



# REGIONAL ASSESSMENT OF FAIR HOUSING

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# REGIONAL ASSESSMENT OF FAIR HOUSING

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Assembly Bill (AB) 686 requires that all housing elements due on or after January 1, 2021, contain an Assessment of Fair Housing (AFH) consistent with the core elements of the analysis required by the federal Affirmatively Furthering Fair Housing (AFFH) Final Rule of July 16, 2015. Under California law, AFFH means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”<sup>1</sup>

California Government Code Section 65583 (10)(A)(ii) requires local jurisdictions to analyze racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. Government Code Section 65583(c)(10) requires all local jurisdictions to address patterns locally and regionally to compare conditions at the local level to the rest of the region. To that end, a Multijurisdictional Housing Element was completed for the cities of Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, Selma, and the County of Fresno, including a regional AFH, and each participating jurisdiction prepared a local AFH.

This section is organized by fair housing topics and is analyzed on a regional level. A local analysis, prioritization of issues, and identification of meaningful actions is included in each jurisdictions’ Local Assessment of Fair Housing.

## OUTREACH

As discussed in Section 1-3, Public Outreach and Engagement, the Fresno Council of Governments (COG) made diligent efforts at the regional and local scales to encourage public and service-provider participation, particularly service providers for vulnerable populations, during the Housing Element update process. These efforts included two Housing Element community workshops on August 1 and 8, 2022; a Stakeholder Focus Group workshop on October 25, 2022; and seven regional service provider consultations between August 2022 and November 2022. Workshops were noticed in the jurisdiction where they were held with digital distribution of English and Spanish flyers through listservs and social media posts, and physical distribution in public buildings. A full summary of each workshop is provided in the local Assessment of Fair Housing. Stakeholder focus group meetings were noticed to service providers and local agencies identified by governmental staff throughout the county and to any other organizations that expressed interest.

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<sup>1</sup> California Department of Housing and Community Development, *Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements (April 2021 Update)*, April 27, 2021, preface page, [https://www.hcd.ca.gov/community-development/affh/docs/affh\\_document\\_final\\_4-27-2021.pdf](https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf).

## Consultations

From August 2022 through November 2022, seven consultations were conducted with local nonprofits and service providers for vulnerable populations and fair housing advocates to receive one-on-one, targeted input from those who provide services for those most in need of housing or with special housing needs. In each of the consultations, service providers and fair housing advocates were asked some or all the following questions, depending on the type of organization they represented.

**Opportunities and concerns:** What three top opportunities do you see for the future of housing in Fresno County? What are your three top concerns for the future of housing?

**Housing preferences:** What types of housing do your clients prefer? Is there adequate rental housing in the county? Are there opportunities for home ownership? Are there accessible rental units for seniors and persons with disabilities?

**Housing barriers/needs:** What are the biggest barriers to finding affordable, decent housing? Are there specific unmet housing needs in the community?

**Housing conditions:** How do you feel about the physical condition of housing in the county? What opportunities do you see to improve housing in the future?

**Unhoused persons:** How many unhoused persons are in the county?

**Housing equity and fair housing:** What factors limit or deny civil rights, fair housing choice, or equitable access to opportunity? What actions can be taken to transform racially and ethnically concentrated areas of poverty into areas of opportunity (without displacement)? What actions can be taken to make living patterns more integrated and balanced?

As part of the regional effort, the following organizations provided responses:

- Leadership Council for Justice and Accountability, August 26, 2022
- Central Valley Urban Institute, September 7, 2022
- Fair Housing of Central California, September 27, 2022
- Fresno Madera Continuum of Care, October 3, 2022
- Patience Milrod, Civil Rights Attorney, October 31, 2022
- Resources for Independence Central Valley, November 1, 2022
- Building Industry Association, November 11, 2022

The one-on-one interviews with service providers and fair housing advocates raised observations and concerns related to housing issues facing the residents of Fresno County, with several common themes emerging. First was the demand for a range of affordable and accessible housing types for the large concentration of special needs populations in the county, including seniors, farmworkers, low-income households, and disabled persons. The need for additional affordable rental housing and higher densities was identified by most interviewees. Additionally, service providers noted a shortage of housing resources for those who are experiencing homelessness and lack of re-integration services given the growing demand, specifically a need for housing-first projects across the county. This was noted in addition to growing populations of lower-income households at risk of displacement and unsheltered homeless residents. Therefore, identifying locations for alternative housing in the jurisdictions is a priority.

Stakeholders also identified a need for stronger strategies for the preservation and maintenance of the existing affordable housing stock, particularly mobile homes, which are a more naturally affordable housing resource. They expressed how income constraints often result in people living in substandard or overcrowded housing conditions, most often in rental situations, which often results in displacement and homelessness. Service providers and fair housing advocates also identified that there are substantial racial disparities in housing condition among communities of color, recommending that jurisdictions implement proactive code enforcement to hold landlords accountable, or pass ordinances that protect tenants from substandard living conditions. The shortfall of funding programs for mobile home renovation was reiterated in several of the interviews. During the consultations, service providers and fair housing advocates expressed a need for proactive tenant protections, such as rent control, just-cause protections, and other housing protection laws to keep more individuals housed, because eviction is the most common fair housing complaint encountered by service providers and fair housing advocates. In situations such as this, tenants require access to additional legal assistance to prevent displacement due to harassment or wrongful eviction, and landlords require education on the legality of their actions.

Multiple stakeholders also identified a trend of mobile homes being acquired by corporations, resulting in tenant evictions or substantial rent hikes. In response to this situation, stakeholders suggested that implementation or funding of programs to assist tenants to purchase their mobile homes, co-op purchase assistance, and long-term affordability covenants or rent control requirements in mobile home park buy-outs are essential to maintaining this affordable housing resource throughout the county. Additionally, they expressed that limited land zoned to accommodate mobile home parks in higher resource areas is an ongoing challenge to the provision of affordable housing in unincorporated areas, where higher density multifamily is not appropriate.

During consultations, service providers and fair housing advocates identified a need for landlord education and enforcement regarding fair housing laws and rental discrimination practices, in combination with jurisdictions contracting with fair housing providers for a comprehensive system to identify affordable housing resources and tenant protection, particularly for seniors, disabled persons, gender equality, familial status, and communities of color. Stakeholders identified a need for workshops on fair housing laws for residents and housing providers. The goal of these would be to inform housing providers of their rights and responsibilities under fair housing laws and provide education on discrimination, aiming to reduce the number of instances that result in fair housing complaints throughout the county. A tenant workshop counterpart was suggested to inform residents of their tenant rights.

### SECTION 3: REGIONAL ASSESSMENT OF FAIR HOUSING

Barriers identified to development of affordable housing included land costs, the length of entitlement processes, California Environmental Quality Act (CEQA) requirements, development fees, and other permitting processes, compounded by severe infrastructure constraints, particularly sewer and septic systems and the valleywide water shortage. All housing providers interviewed expressed that new low-income housing is not cost effective for developers, and that properties owned by jurisdictions are a valuable resource for providing lower-income housing, including homeownership opportunities through organizations, such as Habitat for Humanity, that assist communities of color to attain homeownership, a group that has historically been underserved in the homeowner market. Another strategy identified to reduce costs of affordable development included adaptive reuse of existing underutilized buildings or property and maximizing infill opportunities where infrastructure is already in place, instead of focusing investment at the fringes of communities as is the current trend. The aim of this is to remedy historical disinvestment in older, lower-income neighborhoods and downtown cores. Interviewees identified that socioeconomic segregation does exist in Fresno County, and the majority of affordable housing continues to be located in low resource areas. In response, stakeholders noted that the primary strategy to reduce racially or ethnically concentrated areas of poverty has been implementation of inclusionary zoning, which is a controversial tool in many communities and has not been consistently effective at promoting affordable housing production in higher resource areas. Incentivizing and subsidizing the construction of ADUs on existing residential properties was recommended to help address the barriers associated with cost of land and shortage of available acreage for development of units for lower-income, farmworker, and senior households as well as persons with disabilities. Additionally, stakeholders recommended that jurisdictions explore the potential to assist rental property owners in working with nonprofits or the Fresno Housing Authority to acquire properties about to go into receivership and convert them to affordable housing. One housing provider also discussed Community Land Trusts as an underutilized opportunity to create permanent affordability as well as the availability of CalHome funding for implementing this option.

A final recurring theme around barriers to affordable housing that service providers and fair housing advocates identified was the current and historical challenges lower-income households face in obtaining financial assistance, such as lending discrimination, rental application and minimum income requirements, credit history, and security deposits. Additionally, it was also noted overall that there is a disconnect between the number of applicants for Housing Choice Vouchers (HCVs) and the availability of units that accept them, in addition to an insufficient supply of HCVs and the long waiting lists throughout the county. Education and outreach efforts of current fair housing practices to landlords and sellers were recommended.

Feedback received during the regional consultations was shaped by individual discussions and the experiences of each service provider, fair housing advocate, or community organization. Therefore, some questions did not receive direct responses, but instead focused on feedback they deemed relevant to their target population or experiences. The summary presented here reports feedback that was received and incorporated to inform the regional and local analyses as well as programs at the local level.

## Stakeholder Focus Group Workshops

Two Stakeholder Focus Group workshops were held to foster participation from Fresno County jurisdictions, local organizations, and service providers for vulnerable populations. The first was held via Zoom on October 25, 2022, at 9:30 am, so participants could connect or call in from wherever they were located. The objectives of the meeting were to provide an overview of the Housing Element Update process; share initial findings about housing needs that inform each jurisdiction's housing plan; and gather initial community input on housing assets, issues, and opportunities as well as allow participants to share their insights on how housing opportunities can be improved locally and on a regional level. Many of the participants had been or were scheduled for individual interviews. There were eight participants in the first workshop as well as staff from each jurisdiction to engage and answer questions.

Workshop discussion focused on mobile home park issues and their place in Fresno County as an affordable housing resource that is facing corporate acquisition; farmworker and undocumented worker housing and the invisibility of this extremely underserved population; preventative displacement actions; and barriers to affordable housing in unincorporated areas, in particular the lot-consolidation policy. Overall, the primary fair housing concerns were the costs associated with development of housing, particularly affordable units; shortages of affordable housing and HCV)availability; limited opportunities for employment that offers livable wages and the prevalence of this in many of the agricultural- and manufacturing-based communities; housing challenges facing lower-income renters and first-time homebuyers; and providing housing opportunities for underserved populations, particularly farmworkers.

A second Stakeholder Focus Group workshop was held on Tuesday, November 15, at 9:30 am, again through Zoom. The objectives of the Stakeholder Focus Group meeting were the same as the first workshop. Twelve participants attended, and many of the participants had been or were scheduled for individual interviews.

The workshop began with a discussion regarding the challenges that lower-income individuals just over the area median income limit for certain programs and housing are facing in finding affordable rentals and in purchasing housing without down-payment or other forms of assistance. On the topic of affordable ownership options, one participant provided insight into sweat equity program models, how there are limitations for larger-sized households, and that time commitments often conflict with employment schedules. Another participant noted that there may be programs to assist potential homeowners acquire a home, yet they may not have the funds to maintain the property, particularly in cases where the home is older. Participants talked about the challenges lower-income households face in general to meet the requirements to qualify for rental housing. The issue of affordable housing often being in areas with limited access to services and amenities was cited by several stakeholders. One stakeholder identified an affordable housing project being developed in an environmentally unsound location in a low resource area, which is not furthering the fair housing objective of providing access to resource opportunities. Another stakeholder suggested that data on homelessness in the county may be undercounted, because homeless persons within the Asian and Pacific Islander communities tend to "couch surf" because the services and the food at shelters are not culturally compatible. Such implications of cultural differences in providing services for the homeless are typically not addressed in the larger picture of the homeless issue.



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Discussion on barriers to provision of affordable housing included cost of land; tax credits and other state funding programs that trigger prevailing wage requirements and significantly increase the cost of production; inflation increasing price and availability of materials; city/county fees; infrastructure costs; special district fees; rising interest rates; CEQA requirements; and overregulation by the state, all of which are passed on to the end user. The issue of water shortage and ability to meet RHNA allocations were also identified as constraints that are particularly limiting in many of the jurisdictions in Fresno County. Several of the stakeholders indicated that they would be able to provide updated information on real estate prices and experience working with undocumented (non-citizen or non-permanent resident status) home buyers to help them access alternative financing.

The feedback received during these meetings informed the fair housing analysis and programs identified in this Housing Element.

### FCOG Transportation Needs Survey

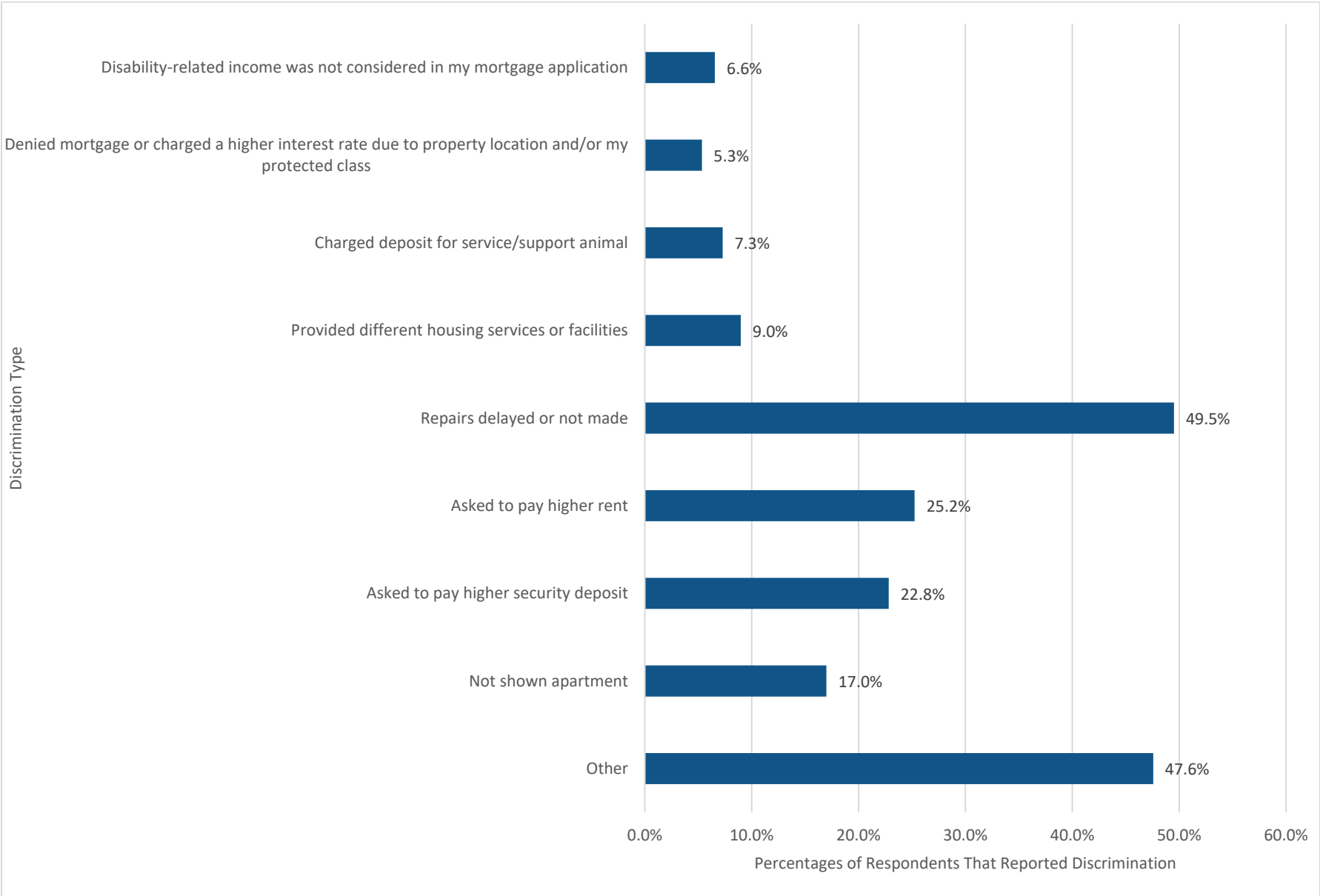
An FCOG survey was conducted between September and October 2022 to identify transportation project suggestions based on the experiences of residents throughout the county. While the survey asked a range of questions related to transportation, it also resulted in information about mobility options, residents' housing and discrimination experiences, barriers to homeownership, and housing type preferences that inform fair housing needs in the county.

There were a total of 3,753 respondents, of whom approximately 45.5 percent were homeowners and 47.0 percent were renters. The remaining 7.5 percent declined to respond or lived in situations where there was no rent or mortgage. Although approximately one-half of respondents were renters, the majority of respondents (68.7 percent) resided in a single-family detached or attached unit. Respondents were, for the most part, lower to moderate income based on HUD's area median income of \$72,900.

Approximately 89.0 percent of survey respondents reported that they had not experienced any type of housing discrimination. However, of those that had experienced discrimination, the most prominent issue reported was requests for repairs being delayed or ignored (47.5 percent), followed by paying higher rents (25.2 percent) or higher security deposits (22.8 percent) (see **Figure 3-1, Discrimination Experienced in Housing**). In addition to these challenges, approximately 72 respondents, or 47.6 percent of those that had experienced housing discrimination, reported a range of other issues, such as real estate agents pushing homes in less desirable areas or hostile living environments. Of those that had experienced discrimination, approximately 41.7 percent, by far the largest proportion, alleged that the discrimination was on the basis of race, followed by source of income (29.4 percent) and family status (23.5 percent) (see **Figure 3-2, Discrimination Basis**). While these reports have not been investigated, they indicate a perceived barrier to housing, particularly for lower-income and non-White households.



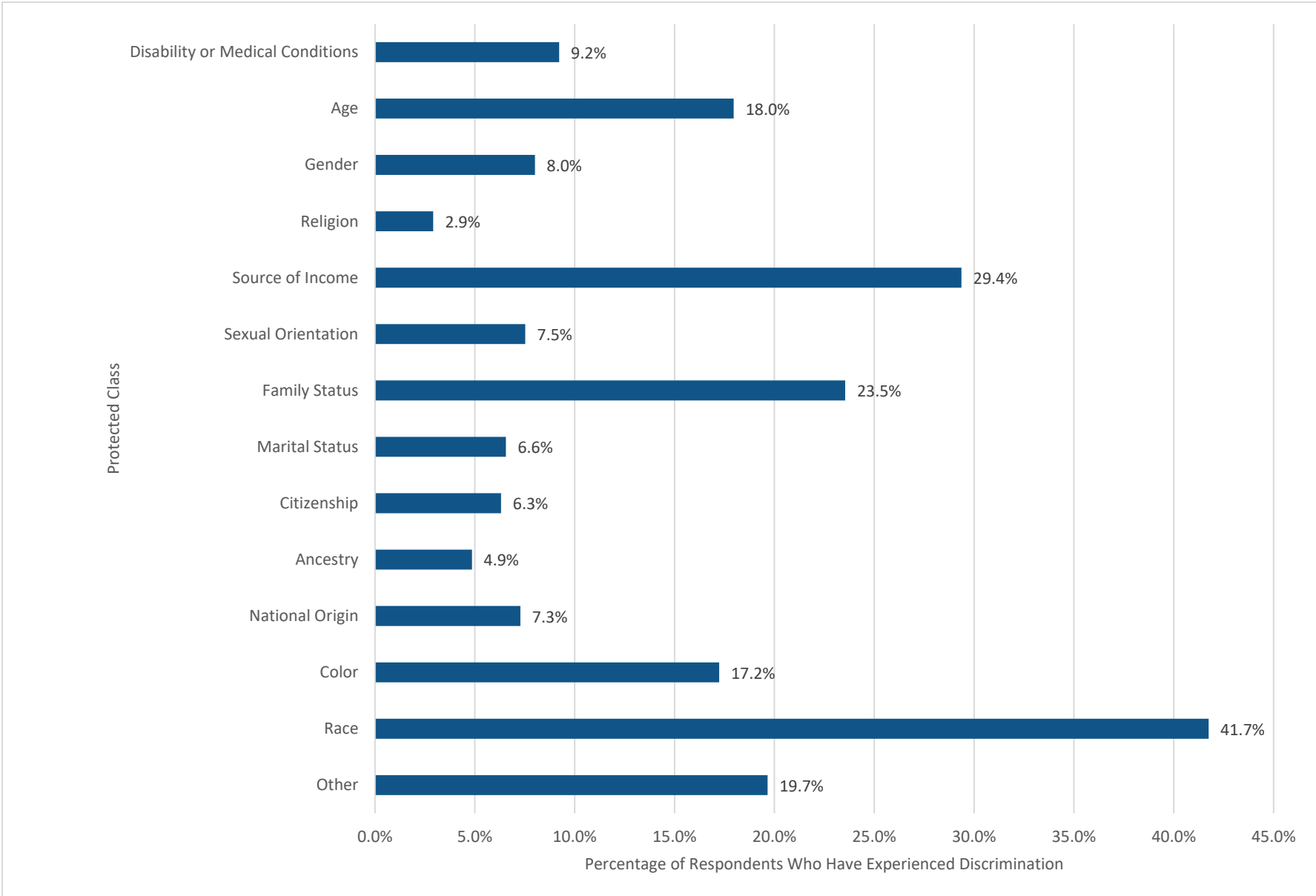
FIGURE 3-1 DISCRIMINATION EXPERIENCED IN HOUSING



Source: FCOG Travel Survey, October 2022.

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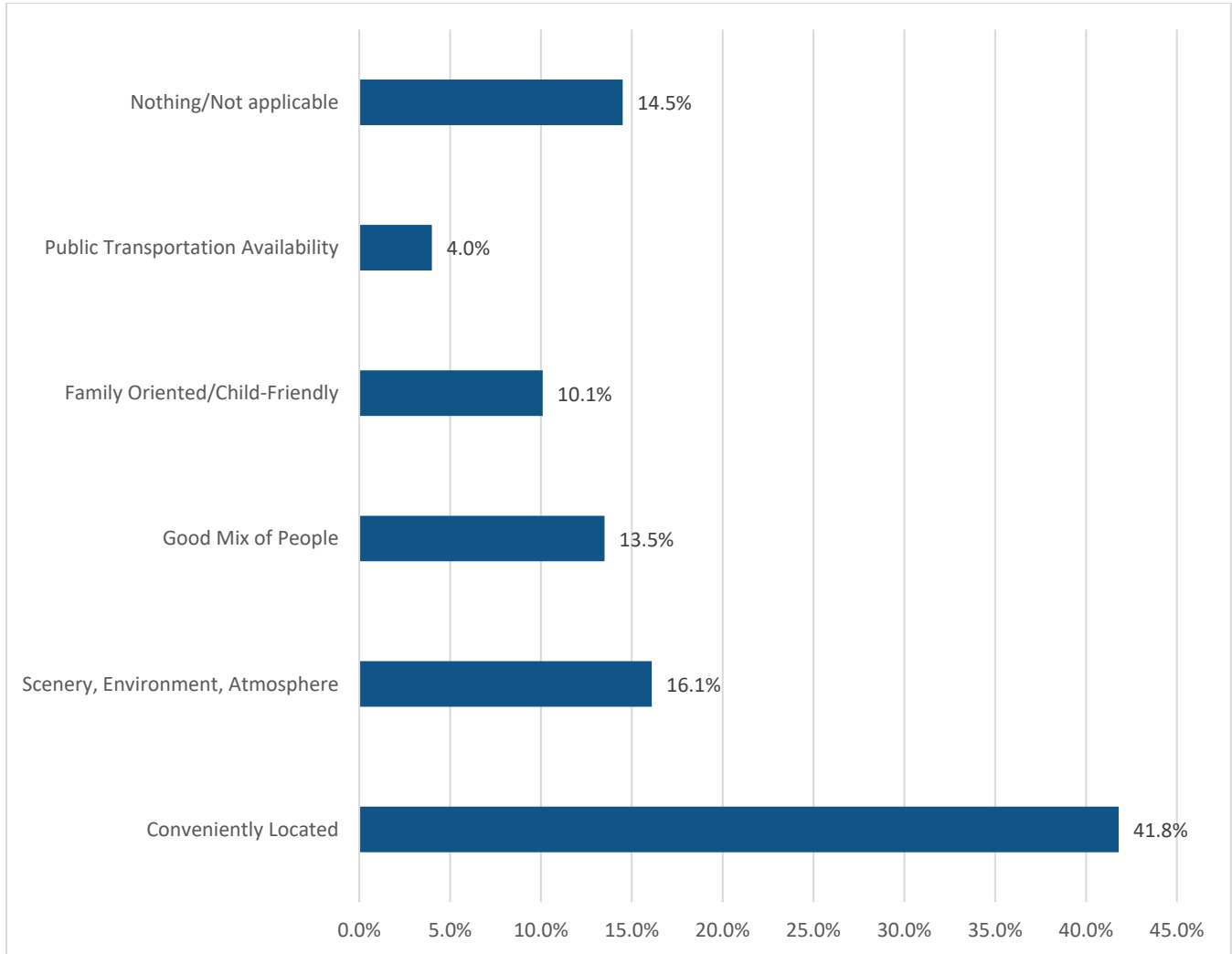
FIGURE 3-2 DISCRIMINATION BASIS



Source: FCOG Travel Survey, October 2022

When asked what participants found most appealing in their current neighborhood, proximity to educational facilities, shopping, or employment ranked the highest at 41.8 percent, followed by atmosphere and physical features, as shown in **Figure 3-3, Most-Liked Feature of Current Neighborhood**. Less than 5 percent of respondents identified proximity to public transportation as their preferred aspect about their neighborhood, which may reflect a lack of mobility opportunities or a low desire for alternatives to automobile transportation.

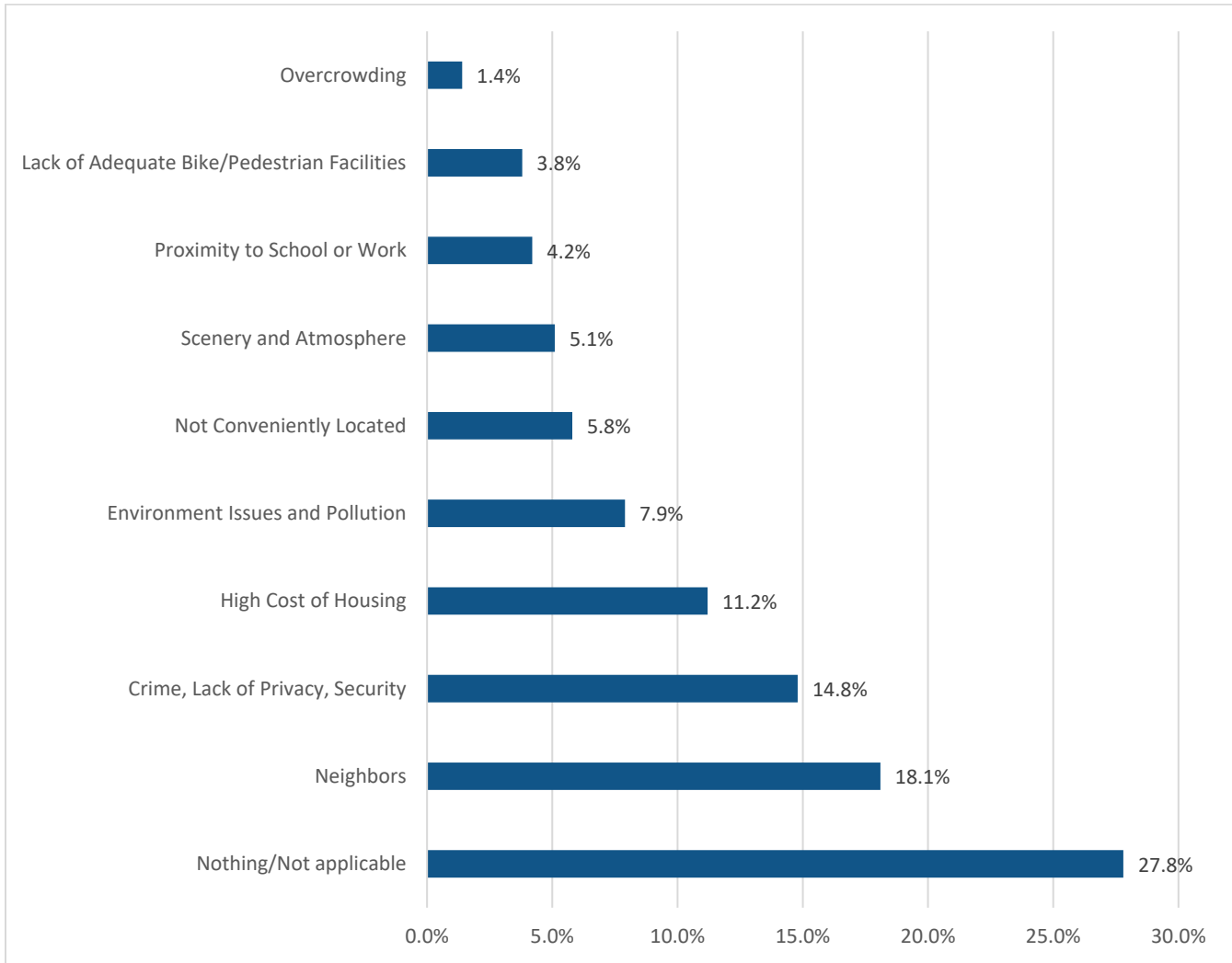
**FIGURE 3-3 MOST-LIKED FEATURE OF CURRENT NEIGHBORHOOD**



Source: FCOG Travel Survey, October 2022.

Approximately 25.0 percent of respondents identified their favorite aspect of their current neighborhood was the residents; conversely, 18.1 percent of respondents said that their neighbors were their least-liked aspect of their current neighborhood, followed by crime, lack of privacy, or security (14.8 percent), as shown in **Figure 3-4, Least-Liked Feature of Current Neighborhood**. The high cost of housing was identified by 11.2 percent of respondents as a least-liked feature, followed by lack of access to public transportation, shopping, schools, or employment for a combined 10.0 percent of responses. Overcrowding was reported as an issue by only 1.4 percent of respondents, suggesting that dwellings were available to fit their household needs within their ability to pay.

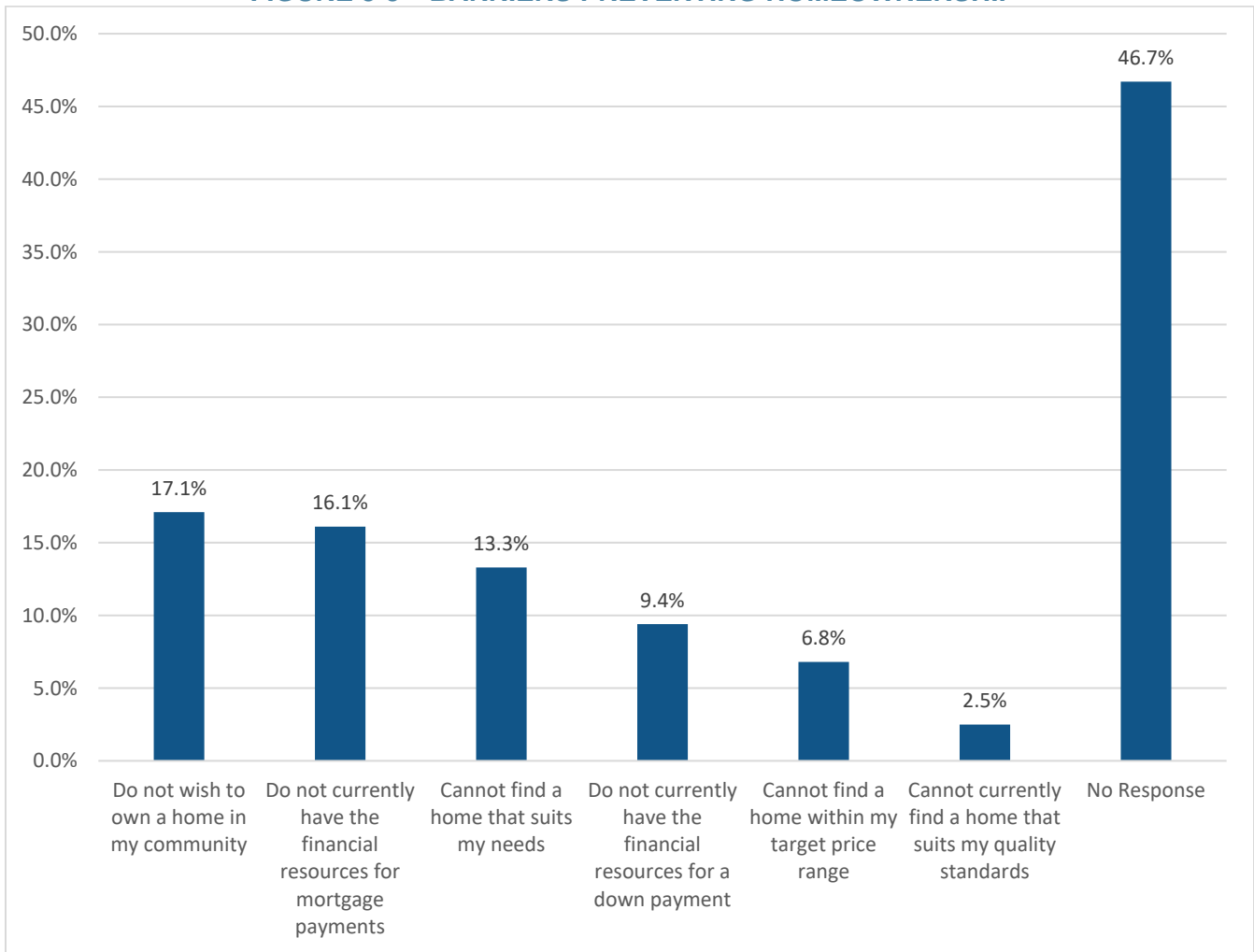
**FIGURE 3-4 LEAST-LIKED FEATURE OF CURRENT NEIGHBORHOOD**



Source: FCOG Travel Survey, October 2022.

Participants were also asked if they had encountered barriers preventing home ownership, shown in **Figure 4-5, Barriers Preventing Ownership**. Of the respondents who wished to own a home, the most common barriers to home ownership were related to financial challenges, including lack of financial resources for assuming a monthly mortgage payment, and finding a home that suited the household’s needs (i.e., lack of disability accommodations, proximity to work), followed closely by lack of down payment resources and finding a home within one’s budget. Overall, 45.6 percent of responses to this question centered around financial challenges in the current market, suggesting a need for additional housing at affordable price points and more information regarding available subsidies and financial assistance programs.

FIGURE 3-5 BARRIERS PREVENTING HOMEOWNERSHIP



Source: FCOG Travel Survey, October 2022.

Responses to the survey indicated a need for greater access to fair housing legal services, education for landlords on fair housing laws, and place-based revitalization efforts such as improved bicycle and pedestrian infrastructure, transit access, and safe and affordable housing. A full analysis of all responses to the FCOG Transportation Needs Survey are in Section 1 of the Housing Element.

## Public Comments

To date, one letter has been received from the public on the Fresno County Multijurisdictional Housing Element. On September 29, 2022, the Leadership Council for Justice and Accountability (LCJA) shared a letter recommending holding interactive housing element workshops in at least three disadvantaged unincorporated communities (DUC) and lower-income communities, emphasizing that people in these areas are more likely to attend in their own communities due to transportation challenges. LCJA also identified a need for targeted outreach to members of special needs populations and protected classes, including but not limited to farmworkers, seniors, members of large families and single-headed households, and people of color and non-English speakers, and recommended multilingual noticing through a variety of mechanisms, including print media, radio, and television. The LCJA also recommended that jurisdictions ensure that strong public engagement efforts are maintained following jurisdictions' adoption of the element and that jurisdictions consider expansion of local funding opportunities for farmworker housing in unincorporated county; local rent stabilization ordinances; tenant protections to reduce displacement risks, including just-cause eviction and right to counsel guarantees; permanent emergency rental assistance program for those at risk of homelessness; investments in mobile home parks; inclusionary housing ordinance; acquisition and rehabilitation funding; and other programs that might be considered by individual jurisdictions.

As with feedback received through the consultation process, input through public comments was received to inform policies and actions to address fair housing concerns and housing needs generally. Public comment will continue to be solicited, considered, and incorporated throughout the update process.

## FAIR HOUSING ISSUES

Since 2017, the California Tax Credit Allocation Committee (TCAC) and Department of Housing and Community Development (HCD) have developed annual maps of access to resources such as high-paying job opportunities; proficient schools; safe and clean neighborhoods; and other healthy economic, social, and environmental indicators to provide evidence-based research for policy recommendations. This effort has been dubbed “opportunity mapping” and is available to all jurisdictions to assess access to opportunities within their community.

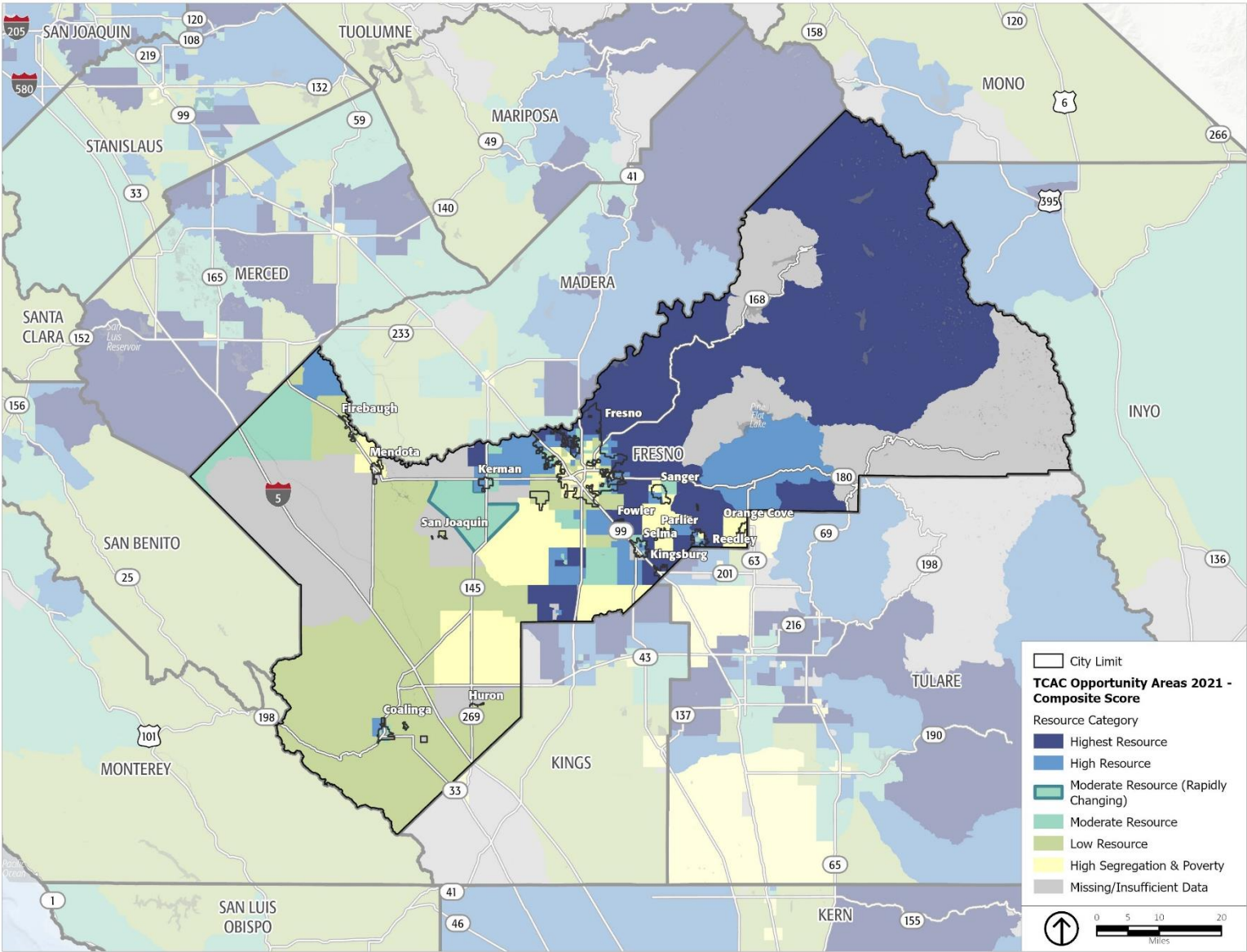
The TCAC/HCD Opportunity Maps can help to identify areas within the community that provide strong access to opportunity for residents or, conversely, provide low access to opportunity. The information from the opportunity mapping can help to highlight the need for housing element policies and programs that would help to remediate conditions in low-resource areas and areas of high segregation and poverty and to encourage better access for lower-income households and communities of color to housing in high-resource areas. TCAC/HCD categorized census tracts into high-, moderate-, or low-resource areas based on a composite score of economic, educational, and environmental factors that can perpetuate poverty and segregation, such as school proficiency, median income, and median housing prices. The TCAC/HCD Opportunity Maps use a regional index score to determine categorization as high, moderate, and low resource.

Areas designated as “highest resource” are the top 20-percent highest-scoring census tracts in the region. It is expected that residents in these census tracts have access to the best outcomes in terms of health, economic opportunities, and education attainment. Census tracts designated “high resource” score in the 21st to 40th percentile compared to the region. Residents of these census tracts have access to highly positive outcomes for health, economic, and education attainment. “Moderate resource” areas are in the 41st to 70th percentile and those designated as “moderate resource (rapidly changing)” have experienced rapid increases in key indicators of opportunity, such as increasing median income, home values, and an increase in job opportunities. Residents in these census tracts have access to either somewhat positive outcomes in terms of health, economic attainment, and education; or positive outcomes in a certain area (e.g., score high for health, education) but not all areas (e.g., may score poorly for economic attainment). Low-resource areas are those that score above the 70th percentile and indicate a lack of access to positive outcomes and poor access to opportunities. The final designation are those areas identified as having “high segregation and poverty;” these are census tracts that have an overrepresentation of people of color compared to the county as a whole, and at least 30.0 percent of the population in these areas is below the federal poverty line (\$27,759 annually for a family of four in 2021).

As seen in **Figure 3-6, Regional TCAC/HCD Opportunity Areas**, most of Fresno County, particularly in the incorporated cities, is primarily a mix of low-resource or moderate-resource areas and areas of high segregation and poverty, with pockets of high-resource designations. The City of Fresno, as the largest city in the county, has the greatest variation in resource area designations among the incorporated cities of Fresno County. The central portion of the city is designated as low resource and high segregation and poverty, with moderate and high resource designations in the newer suburban communities along the northern and eastern edges of the city, including a pocket of unincorporated county that is surrounded by the incorporated city, designated as highest resource. In contrast, the adjacent City of Clovis is designated high resource with pockets identified as moderate resource. Two cities to the south along State Route 99 (SR 99), Fowler and Kingsburg, are designated as high resource, while Selma is designated an area of high segregation and poverty adjacent to SR 99, with moderate and high resource designations identified in the eastern portion. Additionally, the eastern cities of Sanger and Reedley all contain areas identified as high segregation and poverty in addition to moderate and high resource designations. Both Parlier and Orange Cove east of SR 99 are identified as predominantly areas of high segregation and poverty and low resource, as well as Mendota, Firebaugh, San Joaquin, and Huron in the eastern portion of the county. The City of Kerman, just east of the City of Fresno, and the City of Coalinga at the western edge of the county, are designated moderate and high resource. In the unincorporated county, high and highest resource areas are generally in the northeast and eastern portions of the county, including the unincorporated community of Squaw Valley, although most of the land is included within the Sequoia and Kings Canyon National Parks and is predominantly rural and sparsely inhabited, with pockets of higher resource designations in the unincorporated communities of Caruthers and Riverdale along State Route 41 (SR 41). Lower resource and areas of high segregation and poverty are identified in the western unincorporated areas of the county. Moderate-resource areas elsewhere, concentrated west of Fresno and within the triangle formed by SR 41, the southern boundary of the county, and SR 99. Given that much of unincorporated Fresno County is sparsely populated, with large agricultural and natural open space areas, the low- and moderate-resource areas may not accurately represent the access to opportunities for residents of unincorporated communities, where there is typically a concentration of resources.



FIGURE 3-6 REGIONAL TCAC/HCD OPPORTUNITY AREAS



Source: TCAC/HCD, 2021

## Patterns of Integration and Segregation

Segregation exists when there are concentrations of a population, usually a protected class, in a certain area. Segregation can result from local policies, to the availability and accessibility of housing that meets the needs of that population, or a community culture or amenity that attracts the population. In the context of fair housing, segregation may indicate an issue where it creates disparities in access to opportunity, is a result of negative experiences such as discrimination or disproportionate housing need, or other concerns. Integration, in contrast, usually indicates a more balanced representation of a variety of population characteristics and is often considered to reflect fair housing opportunities and mobility.

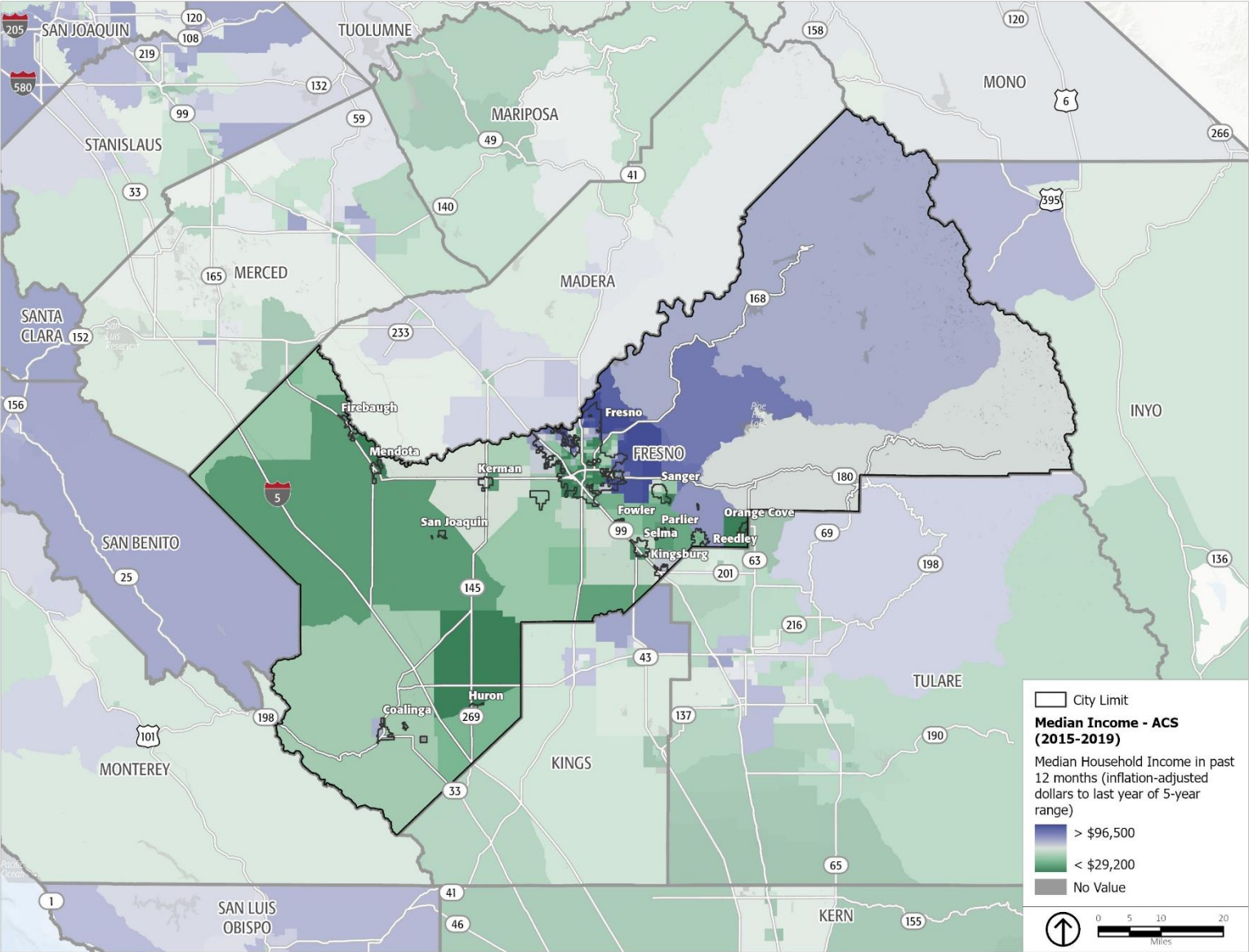
As identified in the previous discussion, a large portion of the City of Fresno; the rural area around the unincorporated community of Raisin City; a rural and agricultural tract north of Huron and one east of the Riverdale unincorporated community; the unincorporated area between, and including tracts within the cities of Sanger, Parlier, Orange Cove, and Mendota; and the unincorporated area north of the City of Mendota to the edge of the City of Firebaugh, are designated as areas of high segregation and poverty.

This analysis assesses four characteristics that may indicate patterns of integration or segregation throughout the region and local Fresno County jurisdictions: income distribution, racial and ethnic characteristics, familial status, and disability rates.

### ***Income Distribution***

At the regional level, income distribution can be measured between jurisdictions. **Figure 3-7, Income Patterns in the Region**, presents the spatial distribution of income groups in Fresno County and surrounding San Joaquin Valley jurisdictions. There are concentrations of higher-income households in the City of Clovis, in the northern and southern portions of the City of Fresno (inclusive of unincorporated county islands, which are unincorporated neighborhoods surrounded by the incorporated municipality, and unattached to other unincorporated areas). On maps, these geopolitical anomalies will form jagged or complex borders and 'holes' in the city limits), in the eastern portion of the county, and in unincorporated areas surrounding the cities of Kingsburg, Selma, and Sanger. In surrounding counties, concentrations of higher-income households are found in the portion of Kings County northeast of the City of Hanford and in Tulare County in northern Visalia, north of the community of Woodlake, east of the City of Tulare, and in the sparsely populated Sequoia National Park area in the eastern portion of Tulare County. The neighboring Merced, San Benito, Monterey, and Madera Counties to the north and west generally reflect moderate and lower median incomes.

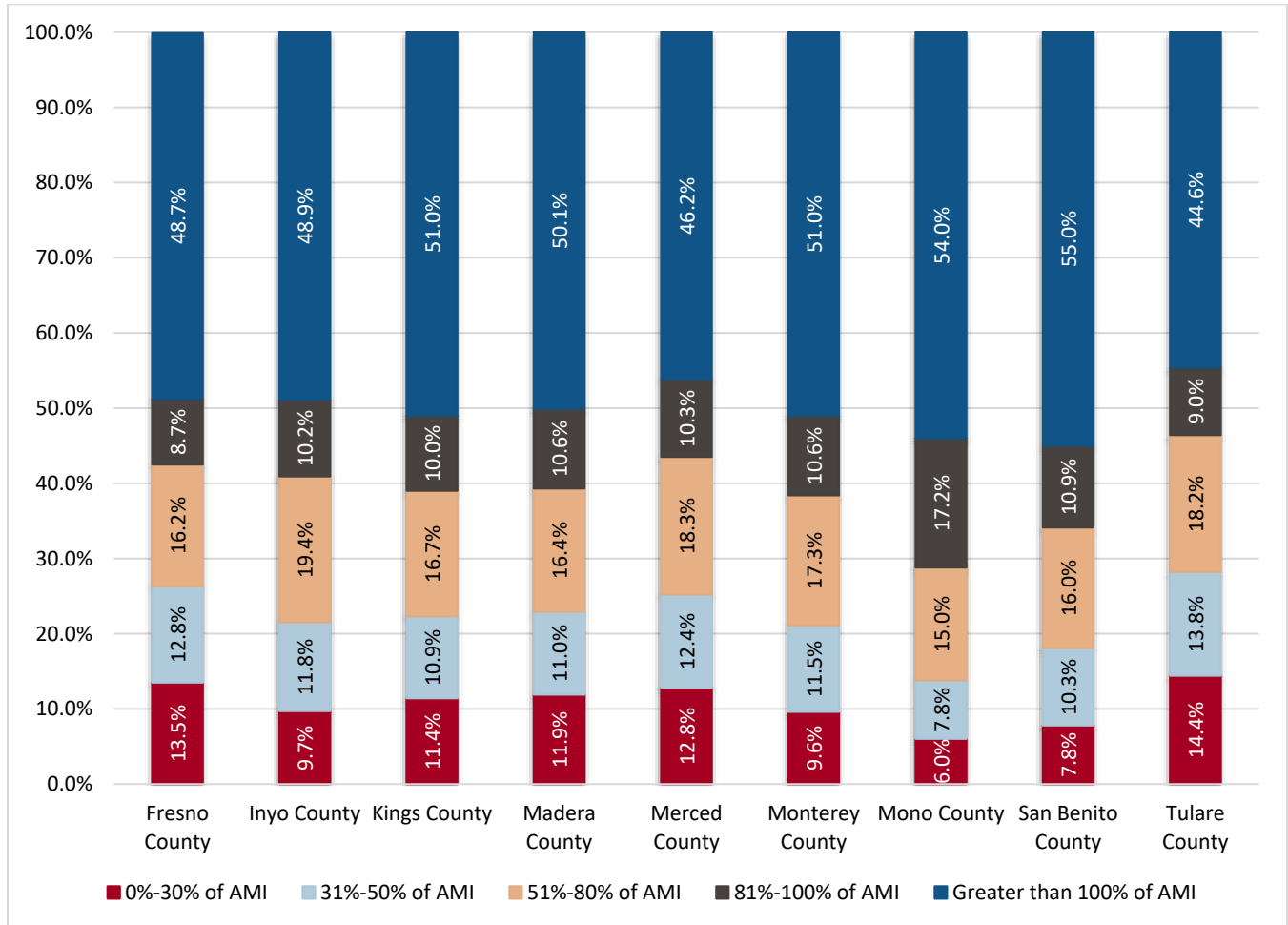
FIGURE 3-7 INCOME PATTERNS IN THE REGION



Source: 2015-2019 ACS

When comparing income groups between San Joaquin Valley counties, patterns in Fresno County closely mirror many of the San Joaquin Valley counties, supporting the patterns shown in **Figure 3-7, Income Groups in the Region**. **Figure 3-8, Regional Median Incomes**, presents the geographic patterns of median income in Fresno County compared to the region.

**FIGURE 3-8 REGIONAL MEDIAN INCOMES**



Source: 2016 – 2020 ACS

Throughout the region, the highest median income is often found in medium-density urban areas, outside of the central core of the cities in the suburban residential developments, as is the pattern in the incorporated cities of Fresno and Clovis in Fresno County, and Visalia and Tulare in Tulare County, as well as unincorporated areas outside of these cities and in the vicinity of the national forest areas in the eastern portions of these counties. Lower-income concentrations are found within older city cores in the larger jurisdictions. However, in contrast to areas in the state with higher-density populations and uses, the San Joaquin Valley counties are not heavily populated and are instead heavily agricultural, and unincorporated areas are where more lower-income households are located. As shown in **Figure 3-8, Regional Median Incomes**, Fresno County reflects income distribution trends found in the region, with between 46.2 percent and 51.0 percent of the households with incomes 100 percent above the County median in Fresno, Inyo, Kings, Madera, and Monterey Counties. Additionally, the proportion of lower-income households hovers around 40.0 percent in these same counties. Lower-income households comprise between 30.0



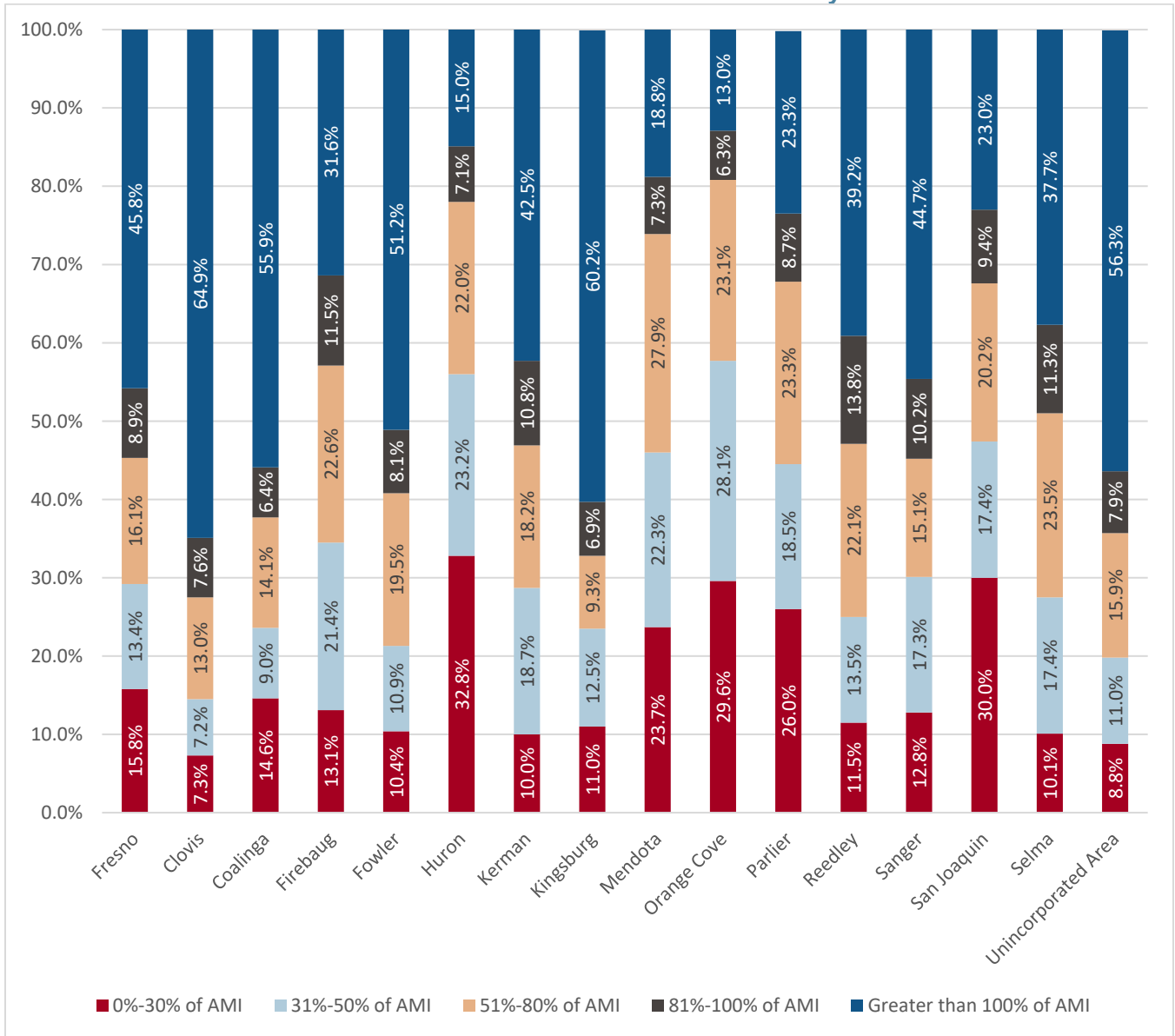
### SECTION 3: REGIONAL ASSESSMENT OF FAIR HOUSING

and 35.0 percent in Mono and San Benito Counties, and higher proportions of lower-income households, between 43.5 and 46.4 percent, are reported in Merced and Tulare Counties, respectively. Conversely, Merced and Tulare Counties had lower proportions of households with incomes above 100 percent of the median, and Mono and San Benito Counties had higher proportions of above median incomes. However, Mono and San Benito Counties are not comparable to the other San Joaquin Valley counties, as Mono County contains a significant portion of Mammoth Mountain recreational area and higher-income retirement residents, and San Benito County more closely reflects adjoining higher-income Santa Clara and Santa Cruz Counties.

Within Fresno County, the City of Clovis, followed by the City of Kingsburg and unincorporated area, has the largest proportion of moderate- and above moderate-income households earning more than 100.0 percent of the Area Median Income (AMI) at 64.9, 60.2, and 56.3 percent, respectively (**Figure 3-9, Income Groups within Fresno County Jurisdictions**). Conversely, the cities of Huron, San Joaquin, Orange Cove, and Parlier have the highest percentage of households with extremely low incomes below 30.0 percent of the AMI, at 32.8, 30.0, 29.6, and 26.0 percent respectively. Overall, the City of Orange Cove has the highest percentage of lower-income households, constituting 80.8 percent of the total households, followed by the City of Huron at 78.0 percent of the total households, the City of Mendota at 73.9 percent of total households, and the cities of Parlier and San Joaquin at 67.8 and 67.6 percent. The distribution of income groups within Fresno County may be representative of the availability of affordable housing, the historic development patterns, and the employment opportunities in the San Joaquin Valley.

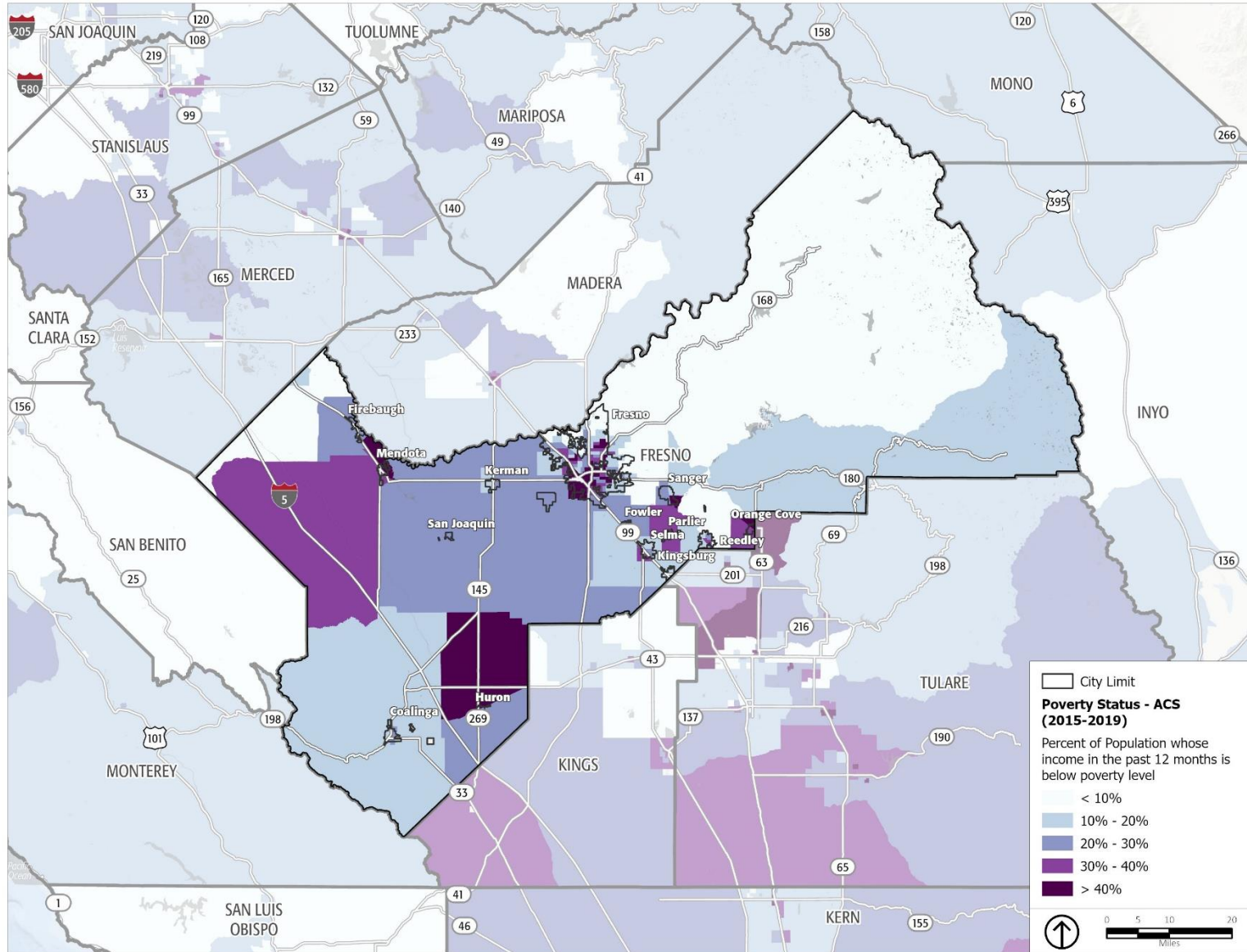
As shown in **Figure 3-9, Income Groups within Fresno County Jurisdictions**, over half of the households in the cities of Huron and Orange Cove have incomes falling into the extremely low- and very low-income categories. In the cities of Mendota and San Joaquin, just over 46.0 percent of total median household incomes fall in the extremely low- and very low-income categories, corresponding with high rates of poverty shown in **Figure 3-10, Regional Poverty Rates**. While all jurisdictions in Fresno County, with the exception of the City of Clovis and the unincorporated county, have areas in which at least 10.0 percent of the population falls below the poverty line, the cities of Kerman, Selma, and Fowler have the lowest representation of population with incomes below 30.0 percent AMI, at 10.0, 10.1, and 10.4 percent, respectively.

FIGURE 3-9 INCOME GROUPS WITHIN Fresno County Jurisdictions



Source: San Joaquin Valley (SVJ) Regional Early Action Project (REAP) 2022

FIGURE 3-10 REGIONAL POVERTY RATES



Source: 2015-2019 ACS



## ***Racial and Ethnic Characteristics***

The Othering and Belonging Institute developed the Divergence Index tool that compares the relative proportions of racial groups (or any other groups) at smaller and larger geographies, looking for the degree of “divergence” between the two geographies, such as between a census tract and a county.<sup>2</sup> The lowest possible value of the Divergence Index is 0, when the demographics of a smaller geography does not differ, or diverge, from that of the larger geography, suggesting minimal segregation, whereas higher values suggest higher divergence, and hence higher segregation. For example, if the population within an overall jurisdiction of two census tracts is predominantly Hispanic at 91.0 percent, and one census tract is 95.5 percent Hispanic, the Divergence Index in that tract would be low, as the tract does not differ significantly from the larger geographical unit. However, if the other census tract is primarily Hispanic at 74.0 percent and has higher proportions of other racial and ethnic groups, the Divergence Index would be higher, as that tract differs from overall geographical demographic patterns, and the Non-Hispanic residents would be the populations that are considered segregated. The mapping designation in that tract would be Low-Medium Segregation. In this case, a predominantly Hispanic community is not considered “segregated” as the majority of the population is homogeneous – it is the presence of other races/ethnicities within a smaller geographic unit where segregation, which may include White Non-Hispanic, Asian, Other, or any combination of racial/ethnic affiliation, that are actually the “segregated” populations within an area that is overall representative of Hispanic populations. The Divergence Index reveals patterns between racial and ethnic concentrations that may indicate segregation, such as “between-place” (or inter-municipal or regional segregation) and “within-place” (or intra-municipal) segregation. In other words, the Divergence Index measures the degree of segregation between neighborhoods within a city compared to the degree that it exists between cities within a metropolitan region.

While the Divergence Index indicates the separation of groups across space, it cannot, by itself, indicate if a place is truly “integrated.” A place could have a low level of segregation and yet not reflect what we would intuitively describe as “integrated.” This is because some places with little racial segregation may be racially homogeneous, with little underlying diversity that would result in segregation. Some communities and regions may appear to have relatively little racial residential segregation, but that may be a result of low diversity. The determination of high or low-medium segregation designations at the larger county level, for example, is not predicated solely on a predominance of one race or another. The distribution of population within racial/ethnic groups at the overall county level is established as a baseline. The Segregation/Integration designation is then determined on how each of the racial/ethnic populations are distributed proportionally at the jurisdictional level, compared to the percentage of the population in each racial/ethnic group at the baseline county level.

As shown in **Figure 3-11, Segregation and Integration, Regional Divergence, 2020**, there is a mix of High and Low-Medium Segregation designations among the counties surrounding Fresno County. There are no counties identified as Racially Integrated. Fresno County has been identified as highly segregated, with a baseline distribution of 54.0 percent Hispanic, 24.0 percent White Non-Hispanic, 11.0 percent Asian, and 8.0 percent Other. Although the representation of the racial and ethnic populations in the City of Fresno closely correspond to the county baseline, eight of the jurisdictions in the county have Hispanic populations over 80.0 percent, thereby

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<sup>2</sup> Othering and Belonging Institute, 2022, “Technical Appendix” in *The Roots of Structural Racism Project*, accessed October 5, 2022. <https://belonging.berkeley.edu/technical-appendix>.

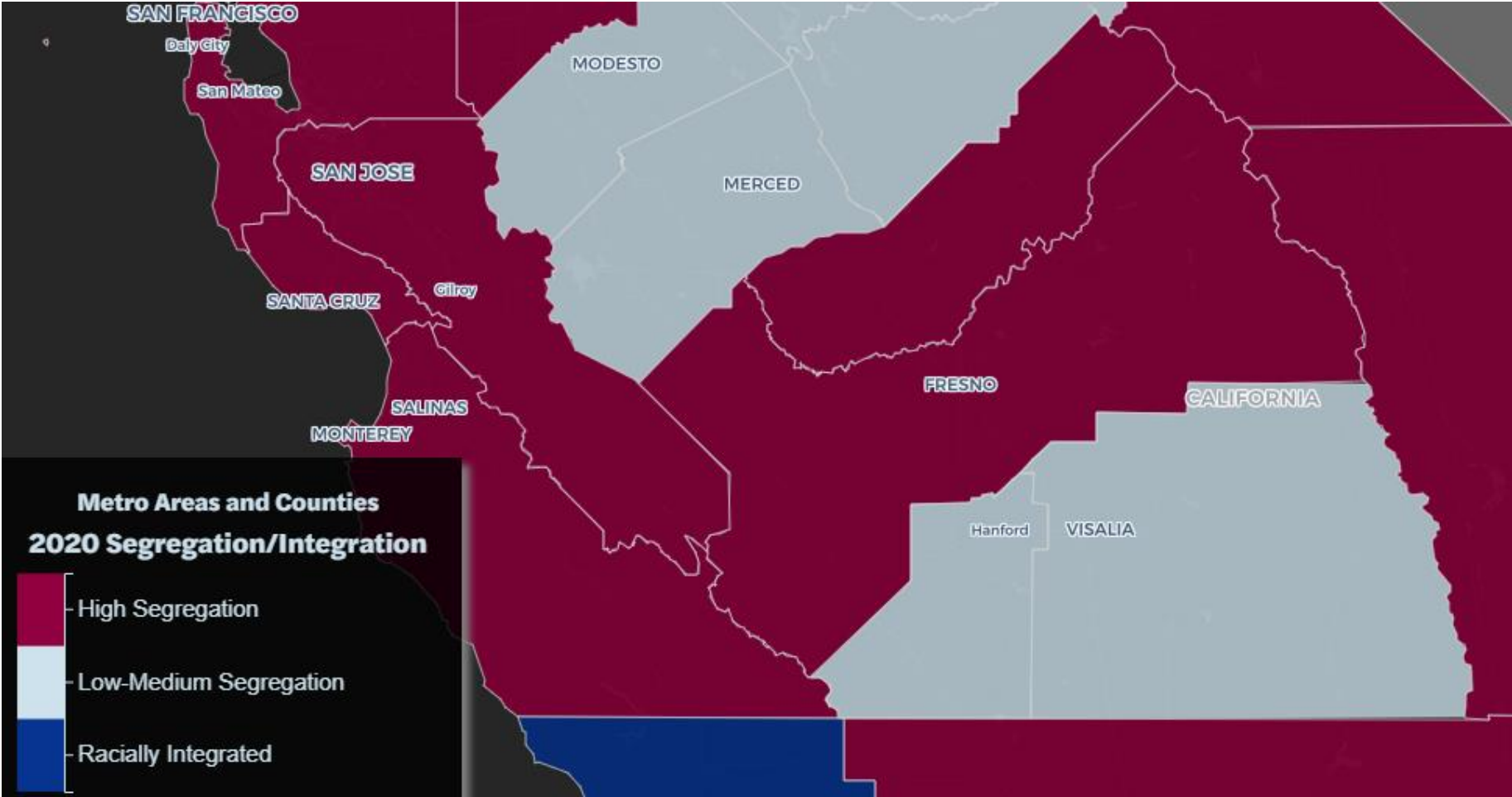
### SECTION 3: REGIONAL ASSESSMENT OF FAIR HOUSING

“diverging” from the county baseline and indicating a segregated population of color. In contrast, the City of Clovis has a White population that is almost double that of the overall county, and conversely the proportion of Hispanic residents is 31.0 percent compared to 54.0 percent per the county baseline, again indicating a divergence from the countywide racial and ethnic population distribution. The three remaining jurisdictions have proportional representations of racial and ethnic populations that generally diverge less than approximately 20 percentage points from the baseline and are designated low-medium segregation. However, the High Segregation allocation results from the prevalence of jurisdictions within the county that differ so significantly from the baseline.

Similar patterns of jurisdictions diverging from the county level racial and ethnic baseline occur in Monterey, Madera, Inyo, and Mono Counties, with associated High Segregation designations. Madera and Monterey Counties experience the divergence primarily within the Hispanic and Other populations. In Madera County, the racial and ethnic distribution is 60.0 percent Hispanic, 31.0 percent White Non-Hispanic, and 9.0 percent Other. However, Madera has a distribution that diverges from the baseline with 80.0 percent Hispanic, 13.0 percent White Non-Hispanic, and 8.0 percent Other, and Chowchilla has a lower proportion of Hispanic residents, a comparable White Non-Hispanic representation, yet a higher proportion of Black and Other residents at 15.0 percent. Monterey County’s High Segregation designation is attributed to the extreme divergence of racial and ethnic representation in the coastal cities from the baseline of 60.0 percent Hispanic, 27.0 percent White Non-Hispanic, and 12.0 percent Other, with White Non-Hispanic populations more than double the county baseline and Asian and Other proportions almost double the county baseline. In contrast, the inland jurisdictions along Interstate (I-) 5 in the rural agricultural portions of the county have high proportions of Hispanic communities between 20 and 33 percentage points from the baseline, with corresponding low White Non-Hispanic and Other populations.

In contrast, in Mono and Inyo Counties, the High Segregation designation is based on the predominance of a countywide White population at 66.0 and 58.0 percent, respectively, and although there is a comparable racial and ethnic composition in the single incorporated jurisdiction in each, the remainder of each of the counties’ census designated places (CDPs) have proportional representations of racial and ethnic groups that are divergent from the county baseline, and therefore have been identified as a High Segregation statistical area. The remaining adjacent Merced, Tulare, and Kings Counties are considered Low-Medium Segregation, with the proportions of Hispanic, White Non-Hispanic, Asian, and Other communities of color more closely correlating with the baseline distributions of racial/ethnic populations. San Benito County is included in the San Jose/Sunnyvale, Santa Clara Metropolitan Statistical Area (MSA) and therefore not comparable in this analysis.

FIGURE 3-11 SEGREGATION AND INTEGRATION, REGIONAL DIVERGENCE, 2020



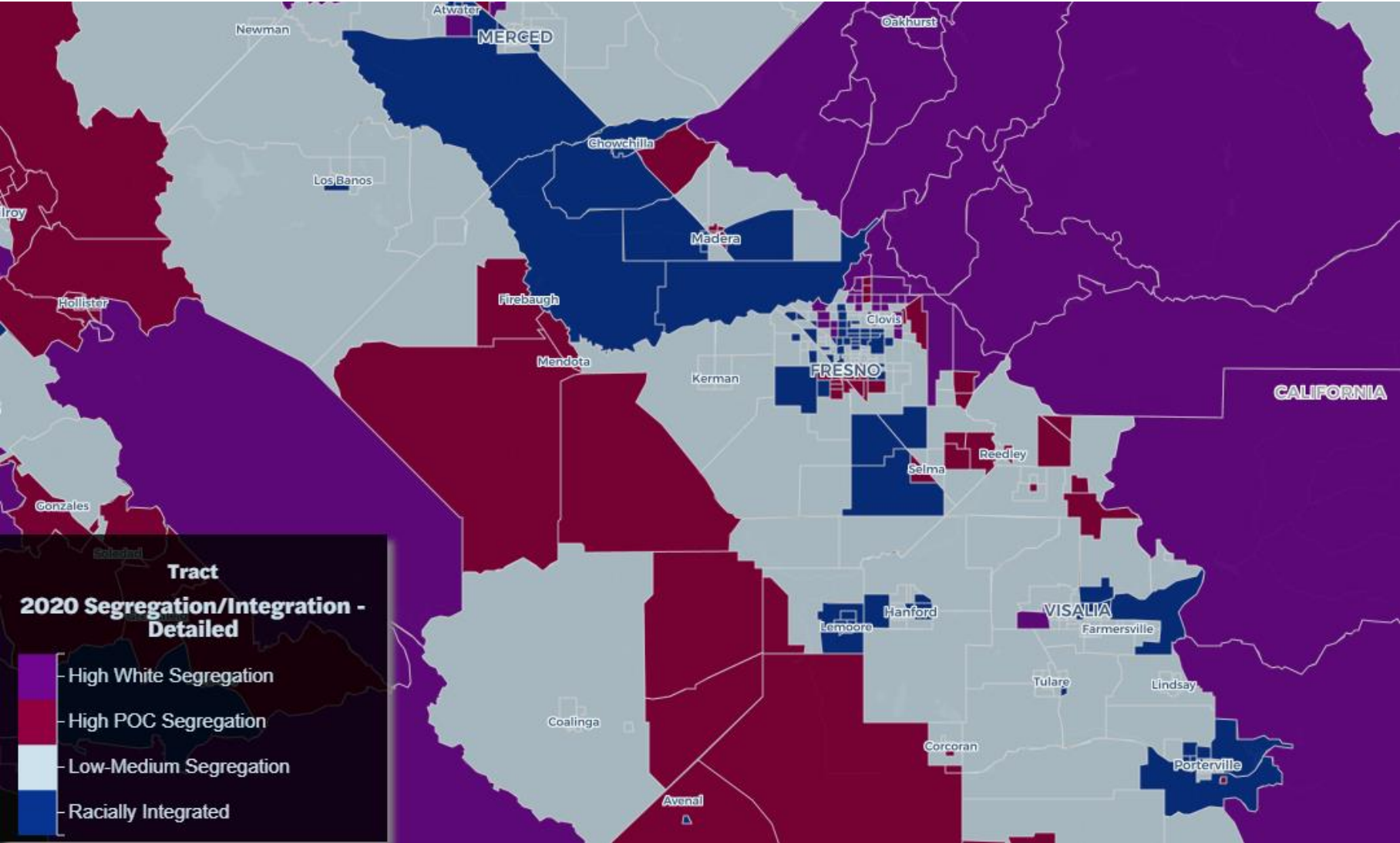
Source: *Othering and Belonging Institute, 2020*

### SECTION 3: REGIONAL ASSESSMENT OF FAIR HOUSING

As shown in **Figure 3-12, Racial and Ethnic Divergence, Fresno County Region**, the detailed Segregation and Integration Index is an alternative measurement of segregation and integration from a more qualitative perspective, although the categories are based on quantitative proportions, classified as high white segregation (more than 51 percent White population); high People of Color (POC) segregation (above 75 percent total Non-White populations); low-medium segregation (between 50 and 74 percent predominant population and 25 to 50 percent White populations); and racially integrated (below 50 percent representation of all racial and ethnic groups). Within Fresno County, there are pockets of high POC segregation correlating to many of the eastern jurisdictions, within and around the cities of Fresno and Clovis, and large areas of high POC segregation in the western portion of the county, correlating to a predominance of Hispanic populations. Conversely, there are no areas of high White segregation west of SR 99 in Fresno County, although the eastern portion of Fresno County, as well as Mono and Inyo Counties, are identified as high White segregation areas, correlating to the predominantly White, non-Hispanic population. In contrast, the high White segregation designation is also found in San Benito and Monterey Counties, which were, at the MSA level, considered highly segregated, yet this designation is due to the physical concentrations of predominantly White, non-Hispanic populations along the coast in Monterey County and more sizeable non-Hispanic White representation in San Benito County.

At the census tract level, many of the jurisdictions in Fresno County designated as High Segregation at the higher level include census tracts (comprising the entire city or a majority of the census tracts in the city) designated as High POC Segregation, including Mendota, Selma, Reedley, Sanger, Parlier, Orange Cove, and Huron, as well as census tracts in the western unincorporated county, as they are predominantly Hispanic, which is divergent from the county baseline (although internally the level of segregation is low). These designations are often reflective of the intra-city relationships between racial and ethnic groups and high representations of Hispanic populations. In the City of Clovis, as well as unincorporated county islands in the City of Fresno, and eastern census tract adjacent to the national forest areas, also designated as High Segregation at a broader level, the majority of census tracts are identified as High White Segregation. Those census tracts that are identified as High POC in the City of Clovis reflect a high concentration of Asian residents in combination with an average of 20.0 percent Hispanic and Other at approximately 6.0 percent. A large portion of the census tracts within the cities of Fresno, Kerman, Kingsburg, Clovis, and Coalinga, as well as unincorporated suburbs of the City of Fresno, are designated as areas of Low-Medium segregation, which relate to intra-city distribution of racial and ethnic populations within the total city composition. While there are no jurisdictions in Fresno County designated as racially integrated in their entirety, Racially Integrated designations exist at the census tract level in the cities of Fresno and Clovis and south along SR 99 that correspond to Diversity Index percentiles not reflected at the jurisdictional-level profile.

FIGURE 3-12 RACIAL AND ETHNIC DIVERGENCE, FRESNO COUNTY REGION



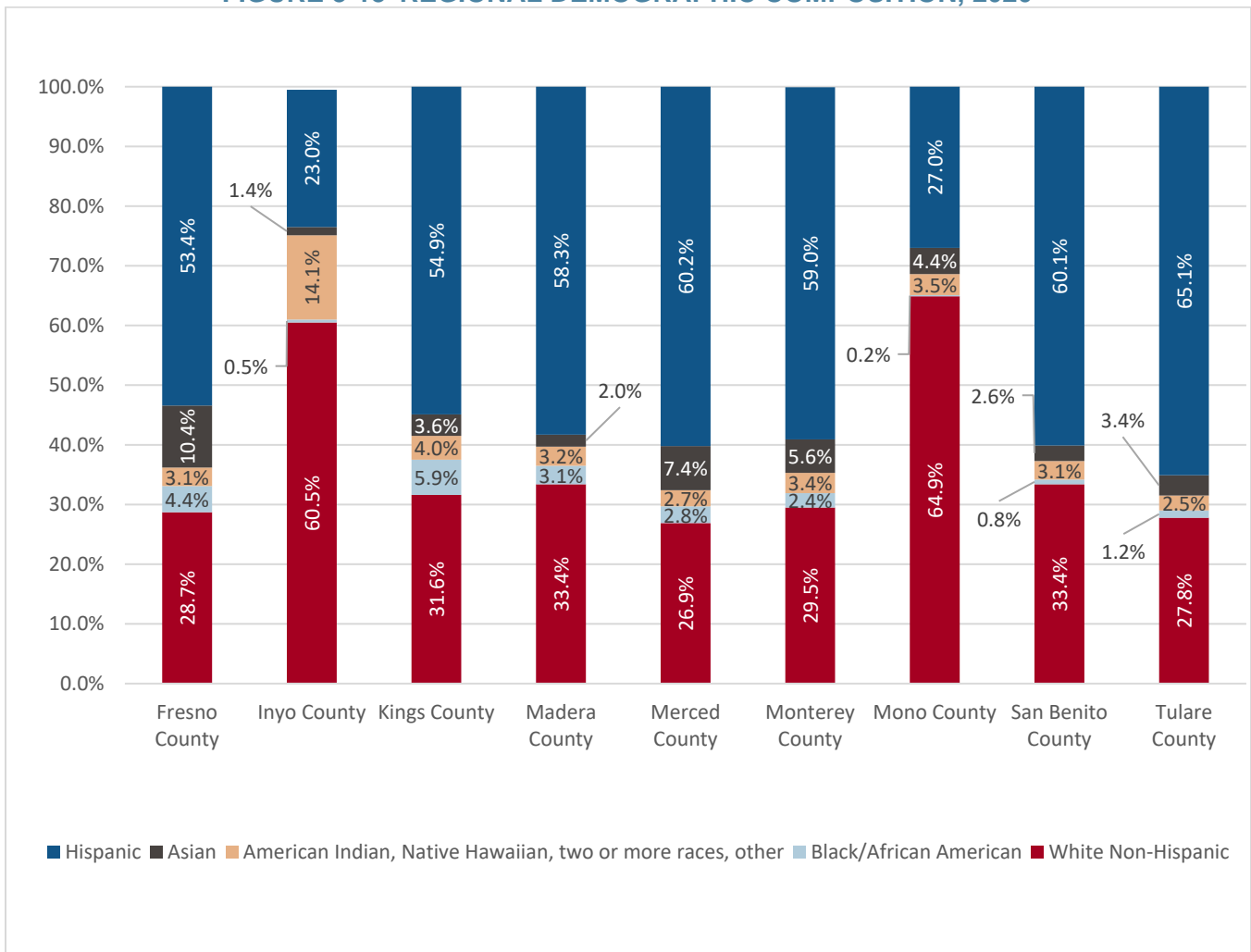
Source: Othring and Belonging Institute, 2020



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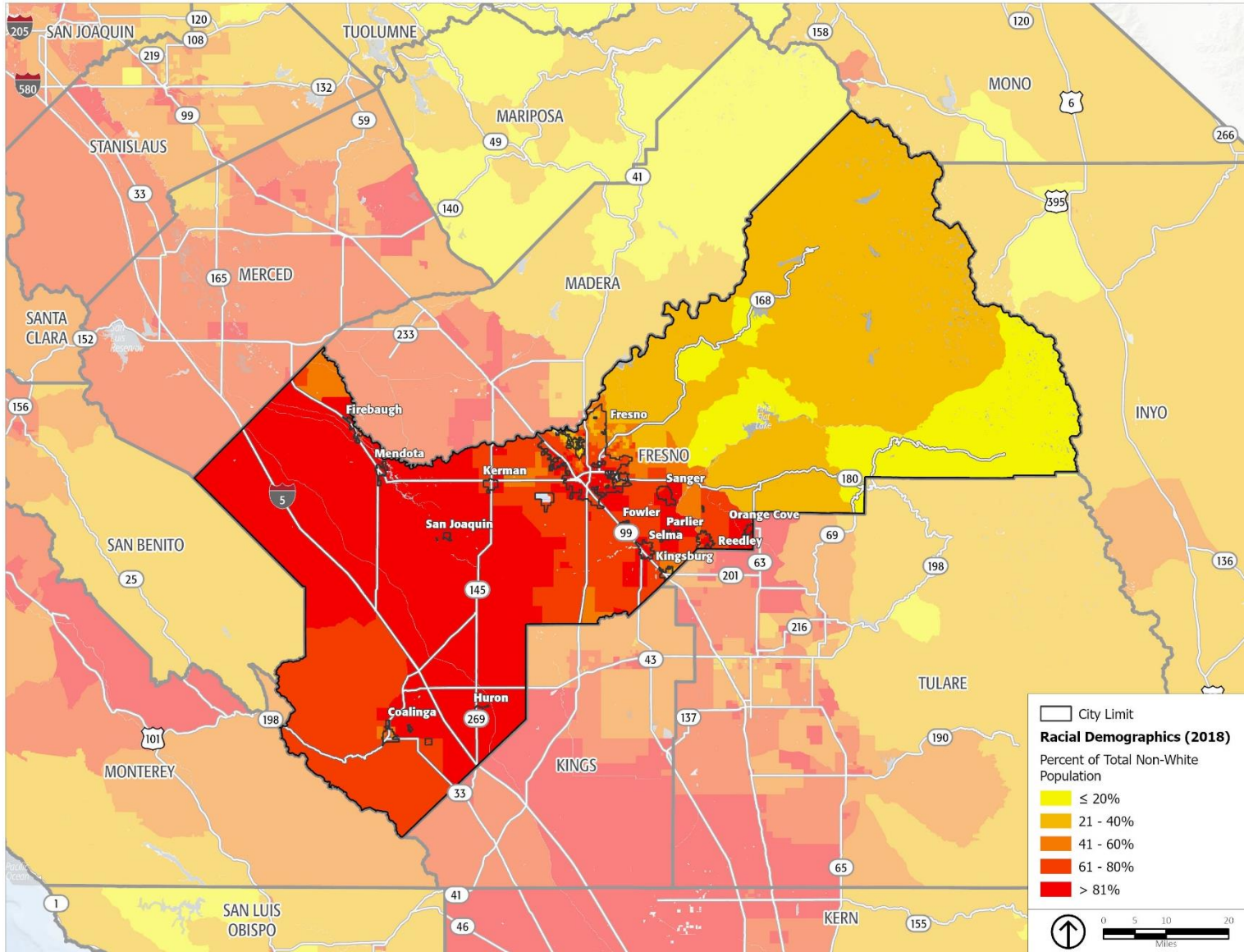
In Fresno County, as in much of the surrounding San Joaquin Valley region following SR 99 and to the west, the population is primarily Non-White, (**Figure 3-13, Regional Demographic Composition, 2020**, and **Figure 3-14, Regional Racial Demographics**) with the predominant population identifying as Hispanic, with the exception of portions of Clovis and pockets of unincorporated areas. The northern portion of the San Joaquin Valley region has similar racial and ethnic patterns, with most of Merced, Madera, and Tulare Counties being 61.0 to 81.0 percent Non-White with predominantly Hispanic populations, with concentrations of Non-White populations above 81.0 percent in the core areas of jurisdictions. San Benito County has a slightly less diverse population, with 41.0 to 60.0 percent of the population identifying as Non-White and a sizeable White population. In the eastern Inyo and San Joaquin Counties, the population is predominantly White Non-Hispanic, with communities of color comprising less than 40.0 percent of the population. These racial and ethnic trends in the flatland areas of the San Joaquin Valley reflect patterns of the historical agricultural economy and associated lower-income distribution with higher rates of poverty.

**FIGURE 3-13 REGIONAL DEMOGRAPHIC COMPOSITION, 2020**



Source: 2016-2020 ACS

FIGURE 3-14 REGIONAL RACIAL DEMOGRAPHICS



Source: Esri, 2018

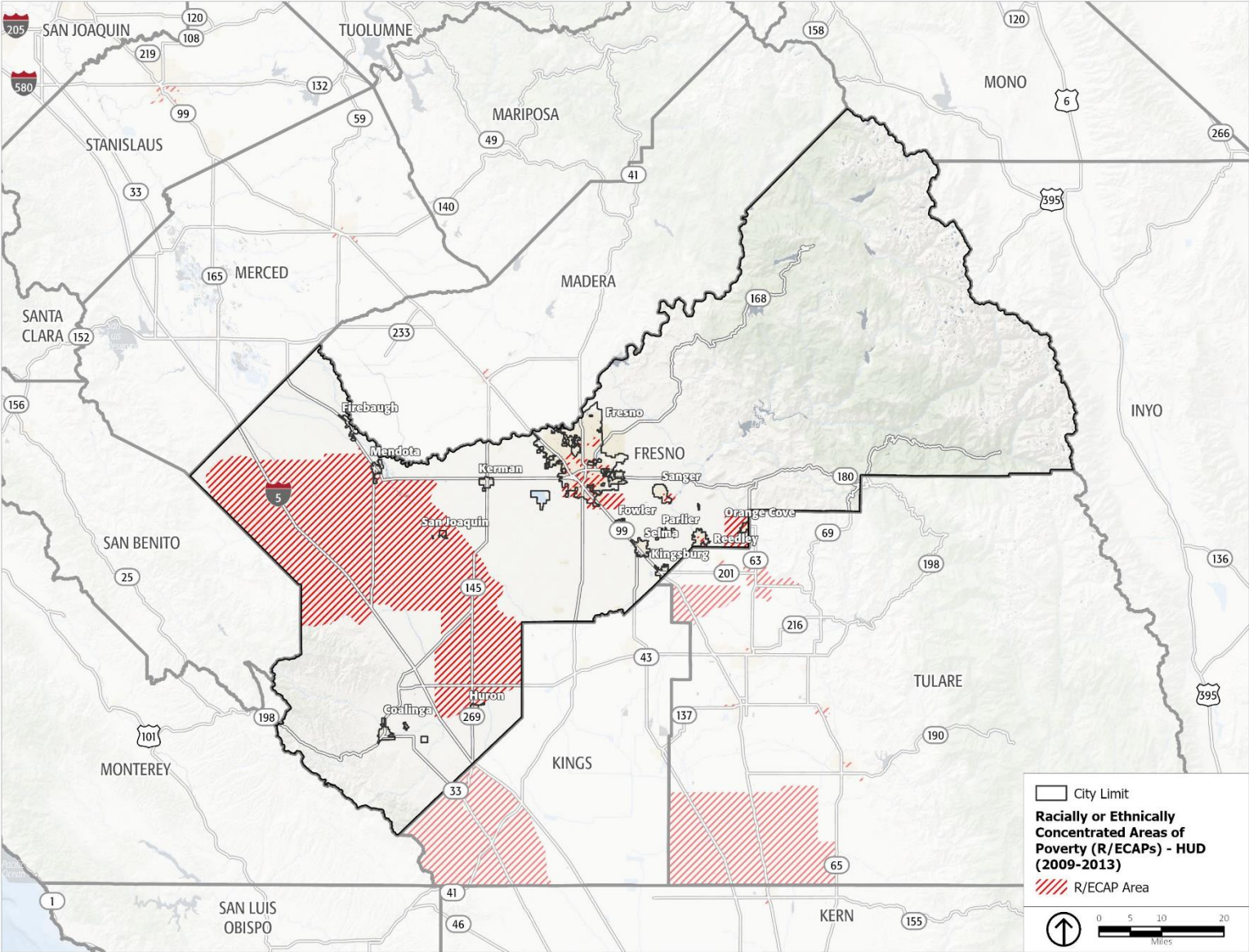


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Concentrations of minority populations, or concentrations of affluence, may indicate a fair housing issue despite relative integration compared to the region. A racially and ethnically concentrated area of poverty (R/ECAP) is defined by the United States Department of Housing and Urban Development (HUD) as an area in which 50.0 percent or more of the population identifies as non-White and 40.0 percent or more of households are earning an income below the federal poverty line. HCD has identified racially concentrated areas of affluence (RCAAs) in California as census tracts in which the total population that identifies as White is 1.25 times higher than the average percentage of the total White population in the local COG (60.3 percent in FCOG) and a median income that is 1.5 times higher. There are 36 tracts identified as R/ECAPs in the City of Fresno; one within the limits of the City of Sanger; two within the limits of the City of Orange Cove; one within the limits of the City of Reedley; one within the limits of both the Cities of Mendota and San Joaquin, including the surrounding unincorporated areas; and one within the limits of the City of Huron, all of which are discussed in more detail in their respective jurisdictional analysis. There are several other R/ECAPs in the southern San Joaquin Valley region in Tulare County, and in San Benito County, while there are several in the cities of Merced and Madera (see **Figure 3-15, Regional R/ECAPs**). However, the incidence of R/ECAPS is far greater in the larger, more urbanized jurisdiction of Fresno. In contrast, there are several RCAAs in Fresno County (see **Figure 3-16, Regional RCAAs**), in the cities of Clovis and Fresno, including unincorporated islands and unincorporated areas east of Clovis and Fresno. RCAAs are also evident throughout the southern and eastern portions of the region, including portions of the cities of Visalia, Tulare, and Hanford and adjacent unincorporated area, and the Sequoia National Forest communities.

At the local level, the AFFH diversity data map provides a current reflection of local integration. As shown in **Figure 3-17, Diversity Index for Fresno County**, the Diversity Index percentile closely corresponds to the racial demographics data presented in **Figure 3-18, Fresno County Jurisdiction Racial Demographics**. Areas with the lowest diversity indices are found in Clovis and the unincorporated island in northern Fresno, as well as the eastern communities of Squaw Valley and Aubrey. The majority of cities fall within the 70.0 to 85.0 percent diversity percentile, with the highest diversity scores above the 85th percentile found in and surrounding the City of Fresno, in the City of Fowler, west and south in the unincorporated county towards the cities of Caruthers, Huron, and Coalinga, and also in portions of the City of Mendota and the City of Kerman. In some jurisdictions, the percentage of the population that identifies as other Non-White (including Black/African American, Native American, Asian, and Multiple Race) is so low, as shown in the Figure 2-1, Race and Ethnicity (2020), in the Needs Assessment, that diversity indices may not accurately represent their distribution.

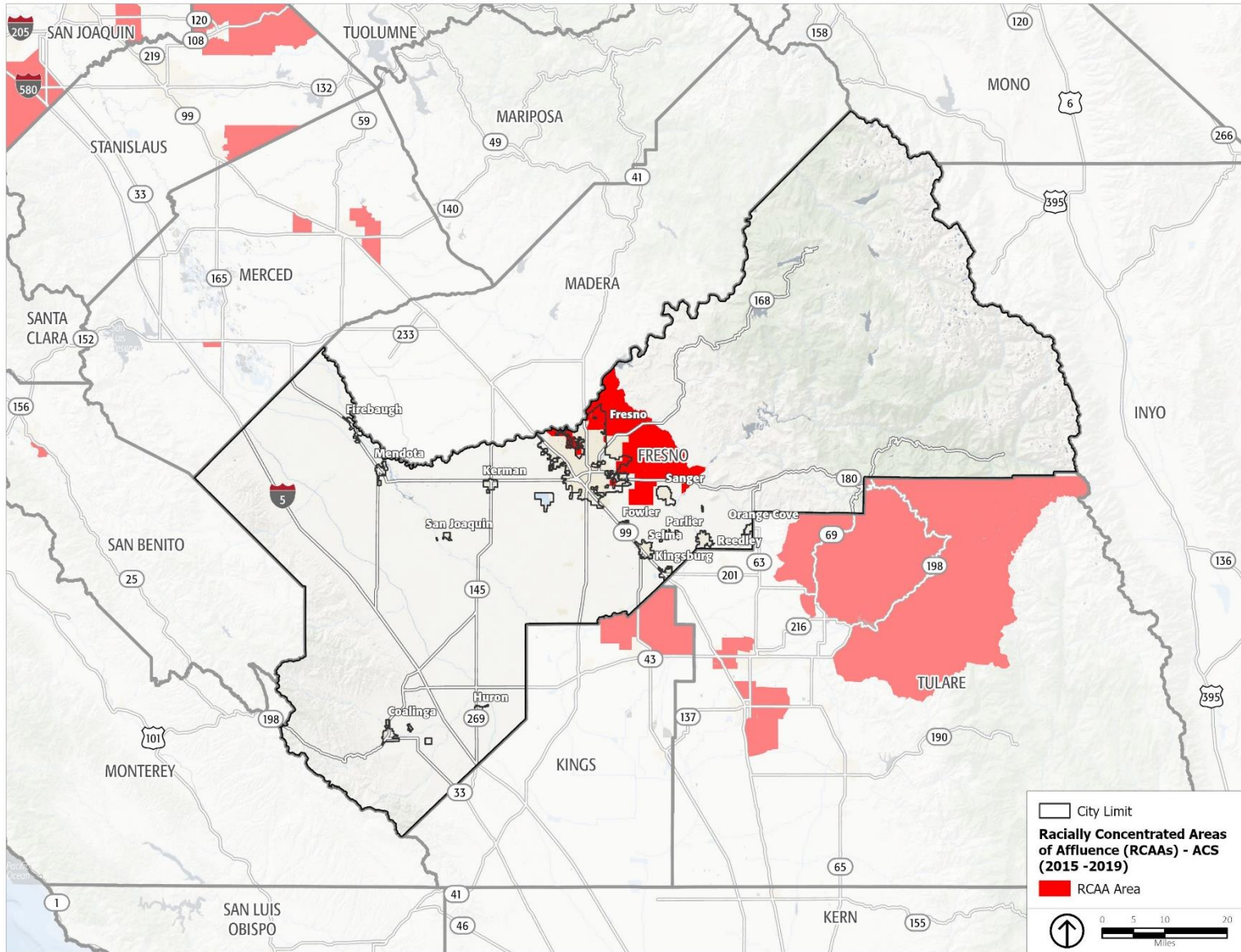
FIGURE 3-15 REGIONAL R/ECAPS



Source: HUD, 2013

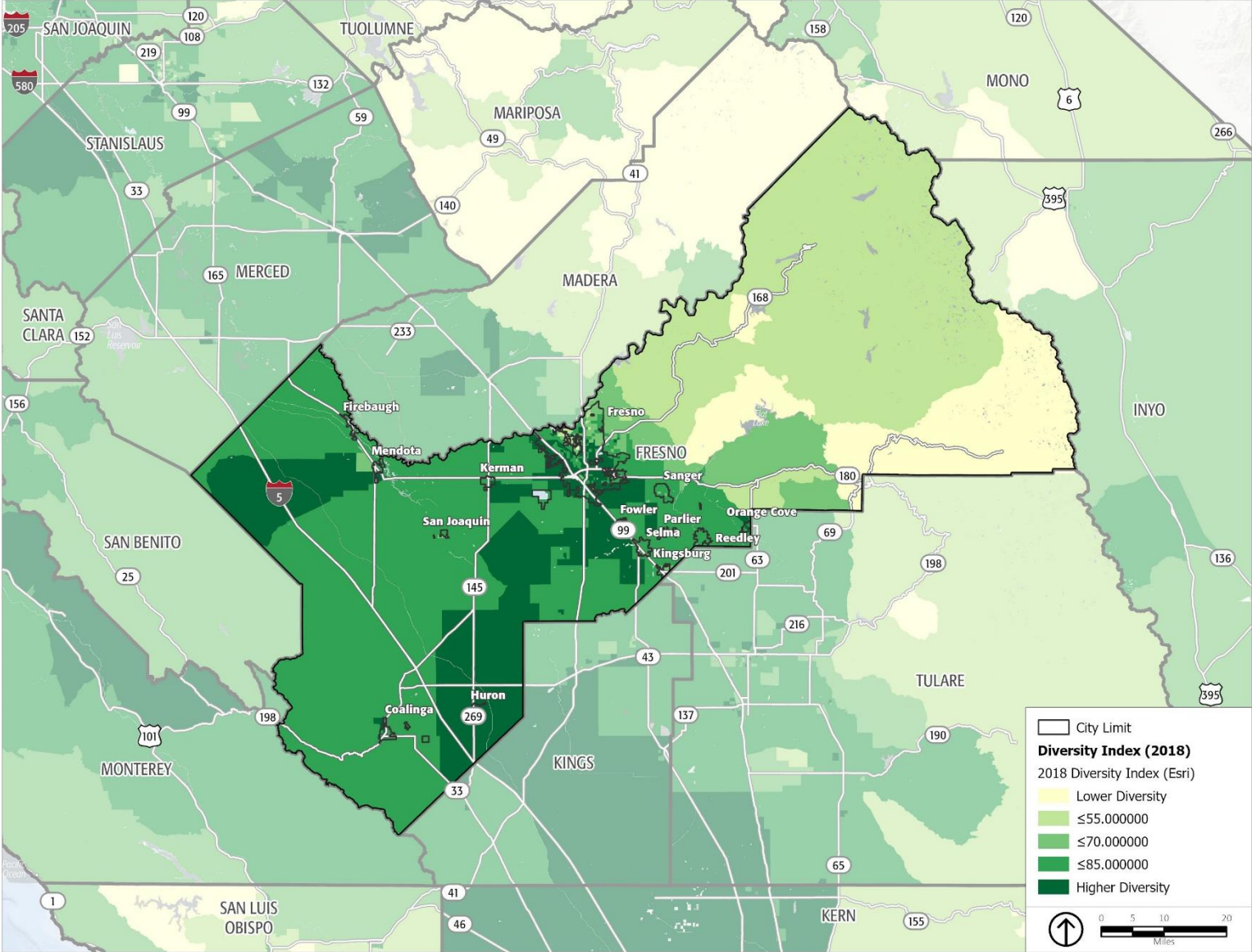


FIGURE 3-16 REGIONAL RCAAS



Source: 2015-2019 ACS, HCD 2022

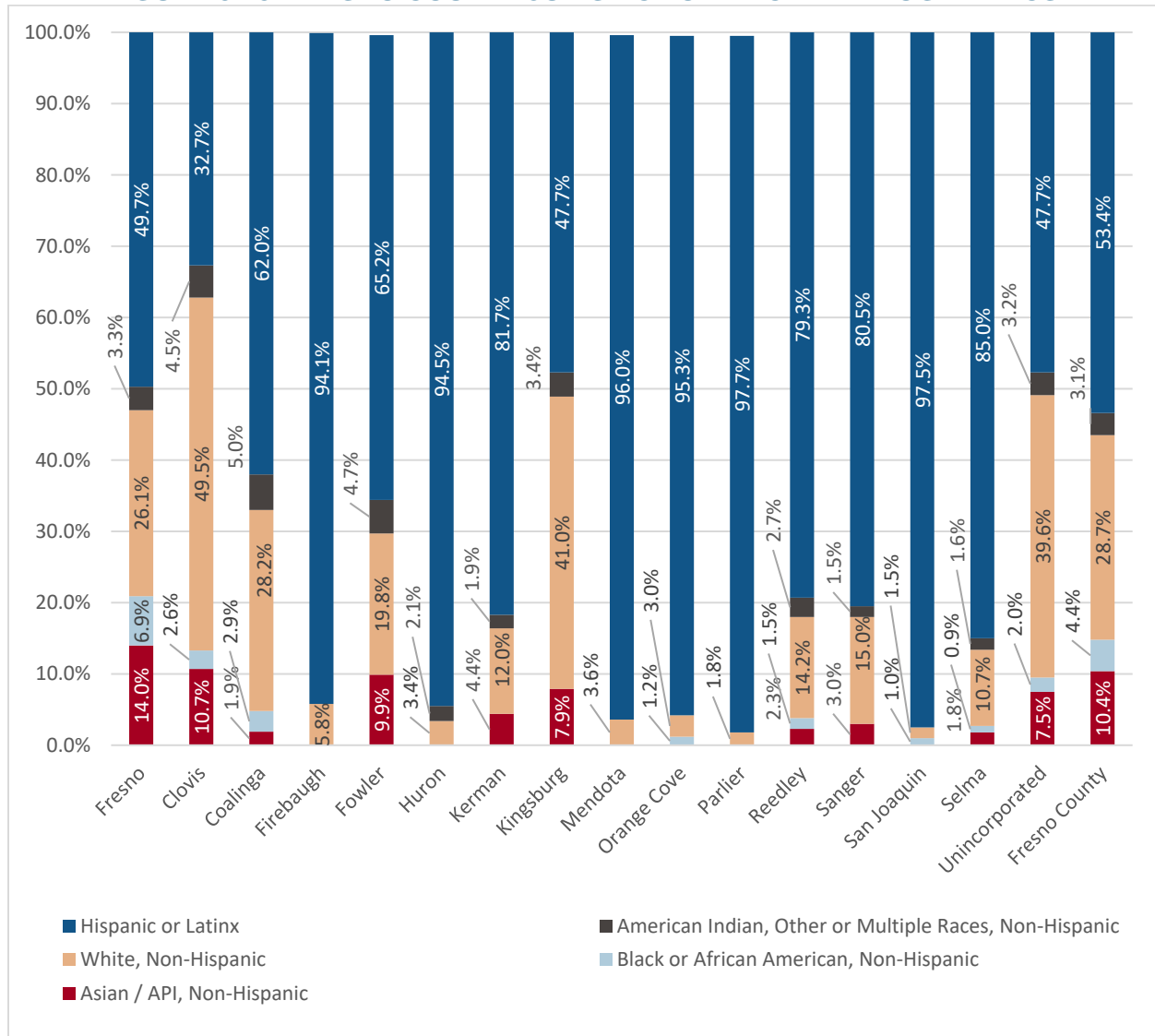
FIGURE 3-17 DIVERSITY INDEX WITHIN FRESNO COUNTY



Source: Esri, 2018

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FIGURE 3-18 FRESNO COUNTY JURISDICTION RACIAL DEMOGRAPHICS



Source: 2016-2020 ACS

### Familial Status

Patterns of familial status present a potential indicator of fair housing issues, as it relates to availability of appropriately sized or priced housing when certain family types are concentrated. As a protected characteristic, concentrations of family types may also occur as a result of discrimination by housing providers, such as against families with children or unmarried partners. Furthermore, single-parent, female-headed households are considered to have a greater risk of experiencing poverty than single-parent, male-headed households due to factors including the gender wage gap and difficulty in securing higher-wage jobs.

In 2021, the HUD Office of Fair Housing and Equal Opportunity (FHEO) reported the number of housing discrimination cases filed with HUD since January 2013. Of the 140 cases in Fresno County, approximately 9.3 percent (13 cases) alleged familial status discrimination (**Table 3-1, Regional Familial Status Discrimination, 2013-2021**). According to the FHEO, six cases were filed in Fresno County in 2020, none



of which were familial status related. While it is important to note that some cases may go unreported, 13 cases in 8 years reflects fairly low rates of familial status discrimination in Fresno County. Further, the incidence of discrimination against familial status in Fresno County is relatively low compared to the region, with three counties having lower rates, and two counties having rates approaching 30.0 percent.

**Table 3-1 Regional Familial Status Discrimination, 2013-2021**

County	Total Cases*	Cases Alleging Familial Status Discrimination	
		Number	Percentage of Total Cases
Fresno County	140	13	9.3%
Inyo County	N/A	N/A	N/A
Kings County	14	4	28.6%
Madera County	11	0	0%
Merced County	27	3	11.1%
Mono County	2	0	0%
Monterey County	98	18	18.4%
San Benito County	10	3	30.0%
Tulare County	47	4	8.5%

\*Cases that were withdrawn by the complainant without resolution, resulted in a no-cause determination, or were not pursued as a result of failure of the complainant to respond to follow-up by HUD are not included in this total.

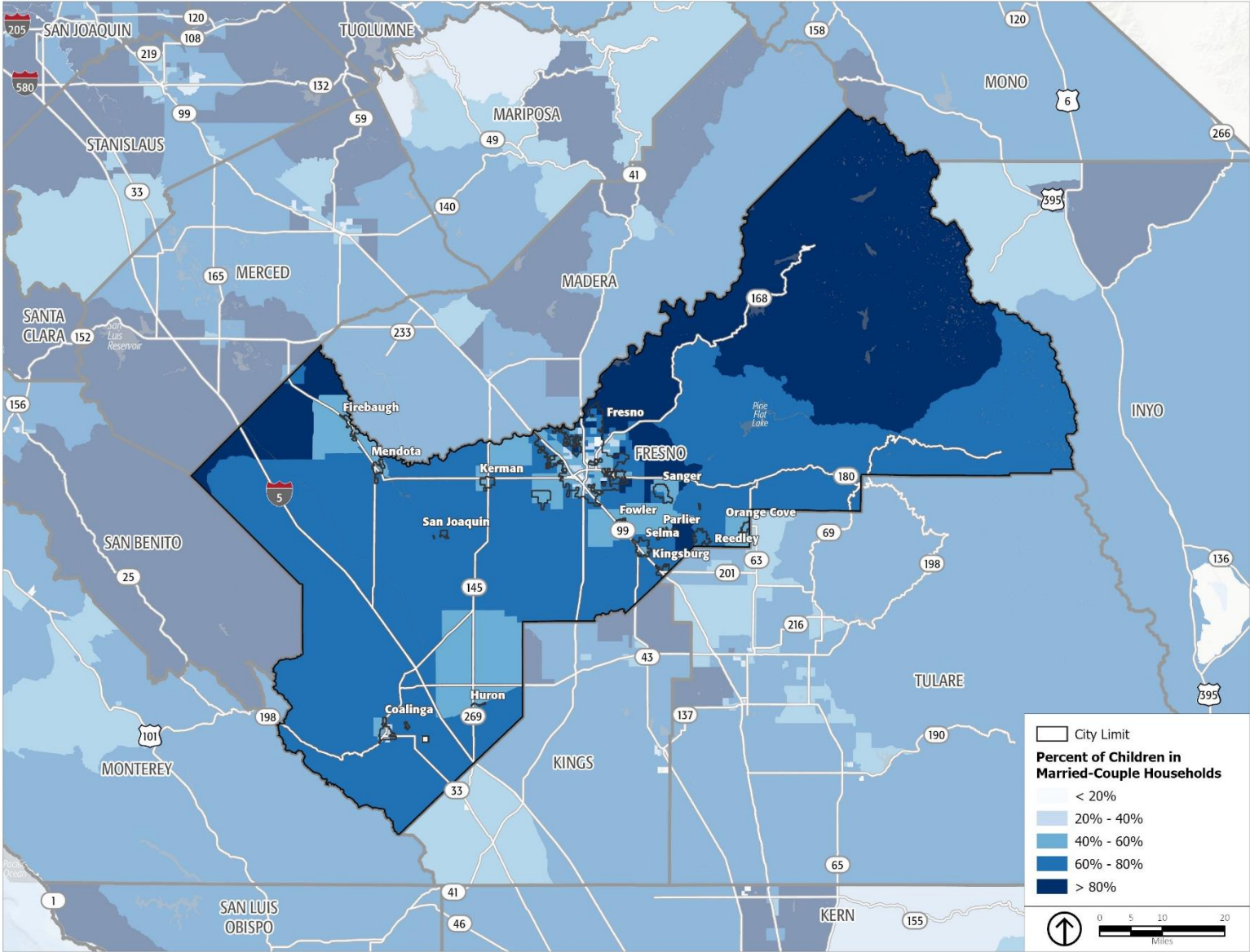
Source: HUD, 2021

While discrimination against familial status does not appear to pose a fair housing issue in Fresno County, particularly compared to the region, there are still notable patterns of distribution for varying family types. As seen in **Figure 3-19, Percentage of Children in Married-Couple Households in the Region**, most of Fresno County has moderate to high rates of this family type, comparable to surrounding San Joaquin Valley jurisdictions. In the San Joaquin Valley, in areas where residences are typically more dispersed and uses are more agricultural or limited by topography, there is a higher incidence of families with children than is found in the central and southern neighborhoods of the City of Fresno, as well as portions of the cities of Coalinga, Kerman, Mendota, Firebaugh, Fowler, Parlier, Orange Cove, and Sanger, inclusive of adjacent unincorporated areas. This trend is also present in the more urbanized areas of Tulare, Merced, and Madera Counties. In contrast, Inyo, Mono, the eastern portion of Monterey, and San Benito Counties, which have relatively few pockets of urbanization, have the highest rates of married-family households with children. The highest rates of female-headed households with children in Fresno County, between 20.0 and 40.0 percent, are in, or immediately adjacent to, incorporated cities, likely where there is better access to schools, transit, services, and jobs, as well as a greater range of housing types to meet a variety of needs (**Figure 3-20, Percentage of Children in Female-Headed Households in the Region**). This pattern is seen throughout the San Joaquin Valley region, with greater concentrations of female-headed households in and near cities, as well as in the eastern areas of Fresno and Tulare Counties, and throughout Mono and Inyo Counties. Higher rates of married-couple households are found further from urban centers, west of SR 99, in higher-income communities, and also in the eastern areas of Fresno, Madera, Merced, and Tulare Counties, and throughout Mono and Inyo Counties.

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Within Fresno County, the highest concentration of female-headed households, 60.0 to 80.0 percent of total households, is evident in two census tracts in the City of Fresno. There are several tracts in Fresno, predominantly along SR 99 and SR 41, with proportions of female-headed households comprising 40.0 to 60.0 percent of the total households, as well as two tracts in the City of Clovis. In line with this, Fresno has tracts with lower concentrations of married-couple households with children, which is the dominant family type in the remainder of the county and nearby areas of the unincorporated county. In other jurisdictions in the county, there is a more balanced representation of a variety of family types, though married couples are still the primary family type throughout Fresno County and the region.

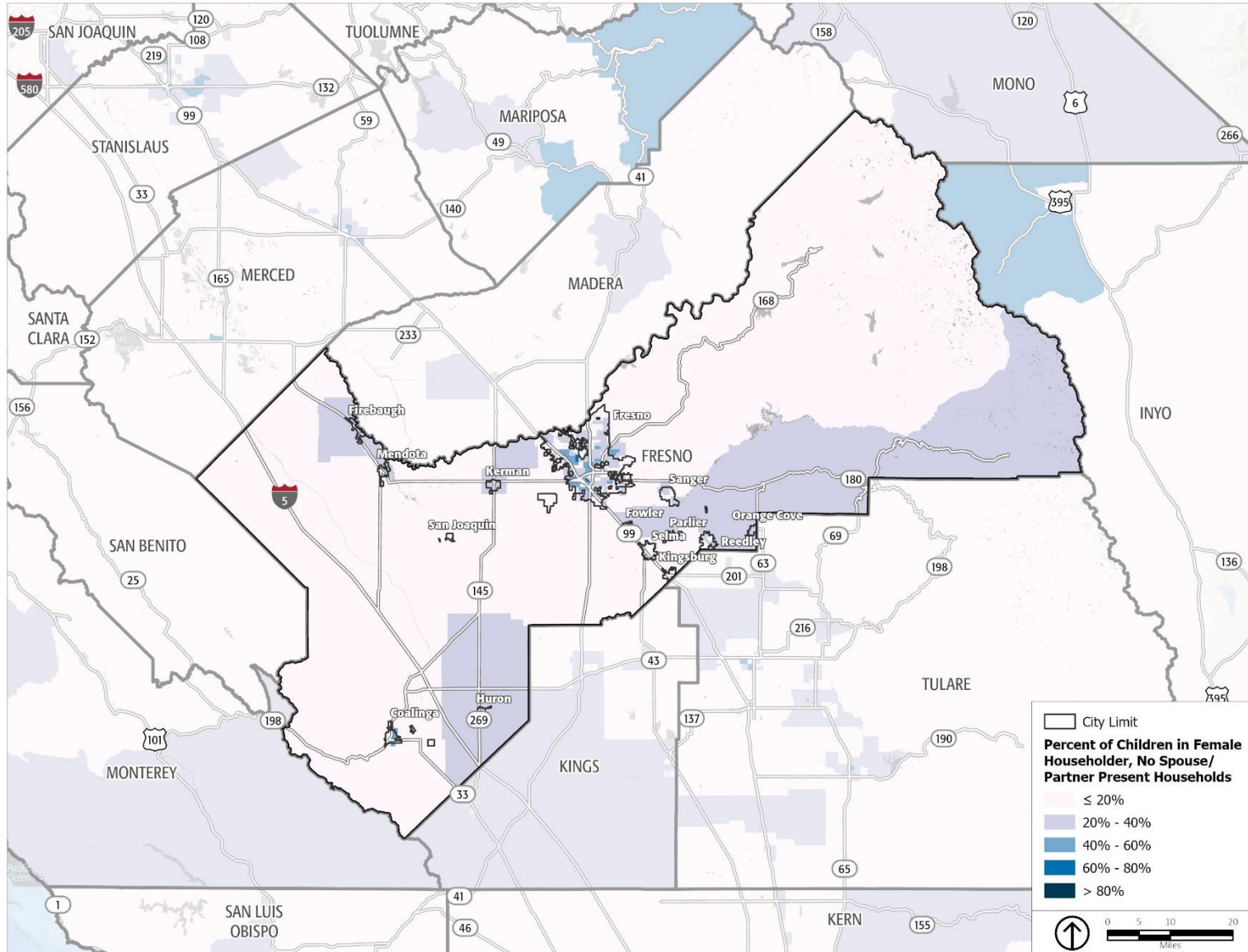
FIGURE 3-19 PERCENTAGE OF CHILDREN IN MARRIED-COUPLE HOUSEHOLDS IN THE REGION



Source: 2015-2019 ACS



FIGURE 3-20 PERCENTAGE OF CHILDREN IN FEMALE-HEADED HOUSEHOLDS IN THE REGION

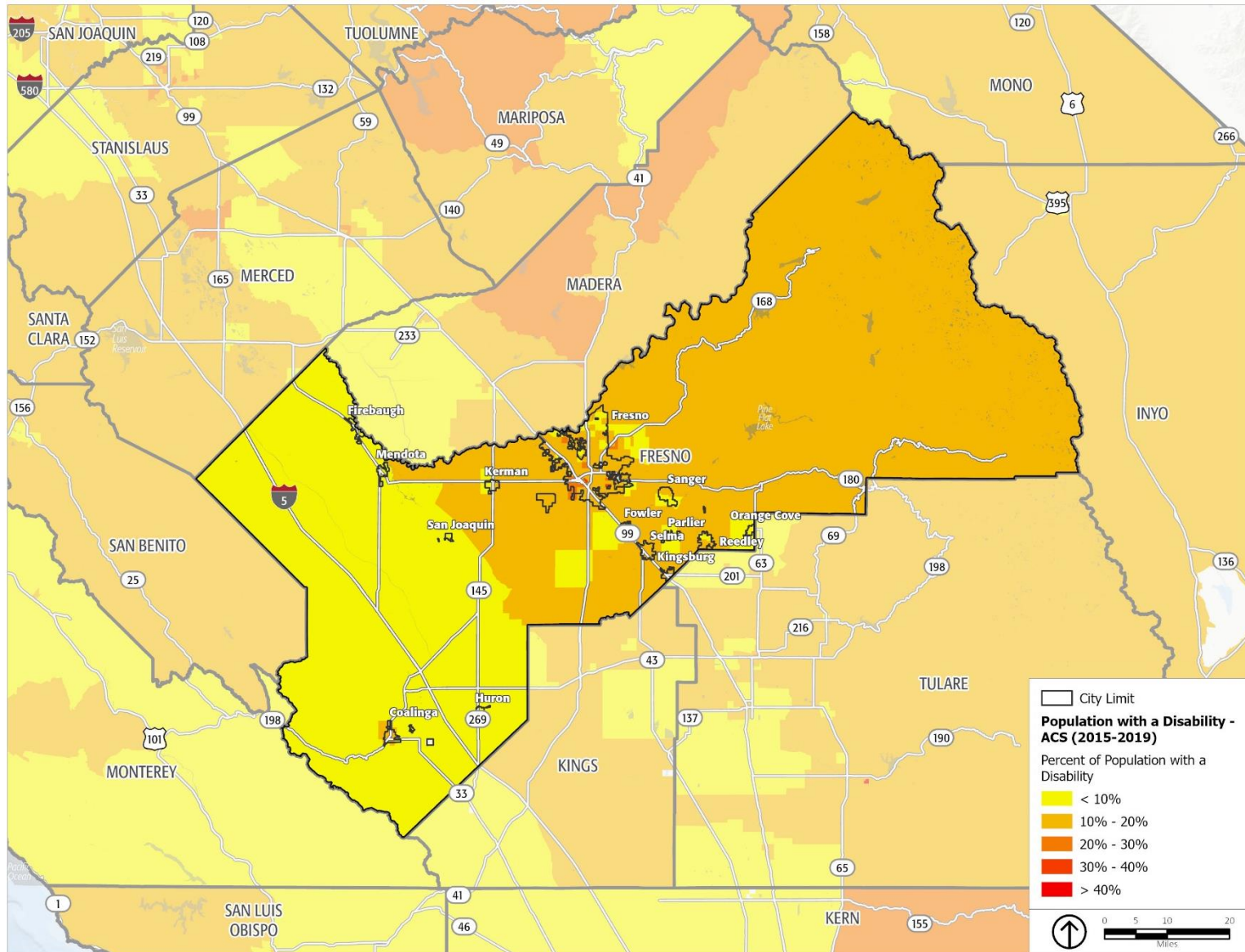


Source: 2015-2019 ACS

## ***Disability Rates***

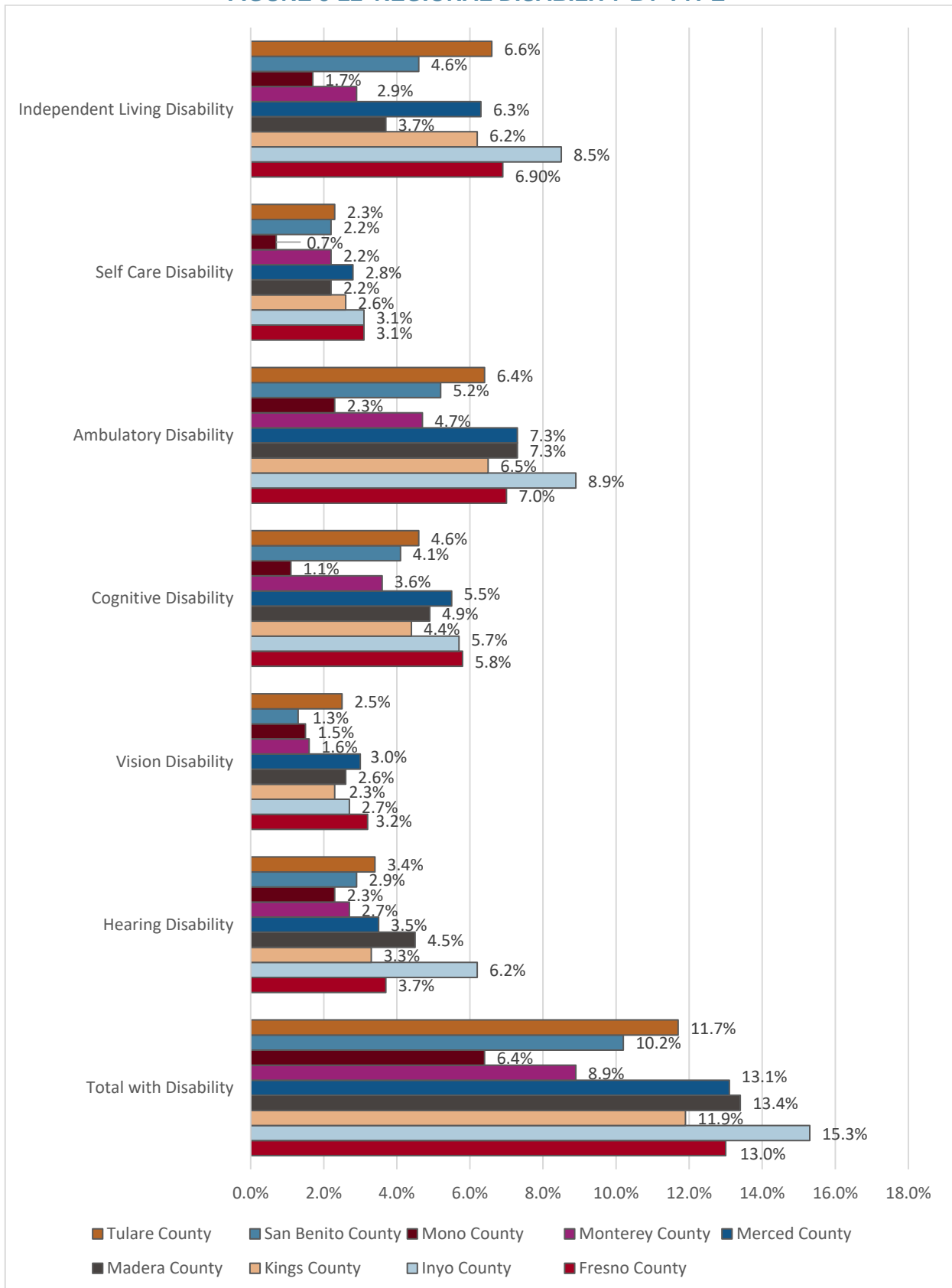
**Figure 3-21, Population with a Disability in the Region,** and **Figure 3-22, Regional Disability by Type,** identify that a majority of Fresno County has a disability rate of 13.0 percent. The proportion of the population with disabilities range from a low of 6.4 percent in Mono County to a high of 15.3 percent in Inyo County, with the rates in Merced and Madera Counties slightly exceeding that of Fresno County. Monterey County and San Benito County to the west report a lower incidence of persons with disabilities than Fresno County and the remainder of the region. Overall, independent living and ambulatory disability are the most common types of disability experienced, with the highest incidence of cognitive and vision problems found in Fresno County. Inyo County reports the highest proportion of persons experiencing independent living problems, followed by Fresno County and then Tulare County, reflecting the more urban opportunities found in the cities of Fresno, Clovis Visalia, and Tulare.

FIGURE 3-21 POPULATION WITH A DISABILITY IN THE REGION



Source: 2015-2019 ACS

FIGURE 3-22 REGIONAL DISABILITY BY TYPE



Source: 2016-2020 ACS

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In Fresno County, the only areas having a concentration of persons with a disability over 20.0 percent are in the cities of Fresno and Clovis, suggesting a correlation between housing opportunities for seniors in more urbanized areas with access to public transportation, services, and amenities. The other jurisdictions in Fresno County either contain a population of which less than 10.0 percent of the population reports a disability, or the jurisdiction is split between areas of less than 10.0 percent, and 10.0 to 20.0 percent of the households experiencing one or more disabilities.

As shown in **Table 3-2, Regional Demographic Characteristics of the Population with a Disability**, 41.6 percent of the population in Fresno County with a disability falls into the over 65 age group, suggesting that the higher rate of disability in the Fresno/Clovis area is likely due to the concentration of seniors. With the exception of these two areas of senior populations, disability rates in Fresno County largely reflect patterns seen throughout the San Joaquin Valley, with slightly higher rates of disability in the more urbanized areas in Tulare and Madera Counties. This is likely due to proximity to services and accessible housing options that are often desirable to persons with disabilities. Regional service providers indicate that residents living with disabilities prefer to live independently but limited housing options may restrict options to care facilities. Additionally, senior residents typically make up a substantial share of residents living with disabilities.

**Table 3-2 Regional Demographic Characteristics of the Population with a Disability**

Disability Characteristic	Jurisdiction								
	Fresno County	Inyo County	Kings County	Madera County	Merced County	Monterey County	Mono County	San Benito County	Tulare County
<b>Race and Ethnicity</b>									
White Non-Hispanic	17.1%	19.2%	14.7%	20.0%	18.2%	14.1%	8.2%	14.6%	17.3%
Black or African American	19.5%	29.3%	16.5%	16.2%	19.7%	15.3%	0.0%	14.3%	14.9%
Alaska Native	18.7%	11.7%	17.6%	14.0%	19.0%	14.9%	6.2%	11.0%	17.0%
Asian	10.4%	8.3%	15.2%	12.2%	10.5%	12.2%	1.1%	7.4%	14.6%
Native Hawaiian/Pacific Islander	16.9%	0.0%	4.1%	0.0%	1.2%	13.8%	0.0%	11.1%	9.0%
Some other race or multiple races	10.6%	6.2%	9.3%	11.5%	12.5%	4.9%	4.8%	8.5%	9.0%
Hispanic or Latino	10.8%	7.2%	9.3%	9.3%	10.6%	5.7%	1.6%	7.2%	9.0%
<b>Age</b>									
Under 18 years	4.5%	3.0%	3.7%	4.1%	4.9%	3.3%	1.4%	4.0%	4.7%
18 to 34 years	7.3%	11.0%	6.4%	7.8%	5.8%	4.0%	4.8%	5.2%	5.9%
35 to 64 years	14.6%	10.0%	13.9%	14.0%	15.7%	7.6%	4.8%	10.3%	12.8%
65 years and over	41.6%	38.5%	40.8%	39.8%	44.1%	31.0%	19.6%	31.6%	41.0%

*Note: As a percentage of race/ethnic category*

*Source: 2016-2020 ACS*

## Access to Opportunity

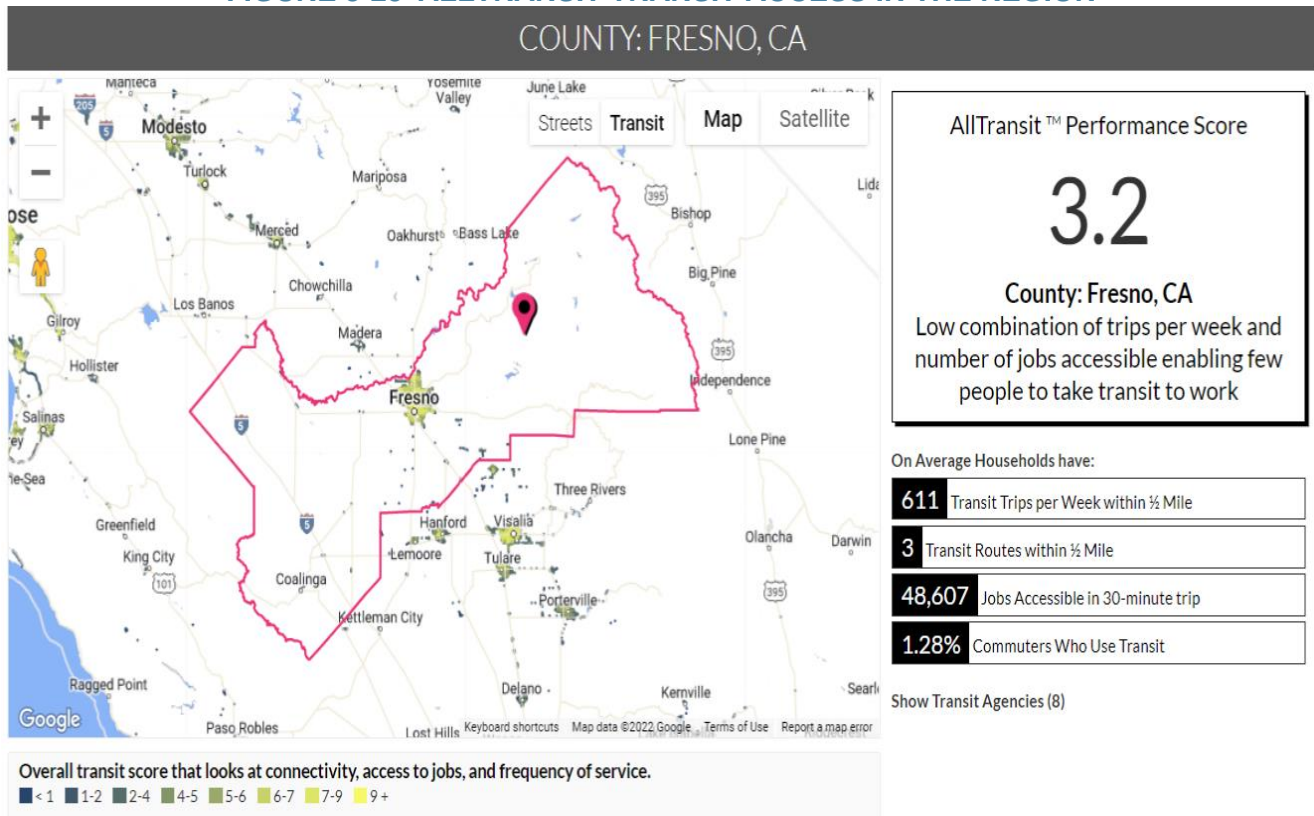
### *Transit Mobility*

Transit mobility refers to an individual's ability to navigate a region daily to access services, employment, schools, and other resources. Indicators of transit mobility include the extent of transit routes, proximity of transit stops to affordable housing, and frequency of transit.

AllTransit is a transit and connectivity analytic tool developed by the Center for Neighborhood Technology for the advancement of equitable communities and urban sustainability. The tool analyzes the transit frequency, routes, and access to determine an overall transit score at the city, county, and regional levels. AllTransit scores geographic regions (e.g., cities, counties, MSAs) on a scale of 0 to 10. **Figure 3-23, AllTransit Transit Access in the Region,** depicts where in Fresno County transit is available and areas with higher connectivity scores. Although it appears public transit in Fresno County is largely isolated within incorporated jurisdictions, with little to no available transit between cities or within unincorporated areas with the exception of cities along SR 99 and SR 41, the AllTransit methodology does not take into account the Fresno County Rural Transit Agency services (described herein), which include 25 local transit operators providing both intra- and inter-city services within and to outlying communities. Therefore, the scores identified at the jurisdictional level may not accurately reflect the transit opportunities available through public service providers. AllTransit ranks the lowest scores in Fresno County in the cities of San Joaquin (0.0), Kerman (0.1), Caruthers (0.5), Selma and Kingsburg (0.7), and higher scores are found in the cities of Clovis (1.1), Coalinga (1.1), Huron (1.2), Reedley (2.2), and Fresno (5.0). Amtrak offers the San Joaquins route with connections from Bakersfield to Oakland or Sacramento, and the Amtrak Thruway system offers city to city connections throughout California that has stops along the SR 99 corridor.



FIGURE 3-23 ALLTRANSIT TRANSIT ACCESS IN THE REGION



As shown in **Table 3-3, Regional AllTransit Performance Scores**, transit accessibility in Fresno County reflects the scores of neighboring counties with large agricultural industries and a few principal jurisdictions, such as Kings, Tulare, and Merced Counties, which also have county-wide, commuter and intercity transit systems, and is somewhat more limited than Monterey County, which, while primarily a rural county, includes the City of Monterey, which is more urban in character. Although in Mono County the AllTransit Score is comparable to Fresno County, the ranking appears to be linked to the regional connectivity of the Eastern Sierra Transit system, which aligns with I-395 between Reno and Lancaster, with a concentration of multiple route systems between Lone Pine, Bishop, and Mammoth Lakes, reflecting the recreational-based character of the county. Overall, in the San Joaquin Valley region, public transit mobility opportunities are typically available in the more urban areas, while in more rural areas there is more limited public transit mobility, with private contracted or individually managed jurisdictional-level services providing intercity and rural area connectivity, reflecting the AllTransit scores below those found throughout Fresno County, and likely below the actual levels of service available.

**Table 3-3 Regional Alltransit Performance Scores**

Jurisdiction	AllTransit Score
Fresno County	3.2
Inyo County	0.4
Kings County	3.0
Madera County	1.2
Merced County	2.4
Monterey County	4.2
Mono County	3.5
San Benito County	1.7
Tulare County	4.1

Source: AllTransit.cnt.org, 2022

In Fresno County, there are several transit options available to residents that do not appear to have been included in the AllTransit methodology, depending on where they live within the county. The Fresno County Rural Transit Agency (FCRTA) operates 25 transit subsystems that operate in 13 rural incorporated cities throughout the Valley (**Table 3-4, Fresno County Rural Transit Agency Intercity Connections**, and **Figure 3-24, Fresno County Rural Transit Agency Intercity Routes**). Several of the connections operate on fixed-route schedules, although most are on demand or require reservations. None of the services are available on Sunday, while Sanger Transit, Rural Transit, Reedley Transit, and Coalinga Inter-City Transit offer Saturday service. The FCRTA's transit services are available to the elderly (60+), disabled, and veterans at no charge and to the general public within each of the 13 rural incorporated cities of Fresno County.

**Table 3-4 Fresno County Rural Transit Agency Intercity Connections**

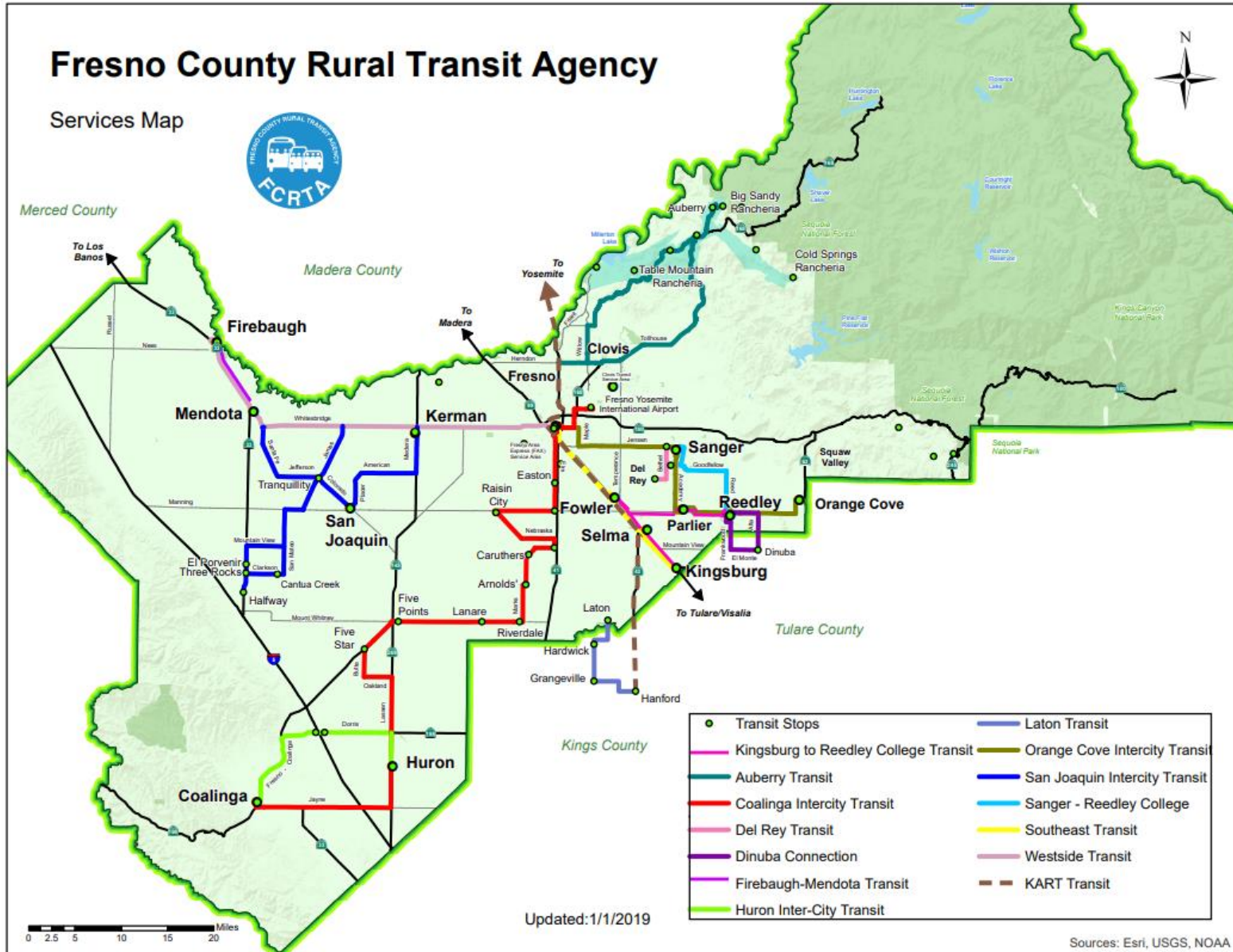
Fixed Route/ On Demand	Fresno County Rural Transit Agency Services	
	SubSystem Provider	Transit Service Routes
On Demand	Auberry Transit	Provides transit service between the foothill communities and the Big Sandy and Cold Springs Rancherias, inter-city service to the Fresno-Clovis area is available Tuesdays and requires 24-hour advance reservation.
On Demand	Coalinga Transit	Provides Dial-A-Ride service within the City of Coalinga.
Fixed Route	Coalinga Intercity Transit	Provides scheduled round-trip service from Coalinga to the Fresno-Clovis Metropolitan Area with stops in Huron, 5-Points, Lanare, Riverdale, Caruthers, Raisin City, Easton.
On Demand	Del Rey Transit	Provides service within the Community of Del Rey and to and from City of Sanger.
Fixed Route	Dinuba Connection	Travels from Dinuba in Tulare County to Reedley in Fresno County. Transfers to Cutler-Orosi, Orange Cove, Parlier, Sanger, and the Fresno-Clovis Metropolitan Area are available. Stops include the Dinuba Vocational Center, Adventist Medical Center, Reedley College, Palm Village Retirement Community, and Walmart.
On Demand	Firebaugh Transit	Provides local intracity transit service.
On Demand	Firebaugh-Mendota Transit	Provides local intercity transit service between Firebaugh and Mendota.
On Demand	Fowler Transit	Provides local intracity transit service.
On Demand	Huron Transit	Provides local intracity transit service.

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Fixed Route/ On Demand	Fresno County Rural Transit Agency Services	
	SubSystem Provider	Transit Service Routes
Fixed Route	Huron Inter-City Transit	Scheduled round-trip service between Huron and Coalinga.
On Demand	Kerman Transit	Dial-A-Ride provides (demand responsive) curb-to-curb service to the general public.
Fixed Route	Kings Area Regional Transit (KART) – Hanford Fresno Transit	Provides transportation from Hanford in Kings County to the Fresno-Clovis Metropolitan Area. Stops include Valley Children’s Hospital, the Veteran’s Hospital, and Kaiser Hospital.
Fixed Route	Kingsburg to Reedley College Transit	Provides scheduled round-trip service between Kingsburg, Selma, Fowler, and Parlier to Reedley College.
Fixed Route	Laton Transit	Operated by KART with scheduled round-trip intercity service between Laton and Hanford with stops in Grangeville and Hardwick.
On Demand	Mendota Transit	Provides local intracity transit service.
On Demand	Orange Cove In-City Transit	Provides local intracity transit service.
Fixed Route	Orange Cove Intercity Transit	Scheduled round-trip inter-city service through Orange Cove, Reedley, Parlier, Sanger to the Fresno-Clovis Metropolitan Area.
On Demand	Parlier Transit	Provides local intracity transit service.
On Demand	Reedley Transit	Provides local intracity demand responsive service.
On Demand	Rural Transit	Addresses the previously unmet transit needs of truly rural area residents living beyond the existing transit service areas, which is considered outside the city limits and Spheres of Influence (SOIs) of the 15 incorporated cities in Fresno County. Requires 24-hour advance notice.
On Demand	Sanger Transit	Local intracity transit service.
Fixed Route	Sanger Express to Reedley	Service from the Sanger Community Center to Reedley College.
On Demand	San Joaquin Transit	Intracity and inter-city service from San Joaquin to Tranquility, Cantua Creek, Halfway, El Porvenir, and Three Rocks. Requires reservations or Dial-A-Ride is available with reservations and limited on-call availability.
On Demand	Selma Transit	Local intracity transit service.
Fixed Route	Southeast Transit	Round-trip inter-city service between Kingsburg, Selma, and Fowler to the Fresno-Clovis Metropolitan Area.
Fixed Route	Westside Transit	Round-trip inter-city service between Firebaugh, Mendota, and Kerman to the Fresno-Clovis Metropolitan Area.

Source: Fresno County Rural Transit Agency, 2022

FIGURE 3-24 FRESNO COUNTY RURAL TRANSIT AGENCY INTERCOUNTY ROUTES



Source: Fresno County Rural Transit Agency, 2019

## SECTION 3: REGIONAL ASSESSMENT OF FAIR HOUSING

FCRTA offers connections to the Fresno-Clovis Metropolitan Area through the following area transportation providers:

- Fresno Area Express (FAX) with 16 scheduled, fixed-route service with connections to Valley Children’s Hospital in Madera County
- FAX’s Handy Ride Americans with Disabilities Act (ADA) demand-responsive services
- Clovis Transit’s Stageline with two scheduled, fixed-route services
- Clovis Transit’s Round-Up’s demand-responsive ADA services
- Kings Area Rural Transit (KART) scheduled, fixed-route service to Fresno and Hanford
- Dinuba Connection scheduled fixed-route travels from Dinuba to Reedley with transfers to Cutler-Orosi, Orange Cove, Parlier, Sanger, and Fresno
- Yosemite Area Regional Transit System offers a fixed-route system from Fresno to the Yosemite Valley with options for commuter passes, and reduced fares for seniors, veterans, and persons with disabilities
- ValleyRides rideshare matching service for commuters within the San Joaquin Valley region

While there are a variety of transit options available in Fresno County, residents in many smaller incorporated jurisdictions, agricultural, and rural communities are more limited than elsewhere in the region to demand-responsive transit options that do not offer weekend service, which may limit employment opportunities for those employed in certain occupations, such as retail, medical/hospital, or restaurant services, and present a barrier to housing mobility for those households reliant on transit.

### ***Housing Mobility***

Housing mobility refers to an individual’s or household’s ability to secure affordable housing in areas of high opportunity, move between neighborhoods, and purchase a home if they so choose. Indicators of housing mobility include distribution of Housing Choice Vouchers (HCVs), availability of rental and ownership opportunities throughout the jurisdiction, and vacancy rates. A “healthy” vacancy rate is considered to be approximately 5.0 percent, indicating that there are available housing units for those seeking housing, but not an oversaturated market that results in homes left unused. In Fresno County, the vacancy rate in 2020 was approximately 5.7 percent, indicating a relatively “healthy” vacancy rate, reflecting a fairly similar rate as most primarily agricultural counties in the surrounding region (**Table 3-5, Regional Vacancy Rates**). This suggests that residents living in Fresno County, or seeking to live in Fresno County, have similar mobility options overall compared to most of the region, with the more tourism and recreational/natural resource-based counties, Mono and Inyo, having higher proportions of vacancies based likely on the seasonal rental nature of their economies. Mobility based on vacancy varies within Fresno County by jurisdiction is discussed further herein.



Table 3-5 Regional Vacancy Rates

Jurisdiction	Total Housing Units	Occupied Housing Units	Vacant Housing Units	Percentage Occupied	Percentage Vacant
Fresno County	338,441	319,296	19,195	94.3%	5.7%
Inyo County	9,469	8,046	1,423	85.0%	15.0%
Kings County	46,287	44,100	2,987	95.3%	4.7%
Madera County	49,572	45,607	3,965	92.0%	8.0%
Merced County	87,783	83,464	4,319	95.1%	4.9%
Monterey County	143,631	131,789	11,842	91.8%	8.2%
Mono County	13,589	5,474	8,115	40.3%	59.7%
San Benito County	20,365	19,484	826	95.7%	4.3%
Tulare County	150,562	141,987	8,575	94.2%	5.8%

Source: Department of Finance E-5 City/County Population and Housing Estimates, 2022

HCVs, or Section 8 vouchers, provide assistance to lower-income households to secure housing in the private market that might otherwise be unattainable. In Fresno County, vouchers are allocated by the Fresno Housing Authority to residents throughout the county, including both incorporated and unincorporated areas. Section 8 participants can use their voucher to find the housing unit of their choice that meets health and safety standards established by the local housing authority. The housing authority will then subsidize an amount up to the fair-market rent (FMR) established by HUD toward the contract rent, with any remainder to be paid by the participant. The subsidy increases housing mobility opportunities for Section 8 participants and ensures that they are provided safe housing options. Fresno County falls within the Fresno MSA, for which HUD establishes FMRs annually to be used as the baseline for Section 8 subsidies (**Table 3-6, Fresno MSA Fair-Market Rents, 2022**).

Table 3-6 Fresno MSA Fair-Market Rents, 2022

Unit Size	FMR
Studio	\$899
1-bedroom	\$904
2-bedroom	\$1,137
3-bedroom	\$1,607
4-bedroom	\$1,847

Source: HUD, 2022

In Fresno County, HCV use is most concentrated within the City of Fresno with rates up to 52.2 percent of households in tracts along SR 41 (1,800 HCVs in four tracts) and a concentration of areas with rates between 15.0 and 30.0 percent of households in the central portion of the city and along the SR 99 corridor. The higher rates of HCV use also tend to correspond to, or are adjacent to, census tracts where public housing or subsidized housing is located. Although there are pockets of HCV use between 15.0 and 30.0 percent in the surrounding San Joaquin Valley region, within the cities of Tulare and Merced in the vicinity of SR 99, Fresno County is the only jurisdiction within the greater San Joaquin Valley region with such a high concentration of HCVs.



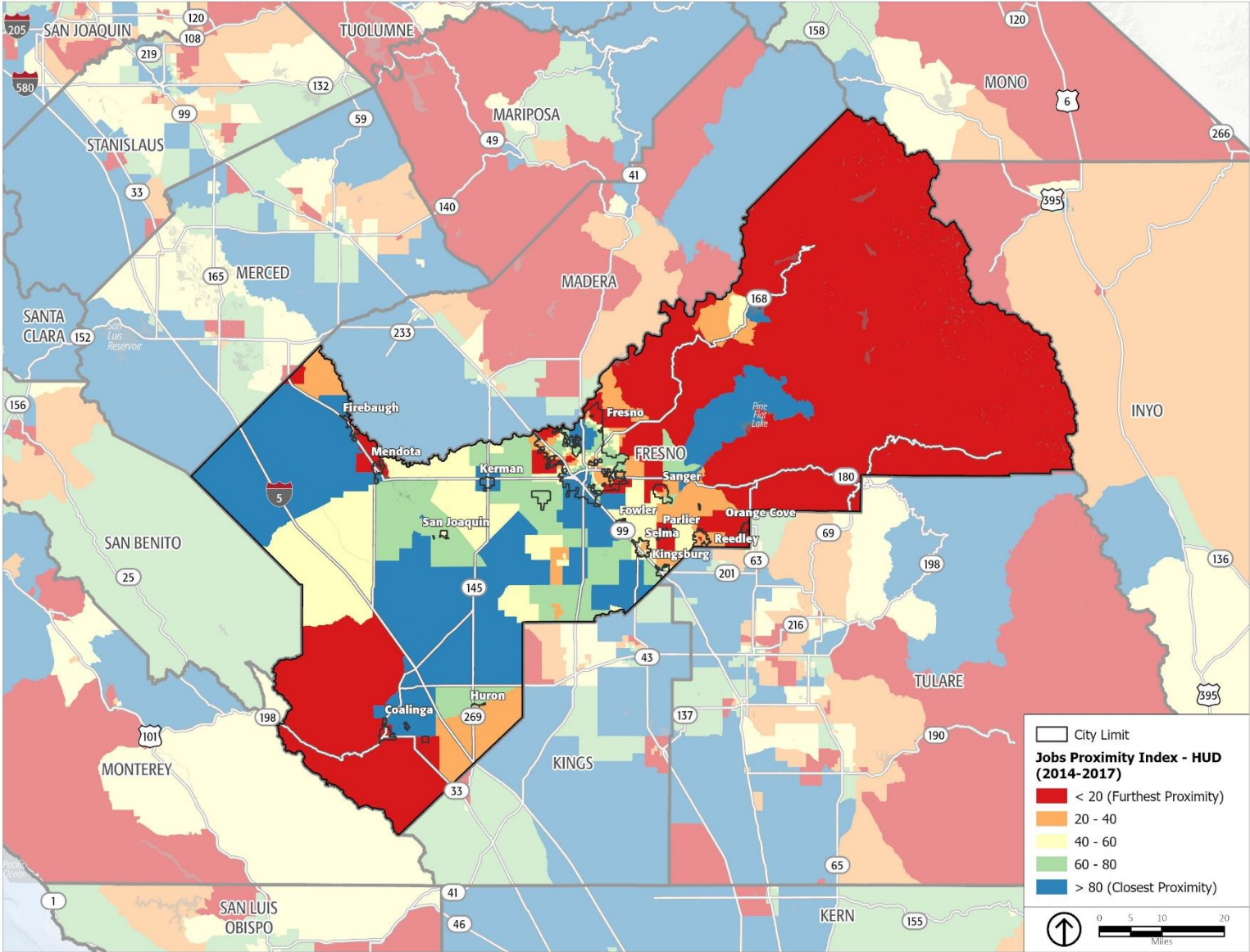
## ***Employment Opportunities***

HUD developed two indices to analyze access to employment opportunities: the jobs proximity index and the labor market engagement index. The jobs proximity index identifies census tracts based on their proximity to employment opportunities and the labor market engagement index scores labor force participation and human capital in each tract, with consideration of unemployment rates and educational attainment. For both indices, a higher score indicates stronger job proximity or labor force participation.

According to these indices, Fresno County has fairly comparable proximity to jobs as the adjacent Madera and Tulare Counties. In Fresno County, stronger proximity scores are found to the west of SR 99 and lower proximity scores are found to the east towards the Sierra Nevada range and rural western edges of the counties. However, much of the land that identifies as having the closest job proximity in these eastern areas and counties to the north of Fresno County is rural farmland or open space, which suggests that the property owner lives and works on-site, compared to residents' access to employment opportunities within incorporated jurisdictions. Labor force engagement patterns in Fresno County more closely reflect the neighboring Madera and Tulare Counties, where population distribution and industries are similar to most of Fresno County.

Higher labor force engagement scores are evident in the western side of Fresno, including the unincorporated county islands in northern Fresno, and the majority of Clovis and unincorporated area immediately adjacent to Clovis on the east, as well as in the more urbanized jurisdictions found within Fresno County and in adjacent Madera and Tulare Counties along SR 99 and SR 41 (**Figure 3-25, Regional Jobs Proximity**, and **Figure 3-26, Regional Labor Market Engagement**). The area with the lowest labor force engagement in Fresno County is in the furthest western tract that includes the cities of Mendota and Firebaugh adjoining San Benito County. In Firebaugh, there is a sizable senior population (22.0 percent of the total households), a population more likely to be retired, although this does not apply to Mendota. However, given that there remains a sizeable working force in these cities, other factors are likely to influence the low labor force engagement scores.

FIGURE 3-25 REGIONAL JOBS PROXIMITY

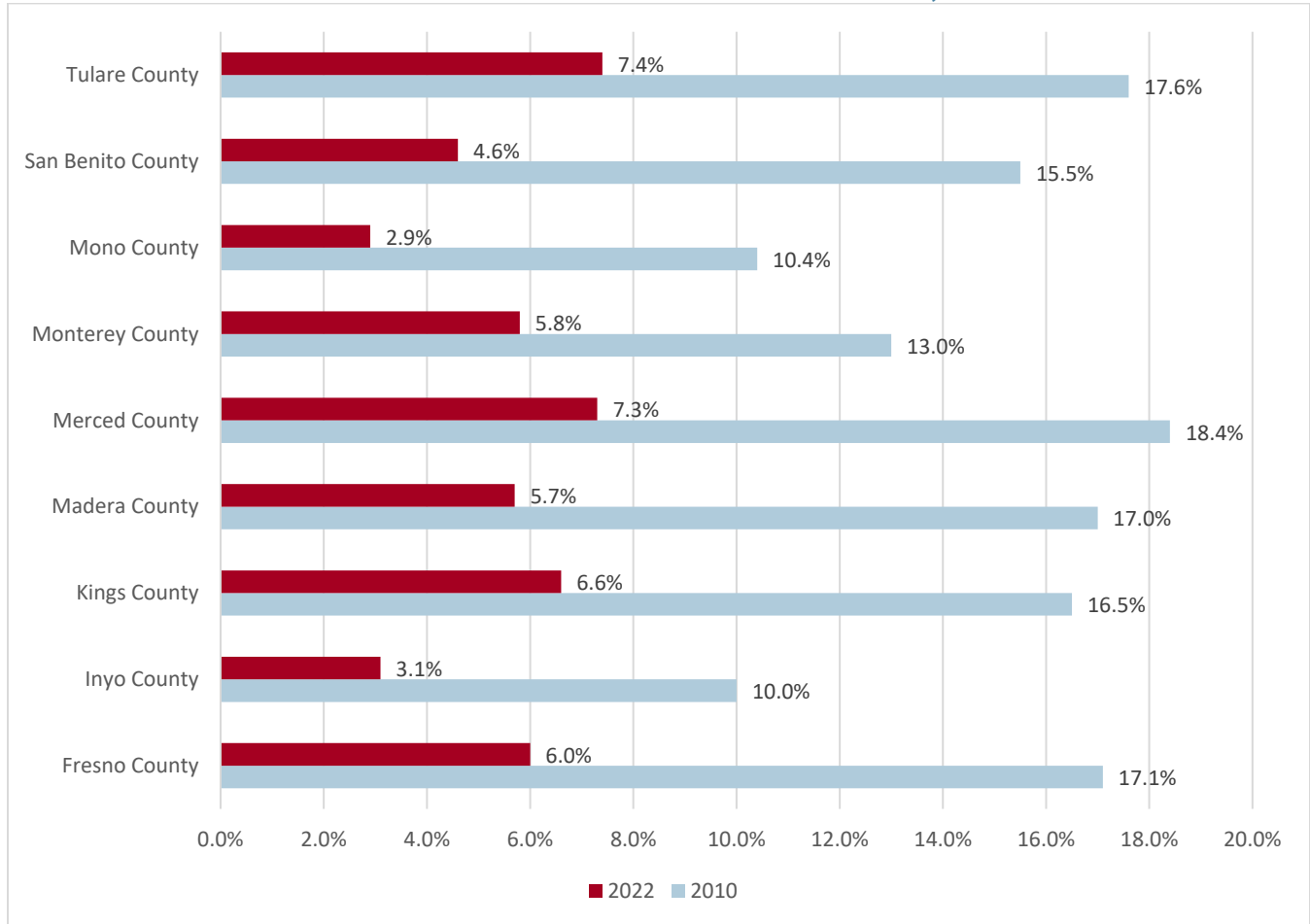


Source: HUD, 2017



As shown in **Figure 3-27, Regional Unemployment Rates, 2010-2022**, the unemployment rate in Fresno County in 2022 is moderate at 6.0 percent, in comparison to other counties in the adjacent counties region, including Tulare, Merced, and Kings Counties at 7.4 percent, 7.3 percent, and 6.6 percent, respectively. The lowest unemployment rates correspond to the least urbanized counties, Inyo and Mono, which are largely sportsmen based-tourism economies associated with travelers to the Mammoth Lakes recreation area, with ranching as the local industry. However, Fresno County saw one of the largest decreases in unemployment since 2010, surpassed only by Madera and Merced Counties, and closely followed by Tulare, San Benito, and Kings County.

**FIGURE 3-27 REGIONAL UNEMPLOYMENT RATES, 2010-2022**



Source: California EDD, 2022

The U.S. Census Longitudinal Employer-Household Dynamics (LEHD) reports the distance and direction between home and work for residents of each jurisdiction and the ratio between jobs and households. According to LEHD, approximately 72.8 percent of Fresno County's labor force works within the county and 27.2 percent work outside Fresno County. In comparison, 37.7 percent of the Tulare County workforce, 52.7 percent of the Kings County workforce, and 56.7 percent of the Madera County workforce work outside of the county in which they reside. Of the 27.2 percent of the Fresno County labor force that commutes outside of the county, 4.2 percent travel to destinations within adjacent Tulare County, 3.8 percent travel to adjacent Madera County, and 1.6 percent travel to Kings County. Approximately 2.7 percent commute into Los Angeles County and 1.5 percent into Santa Clara County. Overall, approximately 27.2 percent of the individuals that work in Fresno County commute in from areas



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outside of the county, with the largest shares coming in from Tulare County (4.8 percent), Madera County (3.8 percent), and Kings County (2.2 percent).

The greatest concentration of jobs are in the City of Fresno (71.2 percent of Fresno County jobs), City of Clovis (10.6 percent), City of Reedley (2.8 percent), City of Sanger (2.5 percent), and the City of Kerman (2.1 percent). Approximately 57.3 percent of Fresno County residents live within 10 miles of their job. Of those residents commuting 10 to 24 miles, 24.6 percent commuted northwest into the City of Fresno from the southern jurisdictions of Fowler, Selma, Parlier, and Kingsburg, whereas 24.0 percent traveled south or southwest from the City of Fresno and Clovis towards the jurisdictions along SR 99. Approximately 17.6 percent of Fresno County residents report commuting more than 50 miles to their job, with 35.5 percent commuting northwest into the Bay Area, and 29.2 percent into Tulare County and towards Bakersfield. In comparison, 34.7 percent of residents in Madera County live within 10 miles of their job, and 21.7 percent live more than 50 miles from their job; in Tulare County, 45.7 percent of residents live within 10 miles of their job, and 25.0 percent live more than 50 miles from their job; and in Kings County, 38.7 percent of residents live within 10 miles of their job, with 24.5 percent living more than 50 miles from their job.

In Fresno County, the jobs-household ratio, which is an indicator of whether there is a balance between the number of jobs and the number of households, was 1.23 in 2020 according to 2016-2020 American Community Survey (ACS). This ratio suggests that there was a surplus of jobs in Fresno County to support the number of households, which may partially contribute to the number of commuters coming from outside of the county for work. This also indicates that there is a shortage of housing to support the job base in this region. Generally, Fresno County appears to have sufficient housing for those jobs in the county filled by residents, as 72.8 percent of the jobs in the county are filled by residents according to U.S. Census LEHD data. However, Fresno County still has a higher rate of unemployed persons than the overall rate of unemployment in the state regardless of the job opportunities, which also suggests that there is a lack of correlation between the types of employment opportunities in the region and the job qualifications and experience of the residents in Fresno County.

### ***Educational Opportunities***

School quality is often tied to housing, with neighborhoods or communities with higher median incomes and home values often having access to higher-performing schools than residents of lower-income neighborhoods. Income distribution influences home values and property taxes, and therefore funding for public schools. As such, school districts with higher concentrations of affordable housing typically have lower test scores in schools, creating a cyclical problem of not offering these students equal educational opportunities. Therefore, disparities in access to strong school opportunities serves as an indicator of fair housing and equal access to opportunities.

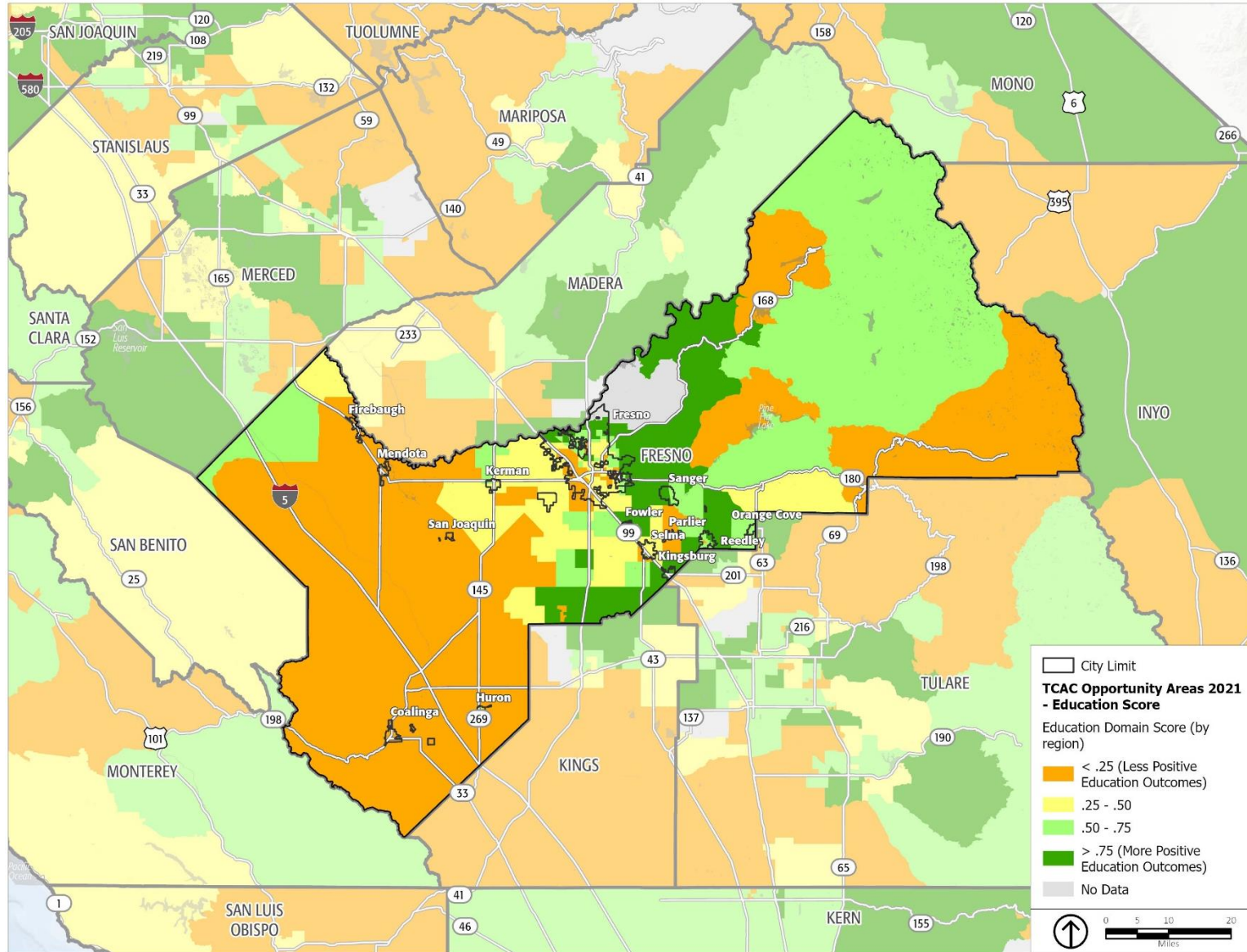
Each year, the California Department of Education (DOE) publishes performance metrics for public schools in the state, including student assessment results for English Language Arts and Mathematics as they compare to the state grade-level standards and demographic characteristics of each school's student population. The characteristics reported on include rates of chronic absenteeism and suspension, percentage of students that are socioeconomically disadvantaged, percentage of students that are in foster care, percentage of students learning the English language, and the percentage of high school students that are prepared for college. Chronic absenteeism refers to the percentage of students who are absent for 10.0 percent or more of instructional days that they were enrolled at the



school, with the state average being 10.1 percent of students. Students who are eligible for free or reduced-priced meals, or who have parents or guardians who did not receive a diploma, are considered socioeconomically disadvantaged. TCAC and HCD rely on this data from DOE to determine the expected educational outcome in each census tract and block group within the state. TCAC and HCD's educational domain score reflects mathematics proficiency, reading proficiency, high school graduation rates, and student poverty rates of all schools for which this data is available, culminating in a score ranging from 0 to 1, with higher values being the most positive expected educational outcome.

In 2021, TCAC/HCD reported the strongest projected educational outcomes for students in the cities of Clovis, Kingsburg, Sanger, and the unincorporated communities of Riverdale, Auberry, and Caruthers as well as the unincorporated areas east of Clovis and west of Sanger as well as portions of the county along the southern boundary from Riverdale to east of Reedley (**Figure 3-28, Regional TCAC/HCD Educational Domain Scores**). However, the unincorporated county areas with the highest educational scores according to TCAC/HCD, also have the lowest population density in the county, and likely either attend the higher-performing schools in adjacent jurisdictions or are home schooled. As such, for a regional analysis, the TCAC/HCD map may not accurately compare educational opportunity in Fresno County to the surrounding region. However, similar TCAC/HCD Educational Domain patterns are seen in adjacent Tulare, Merced, and Madera Counties. At the local level, data based on school performance is more readily available and likely more accurate.

FIGURE 3-28 REGIONAL TCAC/HCD EDUCATIONAL DOMAIN SCORES



Source: TCAC/HCD, 2021

The HUD School Proficiency Index more accurately reflects school performance by residential living patterns in the region. The HUD School Proficiency Index ranges from 0 to 100, with higher values indicating better school performance. Though demographic patterns have changed throughout the region slightly since 2010, as discussed in the local assessment, typically schools in Fresno County and throughout the region are more proficient in areas of increased population density and affluence or in affluent unincorporated areas, particularly in the portions of the county east of the Cities of Clovis and Fresno (see **Figure 3-29, HUD School Proficiency Index**). Although residents of Fresno County in the vicinity of Fresno and particularly Clovis have access to higher-performing schools than the western portion of the county, schools throughout the remainder of Fresno County generally score lower than those in much of Monterey County, and portions of Tulare County, which correspond to higher-income areas. To ensure all students have access to a quality education, the local assessment identifies appropriate programs.





## ***Environmental Health***

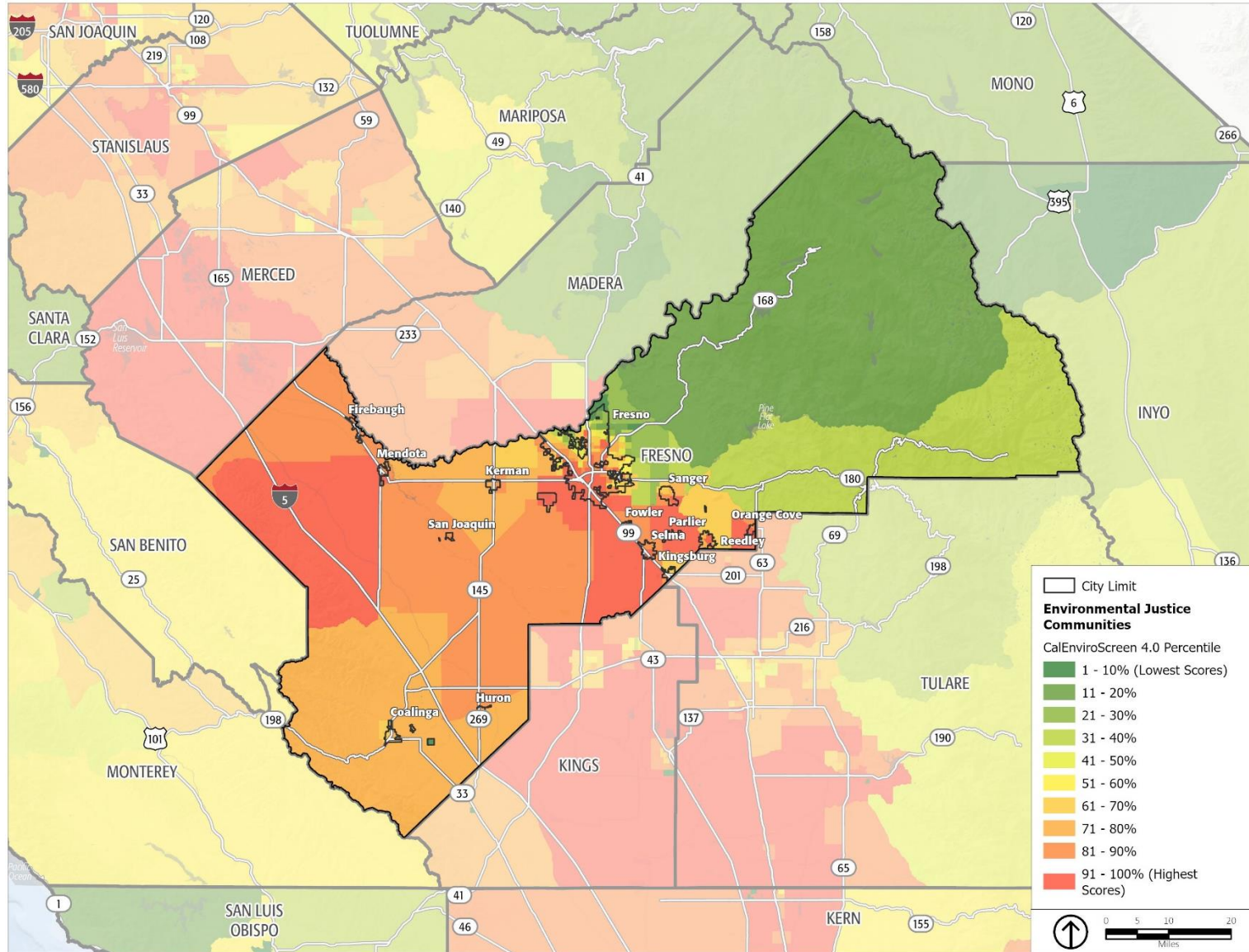
A disadvantaged community or environmental justice community (EJ Community) is identified by the California Environmental Protection Agency (Cal EPA) as “areas that are disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation,” and may or may not have a concentration of low-income households, high unemployment rates, low homeownership rates, overpayment for housing, or other indicators of disproportionate housing need. In February 2021, the California Office for Environmental Health Hazard Assessment (COEHHA) released the fourth version of CalEnviroScreen, a tool that uses environmental, health, and socioeconomic indicators to map and compare community environmental scores. In the CalEnviroScreen tool, communities that have a cumulative score in the 75th percentile or above (25.0 percent highest score census tracts) are those that have been designated as disadvantaged communities under Senate Bill (SB) 535. The cumulative score that can result in a disadvantaged community designation is calculated based on individual scores from two groups of indicators: Pollution Burden and Population Characteristics. Pollution Burden scores exposure to negative environmental hazards, such as ozone concentrations; fine inhalable particles, with diameters that are generally 2.5 micrometers and smaller (PM<sub>2.5</sub>) concentrations; drinking water contaminants; lead risk from housing; traffic impacts; and more. Population Characteristics scores the rate of negative health conditions and access to opportunities, including asthma, cardiovascular disease, poverty, unemployment, and housing cost burden. For each indicator, as with the cumulative impact, a low score reflects positive conditions.

Much of Fresno County, particularly the western area and the cities along the SR 99 corridor, have high cumulative scores, as shown in **Figure 3-30, Regional CalEnviroScreen Percentiles**. This is a result of high scores for indicators of pollution burden, primarily pesticides, drinking water contaminants, particulate matter, and ozone, although the western portion of the county is primarily agricultural land with limited residential development, so these scores are likely a result of agricultural industry practices. In the surrounding region, high percentiles are mostly concentrated in the urbanized communities along SR 99 and prevalent in the rural agricultural areas. Fresno County closely reflects the agricultural areas of Merced, Madera, Tulare, and Kings Counties. Within each jurisdiction of Fresno County, patterns differ as a result of level of urbanization and socioeconomic population characteristics; however, regionally, Fresno County reflects jurisdictions to the north and south rather than the eastern Mono and Inyo County and western San Benito and Monterey County jurisdictions.

The Public Health Alliance of Southern California developed the Healthy Places Index (HPI), a supplemental data tool, in partnership with the Virginia Commonwealth University’s Center on Society and Health. The tool predicts life expectancy based on community conditions. Community condition indicators include economic stability, neighborhood and built environment, health and access to health care, education, social and community context. The HPI provides a single health metric for each Census tract using 25 community characteristics. Higher HPI values indicate healthier conditions. The HPI also reflects agricultural areas as least healthy due to pesticides, dust, and agricultural runoff, as well as exposure to industrial and road pollution, which contribute to low (unhealthy) scores in the more urbanized areas, particularly those along the SR 99 and SR 41 corridors in Tulare, Madera, Kings, and Merced Counties.



FIGURE 3-30 REGIONAL CALENVIROSCREEN PERCENTILES



Source: COEHHA, 2021

The counties within San Joaquin Valley and surrounding jurisdictions to the east and west in the Fresno County region have a challenging environmental context as a major agricultural producer and part of the San Joaquin Valley air basin, raising serious air and water quality concerns. Agricultural production can harm water quality by discharging fertilizer contaminants into the groundwater via runoff. Over time, the region’s water supply has contended with a wide range of contaminants, including nitrates, arsenic, and pesticides. Due to geographic, topographic, meteorologic, and environmental conditions, the region’s air basin has particular challenges for air quality. Given the regional context, the local assessment places an emphasis on assessing disproportionate impacts pollutant exposure has on disadvantaged communities or lower-income housing sites in their purview.

## Disproportionate Housing Need and Displacement Risk

### *Overcrowding*

Overcrowding occurs when the number of people living in a household is greater than the home was designed to hold. The U.S. Census Bureau considers a household overcrowded when there is more than one person per room, excluding bathrooms, hallways, and kitchens, and severely overcrowded when there are more than 1.5 occupants per room. A typical home might have a total of five rooms that qualify for habitation under this definition (three bedrooms, living room, and dining room). If more than five people were living in the home, it would be considered overcrowded. Overcrowding is strongly related to household size, particularly for large households, and the availability of suitably sized housing. A small percentage of overcrowded units is not uncommon, and often includes families with children who share rooms or multi-generational households. However, high rates of overcrowding may indicate a fair housing issue resulting from situations such as two families or households occupying one unit to reduce housing costs (sometimes referred to as “doubling up”). Situations such as this may indicate a shortage of appropriately sized and affordable housing units as overcrowding is often related to the cost and availability of housing and can occur when demand in a jurisdiction or region is high.

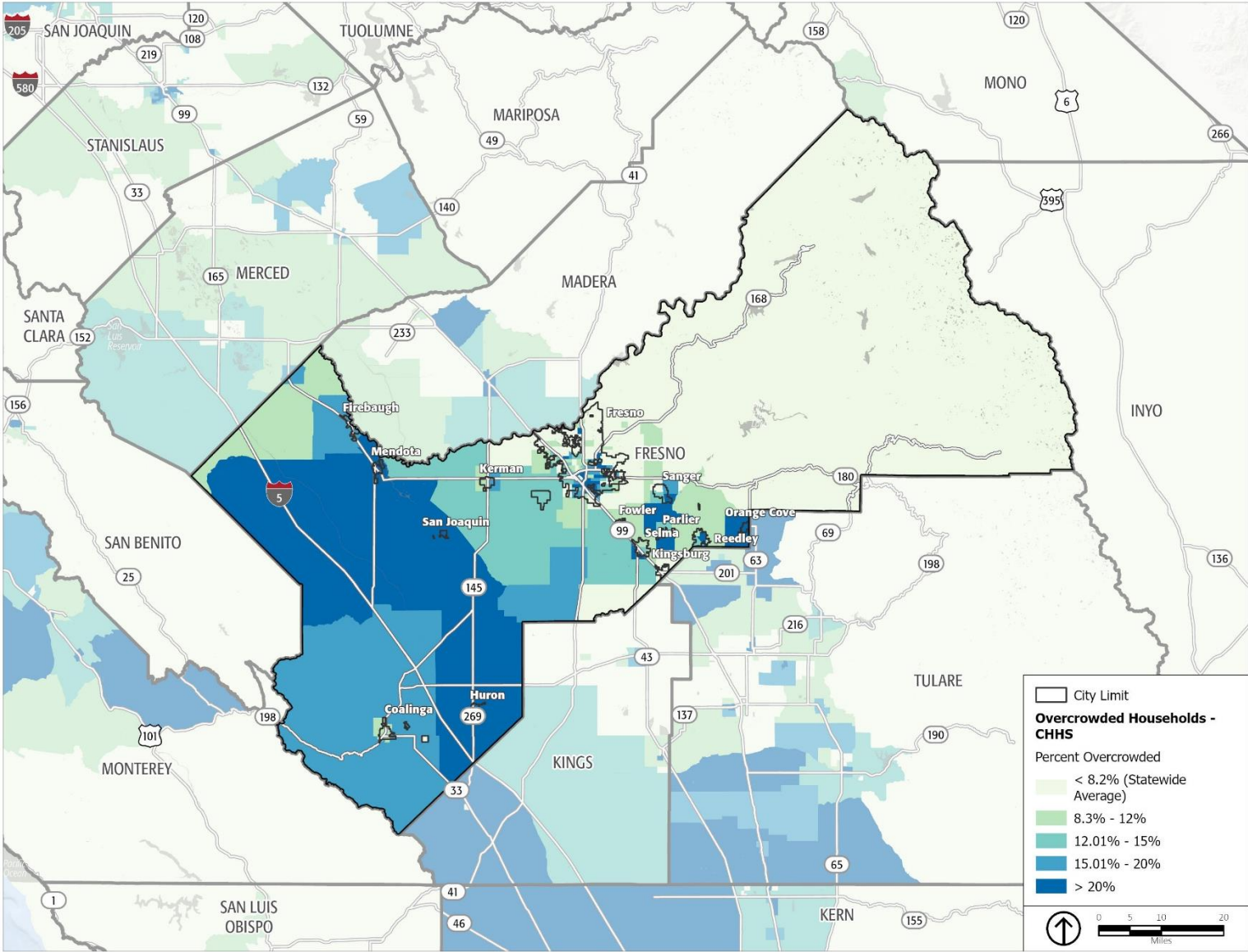
In Fresno County, approximately 6.1 percent of households experience overcrowding and 3.6 percent experience severe overcrowding, as presented in Table 2-21, *Overcrowding by Tenure (2020)*, in the Needs Assessment. Overcrowding is a greater problem among renter-occupied households, at 8.6 percent of households, which exceeds the statewide average of 5.2 percent compared to 3.9 percent of owner-occupied households, which falls below the statewide average.

As shown in **Figure 3-31, Overcrowded Households in the Region**, Fresno County has some areas in the City of Fresno, jurisdictions to the south along SR 99, and in the western jurisdictions with higher incidence of overcrowding, including concentrations above 20.0 percent of households. The overall rate of overcrowding countywide is lower compared to some of the counties in the region to the north and south along SR 99, and fairly equivalent to Merced and Kings Counties. Following the trends of several other fair housing indicators in the region, the overall rate of overcrowding is lower in Inyo, Mono, and San Benito Counties, although each has a particular tenure population experiencing a higher incidence of overcrowding. Among renter households, Fresno County has significantly lower overcrowding rates than Madera, Monterey, San Benito, and Tulare Counties (**Figure 3-32, Reginal Overcrowded Households by Tenure**), although the rates of severely overcrowded renters in Fresno County is higher than all counties except for Monterey County. Typically, areas with higher rates of lower-income households and more dense housing types have higher rates of overcrowding, as is seen in census tracts within or

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adjacent to the incorporated jurisdictions in the region, although overcrowding also is shown in some of the agricultural areas, suggesting the presence of extended or large families or lack of appropriately sized housing units. Many farmworkers pay market rates for their housing, since most farm owners do not provide housing for their workers, and many publicly owned or managed housing complexes are restricted to families. Because market-rate housing may be unaffordable, workers may share a housing unit with other workers to afford housing costs, resulting in severely overcrowded living situations. The rate and pattern of overcrowding in Fresno County generally reflects the communities in the immediate region, with higher rates of renter overcrowding, although homeowner overcrowding rates are lower in Fresno County than the majority of jurisdictions in the region. The relatively lower rates of overcrowding in Fresno County may indicate that there are more appropriately sized housing opportunities at a range of price points to meet housing demand than is found in other areas of the region, although concentrations of overcrowding are more prevalent in the more densely developed City of Fresno.

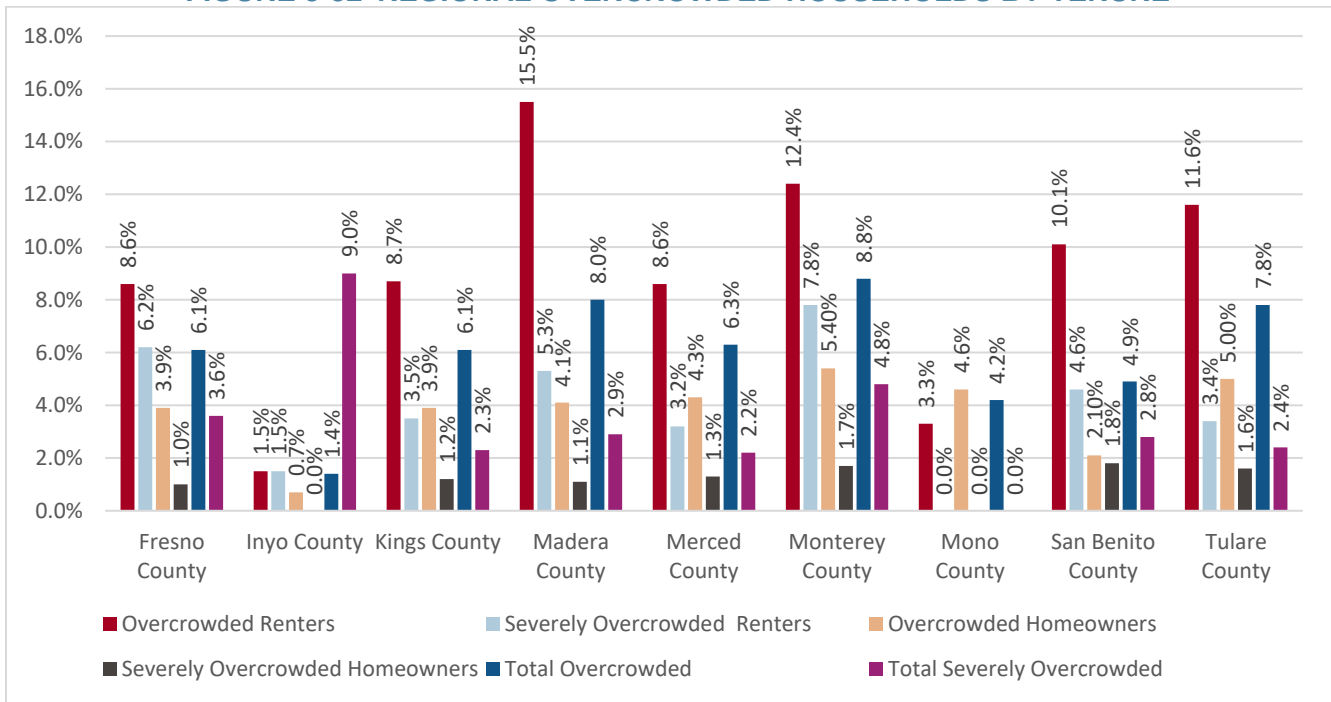
FIGURE 3-31 OVERCROWDED HOUSEHOLDS IN THE REGION



Source: CHHS, 2021



FIGURE 3-32 REGIONAL OVERCROWDED HOUSEHOLDS BY TENURE



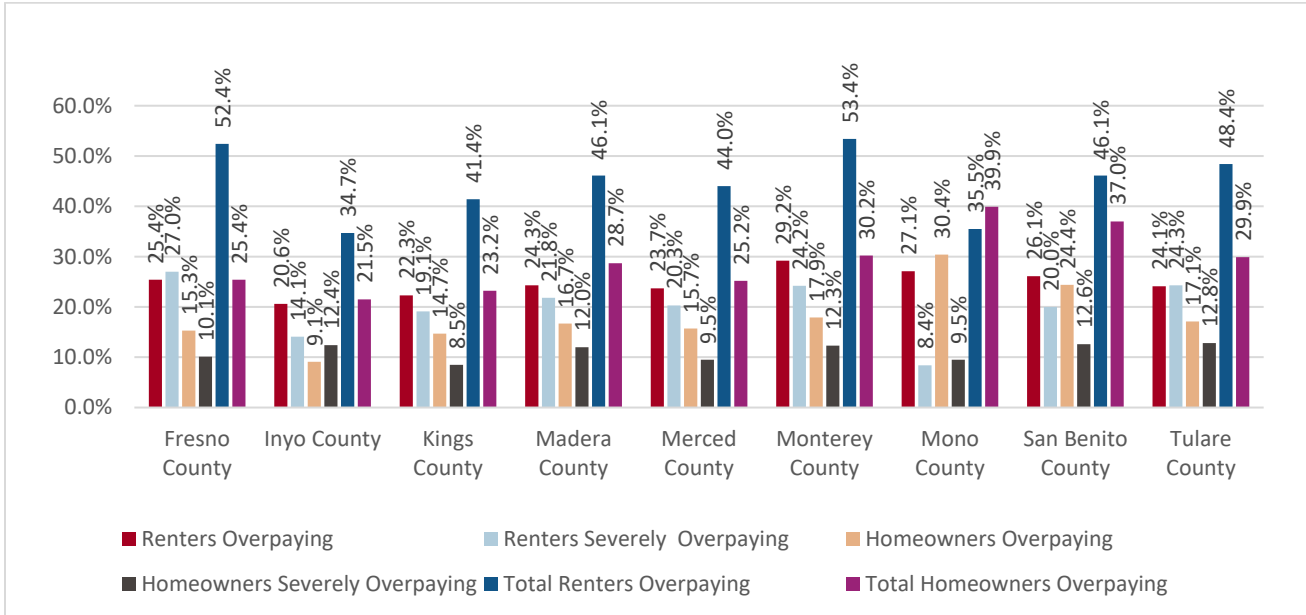
Source: 2016-2020 ACS

### Overpayment

HUD considers housing to be affordable for a household if the household spends less than 30.0 percent of its income on housing costs. A household is considered “cost-burdened” if it spends more than 30.0 percent of its monthly income on housing costs, while those who spend more than 50.0 percent of their income on housing costs are considered “severely cost-burdened.” In Fresno County, approximately 25.4 percent of all households were cost-burdened in 2020, and 16.3 percent were severely cost-burdened (**Figure 3-33, Overpayment Rates in the Region**). Of these households, a significantly larger proportion of renters experienced overpayment than owners. This trend can be seen throughout both the region, on average over 15.0 percent of owners and over 22.0 percent of renters are cost burdened, and generally over 25.0 percent of homeowners and 20.0 percent of renters are severely cost burdened. Fresno County is comparable to surrounding counties, with 15.3 percent of owners and 25.4 percent of renters cost burdened and 10.1 percent of owners and 27.0 percent of renters severely cost burdened. While owner overpayment rates in Fresno County are comparable or slightly lower than the region overall (with the exception of Kings and Inyo Counties), renter overpayment rates are slightly higher (with the exception of Monterey County). This reflects feedback from stakeholders and service providers received for the San Joaquin Valley REAP, *Taking Stock: A Comprehensive Housing Report for the San Joaquin Valley*, in 2022. Stakeholders throughout the region reported a shortage of rental opportunities resulting in disproportionately high prices for tenants.



FIGURE 3-33 OVERPAYMENT RATES IN THE REGION

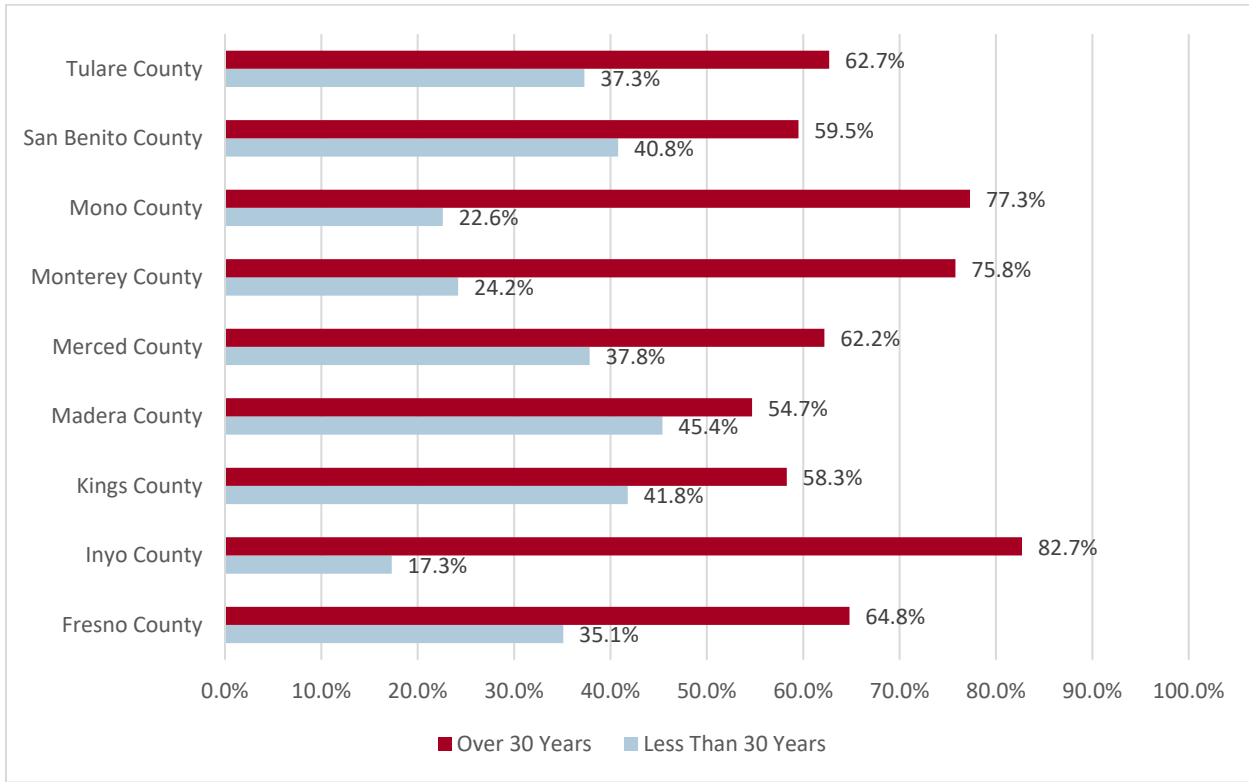


Source: HUD, CHAS 2014-2018

### Substandard Housing

As discussed in the Housing Needs Assessment, housing condition can be an indicator of quality of life. Substandard conditions present a barrier to fair housing as occupants are susceptible to health and safety risks associated with poor housing conditions, as well as at risk of displacement if conditions make the unit uninhabitable or if property owners must vacate the property to conduct repairs. As housing units age, they deteriorate without ongoing maintenance, which can present a fair housing issue for occupants, reduce property values, and discourage private reinvestment in neighborhoods dominated by substandard conditions. Typically, housing over 30 years is more likely to need repairs or rehabilitation than newer units. As shown in **Figure 3-34, Age of Housing Stock in the Region**, approximately 64.8 percent of housing units in Fresno County are older than 30 years and may need repairs. This is relatively comparable to adjacent Merced and Tulare Counties, at 62.2 and 62.7 percent, respectively, yet higher than Madera, Kings, and San Benito Counties, at 54.7, 58.3, and 59.5 percent respectively. However, Mono, Inyo, and Monterey Counties have a higher proportion of older housing than Fresno County, with the largest proportion of homes built during the 1970s. This may indicate a fairly comparable or slightly greater need for rehabilitation in Fresno County compared to the greater region with the exception of the counties that are at the eastern and western edges of the more centralized counties in the valley region.

FIGURE 3-34 AGE OF HOUSING STOCK IN THE REGION



Source: 2016-2020 ACS

### Farmworkers

According to the 2014 San Joaquin Valley Fair Housing and Equity Assessment, Fresno County and adjacent counties have the highest farmworker population compared to other regions in California. Farmworkers often face unique challenges locating affordable housing due to a combination of a higher rate of this population having limited English language proficiency, very low incomes, challenges securing home loans, and barriers to qualifying for rental units. Additionally, USDA data collected at the state and national level indicates that familial composition of farmworkers has changed since 1996 to include more families and fewer individuals; therefore, farmworker housing needs have likely also shifted from primarily seasonal housing for migrant workers to more permanent affordable housing for low wage working families. Although housing for all household types of farmworkers must be accommodated, much of the housing need for family households is best met near services, educational facilities, amenities and other resources that are more readily available in suburban and urban areas.

The Association of Bay Area Governments has identified three types of farmworkers in the state:

- **Permanent Residents:** Permanent residents of the county in which they work and may require housing which accommodates families and may fall into the extremely low-income category for seasonal workers who do not work in the off-season.
- **Migrant Farmworkers:** Perform agricultural labor on a seasonal or temporary basis and typically need housing for individuals, such as single occupancy rooms, bunkhouses, or dormitory style living.

- H-2A Visa Workers: Enter the U.S. under a federal guest worker program for a limited term and require a sponsor employer who provides housing, meals, and transportation to the job site.

The California Institute for Rural Studies (CIRS) reports that an estimated 85.0 percent of farmworkers in the state are from various regions in Mexico, and 5.0 percent from Central America, largely depending on which immigration period they entered the United States. An Indigenous Farmworker Study conducted in 2010 by California Rural Legal Assistance and other private parties estimated that approximately 25.0 percent of farmworkers statewide speak non-Spanish native languages of Mexico (including Zapoteco, Triqui and Mixteco), with significantly higher concentrations (up to one-third of farmworkers) in the Central Valley and Central Coast regions.

### ***History of Farm Working***

A history of farm working in the United States prepared by the National Farm Worker Ministry, an organization that advocates for and represents farmworkers, reports that following the Civil War, the gold rush and concurrent expansion of the railroad system led to California becoming a major agricultural center, in particular Fresno, Tulare, and Kern counties in the San Joaquin Valley. Initially, immigrants from China turned to agricultural labor as rail work diminished, followed by a wave of immigrants from elsewhere in Asia, primarily from Japan, the Philippines, and the Punjab province of India. According to federal law at the time, these newer immigrants were not allowed to own property or become citizens. During WWI, with most local American farm laborers engaged in the war, the demand for farmworkers increased. The Youth and Young Adults (YAYA) Timeline for Agricultural Labor in the U.S.A. reports that the first guestworker program was initiated in 1914 for Mexican labor to meet the need, ending in 1921. Following this, a combination of the Dust Bowl and the Depression brought a surge of migrant workers from the central states to California, as farmers were forced to sell their farms and travel west in search of work. Concurrently, the population of Mexican migrant workers decreased, as pressure increased for this population to leave or be deported during what was called the Mexican Repatriation.

The 2014 San Joaquin Valley Fair Housing and Equity Assessment found that White Dust Bowl farm laborers lived in shacks, tent camps, trailers, even their vehicles, as the Farm Security Administration established only eight farm labor camps in the entire San Joaquin Valley region. Where camp accommodations were provided for non-White farmworkers, they were segregated from the White camps and typically substandard in comparison. Most farmworkers had to find lodging in less desirable neighborhoods in cities or rural settlements, many of which were largely devoid of infrastructure improvements. Labor laws that were passed in the 1930s did not apply to farm workers, excluding them from protections such as worker's compensation, child labor, unionizing and collective bargaining, and overtime pay.

In August 1942, due to labor shortages associated with WWII, and six months after the start of the internment camps and the forced relocation of Japanese farmworkers, the federal government allowed for temporary contract laborers from Mexico as part of the Emergency Farm Labor Relief, or Bracero program. Although the Bracero program was initially established as a temporary wartime measure, Congress extended it through the late 1940s until it was ended in 1964. By the late 1950s, it is estimated that up to 200,000 of the laborers that migrated to the United States as part of this program worked in the San Joaquin Valley, many living in the vacated redlined urban neighborhoods left behind as previous immigrants integrated into the communities and were able to relocate, or within the post-

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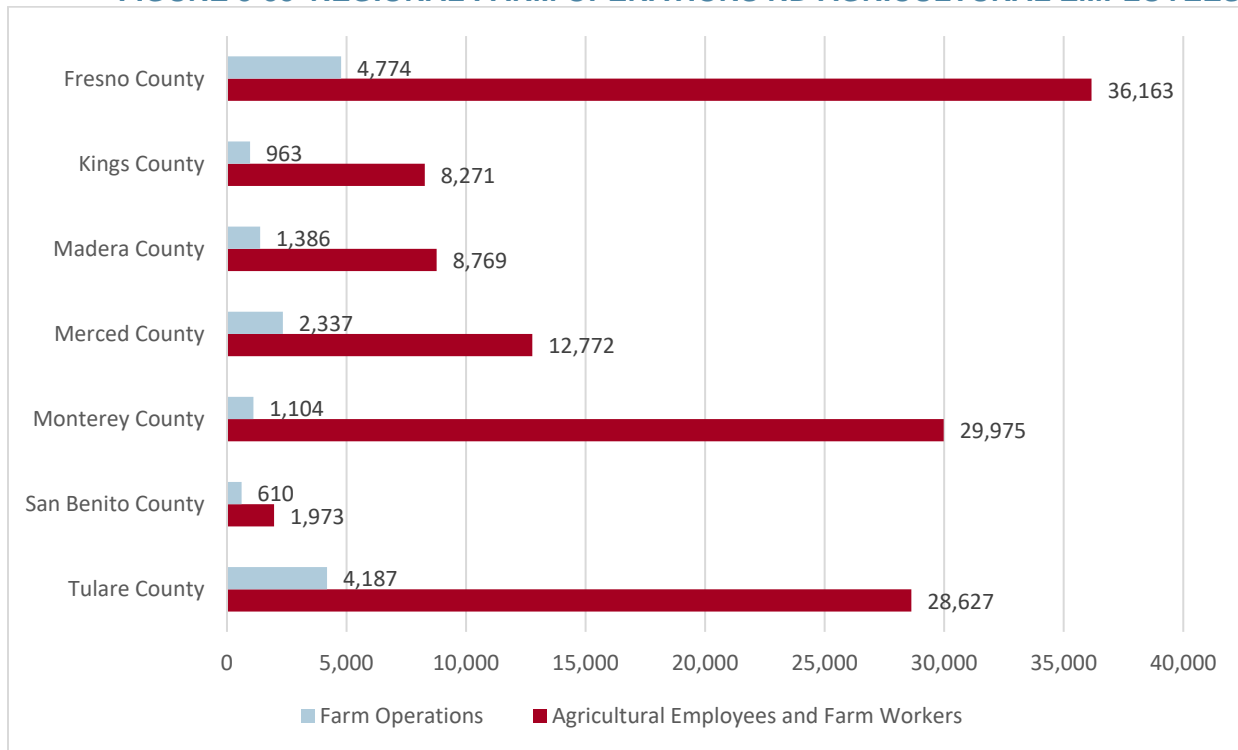
Depression farm labor camps that had been inhabited by the White Dust Bowl migrant laborers. These communities expanded as immigrants from Mexico and Central America continued to fill cheap labor positions.

Many farmworker communities developed in rural areas, just outside of, or within, jurisdictions' spheres of influence in the late 1900s, and often were not included in governmental investment of basic infrastructure as they generally were considered temporary accommodations. Additionally, many of these neighborhoods were exposed to higher rates of environmental pollution due to adjacency of major circulation routes, contaminated water systems associated with pesticides and agricultural runoff, and heavy industrial uses. Many of these neighborhoods have grown into established communities such as Del Rey, Cantua Creek, Easton, Five Points, Tranquility, and Raisin City, as well as others, yet continue to be underserved. These areas are analyzed in more detail in the local assessments of fair housing.

#### ***Key Housing Issues and Trends***

The 2017 USDA Census of Agriculture reported 4,774 farms in Fresno County, a reduction from 5,683 in 2012. Although the 2022 Census of Agriculture has not yet been released, it is likely that this trend that has continued as development occurs at the periphery of jurisdictions, as well as the effect of the drought. As shown in **Figure 3-35, Regional Farm Operations and Agricultural Farmworkers**, Fresno County has the largest number of agricultural operations in the region and 89.5 percent of its land designated for agriculture, followed by Tulare County with 4,187 farms and 81.8 percent of land designated for agriculture. North of Fresno County, both Madera and Merced Counties have fewer agricultural operations, with 1,386 and 2,337 farms, respectively, but a higher proportion of land designated for agriculture (88.2 percent in Madera County and 91.1 percent in Merced County). Similarly, while Kings County only has 968 reported farm operations, 91.8 percent of its land is designated for agriculture. In contrast, counties west of Fresno County are less agriculturally oriented. Although there are 1,104 farms in Monterey County, only 61.3 percent of the land is designated for agriculture, and there are 610 farms in San Benito County with 75.6 percent of acreage designated for agriculture. Both Mono and Inyo Counties have fewer than 100 farms each, and therefore are not reflected on **Figure 3-35**.

FIGURE 3-35 REGIONAL FARM OPERATIONS AND AGRICULTURAL EMPLOYEES



Source: 2016-2020 ACS and U.S. Census of Agriculture, USDA, 2017

Note: Inyo and Mono Counties are not included in chart as the proportion of persons employed in agriculture, forestry, fishing and wildlife was below 4.0 percent

Local stakeholders estimate that official counts of farmworkers significantly underestimate the true numbers, as undocumented residents often do not participate in traditional data collection methods. Further, farmworkers may be difficult to count due to their mobility, shared housing situations, and distrust of authorities. According to the 2016-2020 ACS, the largest concentration of farmworkers in the region are in Fresno County, although this population comprises only 8.8 percent of employed residents in Fresno County. Following Fresno County, Monterey and Tulare Counties have comparable numbers of farmworkers, but the population represents a notably higher proportion of the employed persons population in each county, at 15.8 and 15.6 percent of the labor force, respectively. Further, 15.0 percent of the labor force in Madera County, 15.4 percent in Kings County, and 11.7 percent in Merced County are employed in agricultural operations. Only San Benito (6.7 percent), Mono (2.0 percent), and Inyo Counties (3.7 percent) have lower proportional representations of farmworkers than Fresno County.

As discussed previously, farmworkers face unique housing challenges due to low wages, high poverty rates, linguistic isolation, and, in many cases, citizenship status. The composition of farmworker households is shifting from primarily migrant individual males to more family households, including a growing number of single female-headed households with children according to the CIRS COVID-19 Farmworker Survey. The combination of socioeconomic characteristics of farmworkers, in Fresno County suggest that the conventional housing resources generally available to such lower-income households often correspond to TCAC/HCD Areas of High Segregation and Poverty, and/or HUD R/ECAPs. Further, due to housing costs, multiple families or individuals may share a single-family unit, converted garages, or accessory structures. The correlation between potential areas where



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farmworkers may access affordable housing opportunities is discussed in more detail in each of the individual jurisdictions' assessments of fair housing.

According to the State of California's Analysis of Impediments to Fair Housing, privately owned employee housing licensed by the State of California has been steadily diminishing and currently only accommodates a small fraction of agricultural workers in the state. According to HCD's Employee Housing Facilities database, there are 562 units of farmworker employee housing throughout Fresno County with potential to house approximately 1,260 persons, including 6 set-aside units in Parlier Apartments in Parlier and Maldonado Plaza in Firebaugh. There are 645 units for H-2A workers, which can accommodate approximately 2,540 workers, which often are bunkhouses, dorms, or motel rooms. An additional 261 farmworker housing resources, including beds in the Parlier Migrant Center, single units, apartment complexes managed by the Fresno Housing Authority for seasonal and permanent occupancy, and 60 units of farmworker housing in Mendota, developed as part of the USDA Rural Area Development Program.

Between September 2021 and January 2022, the Fresno County conducted a Farmworker Survey and a Farmworker Employer Survey. A second round of each survey was conducted between February 2022 and July 2022. In total, the County surveyed 240 farmworkers, of whom 100 were homeowners, and 170 farm employers. Overall, less than 1 percent of all farmworkers surveyed desired to live in some type of farm labor housing, and 47.0 percent of non-homeowner households desired homeownership opportunities for single-family units. Of farm employers, 25 currently have some type of farm labor housing on-site. Of those that do not have on-site farm labor housing, 28 reported that they would consider adding labor housing as single houses or cottages and 1 specified that they would consider adding apartment style farm labor housing. Based on phone conversations, dairy farmers were most interested in providing on-site housing due to the 24-hour staffing required. All employers indicated that they would consider adding housing if financing was provided by the government or through grants.

#### ***Housing Need***

The surveys conducted by CIRS and Fresno County indicate that traditional farm labor and worker camp housing is not desired by most Fresno County farmworkers and laborers, and only a small number of Fresno County farm employers are interested in providing on-site housing if government subsidies were available. Further, based on survey results farmworkers expressed greater interest in off-site housing options, reflecting the concerns of farm employers of finding farmworkers to live in on-site units.

While many of the farmworkers in Fresno County may reside in communities where affordable housing resources are available, and some permanent residents may be eligible for HCVs, they must compete with other lower-income households, often resulting in overcrowding, substandard conditions, and overpayment. Often, particularly for single laborers, dwellings are converted garages, vehicles, farm buildings, or tents. Undocumented laborers face even greater challenges in securing housing. The shortage of affordable housing for the farmworker community represents a significant barrier to fair housing for this population in Fresno County, as well as the region and statewide. Throughout Fresno County, farmworkers face a disproportionate need for safe and affordable housing options that provide access to jobs as well as other resources and amenities. This need is analyzed locally to inform each jurisdiction's Action Plan in the local Assessment of Fair Housing.

## ***Displacement Risk***

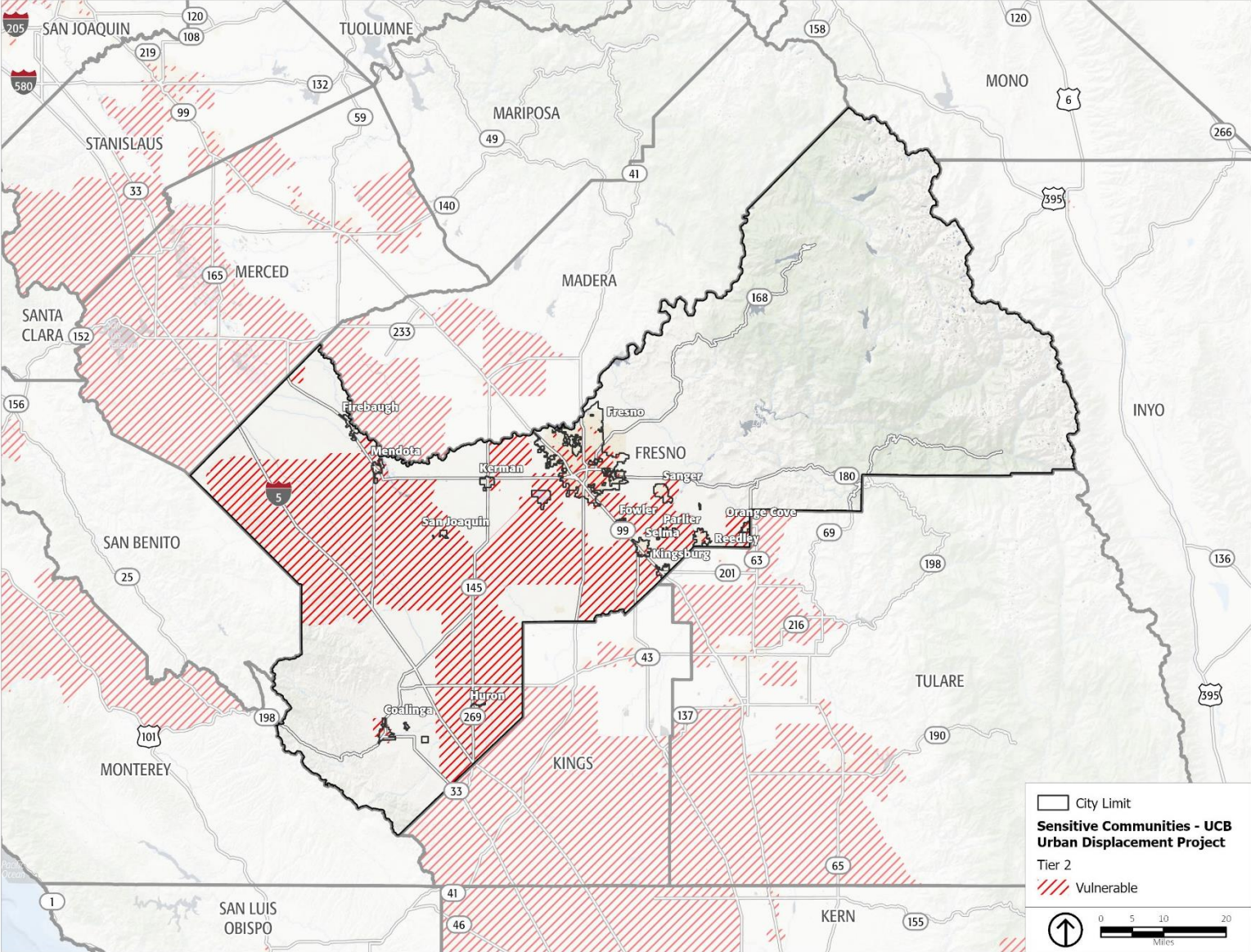
A combination of factors can result in increased displacement risk, particularly for lower-income households. Displacement risk increases when a household is paying more for housing than their income can support, their housing condition is unstable or unsafe, and when the household is overcrowded. Each of these presents barriers to stable housing for the occupants. As discussed in the analyses of Patterns of Integration and Segregation, Overcrowding, and Overpayment, there are disproportionate patterns of concentrated poverty in the county that may correlate with increased displacement risk. The identification of over 40 R/ECAPs in the county is also a significant factor in the potential for displacement, particularly in the incorporated areas of Fresno, Sanger, Reedley, Orange Cove, Mendota, Huron, and San Joaquin, and unincorporated areas east and west of I-5 in the western portion of the county. Other factors contributing to the risk of displacement include those previously discussed, as well as vacancy rates, availability of a variety of housing options, and increasing housing prices compared to wage increases. Additionally, the increase in the incidence of both sheltered and unsheltered homelessness points to the correlation between housing affordability, income, and, in many cases, racial and ethnic characteristics. According to the Urban Displacement Project (**Figure 3-36, Sensitive Communities, 2020**), a large portion of Fresno County, largely corresponding to census tracts with low median incomes and high diversity and/or concentrations of populations of color, have been identified as sensitive communities, which are susceptible to changes if housing prices increase.

The annual rate of increase in average home value or rental prices compared with annual changes in the average income in the county may also indicate an increased risk of displacement due to housing costs outpacing wage increase, a trend that is felt throughout the region, state, and nation. Dramatic increases in home and rental prices have impacted residents throughout the county, though renters are typically disproportionately burdened by housing market increases in annual rate increases, compared to homeowners who have fixed-rate mortgages. For households attempting to enter the homeowner market for the first time, however, the cost of homes and rising interest rates present a barrier for lower-income households to attain homeownership.

According to Zillow and Redfin (July 2022), the average home value in Fresno County has increased 122.6 percent since 2013, an average of 15.3 percent annually. However, the annual average increase in home prices between 2013 and 2020 pre-pandemic was 7.6 percent, while the median home cost increased 12.7 percent during the height of the pandemic between 2020 and 2021, and 28.9 percent between 2021 and 2022. According to Zillow and Redfin, the median sales price of a home in Fresno County jumped from \$291,409 in 2021 to \$375,000 in 2022. As shown in Table 2-22, Home Sales Recorded 2021-2022, in the Needs Assessment, the survey of home sales in each jurisdiction, with the exception of the City of Clovis as no data was available at the time of the survey, and unincorporated areas conducted in May 2022 by CoreLogic, the highest increases in housing costs were seen in Kingsburg, Coalinga, and City of Fresno, followed by Fowler, Kerman, and Selma, as well as the unincorporated communities of Shaver Lake and Caruthers.

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FIGURE 3-36 SENSITIVE COMMUNITIES, 2020



Source: Urban Displacement Project, 2021



While housing costs have increased rapidly, wages have not kept pace. The average median household income in Fresno County has increased an average of 3.1 percent annually from \$45,741 in 2012 to \$57,109 in 2020 according to 2016-2020 ACS data. Until 2020, the annual rate of increase in income was keeping a fairly steady pace with rising housing prices. However, between 2020 and 2022, based on a 2022 HCD estimate of Fresno County median income at \$80,300, the annual rate of increase in household income was 6.8 percent, as compared to the rate of increase in housing prices discussed previously. The difference in these trends indicates growing unaffordability of housing in Fresno County.

In general, the Fresno County region has relatively low housing values and lower housing costs compared to many areas of the state; however, homeowners and renters experience housing cost burdens on par with state levels due to the region's comparatively lower incomes. According to the San Joaquin Valley REAP 2022, estimated home values are at their highest point in decades. The impact of demographic shifts since the start of the COVID-19 pandemic are noticeable in home values in the Fresno County region, with values in several counties having risen nearly \$100,000 since early 2020. As shown in Table 2-24, Fresno County Ability to Pay, in the Needs Assessment, the median home price in Fresno County is only affordable to moderate- and above moderate-income households, based on a family of four. Rent prices in Fresno County have also increased significantly and present a barrier to lower-income households at a comparable rate with home values, at 7.6 percent annually. Between 2014 and 2021, the average rent for a two-bedroom unit, for example, increased from \$1,200 to \$1,835 according to a Zillow 2021 survey, and was affordable only to moderate-income households and above.

Data from Rentcafe.com (2022) indicates that 7.0 percent of units in the City of Fresno rent for less than \$1,000 monthly, 54.0 percent rent for \$1,001 to \$1,500 monthly, 30.0 percent rent for \$1,501 to \$2,000 monthly, and 10.0 percent are above \$2,000 monthly. However, these rent ranges do not differentiate between studio units and three- to four-bedroom units, and therefore the median rent estimate of \$1,480 may not represent the overpayment and overcrowding challenges faced by special needs and larger households. Rentcafe.com also provides average rents for other jurisdictions in Fresno County and adjacent counties, with Clovis at \$1,588, Coalinga at \$1,114, Kerman at \$1,167, Hanford at \$1,581, Sanger at \$1,093, Tulare at \$1,787, Visalia at \$1,691, and Merced at \$1,262. The countywide rate of lower-income renter overpayment is 75.4 percent, with rates exceeding those in the cities of Fresno, Fowler, Reedley, Sanger, and Selma. As renter households within most of the Fresno County jurisdictions comprise between 40.0 and 60.0 percent of the total households, and lower-income renters tend to have higher rates of overpayment than moderate- and above moderate-income renter households, this constitutes a significant proportion of renter households. As discussed in the analysis of Patterns of Integration and Segregation, the highest rates of poverty along the SR 99 corridor are in the City of Fresno, Sanger, Selma, Parlier, and Reedley, corresponding to the highest rates of cost-burdened, low-income renter households. In comparison, the lower-income renter overpayment rate in the unincorporated county is 13.5 percent.

In Fresno County, overpayment is pervasive and is not necessarily linked to areas with a lower median income, although within the county, 60.2 percent of lower-income homeowner households overpay as compared to 25.0 percent of total homeowners; and 75.4 percent of lower-income renters overpay compared to 52.2 percent of total renter households. The highest rates of lower-income homeowner overpayment above the countywide rate are present in Fresno, Kerman, Kingsburg, Mendota, Parlier, Reedley, Sanger, San Joaquin, and Sanger, while the lowest rates are found in the unincorporated county, Coalinga, Fowler, Firebaugh, and Huron.

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Feedback received in response to the San Joaquin Valley REAP, *Taking Stock: A Comprehensive Housing Report for the San Joaquin Valley*, have identified that there is an overall lack of production at any price point, but particularly in multifamily construction and affordable units. For rentals, very low inventory and high cost to initiate tenancy (e.g., deposits, first and last month's rent) may result in the need for hundreds or thousands of dollars up front to secure the rental unit.

According to the California Housing Partnership, the average cost of living for a family of three in the San Joaquin Valley is about \$48,293. This regional cost of living is 14.0 percent below the regional median household income of \$56,247; however, it is 66.0 percent higher than the state minimum wage income of \$29,120.