



# **Analysis of Impediments to Fair Housing Choice 2019-2024**

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June 2019



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## A. Background

The Analysis of Impediments to Fair Housing Choice (A.I.) serves as the fair housing planning document for the County of Riverside Public Housing Authority (PHA) programs that address the entire County, and the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG) programs that address the unincorporated areas of the County, the City of Lake Elsinore (Metro City), and the following Cooperating Cities: Banning, Beaumont, Blythe, Coachella, Canyon Lake, Desert Hot Springs, Eastvale, Indian Wells, La Quinta, Murrieta, Norco, San Jacinto, and Wildomar.

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor. The A.I. examines local housing conditions, economics, policies and practices in order to ensure that housing choices and opportunities for all residents are available in an environment free from discrimination. The AI assembles fair housing information, identifies existing impediments that limit housing choice, and proposes actions to mitigate those impediments.

Equal access to housing (housing choice) is vital to meeting essential needs and pursuing personal, educational, employment, or other goals. Recognizing this fundamental right, the federal government and the State of California have established fair housing as a right protected by law.

### *Fair Housing Laws*

In an effort to end housing segregation, the United States Congress passed the Civil Rights Act of 1968, making housing discrimination based on race, color, national origin, or religion illegal. In 1974, Congress amended the Fair Housing Act to include sex as a protected category. Then in 1988, Congress again amended the Fair Housing Act by passing the Fair Housing Amendments Act<sup>1</sup>, making housing discrimination against families with children and people with disabilities unlawful. The Fair Housing Amendments Act also incorporated accessibility standards for new multi-family units and “reasonable accommodations” for people with disabilities into the Fair Housing Act.

In addition to prohibiting discrimination based on federal laws, the State of California has enacted a number of statutes that mirror and, in certain cases, extend federal fair housing protections. The Unruh Civil Rights Act of 1959<sup>2</sup> and subsequent court decisions require equal access to the accommodations, advantages, facilities, privileges, or services of all business establishments regardless of protected status. The courts have interpreted this Act

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<sup>1</sup>42 U.S. Code §§ 3601 et. seq.

<sup>2</sup>California Civil Code, §§ 51 and 52

to prohibit any arbitrary discrimination based in any class distinction, regardless of whether or not that basis is enumerated in the Act.

The Fair Employment and Housing Act of 1963<sup>3</sup> is the primary state law that prohibits discrimination in the sale, rental, lease negotiation, or financing of housing based on race, color, religion, sex, marital status, national origin, and ancestry. The California Fair Housing Act of 1992 brought state laws into conformity with the Federal Fair Housing Act of 1988 and added protections for people with a “mental and physical disability” and “familial status.” The Act also requires that housing providers allow disabled persons to modify their premises to meet their needs.

The Ralph Civil Rights Act of 1976 provides that all persons have the right to be free from any violence, or intimidation by threat of violence, committed against their persons or property because of their race, color, religion, ancestry, national origin, political affiliation, sexual orientation, sex, age, disability, or position in a labor dispute. The Act prohibits violence or threat of the same in rental housing situations. The Banes Civil Rights Act also forbids interference by force or threat with an individual's constitutional or statutory rights in places of worship, housing, and private property.

The Federal protected classes include:

- Color
- Disability<sup>4</sup>
- Familial status
- National origin
- Race
- Religion
- Sex

The additional State of California protected classes include:

- Age
- Ancestry
- Arbitrary discrimination
- Gender
- Gender identity
- Gender expression
- Genetic information
- Marital status

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<sup>3</sup>California Government Code §§ 12900-12906

<sup>4</sup> The Fair Housing Act uses the term ‘handicap,’ however, we use the term “person with a disability,” to represent this language of the Act.

- Sexual orientation
- Source of income

This report considers impediments to fair housing choice experienced by both federal and State of California protected classes.

### *Defining Fair Housing and Impediments*

In consideration of federal and state fair housing laws and in consultation with the U.S. Department of Housing and Urban Development (HUD) and professionals providing fair housing services, the following definition of fair housing is used for this report:

*Fair housing is a condition in which individuals of similar income levels in the same housing market having a like range of housing choice available to them regardless of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor.*

Within the legal framework of federal and state laws and based on the guidance provided by HUD *Fair Housing Planning Guide* (1996), impediments to fair housing choice can be defined as:

*Any actions, omissions, or decisions taken because of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or*

*Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor.*

To affirmatively promote equal housing opportunity, a community must work to remove or mitigate impediments to fair housing choice. Furthermore, eligibility for federal funding assistance requires the County to comply with federal fair housing laws. Specifically, to receive HUD Community Planning and Development (CPD) formula grants, a jurisdiction must:

- Certify its commitment to actively further fair housing choice;
- Maintain fair housing records; and
- Conduct an analysis of impediments to fair housing.

The County of Riverside actively furthers fair housing choice through the preparation of this A.I. and annual funding of a fair housing service provider. The County of Riverside is dedicated to providing fair housing opportunities to all residents and ensuring compliance with all applicable laws.

## **B. Methodology and Citizen Participation**

Pursuant to Federal Register Notice Docket No. FR-5173-N-18 published May 23, 2018, the County of Riverside prepared this A.I. in accordance with the recommended content and format included in Volumes 1 and 2 of the *Fair Housing Planning Guide* published by the HUD Office of Fair Housing and Equal Opportunity. Subsequent to adoption of this A.I., the County shall take appropriate actions to overcome the effects of any impediments identified through that analysis and maintain records reflecting the analysis and actions.

### *Methodology*

HUD requires jurisdictions that receive federal funding for community development activities to assess the status of fair housing in their community. As a direct recipient of CDBG, HOME, and ESG funds, the County of Riverside is required to update the A.I. every five years and to report the findings and progress in the Consolidated and Performance Evaluation Report (CAPER) submitted to HUD following each program year. The County's last A.I. was published March 2014. This A.I. is a comprehensive update of the 2014 document, including a Fair Housing Plan for 2019-2024, covering the Consolidated Plan period of July 1, 2019 through June 30, 2024.

The purpose of this report is to identify impediments to fair and equal housing opportunities in Riverside County. This A.I. provides an overview of the laws, regulations, conditions, or other possible obstacles that may affect access to housing and other services in Riverside County.

The A.I. contains these six chapters:

1. *Executive Summary.* This chapter provides background on "fair housing," methodology, citizen participation, and a summary of the findings and recommendations identified within the report.
2. *Community Characteristics.* This chapter provides a brief history of the County, a demographic profile, income profile, employment profile, housing profile, special needs housing profile, and key maps to provide the baseline information necessary to form a complete understanding of the County. This chapter provides a broad overview and understanding of the community so that housing needs are clearly defined. Community profile information analyzed in this chapter includes data elements required by HUD in the online Consolidated Plan system (the eCon

- Planning Suite) from the 1990, 2000, and 2010 Decennial Census, 2012-2016 American Community Survey (ACS) 5-Year Estimates and the Affirmatively Furthering Fair Housing Tool (AFFH-T) data Version 4.
3. *Analysis of Private Sector Impediments.* This chapter provides an overview of the private owner-occupied housing market and the renter-occupied housing market. It examines the private-sector impediments to fair housing.
  4. *Analysis of Public Policy Impediments.* This chapter identifies and analyzes a range of public activities that may impede fair housing choice, including governmental land use, development regulations, and community development activities. Potential impediments to fair housing choice are discussed.
  5. *Analysis of Current Fair Housing Activity.* This chapter includes the current fair housing education, enforcement and legal status of any pending cases currently underway in the County.
  6. *Conclusions and Recommendations.* This chapter provides a summary of major issues and recommendations to further fair housing. This chapter also reports on progress made in implementing the prior A.I. This chapter outlines the County’s Fair Housing Plan for 2019-2024 including specific actions to be taken to address identified impediments within designated timeframes.

*Citizen Participation*

The County values citizen input concerning the investment of federal funds. To solicit public participation for this A.I., the County held four Community Meetings at the following locations:

- |                  |   |
|------------------|---|
| <b>DATE:</b>     | December 3 (5 <sup>th</sup> District)   |
| <b>TIME:</b>     | 5:00 - 7:00 p.m.  |
| <b>LOCATION:</b> | Cabazon Community Center<br>50390 Carmen Avenue, Cabazon, CA 92230                      |
| <b>DATE:</b>     | December 5 (3 <sup>rd</sup> District)   |
| <b>TIME:</b>     | 5:00 - 7:00 p.m.  |
| <b>LOCATION:</b> | Murrieta Library Community Room<br>8 Town Square, Murrieta, CA 92562                    |
| <b>DATE:</b>     | December 6 (4 <sup>th</sup> District)   |
| <b>TIME:</b>     | 5:00 - 7:00 p.m.  |
| <b>LOCATION:</b> | County Workforce Development Center - Room 402<br>44-199 Monroe Street, Indio, CA 92201 |

**DATE:** January 2 (1<sup>st</sup> District)  
**TIME:** 6:00 p.m. or soon thereafter – 9:00 p.m.  
**LOCATION:** Mead Valley Community Center  
21091 Rider Street  
Mead Valley, CA 92570

In all, over 20 residents and stakeholders attended the four meetings and their feedback was considered in the development of this A.I.

To further understand the current perspectives of fair housing practices in Riverside County, the County released an “Analysis of Impediments to Fair Housing Choice Survey” to residents in November 2018. The survey consisted of 34 questions related to fair housing issues, community planning needs (such as access to healthcare and transportation), questions regarding schools and questions about the job market. Many of the questions were open-ended, allowing the community to provide additional comments beyond simply answering “yes or no.” The survey was published in English and in Spanish. Links to the surveys were publicized in the public notices for community participation and through email distribution. The survey response period was open for approximately 75 days. During that time, 150 responses were received, many of which contained additional feedback via the open-ended questions. For more information, refer to Appendix D.

After preparing the draft A.I. document, the County published a notice of availability and request for written and oral comments. That notice as published in the Press-Telegram and The Desert Sun. The minimum 30-day public review period began on or about May 2<sup>nd</sup> and concluded on June 11<sup>th</sup>. The draft document was accessible in the following locations:

Riverside County Economic Development Agency - CDBG/ESG Programs  
5555 Arlington Avenue, Riverside, CA 92504  
(951) 351-0700

Riverside County Economic Development Agency-Indio  
44-199 Monroe Street, Suite B, Indio, CA 92201  
(760) 863-2650

On-line at: [www.rivcoeda.org](http://www.rivcoeda.org)

The County Board of Supervisors considered the A.I. at its regular meeting of June 11, 2019. No public comments were received during the public hearing. No written comments were received during the public review and comment period.

### C. Status of Prior Impediments and Recommendations

HUD requires the County to analyze past performance with respect to the resolution of impediments to fair housing choice that were identified in prior A.I.s. The 2014 A.I. identified eight fair housing issues including affordable housing, lack of available housing, discrimination against persons with disabilities, rental advertising and viewing the unit, credit check / leasing, predatory lending / steering, habitability / constructive eviction, and Other Lending / Sales Concerns. All but one of these issues were addressed during the prior planning period or were found to not meet the definition of an impediment to fair housing choice. The issue of discrimination against persons with disabilities is supported through data and FHCRC case files documenting that, in large numbers, persons with disabilities experience discrimination in obtaining or maintaining housing in Riverside County. Each of the prior issues are summarized below, including the original issue, the 2019 status and for discrimination against persons with disabilities, a set of recommended actions to be taken over the next five years.

#### **Affordable Housing**

The 2014 A.I. identified affordable housing as an impediment to fair housing choice, indicating that “one of the biggest problems facing low-income individuals is the gap between what they can afford to pay for housing and the actual cost of that housing.” This remains true in 2019. The 2014 A.I. indicated the County Economic Development Agency (EDA) needed to “alleviate governmental constraints which add to the cost of housing and developer costs.” The 2014 A.I. further indicated that the EDA should “reduce the cost of housing to the consumer, be it rental or single-family homes, through the elimination of unnecessary governmental actions, policies and regulations.”

**2019 Status:** Removed. The 2014 A.I. and the 2019 A.I. update did not reveal specific information indicating that the lack of affordable housing in the community constitutes an impediment to fair housing choice, as defined in this A.I. In other words, the lack of affordable housing in the community is not the result of actions, omissions, or decisions taken because of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor which restrict housing choices or the availability of housing choices; or, actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor. Rather, the lack of affordable housing is a market condition whereby housing prices are out of reach for many low- and moderate-income wage earners.

Although removed as a listed impediment to fair housing choice in this A.I., it should be noted that the County of Riverside EDA and PHA continue to follow federal and state law with respect to establishing local laws and policies that promote the development of affordable housing and remove unnecessary constraints to such development.

### **Lack of Available Housing**

The 2014 AI identified the lack of available housing as an impediment to fair housing choice, indicating that “Housing shortages increase the probability of housing discrimination by creating competition that can be used to disguise unlawful discrimination practices.” The County Economic Development Agency (EDA) needed to “increase the number of agency-funded affordable single and multi-family housing projects.

**2019 Status:** Removed. The 2014 A.I. and the 2019 A.I. update did not reveal specific information indicating that the lack of affordable housing in the community constitutes an impediment to fair housing choice, as defined in the AI. In other words, the lack of available housing in the community is not the result of actions, omissions, or decisions taken because of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor which restrict housing choices or the availability of housing choices; or, actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor. Rather, the lack of available housing is a housing market condition whereby there are an insufficient number of units available to accommodate individuals and households at all income levels.

Although removed as a listed impediment to fair housing choice in this A.I., it should be noted that the County of Riverside EDA and PHA recognize the lack of available housing—particularly for low- and moderate-income people—has the potential to disproportionately affect members of protected classes. For this reason, the County continues to provide as many agency-funded affordable single and multifamily housing opportunities as possible within funding constraints of available programs. These goals are an integral component of the EDA’s Consolidated Plan and the PHA’s Agency Plan submissions to HUD.

### Rental Advertising and Viewing the Unit

The 2014 A.I. indicates that “Potential renters most often begin their search for a home from advertising material. Unfortunately, the language used is often improper and even the use of models may indicate a preference and can be a potential problem. Advertising a “no pets” policy can also be an impediment to Fair Housing if the housing provider is not aware that a service or companion animal is not a pet.”

Further, the 2014 A.I. indicates that “One of the most common discrimination a potential renter may encounter is when viewing the unit. Housing providers may make a judgment based on one’s race, disability, familial status or other characteristic when determining qualifications. In some cases, potential renters are quoted different terms and conditions than other potential renters because of the housing provider’s discriminatory actions.”

**2019 Status:** Addressed. FHCRC continues to provide information and education services concerning the proper way to advertise housing opportunities and to show housing opportunities to prospective tenants. In workshops and fair housing training, FHCRC encourages rental property owners, managers, and realtors to provide written documentation to all applicants which include the listings of all available housing, standard information on the terms and conditions of the application process, posting Fair Housing informational signs and providing Fair Housing literature. Further, FHCRC conducts paired-testing audits under its Fair Housing Initiatives Program grant to identify large-scale abuses such as preferential treatment by management companies and leasing agents based on protected status.

### Credit Check / Leasing Issues

The 2014 A.I. indicates that “Potential renters may be asked to produce documentation regarding credit history, current and previous addresses and landlords, as well as employment history/salary. Qualifications criterion for tenant selection, if any, are usually not known to those seeking to rent. Although housing providers may set qualification guidelines that screen potential tenants, in many instances poor credit or rental history is used as a reason for denial as a way to exclude certain protected classes.”

Further, the 2014 A.I. indicates that “Standard leases or rental agreements include information regarding the monthly rental rate, required deposit, length of occupancy, community/house rules, and termination requirements. Most leases and rental agreements are standard for all units within the same community. The enforcement of the rules in the lease or rental agreement, however, may not be uniform for all tenants. Housing providers may choose strict enforcement of the rules for certain tenants based on discriminatory factors, such as familial status, race or disability, as well as arbitrary factors such as tattoos or body piercing. Since the recent escalation of housing prices throughout California,

complaints regarding tenant harassment through strict enforcement of lease agreements as a means of evicting tenants have increased. In a lucrative housing market, one potential impediment to Fair Housing is that some housing providers favor shorter lease terms like month-to-month leases. It allows the housing provider to forego a waiting period to increase rents and sometimes increasing rent is a way to push out tenants that they consider undesirable. Lastly, the security deposit can also serve as an impediment. To deter what a landlord perceives as less desirable tenants, the landlord may ask for a deposit higher than for others.”

**2019 Status:** Addressed. This issue illustrates the fine line between landlord-tenant issues and bona-fide fair housing discrimination. Over the last five years, FHCRC has encouraged rental property owners, managers, and realtors to provide written documentation to all applicants that includes the listings of all available housing, standard information on the terms and conditions of the application process, such as income qualifications, down payments, and other fees and expenses, posting Fair Housing informational signs and providing Fair Housing literature. These best practice recommendations serve to protect the interests of both the landlord and the tenant or prospective tenant.

FHCRC quarterly reports for the last five years indicate that over 93 percent of landlord-tenant clientele are in-place tenants. Further, FHCRC reports indicate that repairs and notices under existing leases are the leading case categories for landlord-tenant complaints.

### **Predatory Lending / Steering**

The 2014 A.I. indicates that “Predatory lending occurs when a variety of characteristics are present during the lending process or in the final mortgage loan itself. These characteristics include targeting specific groups for mortgage loans, unreasonable loan terms, and fraudulent behavior by the lender. Given the financial dangers associated with subprime loans, prepayments penalties, excessive fees, exaggerated incomes and abusively high rates, it is clear that discrimination found in the subprime market constitutes a grave threat to the financial well-being of America’s already underserved populations. The Department of Housing and Urban Development (HUD) has noticed that homeowners in high-income African-American neighborhoods are 6 times more likely to have a subprime loan compared to homeowners in a high-income Caucasian neighborhood. Product steering is another form of predatory lending that occurs when the borrower will be offered a variety of loan options, but they will be persuaded to take the higher cost loan. This was often seen when lenders steered potential borrowers towards FHA loans, even though they could have qualified for a conventional loan. There are benefits to an FHA loan but statistics have shown that even with these benefits, an FHA loan will cost the borrower more money over the life of a loan than a conventional loan would.”

Further, the 2014 A.I. indicates that “When Caucasian purchasers are discouraged from neighborhoods of color, while African American purchasers are steered toward those same neighborhoods, there is a clear violation of the Federal Fair Housing Act. Sometimes real estate agents steer by limiting the location of homes they show buyers. In other cases, real estate agents steer by making comments and editorializing about communities and neighborhoods.

**2019 Status:** Addressed. The 2019 A.I. analyzed the most recent available Home Mortgage Disclosure Act (HMDA) data for 2017 and found that the County and FHCRC have made great strides toward helping low-income and minority purchasers achieve a more level playing field in terms of lending outcomes. In 2017, not one low-income minority group had a loan approval rate (purchase, refinance or home improvement) that was disproportionately lower than non-Hispanic White applicants. Through its private and public grant funding sources, FHCRC provided extensive homebuyer education, credit counseling, and fair housing counseling and awareness training to the first-time home buyers and homeowners, particularly low-income and very low-income applicants. With respect to steering, there was insufficient publicly available data to support the charge that real estate agents in Riverside County are steering clientele into particular neighborhoods based on protected status. Additionally, HMDA data suggests that at least from a lending perspective, loan approval rates for home purchases were within 10 percentage points when comparing census tracts with high concentrations of minorities as well as for tracts with low concentrations of minorities. Similarly, family income levels for residents of census tracts where loan applicants were applying did not appear to impact lending decisions, as 71 percent of home purchase loans for properties located in low-income census tracts were approved, 77 percent of loans for middle-income tracts were approved, and 75 percent of loans for upper income census tracts were approved.

### **Habitability / Constructive Evictions**

The 2014 A.I. indicates that “The California Supreme Court has recognized that every residential lease carries with it an implied warranty of habitability. California Civil Code §1942 gives a tenant two options if the premises are uninhabitable: repair the problems and deduct the cost from the rent, or move out. This creates a situation where although the remedies of “repair and deduct” or “move out” are great on paper, yet in practice they are too risky for tenants to truly benefit from them. This creates an impediment to Fair Housing because tenants then come to accept the substandard living conditions as unavoidable. Low income families are often the most impacted by substandard living conditions, which makes the need to address this impediment to Fair Housing all the more important.”

Further, the 2014 A.I. indicates that “Another impediment to Fair Housing that is related to

habitability is the constructive eviction. A constructive eviction occurs when a landlord takes actions that interfere with the tenant's use and enjoyment of the premises in a significant way. Some of the tactics that landlords engage in that may result in a constructive eviction are cutting off the tenant's utilities or other essential services; harassing the tenant, whether verbally, physically, or emotionally; or blocking the tenant's access to the unit, such as changing the locks. Actions behind a constructive eviction are an attempt by the landlord to remove a lawful tenant without going through the proper unlawful detainer process." The 2014 A.I. included a recommendation to "Continue to develop, expand, and provide more education and outreach to housing providers, community organizations, and the general public regarding housing discrimination, fair housing laws, and services provided by the Fair Housing Council."

**2019 Status:** Removed. Upon review, there was insufficient publicly available data to support inclusion of this landlord-tenant issue as an impediment to fair housing choice.

### **Other Lending / Sales Concerns**

The 2014 A.I. indicates that "Other impediments to Fair Housing in the lending and sales market that do not involve predatory lending are differential treatment of minorities or low-income individuals in the lending process and real estate agents refusal to deal with transactions for properties valued less than \$100,000 or so. These are yet additional hurdles for low-income individuals and are impediments to Fair Housing that needs to be addressed." The 2014 A.I. recommended that the County contract with the Fair Housing Council of Riverside County, Inc., to conduct audit testing. Continue to develop, expand, and provide more education and outreach to housing providers, community organizations, and the general public requesting housing discrimination, fair housing laws, and services provided by the Fair Housing Council. Continue homebuyer education programs and ongoing education for participants in the first-time homebuyer program that the Fair Housing Council offers.

**2019 Status:** Addressed. The County supported the development and expansion of education and outreach to housing providers, community organizations, and the general public requesting housing discrimination, fair housing laws, and services provided by FHCRC. FHCRC provided 20 first-time homebuyer workshops during fiscal year 2017-18.

### **Discrimination against Persons with Disabilities**

Consistent with findings in the 2014 A.I., nearly 63 percent of the discrimination complaints in the County of Riverside over the last five years were on the basis of physical or mental disability. In total, there were 3,108 fair housing complaints surfaced through the work of the Fair Housing Council of Riverside County (FHCRC) over the last five years, with 1,586 or

51.03 percent of all discrimination cases reported on the basis of physical disability and with 370 or 11.90 percent of all discrimination cases reported on the basis of mental disability. These two case categories were the leading causes (first and second, respectively) of discrimination complaints in Riverside County according to FHCRC data. **Table I-1** illustrates the number of disability discrimination cases over the five-year period of study.

**Table I-1**  
**Fair Housing Discrimination Cases in Riverside County**

Basis	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	Total
Number of Disability Discrimination Cases (Physical and Mental)	309	524	402	285	436	1,956

Source: Fair Housing Council of Riverside County Quarterly Reports (2014-2018).

The high proportion of disability complaints to FHCRC is consistent with other communities in the area and is also consistent with data at the state and federal level. Fair housing discrimination on the basis of disability demonstrates a lack of understanding in the housing industry of the housing rights of persons with disabilities. Disabled persons are experiencing difficulties when requesting reasonable accommodations or modifications. In particular, persons with cognitive disabilities experience significantly more problems with these accommodations.

**2019 Status:** This impediment was addressed during the 2013-2018 planning period through education and outreach to housing providers through workshops, audits, information and referrals. However, given that nearly 63 percent of all fair housing complaints received by FHCRC over the last five years were on the basis of disability, this impediment has not been adequately addressed and remains a high priority in this A.I.

**Recommendations:** The County of Riverside and its contracted fair housing service provider should continue providing educational opportunities for property owners, property managers, and residents throughout the County to provide information concerning the law as it pertains to reasonable accommodations and reasonable modifications, which are some of the leading reasons why persons with disabilities encounter discrimination when seeking housing or attempting to maintain their housing. This could be addressed through workshops, public services announcements, literature distribution and through the provision of landlord-tenant mediation services to address potential discrimination before it occurs.

It is recommended that the County provide for, under contract, multiple workshops per year for the next five (5) years in locations throughout the County focused on the housing rights applicable to persons with physical disabilities and

persons with mental disabilities. The content of these workshops should be tailored to landlords, tenants and government officials (e.g., code enforcement, PHA staff, EDA staff), including a general introduction to fair housing laws and discrimination, and then primarily focus on forms of discrimination against persons with disabilities, such as unreasonably denying or refusing to address requests for reasonable accommodation and modification.

It is further recommended that the County continue contracting with a fair housing service provider for both discrimination and landlord-tenant services. Consultation with fair housing agencies indicates that offering free landlord-tenant services is the best way to identify more serious, but less often reported incidences of discrimination that leads to the types of large-scale pattern-and-practice cases that impact thousands of people each year and have the scale to warrant investigative and legal support from regulatory agencies.

**Responsible Entity:** County of Riverside.

**Timeframe:** Each year starting July 1, 2019 and ending June 30, 2024.

#### **D. New Impediments to Fair Housing Choice and Recommendations**

This 2019-2024 A.I. revealed the following new impediment and recommendations:

##### **Siting and Standards for Transitional and Supportive Housing**

Chapter 4 of this A.I. studies public policies to determine if impediments to fair housing choice exist that negatively affect the ability of members of protected classes to secure or maintain housing. Review of the 2017-2021 Housing Element of the General Plan and County Ordinance 348 governing land use planning and zoning in the County of Riverside revealed that transitional and supportive housing are not currently defined in the Ordinance and are not treated as a permitted use in residential zones.

**Recommendation:** Implement Action 1.5c of the Housing Element to revise Ordinance 348 to include a definition of transitional housing and supportive housing that is consistent with State of California Health and Safety Code Sections 50675.14 and 50675.2; and, revise the Ordinance to list transitional and supportive housing as permitted uses within residential zones.

**Responsible Entity:** According to Action 1.5c, the County of Riverside Transportation and Land Management Agency (TLMA) is responsible for implementing this recommendation.

**Timeframe:** No later than June 30, 2020

## A. Historical Profile

Riverside County is the fourth largest county in the state by population, stretching nearly 200 miles across and comprising over 7,200 square miles of fertile river valleys, low deserts, natural hot springs, soaring mountains, lush foothills, and rolling plains. Riverside County shares borders with Imperial, Orange, San Diego, and San Bernardino Counties, and extends from within 14 miles of the Pacific Ocean to the Colorado River border with Arizona.

Taking its name from the City of Riverside, the County was formed in 1893 from a small portion of San Bernardino County and a larger part of San Diego County.

Before the arrival of Europeans, Riverside County was home to many indigenous inhabitants, among them the Serranos, the Luiseños, the Cupeños, the Chemehuevi, and the Cahuillas, to employ the names given them by Spanish missionaries. Their own languages, some of which are considered extinct, are part of the Uto-Aztec family of languages, which includes both the Ute language of Utah and the Nahuan languages (also known as Aztec) of Mexico.

In 1798, Spanish Missionaries established *la Misión de San Luis Rey de Francia* (the Mission of Saint Louis, King of France) in northern San Diego County and designated the Indians living in the region "Sanluiseños," eventually shortened to "Luiseños." Members of the Pechanga Band of Luiseño believe their ancestors have lived in the Temecula area of Riverside County for more than 10,000 years. For the Pechanga, life on earth began in the Temecula Valley. Spanish settlers planted grapes in the favorable climate, and a thriving wine industry was born.

The Spanish and later Mexican governments rewarded retired *soldados de cuera*, or "leather jacket soldiers" who served in frontier garrisons of northern New Spain, with large land grants, known as *ranchos*, for the raising of cattle and sheep. Mexico gained independence from Spain in 1821, and subsequently, the Spanish missions were secularized, their Franciscan officials expelled. The Mexican governor of Alta California at the time, José Figueroa, was opposed to the Híjar-Padrés colonization plan put forth by the Mexican government, which called for the seizure of all mission lands for the benefit of Mexican settlers. Figueroa, himself, a *mestizo* of Spanish and Aztec ancestry, objected to the colonization plan and advocated for the restoration of at least half of the mission lands to the California natives. The Spanish Franciscan missionaries had, after all, administered the missions in trust for the original inhabitants. On August 4, 1834, Figueroa issued a 180-page proclamation setting out a plan for secularization of the missions, which was far more favorable to the native peoples than the Híjar-Padrés plan. The manifesto, published in Monterey in 1835, was the first book published in California. Figueroa's sudden death the same year while the first edition was in preparation ended the dispute.

The region would thereafter experience many violent clashes between non-native settlers

and the indigenous populations over the issue of land rights. Among these was the Temecula massacre, which took place in December 1846 east of present-day Temecula, and during which a combined force of California militia and Cahuilla Indians attacked and killed an estimated 33 to 40 Luiseño Indians. A treaty was negotiated between settlers and the native peoples in 1852, but the U.S. Senate failed to ratify it. The area's land grants were challenged before the California Land Commission in 1851 and the ruling appealed to the district court in 1856 to no avail. The Luiseño were eventually evicted.

Many of the communities that had grown up around the twenty-one California missions became secular *pueblos* (towns). Most of these places kept their previous mission names, by which we know them to this day, among them San Diego, San Juan Capistrano, San Fernando, San Gabriel, and Santa Barbara, to name but a few.

The first land grant in what is now Riverside County, Rancho Temescal, was a Mexican land grant in present-day Temescal Valley. Granted by Governor José María de Echeandía in 1828 to Leandro Serrano, the grant extended along the Temescal Valley south of present-day Corona and encompassed El Cerrito and Lee Lake. In 1838, Rancho Jurupa was awarded to Juan Bandini by Governor Juan B. Alvarado. Located along both banks of the Santa Ana River, the rancho included much of the land in the present day city of Jurupa Valley, as well as the downtown area of the City of Riverside. Other land grants within Riverside County would follow, among them, El Rincón in 1839, Rancho San Jacinto Viejo in 1842, Rancho San Jacinto y San Gorgonio in 1843, Ranchos La Laguna, Pauba, Temecula in 1844, Ranchos Little Temecula and Potrereros de San Juan Capistrano in 1845, Ranchos San Jacinto Sobrante, La Sierra (Sepúlveda), La Sierra (Yorba), Santa Rosa, and San Jacinto Nuevo y Potrero in 1846.

La Placita, originally La Placita de los Trujillos, is the earliest community established in Riverside County, California. The town was informally established soon after 1843 on the Santa Ana River, across from the town of Agua Mansa. La Placita and Agua Mansa were the first non-native settlements in the San Bernardino Valley. Together, they were referred to as "San Salvador," and were the largest settlements between New Mexico and Los Angeles in the 1840s. It is from these settlements that the city of Riverside evolved.

In 1848, with the signing of the Treaty of Guadalupe Hidalgo with Mexico, California became United States territory, and in 1850, California earned statehood. This event precipitated an influx of settlers into the region, among them seekers of health and wealth and personal freedoms, who included gold miners, entrepreneurs, speculators, politicians, adventurers, the ill and infirm, religious refugees, and utopian idealists.

A stagecoach line started a local route from Warner Ranch to Colton in 1857 that passed through Temecula Valley. Within a year, the Butterfield Overland Mail stagecoach line, with a route between St. Louis, Missouri and San Francisco, stopped at Temecula's Magee Store. On April 22, 1859, the first inland Southern California post office was established in Temecula in the Magee Store and the city was incorporated. This was the second post office

in the state, the first being located in San Francisco.

On May 9, 1893, voters approved the formation of Riverside County. The County's seat is the city of Riverside, named for its location on the Santa Ana River. The city is a university town, home to the University of California, Riverside, one of ten University of California campuses.

Riverside is also the birthplace of the citrus industry in California. One of three original orange trees from Bahia, Brazil, given in 1874 to Eliza Tibbets by William Saunders, a friend and horticulturist at the United States Department of Agriculture, still stands to this day inside a protective fence at one of the city's major intersections. The city's own unique California Gold Rush is commemorated in its California Citrus State Historic Park and in the restored packing houses of its downtown Marketplace district. By 1882, there were more than half a million citrus trees in California, almost half of which were in Riverside. Refrigerated railroad cars and innovative irrigation systems established Riverside as the richest city in the United States in terms of per capita income by 1895.

Downtown Riverside's historic Mission Inn, formerly the Glenwood Tavern, is the largest Mission Revival style building in the U.S. It has seen visits by sitting presidents since Benjamin Harrison in 1891. Other visitors included Theodore Roosevelt in 1903, William Howard Taft in 1909, Herbert Hoover in the 1920's and after leaving the White House, John F. Kennedy in 1940, Gerald Ford in 1998, and George W. Bush in 1999 and 2003. The Inn also hosted the nuptials of Richard and Pat Nixon in 1940, and the honeymoon of Ronald and Nancy Reagan in 1952.

Postcards of lush orange groves, swimming pools and magnificent homes have attracted vacationers and entrepreneurs to Riverside throughout the years. Many relocated to the warm, dry climate for reasons of health and to escape Eastern winters. The first golf course and polo field in southern California were built in Riverside. In addition to the draw of Riverside itself, the resort cities of Palm Springs, Palm Desert, Indian Wells, La Quinta, Rancho Mirage, and Desert Hot Springs, located in the Coachella Valley region of central Riverside County, became world-renowned havens for the elite of the burgeoning Hollywood film industry in the twentieth century. Film stars Bob Hope and Dinah Shore brought together the worlds of Hollywood celebrity and professional golf with the popular Bob Hope Desert Classic golf tournament and the Colgate Dinah Shore Winner's Circle, the latter serving to shine a spotlight on the emerging Ladies Professional Golf Association, or LPGA. These resort communities have hosted U.S. Presidents from Dwight Eisenhower, who owned a vacation home in Palm Springs, to Barack Obama, who enjoyed multiple visits and many rounds of golf.

The County is home to Joshua Tree National Park, which straddles Riverside and San Bernardino Counties, north of Palm Springs, Skull Rock Historical Landmark in Twentynine Palms, and Box Spring Mountain Reserve Park in Moreno Valley.

The County is also the location of the March Air Reserve Base, one of the oldest airfields continuously operated by the United States military. Established as the Alessandro Flying Training Field in February 1918, it was one of 32 U.S. Army Air Service training camps established after the United States' entry into World War I in April 1917.

Riverside County has also been at the forefront of the modern Native American Gaming movement. In response to the County government's attempts to shutter their small bingo hall operations in the early 1980s, the Morongo Band of Cahuilla Mission Indians and the Cabazon Band of Mission Indians joined forces. Their legal battle with the County resulted in a favorable ruling in the U.S. Supreme Court on February 25, 1987. Congress then enacted the Indian Gaming Regulatory Act in 1988 to codify the relationship between Indian gaming and state governments. Consequently, both tribes now operate large casinos in the County: the Morongo Casino, Resort & Spa in Cabazon, and the Fantasy Springs Resort Casino in Indio, adjacent to Spotlight 29 Casino in Coachella. The Pechanga Resort & Casino in Temecula is currently one of the top ten employers in the County, with 4,000 employees.

This Analysis of Impediments presents a demographic profile of the County of Riverside. It evaluates the level of housing needs of specific groups, and assesses the availability of a range of housing choices for its residents. The report also contains an analysis of the public and private sectors that examines factors limiting the availability of a range of housing choices, as well as conditions that may hinder a person's fair access to housing. Employment, transportation, and the provision of municipal services all play vital roles in terms of housing choice. In its conclusion, the report provides a practical guide with recommendations as to how to improve fair housing opportunities.

## **B. Demographic Profile**

According to the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation, "The Affirmatively Furthering Fair Housing (AFFH) rule created a standardized process for fair housing planning that program participants use to help meet their longstanding requirement to affirmatively further fair housing. As part of this process, program participants analyze data and other information to assess fair housing issues in their jurisdictions and regions." Data provided by HUD for this demographic profile includes Decennial Census data from 1990, 2000, 2010, data from the Brown Longitudinal Tract Database (LTDB) based on decennial census data, as well as American Community Survey (ACS) 5-year estimates. These data were evaluated, along with local data and local knowledge, to prepare this A.I.

### *Population Trends*

**Tables II-1, II-2, II-3 and II-4** below present demographic information and demographic trends both for the jurisdiction and the region. In terms of population growth from the

period between 1990 and the current census, the County of Riverside far outpaces the region. While the region saw significant population growth of 63.2 percent within the period, with the number of area residents rising from nearly 2.6 million to over 4.2 million, the jurisdiction saw explosive growth of 87.05 percent within the same period, from a population of 1,170,628 in 1990 to 2,189,641 residents in 2010. The latest ACS 5-year estimates (2013-2017), show an even greater population surge of 101.2 percent within the County to an estimated 2,355,002 residents.

### *Age and Sex Characteristics*

The County's largest demographic group, residents between 18 and 64 years, grew 91.92 percent since 1990, slightly outpacing the overall population growth rate of 87.05 percent over the period between censuses. While the population of children under age 18 kept pace, with 85.96 percent growth within the same period, the senior population grew at a far slower rate of just over 68 percent. However, seniors in the jurisdiction still outpaced the average regional population growth of 63 percent for their group.

Factoring in 2017 estimates, the largest demographic grew even more demonstrably, with an increase of over 108 percent among 18 to 64 year olds. Seniors kept pace with nearly 106 percent growth, while children under 18 posted the slowest growth rate, at 84 percent.

As percentages of the overall population, the largest demographic, 18 to 64 year-olds, grew in both the jurisdiction and the region, 1.51 and 1.38 percentage points respectively, while the relative populations of children under 18 years and of seniors over age 64 both decreased. Seniors within the jurisdiction decreased in number by the largest overall proportional share, from 13.15 percent of the overall population in 1990 to 11.81 percent in 2010. However, current ACS estimates place the senior population at 13.46 percent of the total, more closely in keeping with 1990 levels. These estimates also place the largest demographic, 18-64 year-olds, at 60.48 percent, 2.12 percentage points higher than 1990 levels. By these recent estimates, the population that is decreasing most sharply within the jurisdiction is children under 18, at 26.06 percent of the total, down from a high of 31.01 percent in 2000 and below the 28.75 percent of this group's population within the region.

In terms of sex, females have historically slightly outnumbered males within the jurisdiction. That trend has continued during the period under review, as women edged out men 50.20 percent to 49.80 percent as of the 2010 census, up slightly from 50.08 percent to 49.92 percent in 1990. Current ACS estimates put the gender gap as consistent with the latest census. This is in keeping with a regional trend that has seen a rise in the female population from 50 percent in 1990 to 50.27 percent in 2010.

### *Household Profile*

Information on household characteristics assists cities and housing providers in understanding

and meeting changing housing needs. The Bureau of the Census defines a household as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, and unrelated individuals living together. Persons living in retirement or convalescent homes, dormitories, or other group living situations are not considered households for the purposes of the data.

**Table II-1** below compares various household trends in Riverside County. Reflective of the age distribution within the County, families of all types continue to make up the vast share of the County’s population, varying only slightly from 73.6 percent in 2000, to 74.4 percent in 2010, to current estimates of 73.4 percent. As a percentage of overall households, married families with children have been supplanted by married families without children as the largest statistical group, with current estimates as high as 29.82 percent of total households within the County. Perhaps the most significant change since 2000 was the percent increase in the number of “Other Family” households (58.13 percent change), followed closely by married families without children (50.71 percent change). Other Family households consist of a parent of either sex maintaining a household with no spouse present. Interestingly, 2017 ACS data identify the vast majority, 93,976, or 68.64 percent, of these “Other Families,” as “Female householder, no husband present, family household” (S1101). Therefore, single mother households are an emerging demographic within the jurisdiction.

**Table II-1  
Households by Household Type**

Household Type	2000		2010		2016		Percent Change
	Number	Percent	Number	Percent	Number	Percent	
<b>Family Households</b>							
- Married With Children	145,009	28.6%	185,194	27.0%	173,225	24.34%	19.46%
- Married Without Children	140,799	27.9%	191,187	27.8%	212,202	29.82%	50.71%
- Other Families	86,578	17.1%	133,860	19.6%	136,905	19.24%	58.13%
<b>Non-Family Households</b>							
- Non-families <sup>1</sup>	133,832	26.4%	176,019	25.6%	189,392	26.60%	41.51%
<b>Total</b>	<b>506,218</b>	<b>100%</b>	<b>686,260</b>	<b>100%</b>	<b>711,724</b>	<b>100%</b>	<b>40.60%</b>
<b>Average Household Size</b>	<b>2.98</b>		<b>3.14</b>		<b>3.26</b>		<b>9.40%</b>

Source: U.S. Census 2000 & 2010, 2013-2017 ACS Five-year Estimates, S1101.

<sup>1</sup> Total of Non-families includes Single Persons.

The last decennial census reports that among the region’s families, the percentage with children is 50.99 percent (**Table II-3**). **Table II-4** shows that the percentage of families with children within the jurisdiction is similar to that of the region, at 50.38 percent. Although this percentage has remained fairly constant, there has nonetheless been a surge in absolute numbers of families with children in Riverside, from a low of 142,954 households in 2000, to 257,077 as of 2010, which represents a 79.83 percent increase. Since 1990, households with children have consistently made up half or more of family households overall within both the jurisdiction and the region.

**Table II-2  
Demographics of County of Riverside**

<b>Race/Ethnicity</b>		<b>#</b>	<b>%</b>
White, Non-Hispanic		869,068	39.69%
Black, Non-Hispanic		130,823	5.97%
Hispanic		995,257	45.45%
Asian or Pacific Islander, Non-Hispanic		131,770	6.02%
Native American, Non-Hispanic		10,931	0.50%
Two or More Races, Non-Hispanic		48,110	2.20%
Other, Non-Hispanic		3,682	0.17%
<b>National Origin</b>			
#1 country of origin	Mexico	298,459	14.44%
#2 country of origin	Philippines	33,760	1.63%
#3 country of origin	El Salvador	13,768	0.67%
#4 country of origin	Guatemala	10,577	0.51%
#5 country of origin	Vietnam	10,163	0.49%
<b>Limited English Proficiency (LEP) Language</b>			
#1 LEP Language	Spanish	271,452	13.13%
#2 LEP Language	Tagalog	9,388	0.39%
#3 LEP Language	Chinese	8,042	0.45%
#4 LEP Language	Vietnamese	6,237	0.30%
#5 LEP Language	Korean	5,631	0.27%
<b>Disability Type</b>			
Hearing difficulty		68,771	3.37%
Vision difficulty		43,074	2.11%
Cognitive difficulty		84,592	4.14%
Ambulatory difficulty		125,258	6.13%
Self-care difficulty		52,506	2.57%
Independent living difficulty		87,032	4.26%
<b>Sex</b>			
Male		1,089,576	49.76%
Female		1,100,065	50.24%
<b>Age</b>			
Under 18		620,108	28.32%
18-64		1,310,947	59.87%
65+		258,586	11.81%
<b>Family Type</b>			
Families with children		257,077	50.38%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

**Table II-3  
Demographics of Riverside-San Bernardino-Ontario, CA (Region)**

<b>Race/Ethnicity</b>		<b>#</b>	<b>%</b>
White, Non-Hispanic		1,546,666	36.61%
Black, Non-Hispanic		301,523	7.14%
Hispanic		1,996,402	47.25%
Asian or Pacific Islander, Non-Hispanic		261,593	6.19%
Native American, Non-Hispanic		19,454	0.46%
Two or More Races, Non-Hispanic		91,476	2.17%
Other, Non-Hispanic		7,737	0.18%
<b>National Origin</b>			
#1 country of origin	Mexico	553,493	13.95%
#2 country of origin	Philippines	62,019	1.56%
#3 country of origin	El Salvador	30,455	0.77%
#4 country of origin	Guatemala	19,549	0.49%
#5 country of origin	Vietnam	19,525	0.49%
<b>Limited English Proficiency (LEP) Language</b>			
#1 LEP Language	Spanish	533,544	13.45%
#2 LEP Language	Chinese	20,495	0.52%
#3 LEP Language	Tagalog	16,986	0.43%
#4 LEP Language	Vietnamese	12,570	0.32%
#5 LEP Language	Korean	11,883	0.30%
<b>Disability Type</b>			
Hearing difficulty		125,033	3.20%
Vision difficulty		86,934	2.23%
Cognitive difficulty		170,114	4.36%
Ambulatory difficulty		241,262	6.18%
Self-care difficulty		102,841	2.63%
Independent living difficulty		170,490	4.37%
<b>Sex</b>			
Male		2,101,083	49.73%
Female		2,123,768	50.27%
<b>Age</b>			
Under 18		1,214,696	28.75%
18-64		2,570,221	60.84%
65+		439,934	10.41%
<b>Family Type</b>			
Families with children		500,062	50.99%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

**Table II-4  
Demographic Trends of Riverside**

Race/Ethnicity	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	753,905	64.40%	788,702	51.03%	869,068	39.69%	861,271	36.60%
Black, Non-Hispanic	59,750	5.10%	101,329	6.56%	148,460	6.78%	140,810	6.00%
Hispanic	307,284	26.25%	559,444	36.20%	995,257	45.45%	1,130,033	48.00%
Asian or Pacific Islander, Non-Hispanic	38,127	3.26%	69,138	4.47%	152,592	6.97%	149,881	6.40%
Native American, Non-Hispanic	8,175	0.70%	17,412	1.13%	19,309	0.88%	9,584	0.40%
<b>National Origin</b>								
Foreign-born	173,769	14.85%	293,714	19.01%	471,927	21.55%	487,210	22.25%
<b>LEP</b>								
Limited English Proficiency	122,105	10.43%	221,995	14.37%	327,427	14.95%	324,495	14.82%
<b>Sex</b>								
Male	584,222	49.92%	768,093	49.70%	1,089,576	49.80%	1,171,711	49.80%
Female	586,191	50.08%	777,294	50.30%	1,100,065	50.20%	1,183,291	50.20%
<b>Age</b>								
Under 18	333,468	28.49%	479,261	31.01%	620,108	28.32%	613,721	26.10%
18-64	683,055	58.36%	871,293	56.38%	1,310,947	59.87%	1,424,302	60.40%
65+	153,890	13.15%	194,833	12.61%	258,586	11.81%	316,979	13.50%
<b>Family Type</b>								
Families with children	150,415	50.39%	142,954	53.74%	257,077	50.38%	232,869	44.75%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

Note 4: Current Jurisdictional Data from 2013-2017 ACS, DP05, Margin of error +/-0.1%.

Note 5: Current Family Type data calculated from ACS 2017 1-Year Estimate, S0201, Margins of error +/-0.7% - 0.8%.

**Table II-5  
Demographic Trends of Riverside-San Bernardino-Ontario, CA (Region)**

Race/Ethnicity	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	1,615,830	62.41%	1,540,776	47.33%	1,546,666	36.61%	1,546,666	36.61%
Black, Non-Hispanic	168,731	6.52%	263,322	8.09%	336,944	7.98%	301,523	7.14%
Hispanic	685,672	26.48%	1,228,683	37.75%	1,996,402	47.25%	1,996,402	47.25%
Asian or Pacific Islander, Non-Hispanic	93,331	3.60%	164,035	5.04%	298,585	7.07%	261,593	6.19%
Native American, Non-Hispanic	18,007	0.70%	36,061	1.11%	36,077	0.85%	19,454	0.46%
<b>National Origin</b>								
Foreign-born	360,666	13.93%	612,354	18.81%	904,558	21.41%	920,860	21.80%
<b>LEP</b>								
Limited English Proficiency	252,012	9.73%	462,538	14.21%	660,791	15.64%	640,802	15.17%
<b>Sex</b>								
Male	1,294,274	50.00%	1,618,466	49.73%	2,101,083	49.73%	2,101,083	49.73%
Female	1,294,518	50.00%	1,636,316	50.27%	2,123,768	50.27%	2,123,768	50.27%
<b>Age</b>								
Under 18	771,845	29.81%	1,044,686	32.10%	1,214,696	28.75%	1,214,696	28.75%
18-64	1,539,215	59.46%	1,869,817	57.45%	2,570,221	60.84%	2,570,221	60.84%
65+	277,732	10.73%	340,280	10.45%	439,934	10.41%	439,934	10.41%
<b>Family Type</b>								
Families with children	350,701	53.60%	266,840	54.97%	500,062	50.99%	500,062	50.99%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except for family type, which is out of total families.

Note 2: Data Sources: Decennial Census, ACS.

Note 3: Refer to the Data Documentation for details (<http://www.hudexchangeinfo/resource/4848/affh-data-documentation>).

Note 4: Current Jurisdictional Data from 2013-2017 ACS, DP05, Margin of error +/-0.1%.

Note 5: Current Family Type data calculated from ACS 2017 1-Year Estimate, S0201, Margins of error +/-0.7% - 0.8%.

### *Race and Ethnicity*

Among other protected characteristics and classes of individuals, the Fair Housing Act prohibits housing discrimination based on race. While HUD provides data on both race and ethnicity, Hispanics of any race are considered for its purposes as a separate race/ethnic category that “can experience housing discrimination differently than other groups.” Therefore, people who identify their ethnicity as Hispanic are excluded from the data provided for the other race groups – Black, Asian and Pacific Islander, Native American, and Other.

A number of generalizations can be made, based upon evaluation of the demographics and demographic trends presented in the tables above. First, the jurisdiction is more White than the region at large. Riverside County's population was 39.69 percent White as of the 2010 census, and is currently 36.60 percent White by latest ACS 5-year estimates. This percentage coincides with the region's 36.61 percent of residents who identify as White. Second, the jurisdiction was less Hispanic than the region at large (45.45 percent vs. 47.25 percent) as of the last census, but surpasses the region by current estimates, at 48 percent. Third, the jurisdiction was slightly less Black than the region (6.78 percent vs. 7.98 percent), with current estimates down to 6.00 percent.

Hispanics outnumber Whites within the jurisdiction, as they do within the region. In terms of growth, the White population within the jurisdiction has followed the negative growth trend of the region, from a high of 64.40 percent of the population in 1990, to 39.69 percent as of the 2010 census. While the White population within the region has actually decreased by 4.28 percent since 1990, with a slight uptick between the 2000 and 2010 censuses, the jurisdiction saw its White population continue to grow in absolute terms through 2010, increasing by 15 percent. However, latest estimates show a decrease in absolute numbers for this group, from a high of 869,068 to an estimated 861,271 currently. Percentages of Whites within the population have declined steadily for both the jurisdiction and the region, from highs of 64.40 percent and 62.41 percent respectively, to current estimates of 36.60 percent and 36.61 percent respectively.

Meanwhile, Non-White populations have experienced astronomic growth within the County during the period. This growth includes a nearly 224 percent population increase among Hispanics in the jurisdiction as of the 2010 census, compared to a 191 percent increase among Hispanics within the region as a whole. That growth rate rises to 268 percent when factoring in current estimates. Similarly, Black populations grew by over 148 percent within the jurisdiction, and by nearly 100 percent within the region. The County's Asian and Pacific Islander population, meanwhile, surged 300 percent within the period from 1990 to 2010, while the same group's numbers within the region climbed nearly 220 percent. The Native American population in the jurisdiction more than doubled in size, growing fully 136 percent, while in the region it posted growth of 100 percent. Current estimates, however, place the numbers significantly lower, at only 8.04 percent higher than 1990 levels.

It is important to note that current ACS 5-year estimates show that only one group continues to increase in real numbers within the jurisdiction. Whereas Whites, Blacks, Asians and Pacific Islanders, and Native Americans have all seen their populations decrease in absolute terms since the last decennial census, the Hispanic population continues its growth trend, with current numbers estimated at 1,130,033.

*Foreign Born Population and Limited English Proficiency*

In terms of national origin, the largest foreign-born population within the jurisdiction and the region is from Mexico, at 14.44 percent of County residents, compared to 13.95% of the region's residents. After Mexico, the greatest numbers of foreign-born residents of both the County and the region hail from the Philippines, El Salvador, Guatemala and Vietnam. The remaining five most populous non-native groups in the County hail from India, Korea, China (excluding Hong Kong and Taiwan), Canada, and Vietnam, whereas, the region's next most populous non-native groups are from Korea, India, Canada, China and Taiwan.

These foreign-born nationals include residents who have less than a fluent mastery of the English language, and therefore need accommodation. Riverside residents with Limited English Proficiency (LEP) have significantly increased in number both in real terms and as a proportion of the overall population, from 122,105 residents in 1990, or 10.43% of the total, to current estimates of 324,495, or 14.82% of total County residents. This represents a 166% increase since 1990. Regionally, their proportionate share increased even more dramatically, from 9.73% of the population in 1990 to 15.17% by current estimates. In absolute terms, the numbers of limited English speakers regionally increased 155%.

*Racial Integration*

As stated in the AFFH-T Data Documentation, HUD has developed a series of indices to help inform communities about segregation and disparities in access to opportunity in their jurisdiction and region. These indices are as follows:

1. Dissimilarity Index;
2. Low Poverty Index;
3. School Proficiency Index;
4. Jobs Proximity Index;
5. Labor Market Engagement Index;
6. Low Transportation Cost Index;
7. Transit Trips Index; and
8. Environmental Health Index.

Analysis of these indices shows that with the exception of their ability to access a low transportation costs and proximity to jobs (**Table II-12**, Section D below), residents of the County of Riverside enjoy relative access to opportunity at levels en par with or slightly higher than residents of the region generally. Higher index scores nearly across the board indicate greater access for Riverside residents to opportunity in the important areas of education and employment, and lower exposure to poverty. Further, these scores are consistent across various protected groups, meaning that members of most racial and ethnic groups enjoy a better standard of living by various measures than their counterparts within the greater statistical region.

*Dissimilarity Index*

According to HUD, “The dissimilarity index (or the index of dissimilarity) is a commonly used measure of community-level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. The values of the dissimilarity index range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question, and a value of 100 representing perfect segregation between the racial groups.” (AFFH - T)

As is the case with five of the remaining seven indices presented in **Table II-12** (Section D, below), the County of Riverside’s Racial/Ethnic Dissimilarity Index shown below in **Table II-6** compares favorably to the region in terms of absolute values, meaning that Riverside County is more integrated than the region overall with respect to each of the four groups compared in **Table II-6**.

However, an examination of overall trends reveals a different picture. While the County saw racial segregation in the Black community decline 13.12 percent as of the 2010 census, current estimates show the County trending toward more, not less, segregation within the Black community and across the board. In every category, the County is trending in the direction of more, not less, segregation at a rate that is in keeping with than that of the region overall. With respect to Non-Whites, the level of segregation from Whites, as measured by the Dissimilarity Index, has increased 22.92 percent within the County since 1990. This is slightly less than the regional increase of 25.4 percent during the same period. With the exception of the Black community, in which segregation has ticked up in recent years, but is still statistically declining, this upward trend holds true for the other ethnic/racial groups within the County, as well as for their regional counterparts. Hispanics have become increasingly segregated by a factor of 24.12 percent within the County and 23.59 percent within the region. Asians and Pacific Islanders are faring somewhat better within the County, with their segregation levels increasing by 16.84 percent, compared to 29.85 percent within the region.

The relative degree of segregation within the County as respects these particular communities is shown in **Map II-1** below, wherein concentrations of colored dots represent various races/ethnic groups, with orange dots representing Whites. Each dot represents 50 people. The map reveals high concentrations of orange dots in the Northwest region of the County, especially along the California State Route 91 corridor, beginning near the intersection with California State Route 71 in Corona, and continuing through the Norco area and into the City of Riverside. Other concentrations of White residents, as indicated by orange dots, are found along the Interstate 15 corridor, through the communities of Lake Elsinore, Wildomar, Murrieta, and Temecula. Still other concentrations of White residents are found farther East, in Hemet, as well as in the Coachella Valley communities of Palm Springs, Cathedral City, Rancho Mirage, Palm Desert, Indian Wells, and La Quinta.

Concentrations of Hispanics, represented by blue dots are found in the extreme Northwest of the County in the communities of Mira Loma, Glen Avon, and Rubidoux. Another heavily Hispanic area is found more inland, radiating out from the Perris area, which also has concentrations of Blacks, represented by dark green dots. Still another heavily Hispanic area begins in Indio and stretches southeastward toward the Salton Sea.

**Table II-6  
Racial/Ethnic Dissimilarity Trends**

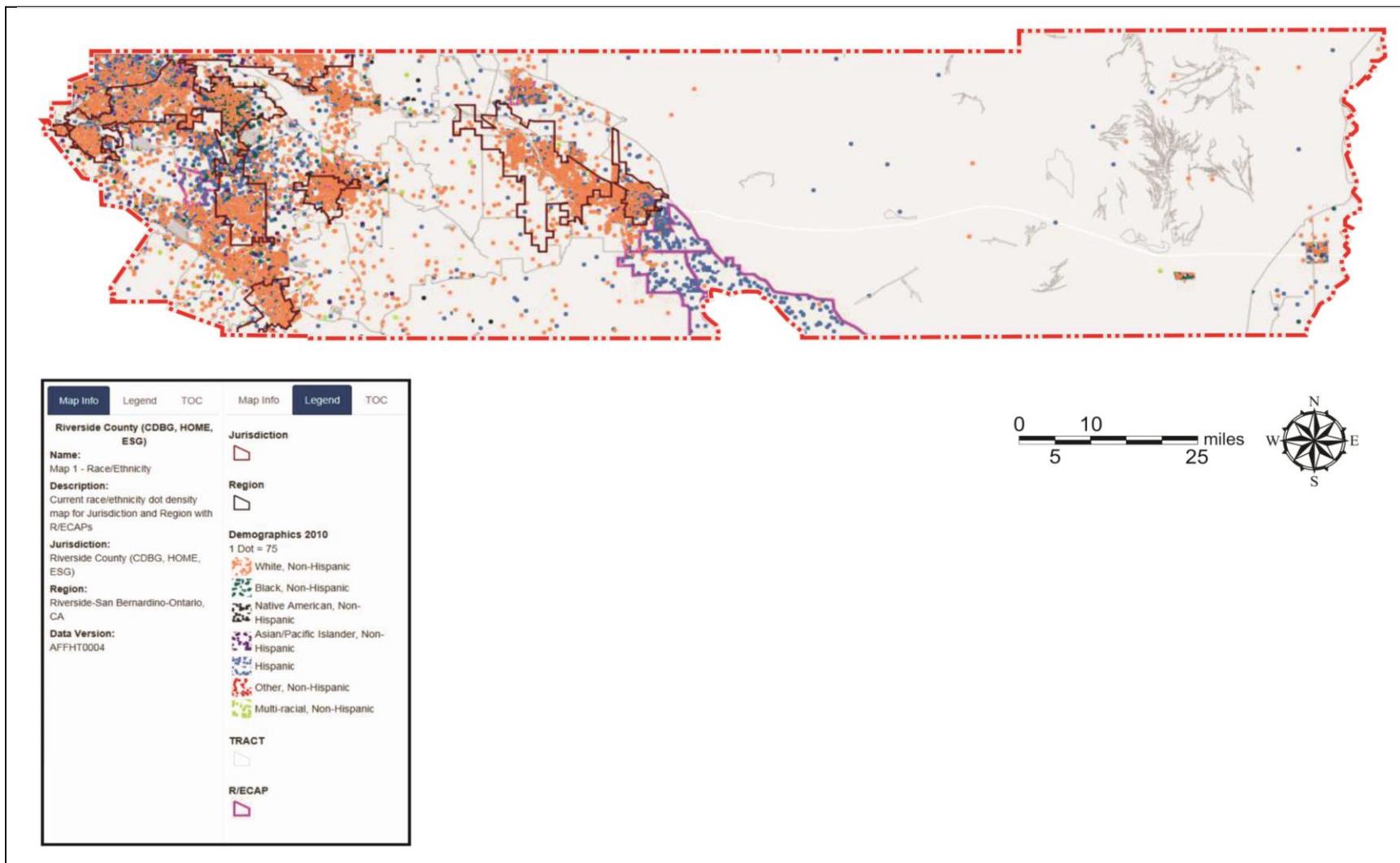
Racial/Ethnic Dissimilarity Index	County of Riverside				(Riverside-San Bernardino-Ontario, CA) Region			
	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	32.16	38.18	36.71	39.53	32.92	38.90	38.95	41.29
Black/White	46.72	47.08	40.59	44.89	43.74	45.48	43.96	47.66
Hispanic/White	34.33	41.31	40.66	42.61	35.57	42.40	42.36	43.96
Asian or Pacific Islander/White	34.92	35.99	36.36	40.80	33.17	37.31	38.31	43.07

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

Map II-1  
Race / Ethnicity



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

**C. Income Profile**

In evaluating household income, households are grouped in relation to the County Median Family Income (MFI) and adjusted for household size. This grouping provides a useful basis of comparison between Riverside and the region and also corresponds with terminology used in the County’s low-income housing programs. To facilitate discussion of 2013-2017 5-Year ACS data, the 2018 HUD MFI limits for the Riverside-San Bernardino-Ontario Metropolitan Statistical Area are shown below in **Table II-7**. The categories include:

- Extremely Low Income (0-30 percent of County MFI);
- Low Income (31-50 percent of County MFI);
- Moderate Income (51-80 percent of County MFI);
- Middle/Upper Income (>81 percent of County MFI);
- Upper Income (>120 percent of County MFI).

**Table II-7  
HUD Median Family Income Limits<sup>1</sup>**

Household Size / MFI %	1	2	3	4
0-30%	\$14,150	\$16,460	\$20,780	\$25,100
31-50%	\$23,600	\$27,000	\$30,350	\$33,700
51-80%	\$37,750	\$43,150	\$48,550	\$53,900
81-100%	\$46,100	\$52,650	\$59,250	\$65,800
101-120%	\$55,300	\$63,200	\$71,100	\$79,000

Source: U.S. Department of Housing and Urban Development, 2018.

Note 1: FY 2018 Income Limits presented for Riverside-San Bernardino-Ontario Metropolitan Area only.

*Income of Households*

The data in **Table II-8** on the following page indicates that the average household income in Riverside is \$80,056 per year, with the median income of \$60,807. Nearly 60 percent of all Riverside households earn more than \$50,000 per year and nearly 30 percent of households are considered upper income households that earn more than \$100,000 per year.

Family households (defined by the Census Bureau for data purposes to mean two or more individuals who are related by birth, marriage, or adoption, although they also may include other unrelated people) generally earned better incomes than nonfamily households. Married-couple family households earned the highest incomes among household types with 72.3 percent earning more than \$50,000 per year and 38.3 percent earning more than \$100,000 per year. Nonfamily households (defined by the Census Bureau for data purposes to mean people who live alone or who share their residence with unrelated individuals) earned a

median income of \$39,438, with only 41.6 percent earning more than \$50,000 per year and only 10.4 percent earning more than \$100,000 per year.

**Table II-8  
Number of Households by Income Level**

	All Households		Families Only		Married-Couple Families Only		Nonfamily Households Only	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
<b>Total</b>	711,724	+/-2,199	522,332	+/-2,932	385,427	+/-3,217	189,392	+/-2,425
<b>Less than \$10,000</b>	5.60%	+/-0.2	4.10%	+/-0.2	2.00%	+/-0.1	12.10%	+/-0.5
<b>\$10,000 to \$14,999</b>	4.50%	+/-0.2	2.80%	+/-0.2	1.70%	+/-0.1	10.10%	+/-0.5
<b>\$15,000 to \$24,999</b>	9.40%	+/-0.3	7.50%	+/-0.3	5.30%	+/-0.3	15.80%	+/-0.6
<b>\$25,000 to \$34,999</b>	9.40%	+/-0.2	8.60%	+/-0.2	7.00%	+/-0.2	12.50%	+/-0.6
<b>\$35,000 to \$49,999</b>	12.80%	+/-0.2	12.60%	+/-0.3	11.50%	+/-0.3	13.30%	+/-0.6
<b>\$50,000 to \$74,999</b>	17.80%	+/-0.3	18.50%	+/-0.3	18.70%	+/-0.4	15.30%	+/-0.5
<b>\$75,000 to \$99,999</b>	13.00%	+/-0.3	14.10%	+/-0.3	15.30%	+/-0.3	8.80%	+/-0.4
<b>\$100,000 to \$149,999</b>	15.60%	+/-0.3	17.70%	+/-0.4	20.80%	+/-0.5	7.70%	+/-0.5
<b>\$150,000 to \$199,999</b>	6.50%	+/-0.2	7.90%	+/-0.3	9.70%	+/-0.4	2.20%	+/-0.2
<b>\$200,000 or more</b>	5.30%	+/-0.1	6.20%	+/-0.2	7.80%	+/-0.2	2.20%	+/-0.2
<b>Median income</b>	60,807	+/-429	68,846	+/-741	80,552	+/-743	34,420	+/-696
<b>Mean income</b>	80,056	+/-589	88,092	+/-751	100,313	+/-843	51,581	+/-863

Source: U.S. Census Bureau, S1901, 2013-2017 American Community Survey 5-Year Estimates.

*Cost Burden*

A direct means by which HUD measures income in relation to housing vulnerability is the degree to which households experience cost burden, defined as the expenditure of more than 30 percent of total gross household income on housing costs, and severe cost burden, defined as the expenditure of more than 50 percent of total gross household income on housing costs. Housing costs for renters include rent paid by the tenant plus utilities; for owners, housing costs include mortgage payment, taxes, insurance, and utilities.

**Table II-9  
Demographics of Households with Severe Housing Cost Burden**

	Riverside County			(Riverside-San Bernardino-Ontario, CA) Region		
Households by Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	65,420	354,965	18.43%	109,075	615,660	17.72%
Black, Non-Hispanic	12,500	42,287	29.56%	28,670	96,380	29.75%
Hispanic	55,930	233,431	23.96%	112,350	469,370	23.94%
Asian or Pacific Islander, Non-Hispanic	8,370	36,807	22.74%	16,065	75,739	21.21%
Native American, Non-Hispanic	755	3,380	22.34%	1,145	5,864	19.53%
Other, Non-Hispanic	3,160	12,205	25.89%	5,605	24,015	23.34%
Total	146,135	683,145	21.39%	272,910	1,287,025	21.20%
Households by Household Type and Size	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
Family households, <5 people	73,835	375,275	19.67%	140,335	715,300	19.62%
Family households, 5+ people	24,125	129,419	18.64%	46,785	249,069	18.78%
Non-family households	48,185	178,440	27.00%	85,810	322,655	26.59%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # of households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Sources: CHAS, 2008-2012.

Note 5: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

**Table II-9** above compares the degree to which residents within the jurisdiction experience severe cost burden to the level at which the region's residents experience the same issue. Data are broken down by race/ethnic group and by household type/size.

Among the County of Riverside's 683,145 total households, 146,135, or 21.39 percent, are severely cost burdened. This is within one percentage point of the region's 21.20 percent of households experiencing severe cost burden. The data also show that Blacks, Hispanics and Asians, as individual groups, are all more susceptible to cost burden within the County of

Riverside than the population in general. Hispanics within the County of Riverside also experience severe cost burden at a similar rate to that of their counterparts in the region, 23.96 percent vs. 23.94 percent. For the jurisdiction's Asian or Pacific Islander residents, the difference increases slightly, with 22.74 percent of these County residents experiencing severe cost burden as compared to 21.21 percent within the region as a whole. Black households within the jurisdiction experience severe cost burden in 29.56 percent of cases, lower than the regional percentage of 29.75 percent, but still higher than the baseline rate of 21.39 percent for the jurisdiction.

Both large and small family households experience severe cost burden within the County at rates en par with or slightly under that of the region, and somewhat less than non-family households.

*Geography and Income: Low and Moderate Income*

The definition of an area of concentration for low and moderate-income households is governed by federal regulations for the Community Development Block Grant (CDBG) Program. A low and moderate-income area is defined as a block group or census tract with 51 percent or more residents earning income less than 80 percent of the County median family income. Among the special tabulations of Census Bureau data that HUD uses for its CDBG Program is the Low and Moderate Income Summary Data (LMISD). The latest iteration of this data from 2011-2015 ACS shows 914,489 low- and moderate-income residents in Riverside County against a population of 2,264,280. This yields a low- and moderate-income percentage of 40.39 percent Countywide. In other words, 40.39 percent of people living in Riverside County are members of families earning less than 80 percent of Area Median Income. Though significant, this percentage compares favorably to the broader geographical region. Neighboring Los Angeles County's percentage was 56.03; Orange County, 49.26; San Bernardino, 43.79; and San Diego, 47.70.

*Geography and Income: R/ECAPS*

According to the AFFH-T Data Documentation for 2017, HUD developed a census tract-based definition of racially or ethnically-concentrated areas of poverty, or R/ECAPS: "The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPS must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of "extreme poverty" as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40 percent or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPS." Since these extreme poverty neighborhoods are unlikely to have racial

or ethnic concentrations as high as 50 percent, the threshold is set at 20 percent.

**Table II-10** below shows demographic information for areas deemed as R/ECAPS within the County and the region. In terms of race and ethnicity, we can glean that these regions of the County are slightly more White than in the region at large, and lean slightly more Hispanic and Asian/Pacific Islander than the region also. The ratio of Blacks within these high poverty areas of the County, however, is half that of the region, 4.37 percent vs. 9.78 percent.

In terms of foreign-born nationals living within enclaves of poverty, Mexican nationals outnumber their counterparts in the region 27.22 percent to 23.29 percent. Of all foreign nationals, Mexican-born residents comprise by far the largest segment of R/ECAP populations, with the next largest segment being El Salvadorans and Guatemalans, who together make up 2.02 percent of these areas, followed by Chinese nationals within the County at 0.59 percent, and Philippine nationals within the region at 0.36 percent.

The large number of Mexican-born residents (25,761) brings the total number of Hispanics within R/ECAPS to 68,412, far outnumbering all other ethnic and racial groups within these areas, at 72.28 percent of the total, and far exceeding even the latest estimates that place this group at 48 percent of the general population.

**Table II-10  
R/ECAP Demographics**

	Riverside County		(Riverside-San Bernardino-Ontario, CA) Region			
R/ECAP Race/Ethnicity	#	%	#	%		
Total Pop. in R/ECAPs	94,647	-	216,883	-		
White, Non-Hispanic	14,741	15.57%	31,772	14.65%		
Black, Non-Hispanic	4,135	4.37%	21,220	9.78%		
Hispanic	68,412	72.28%	150,371	69.33%		
Asian or Pacific Islander, Non-Hispanic	5,554	5.87%	8,676	4.00%		
Native American, Non-Hispanic	430	0.45%	938	0.43%		
Other, Non-Hispanic	131	0.14%	390	0.18%		
<b>R/ECAP Family Type</b>						
Total Families in R/ECAPs	18,358	-	42,614	-		
Families with children	11,367	61.92%	26,863	63.04%		
<b>R/ECAP National Origin</b>						
Total Pop. in R/ECAPs	94,647	-	216,883	-		
#1 country of origin	Mexico	25,761	27.22%	Mexico	50,507	23.29%
#2 country of origin	El Salvador	1,239	1.31%	El Salvador	2,563	1.18%
#3 country of origin	Guatemala	676	0.71%	Guatemala	1,424	0.66%
#4 country of origin	China excl. Hong Kong & Taiwan	557	0.59%	Philippines	775	0.36%
#5 country of origin	Korea	269	0.28%	China excl. Hong Kong & Taiwan	750	0.35%
#6 country of origin	Philippines	261	0.28%	Vietnam	619	0.29%
#7 country of origin	Canada	132	0.14%	Honduras	556	0.26%
#8 country of origin	Cambodia	87	0.09%	Korea	384	0.18%
#9 country of origin	Honduras	82	0.09%	Canada	239	0.11%
#10 country of origin	Germany	82	0.09%	Taiwan	239	0.11%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

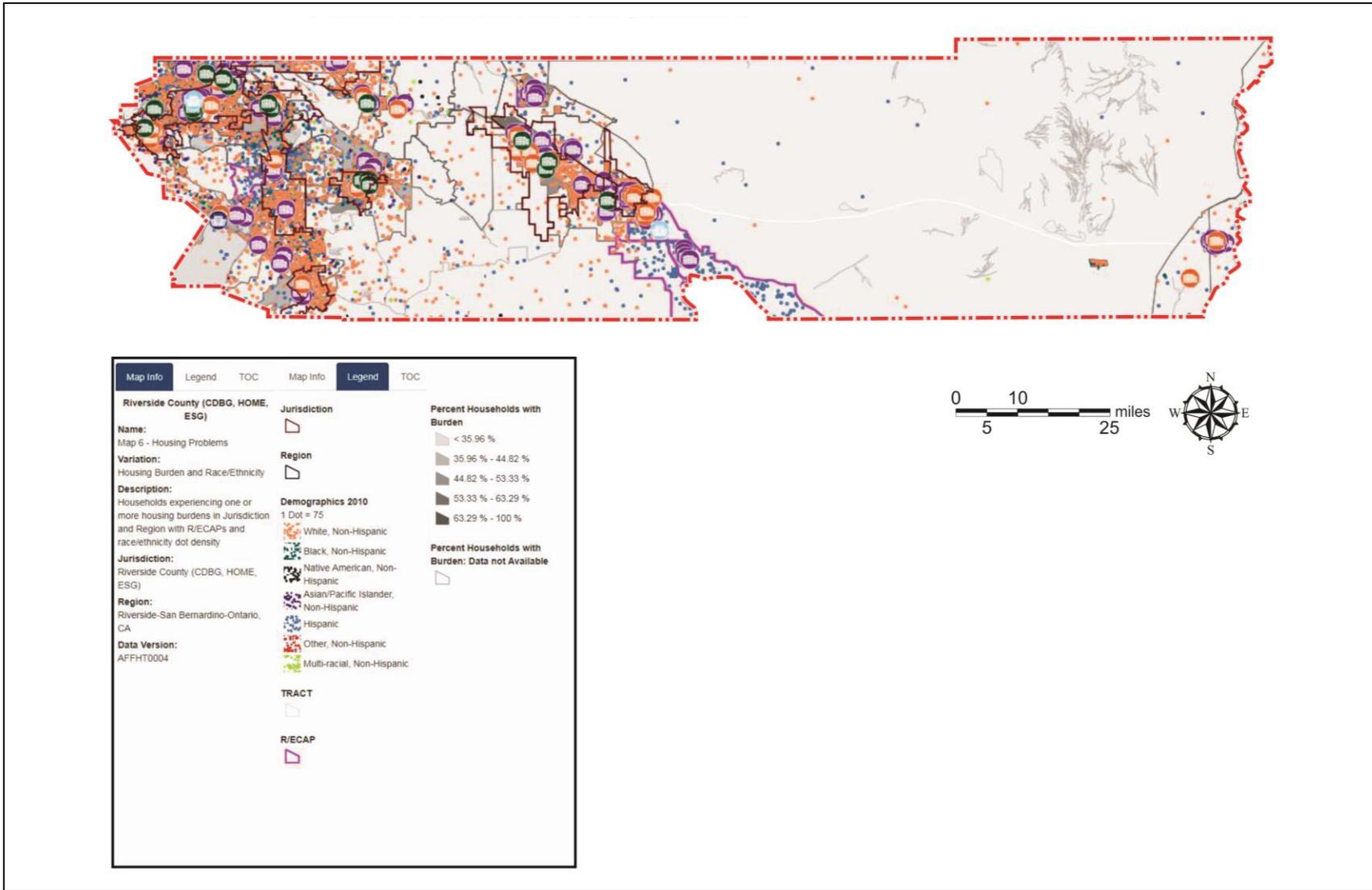
Note 2: Data Sources: Decennial Census; ACS

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

*Cost Burden*

**Map II-2** on the following page shows the geographic distribution of high concentrations of households with housing burden within the County of Riverside. The geographic area in which 53.33 percent or more of households experience cost burden, indicated by darker grey-shading, is located just northwest of Palm Springs, in the vicinity of White Water. Other areas appearing to have concentrations of housing burden of up to 44.82 percent are located around the City of Perris and in the extreme southwestern region of the County in what appears to be unincorporated territory south of Murrieta.

Map II-2: Housing Problems: Housing Burden and Race/Ethnicity



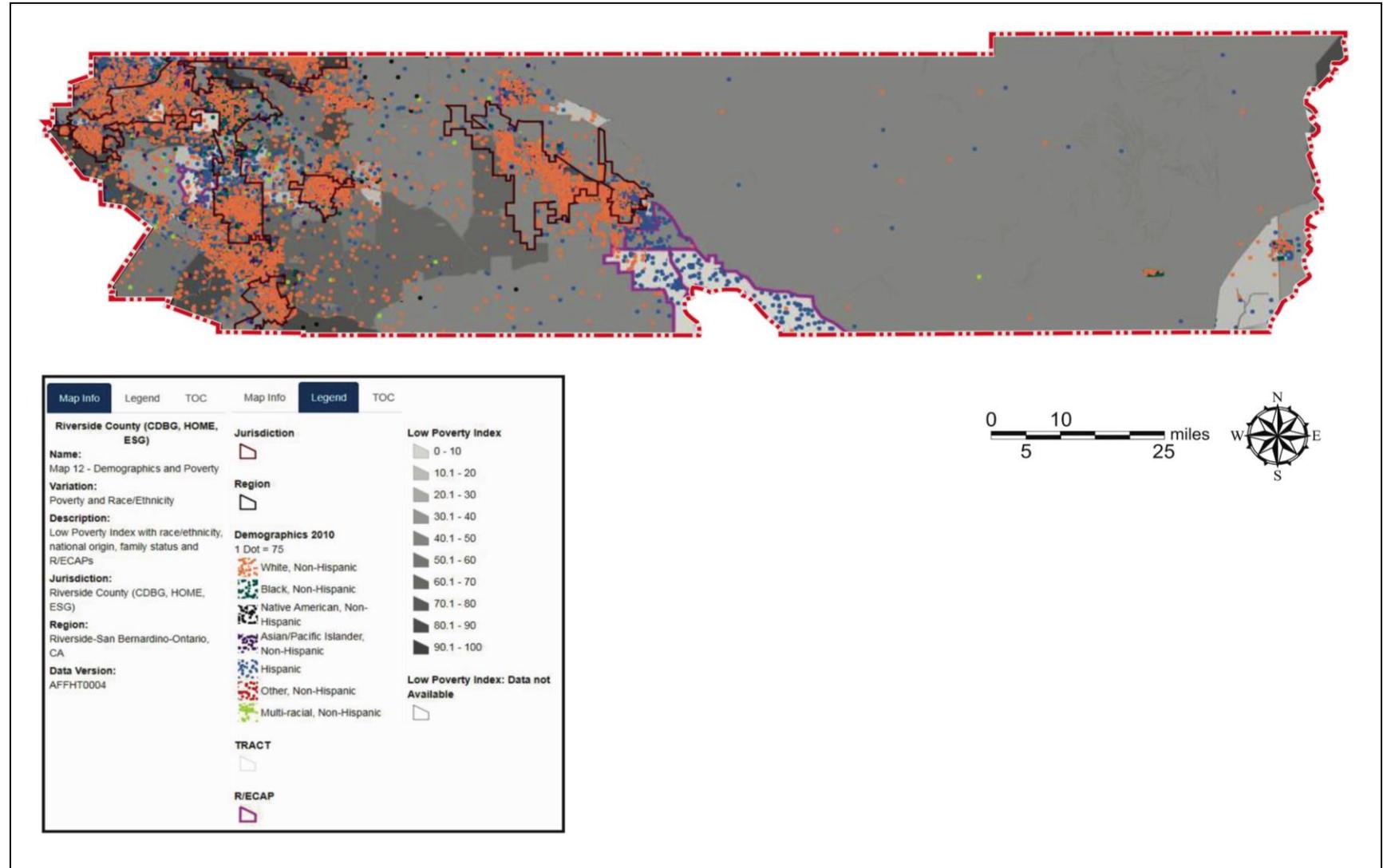
Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

*Low Poverty Index*

According to HUD, the low poverty index captures poverty in a given neighborhood. The index is based on the poverty rate. The poverty rate is determined at the census tract level. Values are inverted and percentile ranked nationally. The resulting values range from 0 to 100. The higher the index score, the less exposure to poverty in a neighborhood.

**Map II-3** on the following page shows a few areas that stand out as being a paler shade of grey than the County as a whole, indicating higher exposure to poverty. These include the area around Woodcrest, due southeast of downtown Riverside, as well the region radiating out from Perris, which is also heavily Hispanic, as indicated by a preponderance of blue dots. The other conspicuously pale region on the map is the area near the Salton Sea, southeast of Indio, including Valerie, One Hundred Palms, Mecca and Oasis, also heavily Hispanic.

Map II-3: Demographics and Poverty



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

## D. Employment Profile

Local economic characteristics impact local housing needs, even though these characteristics may not be directly related to fair housing. These economic characteristics include the types of jobs available within the municipality, the way residents access jobs (e.g., auto, transit, etc.), the types of occupations held by residents, and their household income. This section explores economic trends and characteristics in Riverside County as a means of identifying and understanding local housing needs.

### *Major Employers*

Riverside’s top 10 employers are primarily in the Medical, Education, and Municipal sectors. While one major retail company, Amazon, remains among the top ten County employers, it is surpassed by the U.S. Military, a major university, and a regional government bureaucracy in terms of numbers of employees. **Table II-11** lists the top 10 major employers in Riverside County.

**Table II-11**  
**Major Employers in Riverside**

Name of Business or Institution	Number of Employees	Location	Type of Business
County of Riverside	21,215	Countywide	County Gov.
March Air Reserve Base	9,000	March ARB	Military
Univ. of Calif. Riverside	8,735	Riverside	Education
Kaiser Permanente Riverside Medical Ctr	5,592	Riverside	Medical
Corona-Norco Unified School District	4,989	Corona	School District
Pechanga Resort & Casino	4,863	Temecula	Leisure/Hospitality
Riverside Unified School District	4,236	Riverside	School District
Hemet Unified School District	4,302	Hemet	School District
Eisenhower Medical Center	3,743	Rancho Mirage	Medical
Moreno Valley Unified School District	3,684	Moreno Valley	School District

Source: Riverside County Center for Demographics, 2018

### *Jobs Held by Residents*

According to the 2013-2017 American Community Survey, the total employed civilian population within the County over 16 years of age is estimated at 978,726 (S2405). Another estimate reports the total population aged 16 and older at 1,813,707, with an attendant labor force participation rate of 60.1 percent, and an employment/population ratio of 54.0 percent (S2301). The same estimate places the unemployment rate within the County at 9.9 percent. Compared to the same estimates from decennial year 2010, unemployment has dropped slightly from 11.2 percent, but the labor force percentage and employment/population ratios

have also dropped from 62.3 percent and 55 percent respectively. **Table II-12** below shows the occupations of residents, the number of residents in each category, and the percentage employed in each occupation. Of particular note is the high proportion of managerial/professional and sales/office occupations held by Riverside County residents.

**Table II-12  
Occupation Characteristics**

Occupations of Residents	Number of Residents	% Employed by Occupation
<b>Total civilian employed population 16 and over</b>	978,726	
Management, business, science, and arts	287,745	29.4%
Service	209,447	21.4%
Sales and office	240,767	24.6%
Natural resources, construction, and maintenance	111,575	11.4%
Production, transportation, and material moving	129,192	13.2%

Source: 2013-2017 American Community Survey, S2405

*Labor Market Engagement Index*

According to HUD, “The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract” (AFFH-T Data Documentation 2017). Educational attainment is a measure of those within a census tract who have achieved a bachelor's degree or higher. Values are ranked by national percentile and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood.

As shown in **Table II-13** on the following page, the group with the highest Labor Market Index scores in both the jurisdiction and the region is Asians or Pacific Islanders, at 40.96. This group is followed by Whites, at 35.68; Blacks, at 29.68; then Native Americans, at 27.08, and Hispanics, at 25.01. HUD attempts to correct for income disparities by statistically separating out the population below the federal poverty level. For Riverside residents below the poverty line, the numbers decrease by an average of 7.28 points, with the largest decrease, 10.34 percent, occurring among Asians and Pacific Islanders in poverty.

Compared to the region, the jurisdiction posts Labor Market Index scores that are slightly higher across all ethnic groups, with the exception of Asian and Pacific Islanders, who as a group fare slightly better regionally. The County's scores remain slightly higher across the board when the population below the poverty line is compared to the region.

**Table II-13**  
**Opportunity Indicators by Race/Ethnicity**

County of Riverside							
	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transit Cost Index	Jobs Proximity Index	Environ. Health Index
<b>Total Population</b>							
White, Non-Hispanic	55.92	51.19	35.68	38.74	25.03	50.62	54.83
Black, Non-Hispanic	47.02	45.39	29.68	41.33	28.64	46.97	44.65
Hispanic	38.69	39.86	25.01	41.66	29.63	47.45	47.11
Asian or Pacific Islander, Non-Hispanic	60.56	56.38	40.96	40.92	25.85	46.77	46.11
Native American, Non-Hispanic	44.82	42.23	27.08	37.17	25.31	48.18	56.08
<b>Population below federal poverty line</b>							
White, Non-Hispanic	43.19	43.48	28.72	41.08	30.39	51.17	43.19
Black, Non-Hispanic	33.61	37.66	21.83	43.15	32.22	46.08	33.61
Hispanic	24.98	33.27	17.61	43.77	33.56	49.17	24.98
Asian or Pacific Islander, Non-Hispanic	45.94	45.38	30.62	44.13	34.80	49.34	45.94
Native American, Non-Hispanic	36.65	41.42	23.25	38.89	29.50	52.34	36.65
<b>Region</b>							
<b>Total Population</b>							
White, Non-Hispanic	52.61	50.65	34.50	37.96	25.75	49.50	55.48
Black, Non-Hispanic	42.80	41.50	27.18	42.55	31.82	49.72	44.22
Hispanic	37.51	37.99	24.20	43.12	32.68	47.81	42.38
Asian or Pacific Islander, Non-Hispanic	60.42	56.42	43.02	41.92	29.18	48.25	42.29
Native American, Non-Hispanic	41.19	40.74	25.06	36.84	26.34	50.16	56.24
<b>Population below federal poverty line</b>							
White, Non-Hispanic	38.39	42.36	25.55	38.74	29.20	49.95	56.84
Black, Non-Hispanic	27.15	30.84	17.39	43.48	34.78	48.95	44.86
Hispanic	23.78	31.06	16.42	44.76	36.54	49.34	42.23
Asian or Pacific Islander, Non-Hispanic	42.30	43.14	30.51	45.00	37.05	51.32	39.74
Native American, Non-Hispanic	30.24	34.37	20.61	39.17	32.05	52.23	50.63

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA  
 Note 2: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

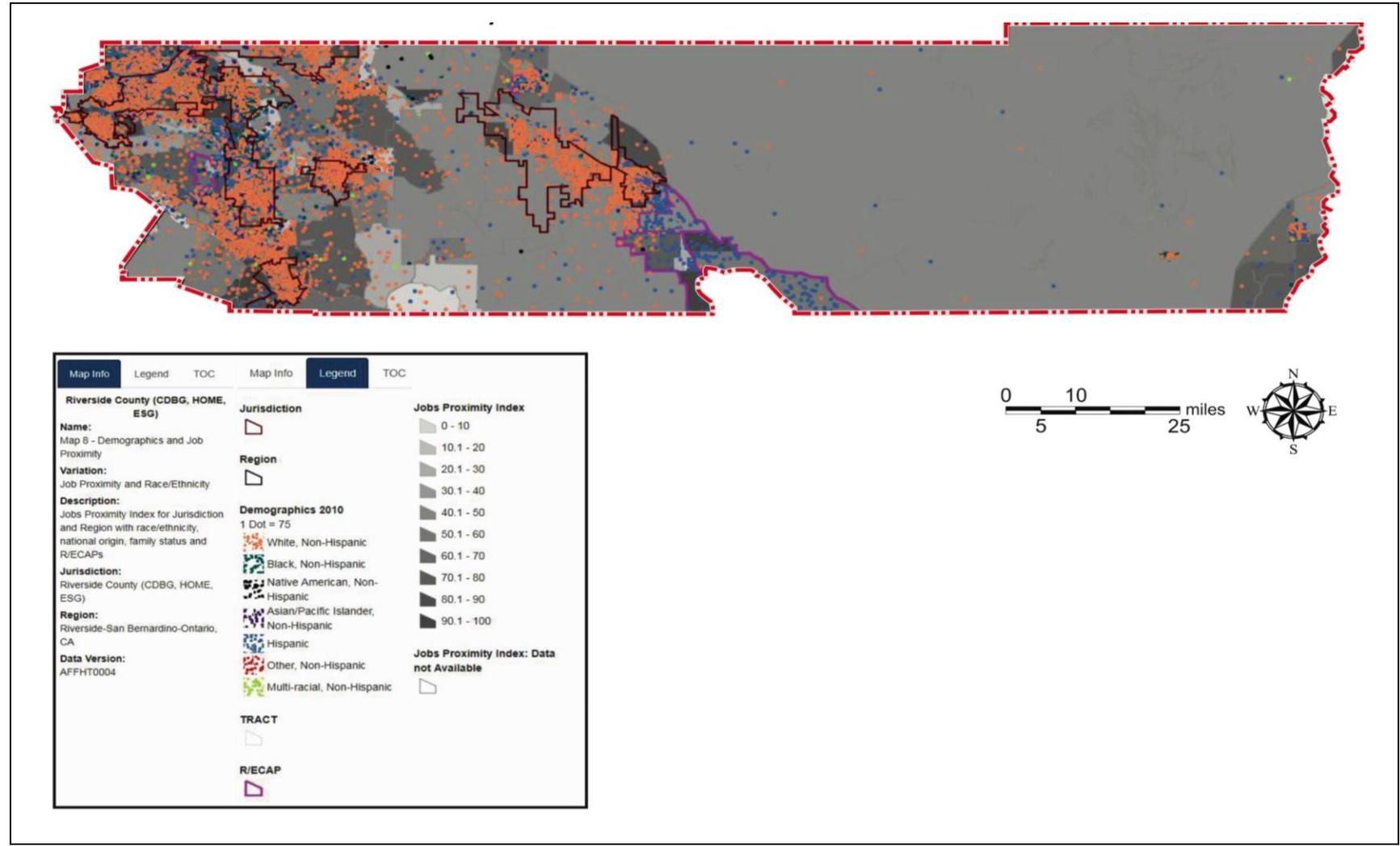
### *Jobs Proximity Index*

HUD states, “The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily.” “Values are percentile ranked at the CBSA level with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.”

**Table II-13** on the previous page presents Jobs Proximity Index rankings for various groups, broken down by ethnicity and with separate statistics for residents below the poverty level. The scores for the jurisdiction are fairly consistent, even when compared to scores for residents below the federal poverty line. In fact, the highest score in the jurisdiction is among Native Americans below the poverty line, at 52.34. The lowest score is assigned to Blacks in poverty, at 46.08. The other four ethnic groups scored higher among their populations in poverty than among their general populations: Whites, at 51.17, Hispanics at 49.17, and Asians and Pacific Islanders at 49.34. These relatively high Jobs Proximity Index scores for populations in poverty indicate a co-location of job centers and high poverty neighborhoods.

Examination of **Map II-4** on the following page shows the distribution of geographic areas with high Jobs Proximity Index scores, indicated by the darker shaded areas, along with the distribution of various racial groups, indicated by colored dots, representing clusters of 50 people. One might expect the highest scores, and therefore the darkest shaded regions, to fall in and around major metropolitan areas and along major Interstates. That is, in fact, the case along Interstate 215 leading toward Perris, which provides convenient access to two of the County’s top employers, March Airforce Base, and Amazon. However, somewhat contrary to expectations, it appears the regions with greatest access to jobs actually lie along more remote State Routes such as the Ramona Expressway north and east of Hemet, and the outlying regions of Temecula and of the Coachella Valley, including the area around the Salton Sea. As was stated in our analysis in the previous paragraph, this latter shaded area in particular indicates a co-location of jobs and relatively high poverty areas. A likely explanation for this seeming disparity is the prominence of the Indian gaming industry within Riverside County, which provides significant employment to residents in and around reservations, which themselves often lie in outlying, poorer areas.

Map II-4: Demographics and Job Proximity



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Riverside residents in urban and suburban areas generally enjoy superior access to transportation infrastructure, which includes the RTA bus system, the Sun Line Transit Agency in the Palm Springs area, Palo Verde Transit Agency in the Blythe area, the Riverside Metrolink Station, with links to San Bernardino County’s Omnitrans system as well as to Amtrak, the Corona Transit Center, and the West Corona Metrolink Station. The County is home to at least four municipal airports, (Banning Muni Airport, Corona Muni Airport AJO, Palm Springs International Airport, Riverside Muni Airport), five County-owned and operated airports (Chiriaco Summit, French Valley, Hemet Ryan, Jacqueline Cochran, and Blythe), and enjoys proximity to Ontario International Airport. The County is also traversed by numerous major freeways within its boundaries (Interstates 10, 15, 215, and State Routes 60, 91, 71, 74, 79, 86, and 111).

**E. Housing Profile**

**Overview**

Fair housing is also concerned with the availability of a range of housing types and prices. This section provides an overview of the housing market and of the dynamics affecting housing availability. Later sections of this A.I. study build on this analysis and evaluate the County’s land use regulations to assess the status of fair housing in this community.

*Available Housing Units*

The predominant housing type in Riverside County remains single-family detached homes, which accounted for 67.61 percent of the County’s housing stock in 2010 (ACS B25024). **Table II-14** shows housing growth trends in Riverside County as compared to the City of Riverside and the region as a whole for the last two decennial years.

Almost on pace with the 41.68 percent population growth within the jurisdiction between 2000 and 2010, Riverside’s housing inventory expanded 36.95 percent. This growth far exceeds the 14.50 percent increase within the City of Riverside over the same period. Statistics for the Metropolitan Statistical Area for the year 2000 are not available.

**Table II-14  
Housing Growth Trends, 2000-2010 (Housing Units)**

Community	2000	2010	Percent Change
Riverside City	85,974	98,444	14.50%
Riverside County	584,674	800,707	36.95%
Riverside-San Bernardino-Ontario	N/A	1,500,344	

Source: U.S. Census, 2000 and 2010, DP-1.

*For-Sale and Rental Housing Prices*

**Table II-15** below shows the median sales price for a single-family home in Riverside for the 2018 calendar year. The data show a 3.3 percent average increase in the sales price for single-family homes.

Condominiums purchasers in the County have also seen their buying power decrease over the last year, as the average price has risen 4.3 percent. In 2018, the average sales price for single-family homes in Riverside is \$377,000 and for condominium units, \$275,000.

**Table II-15  
Riverside County Median Sales Prices – 2018**

Single Family Homes			Condominiums			SFR Only
Number of Sales	Price Median SFR (\$1,000)	Price % Change from Jul. 2017	Sales Count Condos	Price Median Condos (\$1,000)	Price % Change from Jul. 2017	Median Home Price/ Sq. Ft
2,026	\$377	3.3%	360	\$275	4.3%	<b>\$199</b>

Source: Feb. 2018 Dataquick / L.A. Times publishes a report by community/zip code (<https://www.corelogic.com/downloadable-docs/dq-news/dq-news-monthly-charts/december-2018-southland-chart.pdf>)

According to the National Low-Income Housing Coalition’s (NLIHC) ***Out of Reach 2018 Report*** for Riverside County, the Fair Market Rent (FMR) for a two-bedroom apartment is \$1,156. In order to afford this level of rent and utilities, without paying more than 30 percent of income on housing, a household must earn \$3,853 monthly or \$46,240 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$22.23 (<http://nlihc.org/oor/california>).

In Riverside County, a minimum wage worker earns an hourly wage of \$11.00. In order to afford the FMR for a two-bedroom apartment, a household must include 2.03 minimum wage earner(s) working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

For Riverside County, the estimated mean (average) wage for a renter is \$13.32 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a household must include 1.68 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

**Table II-16**  
**Riverside County Cost of Rental Housing**

Fair Market Rents by Number of Bedrooms										
Year	Efficiency		1 Bedroom		2 Bedrooms		3 Bedrooms		4 Bedrooms	
	FMR	Incr.	FMR	Incr.	FMR	Incr.	FMR	Incr.	FMR	Incr.
2013	\$763		\$879		\$1,116		\$1,577		\$1,924	
2014	\$766	0.39%	\$882	0.34%	\$1,120	0.36%	\$1,582	0.32%	\$1,930	0.31%
2015	\$788	2.79%	\$908	2.86%	\$1,153	2.86%	\$1,629	2.89%	\$1,987	2.87%
2016 <sup>1</sup>	\$798	1.25%	\$945	3.92%	\$1,187	2.86%	\$1,672	2.57%	\$2,056	3.36%
2017	\$800	0.25%	\$957	1.25%	\$1,197	0.84%	\$1,682	0.59%	\$2,072	0.77%
2018	\$768	-4.17%	\$926	-3.35%	\$1,156	-3.55%	\$1,618	-3.96%	\$2,004	-3.39%
2019	\$826	7.02%	\$986	6.09%	\$1,232	6.17%	\$1,717	5.77%	\$2,132	6.00%

Source: HUD Fair Market Rents.

Note: Beginning in 2016, data reported for Riverside-San Bernardino-Ontario MSA.

The HUD Fair Market Rents by number of bedrooms over the last six years are shown in **Table II-16** above. Since 2013, the FMR for a 2 Bedroom apartment has increased 10.39 percent, while the rent for an efficiency apartment has risen 8.26 percent.

**Table II-17**  
**Income Needed to Afford FMR – Riverside County 2018**

Annual Income					Percent of Family AMI				
0 BR.	1 BR	2 BR	3 BR	4 BR	0 BR.	1 BR	2 BR	3 BR	4 BR
\$30,720	\$37,040	\$46,240	\$64,720	\$80,160	51%	61%	76%	106%	132%

Source: National Low Income Housing Coalition, 2018.

**Table II-17** above shows the annual household income needed to afford rental units at the Fair Market Rent levels. It is clear that a family earning the area median income of \$60,800 would find it impossible to afford fair market rent for a 2-bedroom apartment without expending over two times the recommended 30 percent of that income on housing.

### *Housing Supply*

According to the 2013-2017 American Community Survey (ACS), Riverside has 711,724 occupied housing units. Of these units, 65 percent are owner-occupied and 35 percent are renter occupied. Another 114,980 units within the County are unoccupied (2013-2017 ACS, CP04).

Vacancy rates are an indicator of housing needs. While vacancies help moderate housing costs, excess vacancies depress rents and home values. Generally, an “optimal” vacancy rate is 1.5 percent to 2.0 percent in the for-sale market and 5.0 percent to 6.0 percent for the rental market. According to the latest ACS estimates, Riverside County’s vacancy rate among homeowners is 1.9 percent; among renters, 5.6 percent. These percentages indicate a high level of utilization of the County’s available housing units.

**Table II-18** below shows the housing supply in Riverside of units in structure by tenure. Of the County’s 462,788 total owner-occupied units, the vast majority, 412,381, or 89.1 percent, are single units, attached or detached. Likewise, of the 248,936 renter-occupied units, the largest share, or 49.5 percent, are single unit attached or detached structures.

**Table II-18**  
**Housing Supply: Occupied Units in Structure by Tenure**

Number of Units in Structure	Total Units		Owner			Renter		
	#	%	#	Share of Category	% of Total	#	Share of Category	% of Total
1, detached or attached	535,732	75.3%	412,381	89.1%	77.0%	123,351	49.5%	23.0%
2 to 9 units	61,161	8.6%	5,654	1.2%	9.2%	55,507	22.3%	90.8%
10 or more units	55,706	7.8%	2,155	0.5%	3.9%	53,551	21.5%	96.1%
Manufactured and all other types of units	59,125	8.3%	42,598	9.2%	72.0%	16,527	6.6%	28.0%
<b>Total:</b>	<b>711,724</b>	<b>100.00%</b>	<b>462,788</b>	<b>65.0%</b>	-	<b>248,936</b>	<b>35.0%</b>	-

Source: U.S. Census Bureau, 2013-2017 American Community Survey, S2504

*Homeownership*

**Table II-19** on the following page shows homeownership percentages relative to rental rates among various racial and ethnic subpopulations within both the jurisdiction and the region. The data show that Whites within Riverside enjoy the privilege of homeownership at a slightly higher rate than Whites within the region, 54.90 percent vs. 50.77 percent. The only other group with elevated homeownership levels in the jurisdiction is the Other, Non-Hispanic group, 13.54 percent of whom are homeowners in the County as compared to 12.79 percent in the region. Blacks, Hispanics, Asians or Pacific Islanders, and Native Americans all fare slightly worse in the jurisdiction in terms of their ability to own their own homes.

**Table II-19**  
**Homeownership and Rental Rates by Race/Ethnicity**

Race/Ethnicity	Riverside County				(Riverside-San Bernardino-Ontario, CA) Region			
	Homeowners		Renters		Homeowners		Renters	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	254,070	54.90%	94,462	37.95%	422,456	50.77%	172,929	34.36%
Black, Non-Hispanic	22,169	4.79%	24,750	9.94%	43,898	5.28%	60,793	12.08%
Hispanic	148,888	32.17%	111,729	44.88%	291,047	34.98%	231,413	45.98%
Asian or Pacific Islander, Non-Hispanic	29,915	6.46%	12,063	4.85%	60,820	7.31%	26,185	5.20%
Native American, Non-Hispanic	2,974	0.64%	2,887	1.16%	5,702	0.69%	5,331	1.06%
Other, Non-Hispanic	62,669	13.54%	48,532	19.50%	106,402	12.79%	90,847	18.05%
Total Household Units	462,788	-	248,936	-	832,117	-	503,249	-

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

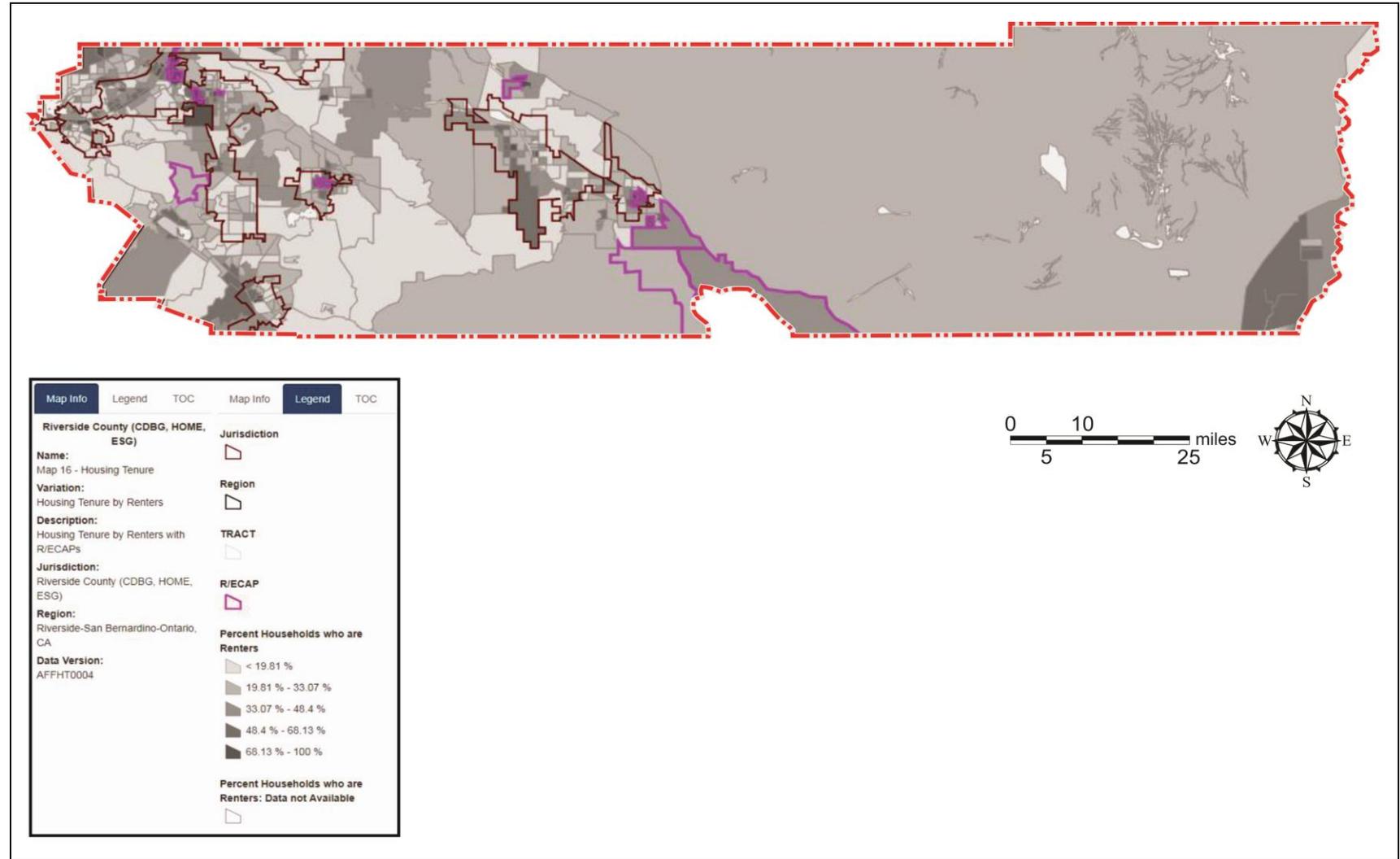
Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: 2013-2017 ACS, (DP04, B25003H, 3B, 3I, 3D, 3E, 3C).

Note 3: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

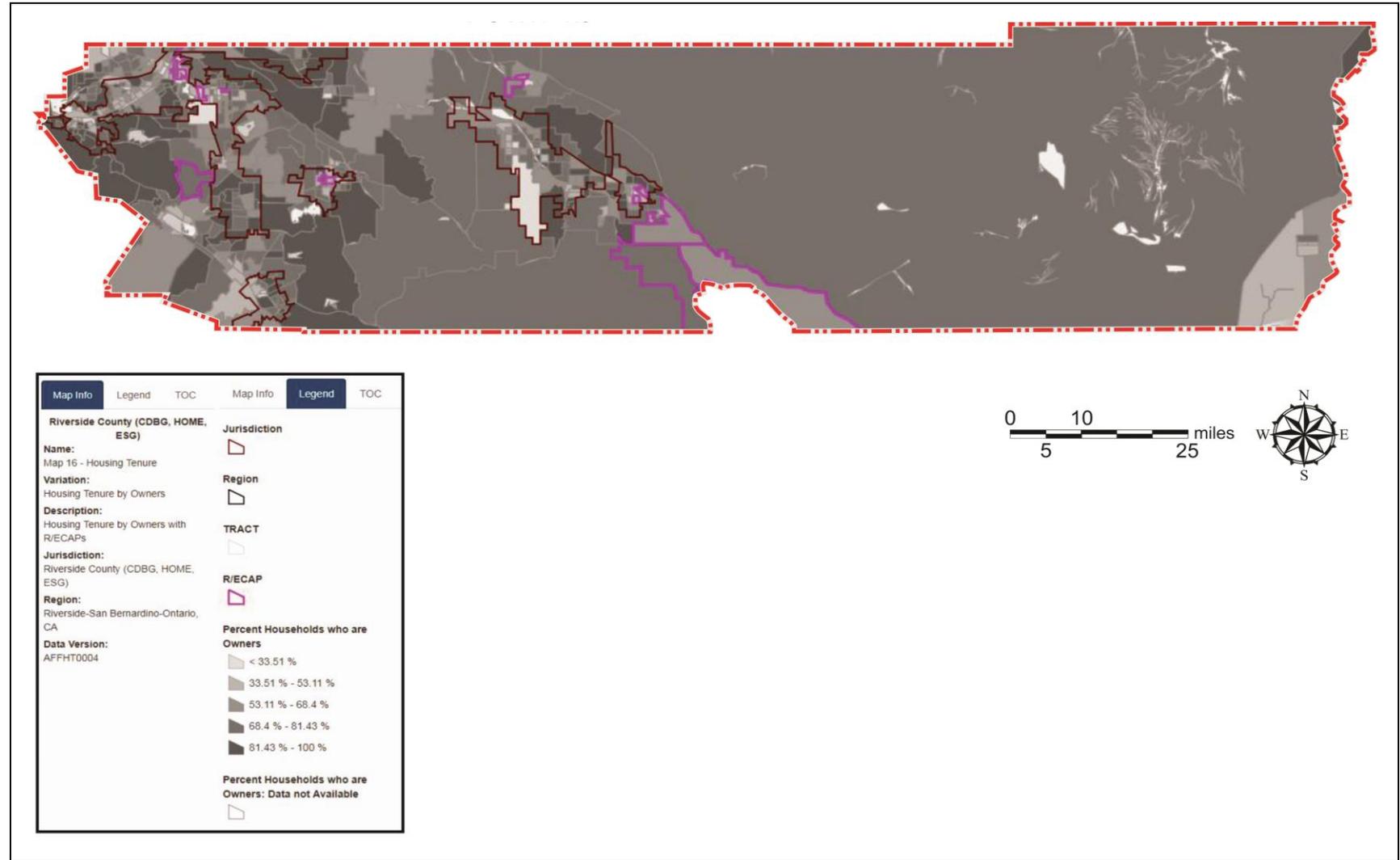
**Map II-5** on the following page by the darkest shaded areas, the census tracts with the highest concentrations of renters within the jurisdiction. The darkest region, with up to 100 percent renters is in the area of Woodcrest, followed by tracts just south of Murrieta, and tracts south of Cathedral City, containing up to 68.13 percent renters. Notably, the areas just southeast of Indio, stretching to the Salton Sea, which are also R/ECAPS, contain ratios of renters up to 48.4 percent. **Map II-6** shows the highest concentrations of homeowners are found in the outlying areas of the jurisdiction, including the tracts south of Norco and Home Gardens, bordered by I-15 and SR-91, as well as the region bordered by I-10 and the Ramona Expressway, the regions north and west of Temecula and extending toward Hemet, and the region north of Palm Springs and Cathedral City.

Map II-5: Housing Tenure by Renters



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Map II-6: Housing Tenure by Owners



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

*Housing Condition – Age*

Like any other asset, housing gradually deteriorates over time. If not regularly maintained, housing can deteriorate into disrepair, depress neighboring property values, discourage reinvestment, and eventually impact quality of life in an entire neighborhood. Maintaining quality housing is thus an important community goal. This section analyzes and discusses the age and condition of Riverside County’s housing and its neighborhoods.

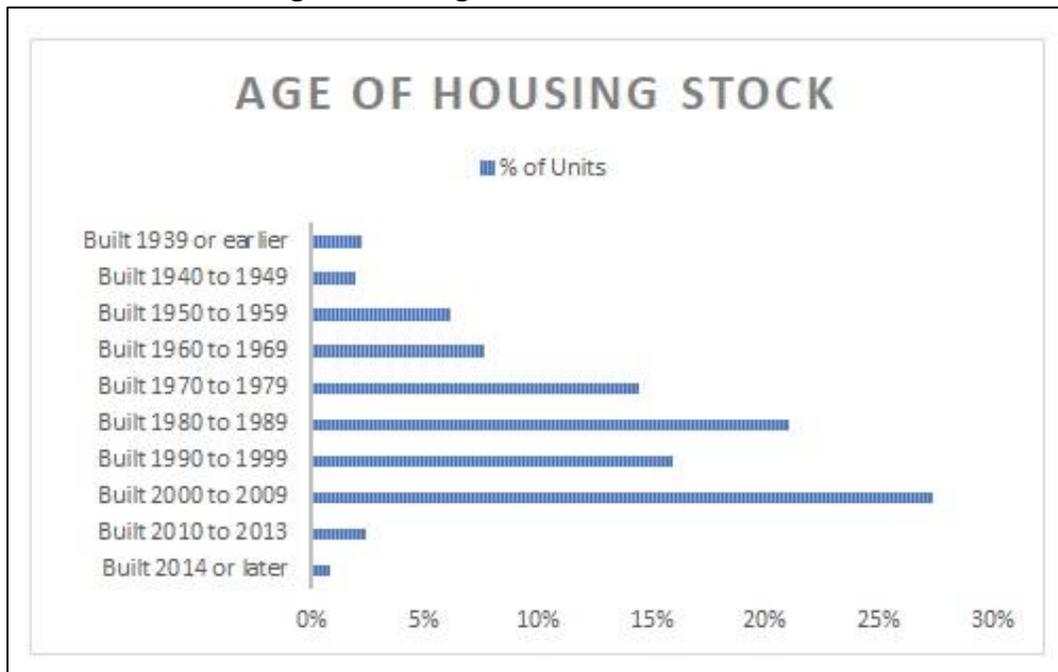
**Table II-20** and **Graph II-1** indicate the number of homes built in Riverside by decade or two-decade period. As of 2017, 32.3 percent of the housing was at least 38 years old. Within the housing industry, as a general rule, homes older than 30 years begin to require major investments to maintain quality. Necessary improvements include siding, painting, and roofing, among others. After 50 years, homes typically need new plumbing, electrical systems, mechanical systems, lead-based paint removal, and other major repairs.

**Table II-20**  
**Age of Housing Stock: Year Unit Built by Tenure**

Year Structure Built	Total Units		Owner			Renter		
	#	%	#	Share of Total	Share of Category	#	Share of Total	Share of Category
2014 or later	6,188	0.9%	4,831	1.0%	78.1%	1,357	0.5%	21.9%
2010 to 2013	17,047	2.4%	10,703	2.3%	62.8%	6,344	2.5%	37.2%
2000 to 2009	194,925	27.4%	140,437	30.3%	72.0%	54,488	21.9%	28.0%
1980 to 1999	263,067	37.0%	170,768	36.9%	64.9%	92,299	37.1%	35.1%
1960 to 1979	156,850	22.0%	91,554	19.8%	58.4%	65,296	26.2%	41.6%
1940 to 1959	57,849	8.1%	35,835	7.7%	61.9%	22,014	8.8%	38.1%
1939 or earlier	15,798	2.2%	8,660	1.9%	54.8%	7,138	2.9%	45.2%
<b>Total:</b>	<b>711,724</b>	<b>100%</b>	<b>462,788</b>	<b>100%</b>	-	<b>248,936</b>	<b>100%</b>	-

Source: U.S. Census Bureau, 2013-2017 American Community Survey, S2504 .

**Graph II-1**  
**Age of Housing Stock: Year Unit Built**



Source: 2013-2017 American Community Survey 5-Year Estimates, B25126.

According to HUD, “Aggressive code enforcement action, including the legal process of property receivership, may be the most cost-effective approach to improve the quality of life in particular instances. A receivership action allows for the correction of the deferred maintenance of the common areas, reestablishes and recapitalizes the homeowner’s association, and imposes on-site management to address tenant problems.” (AFFH-T)

Apart from the receivership option, the County sponsors housing rehabilitation programs to facilitate the rehabilitation of older homes. The Housing and Community Development Division (HCD) of the County’s Economic Development Agency provides financial assistance for the rehabilitation of substandard housing.

According to the County’s website, “the conservation, improvement, and enhancement of existing neighborhoods” is an important goal. Through its Neighborhood Revitalization program, the Redevelopment Agency (RDA) of the County’s Economic Development Agency is committed to “eliminating community or neighborhood blight, where it may occur.” The County further states, “One or more strategies will be employed where neighborhoods are targeted for revitalization by the Board of Supervisors. In this effort, RDA, Community Development Block Grant (CDBG), and/or other sources of dedicated funds will be utilized to: encourage investment in the target neighborhood; rehabilitate and construct needed public infrastructure; enhance accessibility at public facilities; provide code enforcement and graffiti removal; demolish slums; and, conduct beautification programs.”

### *Housing Problems*

The AFFH-T Data Documentation states the following: “To assist communities in describing and identifying disproportionate housing needs in their jurisdictions and regions, the AFFH-T provides data identifying instances where housing problems or severe housing problems exist. The AFFH-T presents housing problems overall, as well as variations by race/ethnicity, household type and household size.”

The AFFH-T provides data on the number and share of households with one of the following four housing problems:

1. Lacks complete kitchen facilities: Household lacks a sink with piped water, a range or stove, or a refrigerator.
2. Lacks complete plumbing facilities: Household lacks hot and cold piped water, a flush toilet and a bathtub or shower.
3. Overcrowding: A household is considered overcrowded if there are more than 1.01 people per room.
4. Cost Burden: A household is considered cost burdened if the household pays more than 30 percent of its total gross income for housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.

Additionally, the AFFH-T provides data on the number and share of households with one or more of the following “severe” housing problems, defined as:

1. Lacks complete kitchen facilities: Household does not have a stove/oven and refrigerator.
2. Lacks complete plumbing facilities: Household does not have running water or modern toilets.
3. Severe Overcrowding: A household is considered severely overcrowded if there are more than 1.5 people per room.
4. Severe Cost Burden: A household is considered severely cost burdened if the household pays more than 50 percent of its total income for housing costs.

According to the data in **Table II-21** on the following page, the total number of households within the jurisdiction is 683,145. Of those households, 337,325, or 49.38 percent, experience housing problems. Among those 337,325 households experiencing problems, 187,835, or 27.50 percent of the total, experience severe housing problems. These percentages are roughly in line with the region, wherein the incidences of housing problems and severe housing problems are 49.19 percent and 27.82 percent respectively. Additionally, as is true in the region, Hispanic and Black households within the jurisdiction experience housing problems and severe housing problems at disproportionately higher rates than the average. Specifically, 59.46 percent of Hispanics and 58.67 percent of Blacks experience housing problems, while 37.16 percent of Hispanics and 32.77 percent of Blacks experience severe housing problems.

Unlike the region, Asians within the jurisdiction experience housing problems at a higher rate than the average, namely 50.96 percent vs. the 49.38 percent of households in general. Likewise, Asians in Riverside County experience severe housing problems disproportionately, at 28.19 percent, as compared to 27.50 percent of households in general.

By contrast, Whites within the jurisdiction are far less likely to experience housing problems, making up 41.38 percent of those experiencing problems vs. 49.38 percent of the population on average. They are also less likely than average to experience severe housing problem, at 20.32 percent versus 27.50 percent for the general population.

**Table II-21  
Demographics of Households with Disproportionate Housing Needs**

	Riverside County			(Riverside-San Bernardino-Ontario, CA) Region		
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
White, Non-Hispanic	146,920	355,051	41.38%	248,500	615,660	40.36%
Black, Non-Hispanic	24,810	42,287	58.67%	56,215	96,380	58.33%
Hispanic	138,825	233,476	59.46%	276,310	469,370	58.87%
Asian or Pacific Islander, Non-Hispanic	18,755	36,803	50.96%	37,085	75,739	48.96%
Native American, Non-Hispanic	1,760	3,380	52.07%	2,874	5,864	49.01%
Other, Non-Hispanic	6,270	12,205	51.37%	12,120	24,015	50.47%
Total	337,325	683,145	49.38%	633,100	1,287,025	49.19%
<b>Household Type and Size</b>						
Family households, <5 people	163,745	375,275	43.63%	310,890	715,300	43.46%
Family households, 5+ people	83,445	129,419	64.48%	160,795	249,069	64.56%
Non-family households	90,135	178,440	50.51%	161,420	322,655	50.03%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
White, Non-Hispanic	72,145	355,044	20.32%	122,935	615,660	19.97%
Black, Non-Hispanic	13,855	42,280	32.77%	32,125	96,380	33.33%
Hispanic	86,750	233,450	37.16%	174,310	469,370	37.14%
Asian or Pacific Islander, Non-Hispanic	10,375	36,804	28.19%	20,279	75,739	26.77%
Native American, Non-Hispanic	990	3,380	29.29%	1,499	5,864	25.56%
Other, Non-Hispanic	3,725	12,205	30.52%	6,870	24,015	28.61%
Total	187,835	683,145	27.50%	358,025	1,287,025	27.82%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

Note 4: (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

### *Environmental Health Index*

According to HUD, “The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level.” The Index combines standardized EPA estimates of

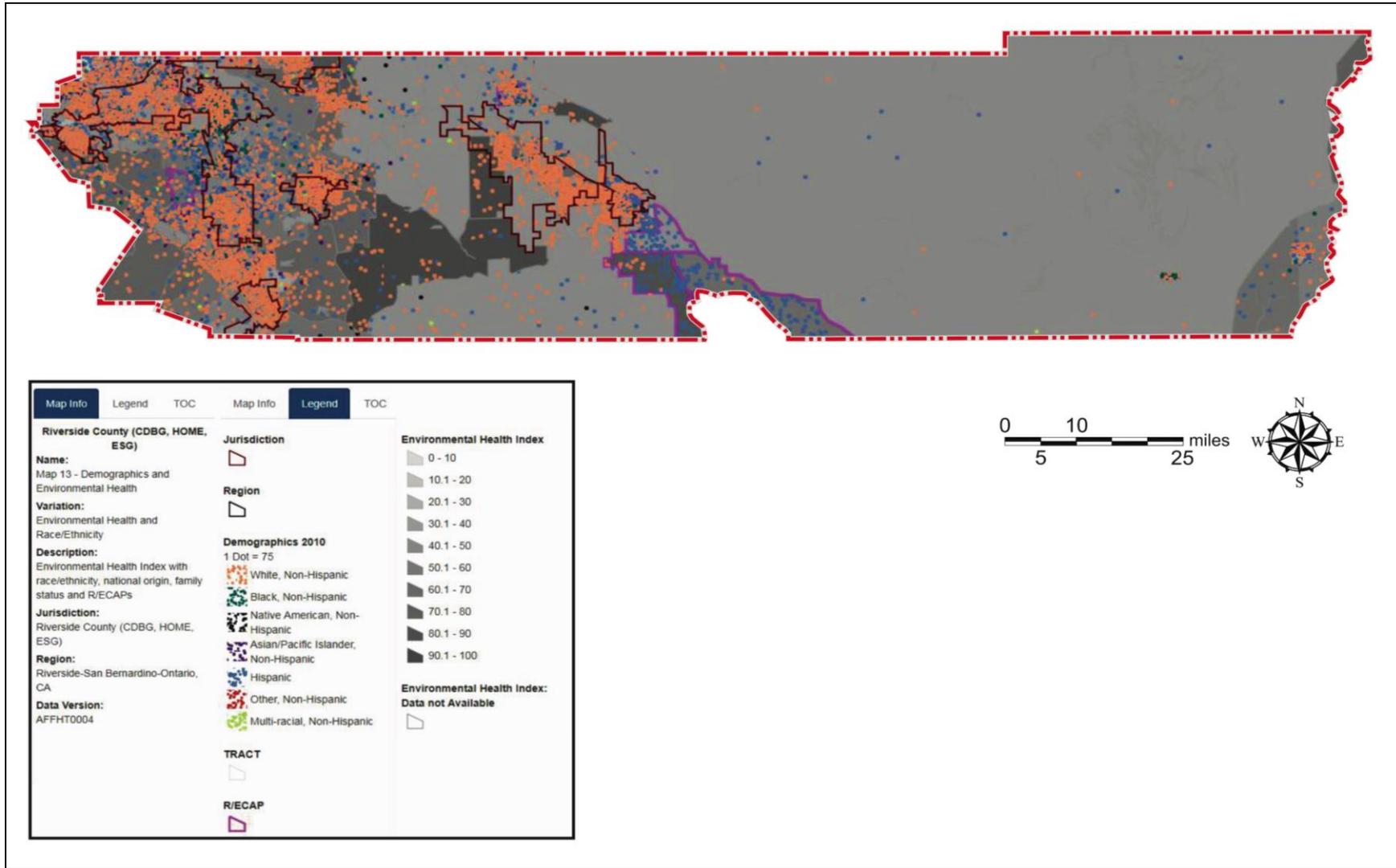
air quality carcinogenic, respiratory and neurological hazards with indexing census tracts. Values are inverted and then percentile ranked nationally. Values range from 0 to 100: the higher the index value, the less exposure to toxins harmful to human health; or, put differently, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census tract.

The EPA standardizes its estimates of air quality hazards using the National Air Toxics Assessment (NATA), which is EPA's ongoing review of air toxics in the United States. EPA developed NATA as a screening tool for state, local and tribal air agencies. NATA's results help these local agencies identify which pollutants, emission sources and places they may wish to study further to better understand any possible risks to public health from air toxics. EPA suggests that local communities use NATA to "prioritize pollutants and emission source types; identify places of interest for further study; get a starting point for local assessments; focus community efforts; inform monitoring programs." According to EPA, communities have found that using NATA helps "inform and empower citizens to make local decisions about their community's health. Local projects often improve air quality faster than federal regulations alone."

Although EPA characterizes NATA results as "a snapshot of outdoor air quality with respect to emissions of air toxics," it nonetheless suggests long-term risks to human health if air toxics emissions are steady over time, including estimates of the cancer risks from breathing air toxics over many years. It also estimates non-cancer health effects for some pollutants, including diesel particulate matter (PM). It is important to note that NATA only includes outdoor sources of pollutants, and its estimates of risk "assume a person breathes these emissions each year over a lifetime (or approximately 70 years). NATA only considers health effects from breathing these air toxics. It ignores indoor hazards, contacting or ingesting toxics, and any other ways people might be exposed." (<http://www.epa.gov/national-air-toxics-assessment/nata-overviewepa.gov>)

**Table II-13** earlier in this chapter presents the Environmental Health Index values for various groups within Riverside and within the region at large. While all ethnic and racial groups within the jurisdiction were assigned Environmental Health Index values that were en par with their counterparts in the region, residents below the poverty level (with the exception of Asians or Pacific Islanders) scored far lower than their regional counterparts. At an index value of 43.19, Whites in poverty within the jurisdiction scored 13.65 points lower than their counterparts in the region. Blacks, at 33.61, were 11.2 points lower than in the region. For Hispanics, the differential was greatest, at 17.25, and the index score itself was lowest, at 24.98. These lower scores are an indication of potentially significantly greater exposure to cancer risks for County residents and of the potential for elevated non-cancer health effects from pollutants such as diesel particulate matter. **Map II-7** on the following page below shows by relative degrees of shading, the overall Environmental Health Index scores for the entire jurisdiction, with lightest-shaded areas surrounding downtown Riverside, as well as the community of Perris, the area south of Lakeland Village and the regions northwest of Temecula and southwest of Hemet.

Map II-7: Demographics and Environmental Health



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

*Affordable Housing*

Following in Table II-22 is an inventory of affordable housing within the County of Riverside. The information was taken from the latest County of Riverside Housing Element, 2017-2021, which was adopted October 3, 2017.

According to the Housing Element, the table below “summarizes the assisted, multifamily rental units in the unincorporated communities of Riverside County. Included are all multifamily rental units assisted under federal, state, and/or local programs, including HUD programs, state and local bond programs, redevelopment programs and local in-lieu fee, tax credit, HOME funds, density bonus, public housing, or direct assistance programs, in the unincorporated County.” (p. H65)

The Housing Element further states “there are no known units at-risk of converting to market rate before 2027. Should a property become at risk, the County maintains an active list of resources by which to preserve that property.”

**Table II-22  
County of Riverside Affordable Housing, 2017**

Project Name and Address	Location	Total Units	Affordable Units	Funding Source(s)	Expiration Date of Covenants
<b>At Risk by 2024</b>					
N/A					
<b>Not at Risk</b>					
Aguirre MHP	Thermal	12	12	County RDA	2041
Arellano MHP	Thermal	12	12	County RDA	2047
Ashley House	Unincorporated DHS	1	1	County RDA	2062
Barroso MHP	Thermal	12	12	County RDA	2040
Chapultepec Apts. (Mecca Family Apartments)	Mecca	31	30	County RDA/LIHTC	2058
Clinton Family Apartments	Mecca	59	58	County HOME, LIHTC	2063
Desert Rose Apartments	Ripley	76	75	County RDA, HCD, FWHG, USDA	2063
Dr. Clair S. Johnson Apartments	Mecca	40	40	County Project Based Vouchers	until sold*

**Community Characteristics**

<b>Project Name and Address</b>	<b>Location</b>	<b>Total Units</b>	<b>Affordable Units</b>	<b>Funding Source(s)</b>	<b>Expiration Date of Covenants</b>
Johnson Apartments Duarte MHP	Thermal	12	12	County RDA	2040
Fairview Lake Townhomes	Unincorporated Lake Elsinore	16	16	County Project Based Vouchers	until sold*
Ferro MHP	Thermal	12	12	County RDA	2039
Halter Hillside Apt	Sun City	118	110	USDA	2046
Hernandez MHP	Thermal	12	12	County RDA	2040
Highgrove Blossom Apts.	Highgrove	89	87	County RDA/LIHTC	2069
Highland Park Place Apartments	Unincorporated Riverside	4	4	County Project Based Vouchers	until sold*
Hope Ranch	Thermal	12	12	County RDA	2059
Las Mananitas	Mecca	16	16	County RDA, CDBG	2032
Legacy Family Apartments	Thousand Palms	81	80	County RDA, MHSA, CalHFA, LIHTC	2067
Lincoln Family Apartments	Mecca	57	56	County HOME, LIHTC	2062
Mecca Apartments II	Mecca	60	59	County HOME, HCD, LIHTC	2060
Mecca III Apartments	Mecca	58	57	County RDA/LIHTC	2060
Mountain View Estates	Mecca	181	90	County RDA	2067
MVR MHP	Thermal	12	12	County RDA	2059
Nueva Vista Apartments	Mecca	32	31	County HOME, HCD, LIHTC	2050
Orange Blossom (RDA) Apartments	Valle Vista	45	44	County RDA	2066
Orange Blossom I (HOME) Apartments	Valle Vista	12	11	County HOME	2069
Paseo de los Heroes I (Mecca Mobile Home Park)	Mecca	106	196	County RDA, HCD	2056
Paseo de los Heroes II	Mecca	53	52	County RDA, FWHG, USDA, LIHTC	2067
Paseo de los Poetas	Mecca	21	21	County HOME, LIHTC	2060

## Community Characteristics

Project Name and Address	Location	Total Units	Affordable Units	Funding Source(s)	Expiration Date of Covenants
Pie De La Cuesta c/o Hyder & Co.	Mecca	68	58	USDA	2034
Ripley/Mesa Verde Infill Housing	Ripley/Mesa Verde	10	10	County RDA	2054
Rodriguez MHP	Thermal	12	12	County RDA	2045
San Antonio El Desierto	Mecca	100	100	HCD	2043
Tamarisk Villas	Ripley	50	50	HCD, USDA	2037
Thermal Apartments	Thermal	28	28	County Project Based Vouchers	until sold*
Thermal II Apartments	Thermal	25	25	County Project Based Vouchers	until sold*
Thunderbird/San Jacinto Vista Apartments (Site A)	Mecca	102	100	LIHTC	2033
Vargas MHP	Thermal	12	12	County RDA	2041
Villas Oscar Romero	Mecca	50	49	HCD	2043
<b>Total</b>		<b>1,709</b>	<b>1,584</b>		

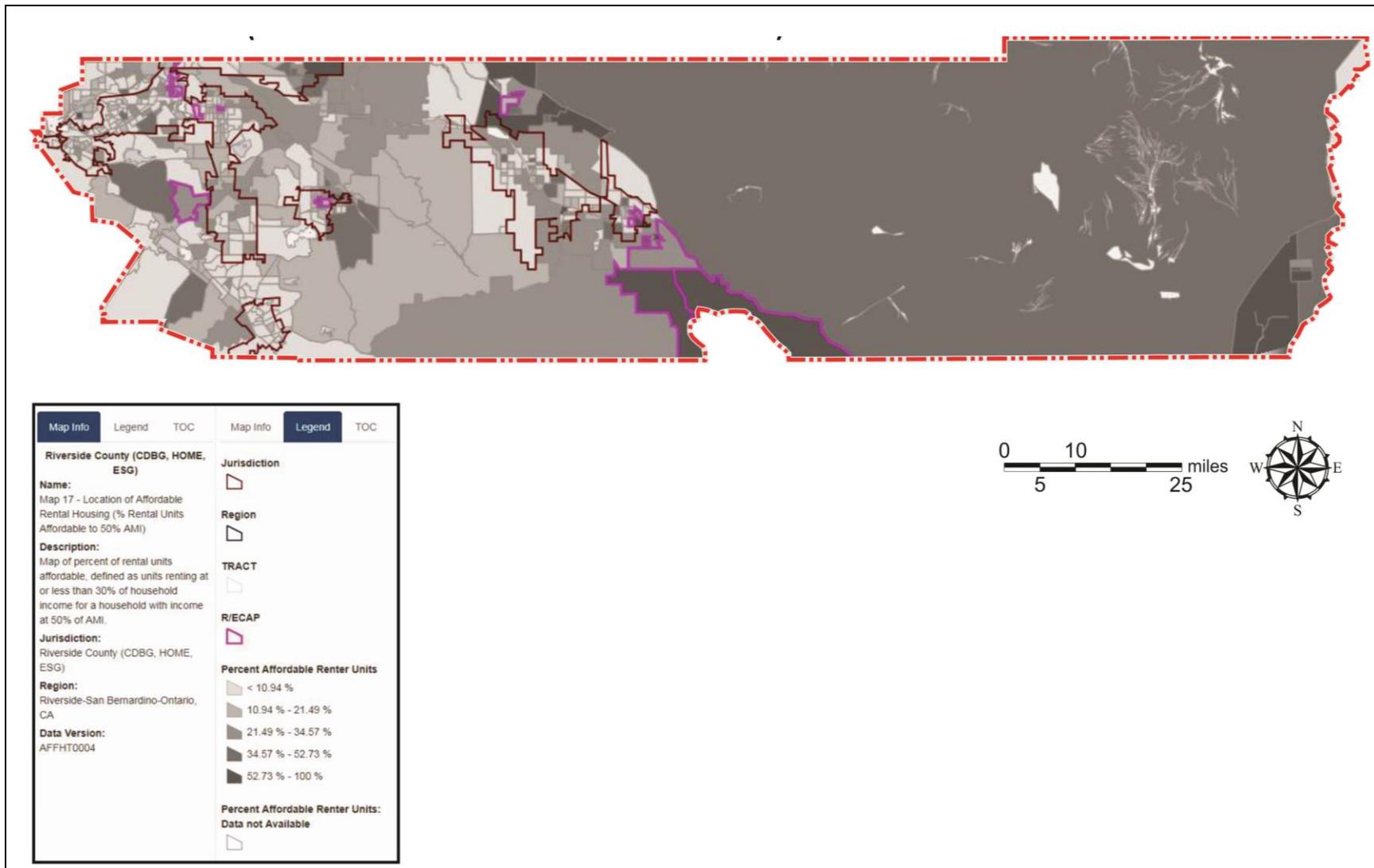
Source: County of Riverside Housing Element 2017-2021, Final Draft ■ Adopted October 3, 2017, p. H66.

Data Source: Riverside County Economic Development Agency; California Housing Partnership Corporation 2017.

\*The units, formerly public housing, were approved by HUD 1/1/2016 for conversion, but did not convert until 10/1/2016 via the process called Rental Assistance Demonstration (RAD) conversion. From 2013 to 2016, the units were still “Public Housing” managed and operated by the HACR until the conversion and transfer to its non-profit arm, Riverside County Housing Corporation (RCHC). Affordability was and is indefinite unless the HACR/RCHC loses its funding due to federal cuts. The HACR does not anticipate losing this funding in the years to come, nor does the RCHC have any plans of selling these properties.

An examination of **Map II-8** on the following page below shows that the tracts with the highest percentages of rental units affordable to residents at 50 percent of AMI are indicated by the darker shaded areas. These are found north of Lake Elsinore and southwest of Perris, adjacent to R/ECAP areas; south of I-15 below Wildomar; north of I-10 above Beaumont; along I-10 from North Palm Springs to Sky Valley; and in the R/ECAP areas surrounding the Salton Sea.

Map II-8: Affordable Housing



Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Race and Ethnicity

**Table II-23** below shows the racial and ethnic makeup of affordable housing residents within the County, as well as the distribution of income levels among these household groups. The data show that both Public Housing and the Housing Choice Voucher (HCV) programs skew toward Blacks, while Other Multifamily programs skew toward Blacks and Asians or Pacific Islanders. Though Blacks make up just 6.65 percent of households earning 0 to 80 percent of AMI, and just 6.19 percent of the jurisdiction's total households, the group comprises 28.91 percent of Public Housing residents, and receives 36.62 percent of Housing Choice Vouchers. Asians and Pacific Islanders, though only 4.13 percent of households under 80 percent AMI, and 5.39 percent of total households, make up 13.4 percent of households receiving Other Multifamily assistance. Hispanics, meanwhile, who make up only 34.18 percent of the jurisdiction's households as well as 43.22 percent of low-moderate households, nevertheless occupy 61.94 percent of the jurisdiction's Project-Based Section 8 Housing.

**Table II-23  
Publicly Supported Households by Race/Ethnicity**

Riverside County	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
<b>Housing Type</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Public Housing	3,863	33.77%	3,307	28.91%	3,891	34.02%	377	3.30%
Project-Based Section 8	578	24.31%	242	10.18%	1,473	61.94%	77	3.24%
Other Multifamily	449	43.30%	109	10.51%	334	32.21%	139	13.40%
HCV Program	2,836	35.13%	2,956	36.62%	2,084	25.82%	161	1.99%
Total Households	355,015	51.97%	42,285	6.19%	233,470	34.18%	36,805	5.39%
0-30% of AMI	32,465	41.71%	6,750	8.67%	32,435	41.67%	3,770	4.84%
0-50% of AMI	54,330	33.78%	11,895	7.40%	69,565	43.25%	6,890	4.28%
0-80% of AMI	107,290	38.63%	18,460	6.65%	120,050	43.22%	11,465	4.13%
<b>(Riverside-San Bernardino-Ontario, CA) Region</b>	<b>White</b>		<b>Black</b>		<b>Hispanic</b>		<b>Asian or Pacific Islander</b>	
<b>Housing Type</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Public Housing	108	17.45%	203	32.79%	265	42.81%	42	6.79%
Project-Based Section 8	1,245	24.20%	1,055	20.51%	2,439	47.41%	366	7.12%
Other Multifamily	672	31.88%	252	11.95%	770	36.53%	404	19.17%
HCV Program	4,542	24.88%	8,293	45.43%	4,965	27.20%	386	2.11%
Total Households	615,660	47.84%	96,380	7.49%	469,370	36.47%	75,739	5.88%
0-30% of AMI	61,410	38.82%	18,475	11.68%	65,705	41.54%	7,940	5.02%
0-50% of AMI	101,180	32.18%	30,355	9.65%	137,770	43.82%	13,890	4.42%
0-80% of AMI	192,920	36.04%	45,500	8.50%	237,820	44.42%	23,430	4.38%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: Numbers presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details  
(<http://www.hudexchange.info/resource/4848/affh-data-documentation>)

These tendencies are repeated within the statistical region. Within the metropolitan statistical region, Asians receive 19.17 percent of Other Multifamily assistance, despite representing 5.88 percent of the population and 4.38 percent of low to moderate-income households. The lion share of Section 8 vouchers, or 47.41 percent, goes to Hispanic families, who make up 36.47 percent of the region's households. Similarly, Blacks, who make up 7.49 percent of the region's households, comprise 45.43 percent of HCV Program participants, and 32.79 percent of Public Housing residents.

These statistical disparities in terms of the distribution of housing assistance within both the jurisdiction and the region can be better understood by examining the degree to which these two groups experience extreme poverty. Of the four groups examined, only two, namely Hispanics and Blacks, are more likely to fall within the extremely low-income range, defined as 30 percent of AMI or less. Hispanics, who make up 34.18 percent of all households within the jurisdiction, comprise 41.67 percent of extremely low-income households. Likewise, Blacks, at only 6.19 percent of households, make up a larger share, 8.67 percent, of extremely low-income households.

#### *Barriers and Opportunities for Housing Choice Vouchers*

In the executive summary of *A Pilot Study of Landlord Acceptance of Housing Choice Vouchers*, August 2018, HUD cites another factor influencing housing choice for low and moderate-income residents, namely discrimination by landlords. The Housing Choice Voucher (HCV) program is the federal government's largest rental housing assistance program. Apart from seeking to increase access to safe, affordable housing, the HCV program is intended "to provide opportunities for low-income families to obtain rental housing outside areas of poverty or minority concentration (HUD, 2009). Voucher holders can, in theory, move anywhere in the country where a PHA administers the program, but their housing choices are severely constrained by their ability to navigate the private rental market, find a unit with rent below the payment standard, and identify a landlord who will participate in the program. Landlords decide, for the most part, if they want to accept vouchers as payment for their rental units."

(<https://www.huduser.gov/portal/sites/default/files/pdf/ExecSumm-Landlord-Acceptance-of-Housing-Choice-Vouchers.pdf>)

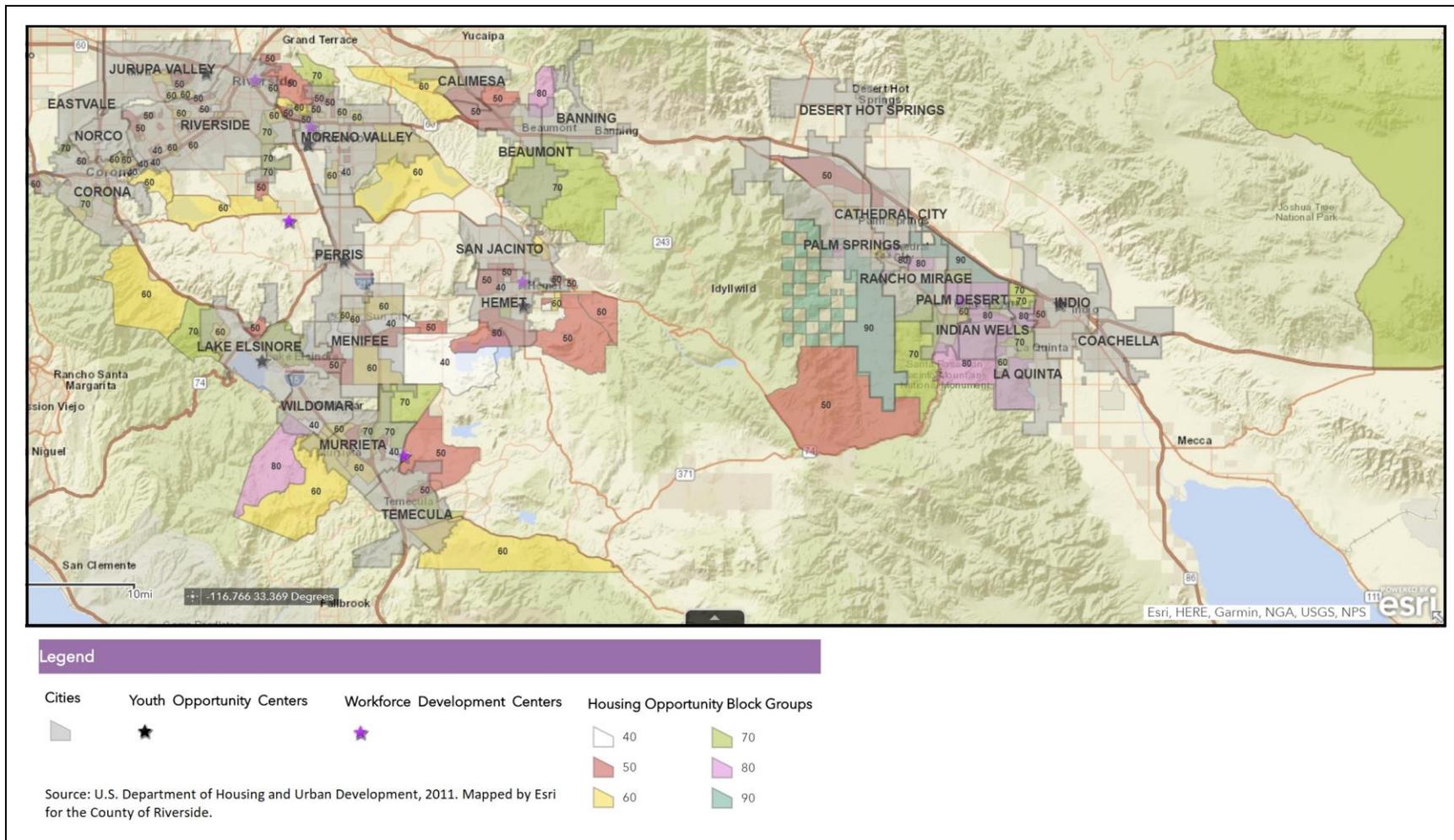
While it is unlawful for landlords under the Fair Housing Act, to refuse to rent to members of protected classes - which are defined on the basis of race, color, national origin, sex, religion, disability, and familial status - voucher holders have no such protection. Therefore, landlords may have a legal right to turn them away. These same classes of people, who include families with children, racial and ethnic minorities, and persons with disabilities, are exactly those whom the HCV program disproportionately serves. Some states and local jurisdictions have attempted to prohibit discrimination against voucher holders through

local ordinances, often referred to as source-of-income protections. These make discrimination against voucher holders illegal. In addition, fair housing advocates argue that claims under the Fair Housing Act may be justified, because practices such as electing not to accept vouchers result in “disparate impacts,” including residential segregation, for a protected class. For HUD's purposes, discrimination was the term used to describe unequal or differential treatment of voucher holders, regardless of whether such treatment was illegal in the testing site.

Although Riverside was not specifically studied, nearby Los Angeles, California was one of five testing sites for the study. According to the study, "The voucher acceptance tests show clear evidence of outright denial of vouchers, although denial rates varied widely. Denial rates were highest in Fort Worth (78 percent) and Los Angeles (76 percent) and only somewhat lower in Philadelphia (67 percent). Rates were substantially lower in Newark (31 percent) and Washington, D.C. (15 percent). Moreover, across the five sites, between 9 and 25 percent of landlords said vouchers were accepted only under certain conditions or they were unsure of the voucher acceptance policy. Landlords were more likely to deny voucher holders in low- poverty areas compared with high-poverty areas, particularly in the sites with the highest voucher denial rates."

HUD has attempted to use multiple criteria measuring the housing, demographic, and economic conditions of each census tract and block group to devise a special index that attempts to pinpoint “opportunity zones.” **Map II-9** below contains the results for Riverside County. According to HUD, the index identifies each tract’s and each block group’s potential opportunity for Housing Choice Voucher (HCV) holders seeking housing. This opportunity score attempts to estimate each neighborhood’s likelihood to provide high quality housing and desirable neighborhood conditions. The index is intended to be used by Public Housing Authorities (PHAs) to help voucher holders identify neighborhoods (variously defined as Census Tracts or Block Groups) that have relatively low poverty rates, an available stock of rental units offered at rents at or below Fair Market Rent limits, a high level of employment and educational opportunities for HCV holders, and a relatively low density of households who receive housing assistance from the HCV as well as other programs. The index is scored from low to high. The lowest index score is 40 while the highest index score is 90. Presumably the area with a score of 40 does provide HCV holders good opportunity to find housing and other opportunities. The area with a score of 90 would offer the most opportunities to HCV holders.

Map II-9: Housing Choice Voucher Opportunity Zones



## F. Special Housing Needs Profile

Certain residents have more difficulty finding decent and affordable housing or receiving fair housing treatment due to special circumstances. These circumstances may include employment and income, family type, disability, or other characteristics. Riverside officials should consider addressing the particular needs of certain racial/ethnic groups, who make up a growing demographic that experiences cost burden and other housing problems disproportionately, in addition to other fair housing issues. Seniors are another burgeoning population sector with similar issues. Single parent households, especially those headed by women, are growing in number and may need special accommodation. Other groups facing challenges include people with disabilities, large families, persons with limited English proficiency, and currently and formerly homeless persons.

**Table II-24** summarizes the proportions of special needs groups in Riverside. The following discussion describes and analyzes the housing needs of each group. Data are from the 2010 Census, the Brown Longitudinal Tract Database (LTDB) based on the census, and the 2009-2013 and 2013-2017 American Community Surveys (ACS).

**Table II-24**  
**Special Needs Groups in Riverside**

Special Needs	2017	
	Number	Percent of County
Senior Citizens <sup>1</sup>	215,684	30.30%
People with Physical Disability	267,680	11.5%
Single-Parents with Children <sup>2</sup>	69,221	9.73%
Large Households <sup>3</sup>	129,591	18.21%
Hispanics	1,130,033	48%%
Black/African American	140,810	6.0%
Asians or Pacific Islander	149,881	6.4%
Limited English Proficiency	51,957	7.3%
Homeless <sup>4</sup>	2,316	

Source: 2013-2017 American Community Survey (ACS).

1. Percent of households with a member age 65 or older, 2013-2017 ACS, B11007.
2. Percent of households, single parent with own children under 18 years, 2013-2017 ACS, S1101.
3. Percent of households with five or more members residing in a home, 2013-2017 ACS, B11016.
4. Riverside County 2018 Point in Time Homeless Count Report.

*Racial/Ethnic Minorities*

Section B of this Chapter outlines the fact that while the White population within Riverside has begun to decline in recent years, mirroring the region's precipitous decline between censuses, both in absolute numbers and in terms of percentages, Non-White populations within the jurisdiction have seen an astronomical growth trend since 1990. This growth includes a greater than 268 percent increase in the Hispanic population within the County, while the same group has grown 191 percent within the region as a whole.

As outlined in Section E above, of the four groups examined, only two, namely Hispanics and Blacks, are more likely to fall within the extremely low-income range, defined as 30 percent of AMI or less. Hispanics, who make up 34.18 percent of all households within the jurisdiction, comprise 41.67 percent of extremely low-income households. Likewise, Blacks, at only 6.19 percent of households, make up a larger share, 8.67 percent, of extremely low-income households.

**Table II-10** in Section E above shows that of the 94,647 County residents in R/ECAPS, fully 68,412 of these, or 72.28 percent, are Hispanic. According to **Table II-9** in Section C above, non-family households and Blacks are more susceptible to cost burden within the County of Riverside than the population in general. **Table II-21** documents that Hispanics and large families (5-plus members), as well as Blacks, experience housing problems disproportionately. Whereas 49.48 percent of households in general experience housing problems, 64.48 percent of large family households experience housing problems, along with 59.46 percent of Hispanic households. Further, whereas 27.50 percent of homeowners experience severe housing problems within the jurisdiction, 37.16 percent Hispanic households experience them.

In terms of homeownership rates, the jurisdiction favors Whites over any other group. While Whites make up 51.97 percent of households (**Table II-23**, Section E above), they account for 54.94 percent of homeowners (**Table II-19**, Section E). Hispanics, by contrast, comprise 34.18 percent of households, but only 32.17 percent of homeowners. Blacks and Asians/Pacific Islanders lag similarly behind Whites.

**Table II-13** (Section D) shows various opportunity index scores that HUD has calculated for the jurisdiction as a measure of relative access to opportunity in such important facets of life as education, employment, and transportation. Riverside scores marginally higher or consistent with the region across various protected groups, with the exception of the Low Transportation Cost Index, wherein the County scores are marginally lower. Generally speaking, these scores indicate that members of most racial and ethnic groups within Riverside enjoy equal or superior access to high performing schools, good jobs, good public transit, and relatively low exposure to poverty. This access to opportunity, however, is not shared by County residents below the poverty line, especially with regard to their exposure to environmental toxics.

Furthermore, the trend toward segregation of these groups within the County continues at a much greater rate than that evinced within the region as a whole. The level of segregation between Whites and Non-Whites, as measured by the Dissimilarity Index (**Table II-3**, Section B), has increased by 22.92 percent since 1990, in keeping with the regional increase of 25.4 percent during the same period. This trend holds true for every ethnic/racial group within the County as compared to their regional counterparts, with Hispanic/White segregation increasing by 24.12 percent.

**Map II-3**, (Section C above) shows that the neighborhoods in Riverside with the lowest poverty index scores, and thereby the highest exposure to poverty, are the area around Woodcrest, due southeast of downtown Riverside; the region radiating out from Perris, which is heavily Hispanic, and the area near the Salton Sea, southeast of Indio, including Valerie, One Hundred Palms, Mecca and Oasis, also heavily Hispanic. **Map II-2** (Section C) shows elevated levels of housing burden just northwest of Palm Springs, in the area of White Water; around the City of Perris; and in the extreme southwestern region of the County in what appears to be unincorporated territory south of Murrieta. The darkest region of **Map II-4** (Section E), indicating up to 100 percent renters is in the area of Woodcrest, followed by tracts just south of Murrieta, and tracts south of Cathedral City, containing up to 68.13 percent renters. Notably, the areas just southeast of Indio, stretching to the Salton Sea, which are also R/ECAPS, contain ratios of renters up to 48.4 percent. **Map II-7** (Section E) shows the higher propensity toward environmental health hazards within some of these same census tracts with lightest-shaded areas surrounding downtown Riverside, as well as the community of Perris, the area south of Lakeland Village and the regions northwest of Temecula and southwest of Hemet.

**Map II-8** shows the tracts with the highest percentages of rental units affordable to residents at 50 percent of AMI are found north of Lake Elsinore and southwest of Perris, adjacent to R/ECAP areas; south of I-15 below Wildomar; north of I-10 above Beaumont, along I-10 from North Palm Springs to Sky Valley, and in the R/ECAP areas surrounding the Salton Sea.

All of these data underscore one of the main fair housing issues facing the County at present, which is access to opportunity.

### *Senior Citizens*

According to the 2010 Census, 11.81 percent of Riverside's residents were seniors, defined as persons age 65 or older. This statistic represents a 68.03 percent increase in this population since 1990 (**Table II-4**, Section B). American Community Survey (ACS) estimates for 2017 place the percentage of seniors in Riverside at 13.5 percent, which represents nearly a 106 percent increase since 1990. By either measure, seniors comprise a significant and growing contingent of Riverside residents, who need particular accommodation in the

area of housing, due to limited income and higher disability rates, including ambulatory and other disabilities that require significant retrofitting of housing units.

By current ACS estimates, of the 101,856 households in poverty in the 12 months prior to the survey, 4,484 were elderly married households; 518 were elderly male family households; 1,685 elderly female family households; 4,125 non-family elderly males; and 9,398 were non-family elderly females (B17017). These total 20,210 senior households in poverty, or 19.84 percent, of all households in poverty. In terms of disabilities, 11.44 percent of County residents over 5 years of age have disabilities. As shown in **Table II-25** below, the largest share of disabled persons within the County is between the ages of 18 and 64 and represents 5.79 percent of the total population over 5 years of age. At 118,412, this number represents 9.03 percent of the 1,310,947 County residents within this age group. By comparison, the 97,182 disabled persons over 65 represent well over one-third, or 37.58 percent, of the total of 258,586 elderly persons within the community.

**Table II-25  
Disability by Age Group**

Age of People with Disabilities	County of Riverside		(Riverside-San Bernardino-Ontario, CA) Region	
	#	%	#	%
age 5-17 with Disabilities	18,284	0.89%	37,092	0.95%
age 18-64 with Disabilities	118,412	5.79%	241,640	6.19%
age 65+ with Disabilities	97,182	4.76%	174,002	4.46%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: All % represent a share of the total population 5 years and older within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

According to the California Department of Social Services, there are hundreds of residential and day facilities to serve elder and adult residents of Riverside County. These include the following:

- 459 Residential Elder Care Facilities with a capacity to serve 10,168 people;
- 37 Adult Day Facilities with a capacity to serve 2,459 people;
- 304 Adult Residential Facilities with a capacity to serve 1,743 people;
- 5 Community Crisis Homes or Social Rehabilitation Facilities with a capacity to serve 65 people;
- 76 licensed home care agencies providing service throughout the County.

However, the cost of such facilities is out of range for many seniors. While Medical covers the cost of residential care for some who qualify, others could maintain their independence longer in thoughtfully designed senior public assisted housing that offers case management, meal services, transportation to and from doctors' offices, grocery stores and senior centers, as well as other on-site programs designed to prevent social isolation. Still other seniors, with targeted intervention and support, could be helped, in the parlance of social service professionals, to "age in place," within their own homes. For many, the capacity to maintain their own residence requires assistance with deferred home repairs and maintenance, especially with costly major repairs such as roofs, HVAC systems and water heaters, as well as with necessary retrofits to accommodate ambulatory and other disabilities.

**Table II-26** below shows that although seniors are well represented within Section 8 and HCV, and are almost exclusive beneficiaries of Other Multifamily programs within the County, the numbers accommodated by these programs come nowhere near to meeting the need, as evinced by the numbers of seniors within poverty and by the numbers with disabilities. For example, the 42.47 percent of the total 8,155 Non R/ECAP tract units in the Housing Choice Voucher program within Riverside that are occupied by seniors amount to 3,463 units. Added to the other units available to seniors, the total of publicly supported housing units dedicated to seniors is 5,450. This number is far from adequate to meet the needs of the 20,210 elderly households in poverty or the 97,182 disabled elderly within Riverside.

**Table II-26  
Demographics by Publicly Supported Housing Program Category**

Riverside County	Total Occupied Units	White	Black	Hispanic	Asian or Pacific Islander	Families with children	Elderly	Disabled
<b>Public Housing</b>								
R/ECAP Tracts	N/A	N/A	0.00%	N/A	N/A	N/A	N/A	N/A
Non R/ECAP Tracts	N/A	N/A	0.00%	N/A	N/A	N/A	N/A	N/A
<b>Project-based Section 8</b>								
R/ECAP Tracts	211	3.85%	0.00%	96.15%	0.00%	64.15%	18.87%	4.25%
Non R/ECAP Tracts	2,149	26.48%	11.24%	58.28%	3.62%	47.59%	36.18%	9.84%
<b>Other Multifamily</b>								
R/ECAP Tracts	133	54.76%	14.29%	25.40%	3.97%	N/a	100%	5.34%
Non R/ECAP Tracts	916	41.71%	9.99%	33.15%	14.71%	0.64%	96.39%	4.35%
<b>HCV Program</b>								
R/ECAP Tracts	530	27.24%	42.07%	28.25%	2.24%	25.05%	28.80%	31.36%
Non R/ECAP Tracts	8,155	35.58%	36.37%	25.62%	1.98%	29.83%	42.47%	32.85%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH.

Note 3: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

For those elderly who are not home bound, the County of Riverside offers thirty (30) centers serving seniors and people with disabilities. Activities include a variety of social and recreational activities, including AARP meetings, Medicare and legal assistance; money management, legal and tax counseling (income tax assistance and will preparation); citizenship preparation, translation, and interpretation; assistance with applying for entitlements; recreational activities and arts and crafts; food pantry, homebound outreach, fitness classes, bingo, bridge, congregate lunch, Grandparents Raising Grandchildren, Care for the Caregiver, special events, and health and wellness fairs.

(<http://riverside.networkofcare.org/aging/services/subcategory.aspx?tax=TC-5500.8000>)

*People with Disabilities*

The Fair Housing Act prohibits housing discrimination against any person based on disability. The Americans with Disabilities Act defines a disability as a “physical or mental impairment that substantially limits one or more major life activities.” People with disabilities have special housing needs because of their fixed income, higher health costs, and need for accessible and affordable housing. According to 2017 ACS data, 11.44 percent of Riverside’s residents over the age of 5 years reported a physical disability.

**Table II-25** reveals that that the County of Riverside has 136,696 disabled residents ages 5 to 64, and another 97,182 elderly residents with disabilities. **Table II-27** below reveals the numbers living with each different type of disability within the community. The fact that the total exceeds the numbers of disabled reported in census and ACS data implies that individuals report multiple types of disability. According to **Table II-26**, the County’s Housing Choice Voucher program accommodates the highest number of disabled households, at 2,845 units, 199 of which are in R/ECAP tracts.

**Table II-27**  
**Disability by Type**

Disability Type	County of Riverside		(Riverside-San Bernardino-Ontario, CA) Region	
	#	%	#	%
Hearing difficulty	74,937	3.20%	125,033	3.20%
Vision difficulty	53,612	2.30%	86,934	2.23%
Cognitive difficulty	97,423	4.50%	170,114	4.36%
Ambulatory difficulty	142,174	6.50%	241,262	6.18%
Self-care difficulty	58,523	2.70%	102,841	2.63%
Independent living difficulty	99,446	5.80%	170,490	4.37%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Source: 2013-2017 ACS, S1810.

Note 3: Refer to the Data Documentation for details

(<http://www.hudexchange.info/resource/4848/affh-data-documentation>).

Note 4: The AFFH-T provides information on disability type, disability status by age group, and disability status by housing type. The disability type and disability status by age group measures are from the ACS, while the measure of persons with disabilities by housing type is from the PIC/TRACS data. These disability type categories in this table are based on a new set of disability questions introduced into the ACS in 2008 and are not comparable to disability type figures in prior years.

Apart from ADA compatible housing, both privately-owned and in the publicly-assisted

realm, persons with disabilities need accommodation in the form of County infrastructure, from sidewalks, curbs, and crossing signals, to ramps, restrooms and other features within public buildings, all of which are fundable through CDBG monies.

### *Family Status and Age*

According to the AFFH-T Data Documentation, “The Fair Housing Act prohibits housing discrimination against any person based on familial status. For purposes of the Fair Housing Act, familial status includes one or more individuals under the age of 18 being domiciled with a parent or other person with legal custody of such individuals. The AFFH-T provides information on families with children. Specifically, familial status is measured as the number and percentage of all families (with two or more related people in the household) that are families with children under age 18.”

As stated in **Table II-1**, Section B, families of all types continue to make up the vast share of the County’s population, though that share has diminished from a high of 74.4 percent in 2010 to current estimates of 73.4 percent. Although the jurisdiction is trending overall toward decreasing numbers of families with children in favor of married couples without children and non-family households, families with children still comprise 43.58 percent of family households within the jurisdiction. Meanwhile, Other Family households, consisting of a parent of either sex maintaining a household with no spouse present, have increased by 58.13 percent since 2000. The most current ACS data report 136,905 households within Riverside comprised of single parents with children under age 18, of whom 93,976, or 68.64 percent, are “Female householder(s), no husband present, family household(s).” This emerging demographic of single mothers within the jurisdiction will need special accommodation with regard to housing, because of gender pay gaps, the high cost of day care, and the propensity for histories of spousal abuse.

Families with children in general have special housing needs due to lower per capita income, the need for affordable childcare, the need for affordable housing, or the need for larger units with 3 or more bedrooms. According to the 2017 ACS data in **Table II-21** (Section D), the County had 129,419 large families. Large families often have difficulty finding adequately sized housing and may lease smaller units due to affordability concerns, which results in overcrowding. According to the data in **Table II-8** (Section C), approximately 35.16 percent of all families earned what would be considered low and moderate income for a family of 4, with roughly 14.4 percent falling into the extremely low-income category. **Table II-21** (Section E) shows that large families experience housing problems disproportionately, at 64.48 percent, vs. 49.38 percent of households generally. Families with children, and especially teenagers, may face discrimination in the rental housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex or unit, confine children to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether.

**Table II-28**  
**Publicly Supported Housing by Program Category:**  
**Units by Number of Bedrooms and Number of Children**

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing*	0	0%	0	0%	0	0%	0	0%
Project-Based Section 8	819	36.4%	801	35.6%	627	27.9%	1,100	48.9%
Other Multifamily	1,057	98.6%	14	1.3%	0	0%	6	0.56%
HCV Program	3,573	39.8%	3,028	33.7%	2,368	26.4%	2,828	31.5%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Note 1: Data Sources: APSH

Note 2: Refer to the Data Documentation for details (<http://www.hudexchange.info/resource/4848/affh-data-documentation>)

**Table II-28** above shows that 3,8432-Bedroom units and 2,995 3+-Bedroom units are available within subsidized housing programs within the County. Of these, 1,100, or 48.9 percent, of the County' project-based Section 8 units, and 2,828, or 31.5 percent of the County's HCVC program units are occupied by households with children. In total, 32.01 percent, or 3,934 units, of the 12,287 total publicly supported housing program units are occupied by families with children. Given the statistic referenced in the above paragraph placing the number of low/moderate-income families at 35.16 percent of 504,694, or 177,450 families, the numbers of available units in **Table II-28** appear inadequate.

#### *National Origin and Limited English Proficiency (LEP)*

According to HUD, "The Fair Housing Act also prohibits housing discrimination based on national origin." The data provided in the AFFH-T includes the ten most common places of birth of the foreign-born population by jurisdiction and region and the number and percentage of the population that is foreign-born. Also included are the ten most common languages spoken at home (for the population age 5 years and over) for those who speak English "less than 'very well,'" and the number and percentage of the population who speak English "less than 'very well.'" For space-saving purposes, only five out of the top ten places of birth and most common languages were included in **Table II-2** and **Table II-3** in Section B above.

According to the data in those tables, the largest foreign-born population within the jurisdiction and the region is from Mexico, making up 14.44 percent of Riverside's residents, slightly higher than the 13.95 regional percentage for this group. These foreign-born nationals include residents who have less than a fluent mastery of the English language, and

therefore need accommodation. Riverside residents with Limited English Proficiency are among the fastest growing population subgroup, having increased their numbers 165.75 percent from 122,105 in 1990 to 324,495 currently. As a percent of the population, their numbers have increased from 10.43 percent to 14.82 percent. Given that four of the five most prevalent primary languages are Asian, namely Tagalog, Chinese, Vietnamese, and Korean, the availability of online and printed materials and foreign language interpreters in these languages, in addition to Spanish, should be common practice within County agencies involved in delivery of affordable housing and other services to these communities.

*Homeless Persons*

Housing affordability for those who are homeless or who are formerly homeless is challenging from an economics standpoint, and this demographic group may also encounter fair housing issues when landlords refuse to rent to formerly homeless persons due to poor credit history. These difficulties are more severe for homeless families that need larger affordable units. The County of Riverside manages a range of coordinated efforts and engages active collaboration among community organizations, churches, service clubs, and concerned citizens dedicated to overcoming homelessness in conducting its annual Point-in-Time (PIT) Count survey. According to the County of Riverside Department of Public Social Services (DPSS), 1,685 individuals in Riverside were unsheltered homeless in 2018, in addition to 631 individuals who were sheltered homeless. **Table II-29** below contains data from the latest Point-in-Time Count Report by Riverside County.

**Table II-29  
Unsheltered and Sheltered Homeless Persons (2016-2018)**

	2016		2017		2018	
	Count	Percent	Count	Percent	Count	Percent
Sheltered	814	37.60%	768	31.90%	631	27.20%
Unsheltered	1351	62.40%	1638	68.10%	1685	72.80%
Total:	2165		2406		2316	

Source: 2018 Riverside County Point-in-Time Homeless Count Report.

The report attributes the decrease in the 2018 Sheltered PIT Count from 2017 Count to "the decrease in the number of homeless people staying in emergency shelter (ES) or transitional housing (TH) on the night of the PIT Count." (p. 12)

The report also suggests that the supply of County shelter beds is underutilized. **Table II-30** below breaks down the total number of sheltered individuals compared to the total number of available beds for each housing type in 2017 and 2018. According to the report, "the total number of available beds increased by more than one percent (1.56 percent) from 2017 (834 beds) to 2018 (847 beds). However, the sheltered PIT Count number decreased by

almost eighteen percent (17.8 percent) from seven hundred sixty-eight (768) in 2017 to six hundred thirty-one (631) in 2018, indicating that the decrease in the sheltered count was most likely due to a lower bed utilization." (p. 12)

**Table II-30  
Sheltered Homeless Persons - Available Beds versus Count (2017-2018)**

	2017			2018			Difference		
	Beds Available	PIT Count	Average Utilization Rate	Beds Available	PIT Count	Average Utilization Rate	Beds	PIT	Utilization
Emergency Shelter	614	587	95.60%	667	532	79.76%	53	-55	-15.8%
Transitional	220	181	82.27%	180	99	55.00%	-40	-82	-27.3%
Sheltered	834	768	177.88%	847	631	134.76%	13	-137	-43.1%

Source: Riverside County 2018 Point-in-Time Homeless County Report.

Although emergency and transitional shelter services will always be essential components of homelessness strategies, mitigating or eliminating homelessness will depend on a community's ability to implement permanent housing solutions with supportive services that help formerly homeless individuals overcome any number of factors contributing to their situation. "Permanent supportive housing" is the term of art within the social services sector that describes an affordable living environment that offers the ongoing case management, linkage to care, employment counseling, ongoing job skills training, transportation services, and even financial counseling that this special needs group requires to stay housed and productive. Without such support, their risks of remaining homeless or returning to homelessness in a chronic manner are great.

Homelessness occurs for varied reasons and requires different resources and services for each homeless individual. Serving the needs of this population is complex. Addressing homelessness requires effective strategies to reduce the number of families and individuals who become homeless, in addition to helping currently homeless families and individuals move into permanent housing. The following is excerpted from the County's report, entitled "Ending Homelessness in Riverside County," published in 2017:

“The Executive Oversight Committee on Homelessness (EOCH)--with the support of staff from numerous county agencies, cities, and community-based organizations--has developed an action plan to address homelessness by applying evidence-based strategies and best practices to effectively meet the needs of specific geographic areas and sub- populations. The action plan is intended to be a living document that requires ongoing development and updates based on the changing environment, community demands, and emerging opportunities. The action plan focuses on three primary goals

for addressing homelessness in the following Riverside County populations: youth, veterans, families, and chronically homeless individuals and families.

- Goal 1 – Prevent homelessness among individuals and families at-risk of becoming homeless. Design and implement a coordinated prevention system to provide limited cash assistance, a wide range of free or low-cost supportive services, and/or supplies to those most likely to become homeless.
- Goal 2 – End homelessness of single individuals and families who are living on the streets and in shelter and transitional housing programs. Design and implement a coordinated system of evidence-based Housing First, low barrier, and rapid rehousing (RRH) approaches to obtaining and maintaining housing of specified subpopulations in geographic areas with the greatest need.
- Goal 3 – Ensure funding for a coordinated system to end and prevent homelessness among individuals and families. Identify a wide range of public and private funding opportunities to carry out the design and implementation of the coordinated system to prevent and end homelessness.

To achieve these three goals, the action plan calls for the implementation of four primary strategies, listed below, and establishes 23 recommendations.

- Strategy 1 - Improve System Coordination
- Strategy 2 - Increase Housing Resources
- Strategy 3 - Increase Outreach & Navigation
- Strategy 4 - Increase Supportive Services”

The Homeless Programs Unit of the County of Riverside Department of Public Social Services manages the countywide Continuum of Care. The Continuum of Care organizes and delivers supportive social services and housing options that meet the specific needs of homeless individuals and families. According to the Department "the ultimate goal of the Continuum is to move homeless people toward stable housing and maximum self-sufficiency. Programs include the Emergency Food & Shelter Program (EFSP), Homeless Management Information System (HMIS), and Housing and Urban Development Supportive Housing Program (HUD SHP).

Equal access and choice in housing, or what is commonly known as fair housing opportunity, is covered by federal and State statutes, regulations, and court decisions that prohibit discrimination in the rental, sale, negotiation, advertisement, or occupancy of housing on the basis of one or more protected classes. The twin goals of nondiscrimination and integration in housing are achieved through the actions of buyers, sellers, landlords, tenants, realtors, apartment associations, homeowner associations, condominium boards, insurers, builders, lenders, appraisers, home inspectors, cities, community benefit organizations, and the courts. This chapter provides an overview of the private sector housing industry in the County of Riverside and its interrelationship with fair housing services.

### **A. Owner-Occupied Housing**

Part of the American dream involves owning a home in a good neighborhood near good schools, parks, shopping centers, jobs, transportation, and other community amenities. Homeownership strengthens individual households and entire neighborhoods because owner-occupants have made an investment in their own personal property as well as the neighborhood and community. This fosters a greater sense of pride in the appearance and condition of not only the home but of the neighborhood as well. It also promotes owner involvement in the community because owner-occupants have a personal stake in the area and tend to be more active in decisions affecting the community. Fair housing opportunity laws protect an individual or family's right to occupy the housing of their choice that they can afford. Ensuring fair housing is an important way to not only preserve but to improve the housing opportunities for all residents of Riverside County.

#### *Home Buying Process*

Purchasing a home presents many challenges to the would-be owner. One of the main challenges in buying a home is the process by which an individual or family must acquire the property. The time required to find a home, the major legal and financial implications surrounding the process, the number of steps required and financial issues to be considered can be overwhelming to many home buyers. Throughout this time-consuming and costly process, fair housing issues can surface in many ways. Discriminatory practices in the home buying process can occur through the:

- Advertisement of homes for sale;
- Lending process;
- Appraisal process;
- Actions of real estate agents and sellers; and
- The issuance of insurance.

### *Advertising*

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

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

- Suggest a preferred type of buyer or tenant household, e.g. “perfect for a young couple”;
- Use models that indicate a preference or exclusion of a type of resident, e.g. running a series of advertisements that only include photos of nuclear families, or that do not features persons of color or persons with disabilities;
- Publish advertisements or listings in certain languages, e.g. only advertising homes/apartment complexes in predominately Hispanic neighborhoods on Spanish-language radio stations;
- Restrict publication to certain types of media or locations so as to indicate a preference.

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

### *Lending*

Initially, buyers must locate a lender who will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide sensitive information including their gender, ethnicity, income level, age, and familial status. This information is required to be gathered by the Community Reinvestment Act and the Home Mortgage Disclosure Act; however, it does not guarantee that individual loan officers or underwriters will not misuse the information.

A report on mortgage lending discrimination by the Urban Land Institute describes four basic stages in which discrimination can occur:

- **Advertising/outreach stage.** Lenders may not have branches in certain locations, not advertise to certain segments of the population, or violate advertising rules with respect to fair housing.
- **Pre-application stage.** Lenders may not provide applicants of different racial and ethnic backgrounds the same types of information as other preferred groups, or may urge some to seek another lender.
- **Lending stage.** Lenders may treat equally qualified individuals in a different manner, giving different loan terms, preferred rates, or denying a loan based on a factor not related to ability to pay and risk.
- **Loan administration.** Lenders may treat minorities in harsher terms, such as initiating foreclosure proceedings if any payment is late, or by making loans at terms that encourage defaults.

### *Appraisals*

Banks order appraisal reports to determine whether or not a property is worth the amount of the loan requested. Generally, appraisals are based on sale prices of comparable properties in the surrounding neighborhood of the subject property. Other factors such as the age of the structure, improvements made and location are also considered. Homes in some neighborhoods with higher concentrations of minorities and poverty concentrations may appraise lower than properties of similar size and quality in neighborhoods with lower concentrations of minorities or low-income households.

Taking these factors into consideration when valuing a property in an appraisal causes the arbitrary lowering of property values and restricts the amount of equity and capital available to not only the potential home buyer but also to the current owners in the neighborhood. Disparate treatment in appraisals is difficult to prove since individual appraisers have the latitude within the generally accepted appraisal practices to influence the outcome of the appraisal by factoring in subjective opinions.

### *Real Estate Agents*

Finding a real estate agent is normally the next step in the home buying process. The agent will find the home for the prospective buyer that best fits their needs, desires, and budget based on the amount they are qualified for by the lender. Real estate agents may also intentionally or unintentionally discriminate by steering a potential buyer to particular neighborhoods, by encouraging the buyer to look into certain areas or failing to show the buyer all choices available. Agents may also discriminate by who they agree to represent, who they turn away and the comments they make about their clients.

### *Sellers*

Even if a real estate agent is following fair housing practices, the current occupant (seller) may not want to sell his or her home to certain purchasers protected under fair housing laws or they may want to accept offers only from a preferred group. Oftentimes, sellers are present when agents show properties to potential buyers and sellers may develop certain biases based upon this contact. The Residential Listing Agreement and Seller's Advisory forms that sellers must sign disclose their understanding of fair housing laws and practices of discrimination. However, preventing this type of discrimination is difficult because a seller may have multiple offers and choose one based on bias.

### *Insurance*

Insurance agents have underwriting guidelines that determine whether a company will sell insurance to a particular applicant. Currently, underwriting guidelines are not public information; however, consumers have begun to seek access to these underwriting guidelines to learn if certain companies have discriminatory policies, called redlining. Some states require companies to file the underwriting guidelines with the State Department of Insurance, making the information public.

Many insurance companies have traditionally applied strict guidelines, such as not insuring older homes, that disproportionately affect lower income and minority households that can only afford to buy homes in older neighborhoods. A California Department of Insurance (CDI) survey found that less than one percent of the homeowner's insurance available in California is currently offered free from tight restrictions. The CDI has also found that many urban areas are underserved by insurance agencies.

### *Home Loan Activity*

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

In tandem with the Home Mortgage Disclosure Act (HMDA), financial institutions with assets exceeding \$10 million are required to submit detailed information on the disposition of home loans by applicant characteristics. HMDA data can then be evaluated with respect to lending patterns.

During Calendar Year 2017, 7,268 households filed loan applications for housing they

owned and occupied or intended to own and occupy in Riverside County. Of those applications, 1,523 were withdrawn before approval or denial and 505 were closed for incompleteness prior to a decision. Lending institutions rendered decisions on 5,240 loan applications.

The data in **Table III-1** shows that the number of loan applications for owner-occupied housing for which a decision was rendered is highest for refinancing at 49.43 percent of all loan applications, followed by loans for home purchase at 40.80 percent of the total loan applications, and a mere 9.77 percent of all loans for home improvement. Approval rates were greatest for loans for home purchase at 75.26 percent and lowest for home improvement and refinancing with a 41.99 percent approval rate. The conventional loan type was most common for all loan purposes. The average loan approval rate for all loan types and loan purposes was 62.65 percent.

**Table III-1**  
**Home Loan Application Activity in Riverside County**

Type	Number of Loans	Share of Loans	Number Approved	Approval Rate
<b>Home Purchase</b>	<b>2,138</b>	<b>40.80%</b>	<b>1,609</b>	<b>75.26%</b>
Conventional	1,143	21.81%	827	72.35%
FHA - Insured	646	12.33%	507	78.48%
VA - Guaranteed	340	6.49%	270	79.41%
FSA/RHS	9	0.17%	5	55.56%
<b>Home Improvement</b>	<b>512</b>	<b>9.77%</b>	<b>215</b>	<b>41.99%</b>
Conventional	450	8.59%	181	40.22%
FHA - Insured	31	0.59%	16	51.61%
VA - Guaranteed	31	0.59%	18	58.06%
FSA/RHS	0	0.00%	0	0.00%
<b>Refinancing</b>	<b>2,590</b>	<b>49.43%</b>	<b>1,459</b>	<b>56.33%</b>
Conventional	1,534	29.27%	836	54.50%
FHA - Insured	553	10.55%	318	57.50%
VA - Guaranteed	503	9.60%	305	60.64%
FSA/RHS	0	0.00%	0	0.00%
<b>Total:</b>	<b>5,240</b>	<b>100.00%</b>	<b>3,283</b>	<b>62.65%</b>

Source: Consumer Financial Protection Bureau, HMDA Database, 2017.

*Mortgage Interest Rates & Fees*

A key component to securing a home loan is the interest rate and fees associated with the loan. In July 2015, *The Journal of Real Estate Finance and Economics*<sup>1</sup> published an article

<sup>1</sup> Cheng, Ping, Lin, Zhenguo, Liu, Yingchun, "Racial Discrepancy in Mortgage Interest Rates," *The Journal of Real Estate Finance and Economics*, Vol. 51, p. 101-120 (July 2015)

authored by Ping Cheng, Zhenguo Lin, and Yingchun Lin that analyzed the “Racial Discrepancy in Mortgage Interest Rates.” Rather than focusing on racial discrimination in loan origination, they chose to focus on whether black applicants were more likely to be charged higher interest rates than their white counterparts.

The authors of this study considered a number of variables, including: race, when the mortgage was originated, type of loan (ARM or fixed), loan-to-value ratios, whether the loan was purchase-money or refinance, debt-to-income ratios of the borrowers, net wealth, liquid worth, whether the borrower had been rejected on a credit application in the last five years, whether the borrower had ever filed for bankruptcy, age of the household head at time of application, education level of borrower, and shopping behavior (whether borrower searched for a lender or relied on a referral from a friend or family member).

According to the authors, the statistics they used suggested clear differences between black and white borrowers in almost every respect. However, when accounting for these differences, the researchers found that “black borrowers on average pay about 29 basis points more than comparable white borrowers.”

Additionally, even amongst African-American borrowers, there is disparity based on sex. “The results suggest that, while the racial disparity in mortgage rates is widespread between black and white borrowers, it is the more financially vulnerable black women who suffer the most. The excessive premium this group of women must pay for long term credit is almost certainly going to put them into even more vulnerable financial conditions in the long run.”

### *Lending Outcomes*

This section summarizes lending activity in Riverside County during calendar year 2017 – the most recent available dataset from the Consumer Financial Protection Bureau (CFPB) and the Federal Financial Institutions Examination Council (FFIEC). HMDA data provides some insights regarding the lending patterns in a community. However, the HMDA data is only an indicator of potential problems; it cannot be used to conclude discrimination due to the limitations of the data.

***Lending Outcomes by Income and Race/Ethnicity.*** Generally, home loan approval rates increase as household income increases. This was true for each type of loan analyzed in Riverside County. **Table III-2** shows loan approval rates for home purchases, home improvement loans and refinance loans by income level and by ethnicity/race. The income levels represented include low- and moderate income (less than 80 percent of MFI - applicants earning \$51,000 or less), middle income (between 80 percent and 120 percent of MFI - \$51,001 - \$76,000), and upper income (over 120 percent of MFI - \$76,001 and up). There were 525 loan applications for which income information of the applicant was not available. Those loans are not represented on **Table III-2**.

**Table III-2  
Home Loan Approval Rates by Applicant Characteristics**

Type	Low/Mod Income <80% MFI		Middle Income 80-120% MFI		Upper Income 120+ MFI		
	Race/ Ethnicity	Loan Applications	Approval Rate	Loan Applications	Approval Rate	Loan Applications	Approval Rate
<b>Home Purchase</b>		<b>320</b>	<b>65.31%</b>	<b>536</b>	<b>74.25%</b>	<b>1142</b>	<b>75.57%</b>
Hispanic		121	66.94%	177	68.36%	203	72.41%
White		89	57.30%	154	67.53%	430	68.37%
Asian		17	64.71%	25	72.00%	54	66.67%
African American		11	63.64%	44	79.55%	80	66.25%
All Others		6	66.67%	5	80.00%	33	72.73%
Decline or N/A		76	72.37%	131	88.55%	342	90.35%
<b>Home Improvement</b>		<b>122</b>	<b>22.95%</b>	<b>116</b>	<b>37.93%</b>	<b>269</b>	<b>52.04%</b>
Hispanic		41	21.95%	43	32.56%	50	62.00%
White		44	20.45%	38	34.21%	104	36.54%
Asian		4	25.00%	2	0.00%	13	30.77%
African American		6	16.67%	12	58.33%	19	63.16%
All Others		2	50.00%	3	66.67%	11	81.82%
Decline or N/A		25	28.00%	18	44.44%	72	63.89%
<b>Home Refinance</b>		<b>525</b>	<b>40.57%</b>	<b>535</b>	<b>54.02%</b>	<b>1150</b>	<b>57.13%</b>
Hispanic		191	32.46%	136	50.00%	169	49.70%
White		161	32.92%	185	38.92%	428	45.56%
Asian		17	35.29%	14	57.14%	43	51.16%
African American		22	31.82%	26	53.85%	60	43.33%
All Others		8	62.50%	5	60.00%	28	50.00%
Decline or N/A		126	63.49%	169	73.37%	422	74.88%

Source: Consumer Financial Protection Bureau, HMDA Database, 2017.

While it is irresponsible to ascribe discriminatory intent from the loan data presented, review of the 54 combinations of loan type, applicant income level, and race/ethnicity evaluated revealed only six instances where a racial or ethnic group had a loan approval rate that was disproportionately lower than the group as a whole. Disproportionately lower is defined as being 10 percentage points or more below the approval rate of the group. The six instances of disproportionately lower approval ratings included:

- Middle Income Asian Home Improvement Loans – 0 percent approval rate vs. 37.93 percent group approval rate
- Middle Income White Home Refinance Loans – 38.92 percent approval rate vs. 54.02 percent group approval rate

- Upper Income White Home Improvement Loans – 36.54 percent approval rate vs. 52.04 percent group approval rate
- Upper Income Asian Home Improvement Loans – 30.77 percent approval rate vs. 52.04 percent group approval rate
- Upper Income White Home Refinance Loans – 45.56 percent approval rate vs. 57.13 percent group approval rate
- Upper Income African American Refinance Loans – 43.33 percent approval rate vs. 57.13 percent group approval rate

Three out of six of the occurrences of disproportionately lower approval rates occurred for White applicants. The remaining occurrences included a total of two middle income Asian applicants for home improvement loans, thirteen upper income Asian applicants for home improvement loans, and 60 upper income African American applicants for home refinance loans.

Differences in approval rates for home loan applications among minorities do not necessarily reflect discriminatory practices. Differences could be due to credit scores, employment history, knowledge of the lending process, debt-income ratio, or other factors. Nonetheless, the instances where minorities experience disproportionately lower loan approval rates are noteworthy and merit additional inquiry and examination.

***Lending Outcomes by Tract Characteristics.*** Analyzing lending patterns by neighborhood characteristics can show whether significantly fewer home loans are being approved or issued in low/moderate income neighborhoods or neighborhoods with a disproportionately high percentage of minority residents. The lack of lending activity in one or more neighborhoods has been linked to unequal access to credit among different race and ethnic groups and alleged practices of redlining and discrimination.

**Table III-3** on the following page shows a comparison of home purchase and refinance loan approval rates at the census tract level by the minority concentration in the tract as well as tract income level relative to the Area Median Income. Home purchase and home refinance loan applications for properties located in predominately minority census tracts had lower approval ratings than loan applications for properties located in census tracts that were not majority minority; however, the difference in approval rates was not disproportionately lower than the overall approval rate for each respective type of loan. Similarly, home purchase and home refinance loan applications for properties located in predominately low-income census tracts experienced somewhat lower approval rates than loan applications for properties located in middle and upper income census tracts; however, the differences were well within 10 percentage points, suggesting that the location of the property for which the loan is being taken out is not disproportionately impacting the loan outcome.

**Table III-3**  
**Home Loan Approval Rates by Tract Characteristics**

Tract Characteristics	Home Purchase Loans			Home Refinance Loans		
	Number of Applications	Number Approved	Percent Approved	Number of Applications	Number Approved	Percent Approved
<b>Minority Percentage</b>						
20% to 50%	1,066	819	76.83%	1,236	707	57.20%
50% to 80%	900	670	74.44%	1,077	592	54.97%
80% +	172	120	69.77%	277	137	49.46%
<b>Tract Income</b>						
Low	430	306	71.16%	462	234	50.65%
Middle	819	632	77.17%	1,057	606	57.33%
Upper	889	671	75.48%	1,071	596	55.65%

Source: Consumer Financial Protection Bureau, HMDA Database, 2017.

### *Predatory Lending*

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

The Fair Housing Act of 1968 prohibits discrimination in the making or purchasing of loans, or in providing of other financial assistance, or the terms and conditions of such financial assistance for the purpose of purchasing, constructing, improving, repairing, or maintaining a dwelling because of race, religion, color, national origin, sex, family status, or disability. The Equal Credit Opportunity Act of 1972 also requires equal treatment in loan terms and availability of credit for all of the above categories, as well as age and marital status. Lenders would be in violation of these acts, if they target minority or elderly households to buy higher-priced loan products, treat loans for protected classes differently, or have policies or practices that have a disproportionate effect on the protected classes.

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

the borrower's home and the borrower could lose the home if they default on the loan payment.

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

### *Foreclosures*

Foreclosure occurs when homeowners fall behind on one or more scheduled mortgage payments. The foreclosure process can be halted if the homeowner is able to bring their mortgage payments current or if the homeowner sells their home and pays the mortgage off. However, if regular payments cannot be resumed or the debt cannot be resolved, the lender can legally use the foreclosure process to repossess (take over) the home. When this happens, the homeowner must move out of the property. If the home is worth less than the total amount owed on the mortgage loan, a deficiency judgment could be pursued. If that happens, the homeowner would lose their home and also would owe the home lender an additional amount.

In the late-2000s the number of foreclosed homes in California hit an all-time high. The problem was so severe in its consequences that numerous factors have been attributed for the high incidence of foreclosure, including but not limited to abnormally high housing prices in the early part of the decade, the origination of sub-prime loans to unqualified buyers, the economic recession and job losses. This confluence of negative economic incidents left most housing markets in the United States in severe decline with historically high rates of foreclosure. Property values declined significantly—in some cases to pre-2000 levels.

Southern California and Riverside County, in particular, were characterized by a high percentage of foreclosed homes as many homeowners were unable to keep up with payments. The high foreclosure rate prompted Congress to create the Neighborhood Stabilization Program (NSP), which is administered by the U.S. Department of Housing and Urban Development (HUD) to purchase abandoned and foreclosed properties in an effort to stabilize local housing markets that have been targeted for their high risk of foreclosure. The NSP provided grants to every state and certain local communities to purchase foreclosed or abandoned homes and to rehabilitate, resell, or redevelop these homes in order to stabilize neighborhoods and stem the decline of house values of neighboring

homes. The program was authorized under Title III of the Housing and Economic Recovery Act of 2008.

The high incidence of foreclosure and the housing crisis in general represented a system-wide collapse of the housing market that resulted in numerous national, state and local efforts to reform virtually every aspect of housing acquisition and finance.

Several years have now passed since the foreclosure crisis began, and the housing market is beginning to rebound thanks in part to those efforts. ATTOM Data Solutions recently announced its Fiscal Year 2018, 3<sup>rd</sup> Quarter numbers, which show that foreclosure filings are down 6 percent from the previous quarter, down 8 percent from the third quarter last year, and were at their lowest levels since the fourth quarter of Fiscal Year 2005.<sup>2</sup> Not only are foreclosure filings down for the last quarter, foreclosure filings have been below the pre-recession average for eight consecutive quarters. However, that same report indicates that there is still a relatively modest, but widespread, foreclosure risk associated with FHA loans originated in 2014 and 2015, exceeding the long-term average foreclosure rates for all FHA loans. Overall, the housing market seems to have recovered from the recent crisis.

#### *Agency Coordination*

Many agencies are involved in overseeing real estate industry practices and the practices of the agents involved. A portion of this oversight involves ensuring that fair housing laws are understood and complied with. The following organizations have limited oversight within the real estate market, and some of their policies, practices, and programs are described.

**National Association of Realtors (NAR).** The National Association of Realtors (NAR) is a consortium of realtors which represent the real estate industry at the local, state, and national level. As a trade association, members receive a range of membership benefits. However, in order to become a member, NAR members must subscribe to its Code of Ethics and a Model Affirmative Fair Housing Marketing Plan developed by HUD. The term Realtor thus identifies a licensed real estate professional who pledges to conduct business in keeping with the spirit and letter of the Code of Ethics.

Realtors subscribe the NAR's Code of Ethics, which imposes obligations upon Realtors regarding their active support for equal housing opportunity. Article 10 of the NAR Code of Ethics provides that "Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin." Realtors shall not print, display or circulate any statement or advertisement with respect to the selling or renting of a property that indicates any preference, limitations or

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<sup>2</sup> <https://www.attomdata.com/news/market-trends/foreclosures/foreclosure-market-report-q3-2018/> retrieved October 19, 2018.

discrimination based on race, color, religion, sex, handicap, familial status, or national origin.”

The NAR has created a diversity certification, “At Home with Diversity: One America” to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR “At Home with Diversity” course. The certification signals to customers that the real estate professional has been trained on working with the diversity of today’s real estate markets. The coursework provides valuable business planning tools to assist real estate professionals in reaching out and marketing to a diverse housing market. The NAR course focuses on diversity awareness, building cross-cultural skills, and developing a business diversity plan. In July 1999, the NAR Diversity Program received the HUD “Best Practices” award.

**California Association of Realtors (CAR).** The California Association of Realtors (CAR) is a trade association of 92,000 realtors statewide. As members of CAR, Realtors subscribe to a strict code of ethics. CAR has recently created the position of Equal Opportunity/Cultural Diversity Coordinator. CAR holds three meetings per year for its general membership, and meetings typically include sessions on fair housing issues. They also maintain fair housing and ethics information on their website. The website address is as follows: <http://www.dre.ca.gov/>. The licensure status of individual agents can be reviewed at the following site: [http://www.dre.ca.gov/licensees\\_sub.htm](http://www.dre.ca.gov/licensees_sub.htm). This web site includes any complaints or disciplinary action against the agent.

**California Department of Real Estate (DRE).** The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons. DRE has adopted education requirements that include courses in ethics and fair housing. To renew a real estate license, each licensee is required to complete 45 hours of continuing education, including three hours in each of the four mandated areas: Agency, Ethics, Trust Fund, and Fair Housing. The fair housing course contains information that enables an agent to identify and avoid discriminatory practices when providing real estate services.

DRE investigates written complaints received from the public alleging possible violations of the Real Estate Law or the Subdivided Lands Law by licensees or subdividers. DRE also monitors real estate licensees conducting business as mortgage lenders and mortgage brokers. If an inquiry substantiates a violation, DRE may suspend or revoke a license, issue a restricted license, or file an Order to Desist and Refrain. Violations may result in civil injunctions, criminal prosecutions, or substantial fines. The Department publishes monthly a list of names of persons and businesses which have been conducting real estate activities without a license.

DRE reviews Covenants, Conditions, and Restrictions (CC&R’s) for all subdivisions of five or more lots, or condominiums of five or more units. The review includes a wide range of issues, including compliance with fair housing law. CC&R’s are restrictive covenants that

involve voluntary agreements, which run with the land they are associated with. In the past, CC&R's were used to exclude minorities from equal access to housing. DRE reviews CC&R's and they must be approved before issuing a final subdivision public report. This report is required before a real estate broker or anyone can sell the units, and each prospective buyer must be issued a copy of the report.

**The California Organized Investment Network (COIN).** COIN is a collaboration of the California Department of Insurance, the insurance industry, community economic development organizations, and community advocates. This collaboration was formed in 1996 at the request of the insurance industry as an alternative to state legislation that would have required insurance companies to invest in underserved communities, similar to the federal Community Reinvestment Act (CRA) that applies to the banking industry. COIN is a voluntary program that facilitates insurance industry investments providing profitable returns to investors and economic/social benefits to underserved communities.

## **B. Rental Housing**

Similar to the owner-occupied market, a major challenge to ensuring fair housing in the rental market is the complexity of the process. Stages in the process of renting a home include advertising, pre-application inquiries, viewing the apartment, criteria for qualifying for the lease, lease conditions, and administration of the lease. The process becomes even more difficult and subjective in a tight rental market, where the landlord has numerous options for choosing the future tenant based on subjective factors.

### *The Rental Process*

While the process of renting an apartment or home may be less expensive and burdensome up front than the home-buying process, it may still be just as time-consuming and potential renters may still face discrimination during various stages of the rental process. Some of the more notable ways in which tenants may face discriminatory treatment are highlighted below.

### *Advertising*

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

Discriminatory advertising can be one of the most insidious forms of discrimination based on its widespread dissemination. Marketing is typically broad-based, reaching many people, and as such, can have a chilling effect on the market. This is also particularly true when the discrimination is unintentional or subconscious. Landlords who may never discriminate knowingly against a minority applicant may not be contacted by minority potential renters due to unconscious signaling in the advertisements. This is why, even though there are exceptions in the Fair Housing Act for when it applies, there is no similar exception when it comes to the advertising rules.

### *Viewing the Unit*

Viewing the unit is the most obvious, or overt, place where potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, judge on appearance whether a potential renter is reliable or may violate any rules, or make any other subjective judgments. For example, if a student is wearing a T-shirt with a rap artist on the front, a landlord may suspect that the renter could play loud music disturbing to other tenants. If a prospective tenant arrives with many children, the landlord may be concerned that the children may disturb other renters. In addition, the prospective tenant may also have an accent or wear religious symbols or jewelry which may again play into the decision to rent the unit. The opportunity for the potential renter to view the unit, is also an opportunity for the landlord to view the potential tenant and make value judgments based on their appearance or personal characteristics.

### *Qualifying for the Lease*

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history and salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent a home. An initial payment consisting of first and last months' rent and security deposit are typically required. To deter "less-than-desirable" tenants, a landlord may ask for an initial payment or security deposit higher than for others. Tenants may also face differential treatment when vacating the unit. The landlord may choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear.

Because the rental market is getting tighter, with more applicants for every available unit than ever before, landlords who wish to do so have more cover when discriminating when choosing whom to rent to. Because there are more applicants, there are more qualified applicants, and the potential for discrimination arises when the landlord must decide between multiple qualified candidates of different demographics.

### *The Lease*

Most apartments are rented under either a lease agreement or a month-to-month rental agreement, both of which have advantages and disadvantages for both landlords and tenants. Some tenants see a lease as more favorable for two reasons: the tenant is assured the right to live there for a specific period of time and the tenant has an established rent during that period. However, some tenants prefer the flexibility that a month-to-month tenancy provides. The lease agreement usually includes the rental rate, required deposit, length of occupancy, apartment rules, and termination requirements, and there are rights and responsibilities on both sides of the contract. Typically, the rental agreement is a standard form for all units in the same building. However, enforcement of rules contained in the lease agreement may not be standard. A landlord may choose to strictly enforce rules for certain tenants based on their race/ethnicity, children, or a disability – raising fair housing concerns.

### *Rental Housing Services*

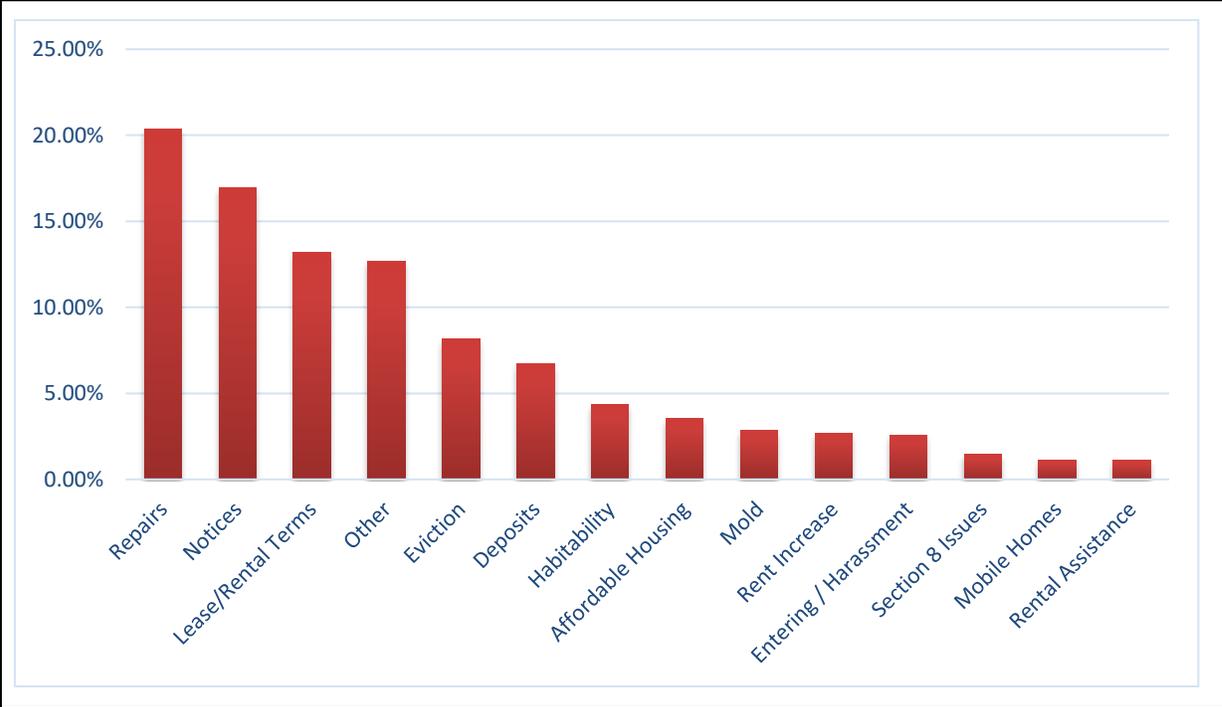
The County of Riverside has contracted with the Fair Housing Council of Riverside County (FHCRC) to provide fair housing and related services. Established in 1986, FHCRC is a private, non-profit and community-based organization which implements the following fair housing programs for communities throughout Riverside County:

- **Fair Housing (Anti-Discrimination) Services:** Provide educational workshops, outreach to the community, and investigation of discrimination complaints from residents. Residents who feel they have been discriminated against in securing or maintaining housing are encouraged to contact FHCRC at (951) 682-6581, to reach out via email at [fhcrc@fairhousing.net](mailto:fhcrc@fairhousing.net). Complainants are ultimately provided with fair housing education, counseling, referral to the State Department of Fair Employment and Housing (DFEH), HUD or a private attorney.
- **Landlord-Tenant Services:** Services including education, counseling, and mediation to both landlords and tenants to resolve disputes concerning a host of common issues impacting the business relationship between tenants and landlords. Common issues to be addressed in this category of service include eviction, occupancy standards, repairs, deposits, lease/rental terms, rental assistance, rent increases, habitability and notices.
- **Housing Counseling Services:** Pre-purchase workshops, mortgage delinquency and default resolution counseling, pre-purchase counseling, rental housing counseling and services for homeless counseling or referrals.
- **Training for Real Estate Professionals:** Training workshops for landlords, managers and owners in the following areas: Landlord/Tenant issues, First-Time Homebuyer, Foreclosure Prevention, and Fair Housing Laws.

During the five-year period extending from July 1, 2013 to June 30, 2018, FHCRC assisted

140,045 rental housing residents throughout Riverside County with the resolution of a wide variety of landlord/tenant issues. **Table III-4** on the following page includes a five-year tabulation of the 55,893 landlord-tenant related inquiries received by FHCRC. **Graph III-1** below shows that the top five inquiry categories affecting the most Riverside County residents who reached out to FHCRC included repairs (20.34 percent), notices (16.96 percent), lease/rental terms (13.2 percent), other (12.66 percent) and eviction (8.18 percent). It is important to note that any resident in FHCRC’s service area can utilize their services and expertise to navigate the complex laws facing landlords, managers and tenants in the rental housing market. It is common for landlords, managers and tenants to take inappropriate actions against other parties due to lack of knowledge about laws affecting tenancy in rental housing. Oftentimes, such disputes are resolved merely through education, and do not require the parties to file a lawsuit, or file formal complaints with regulatory agencies, to enforce their rights.

**Graph III-1  
Landlord-Tenant Inquiries (Rental)**



Source: FHCRC Quarterly Reports, July 1, 2013 – June 30, 2018.

**Table III-4  
Landlord-Tenant Inquiries (Rental)**

Inquiry Category	City of Riverside	City of Corona	City of Moreno Valley	City of Perris	City of Menifee	City of Hemet	City of Temecula	West County	East County	City of Palm Springs	City of Palm Desert	5-Year Total	5-Year %
Repairs	8,153	1,583	3,800	1,495	505	4,423	495	4,550	2,261	828	391	28,484	20.34%
Notices	7,893	1,522	3,547	1,634	510	2,193	440	3,198	1,859	705	246	23,747	16.96%
Lease/Rental Terms	6,133	1,279	2,613	1,013	397	1,651	539	2,383	1,357	863	258	18,486	13.20%
Other	6,422	1,049	2,286	924	335	1,975	414	2,328	1,239	576	177	17,725	12.66%
Eviction	3,663	631	1,719	686	189	1,206	170	1,507	1,031	541	112	11,455	8.18%
Deposits	2,809	683	1,323	479	314	955	354	1,529	630	256	96	9,428	6.73%
Habitability	1,467	263	827	314	94	946	93	836	880	264	77	6,061	4.33%
Affordable Housing	1,073	129	1,984	374	111	238	61	424	260	238	41	4,933	3.52%
Mold	800	215	606	215	100	614	145	721	386	95	68	3,965	2.83%
Rent Increase	1,195	294	552	254	50	381	91	380	312	149	103	3,761	2.69%
Entering / Harassment	1,304	319	362	150	44	374	94	416	363	149	47	3,622	2.59%
Section 8 Issues	729	48	381	142	21	236	28	256	102	81	17	2,041	1.46%
Mobile Homes	315	134	42	76	36	274	7	335	321	49	8	1,597	1.14%
Rental Assistance	425	47	592	105	17	113	35	157	51	36	4	1,582	1.13%
Occupancy Standards	233	47	334	50	18	142	44	116	88	45	17	1,134	0.81%
Homeless Assistance Referrals	380	26	297	61	9	106	15	28	62	65	4	1,053	0.75%
Late Fees	145	39	100	28	1	60	3	74	30	11	3	494	0.35%
Foreclosure Issue	103	39	42	52	7	13	6	113	32	38	5	450	0.32%
Lead	15	-	-	3	-	1	-	7	-	1	-	27	0.02%
<b>Total People Assisted:</b>	<b>43,257</b>	<b>8,347</b>	<b>21,407</b>	<b>8,055</b>	<b>2,758</b>	<b>15,901</b>	<b>3,034</b>	<b>19,358</b>	<b>11,264</b>	<b>4,990</b>	<b>1,674</b>	<b>140,045</b>	

Source: FHCRC Quarterly Reports, July 1, 2013 – June 30, 2018.

*Agency Coordination*

Many agencies oversee the apartment rental process and related practices. This oversight includes ensuring that fair housing laws are understood and complied with. The following organizations have limited oversight within the rental housing market, and some of their policies are described.

*California Apartment Association (CAA)*

CAA is the country's largest statewide trade association for rental property owners and managers. Incorporated in 1941 to serve rental property owners and managers throughout California, CAA represents rental housing owners and professionals who manage more than 1.5 million rental units. CAA has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared towards improving the approach, attitude and professional skills of on-site property managers and other interested individuals. The CCRM program consists of 31.5 hours of training that includes fair housing and ethics along with other courses.

*National Association of Residential Property Managers (NARPM)*

NARPM promotes standards of business ethics, professionalism, and fair housing practices in the residential property management field. NARPM is an association of real estate professionals experienced in managing single-family and small residential properties. The Long Beach/Orange County Chapter covers Riverside County. In addition, NARPM certifies its members in the standards and practices of the residential property management industry and promotes continuing professional education. NARPM offers 3 professional designations: Residential Management Professional, RMP<sup>®</sup>, Master Property Manager, MPM<sup>®</sup>, and Certified Residential Management Company, CRMC<sup>®</sup>. These certifications require educational courses in fair housing.

**A. Land Use Policies**

*General Plan Land Use Element*

Land use policies are fundamental to ensuring housing opportunities. Any land use policies that do not promote a variety of housing opportunities can impede housing choice. The General Plan Land Use Element is a long-term land use policy that determines the type, amount, location and density of land uses within the County—except those portions of the County that fall within the boundaries of an incorporated city—in a manner prescribed by State Planning Law. The Land Use Element is the blueprint for the growth and development of the area. Riverside County is generally divided into two regions—west and east—by the San Jacinto and Santa Rosa Mountains whereby the incorporated cities in the western portion of the county contain most of the County’s population and whereby the eastern portion of the county is primarily rural and is roughly twice the size of western Riverside County.

The Land Use Element provides a wide range of land use designations that include residential uses as shown in **Table IV-1**. The building intensities and densities allowable within the range of land use designations provide for a wide range of housing opportunities throughout the county suitable to accommodate households of all incomes. In addition to the County’s General Plan, each of the incorporated cities within the County have adopted General Plans with land use elements specific to the unique character of each community and making it possible to create a range of housing opportunities.

**Table IV-1  
County of Riverside General Plan Land Use Designations Including Housing**

Land Use Designation	Building Intensity Range (du/ac)	Notes
Agriculture (AG) 10 ac min	Agriculture (AG) 10 ac min	Agricultural land including row crops, groves, nurseries, dairies, poultry farms, processing plants, and other related uses. One single-family residence allowed per 10 acres except as otherwise specified by a policy or an overlay.
Rural Residential (RR)	5 ac min.	Single-family residences with a minimum lot size of 5 acres. Allows limited animal keeping and agricultural uses, recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses and governmental uses.
Rural Mountainous	10 ac min.	Single-family residential uses with a minimum lot size of 10 acres. Areas of at least 10 acres where a minimum of 70% of the area has slopes of 25% or greater. Allows limited animal keeping, agriculture, recreational uses, compatible resource development (which may include the commercial extraction of mineral resources with approval of a SMP) and associated uses and governmental uses.
Rural Desert (RD)	10 ac min.	Single-family residential uses with a minimum lot size of 10 acres. Allows limited animal keeping, agriculture, recreational, renewable

**Table IV-1  
County of Riverside General Plan Land Use Designations Including Housing**

		energy uses including solar, geothermal and wind energy uses, as well as associated uses required to develop and operate these renewable energy sources, compatible resource development (which may include the commercial extraction of mineral resources with approval of SMP), and governmental and utility uses.
Estate Density Residential (RC-EDR)	2 ac min.	Single-family detached residences on large parcels of 2 to 5 acres. Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
Very Low Density Residential (RCVLDR)	1 ac min.	Single-family detached residences on large parcels of 1 to 2 acres. Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
Low Density Residential (RCLDR)	0.5 ac min.	Single-family detached residences on large parcels of 0.5 to 1 acre. Limited agriculture, intensive equestrian and animal keeping uses are expected and encouraged.
Rural (RUR)	20 ac min.	One single-family residence allowed per 20 acres. Extraction of mineral resources subject to SMP may be permissible provided that scenic resources and views are protected.
Estate Density Residential (EDR)	2 ac min.	Single-family detached residences on large parcels of 2 to 5 acres. Limited agriculture and animal keeping is permitted, however, intensive animal keeping is discouraged.
Very Low Density Residential (VLDR)	1 ac min.	Single-family detached residences on large parcels of 1 to 2 acres. Limited agriculture and animal keeping is permitted, however, intensive animal keeping is discouraged.
Low Density Residential (LDR)	0.5 ac min.	Single-family detached residences on large parcels of 0.5 to 1 acre. Limited agriculture and animal keeping is permitted, however, intensive animal keeping is discouraged.
Medium Density Residential (MDR)	2 - 5 du/ac	Single-family detached and attached residences with a density range of 2 to 5 dwelling units per acre. Limited agriculture and animal keeping is permitted, however, intensive animal keeping is discouraged. Lot sizes range from 5,500 to 20,000 sq. ft., typical 7,200 sq. ft. lots allowed.
Medium High Density Residential (MHDR)	5 - 8 du/ac	Single-family attached and detached residences with a density range of 5 to 8 dwelling units per acre. Lot sizes range from 4,000 to 6,500 sq. ft.

**Table IV-1**  
**County of Riverside General Plan Land Use Designations Including Housing**

High Density Residential (HDR)	8 - 14 du/ac	Single-family attached and detached residences, including townhouses, stacked flats, courtyard homes, patio homes, townhouses, and zero lot line homes.
Very High Density Residential (VHDR)	14 - 20 du/ac	Single-family attached residences and multi-family dwellings
Highest Density Residential (HHDR)	20+ du/ac	Multi-family dwellings, includes apartments and condominium. Multi-storied (3-plus) structures are allowed.

Source: County of Riverside General Plan Land Use Element, Table LU4, Updated July 2017.

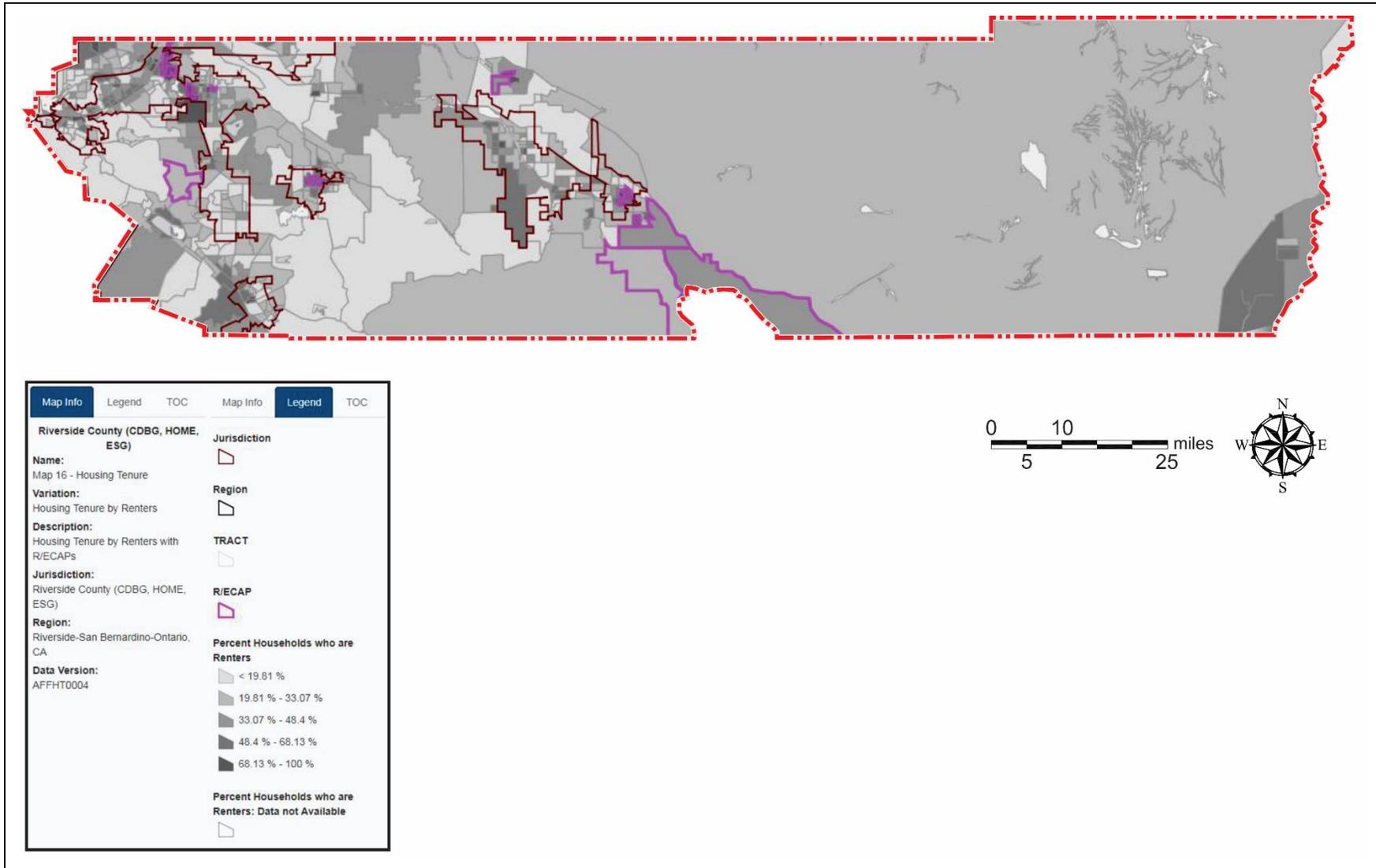
**Map IV-1** illustrates the County’s land use designations in the General Plan, **Map IV-2** illustrates the actual zoning and **Map IV-3** illustrates the tenure of occupants of housing throughout the County.

Map IV-1: Riverside County General Plan Land Use Foundation Components



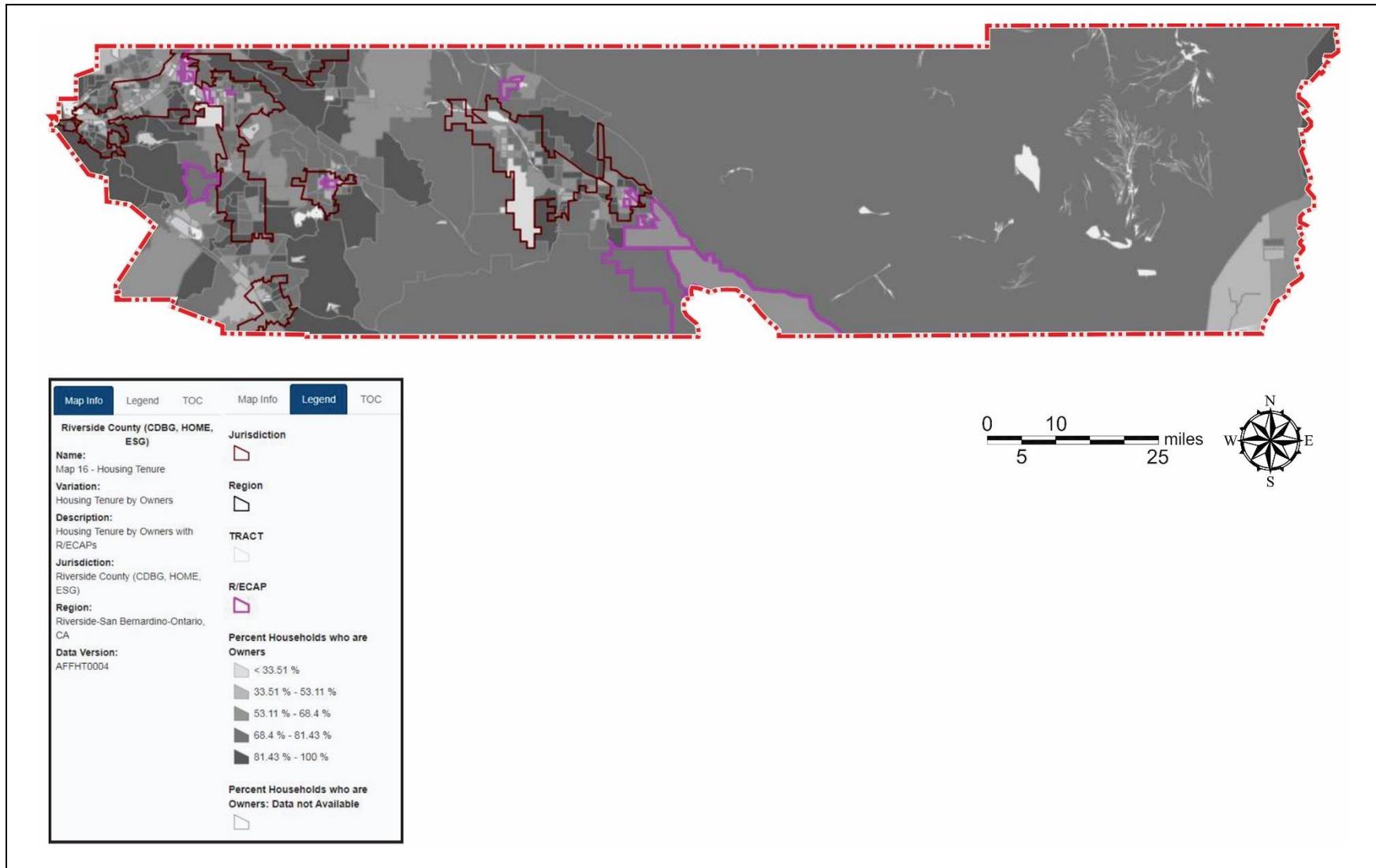
Source: County of Riverside General Plan Land Use Element, Updated July 2017.

Map IV-2: Housing Tenure – Renters



Source: Map No. 16 - Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Map IV-3: Housing Tenure - Owners



Source: Map No. 16 - Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

Comparison of the General Plan Land Use Map (**Map IV-1**) and the Housing Tenure Maps (**Maps IV-2 and IV-3**) shows that higher density multifamily rental housing options are primarily found in western Riverside County and within incorporated cities throughout the County. Areas just outside of the more urbanized communities are generally more owner-occupied lower density uses. The vast majority of the County’s land mass is open space—particularly the eastern portion of the County where owner-occupied housing uses are predominant.

*Zoning Ordinance*

Riverside County Ordinance No. 348 (Ordinance) provides the Land Use Planning and Zoning Regulations for the unincorporated County. The Ordinance provides for land use designations, general plan amendment procedures, zoning classifications, zoning districts (including permitted uses, development standards and other regulatory considerations), and general provisions.

The Ordinance contains key definitions of terms that have the potential to impact fair housing choice. An evaluation of these definitions is contained within the Fair Housing Impediment Study summarized in **Table IV-2**.

**Table IV-2  
Fair Housing Impediment Study**

Type of Impediment “Practice or Regulatory”	Compliance Yes or No	Evaluation Description	Jurisdiction Practice	Comments
Regulatory	Yes	Definition of “Family”	Section 21.34 of the Ordinance defines “Family” as: “One or more persons living together as a single housekeeping unit in a dwelling unit.	County definition complies with State law and does not discriminate based on the individual characteristics of the person or persons living in the dwelling unit.

**Table IV-2  
Fair Housing Impediment Study**

Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Evaluation Description	Jurisdiction Practice	Comments
Practice	Yes	Single Housekeeping Unit (as related to the definition of "Family")	Section 21.62g of the Ordinance defines "Single Housekeeping Unit" as: "Any household whose members are a group of persons jointly occupying a single dwelling unit, including the joint use and responsibility for common areas, and sharing household activities and responsibilities such as meals, chores and expenses and where, if the unit is rented, all adult residents have chosen to jointly occupy the entire premises of the dwelling unit with joint use and responsibility for the premises, and the makeup of the household occupying the unit is determined solely by the residents of the unit rather than the landlord or property manager."	County definition complies with State law and does not discriminate based on the individual characteristics of the person or persons living in the dwelling unit.
Regulatory	Yes	Definition of "Disability"	No definition of "Disability" is contained in the Zoning Ordinance.	County uses "Disability" definition set forth in State Codes.
Practice	Yes	Personal Characteristics of residents considered?	County does not regulate or consider residents personal characteristics.	County provides equal access to housing for special needs residents such as the homeless, elderly, and disabled.
Practice	Yes	On-site supporting services permitted?	County does not prohibit on-site supportive services in connection with housing.	County encourages services needed by residents.
Regulatory	Yes	Restrict number of unrelated persons residing together if they are disabled?	The County definitions of Health Facilities provide for a range of living situations for disabled persons.	County complies with State law.

**Table IV-2  
Fair Housing Impediment Study**

Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Evaluation Description	Jurisdiction Practice	Comments
Practice	Yes	Mischaracterize ADA housing as "Boarding, Rooming House or Hotel"?	Section 21.12 of the Ordinance defines "Boarding, Rooming or Lodging House" as: "A residence or dwelling unit, or part thereof, where a room or rooms are rented under two or more separate written or oral rental agreements, leases, subleases or combination thereof, whether or not the owner, agent or rental manager resides within the residence, on a monthly or greater basis. A Boarding, Rooming or Lodging House does not include Sober Living Homes or Residential Facilities, Residential Care Facilities, Residential Care Facilities for the Elderly and Alcohol or Drug Abuse Treatment Facilities serving six (6) or fewer persons."	In accord with State law, the definition specifically excludes special needs housing types such as Sober Living Homes or Residential Facilities, Residential Care Facilities, Residential Care Facilities for the Elderly and Alcohol or Drug Abuse Treatment Facilities serving six (6) or fewer persons.
Regulatory	Yes	Allow ADA Modifications in municipal-supplied or managed housing?	County complies with State law. County encourages ADA access modifications.	County complies with State law. County encourages ADA access modifications.
Practice	Yes	Provide a reasonable accommodation procedure for land use and zoning regulations to benefit persons with disabilities?	Section 1.12 of the Ordinance specifies the County's Reasonable Accommodation procedure.	County complies with
Regulatory	Yes	Variances & Exceptions to zoning and land-use rules?	County requires an application and a public hearing for zoning variances as required by State law.	County complies with State law regarding the granting of variances and exceptions to zoning and land-use rules.

**Table IV-2  
Fair Housing Impediment Study**

Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Evaluation Description	Jurisdiction Practice	Comments
Regulatory	Yes	Residential Mixed Land Use Standards	Article IXf defines a Mixed Use Zone that includes one family dwellings, multiple family dwellings that do not include a non-residential use, home occupation, public parks and plazas. The County specifies 44 commercial uses permitted in conjunction with mixed use development and an additional 11 commercial uses that are allowable with a conditional use permit (CUP).	County complies with State law.
Regulatory	Yes	Zoning Exclusion regarding Discrimination?	County does not exclude or discriminate housing types based on protected class.	All County zoning and land use regulations and policies comply with Federal and State law regarding the prohibition of discrimination.
Regulatory	Yes	Senior Housing Restrictions & Federal Law	County permits multi-family senior housing in accordance with zoning standards.	Senior Housing means multiple-family dwelling units, each of which is occupied by one resident who is required to be at least 55 years of age.
Regulatory	Yes	Housing Occupancy Standards and Limits	County Zoning Ordinance does not limit occupancy. The State Building and Housing Codes establish criteria to define overcrowding.	County codes comply with State law.
Regulatory	Yes	Zoning for Fair Housing	County's Housing Element promotes Fair Housing; Zoning Ordinance does not conflict with that policy.	County General Plan requires compliance with all Fair Housing laws and policies. Among the first provisions is the County's Reasonable Accommodation procedure.
Regulatory	Yes	Is a CUP required for Senior Housing?	A CUP is not required to designate a housing development as senior housing.	County complies with State law.

**Table IV-2  
Fair Housing Impediment Study**

Type of Impediment “Practice or Regulatory”	Compliance Yes or No	Evaluation Description	Jurisdiction Practice	Comments
Regulatory	Yes	Does County distinguish between handicapped housing and other types of single-family or multi-family housing?	The County does not distinguish between handicapped housing and other types of housing.	County complies with State and Federal law regarding ADA designed housing.
Regulatory	Yes	How are “Special Group Housing” defined in the zone code?	Section 19.101 of the Ordinance defines group facilities in accordance with the California Health and Safety Code, including residential care facilities, residential care facilities for the elderly, alcohol or drug abuse treatment facilities, and sober living homes.	County Ordinance conforms to State law.
Regulatory	No	Siting and Standards for Transitional and Supportive Housing	The Ordinance does not adequately define transitional and supportive housing as required by the State of California Health and Safety Code, Sections 50675.14 and 50675.2 and the ordinance does not indicate that transitional and supportive housing are permitted uses within residential zones.	Siting and standards for transitional and supportive housing is now included as part of the Fair Housing Plan of this A.I. – refer to Chapter 6.
Regulatory	Yes	Does the County’s Building and planning codes make specific reference to accessibility requirements as set forth in the 1988 Fair Housing Act?	County adopted California State Building & Housing Codes. Accessibility requirements are referred in the Title 17 Design Standards.	County adopted California State Building & Housing Codes. Accessibility requirements are referred in the Title 17 Design Standards.

*Summary of General Plan Land Use Element and Zoning Ordinance Impediments Study*

Based on the fair housing impediment study conducted of the General Plan Housing Element, Land Use Element and Zoning Ordinance, one impediments to fair housing choice relative to siting and standards for transitional and supportive housing is identified.

*General Plan Housing Element*

State housing law requires that cities facilitate and encourage the provision of housing for a full range of economic segments of the community and special needs groups. Local government policies that limit or exclude housing for persons with disabilities, lower income people, people who are homeless, families with children, or other groups may violate the Fair Housing Act. Municipalities must take these factors into account when regulating land use and development standards throughout its residential zones. The Housing Element includes a constraints analysis that examines potential constraints to the development of affordable housing. Key elements of analysis include where certain uses are allowable within the community and development standards.

**Table IV-3**, adapted from the Housing Element, includes the zones that will allow for certain residential uses. Table IV-4, also from the Housing Element, provides a useful summary of the residential zoning requirements in Riverside County.

**Table IV-3  
Permitted Uses in Zones Allowing Residential Uses**

Use Description	R-R	R-R-O	R-1	R-1A	R-4	R-2	R-2A	R-3	R-3A	R-T	R-T-R	R-4	R-5	R-6	R-7	R-D	MU	SP	C-1/ C-P	A-1	A-P	A-2	A-D	N-A	CIV	W-1	W-2	W-2-M	C-T	C-P-S	C-R	IP	
Second Dwelling Units <sup>1</sup>	SUP	SUP	SUP	SUP	SUP	SUP	SUP	SUP	SUP	SUP	SUP	SUP				SUP		A		SUP	SUP	SUP	SUP	SUP	SUP		SUP	SUP					
Apartment Houses						PP	PP	PP	CUP			P		PP	P	PP		A															
Boarding, Rooming, Lodging Houses <sup>2</sup>						PP		PP	PP						PP	PP		A							PP		PP		PP		PP		
Residential Care Facility <sup>3</sup>																																	
Dwellings - Agricultural Mobile home <sup>4</sup>	PP	PP			P											P		A		PP	PP	PP	PP	PP	PP		PP	PP					
Dwellings - Multiple, Apartment <sup>5</sup>						PP	PP	PP	CUP			P		PP	P	PP	P	A															
Dwellings - One Family <sup>6,7</sup>	P	P	P	P	P	P	P	PP	P	P	P	P		PP		P	P	A		P	P	P	P	P	P		P	P					
Emergency Shelter																																P	
Migrant Agricultural Workers Mobile Home Park	CUP	CUP																A						CUP			CUP	CUP					
Mobile Home Parks <sup>11</sup>	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP	CUP		CUP		CUP	CUP	CUP		A		CUP							CUP	CUP					
Mobile Home - Single Family <sup>6</sup>	P	P	P	P	P	P	P	PP	P	P	P	P		PP		P	P	A		P	P	P	P	P	P		P	P					
Farm Labor Camp <sup>12</sup>	CUP	CUP																A		CUP		CUP			CUP								
Planned Residential Development <sup>10</sup>	P	P	P	P	P	P	P	P	P			P		PP				A															
Transitional and Supportive Housing <sup>13</sup>																																	

Source: Riverside County Planning Department – Ordinance No. 348 (zoning ordinance)  
 Key: CUP- Conditional Use Permit, P- Permitted, PP- Plot Plan, PUP- Public Use Permit, SUP- Second Dwelling Unit Permit, A- Allowed  
 Note: Please refer to Ordinance No. 348 (zoning ordinance) or the respective specific plan for allowable uses and development requirements.  
 1. The lot is zoned for a one-family dwelling as a permitted use; provided, however, that the lot may not be part of a planned residential development or located in the R-6 zone.  
 2. A building where lodging and meals are provided for compensation for 6 but not more than 15 persons, not including rest homes.  
 3. Requirements for establishing these uses and their subcategories are provided in Article XIXe of Ordinance 348.  
 4. One additional mobile home, excluding principal dwelling, for each 10 acres being farmed (occupied by owner, operator, or employee). SUP not required if 10 acres are being farmed.  
 5. A building or portion thereof used to house two or more families, including domestic employees or each such family, living independently of each other, and doing their own cooking.  
 6. A building or structure, including a mobile home or manufactured home, containing one kitchen and used to house not more than one family, including domestic employees. Zone A-D only allows one family.  
 7. Guest dwellings are allowed in all zones which permit single-family residential units provided the standards of Section 21.31 are met.  
 8. Where a permitted and existing commercial use is established and the unit is a part of the approval.  
 9. A residential development including, but not limited to, statutory and non-statutory condominiums, cluster housing, townhouses, community apartment projects and mobile home developments, that is permitted reduced lot area, width and depth requirements, and building setback requirements by integrating into the overall development open space and outdoor recreational facilities, which may include recreational and public buildings intended primarily for the use of the residents of the project, in the development.  
 10. A mobile home park is any area or tract of land where one or more mobile home lots are rented or leased or held out for rent or lease to accommodate mobile home used for human habitation. The rental paid for any such mobile home shall be deemed to include rental for the lot it occupies. Notwithstanding the foregoing definition, any person, not including a mobile home park operator, who owns a mobile home and owns, rents, or leases the land upon which the mobile home is located, is permitted to rent, lease, sublease, let out, or hire out for occupancy the mobile home and the land upon which the mobile home is located, without obtaining a permit to construct or operate a mobile home park.  
 11. Any building or group of buildings where five or more farm employees are housed.  
 12. Action 1.5c is included to amend the Zoning Ordinance to allow transitional and supportive housing types as residential uses and will only be subject to those restrictions that apply to other residential uses of the same type in the same zone.  
 13. If there is any inconsistency between this Table H-46 and the requirements provided for these zones in Ordinance No. 348, the zoning in Ordinance No. 348 shall apply.

Source: Riverside County Housing Element, 2017. Table H-49.

**Table IV-4  
Residential Zoning Requirements**

Development Standards	R-1, R-1A, R-2	R-2A	R-3	R-3A	R-4	R-6****	R-7 (attached)	R-7 (detached)	R-A	R-R	R-R-O	R-T****	R-T-R	R-D	A-1, A-2	A-P	A-P (Operations)	A-D	A-D (Operations)	MU
<b>Lot Dimensions</b>																				
Minimum Lot Size (sf)	7,200	7,200	7,200	9,000	3,500	5,000	None	None	20,000	0.5 acres	0.5 acres	7200	40000	20,000	20,000	5 ac	5 ac	20 ac	20 ac	None
Minimum Lot Width (ft)	60	60	60	60	40	30	None	None	100	80	80	60	100	100	100	200	200	x	x	None
Depth (ft)	100	100	100	100	80	x	n/a	n/a	150	150	150	100	100	150	150	x		x	x	n/a
<b>Setbacks</b>																				
Front (ft)	50	20	10	10	10	10	n/a	n/a	20	20	20	20	20	20	20	20	50	20	50	15'
Side (ft)	5*	5*	5	5**	5***	Varies	n/a	n/a	5	5	5	5	5	10	5	10	25	10	25	0'
Rear (ft)	10	10	10	10	10	10	n/a	n/a	10	10	10	5	5	5	10	10	25	10	25	n/a
<b>Height</b>																				
Feet	40	30	50-75	50-75	40-50	35-50	75/100	40'	40	40	40	40	40	50-75	40	40	50-105	40	50-105	75/100
Floors	3	2	n/a	n/a	n/a	n/a	n/a	n/a	3	3	3	3	3	n/a	n/a	n/a	n/a	n/a	n/a	11*****

Source: Riverside County, April 2017  
 Notes: This table is just a summary table. Refer to Ordinance No. 348 (zoning ordinance) for specifics regarding development standards. If there is any inconsistency between this Table H-45 and the requirements provided for these zones in Ordinance No. 348, the site development standards in Ordinance No. 348 shall apply.  
 \*10-foot setback on corner lots.  
 \*\*20-foot front setback for single-family. Setbacks are for buildings not over 35 feet in height. See Section 18.18 for detached accessory building setbacks.  
 \*\*\*Multiple buildings must have 20-foot separation between buildings. No structural encroachments permitted in front, side, or rear yard except as provided in Section 18.19.  
 \*\*\*\*Additional setbacks may be required depending on height and adjacent land uses.  
 \*\*\*\*\*Minimum size of mobile home shall be 450 square feet. Minimum size of conventional one-family house shall be 750 square feet. Mobile home front setbacks may be reduced to 10 feet if community recreational facilities exist in tract. Minimum frontage of 30 feet. If Community Recreation/Open Space is developed as part of the subdivision: (a) A minimum of 500 square feet for each residential lot shall be usable recreational area. (b) Combined square footage of community area and lot area, excluding street right of way, shall total no less than 6,000 square feet for each residential lot.  
 The minimum size site that may be developed for a mobile home park shall be 5 acres gross.  
 \*\*\*\*\*Minimum floor to ceiling height.

Source: Riverside County Housing Element, 2017. Table H-48.

*Single Family*

Single-family residences are permitted by right or allowed in 22 zones and permitted with a plot plan in two additional zones. This includes both conventional one family dwellings and manufactured housing.

*Multi-Family*

Multiple-family residential developments are permitted by right in three zones, permitted with a plot plan in five zones and permitted with a CUP in one zone. This is also an allowable use in the SP zone.

*Condominium*

Condominiums are permitted by right in three zones, permitted with a plot plan in five zones and permitted with a CUP in one zone. This is also an allowable use in the SP zone.

*Manufactured Housing*

State law requires the County to permit manufactured housing and mobile homes on lots for single-family dwellings provided that the manufactured home meets the location and design criteria established in the Zoning Ordinance.<sup>1</sup> Single-family residences are permitted by right or allowed in 22 zones and permitted with a plot plan in two additional zones. This includes both conventional one family dwellings and manufactured housing.

*Mobile Home Parks*

State law requires that jurisdictions accommodate a mobile home park within their community; however, a city, county, or a city and county may require a conditional use permit. A mobile home park refers to a mobile home development built according to the requirements of the Health and Safety Code, and intended for use and sale as a mobile home condominium, cooperative park, or mobile home planned unit development.<sup>2</sup> In compliance with State law, the County conditionally permits mobile home parks in 17 zones.

*Accessory or Second Dwelling Units*

Enacted in 2002, AB1866 requires the County to use a ministerial process to consider and approve accessory units proposed in residential zones.<sup>3</sup> According to HCD, a local government must "...accept the application and approve or disapprove the application

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<sup>1</sup>California Government Code, § 65852.3

<sup>2</sup>California Government Code § 65852.7

<sup>3</sup>California Government Code § 65852.2

ministerial without any discretionary review...” In order for an application to be ministerial, the process must apply predictable, objective, fixed, quantifiable, and clear standards. These standards must be administratively applied to the application and not otherwise be subject to discretionary decision-making by a legislative body.

According to the Housing Element, “Second units are currently allowed where the lot is zoned for a one-family dwelling as a permitted use (without a discretionary permit), and the lot is at least 7,200 square feet in size, but are not allowed on lots located within a PRD or located within the R-6 zone. Under the Land Use Ordinance, second units may be occupied by any person without rent, but if rented, an annual certification by the property owner is required, certifying that the renter is of low or moderate income as defined by Section 50093 of the Health and Safety Code. The County has amended Ordinance No. 348 (zoning ordinance) to permit second units on residential lots zoned for single-family or multifamily residential use, subject to issuance of a second unit permit. This provision was made in response to state of California legislation promoting additional housing opportunities for elderly relatives and rental purposes. The ordinance requires property owners to submit an annual certification that the second units are being offered without rent (for relatives, for example) or rents in the low- to moderate-income range based upon HUD statistics. Ordinance No. 348 does not require any excessive restrictions that would be a constraint to the development of second units. In January 2017, SB 1069 (Chapter 720, Statutes of 2016) and AB 2299 (Chapter 735, Statutes of 2016) made several changes to address barriers to the development of Second Units (Accessory Dwelling Units). The County has revised action 3.5b to ensure they are meeting all State Law requirements.”

### *Residential Care Facilities*

The Lanterman Developmental Disabilities Services Act declares that mentally, physically, and developmentally disabled persons, children and adults who require supervised care are entitled to live in normal residential settings. State law requires that licensed residential care facilities serving six or fewer persons be treated as a residential use under zoning, be allowed by right in all residential zones, and not be subject to more stringent development standards, fees, taxes, and permit procedures than required of the same type of housing (e.g., single-family homes) in the same zone.<sup>4</sup> According to the Housing Element, “The Land Use Ordinance also addresses special needs groups. It provides for congregate care residential facilities, allowing an opportunity for transitional housing and for independent living units. Specifically, congregate care residential facilities are a housing arrangement where non-medical care and supervision are provided as well as meals and social, recreational, homemaking, and security services. Congregate care residential facilities with six or fewer persons are permitted “by right” in all residential zones. Congregate care residential facilities with seven or more persons are subject to a Public Use Permit (PUP) and/or CUP, depending on the zone and land use designation.”

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<sup>4</sup>Welfare and Institutions Code, §5000 et. seq. Health and Safety Code, §1500 et. seq.

According to a search of the State of California Department of Social Services Care Facility Database in February 2019, Riverside County currently includes:

- 459 Residential Elder Care Facilities with a capacity to serve 10,168 people
- 37 Adult Day Facilities with a capacity to serve 2,459 people
- 304 Adult Residential Facilities with a capacity to serve 1,743 people
- 5 Community Crisis Homes or Social Rehabilitation Facilities with a capacity to serve 65 people.
- 76 licensed home care agencies provide service throughout the County
- 75 24-Hour Residential Care Facilities for Children provide care to 916 people

### *Emergency Shelters/Transitional Housing*

State law requires the County to identify adequate sites, appropriate zoning, development standards, and a permitting process to facilitate and encourage development of emergency shelters and transitional housing. The courts have also passed subsequent rulings.<sup>5</sup> To that end, State Law (SB2) requires jurisdictions to designate a zone and permitting process to facilitate the siting of such uses. SB2 also permits the County to apply limited conditions to the approval of ministerial permits for emergency shelters. If a conditional use permit is required, the process to obtain the conditional use permit may not unduly constrain the siting and operation of such facilities. The identified zone(s) must have sufficient capacity to accommodate at least one year-round shelter.

The State of California defines an emergency shelter<sup>6</sup> as “housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or households may be denied emergency shelter because of an inability to pay.” Section 21.32b of the Ordinance similarly defines emergency shelters.

According to the Ordinance, emergency shelters are permitted uses subject to development standards within the I-P (Industrial Park) zone. According to the Housing Element “The I-P zone is appropriate for an emergency shelter because of its close proximity to municipal services, the uses in the zone are compatible (the main use is service commercial, and there are no manufacturing or industrial uses), and there is sufficient land available in the form of vacant lots and vacant warehouses. Currently the County has 181 vacant parcels available for an emergency shelter. These parcels range in size from less than an acre to 295 acres (average parcel size of 12 acres). In addition to available vacant land, the County has 132 sites with available warehouses that would be appropriate for an emergency shelter, ranging in size from 290 square feet to 800,000 square feet (average square footage of 25,000). The County has objective development and management standards that are designed to encourage and facilitate the development of or conversion to an emergency shelter.”

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<sup>5</sup>Hoffmaster v. City of San Diego, 55 Cal.App.4th 1098

<sup>6</sup> Health and Safety Code Section 50801.

With respect to transitional and supportive housing, the Housing Element indicates that transitional housing and supportive housing are not currently permitted as a residential use and are not currently only subject to those restrictions that apply to other residential dwellings of the same type in the same zone, as is required by California Government Code Section 65583(a)(5). Transitional and supportive housing must be permitted in all zones allowing residential uses and are not subject to any restrictions (e.g., occupancy limit) not imposed on similar dwellings (e.g., single family home, apartments) in the same zone in which the transitional housing and supportive housing is located. In the current Land Use Ordinance, emergency/transitional shelters with six or fewer beds and County-owned shelters are exempt, and emergency/transitional shelters with more than six beds are classified as a congregate or group facility and implicitly included as such in the zoning ordinance. Shelters or transitional housing with seven or more beds are subject to a CUP or PUP.

Based on this information, the Housing Element included an action (Action 1.5c) that states “transitional and supportive housing types will be treated as a residential use and will only be subject to those restrictions that apply to other residential uses of the same type in the same zone.” Further, the Housing Element indicates that the County plans to process an amendment to the Ordinance to: “(1) revise the definition of transitional housing and supportive housing to be consistent with Health and Safety Code Sections 50675.14 and 50675.2; and (2) list these as permitted uses within residential zones.” Review of the Ordinance in February 2019 reveals that the amendment to Ordinance No. 348 has not been adopted. This item is identified as an impediment to fair housing choice.

## **B. Development Policy**

### *Development Standards*

The Ordinance provides the County’s policy for minimum residential development standards to ensure the construction of quality housing in a suitable living environment for all residents. **Table IV-4** presented earlier provides a summary of these residential development standards including by zone, the minimum lot size, width and depth, setbacks, height and number of stories. Analysis of these development standards did not reveal standards that would not be conducive to housing development or that would otherwise constrain the ability of the private market to provide a range of housing options for all income segments of the community.

### *Development Fees*

Since the passage of Proposition 13 in 1978, local governments have had to diversify their revenue sources. As reliance on General Fund revenues declined, local governments began charging service fees and impact fees to pay for municipal services needed to support the development of new housing. Development impact fees depend on the location, project

complexity, and cost of mitigating environmental impacts. The County periodically updates its development impact fees. The Housing Element provides an analysis of developer impact fees by area for single-family residential construction and multifamily residential construction, as shown in **Table IV-5**. The fees appear to be reasonable and would not unduly constrain housing development.

**Table IV-5  
Developer Impact Fee Summary by Area**

<b>Developer Impact Fee by Area Plans Commencing 11-13-15</b>	<b>Single-Family Residential (\$ per dwelling unit)</b>	<b>Multifamily Residential (\$ per dwelling unit)</b>
Western Coachella Valley	\$3,669	\$2,704
Desert Center	\$3,648	\$2,670
Palo Verde Valley	\$3,705	\$2,710
Eastern Coachella Valley	\$4,385	\$3,187
Jurupa	\$3,669	\$2,685
Highgrove	\$4,320	\$3,142
Reche Canyon/Badlands	\$4,234	\$3,081
Eastvale	\$3,669	\$2,685
Temescal Canyon	\$4,281	\$3,115
Lake Mathews / Woodcrest	\$4,473	\$3,249
San Jacinto Valley	\$4,059	\$2,957
Riverside Extended Mountain (REMAP)	\$3,851	\$2,813
Lakeview / Nuevo	\$3,698	\$2,705
Mead Valley	\$4,159	\$3,029
Elsinore	\$3,832	\$2,799
Harvest Valley / Winchester	\$3,669	\$2,685
Sun City / Menifee Valley	\$3,669	\$2,685
Southwest (SWAP)	\$3,669	\$2,685
The Pass	\$3,985	\$2,907

Source: County of Riverside General Plan Housing Element, 2017 Table H-54, and Ordinance No. 659.13 (Establishing a Development Impact Fee Program) – an Ordinance of the County of Riverside amending Ordinance No. 659 – effective March 14, 2015.

State law allows local governments to charge fees necessary to recover the reasonable cost of providing services. State law also allows local governments to charge impact fees provided the fee and the amount have a reasonable nexus to the burden imposed on local governments. The fees are necessary to provide an adequate level of services and mitigate

the impacts of housing development.

### *Building Codes*

Building codes are enacted to ensure the construction of quality housing and further public health and safety. Through the periodic amendment of Ordinance No. 457 (Building Codes and Fees), the County establishes its local building codes, incorporating international and state standards with minor modifications to fit local conditions. The County's building codes are designed to protect public health, safety, and welfare. The County adopts updates as the referenced codes are amended. The Housing Element review of applicable building code amendments approved by the County Board of Supervisors since 2008, "none have impacted the development process, cost, timing, or in any way increased the burden or constraint of government controls on the production of housing."

### *Accessibility Standards*

Ensuring that buildings are accessible to people with disabilities is an important way to improve fair housing. However, the rigid adherence to non-essential codes may indirectly create discriminatory impacts on people with disabilities. For this reason, the County adopted a reasonable accommodation procedure in its Zoning Ordinance No. 348 to address situations where exceptions would be prudent.

The County's building code requires that all new residential construction meet the federal Americans with Disabilities Act (ADA) requirements and that a minimum percentage of units in new developments are built to be fully accessible to persons with disabilities. Compliance with ADA is found to increase the cost of housing production, these minimum standards ensure the development of accessible housing.

The County uses federal funds for a host of housing programs. The use of federal funds for a project means that the project must meet federal accessibility guidelines that accommodate people with disabilities. For new construction and substantial rehabilitation, at least 5 percent of the units must be accessible to persons with mobility impairments and an additional 2 percent of the units must be accessible to persons with sensory impairments. New multiple-family housing must also be built so that:

- The public and common use portions of such units are readily accessible to and usable by disabled persons;
- The doors allowing passage into and within such units can accommodate wheelchairs; and
- All units contain adaptive design features.<sup>7</sup>

The U.S. Department of Housing and Urban Development (HUD) also recommends, but does

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<sup>7</sup>Section 804(f)(3)(C) of the Fair Housing Act

not require, that the design, construction and alteration of housing units incorporate, wherever practical, the concept of visibility. This recommendation is in addition to requirements of Section 504 and the Fair Housing Act. Recommended construction practices include wide enough openings for bathrooms and interior doorways and at least one accessible means of egress/ingress for each unit.<sup>8</sup> To address these standards, Title 24 of the California Code of Regulations incorporates the latest accessibility standards promulgated by the state and federal government.

*Reasonable Accommodation*

In 2001, the State Office of the Attorney General issued a letter encouraging local governments to adopt a reasonable accommodation procedure.<sup>9</sup> The Department of Housing and Community Development has also urged the same. The Fair Housing Act and California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodation when such accommodation may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The State Attorney General also provided guidance on the preferred procedure.

Section 1.12 of the Ordinance specifies the County's Reasonable Accommodation procedure relative to land use and zoning regulations to benefit persons with disabilities who seek equal access to housing under the Federal Fair Housing Act and the California Fair Employment and Housing Act. The procedure is ministerial in nature, with requests for reasonable accommodation made by a person with a disability using an application form provided by the Planning Department. The request for a modification or exception to the requirements or standards for the siting, development and use of housing or housing related facilities to eliminate a regulatory barrier and provide a person with a disability with equal opportunity to secure or maintain housing of their choice is reviewed by the Planning Director in consultation with the Office of County Counsel within 45 days of the request, following objective criteria. A notice of determination is made in writing to the applicant and an appeals process is specified within the ordinance.

**C. Public Housing Authority (PHA) Administrative Plan Review**

The Housing Authority of the County of Riverside is a public agency chartered by the State of California to administer the development, rehabilitation or financing of affordable housing programs. The primary mission of the Housing Authority is to provide affordable decent, safe and sanitary housing opportunities to low- and moderate-income families including elderly and handicapped persons, while supporting programs to foster economic self-sufficiency. Review of the Housing Authority's Administrative Plan that includes assistance procedures did not reveal any impediments to fair housing choice. The Housing Authority is subject to Title VII of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act

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<sup>8</sup> HUD Directive, Number 00-09.

<sup>9</sup>State Office of Attorney General, May 15, 2001.

of 1968, Executive Order 11063, the Rehabilitation Act of 1973 and Age Discrimination Act of 1973 and the HUD regulations promulgated pursuant to those laws. As such, documents related to the provision of housing and housing assistance are reviewed by the Office of County Counsel and have been approved for use. There are several methods of recourse in the event of a bona-fide discrimination complaint in connection with Housing Authority assistance programs. Complainants are always encouraged to seek the free counsel of the Fair Housing Council of Riverside County as an objective third party. Complainants are similarly encouraged to address their concerns to their Housing Specialist, as appropriate, or a Housing Supervisor within the Housing Authority in writing or by telephone. Any unresolvable complaints or those involving a staff member will be referred to a Housing Supervisor or Program Integrity Monitoring. The Housing Authority Administrative Plan, Section 18.2 indicates that complaints of discrimination or harassment involving Housing Authority Staff shall be addressed in accordance with County personnel policies.

**D. Housing Programs, Public Services, Employment and Transportation**

*Regional Housing Needs Assessment*

The County of Riverside Housing Element adopted October 3, 2017 provides a comprehensive summary of how the County intends to meet its obligations pursuant to State law to facilitate and encourage the production of housing to accommodate population and employment growth. Central to this obligation is the Regional Housing Needs Allocation (RHNA) determined by the Southern California Association of Governments (SCAG) based on planning factors including the number of housing units needed to accommodate future population and employment growth, the number of units needed to allow for a desired level of vacancies and the replacement of housing units normally demolished, the number of very low, low, moderate and above-moderate income households needed in the community, and other factors determined by the State.

According to the Housing Element, SCAG determined that unincorporated Riverside County is responsible for providing for 30,303 housing units, with the majority permitted to be above 120 percent of median family income. According to the Housing Element, “this allocation represents a decrease of approximately 20,312 units as compared to the 2006–2014 RHNA planning period. This decrease was based upon the reexamination of growth trends and incorporation of the cities of Menifee, Eastvale, Jurupa Valley, and Wildomar during the previous planning period.” The County may address this obligation through housing production, alternative sites credits or zoning adequate sites for the development of housing necessary to meet the RHNA. The County plans to meet this obligation through a combination of these approaches.

*Housing and Public Service Goals*

The Housing Element sets forth five primary goals, each with associated policies, actions,

implementing resources, responsible agency and timeframes included. These goals include:

- Goal 1: To assist in the development of adequate housing to meet the county's fair share of the region's housing needs for all economic segments of the population, with an emphasis on lower-income households and households with special needs
- Goal 2: To conserve and improve the condition of the housing stock, particularly affordable housing
- Goal 3: To promote equal housing opportunities for all persons regardless of race, age, sexual orientation, religion, sex, etc.
- Goal 4 Establish adequate planning, administrative and fiscal tools to implement housing policies
- Goal #5: Reduce per capita residential energy use

With respect to the third goal to promote equal housing opportunities for all persons regardless of race, age, sexual orientation, religion, sex, etc., the County has committed specifically to:

- 3.1a: The Economic Development Agency (EDA)/Housing Authority shall use CDBG funds to continue to use the services of the Fair Housing Council of Riverside County to implement a number of programs, including: 1. Audits of lending institutions and rental establishments. 2. Education and training of County staff. 3. Education and outreach to apartment owners, associations, management companies, lending institutions, building industry associations, homebuyers, and residents in emergency shelters and transitional housing facilities.
- 3.1b: The EDA shall update the Analysis of Impediments to Fair Housing Choice.
- 3.2a: Continue to use the services of the Fair Housing Council to provide education and outreach services to the public in both Spanish and English as well as for mortgage lenders applying for certification or recertification to participate in the First Time Home Buyer Down Payment Assistance Program.
- 3.3a: The Housing Authority and Shared Housing, a Riverside Experience (SHARE) along with nonprofits and community Access Center, the County Department of Public Social Services (DPSS) shall Ensure that persons with disabilities (including persons with developmental disabilities) have increased access/placement in residential units rehabilitated or constructed through County programs by completing the following: Continue to cooperate with nonprofit agencies that provide placement or referral services for persons with disabilities. Encourage "universal design" features such as level entries, larger bathrooms, and lower kitchen countertops to accommodate persons with disabilities. Encourage multifamily housing developers to designate accessible and/or adaptable units already required by law to be affordable to persons with disabilities or persons with special needs. Continue to review the County's formal procedure for reviewing and approving requests for modifications to building or zoning requirements in order to ensure reasonable accommodations for persons with disabilities to ensure

consistency with state law. Coordinate with the Inland Regional Center to implement an outreach program that informs families in the county on housing and services available for persons with developmental disabilities. The program could include the development of an informational brochure, including information on services found on the County's website, and providing housing-related training for individuals/families through workshops, as funding and staffing permit.

- 3.3b: The Housing Authority, EDA and DPSS shall continue to utilize the following programs to assist special needs households: Section 8 Housing Choice Voucher (HCV), Family Unification Program, Family Self-Sufficiency Program, Housing Opportunities for Persons with AIDS (HOPWA), Veterans Affairs Supportive Housing (VASH), Foster Care Youth Program and Tenant Based Rental Assistance (TBRA).
- 3.3c: The Housing Authority shall continue to provide rental certificates to persons with disabilities (Housing Choice Voucher Program, previously known as Section 8 Rental Assistance Program).
- 3.3d: On an ongoing basis, the Housing Authority shall continue its collaborative agreement with Riverside County Department of Mental Health to administer Shelter Plus Care housing assistance for mentally ill homeless persons in the City of Riverside and within western and eastern Riverside County, as funding is awarded. Services should be expanded to include western Riverside County during the planning period.
- 3.3e: The Housing Authority shall maintain public housing units and assist extremely low- and very low-income recipients with Housing Choice Vouchers (Section 8 rental assistance vouchers).
- 3.3f: DPSS shall continue to work with nonprofit organizations and participating cities, as applicable, on programs to prevent homelessness, including rental mortgage assistance.
- 3.3g: DPSS shall support legislation for block grant entitlement of Supportive Housing Program and Shelter Plus Care Program funds.
- 3.3h: The County will continue to administer the Mobile Home Rent Stabilization Ordinance No. 760, limiting rent increases to correspond to the increase in the Consumer Price Index.
- 3.4a: The County EDA shall continue to implement the Mortgage Credit Certificate Program (MCC) for low- to moderate-income homeowners.
- 3.4b: The County EDA shall continue to provide down payment assistance and closing cost assistance to low-income first-time homebuyers through the First Time Home Buyer Program.
- 3.5a: The County EDA shall continue to work with public or private sponsors to encourage acquisition/rehabilitation of existing multifamily units to be converted to senior housing with a portion of the units required to be reserved for households with incomes below 80 percent of the County median.

*Employment*

Labor force participation—a key measure of the health of the local economy—continues to improve in Riverside County. Since 2010, the unemployment rate has steadily declined from a 20-year high of 14.7 percent to 5.2 percent in 2017 according to 2018 statistics from the State of California Employment Development Department. The recent 5.2 percent unemployment rate is lower than the 5.4 percent rate achieved in the year 2000—a remarkable achievement considering the more than 57 percent expansion of the civilian labor force (from 680,700 people in 2000 to 1,072,500 people in 2017).

**Table IV-6** shows the occupations of residents, the number of residents in each category, and the percentage employed in each occupation. Of particular note is the high proportion of managerial/professional and sales/office occupations held by Riverside County residents.

**Table IV-6  
Occupation Characteristics**

Occupations of Residents	Number of Residents	% Employed by Occupation
<b>Total civilian employed population 16 and over</b>	978,726	
Management, business, science, and arts	287,745	29.4%
Service	209,447	21.4%
Sales and office	240,767	24.6%
Natural resources, construction, and maintenance	111,575	11.4%
Production, transportation, and material moving	129,192	13.2%

Source: 2013-2017 American Community Survey, S2405.

*Transportation*

Riverside County residents in urban and suburban areas generally enjoy superior access to transportation infrastructure, which includes the Riverside Transit Agency (RTA) bus system, the Sun Line Transit Agency in the Palm Springs area, Palo Verde Transit Agency in the Blythe area, the Riverside Metrolink Station, with links to San Bernardino County’s Omnitrans system as well as to Amtrak, and the Corona Transit Center and Metrolink station. This large County is home to at least four municipal airports, (Banning Muni Airport, Corona Muni Airport AJO, Palm Springs International Airport, Riverside Muni Airport), five County-owned and operated airports (Chiriaco Summit, French Valley, Hemet Ryan, Jacqueline Cochran, and Blythe), and enjoys proximity to Ontario International Airport in nearby San Bernardino County. The County is also traversed by numerous major freeways within its boundaries (Interstates 10, 15, 215 and State Routes 60, 91, 71, 74, 79, 86, and 111).

Public transit helps move people who cannot afford personal transportation or who elect not to drive. Elderly and disabled persons also rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Many lower income persons are also dependent on transit to go to work. Public transit that provides a link between job opportunities, public services, and affordable housing helps to ensure that transit-dependent residents have adequate opportunity to access housing, services, and jobs. Each of the public transit operators mentioned in the preceding paragraphs have programs available to incentivize ridership by students, seniors and persons with disabilities. Each has an ADA plan and each of the bus lines offer a version of dial-a-ride that provides origin-to-destination advanced reservation transportation service for seniors and persons with disabilities who need to travel to and from destinations generally within  $\frac{3}{4}$  to 1 mile of an existing fixed-route service. Although it is economically unfeasible to provide fixed-route public transportation in the more rural areas of the County, the major population centers appear to be well-served.

Fair housing services include investigation of discrimination complaints, auditing and testing, education, and outreach. Landlord-tenant counseling services involve informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations and mediating disputes between landlords and tenants. This section reviews the fair housing services available in Riverside County and the nature and extent of fair housing complaints.

The County of Riverside has contracted with the Fair Housing Council of Riverside County, Inc. (FHCRC), a non-profit organization that fights to protect the housing rights of all individuals. Since 1986, FHCRC's mission is "to provide comprehensive services which affirmatively address and promote fair housing (anti-discrimination) rights and further other housing opportunities for all persons without regard to race, color, national origin, religion, sex, familial status (presence of children), disability, ancestry, age, sexual orientation, marital status, source of income or other arbitrary factors."

FHCRC provides services focused on eliminating housing discrimination, general housing assistance, and education and outreach activities to all residents in the Riverside County. The comprehensive services offered throughout Riverside County include:

- **Fair Housing (Anti-Discrimination) Services:** Provide educational workshops, outreach to the community, and investigation of discrimination complaints from residents. Residents who feel they have been discriminated against in securing or maintaining housing are encouraged to contact FHCRC at (951) 682-6581, to reach out via email at [fhcrc@fairhousing.net](mailto:fhcrc@fairhousing.net). Complainants are ultimately provided with fair housing education, counseling, referral to the State Department of Fair Employment and Housing (DFEH), HUD or a private attorney.
- **Landlord-Tenant Services:** Services including education, counseling, and mediation to both landlords and tenants to resolve disputes concerning a host of common issues impacting the business relationship between tenants and landlords. Common issues to be addressed in this category of service include eviction, occupancy standards, repairs, deposits, lease/rental terms, rental assistance, rent increases, habitability and notices.
- **Housing Counseling Services:** Pre-purchase workshops, mortgage delinquency and default resolution counseling, pre-purchase counseling, rental housing counseling and services for homeless counseling or referrals.
- **Training for Real Estate Professionals:** Training workshops for landlords, managers and owners in the following areas: Landlord/Tenant issues, First-Time Homebuyer, Foreclosure Prevention, and Fair Housing Laws.

**A. Fair Housing Education**

FHCRC provides a comprehensive, extensive and viable education and outreach program and services. FHCRC has been actively involved in outreach activities throughout Riverside County, including the provision of informational materials, brochures, newsletters, and referrals relating to fair housing. FHCRC also provides workshops, presentations, and seminars to community organizations including presentations at meetings of groups such as neighborhood organizations, advocacy organizations, chambers of commerce, government officials, real estate trade groups and housing organizations. FHCRC conducts outreach and education activities as follows:

- **Conduct Training Workshops for Renters:** The general types of activities conducted for renters includes a comprehensive fair housing presentation with particular focus placed on common landlord-tenant disputes and misconceptions about the law in the State of California. Topics include, but are not limited to repairs notices, lease agreements, landlord-tenant mediation, Section 8, evictions, habitability and occupancy standards.
- **Conduct Training Workshops for Housing Providers:** The general types of activities conducted for housing providers include workshops tailored to provide detailed analysis of fair housing laws and interpretation, with specific information on discrimination against families with children, people with disabilities, sexual harassment, hate crimes, and advertising.
- **Increase Public Awareness:** The general types of activities conducted to increase public awareness includes developing and distributing hundreds of pieces of multi-lingual literature throughout the County, aimed at a variety of audiences, describing how housing injustices arise, the laws that protect against housing discrimination, and ways to prevent housing inequality.

**Table V-1  
Countywide Education and Outreach Provided by FHCRC – 2017-2018**

Activity Type	Number
Workshop: First-Time Homebuyer	20
Workshop: Fair Housing	3
Workshop: Landlord-Tenant	3
Presentation / Attendance at Meetings or Events	35
Fair Housing Initiatives Program –Testing	132
Pieces of Literature Distributed	12,693

Source: FHCRC Quarterly Reports, July 1, 2013 – June 30, 2018.

## B. Fair Housing Enforcement

### *Discrimination Complaint Intake and Investigation*

FHCRC responds to discrimination inquiries and complaints in an expedient manner, relying on over 30 years of experience in the industry. Determining whether a client is inquiring regarding a fair housing discrimination problem or a non-discrimination landlord/tenant or other problem can be difficult. Often what may appear at first to be a simple landlord/tenant dispute turns out to be a situation where a landlord has violated one or more fair housing laws.

FHCRC investigates allegations of discrimination based on a person's status as a member of one of the State or Federal protected categories, which include: Race, Color, Religion, National Origin, Sex, Familial Status, Disability, Marital Status, Sexual Orientation, Ancestry, Age, Source of Income, and Arbitrary Characteristics. Race, Color, Religion, National Origin, Sex, Familial Status, and Disability are the categories protected by the federal Fair Housing Act. The State of California provides protection from discrimination based on all seven of the federal protected categories and has added Marital Status, Sexual Orientation, Ancestry, Age, Source of Income and Arbitrary Characteristics as additional protected classes under state law. According to FHCRC quarterly reports covering July 1, 2013 through June 30, 2018, 87 percent of fair housing complaints were received by telephone and 13 percent of complaints were received in-person at an office location. Once a Fair Housing complaint is received, FHCRC educates the complainant of their rights and responsibilities. The complainants are advised of possible further investigation depending on the complaint.

FHCRC uses government regulated testing methodologies to enforce, support, and conduct fair housing investigations. A housing discrimination complaint can be investigated through testing, the gathering of witness statements and through research surveys. Based on the details provided by the complainant, FHCRC will either investigate the complaint or advise the complainants of their other options, which include conciliation, Housing and Urban Development (HUD), Department of Fair Employment and Housing (DFEH), or a private attorney.

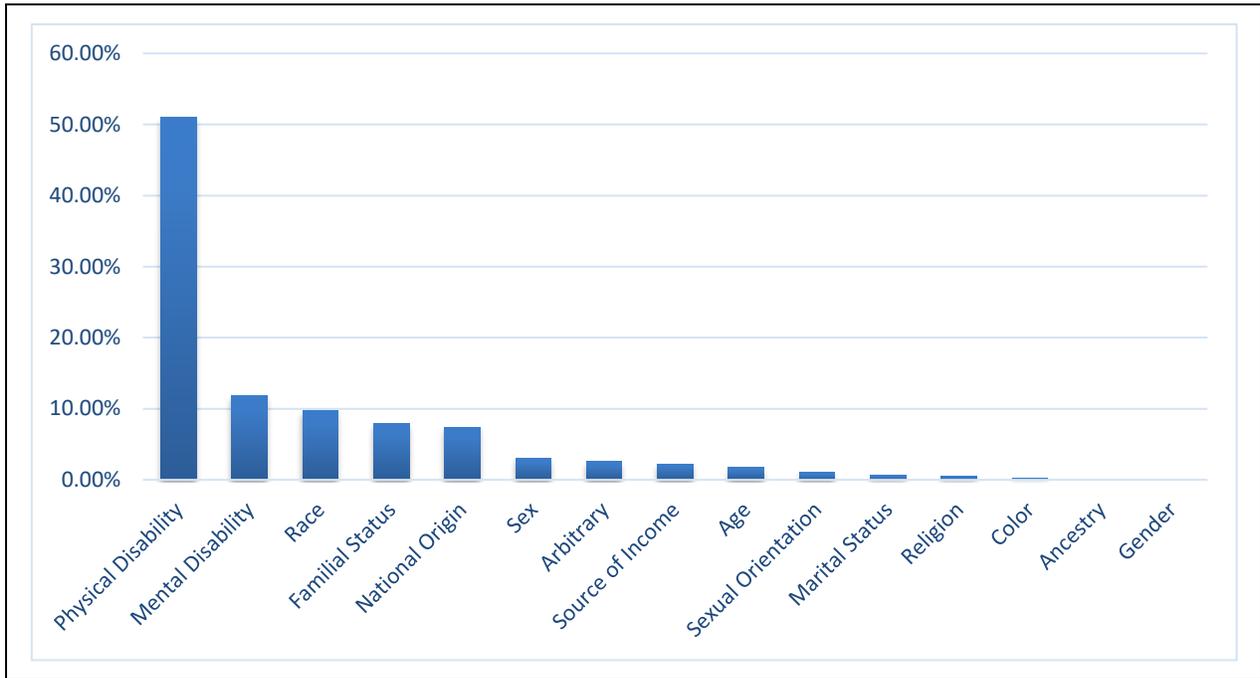
During the five-year period studied, FHCRC assisted county residents with fair housing discrimination complaints, addressing 3,108 complaints in total, with 95 percent of those from in-place tenants, 3 percent from landlords or managers and the balance from other types of complainants. Consistent with state and national trends, the leading bases of complaints included physical disability (51 percent), mental disability (12 percent), race (10 percent), familial status (8 percent), national origin (7 percent), and sex (3 percent). Taken together, complaints based on disability status accounted for 63 percent of all cases in Riverside County. **Table V-2** and **Graph V-1** on the following pages show the basis of FHCRC discrimination complaints by community during the five-year period from July 1, 2013 to June 30, 2018.

**Table V-2  
Fair Housing Discrimination Complaints by Basis and Community**

Basis	City of Riverside	City of Corona	City of Moreno Valley	City of Perris	City of Menifee	City of Hemet	City of Temecula	West County	East County	City of Palm Springs	City of Palm Desert	Total	Percent
Age	23	6	0	0	0	6	0	9	8	3	0	55	1.77%
Ancestry	0	0	0	0	0	0	0	0	0	0	0	0	0.00%
Arbitrary	32	4	4	4	1	7	2	7	11	7	0	79	2.54%
Color	1	1	3	0	0	1	0	0	0	2	0	8	0.26%
Familial Status	59	29	12	12	0	14	3	21	67	19	10	246	7.92%
Gender	0	0	0	0	0	0	0	0	0	0	0	0	0.00%
Marital Status	4	1	0	0	0	2	1	4	2	2	2	18	0.58%
Mental Disability	122	24	39	8	9	39	12	35	47	27	8	370	11.90%
National Origin	41	8	7	8	2	15	3	10	121	12	4	231	7.43%
Physical Disability	417	80	142	54	35	206	45	244	182	136	45	1,586	51.03%
Race	74	14	46	19	8	32	15	40	30	13	10	301	9.68%
Religion	6	2	0	0	0	2	0	3	3	1	0	17	0.55%
Sex	37	5	5	1	1	5	5	11	11	11	4	96	3.09%
Sexual Orientation	6	0	0	1	0	1	1	2	8	12	0	31	1.00%
Source of Income	19	8	2	4	2	13	2	7	7	6	0	70	2.25%
<b>Total:</b>	<b>841</b>	<b>182</b>	<b>260</b>	<b>111</b>	<b>58</b>	<b>343</b>	<b>89</b>	<b>393</b>	<b>497</b>	<b>251</b>	<b>83</b>	<b>3,108</b>	100%

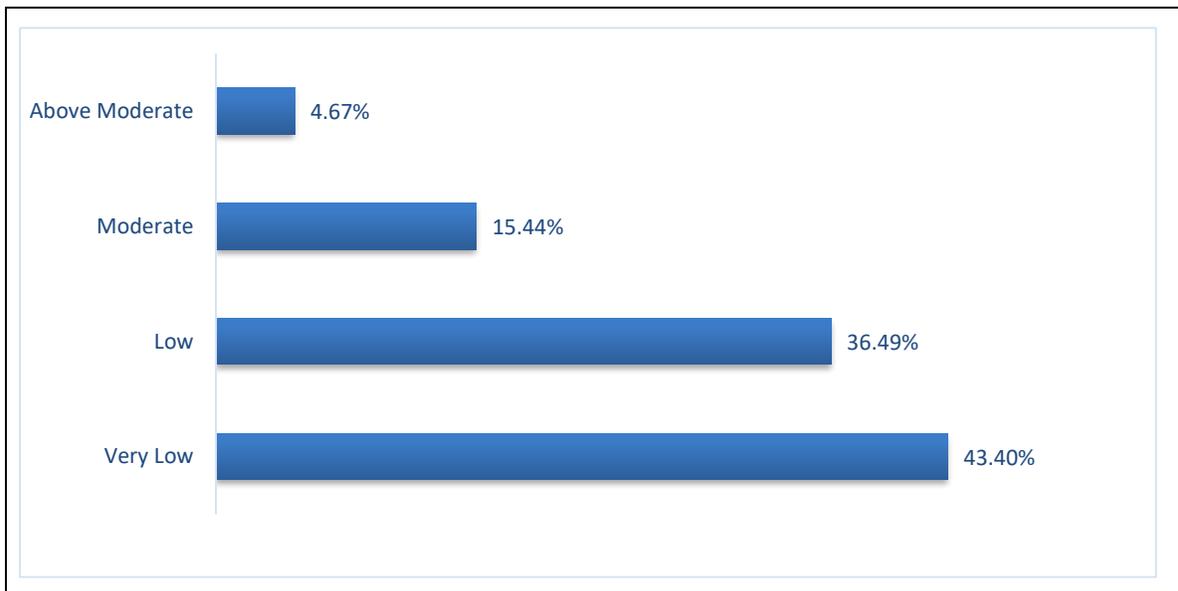
Source: FHCRC Quarterly Reports, July 1, 2013 – June 30, 2018.

**Graph V-1**  
**Fair Housing Discrimination Complaints by Basis**



Source: FHCRC Quarterly Reports, July 1, 2013 – June 30, 2018.

**Graph V-2**  
**Fair Housing Discrimination Complaints by Income Level of Household**



Source: FHCRC Quarterly Reports, July 1, 2013 – June 30, 2018.

**Graph V-2** shows that that more than 95 percent of fair housing discrimination complaints were made by low- and moderate-income households during the five-year period of study.

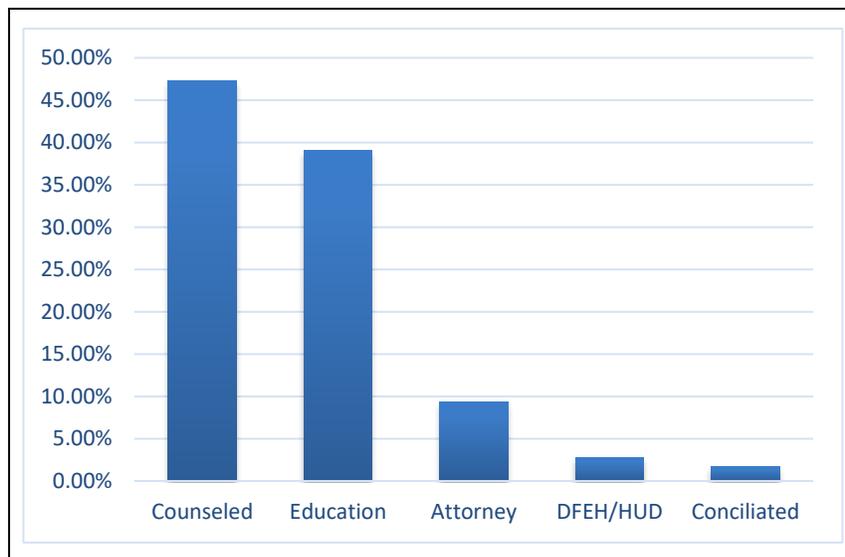
**Table V-3** and **Graph V-3** show the services rendered for the 3,108 discrimination complaints during the five-year period of evaluation.

**Table V-3**  
**Actions Taken for Fair Housing Discrimination Complaints**

Action	Number	Percent
Counseled	1,743	56.08%
Education	1,149	36.97%
Attorney	103	3.31%
DFEH / HUD Referral	93	2.99%
Conciliated	20	0.64%
<b>Total:</b>	<b>3,108</b>	<b>100%</b>

Source: FHCRC Quarterly Reports, 2014-2018.

**Graph V-3**  
**Fair Housing Discrimination Complaints by Basis**



Source: FHCRC Quarterly Reports, 2014-2018.

### C. National Fair Housing Enforcement

Under the Fair Housing Act, HUD has the authority to investigate, attempt to conciliate, and, if necessary, adjudicate complaints of discrimination involving, among other things, home sales, rentals, advertising, mortgage lending and insurance, property insurance, and environmental justice. HUD also investigates complaints alleging discriminatory zoning and land use; however, these complaints are referred to the U.S. Department of Justice for enforcement.

HUD shares its authority to investigate housing discrimination complaints with state and local government agencies that participate in the Fair Housing Assistance Program (FHAP). To participate in the FHAP, a jurisdiction must demonstrate that it enforces a fair housing law that provides rights, remedies, procedures, and opportunities for judicial review that are substantially equivalent to those provided by the federal Fair Housing Act. As of April 2019, there were 79 FHAP agencies across the country; however, the only FHAP agency in California is the State Department of Fair Employment and Housing (DFEH). In other states, county governments, municipal governments and community-based organizations are approved as FHAP agencies. HUD pays FHAP agencies for each complaint they investigate, based on the timeliness and quality of the investigation. In addition, HUD provides funding to FHAP agencies for capacity-building, training, and information systems.

A person who believes that he or she has experienced, or is about to experience, housing discrimination may file a complaint or may have a complaint filed on his or her behalf by someone else, such as a parent, child, spouse, or guardian. HUD and FHAP agencies accept complaints in person, by telephone, through the mail, and through their websites. If HUD receives a housing discrimination complaint where the alleged discriminatory act occurred within the jurisdiction of one of its FHAP agencies, HUD is required under the Fair Housing Act to refer the complaint to that agency.

If HUD determines there is reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, it issues a charge of discrimination. The parties may choose to pursue the matter in an administrative proceeding or in federal district court. If a FHAP agency finds reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, the agency or attorneys for the state or locality litigate that complaint in an administrative proceeding or in civil court.

The most recent OFHE report, *FHEO Annual Report FY 2017* found that 59.4 percent of all discrimination complaints made to HUD during the last fiscal year were based on the protected category of disability. By comparison, the percentage of complaints made to the Fair Housing Council of Riverside County for FY 2017 was 66.4 percent, a full seven percentage points higher. Race, familial status, and national origin (in that order) are the next highest bases of discrimination complaints in Riverside County and in HUD and FHAP data as well. Riverside County data is fairly closely correlated to HUD/FHAP data except that the percentage of complaints on the basis of disability is higher and the percentages in other categories is lower than HUD/FHAP data.

The following table (**Table V-4**) illustrates the breadth of HUD and FHAP discrimination complaints from FY 2014-2017.

**Table V-4  
HUD and FHAP Discrimination Complaints, 2017**

	FY 2017		FY 2016		FY 2015		FY 2014	
	No.	%	No.	%	No.	%	No.	%
Disability	4,865	59.4%	4,908	58.5%	4,605	55.8%	4,621	54.4%
Race	2,132	26.0%	2,154	25.7%	2,291	27.8%	2,383	28.1%
Familial Status	871	10.6%	882	10.5%	1,031	12.5%	1,051	12.4%
National Origin	826	10.1%	917	10.9%	898	10.9%	1,067	12.6%
Sex	800	9.8%	800	9.5%	915	11.1%	879	10.4%
Religion	232	2.8%	204	2.4%	225	2.7%	223	2.6%
Color	192	2.3%	143	1.7%	151	1.8%	146	1.7%
Retaliation	834	10.2%	785	9.4%	832	10.1%	867	10.2%
<b>Number Filed:</b>	<b>8,186</b>		<b>8,385</b>		<b>8,246</b>		<b>8,489</b>	

Source: FHEO Annual Report FY 2017, FHEO Annual Report FY 2016, FHEO Annual Report FY 2014 and 2015

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/annualreport](https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport)

**Note:** Percentages do not total 100 percent because complaints may contain multiple bases. Percentages are rounded to the nearest percentage point.

As shown in the table, while the total number of discrimination complaints has remained relatively flat over this period, the percentage of complaints based on discrimination due to disability has been trending upward. Familial status, the third most common basis of housing complaints, has been decreasing over the last several years. Discrimination based on familial status covers acts of discrimination against parents or guardians of a child under the age of 18, the parent’s or guardian’s designee, and persons who are pregnant or in the process of obtaining legal custody of a child under the age of 18.

The Department of Fair Employment and Housing (DFEH) is the State agency responsible for investigating housing discrimination complaints. The Department of Fair Employment and Housing’s mission is to protect Californians from employment, housing and public accommodation discrimination, and hate violence.

In May 2003, DFEH announced a new program for mediating housing discrimination complaints in partnership with state fair housing enforcement agencies. The program provides tenants, landlords, property owners and managers through mediation in a free and timely manner. Mediation takes place within the first 30 days of filing of the complaint, often avoiding the financial and emotional costs resulting from a full DFEH investigation and potential litigation.

**Table V-5**  
**FY 2014 - 2017 Issues in HUD & FHAP Complaints**

Complaint Issue	FY 2014		FY 2015		FY 2016		FY 2017	
	No.	%	No.	%	No.	%	No.	%
Refusal to Sell	154	1.8%	116	1.4%	162	1.9%	148	1.8%
Refusal to Rent	2,268	26.7%	2,317	28.1%	2,343	27.9%	2,414	29.5%
Discriminatory Terms, Conditions, Privileges, Services, & Facilities in the Rental or Sale of Property	5,869	69.1%	5,353	64.9%	5,859	69.9%	5,640	68.9%
Discriminatory Notices, Statements or Advertisements	983	11.6%	920	11.2%	877	10.5%	829	10.1%
Otherwise deny or make housing unavailable	655	7.7%	745	9.0%	798	9.5%	813	9.9%
Other Discriminatory Acts	383	4.5%	413	5.0%	475	5.7%	608	7.4%
False Denial or Representation of Availability	220	2.6%	187	2.3%	177	2.1%	181	2.2%
Failure to Permit a Reasonable Modification	181	2.1%	179	2.2%	191	2.3%	212	2.6%
Failure to Make a Reasonable Accommodation	2,676	31.5%	2,836	34.4%	3,376	40.3%	3,366	41.1%
Non-Compliance with Design and Construction Requirements	109	1.3%	77	0.9%	67	0.8%	98	1.2%
Discriminatory Financing	399	4.7%	237	2.9%	253	3.0%	183	2.2%
Steering	80	0.9%	60	0.7%	74	0.9%	74	0.9%
Discriminatory Brokerage Service	41	0.5%	55	0.7%	61	0.7%	49	0.6%
Using Ordinances to discriminate in zoning and land use	67	0.8%	39	0.5%	24	0.3%	35	0.4%
Redlining	3	0.0%	13	0.2%	9	0.1%	6	0.1%
Discriminatory Acts under Section 901 (criminal)	5	0.1%	9	0.1%	7	0.1%	14	0.2%
Refusal to Provide Insurance	2	0.0%	2	0.0%	4	0.0%	1	0.0%
Coercion, Intimidation, Threats, Interference, and Retaliation	1,820	21.4%	1,606	19.5%	1,424	17.0%	1,456	17.8%
Blockbusting	5	0.1%	11	0.1%	8	0.1%	7	0.1%
Failure to meet senior housing exemption criteria	0	0.0%	0	0.0%	0	0.0%	3	0.0%
<b>Number of Complaints Filed</b>	<b>8,489</b>		<b>8,246</b>		<b>8,385</b>		<b>8,186</b>	

Source: FHEO Annual Report FY 2017, FHEO Annual Report FY 2016, FHEO Annual Report FY 2014 and 2015;

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/annualreport](https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport)

**Note:** Percentages do not total 100 percent because complaints may contain multiple bases. Percentages are rounded to the nearest percentage point

**Table V-6**  
**FY 2010 - 2013 Issues in HUD & FHAP Complaints**

Complaint Issue	FY 2010		FY 2011		FY 2012		FY 2013	
	No.	%	No.	%	No.	%	No.	%
Refusal to Sell	205	2%	142	2%	190	2%	170	2%
Refusal to Rent	2,405	24%	2,239	24%	2,317	26%	2,273	27%
Discriminatory Terms, Conditions, Privileges, Services, & Facilities in the Rental or Sale of Property	5,959	59%	5,674	61%	5,516	63%	5,713	68%
Discriminatory Notices, Statements or Advertisements	937	9%	784	8%	936	11%	986	12%
False Denial or Representation of Availability	256	3%	250	3%	237	3%	246	3%
Failure to Permit a Reasonable Modification	203	2%	207	2%	204	2%	194	2%
Failure to Make a Reasonable Accommodation	2,556	25%	2,408	26%	2,487	28%	2,543	30%
Non-Compliance with Design and Construction Requirements	169	2%	90	1%	106	1%	114	1%
Discriminatory Financing	511	5%	442	5%	383	4%	433	5%
Steering	84	1%	62	1%	81	1%	80	1%
Redlining	6	<0.5%	2	<0.5%	11	<0.5%	5	<0.5%
Refusal to Provide Insurance	2	<0.5%	0	0%	4	<0.5%	6	<0.5%
Coercion, Intimidation, Threats, Interference, and Retaliation	1,478	15%	1,650	18%	1,913	22%	1,884	23%
<b>Number of Complaints Filed</b>	<b>10,155</b>		<b>9,354</b>		<b>8,818</b>		<b>8,368</b>	

Source: FHEO Annual Report on Fair Housing FY 2012-2013

[https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/annualreport](https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport)

**Note:** Percentages do not total 100 percent because complaints may contain multiple bases. Percentages are rounded to the nearest percentage point

Review of **Tables V-5 and V-6** can reveal trends in housing as they combine eight years of HUD data. First, the total number of complaints made to HUD and state fair housing agencies, such as DFEH, fell from 10,155 total complaints in Fiscal Year 2010 to 8,186 total complaints in Fiscal Year 2017, representing a 19 percent decrease. However, those decreases in discrimination complaints were not evenly dispersed amongst all categories over that eight-year period. In fact, discrimination allegations based on a failure to make a reasonable accommodation to policies, rules or procedures rose by 76 percent over that period. The percentage of complaints based on a failure to make a reasonable accommodation as a percentage of the total number of complaints filed rose from 25 percent of all complaints filed in FY2010 to 41.1 percent of all complaints filed in FY2017.

**D. Hate Crimes**

Hate crimes are violent acts against people, property, or organizations because of the group to which they belong or identify with. The Federal Fair Housing Act makes it illegal to threaten, harass, intimidate, or act violently toward a person who has exercised their right to free housing choice. Some examples include threats made in person, writing or by telephone, vandalism of the home or property, or unsuccessful attempts at any of these. Again, a comparison between **Tables V-5 and V-6** reveal some interesting information about possible hate crimes related to housing. Beginning in FY2010, the total number of complaints made to HUD and state agencies based on coercion, intimidation, threats, interference, or retaliation totaled 1,478 before peaking at 1,913 complaints in FY2012 and did not return to pre-2010 levels until 2016. While the data does not indicate the reason for this spike in complaints based on coercion, intimidation, threats, interference, and retaliation, the data does suggest that discrimination most closely associated with hate crimes may be on the rise in housing discrimination, as this category of complaint still represents 17.8 percent of all complaints filed for FY 2017.

**Table V-7** summarizes the hate crime incidents by bias motivation as reported by the FBI<sup>1</sup> for calendar years 2013-2017 by law enforcement agencies in Riverside County. It is important to note that not all incidents of coercion, intimidation, threats, interference, or retaliation rise to the level of a hate crime, and even with those incidents that do, not all such incidents are reported to the police.

**Table V-7  
Hate Crime Incidents Reported to the FBI in Riverside County, 2013-2017**

Calendar Year	Race / Ethnicity / Ancestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
2017	14	6	6	0	0	0	<b>26</b>
2016	16	5	5	0	1	1	<b>28</b>
2015	12	8	6	0	0	0	<b>26</b>
2014	23	2	5	0	0	0	<b>30</b>
2013	29	7	6	0	0	1	<b>43</b>
<b>Total:</b>	<b>94</b>	<b>28</b>	<b>28</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>153</b>

Source: FBI Hate Crime Incidents by State and Agency, Table 13, 2013-2017.  
<https://www.fbi.gov/services/cjis/ucr/publications#Hate-Crime%20Statistics>.

In Riverside County, there were a total of 153 hate crimes reported to the FBI from 2013 to 2017, the most recent year data was available. The most prevalent hate crime bias motivation reported was race, ethnicity and ancestry. The relatively low occurrence of hate crimes within the County relative to its population size indicates that hate-motivation does

<sup>1</sup> FBI Hate Crime Incidents by State and Agency, 2013-2017.

not appear to coincide with incidences of housing discrimination in Riverside County and does not indicate an impediment to fair housing choice.

**E. Fair Housing Legal Status**

In the last year, no cases were reported as filed in a court of competent jurisdiction by the FHCRC to enforce fair housing laws. FHCRC was successful in addressing the fair housing cases that were investigated on behalf of County residents during this time period; therefore, there is no litigation to report.

Previous chapters of this A.I. study examined changes in the County of Riverside during the last five years, analyzed the private lending market, reviewed key public policies for impediments to fair housing, and examined fair housing statistics throughout the County. Building upon the previous analysis, this chapter recommends actions to improve fair housing choice in Riverside County. **Table VI-1** at the end of this chapter summarizes the recommendations to address the impediments to fair housing choice that have been identified, including an implementation schedule.

**A. Prior-Identified Impediment Carried Over Into the 2019 A.I.**

**Discrimination against Persons with Disabilities**

Consistent with findings in the 2014 A.I., nearly 63 percent of the discrimination complaints in the County of Riverside over the last five years were on the basis of physical or mental disability. In total, there were 3,108 fair housing complaints surfaced through the work of the Fair Housing Council of Riverside County (FHCRC) over the last five years, with 1,586 or 51.03 percent of all discrimination cases reported on the basis of physical disability and with 370 or 11.90 percent of all discrimination cases reported on the basis of mental disability. These two case categories were the leading causes (first and second, respectively) of discrimination complaints in Riverside County according to FHCRC data. **Table VI-1** illustrates the number of disability discrimination cases over the five-year period of study.

**Table VI-1  
Fair Housing Discrimination Cases in Riverside County**

Basis	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	Total
Number of Disability Discrimination Cases (Physical and Mental)	309	524	402	285	436	<b>1,956</b>

Source: Fair Housing Council of Riverside County Quarterly Reports (2014-2018).

The high proportion of disability complaints to FHCRC is consistent with other communities in the area and is also consistent with data at the state and federal level. Fair housing discrimination on the basis of disability demonstrates a lack of understanding in the housing industry of the housing rights of persons with disabilities. Disabled persons are experiencing difficulties when requesting reasonable accommodations or modifications. In particular, persons with cognitive disabilities experience significantly more problems with these accommodations.

**2019 Status:** This impediment was addressed during the 2013-2018 planning period through education and outreach to housing providers through workshops, audits, information and referrals. However, given that nearly 63 percent of all fair housing complaints received by FHCRC over the last five years

were on the basis of disability, this impediment has not been adequately addressed and remains a high priority in this A.I.

**Recommendations:** The County of Riverside and its contracted fair housing service provider should continue providing educational opportunities for property owners, property managers, and residents throughout the County to provide information concerning the law as it pertains to reasonable accommodations and reasonable modifications, which are some of the leading reasons why persons with disabilities encounter discrimination when seeking housing or attempting to maintain their housing. This could be addressed through workshops, public services announcements, literature distribution and through the provision of landlord-tenant mediation services to address potential discrimination before it occurs.

It is recommended that the County provide for, under contract, multiple workshops per year for the next five years in locations throughout the County focused on the housing rights applicable to persons with physical disabilities and persons with mental disabilities. The content of these workshops should be tailored to landlords, tenants and government officials (e.g., code enforcement, PHA staff, EDA staff), including a general introduction to fair housing laws and discrimination, and then primarily focus on forms of discrimination against persons with disabilities, such as unreasonably denying or refusing to address requests for reasonable accommodation and modification.

It is further recommended that the County continue contracting with a fair housing service provider for both discrimination and landlord-tenant services. Consultation with fair housing agencies indicates that offering free landlord-tenant services is the best way to identify more serious, but less often reported incidences of discrimination that leads to the types of large-scale pattern-and-practice cases that impact thousands of people each year and have the scale to warrant investigative and legal support from regulatory agencies.

**Responsible Entity:** County of Riverside.

**Timeframe:** Each year starting July 1, 2019 and ending June 30, 2024.

### **B. New Impediment to Fair Housing Choice**

This 2019-2024 A.I. revealed the following new impediment and recommendations:

#### **Siting and Standards for Transitional and Supportive Housing**

Chapter 4 of this A.I. studies public policies to determine if impediments to fair housing choice exist that negatively affect the ability of members of protected classes to secure or maintain housing. Review of the 2017-2021 Housing Element of the General Plan and County Ordinance 348 governing land use planning and zoning in the County of Riverside revealed that transitional and supportive housing are not currently defined in the Ordinance and are not treated as a permitted use in residential zones.

**Recommendation:** Implement Action 1.5c of the Housing Element to revise Ordinance 348 to include a definition of transitional housing and supportive housing that is consistent with State of California Health and Safety Code Sections 50675.14 and 50675.2; and, revise the Ordinance to list transitional and supportive housing as permitted uses within residential zones.

**Responsible Entity:** According to Action 1.5c, the County of Riverside Transportation and Land Management Agency (TLMA) is responsible for implementing this recommendation.

**Timeframe:** No later than June 30, 2020.

### C. Recommendations to Address Impediments to Fair Housing Choice

The recommendations included in **Table VI-2** on the following page outline the County's action plan to eliminate the three current impediments to fair housing choice identified above. The recommendations include a designated agency or agencies that should be involved in the implementation of each recommendation, as well as a target date for completion.

**Table VI-2  
Fair Housing Plan Recommendations**

Impediment	Recommendations	Lead Agency	Timeframe
<p>1. Discrimination against Persons with Disabilities</p>	<p>The County of Riverside and its contracted fair housing service provider should continue providing educational opportunities for property owners, property managers, and residents. These opportunities should provide information concerning the law as it pertains to reasonable accommodations and reasonable modifications, which are some of the leading reasons why persons with disabilities encounter discrimination when seeking housing or attempting to maintain their housing. This could be addressed through workshops, public services announcements, literature distribution and through the provision of landlord-tenant mediation services to address potential discrimination before it occurs.</p> <p>It is recommended that the County provide for, under contract, multiple workshops per year for the next five years in locations throughout the County. These workshops should be focused on the rights of persons with disabilities as it relates to their ability to obtain and maintain housing. The content of these workshops should be tailored to landlords, tenants and government officials (e.g., code enforcement, PHA staff, EDA staff), including a general introduction to fair housing laws and discrimination, and then primarily focus on forms of discrimination against persons with disabilities, such as unreasonably denying or refusing to address requests for reasonable accommodation and modification.</p> <p>It is further recommended that the County continue contracting with a fair housing service provider for both discrimination and landlord-tenant services. Each annual contract should include metrics, benchmarks and reporting requirements specific to this recommendation.</p>	<p>County of Riverside -- Contracted Fair Housing Service Provider</p>	<p>Annually from 2019 to 2024</p>

Impediment	Recommendations	Lead Agency	Timeframe
2. Siting and Standards for Transitional and Supportive Housing	Implement Action 1.5c of the Housing Element to revise Ordinance 348 to include a definition of transitional housing and supportive housing that is consistent with State of California Health and Safety Code Sections 50675.14 and 50675.2; and, revise the Ordinance to list transitional and supportive housing as permitted uses within residential zones.	County of Riverside Transportation and Land Management Agency (TLMA)	June 30, 2020

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## **APPENDICES**

- A. Signature Page**
- B. Notices and Publications**
- C. Summary of Public Comments**
- D. A.I. Survey Results**

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**Signature Page**

I, George Johnson, County Executive Officer of the County of Riverside, hereby certify that this Analysis of Impediments to Fair Housing Choice represents the County of Riverside's conclusions about impediments to fair housing choice, as well as actions necessary to address any identified impediments.

---

George Johnson  
County Executive Officer

---

Date

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**APPENDIX B**

Public Notices  
Flyers

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# THE PRESS-ENTERPRISE

1825 Chicago Ave, Suite 100  
Riverside, CA 92507  
951-684-1200  
951-368-9018 FAX

**PROOF OF PUBLICATION  
(2010, 2015.5 C.C.P)**

Publication(s): The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc.: / 3193674

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper in general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

11/14/2018

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: November 14, 2018  
At: Riverside, California

Legal Advertising Representative, The Press-Enterprise

CALIF NEWSPAPER SERV BUREAU / CALIF NEWSPAPER SERVICE  
BUREAU, CLIENT  
PO BOX 60460  
LOS ANGELES, CA 90060

Ad Number: 0011199811-01

P.O. Number: 3193674



Ad Copy:

**PUBLIC NOTICE  
RIVERSIDE  
COUNTY  
ANALYSIS OF  
IMPEDIMENTS TO  
FAIR HOUSING  
CHOICE  
RESIDENTS ARE  
INVITED TO  
ATTEND  
COMMUNITY  
MEETINGS TO  
DISCUSS THE  
COUNTY'S  
2018 ANALYSIS OF  
IMPEDIMENTS TO  
FAIR HOUSING  
CHOICE**

The Riverside County Economic Development Agency and the Housing Authority of the County of Riverside invite residents of unincorporated areas and the Cities of Banning, Beaumont, Blythe, Canyon Lake, Coachella, Desert Hot Springs, Eastvale, Indian Wells, Lake Elsinore, La Quinta, Murrieta, Norco, San Jacinto and Wildomar to attend one of four community meetings to discuss impediments to fair housing choice and how the County and other organizations may affirmatively further fair housing choice within the region.

**DATE:** December 3 (5th District)  
**TIME:** 5:00 - 7:00 p.m.

**LOCATION:** Cabazon Community Center  
50390 Carmen Avenue  
Cabazon, CA 92230

**DATE:** December 5 (3rd District)  
**TIME:** 5:00 - 7:00 p.m.

**LOCATION:** Murrieta Library Community Room  
8 Town Square  
Murrieta, CA 92562

**DATE:** December 6 (4th District)  
**TIME:** 5:00 - 7:00 p.m.

**LOCATION:** County of Riverside Workforce Development Center - Room 402  
44-199 Monroe Street  
Indio, CA 92201

**DATE:** January 2 (1st District)  
**TIME:** 6:00 p.m. or soon thereafter - 9:00 p.m.

**LOCATION:** Mead Valley Community Center  
21091 Rider Street  
Mead Valley, CA 92570

It is the objective of the County and the Housing Authority to comply with Section 504 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act (ADA) of 1990 and the ADA Amendment Act of 2008, the Fair Housing Act, and the Architectural Barriers Act in all respects. If you require public documents in an accessible format, the County and the Housing Authority will make reasonable efforts to accommodate your request. If you require a disability-related accommodation to attend or participate in a hearing or meeting, including auxiliary aids or services, please contact Kari H'Orvath at least 48 hours prior to the meeting at (951) 343-5433.

More information may be obtained by contacting the Riverside County Economic Development Agency: Telephone (951) 343-5433, Fax (951) 352-4852, via email KH.Orvath@rivco.org, or

Toll Free at 1-800-655-4228.

Individuals with hearing or speech disabilities may obtain information pertaining to these community meetings by utilizing the California Relay Service (711).

**RESIDENTS ARE INVITED TO COMPLETE A FAIR HOUSING SURVEY TO GATHER INFORMATION NEEDED IN THE PREPARATION OF THE ANALYSIS OF**

**IMPEDIMENTS TO FAIR HOUSING CHOICE**

The County and Housing Authority encourage residents to complete and return the Fair Housing Survey. Surveys are available online at <https://www.surveymonkey.com/r/riversideai> (English Language) and <https://www.surveymonkey.com/r/riversideai2> (Spanish Language).

11/14/18  
**CNS-3193674#  
THE PRESS EN-  
TERPRISE**

# THE PRESS-ENTERPRISE

1825 Chicago Ave, Suite 100  
Riverside, CA 92507  
951-684-1200  
951-368-9018 FAX

**PROOF OF PUBLICATION  
(2010, 2015.5 C.C.P)**

Publication(s): The Press-Enterprise

PROOF OF PUBLICATION OF

Ad Desc.: / 3193684

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper in general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

11/14/2018

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: November 14, 2018  
At: Riverside, California

Legal Advertising Representative, The Press-Enterprise

CALIF NEWSPAPER SERV BUREAU / CALIF NEWSPAPER SERVICE  
BUREAU, CLIENT  
PO BOX 60460  
LOS ANGELES, CA 90060

Ad Number: 0011199814-01

P.O. Number: 3193684



Ad Copy:

**AVISO AL  
PUBLICO  
CONDADO DE  
RIVERSIDE  
ANALISIS DE  
IMPEDIMENTOS  
PARA LA  
ELECCION DE  
VIVIENDA JUSTA  
RESIDENTES  
ESTAN  
INVITADOS A  
ASISTIR A LAS  
REUNIONES  
COMUNITARIAS  
PARA DISCUTIR  
EL ANALISIS DE  
IMPEDIMENTOS  
PARA LA  
ELECCION DE  
VIVIENDA JUSTA  
2018 DEL  
CONDADO DE  
RIVERSIDE**

La Agencia de Desarrollo Económico del Condado de Riverside y la Oficina de Autoridad de Vivienda del Condado de Riverside invitan a los residentes de áreas no incorporadas y a las ciudades de Banning, Beaumont, Blythe, Canyon Lake, Coachella, Desert Hot Springs, Eastvale, Indian Wells, Lake Elsinore, La Quinta, Murrieta, Norco, San Jacinto y Wildomar a asistir a una de las cuatro reuniones comunitarias para discutir los impedimentos para la elección de vivienda justa y como el Condado y otras organizaciones pudieran impulsar afirmativamente la elección de vivienda justa dentro de la región.

**FECHA:** Diciembre 3 (Distrito 5)  
**HORA:** 5:00 - 7:00 p.m.

**LUGAR:** Cabazon Community Center  
50390 Carmen Avenue  
Cabazon, CA 92230

**FECHA:** Diciembre 5 (Distrito 3)  
**HORA:** 5:00 - 7:00 p.m.

**LUGAR:** Murrieta Library Community Room 8 Town Square  
Murrieta, CA 92562

**FECHA:** Diciembre 6 (Distrito 4)  
**HORA:** 5:00 - 7:00 p.m.

**LUGAR:** County of Riverside Workforce Development Center - Room 402 44-199 Monroe Street Indio, CA 92201

**FECHA:** Enero 2 (Distrito 1)  
**HORA:** 6:00 p.m. o un poco después - 9:00 p.m.

**LUGAR:** Mead Valley Community Center  
21091 Rider Street  
Mead Valley, CA 92570

El Condado y la Oficina de Autoridad de Vivienda tienen como objetivo cumplir en todo con respecto a la Sección 504 de la Ley de Rehabilitación de 1973, tal y como se enmendó, la Ley de Americanos con Discapacidades (ADA) de 1990 y la Ley de Enmienda a ADA de 2008, la Ley de Vivienda Justa, y la Ley de Barreras Arquitectónicas. Si usted necesita documentos públicos en un formato accesible, el Condado y la Oficina de Autoridad de Vivienda harán lo posible dentro de lo razonable para dar cabida a su petición. Si usted requiere acomodo especial debido a alguna discapacidad para asistir o participar en

una audiencia o junta, incluyendo aparatos auxiliares o servicios, por favor comuníquese Kari Horvath por lo menos 48 horas antes de la junta al (951) 343-5433. Mas información puede ser obtenida comunicándose a la Agencia de Desarrollo Económico del Condado de Riverside: Telefono (951) 343-5433, Fax (951) 352-4852, via correo electrónico KHorvath@rivco.org, o al numero de Lada Gratuita 1- 800-655-4228.

Las personas con discapacidades auditivas y de habla pueden obtener información relativa a esas reuniones comunitarias mediante el servicio de California Relay (711).

**SE INVITA A LOS RESIDENTES A COMPLETAR UNA ENCUESTA DE VIVIENDA JUSTA PARA REUNIR LA INFORMACION NECESARIA EN LA PREPARACION DEL ANALISIS DE IMPEDIMENTOS A LA ELECCION DE VIVIENDA JUSTA**

El Condado y la Oficina de Autoridad de Vivienda alienta a los residentes a completar y devolver la Encuesta de Vivienda Justa. Las Encuestas están disponibles en línea en: <https://www.surveymonkey.com/r/riversideai2> (En Idioma Inglés) y <https://www.surveymonkey.com/r/riversideai2> (En Idioma Español).

11/14/18  
**CNS-3193684#**  
**THE PRESS ENTERPRISE**

**PROOF OF PUBLICATION**

**STATE OF CALIFORNIA SS.  
COUNTY OF RIVERSIDE**

CA. NEWSPAPER SVC BUREAU/CLASS  
PO BOX 60460

LOS ANGELES CA 90060

I am over the age of 18 years old, a citizen of the United States and not a party to, or have interest in this matter. I hereby certify that the attached advertisement appeared in said newspaper (set in type not smaller than non pariel) in each and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

11/14/18

I acknowledge that I am a principal clerk of the printer of The Desert Sun, printed and published weekly in the City of Palm Springs, County of Riverside, State of California. The Desert Sun was adjudicated a Newspaper of general circulation on March 24, 1988 by the Superior Court of the County of Riverside, State of California Case No. 191236.

I certify under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.. Executed on this 14th of November 2018 in Green Bay, WI, County of Brown.

  
**DECLARANT**

Ad#:0003247787

P O :

# of Affidavits :1



**PUBLIC NOTICE  
RIVERSIDE COUNTY ANALYSIS OF  
IMPEDIMENTS TO FAIR HOUSING CHOICE**

**RESIDENTS ARE INVITED TO ATTEND COMMUNITY MEETINGS TO DISCUSS THE COUNTY'S 2018 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

The Riverside County Economic Development Agency and the Housing Authority of the County of Riverside invite residents of unincorporated areas and the Cities of Banning, Beaumont, Blythe, Canyon Lake, Coachella, Desert Hot Springs, Eastvale, Indian Wells, Lake Elsinore, La Quinta, Murrieta, Norco, San Jacinto and Wildomar to attend one of four community meetings to discuss impediments to fair housing choice and how the County and other organizations may affirmatively further fair housing choice within the region.

**DATE:**December 3 (5th District)  
**TIME:** 5:00 - 7:00 p.m.  
**LOCATION:**Cabazon Community Center  
50390 Carmen Avenue  
Cabazon, CA 92230

**DATE:**December 5 (3rd District)  
**TIME:** 5:00 - 7:00 p.m.  
**LOCATION:**Murrieta Library Community Room  
8 Town Square  
Murrieta, CA 92562

**DATE:**December 6 (4th District)  
**TIME:** 5:00 - 7:00 p.m.  
**LOCATION:**County of Riverside Workforce Development Center - Room 402  
44-199 Monroe Street  
Indio, CA 92201

**DATE:**January 2 (1st District)  
**TIME:** 6:00 p.m. or soon thereafter – 9:00 p.m.  
**LOCATION:**Mead Valley Community Center  
21091 Rider Street  
Mead Valley, CA 92570

**PUBLIC NOTICE  
RIVERSIDE COUNTY ANALYSIS OF  
IMPEDIMENTS TO FAIR HOUSING CHOICE**

**RESIDENTS ARE INVITED TO ATTEND COMMUNITY MEETINGS TO DISCUSS THE COUNTY'S 2018 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

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**DATE:** December 3 (5th District)  
**TIME:** 5:00 - 7:00 p.m.  
**LOCATION:** Cabazon Community Center  
50390 Carmen Avenue  
Cabazon, CA 92230

**DATE:** December 5 (3rd District)  
**TIME:** 5:00 - 7:00 p.m.  
**LOCATION:** Murrieta Library Community Room  
8 Town Square  
Murrieta, CA 92562

**DATE:** December 6 (4th District)  
**TIME:** 5:00 - 7:00 p.m.  
**LOCATION:** County of Riverside Workforce Development Center - Room 402  
44-199 Monroe Street  
Indio, CA 92201

**DATE:** January 2 (1st District)  
**TIME:** 6:00 p.m. or soon thereafter – 9:00 p.m.  
**LOCATION:** Mead Valley Community Center  
21091 Rider Street  
Mead Valley, CA 92570

It is the objective of the County and the Housing Authority to comply with Section 504 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act (ADA) of 1990 and the ADA Amendment Act of 2008, the Fair Housing Act, and the Architectural Barriers Act in all respects. If you require public documents in an accessible format, the County and the Housing Authority will make reasonable efforts to accommodate your request. If you require a disability-related accommodation to attend or participate in a hearing or meeting, including auxiliary aids or services, please contact Kari H'Orvath at least 48 hours prior to the meeting at (951) 343-5433.

More information may be obtained by contacting the Riverside County Economic Development Agency; Telephone (951) 343-5433, Fax (951) 352-4852, via email [KHOrvath@rivco.org](mailto:KHOrvath@rivco.org), or Toll Free at 1-800-655-4228. Individuals with hearing or speech disabilities may obtain information pertaining to these community meetings by utilizing the California Relay Service (711).

**RESIDENTS ARE INVITED TO COMPLETE A FAIR HOUSING SURVEY TO GATHER INFORMATION NEEDED IN THE PREPARATION OF THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

The County and Housing Authority encourage residents to complete and return the Fair Housing Survey. Surveys are available online at <https://www.surveymonkey.com/r/riversideai1> (English Language) and <https://www.surveymonkey.com/r/riversideai2> (Spanish Language), 11/14/18

CNS-3193691#  
THE DESERT SUN



PROOF OF PUBLICATION

STATE OF CALIFORNIA SS.
COUNTY OF RIVERSIDE

CA. NEWSPAPER SVC BUREAU/CLASS
PO BOX 60460

LOS ANGELES CA 90060

I am over the age of 18 years old, a citizen of the United States and not a party to, or have interest in this matter. I hereby certify that the attached advertisement appeared in said newspaper (set in type not smaller than non paniel) in each and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

11/14/18

I acknowledge that I am a principal clerk of the printer of The Desert Sun, printed and published weekly in the City of Palm Springs, County of Riverside, State of California. The Desert Sun was adjudicated a Newspaper of general circulation on March 24, 1988 by the Superior Court of the County of Riverside, State of California Case No. 191236.

I certify under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.. Executed on this 14th of November 2018 in Green Bay, WI, County of Brown.

[Signature]
DECLARANT

Ad#:0003247840

P O :

# of Affidavits :1



AVISO AL PÚBLICO
CONDADO DE RIVERSIDE
ANÁLISIS DE IMPEDIMENTOS PARA LA ELECCIÓN DE VIVIENDA JUSTA
RESIDENTES ESTÁN INVITADOS A ASISTIR A LAS REUNIONES COMUNITARIAS PARA DISCUTIR EL ANÁLISIS DE IMPEDIMENTOS PARA LA ELECCIÓN DE VIVIENDA JUSTA 2018
DEL CONDADO DE RIVERSIDE

La Agencia de Desarrollo Económico del Condado de Riverside y la Oficina de Autoridad de Vivienda del Condado de Riverside invitan a los residentes de áreas no incorporadas y a las ciudades de Banning, Beaumont, Blythe, Canyon Lake, Coachella, Desert Hot Springs, Eastvale, Indian Wells, Lake Elsinore, La Quinta, Murrieta, Norco, San Jacinto y Wildomar a asistir a una de las cuatro reuniones comunitarias para discutir los impedimentos para la elección de vivienda justa y cómo el Condado y otras organizaciones pudieran impulsar afirmativamente la elección de vivienda justa dentro de la region.

FECHA: Diciembre 3 (Distrito 5)
HORA: 5:00 - 7:00 p.m.
LUGAR: Cabazon Community Center
50390 Carmen Avenue
Cabazon, CA 92230

FECHA: Diciembre 5 (Distrito 3)
HORA: 5:00 - 7:00 p.m.
LUGAR: Murrieta Library Community Room
8 Town Square
Murrieta, CA 92562

FECHA: Diciembre 6 (Distrito 4)
HORA: 5:00 - 7:00 p.m.
LUGAR: 44-199 Monroe Street
Indio, CA 92201

FECHA: Enero 2 (Distrito 1)
HORA: 6:00 p.m. o un poco después - 9:00 p.m.
LUGAR: Mead Valley Community Center
21091 Rider Street
Mead Valley, CA 92570

AVISO AL PÚBLICO
CONDADO DE RIVERSIDE
ANÁLISIS DE IMPEDIMENTOS PARA LA ELECCIÓN DE VIVIENDA JUSTA
RESIDENTES ESTÁN INVITADOS A ASISTIR A LAS REUNIONES COMUNITARIAS PARA DISCUTIR EL ANÁLISIS DE IMPEDIMENTOS PARA LA ELECCIÓN DE VIVIENDA JUSTA 2018
DEL CONDADO DE RIVERSIDE

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FECHA: Diciembre 3 (Distrito 5)
HORA: 5:00 - 7:00 p.m.
LUGAR: Cabazon Community Center
50390 Carmen Avenue
Cabazon, CA 92230

FECHA: Diciembre 5 (Distrito 3)
HORA: 5:00 - 7:00 p.m.
LUGAR: Murrieta Library Community Room
8 Town Square
Murrieta, CA 92562

FECHA: Diciembre 6 (Distrito 4)
HORA: 5:00 - 7:00 p.m.
LUGAR: County of Riverside Workforce Development Center - Room 402
44-199 Monroe Street
Indio, CA 92201

FECHA: Enero 2 (Distrito 1)
HORA: 6:00 p.m. o un poco después - 9:00 p.m.
LUGAR: Mead Valley Community Center
21091 Rider Street
Mead Valley, CA 92570

El Condado y la Oficina de Autoridad de Vivienda tienen como objetivo cumplir en todo con respecto a la Sección 504 de la Ley de Rehabilitación de 1973, tal y como se enmendó, la Ley de Americanos con Discapacidades (ADA) de 1990 y la Ley de Enmienda a ADA de 2008, la Ley de Vivienda Justa, y la Ley de Barreras Arquitectónicas. Si usted necesita documentos públicos en un formato accesible, el Condado y la Oficina de Autoridad de Vivienda harán lo posible dentro de lo razonable para dar cabida a su petición. Si usted requiere acomodo especial debido a alguna discapacidad para asistir o participar en una audiencia o junta, incluyendo aparatos auxiliares o servicios, por favor comuníquese Kari H'Orvath por lo menos 48 horas antes de la junta at (951) 343-5433.

Más información puede ser obtenida comunicándose a la Agencia de Desarrollo Económico del Condado de Riverside: Teléfono (951) 343-5433, Fax (951) 352-4852, vía correo electrónico KHOrvath@rivco.org., o al número de Lada Gratuita 1-800-655-4228.

Las personas con discapacidades auditivas y de habla pueden obtener información relativa a esas reuniones comunitarias mediante el servicio de California Relay (711).

SE INVITA A LOS RESIDENTES A COMPLETAR UNA ENCUESTA DE VIVIENDA JUSTA PARA REUNIR LA INFORMACIÓN NECESARIA EN LA PREPARACIÓN DEL ANÁLISIS DE IMPEDIMENTOS A LA ELECCIÓN DE VIVIENDA JUSTA

El Condado y la Oficina de Autoridad de Vivienda alienta a los residentes a completar y devolver la Encuesta de Vivienda Justa. Las Encuestas están disponibles en línea en: https://www.surveymonkey.com/r/riversideai1 (En Idioma Inglés) y https://www.surveymonkey.com/r/riversideai2 (En Idioma Español).

11/14/18
CNS-3193697#
THE DESERT SUN

**PUBLIC NOTICE  
RIVERSIDE COUNTY ANALYSIS OF  
IMPEDIMENTS TO FAIR HOUSING CHOICE**

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2018 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

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**DATE:** December 3 (5<sup>th</sup> District)  
**TIME:** 5:00 - 7:00 p.m.  
**LOCATION:** Cabazon Community Center  
50390 Carmen Avenue  
Cabazon, CA 92230

**DATE:** December 5 (3<sup>rd</sup> District)  
**TIME:** 5:00 - 7:00 p.m.  
**LOCATION:** Murrieta Library Community Room  
8 Town Square  
Murrieta, CA 92562

**DATE:** December 6 (4<sup>th</sup> District)  
**TIME:** 5:00 - 7:00 p.m.  
**LOCATION:** County of Riverside Workforce Development Center - Room 402  
44-199 Monroe Street  
Indio, CA 92201

**DATE:** January 2 (1<sup>st</sup> District)  
**TIME:** 6:00 p.m. or soon thereafter – 9:00 p.m.  
**LOCATION:** Mead Valley Community Center  
21091 Rider Street  
Mead Valley, CA 92570

It is the objective of the County and the Housing Authority to comply with Section 504 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act (ADA) of 1990 and the ADA Amendment Act of 2008, the Fair Housing Act, and the Architectural Barriers Act in all respects. If you require public documents in an accessible format, the County and the Housing Authority will make reasonable efforts to accommodate your request. If you require a disability-related accommodation to attend or participate in a hearing or meeting, including auxiliary aids or services, please contact Kari H'Orvath at least 48 hours prior to the meeting at (951) 343-5433.

More information may be obtained by contacting the Riverside County Economic Development Agency: Telephone (951) 343-5433, Fax (951) 352-4852, via email [KHOrvath@rivco.org](mailto:KHOrvath@rivco.org), or Toll Free at 1-800-655-4228.

Individuals with hearing or speech disabilities may obtain information pertaining to these community meetings by utilizing the California Relay Service (711).

**RESIDENTS ARE INVITED TO COMPLETE A FAIR HOUSING SURVEY TO GATHER INFORMATION  
NEEDED IN THE PREPARATION OF THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING  
CHOICE**

The County and Housing Authority encourage residents to complete and return the Fair Housing Survey. Surveys are available online at <https://www.surveymonkey.com/r/riversideai> (English Language) and <https://www.surveymonkey.com/r/riversideai2> (Spanish Language).

DATE OF PUBLICATION: November 14, 2018

**AVISO AL PÚBLICO  
CONDADO DE RIVERSIDE  
ANÁLISIS DE IMPEDIMENTOS PARA LA ELECCIÓN DE VIVIENDA JUSTA**

**RESIDENTES ESTÁN INVITADOS A ASISTIR A LAS REUNIONES COMUNITARIAS PARA DISCUTIR  
EL ANÁLISIS DE IMPEDIMENTOS PARA LA ELECCIÓN DE VIVIENDA JUSTA 2018  
DEL CONDADO DE RIVERSIDE**

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**FECHA:** Diciembre 3 (5<sup>th</sup> District)  
**HORA:** 5:00 - 7:00 p.m.  
**LUGAR:** Cabazon Community Center  
50390 Carmen Avenue  
Cabazon, CA 92230

**FECHA:** Diciembre 5 (3<sup>rd</sup> District)  
**HORA:** 5:00 - 7:00 p.m.  
**LUGAR:** Murrieta Library Community Room  
8 Town Square  
Murrieta, CA 92562

**FECHA:** Diciembre 6 (4<sup>th</sup> District)  
**HORA:** 5:00 - 7:00 p.m.  
**LUGAR:** County of Riverside Workforce Development Center - Room 402  
44-199 Monroe Street  
Indio, CA 92201

**FECHA:** January 2 (1<sup>st</sup> District)  
**HORA:** 6:00 p.m. o un poco después – 9:00 p.m.  
**LUGAR:** Mead Valley Community Center  
21091 Rider Street  
Mead Valley, CA 92570

El Condado y la Oficina de Autoridad de Vivienda tienen como objetivo cumplir en todo con respecto a la Sección 504 de la Ley de Rehabilitación de 1973, tal y como se enmendó, la Ley de Americanos con Discapacidades (ADA) de 1990 y la Ley de Enmienda a ADA de 2008, la Ley de Vivienda Justa, y la Ley de Barreras Arquitectónicas. Si usted necesita documentos públicos en un formato accesible, el Condado y la Oficina de Autoridad de Vivienda harán lo posible dentro de lo razonable para dar cabida a su petición. Si usted requiere acomodo especial debido a alguna discapacidad para asistir o participar en una audiencia o junta, incluyendo aparatos auxiliares o servicios, por favor comuníquese Kari H'Orvath por lo menos 48 horas antes de la junta at (951) 343-5433.

Mas información puede ser obtenida comunicándose a la Agencia de Desarrollo Económico del Condado de Riverside: Teléfono (951) 343-5433, Fax (951) 352-4852, vía correo electrónico [KHOrvath@rivco.org](mailto:KHOrvath@rivco.org) , o al número de Lada Gratuita 1-800-655-4228.

Las personas con discapacidades auditivas y de habla pueden obtener información relativa a esas reuniones comunitarias mediante el servicio de California Relay (711).

**SE INVITA A LOS RESIDENTES A COMPLETAR UNA ENCUESTA DE VIVIENDA JUSTA PARA  
REUNIR LA INFORMACIÓN NECESARIA EN LA PREPARACIÓN DEL ANÁLISIS DE  
IMPEDIMENTOS A LA ELECCIÓN DE VIVIENDA JUSTA**

El Condado y la Oficina de Autoridad de Vivienda alienta a los residentes a completar y devolver la Encuesta de Vivienda Justa. Las Encuestas están disponibles en línea en:  
<https://www.surveymonkey.com/r/riversideai> (En Idioma Inglés) y  
<https://www.surveymonkey.com/r/riversideai2> (En Idioma Español).

FECHA DE PUBLICACIÓN: Noviembre 14, 2018



# County of Riverside Analysis of Impediments to Fair Housing Choice



Dear Residents and Community Stakeholders,

Fair housing is a condition where all people, regardless of their personal characteristics, have equal access to housing of their choice that they can afford. As a recipient of federal funding, the County is required to “affirmatively further fair housing,” which means taking affirmative actions, in addition to combatting discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Residents play a critical role in addressing housing discrimination by providing the County with feedback critical to the completion of our Analysis of Impediments to Fair Housing Choice, a component of the County’s housing and community development planning efforts required by both the federal government and the State of California. Community participation is the key to crafting an effective plan to affirmatively further fair housing. There are two ways to participate:

**Take a Survey:** Residents and community stakeholders are encouraged to complete a survey about fair housing issues in the County of Riverside. Surveys are available online at:

<https://www.surveymonkey.com/r/riversideai> (English Language)

<https://www.surveymonkey.com/r/riversideai2> (Spanish Language)

**Attend a Community Meeting:** Residents and community stakeholders are encouraged to attend a community meeting to discuss how the County can be more inclusive and ‘combat discrimination to overcome patterns of segregation.’ The meeting dates, times and locations include:

**DATE:** December 3 (5th District)

**TIME:** 5:00 - 7:00 p.m.

**LOCATION:** Cabazon Community Center  
50390 Carmen Avenue  
Cabazon, CA 92230

**DATE:** December 6 (4th District)

**TIME:** 5:00 - 7:00 p.m.

**LOCATION:** County of Riverside Workforce  
Development Center - Room 402  
44-199 Monroe Street  
Indio, CA 92201

**DATE:** December 5 (3rd District)

**TIME:** 5:00 - 7:00 p.m.

**LOCATION:** Murrieta Library Community Room  
8 Town Square  
Murrieta, CA 92562

**DATE:** January 2 (1st District)

**TIME:** 6:00 p.m. or soon thereafter – 9:00 p.m.

**LOCATION:** Mead Valley Community Center  
21091 Rider Street  
Mead Valley, CA 92570

*For more information, call the County of Riverside at (951) 343-5473 or send an email to [JUGarcia@rivco.org](mailto:JUGarcia@rivco.org). Individuals with hearing or speech disabilities may obtain information pertaining to the Analysis of Impediments by utilizing the California Relay Service (711).*



# Condado de Riverside Análisis de Impedimentos para la Elección de Vivienda



Estimados Residentes y Partes Interesadas de la Comunidad,

La Vivienda Justa es una condición en la que todas las personas, independientemente de sus características personales, tienen el mismo acceso a la vivienda de su elección que pueden solventar. El Condado como recipiente de fondos federales, está obligado a “promover afirmativamente la vivienda justa”, lo que significa “tomar acciones afirmativas, además de combatir la discriminación, que superen los patrones de segregación y fomenten la inclusión de comunidades libres de barreras que restringen el acceso a oportunidades basadas en características protegidas. Los residentes juegan un papel fundamental para abordar la discriminación en la vivienda proporcionando al Condado sus comentarios críticos para la realización de nuestro Análisis de Impedimentos para la Elección de Vivienda Justa, un componente de los esfuerzos de planificación de la vivienda y desarrollo comunitario del Condado requerido tanto por el gobierno federal como por el Estado de California. La participación de la comunidad es la clave para elaborar un plan efectivo para promover de manera afirmativa la vivienda justa. Hay dos maneras de participar:

**Tome una Encuesta:** Se alienta a los residentes a que completen una encuesta sobre asuntos de vivienda justa en el Condado de Riverside. Las encuestas están disponibles en línea en:

<https://www.surveymonkey.com/r/riversideai> (En Idioma Inglés)

<https://www.surveymonkey.com/r/riversideai2> (En Idioma Español)

**Asista a una Reunión Comunitaria:** Se les alienta a los residentes y partes interesadas de la comunidad a asistir a una reunión comunitaria para discutir cómo el Condado puede ser más inclusivo y ‘combatir la discriminación para superar los patrones de segregación’. Las fechas de las reuniones, horas y lugares incluyen:

**FECHA:** Diciembre 3 (5th District)

**HORA:** 5:00 - 7:00 p.m.

**LUGAR:** Cabazon Community Center  
50390 Carmen Avenue  
Cabazon, CA 92230

**FECHA:** Diciembre 6 (4th District)

**HORA:** 5:00 - 7:00 p.m.

**LUGAR:** County of Riverside Workforce  
Development Center - Room 402  
44-199 Monroe Street  
Indio, CA 92201

**FECHA:** Diciembre 5 (3rd District)

**HORA:** 5:00 - 7:00 p.m.

**LUGAR:** Murrieta Library Community Room  
8 Town Square  
Murrieta, CA 92562

**FECHA:** January 2 (1st District)

**HORA:** 6:00 p.m. o un poco después – 9:00 p.m.

**LUGAR:** Mead Valley Community Center  
21091 Rider Street  
Mead Valley, CA 92570

*Para mayor información, llame a la Condado de Riverside al (951) 343-5473 o envíe un correo electrónico a [JUGarcia@rivco.org](mailto:JUGarcia@rivco.org). Las personas con discapacidades auditivas y de habla pueden obtener información relativa a esas reuniones comunitarias mediante el servicio de California Relay (711).*



# COMMUNITY SERVICES DIVISION

The Community Services Division oversees the operation of 60 County Service Areas (CSAs), including 21 CSAs with community advisory boards appointed by the Riverside County Board of Supervisors.

[Learn More](#)

## Riverside County Analysis of Impediments to Fair Housing Choice Survey

Please take some time to fill out this survey and help the County identify the barriers resident are facing when trying to obtain housing in Riverside County. Feedback from residents is critical to the completion of the County's Analysis of Impediments to Fair Housing Choice, a requirement by both federal government and State of California.

For more information, call the Riverside County Economic Development Agency at (951) 343-5473 or send an email to [jugarcia@rivco.org](mailto:jugarcia@rivco.org).

[Click Here](#)

[Haga clic aquí](#)

[Getting Started](#)

[EDA News](#)

[Resources](#)

[FPPC Forms](#)

[Riverside County Now](#)

### Getting Started

- [Business/Real Estate Professionals](#)
- [Job Seekers](#)
- [Fun Seekers](#)
- [Library Seekers](#)

### Calendar of Events



### Annual Report



### Cultural Services



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**APPENDIX C**

Summary of Public Comments

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**Summary of Public Comments Received  
During the Public Review and Comment Period**

*No public comments were received.*

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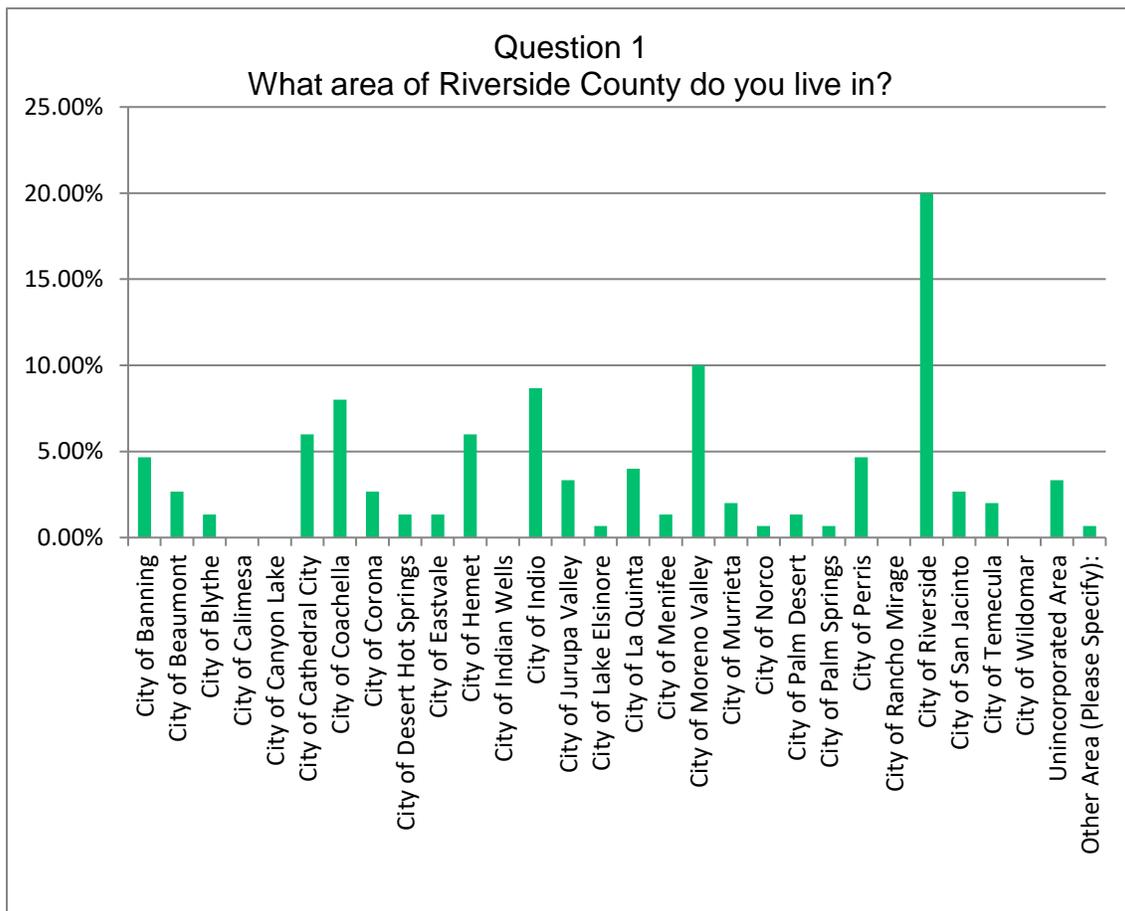
**APPENDIX D**

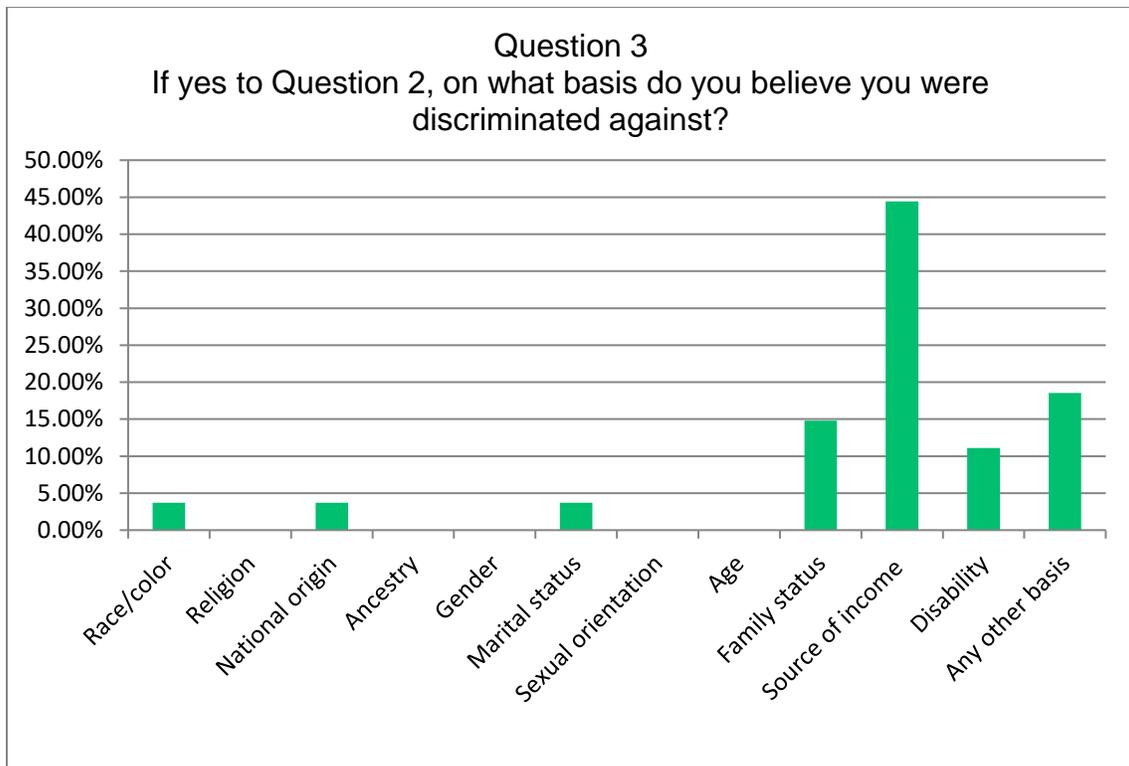
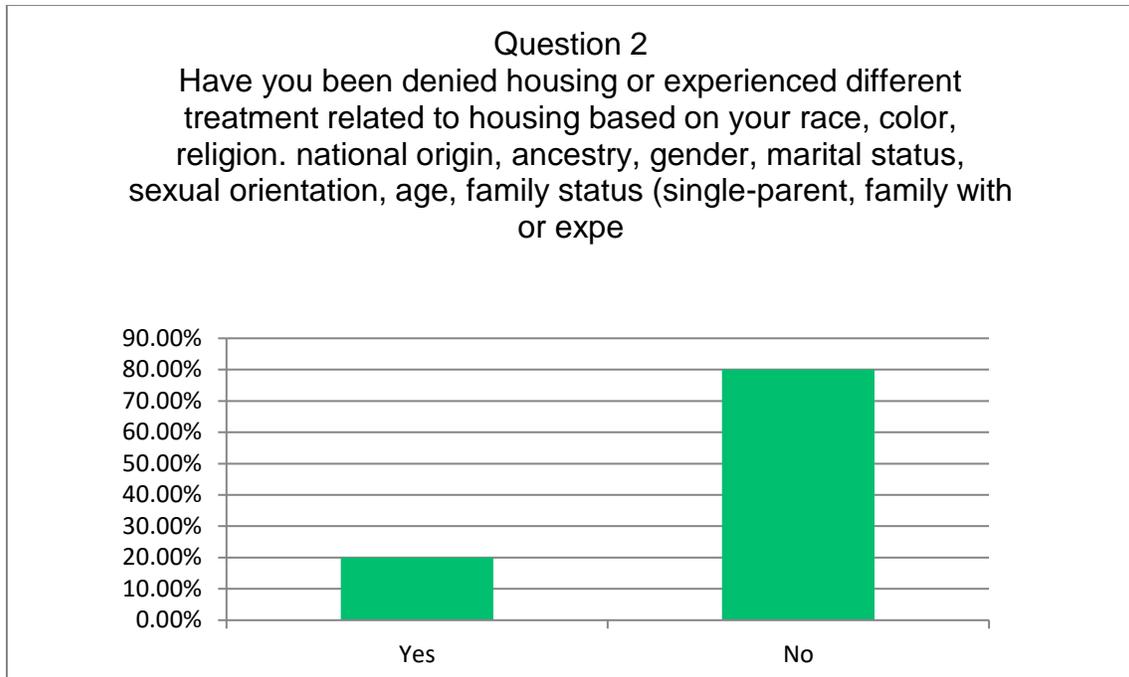
A.I. Survey Results

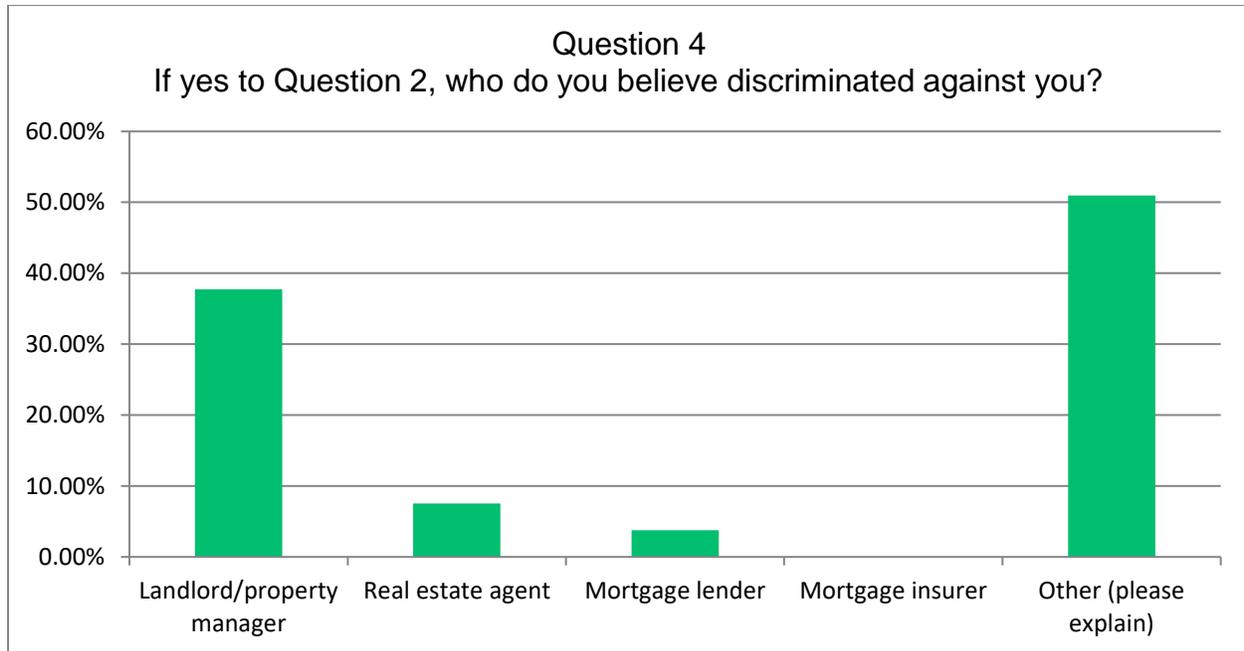
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To gain insight into resident perspectives of fair housing practices in Riverside County, the County released an “Analysis of Impediments to Fair Housing Choice Survey” to residents in November 2018. The survey consisted of 34 questions related to fair housing issues, community planning needs (such as access to healthcare and transportation), questions regarding schools and questions about the job market. Many of the questions were open-ended, allowing the community to provide additional comments beyond simply answering “yes or no.” The survey was published in English and in Spanish using surveymonkey.com. Links to the surveys were publicized in the public notices for community participation and through email distribution. The survey response period was open for approximately 75 days. During that time, 150 responses were received, many of which contained additional feedback via the open-ended questions.

The survey results for all 34 questions are included below. The responses to open-ended questions were lightly edited for readability, formatting, and removal of duplicate answers such as “none” or “N/A”. Unintelligible responses, responses containing personally-identifiable information, and responses containing inappropriate language were removed.

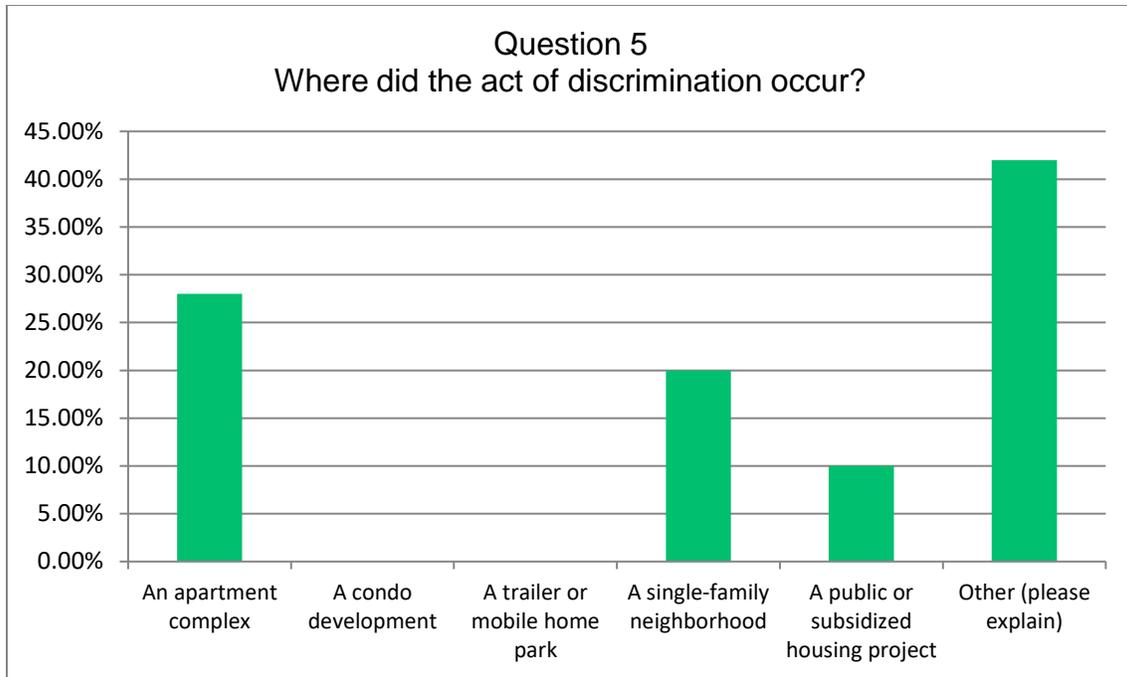






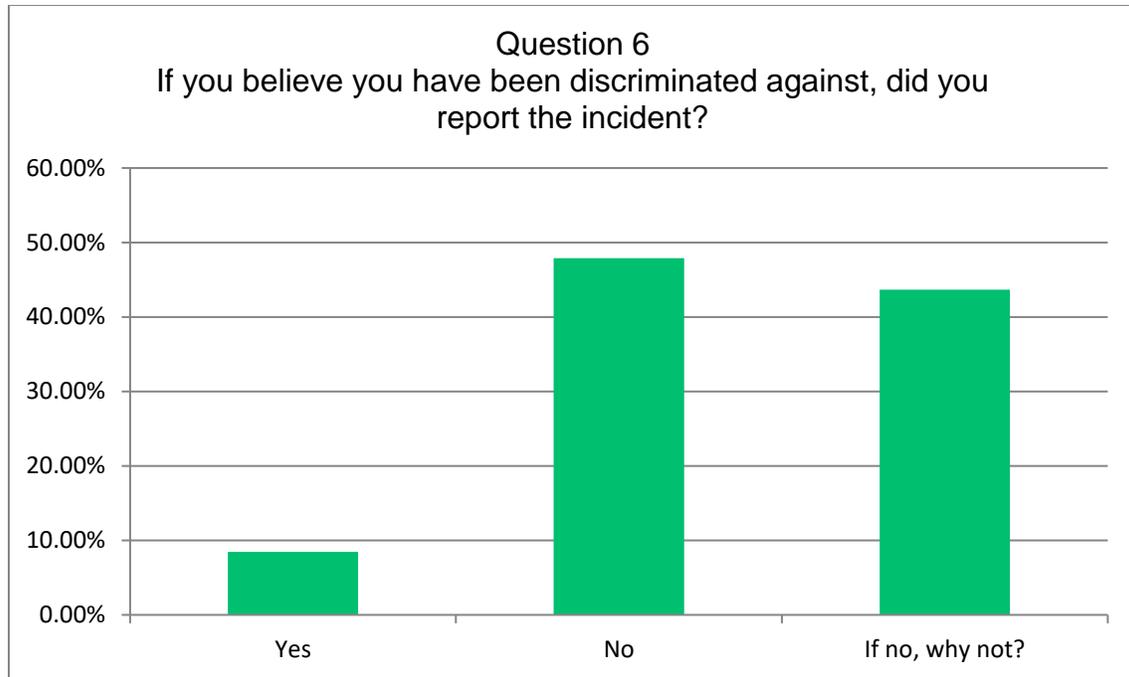
#### Other: Please Explain

- Couldn't say, I was told that cash aid didn't count as income.
- The rent was raised to above 3% of my income while on Housing Choice Voucher Program. Rent raised over \$400.00 in two years then due to no longer accepting Section 8, the rent was intentionally raised to get the lower income residents out. Upon no longer being able to afford the rent and utilities, they filed an unlawful detainer for less than what I was paying. I was paying \$575 they were only charging \$408.50 according to their paperwork. They then stated that if I move within three weeks, there is no balance owed as a settlement offer.
- All these places that say they help with hotel vouchers, they help with shelter, and can help with rental assistance is all lies.
- Owner and his family.
- Rental agencies.
- I don't feel I've been discriminated against.
- My credit is bad so I have to live in a one bedroom w my disabled sister and my daughter. I recently became disabled myself please help.
- No one
- Housing department
- Both Real Estate Agent & Mortgage lender
- I am homeless.
- None
- N/A
- CV Housing Coalition agent
- I have not been discriminated



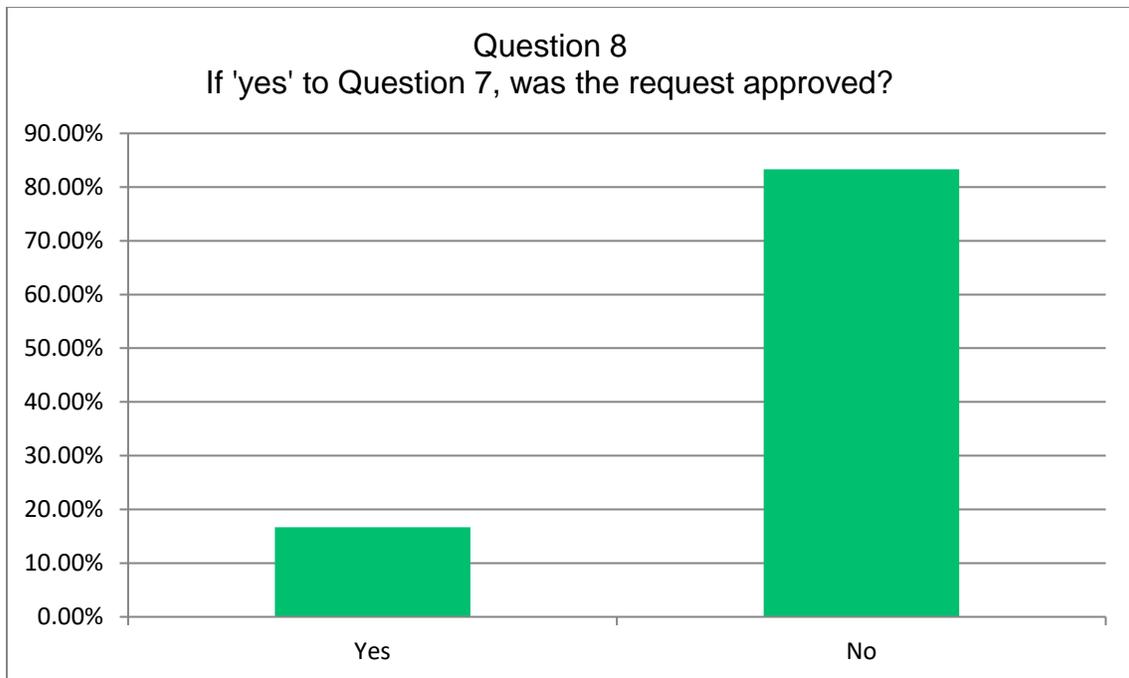
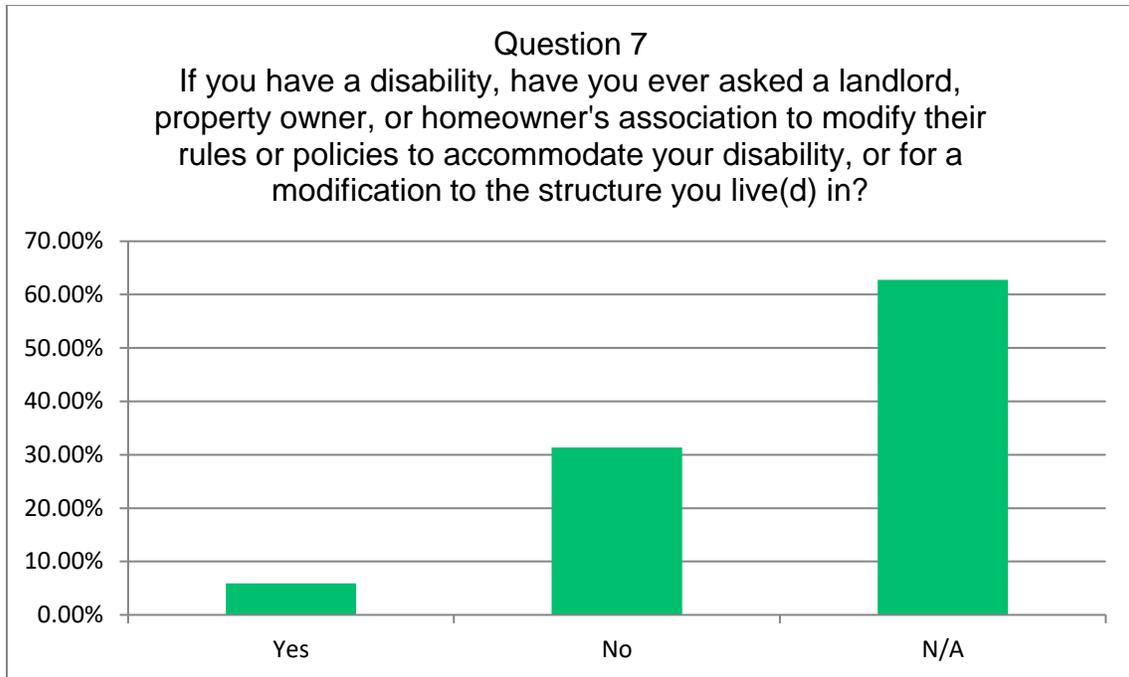
**Other: Please Explain**

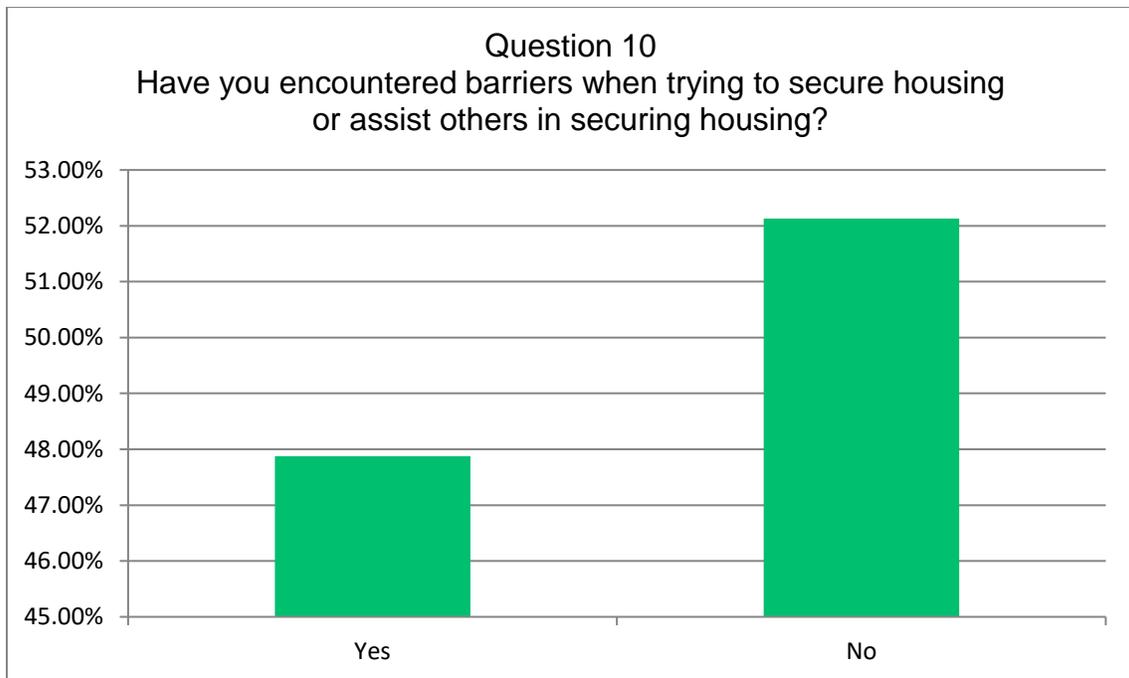
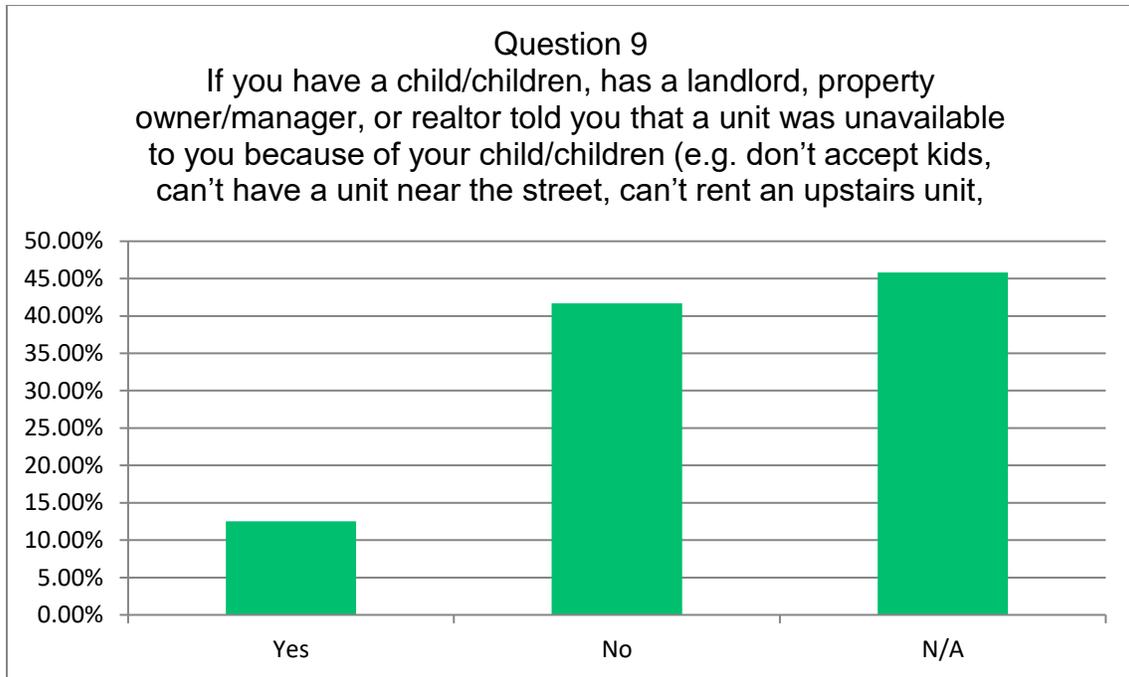
- La Pacifica Apartments, Cannon Property Management.
- 211 and the Jurupa self-sufficiency office I couldn't even get any kind of help for me and my two children that just became homeless because I receive \$647 of child support per month.
- Meadowview Apartments
- Nowhere specific just in the who rental application process
- None
- N/A
- Housing department
- No act
- En una oficina



#### If no, why not?

- I didn't know I should have.
- In the process of taking them to small claims court for the major breaches of contract concerning habitability (constant smoke-filled unit after agreed non-smoking building was offered and accepted at the time of move in).
- I do not have consistent income. I am a felon, and I have an eviction, and a dog.
- Happens too often.
- What good will it do? Calls are never answered.
- I've never experienced this. I didn't know how to handle it. Not aware of Fair Housing.
- At the time my family was in crisis and needed to find housing.
- I didn't have time to go report it. Since I'm fixed income, I believed that is the norm.
- Because I feel like I am a low-income family and the managers feel superior.
- I don't feel discriminated.
- Because they switch management too frequently.
- Because it was too close to the voucher deadline. These property managers and landlords know that participants have deadlines and can show their bias and if the participant doesn't take it, the participant is in danger of losing their voucher.
- Couldn't get ahold of any employee or my case worker to tell.
- No one to help.
- I am homeless in need of housing.
- N/A
- I could not prove this action, so I did not waste my time.
- Did not know who to report this information.





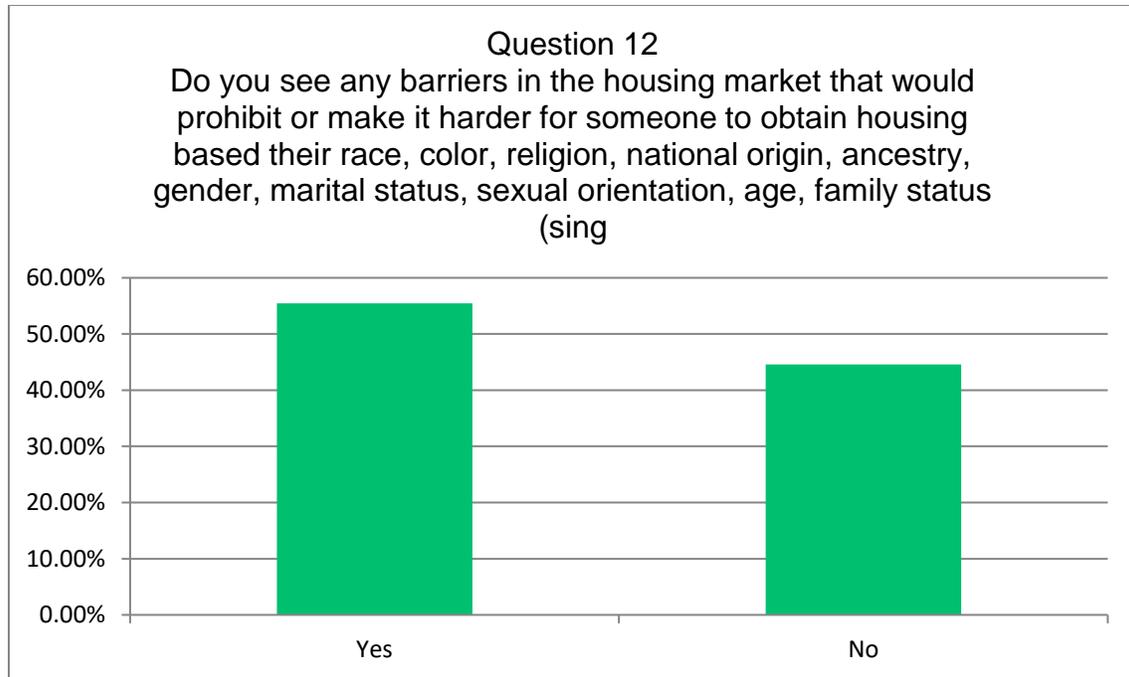
**Question 11**  
 If yes to Question 10, what barriers?

Open-ended responses:

- Criminal history

- Some of the barriers are: prices of units too high; very few affordable apartments available; not enough work history; bad credit.
- I have been on some type of housing program and not sure which it is but due to the policy of its term I cannot move to a bigger unit. I've been in this unit for years and have four children. I've called emailed wrote letters etc. But I am back to square one. What other options do I have?
- Most low-income housing require a \$1,000/Mo. minimum income. My combined income (SS & SSI) is just below that. I can't qualify anywhere. My property is being sold and I must leave! I'm almost 67 years old and I have no family that will help me. I don't even know where to start. Please help!
- Having a previous eviction, income source, lack of affordable options in the area.
- Low income housing or landlords willing to work with housing programs
- recently was evicted and denied for a property management due to credit score on my part and my dad not making enough on his own
- inadequate housing allowance. long waiting lists
- The rent is too high for a single mother with children.
- A large number of managers no longer accept Section 8 Housing Choice Vouchers due to the activities of others who may not truly appreciate the opportunity that this program provides.
- Pets, Felony record and cost.
- Not hearing back from agency, nor any kind of follow up. Have been on list longer than 6 months and heard nothing on my status or where I'm at on waitlist.
- Because I receive child support in the amount of \$647 for the two kids a month.
- Not enough money to pay rent due to rent being too expensive
- First some of the employees don't know if your concerns are fair housing or HUD-related.
- I had issues with management because of my appearance.
- no consistent income, eviction, felon, and a high-risk breed dog.
- Credit is not good enough, single income is too low, no rental history due to living on site for employment, cannot afford a home large enough for my family in a safe area close to children's schools.
- Most apartments or houses don't accept Housing Vouchers. They scoff when you even ask. It's a little disparaging.
- Cost and availability. Many landlords, etc. do not wish to work with social agencies. As an example, there are certain programs that pay rent for those in mental health programs. If able to pass barrier that income may not qualify and program will assist/pay full amount, once the knowledge of the program type is provided, there is often a change in attitude due to the perception/stigma of a person in need of mental health services.
- Having to have more than one person living with you in order to rent a 2+ bedroom home.
- Not exceeding a certain salary.

- Not being allowed to have children on the property.
- Extremely long wait list that never moves.
- Sometimes landlords/property management do not like to rent to people with children
- Low self-esteem with serious depression
- Financial SSI income shows too low and I have bad credit nor enough for security deposit
- My husband is disabled and has a legitimate service dog (certified thru Riverside County Animal Control Tag) and we have encountered numerous obstacles when trying to secure housing. We were served a notice to vacate from our previous home because of the service dog.
- I am a single mom, recently divorced recently became disabled and my credit is bad. I pay a grand to live in a dump and my sister is disabled as well. We need more affordable housing fast. Please.
- Weathering apartment after 5 years not done floor haven't been done since before the last tents mildew smell under carpet under sink.
- Property managers and landlords tell you they will fix a few minor things before inspection. Day of inspection nothing's been fixed. Even after inspection, they will do things like take the metal covering off the dishwasher drain so that when you run the dishwasher the water runs all over the counter. Then the landlord and property manager say they fixed it but they took the piece so that the appliance does not function properly. So the participant faces telling what the landlord and property manager did or just not use the dishwasher and keep the place and use the voucher and continue the stress of looking for another place to live that is unbiased towards participants based on race or level of income.
- Denied any assistance even when I been eligible for multiple housing programs
- Can't seem to contact Section 8 applied and have confirmation.
- Source of income and/or my 15-year-old daughter.
- Cost of living. There isn't enough affordable housing within Riverside County. Working a job making close to \$50,000
- It is still difficult finding housing.
- SSI not enough for a rental
- Income
- High rents
- financial barriers like high deposits, high housing cost
- Affordability
- Market is too high as far as rent prices. It is difficult to find housing for lower-income households
- Rent for most units available is just not affordable. We need more programs to assist low income family that can't afford these high rents. And we need to build more affordable units in the City.
- Income being too high, and not being elderly



**Question 13**  
If yes to Question 12, what barriers?

Open-ended responses:

- Source of income
- Prices too high for valley incomes
- Decrease supply of available rental units
- Based on me being a single mother of four. I don't agree much with the placement of housing in a high crime neighborhood and my children going to a school where they must deal with other making fin of the color of their skin
- Stop only catering to Veterans
- Criminal history
- Getting printed info. It would be nice to be able to have the information to really study it or go over it so that I don't have keep calling the workers. Who, as a matter of fact, don't always call back within 48 hours.
- Income
- Not making enough to apply for a place and bad credit
- Units not available to the elderly because of age
- Programs not available in RVC that are available in other counties, such as, using the voucher to purchase a home.
- Low voucher amount
- Because there isn't a two person household or family is trying to help them with their rent. I have been denied renting a home for me and my children.

- Relating to race and income
- The Gentrification of Moreno Valley.
- Cost of living and qualifications to rent
- There is racism and prejudice against African Americans in housing or low-income living units.
- Lots of homeless Vets
- In my case for an error of who ever took care of application had to wait more time and was offer an apartment 3 hours from doctors and was told take it or you out the waiting list.
- Mental health issues I have been plagued with.
- Landlords want people to make 2.5 - 3 x the monthly rent for income, that's nearly impossible.
- Discriminations of these kind happen to all poor everyday without fail. We have no voice and no one has the time for us. We are of no value to anyone.
- If you are a recipient of SSI/SSDI or TANF, the landlords seem to treat you differently. I've noticed they ask more invasive questions. For example, "Do you plan on being on that, till it runs out?" "Why are you on that?" If you have children. "Are all of your children by the same father?" "Do you plan on having more?" and "Do you have a boyfriend?"
- Ingrained perception of the population in need of/qualified for particular social programs such as those that offer assistance to parties dealing with mental health.
- Income, cost of living, rising rental prices
- Being too young, not having enough credit, student loans.
- Disability, income, rents are too high...can't afford.
- income requirements and credit score
- The lack of fair treatment for mentally ill when we report a problem with land lord
- Income requirements
- There are many. Race, Age, disability, income and familial status, sexual orientation and plenty more.
- The cost of living is high and the wages out here are low.
- The energy allowance for some reason stopped after child came and my rent went up.
- There is not enough quality housing since the year 2013. The housing available is private landlords that are always hawking dilapidated units on Section 8 like renovated garages or renovated storage sheds. The decent places to live have waiting lists that take years. Also, requiring double deposit is a huge barrier because there is no requirement for the landlord to return the funds even if the place is left in immaculate condition. The place I moved to charged a one-month deposit, however, I had to use my own money to purchase extra cleaning supplies and rags to use my labor to clean a filthy unit but there was nowhere else to use the voucher. I got a place that had two other applications already turned in and my family was the third application and was accepted. I constantly move because of discrimination and never see the deposit monies returned.

- The amount of rent now days are way too high for anyone to afford. Hardly no jobs or it's hard for anyone to get one. The family size to big, you have to make at least three times the rent.
- Homelessness, wrongful misdemeanor.
- High down payments for single parent of a low-income family.
- Source of income is a major obstacle, people do not want to rent to a person on cash aid, they think you're going to lay around all day using electricity and trashing the place.
- The language
- Source of income may be limited to federal assistance programs.
- Affordability and because of NIMBYism! Also, the homeless population, with multiple barriers, have few options because of the NIMBYism in SW Riverside county.
- Perception of culture based on ethnic origin and family size.
- Rents are really high right now and the rental market is very competitive, therefore it is hard to find housing for someone that does not have consistent long-term income
- Not enough affordable units. People are priced out of the majority of the inventory of available rental housing units.
- Por los ingresos
- Costos de renta muy altos

Question 14

What suggestions do you have for increasing housing or homeownership opportunities in the County of Riverside?

Open-ended responses:

- I think that housing should be more affordable to families that live and work in Riverside County. In the Desert Areas, I think more and more people are owning homes to rent out on apps like Air B & B for the season and the concerts. That takes a great deal of the properties that used to be on the market for families to rent or own. Houses in the local market should not be used for short-term rentals like hotels. That is what hotels are for.
- My opinion would be to encourage those who are on welfare or unemployment that it's okay to have a job. Take note that the longer they go without a job the more comfortable they become with only paying a certain amount for rent. Government assistance should not last forever. I believe housing programs should help those grow into homeownership rather than simply paying half of their rent.
- We are in desperate need of safe, affordable, senior housing. Can you please help me to get started in the process of securing housing right away?
- More rent-to-own opportunities or more low-income housing.
- Take a look at what limited options are available in the area, some with 3-year wait lists. Consider rezoning 55+ areas as this is no longer a predominate housing need in Riverside County.
- More housing for the working class.

- Don't make it so hard to qualify to borrow or lease. The minimum qualifications are too high!
- Make the voucher to purchase a home easier to access. Increase the voucher amount to be more realistic compared to the private market. The low voucher amount in RVC is almost assured to cause the voucher holder to fail in finding safe and well maintained housing.
- I am on a low-income fixed budget and cannot afford any apartments in Cathedral City or any other areas in California. I have two children, my son and I both have disabilities with nowhere to live. I have a Masters degree in Education but find it hard to get employment because I am my son's caregiver. Why is there no affordable housing help in California for people like me?
- Build more quality, affordable housing and assistance programs for lower income residents of Moreno Valley and Riverside who are in transition from poverty to reentering society as working adults and or students contributing to society.
- Homeownership will help to curb costs of rent increases. More opportunities on assistance in qualifications for homebuying. Opportunities for new homebuyers.
- Follow-up with calling people back, build more low-income units in good neighborhoods, implement programs to help people rebuild self-sufficiency to afford apartment units and/homeownership.
- Lower prices. People are experiencing the same wages but higher rent and housing costs.
- They should listen a bit more to tenants because we are abused and have been taken advantage of.
- Build income-based housing first for all of us families who are living in motels and in the street. Give job placement that does not require background checks or drug test. Felon, eviction, and pet friendly housing at reasonable cost. Plenty of vacant homes for sale in the county, buy them and rent them to families in need.
- Raise wages so that one person alone can rent or own and not have to rent a room or live 3 generations deep just for shelter and have no security or a chance at a normal life.
- Job security and growth, creating workshops residents can attend for first time home owners with Q&A.
- The main reason a lot of people do not move is high number of crime and homeless people. There are streets with no lights which have not become dumpsters. Because of that the values of nice homes are falling down. Also the gas prices are higher compared to Orange County. If you can sort this out we will have huge number of people moving into Riverside County.
- More housing options in this area.
- Less restrictions on who can stay on the basis of pay or dependents.
- Affordable and newly renovated places to stay that require the landlord or manager to be present at least 4 times a week.
- For every developer that builds a home or an apartment complex, a percentage of that housing development should go towards people with low income or the elderly.

- Build more housing units in Riverside County since we have the land out here that way there would be enough units for the people that need it, maybe even make a new program where people on housing can automatically become a first time home owner maybe with the new programs that the county creates, that way people don't stay on housing for a long time and miss out opportunities and maybe that we can stop poverty, because the poverty level in Riverside County is very high, and it is very embarrassing. The Community Action Partner Heroes offers a program where they help you become a first-time home buyer, and they fix your credit and they assist you with a down payment, but you have to save some money on your part, like a deal, maybe City of Perris can offer something like that.
- Take our concern in a seriously and respond promptly.
- Housing choice voucher should be used toward rent to own or purchasing a home.
- N/A
- Better-educated landlords and property managers.
- All the housing is almost completely gone in Riverside and all that is left is dilapidated housing from private owners. More affordable housing is needed where the family can live longer than one year. If you're going to make participants pay a full rent of deposit, the landlords and property managers need to make the unit clean at their expense not the participant. If you're going to make participants pay a double rent deposit, then you need to make it mandatory that the participant gets their funds back when they place is left clean and in good condition. Homelessness is very real and I am grateful for the program but it is not what it used to be because decent housing is no longer available.
- Help those who are single parents, it's also hard for them to fix or pay off bad credit. If the housing can at one time deal pay or remove all negative items on credit it will be a lot easier for them to get approved for a home help show them how to be responsible and dependable person how to learn to budget their money
- To help those in need especially when it comes to their children being taken, for no having proper living standards based on CPS needs/ regulations
- More assistance to single parents with credit scores not too good but trying to have a home secure for family.
- Other than the opportunities to have more affordable housing, the programs available for homeownership need to be publicized in an effort to reach more people.
- Make it possible to get information on your status when applying for housing assistance.
- Consider evaluating policies that regulate pricing or look into funding such as grants that can assist in providing funds for affordable housing.
- Make assistance programs more attainable for people. The threshold for income could be increased.
- More first-time home buyer programs that tailor to moderate families that can afford mortgages but have too high income.
- Different types of housing opportunities like group living or smaller homes. Housing that provides support to people who need it for mental health, single parents, elderly.
- More support to NGOs (particularly self-help affordable housing developers) who can help leverage and multiply government support to then build more affordable housing

units. Grassroots organizations like Habitat for Humanity can provide a low-cost way to increase housing while helping people change their belief system on what they personally can achieve. There is clearly a housing shortage locally and in California to the tune of over 185 k units per year. While ALL housing solutions are needed to address different barriers, self-help home ownership offers multiple solutions to the housing problem overall. First, when contrasted with subsidized rental, self-help home ownership takes people out of entitlement programs by allowing them to acquire wealth, stabilize costs and increase self-esteem. Subsidized rental programs often perpetuate the need for subsidies long term because the gap between subsidized rental and fair market home ownership is just too wide. Self-help home ownership literally stops the need for outside support. In some cases, self-help homes built serve three families: the family from subsidized rental that now becomes a homeowner, the family that moves from temporary housing into the formerly occupied subsidized unit and a homeless family who can now occupy temporary housing. Self-help housing is the back door that gets families permanently out of subsidizes. It is a permanent solution, not a band aid. Secondly, self-help homeowners now contribute to the tax base, their health improves, they become more mindful contributors to the community at large. They advance in their jobs, their kids graduate and more. These are documented outcomes. Families are given hope and they thrive. Thirdly, the community is improved and revitalized when units are strategically placed. In the past, home ownership has received the smallest proportion of funding when compared to subsidized rental or homeless programs. Raising the ratio of dollars in this direction offers the stated benefits and saves the County long term.

- Development fees are one of the biggest barriers to building additional affordable housing in California in general and definitely in the County of Riverside. Consideration of reducing or eliminating fees would help increase development.
- There is a lack of opportunities for families when competing with investors. There should be an incentive for a seller to give priority to a family vs an investor, especially foreign. County should offer a tax break or something to give seller willingness to take the offer of a local family. I have seen many people outbid by big pocket investors.
- We need to increase the affordable housing stock.
- Local dedicated funds need to be made available for the creation of more affordable housing units. State and Federal government also needs to make more funds available at the local level. Competing for State and Federal funds is challenging when most of the funds go to coastal jurisdictions. We have our own challenges here in the Inland Empire.

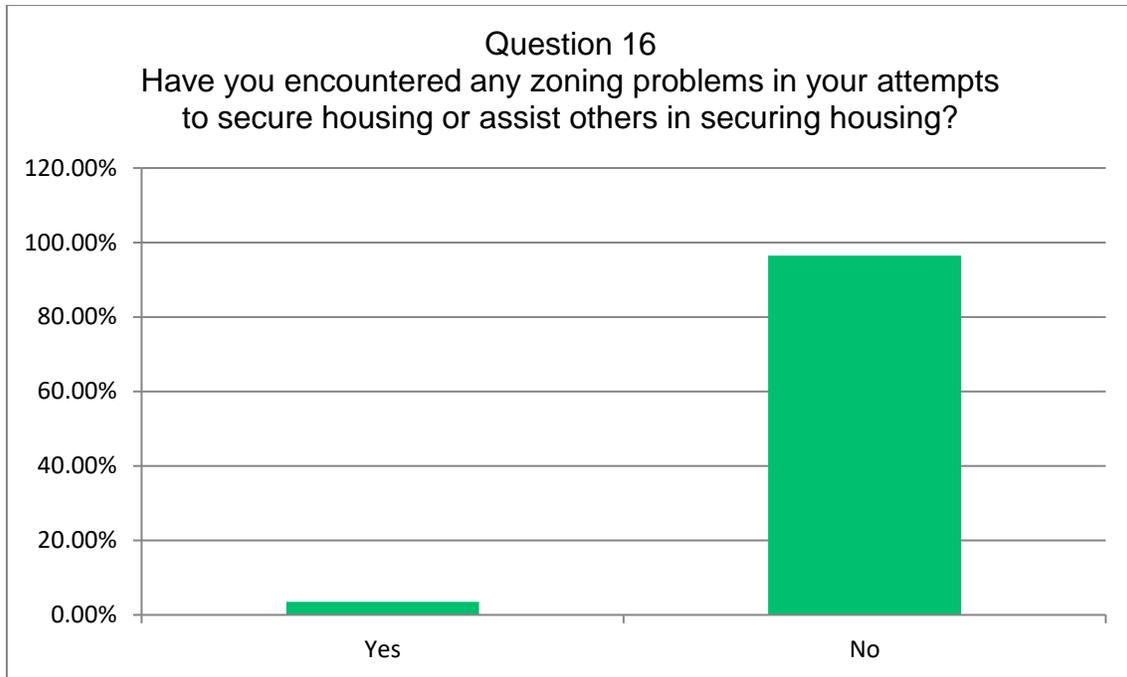
## Question 15

What barriers, if any, do you see to establishing a requirement that new housing developments in the County of Riverside have a set-aside for low-income households?

Open-ended responses:

- Investors may want higher returns than what can be offered in the low-income markets.
- Its only for senior citizens and military veterans.
- A lot of homeowners don't really seem to want the low-income housing near them.
- The barrier would be that landlords want top dollar for the units, rather than work with Federal Government and local governments to house low to very low-income tenants.
- None really.
- Unwillingness of investors/developers.
- I don't see any barriers except the bias of the private market in regard to the “quality” of the voucher holders, such as, hygiene, lifestyle of low values etc.
- That there needs to be more low- income housing apartments and townhomes built so that people can afford to live on their own.
- There is not enough affordable housing available and the waiting list for affordable units are one to five years.
- There shouldn't be any barriers to such a requirement as it is desperately needed by residents of Riverside County. The only one I can see is the gentrification of Moreno Valley.
- They are not on the tenant's side that's for sure.
- There should be no barriers.
- My income is too low to afford a home large enough for my family. Or my income is too high to qualify for housing.
- Murrieta at the Monte Vista Apartments is a good example of waste. Out of 64 units only 11 are low income. Yet 100,000 people need those 11 apartments. Pretty self-explanatory.
- I see none, the program would need to be well regulated and the employees and general public educated.
- None, possibly only funding barriers if any. But this would allow housing security for low income families and individuals.
- Most of the low-income people are either involved in drugs or crimes. There are few percentage of low income people who try hard to change their situation, keep surroundings clean and be involved with their own life rather than stealing or planning to hurt someone for a little amount of money.
- High interest rates.
- If done correctly, it can be done. Maybe, an incentive of some kind towards the Developer if they do build and include housing for ALL people of ALL economic levels it just might encourage developers to include this kind of theory into their plans.

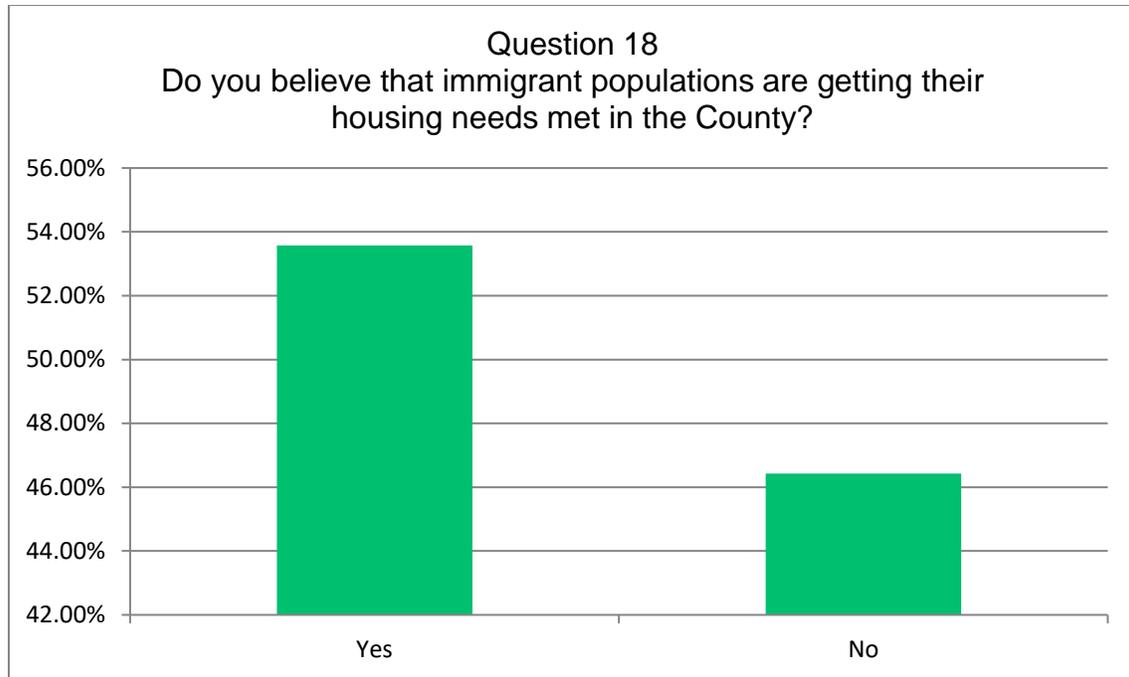
- The waiting list is too long and people don't update their personal information because all of them live like homeless.
- None if it is legitimately going to help those who cannot afford stable housing.
- Greed. People with fixed incomes can't afford first and last months and deposit and make two times the rent plus all the other bizarre requirements and hoops we have to jump through.
- Too much paperwork that's no since and lack of management in handling paperwork.
- The barrier would be long waiting lists that take years.
- Credit Scores/ Waiting Lists
- Current homeowners in the area of developments concern of property values dropping.
- The truth. Welfare recipients, I have found, are usually destructive and have no respect for other people's possessions or property.
- None.
- The guidelines are too strict. There should be more flexibility.
- Residents might not be open to the requirement based on the notion that low-income housing may bring crime to the communities.
- Educating developers and lenders on the County programs
- The only barrier I see is that developers will say they cannot afford it. It is a good idea and should be required to include low income units in all new developments.
- You will always have the NIMBYism but when you explain the success stories and the arguments I pose in the last question, it makes sense. It is all in the messaging but give recipients an out with more funds to self-help housing.
- In order to have developers build affordable housing, fees by the city or county need to be reduced to insure housing can be built at a reasonable cost. My guess is that the cost of building a home has approximately 30% of that cost associated with fees from different agencies.
- I totally support that.
- Pushback from corporations, investors. Lack of available funds to help further.
- There are quite a few barriers...the main barrier is the lack of desire to develop affordable housing and NIMBYism.
- Elected officials have not shown to be in favor of inclusionary housing in the past, that needs to change. We need to attack this huge problem on all fronts, and inclusionary housing is one of those tools.



**Question 17**  
If yes to Question 16, what problems?

Open-ended responses:

- Criminal history
- A lot are 55+
- N/A
- Don't want to rent
- Because I receive child support / and I can't receive any kind of help or assistance due to that.
- Not having enough credit renting for the first time
- When trying to get help, questions fall on deaf ears.
- All housing is out in the desert, not enough affordable housing inland.
- Socioeconomic
- Everything
- Low credit score and high down payments
- Most of the state funding requires development at a high density, 30 DUA's, and most local regions do not allow development to occur at that level
- Housing Element does not designate enough designated areas for affordable housing.



**Question 19**  
If no to Question 18, why not and what can be done to increase housing opportunities for immigrants?

Open-ended responses:

- Immigrants are here to live a better life and yet how can they apply or become a citizen with proper documents and due to that they are being denied for housing
- I don't know.
- Possible discrimination due to the political climate and alienation of immigrants.
- More low-income housing.
- Less restrictions on funds funding sources.
- In today's environment I'm sure it is harder for immigrants to obtain adequate housing. Not sure what could be done except for trying to educate those who discriminate against others.
- Don't know.
- Nobody – immigrant or not – is getting their housing needs met. Rent is too expensive, there are very few houses available for rent, and apartments want a ridiculous amount of money and very high expectations.
- I don't believe it because you need to a citizen to receive assistance. Honestly, immigrants come to this country to work. They would rather work for their own because that's the culture. We Americans are accustomed to having “help” whenever we need it or want it.

- From personal knowledge of some families living situations. I am not sure what can be done at this time as there is a general distrust among this population and coming forward for government-related programs does not seem advantageous for the immigrant population.
- Information barriers; immigrants may fear that they cannot apply for apartments or housing units because of their status. If this population would know of their rights they would be aware of what they can access.
- Break down language barriers, find people who are sincerely passionate about helping immigrants.
- Assistance (in various programs) in helping them get adjusted into a new country will help. It would be from the very minute they get here until they are finally and able to live on their own without the assistance or help.
- Help them establish credit so they can have a credit score.
- Be more organized and lenient.
- Creating more affordable housing programs.
- I don't know specifics but, I see too many shared homes with multiple families.
- Not sure.
- It is harder for them to secure and afford housing.
- Build more affordable housing projects.
- Lack of knowledge of available housing and assistance programs hurts immigrants
- Increase housing stock so that there are more opportunities for people on the lower end of income spectrum.
- They are afraid.
- Establish communities where walking and local commute can meet needs of parks, grocery stores and create a sense of local community.
- More funding to build affordable housing.
- Immigrants, particularly the ones that don't speak English have a harder time obtaining affordable housing.
- Construir mas casas

Question 20

What suggestions do you have for providing long-term, sustainable housing for the homeless population in the County?

Open-ended responses:

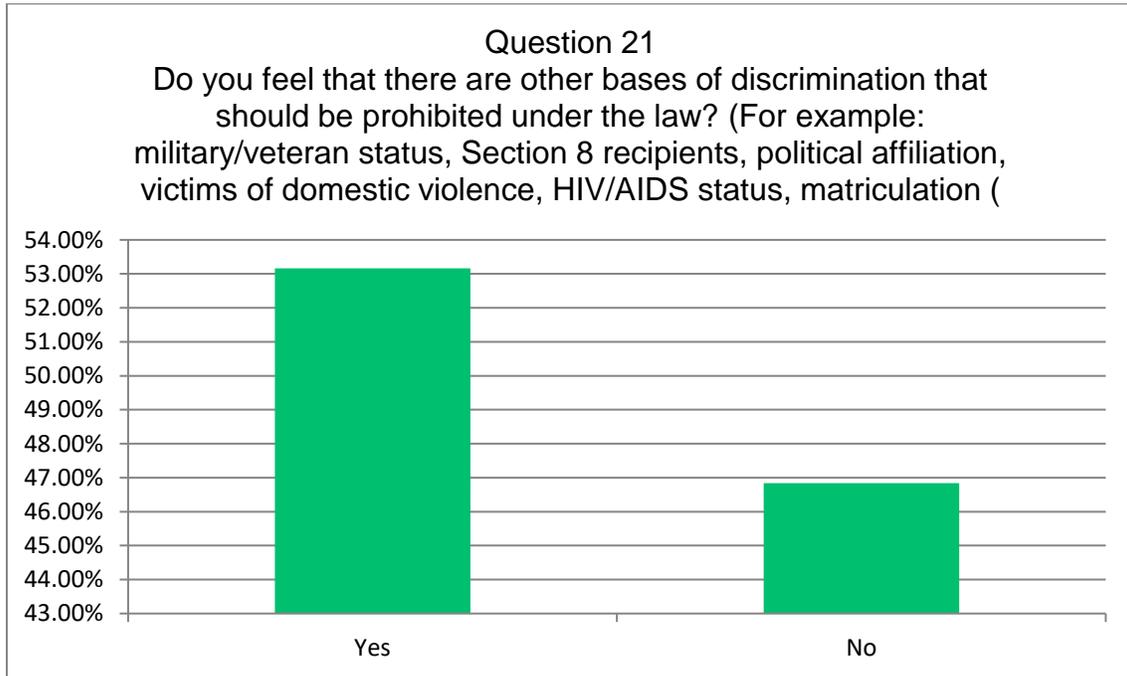
- Stop counting them and actually house them.
- Start providing it.
- Turning condemned hotels /building into shelters for the homeless and using them to assist the homeless into jobs and rehabilitation from drugs and alcohol.

- Provide more low-income housing and more transitional housing shelters. Rent control would be helpful along with providing more financial assistance for families that are facing eviction. Landlords are quick to kick people out and instead they should be trying to help individuals maintain their housing because being quick to evict only adds to the vicious cycle of homelessness. The wages keep going up, but as soon as the wages go up, everything gets more expensive. People need a break from all the increasing prices. Rent control would help in that area.
- Try to have more available housing and apartments, there's not enough
- There needs to be more programs to help them.
- Immigrant populations are getting their housing and food needs met in the County while California (U.S.) residents get "NO" assistance at all. I applied for food assistance and was turned down. How is this acceptable and allowed when I make less than \$19,000.00 annually?
- Develop social service programs which assist with chronic homelessness and the various reasons for it's existence, which work directly with developers and owners who are willing to work with the programs and services.
- Not allowing tents and assisting in rehab and then providing off the grid housing like box car and tiny house or multi-housing units.
- I am currently homeless and there are not enough homeless resources of any kind in Riverside County and the ones that exist operate from a shady standpoint. Legit assistance for the homeless population is what's needed.
- Build more home for people in serious need of a place to call home.
- Take this matter seriously. bit phase don't paint the wall with the smallest brush get the biggest roll so you can reach more people in need.
- We need more low-income homes I've been homeless with my baby for a year already, the population of homeless families here are so large, I can't get the help I need to get on my feet! It's extremely exhausting. Being a single mom with a 1 year, homeless is hard, the welfare system doesn't give enough to get a place. The rent here is too high!
- Build project housing, for families, 55+, vets, mentally ill, single men, etc. and place everyone in their respective groups.
- Can some of the empty buildings, schools, properties in different areas be set up to accommodate temporary housing, March ARB perhaps? I would be willing to work there. I have several years of affordable housing experience.
- I talk to plenty of homeless people. They are so transparent. Majority don't want to be in a shelter because of the rules. There's a mental health crisis in their community. We want to help people who either don't want the help or the help needs to be redirected to another need.
- Programs that truly assist and require regular contact and updates to ensure the participant is moving toward self-sufficiency.
- Investments should be made in getting them off the street and help, but not to just house them.
- Accountability; providing programs that would secure their recovery and re-entry to the workforce and also ensuring these programs are mandatory in order for them to

become eligible for housing and other social services. Providing them with tools and skills that can support growth.

- Providing a revolving door shelter--- that requires them to actively go out and look for work in order to stay.
- Incentive programs.
- This is a very complex issue due to the fact that each case is so unique. The reason why a person is homeless ranges from some kind of misfortune had happen to drug addiction , alcohol abuse and mental problems. Each case will need to be looked at on an individual and case by case and worked out from there. In this case there is no one simple or “catch all” solution that I can see in dealing with the homeless. You can have the person...no matter what you may offer...will just op to live on the streets. In that case, I would offer them some kind of program where they can be say "look outs" for wild animals that may be invading....a farmer's property. Let them actually..."live off the land".
- First time homebuyer’s assistance program, a new one that the county should create.
- This is a hard question to answer. Most homeless are also suffering from mental disabilities that need to be addressed. Some don't want help, and those that do sometimes can’t get it.
- There are plenty of building and homes that sit vacant. Make them shelters have a resident advisor or two at the location.
- The private landlords and property managers cannot keep getting away with substandard living units and taking participants money. The application process is also becoming expensive and credit checks do not cost the landlord \$50 per adult. The homeless population needs housing temporary housing that lasts 3-6 months or one year until they can find a job and locate another place to live on their own. Shelter should be clean and dependable. More affordable housing is necessary for low income people because all the jobs have been transferred overseas.
- I think the ones with children and homeless should be first to get place in homes before disability and veterans. Me I really don't like or trust any shelters.
- Leniency
- Just more consideration for the less fortunate mainly family that has children. For the children that have been taken due to no housing.
- Temporary shelters operated as individual studio apartments with a requirement to attend county job training, and sobriety. The two requirements will contribute to self-sufficiency, empowerment, and Quality of life.
- Services in obtaining employment along with housing.
- Case workers to keep people up to date with their support systems (health insurance, income, food, social...)
- Housing First
- Participants who have been assisted with being homeless, also need a social worker; to help them become long-term housed.
- More funding to build affordable housing.
- Inclusionary housing and increasing the Permanent Supportive Housing stock.

- Local government needs to be on board and support projects in each of their districts. As soon as a few people speak against a project it stops in it's tracks. We all have an obligation to deal with this problem at hand.
- More transitional housing developments
- Providing services only on a temporary basis, encourage working and give benefits
- Increase PSH



**Question 22**  
If “yes” to Question 21, which categories?

Open-ended responses:

- I think all examples mentioned are categories that people discriminate against. Particularly Section 8 recipients. It is hard to find anyone that takes the vouchers.
- Veteran status
- Section 8
- Section 8 recipients from my personal experience, but all which are an issue for self-sustainability.
- Victims domestic violence
- Section 8 or Project-Based. Some employees make comments like “well at least you are getting help” and because of that we should not complain.
- All categories

- Student status, kids, income, etc.
- I have a disabled daughter. It is very hard to find a comfortable, affordable, single story home with carpet. I can't have her crawling around on hardwood or tile. Almost no homes provide this anymore.
- Being poor should be a protected class
- All of the above
- Military status
- Military/Veterans
- Homeless students, pregnant homeless women. parents with children that are homeless.
- Birth origins
- Sect 8 has a horrible stigma, I feel all rental agencies should be obligated to work with sect 8 recipients and the rental amount limit should be flexible according to rental medians.
- Aged out foster kids. I was raised in a foster home and we are not given the tools when we turn 18 that are imperative and conducive to a productive life. We basically have no chance. This needs to change. I actually went into job corps thankfully otherwise I would not have survived this long.
- All the categories mentioned. I am a graduate student and some landlords think I'm talking about kindergarten. I'm working on a doctoral degree because I cannot find work as an adjunct and that is what I am trained to do. Being in graduate school is work and eventually I will obtain employment and become self-sufficient. However, the federal budget cuts have decimated the teaching profession and that has caused me to get a higher degree to be more competitive to obtain work.
- Domestic Violence
- Every Category listed.
- All of the above.
- Student and illness
- Age, gender, income level, mental health, disability, race, religion.
- Section 8 and HIV.
- Section 8 Voucher holders, there is a lot of discrimination goes with Section 8 voucher holders. Landlords just refuse to rent to Section 8 holders.

Question 23

How well or poorly is the prison reentry population re-integrating into our communities and what steps could be taken to improve their ability to reenter and better facilitate their acquisition of safe, affordable housing?

Open-ended responses:

- Not well people hate me cause of the crime I committed.

- Better rehabilitation, education, psychological care, skills development, re-adaptation to society and life skills even before they leave prison!
- Why are U.S. citizen families (with two people disabled) last on the affordable housing and food assistance list? Immigrant populations and prison reentry populations receive assistance before people like myself with no criminal background...how is this fair?
- Everything that is possible without exposing the community to habitual, predatory criminals. People who simply made a mistake and have paid their debt to society should be able to reenter society and commit to their own self development in a similar way to other low income or poverty-stricken individuals and families.
- There is little to no assistance with prison reentry readily available to the actual ex-prisoner. They are barred automatically for felonies.
- Very poor at re-integrating ex-cons back into society.
- Give them job placement, and transitional housing to help integrate them back into society.
- Wow.. Poorly is an understatement. You could start with when someone pays their debt to society for a crime they committed. Incarceration is debt paid. Their record in its entirety should be deleted completely.
- Poorly. Unsure what can help, would need to have more information on the current programs and what services they provide.
- Not familiar.
- Poor. It is hard to get good employment with a clean record, I can't imagine how much more difficult it is for them to get a job.
- Here again is an issue that a "one stop" shop doesn't work. Programs would need to be designed to fit that particular individual. A person needs to feel good about themselves and have a sense of well worth and being and that what they do is valued. Having confidence in themselves. Look into the "why's" they committed the crimes and go from there. Look at and show them what changes and choices they could have made to do something worthwhile. The almighty dollar doesn't always bring happiness. Yes, it may get all the material things but does it really bring you "true" happiness? A question that should be asked.
- They should get help.
- I'm not sure about this. I don't know what to say...I am sure it isn't easy for them to re-enter society hopefully they have a family member or friend to help get on their feet.
- Obviously, if the person has done their time, a second chance should be given depending on the charges. If the person is honest and says this happened and served their time, the person should have a second chance to reintegrate in society with a job and housing. Everyone needs a job and housing to be a productive member of society. The background check system is designed to keep a person perpetually punished.
- The re-integration process for the prison population can makes some changes to ensure less biases when individuals are looking for housing or jobs. They will never be able to afford housing or qualify for housing if the "felon" question remains on housing applications.

- There needs to be some sort of work programs in the prison or jail system that can help those non-violent offenders try and get a leg up so they can re-integrate into society and decrease the number of repeat offenders.
- I do not know enough about this population to form a meaningful opinion for solutions.
- Allow people at entry into housing programs to have an exception for criminal activity. Once they are housed then if they recidivize then terminate their assistance.
- More adamant screening policies and perhaps resources to help former inmates with redevelopment to be able to get their lives back on track.
- Encourage schooling and centers strict on rules of keeping everyone in line.
- Increase housing and workforce opportunities.

Question 24

How well or poorly is the homeless reentry population re-integrating into our communities and what steps could be taken to improve their ability to reenter and better facilitate their acquisition of safe, affordable housing?

Open-ended responses:

- I think the homeless reentry population needs to be offered long term case management. Someone who literally comes by and checks on them where they live and helps facilitate referrals to jobs and counseling resources. Also, someone that can hold them accountable staying focused on their goals and taking care of their living environment. Also financial responsibility classes would be helpful. Classes that help people learn to budget and pay bills.
- Having shelters that implement a 12-step approach.
- Less restrictions on funding.
- Poor and homeless families receive "NO" assistance at all because there is not enough affordable housing to go around. I am a single mother with a masters degree but cannot work outside the home because I am my son's (Autism w/intellectual disabilities) caregiver. There are "NO" after school programs for my son that would allow me to work outside of the home.
- Same as above only for homeless.
- Poorly handled and programs for homeless are operating off of old methods. Psychological aspects need to be taken into consideration when reentering homeless into population.
- More low-income homes, for domestic violence people, everyone deserves to have a home it's unfair to the children to be homeless for mistakes the parents made.
- Very poorly. Unsure what can help, would need to have more information on the current programs and what services they provide.
- Poorly, employers expect explanations for gaps in employment. How is a homeless person supposed to explain the gaps without feeling embarrassed or judged?
- Programs

- Homeless people are grossly ignored, and people tend to complain about where they are setting up camp. Do like that one city and pay the homeless to clean up the city.
- Poor. Have designated affordable housing to assist people who have lost their homes to foreclosure. Don't put mentally ill people on the street because their mentally ill; they need their own affordable housing because that population has special needs. Newly homeless people normally have bad credit because of foreclosure or eviction and cannot find another place to live and wind up on the street. Credit counseling is definitely needed because without decent credit, the family cannot obtain housing.
- It's very poor needs more genuine individuals who can look past their selfishness and actually see the hardship others are facing in life.
- Hold them accountable for their actions. Those that don't want to live by the rules should be stripped of any public assistance and run out of town.
- Surrounding this population with supportive services and assisting along the way will go a very long way in helping them succeed with affordable housing.
- The Housing Authority of Riverside County is doing an excellent job at housing the homeless population. However, we need more Permanent Supportive Housing units.
- It is very difficult. Landlords don't want to rent to people with criminal backgrounds or back credit. It is nearly impossible to find a homeless person that doesn't have a criminal history for minor offenses or one with good credit history.
- The homeless population is a very serious problem in our County and in the City of Hemet.
- We need to increase supportive services and affordable housing and expand drug treatment options.

Question 25

What particular challenges do you see facing the LGBTQIA+ (Lesbian, Gay, Bi-Sexual, Transgender, Queer, Intersex, Asexual+) community obtaining the housing of their choice? What can or should be done to mitigate or eliminate those challenges?

Open-ended responses:

- Sexual preference should never be used to consider housing applications.
- I am sure that the LGBTQIA communities face their share of challenges.
- People discriminate against them based on their appearance.
- I'm sure they too have to suffer from discrimination. Really what it comes down to is money. A gay person with money will not suffer discrimination as a gay person with no money. Which applies to all the protected classes. How to fix it? Hit the person/business that is discriminating with such a severe monetary fine it would render them poor overnight. Discrimination would essentially stop.
- The landlords ask, "Do you have a boyfriend?" They assume and put someone on the spot. It's none of their business but your forced to answer to secure a place.

- Possibly the application process. Do rental / housing applications require applicants to describe their sex? Are these applications regulated? Do they offer options such as selection transgender, non-binary, etc.?
- This is a hard one, because of the fact that you would have to change the mindset of the general population. It's going to take time and lots of it. It may take years, decades, or even centuries and then again it may never change. It's what us black people have been dealing with the past, present and most likely future. Things have and will get better over the years...but "true" acceptance...that's a WHOLE different ballgame. To me the only solution I can see it education. Educating the populous is the real key.
- They are sexually harassed by pervert landlords like I have been for being a single mother. Landlords are notorious for sexually harassing Section 8 participants. I'm looking for a place to live, not to sleep with you.
- Income, jobs, transportation.
- Awareness, mentorship programs.
- I have not run into this discrimination at all in the City of Riverside, Moreno Valley, Jurupa Valley or Corona where I do most of my business and dealings with housing.
- LGBTQIA+ discrimination is more prevalent than ever. If they are added to federally protected class, then it will help eliminate the issue tremendously.

Question 26

What housing-related issues do you see affecting victims of domestic violence and their families? How can we better ensure that this population has access to safe, affordable, and stable housing options?

Open-ended responses:

- I think people fear renting to victims of domestic violence because they are afraid their abuser will find them and create problems for everyone.
- Create more safe houses.
- More women’s shelters that can accommodate women with more than two kids.
- Again, no restrictions on funding.
- Victims of domestic violence are suffering from the past violence, they could offer more help to these victims.
- I am a victim of domestic violence and that is why I am a single mother today. My choices, hum...either I stay in the relationship and die the way my mother did when she was murdered (domestic violence) or become a single parent and have no housing/food assistance from the state I have lived in since 1976. Not much of a choice.
- Hard to relocate with no job/ lack of income.
- I came from a DV shelter. Unfortunately, they don't tell you about housing. I had to be proactive and call Riverside Housing Authority myself. They weren't too helpful either.
- Financial barriers. Providing assistance to domestic violence victims with rental assistance.

- More "safe housing" needs to be established and of course financial assistance. The laws need to be strengthened to protect those who are victims.
- I believe that they are domestic abuse victims and don't feel safe, wherever they might go, there will be some sort of fear. It is very sad when you feel like that, I myself have been a victim of domestic violence, verbal violence, and mental violence. they should be able to be place in a housing unit somewhere in another city, not the same one where the aggressor stays.
- I was a victim of this and reached out for help...the programs in place are a farce. It's a facade.
- Women need a way of reporting domestic violence as well as LGBTQIA+ because we are marginalized by white, male, property owners who think the participant is their property too. There needs to be a safe way to report sexual harassment by landlords because it is a power issue.
- Better restraining orders or protection. Too many women are at risk due to lack of protection.
- Domestic violence families may encounter lower housing options due to lack of credit and/or income/employment/childcare.
- We need to increase supportive services for victims of domestic violence.
- They need to be protected. My sister is currently going through this and it's hard for a single mom to find housing with no help.

Question 27

Do you believe that the County of Riverside has adequate public transportation to allow residents to access housing, schools, shopping, healthcare, jobs, etc.? What can or should be done to improve public transportation in the County?

Open-ended responses:

- No and the bus stops have no covering or seats.
- Yes
- Absolutely not
- Need better access to bus passes.
- At no cost or low cost.
- Offer additional transportation options. An elderly person is not always able to use a bus.
- Make transportation means known. RVC doesn't make public help known or only poorly known even when help is available.
- Some of the lines should run more often and not run more than 5 or 10 minutes behind schedule.
- No. The buses end too early in the night, they go in all different types of direction and bus drivers refuse to accept riders after being a second late.

- The bus needs to run every 10 minutes during the day, 30 in the middle of night, 24 hrs. a day.
- No, the public transportation is not adequate, unsure what can be done to improve.
- It is moderate, not 100% reliable.
- No, I do not believe that Riverside public transportation is adequate. Being an RTA customer, I know from first hand in some areas it works fine but then in other areas it falls flat. I'm a senior so I can only speak on the service that is offered to us. I would like to see the service start earlier and end a bit later. But on the whole....as a native New Yorker with the best transportation in the country I strongly suggest that you take a look at what they are doing in the great City of New York and copy it.
- They say they have transportation available now but only for healthcare purposes, for housing, shopping, and jobs, I have not seen that happen. for school there are busses.
- I honestly don't know. I thankfully have been blessed to never have been without a car.
- The bus runs four times a day.
- Public transportation is way better than it was 15 years ago. Service is pretty dependable.
- Not in the Coachella Valley. The bus system in place now does not have stops in many areas of our valley.
- Not sure.
- No, we have a horrible public transportation system in the Inland Empire. All trains go to OC and LA, no Inland Empire line that allows you to stay within the County. Metrolink only tailors to those that work in LA or OC, not to those that work in Riverside County.
- We definitely need more public transportation in SW Riverside County.
- You should have left the trolley tracks going down the middle of Magnolia Avenue. That would have been the ideal way to get people from one end of town to the other.
- While there is a robust bus system, it sometimes does not run often enough to get people to their jobs on time. Frequency may require some study.
- Better access to route information and frequent routes. possibly providing shade at the stops while waiting.
- No, it takes hours to get from one place to another.
- Have public transportation accessible at all affordable housing developments. Have public transportation work more closely with the affordable housing community.
- Provide on-time services.

Question 28

Do you believe that there is access to quality, affordable healthcare in your community? What can or should be done to improve access to healthcare in your neighborhood?

Open-ended responses:

- I believe there is affordable health care in the community.

- Yes
- No
- California has been great at assisting me and my children with healthcare and for that I am very grateful.
- No. There needs to be an overall healthcare reform, places are over-crowded and people do not know how to attend to small health issues at home.
- No. Hire better doctors and appoint people that are concerned about patient health and not numbers/money to oversee the doctors.
- Not affordable.
- Hard for me to speak on this one...since I have Kaiser, I already have the best health care there is. Here again, I would suggest take a look at what Kaiser is doing and copy that.
- Yes there is.
- No. I can't get seen as of right now actually. I did enroll with Covered California and they want \$76 a month. With a fixed income it is impossible.
- No because of the ridiculous deposits and waiting times.
- I have access to quality, affordable healthcare in my community. People in rural areas do not and that's a problem for them because that's where cheaper housing is located.
- No there is not. Some communities of our valley are in desperate need of more free, affordable, medical attention.
- Provide free screenings.

Question 29

Do you believe that there are enough banks in your community to meet the needs of the population? What can or should be done to improve access to banks in your neighborhood?

Open-ended responses:

- Yes. There are plenty of banks.
- Banks are adequate.
- Too many banks but no money to put in the bank.
- No. More ATMs
- Yes, I believe we have enough banks to meet the needs of the population. With a bank on almost every corner I see no problems.
- What kind of banks? nobody has money for the bank accounts.
- They just closed a Chase bank here. There is one teller most times lines tend to be long.
- No issue with access to banking.

## Question 30

Do you believe that there is sufficient access to credit through affordable means to the people in your community? What can or should be done to improve access to affordable credit in your neighborhood?

Open-ended responses:

- I don't believe there is sufficient access to affordable credit for people. Low income people can have lower credit scores because they struggle to make payment to their bills on time. Then, once they are late with a payment they are burdened with higher minimum payment, fees and higher interest rates.
- Yes
- No
- There are no options for credit at the moment other than very expensive payday loans and high-priced options for people with little to no credit.
- No. Because poor people are my community and banks/companies do not extend credit to poor people and communities.
- No, everyone's credit is shot, credit should not even be a factor in renting to low income families.
- No and I do not have enough information to comment on improvement.
- Not sure
- Now here is the "real" good question. No! there's no sufficient access to credit through affordable means. Some banks do try to help you out and other not. The ones that try to help are really no help. They just claimed to be helping you out, but in reality its a trick to lure you in to get you in debt. If banks want to help...lower your interest rates!
- No how do I rebuild my credit?
- I think credit should never be used. If you plan on using credit take a class first on finances. They should integrate that in schools as well.
- Mentorship, classes, special programs
- Federal regulations govern most of the credit markets and services so not sure there is much anyone can do on a local level.
- Education and assistance on credit management to better educate community on how to make credit work in their favor.
- No. Most credit available to low income people is these crooks that operate credit shops at high interest to people with bad credit.
- Provide information to the public, social media.

## Question 31

Do you believe that there are enough living wage jobs available across all skillsets and education levels in your community? What can or should be done to improve access to good paying, stable jobs in your neighborhood?

Open-ended responses:

- I do not believe there is access to jobs that have living wages in the neighborhood.
- No, there's not enough jobs out there.
- Yes
- No
- No, I have filled out numerous applications/resumes and still have no job. The jobs in the education field are not interested in employing African American women like myself.
- Companies are asking for extensive education and paying very low wages. Companies are now asking for multiple skills for one position and then only paying for one type of skill. Unions charge monthly wages that are not affordable. Rate of pay is very low for office, admin and clerical work.
- No. There is a lot of discrimination in the Inland Empire towards black people on jobs and blacks do not get the job desired, matching with their skills. There is also way too much bilingualism in the I.E., that leads to blackballing and keeping non-bilingual people from working permanently. (e.g. temp agencies)
- No there is not. I have an Associates degree in human services and behavioral and social studies and there are no jobs accepting Associates degree.
- Employers seek to get the person who is the most qualified, but is willing to take less pay.
- I'm retired and have lost track of what is going on in the job market here in Riverside. So I can't speak on something I don't know anything about.
- No, I still have not been hired in one year.
- No. Within the surrounding communities of Eastvale, Jurupa Valley, and Norco, there are a lot of low-income fast food industry jobs, with the exception of the new and upcoming development in Ontario Ranch.
- No. We need more training available.
- No educational opportunities need to be more affordable and efficient.
- While we are making progress on attracting higher wage jobs to the area, there is still a shortage of skilled workers for those higher wage jobs. We need to continue to focus hard on education and college degrees to ensure that there are skilled workers in order to attract better paying industries.
- No. We need more high paying jobs in the area.

## Question 32

What can or should be done by the County of Riverside to improve the quality and safety of schools in your neighborhood and in the County?

Open-ended responses:

- Hire more teachers. My daughter’s classroom has 44 students and one teacher...this does not make sense. I feel that the school my children attend have an adequate amount of security.
- Easy, give the schools more money and there shouldn't be any exception of where a child is from or what their race is.
- Cameras in the classroom so parents can check up on their kids, police officer liaisons office on all campuses.
- Keep on track with times we live in technologically. Swiftly address issues of bullying, both on and off campus.
- Parent involvement in school.
- Educating children/ students and parents when it comes to active shooters, looking for signs of depression, and overall mental health issues.
- With all the shootings that have been going on lately, this is a very important issue. I really don't know what can be done in this case. There are too many unknowns to deal with. I guess what the County of Riverside has put in place for now is all that we have to work with. As time goes on hopefully things will get better and we once again return to a time that shootings will be a thing of the past.
- Nothing, we are a new world order and the parents don't know how to teach children anything , that's why you see so much violence in school now a days.
- Keep them secure with security guards to be able to protect our kids.
- More security.
- I think the main problem in school is bullying. Do more extensive background checks on teachers.
- Keep pedophiles away from all P-12 schools.
- Hiring more deputies so they can monitor every school in the County.
- Metal Detectors at schools...Schools are just unsafe now.
- Minimize the entry points for each of the schools. Arm the teachers that are willing.
- Better wages for teachers and make it more appealing to want to be a teacher by providing grants, opportunities to create more jobs as teachers, aids, etc.
- Have more traffic enforcement during drop off and pick up times.
- Provide more security.

## Question 33

Do you believe that Riverside County's schools are adequately preparing students to compete in the global economy? What can or should be done to better prepare students to compete?

Open-ended responses:

- More classes on skills they will need to live successfully in this world such as credit, how to get a home or auto loan, what is an interest rate, parenting, how to rent an apartment, how to write and follow a budget, how to apply for jobs and how to research schools and colleges.
- Yes
- No they teach to pass standard tests and not how to even function in the real world.
- Provide classes to better prepare students such as financial and real-world skills.
- Absolutely not!
- No, teach them hands on craft skills
- They need to focus on two things. Learning a new language and math.
- Not rewarding them for participation but rather rewarding students that get the highest scores. Students need to learn that competing is healthy and to take criticism in order to grow and not feel entitled. Also supporting our educators and promoting art and creativity.
- No, school does not teach students about life topics, such as: taxes, credit, loans, interest.
- Since my children are grown...one is an 8th grade English teacher and the head of the English department and my other daughter works in the legal department of the Director's Guild. I have lost all contact of what is happening in the schools of Riverside. So, I would like to think and hope that Riverside is doing its best to prepare our children to be able to compete in the global economy of the future.
- I think the student needs to be the one expected to do their duties in this case. It depends on the student's drive. The teachers could actually teach as well. I hear they're just a bump on a log and don't explain anything.
- It depends on the funding the school is receiving. Some school districts have more resources than others so the school districts with more resources have students that are more likely to attend a University.
- As a nation, our students are not adequately prepared to compete in the global economy, unless they were privileged enough to attend private schools. Unfortunately, this issue is one that requires Congressional and Federal actions in order to implement policies and laws preventing educational budget cuts.
- I believe County's schools are not preparing students the same way in every city. Better schools are in the cities where there is more global economy (businesses) and influential people. I believe government should use the same programs in every school no matter of people's color, race, ethnicity... the most important thing is to prepare all of our

children to get ready for the future because we are finding it tough, especially these years and it does not look as if it's going to become easier for them.

- No, not all the public schools in our valley.
- No, our school system is flawed...needs major reform to compete on the global economy.
- I think we continue to make progress on education, but I believe we also need to improve on the "trades" that provide good pay but not a college degree, like construction job training; auto mechanic training, etc.
- No, they should have more classes that teach kids real life skills like being an electrician, plumber, certified forklift driver, etc. Not everyone is cut out for college and we should approach our schools that way when teaching kids.
- Make more classes available, other languages, arts, music.

#### Question 34

Are there any other issues you feel need to be addressed in the Analysis of Impediments to Fair Housing Choice?

Open-ended responses:

- More affordable homes need to be made available to the people that live and work in the valley. Low income people have to work too hard and they still cannot afford the price of rent and bills.
- No.
- I would like to see one central starting place to obtain information housing, assistance for people with disabilities, income challenges, senior services, etc.
- The system and locations need to be looked into and updated/reworked.
- All housing should be available to all. Stop using senior or family housing to restrict use. Stop using bedroom size to a lot housing. A unit that is within the recipient's voucher amount should be available to rent.
- That there should be more means to help for single mothers.
- There are no "Fair Housing Choices" because there is not enough affordable housing to go around and the people that do receive affordable housing never move out.
- Yes, the payment standards should be reviewed and increased based on the reality of the market.
- Rent cost control and not allowing landlords to treat residents like they can be evicted for any reason that is very unfair.
- Yes, why does it take so long to get a place?
- Finding housing should not be difficult, I pay \$1,200 a month to live in a motel, but yet no one will rent to my family, sad.
- Recertification. Should be the same paperwork all the time. I gather all my paperwork and they want something more from last year. Landlords: It should be mandatory for

them to attend a class on do's and don't's. My previous landlord was completely abusive. I had enough and called the police. It seems like the H.A. sides with the Landlords.

- Not sure.
- Yes, the rents in this area has just gotten out of control. What is going on here?! Rent control needs to be established and incentives need to be given to those landlords that work the hardest and really care about their tenants and property. Yes, more affordable housing needs to be built so that the average person can pay a decent rent without having to struggle.
- Rental price in Beaumont for a 3-bedroom is anywhere from \$1,800 to higher. Choice voucher for a 3-bedroom \$1,680, it makes it impossible to find rent at that price on top of many homeowners do not want to rent to Section 8 recipients.
- How we can be self-sufficient.
- Yes, more tutoring that doesn't require having a car.
- Please make more affordable housing so that people on the Housing Choice Voucher Program can find a decent place to live. The program is really good to participants, however, when the housing market is tight, landlords know they can get away with breaking housing laws.
- You covered a good deal of ground in this survey!
- I think young families with young kids should be a focus in helping them get housing.
- The FH impediment right now is the lack of available affordable housing units.
- There should be more communication with all programs for low income customers, the more all staff knows about other programs available for their customers the more help they can be.

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End of Survey

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