irvine, and the County’s eastern areas. The City ranges almost entirely between moderate resource and highest resource areas, with pockets of low resource areas. The 2021 TCAC/HCD Opportunity Area Map identifies four of the City’s census tracts as low resource, nine as moderate resource, one as moderate resource (rapidly changing), 11 as high resource, and 12 as highest resource. (Note: One census tract within the City has missing/insufficient data.) The four low resource census tracts generally correspond to the Irvine Business Complex Area. Table B-1, Opportunity Area Map Scores and Categorization, shows the scores by domain for each census tract. Figure B-6, TCAC/HCD Opportunity Area Map (located at the end of this appendix), illustrates the categorization of resource areas in and around the City.

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**Table B-1. Opportunity Area Map Scores and Categorization**

CENSUS TRACT	ECONOMIC DOMAIN SCORE	ENVIRONMENTAL DOMAIN SCORE	EDUCATION DOMAIN SCORE	COMPOSITE INDEX SCORE	FINAL CATEGORY
06059062628	0.894	0.920	0.768	0.588	Highest Resource
06059052511	0.917	0.737	0.882	0.613	Highest Resource
06059052408	0.679	0.007	0.530	-0.336	Low Resource
06059062612	0.787	0.456	0.811	0.414	High Resource
06059062611	0.094	0.366	0.579	-0.120	Moderate Resource
06059052522	0.872	0.645	0.759	0.474	Highest Resource
06059052421	0.941	0.042	0.948	0.381	High Resource
06059052417	0.516	0.040	0.893	0.120	Moderate Resource
06059052418	0.861	0.012	0.880	0.129	Moderate Resource
06059052420	0.939	0.296	0.929	0.548	Highest Resource
06059052505	0.352	0.237	0.747	0.118	Moderate Resource
06059052515	0.745	0.444	0.737	0.361	High Resource
06059052513	0.690	0.733	0.901	0.510	Highest Resource
06059052506	0.766	0.352	0.820	0.379	High Resource
06059062614	0.085	0.490	0.846	0.084	Moderate Resource
06059052410	0.184	0.014	0.357	-0.649	Low Resource
06059062621	0.740	0.516	0.380	0.029	Moderate Resource (Rapidly Changing)
06059052517	0.643	0.045	0.801	0.127	Moderate Resource
06059052514	0.815	0.530	0.825	0.461	Highest Resource
06059075515	0.452	0.005	0.236	-0.839	Low Resource
06059052528	0.685	0.809	0.815	0.478	Highest Resource
06059052525	0.889	0.321	0.804	0.418	High Resource
06059052519	0.763	0.674	0.653	0.354	High Resource
06059052518	0.575	0.064	0.648	0.031	Moderate Resource
06059052520	0.744	0.797	0.763	0.467	Highest Resource
06059062610	0.757	0.031	0.411	-0.214	Moderate Resource
06059062604	0.979	0.437	0.955	0.736	Highest Resource
06059052521	0.704	0.541	0.759	0.388	High Resource
06059052426	0.674	0.210	0.873	0.322	High Resource
06059052527	0.771	0.345	0.735	0.334	High Resource
06059052526	0.627	0.518	0.747	0.343	High Resource
06059052523	0.828	0.412	0.579	0.275	High Resource
06059062627	0.003	0.629	0.887	-0.018	Moderate Resource
06059062626	0.000	0.702	0.645	-0.303	Low Resource
06059062631	0.984	0.967	0.957	0.922	Highest Resource
06059052404	#N/A	#N/A	#N/A	#N/A	Missing/ Insufficient Data
06059062630	0.858	0.683	0.903	0.564	Highest Resource
06059062629	0.903	0.955	0.957	0.744	Highest Resource

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

- Poverty.

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

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

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

## Patterns of Integration and Segregation

### Concentrations of Minority Population

The 2021 TCAC/HCD Opportunity Areas map combines both poverty and patterns of minority concentrations. Those census tracts that have both a poverty rate of over 30 percent and are designated as racially segregated are filtered into the “High Segregation & Poverty” category. The term “concentration” is defined as a census tract block group with a proportion of a particular race/ethnic group greater than that of the countywide average for that group. There are no census tract block groups designated by TCAC/HCD maps as “High Segregation & Poverty.”

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However, Irvine is a racially and ethnically diverse community. Figures B-7 through B-10 (located at the end of this appendix) illustrate the concentrations of minorities in general, as well as African American, Hispanic, and Asian populations. As shown, a total of 50 census block groups in the City exceed the County minority concentration average of approximately 38.0 percent, mostly located near John Wayne Airport, the University of California, Irvine, southeast of the 405 Freeway, and the Orange County Great Park. The 2020 Orange County Analysis of Impediments to Fair Housing Choice (2020 Orange County AI) states that the high student population in and surrounding the University of California, Irvine is a contributing factor for the concentration of minorities and a reflection of the diversity of the student population. In September 2020, the Wall Street Journal ranked the university as number 2 in the nation for diversity.

In block groups throughout most of the City northeast of Jeffrey Road and near the Irvine Spectrum Center, 32 of the 121 census block groups in the City exceed the County Asian concentration average of approximately 20.0 percent. There are 68 census block groups that exceed the County Hispanic concentration average of 34.0 percent, where most of these block groups are near the Irvine Business Complex and near Irvine Station along the Interstate 5 and Toll Road 133. A total of 54 of the 121 census block groups in the City exceed the County African American concentration average of 2.0 percent, the majority of these are spread throughout the City and near the Irvine Spectrum Center.

### Areas with Limited English Proficiency

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

The U.S. Census Bureau defines a “linguistically isolated household” as a household in which all members age 14 years and older speak a non-English language and also speak English less than “very well.” The ACS provides information on households with populations five years and over who speak English “less than very well.” In Irvine, the percentage of linguistically isolated population is an estimated 17.1 percent of the population. The rate for the County (according to the Orange County AI) is 12.1 percent. The most spoken language for those in Irvine with Limited English Proficiency (LEP) is Chinese – distinct from the most common language spoken by those with LEP in the County (Spanish).

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

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those programs and activities. This requirement also applies to Federal fund grantees and sub recipients. Therefore, the City is required to comply with this regulation and fulfills this requirement by providing a translation tool on the City's website that translates content into over 70 languages. The City also offers in-house translation for any citizen that would like information or has questions regarding housing or affordable housing. The City maintains a current list of people who speak several of the dominant languages in Irvine per demographic data.

The Housing Plan (Chapter 8) includes the following programs to address language isolation and barriers:

- **PP-J.3: Legal Assistance for Renters and PP-K.1: Homeownership Education** to provide the following housing information and assistance in a variety of languages and to community organizations that work with different populations:
  - Irvine Affordable Housing Guide at City Hall and online.
  - Link on its website to landlord/tenant mediation services and landlord/tenant rights and responsibilities, which may include information from service providers such as the Fair Housing Foundation.
  - Add information on the City's website and provide resources on non-profits such as Community Legal Aid SoCal and the Legal Aid Society of OC.
  - Encourage homeownership through education, sharing information, and links to existing nonprofit, County, State, and Federal resources on the City's website.
- **Program PP-M.4: Language Access** that calls for an evaluation of programs, services, and materials to assess if there is any lack of translation or interpretation services and provide it as appropriate. Additionally, the City will continue to make information available in various languages (Traditional Chinese, Simplified Chinese, Korean, Vietnamese, Japanese, Spanish, Farsi, and Arabic) to ensure residents with Limited English Proficiency have accessible information.
- **PP-M.2: Cooperation with Community Based Organizations** that involves creating a list of local organizations and reach out to them to ask to discuss possible collaborations.

### Language Access in the County

The 2020 Orange County AI identified that the lack of meaningful language access for individuals with limited English proficiency (LEP) may be a significant contributing factor to fair housing issues in Orange County. The 2020 Orange County AI notes, "private landlords generally are not required to provide leases or other key documents or communications in the primary languages of individuals with LEP. This can create confusion about individuals' rights. Housing authorities [in Orange County] frequently have staff who are fluent in Spanish and/or

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Vietnamese, but LEP speakers of other languages may have limited options, with housing authorities relying on paid translation or interpretation services to communicate.”

### Concentration of Poverty

Figure B-11, Poverty Concentration Map (located at the end of this appendix), identifies concentrations of poverty in Irvine by census block group per the 2014–2018 ACS 5-Year Estimates. A concentrated area of poverty is defined by the U.S. Department of Housing and Urban Development (HUD) as a census tract where the percentage of individuals living in households with incomes below the poverty rate is more than the lesser of 40 percent or three times the average poverty rate for the metropolitan area. The City is in the Los Angeles-Long Beach-Anaheim metropolitan area, where the average poverty rate (according to 2014–2018 ACS 5-Year Estimates) is approximately 15.0 percent.

As shown on Figure B-11 (located at the end of this appendix), concentrations of poverty are most prominent around the University of California, Irvine where as much as 68.7 percent of the population have household incomes below the poverty level. However, it is important to note that only one of the minority concentration areas identified on Figure B-7, the area near the University of California, Irvine, is also an area with a concentration of poverty which can likely be attributed to the large number of full-time undergraduate and graduate students with lower incomes who reside in the area. The poverty rate is highest in Census Tract 626.26, Block Group 2, where 84.4 percent of the households have an income below the poverty level. Eight of the City’s 121 block groups (7.0 percent) have a concentration of poverty, compared to 34 of the County’s 1,823 census block groups (2.0 percent).

The Senate Bill 2 Compliance Sites Inventory (Appendix C) identifies 3.0 percent of all units (at all income levels) and 8.0 percent of lower-income units on sites in areas with a concentration of poverty. These rates are quite low due to the City’s overall high levels of income.

The data presented in this Affirmatively Furthering Fair Housing section of the Housing Element indicates that the primary fair housing issue in Irvine is a lack of housing choice caused by a lack of affordable housing despite the thousands of affordable housing units developed over the last 20 years. To address this ongoing issue, the Housing Plan contains twenty-five (25) programs specifically targeted to encourage and facilitate the development of affordable housing units in the City. This effort will increase the number of affordable housing units thereby alleviating the lack of housing choice. These programs include the following:

- **PP-E.3: Inclusionary Housing Ordinance Update.** The City will retain a consultant to conduct a feasibility study on increasing the inclusionary housing requirement from 15 percent (5 percent very low, 5 percent low, and 5 percent moderate) to 20 percent (9 percent very low, 6 percent low, and 5 percent moderate). The policy changes proposed to Planning Council and City Council, if deemed feasible in the study, will include increasing the inclusionary requirement to



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20 percent with corresponding updated in-lieu fee (paid if affordable units are not provided on-site) to reflect current land and construction costs, and other related updates.

- **PP-F.2: Irvine Community Land Trust.** The Trust was established in 2006 and is among a small number of land trusts in California. The Trust retains ownership of land for the development of affordable housing units primarily focused on extremely low, very low- and low-income households. The Trust has successfully facilitated the development of hundreds of deeply affordable units in the City to date. The City seeks to continue to strengthen its relationship with the ICLT to collaborate and partner on efficiently and effectively maximizing affordable housing opportunities. To this end, the City will pursue the following:
  - Coordinate with the ICLT to actively pursue land acquisition opportunities for a range of affordable housing options, including rental apartments, ownership housing, transitional housing, supportive housing, and single-room occupancy housing.
  - Collaborate to determine feasibility of developing permanently affordable housing in partnership with the ICLT on publicly owned sites that may be designated as surplus property.
  - Assist the ICLT and developers to access public funding and financing and through new construction to increase supply of permanently affordable rental units with supportive services that target seniors and persons with disabilities and extremely low-income households.
  - Partner with the ICLT to seek legislative support for:
    - Public funding resources and prioritization of those sources to advance the development of permanently affordable rental and ownership housing at all affordable income levels.
    - Legislative changes that remove sunset provisions for affordable housing developments.
- **PP-B.5: Dedicate Staff for Affordable Housing Entitlement, Permit, and Fee Processes.** To decrease the entitlement and construction process, following the adoption of the Housing Element the City will designate a dedicated planner, plan checker, and building inspector(s) to provide expedited processing for affordable housing projects, with an emphasis on projects that include extremely low-income units. The goal of this program is to expedite the affordable housing development process to accelerate the availability of affordable housing units in the community, which also has the effect of reducing development costs.
- **PP-B.6: Funding, Incentives, and Concessions for Extremely Low-Income Developments.** The City will undertake the following actions during the planning period:
  - Hold one (1) outreach meeting or survey with affordable housing developers and providers each year after the state budget funding for the next fiscal year are made

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public (by October of each year) to discuss available funding sources (City, state and federal), sites identified in the Housing Element sites inventory that are available, developer needs and opportunities for affordable housing projects. Outreach will include experienced developers with recent affordable housing project experience that includes units affordable to extremely low-income households and households with special needs. Schedule of action: by October 31 of each calendar year during the 6th Cycle planning period.

- Emphasize funding for housing developments affordable to extremely low-income households and identify feasible financial incentives and regulatory concessions to encourage the development of different housing types (including multi-family and single-room occupancy projects) through the following actions:
- Provide technical assistance to developers regarding City's lower income sites, funding opportunities, as well as mixed use zoning and density bonus incentives (make the availability for technical assistance known to developers at the outreach meeting referenced above). Schedule of Action: by October 31 of year calendar year (outreach meeting) and as needed/requested by developers).
- Conduct a feasibility studies on the City's ability to provide the following:
- Fee underwriting, fee deferrals, and/or permit fast-tracking for projects that include housing affordable to lower income households, prioritizing projects that include units affordable to extremely low-income households. Schedule of Action: by October 2023.
- Relaxed development standards to potentially enhance financial feasibility (potentially as part of the Land Use Element Update and Zoning Ordinance Amendment) for mixed use development projects that include an affordable housing component with an emphasis on extremely and very low-income units. Schedule of Action: by October 2023.
- Incentives and concessions given current available funding sources (e.g., inclusionary housing fees and state and federal grants/assistance). Schedule of Action: by October 2023.
- City staff will sign up for and receive regular alerts and communications about state and federal funding opportunities (from HCD, HUD and other entities) for affordable housing development, including extremely low-income housing units. Schedule of Action: by June 30, 2022.
- City staff will apply for or support a minimum of three (3) grant applications for affordable housing (including extremely low-income housing units) each year. To

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date, grant opportunities for cities have been limited to SB 2, LEAP and Permanent Local Housing Allocation (PLHA). The remainder of available grants require developers to apply for specific projects (meeting stringent criteria) rather than local jurisdictions. City staff will meet with the County Housing & Community Development Services Department each year to identify additional funding opportunities for affordable housing activities. Schedule of Action: each year by December 31.

The goal of this program is to offer all available concessions, technical assistance and funding assistance to housing projects that include lower income housing units to improve the financial feasibility of those projects, allowing the projects to be implemented rather than abandoned due to financial infeasibility.

As shown in Table 8-1 (Quantified Objectives), the City conservatively estimates that 32 extremely low and 1,396 very low-income units will be developed during the planning period.

*Disclaimer – completing the tasks and activities referenced in this program will be dependent upon available local, state, and federal funding sources.*

- **PP-B.7: Senate Bill (SB) 35 Streamlined and Ministerial Approval Process.** The City will establish streamlined, ministerial review procedures and processes for qualifying multi-family residential projects consistent with SB 35 within one year of Housing Element certification.
- **PP-E.5: Utilize Available Funding Tools and/or Public/Private Partnerships to Create Lower Income and Workforce Housing.** The City will identify and utilize State programs and/or potential public/private partnerships with major employers to acquire existing market rate housing units or develop new housing units to create moderate or workforce housing (available to households with incomes at 80 percent to 120 percent of AMI).

In February 2022, the City Council approved the broad terms and conditions under which the City will participate in the Middle-Income Housing Program. Subsequently, the City executed Public Benefit and Joint Power agreements to convert existing market rate apartment units to affordable units at The Royce Apartments. More specifically, the first agreement approved is with the California Statewide Communities Development Authority (CSCDA) and the Waterford Property Group to issue approximately tax-exempt bonds to finance the acquisition, maintenance and operations of The Royce Apartments, a 520-unit apartment development. Under the agreement, one-third of the units will be designated for persons earning no more than 80% of AMI (low income), one-third for those earning up to 100% of AMI (moderate income), and one-third for those earning a maximum of 120% of AMI (moderate income). Rent restrictions would expire upon full repayment of the bonds, which are projected to be paid off in 35 years.

Other Potential programs could include concessions or incentives to large existing or future Irvine employers, and/or collaborations between employers and developers to make affordable

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housing projects and/or conversions feasible. Schedule of Action: Agreements for The Royce was executed in March 2022 with other programs pursued annually.

- **PP-F.3: Collaborate with Public Agencies to Leverage Other Publicly Owned Land for the Development of Affordable Housing Projects through Master Planning and Disposition Efforts.** There are several sizable vacant parcels owned by the County of Orange, the Irvine Ranch Water District and the State of California within the City limits. The City will coordinate with public agencies to facilitate the development of affordable housing projects on vacant and underutilized sites, including sites owned by the County of Orange, the State, and the Irvine Ranch Water District. Activities could include collaboration with public agencies on master-planning and disposition efforts for large vacant and underutilized sites. For instance, the County of Orange currently owns significant property near the Irvine Station. Under this program, the City would work with the County to develop affordable housing strategies for these properties.
- **PP-G.1: Continue to Apply “Additive” Intensity (under the Land Use Element) for Affordable Housing.** The City’s Land Use Element allows for the entitlement of affordable housing units beyond the maximum unit counts established in the Zoning Ordinance, thus considered additive to the General Plan intensity thresholds, which allows additional units to be developed under the City’s established land use designations. The City will continue implementing this policy. Approximately 1,300 affordable units in the City have been determined to be additive over the past eight years. Schedule of action: as development projects are proposed (timing dependent on development community).
- **PP-B.1: Assist with Development of Lower-Income Housing.** To assist the development of housing for households with lower incomes on larger sites, the City will seek to amend the fee collection process for land divisions and lot line adjustments resulting in parcel sizes that facilitate multifamily developments affordable to households with lower incomes (including extremely low income and farmworkers) considering State, Federal, and local financing programs (i.e., 2–10 acres). The City will also identify potential property owners and nonprofit developers by the end of FY 2022-23 and work with them on an annual basis to target and market the availability of sites with the best potential for development. In addition, the City will offer the following incentives for the development of affordable housing, including but not limited to the following:
  - Streamlining and expediting the approval process for land division for projects that include affordable housing units.
  - *Within 12 months of Housing Element certification*, the City will prepare an analysis, including a financial assessment, with the goal of eliminating or reducing permitting fees for housing projects that are 100 percent affordable. *The goal of reducing fees would be to reduce factors that can render an affordable housing development financially infeasible, thereby constraining the development of affordable housing.*

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- The City will prepare an analysis, including a financial assessment, with the goal of eliminating or reducing permitting fees for housing projects that are 100 percent affordable.
- City staff will provide technical assistance to developers on funding applications, as projects are proposed (specific timing dependent on development community).
- The City will modify development requirements, where possible, for projects, as projects are proposed (specific timing dependent on development community).
- **PP-B.2: Expedite Development.** The City will expedite development of housing projects for seniors, people with disabilities, and lower-income people and/or households.
- **PP-D.1: Affordable Housing Preservation/Committed Assistance Program (including Financial Resources and In-Kind Services).** The City will provide financial and other available assistance to affordable housing property owners to preserve units. The committed assistance may consist of both financial and non-financial, in-kind services to incentivize the preservation of affordable units. The total number of units to be preserved are seven extremely low, 517 very low and 299 low-income units (Chapter 4, At-Risk Affordable Housing, of this Housing Element identifies the project name, level of affordability and address of all units).

It is important to note that in California Government Code, Section 65583.1(c)(4), “committed assistance” means “that the city or county enters into a legally enforceable agreement during the period from the beginning of the projection period until the end of the third year of the planning period that obligates sufficient **available funds or other in-kind services** to provide the assistance necessary to make the identified units affordable and that requires that the units be made available for occupancy within two years of the execution of the agreement.” The City will pursue committed assistance through a legally enforceable agreement by the end of the third year of the housing-element planning period, or by June 30, 2024. The committed assistance will include both financial and in-kind assistance as allowed by State law. The estimated dollar amount of committed assistance is \$7,000,000. The estimated in-kind committed assistance will be development concessions that would be financial incentives to property owners with affordable units at risk of converting to market rate units during the 6<sup>th</sup> Cycle planning period. This assistance adheres to the requirements of State law and the Adequate Sites Program Alternative Checklist (Figure 8.1) from HCD.

The total committed assistance (financial and in-kind) will be sufficient to make the targeted units available for occupancy within two years of the execution date of the agreement. Additionally, this program will involve reporting on the status in the City’s Annual Progress Report on the Housing Element beginning in 2025. The California Government Code requires that If the City does not enter into an enforceable agreement of committed assistance for all the units initially identified by the end of the third year of the planning period, or June 30,

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2024, the City must adopt an amendment to the 6<sup>th</sup> Cycle Housing Element, no later than the end of the fourth year of the planning period (June 30, 2025) identifying additional adequate sites sufficient to accommodate the number of units for which committed assistance was not provided.

The City will comply with the requirements of California Government Code, Section 65583.1(c)(2)(C), in connection with the execution of agreements, as presented below:

- The City will hold a public hearing in October 2022 and make the required finding that the units are eligible and are reasonably expected to change from housing affordable to low- and very low-income households to any other use during the next eight years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use.
- The units will have long-term affordability covenants and restrictions that require the units to be affordable to, and reserved for occupancy by, persons of the same or lower income group as the current occupants for a period of at least 55 years.
- The units will be within "assisted housing developments," as defined in paragraph (3) of subdivision (a) of Section 65863.10. (iii) and the City Council finds, after a public hearing, that the units are eligible, and is reasonably expected to change from housing affordable to low- and very low-income households to any other use during the next eight years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use.
- The units are in decent, safe and sanitary condition at the time of occupancy.
- At the time the units are identified for preservation, they are available at affordable cost to persons or families of low- or very low income.
- **PP-D.2: Continue the Preservation and Monitoring of Existing and Future Affordable Units.** The City will continue to monitor and preserve the affordability of all publicly assisted housing units on an ongoing basis (timing is dependent on property owners and development community) and:
  - Outreach to developers with expiring deeds to consider options to extend affordability on an ongoing basis, as appropriate;
  - Support applications by nonprofits for funding to purchase at-risk units;
  - Find local nonprofits and reach out by mid-2022 to strengthen relationships and develop a plan or strategy for quickly moving forward in the case units are noticed to convert to market-rate uses in the planning period;
  - Consider pursuing funding on at least an annual basis;



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- Contact nonprofits to develop a preservation strategy by January 2023 and be ready to quickly act when notice of conversion is received;
  - Monitor the units to ensure tenants receive proper notifications, education, and support.
- **PP-E.1: Advertise Available Resources.** In addition to providing funding opportunities related to HUD programs on the City’s website, funding opportunities will be disseminated via targeted email notifications and may also be posted on all City social media accounts and include information on vacant land currently owned by the City (i.e., location, size, and zoning). Schedule of action: funding opportunities on an ongoing basis (dependent on HUD availability) and information on vacant land owned by the City following all required actions related to the Surplus Property Act.
- **PP-E.2: Monitor Grant Opportunities and Maximize Grant Applications.** The City will access information from HCD and other State agencies to identify grant application opportunities for affordable housing. When grant opportunities are known, the City will reach out to affordable developer stakeholders to identify projects and/or opportunities to include on grant applications. **The City will apply or support a minimum of three (3) grant application each year. The goal of this program would be to increase the amount of funding available for affordable housing projects, which require public subsidies to be built. Disclaimer: completing the tasks and activities referenced in this program will be dependent upon available local, state and federal funding sources.**
- **PP-E.4: Identify and Analyze Local Funding Options.** The City will identify and analyze local funding options for affordable housing and monitor new funding and financing resources each year. This program will also include using State and Federal funding received by the City to partner with nonprofit organizations (such as the ICLT), as the commitment of City funding can enhance the scoring of 100% affordable projects to secure important funding sources, such as low-income housing tax credits (LIHTCs) that have become highly competitive.
- **PP-F.1: Leverage City-Owned Land for the Development of 100% Affordable Housing Projects.** The City will follow all requirements of the Surplus Land Act, Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5, including holding a public hearing designating the properties as “surplus properties” under California Law. The City will also conduct an analysis to determine, based on market conditions, if selling or leasing the properties would maximize the development of affordable units. The City will then send a Notice of Availability to all required parties regarding the availability of **County** owned land available for purchase or lease. It is the City’s intent to facilitate the development of 100% affordable housing projects on vacant or underutilized City-owned sites. The City will also coordinate with the County and other

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public entities that own a site (or sites) to ensure that the legally mandated surplus property process is followed.

- **PP-G.2: Adopt Ordinances and Policies that Encourage a Diverse Housing Stock.**

The City will amend the Inclusionary Housing Ordinance *by October 2024*; encourage and incentivize ADUs through various programs *by January 2023*; encourage innovative design prototypes and/or construction, such as smaller units with increased energy efficiency (i.e., sustainable designs and operations), modular units or other innovative building types *on an ongoing basis*; and streamline permitting to encourage a diverse housing stock *on an ongoing basis*. See other objectives for proposed activities regarding such topics. **The goal of this program is expanded affordable housing units in the City by requiring those units or allowing for varying building designs that reduce development/resident costs.**

- **PP-G.3: Zoning Changes.** The City will make appropriate zoning changes as part of the General Plan - Land Use Element Update and Zoning Ordinance Amendment to bring the City's Zoning Ordinance in compliance with State law changes related to parking, by right uses, and other requirements. The zone changes will also include those detailed in Programs PP-I.1 (allowing more types of residential uses) and PP-A.3 (establishing residential overlays in non-residential areas at densities suitable for lower income projects). These changes will also allow and encourage the development of new affordable housing in resource-rich areas and provide more affordable housing options for Irvine residents. Affordable housing depends primarily on Low Income Housing Tax Credits for a large portion of project finance. These Tax Credits are competitive with the projects with higher scores securing funding and a portion of project scoring relies on whether the project location is in a low, medium or high resource area. By zoning existing commercial and other properties to allow for higher density residential uses in medium to high resource areas, it facilitates affordable housing by contributing to an increased likelihood of award of substantial funding which in turn makes projects more financially feasible and therefore implementable. Furthermore, this update will allow these land uses in the City's residential zones, will modify portions of the Municipal Code dealing with the location of and distance between these housing types and potentially other requirements, and will ensure that the City uses only objective development standards to maintain compliance with current State requirements.
- **PP-G.4: Partner with University of California, Irvine (UCI) to Identify and Track University Housing.** The City will work UCI to draft agreement regarding approving, permitting, certifying occupancy, and/or reporting new units to the California State Department of Finance (DOF). The agreement will involve documentation from UCI on planned housing has been approved to be built as well as information on the timing of the project construction and unit affordability by household income category.

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- **PP-G.5: Housing Choice Vouchers.** The Federal Housing Choice Voucher Program extends rental subsidies to extremely low and very low-income households, including families, seniors, farmworkers, and the disabled. The program offers a voucher that pays the difference between the current fair market rent as established by HUD and what a tenant can afford to pay (i.e., 30% to 40% of household income). The voucher allows a tenant to choose housing that costs above the payment standard, providing the tenant pays the extra cost. In Irvine, the program is administered by the OCHA. Given the continued need for rental assistance, the City supports and encourages the provision of additional subsidies through the Housing Choice Voucher Program. The City will continue to provide information to households and homeowners interested in participating in this program.
- **PP-G.6: Irvine Housing Authority.** The City will study the benefits associated with creating an Irvine Housing Authority with the ability to allocate Federal Housing Choice Vouchers.
- **PP-G.7: Terms of Affordability.** The City will analyze incentives to encourage affordable housing developers to consider extending the terms of affordability in perpetuity.
- **PP-I.3: Leverage All Funding Options.** The City will explore the feasibility of joining the Orange County Housing Finance Trust (OCHFT), a joint power authority composed of many Orange County cities. The OCHFT can provide additional funding options for affordable housing developers. The City will ensure that housing options will include reasonable accommodations and supportive services for people with disabilities.
- **PP-M.3: Density Bonus Eligibility.** The City will connect developers of projects with affordable density bonus units and local non-profits/community organizations to coordinate efforts and determine if the units could be set aside, where feasible, for special groups including but not limited to Veterans and special need adults.

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

To identify R/ECAPs, HUD has identified census tracts with the majority of non-White population (greater than 50 percent) and a poverty rate that exceeds 40 percent or is three times the average census tract poverty rate for the metro/micro area, whichever threshold is lower. In Irvine, there were three (3) racially and ethnically concentrated area of poverty (R/ECAP) areas, all three areas are surrounding the University of California, Irvine as shown on Figure B-12, Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) Map (located at the end of this appendix). To address these areas, the Housing Plan contains twenty-five (25) programs to encourage and facilitate the development of more affordable housing units to provide additional housing choices for the lowest income households in the City.

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**There are concentrations of minority populations throughout the City. High concentrations of minority population can be found South of Sand Canyon Ave, in the Woodbridge neighborhood, and in the areas surrounding the University of California, Irvine.**  
**Diversity Index**

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

The relative diversity of different areas of the City is illustrated through the 2019 Diversity Index (Table B-2, Diversity Index by Zip Code, and Figure B-13, Diversity Index Map (located at the end of this appendix)). The City's 10 zip codes each have a diversity index of 67.5 or higher, indicating that the City has high levels of diversity.

**Table B-2. Diversity Index by Zip Code**

ZIP CODE	DIVERSITY INDEX
92602	100.0
92603	100.0
92604	68.3
92606	67.5
92610	69.6
92612	68.5
92614	69.1
92617	69.9
92618	79.0
92620	87.0

### **Racially Concentrated Areas of Affluence (RCAs)**

While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to "Racially Concentrated Areas of Affluence: A Preliminary Investigation" authored by Edward G. Goetz, Anthony Damiano, and Rashad A. Williams of the Center for Urban and Regional Affairs, University of Minnesota (a policy paper published by HUD), RCA is defined as an affluent, White community. The policy paper goes on to state that "Whites are

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the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.”

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

According to the 2014–2018 ACS 5-Year Estimates, White households in the City have a median income of approximately \$1,196, or 1.0 percent, more than all households. In the County, White households have a median income of approximately \$4,106, or 5.0 percent, more than all households. As shown on Figure B-14, Racially Concentrated Areas of Affluence (located at the end of this appendix), census tracts with a White population over 40 percent and household income in the top median-income quartile of all City census tracts (greater than \$135,500), are mostly located in the eastern portion of the Irvine Industrial Complex as well as the Turtle Rock, University Park, and Woodbridge neighborhoods. Table B-3, White Household Income and Population Percentage, presents data from the 2014–2018 ACS 5-Year Estimates. As indicated in Table B-3, White residents make up approximately 64.0 percent of City residents, compared to approximately 62.0 percent of County residents, according to the 2014–2018 ACS 5-Year Estimates.

**Table B-3. White Household Income and Population Percentage**

MEDIAN HOUSEHOLD INCOME	CITY OF IRVINE	COUNTY OF ORANGE
All Households	\$100,969	\$85,398
White Alone	\$102,165	\$89,504
White Population	64.0 percent	62.0 percent

## Familial Status

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

## Adults Living Alone or With Spouse

The percentage of adults living with their spouse in the City is 5 percent lower than that of the County. More specifically, according to the 2014–2018 ACS 5-Year Estimates, the percentage of adults living with their spouse is approximately 47.0 percent, compared to approximately 52.0 percent of adults in the County. Local block groups with the highest shares of adults living with their spouse are located mainly in the City’s north of the five Freeway and the 133 Toll Road, south of the 405 Freeway, and in the Orange County Great Park area, as seen on Figure B-15,

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Percent of Adults Living with Spouse Map (located at the end of this appendix). Approximately 9.0 percent of married-couple households in the City and approximately 9.0 percent of married-couple households in the County live below the poverty line.

Additionally, 11.0 percent of Irvine City heads of a household and 9.0 percent of County heads of households live alone. As shown on Figure B-16, Percent of Adults Living Alone Map (located at the end of this appendix), and the largest share of adults living alone are near John Wayne Airport and the Irvine Spectrum Center. Census Tract 626.04, Block Group 5, has the highest share of adults living alone with 70.8 percent of heads of households living alone.

### Children in Married-Couple Households

The 2015 Irvine Analysis of Impediments to Fair Housing Choice (2015 Irvine AI) states families with children often have special housing needs due to lower per capita income, the need for affordable childcare, the need for affordable housing, or the need for larger units with three or more bedrooms. Families with children and especially teenagers may face discrimination in the rental housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex or unit, confine children to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether.

In Irvine, a higher percentage of children under 18 live in married couple households as compared to the County. According to the 2014–2018 ACS 5-Year Estimates, approximately 84.0 percent of children under 18 live in married-couple households throughout the City, as shown on Figure B-17, Percent of Children in Married-Couple Families Map (located at the end of this appendix) compared to approximately 74.0 percent in the County as a whole. In the City, this rate is highest within the City in the 92602 zip code, where 90.0 percent of children under 18 live in married-couple households. A total of 7.5 percent of families in the City live below the poverty line.

### Children in Single Female-Headed Households

Single-parent households require special consideration and assistance because of their greater needs for daycare, healthcare, and other facilities. According to HCD, female-headed households with children tend to have lower incomes, thus limiting housing availability for this group. Fair housing laws protect single parent households. According to the 2014–2018 ACS 5-Year Estimates, approximately 9.0 percent of children under 18 in the 92602 and 92618 zip codes and approximately 11.0 percent of children under 18 in the 92620 zip code live in female-headed households, as shown on Figure B-18, Percent of Children in Single Female-Headed Households Map (located at the end of this appendix).



## Access to Opportunity

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

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

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

The Housing Plan (Chapter 8) of this Housing Element contains the following program related reducing exposure to environmental pollution:

- **PP-M.5: Reduce Exposure to Environmental Pollution.** The City is in the process and has taken several steps to identify climate impacts, reduce pollutants and greenhouse gas emissions (GHG), and prepare for a climate resilient future by completing the following:
  - A Local Hazard Mitigation Plan (adopted by City Council in October 2020 and approved by the Federal Emergency Management Agency (FEMA) on December 17, 2020).
  - A Strategic Energy Plan (adopted by City council on November 10, 2020).
  - Forming the first Community Choice Energy initiative in Orange County in an effort to give consumers clean energy choices and reduce GHG emissions (completed in 2022).
  - The development of a Climate Action and Adaptation Plan (in process) to:
    - Guide the implementation of measurable actions to meet or exceed the State's GHG reduction targets and climate neutrality goal, as well as the City's ambitious carbon neutral by 2030 goals.
    - Recommend adaptation measures that build resilience to current and future climate threats.

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- Emphasize climate goals for the community, establishing an aspirational, yet achievable path that provides options to realize aggressive emissions reduction targets by 2030, 2035, and 2045.
- Continuing to require added greenery throughout the City to reduce exposure to environmental pollution such as vehicle emissions through the City's Zoning Ordinance (Section 3-15-4) that requires boundary landscaping for all residential attached (i.e., multi-family) projects. The requirements dictate that a minimum of one 15-gallon tree shall be provided for every 30 feet of interior boundary on all building sites.
- Irvine Cool City Challenge, a \$1 million grant competition among California cities to develop the most innovative pathways to carbon neutrality, including the Cool Block program which requires recruiting 200 Cool Block team leaders to improve sustainability and quality of life in their own neighborhoods. This Challenge will reduce climate emissions and utility bills while building resiliency and local emergency preparedness against climate disasters such as extreme heat, floods, wildfires, and extreme storm events. The City has partnered with over 25 community organizations and registered over 200 volunteers who are interested and committed to climate action in Irvine to date.

Additionally, to further efforts to provide adequate parks and open space to all parts of the community, the City will prepare a comprehensive design strategy to include passive urban park setting for every project and include other placemaking strategies.

The City's existing Zoning Ordinance requires that green park space be provided in connection with new residential development. More specifically, the Ordinance contains park dedication requirements (i.e., land, improvements, fees, or any combination thereof) for all standalone multi-family residential projects. The existing development standards require five acres of park land for every 1,000 population (three acres of neighborhood park and two acres of community park). When new residential development occurs, the park requirements are prorated for the estimated population added. Affordable housing projects have a reduced requirement of three and one-half acres of park land for every 1,000 population (two acres of neighborhood park and one and one-half acres of community park). Park requirements in the Irvine Business Complex are somewhat different due to the urban living environment. These park requirements ensure that as residential development occurs throughout the City, green spaces and trees are planted to help further reduce the City's carbon footprint.

This program, as implemented, will reduce unsustainable energy use, reduce pollutants, improve air quality, reduce extreme heat events and improve the health outcomes of residents, employees and others in the community.

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## California Communities Environmental Health Screening Tool

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

Program PP-M.5 cited on the previous page addresses lower exposure to environmental pollution and details the City's significant efforts to date.

## Location of Environmental Health Hazards (Countywide)

The 2020 Orange County AI identified that the location of environmental health hazards may be a significant contributing factor to fair housing issues in the County. The analysis notes that “communities with a high concentration of Hispanics experience higher levels of environmental harms; exposure primarily stems from vehicle emissions due to the proximity of major freeways and the settling of smog in the area between the coast and the hills rather than the location of major industrial facilities. As a county that developed as a predominantly suburban area, there is no long history of heavy industrial activity in the area.”

The CalEnviroScreen 4.0 tool provides scores for all census tracts in the County. The areas south of and northeast of the City have ratings of 40 and lower while those northwest of the City have ratings of 50 or higher. The areas northwest of the City have higher concentrations of Hispanics than the rest of the County.

## Access to Public Transit

As stated in the 2015 Irvine AI, public transit provides mobility to people who cannot afford personal transportation or who elect not to drive. Elderly and disabled persons also rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Many lower income persons are also dependent on transit to go to work. Public transit that provides a link between job opportunities, public services and affordable housing helps to ensure that transit dependent residents have adequate opportunity to access housing, services and jobs.

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

## Orange County Transportation Authority

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

## Metrolink

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

## iShuttle

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

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

## OCTA ACCESS Program

In compliance with the Americans with Disabilities Act (ADA) and Title VI of the Civil Rights Act, OCTA provides paratransit service throughout Orange County through its OCTA ACCESS program. ACCESS is an eligibility-based service for persons unable to use regular fixed-route buses due to a disability. To be eligible for ACCESS, you must live within Orange County and be physically and/or cognitively unable to use a regular fixed-route bus. An in-person functional assessment will determine the applicant’s ability to get to and from the bus stop, get on and off the bus and navigate the regular bus system. Curb-to-curb service is available for \$3.60 each way.

## Transportation for Irvine Residents with Disabilities (TRIPS)

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

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#### Age Well Senior Services Program

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

#### AllTransit Performance Score

AllTransit is a data repository managed by the Center for Neighborhood Technology, an award-winning innovations laboratory for urban sustainability. AllTransit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. The City's AllTransit performance score is 3.6, while Orange County has a score of 4.2, illustrating a low combination of trips per week and number of jobs accessible, which enable only a few people to take transit to work in Orange County and even fewer in the City. Only 1.3 percent of workers in the City use public transportation (excluding taxicab) to get to work, which is less than Orange County's rate of 2.0 percent of workers. Figure B-19, Transit Proximity Map (located at the end of this appendix), illustrates what areas of the City are within a half-mile of a transit (primarily bus) stop. The locations of transit stops are based on data from Transitland, a community-edited data service aggregating transit networks across metropolitan and rural areas around the world.

Program **PP-B.3: Review the City's Development Standards** in the Housing Plan involves a review and update (as appropriate) of current Development Standards to encourage residential, mixed-use, and transit-oriented developments to allow more jobs to be created near transit and more residential units to be located near jobs and transit.

#### Proximity to Jobs

As shown on Figure B-20, Jobs Proximity Map (located at the end of this appendix), as measured by HUD's Jobs Proximity, the majority of Irvine has an index value of over 70. The higher the index value, the better the access to employment opportunities for residents in the neighborhood. The areas with the closest proximity to jobs in the County are those near the Irvine Business Complex, University of California, Irvine, Irvine Spectrum Center, and Orange County Great Park.

According to the 2014-2018 ACS 5-Year Estimates, the average commute travel times to work for City and County residents were 25.6 and 27.7 minutes, respectively. The area with the most limited access to jobs (as shown on Figure B-20 (located at the end of this appendix)) does have slightly higher rates of poverty or overpayment than other areas with index values between 40 and 59. Irvine is a major job center in Orange County, there are 128,029 workers living within

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the City who are employed across 13 major industrial sectors. Chapter 2 of the Housing Element presents additional information on employment by industry and occupation.

The 2020 Orange County AI does not identify the location of employers as a significant contributing factor to fair housing issues in the County. It also notes that there is no clear relationship between patterns of occupancy by race or ethnicity and where major job centers are in the County. This is consistent with conditions in the City, where job access is strong.

### Education

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

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

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

Figure B-21, Schools Proximity Map (located at the end of this appendix), shows what areas of the City are within one mile of a school. School access is consistent throughout the City, with a significant majority of the City’s area and 14.0 percent of the projected units in the Sites Inventory located within one mile of a school. All projected units are within 2.6 miles from a school. Most of the schools are considered high-quality, according to School-Ratings.com, with ratings distributed from the 71st to the 99th percentiles. As noted in Chapter 2 of the Housing Element, the Irvine Unified School District holds the distinction of the top school district in Orange County and is ranked #13 in the State out of 440 school districts.

The 2020 Orange County AI identified that the location of proficient schools and school assignment policies may be a significant contributing factor to fair housing issues in the County. It notes, “the location of proficient schools and school assignment policies may be significant contributing factors to fair housing issues in Orange County. The schools with the highest proficiency in Orange County are generally located in coastal areas and hillside areas rather



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than in the center of the county, though Irvine is an exception. This distribution of proficient schools maps on to patterns of residential racial and ethnic segregation, with disproportionately White population in areas with high performing schools and relatively low Hispanic population in those areas. Public education in Orange County is highly fragmented with 27 school districts serving the county's students. District boundaries frequently map onto municipal boundaries, which in turn correlate to patterns of segregation. Inter-district transfers are only available for extremely limited circumstances.”

**However, it is important to note that the concerns identified in the 2020 Orange County AI is not a concern on the City level.** All City residents, regardless of race or income, have access to all the City's highly proficient schools through the intradistrict/school choice process, which is only restricted by space availability. The City does have small areas outside of the Irvine Unified School District area. These areas are in the Orange, Santa Ana, Tustin, and Saddleback Valley Unified School Districts, and they include areas with Hispanic and other minority concentrations. Nevertheless, these areas are relatively small portions of the City.

### Population with a Disability

The ADA defines a disability as a “physical or mental impairment that substantially limits one or more major life activities.” Fair housing choice for persons with disabilities can be compromised based on the nature of their disability. Persons with physical disabilities may face discrimination in the housing market because of the use of wheelchairs, need for home modifications to improve accessibility, or other forms of assistance. Landlords/owners sometimes fear that a unit may sustain wheelchair damage or may refuse to exempt disabled tenants with service/guide animals from a no-pet policy. A major barrier to housing for people with mental disabilities is opposition based on the stigma of mental disability. Property owners often refuse to rent to tenants with a history of mental illness. Neighbors may object when a house becomes a group home for persons with mental disabilities.

According to 2014–2018 ACS 5-Year Estimates, 3,147,477 residents in Orange County (8.6 percent of all County residents) were identified as having a disability. The percentage of population with disabilities in the Irvine-Lake Forest County Subdivision is 5.7 percent. Figure B-22, Percent of People with Disabilities Regional Map, (located at the end of this appendix) takes a regional view, illustrating the share of residents with a disability in the Irvine-Lake Forest County subdivision and adjacent County subdivisions. The Orange County Regional Center, which is the regional center contracted by the California Department of Developmental Services, provides programs and services that further aid in meeting the needs of those with physical, mental, and developmental disabilities for Orange County residents.

According to the 2014-2018 ACS, 14,676 City residents, approximately 5.5 percent, of the Irvine population were identified as having a disability. The most common type of disability experienced by Irvine residents is ambulatory difficulty. Other common disabilities are, in order of prevalence,

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independent living difficulty, cognitive difficulty, hearing difficulty, self-care difficulty, and vision difficulty. Special housing needs for persons with disabilities fall into two general categories:

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

According to the 2014-2018 ACS, 5,336 persons (36.0 percent of City residents) with a disability have a developmental disability. As shown on Figure B-23, Percent of People with Disabilities Local Map (located at the end of this appendix), the census block groups with the highest concentration of people with disabilities (i.e., more than 14.5 percent) are in Planning Area 11. The City has Disability Services that provide support services and social programs to persons with disabilities, their families, caregivers and providers, who live or work in Irvine. Services and programs include:

- Social and Recreational programs for all ages.
- Community Disability Awareness Events.
- Disability Awareness Training.
- Irvine Residents with Disabilities Advisory Board.
- Access Reporting.
- Inclusion and Accommodation support.
- Collaborations with Community Disability Agencies.

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

In order to address this issue, the Housing Plan contains the following four programs to increase the supply of housing, including affordable housing, for persons with disabilities:

- **PP-B.2: Expedite Development.** The City will expedite development of housing projects for seniors, people with disabilities, and lower-income people and/or households.
- **PP-F.2: Irvine Community Land Trust.** The City seeks to continue to strengthen its relationship with the ICLT to collaborate and partner on efficiently and effectively maximizing affordable housing opportunities. This program will call for assisting the ICLT and developers in accessing public funding and financing and through new construction to increase supply of permanently affordable rental units with supportive services that target seniors and persons with disabilities and extremely low-income households.

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- **PP-I.2: Housing Options.** Many funding sources have specific eligibility criteria or other requirements that may not always align with potential projects in Irvine. The City will pursue relevant State and Federal funding sources to provide additional options for developers of lower-income housing that serve veterans, individual, and families at-risk of and currently experiencing homelessness in the City. The City will ensure that such housing options will include reasonable accommodations and transitional and supportive services for people with disabilities.
- **PP-I.3: Leverage All Funding Options.** The City will explore the feasibility of joining the Orange County Housing Finance Trust (OCHFT), a joint power authority composed of many Orange County cities. The OCHFT can provide additional funding options for affordable housing developers. The City will ensure that housing options will include reasonable accommodations and supportive services for people with disabilities.

### Access to Opportunity (Countywide)

In the 2020 Orange County AI, the County conducted an analysis of the lack of access to opportunity due to high housing costs, which the County identified as a potentially significant contributing factor to fair housing issues in the County. The analysis revealed, “coastal areas of Orange County [and] far eastern portions of the county have greater access to educational, economic, and environmental opportunity than do most areas in between, with the partial exception of Irvine. Additionally, environmental quality is higher in predominantly White southern Orange County than in the more diverse areas to the north. In general, the disproportionately White coastal and hillside communities with better educational, economic, and environmental outcomes are also areas with high housing costs. Increasing housing affordability in these areas would make it easier for low-income households, disproportionately including Hispanic and Vietnamese households, to access the types of services and amenities that further social mobility.”

The City is located in what is commonly considered central Orange County, but some consider Irvine a part of south Orange County. Irvine is more ethnically and culturally diverse than the south Orange County cities, which are predominately White. The number of housing units created in Irvine between 2013 and 2020 is over 31,000, with a high proportion of units available to very low to moderate income households, which far exceeds the affordable housing units (and market rate housing units) built in other Orange County cities. The City seeks to continue to lead the way in housing unit production, including lower income housing units on the sites identified in the Site Inventory.

### Disproportionate Housing Need and Displacement Risk

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

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

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

Table B-4, Impacts on Patterns of Disproportionate Housing Needs, provides a summary of the analysis that includes the number of units per site by income group for each of the AFFH categories relative to the impacts on patterns of disproportionate housing needs. The table analyzes the following categories:

- **Overpayment/Cost Burden:** The analysis evaluates the number of units in the Sites Inventory that are in areas where the majority (more than 50 percent) of households experience housing cost burden. The analysis differentiates between ownership cost burden and rent burden.
- **White Concentration:** Number of units in the Sites Inventory in areas with a White concentration (i.e., the White percentage of the population exceeds the County average).
- **Asian Concentration:** Number of units in the Sites Inventory in areas with an Asian concentration (i.e., the percentage of the Asian population exceeds the County average).
- **Overcrowding:** Number of units in areas where the rates of overcrowding and/or severe overcrowding exceed the County average.
- **Areas of Affluence:** Number of units in areas of affluence.
- **R/ECAP:** Number of units in Racially/Ethnicly Concentrated Areas of Poverty (R/ECAP).
- **Displacement:** Number of units in areas where there is a risk of displacement.

The City is adding housing based on the need in each of the categories. Table B-4 shows that 46.0 percent of all the units from the Sites Inventory are in areas where over 50 percent of homeowners are cost burdened. In comparison, 21.0 percent of units are in areas where over 50 percent of renter households are rent burdened.

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Another way to measure the relative cost or rent burden is by comparison to the countywide average. Of the City’s 121 census tract block groups, 47 have a greater share of households with a cost burden than the County average (28.0 percent) and 37 block groups have a greater share of households with a rent burden than the County average (55.0 percent). To help address the cost and rent burdens, 10,226 lower-income housing units in the site inventory (76.0 percent of all lower-income housing units in the Sites Inventory) are in the block groups with either a higher cost burden share or a higher rent burden share.

Approximately 23.0 percent of units are in areas with a White concentration and the same percentage are in areas with an Asian concentration. More lower-income units (42.0 percent) are located in Asian concentration than in White concentration areas (11.0 percent). In contrast, more moderate and above-moderate units (26.0 percent) are located in areas with a White concentration than areas with an Asian concentration (17.0 percent). This contrast is not a concern because of the relative wealth of the City’s Asian community.

There are 17,289 units in the Sites Inventory (28.0 percent of all units) located in areas experiencing overcrowding, which will help provide additional housing units to alleviate overcrowding in these areas. Almost 34.0 percent of the lower-income units in the Sites Inventory are in areas with overcrowding.

Approximately 2.0 percent of the total sites are in areas of affluence. This is due primarily to the fact that affluent areas are mostly built out, with few sites for potential new development. Less than 2.0 percent of units are in R/ECAP areas, which shows the City has distributed the units in the Sites Inventory in a way that will not concentrate affordable housing in these areas. No units are in areas designated as susceptible to displacement because there are no census tracts in the City identified as susceptible to displacement.

**Table B-4. Impacts on Patterns of Disproportionate Housing Needs**

Site Inventory Units	Total Units	Overpayment		White	Asian	Over-crowding	Areas of Affluence	R/ECAP	Dis-placement
		Owner Cost Burden	Rent Burden						
Lower	13,376	6,655	2,162	1,496	5,635	4,524	3	495	-
Moderate	4,934	1,996	1,392	1,289	770	1,209	109	43	-
Above Moderate	43,829	20,043	9,582	11,579	7,720	11,556	984	385	-
<b>Total</b>	<b>62,139</b>	<b>28,694</b>	<b>13,136</b>	<b>14,364</b>	<b>14,125</b>	<b>17,289</b>	<b>1,096</b>	<b>923</b>	<b>-</b>

**In order to ensure that this displacement does not become a problem in the City, the following program is included in the Housing Plan:**

- **PP-J.2: Displacement Prevention.** As stated in the AFFH section of this HEU, Census data indicates that there are no census tracts in the City identified as susceptible to displacement. The City’s housing planning efforts contributed to the creation of 2,053 of lower income

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housing units during the 5<sup>th</sup> cycle planning period alone (including over 200 extremely low-income units) is likely a contributing factor to this data point. The City's primary (and very effective) effort in displacement prevention is facilitating the development of affordable housing in the community, as referenced in the AFFH section of this HEU. This Housing Plan contains twenty-five (25) programs to encourage and facilitate the development of affordable housing, including amending the zoning ordinance to require that 20 percent of all housing units developed in the City are affordable to very low, low and moderate income households, working with the ICLT on the development of affordable units that will remain affordable into perpetuity, leveraging publicly owned land assets for a large number of affordable housing units, and examining the establishment of a housing authority. Affordable housing development will reduce the risk of resident displacement due to an inability to afford their home.

Displacement prevention activities will also include connecting residents to resources to minimize the displacement of households with lower incomes and special needs whenever possible and where necessary to ensure that displacement is carried out in an equitable manner.

The City will participate in the Orange County United Way's Eviction Task Force and associated study. This work includes identifying and coordinating community resources to support households facing eviction.

## Overpayment

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

## Cost Burden among Renters

According to the 2014-2018 ACS 5-Year Estimates, approximately 53.0 percent of housing units in the City are occupied by renters, higher than in the SCAG region that has a renter share of approximately 47.0 percent as shown on Figure 2-24 in Chapter 2 of the Housing Element. In the County, 28.2 percent of renter households have a rent burden greater than 30 percent of their income. In 47 of the City's 121 block groups, the share of cost burden renter households is even greater. As shown on Figure B-24, Renter Cost Burden Map (located at the end of this appendix), there are rent-burdened households throughout the City of Irvine. The highest concentration of renters overpaying for housing are near the University of California, Irvine, and in the Turtle Ridge and Shady Canyon neighborhoods.

In order to address this issue, the City is proposing the following:



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- The City is currently in discussions with the University of California, Irvine regarding student and faculty housing.
- The Housing Plan contains twenty-five (25) programs to encourage and facilitate the development of affordable housing, including amending the zoning ordinance to require that 20 percent of all housing units developed in the City are affordable to very low, low and moderate income households, working with the ICLT on the development of affordable units that will remain affordable into perpetuity, leveraging publicly owned land assets for a large number of affordable housing units, and examining the establishment of a housing authority. Affordable housing development will reduce the risk of resident displacement due to an inability to afford their home. Additional housing programs, as listed below, will allow for more multifamily and other types of residential development in general will provide more housing choice for tenants.
- **PP-L.1: Update and Implement the City’s General Plan - Land Use Element/Amend Zoning Ordinance.** The City will update its Land Use Element and amend the Zoning Ordinance by October 2024 to update the Zoning Code to be consistent with State laws enacted over the past 8 years, increase the inclusionary housing requirement to 15 percent lower income units and 5 percent moderate income units (20 percent affordable units in total required for all market rate housing developments), increase densities for required Housing Element sites to meet densities required by State law, encourage housing development to serve all income levels throughout the City (particularly in resource-advantaged areas), and encourage placemaking, public spaces, capital improvements, active transportation infrastructure, and community amenities.
- **PP-A.3: Residential Overlays in Non-Residential Areas:** The City will establish zoning overlays to allow for multifamily residential in nonresidential areas (which may include properties designated for religious institutions and schools) to provide flexibility in land use and development standards, including mixed-use developments. These flexible standards shall be directed toward meeting the physical, social, and economic needs of the community. The City will adhere to the requirements of Government Code section 65583.2, subdivisions (h) and (i), as part of the rezoning program, including applicable by-right provisions, and the residential overlay zones in nonresidential areas will allow for densities of 30 units/acre, allow for 100% residential use, and will require residential use to occupy 50% of floor area on mixed use projects.
- **PP-A.4: Encourage the Subdivision of Sites that Are 10 or More Acres.** The City will encourage the subdivision of sites that are 10 acres or more to provide more opportunities for development of affordable housing, which the HCD has determined is more feasible on sites between 0.5 and 10 acres in size. Schedule of Action: City staff will coordinate with property owners of large sites (both public and private) on an annual and ongoing basis. **The Housing Element site inventory identifies six sites that are larger than 10 acres in size, all of**

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which are owned by public agencies (including the City and County). Of the six sites that exceed 10 acres in size, four are in Planning Area 51 which is the location of the closed former Marine Corps Air Station El Toro military base that is currently being redeveloped as the Great Park. As detailed in Chapter 7, Sites Inventory of this Housing Element, there is a long history with successful subdividing of very large parcels in the City to create 100 percent affordable housing, particularly in east of the 5 freeway and in and around Planning Area 51.

All six sites are in areas with a multitude of resources as they are located near transit (six are very close to the Irvine Station), major employment centers in the City, health care (including the planned City of Hope campus), parks, open space, new schools, and provide access to the iShuttle (City-run bus service). The Great Park area is still in the process of developing pursuant to a master plan that includes a residential mixed use overlay for Planning Area 32 which is located adjacent to the six sites in Planning Area 51 (as well as Irvine Station). Therefore, neighborhood serving retail and services are planned to be developed which will provide the affordable units planned in the area access to job centers, grocery stores, and other services. In addition, the City is planning a micro transit system that will connect residents in this area to larger job centers.

This large amount of available publicly owned land located in and near high resource areas presents a critical opportunity to develop a significant amount of affordable housing to address a very significant need.

- **PP-C.1: Update the City’s Zoning Ordinance to Allow for Higher Densities in Areas with Underdeveloped/Underutilized Property.** The City will update the current Zoning Ordinance to establish higher density in areas with underdeveloped/underutilized property, such as Planning Areas 32 (adjacent to the Irvine Station served by Amtrak/Metrolink passenger rail services and Orange County Transportation Authority bus services), 33, and 36 (a.k.a., Irvine Business Complex or “IBC” near John Wayne Airport). This update will maximize land utilization for residential development to accommodate RHNA requirements, including allowing residential overlays in commercial areas to allow for residential to be added to commercial areas or to allow existing underutilized commercial uses to be converted to residential (i.e., hotels). The residential overlays will conform to Government Code requirements, as described in Program PP-A.3. Schedule of action: by October 2024.
- **PP-B.7: Senate Bill (SB) 35 Streamlined and Ministerial Approval Process.** The City will establish streamlined, ministerial review procedures and processes for qualifying multi-family residential projects consistent with SB 35 within one year of Housing Element certification.
- **PP-C.2: Establish ADU Policies to Comply with Changes in State Law.** Multiple State laws have been passed since 2019 establishing statewide standards for local regulations governing ADU development. State law requires that ADUs be allowed in residential and mixed-use areas despite local ordinances or homeowner’s association rules and

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requirements. Additionally, State law requires jurisdictions to develop a plan to encourage and incentivize ADUs to address the current California housing crisis. Schedule of action: by January 2023.

- **PP-C.3: Remove Barriers for ADUs.** The City will work with the U.S. Postal Service and the Orange County Fire Authority to develop solutions for address, mail delivery, and public safety service/response issues that have surfaced through the processing of setting City ADU policies. Additionally, the update to the City's Zoning Ordinance, as described in several programs in this chapter, will include updating the City's parking standards to adhere to current State law requirements regarding ADUs.
- **PP-C.4: Encourage and Incentivize ADUs.** Assembly Bill (AB) 671 requires local agencies' Housing Elements to include a plan that incentivizes and promotes the creation of ADUs that can offer affordable rents for households with very-low-, low-, or moderate-income households. As part of the ADU ordinance update (including public outreach), the City will research feasible options to facilitate affordable housing options for ADUs *by the end of 2022 and begin providing incentives by January 2023*. These options may include pre-approved ADU plans or kits or reduced or waived building permit fees for property owners who provide annual rent information so that the City can track affordable housing provided by ADU for extremely low, very low, low and/or moderate-income households. The City will potentially extend the duration of incentives at the end of the planning period (by January 2031) if the data on the efficacy supports continuing the program. The goal of this program is to reduce the amount of time and expense property owners would take on in considering or moving forward with ADUs.
- **PP-E.5: Utilize Available Funding Tools and/or Public/Private Partnerships to Create Lower Income and Workforce Housing.** The City will identify and utilize State programs and/or potential public/private partnerships with major employers to acquire existing market rate housing units or develop new housing units to create moderate or workforce housing (available to households with incomes at 80 percent to 120 percent of AMI).

In February 2022, the City Council approved the broad terms and conditions under which the City will participate in the Middle Income Housing Program. Subsequently, the City executed Public Benefit and Joint Power agreements to convert existing market rate apartment units to affordable units at The Royce Apartments. More specifically, the first agreement approved is with the California Statewide Communities Development Authority (CSCDA) and the Waterford Property Group to issue approximately tax-exempt bonds to finance the acquisition, maintenance and operations of The Royce Apartments, a 520-unit apartment development. Under the agreement, one-third of the units will be designated for persons earning no more than 80% of AMI (low income), one-third for those earning up to 100% of AMI (moderate income), and one-third for those earning a maximum of 120% of AMI

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(moderate income). Rent restrictions would expire upon full repayment of the bonds, which are projected to be paid off in 35 years.

Other Potential programs could include concessions or incentives to large existing or future Irvine employers, and/or collaborations between employers and developers to make affordable housing projects and/or conversions feasible.

- **PP-F.2: Irvine Community Land Trust.** The City seeks to continue to strengthen its relationship with the ICLT to collaborate and partner on efficiently and effectively maximizing affordable housing opportunities. To this end, the City will pursue the following:
  - Coordinate with the ICLT to actively pursue land acquisition opportunities for a range of affordable housing options, including rental apartments, ownership housing, transitional housing, supportive housing, and single-room occupancy housing.
  - Collaborate to determine feasibility of developing permanently affordable housing in partnership with the ICLT on publicly owned sites that may be designated as surplus property.
  - Assist the ICLT and developers to access public funding and financing and through new construction to increase supply of permanently affordable rental units with supportive services that target seniors and persons with disabilities and extremely low-income households.
  - Partner with the ICLT to seek legislative support for:
    - Public funding resources and prioritization of those sources to advance the development of permanently affordable rental and ownership housing at all affordable income levels.
    - Legislative changes that remove sunset provisions for affordable housing developments.
- **PP-F.3: Collaborate with Public Agencies to Leverage Other Publicly Owned Land for the Development of Affordable Housing Projects through Master Planning and Disposition Efforts.** The City will coordinate with public agencies to facilitate the development of affordable housing projects on vacant and underutilized sites, including sites owned by the County of Orange, the State, and the Irvine Ranch Water District. Activities could include collaboration with public agencies on master-planning and disposition efforts for large vacant and underutilized sites. For instance, the County of Orange currently owns significant property near the Irvine Station. Under this program, the City would work with the County to develop affordable housing strategies for these properties.

As mentioned previously, Chapter 2 of the Housing Element uses the Southern California Association of Governments pre-certified data that includes information from HUD on the number of households in the City who pay 30 percent or more of their gross income on housing

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costs. More specifically, 50 percent of the City’s renter households spend 30 percent or more of gross income on housing costs, compared to 55 percent in the SCAG region. Additionally, 26.0 percent of renter-occupied households experience a severe housing cost burden (i.e., above 50 percent of gross income), compared to 29.0 percent in the SCAG region as illustrated on Figures 2-22 and 2-23 in Chapter 2 of the Housing Element.

Renter households in the City are less likely to experience rent burden than renters countywide. According to the 2014-2018 ACS 5-Year Estimates, renter households are more likely than owner-occupied households are to experience housing cost burden.

### Cost Burden among Owners

According to the 2014-2018 ACS 5-Year Estimates, approximately 47.0 percent of housing units in the City are owner occupied. Among homeowners, overpayment is most prevalent for households with incomes of \$74,999 or less. Approximately 92.0 percent of Irvine mortgage-holding households with incomes of \$74,999 or less have payments that exceed 30 percent of the household income, while only 28.0 percent of households with incomes of \$75,000 or more have payments that exceed 30 percent of income (Figures 2-24 and 2-25 in Chapter 2 of the Housing Element). As shown on Figure B-25, Owner Cost Burden Map, the most concentrated areas of overpayment for owner-occupied housing are near Orange County Great Park, Irvine Spectrum Center, Turtle Ridge, Irvine Valley College, and Lower Peters Canyon. Citywide, 31.0 percent of owner-occupied households with a mortgage have a cost burden. The rate is the same for the County as a whole. The fact that owner-occupied households in the City are as likely to be cost burdened as their Countywide counterparts suggests the City has a reasonable supply of relatively affordable ownership housing options, but could potentially do more to support homeowners.

In order to address this issue, the Housing Plan contains the following programs to provide education, financial assistance for repairs and maintenance and support:

- **PP-K.1: Homeownership Education.** The City will encourage homeownership through education, sharing information, and links to existing nonprofit, County, State, and Federal resources on the City’s website on an ongoing basis and updated annually for accuracy. Many residents lack the knowledge about mortgages in addition to having limited financial resources. Information on homeownership will be published in a variety of languages and will be provided to community organizations that work with different populations to ensure greater homeownership diversity.
- **PP-K.2: Residential Rehabilitation Program.** This existing program provides financial assistance to lower-income Irvine homeowners for critical home improvement projects. Financial assistance through the program includes low interest, deferred loans and emergency grants. This program assists homeowners in need of health and safety, building



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code and accessibility-related repairs on an ongoing basis. Only owner-occupied single-family dwellings or manufactured homes located in the City of Irvine are eligible for this funding. Program information will be provided on the City website and at public counters, as well as through the city's Code Enforcement program on an ongoing basis and updated on an annual basis to ensure accuracy.

#### **PP-M.7: Support for Homeowners. The City will conduct a bi-annual survey of homeowners to obtain input on existing programs and to identify additional ways to support the City's homeowners and their unique needs. Overcrowding**

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

Household overcrowding is considered reflective of various living situations:

- a. A family lives in a home that is too small.
- b. A family chooses to house extended family members.
- c. Unrelated individuals or families are doubling up to afford housing. Not only is overcrowding a potential fair housing concern, but it can also strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes.

As described in Chapter 2 of the Housing Element, overcrowding is not a significant problem, with 4.0 percent of the total housing units in the City living in overcrowded situations. Throughout the Southern California Associations of Governments area, 10.0 percent of households are overcrowded. More specifically in the City, the 2014-2018 ACS 5-Year Estimates indicate that 958 homeowner and 4,921 renter households had more than one occupant per room. Of these households, 288 homeowner households and 1,484 renter households (a combined 2.0 percent of all City households, compared to 4.0 percent in the SCAG area) had more than 1.5 occupants per room, which meets the ACS definition of "severe overcrowding" (Figure 2-27 in Chapter 2 of the Housing Element).

### **Housing Conditions**

As discussed in the Community Profile, a relatively low number of housing units in Irvine need some rehabilitation due to age or incomplete facilities. Substandard housing issues can include structural hazards, poor construction, faulty wiring or plumbing, fire hazards, and inadequate



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sanitation or facilities for living. The 2014–2018 ACS 5-Year Estimates indicate the following on substandard housing issues in the City:

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

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

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

### Displacement Risk

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

The UDP defines “residential displacement” as “the process by which a household is forced to move from its residence – or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control.” As part of this research project, the UDP has an interactive map that display changes in neighborhood characteristics that may indicate displacement.

The UDP identifies sensitive communities as those that have neighborhoods with a high proportion of residents vulnerable to displacement in the case of rising housing costs and market-based displacement pressures present in and/or near the community. There are no census tracts in the City labeled as susceptible to displacement by the UDP. Much of the City is designated as “Stable/Advanced Exclusive,” especially south of Jamboree Road and east of Interstate 5. This designation indicates high housing costs and high-income households. To address this classification, the City is including lower-income sites in the site inventory throughout the City.

The 2020 Orange County AI also used UDP for a displacement risk analysis and noted that displacement of residents due to economic pressures may be a significant contributing factor to fair housing issues in the County and, “in particular, in parts of Orange County that have historically had concentrations of low-income Hispanic and Vietnamese residents.” The Orange

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County AI also notes, “the areas most vulnerable to gentrification and displacement in Orange County – going forward – are disadvantaged areas located near areas that have already gentrified and disadvantaged areas, located near major transit assets as well as other anchor institutions like universities and hospitals. Because the southern and coastal portions of Orange County have relatively few disadvantaged areas, displacement risk is therefore concentrated in inland portions of central and northern Orange County such as Anaheim, Fullerton, Garden Grove, Irvine, Orange, Santa Ana, and Westminster. These areas also tend to have higher Hispanic and Asian population concentrations than the county as a whole, illustrating the fair housing implications of displacement.”

It is unclear why the 2020 Orange County AI included the City in its list of areas with concentrated displacement risk, given that no areas in the City are designated as susceptible to displacement. However, there are census tracts immediately north and south of the City that are designated as “Low-Income/Susceptible to Displacement,” “Ongoing Displacement,” or “Advanced Gentrification.”

In order to address this issue, the Housing Plan in this HEU contains twenty-five (25) programs to encourage and facilitate the development of affordable housing, including amending the zoning ordinance to require that 20 percent of all housing units developed in the City are affordable to very low, low and moderate income households, working with the ICLT on the development of affordable units that will remain affordable into perpetuity, leveraging publicly owned land assets for a large number of affordable housing units, and examining the establishment of a housing authority. Affordable housing development will reduce the risk of resident displacement due to an inability to afford their home. Additional housing programs, as listed below, will allow for more multifamily and other types of residential development in general will provide more housing choice for tenants.

More specifically, the Housing Plan contains the following programs:

- **PP-J.2: Displacement Prevention.** As stated in this section, Census data indicates that there are no census tracts in the City identified as susceptible to displacement. The City’s housing planning efforts contributed to the creation of 2,053 of lower income housing units during the 5th cycle planning period alone (including over 200 extremely low-income units) is likely a contributing factor to this data point. The City’s primary (and very effective) effort in displacement prevention is facilitating the development of affordable housing in the community, as referenced in the AFFH section of this HEU. This Housing Plan contains twenty-five (25) programs to encourage and facilitate the development of affordable housing, including amending the zoning ordinance to require that 20 percent of all housing units developed in the City are affordable to very low, low and moderate income households,

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working with the ICLT on the development of affordable units that will remain affordable into perpetuity, leveraging publicly owned land assets for a large number of affordable housing units, and examining the establishment of a housing authority. Affordable housing development will reduce the risk of resident displacement due to an inability to afford their home.

Displacement prevention activities will also include connecting residents to resources to minimize the displacement of households with lower incomes and special needs whenever possible and where necessary to ensure that displacement is carried out in an equitable manner.

The City will participate in the Orange County United Way's Eviction Task Force and associated study. This work includes identifying and coordinating community resources to support households facing eviction.

- **PP-J.3: Legal Assistance for Renters.** The City will continue to provide readily available information in the Irvine Affordable Housing Guide available at City Hall. The City will provide a link on its website to landlord/tenant mediation services and landlord/tenant rights and responsibilities, which may include information from service providers such as the Fair Housing Foundation. The City will also add information on the City's website and provide resources on non-profits such as Community Legal Aid SoCal and the Legal Aid Society of OC. Information will be provided in a variety of languages and to community organizations that work with different populations.
- **PP-L.1: Update and Implement the City's General Plan - Land Use Element/Amend Zoning Ordinance.** The City will update its Land Use Element and amend the Zoning Ordinance *by October 2024* to update the Zoning Code to be consistent with State laws enacted over the past 8 years, increase the inclusionary housing requirement to 15 percent lower income units and 5 percent moderate income units (20 percent affordable units in total required for all market rate housing developments), increase densities for required Housing Element sites to meet densities required by State law, encourage housing development to serve all income levels throughout the City (particularly in resource-advantaged areas), and encourage placemaking, public spaces, capital improvements, active transportation infrastructure, and community amenities.
- **PP-A.3: Residential Overlays in Non-Residential Areas:** The City will establish zoning overlays to allow for multifamily residential in nonresidential areas (which may include properties designated for religious institutions and schools) to provide flexibility in land use and development standards, including mixed-use developments. These flexible standards shall be directed toward meeting the physical, social, and economic needs of the community. The City will adhere to the requirements of Government Code section 65583.2, subdivisions (h) and (i), as part of the rezoning program, including applicable by-right provisions, and the residential overlay zones in nonresidential areas will allow for densities of 30 units/acre, allow

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for 100% residential use, and will require residential use to occupy 50% of floor area on mixed use projects.

- **PP-A.4: Encourage the Subdivision of Sites that Are 10 or More Acres.** The City will encourage the subdivision of sites that are 10 acres or more to provide more opportunities for development of affordable housing, which the HCD has determined is more feasible on sites between 0.5 and 10 acres in size. The Housing Element site inventory identifies eight sites that are larger than 10 acres in size, all of which are owned by public agencies (including the City and County). Of the eight sites that exceed 10 acres in size, eight are in Planning Area 51 which is the location of the closed former Marine Corps Air Station El Toro military base that is currently being redeveloped as the Great Park. As detailed in Chapter 7, Sites Inventory of this Housing Element, there is a long history with successful subdividing of very large parcels in the City to create 100 percent affordable housing, particularly in east of the 5 freeway and in and around Planning Area 51.

All eight sites are in areas with a multitude of resources as they are located near transit (six are very close to the Irvine Station), major employment centers in the City, health care (including the planned City of Hope campus), parks, open space, new schools, and provide access to the iShuttle (City-run bus service). The Great Park area is still in the process of developing pursuant to a master plan that includes a residential mixed use overlay for Planning Area 32 which is located adjacent to the six sites in Planning Area 51 (as well as Irvine Station). Therefore, neighborhood serving retail and services are planned to be developed which will provide the affordable units planned in the area access to job centers, grocery stores, and other services. In addition, the City is planning a micro transit system that will connect residents in this area to larger job centers.

This large amount of available publicly owned land located in and near high resource areas presents a critical opportunity to develop a significant amount of affordable housing to address a very significant need.

- **PP-C.1: Update the City’s Zoning Ordinance to Allow for Higher Densities in Areas with Underdeveloped/Underutilized Property.** The City will update the current Zoning Ordinance to establish higher density in areas with underdeveloped/underutilized property, such as Planning Areas 32 (adjacent to the Irvine Station served by Amtrak/Metrolink passenger rail services and Orange County Transportation Authority bus services), 33, and 36 (a.k.a., Irvine Business Complex or “IBC” near John Wayne Airport). This update will maximize land utilization for residential development to accommodate RHNA requirements, including allowing residential overlays in commercial areas to allow for residential to be added to commercial areas or to allow existing underutilized commercial uses to be converted to residential (i.e., hotels). The residential overlays will conform to Government Code requirements, as described in Program PP-A.3. Schedule of action: by October 2024.

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- **PP-B.7: Senate Bill (SB) 35 Streamlined and Ministerial Approval Process.** The City will establish streamlined, ministerial review procedures and processes for qualifying multi-family residential projects consistent with SB 35 within one year of Housing Element certification.
- **PP-C.2: Establish ADU Policies to Comply with Changes in State Law.** Multiple State laws have been passed since 2019 establishing statewide standards for local regulations governing ADU development. State law requires that ADUs be allowed in residential and mixed-use areas despite local ordinances or homeowner’s association rules and requirements. Additionally, State law requires jurisdictions to develop a plan to encourage and incentivize ADUs to address the current California housing crisis. Schedule of action: by January 2023.
- **PP-C.3: Remove Barriers for ADUs.** The City will work with the U.S. Postal Service and the Orange County Fire Authority to develop solutions for address, mail delivery, and public safety service/response issues that have surfaced through the processing of setting City ADU policies. Additionally, the update to the City’s Zoning Ordinance, as described in several programs in this chapter, will include updating the City’s parking standards to adhere to current State law requirements regarding ADUs.
- **PP-C.4: Encourage and Incentivize ADUs.** Assembly Bill (AB) 671 requires local agencies’ Housing Elements to include a plan that incentivizes and promotes the creation of ADUs that can offer affordable rents for households with very-low-, low-, or moderate-income households. As part of the ADU ordinance update (including public outreach), the City will research feasible options to facilitate affordable housing options for ADUs by the end of 2022 and begin providing incentives by January 2023. These options may include pre-approved ADU plans or kits or reduced or waived building permit fees for property owners who provide annual rent information so that the City can track affordable housing provided by ADU for extremely low, very low, low and/or moderate-income households. The City will potentially extend the duration of incentives at the end of the planning period (by January 2031) if the data on the efficacy supports continuing the program. The goal of this program is to reduce the amount of time and expense property owners would take on in considering or moving forward with ADUs.
- **PP-E.5: Utilize Available Funding Tools and/or Public/Private Partnerships to Create Lower Income and Workforce Housing.** The City will identify and utilize State programs and/or potential public/private partnerships with major employers to acquire existing market rate housing units or develop new housing units to create moderate or workforce housing (available to households with incomes at 80 percent to 120 percent of AMI).

In February 2022, the City Council approved the broad terms and conditions under which the City will participate in the Middle Income Housing Program. Subsequently, the City executed Public Benefit and Joint Power agreements to convert existing market rate apartment units

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to affordable units at The Royce Apartments. More specifically, the first agreement approved is with the California Statewide Communities Development Authority (CSCDA) and the Waterford Property Group to issue approximately tax-exempt bonds to finance the acquisition, maintenance and operations of The Royce Apartments, a 520-unit apartment development. Under the agreement, one-third of the units will be designated for persons earning no more than 80% of AMI (low income), one-third for those earning up to 100% of AMI (moderate income), and one-third for those earning a maximum of 120% of AMI (moderate income). Rent restrictions would expire upon full repayment of the bonds, which are projected to be paid off in 35 years.

Other Potential programs could include concessions or incentives to large existing or future Irvine employers, and/or collaborations between employers and developers to make affordable housing projects and/or conversions feasible.

- **PP-F.2: Irvine Community Land Trust.** The City seeks to continue to strengthen its relationship with the ICLT to collaborate and partner on efficiently and effectively maximizing affordable housing opportunities. To this end, the City will pursue the following:
  - Coordinate with the ICLT to actively pursue land acquisition opportunities for a range of affordable housing options, including rental apartments, ownership housing, transitional housing, supportive housing, and single-room occupancy housing.
  - Collaborate to determine feasibility of developing permanently affordable housing in partnership with the ICLT on publicly owned sites that may be designated as surplus property.
  - Assist the ICLT and developers to access public funding and financing and through new construction to increase supply of permanently affordable rental units with supportive services that target seniors and persons with disabilities and extremely low-income households.
  - Partner with the ICLT to seek legislative support for:
    - Public funding resources and prioritization of those sources to advance the development of permanently affordable rental and ownership housing at all affordable income levels.
    - Legislative changes that remove sunset provisions for affordable housing developments.
- **PP-F.3: Collaborate with Public Agencies to Leverage Other Publicly Owned Land for the Development of Affordable Housing Projects through Master Planning and Disposition Efforts.** The City will coordinate with public agencies to facilitate the development of affordable housing projects on vacant and underutilized sites, including sites owned by the County of Orange, the State, and the Irvine Ranch Water District. Activities



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could include collaboration with public agencies on master-planning and disposition efforts for large vacant and underutilized sites. For instance, the County of Orange currently owns significant property near the Irvine Station. Under this program, the City would work with the County to develop affordable housing strategies for these properties.

- **PP-I.3: Leverage All Funding Options.** The City will explore the feasibility of joining the Orange County Housing Finance Trust (OCHFT), a joint power authority composed of many Orange County cities. The OCHFT can provide additional funding options for affordable housing developers. The City will ensure that housing options will include reasonable accommodations and supportive services for people with disabilities.

In summary, while displacement may still potentially occur in the community, the combination of the City's efforts as detailed in the Housing Plan will work to provide a wide range of housing types for using different tools and initiatives. Tools include providing legal assistance to renters (Program PP-J.3), amending the City's existing, successful inclusionary housing requirement from 15 to 20 percent and increasing densities in areas of the City (Program PP-L1), working with the ICLT to facilitate affordable housing development for lower income and special needs households (Program PP-F.2), collaboration with public agencies owning vacant and underutilized sites in the City to undertake master planning efforts a variety of affordable housing developments to meet local housing needs (Program PP-F.4), leveraging funding options for affordable housing to make these projects financially feasible (including joining the Orange County Housing Finance Trust (Program PP- I.3) a density bonuses (Program 2.3), and numerous other programs in the Housing Plan specifically targeted to increase the supply of affordable housing, thereby increasing the housing choice and reducing displacement risk in the community, especially of those within groups facing disproportionate housing needs, including but not limited to those with lower incomes. Lower income groups can also include minority groups, seniors, and persons with disabilities.

These programs and initiatives show that the City is actively working to prevent displacement of its residents by actively procuring methods of assistance, finding different ways to fund and incentivize housing development, and working to create even more opportunities to improve housing choices for persons who are experiencing high-cost burden. Additional programs for housing implementation will also help to develop housing that is more affordable.

### Enforcement and Outreach Capacity

The City complies with existing fair housing laws and regulations. The Irvine Municipal Code prohibits discrimination on the basis of race, color, religion, national origin, sex, age, marital status or physical handicap of any individual in the realms of employment, real estate transactions, and educational institutions. Regarding housing, it prohibits discrimination in financial transactions, advertising, or giving differential treatment and terms. The City also reviews its zoning laws and policies on an ongoing basis to ensure compliance with fair housing

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

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

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

Additionally, the Housing Plan contains program **PP-M.7: Support to City's Fair Housing Services Provider** that involves City staff meeting with the Fair Housing Foundation (described below) that provides fair housing services to its residents and explore ways to provide additional support such as making City facilities available for fundraising events that would raise funds to expand services.

### Fair Housing Foundation

The City of Irvine contracts with the Fair Housing Foundation (FHF), a nonprofit organization dedicated to affirmatively furthering fair housing choice through the provision of education and direct client services. To promote awareness of fair housing laws, FHF implements targeted outreach and education programs for housing consumers including homeowners, prospective homebuyers and tenants as well as housing providers such as sellers, owners, real estate professionals, brokers, landlords and property management firms. Using available data to analyze current discrimination trends, FHF disseminates brochures that promote awareness of specific fair housing issues to ensure that all persons can secure safe and decent housing that they desire and can afford, without regard to their race, color, religion, gender, sexual orientation, national origin, familial status, marital status, disability, ancestry, age, source of income or other characteristics protected by laws. Direct client services range from providing advice concerning general housing issues to performing investigations and advising residents of their rights and remedies under the law in cases where evidence sustains the allegations of discrimination. The FHF's office is in Orange, and its staff can be reached via email or via a phone.

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

### Fair Housing Enforcement

The following section provides an overview of Fair Housing Enforcement in the City during the 5th Cycle period which shows a total of 17 cases that resulted in final findings that sustained the allegations of discrimination over the eight-year period.

FHF counseled and screened 224 City households for potential fair housing violations, Table B-5, Potential Housing Violations by Protected Class in Irvine, shows the breakdown of the 224 potential fair housing violations by protected class. More than 50.0 percent of the complaints received by FHF for potential housing violations were for discrimination based on physical disability. Nearly 20.0 percent were for discrimination based on a mental disability.

The screening process resulted in 40 of the potential violations screened (18.0 percent) with a case opened because information gathered through the screening and counseling phase substantiated possible discrimination. Twenty-one (52.5 percent) of the 40 cases involved allegations of housing discrimination based on physical disability and seven cases involved a mental disability. Table B-6, Cases Opened by Protected Class in Irvine, shows the breakdown of all 40 cases opened by protected class.

**Table B-5. Potential Housing Violations by Protected Class in Irvine**

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

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**Table B-6. Cases Opened by Protected Class in Irvine**

PROTECTED CLASS	NUMBER OF COMPLAINTS	PERCENT OF TOTAL COMPLAINTS
Age	1	3.0 percent
Familial Status	2	5 percent
Mental Disability	7	18 percent
National Origin	2	5 percent
Physical Disability	21	53 percent
Race	5	13 percent
Religion	1	3 percent
Sexual Orientation	1	3 percent
<b>Total</b>	<b>40</b>	<b>100 percent</b>

Of the 40 cases opened, 17 (42.5 percent) resulted in final findings that sustained the allegations of discrimination. Table B-7, Final Findings of Opened Cases in Irvine, shows the breakdown of the 40 cases by final findings.

**Table B-7. Final Findings of Opened Cases in Irvine**

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

During the 5th Cycle period, FHF counseled 2,449 landlord and tenant complaints in the City. Of the 2,449 total complaints, 464 (18.9 percent) were for notices and 335 (13.7 percent) were for habitability. Table B-8, Landlord and Tenant Complaints during 5th Cycle Period in Irvine, shows the breakdown of the types of landlord tenant complaints received.

**Table B-8. Landlord and Tenant Complaints during 5th Cycle Period in Irvine**

COMPLAINT	NUMBER OF COMPLAINTS	PERCENT OF TOTAL COMPLAINTS
Abandonment	6	0.2 percent
Accommodations and Modifications	167	6.8 percent
Commercial Property	0	0.0 percent
Eviction	89	3.6 percent
Foreclosure-Owner	0	0.0 percent
Foreclosure-Tenant	9	0.4 percent
General Issue	132	5.4 percent
Habitability	335	13.7 percent
Harassment	77	3.1 percent
Illegal Entry	33	1.3 percent
Illegal Lockout	0	0.0 percent
Late Fees	14	0.6 percent
Lease Terms	295	12.0 percent
Notices	464	18.9 percent
Nuisance	72	2.9 percent
Other	0	0.0 percent
Parking	1	0.0 percent
Pets	7	0.3 percent
Property for Sale	17	0.7 percent
Refusal to Rent	63	2.6 percent
Refusal to Sell	2	0.1 percent
Relocation	30	1.2 percent
Rent Control	0	0.0 percent
Rent Increase	93	3.8 percent
Retaliation	34	1.4 percent

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COMPLAINT	NUMBER OF COMPLAINTS	PERCENT OF TOTAL COMPLAINTS
Rights & Responsibilities	128	5.2 percent
Section 8 Information	30	1.2 percent
Security Deposit	268	10.9 percent
Unlawful Detainer	66	2.7 percent
Utilities	17	0.7 percent
<b>Total</b>	<b>2449</b>	<b>100 percent</b>

### The fair housing enforcement data does not track where in the City the cases originated. Therefore, the data could not be analyzed for geographic patterns or trends Fair Housing Education

FHF’s education programs include informational booths at community events; overview presentations to community-based organizations, resident associations and government agencies; and more detailed workshops tailored to specific audiences, such as housing consumers or housing providers. Information booths allow FHF staff to distribute brochures and answer questions from interested residents. Presentations to community-based organizations, residents and government agencies involve a 20-40-minute synopsis of FHF’s services and a question-and-answer session.

For housing consumers, FHF offers a detailed two-hour training geared toward tenants that explains fair housing laws, leases, notices, tenant obligations, landlord obligations and specific concerns regarding discrimination topics, including renting to families with children, occupancy standards, and discriminatory rules.

For housing providers, FHF offers three different education programs, including landlord workshops, certificate management training, and training for real estate professionals. Landlord workshops are focused on promoting awareness of federal and state fair housing laws and best management practices for property owners and managers seeking to operate their rental properties in a manner consistent with the law. Topics of discussion include the rental process, tenant selection criteria, rental agreements, and both tenant obligations and landlord obligations in matters such as late fees, security deposits, rent increases, and termination of tenancy.

Certificate management training is a more intensive four-hour session for property owners, managers, management companies, and real estate professionals seeking an in-depth understanding of fair housing laws and practical advice on how to handle common scenarios involving often unknown or misunderstood areas of the law. These areas can include reasonable accommodation for people with disabilities, sexual harassment, arbitrary discrimination, occupancy standards, reasonable regulations of facilities, advertising guidelines, prohibited practices, and hate crimes.

Real estate agent training workshops focus on fair housing laws as they pertain to equal treatment of prospective purchasers in their search for a new home. This workshop provides a

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summary of the fair housing laws, general guidelines, policies and practices, equal treatment needs, advertising requirements and guidelines for showing properties.

## Fair Housing Outreach and Enforcement (Countywide)

### Local Private Fair Housing Outreach and Enforcement

The 2020 Orange County AI identifies that the lack of local private fair housing outreach and enforcement may be a significant contributing factor to fair housing issues in the County. While the County is served by two, high-quality, private, non-profit fair housing organizations—Fair Housing Foundation and the Fair Housing Council of Orange County—the 2020 Orange County AI reports that these organizations are underfunded and understaffed in comparison to the total need for their services and that “victims of discrimination would be more able to exercise their rights, thus deterring future discrimination, if the capacity of existing organizations grew to meet the scale of the problem.”

### Local Public Fair Housing Outreach and Enforcement

The 2020 Orange County AI also identifies that the lack of local public fair housing outreach and enforcement may be a significant contributing factor to fair housing issues in the County. The California Department of Fair Employment and Housing and the department of Housing and Urban development constitute the only public enforcement bodies that operate in the County. The 2020 Orange County AI reports, “advocates across Orange County and the state of California have reported issues with the timeline of the California Department of Fair Employment and Housing’s investigations and the standards that it applies in making probable cause determinations. A local public enforcement agency, if created, would have the potential to be more responsive to victims of discrimination in Orange County than either the state or HUD.”

### Resources for Fair Housing Agencies and Organizations

The 2020 Orange County AI also notes that the lack of resources for fair housing agencies and organizations may be a significant contributing factor to fair housing issues in the County. There are two fair housing organizations in the County that provide services to residents and engage in enforcement, outreach, and education. The 2020 Orange County AI notes that the size of the federal Fair Housing Initiatives Program, “the primary funding program for fair housing organizations, has failed to keep up with inflation, making Congress’s appropriations worth less over time. In order to meet the needs of residents of a large and diverse county, local fair housing agencies and organizations require greater levels of resourcing.”



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#### Department of Fair Employment and Housing

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

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

#### Fair Housing Legal Status

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

#### Housing and Urban Development

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

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

#### Summary of Fair Housing Issues

While the City works to provide fair housing opportunities, fair housing issues continue to exist. Data provided in this section of the Housing Element reflects a limited number of fair housing issues given the population and compared to the County as a whole. The primary fair housing issue in the City is a lack of housing choice related to a lack of affordable housing.

The public outreach conducted as part of the Housing Element (through a survey and two workshops with live polling, question and answer periods and follow up coordination) also confirmed this issue. Aside from the numbers of potential and opened cases, it is important to note that the numbers reflect only the number of discrimination complaints that were reported to FHF and may not reflect the full extent of discrimination. Housing discrimination can go undetected and unreported, and it is common for victims of housing discrimination not to be able to identify, prove,

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or document, the discrimination that occurs. Residents may feel that they could be subject to retaliation by their housing provider if they report discrimination.

Although City residents are provided services and education by FHF, these resources may not be sufficient to resolve all discrimination. The 2020 Orange County AI suggests that fair housing service providers may not be able to meet the existing needs of residents due to insufficient funding. The 2020 Orange County AI reports that a new local public enforcement agency could potentially be more responsive to victims of discrimination in the County than the existing state or federal agencies. However, these factors are outside of the City's control. The City can only continue strengthening its efforts to provide fair housing for its residents based on factors it can control.

## Local Data and Knowledge

### History

The story of Irvine is one of thoughtful planning with decisions made reflecting the input of the community, leading to a nationally recognized, high quality of life. Located in the heart of Orange County, the City combines the friendliness, warmth, and safety of a small town with the educational, employment, recreational, and cultural opportunities of a large city. Incorporated in 1971, the City has grown into a strong and diverse residential and business community. The City has achieved regional importance in part due to its central location within Orange County and attention to balanced planning. The carefully created and executed master plan continues to guide the City's growth four decades after the original concept for the community was born.

As the City has grown, the importance of planning decisions has increased. Thoughtful planning for more than 40 years has earned the City acclaim as one of the nation's best master-planned communities. As a master-planned community, historical planning patterns have been guided by grouping land uses such as office and industrial uses in specific areas near freeways, major thoroughfares and John Wayne Airport, while residential uses are in the "core" of center of the City and outlying areas, with retail centers planned around residential uses. Parks, recreation and open space are also an important part of the master planning effort in Irvine to enhance the health and quality of life of its residents, employees and visitors. This planning effort has clearly been appealing to existing and potential residents as well as employers and developers. Through the years, the Irvine Unified School District is highly ranked and a primary reason many people locate and remain in the City of Irvine. A strong public safety record has also added to the appeal of the community.

These desirables attributes have translated into attracting industries with higher paying jobs and significant increases in home sale prices and rents. This Affirmatively Furthering Fair Housing section of the Housing Element provides a detailed analysis of fair housing issues in the City. As shown in the analysis, the data indicates that **the defining fair housing issue in Irvine is**

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**housing affordability.** In order to address this issue, the City has prioritized programs to encourage, facilitate and preserve affordable housing in community.

The City is and has been very aware of this issue over the years and has taken very proactive steps to address the need for more affordable housing. First, the City was the first in Orange County to adopt an inclusionary housing ordinance in 2003 requiring that 15 percent of all units built in Irvine be affordable to very low-, low- and moderate-income households. Second, the City was among the first in southern California to establish a community land trust for the purpose to creating affordable housing that will be preserved in perpetuity. The Irvine Community Land Trust (ICLT) was formed in 2006 with the mission to provide both rental and ownership housing opportunities with particular focus on the deepest levels of affordability (i.e., very low- and low-income households). To date, the ICLT has built, or is currently developing) over 300 affordable housing units. Third, the City also affirmed its housing vision through the adoption of an Affordable Housing Strategy & Implementation Plan (with two updates), which accommodates “a full spectrum of housing types to meet the shelter needs of all income groups and special needs populations in all stages of life.” This commitment is evidenced by the market and affordable housing opportunities and the initiatives established by the City to provide multiple housing choices for residents. These actions have resulted in the development of over 15,000 affordable housing units in the City during the 5<sup>th</sup> Cycle Housing Element planning period (see Chapter 5), more than nearly every city in the SCAG region except for the City of Los Angeles. The City is committed to increasing its efforts to promote and facilitate affordable housing choices in the community. Chapter 8 of this Housing Element (Housing Plan) details over 20 programs to encourage, preserve, streamline and help fund affordable housing in the City over the 6<sup>th</sup> Cycle planning period.

### Home Purchase Loans

The 2015 Irvine AI analyzed available HMDA loan data for the City and did not identify any actions, omissions, or decisions taken because of, or which have the effect of, restricting housing choices or the availability of housing choices on the basis of age, race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other protected class.

A key aspect of fair housing choice is equal access to financing for the purchase or improvement of a home. In 1977, the Community Reinvestment Act (CRA) was enacted to improve access to credit for all communities, regardless of the race/ethnic or income makeup of its residents. CRA was intended to encourage financial institutions to help meet the credit needs of communities, including low- and moderate-income people and neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance.

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Additionally, the Home Mortgage Disclosure Act (HMDA) requires financial institutions with assets exceeding \$10 million to collect and submit detailed information on the disposition of home loans inclusive of applicant characteristics such as race, ethnicity, and income. HMDA data can then be evaluated to determine if there are any lending patterns indicating that loan approval rates are significantly different for one group versus another. While this evaluation can identify differences in loan application approval rates, the data and the evaluation fall short of establishing bona fide discrimination. Nonetheless, the evaluation of lending outcomes based on HMDA data is helpful in determining where to focus future study as well as present or future homebuyer education and lender training concerning the Fair Housing Act.

The 2015 Irvine AI provided a summary of the lending decisions on 25,766 loan applications by loan type. Of the 25,766 reported loan decisions, 22,810 or 88.5 percent were approved. In the City, the number of applications for conventional home purchase loans surpassed the number of applications for government-backed purchase loans. Approximately 4,347 purchase applications were submitted through conventional loans, while only 540 were submitted for government-backed purchase loans. Approval rates for conventional purchase loans were slightly higher than those for government-backed purchase loans. In Irvine, 90.0 percent of conventional loan applications and 86.0 percent of government-backed purchase loans were approved.

Federal Housing Administration (FHA) insured loans generally offer a down payment as low as 3.5 percent of the purchase price or home value and include the ability to finance some of the closing costs, which are generally lower than conventional loan closing costs. FHA loans are insured by the FHA, meaning that private lenders can file a claim with the FHA in the event of borrower default on an FHA insured loan. Similarly, the United States Veterans Administration (VA) offers VA guaranteed loans that are available to a current member of the U.S. armed forces, a veteran, a reservist or National Guard member, or an eligible surviving spouse through VA-approved lenders. VA mortgage loans can be guaranteed with no money down and there is no private mortgage insurance requirement. Like FHA loans, the lender is protected against loss if the borrower fails to repay the loan. FHA and VA loans provide access to credit for borrowers that may not have a sufficient down payment or credit history to qualify for conventional loans, which generally require a minimum down payment or equity stake in the property of 5 percent. Since there is no government insurance on conventional loans, so these loans pose a higher risk to the financial institution and thus generally have more stringent credit, income and asset requirements.

The 2015 Irvine AI used 2012 HMDA data for the City and analyzed trends for the different loan types. Of the three loan types, conventional home purchase, conventional home improvement and conventional refinance loans had the highest number of loan applications for each loan type and also had higher than average approval rates, with 89.9 percent of conventional home purchase loans, 89.0 percent of conventional home improvement loans and 88.4 percent of conventional

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refinance loans approved. Conventional refinancing loan applications accounted for over three-quarters of all loan applications in this dataset and carried an approval rate of 88.4 percent.

### Home Improvement Loans

Reinvestment in the form of home improvement is critical to maintaining the supply of safe and adequate housing. Historically, home improvement loan applications have a higher rate of denial when compared to home purchase loans. Part of the reason is that an applicant's debt-to-income ratio may exceed underwriting guidelines when the first mortgage is considered with consumer credit balances. Another reason is that many lenders use the home improvement category to report both second mortgages and equity-based lines of credit, even if the applicant's intent is to do something other than improve the home (e.g., pay for a wedding or college). Loans that will not be used to improve the home are viewed less favorably since the owner is divesting in the property by withdrawing accumulated wealth. From a lender's point of view, the reduction in owner's equity represents a higher risk. In 2012, 393 applications for home improvement loans were received in Irvine. Approximately 86.5 percent of applications from Irvine were approved.

### Refinancing

Homebuyers will often refinance existing home loans for several reasons. Refinancing can allow homebuyers to take advantage of better interest rates, consolidate multiple debts into one loan, reduce monthly payments, alter risk (i.e., by switching from variable rate to fixed rate loans), or free up cash and capital. A substantial proportion of loan applications submitted in the City in 2012 were for refinancing existing home loans (20,486 applications) with an 88.0 percent approval rate.

### Mortgage Financing Comparison (2012 to 2020)

Overall, 159 households applied for government-backed mortgage loans, and 5,517 households applied for conventional home mortgage loans in Irvine in 2020 (see Table B-9, Disposition of Home Purchase and Improvement Loan Applications (2020), below). Of the applications for conventional purchase loans, 70.0 percent were approved, 8.0 percent were denied, and 22.0 percent were withdrawn or closed for incompleteness. In 2012, there were more applications for government-backed home purchase loans than in 2020. The 2020 approval rate for government-backed home purchase loans and conventional mortgage loans is also lower than the approval rates in 2012 (Table B-10, Disposition of Home Purchase and Improvement Loan Applications (2012), below). More than half (67.0 percent) of refinance applications were approved in 2020, lower than the approval rate of 88.0 percent in 2012. The denial rate in 2020 was greatest for home improvement loans (34.0 percent), while 2012 saw a lower denial rate (13.0 percent).

It is important to note that the Dodd-Frank: Title XIV - Mortgage Reform and Anti-Predatory Lending Act lending practices were significantly overhauled and restricted after the Great Recession to prevent predatory loan practices and avoid future devastating financial downturns.



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This Act established minimum standards for home mortgages and increased requirements for loan approval.

**Table B-9. Disposition of Home Purchase and Improvement Loan Applications (2020)**

	Loan Type							
	Government-Backed Purchase		Conventional Purchase		Refinance		Home Improvement	
Approved <sup>1</sup>	109	69%	3869	70%	14858	67%	366	50%
Applications Denied	14	9%	448	8%	1931	9%	249	34%
Other <sup>2</sup>	36	23%	1200	22%	5331	24%	122	17%
<b>Total Applicants</b>	<b>159</b>	<b>100%</b>	<b>5517</b>	<b>100%</b>	<b>22120</b>	<b>100%</b>	<b>737</b>	<b>100%</b>
<sup>1</sup> Includes those applications approved by the lenders but not accepted by the applicants.								
<sup>2</sup> Includes files closed for incompleteness, and applications withdrawn.								

Source: FFIEC MSA/MD 2020 Aggregate Report for Anaheim/Santa Ana/Irvine by Census Tract

**Table B-10. Disposition of Home Purchase and Improvement Loan Applications (2012)**

	Loan Type							
	Government-Backed Purchase		Conventional Purchase		Refinance		Home Improvement	
Approved <sup>1</sup>	465	86%	3907	90%	18098	88%	710	87%
Applications Denied	75	14%	440	10%	2388	12%	104	13%
<b>Total Applicants<sup>2</sup></b>	<b>540</b>	<b>100%</b>	<b>4347</b>	<b>100%</b>	<b>20486</b>	<b>100%</b>	<b>814</b>	<b>100.00%</b>
<sup>1</sup> Includes those applications approved by the lenders but not accepted by the applicants.								
<sup>2</sup> Includes files closed for incompleteness, and applications withdrawn.								

Source: 2012 HMDA Database

## Lending Patterns by Race/Ethnicity and Income Level (2012)

Lending patterns in the City indicate a high approval rating amongst several race/ethnic groups. In the 2015 Irvine AI, the City analyzed the relation between lending outcomes and race or ethnicity. Table B-11, Home Loan Approval Rates by Applicant Characteristics, on the following page shows the loan approval rates for the 4,887 home purchase loan applications, 393 home improvement loan applications and 20,486 refinance loan applications made for properties in the City in 2012 where HMDA data is available. This examination of lending activity focuses on potential discrimination in lending decisions that could prevent an individual or family from securing loan approval based on race or ethnicity. Table B-11 breaks the loan applications into income level categories first, then examines approval rates based on race or ethnicity for each loan type to determine if there are significant differences between the loan type and income category approval rate and the approval rate for each race or ethnicity group within that category.

For example, there were 819 home purchase applications received from individuals or families with incomes between 80-120 percent of AMI. Of the 819 loan applications in that income group, the approval rate was 89.0 percent. with most home purchase loan applicants with incomes between 80-120 percent of AMI described themselves as 43.5 percent of applicants in this income category described themselves as Asian with an approval rate of 90.2 percent, 28.2 percent described themselves as White with an approval rate of 87.0 percent, and 2.2 percent described



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themselves as Hispanic with an approval rate of 83.0 percent. 25.5 percent of applicants or Declined to State their race or ethnicity. Applicants in this category had an overall approval rate of 89.5 percent. These approval rates are comparable to the 89.0 percent approval rate for the loan type/income category in the sense that none are more than 10.0 percent lower than the approval rate for the loan type/income category. Further, the lowest approval rate in the category was the 83.3 percent approval rate on home purchase loans received from Hispanics with incomes between 80 and 120 percent of AMI. These loans represent a relatively small portion of the loans made in this loan type/income category.

**Table B-11. Home Loan Approval Rates by Applicant Characteristics**

Type	Low/Mod Income <80 percent MDI		Middle Income 80-120 percent MFI		Upper Income 120+ MFI	
	Loan Applications	Approval Rate	Loan Applications	Approval Rate	Loan Applications	Approval Rate
<b>Home Purchase</b>	<b>816</b>	<b>83.1 percent</b>	<b>819</b>	<b>89.0 percent</b>	<b>3,252</b>	<b>91.2 percent</b>
Hispanic	22	77.3 percent	18	83.3 percent	61	88.5 percent
White	245	80.8 percent	231	87.0 percent	1,141	91.8 percent
Asian	327	82.3 percent	356	90.2 percent	1,442	90.4 percent
African American	2	50.0 percent	3	100.0 percent	16	100.0 percent
All Others	0	-	2	100.0 percent	1	100.0 percent
Decline or N/A	220	87.7 percent	209	89.5 percent	591	91.9 percent
<b>Home Improvement</b>	<b>93</b>	<b>71.0 percent</b>	<b>56</b>	<b>94.6 percent</b>	<b>244</b>	<b>90.6 percent</b>
Hispanic	4	100.0 percent	1	1.0 percent	5	1.0 percent
White	40	82.5 percent	33	97.0 percent	118	90.7 percent
Asian	22	72.7 percent	12	1.0 percent	72	91.7 percent
African American	1	-	0	-	1	100.0 percent
All Others	0	-	0	-	1	-
Decline or N/A	26	50.0 percent	10	80.0 percent	47	89.4 percent
<b>Home Refinance</b>	<b>3,407</b>	<b>81.7 percent</b>	<b>3,445</b>	<b>87.8 percent</b>	<b>13,634</b>	<b>90.1 percent</b>
Hispanic	117	74.4 percent	82	81.7 percent	225	86.2 percent
White	1,432	81.1 percent	1,294	88.6 percent	5,466	89.4 percent
Asian	909	81.6 percent	1,076	85.7 percent	4,890	90.8 percent
African American	17	76.5 percent	14	71.4 percent	44	79.5 percent
All Others	7	71.4 percent	7	85.7 percent	23	73.9 percent
Decline or N/A	925	83.6 percent	972	90.0 percent	2,986	90.8 percent

Source: HMDA Database 2012

## Predatory Lending

Predatory lending involves abusive loan practices usually targeting minority homeowners or those with less-than-perfect credit histories. The predatory practices include high fees, hidden costs, unnecessary insurance, and larger repayments due in later years. A common predatory practice is directing borrowers into more expensive and higher fee loans in the “subprime” market, even though they may be eligible for a loan in the “prime” market. Predatory lending is prohibited by several state and federal laws.

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The Fair Housing Act of 1968 requires equal treatment in terms and conditions of housing opportunity and credit regardless of race, religion, color, national origin, family status, or disability. The Equal Credit Opportunity Act of 1972 also requires equal treatment in loan terms and availability of credit for all the above protected classes, as well as age, sex, and marital status. Lenders would be in violation of these acts, if they target minority or elderly households to buy higher priced loan products, treat loans for protected classes differently, or have policies or practices that have a disproportionate effect on the protected classes.

In addition, the Truth in Lending Act (TILA) requires lenders to inform the borrower about payment schedules, loan payments, prepayment penalties, and the total cost of credit. In 1994, Congress amended TILA and adopted the Home Ownership and Equity Protection Act (HOEPA). HOEPA requires that lenders offering high-cost mortgage loans disclose information if the annual percentage rate (APR) is ten points above the prime or if fees are above eight percent of the loan amount. HOEPA also prohibits balloon payments for short-term loans and, for longer covered loans, requires a warning if the lender has a lien on the borrower's home and the borrower could lose the home if they default on the loan payment.

Following North Carolina's lead, in September 2001, California became the second state to pass a law banning predatory lending. Codified as AB489 and amended by AB344, the law enables state regulators and the Attorney General to attempt to prevent "predatory" lending practices by authorizing the state to enforce and levy penalties against lenders that do not comply with the provisions of this bill. The law provides protections against predatory lending to consumers across the state with respect to financing of credit insurance, high loan and points, steering and flipping, balloon payments, prepayment penalties, call provisions, interest rate changes upon default, or encouragement to default when a conflict of interest exists.

### **Subprime Lending**

According to the Federal Reserve, "prime" mortgages are offered to persons with excellent credit and employment history and income adequate to support the loan amount. "Subprime" loans are loans to borrowers who have less-than-perfect credit history, poor employment history, or other factors such as limited income. By providing loans to those who do not meet the critical standards for borrowers in the prime market, subprime lending can and does serve a critical role in increasing levels of homeownership. Households that are interested in buying a home, but have blemishes in their credit record, insufficient credit history, or non-traditional income sources, may be otherwise unable to purchase a home. The subprime loan market offers these borrowers opportunities to obtain loans that they would be unable to realize in the prime loan market.

Subprime lenders generally offer interest rates that are higher than those in the prime market and often lack the regulatory oversight required for prime lenders because they are not owned by regulated financial institutions. In the recent past, however, many large and well-known banks became involved in the subprime market either through acquisitions of other firms or by initiating subprime loans directly.

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Though the subprime market usually follows the same guiding principles as the prime market, a number of specific risk factors are associated with this market. According to a joint HUD/Department of the Treasury report, subprime lending generally has the following characteristics:

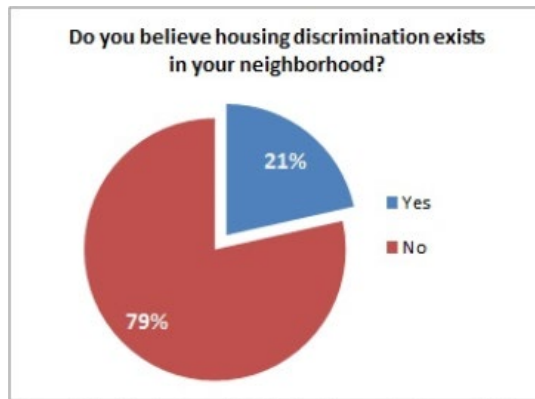
- **Higher Risk:** Lenders experience higher loan defaults and losses by subprime borrowers than by prime borrowers.
- **Lower Loan Amounts:** On average, loans in the subprime mortgage market are smaller than loans in the prime market.
- **Higher Costs to Originate:** Subprime loans may be more costly to originate than prime loans since they often require additional review of credit history, a higher rate of rejected or withdrawn applications and fixed costs such as appraisals, that represent a higher percentage of a smaller loan.
- **Faster Prepayments:** Subprime mortgages tend to be prepaid at a much faster rate than prime mortgages.
- **Higher Fees:** Subprime loans tend to have significantly higher fees due to the factors listed above.

Subprime lending can both impede and extend fair housing choice. On the one hand, subprime loans extend credit to borrowers who potentially could not otherwise finance housing. The increased access to credit by previously underserved consumers and communities contributed to record high levels of homeownership among minorities and lower income groups. On the other hand, these loans left many lower income and minority borrowers exposed to default and foreclosure risk. Since foreclosures destabilize neighborhoods and subprime borrowers are often from lower-income and minority areas, mounting evidence suggests that classes protected by fair housing faced the brunt of the recent subprime and mortgage lending market collapse.

### Community Perspectives on Fair Housing Discrimination

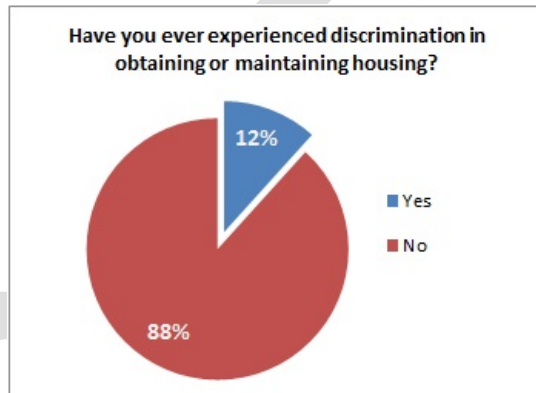
To gather additional perspectives on fair housing choice, the City asked residents responding to the 2015-2019 Consolidated Plan Community Survey a series of questions about their personal experience with housing discrimination and whether housing discrimination exists in the City. The results of the survey reveal that 79.0 percent of the 121 people responding to the fair housing questions do not believe housing discrimination exists in their own neighborhood (Figure B-1, Survey of Households – Housing Discrimination). Only 14 out of 121 residents or 12.0 percent indicated that they have experienced discrimination in obtaining or maintaining housing (Figure B-2, Survey of Households Experiencing Housing Discrimination).

Figure B-1. Survey of Households – Housing Discrimination



Source: City of Irvine Consolidated Plan Community Survey, 2014.

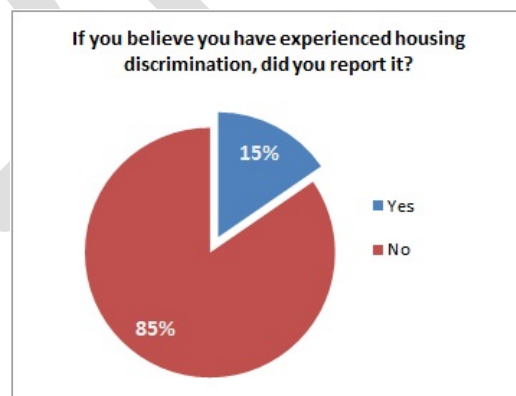
Figure B-2. Survey of Households Experiencing Housing Discrimination



Source: City of Irvine Consolidated Plan Community Survey, 2014.

Of the 14 respondents who believe they have experienced housing discrimination in the process of obtaining or maintaining housing, 12 did not report the perceived discriminatory act or acts (Figure B-3, Survey of Households Reporting Housing Discrimination).

Figure B-3. Survey of Households Reporting Housing Discrimination



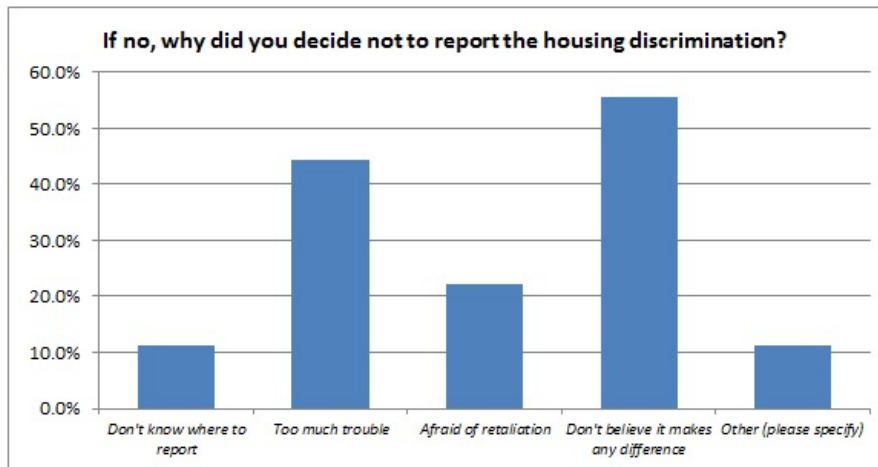
Source: City of Irvine Consolidated Plan Community Survey, 2014.

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Of the 12 people who did not report the perceived discrimination to FHF or another competent authority, most respondents shown in Figure B-4, Reasons for Not Reporting Housing Discrimination, did not believe it would make any difference or that it would be too much trouble. Other respondents were afraid of retaliation or did not know where to report the discrimination.

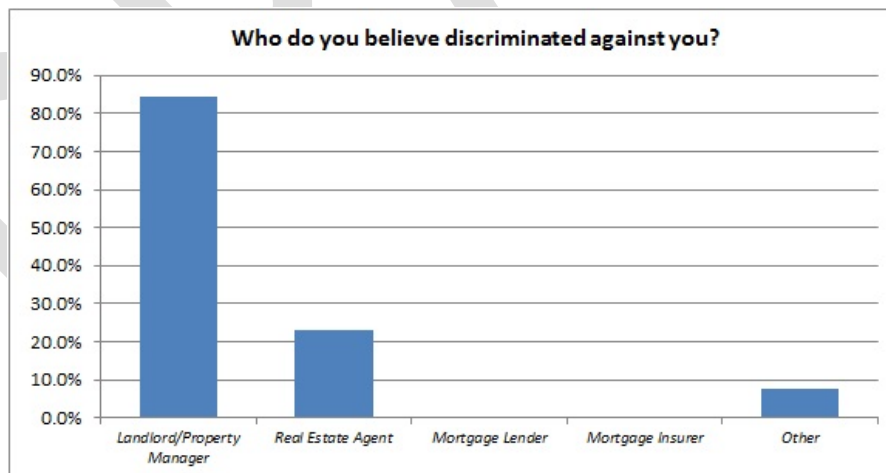
**Figure B-4. Reasons for Not Reporting Housing Discrimination**



Source: City of Irvine Consolidated Plan Community Survey, 2014.

As shown in Figure B-5, Survey of Households – Actors Responsible for Housing Discrimination, most of the residents who believed they were discriminated against attributed the discriminatory act or acts to a landlord or property manager.

**Figure B-5. Survey of Households – Actors Responsible for Housing Discrimination**



Source: City of Irvine Consolidated Plan Community Survey, 2014.

Table B-12, Basis of Discrimination for Survey Respondents, shows how the 14 residents who believed they were discriminated against categorized the act or acts of discrimination. Residents were able to select more than one basis of discrimination.

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Table B-12. Basis of Discrimination for Survey Respondents

Basis of Discrimination	Total
Age	3
Color	1
Developmental Disability	0
Mental Disability	0
Physical Disability	1
Familial Status	3
Gender	2
National Origin	2
Race	5
Religion	2
Source of Income	1

Source: 2015 - 2019 Consolidated Plan  
Community Survey, 2014

## Real Estate Advertising

### Owner-Occupied

The first step in buying a home is generally searching for available housing through advertisements that appear in magazines, newspapers, or on the Internet. Advertising is a sensitive issue in the real estate and rental housing market because advertisements can advertently or inadvertently signal preferences for certain buyers or tenants. Recent litigation has held publishers, newspapers, the Multiple Listing Service (MLS), real estate agents, and brokers accountable for discriminatory ads.

Advertising can suggest a preferred buyer or tenant in several ways. Examples include advertisements or listings that:

- **Suggest a preferred type of buyer or tenant household;**
- **Use models that indicate a preference or exclusion of a type of resident;**
- **Publish advertisements or listings in certain languages; or**
- **Restrict publication to certain types of media or locations indicating a preference.**

Generally, advertisements cannot include discriminatory references that describe current or potential residents, the neighbors or the neighborhood in racial or ethnic terms, or terms suggesting preferences for one group over another (e.g., adults preferred, ideal for married couples with kids, or conveniently located near Catholic church).



## Rental Housing

While the process of renting an apartment or home may be less expensive and burdensome initially than the home-buying process, it may be just as time-consuming and potential renters may face discrimination during various stages of the rental process. Some of the more prevalent forms of discriminatory treatment are discussed in the sections below.

The main sources of information on rentals are newspaper advertisements, word of mouth, signs, apartment guides, the Internet, and apartment brokers. Litigation has held publishers, newspapers, and others accountable for discriminatory ads. While advertisements cannot include discriminatory references that describe current or potential residents, the neighbors or the neighborhood in racial or ethnic terms, or other terms suggesting preferences (e.g., adults preferred, ideal for married couples with kids, or conveniently located near a Catholic church), the content of the advertisement can suggest a preferred tenant by suggesting preferred residents, using models, publishing in certain languages, or restricting media or locations for advertising.

## Accessibility of Public Facilities

The City analyzed the public services and facilities available to Irvine residents in the 2015 Irvine AI. Some of the key facilities and services are identified in Table B-13, Public Services and Facilities.

The 2020 Orange County AI did not identify inaccessible public or private infrastructure as a significant contributing factor to fair housing issues in the County. The analysis did not reveal examples of infrastructure that is inaccessible.

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**Table B-13. Public Services and Facilities**

Public Facility	Location
City Hall	1 Civic Center Plaza
Bommer Canyon	11 Bommer Canyon Road
Colonel Bill Barber Marine Corps	4 Civic Center Plaza
Cypress Community Park	255 Visions
David Sills Lower Peters Canyon Park	3901 Farwell
Deerfield Community Park	55 Deerwood West
Harvard Community Park	14701 Harvard Avenue
Harvard SK8 Park	14701 Harvard Avenue
Heritage Park Community Park	14301 Yale Avenue
Hicks Canyon Community Park	3864 Viewpark
Irvine Fine Arts Center	14321 Yale Avenue
Lakeview Senior Center	20 Lake Road
Las Lomas Community Park	10 Federation Way
Lower Peters Canyon Community Park	3901 Farwell Avenue
Mark Daily Athletic Field	308 W. Yale Loop
Northwood Community Park	4531 Bryan Avenue
Oak Creek Community Park	15616 Valley Oak
Quail Hill Community Park	35 Shady Canyon Drive
Rancho Senior Center	3 Ethel Coplen Way
Turtle Rock Community Park	1 Sunnyhill Drive
Turtle Rock Nature Center	1 Sunnyhill Drive
University Community Park	1 Beech Tree Lane
William Woollett Jr. Aquatics Center	4601 Walnut Avenue
Windrow Community Park	285 E. Yale Loop
Woodbridge Community Park	20 Lake Road
Woodbury Community Park	130 Sanctuary
Animal Care Center	6443 Oak Canyon
County of Orange: Irvine Heritage Park	14361 Yale Avenue
Orange County Public Library - University Park	4512 Sandburg Way
Katie Wheeler Library	13109 Old Myford Road

Source: City of Irvine, 2015

## Other Relevant Factors

Other contributions that affect the accumulation of wealth and access to resources include historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing. As documented in this Housing Element, Irvine is a relatively young master-planned community that has historically made significant investments in infrastructure and affordable housing. Additionally, the Housing Plan includes programs to assist lower income homeowners for residential rehabilitation,

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preserve at-risk affordable housing units with expiring affordability covenants during the 6th Cycle time period and to ensure the furthering of affirmatively fair housing.

## Historical Governmental and Nongovernmental Land Use Zoning and Investment Practices (e.g., Infrastructure) in Irvine

The City is divided into distinct neighborhoods called planning areas, with each planning area having its own character. Through creative planning, each neighborhood is unified to create a sense of community identity. Residential growth has been concentrated within the central portions of the City. Each planning area has a unique theme, which provides a sense of identity through its design and connection with surrounding retail and other amenities. Existing neighborhoods includes conveniently located retail, office, and public facilities to support residential development. The convenient location of community facilities, in relation to the residential areas, promotes their viability and vitality.

Employment growth has been concentrated adjacent to regional transportation facilities (i.e., airport, freeways, and train station) on the western and eastern edges of the City. Both the residential and employment populations have experienced a tremendous amount of growth and change since incorporation in 1971. Land use policies have been developed to help shape the community's growing diverse population and to continue providing high quality amenities and infrastructure to make Irvine a safe and exciting place to live.

Irvine has evolved and matured over the 50 years since incorporation. When Irvine was incorporated in 1971, it had a population of 20,156. In 2020, the City had a population of nearly 300,000. Redevelopment of commercial properties began approximately 20 years ago with large corporate campuses like Parker Hannifin and Fluor Corporation transforming from rolling lawns and expansive parking areas to higher density housing units, supporting retail uses and parking structures. The Irvine Business Complex, near John Wayne Airport, was originally developed as the planned corporate, office and industrial area in the City that has since come to include over 15,000 residential uses through the redevelopment of private property owners as housing demand increased.

The University of California, Irvine and the highly ranked Irvine Unified School District, as well as the robust employment opportunities, have attracted individuals and families from a variety of ethnic and racial backgrounds.

Infrastructure in the City has primarily been funded through development impact fees, State and federal funds, and community facilities districts and other tax districts. Because Irvine is a master planned community, infrastructure for villages or planning areas are planned prior to development taking place so that sufficient infrastructure exists for planned development.

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## The Great Recession and Redevelopment Dissolution

As with other cities across the country, housing development slowed significantly starting in 2008-09 with the Great Recession. Housing types developed in the City also shifted as more multi-family units to adapt the housing market changes caused by the Recession.

In 1993, under the authority of the Defense Base Closure and Realignment Act of 1990, it was announced that the 4,700-acre Marine Corps Air Station (MCAS) El Toro would be closed and operational closure of the MCAS occurred in July 1999. The City adopted a Redevelopment Project utilizing a California Health and Safety Code section specific to base closure redevelopment projects in 2004. This project was only active for a few years before the Great Recession and the redevelopment of the base required significant infrastructure improvements and removal of structures and facilities to transform the property into the Great Park community. In 2011, when economic recovery in the country was just beginning to occur, Redevelopment was eliminated by State law in response to the State's budget crisis. This had a significant impact on Irvine's Redevelopment Project, as not enough time or development had occurred to generate sufficient revenue for redevelopment efforts.

It is important to note that the Redevelopment Project was expected to generate \$500 million in required low- and moderate-income housing set aside revenues over a 50-year time period. The City prepared and adopted the Affordable Housing Strategy and Implementation Plan that provided a plan on how this \$500 million would be spent on affordable housing in the City in 2006. This Plan projected that thousands of lower income units would be developed throughout the City as sufficient local financial resources were anticipated. Redevelopment dissolution removed this \$500 million funding source for affordable housing and left the City with almost no local resources or funding to provide affordable housing to the community.

The City does have an inclusionary housing ordinance (the first city in Orange County to enact one) and affordable units have been created since Redevelopment Dissolution due to this requirement. Additionally, the City has entered into development agreements with property owners that include the provision of affordable housing when market rate units are entitled and developed.

## Occupancy Codes and Restrictions (Countywide)

The 2020 Orange County AI identified that occupancy codes and restrictions may be a significant contributing factor to fair housing issues in the County. The analysis illustrated this, "substantial recent history of municipal ordinances targeting group homes, in general, and community residences for people in recovery from alcohol or substance abuse disorders. In 2015, the City of Newport Beach entered into a \$5.25 million settlement of a challenge to its ordinance, but that settlement did not include injunctive relief calling for a repeal of that ordinance. Group home operators have also challenged the City of Costa Mesa's ordinance, though a jury found in the City's favor. Following the jury's verdict in that case, there were

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reports that Orange County was considering similar restrictions for its unincorporated areas. Although municipalities have an interest in protecting the health and safety of group home residents, these types of restrictions may be burdensome for ethical, high-quality group home operators. Occupancy codes and restrictions are not as high priority of a barrier as the factors that hinder the development of permanent supportive housing, as group homes are generally less integrated than independent living settings.”

### Sites Inventory

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

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

Figures B-26 through B-41 (located at the end of this appendix), Sites Inventory Map, illustrates the location of the sites throughout the City, which are detailed in the Sites Inventory. Affordability assumptions are made to balance locating lower-income sites in areas that are already zoned for higher-density residential development and in areas with access to resources:

- **Improved Conditions:** The sites are intentionally located throughout the City by implementing a program to update the City’s Land Use Element and Zoning Ordinance (which will include residential overlays in existing commercial areas) to encourage diverse neighborhoods and to provide the best amenities that the City has to offer, particularly for lower-income households. “Amenities” in this context refers to access to employment centers, commercial areas, schools, transit, parks, and public services.
- **Exacerbated Conditions:** Some sites are in areas of greater minority and/or poverty concentration as sites are located throughout the City. Lower-income sites in Planning Area 23 are in an area with a very high concentration of Asian residents. Planning Area 36, which contains sites for units at all income levels, is in a Low Resource area as identified by the 2021 TCAC/HCD Opportunity Areas Map. Pursuant to State law and HCD guidance, the City has identified lower-income sites in areas where the existing zoning allows for higher-density development (per the HCD guidelines). However, the City mitigates the impact of this concentration by identifying lower-income sites in other areas of the City, including Planning Areas 4 and 51.

Table B-14, Impacts on Patterns of Disproportionate Housing Needs, provides a summary of the analysis that includes the number of units per site by income group for each of the AFFH

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categories relative to the impacts on patterns of disproportionate housing needs. The table analyzes the following categories:

- **Overpayment/Cost Burden:** The analysis evaluates the number of units in the Sites Inventory that are in areas where the majority (more than 50 percent) of households experience housing cost burden. The analysis differentiates between ownership cost burden and rent burden.
- **White Concentration:** Number of units in the Sites Inventory in areas with a White concentration (i.e., the White percentage of the population exceeds the County average).
- **Asian Concentration:** Number of units in the Sites Inventory in areas with an Asian concentration (i.e., the Asian percentage of the population exceeds the County average).
- **Overcrowding:** Number of units in areas where the rates of overcrowding and/or severe overcrowding exceed the County average.
- **Areas of Affluence:** Number of units in areas of affluence.
- **R/ECAP:** Number of units in Racially/Ethnically Concentrated Areas of Poverty (R/ECAP).
- **Displacement:** Number of units in areas where there is a risk of displacement.

The City is adding housing based on the need in each of the categories. Table B-14 shows that 46.0 percent of all the units from the Sites Inventory are in areas where over 50 percent of homeowners are cost burdened. In comparison, 21.0 percent of units are in areas where over 50 percent of renter households are rent burdened.

Another way to measure the relative cost or rent burden is by comparison to the countywide average. Of the City's 121 census tract block groups, 47 have a greater share of households with a cost burden than the County average (28.0 percent) and 37 block groups have a greater share of households with a rent burden than the County average (55.0 percent). To help address the cost and rent burdens, 10,226 lower-income housing units in the site inventory (76.0 percent of all lower-income housing units in the Sites Inventory) are in the block groups with either a higher cost burden share or a higher rent burden share.

Approximately 23.0 percent of units are in areas with a White concentration and the same percentage are in areas with an Asian concentration. A higher number of lower-income units (42.0 percent) are in Asian concentration than in White concentration areas (11.0 percent). In contrast, more moderate and above-moderate units (26.0 percent) are in areas with a White concentration than areas with an Asian concentration (17.0 percent). This contrast is not a concern because of the relative wealth of the City's Asian community.

There are 17,289 units in the Sites Inventory (28.0 percent of all units) located in areas experiencing overcrowding, which will help provide additional housing units to alleviate



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overcrowding in these areas. Almost 34.0 percent of the lower-income units in the Sites Inventory are in areas with overcrowding.

Approximately 2.0 percent of the total sites are in areas of affluence. This is due primarily to the fact that affluent areas are mostly built out, with few sites for potential new development. Less than 2.0 percent of units are in R/ECAP areas, which shows the City has distributed the units in the Sites Inventory in a way that will not concentrate affordable housing in these areas. No units are located in areas designated as susceptible to displacement because there are no census tracts in the City identified as susceptible to displacement.

**Table B-14. Impacts on Patterns of Disproportionate Housing Needs**

Site Inventory Units	Total Units	Overpayment		White	Asian	Over-crowding	Areas of Affluence	R/ECAP	Dis-placement
		Owner Cost Burden	Rent Burden						
Lower	13,376	6,655	2,162	1,496	5,635	4,524	3	495	-
Moderate	4,934	1,996	1,392	1,289	770	1,209	109	43	-
Above Moderate	43,829	20,043	9,582	11,579	7,720	11,556	984	385	-
<b>Total</b>	<b>62,139</b>	<b>28,694</b>	<b>13,136</b>	<b>14,364</b>	<b>14,125</b>	<b>17,289</b>	<b>1,096</b>	<b>923</b>	<b>-</b>

## Integration and Segregation: Race and Income

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

- 89.0 percent of lower-income units are in (overall) minority concentration areas compared to 74.0 percent of moderate- and above-moderate-income units.
- 42.0 percent of lower-income units are in Asian concentration areas compared to 17.0 percent of moderate- and above-moderate-income units.
- 12.0 percent of lower-income units are in African American concentration areas compared to 11.0 percent of moderate- and above-moderate-income units.
- 59.0 percent of lower-income units are in Hispanic concentration areas compared to 77.0 percent of moderate- and above-moderate-income units.
- 11.0 percent of lower-income units are in White concentration areas compared to 26.0 percent of moderate and above moderate-income units. It should be noted that more than a third of the moderate and above-moderate units in White concentration areas are on site numbers 23 and 24. These sites would likely be developed with high-density apartments, which could attract a wide diversity of residents.

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- 7.0 percent of lower-income units are in poverty concentration areas compared to 5.0 percent of moderate- and above-moderate-income units.

0.0 percent of lower-income units are in census tracts with median income in the top quartile Citywide compared to 2.0 percent of moderate and above moderate-income units. It should be noted that the small number of units located in census tracts with median income in the top quartile Citywide reflect that these high-income areas are mostly built out, with limited or no opportunity for additional residential development. Planning Areas 36 and 51, where most current high-density-zoned sites are located, are not among the City's poverty concentration areas. These areas are still appropriate locations for lower-income housing due to their high-density zoning and proximity to jobs, transit, schools, and public services.

### Racially Concentrated Areas of Affluence

There are no sites in areas of concentrated Asian affluence and only one site (Site 50 in PA 35) in an area of concentrated White affluence. This is since these areas of affluence are fully built out. The site inventory does include sites adjacent to both areas of concentrated Asian affluence and areas of concentrated White affluence, which will generally provide the residents of new housing units built on those sites, at all income levels, with access to the same amenities and services available to current residents in affluent areas. Racially/Ethnically Concentrated Areas of Poverty

The R/ECAPs in the City contain less than 2.0 percent of the sites, all of which are located near the University of California, Irvine. This shows that the City has distributed the units in the Sites Inventory in a way that will not concentrate affordable housing in these areas.

### Access to Opportunity

Figure B6 shows housing sites identified in the Sites Inventory in relation to resource areas defined by the 2021 TCAC/HCD Opportunity Areas Map. The sites currently identified to accommodate the lower-income housing need are in areas throughout the City (in compliance with State law), including currently nonresidential zoned areas that the City has identified for rezoning.

Per the 2021 TCAC/HCD Opportunity Areas Map, the City mostly consists of moderate, high, and highest resource areas. There are two low resource areas located in and around John Wayne Airport and at the southern end of the City. There is also a large area (Planning Area 51) designated as "Missing/Insufficient Data." Planning Area 51 consists largely of newly constructed residential developments (Great Park Neighborhoods), highly rated public schools, and a large public park (The Great Park). Furthermore, Planning Area 51 is near multiple regional and neighborhood commercial centers as well as a transit station. Therefore, housing built in the Planning Area is expected to have more than adequate access to resources despite the Opportunity Areas Map designation.

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#### Lower Income Units

Of the total lower income units in the Site Inventory, 40.0 percent are in moderate to highest resource areas, while only 13.0 percent of lower income units are in low resource areas. While 47.0 percent of lower income units are in areas with missing/insufficient data, it is important to note that all these units are in Planning Area 51, which contains a number of parks **including the Orange County Great Park, Beacon Park, Portola Springs Community Park and Valley Vista Park**, Irvine station, and highly rated public schools **(including Stonegate, Woodbury and Northwood Elementary Schools and Northwood High School)**. The Planning Area is also near multiple regional and neighborhood commercial centers including the Irvine Spectrum, Woodbury and Cypress Village shopping centers. Despite the Opportunity Area designation, residents in this Planning Area will have ample access to resources.

Figure B-42 provides a map of sites with lower income units only to illustrate that the sites are located in many different parts of the City. Additionally, fair housing overlays are provided. There are two sites located in area shown with a racial or ethnic concentration of poverty. This area encompasses the University of California, Irvine which is recognized as one of the most racially and ethnically diverse universities in the State. Because of the high concentration of students, and the fact that over 97 percent these students are full-time students, incomes are generally lower as a large portion of full-time students do not also have full time jobs. Therefore, earnings, wages and incomes will generally be lower in census tracts that encompass major universities with such high percentages of full-time students. **The targeted placement of affordable housing in this area will provide more housing choices to university students struggling with cost burden and overpayment given their incomes.**

Figure B-42 also shows a census tract in southeast Irvine that is designated as a disadvantaged community (DAC) according to CalEnviroScreen. It is important to note that this census tract includes portions of the City of Irvine and the City of Lake Forest. The City has identified two opportunity sites for affordable housing located in this area and while the sites are located within the CalEnviroScreen DAC, the sites are also located in a high opportunity area. The sites are directly across the street from the City of Hope medical center, within walking distance of several technological job centers in Irvine, and is close proximity to the Orange County Great Park, the Irvine Transportation Center, the Irvine Spectrum, and the Los Olivos retail center. **The targeted placement of affordable housing in this area will provide more housing choices for individuals and families struggling with cost burden and overpayment given their incomes.** The two opportunity sites located within the identified DAC are sited on land that is currently utilized as farmland, which may contribute to CalEnviroScreen identifying the area as one with a high concentration of pesticides. During the operation of the El Toro Marine Corp Air Station, this site was designated as the approach and departure zone for aviation operations. The DAC identified census tract is bordered by the Interstate 5 and 405 connection known as the El Toro “Y” and

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bisected by several major arterials that serve as feeders to the I-5/I-405 corridor that may contribute to the tract's overall high pollution burden and traffic identified in CalEnviroScreen. The two opportunity sites are located further away from the I-5/I-405 corridor and may not have the same level of pollution as other parcels. The housing burden designation, which influences the overall DAC qualification is most likely due in part to the Forest Gardens Senior Living Mobile Home Community located in the City of Lake Forest, as currently there is no existing residential in the census tract within the City of Irvine.

It is important to note that much of the data CalEnviroScreen utilizes is from the 2010 Census and does not reflect current conditions in 2022. As mentioned previously, there is a closed former military base within the City boundaries. As part of the terms of closing and selling the former base site, the United States Navy was required to test for environmental hazards and mitigate those environmental hazards, which has been completed to date on the majority of the site. There may be portions of the base that will require additional clean up, but this cleanup does not need to occur, nor does it impact, the sites identified in the Sites Inventory. However, it is City staff's understanding that the CalEnviroScreen data does not incorporate all information on the extensive site cleanup.

In order to address the conditions described above, the Housing Plan (Chapter 8) contains the following program:

**PP-M.5: Reduce Exposure to Environmental Pollution.** The City is in the process and has taken several steps to identify climate impacts, reduce pollutants and greenhouse gas emissions (GHG), and prepare for a climate resilient future by completing the following:

- A Local Hazard Mitigation Plan (adopted by City Council in October 2020 and approved by the Federal Emergency Management Agency (FEMA) on December 17, 2020).
- A Strategic Energy Plan (adopted by City council on November 10, 2020).
- Forming the first Community Choice Energy initiative in Orange County in an effort to give consumers clean energy choices and reduce GHG emissions (completed in 2022).
- The development of a Climate Action and Adaptation Plan (in process) to:
  - Guide the implementation of measurable actions to meet or exceed the State's GHG reduction targets and climate neutrality goal, as well as the City's ambitious carbon neutral by 2030 goals.
  - Recommend adaptation measures that build resilience to current and future climate threats.

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- Emphasize climate goals for the community, establishing an aspirational, yet achievable path that provides options to realize aggressive emissions reduction targets by 2030, 2035, and 2045.
- Continuing to require added greenery throughout the City to reduce exposure to environmental pollution such as vehicle emissions through the City’s Zoning Ordinance (Section 3-15-4) that requires boundary landscaping for all residential attached (i.e., multi-family) projects. The requirements dictate that a minimum of one 15-gallon tree shall be provided for every 30 feet of interior boundary on all building sites.
- Irvine Cool City Challenge, a \$1 million grant competition among California cities to develop the most innovative pathways to carbon neutrality, including the Cool Block program which requires recruiting 200 Cool Block team leaders to improve sustainability and quality of life in their own neighborhoods. This Challenge will reduce climate emissions and utility bills while building resiliency and local emergency preparedness against climate disasters such as extreme heat, floods, wildfires, and extreme storm events. The City has partnered with over 25 community organizations and registered over 200 volunteers who are interested and committed to climate action in Irvine to date.

Additionally, to further efforts to provide adequate parks and open space to all parts of the community, the City will prepare a comprehensive design strategy to include passive urban park setting for every project and include other placemaking strategies.

The City’s existing Zoning Ordinance requires that green park space be provided in connection with new residential development. More specifically, the Ordinance contains park dedication requirements (i.e., land, improvements, fees, or any combination thereof) for all standalone multi-family residential projects. The existing development standards require five acres of park land for every 1,000 population (three acres of neighborhood park and two acres of community park). When new residential development occurs, the park requirements are prorated for the estimated population added. Affordable housing projects have a reduced requirement of three and one-half acres of park land for every 1,000 population (two acres of neighborhood park and one and one-half acres of community park). Park requirements in the Irvine Business Complex are somewhat different due to the urban living environment. These park requirements ensure that as residential development occurs throughout the City, green spaces and trees are planted to help further reduce the City’s carbon footprint.

This program, as implemented, will reduce unsustainable energy use, reduce pollutants, improve air quality, reduce extreme heat events and improve the health outcomes of residents, employees and others in the community.

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## Moderate and Above Moderate-Income Units

Of the total moderate and above moderate-income units in the Site Inventory, 17.0 percent are located in moderate to highest resource areas, while 39.0 percent are located in low resource areas. According to the TCAC/HCD Opportunity Area Map, 42.0 percent of moderate and above moderate units are in areas that have missing/insufficient data. As noted previously, this area has access to resources such as commercial centers, parks, schools, and transit despite the map designation.

Table B-15, TCAC/HCD Opportunity Area Map Summary, provides a summary of units in the Sites Inventory in relation to their location on the TCAC/HCD Opportunity Area Map.

**Table B-15. TCAC/HCD Opportunity Area Map Summary**

TCAC Resources	Lower percent	Moderate percent	Above Moderate percent	Moderate and Above percent	All
<b>Missing/Insufficient Data</b>	46.8 percent	36.9 percent	42.2 percent	41.7 percent	42.8 percent
<b>High Resource</b>	4.6 percent	11.4 percent	3.0 percent	3.8 percent	4.0 percent
<b>Highest Resource</b>	.9 percent	-	1.2 percent	1.1 percent	1.0 percent
<b>Low Resource</b>	12.7 percent	38.1 percent	38.9 percent	38.8 percent	33.2 percent
<b>Moderate Resource</b>	33.7 percent	12.7 percent	13.2 percent	13.1 percent	17.5 percent
<b>Moderate Resource (Rapidly Changing)</b>	-	.8 percent	1.5 percent	1.5 percent	1.1 percent

Furthermore, lower-income sites feature the following characteristics:

- Lower-income sites have a weighted job index score of 96 compared to a score of 97 for moderate- and above-moderate income sites, indicating a high level of access to jobs for all income categories. This is due to higher job indices (above 60) for all block groups and the prevalence of a job index in the high 90s throughout the City:
  - More than 95 percent of lower-income units and more than 91 percent of all units in the Sites Inventory are on sites located within 0.5 miles of a bus stops or transit bases. More than 5,000 units in the Sites Inventory are located less than 1-mile from the Irvine Station.
  - 35 percent of lower-income units are located within one mile of a school, compared to 22 percent of moderate and above-moderate units. All residential units are located within 2.3 miles of a school.

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

## Summary

In general, the City's Sites Inventory (with support from the City's rezone strategy) will affirmatively further fair housing by: distributing lower income housing sites across moderate resource areas (including the higher share of lower-income units located in the City's TCAC/HCD



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moderate resource areas and in areas with better access to jobs, transit, schools, public services, and other amenities) and in areas where housing cost burdens are highest. The Sites Inventory also distributes sites with lower income units throughout the City, rather than clustering or concentrating these planned units in a few areas. Finally, the Sites Inventory effectively leverages sites owned by the City, County and other local public entities to maximize the number of affordable units (the primary fair housing need in the City of Irvine) to help meet the need. Site control is a critical factor in implementing affordable housing. When the cost of land is not included in the cost of implementing an affordable housing project, the project becomes exponentially more feasible to implement given limited funding resources to meet the need for affordable housing.

During the 5<sup>th</sup> Cycle Housing Element planning period, Irvine appeared to create more affordable housing than all Orange County cities **combined**. With the numerous housing programs and actions proposed in this 6<sup>th</sup> Cycle Housing Element, the City will continue to be the leader in the creation of affordable housing options for the region.

### Contributing Factors

A fair housing contributing factor is a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Examining the history, planning patterns and evolution of Irvine, coupled with the data and analysis presented earlier in this section, is an important step in identifying and prioritizing contributing factors and effective solutions to further fair housing in the City.

As detailed in this section, Irvine is a relatively young City that incorporated 50 years ago as a master planned community where planning patterns and land use were guided by prioritizing quality of life characteristics for families and individuals, such as streets that are major thoroughfares to mitigate traffic issues, open space, parks and schools near planned residential areas, buffering commercial and industrial uses from residential units by clustering those uses in specific areas (such as the Irvine Business Complex near John Wayne Airport and the Irvine Spectrum near the “El Toro Y” where the 5 and 405 freeways meet). Irvine has matured into a racially and ethnically diverse community with a strong employment base as well as both a highly ranked public school system and public safety ranking among California cities. These attributes, along with the City’s central Orange County location, has made Irvine a highly desirable place to live for many people to live which has also led to increased market prices for housing that reflect this desirable. The increase in housing prices has increased the need for affordable housing in the community.

This information, combined with surveys of the community and discussions with community members, affordable housing developers, and an assessment of fair housing issues, guided the identification of four factors that contribute to fair housing in the City of Irvine with a lack of affordable housing being the primary issue that is the focus of the majority of the goals,

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objectives, policies, and programs contained in the Housing Plan. Table B-16, below presents all factors identified, the priority level and a list of programs (with detail provided in the Housing Plan) to address contributing factors. The City has included twenty-five (25) programs to facilitate the increased development of affordable housing.

<b>Table B-16. Factors that Contribute to Fair Housing Issues in Irvine</b>			
<b>AFH IDENTIFIED FAIR HOUSING ISSUES</b>	<b>CONTRIBUTING FACTORS</b>	<b>PRIORITY (HIGH, MEDIUM, LOW)</b>	<b>MEANINGFUL ACTIONS</b>

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<p>Lack of Affordable Housing</p>	<p>Shortage of affordable rental and homeownership options</p>	<p>High</p>	<ul style="list-style-type: none"> <li>• Partner with University of California, Irvine (UCI) to Identify and Track University Housing (PP-A.5).</li> <li>• Assist with Development of Low-Income Housing (PP-B.1)</li> <li>• Expedite Development (PP-B.2)</li> <li>• Explore Dedicated Staff for Affordable Housing Entitlement, Permit and Fee Processes (PP-B.5)</li> <li>• Senate Bill (SB) 35 Streamlined and Ministerial Approval Process (PP-B.5)</li> <li>• Plan to Encourage and Incentivize ADUs (PP-C.4)</li> <li>• Affordable Housing Preservation/Committed Assistance Program (including Financial Resources and In-Kind Services) (PP-D.1)</li> <li>• Continue the Conservation and Monitoring of Existing and Future Affordable Units (PP-D.2)</li> <li>• Monitor Grant Opportunities and Maximize Grant Applications (PP-E.2)</li> <li>• Inclusionary Housing Ordinance Update (PP-E.3)</li> <li>• Explore Local Funding Options (PP-E.4)</li> <li>• <b>Utilize Available Funding Tools and/or Public/Private Partnerships to Create Lower Income and Workforce Housing (PP-E.5)</b></li> <li>• Leverage City-Owned Land for the Development of 100 percent Affordable Housing Projects (PP-F.1)</li> <li>• Irvine Community Land Trust (PP-F.2)</li> <li>• Collaborate with Public Agencies to Leverage Other Publicly Owned Land for the Development of Affordable Housing Projects through Master Planning and Disposition Efforts (PP-F.3)</li> <li>• Continue to Apply “Additive” Intensity (under the Land Use Element) for Affordable Housing (PP-G.1)</li> <li>• Zoning Changes (PP-G.3)</li> <li>• Housing Choice Vouchers (PP-G.5)</li> <li>• Irvine Housing Authority (PP-G.6)</li> <li>• Terms of Affordability (PP-G.7)</li> <li>• Housing Options (PP-I.2)</li> <li>• Leverage all Funding Options (PP-I.3)</li> <li>• Displacement Prevention (PP-J.2)</li> <li>• Density Bonus Eligibility (PP-M.3)</li> </ul>
<p>Land use and zoning laws</p>	<p>Underutilized properties (i.e., retail centers and hotels) that could provide new affordable housing opportunities for Irvine residents</p>	<p>Medium</p>	<ul style="list-style-type: none"> <li>• Update the City’s Zoning Ordinance to Allow for Higher Densities in Areas with Underdeveloped/Underutilized Property (PP-C.1)</li> <li>• Continue to Apply “Additive” Intensity (under the Land Use Element) for Affordable Housing (PP-G.1)</li> <li>• Zoning Changes (PP-G.3)</li> <li>• Update the City’s Zoning Ordinance and Policies Related to Emergency Shelters, Low-Barrier Navigation Centers, Supportive Housing, and Group Care Facilities to Comply with Current Laws (PP-I.1)</li> <li>• Update and Implement the City’s General Plan - Land Use Element/Amend Zoning Ordinance (PP-L.1)</li> </ul>
<p>Lack of renter protections/Displacement risk</p>	<p>Economic uncertainty from pandemic increased risk of displacement for lower income households</p>	<p>Low</p>	<ul style="list-style-type: none"> <li>• Displacement Prevention (PP-J.2)</li> <li>• Provide Information and Education to Residents on the City’s Website (PP-M.1)</li> </ul>

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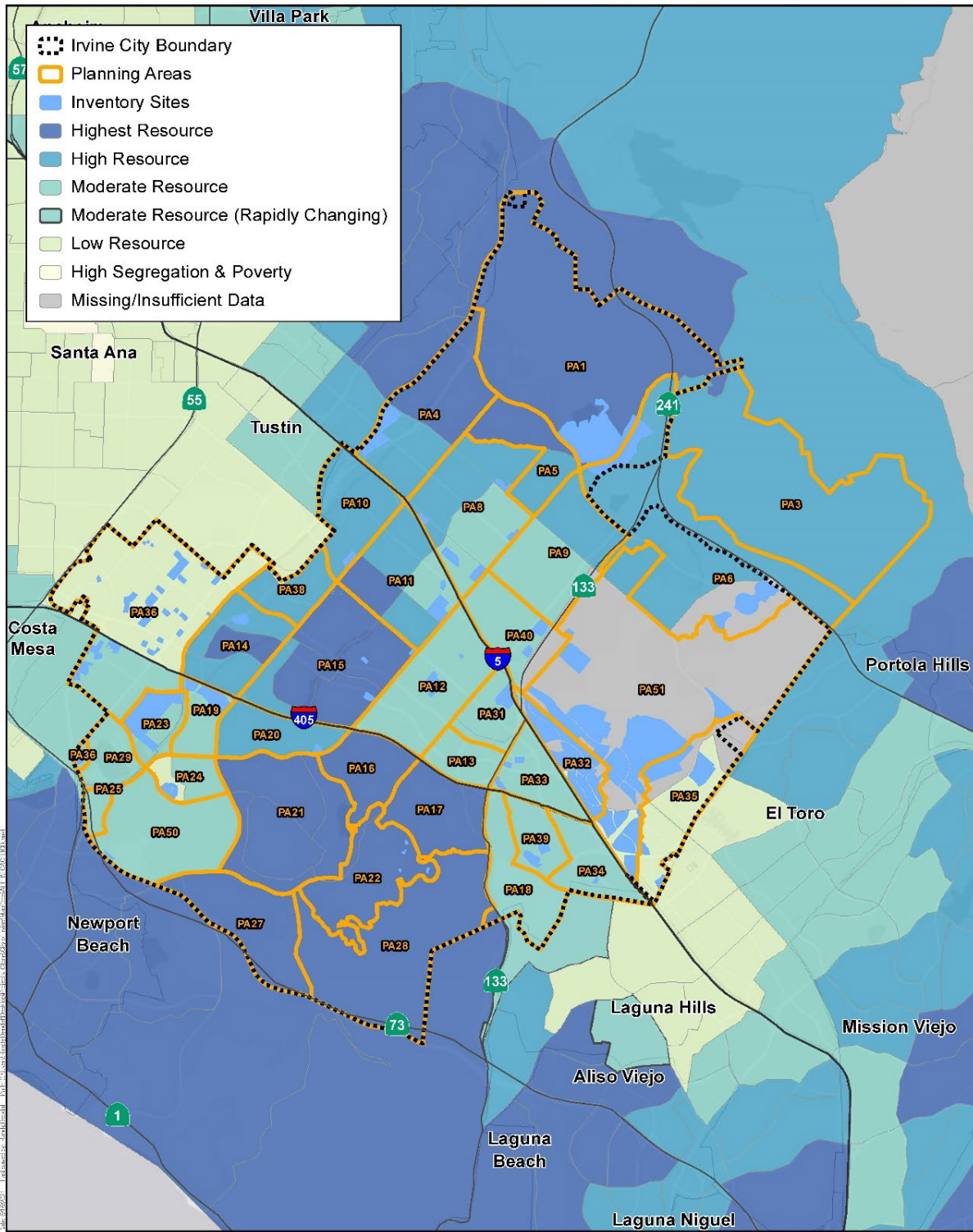
Lack of supportive housing in community-based settings	Permanent supportive housing can be better integrated in multifamily housing	Low	<ul style="list-style-type: none"><li>• Update the City's Zoning Ordinance and Policies Related to Emergency Shelters, Low-Barrier Navigation Centers, Supportive Housing, and Group Care Facilities to Comply with Current Laws (PP-I.1)</li><li>• Housing Options (PP-I.2)</li></ul>
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As identified in the assessment of disproportionate housing need and displacement risk there is a shortage of both rental and ownership housing that is affordable to all lower-income households. The City is aware of this affordability issue and has identified the need for a variety of types of affordable housing as well as improving access to amenities and opportunities in low resource areas as priorities to meet unmet needs and address fair housing. The City has incorporated actions throughout the Housing Element goals, policies, and programs to address these factors, and all issues identified in this assessment. The programs in this Housing Element will affirmatively further fair housing, per AB 686, and are intended to address significant disparities in housing needs and in access to opportunity for all groups protected by State and Federal law. Furthermore, the programs in this Housing Element will ensure that the City of Irvine furthers patterns of integration and development of affordable housing in such a way that it will have a positive impact on residents of the City and the region.

# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-6. TCAC/HCD Opportunity Area Map



Source: California Tax Credit Allocation Committee 2021.



### 2021 TCAC/HCD Opportunity Map

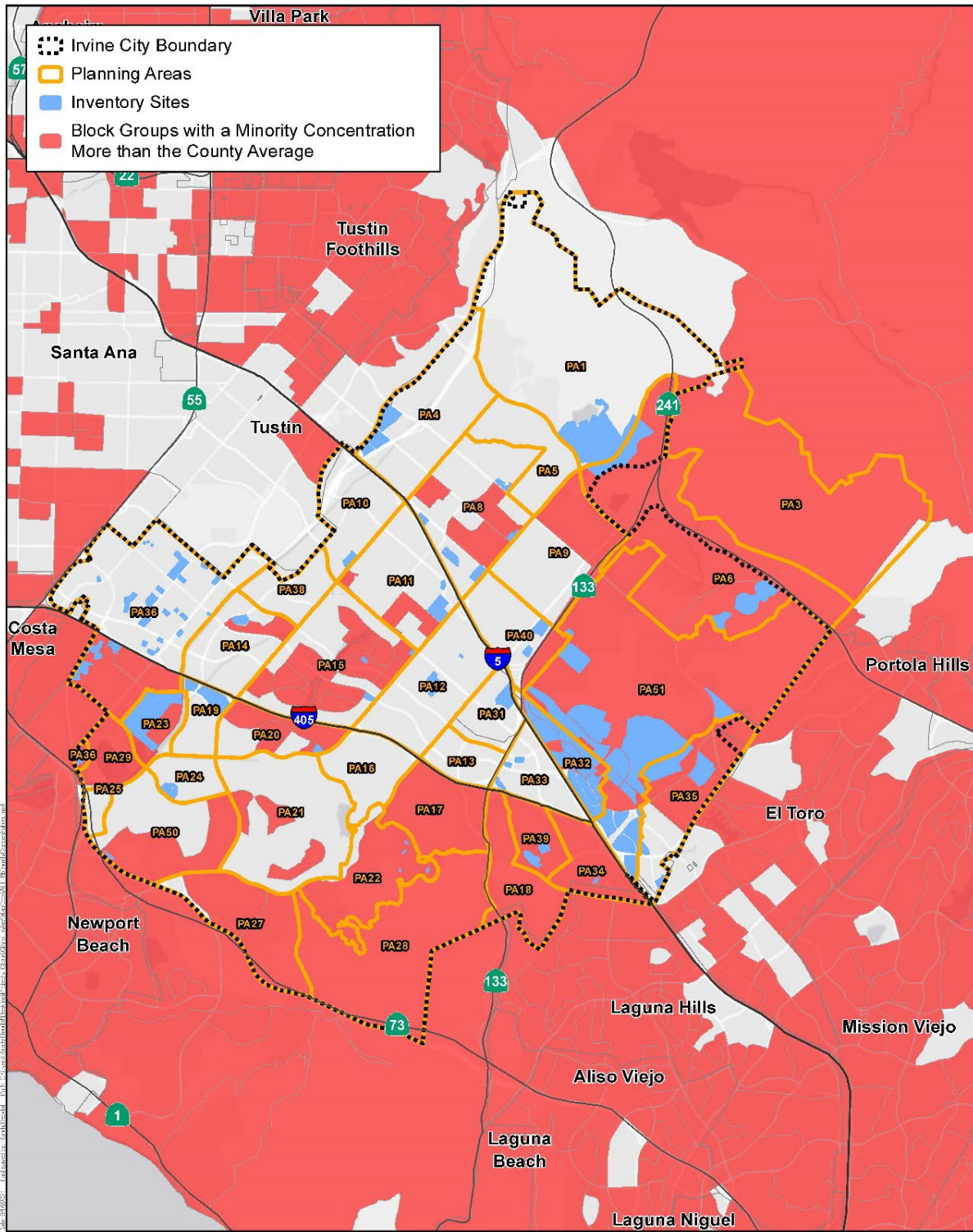
City of Irvine Affirmatively Furthering Fair Housing



# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-7. Minority Concentration Map



Source: American Community Survey 2014 - 2018.

 **Harris & Associates**  

### Minority Concentration

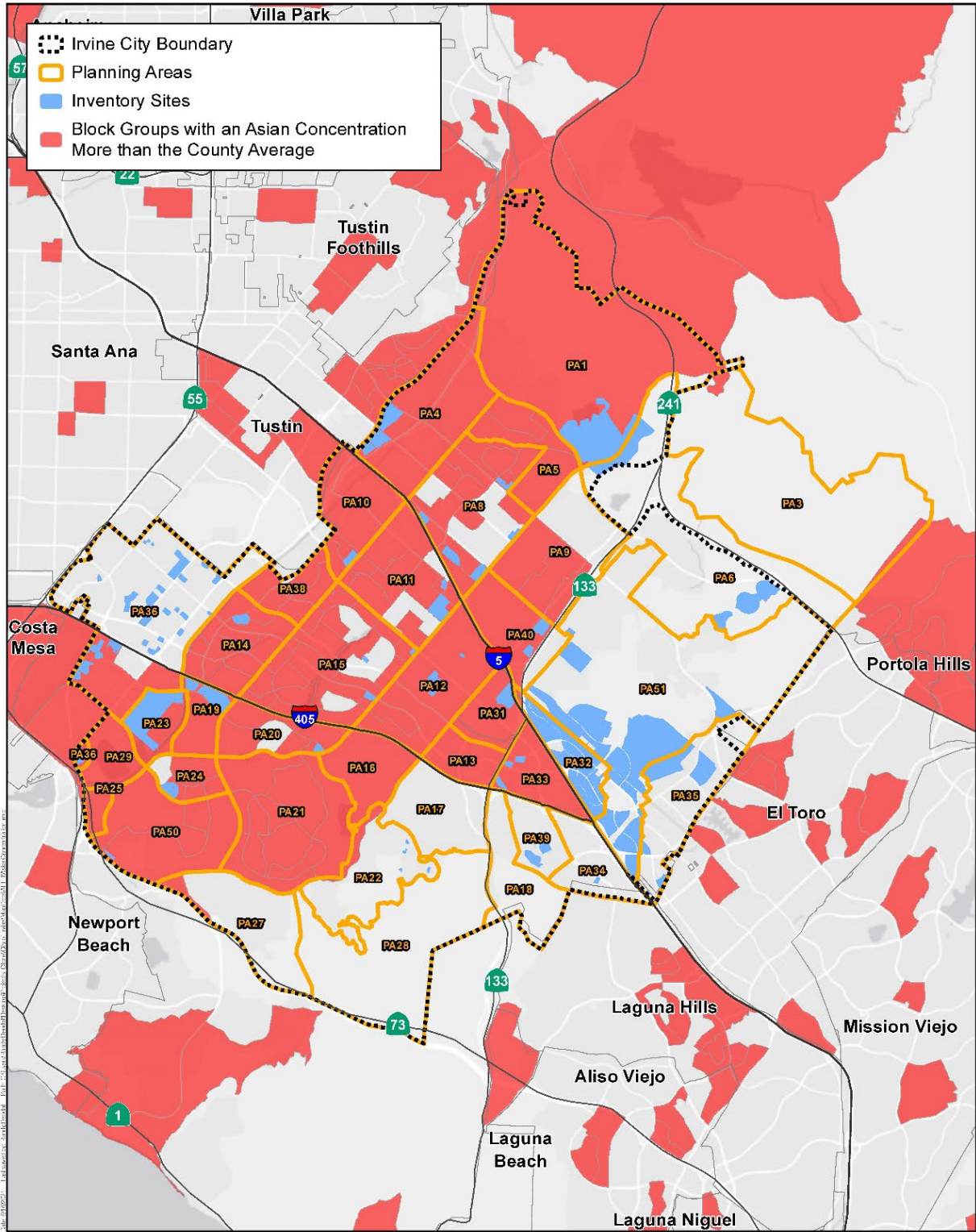
City of Irvine Affirmatively Furthering Fair Housing



# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-8. Asian Concentration Map



Source: American Community Survey 2014 - 2018



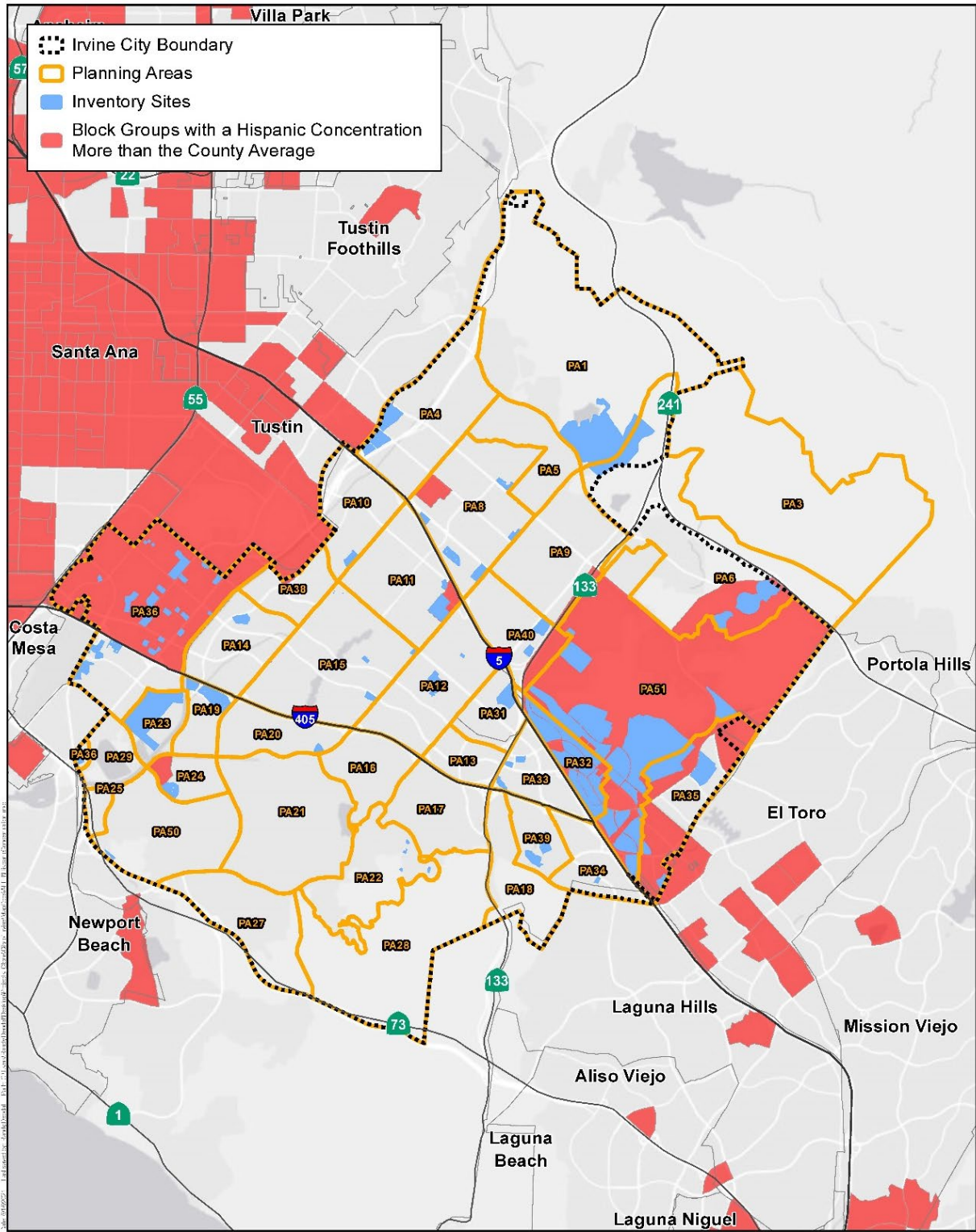
### Asian Concentration

City of Irvine Affirmatively Furthering Fair Housing

# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-9. Hispanic Concentration Map



Source: American Community Survey 2014 - 2018



### Hispanic Concentration

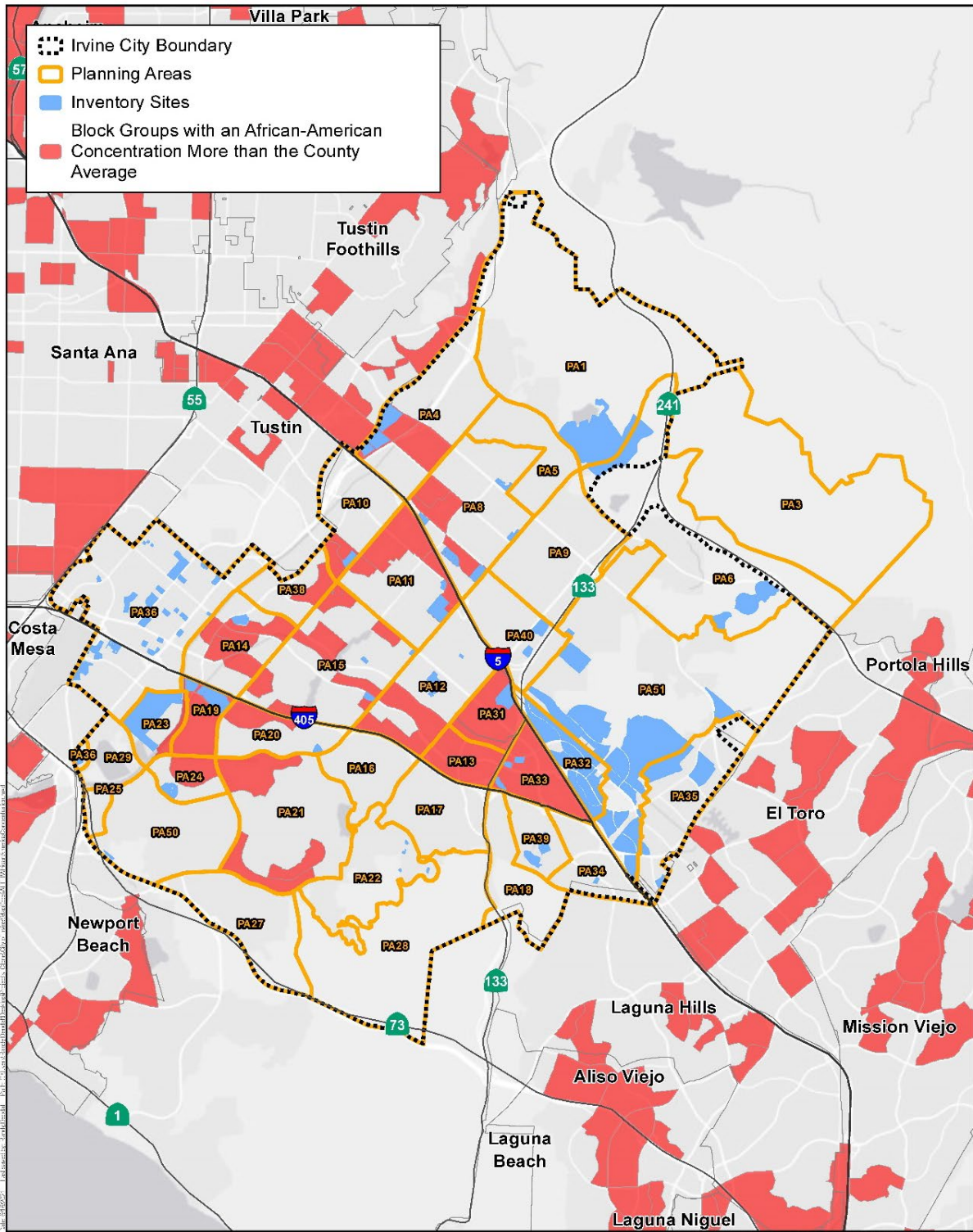
City of Irvine Affirmatively Furthering Fair Housing



# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

### Figure B-10. African American Concentration Map



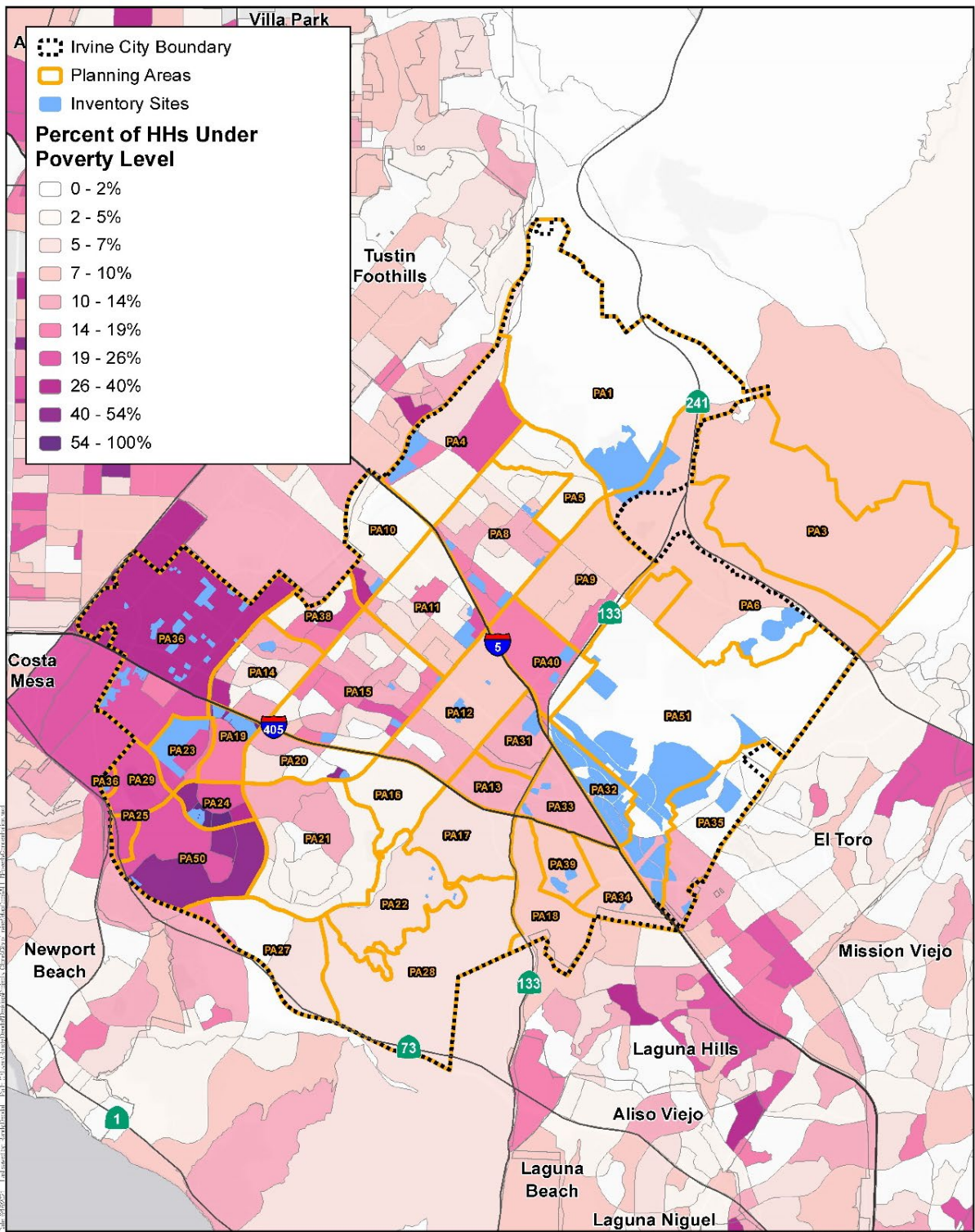
### African-American Concentration

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# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-11. Poverty Concentration Map

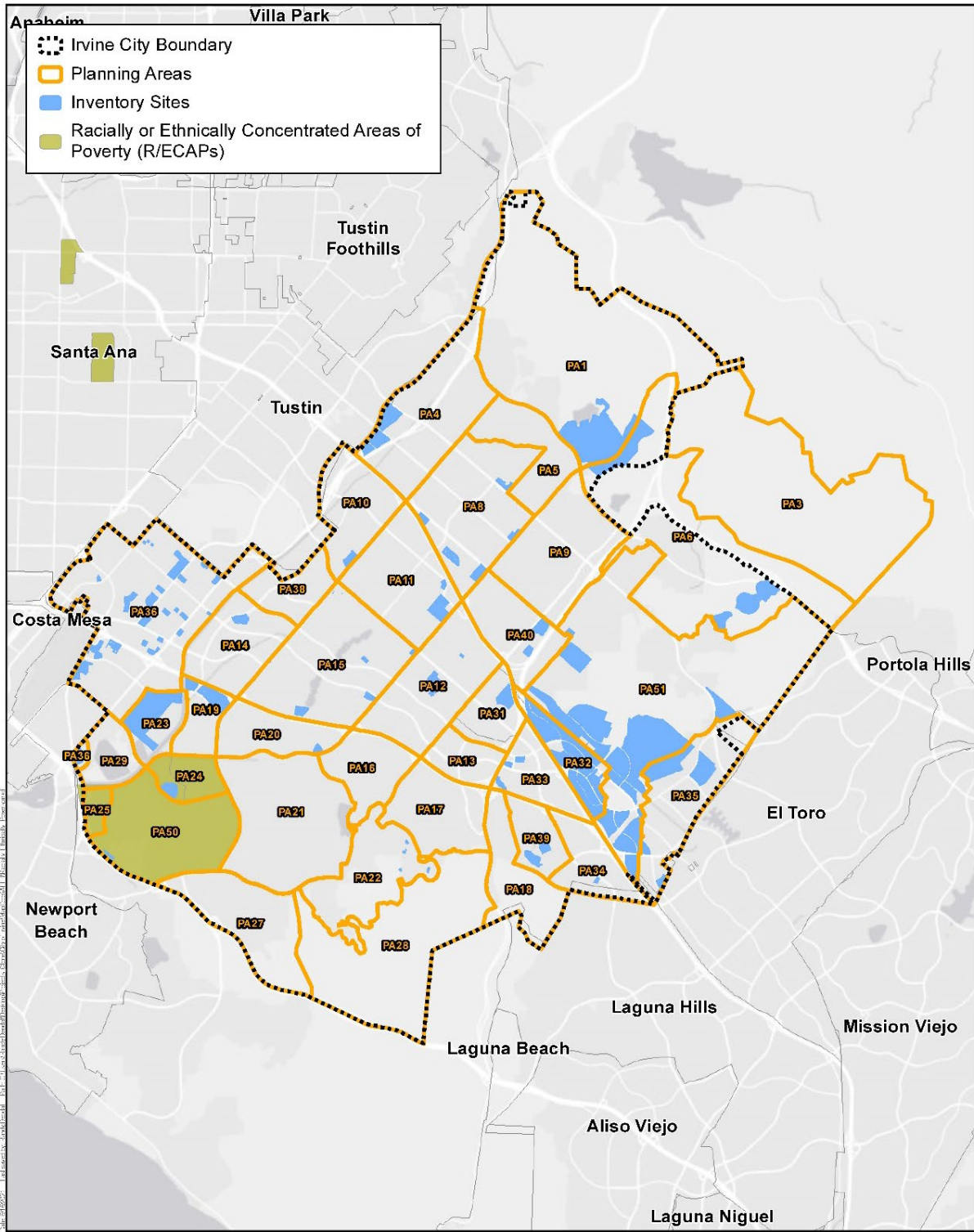




# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-12. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) Map



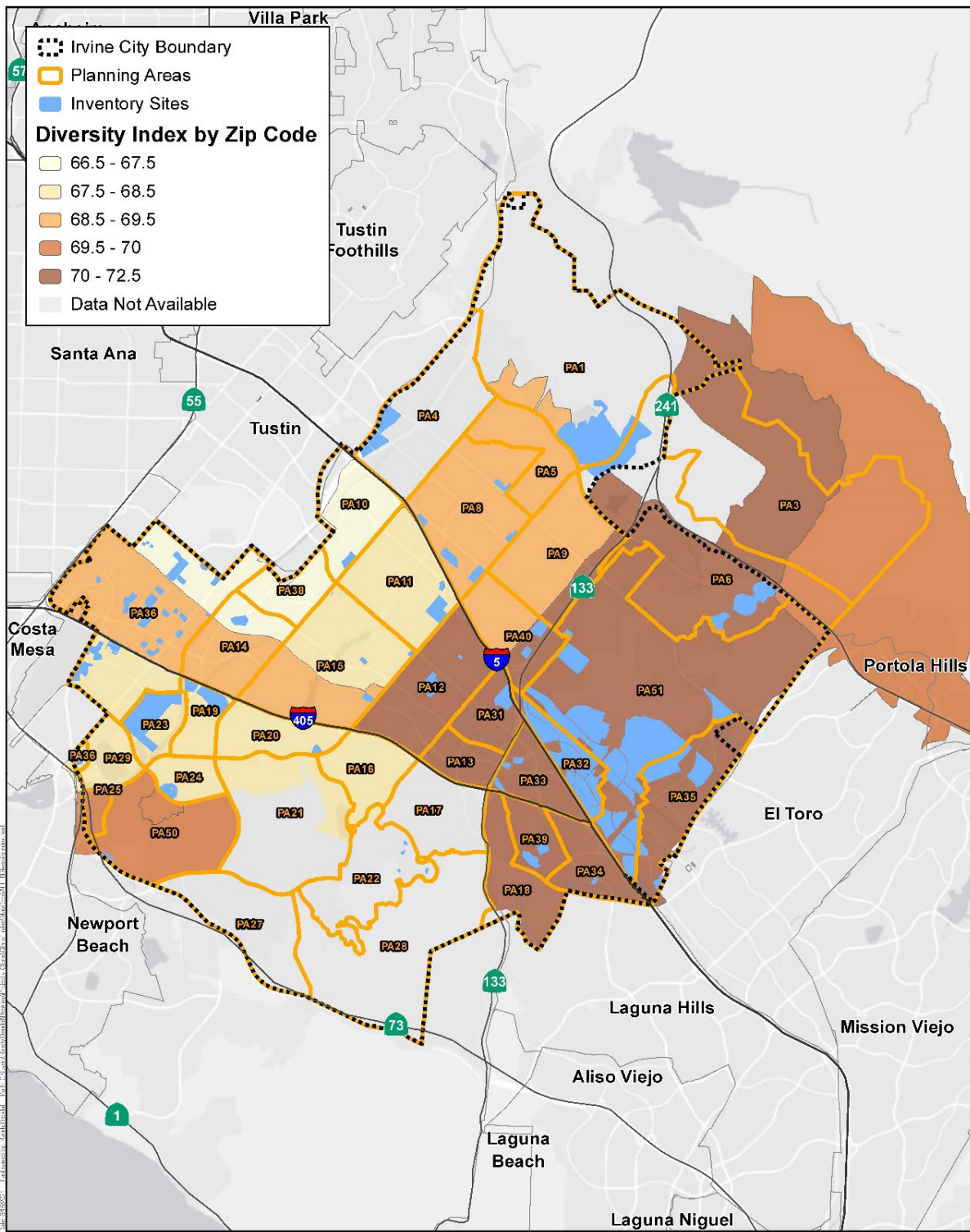
**Racially and Ethnically Concentrated Areas of Poverty**  
City of Irvine Affirmatively Furthering Fair Housing

Source: HUD 2015.

# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-13. Diversity Index Map



Diversity Index

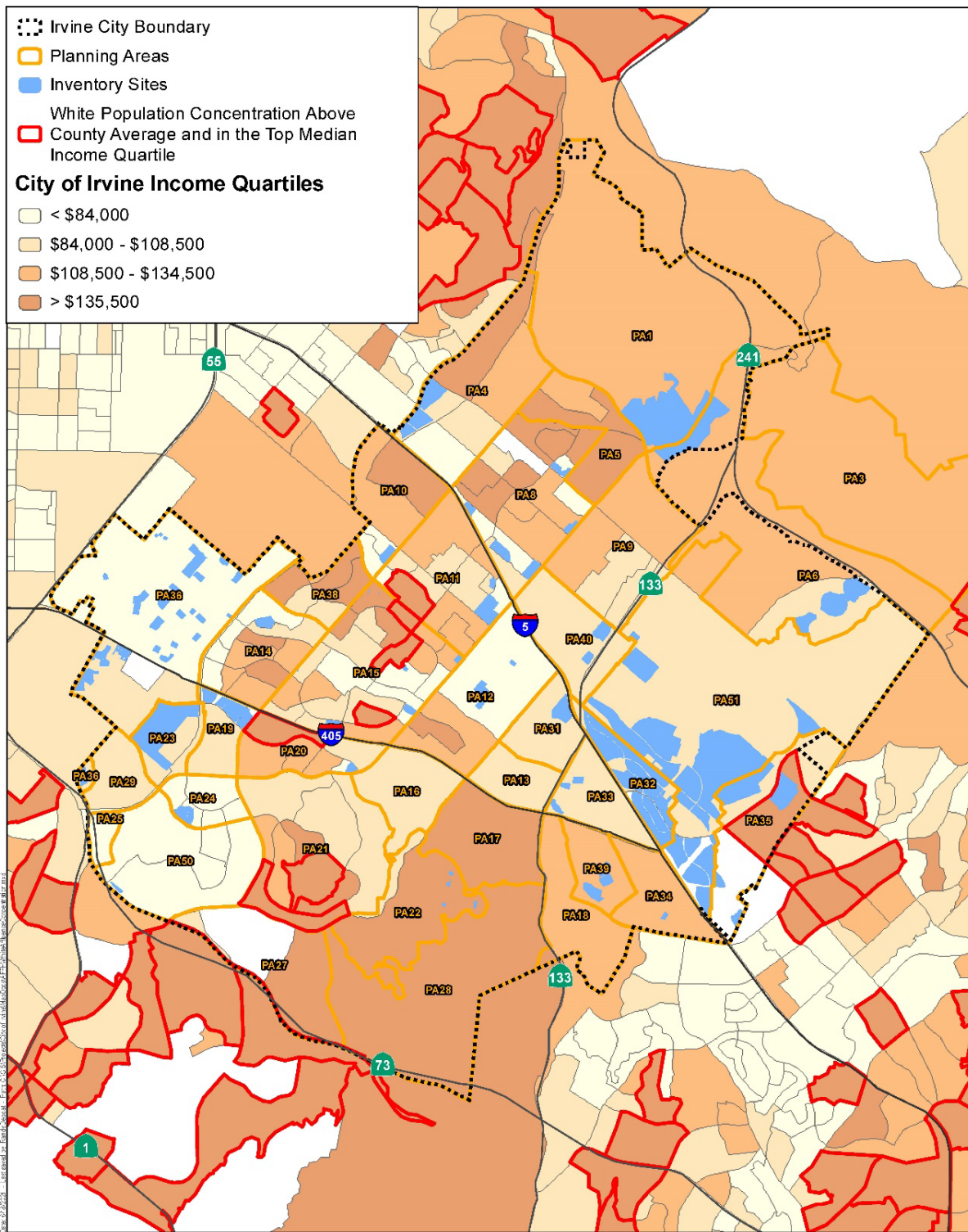
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# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-14. Racially Concentrated Areas of Affluence



Source: American Community Survey 2018.



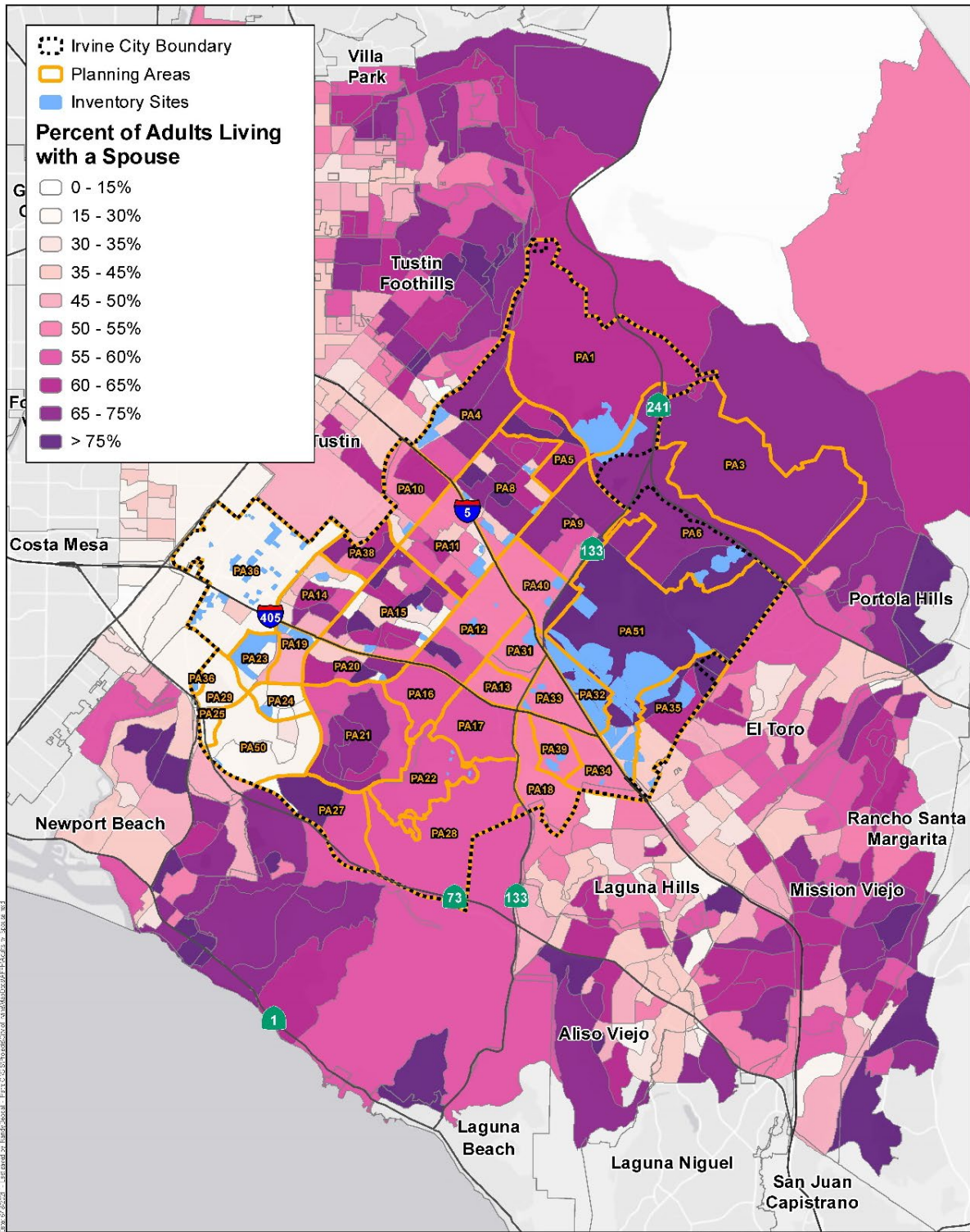
### Racially Concentrated Areas of Affluence

City of Irvine Affirmatively Furthering Fair Housing

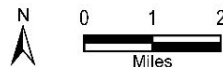
# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-15. Percent of Adults Living with Spouse Map



Source: American Community Survey 2014 - 2018.



Percent of Adults Living with a Spouse

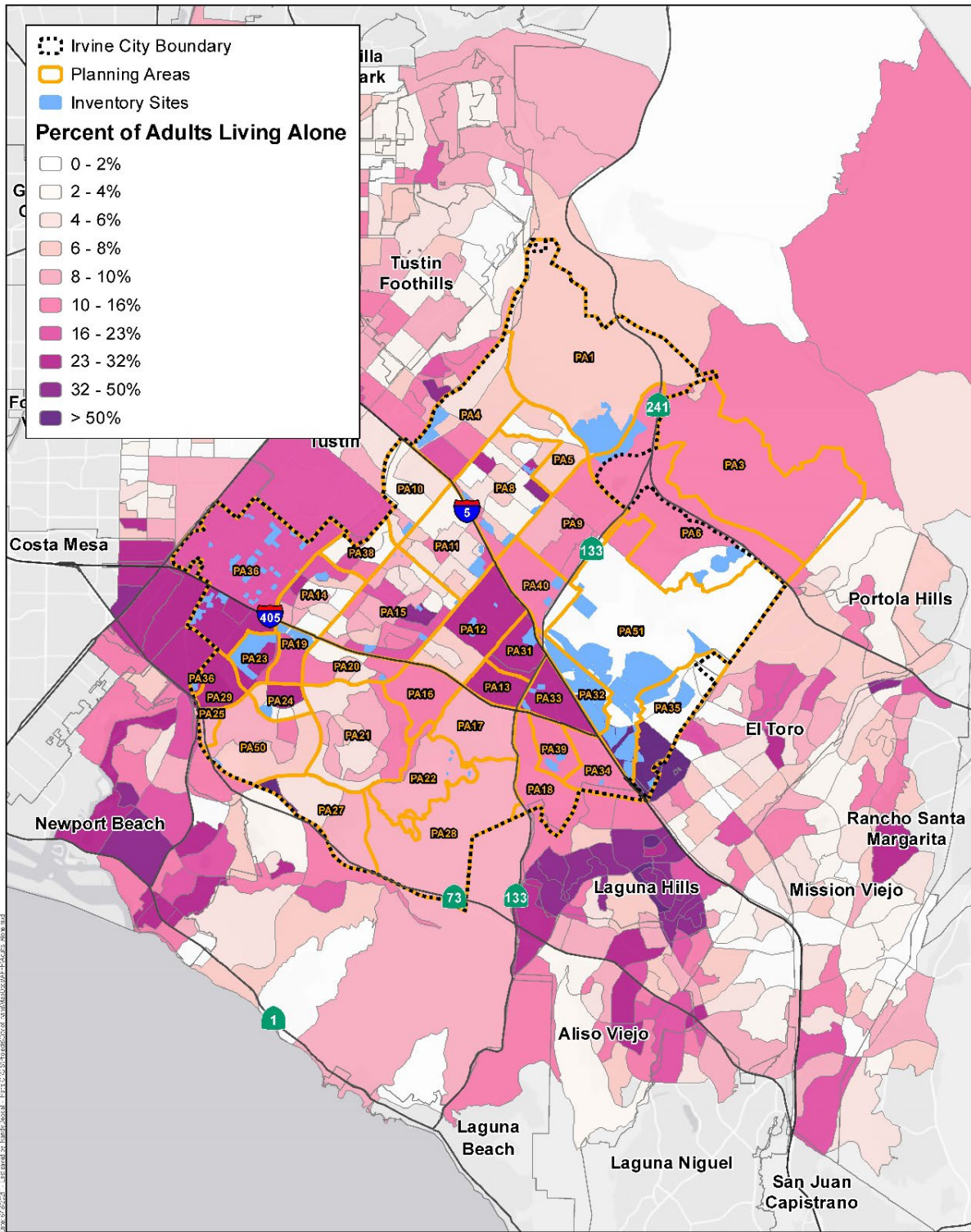
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# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-16. Percent of Adults Living Alone Map



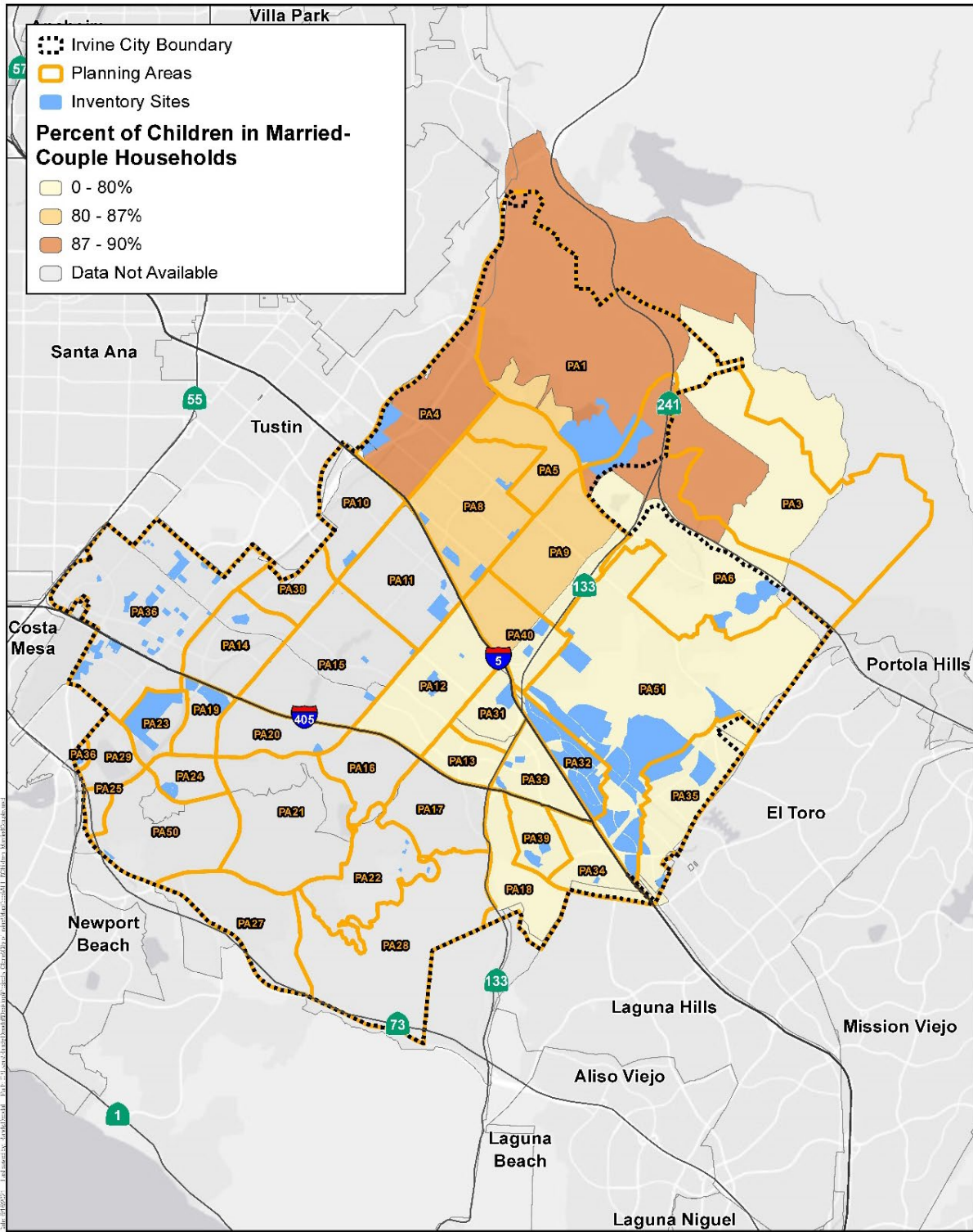
Source: American Community Survey 2014 - 2018.



**Percent of Adults Living Alone**

City of Irvine Affirmatively Furthering Fair Housing

Figure B-17. Percent of Children in Married-Couple Families Map



Source: ESRI 2019.



Children in Married-Couple Families

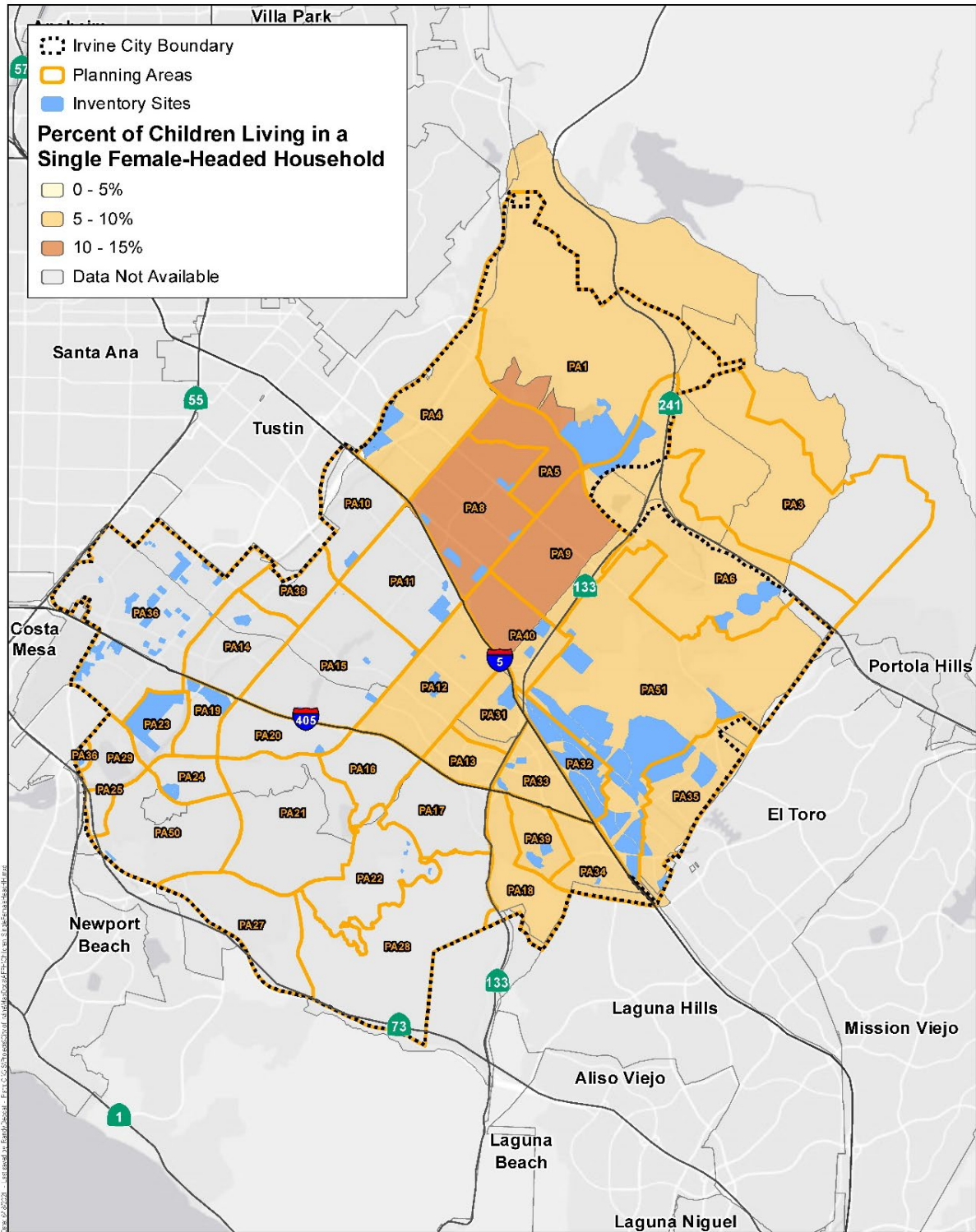
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# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-18. Percent of Children in Single Female-Headed Households Map

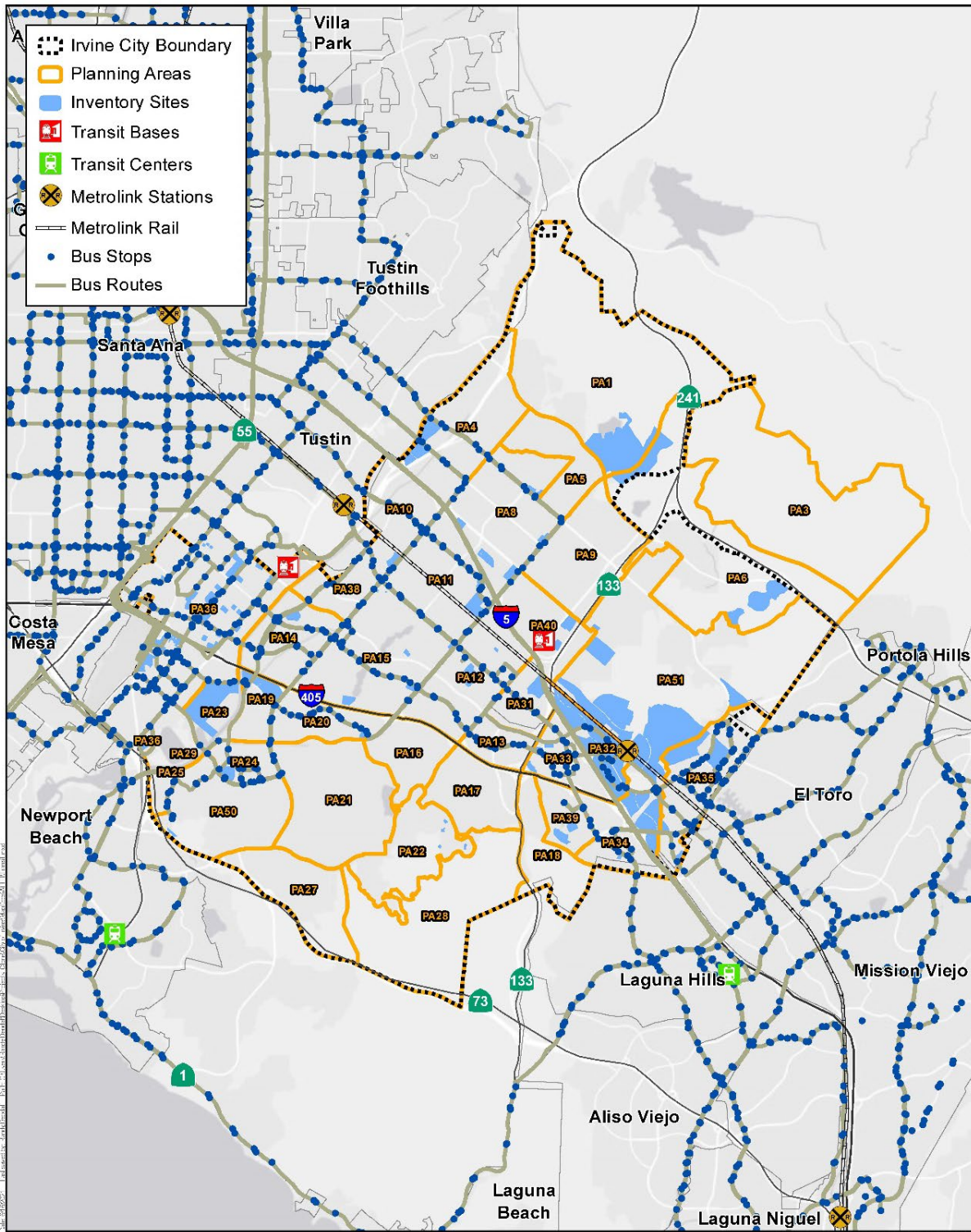


**Children Living in Single Female-Headed Households**  
City of Irvine Affirmatively Furthering Fair Housing

# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-19. Transit Proximity Map



Source: Orange County 2014, 2021.



Irvine Transit

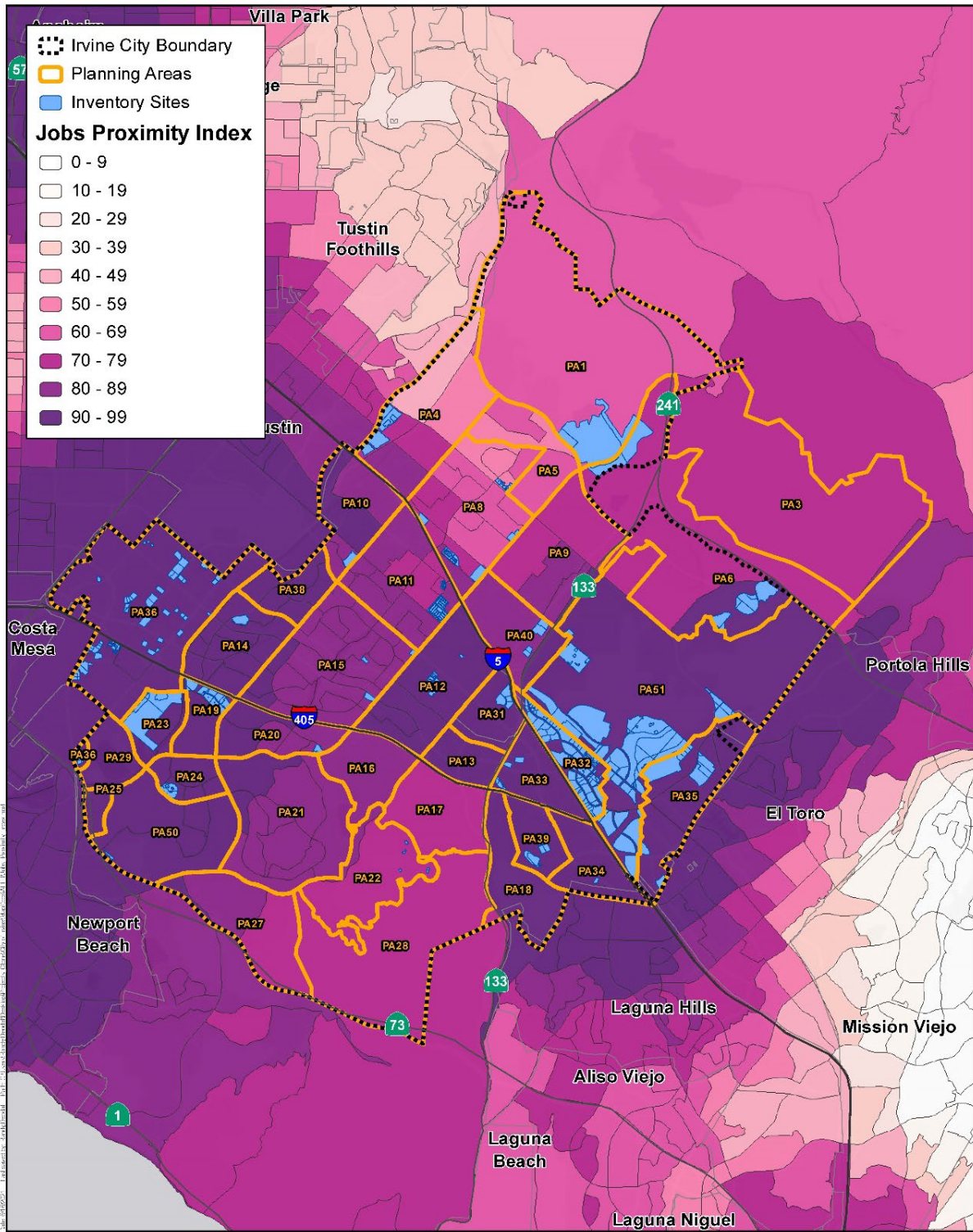
City of Irvine Affirmatively Furthering Fair Housing



# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-20. Jobs Proximity Map



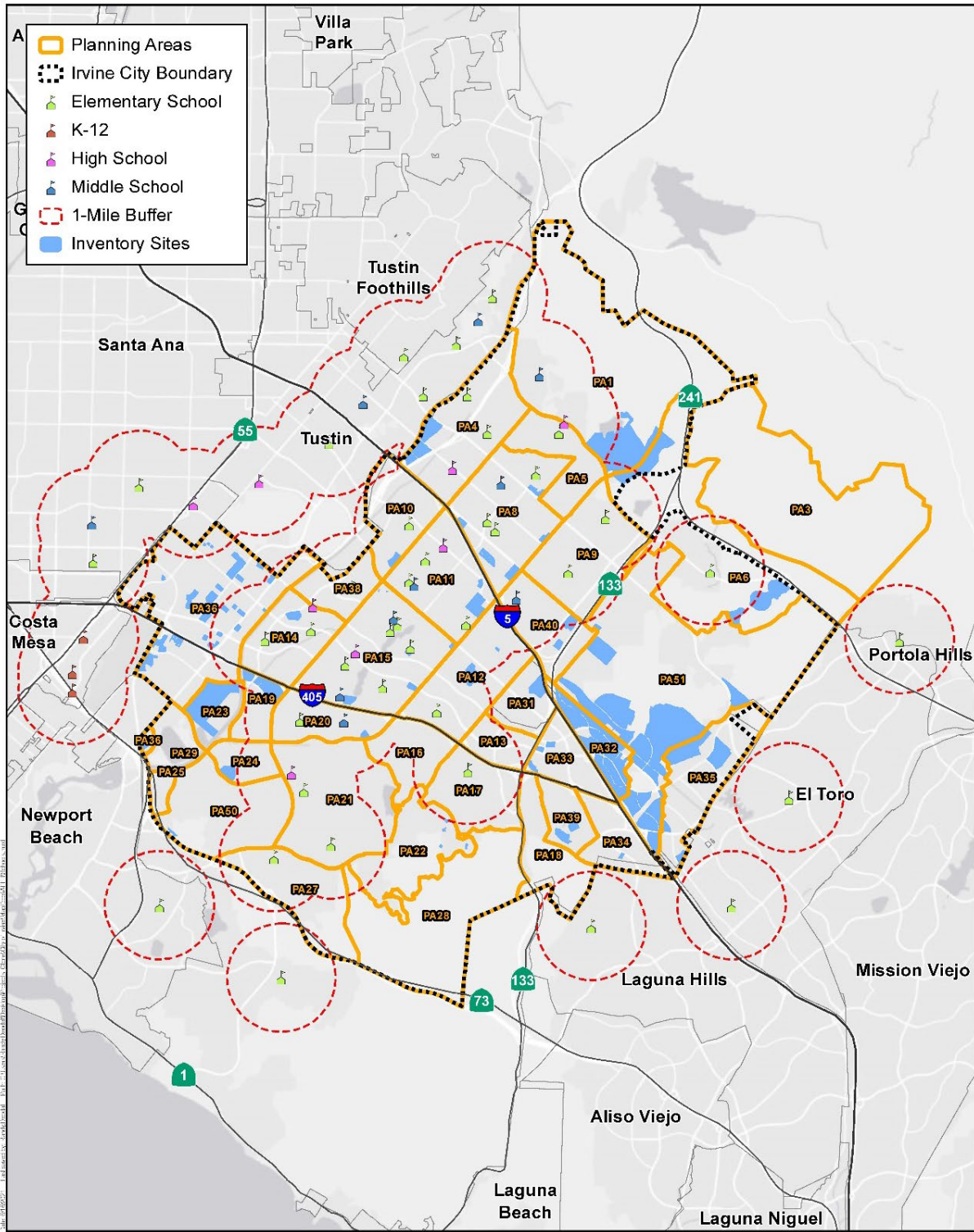
Jobs Proximity Index

City of Irvine Affirmatively Furthering Fair Housing

# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-21. Schools Proximity Map



Source: City of Irvine 2021.



Irvine Schools

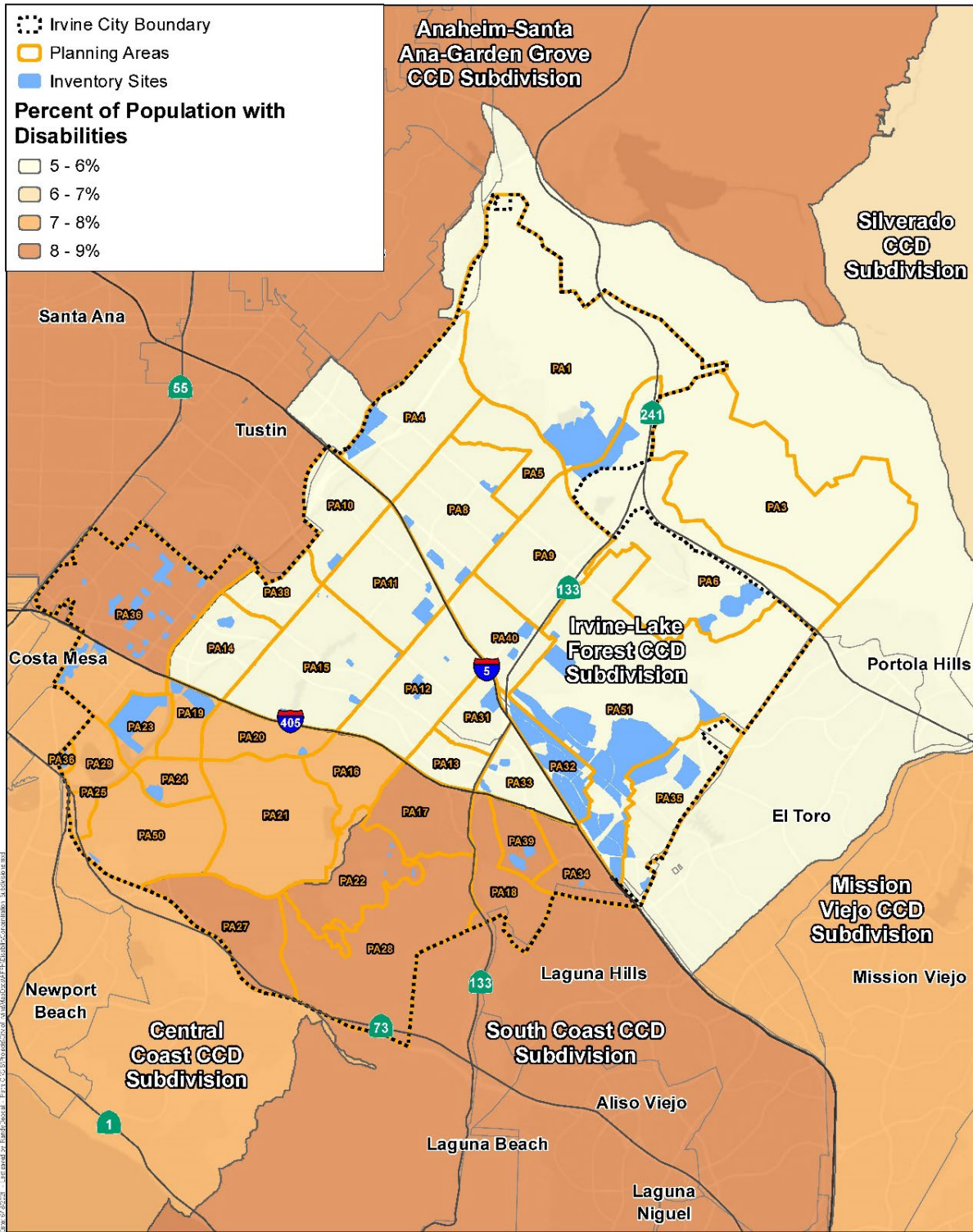
City of Irvine Affirmatively Furthering Fair Housing



# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-22. Percent of People with Disabilities Regional Map



Source: American Community Survey 2018.



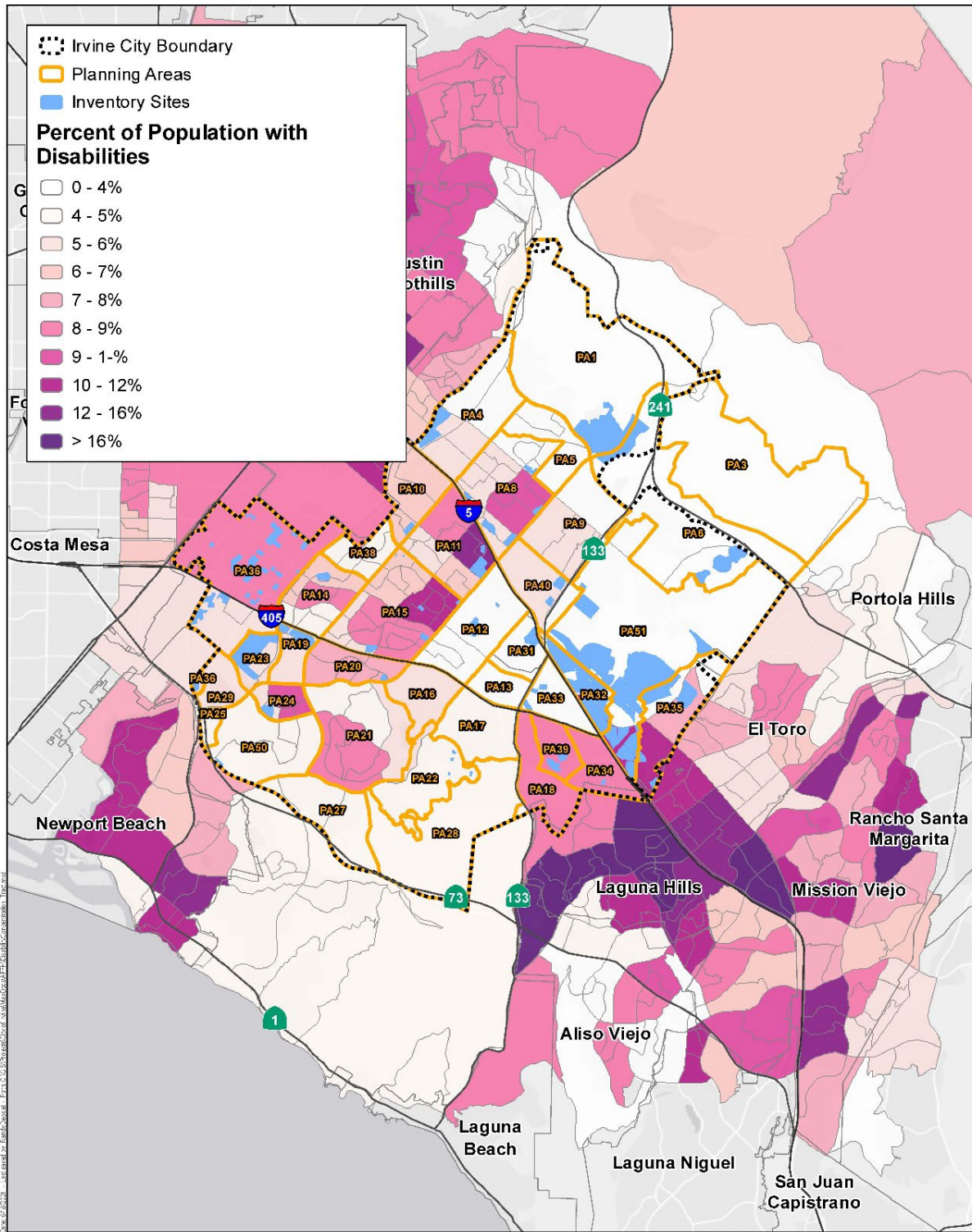
Percent of Population with Disabilities

City of Irvine Affirmatively Furthering Fair Housing

# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-23. Percent of People with Disabilities Local Map



Source: American Community Survey 2014 - 2018.



**Percent of Population with Disabilities**

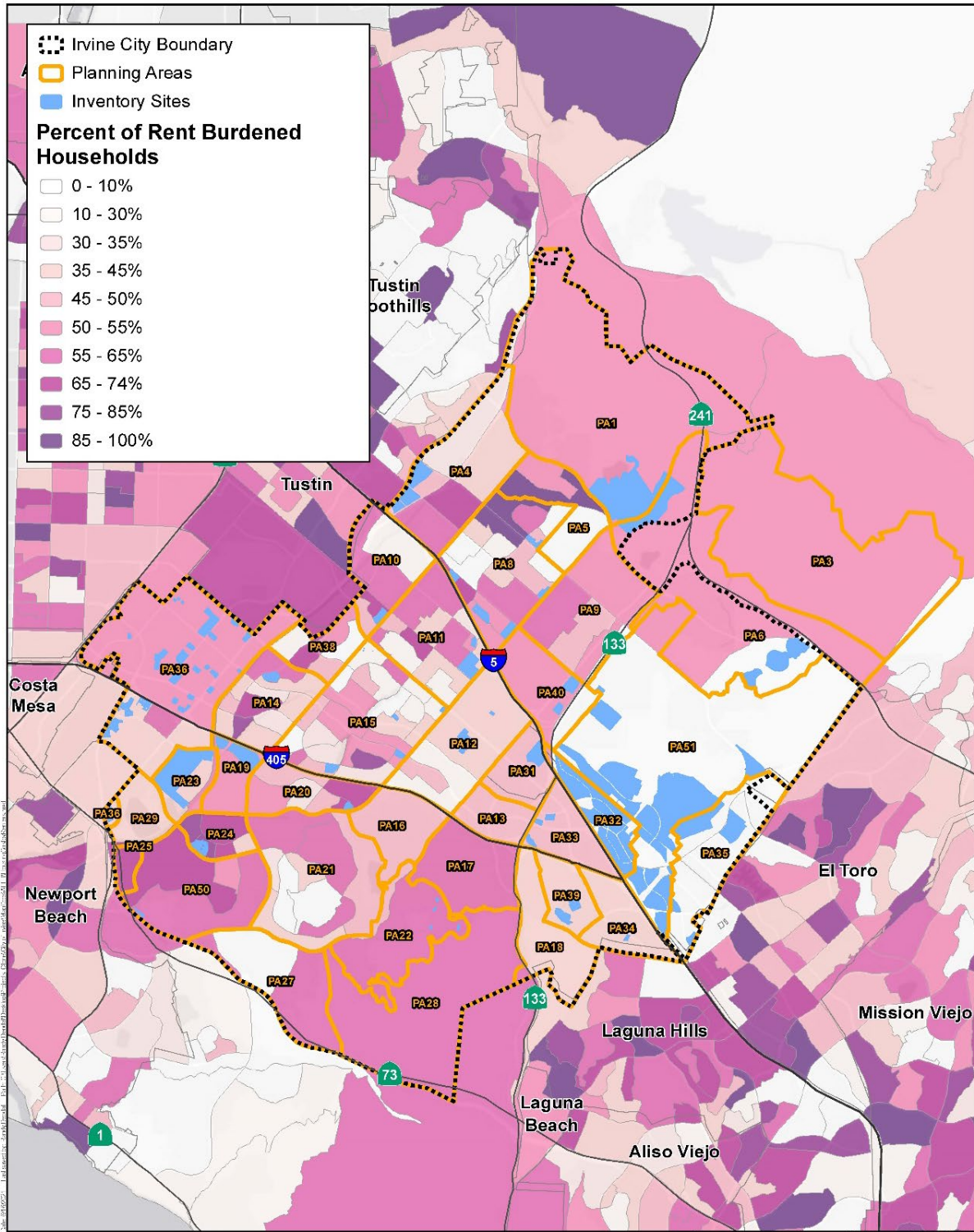
City of Irvine Affirmatively Furthering Fair Housing



# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-24. Renter Cost Burden Map



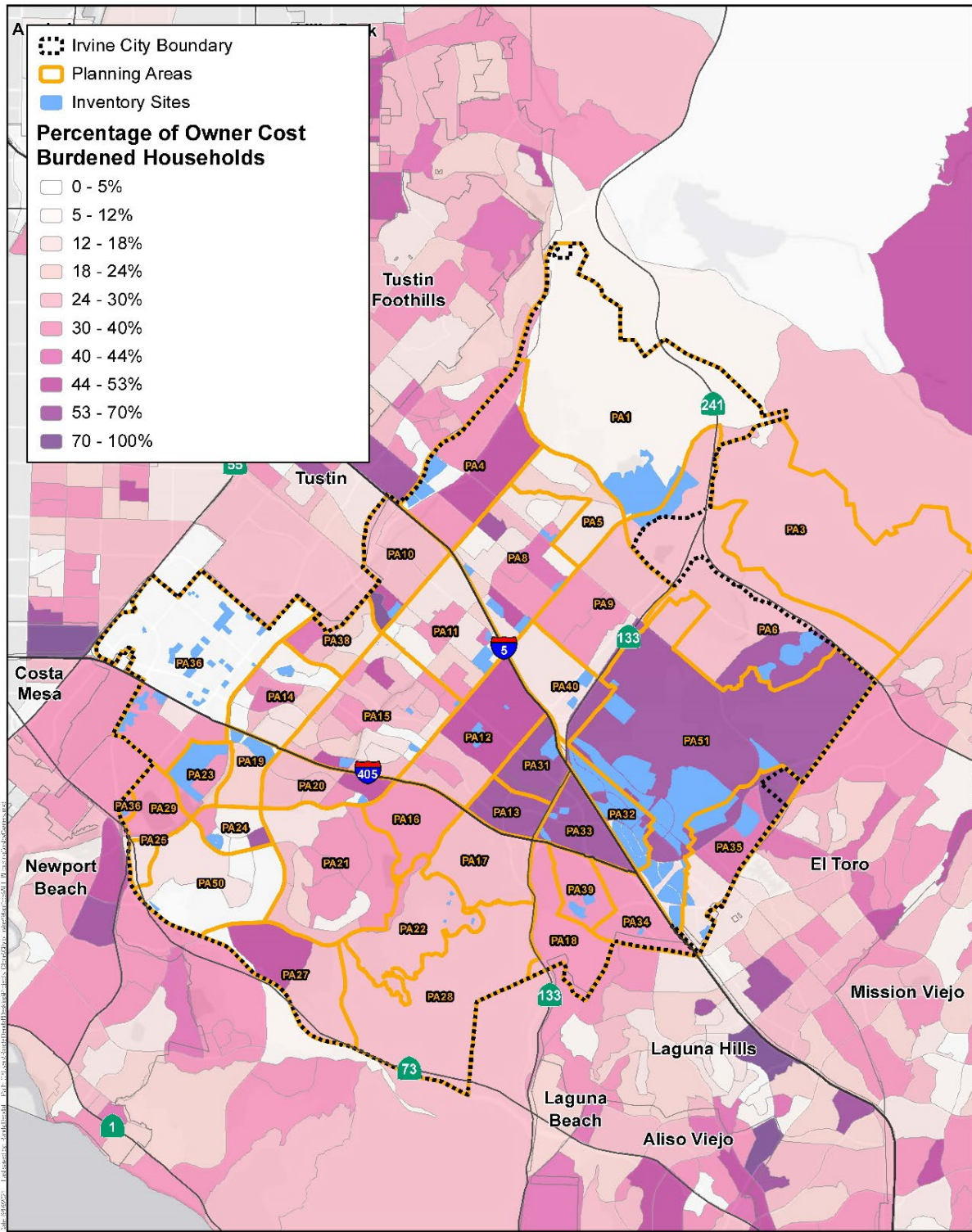
### Housing Cost Burden by Renters

City of Irvine Affirmatively Furthering Fair Housing

# 2021–2029 Housing Element

## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-25. Owner Cost Burden Map





# 2021–2029 Housing Element

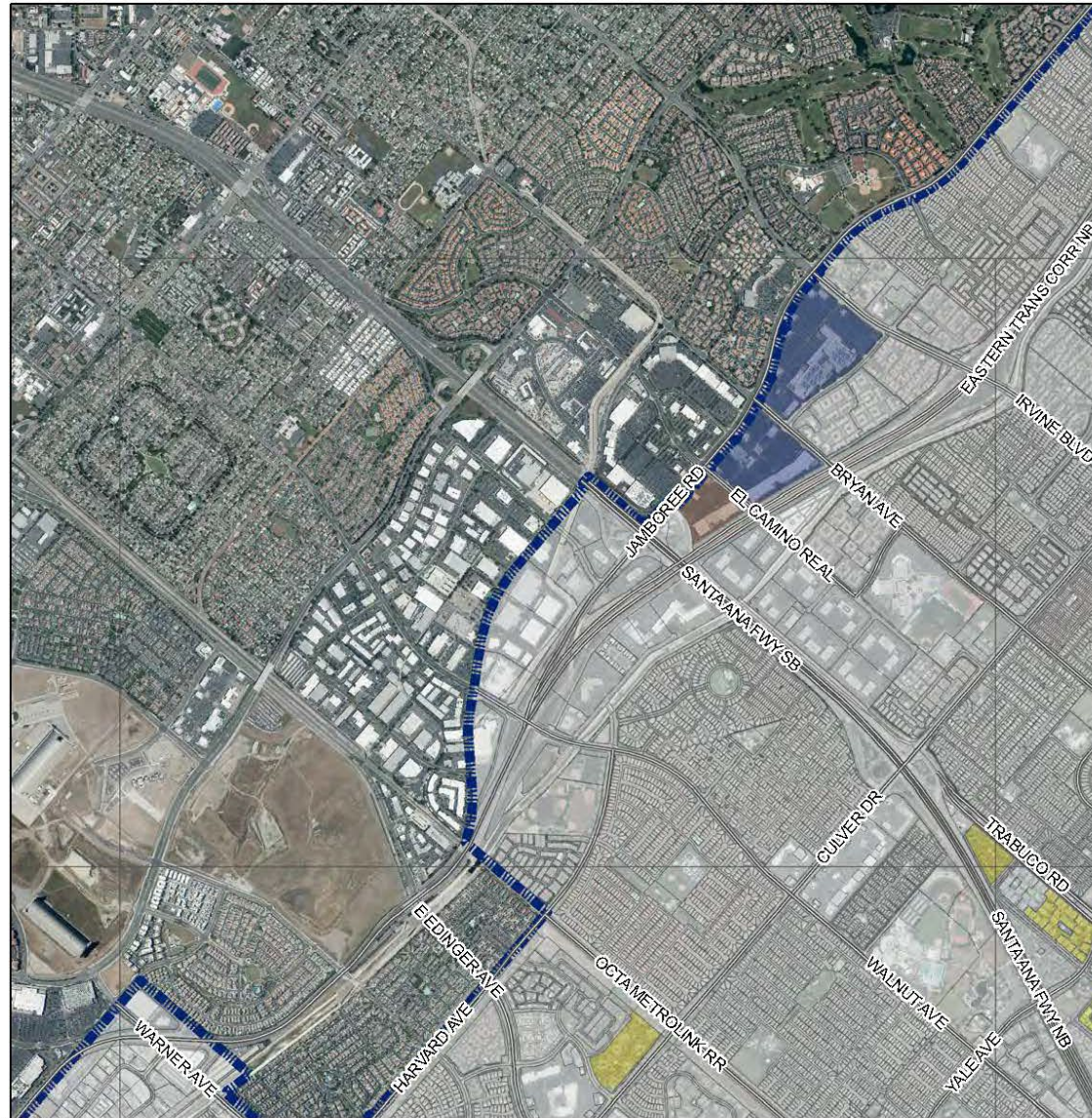
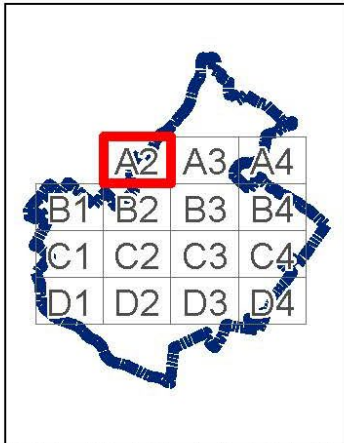
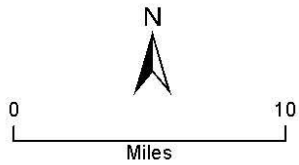
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-26. Sites Inventory Map – A2

### Housing Element Update A2

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

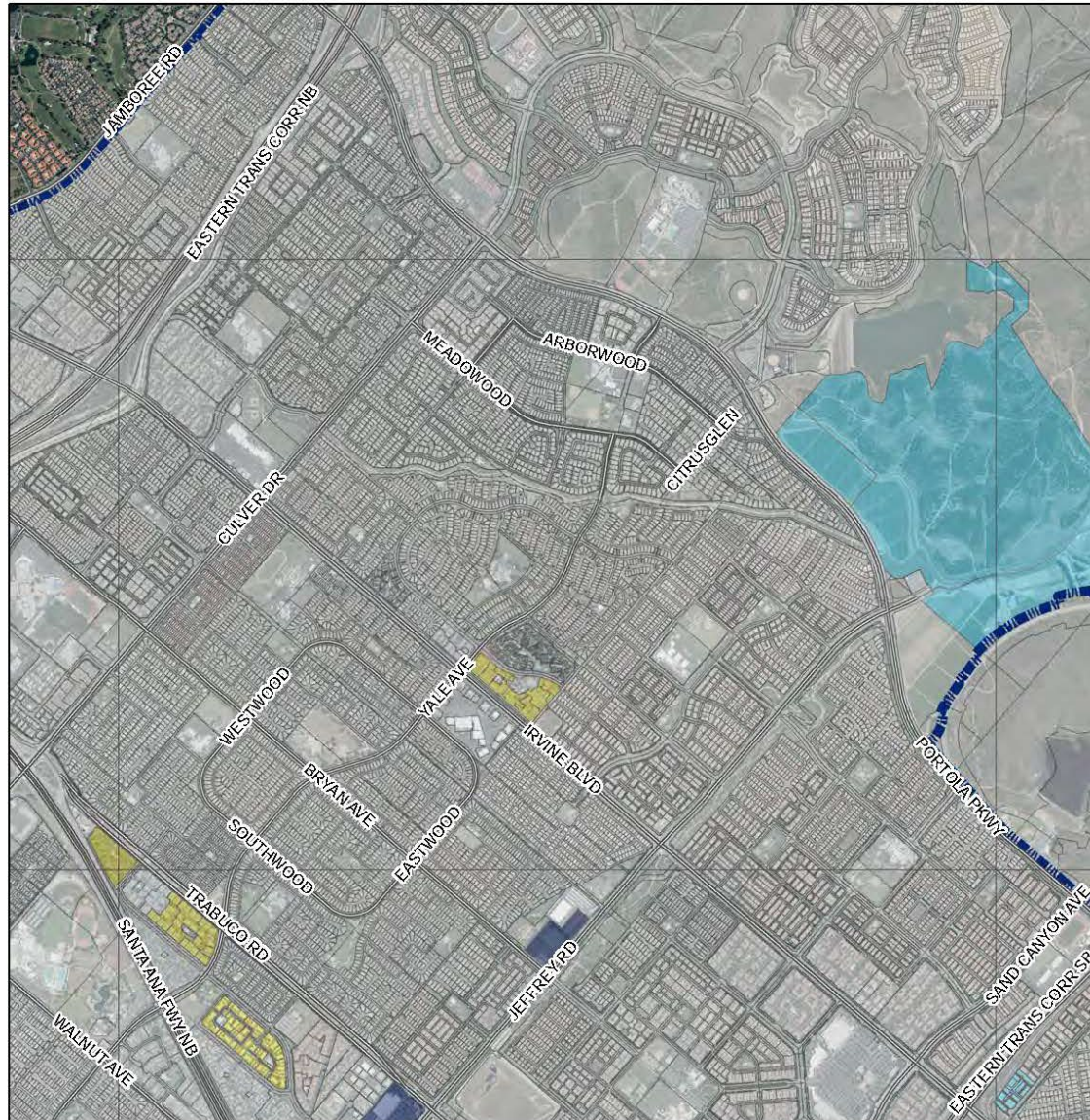
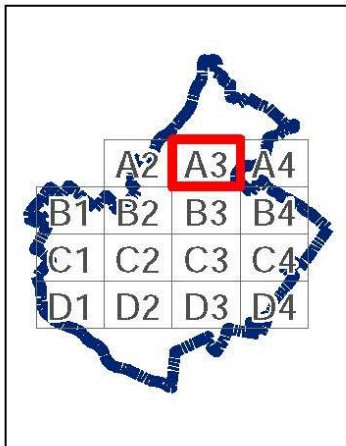
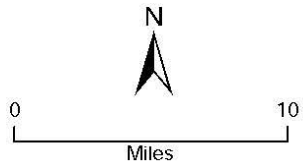
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-27. Sites Inventory Map – A3

### Housing Element Update A3

**Project Type**

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

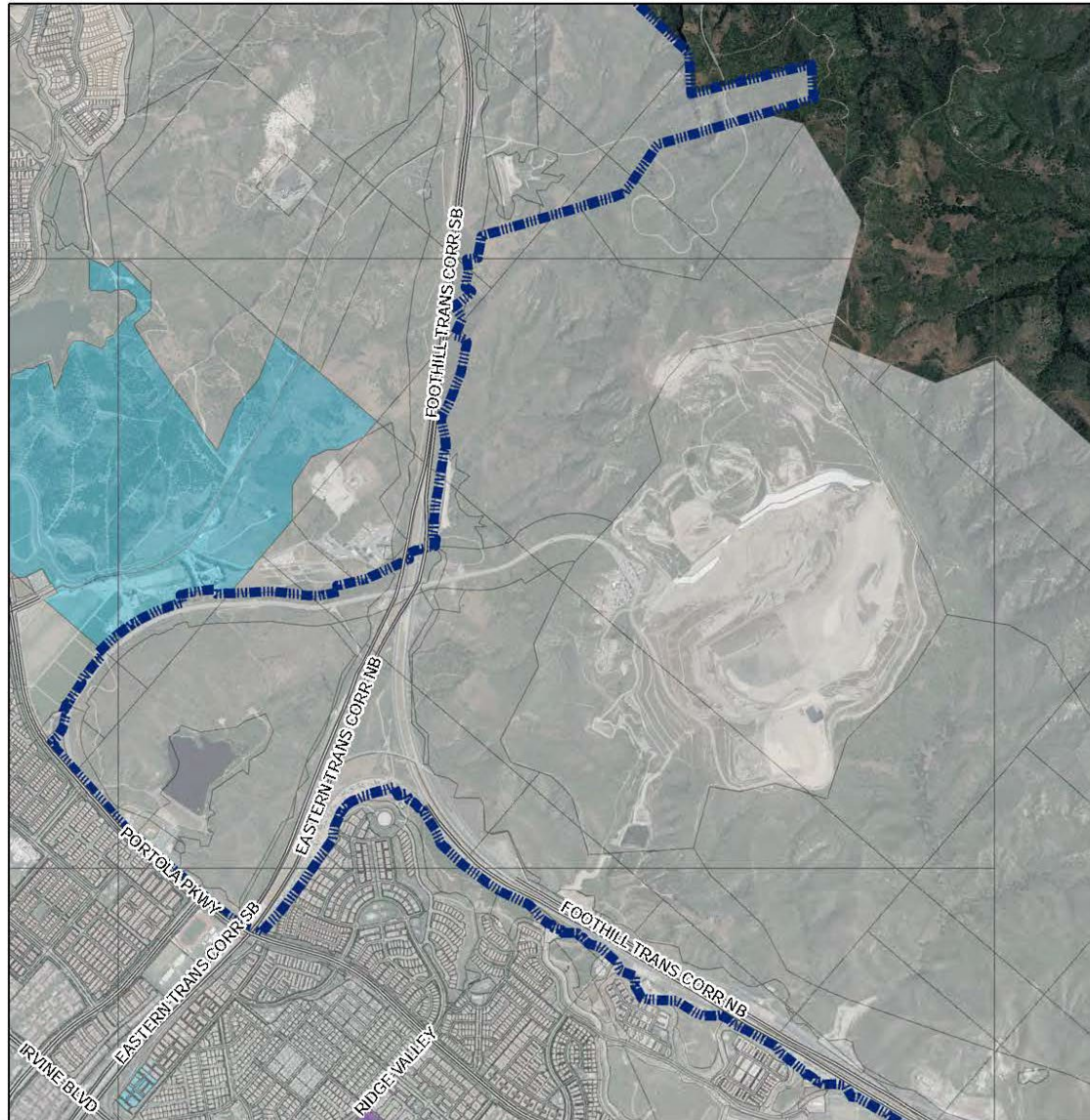
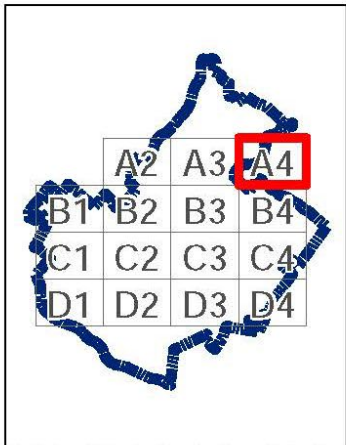
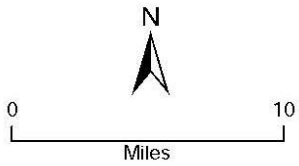
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-28. Sites Inventory Map – A4

### Housing Element Update A4

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

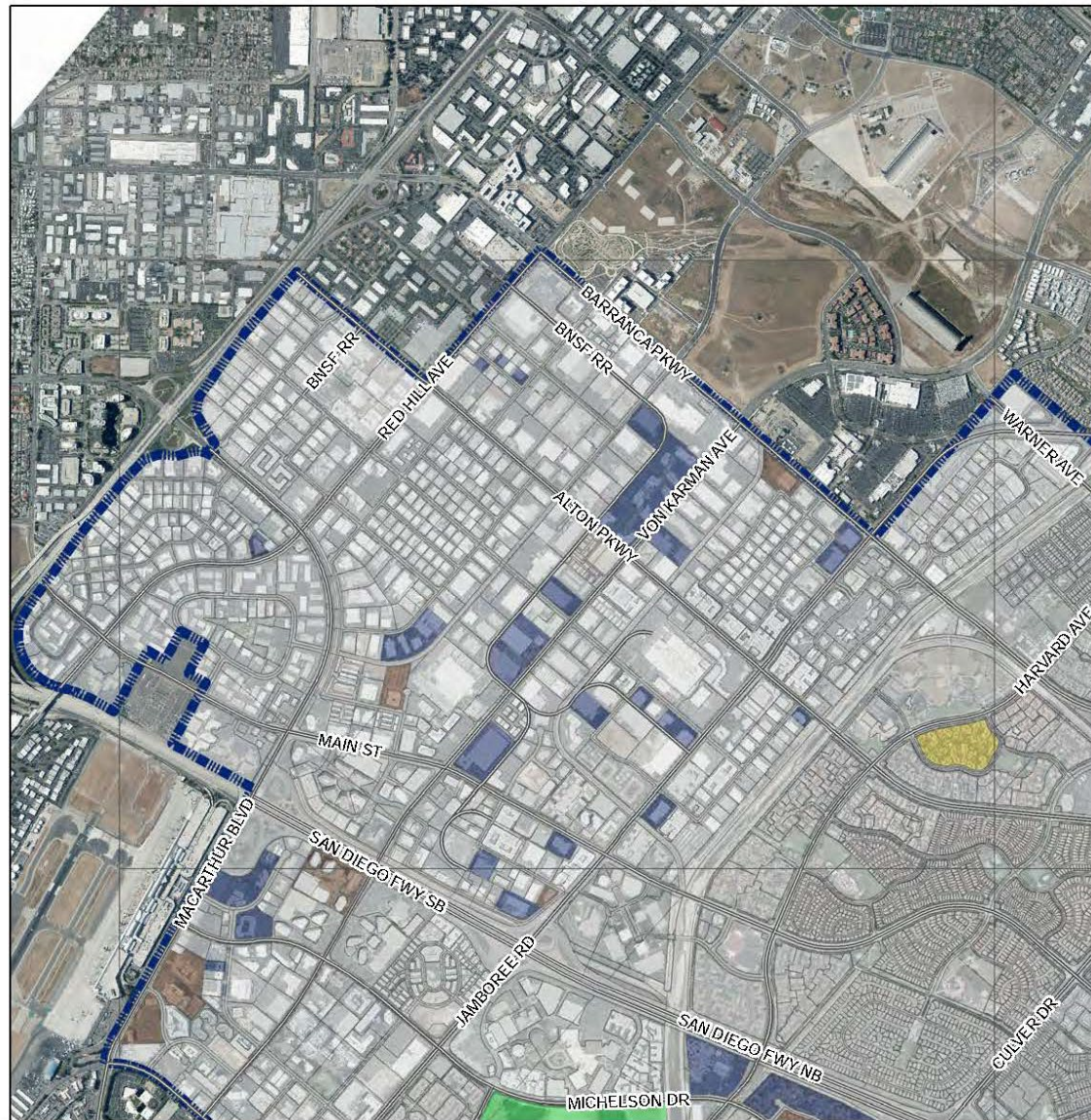
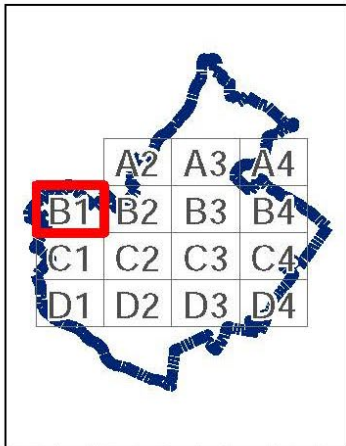
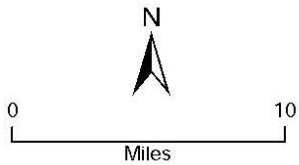
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-29. Sites Inventory Map – B1

### Housing Element Update B1

**Project Type**

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

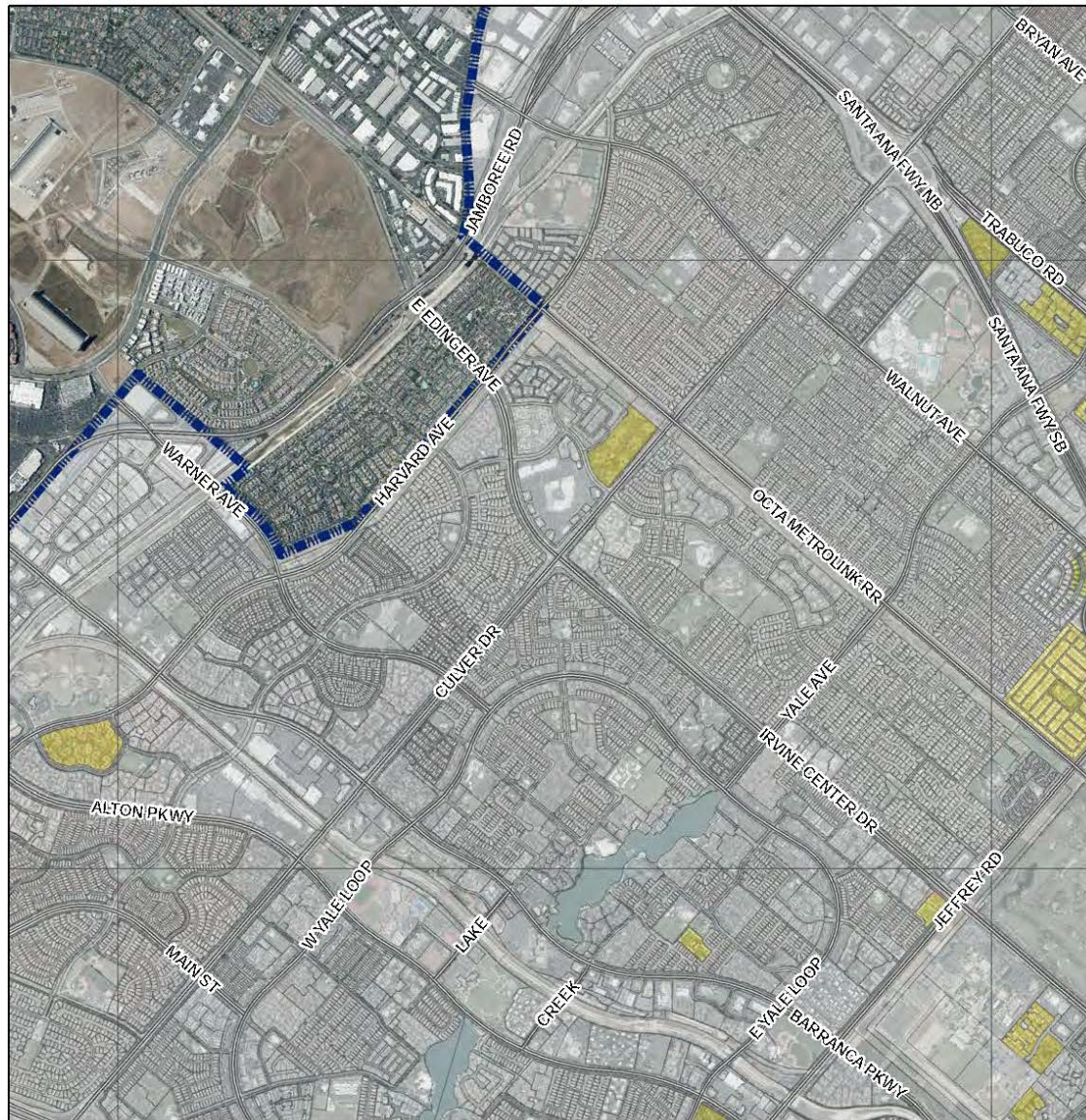
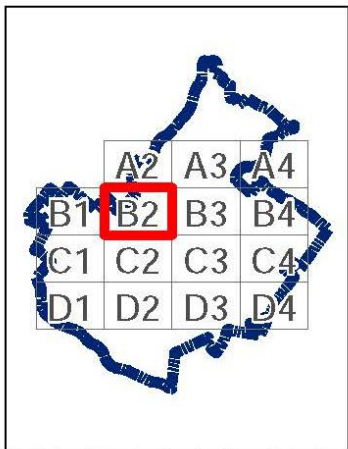
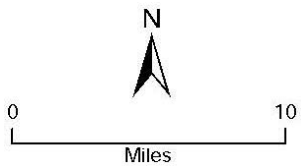
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-30. Sites Inventory Map – B2

### Housing Element Update B2

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

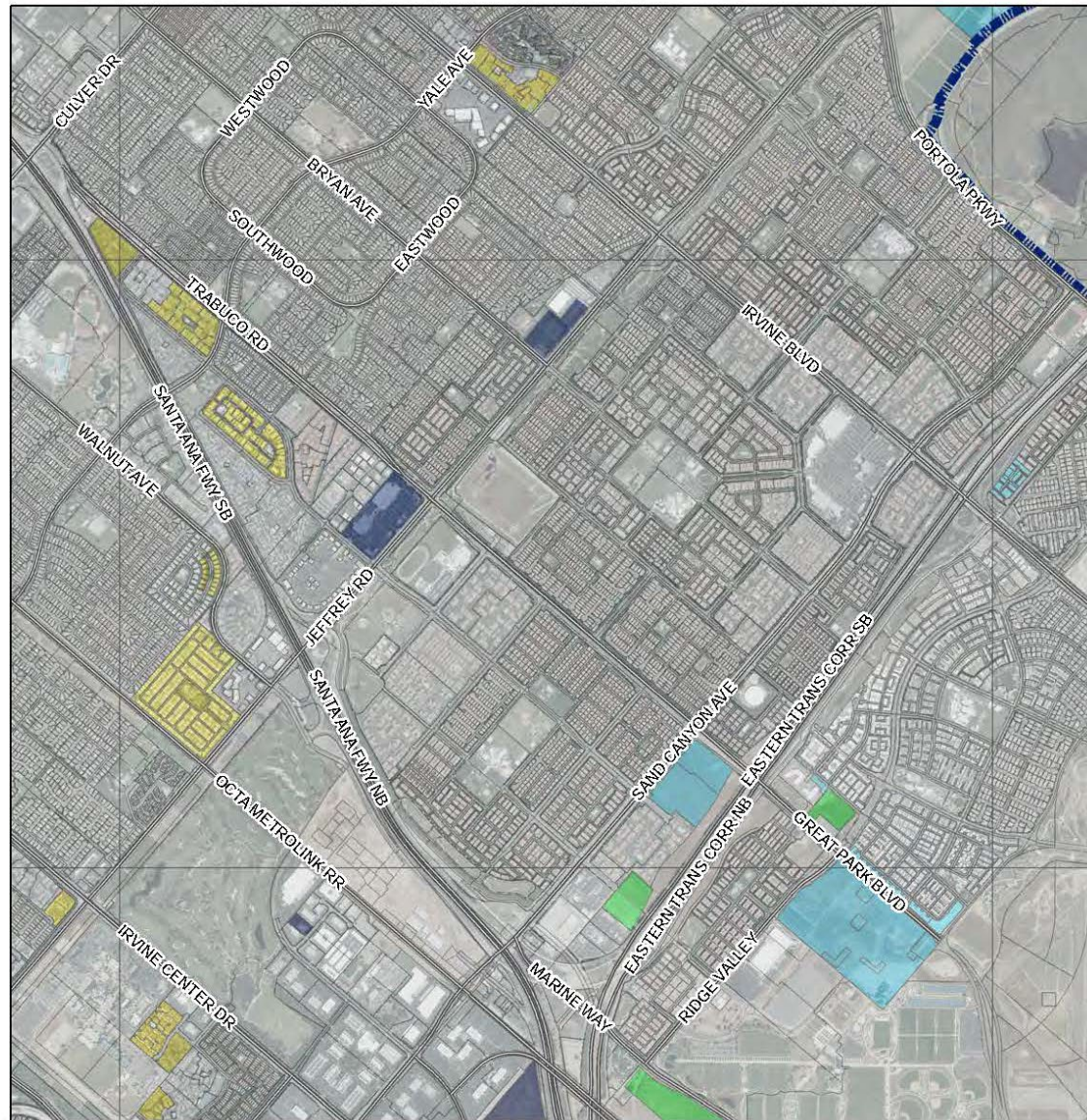
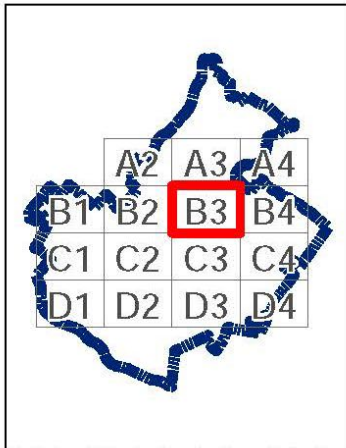
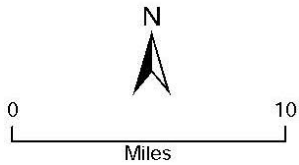
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-31. Sites Inventory Map – B3

### Housing Element Update B3

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

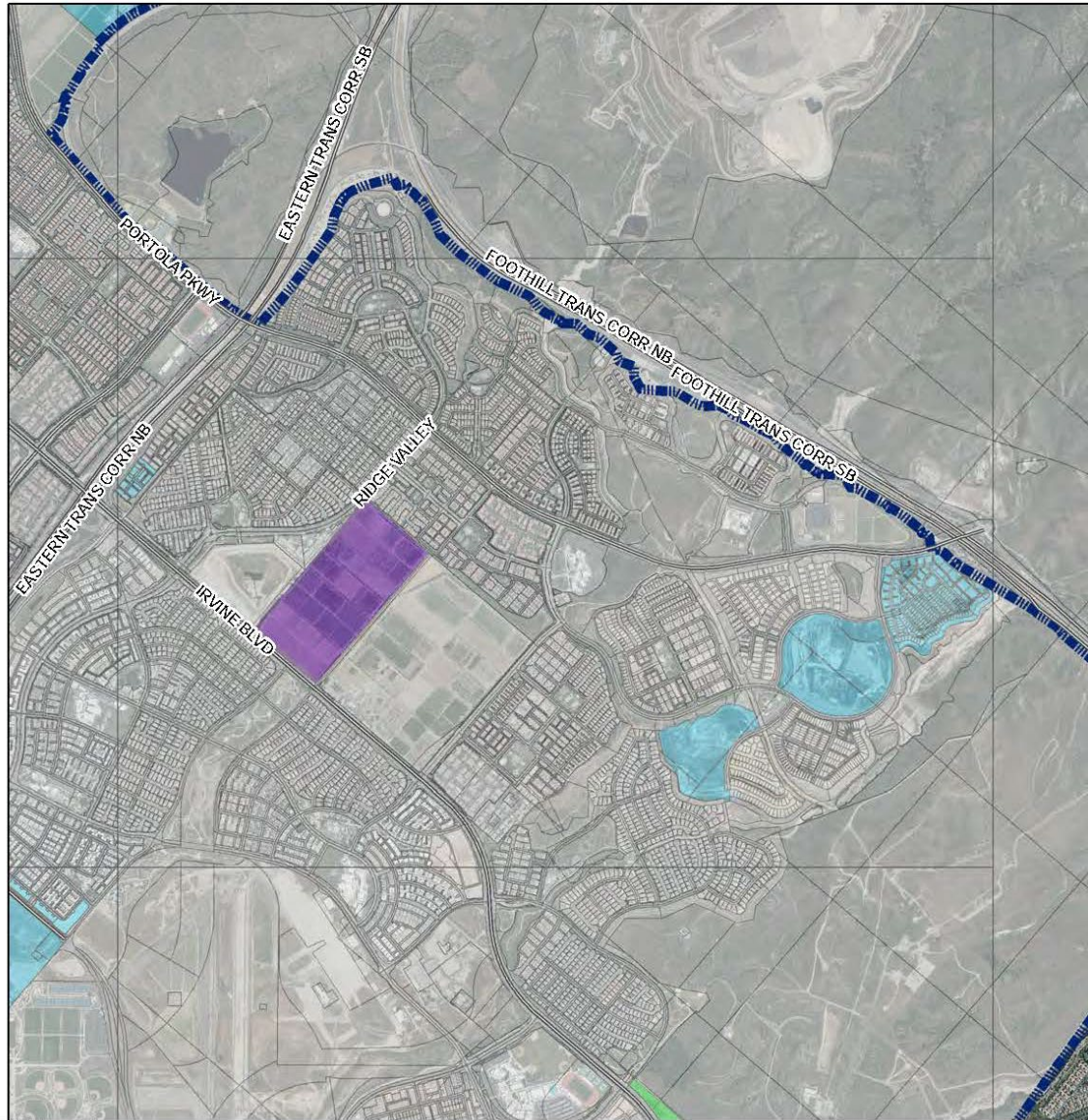
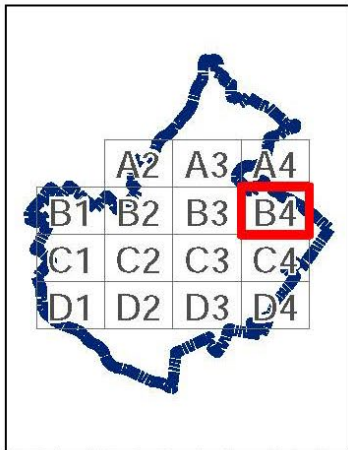
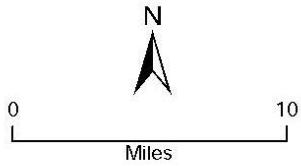
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-32. Sites Inventory Map – B4

### Housing Element Update B4

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

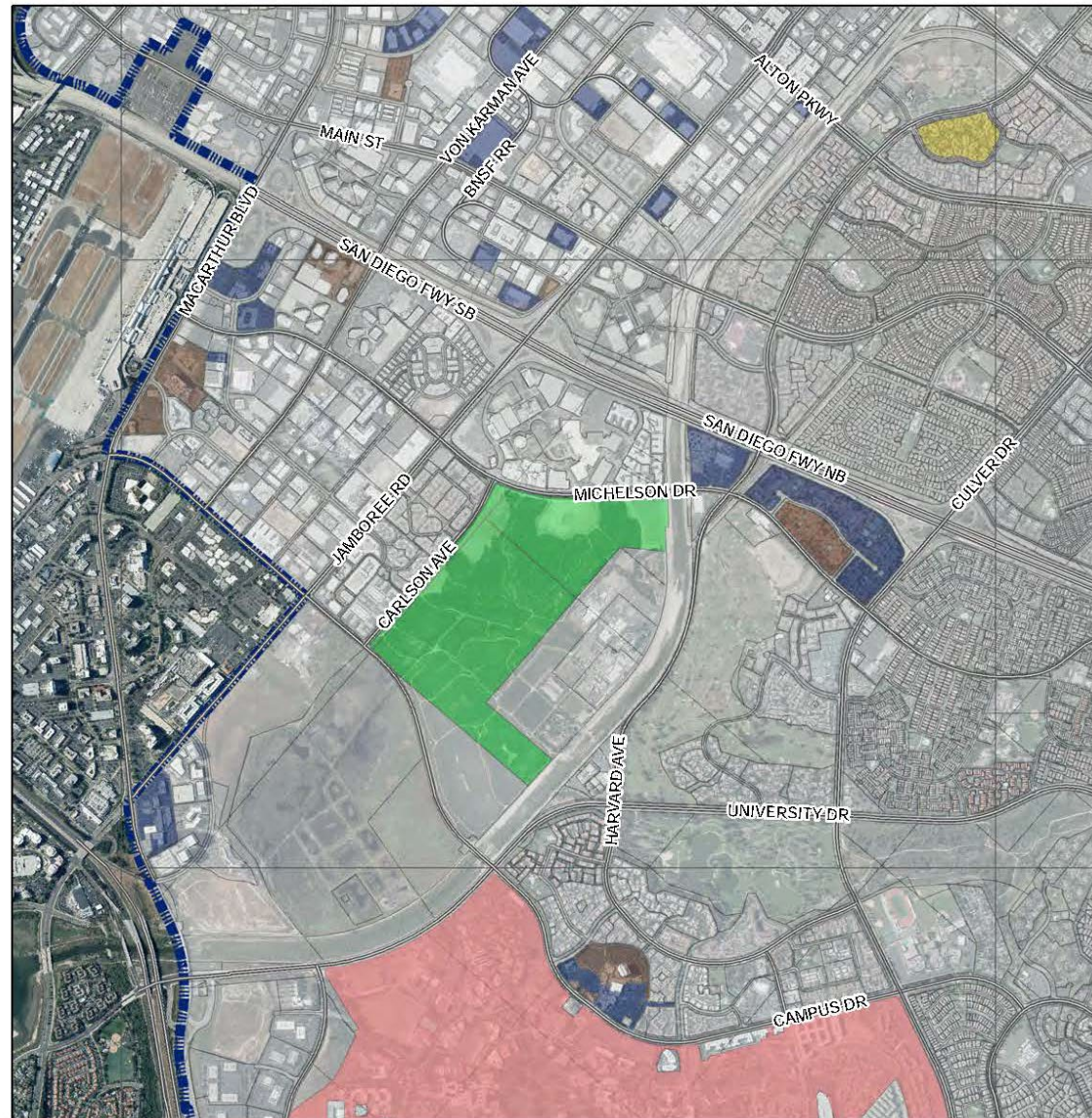
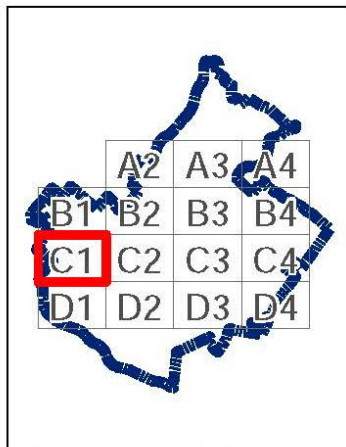
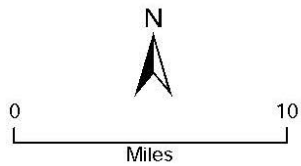
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-33. Sites Inventory Map – C1

### Housing Element Update C1

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

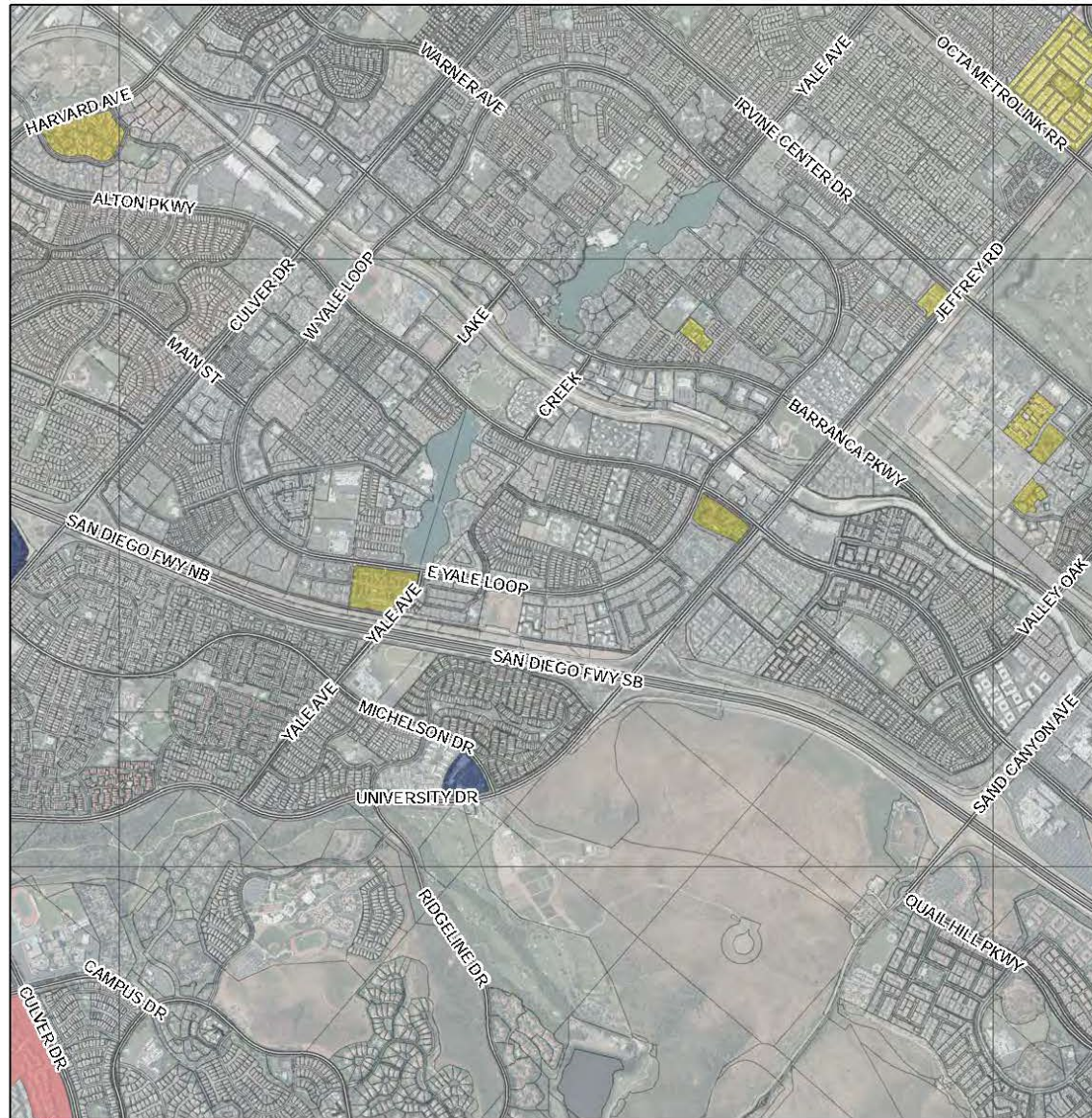
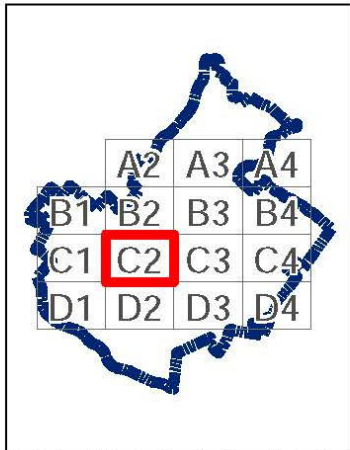
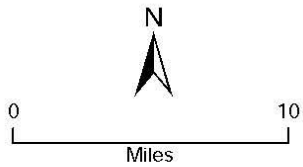
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-34. Sites Inventory Map – C2

### Housing Element Update C2

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

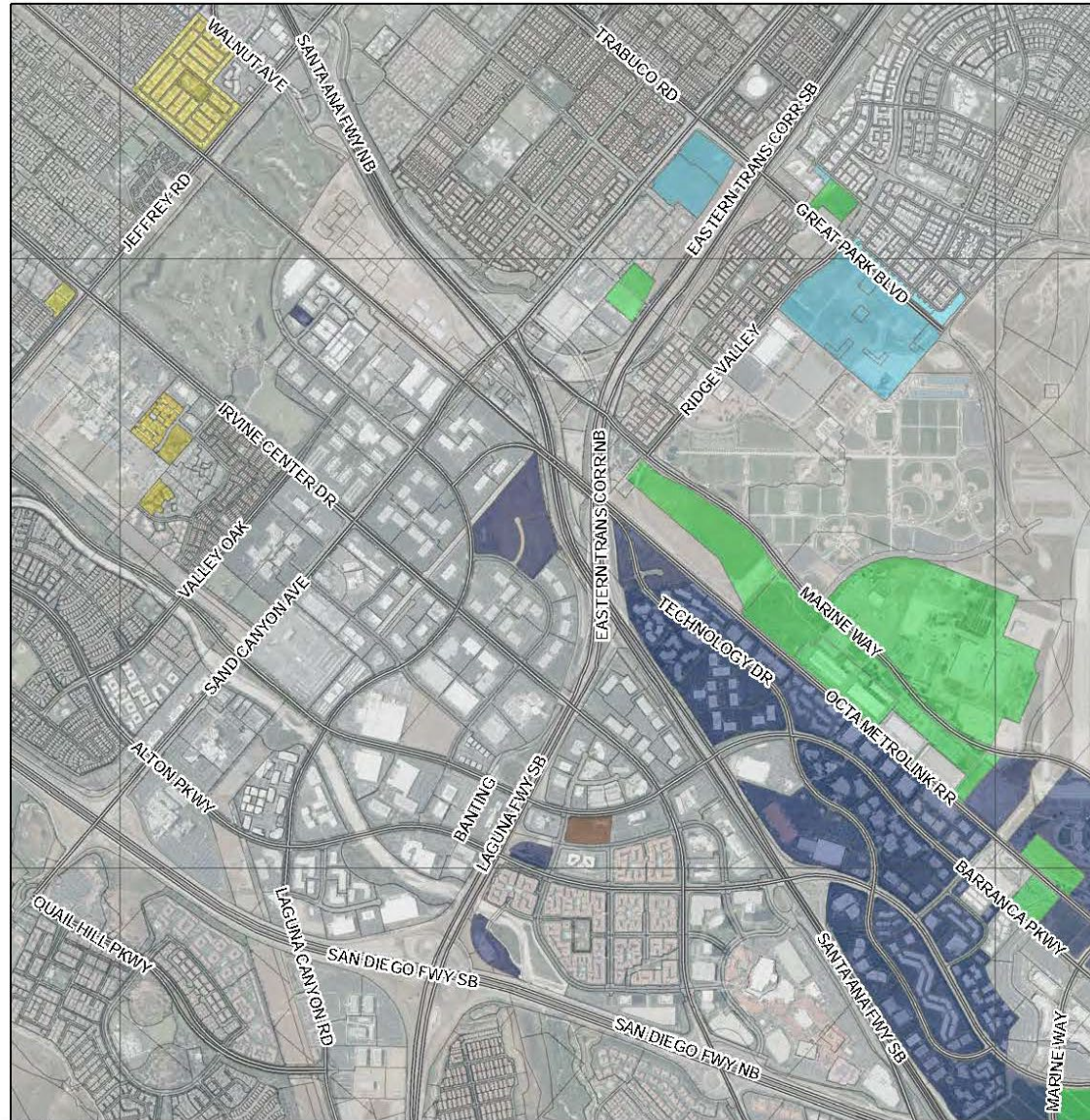
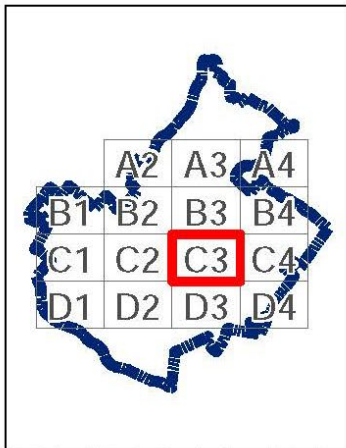
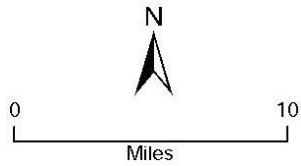
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-35. Sites Inventory Map – C3

### Housing Element Update C3

**Project Type**

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

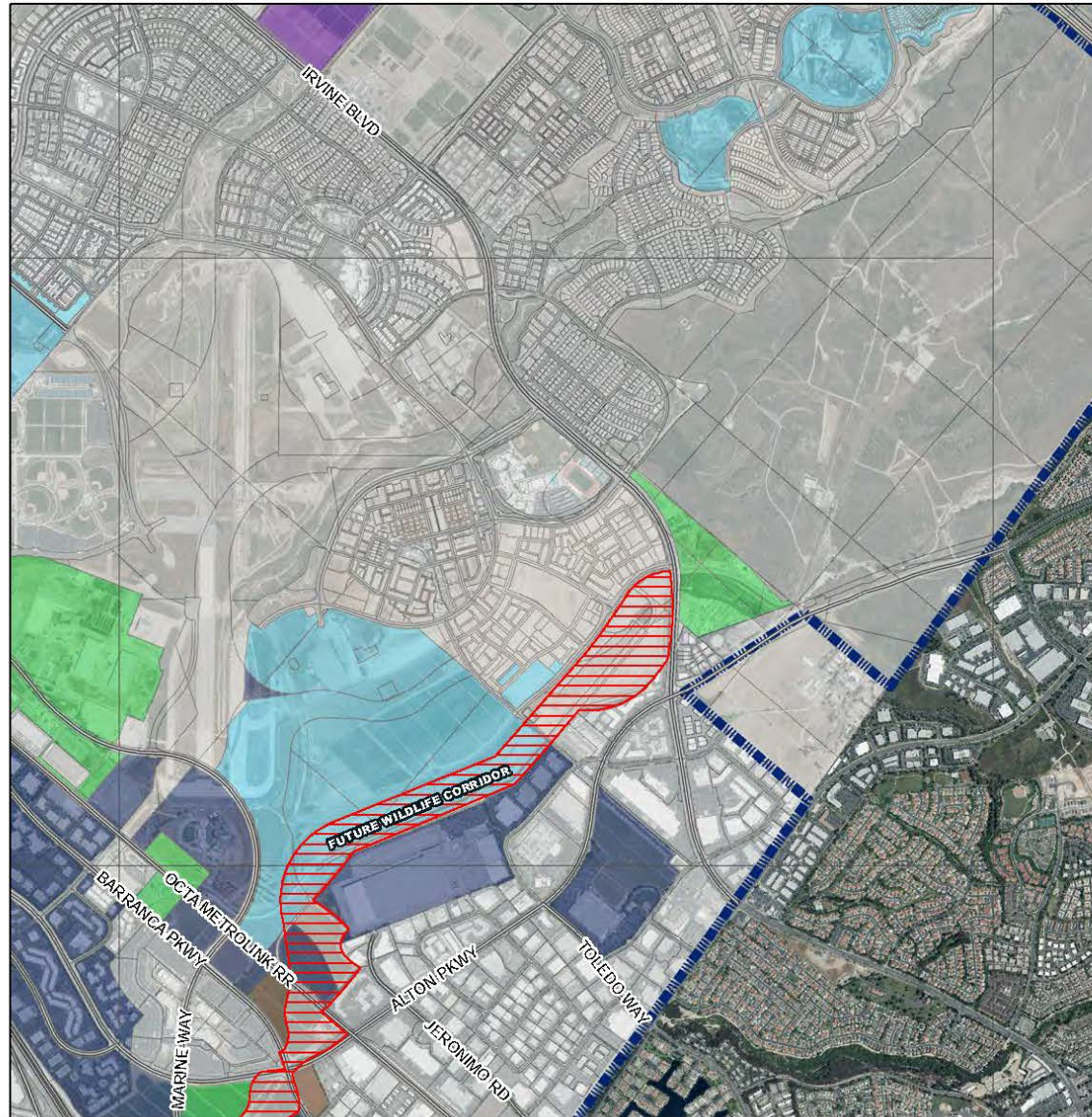
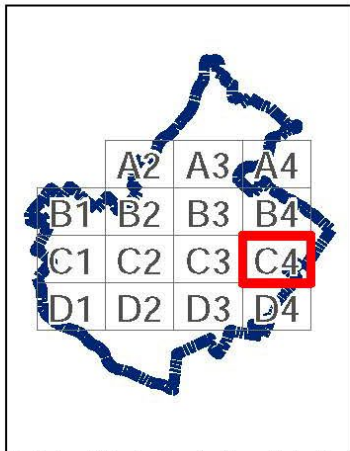
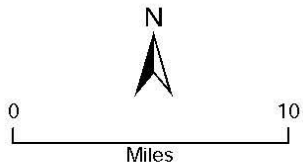
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-36. Sites Inventory Map – C4

### Housing Element Update C4

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

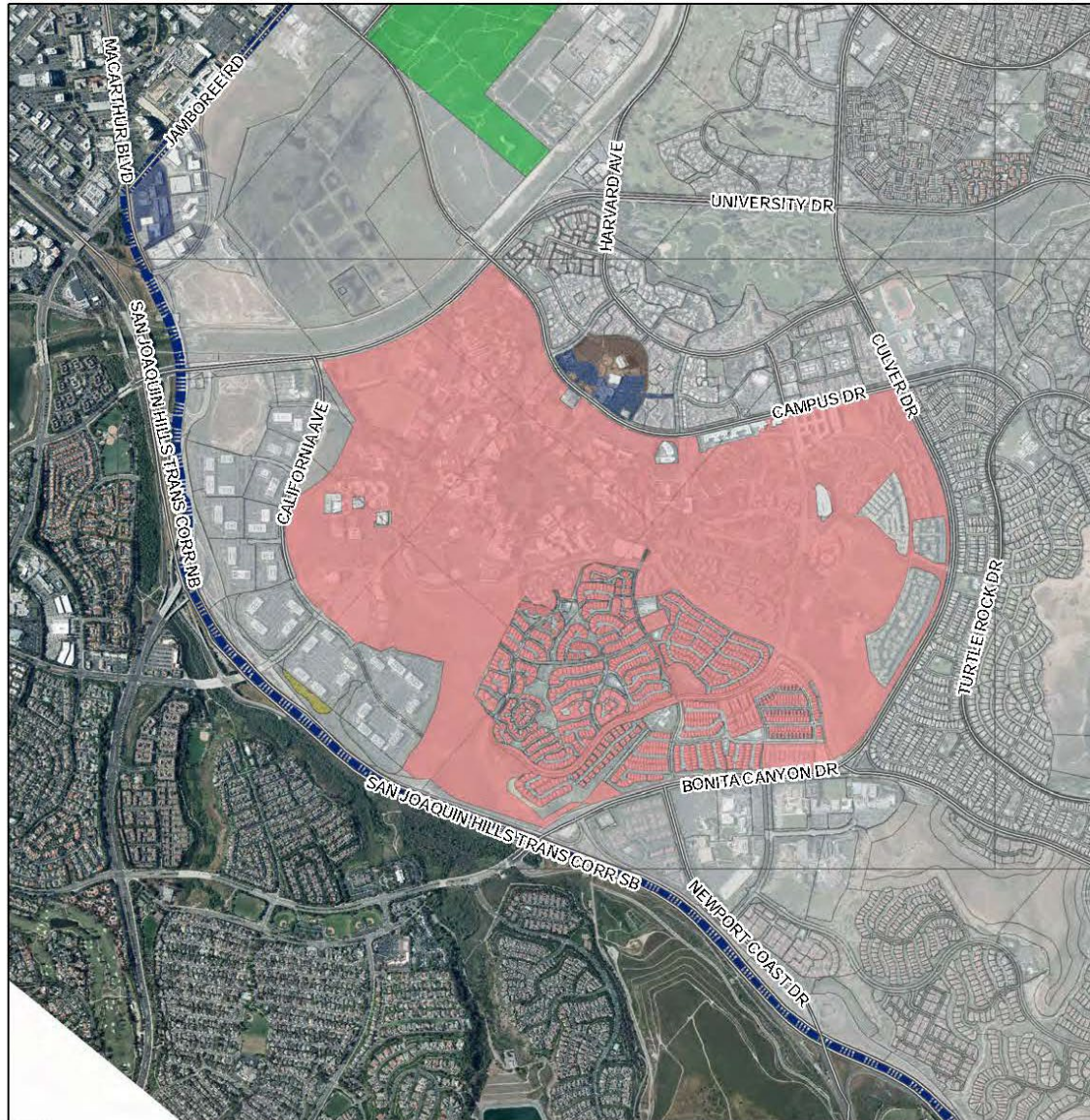
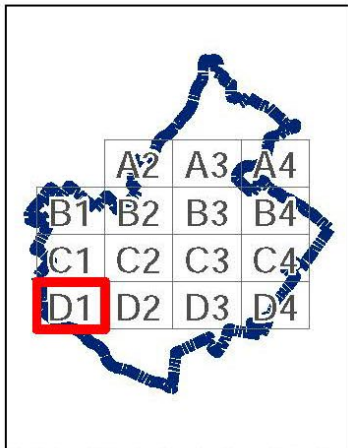
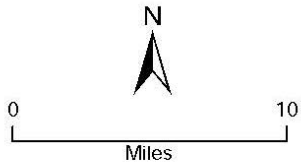
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-37. Sites Inventory Map – D1

### Housing Element Update D1

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

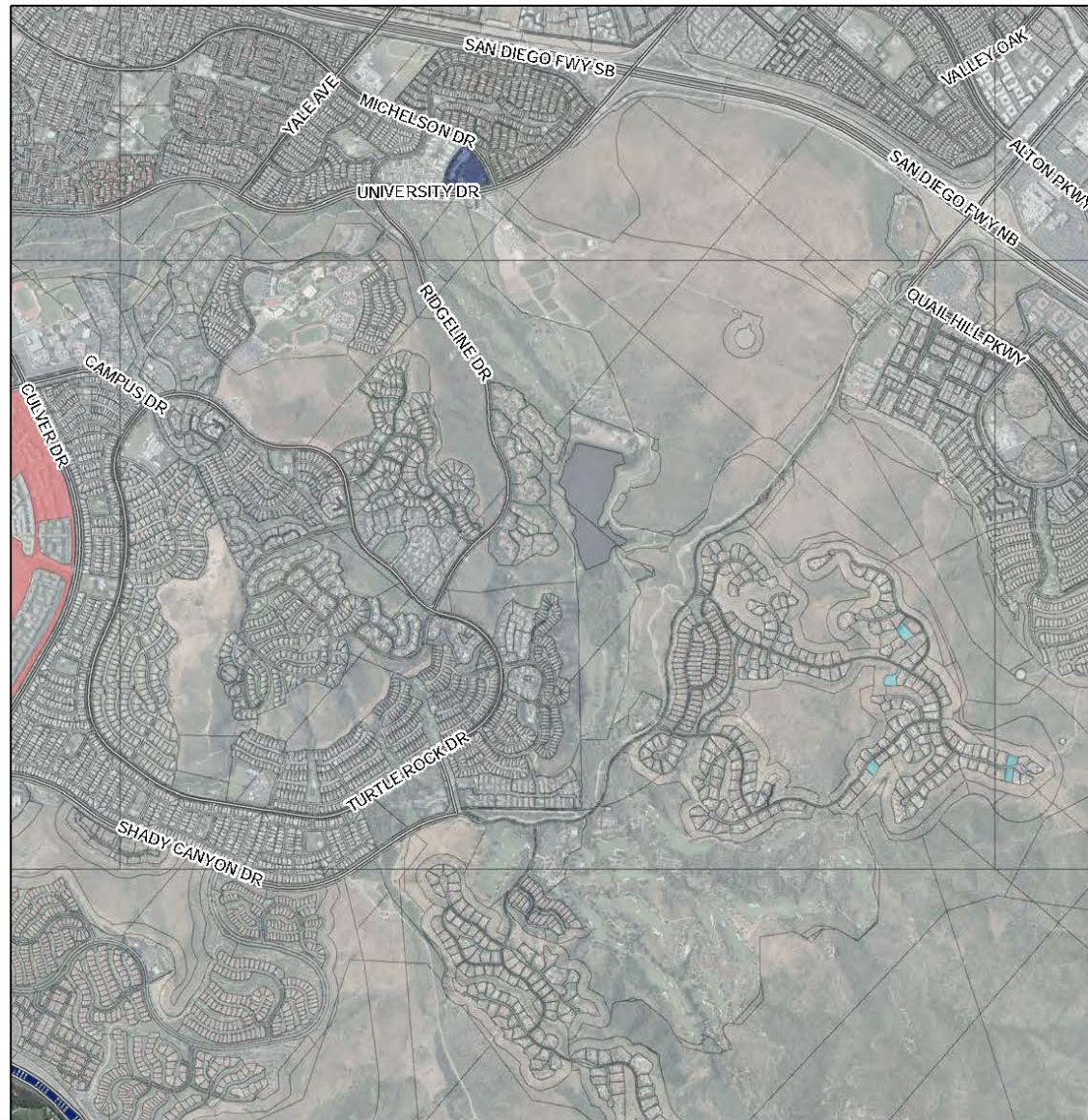
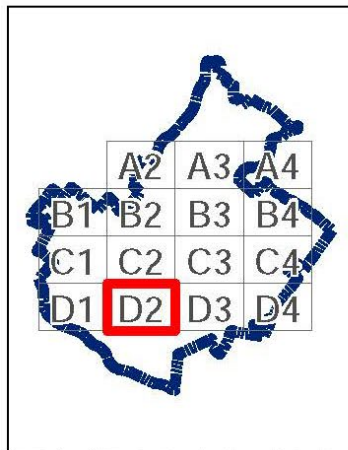
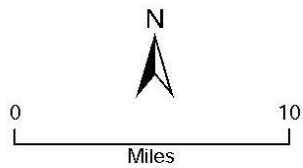
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-38. Sites Inventory Map – D2

### Housing Element Update D2

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

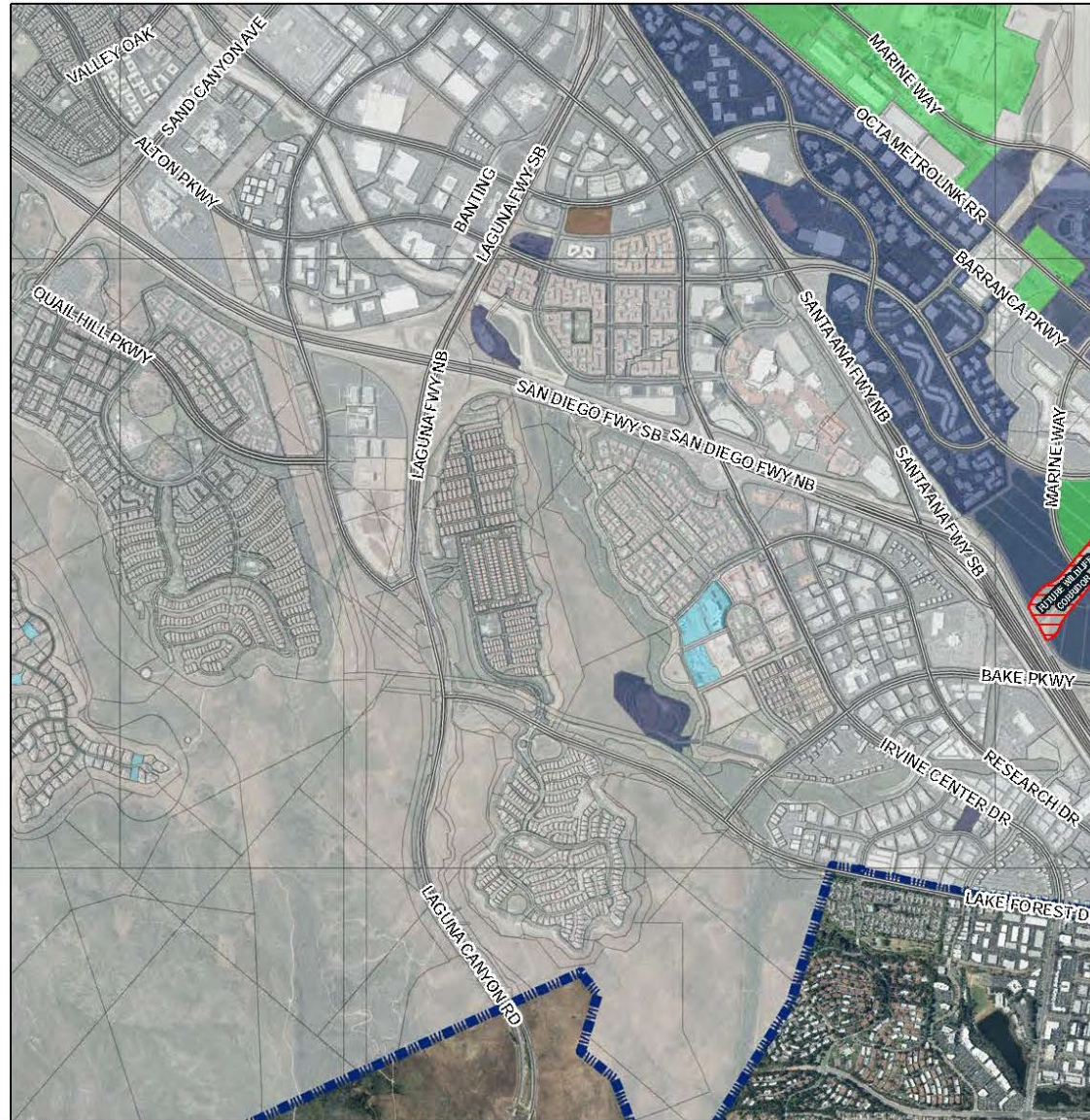
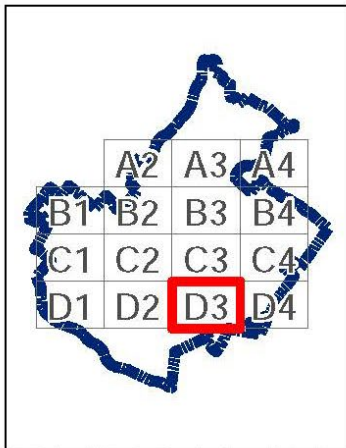
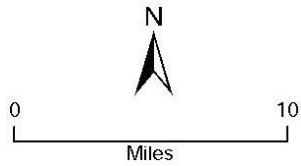
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-39. Sites Inventory Map – D3

### Housing Element Update D3

**Project Type**

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



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# 2021–2029 Housing Element

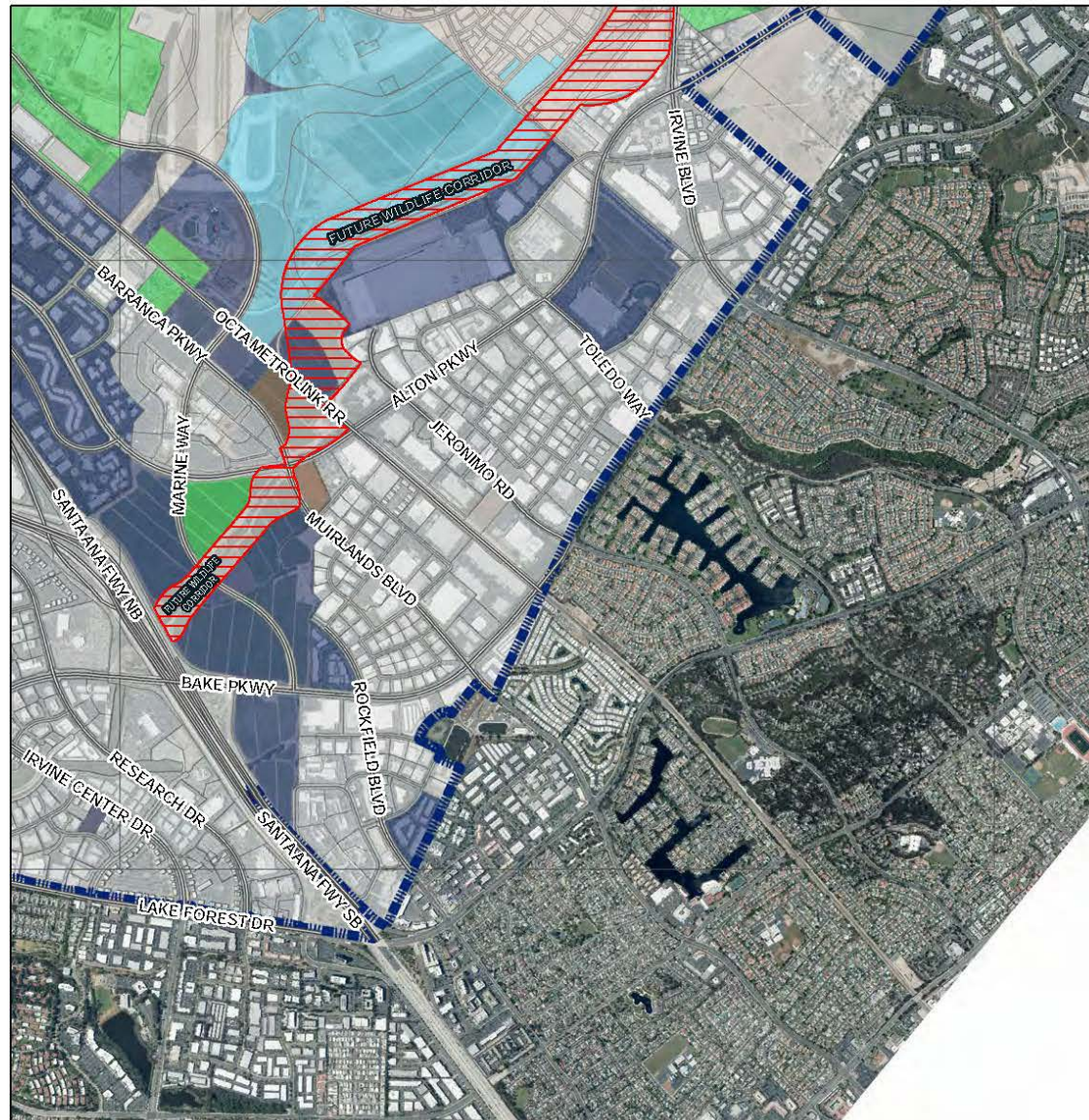
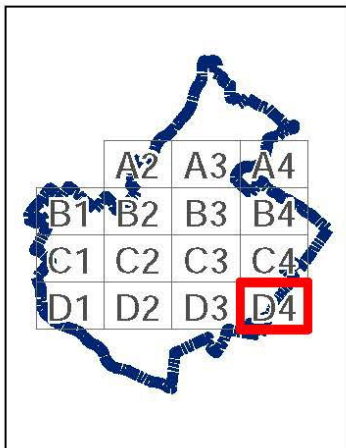
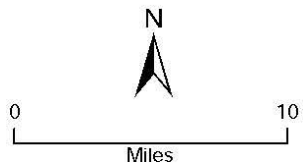
## Appendix B. Affirmatively Furthering Fair Housing Analysis

Figure B-40. Sites Inventory Map – D4

### Housing Element Update D4

#### Project Type

- Affordable Sites
- Publicly Owned Sites
- North Irvine Staff Housing
- Entitled and Pending Projects
- At-Risk Affordable Housing
- University Housing
- No Project Type Designation



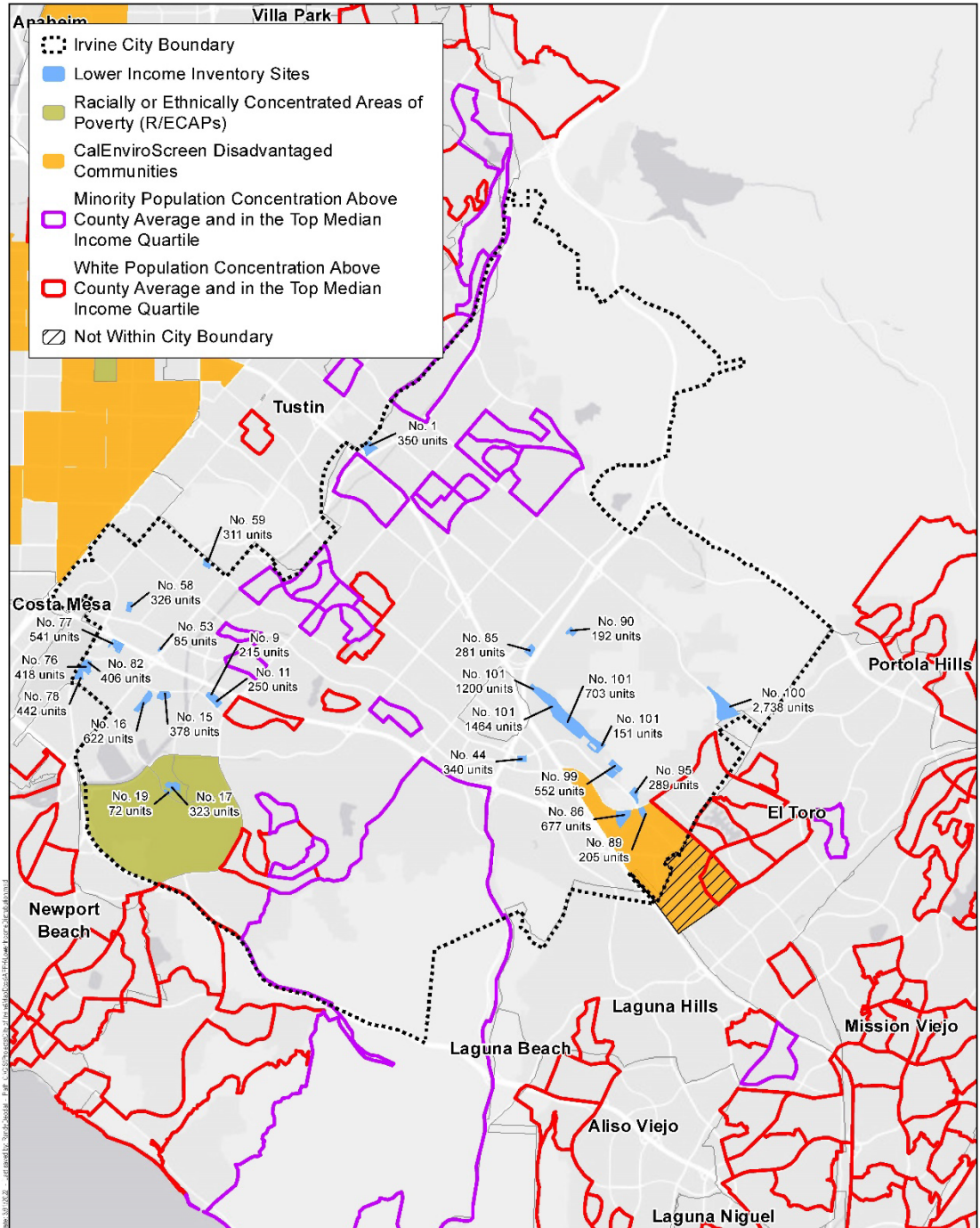
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## Appendix B. Affirmatively Furthering Fair Housing Analysis

**Figure B-41. Sites Inventory Map – Sites with Lower Income Units**



Source: American Community Survey 2014 - 2017; CAOEHHA 2022; HUD 2015.



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# 2021–2029 Housing Element

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