

Appendix H-E:

Affirmatively Furthering Fair Housing (AFFH)

NOTE: Appendix H-E: Affirmatively Furthering Fair Housing replaces former Appendix H-E Assessment of Fair Housing dated November 2021. As such, this section contains no markups or highlights to improve readability.

E Affirmatively Furthering Fair Housing (AFFH)

E.1 Introduction and Overview

In 2018, the California State Legislature passed Assembly Bill (AB) 686 to expand upon the fair housing requirements and protections outlined in the federal Fair Employment and Housing Act. The law requires all State and local public agencies to facilitate deliberate action to explicitly address, combat, and relieve disparities resulting from past patterns of segregation to foster more inclusive communities. AB 686 created new requirements that apply to all housing elements due for revision on or after January 1, 2021. The passage of AB 686 ensures that California Cities affirmatively further fair housing.

AB 686 defined “affirmatively further fair housing (AFFH)” 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.” AB 686 added to the Housing Element requirements an assessment of fair housing which 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
- An identification of fair housing goals and actions.¹

The analysis identified patterns of racial and economic segregation between the neighborhoods in northern Fullerton and southern Fullerton, as well as concerns over displacement, fair housing enforcement, and access to public transportation and resources. This chapter identified actions to address these issues such as promoting integration and development in areas with high resources and tools to combat displacement and discrimination.

E.1.1 Approach to Analysis

This AFFH analysis has been prepared consistent with the California Department of Housing and Community Development (HCD)’s *Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements* which provides guidance on the preparation of housing elements and ensures statutory requirements are satisfied, pursuant to Government Code Section 65583(c)(10).

¹ Housing and Community Development (HCD). 2021. <https://www.hcd.ca.gov/community-development/affh/index.shtml>



This AFFH analysis evaluates fair housing issues on the following topics:

- Fair Housing Enforcement and Outreach Capacity
- Integration and Segregation Patterns and Trends
- Racially and Ethnically Concentrated Areas of Poverty
- Disparities in Access to Opportunity
- Disproportionate Housing Needs
- Other Relevant Factors, including historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing.

For the purposes of this analysis, the city is divided into 33 neighborhoods (Figure E-1). These neighborhoods are based on the Census block group delineations, as well as local knowledge from City staff. Most of the geographic analysis of fair housing issues in Fullerton is based on the HCD AFFH Data Viewer. The Data Viewer relies on information provided by the Census and other data sources at the census tract and block group level. This AFFH addresses impediments through AFFH-specific goals, and actions based on the contributing factors for each identified fair housing issue.

For reference, the E Imperial Hwy/N Harbor Blvd neighborhood is comprised of entirely commercial and industrial uses and does not contain any residential units. However, several sites within this neighborhood have been identified for the Housing Incentive Overlay Zone (HIOZ), which requires a set aside for affordable housing in exchange for increased density. Additionally, the neighborhood of California State University Fullerton (CSUF) is the location of the California State University Fullerton campus, which is adjoining E Chapman Ave/State College Blvd. The large number of students in this area likely factors into the data provided for this neighborhood.

E.1.2 Fair Housing Methodology

The California Government Code Section 65583 (10)(A)(ii) requires Cities and Counties 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 conduct this analysis, the City utilized data from a variety of sources, including:

- The HCD AFFH Data Viewer
- Urban Displacement Project (UDP)
- U.S Department of Housing and Urban Development (HUD)
- CalEnviroScreen
- California Tax Credit Allocation Committee (TCAC)
- County of Orange 2020 – 2024 Five-Year Housing and Community Development Plan (Consolidated Plan)
- The Regional Analysis of Impediments (AI) to Fair Housing Choice for FY 2020-25 for Orange County
- Comprehensive House Affordability Strategy (CHAS)
- US Census American Community Survey (ACS)

Additionally, the analysis includes a discussion of historic land use and segregation patterns and input from sources of local knowledge, including advocates for people with special needs, housing development and advocacy organizations, housing and social services providers, and low-income residents.



E.1.3 Housing and Community Development's AFFH Viewer

The AFFH Data Viewer is a tool developed by HCD that features census block group and tract level data from an expansive collection of sources including ACS, HUD, TCAC, UDP, and CHAS. The Data Viewer tool serves as a resource for local and regional governments and provides the ability to explore spatial data patterns concerning fair housing enforcement, segregation and integration, racially and ethnically concentrated areas of poverty, and disparities in access to opportunities and housing. The Data Viewer is intended to assist in the creation of policies that alleviate disparities, combat discrimination, and increase access to safe and affordable homes.

E.1.4 Urban Displacement Project (UDP)

The UDP was developed to track neighborhood change and identify areas that are vulnerable to gentrification and displacement in California. Indicators of gentrification and displacement are measured at the census tract level based on data from the 2015 ACS. UDP indicators examine census tracts to identify areas that qualify as disadvantaged neighborhoods. Additionally, census tracts identified as disadvantaged neighborhoods by UDP's criteria are further analyzed to explore changes in the percentage of college educated residents, white, non-Hispanic population, median household income, and median gross rents over time to determine levels of gentrification and displacement risk.

E.1.5 CalEnviroScreen

The California Office of Environmental Health Hazard Assessment developed a screening methodology to identify communities disproportionately burdened by multiple sources of pollution. This tool, called the California Communities Environmental Health Screening Tool (CalEnviroScreen), utilizes existing environmental, health, and socioeconomic data to rank census tracts based on 20 distinct indicators. In general, if a community has a high score for that indicator, it is more likely to have greater degree of pollution burden and a higher rate of residents vulnerable to the effects of that pollution exposure as compared to census tracts statewide. Designated disadvantaged communities are those with CalEnviroScreen percentile scores of 75 or higher, meaning that they scored within the highest 25 percent of census tracts for pollution and other social and economic burden indicators across California.

E.1.6 California Tax Credit Allocation Committee (TCAC)

To assist fair housing analysis, HCD and the TCAC created the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and related state agencies/departments to further the fair housing goals.² The California Fair Housing Task Force 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. Opportunity mapping is a way to measure and visualize place-based characteristics linked to critical life outcomes, such as educational attainment, earnings from employment, and economic mobility.² Opportunity Maps reflect composite scores of three different domains made up from a set of indicator data shown in Table E-1.

²Office of The State Treasurer (STO). 2021. <https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf>



Table E-1 Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty, Adult Education, employment, Job proximity, median home value
Environmental	CalEnviroScreen 3.0 pollution indicators and values
Education	Math proficiency, reading proficiency, high school graduation rates, student poverty rates

Source: California Fair Housing Task Force, Methodology for the 2020 TCAC/HCD Opportunity Maps, December 2020

E.1.7 2020-2024 Five-Year Housing and Community Development Strategic Plan for Orange County (Consolidated Plan)

The HUD Consolidated Plan is used by the federal government, states, and local jurisdictions to assess affordable housing and community development needs and is a required document for jurisdictions to be eligible for federal HUD grant programs. Orange County is required to submit a federally mandated Consolidated Plan every five years and submit an Annual Action Plan in order to receive its annual Community Development Block Grant (CDBG) entitlement grant. The Consolidated Plan assesses Orange County’s affordable housing and community development needs through a housing market analysis; articulating priorities, goals, and strategies to address identified needs; and describing the actions that need to be taken to implement strategies for housing and community development including public services and city infrastructure. Orange County’s Consolidated Plan comprises of four priority needs: Affordable Housing Needs, Quality of life, Public Services, and Planning and Administration. The Consolidated Plan was approved on June 23, 2020. As identified by HUD, Fullerton received \$1,312,305 in CDBG funds and \$576,341 in Home Investment Partnerships (HOME) funds. These amounts represent the approximate annual allocation that the City of Fullerton receives for general administration, community development, and affordable housing development.

E.1.8 2020 Orange County Regional Analysis of Impediments to Fair Housing Choice (AI)

As part of the CDBG program certification process and prior to HUD’s reinstatement of the AFFH standards in 2020, participating jurisdictions prepared an analysis of impediments to fair housing choice every five years. The Orange County Regional Analysis of Impediments to Fair Housing Choice (AI) was a countywide effort to pool resources and combine efforts to identify discrimination and increase fair housing choices for residents across the county. It was produced in collaboration by Orange County jurisdictions, including the City of Fullerton. The AI addresses fair housing issues on both a countywide level and in each jurisdiction. The AI provides an assessment of the regional laws, ordinances, statutes, and administrative policies, as well as local conditions that affect the location, availability, and accessibility of housing. It also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person’s access to housing and provides solutions and measures to mitigate or remove identified impediments.

E.1.9 HUD Comprehensive Housing Affordability Strategy (CHAS) Data

Each year, HUD receives custom tabulations of ACS data from the U.S. Census Bureau. This data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrates the extent of housing problems and housing needs, particularly for low-income households. CHAS data is estimated by the number of households that have certain housing problems and have income low enough to qualify for HUD’s programs (primarily 30, 50, and 80 percent of median income). It is also important to consider the



prevalence of housing problems among different types of households, such as seniors, people with disabilities, minorities, and different household types.

E.1.10 AllTransit

AllTransit is an online database that details transit opportunities for communities. The website explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. The AllTransit performance score explores metrics that reveal the social and economic impact of transit, such as connectivity, access to jobs, and frequency of service.

E.2 Analysis of Impediments Findings

The AI provides a demographic profile of Orange County, assesses the extent of housing needs among specific income groups, and evaluates the availability of a range of housing choices for residents. The AI addresses disparities in housing needs, existing patterns of segregation and racially/ethnically concentrated areas of poverty (R/ECAPs) and contributing factors to fair housing impediments.

Regional Trends

The AI identifies the following impediments to fair housing in Orange County:

- Residential segregation between white residents and non-white residents has increased between 2010 and 2020.
- Supply of affordable housing is insufficient to meet the county's housing needs.
- Affordable housing and accessible housing for people with disabilities is concentrated in the central and northern portions of the county, particularly in the cities of Anaheim, Garden Grove, Irvine, and Santa Ana.
- White, non-Hispanic residents exhibit the highest exposure to educational opportunity and non-Hispanic Asians as the second-highest. Hispanics have the lowest access to these opportunities, with Black, non-Hispanic residents in between.
- White, non-Hispanic residents exhibit the highest access to environmentally healthy neighborhoods. All other racial/ethnic groups obtain lower environmental health access scores: Hispanic resident score lowest, followed by Black, non-Hispanic residents, Asian/Pacific Islander non-Hispanic residents, and Native American, non-Hispanic residents.
- There are significant disparities in economic opportunity scores across racial/ethnic groups. White, non-Hispanic residents have the greatest access to economic opportunity. Asian and Pacific Islander residents, Native Americans, and Black residents have lower economic opportunity scores. Hispanic residents have the lowest access to economic opportunity of all racial and ethnic groups in Orange County.
- Areas with high access to opportunity tend to have predominant populations of white and Asian, non-Hispanic residents. Areas with low access to opportunity tend to have higher percentages of Black and Hispanic residents.
- Black and Hispanic residents are more likely to have at least one housing problem, which includes overcrowding, severe overcrowding, cost burden, and severe cost burden. White and Asian and Pacific Islander residents have slightly lower rates of housing problems.



- No public housing is located in the county In the broader Southern California Association of Governments (SCAG) region, which includes Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura Counties, public housing is concentrated in the cities of Long Beach and Los Angeles, particularly in South East Los Angeles.
- Communities with higher concentrations of persons with disabilities are more likely to be areas that are also more racially and ethnically diverse such as the northern portion of the county, than they are in the less diverse southern portion of the county.
- Overcrowding in Orange County is very high, with 9.5 percent of all households being overcrowded, compared to the state average of 8.2 percent. The rate of overcrowding is highest among Hispanic households.
- Community opposition to affordable housing is prevalent throughout Orange County.
- White mortgage applicants are more likely to have their loan applications result in originated loans. White and Asian borrowers are least likely to be given a high-cost loan. Meanwhile, Black residents are nearly twice as likely to receive subprime loans than white, non-Hispanic residents and Hispanic residents are nearly 2.5 times more likely.

Concentrations of Lower- and Moderate-Income Earning Populations

HUD defines a Lower and Moderate Income (LMI) area as a census tract or block group where over 51 percent of the population earn an income that is considered lower or moderate relative to the area median income (AMI). For Orange County, the AMI is \$ 127,800 for a household of four residents. In Fullerton, households with low and moderate incomes are concentrated in the southern portion of the city.

Language Barriers

A language barrier can be an impediment to accessing housing. Those who do not speak English may face discrimination, communication challenges while trying to obtain housing, and barriers to accessing services and information. According to the AI, 20 percent of city residents aged five and older in Fullerton had Limited English Proficiency (LEP), with Spanish being the most commonly spoken language other than English, followed by Korean, Chinese, and Vietnamese. This is comparable to the LEP percentage in Orange County (21 percent).

Lending by Race/Ethnicity

The Fair Housing Act prohibits discrimination when obtaining a mortgage. However, in Fullerton the lending pool is not representative of the demographics of a community and disparities in loan approvals are an impediment to fair housing.

Limiting Community Opposition

Communities play a significant role in the development of housing in the city. According to the AI, opposition towards multifamily housing and housing for the homeless and affordable housing contributes to disproportionate housing needs in Fullerton and Orange County.



E.3 Fair Housing Resources

E.3.1 Enforcement and Outreach Capacity

Fair housing enforcement and outreach capacity is the ability of a local jurisdiction and fair housing agencies to provide fair housing and tenants' rights information to community members. Enforcement and outreach capacity also includes the ability to address compliance with fair housing laws, such as investigating complaints, resolving issues, and conducting fair housing testing.

Regional Resources

Orange County contracts with The Fair Housing Council of Orange County (FHCOC), a private non-profit fair housing group, to administer a wide variety of fair housing services to residents of Orange County, including residents in Fullerton.

The FHCOC provides the following services to Orange County residents:

- Serving as a fair housing resource for the region, including implementation of an affirmative fair housing marketing plan, testing, and complaint verification
- Responding to all citizen complaints regarding violation of fair housing laws
- Providing tenant-landlord counseling to all inquiring citizens
- Promoting community awareness of tenant-landlord rights and responsibilities
- Reporting monthly on complaint processing
- Providing fair housing education to residents, County staff, community organizations, agencies, and service providers
- Increasing the supply of affordable housing in high opportunity areas
- Preventing displacement of low- and moderate-income residents, seniors, and people with disabilities
- Increasing community integration for persons with disabilities
- Ensuring equal access to housing for persons with protected characteristics who are disproportionately likely to be lower-income and to experience homelessness
- Expanding access to opportunities for protected classes

During the 2015-2019 reporting period, the FHCOC staff received 363 allegations of housing discrimination and opened 179 cases where the allegations seemed sufficiently meritorious to warrant further investigation and/or action. FHCOC also conducted 362 systemic onsite tests, 51 tests occurring in the jurisdiction, and 215 other testing activities. FHCOC held 32 training sessions for rental property owners/managers and presented 16 fair housing seminars and 70 general fair housing workshops. On a regional basis, activities provided by FHCOC included assisting 7,664 unduplicated households addressing 24,766 issues, disputes and/or inquires.

The FHCOC ensures that the City's fair housing practices are consistent with State law and that residents have the tools and resources they need to address fair housing issues appropriately. The City relies on the FHCOC to track, monitor, and investigate fair housing cases as well as hold training sessions for property owners/managers.



In addition to the FHCOC, there are several agencies that have historically provided fair housing services in Orange County, listed in Table E-2. These organizations and provide the following services:

- Fair housing testing and complaints
- Fair housing counseling and education
- Tenant/landlord counseling and mediation
- Homeless prevention program
- Rental assistance program
- Rent/deposit grant program
- Homeseeking services
- Shared housing counseling placement
- Homebuyers’ education learning program

Table E-2 Fair Housing Service Providers Active in Orange County

Organization ¹	Website	Phone Number
Lutheran Social Services of Southern California	https://www.lsssc.org/	(714) 685-1800
Korean Resource Center	https://www.krcla.org/	(714) 869-7624
GreenPath Financial Wellness	https://greenpath.com/	(833)344-0606
Neighborworks Orange County	https://nwoc.org/	(714) 490-1250
Homeownership OC	https://www.homeownershipoc.org/	(714) 204-2314
Fair Housing Council of Orange County	https://www.fairhousingoc.org/	(714) 569-0823
Orange County Community Housing Corporation	https://www.occhc.org/	(714) 558-8161
Habitat for Humanity of Greater Los Angeles	https://www.habitatla.org/	(310) 323-4663
Consumer Credit Counseling Service of Maryland and Delaware, Inc.	https://cccsmd.org/	(800) 642-2227
Fair Housing Foundation	https://fhfca.org/	(800) 446-3247

Source: HUD Exchange Housing Counseling Agency search tool

Local Resources

The City of Fullerton maintains a contract with the non-profit organization Fair Housing Foundation (FHF), a regional non-profit fair housing agency. FHF assists residents with fair housing counseling services, counseling for landlords and tenants, rental housing counseling, provides education and outreach. In addition, FHF screens fair housing complaints, investigates through testing, and will engage in conciliation or mediation efforts or refer the complaints to the appropriate administrative agencies where appropriate. The City allocates CDBG funds to FHF's fair housing services with the goal of assisting residents and landlords by providing fair housing counseling and education.



Compliance with Existing Fair Housing Laws

The City of Fullerton is subject to state and federal laws related to fair housing. These laws include the following:

- California Fair Employment and Housing Act (FEHA) (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2)
- FEHA Regulations (California Code of Regulations (CCR), title 2, sections 12005-12271)
- Government Code section 65008 covers actions of a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy.
 - For example, a violation under Government Code section 65008 may occur if a jurisdiction applied more scrutiny to reviewing and approving an affordable development as compared to market-rate developments, or multifamily housing as compared to single family homes.
 - Government Code section 65008, subdivision (e), authorizes preferential treatment of affordable housing
- Government Code §8899.50 requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.
- Government Code §11135 et seq. requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of one's membership or perceived membership in a protected class.
- Density Bonus Law (Gov. Code, §65915.)
- Housing Accountability Act (Gov. Code, § 65589.5.)
- No-Net-Loss Law (Gov. Code, § 65863)
- Least Cost Zoning Law (Gov. Code, § 65913.1)
- Excessive subdivision standards (Gov. Code, § 65913.2.)
- Limits on growth controls (Gov. Code, § 65302.8.)
- Housing Element Law (Gov. Code, § 65583, esp. subs. (c)(5), (c)(10).)

The City of Fullerton complies with these laws through the City's daily operations. The City complies with the California Fair Employment and Housing Act (FEHA), prohibiting discrimination based on marital status, ancestry, source of income, sexual orientation, and arbitrary discrimination in addition to the groups protected under federal fair housing legislation. The City does not have local ordinances that relate to fair housing.

E.4 Ability to Address Complaints

Initiated by the Department of Justice's Civil Rights Division in 1991, fair housing testing is a technique used to uncover evidence of discrimination in rental housing. Fair housing testing involves one or more individuals who pose as prospective renters for the purpose of determining whether a landlord is complying with local, State, and federal fair housing laws. Enforcement actions may be taken when



investigations yield evidence of a pattern or practice of illegal housing discrimination. Testing may be initiated following the filing of a specific housing discrimination complaint or, as is the case when testing for discrimination against a specific class, as part of an overall effort to determine whether the discrimination is happening in a consistent systemic pattern in a city or region. In Orange County, fair housing testing is used to identify unlawful housing discrimination practices based on the real or perceived race, ethnicity, color, religion, gender identity or expression, national origin, disability, familial status, marital status, age, ancestry, sexual orientation, and source of income of prospective renters.

FHF Housing is funded to provide the full range of fair housing enforcement services to local renters and conducts fair housing testing of rental properties to assess how well rental properties conform to fair housing laws. In cases when evidence of deferential treatment is found, the property owners and managers are encouraged to attend fair housing workshops, which provide training and educational resources aimed at ending fair housing discrimination. Between 2015 and 2020, a total of 1,128 individuals participated in fair housing workshops, trainings, or counseling hosted by FHF.

HUD's Office of Fair Housing and Equal Opportunity (FHEO). Based on data provided by HUD, 30 FHEO inquiries were reported in Fullerton between 2013 and 2021. These inquiries are not considered official cases; however, they indicate a potential basis for discrimination in the city. Four of these inquiries were based on disability, and the remainder did not provide a basis.

E.5 Segregation and Integration Patterns and Trends

To inform priorities, policies, and actions, the housing element must include an analysis of integration and segregation, including patterns and trends. Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability in a specific geographic area. Segregation generally means the opposite condition, in which there is a high concentration of the characteristics described above in a specific geographic area. To adequately assess the patterns of integration and segregation, this section identifies trends at the regional scale (Orange County and the broader Southern California region) and at the local scale (City of Fullerton). To identify socio-economic and demographic spatial trends across these jurisdictions, this analysis utilizes HCD's AFFH Data Viewer, which provides an expansive collection of data from sources including the 2015-2019 ACS, HCD, HUD, UDP, the Center for Disease Control and Prevention (CDC), and other regional and federal agencies. In its AFFH guidance document published in April 2021, HCD describes the importance of segregation and integration analysis in relation to fair housing:

Residential segregation and exclusion, whether by race, ethnicity, disability, or income, is a result of numerous housing policies, practices, and procedures—both public and private—that have had enduring and pervasive negative impacts. Overt and covert housing discrimination through land use policy, shifting housing markets, and patterns of investment and disinvestment, have restricted meaningful fair housing choice and equitable access to opportunity, particularly for communities of color. Historic patterns of segregation persist in California despite the long-standing federal mandate, established by the Fair Housing Act of 1968 (FHA), that federal agencies and federal grantees affirmatively further the purposes of the FHA. Past and present discriminatory policies and practices, including long-term disinvestment, have resulted in neighborhoods with concentrated poverty and poor housing stock, limited access to opportunity, unsafe environmental conditions, underfunded schools, dilapidated infrastructure, and other disproportionately experienced problems. In addition, governmental policies have subsidized the development of segregated, high-resourced suburbs in metropolitan areas by constructing new highway systems—often through lower income communities of color— to ensure access to job opportunities in urban centers. This physical and



policy infrastructure supports patterns of discrimination and high levels of segregation that continue to persist in California and across the country. All of these conditions persist despite the over 50-year-old obligation to prohibit discrimination and affirmatively further fair housing.³

E.5.1 Race and Ethnicity

The ethnic and racial composition of a region relates to fair housing concerns such as household size, locational preferences, and economic opportunity. Historic exclusionary governmental policies, biased mortgage lending practices, and other tactics have caused racial and ethnic segregation and spatial inequities.

Regional Trends

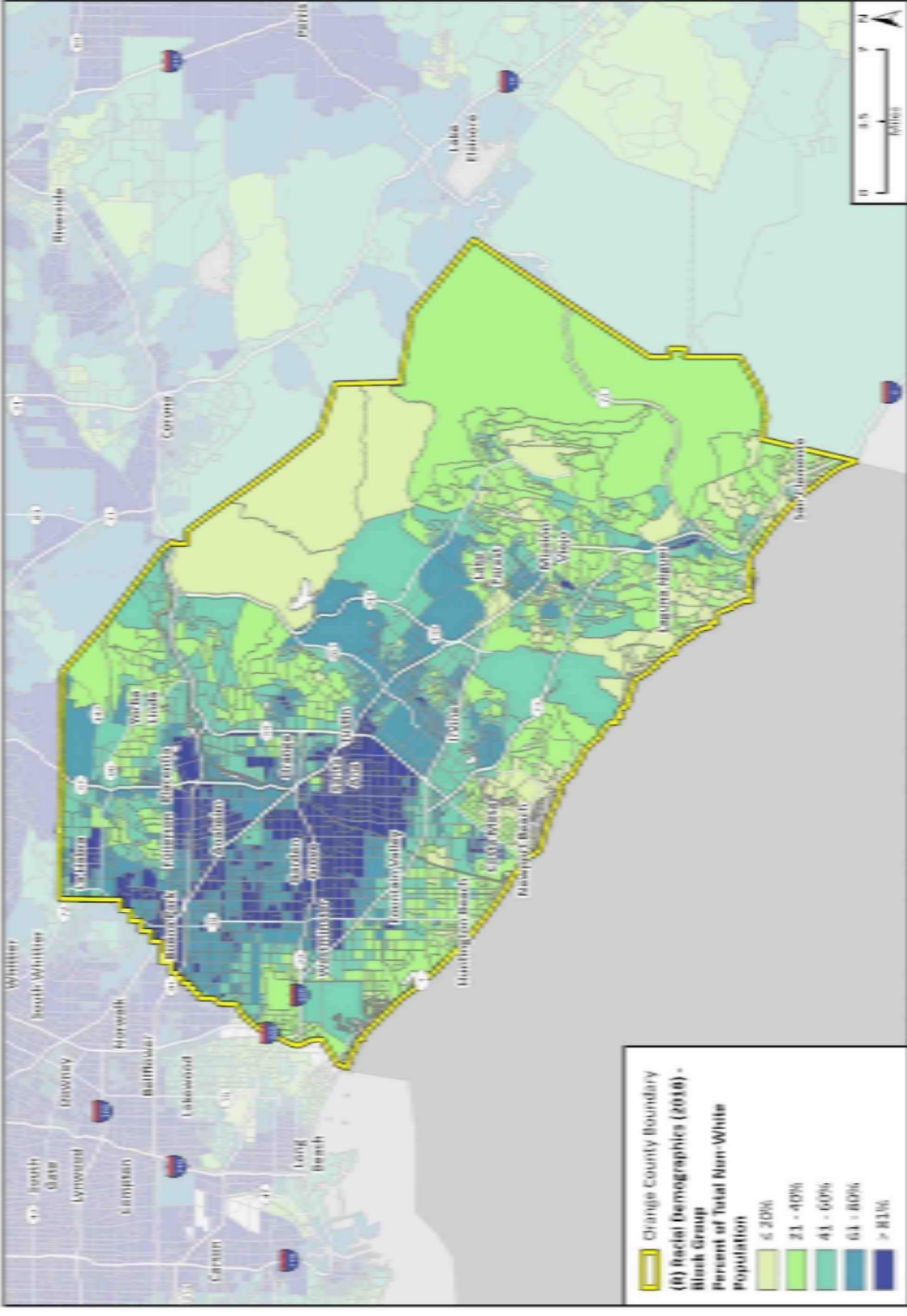
Regionally, the northern and central areas of Orange County, including the Cities of Buena Park, Santa Ana, and Westminster contain populations with the highest percentage of non-white residents. These areas have at least 80 percent of non-white residents, as shown in Figure E-2. Comparatively, the western and southeastern areas of Orange County have higher percentages of white alone populations, particularly near the less urbanized areas of the county and along the coast, which contain areas with 80 percent or more white residents. Orange County has the one of the lowest percentage of people of color in the SCAG region, second only to Ventura County. However, a large portion of the unurbanized areas of the county are designated a Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP), or national forest lands. The Cleveland National Forest makes up the majority of the southeastern corner of the county. As a result, little to no permanent housing exists in these areas.

HUD utilizes the racial/ethnic dissimilarity index to measure segregation levels across a defined geographic boundary. The racial/ethnic dissimilarity index ranges from 0-100, where 0 represents perfect integration between racial groups and 100 representing perfect segregation.⁴ According to the AI, Orange County experiences moderate levels of segregation, with significant variances in some individual jurisdictions. The Non-White/White value is 44.71, Black/White 46.98, Hispanic/White 52.82, and Asian or Pacific Islander/White is 43.19. Areas in central Orange County, particularly the cities of Orange, Santa Ana, and Tustin, have the highest Dissimilarity Index values for their populations. Black and Hispanic residents are particularly segregated in these jurisdictions. Racial/ethnic segregation has increased significantly since 2010.

³ HCD 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

⁴ HUD, 2020. <https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf>

Figure E-2 Percentage Total Non-White Population (Orange County)





Local Trends

According to the 2020 Census, Hispanic/Latino residents comprised the largest racial/ethnic group in Fullerton, followed closely by White residents. Table E-3 shows the population by racial category for Fullerton in 2010 and 2020 and compares the 2020 population to the composition of the SCAG region in 2020.

Fullerton’s racial composition has a higher percentage of white, non-Hispanic, Asian American/Pacific Islander, and “Other or Multiple Races” than the Southern California region, and a lower percentage of residents who identified as Hispanic and Black/African American. Generally, Fullerton’s population has become more diverse during the past decade. However, as shown in Figure E-3, there are several neighborhoods scattered throughout the city that have low-medium levels of segregation and several neighborhoods with high segregation. The neighborhoods of high POC segregation include Emery Park, Amerige Heights, La Habra South, Sunny Hills, E Imperial Hwy/N Harbor Blvd, and Acacia Park. These neighborhoods are predominantly Asian and are concentrated in the northeastern portion of the city. The neighborhood of Byerrum Park, located in the center of the city, has high white segregation. Areas with low-medium levels of segregation are Artesia Blvd/N Gilbert St, Valencia Park, Gilbert Park, Independence Park, Woodcrest Park, Santa Fe District/SoCo, Rancho La Paz, The Fox Block, Brea West, Craig Park, and Artisan Walk.

Table E-3 Population by Racial Group, City of Fullerton and the Southern California Region

Race	Fullerton (Percent of Population)		Southern California Region (Percent of Population)
	2010	2020	2020
Hispanic/Latino	34.4	37.7	46.7
White	53.8	37	30.3
Black/African American	2.3	2.2	6.2
Asian American/Pacific Islander	22.7	26.9	13.5
Other or Multiple Races	20.1	33	3.1

Source: US Census, 2020. Census State Redistricting Data, Table P1 and P2; SCAG. Racial Equity Baseline Conditions Report. 2022. https://scag.ca.gov/sites/main/files/file-attachments/2022racialequitybaselineconditionsreport_final.pdf

According to the most recent HUD data, Fullerton has higher levels of racial integration than segregation levels than the Los Angeles-Long Beach-Anaheim region (as defined by HUD), and the state overall. The racial/ethnic dissimilarity index ranges from 0-100, where 0 represents perfect integration between racial groups and 100 representing perfect segregation. Over the past three decades, the racial/ethnic segregation index score in Fullerton fluctuated, with slight increases and decreases (Table E-4). Since 2010, segregation between non-White/White residents and Black/White residents increased, and segregation between Asian American/Pacific Islander and Hispanic/Latino/White residents decreased. Although racial/ethnic segregation has increased in the city, segregation levels between all groups remain low compared to the Los Angeles-Long Beach-Anaheim region.



Table E-4 Racial Dissimilarity Index Values for Segregation (Fullerton and Los Angeles-Long Beach-Anaheim Region)

Race	Fullerton				Los Angeles-Long Beach-Anaheim Region			
	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	25.53	31.16	30.52	34.31	55.32	55.50	54.64	56.94
Black/White	30.60	31.84	26.53	38.26	72.75	68.12	65.22	68.85
Hispanic or Latino/White	33.72	39.98	38.28	35.48	60.12	62.44	62.15	63.49
Asian or Pacific Islander/White	30.41	33.48	35.24	31.01	43.46	46.02	45.77	49.78

Source: HUD, 2023, Table 3 – Racial/Ethnic Dissimilarity Trends

Figure E-5 shows the predominance of white, Hispanic/Latino, and Asian American/Pacific Islander populations in the city. The southern portion of the city has a sizable or predominant proportion of Hispanic/Latino residents, particularly the neighborhoods of Woodcrest Park and Rancho La Paz. The AFFH Data Viewer also shows the neighborhood of E Imperial Hwy/N Harbor Blvd in northern Fullerton as also having a predominant proportion of Hispanic Latino residents; however, this data is based on the residential units within the neighboring cities of La Habra and Brea. The portion of this census tract located within the City of Fullerton is comprised of entirely commercial and industrial uses and does not contain any residential units. The western section of the city, particularly in Emery Park, has a predominant Asian American/Pacific Islander population. The central and northern portions of the city have a sizable white majority population.

Areas with higher percentages of non-white residents are primarily located on the outer edges of the city, particularly within the south and western portions of the city (Figure E-4). These are also the densest areas of the city, with smaller lot sizes and more commercially zoned areas. Neighborhoods in northeastern and central Fullerton has higher percentages of white, non-Hispanic populations compared to other areas of the city. The northeastern and central portions of the city are less dense than the southern area of the city, and contain several golf courses and the Robert E. Ward Nature Preserve, which does not contain any housing.



E.5.2 Persons with Disabilities

For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting appropriate to an individual's needs as required under federal civil rights law, including equitably provided disability-related services that an individual needs to live in such housing. For example, persons with disabilities who are unable to use stairs or need a zero-step shower may not have actual housing choice if there are not sufficient housing units with these accessibility features.⁵

High spatial segregation of persons with disabilities may indicate fair housing issues related to not only physical needs, but also economic disparities. According to the *2020 Annual Report on People with Disabilities in America*, more than 25 percent of persons with disabilities (including physical, intellectual, and developmental; sensory; and other disability categories) live below the Census Bureau-designated poverty line, which is 14.5 percentage points higher than people without a disability.⁶ Persons with disabilities may be more reliant than persons without disabilities on fixed incomes or access to public transit.

Regional Trends

According to 2021 ACS estimates, 276,827 Orange County residents had one or more disabilities, or 8.8 percent of the total population. Figure E-7 shows the percentage of the population living with one or more disabilities throughout Orange County. The northwestern area of the county and the urban centers of cities had higher concentrations of persons living with one or more disabilities than other areas of the county.

Local Trends

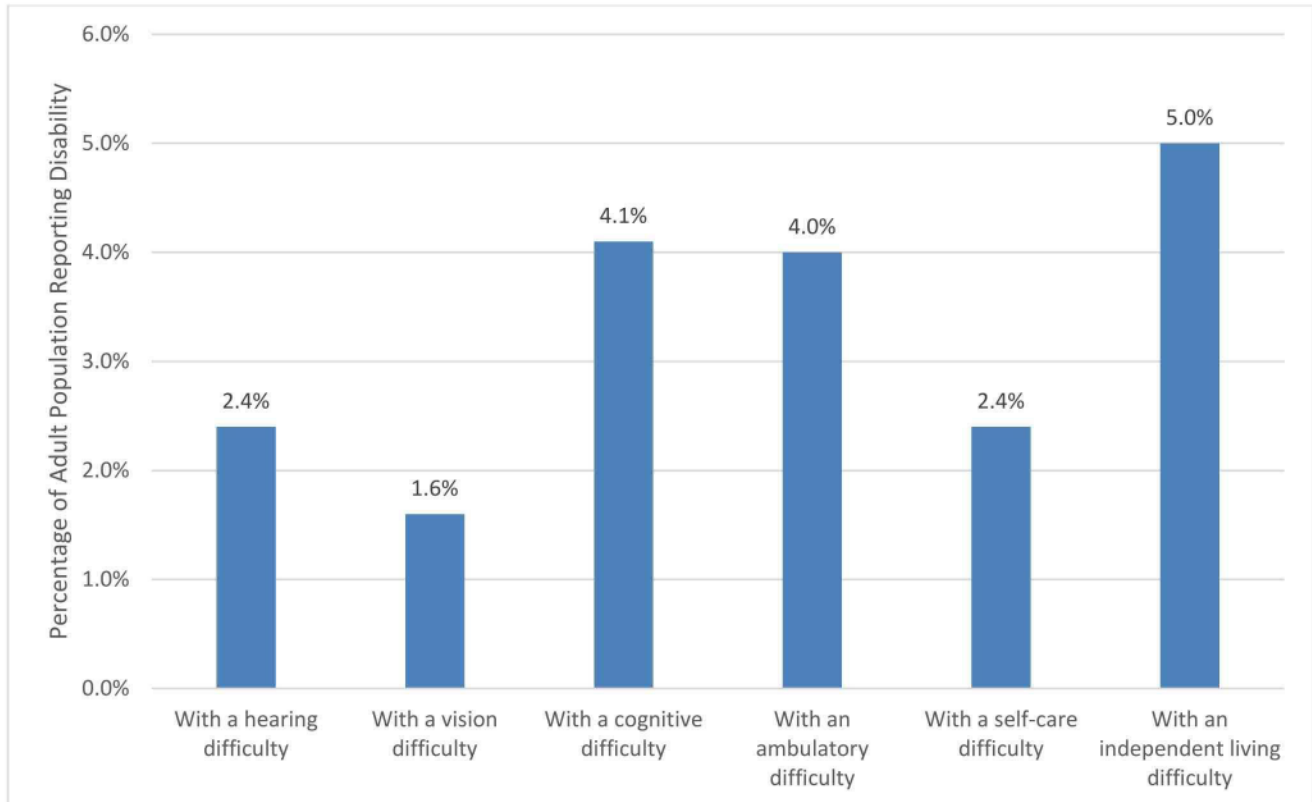
Approximately 13,617 residents (nearly 10 percent) of Fullerton's population live with one or more disabilities. According to 2021 ACS estimates shown in Figure E-6, independent living difficulty was the most common disability reported by Fullerton residents.

⁵ HCD, 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

⁶ Annual Disability Statistics Compendium, 2020. <https://disabilitycompendium.org/annualreport>



Figure E-6 Disability by Type (Fullerton)



Notes: These disabilities are counted separately and are not mutually exclusive, as an individual may report more than one disability. These counts should not be summed.

Source: U.S. Census Bureau, American Community Survey 1-Year Estimates (2021), Table S1810

Figure E-8 shows the percentage of the population living with one or more disabilities in the city by census tract. The percentage of residents reporting living with one or more disability ranged between zero and 20 percent. The neighborhoods in the city where disability ranged between 10 to 20 percent include Artesia Blvd/N Gilbert St, Valencia Park, Gilbert Park, W Commonwealth Ave/N Basque Ave, S Woods Ave/W Orangethorpe Ave, Sunny Hills, E Imperial Hwy/N Harbor Blvd, Bastanchury Rd/Fairway Isle Dr, Byerrum Park, Nutwood Ave/N Mountain View Pl. These neighborhoods are scattered throughout the city. The remainder of the city has less than 10 percent of residents reporting a disability. The neighborhood with the highest percentage of residents reporting a disability is S Woods Ave/W Orangethorpe Ave, located south of Valencia Drive and north of State Route 91, between Euclid Avenue and Richmond Avenue. This area is primarily comprised of low-density residential uses.



E.5.3 Familial Status

Familial status refers to the presence of children under the age of 18 and the marital status of the head of the household. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Examples of differential treatment include limiting the number of children in an apartment complex or confining households with children to a specific location are potentially discriminatory. Single parent households are protected by fair housing law. A 2016 HUD study studied the effects of housing discrimination based on familial status. The study found that landlords presented households with children fewer housing options, and the units shown were generally larger, and as a result, slightly more expensive to rent.⁷ Additionally, female-headed households with children require special consideration and assistance because of generally greater needs for affordable housing and accessible day care, health care, and other supportive services.

Regional Trends

Orange County had 1,057,592 households in 2021. According to 2017-2021 ACS estimates, households with children present comprise 23 percent of the total households in Orange County. Tenure by household type and presence of children is shown in Table E-5. Married couple families with children comprise the largest share of owner- and renter-occupied households with children. Single-parent, female-headed households comprised approximately eight percent of renter-occupied households, but only two percent of owner-occupied households.

Table E-5 Tenure by Household Type and Presence of Children (Orange County)

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Married Couple Family, with Children Present	146,405	24.3%	97,736	21.5%
Single-Parent, Male Householder, no Spouse Present	6,933	4.3%	14,628	3.2%
Single Parent, Female Householder, No Spouse Present	13,116	2.1%	37,771	8.2%
Total Households with Children Present	166,454	27.6%	80,831	17.8%
Total Households	602,440	100%	455,152	100%

Source: U.S. Bureau of the Census, ACS Table B25115 Tenure by Household Type (Including Living Alone) and Age of Householder, 2017-2021 Estimates.

The majority of Orange County has a relatively low percentage of households characterized as female-headed, single-parent households, as shown in Figure E-9. There are small pockets with higher proportion of households with children who reside in female-headed, single-parent households, such as portions of the cities of Laguna Woods, Newport Beach, Irvine, and Orange. The urban areas in the northwest portion of the county tend to have higher proportions of female headed households than the southeastern part of the county. The patterns amongst married couple households with children are very similar, as shown in Figure E-10. The urban areas in the northwest portion of the county tend to have lower proportions of married couples with children under 18 than the southeastern part of the county.

⁷ HUD. 2016. <https://www.huduser.gov/portal/sites/default/files/pdf/HDSFamiliesFinalReport.pdf>.



Local Trends

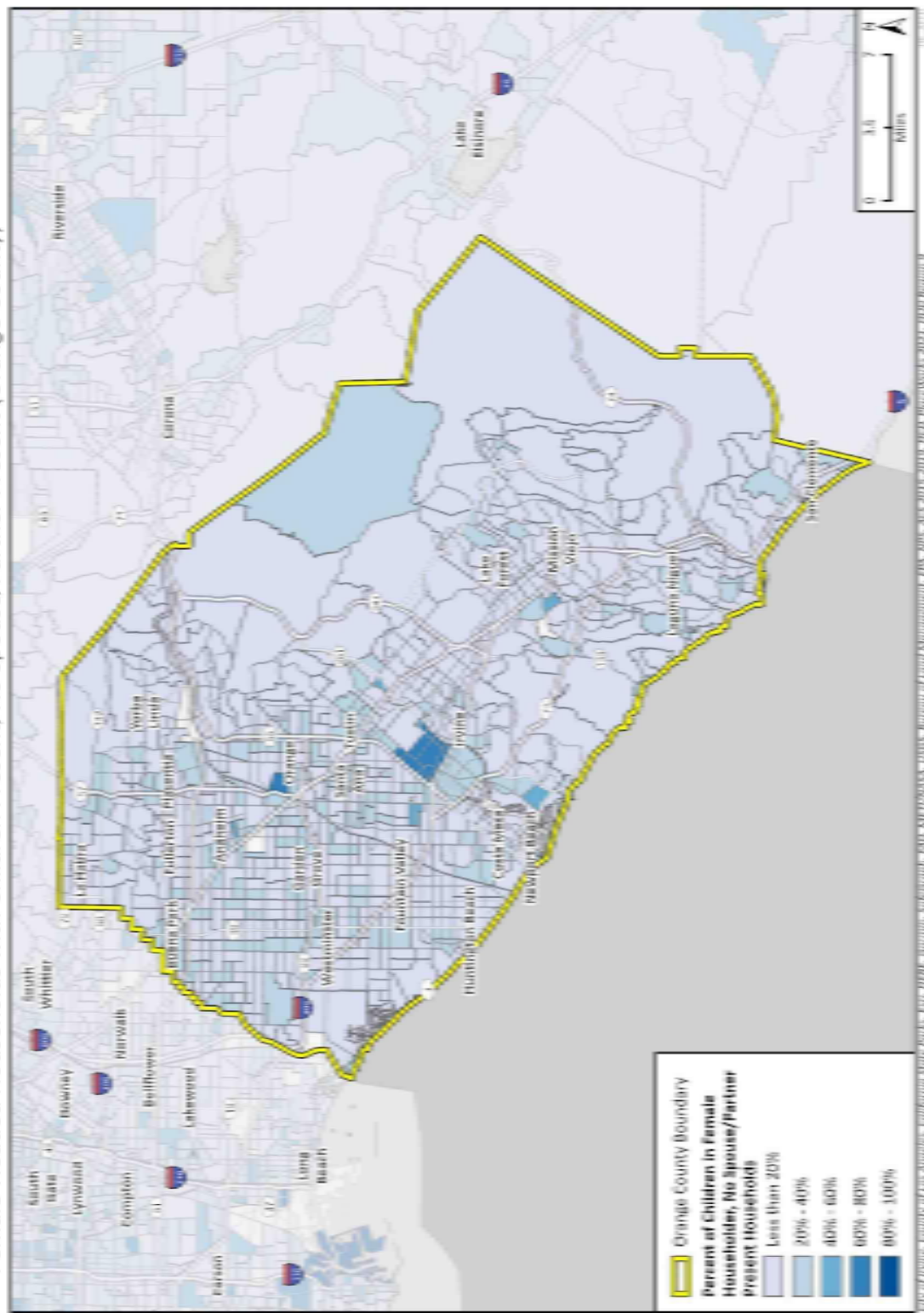
According to 2017-2021 ACS estimates, households with children present comprised 30 percent of the total number of households in Fullerton, which was higher than the county. An overview of household tenure by type for households with children present is provided in Table E-6. Similar to regional trends, married-couple families in Fullerton comprised the largest share of households with children present, and married-couple families were more likely to own than rent. Single-parent, female-headed households comprised nine percent of renter-occupied households and only one percent of owner-occupied households. The homeownership rate for single-family, female-headed households is slightly lower in Fullerton (1.2 percent) than the county (2.1 percent).

Table E-6 Tenure by Household Type and Presence of Children (Fullerton)

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Married couple family, with Children Present	6,060	24.6%	4,447	20.4%
Single-Parent, Male householder, no spouse present	350	1.4%	950	4.4%
Single-Parent, Female householder, no spouse present	297	1.2%	1,849	8.5%
Total Households with Children Present	6,707	27.2%	7,246	33.2%
Total Households	24,629	100%	21,805	100%

Source: U.S. Bureau of the Census, ACS Table B25115 Tenure By Household Type (Including Living Alone) and Age of Householder, 2017-2021 Estimates.

Figure E-9 Female-Headed Households with Children Present, No Spouse/Partner Present (Orange County)



Map of Orange County, California, showing the percentage of children in female households with no spouse/partner present. The map is color-coded by percentage, with a legend in the bottom right. The Orange County boundary is outlined in yellow. Major cities and areas labeled include South Placentia, South Orange, Orange, Fullerton, and others. A scale bar and north arrow are in the bottom right corner.

Source: APFH Viewer, 2022

Figure E-10 Children in Married-Couple Households (Orange County)

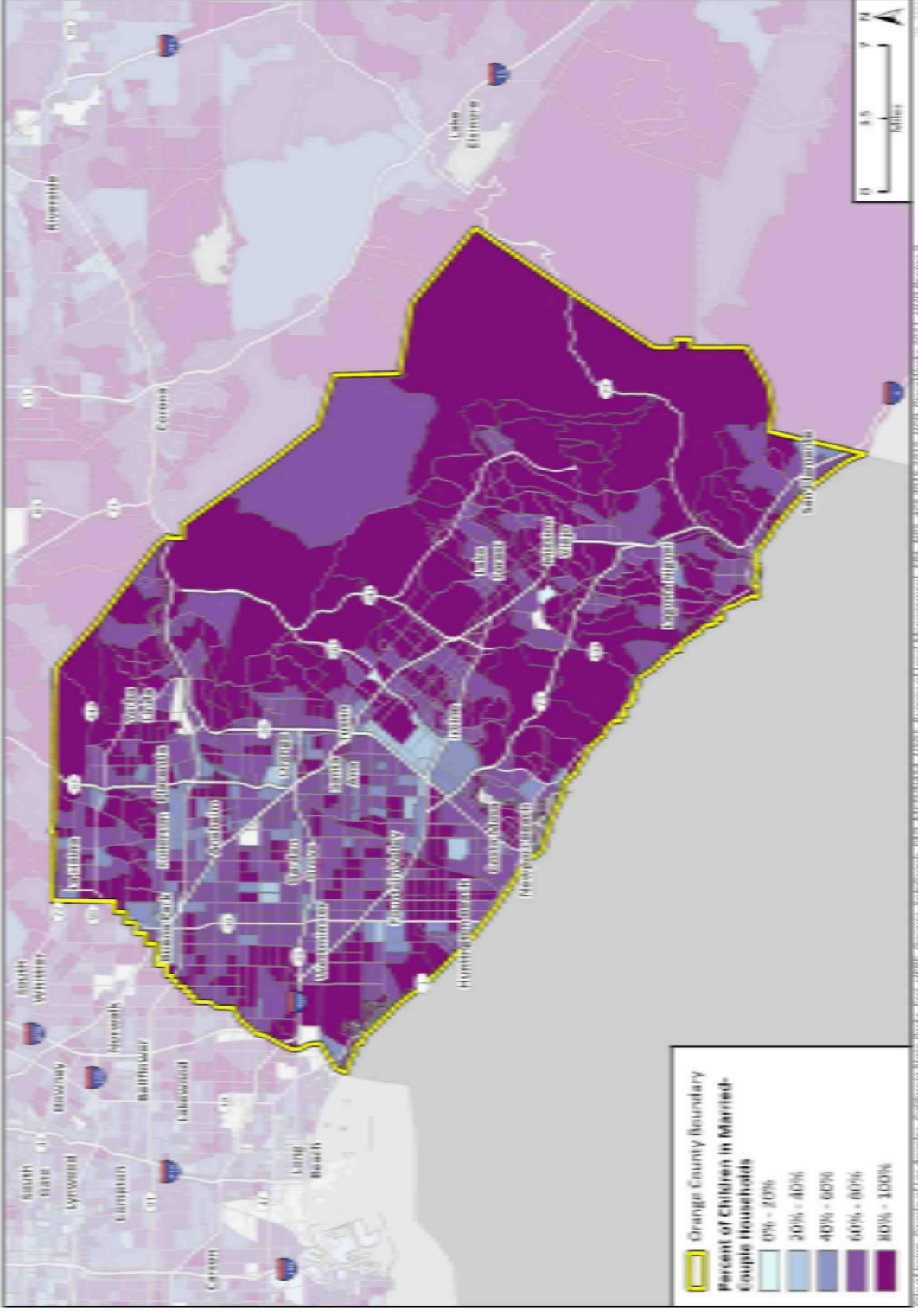




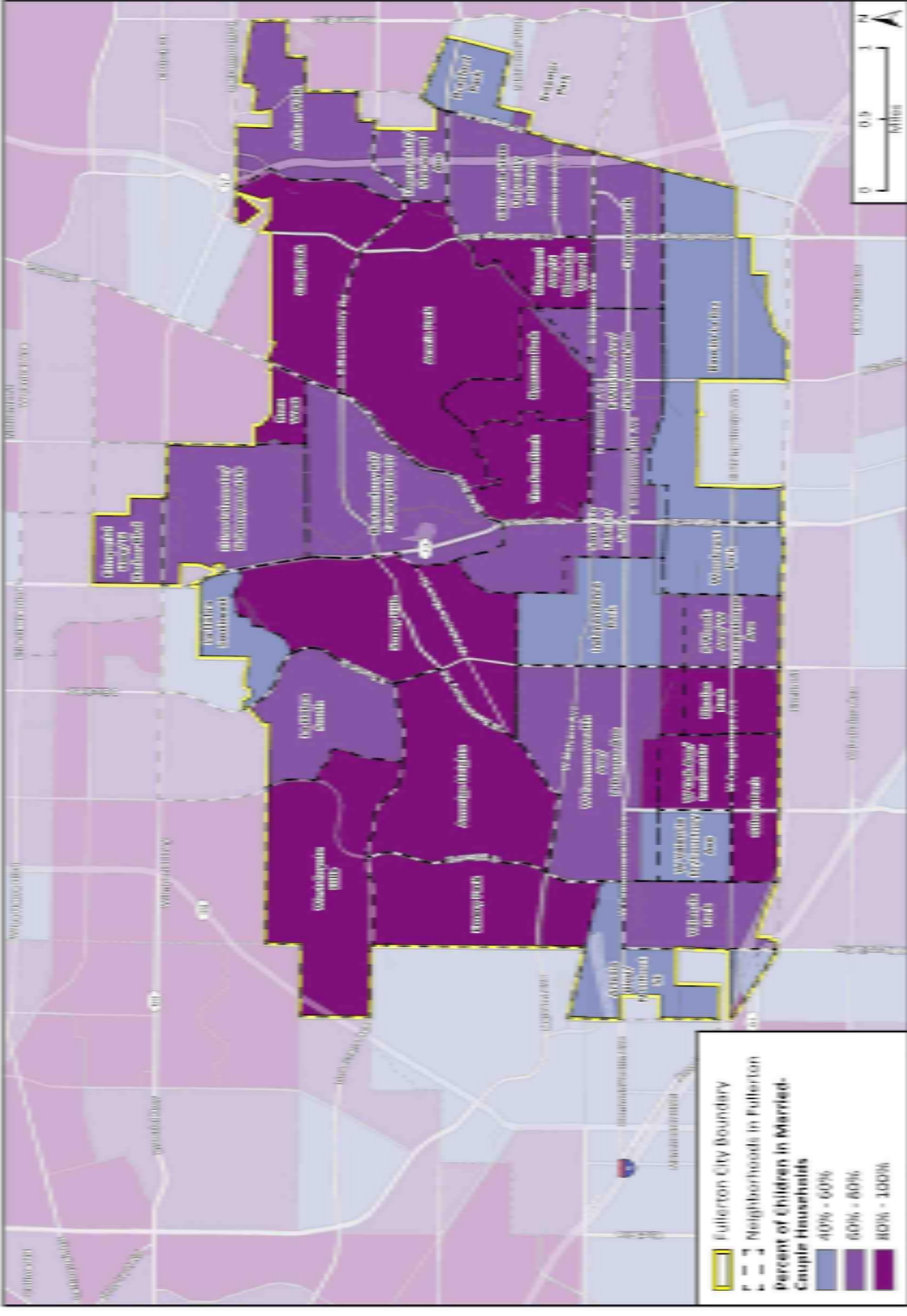
Figure E-11 shows the percentage of children residing in single-parent, female-headed households in Fullerton, which ranges from less than 20 percent to less than 40 percent. The neighborhoods that have a higher percentage of children residing in single-parent, female-headed households compared to the rest of the city include La Habra Southeast, Independence Park, W Valencia Dr/Courtney Ave, California State University Fullerton, and Bradford Park. These neighborhoods are scattered throughout the city. However, none of the neighborhoods in Fullerton have an extremely high percentage of single, female-headed households.

Figure E-12 shows the percentage of children in married-couple households across Fullerton. Most census tracts in the city had over 60 percent of children living in married-couple households, according to 2015-2019 ACS estimates. Several of the areas that have the highest percentage of married couple households overlap with the areas with a predominant white, non-Hispanic or Asian American population. These include the neighborhood of West Coyote Hills, Emery Park, Amerige Heights, Sunny Hills, The Fox Block, Acacia Park, Brea West, Nutwood Ave/N Mountain View Pl, and Craig Park. Additionally, the neighborhoods of Gilbert Park, W Oak Ave/Lambert Dr, and Nicolas Park have high percentage of married couple households with children. The area with the lowest percentage of married-couple households with children is the neighborhood of Artesia Blvd/N Gilbert St .

Neighborhoods that have lower rates of children in married-couple households are more likely to contain higher density residential development, smaller lot sizes, and industrial and commercial land uses compared to neighborhoods with higher rates of children in married-couple households.



Figure E-12 Children in Married-Couple Households (Fullerton)





E.5.4 Household Income

Household income is directly connected to the ability to afford housing. Higher-income households are more likely to own rather than rent housing. As household income decreases, households tend to pay a disproportionate amount of their income for housing and the number of persons occupying unsound and overcrowded housing increases. To achieve fair housing objectives, people in low-income households must have actual choice in housing opportunities—that is, when they are able to locate units that are affordable and well maintained in all parts of a jurisdiction and region.

This section identifies household income disparities using data based on median household income and low or moderate income (LMI) geographies. HUD defines an LMI area as a census tract or block group where over 51 percent of the population is LMI. The definition of low or moderate income is based on HUD income definitions of up to 80 percent of the AML.

Regional Trends

According to 2021 ACS estimates, Orange County has a median household income of \$100,559, which is much higher than the SCAG regional income of \$77,430. Figure E-13 displays median household income by block group for Orange County using 2015-2019 ACS estimates. However, there are some gaps in data across the county (as shown in white), which may skew the median income ranges within the county.

Median household income tends to be higher in communities located in southwest Orange County. Generally, households in the urban core of cities, such as Santa Ana, Westminster, Placentia, and Anaheim have a lower income than rural or suburban areas. Communities with the lowest median household incomes are concentrated in the urban areas in the northwest portion of the county.

LMI populations by census tract for Orange County are displayed in Figure E-14. Census tracts within the cities of Santa Ana, Fullerton, and Anaheim contain the highest percent of LMI populations in Orange County. LMI populations are in communities with a relatively greater percentage of children living in single-parent, female-headed households (Figure E-9) and a greater percentage of non-white populations (Figure E-11).

Local Trends

Geographically, median household income varies throughout Fullerton. According to 2021 ACS estimates, Fullerton has a median household income of \$95,431, which is approximately five percent lower than the median income for Orange County but 19 percent higher than the SCAG region's median income of \$77,430. Fullerton's median income is slightly lower to other cities in northern Orange County, such as Buena Park, Orange City, and Brea (\$101,346, \$103,045, and \$108,721 respectively). Figure E-15 provides an overview of median household income by block group in the city. The lowest median household income areas are in the southern portion of the city. The block group with the lowest median household income is the location of California State University Fullerton. It is likely that the prevalence of students in this neighborhood lowers the median household income.

In contrast, the neighborhoods of West Coyote Hills, Amergie Heights, Sunny Hills, E Las Palmas Dr/N Sunnywood Dr, Craig Park, The Fox Block, Byerrum Park, and Acacia Park neighborhoods in the central and northern areas of Fullerton have higher median household incomes. These areas also have predominant Asian and White, non-Hispanic residents, as shown in Figure E-16. The neighborhood with the highest median income is Sunny Hills with a median income of \$184,018.



City of Fullerton
Housing Element

LMI populations in Fullerton are concentrated in the southern portion of the city, as shown in Figure E-17. The Rancho La Paz, Woodcrest Park, and Valencia Park neighborhoods had a higher percentage of LMI populations (between 75 and 100 percent of the population). In contrast, neighborhoods in the center and northern portion of the city tend to have lower percentages of LMI populations. West Coyote Hills, Acacia Park, Byerrum Park, and Nutwood Ave/N Mountain View Pl have the lowest percentage of LMI populations (less than 25 percent of the population). Neighborhoods with higher rates of LMI populations tend to overlap with areas of the city that have predominantly Hispanic/Latino populations.

Poverty rates in Fullerton have shifted slightly over time. Poverty rates increased from 12 percent in 2019 to 13 percent in 2021. This is on par with the poverty rates in the larger Southern California region (13 percent). Figure E-18 displays the percentage of the population earned an income that was below the poverty line.



Figure E-13 Median Household Income (Orange County)

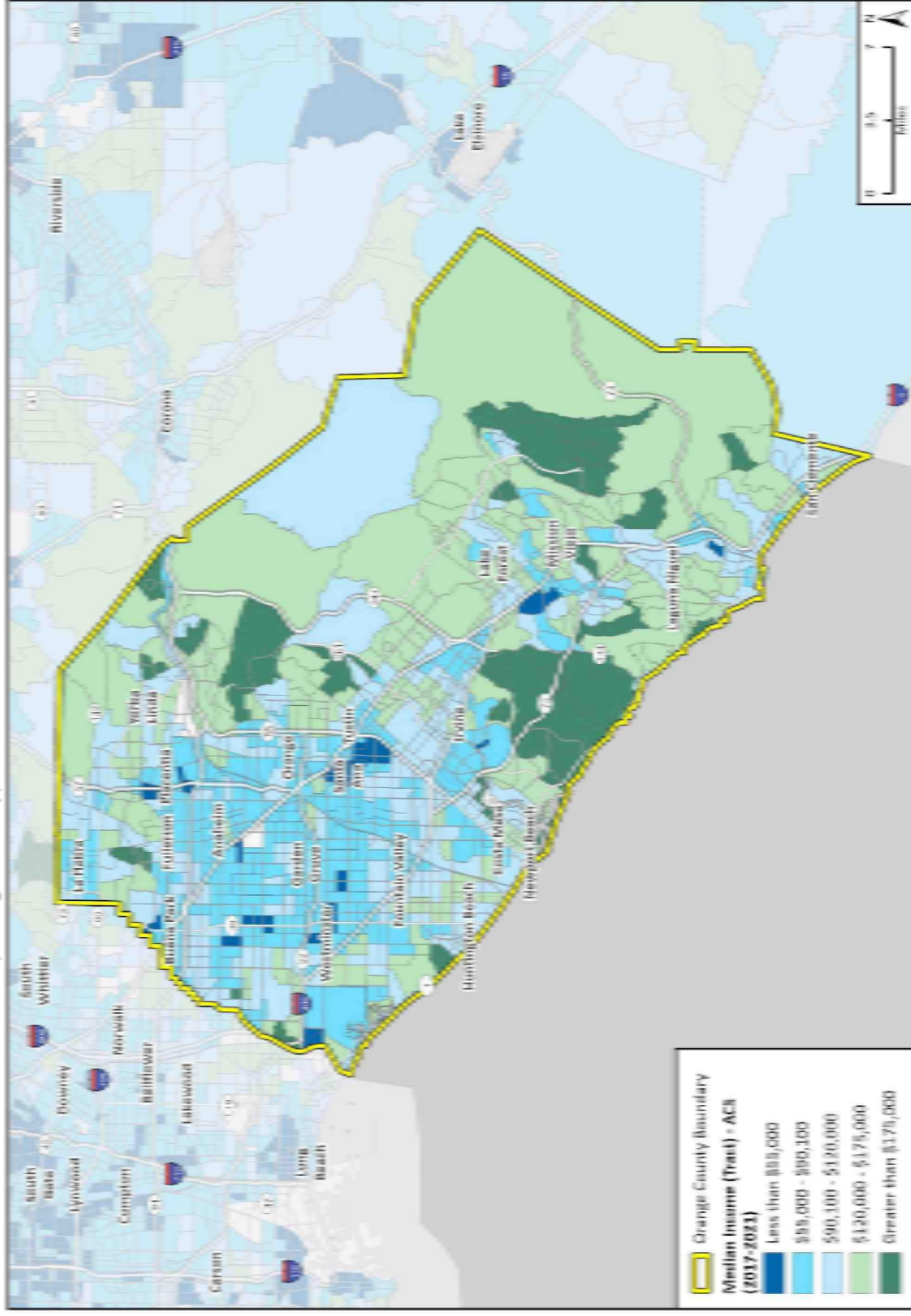


Figure E-14 Low and Moderate Income Population (Orange County)

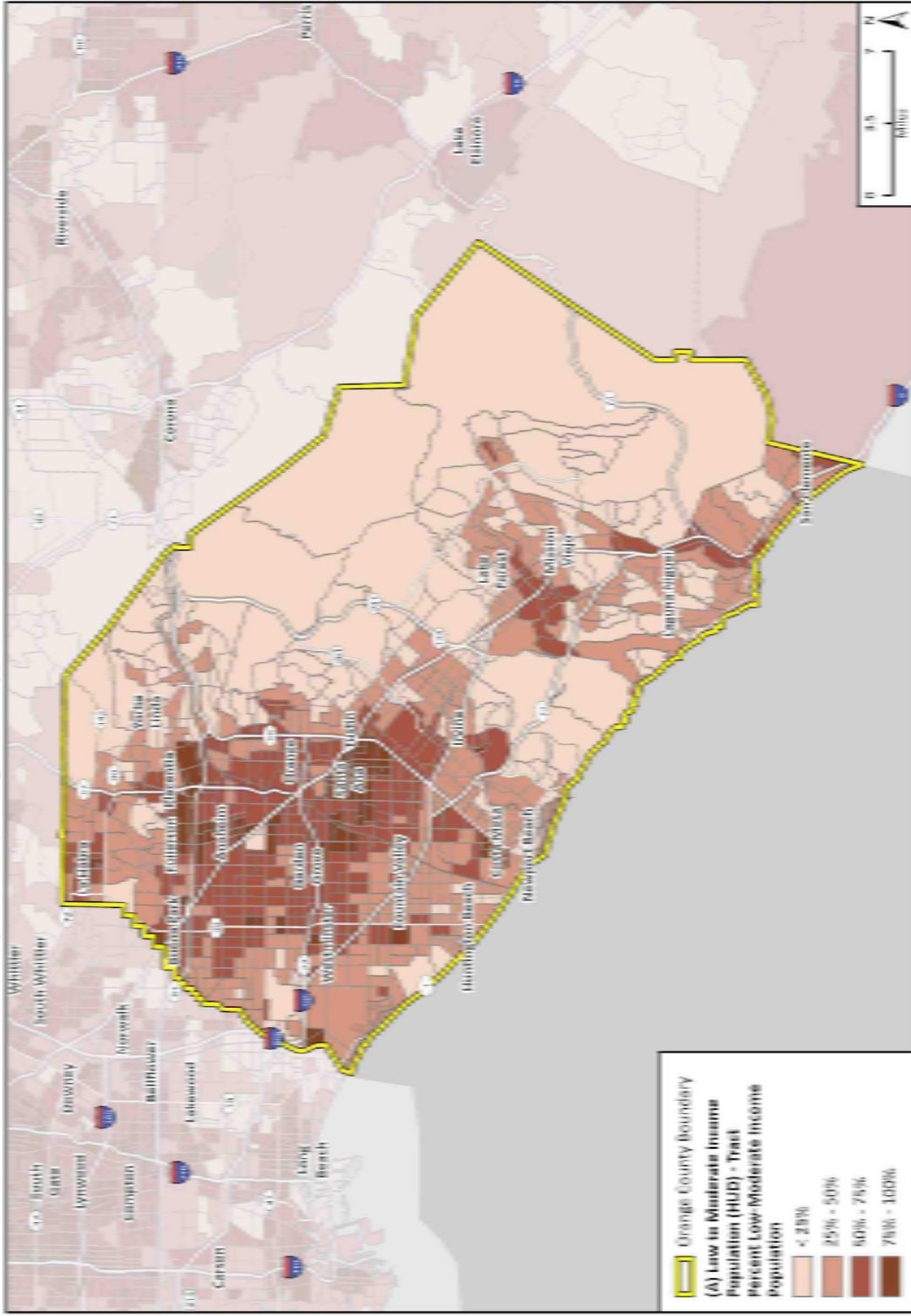


Figure E-16 Median Household Income and predominant Racial/Ethnic Population (Fullerton)

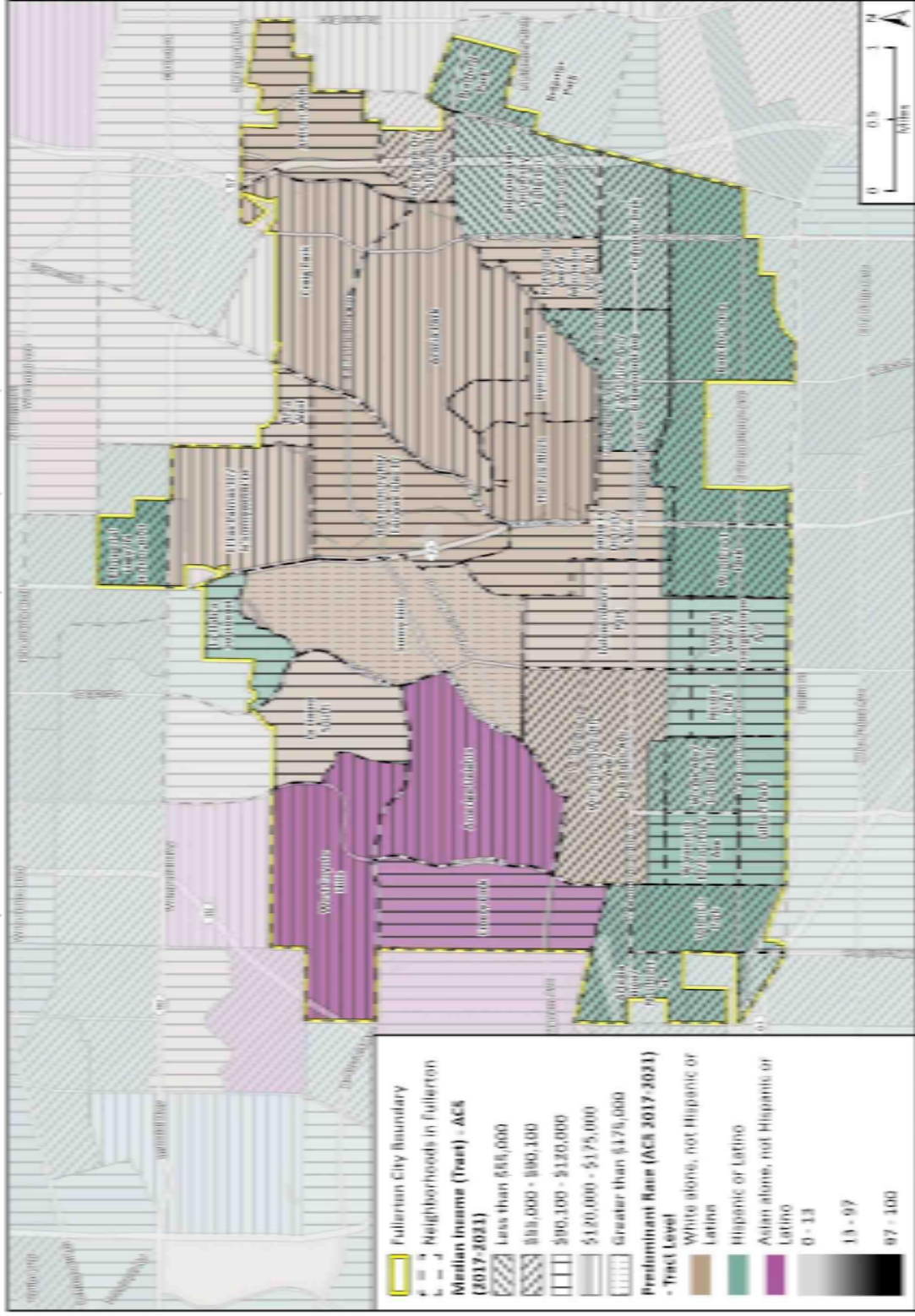




Table E-7 displays income level by household type. According to 2017-2021 ACS data, married-couple families within Fullerton have significantly higher incomes than nonfamily households, which consist of people who live alone or share a residence with unrelated individuals. Given the location of California State University Fullerton, many of the nonfamily households within Fullerton may be comprised of students, which may impact the median incomes of that household category. Approximately 63 percent of married couple families make above \$100,000 per year, compared to 25 percent of nonfamily households and 47 percent of total households.

Table E-7 Income Level by Household Type (Fullerton)

Income Level	Total Households	Married-Couple Families	Nonfamily Households
Less than \$10,000	4.4%	0.9%	10.7%
\$10,000 to \$14,999	2.8%	1.0%	6.0%
\$15,000 to \$24,999	4.4%	1.9%	6.3%
\$25,000 to \$34,999	6.0%	4.1%	8.1%
\$35,000 to \$49,999	9.0%	6.5%	12.0%
\$50,000 to \$74,999	15.1%	11.9%	20.0%
\$75,000 to \$99,999	11.1%	10.3%	12.2%
\$100,000 to \$149,999	19.1%	22.5%	12.8%
\$150,000 to \$199,999	12.5%	17.3%	6.4%
\$200,000 or more	15.6%	23.6%	5.4%
Median income	\$92,718	\$129,862	\$58,271

Source: U.S. Bureau of the Census, ACS Table S1901, Income in the Past 12 Months (Inflation-Adjusted Dollars), 2017-2021 Estimates

E.5.5 Racially and Ethnically Concentrated Areas of Poverty

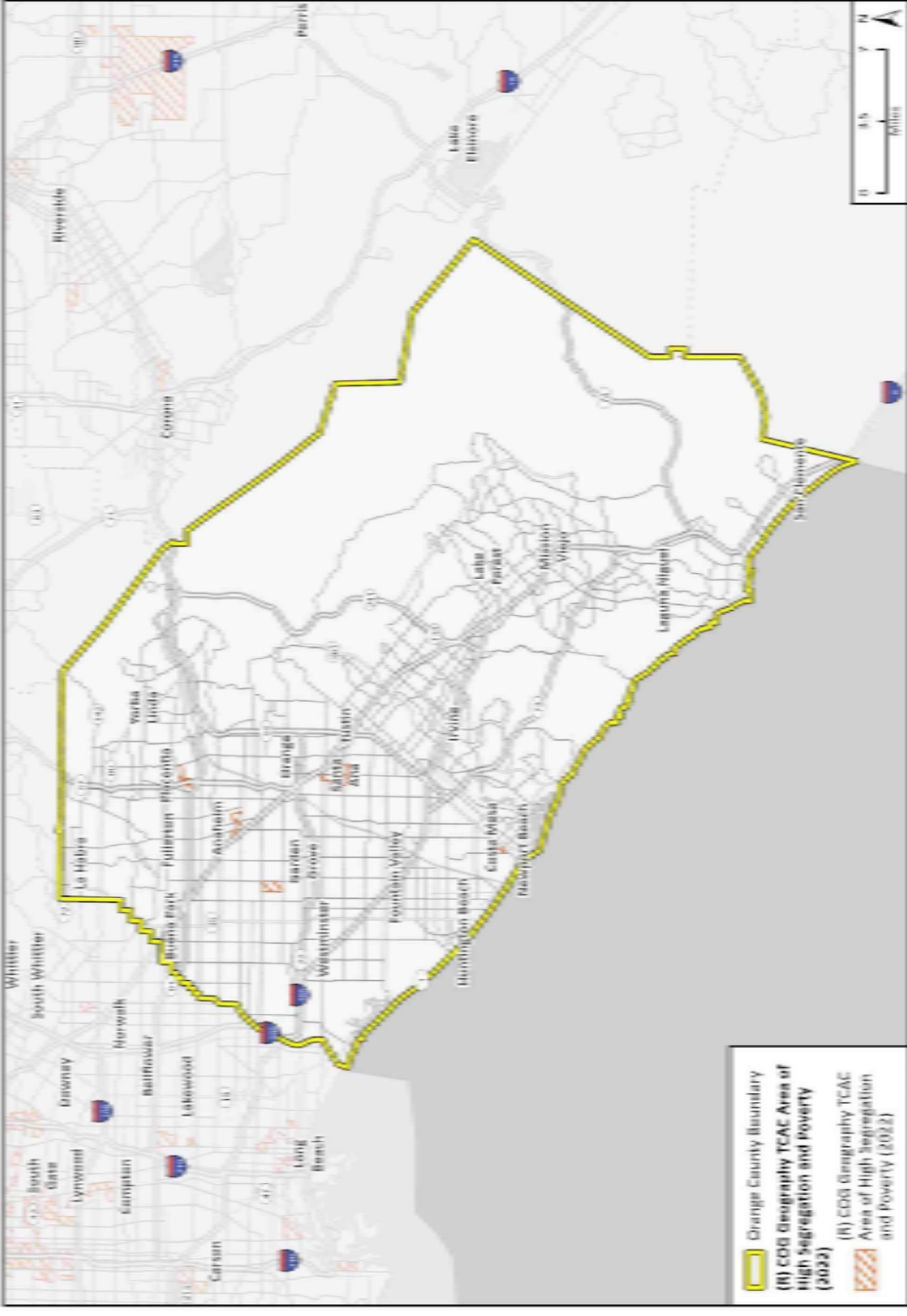
To identify racially and ethnically concentrated areas of poverty (known as R/ECAPs), HUD developed thresholds based on racial and ethnic concentration and income level. The threshold for racial and ethnic concentration is a non-white population of 50 percent or more in metropolitan or micropolitan areas. The income threshold is based on areas of “extreme poverty,” where 40 percent or more of households earn incomes at or below the federal poverty line, or where the poverty rate is three times the average poverty rate in the metropolitan area, whichever is less. An area that meets both thresholds for racial or ethnic concentration and “extreme poverty” is considered a R/ECAP.

E.5.6 Poverty and Segregation

Regional Trends

In Orange County, R/ECAPs are present in neighborhoods in the urban cities in the northern portion of the county, including in Costa Mesa, Santa Ana, Garden Grove, Anaheim, and Placentia. These areas are shown with hash marks in Figure E-19.

Figure E-19 Areas of High Segregation and Poverty (Orange County)



City of Fullerton, County of Orange, California State Parks, Esri, HERE, DeLorme, Intermap, INCREMENTAL, NAVTEQ, Swire, UNICOM, UStream, USA, Bureau of Land Management, EPA, NPS, ACE 2017-2018, NCS, NCEMWorks 2021, HDX Region 9
 2021, American Community Survey, the mapping software and other data sources.

Source: AFFH Viewer, 2021.



Local Trends

While R/ECAPs were not identified within Fullerton, there are areas where lower household income and racial and ethnic concentration overlap. The neighborhoods of Woodcrest Park, California State University Fullerton, and Deepark Dr/Sherwood Ave had the highest poverty rates within the city. However, the high percentage of students surrounding CSUF likely affects at least some of this data. The southern portion of the city had higher percentage of the population below the poverty line than the northern portion of the city, with the majority of neighborhoods south and immediately north of Commonwealth Avenue having between 10 and 20 percent of the population below the poverty line. The neighborhood of Woodcrest Park has a poverty rate between 20 and 30 percent.

E.5.7 Concentrated Areas of Affluence

While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed. RCAAs are defined as affluent, white communities.⁸ According to a policy paper published by HUD, white residents are the most racially segregated group in the United States typically more affluent than majority non-white communities. RCAAs have not been studied extensively, nor has a standard definition been adopted by HCD or HUD. Therefore, this assessment uses the percent white population and median household income as thresholds to identify potential RCAAs. In addition to having a higher median income, areas of affluence experience less overcrowding, less housing cost burden on renters, and are generally less susceptible to displacement compared to LMI areas, as described in Section 4.4, *Household Income*.

Regional Trends

The areas characterized as RCAAs in Orange County are shown in Figure E-20, which are concentrated in the southeastern portion of the county and along the coast, such as Laguna Beach, San Clemente, Newport Beach, and non-urbanized areas. Generally, cities with higher median incomes such as the Laguna Beach and San Clemente have relatively larger concentrations of white residents compared to jurisdictions with lower median incomes such as the cities of Anaheim, Santa Ana and Buena Park, as shown in Figure E-2 and Figure E-13.

Local Trends

Similar to trends occurring in Orange County, areas with higher median incomes are associated with a larger proportion of white residents compared to census tracts with lower median incomes.

Neighborhoods in the northeast corner of Fullerton had a predominately white population and the highest median income levels in the city, as shown in Figure E-21. In Fullerton, the neighborhoods of E Las Palmas Dr/N Sunnywood Dr, Craig park, Sunny Hills, Bastanchury Rd/Fairway Isles Dr, Acacia Park, and Byerrum Park are defined as RCAAs.

Most RCAA designated neighborhoods in northeast Fullerton are comprised primarily of single-family homes. Less than 10 percent of structures are comprised of two or more units. This is much less than the neighborhoods in the southern half of the City, where between 20 and 35 percent of the housing stock is comprised of multifamily homes in most areas. Bastanchury Rd/Fairway Isles Dr, Acacia Park, and Byerrum Park neighborhoods have a lower percentage of older units than other neighborhoods in the city, with less

⁸ Goatz, Damanio and Williams, 2019. <https://www.huduser.gov/portal/periodicals/cityscape/vol21num1/ch4.pdf>



than 20 percent built before 1960. In the neighborhoods of E Las Palmas Dr/N Sunnywood Dr and Craig Park, between 20 and 40 percent of units were built prior to 1960. This is much lower than the southern portion of the city, where between 40 and 80 percent of units were built prior to 1960. RCAAs in Fullerton have lower rates of overcrowding. Most residents in RCAAs do not have walkable access to High Quality Transit Stops.

A survey conducted in May 2024 to gather stakeholder input provided local knowledge on the patterns of RCAA designated neighborhoods in northeastern Fullerton. Five survey respondents indicated that RCAAs are characterized by large parcels, large single-family homes, greater setbacks, and hilly terrain. The large, single-family homes are affordable to higher-income residents who are typically well-educated professionals. The area also has abundant parkland and high performing schools. It was noted that RCAAs in Fullerton have minimal multifamily zoning and opportunities for diverse housing typologies, which limits opportunities for low or moderate-income households. It was also noted that while some residents in RCAAs may support constructing an ADU for a family member, they are generally opposed to additional density, citing infrastructure constraints. The lack of diverse housing opportunities in RCAAs has created and perpetuated racial and economic segregation within the city.

While most of the RCAAs are built out, the City has prioritized strategies to increase density and diversify housing types in these areas:

- Providing adequate sites for housing development, targeting higher density development in northeastern Fullerton (Policy Action 3.1)
- Facilitating infill development in high resource areas, particularly on religious sites (Policy Action 3.3)
- Targeting ADU outreach in high resource areas (Policy Action 3.6)
- The Site Inventory identifies 1,008 housing units in RCAAs, including 368 lower-income units and 311 moderate-income units, to provide diverse housing opportunities and increase opportunities for economic integration. The City will also implement Policy Action 3.4 to support the development of a variety of housing types and greater densities, as well as Policy Action 3.6 to support ADU development in northern Fullerton.



E.6 Disparities in Access to Opportunities

According to HCD guidance, land use policies and urban planning impact the ability of residents to access neighborhoods of opportunity, with high-performing schools, greater availability of jobs that afford entry to the middle class, and convenient access to transit and services. The limits on housing choice and access experienced by people within protected classes, such as race, sexual orientation, or disability, have far-reaching impacts on access to job opportunity, quality education, and mental and physical health.⁹ This section analyzes the following place-based characteristics linked to opportunity indicators: quality education, employment, transportation, and healthy environment. The primary objective is to understand the disparity between communities in terms of access to real and potential economic benefits and quality of life.

HUD's Opportunity Indices were created to inform communities about racial/ethnic segregation and disparities in access to opportunity.¹⁰ Table E-8 provides opportunity indicator index scores (ranging from 0-100, with 100 representing the most positive outcomes) for Fullerton for each race/ethnicity, as described by the AI. Measured at the neighborhood level, the index scores are intended to inform communities about segregation and disparities in access to opportunity in their jurisdiction and compare the opportunity indicators rankings across racial/ethnic groups. Generally, higher index scores are indicative of greater access to opportunity. For example, the "low poverty index" captures the poverty rate within a given neighborhood; the higher the index score means the less exposure to poverty. A higher "jobs proximity" score means that residents have greater accessibility to employment locations within the larger region.¹¹ Each index is measured using the following variables:

- Economic Opportunity Index: a composite of poverty rate by census tract, percentage of adults with a bachelor's degree, percentage of adults employed, and number of jobs for persons without a bachelor's degree that fall within a given radius of each census tract.
- Environmental Opportunity Index: exposure to pollution burden shown in CalEnviroScreen.
- Educational Opportunity Index: the percentage of fourth-grade students testing proficient in reading and math within three miles of a census block group.
- Low Transportation Cost Index: the cost of transportation and proximity to public transportation by neighborhood.
- Transit Index: How often low-income families in a neighborhood use public transportation.

In Fullerton, Asian/Pacific Islander and white, non-Hispanic residents have greater accessibility to areas with greater economic opportunity, lower environmental pollutants, educational opportunity, lower transportation costs. In comparison, Hispanic/Latino residents and, Black/African-American and Hispanic/Latino populations had greater access to public transit, but lower economic and educational opportunities, and the greatest exposure to environmental health concerns. Most opportunity scores were lower for residents earning an income below the federal poverty level compared to the total population in Fullerton.

⁹ HCD, 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf

¹⁰ HUD, 2020. <https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf>

¹¹ Urban Institute, 2018. https://www.urban.org/sites/default/files/publication/98674/place_and_opportunity_brief_3.pdf



Residents who earned an income below the poverty level in Fullerton had lower economic and education opportunities, greater exposure to environmental health concerns, but lower transportation costs. Black/African American, Hispanic/Latino and Asian/Pacific Islander residents earning below the poverty line had greater access to public transit.

Table E-8 Opportunity Indicators by Race/Ethnicity (Fullerton)

	Economic Opportunity Index	Environmental Opportunity Index	Educational Opportunity Index	Low Transportation Cost Index	Transit Index
Total Population					
White, Non-Hispanic	55.78	26.03	58.12	38.56	36.36
Black, Non-Hispanic	43.93	23.39	50.62	43.17	39.78
Hispanic	37.14	20.28	43.05	41.48	39.47
Asian or Pacific Islander, Non-Hispanic	64.09	25.70	65.77	35.43	35.37
Native American, Non-Hispanic	42.61	22.90	48.14	41.21	38.35
Population Below Federal Poverty Line					
White, Non-Hispanic	42.62	23.49	50.72	45.41	10.98
Black, Non-Hispanic	26.27	20.02	37.49	50.76	44.32
Hispanic	29.84	19.52	38.35	43.06	41.15
Asian or Pacific Islander, Non-Hispanic	57.70	27.73	64.75	42.01	39.39
Native American, Non-Hispanic	43.26	22.70	51.35	38.76	34.99

Source: County of Orange AI, 2020

An overview of opportunity indicators for Orange County is provided in Table E-9. According to the AI, compared to Orange County, Fullerton scored slightly lower for economic opportunity and educational opportunity, and had significantly greater exposure to environmental health concerns. Fullerton scored higher for transportation costs and proximity to public transit compared to Orange County as a whole. Across Orange County, residents earning an income below the poverty level scored slightly lower for environmental health concerns, and economic and educational opportunities compared to the total population.



Table E-9 Opportunity Indicators by Race/Ethnicity (Orange County)

Total Population	Economic Opportunity Index	Environmental Opportunity Index	Educational Opportunity Index	Low Transportation Cost Index	Transit Index
White, Non-Hispanic	59.36	53.88	58.61	33.84	27.43
Black, Non-Hispanic	45.85	45.21	45.63	39.68	36.21
Hispanic	31.86	41.02	30.86	41.80	41.28
Asian or Pacific Islander, Non-Hispanic	49.36	46.78	52.50	37.48	36.11
Native American, Non-Hispanic	46.39	48.19	45.07	37.47	33.02
Population Below Federal Poverty Line					
White, Non-Hispanic	51.70	51.01	52.13	39.18	32.26
36.25	36.25	40.42	37.29	40.77	35.60
Hispanic	22.65	39.02	23.81	45.65	46.35
Asian or Pacific Islander, Non-Hispanic	38.9	46.38	48.32	41.97	39.51
Native American, Non-Hispanic	35.89	38.62	40.92	40.15	40.17

Source: County of Orange AI, 2020

E.6.1 Transit Access and Walkability

Reliable public transit access and active transportation options such as walking and biking are imperative for low-income residents and/or persons with disabilities to connect to employment opportunities. Lack of transportation options can impede fair housing choice and continue to reinforce barriers for low-income communities in accessing housing and employment opportunities.

Regional Trends

Orange County generally has widespread access to public transit. Accessible transportation infrastructure includes the Orange County Transportation Authority (OCTA), Metrolink, and Amtrak. OCTA provides a variety of bus services and OC Flex, an on-demand curb-to-curb shuttle service. Amtrak operates the Pacific Surfliner, which runs along the 351-mile Los Angeles – San Diego – San Luis Obispo Rail Corridor (LOSSAN Corridor) through Orange County. The Surfliner stops at stations in Fullerton, Anaheim, Santa Ana, and Irvine.

Transit use is higher where investment in transit service has been made. Almost all major employment centers in Orange County are served by some form of public transit. However, having regional access to jobs by means of public transit does not necessarily translate into stable employment. Some residents with unique needs, such as households with children, have unique travel patterns that may prevent them from obtaining work far from home due to childcare needs, access to schools, and other considerations.

Orange County received an average AllTransit performance score of 4.2 which equates to a low combination of trips per week and number of jobs accessible by transit, enabling relatively few people to take transit to work.¹² The land uses within Orange County do not support transit ridership. Throughout much of the county, residential uses are low density and spread out. The streets were not designed with walkability in mind. Additionally, bus service is focused on a select number of hubs, and on a few key

¹² AllTransit.Org, 2023. <https://alltransit.cnt.org/>



corridors, mostly within the northern part of the county. As a result, there can be barriers between a commuter's transit stop and their home. Of the six SCAG counties, Orange County's AllTransit score ranks third, below Los Angeles County (6.8) and San Bernadino (4.4), but above Imperial County (0.1), Riverside (3.3), and Ventura (3.4).

Local Trends

The City of Fullerton is not very accessible by public transit. According to AllTransit, only 2.7 percent of workers in Fullerton take public transportation to work. The city has an AllTransit Performance Score of 4.8, which is higher than the county as a whole but still results in few people taking transit to work.

Metrolink's Orange County line and 91-Perris line run through Fullerton, as well as Amtrak's Surfliner, with a stop at the Fullerton Transit Station. There are also several bus lines operated by OCTA.

Figure E-22 illustrates transit access within a quarter-mile of transit stops for both bus routes and Metrolink. A significant portion of the city is within a quarter-mile access of a transit stop, particularly within the southern half of the city. The northern half of the city has less access to transit. The neighborhoods of Acacia Park, West Coyote Hills, Emery Park, and Amerige Heights have limited access to transit.

Fullerton has some neighborhoods with high walkability. Walk Score is a private company that offers a walkability index on its website, that measures the pedestrian friendliness of a given location by analyzing walking routes to nearby amenities and examining population density and road metrics, including block length and intersection density.¹³ According to Walk Score, Fullerton has a walk score of 54 out of 100, which is categorized as "Somewhat Walkable."¹⁴ Downtown Fullerton has a Walk Score of 97, which is categorized as "Walker's Paradise."

The Environmental Protection Agency (EPA) also has a walkability index, that ranks block groups according to their relative walkability.¹⁵ The EPA walkability map, shown in Figure E-23, shows that most of the city has a walkability score above that national average. The highest walkability scores are generally located in the southern portion of the city, although there are pockets of high walkable neighborhoods scattered throughout the city. Neighborhoods located in the northern area of Fullerton have lower walkability scores compared to the rest of the city.

¹³ Walk Score, 2022. <https://www.walkscore.com/methodology.shtml>

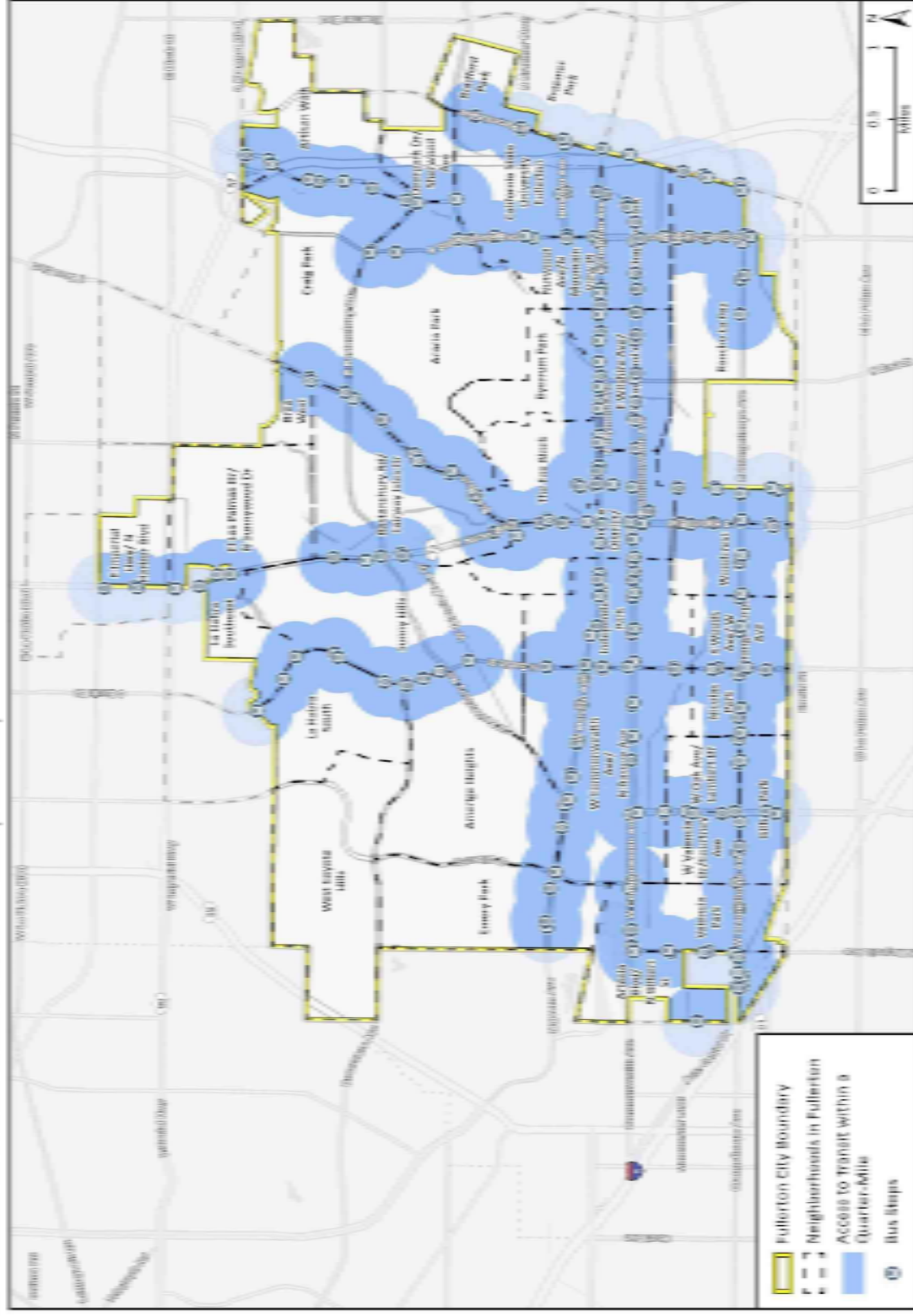
¹⁴ Walk Score, 2022. <https://www.walkscore.com/CA/Fullerton>

¹⁵ EPA, 2021. <https://www.epa.gov/smartgrowth/national-walkability-index-user-guide-and-methodology>



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Figure E-22 Access to Transit Within a Quarter-Mile (Fullerton)





E.6.2 Access to Quality Education

Economics literature has consistently found about a 10 percent increase in wages/salary with each additional year of education.¹⁶ Therefore, educational attainment is directly linked to housing opportunities. To assess educational opportunities by geography, this analysis uses TCAC education domain scores, which incorporate a variety of indicators including math and reading proficiency scores, high school graduation rates, and student poverty rates at the census tract level.

Regional Trends

An overview of education outcomes across Orange County is illustrated in Figure E-24. Educational outcomes varied across Orange County. In general, urban areas in the northwest portion of the county had less positive education outcomes compared with the rest of the county, particularly in Santa Ana, Anaheim, and Placentia. Additionally, the neighborhood of Great Park in Irvine had low educational outcomes compared to the county, however there are limited residential uses in this neighborhood. According to Kidsdata.org, a data compilation program of the Lucile Packard Foundation for Children's Health, Orange County high school graduation rates were highest among Asian-American and Filipino students (95 percent) and white, non-Hispanic students (94 percent). American Indian/Alaska Native students (86 percent) and Hispanic/Latino students (87 percent) had lower graduation rates.¹⁷

Local Trends

Fullerton's youth are served by the Fullerton School District (FSD) and Fullerton Joint Union High School District (Fullerton JUSD). FSD serves kindergarten through eighth grade students in the City of Fullerton. FSD operates 15 elementary schools, two K-8th campuses, and three junior high schools.¹⁸ Fullerton JUSD operates five high schools in Fullerton and serves the City of Fullerton and the cities of La Habra, La Habra Heights, Buena Park, and small sections of Brea and Whittier. The City of Fullerton is also served by 11 private schools that serves kindergarten students through high school.¹⁹ Figure E-25 shows Fullerton's TCAC scores for education outcomes at the census tract level. In general, the southern areas of the city had the lowest degree of positive education outcomes, particularly in the neighborhood of Rancho La Paz. This area also has a high percentage of LMI population, predominant Hispanic majority, and lower median income. The northern portion of the city has more positive educational outcomes. These areas also have high percentages of Asian American and non-Hispanic White residents, higher incomes, and a lower percentage of LMI residents.

¹⁶ Annual Disability Statistics Compendium, 2020. <https://disabilitycompendium.org/annualreport>

¹⁷ Kids Data. 2021. All Data: Orange County. <https://www.kidsdata.org/region/365/orange-county/results#ind=&say=&cat=18>

¹⁸ Fullerton School District. <https://www.fullertonsd.org/domain/6>

¹⁹ City of Fullerton. Private Schools. <https://www.cityoffullerton.com/residents/schools/private-schools>



E.6.3 Economic Outcomes

Housing opportunities are directly related to economic opportunities. Access to high quality employment close to desired and affordable housing results in more housing opportunities and shorter commute times. The analysis for economic opportunities uses TCAC economic indicators, employment participation data from the ACS and the HUD Jobs Proximity Index.

TCAC economic opportunities are measured by census tract. They consider poverty, adult education, employment, job proximity, and median home values. A higher economic index score reflects more positive economic outcomes. The HUD Jobs Proximity Index assesses the accessibility to job opportunities at the census block group level.

Regional Trends

Economic outcomes vary across Orange County as shown in Figure E-26. Areas with more positive economic outcome scores were identified along the coastal communities and in the southern and eastern portions of the county. Conversely, similar to educational outcomes, the urban areas in the northwestern portion of the county had less positive economic outcomes, particularly in Santa Ana, Anaheim, Fullerton, and Buena Park.

According to ACS estimates, Orange County has an employment rate of 60 percent, a decrease of three percent from 2019. Table E-10 shows employment status by disability status estimates for Orange County for ACS 2015-2019 and 2017-2021. Overall, the percent of all employed residents age 16 remained the same, but unemployment increased slightly.

Table E-10 Employment Status by Disability Status (Orange County)

Disability Status	Employed 2015-2019	Unemployed 2015 -2019	Employed 2017-2021	Unemployed 2017-2021
No Disability	1,445,013 (96.7%)	65,384 (91.9%)	1,435,544 (96.3%)	77,022 (91.8%)
With a Disability	48,800 (3.2%)	5,723 (8.0%)	54,620 (3.6%)	6,819 (8.1%)
Total	1,493,813 (74.7%)	71,107 (3.5%)	1,490,164 (74.4%)	83,841 (4.1%)

Source: U.S. Bureau of the Census, ACS Table C18120 Employment Status by Disability Status, 2015-2019, 2017-2021 Estimates.

Local Trends

The TCAC opportunity maps help to identify patterns of negative and positive economic, educational and environmental outcomes across the state. Census tracts are ranked from low (negative outcomes) to highest resource (positive outcomes) based on TCAC’s Opportunity Maps analysis. TCAC economic outcome scores vary across neighborhoods in Fullerton, as shown in Figure E-27.



Generally, lower economic outcomes are located in the southern part of the city south of Commonwealth Avenue. However, the neighborhood California State University Fullerton in the east of the city also has less positive economic outcomes, likely due to the prevalence of students. The E Imperial Hwy/N Harbor Blvd neighborhood is characterized as having less positive economic outcomes, but no residential units are located in this neighborhood. Areas with more positive economic outcomes were in the central and northern portions of Fullerton. Generally, areas with lower economic outcome scores were in neighborhoods with a higher percent of Hispanic/Latino residents, whereas areas with higher economic outcomes had a predominately non-Hispanic white or Asian-American population.

Employment status by disability status estimates is provided in Table E-11. The labor participation rate of residents age 16 and older decreased by one percent, slightly more than the county’s rate of change. The number of employed residents with a disability increased slightly in Fullerton, while employment for residents without a disability decreased. The total unemployment rate (5.6 percent) in 2021 is higher than the county (4.1 percent), but lower than the SCAG region (9.3 percent).

Table E-11 Employment Status by Disability Status (Fullerton)

Disability Status	Employed 2015-2019	Unemployed 2015 -2019	Employed 2017-2021	Unemployed 2017-2021
No Disability	62,864 (96.5%)	4,206 (93.2%)	61,918 (95.8%)	4,768 (93.2%)
With a Disability	2,234 (3.4%)	305 (6.7%)	2,648 (4.1%)	346 (6.7%)
Total	65,098 (72.0%)	4,511 (4.9%)	64,566 (71.0%)	5,114 (5.6%)

Source: U.S. Bureau of the Census, ACS Table C18120 Employment Status by Disability Status, 2015-2019, 2017-2021 Estimates.

According to TCAC, census tracts with a designation of “High Resource” indicate that the census tract has strong educational and economic opportunities for current and future residents. The majority of Fullerton is comprised of moderate to high resource areas. The highest resource areas are concentrated in the central and northern portion of the city. Several neighborhoods in the city are characterized as low resource, including Gilbert Park, Woodcrest Park, and Rancho La Paz. E Imperial Hwy/N Harbor Blvd in the northern tip of the city also is characterized as low resource, but this neighborhood is comprised of commercial and industrial uses and does not contain any residential units.

Access to employment opportunities has a significant impact on the type and size of housing a household can afford. HUD’s Jobs Proximity Index utilizes origin-destination employment statistics to examine the distance from a given neighborhood to all job locations in the Southern California Region and assess the accessibility to job opportunities at the census block group level. Because the size of employment centers and the supply of labor differ across the SCAG region, the distance from any single job location is positively weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location.²⁰

Accessibility to employment opportunities differs across Fullerton is shown in Figure 5-28. Neighborhoods with the highest access to employment opportunity are concentrated in the eastern area of the city, primarily east of Harbor Boulevard, which is closest to the industrial zoned areas of northeastern Anaheim.

²⁰HUD, 2020. <https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf>



Generally, accessibility to jobs decreases relative to the distance from that area, with the lowest scores in the western and southern areas of the city. Neighborhoods with the lowest job proximity scores in the southwestern area of the city are primarily comprised of single-family homes with pockets of commercial, and no industrial uses. Although it may appear counter-intuitive, there are some neighborhoods with higher proximity to jobs, such as Rancho La Paz that the lowest TCAC economic outcome scores and higher rates of LMI populations compared to other areas of the city with lower proximity to jobs. Despite being in close proximity to employment, residents in this area of Fullerton may not benefit from high proximity to job centers, as this area has low TCAC economic outcome scores and a high share of LMI populations.

E.6.4 Healthy and Safe Housing Environment

Healthy Environment in AFFH addresses disparities in access to environmentally healthy neighborhoods by protected class groups. An assessment of environmentally healthy neighborhoods can include air and water quality, safety, environmental hazards, social services, and cultural institutions. Recent California laws—Assembly Bill (AB) 1550, Senate Bill (SB) 535 and SB 1000 emphasize the importance of environmental justice as a fair housing issue. Environmental Justice, according to HUD, means ensuring that people have equal access to safe and healthy housing. HUD requires all entitlement jurisdictions to conduct reviews under the National Environmental Protection Act to determine if a proposed project creates adverse impacts due to environmental conditions. It furthers the requirement that human health deserves equal protection for all people regardless of race, color, national origin, or income. Under Executive Order 12898, Federally assisted projects may also target funding to communities that have disproportionately high and adverse human health impacts on minority and low-income populations due to environmental conditions.²¹ The California Office of Environmental Health Hazard Assessment developed CalEnviroScreen, a mapping tool that uses spatial data collected by various regulatory agencies (e.g., air quality indicators from South Coast Air Quality Management District, water quality indicators from Orange County Water District, monitored chemical releases into the air or water table from Environmental Protection Agency, HUD socioeconomic indicators, etc.). The dataset uses a methodology to identify communities disproportionately burdened by exposures to pollution, environmental effects of existing pollutants in communities, among other indicators of sensitive populations or socioeconomic factors. Residents in census tracts with high CalEnviroScreen scores as compared to other California census tracts (shown as percentiles) are disproportionately burdened by pollution and are more vulnerable to related effects.

²¹ HUD, 2022. <https://www.hudexchange.info/programs/environmental-review/environmental-justice/>



Regional Trends

The CalEnviroScreen map for Orange County identifies the degree to which communities are considered burdened by pollution. Figure E-29 shows that generally, the more urbanized, northwestern portions of the county have less positive environmental outcomes, most notably near the industrial areas in the cities of Buena Park, Stanton, Fullerton, Anaheim, Garden Grove, and Santa Ana.

Local Trends

As shown in Figure E-30, pollution burden varies across Fullerton communities. In general, the northern portion of the city, particularly the neighborhoods of Sunny Hills and Acacia Park, has more positive environmental outcomes than areas south. The neighborhood of E Imperial Hwy/N Harbor Blvd, which contains several distribution centers with high truck traffic, and the neighborhood of Woodcrest Park, which contains large, big box commercial areas that generate car trips, have the worst environmental outcomes within the city. Areas with high pollution tend to have a greater percentage of industrial or commercial land uses. Areas with higher pollution burden are also areas that had higher percentages of Hispanic/Latino residents, as shown in Figure E-30.

According to TCAC, environmental outcome scores vary across the city. Figure E-31 shows that higher environmental health scores are concentrated in western and northeastern Fullerton. Similarly, TCAC shows that the neighborhoods of Sunny Hills and Acacia Park have the highest environmental outcomes in the city. These areas have a high proportion of open space and public lands, and a majority white, non-Hispanic population. Conversely, the neighborhoods with the heavier pollution burden are concentrated in the southeastern portion of the city and have a higher percentage of Hispanic/Latino residents.



E.7 Disproportionate Housing Needs

Disproportionate housing needs refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need, or the total population experiencing that category of housing need in the applicable geographic area. To analyze the extent of disproportionate housing needs in Fullerton, this section reviews data on housing cost burden and severe housing cost burden, overcrowding, homelessness, and substandard housing conditions. Information for this section relies on the HUD CHAS data.

E.7.1 Housing Cost Burden

Housing cost burden is defined as the proportion of a household's total gross income spent on housing costs. Households that spend at least 30 percent of their total gross income on housing costs (rent, mortgage, utilities, and other housing-related costs) are considered "cost burdened," and households spending over 50 percent on housing costs are considered "severely cost burdened." The higher the housing cost burden, the more likely residents are to live in overcrowded and substandard conditions and are less likely to afford to relocate. Low-income households and persons in protected classes disproportionately experience severe housing problems.

Regional Trends

Figure E-32 shows areas of Orange County where renter households experienced housing cost burden (spending more than 30 percent of household income on housing costs). As shown, paying more than 30 percent of gross income on rent is widespread across most of Orange County, where a significant portion of the county have between 40 and 80 percent of renter households pay more than 30 percent or more of household incomes on rent. There are a few census tracts in the county where over 80 percent of renter households pay more than 30 percent or more of household incomes on rent, particularly within the urbanized northern portion of the county including within the cities of Yorba Linda, Placentia, Orange, and Fountain Valley. Additionally, the less urbanized coastal community of Laguna Niguel has high levels of overpayment. Overpayment amongst homeowners is also widespread across the county, as shown in Figure E-33. Housing cost burden among homeowners is most prevalent in the northwestern area of the county, especially in the cities of Placentia, Anaheim, Westminster, and Santa Ana.

Local Trends

Similar to Orange County, housing cost burden among renters varies across Fullerton. As Shown in Figure E-34, most neighborhoods in Fullerton have between 40 and 80 percent of renters experiencing housing cost burden, according to 2017-2021 ACS estimates. The neighborhoods with higher rates of cost burden (60 and 80 percent of renters) include Brea West, Craig Park Artisan Walk, California State University, and Bradford Park, located in the northeast of the city, and Valencia Park, W Valencia Dr/Courtney Ave, S Woods Ave/W Orangethorpe Ave, located in the southwest of the city. The neighborhood with the lowest rates of overpayment by renters (less than 20 percent) is West Coyote Hills.

Housing cost burden among owner-occupied households varies across the city. An overview of housing cost burden for owner-occupied households is provided in Figure E-35. In most of the city, between 20 and 60 percent of owner-occupied households are cost burdened. The neighborhood of Emery Park has the highest percentage of cost burdened households within the city (between 60 and 80 percent). Areas with the highest cost burden generally have higher percentages of Asian American, non-Hispanic, and

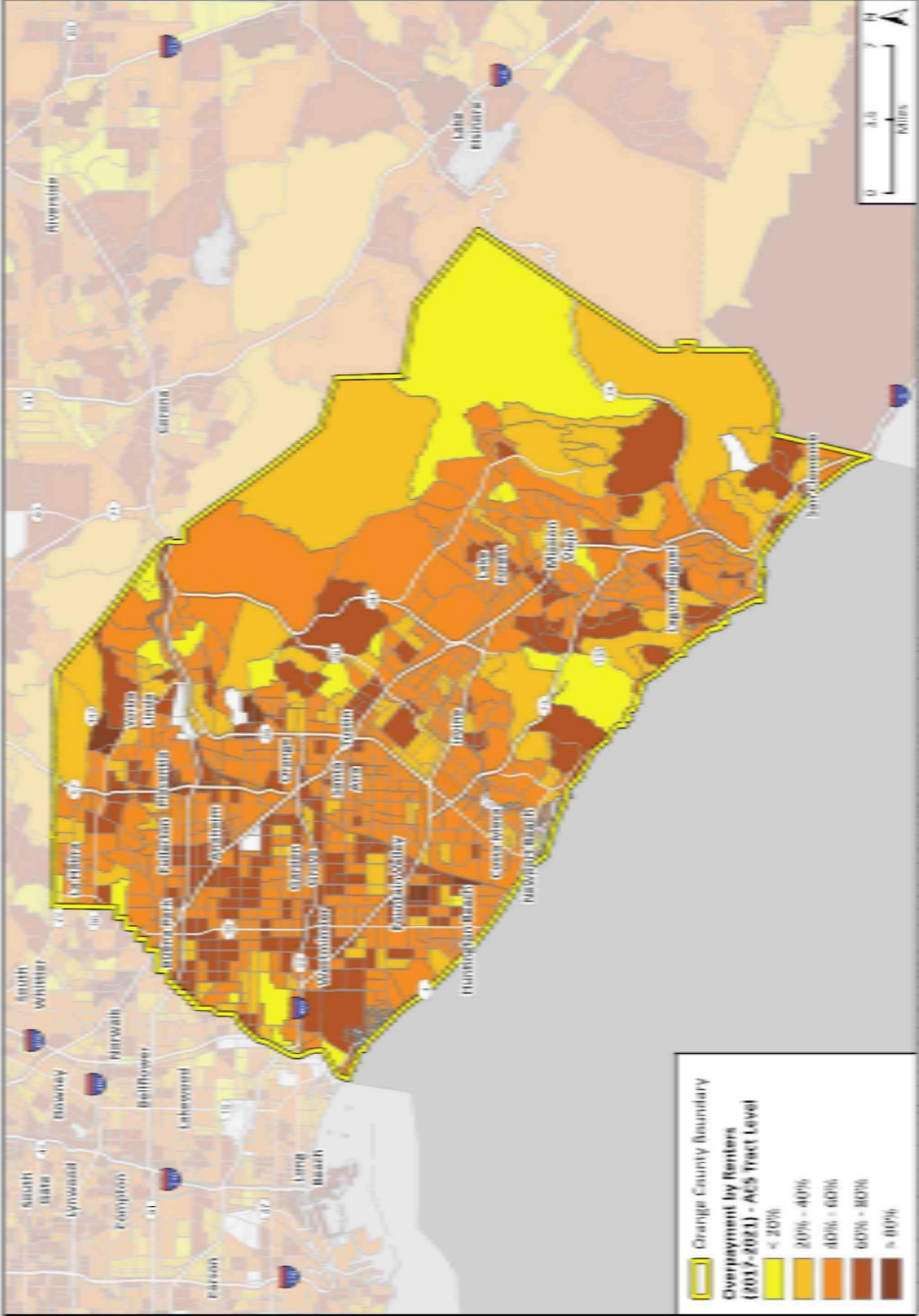


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Hispanic/Latino populations. The California State University Fullerton neighborhood has between 40 and 60 percent of owner-occupied households are cost burdened; however, this neighborhood also has a significantly lower percentage of owner-occupied units than the city as a whole (13 percent, compared to 50 percent for the entire city).

Nine neighborhoods within Fullerton contain between 60 and 80 percent of cost burdened renters. As shown in Figure E-36, three of these neighborhoods have a majority non-Hispanic white population, and six of these neighborhoods had a majority Hispanic/Latino population. The lowest rate of overpayment by renters was in the West Coyote Hills neighborhood in the northwest corner of the city, which is predominantly Asian American.

Figure E-32 Overpayment by Renters (Orange County)



Map of Orange County of the Orange County State Parks, Fair Hills, Mariani, and Orange and Newport State Parks. Bureau of Land Management, PAC, RPA, July 2015-2019; FRED, PERRINSON 2012; HUD Region V 2012; American Community Survey, OC Berkeley Urban Displacement Project, TCAC 2012; Colwell/Levine 4/3, 2011

Source: APFH Viewer, 2022

