

**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**

Households by Race/Ethnicity	Riverside County			(Riverside-San Bernardino-Ontario, CA) Region		
	# 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%
<b>Total</b>	<b>146,135</b>	<b>683,145</b>	<b>21.39%</b>	<b>272,910</b>	<b>1,287,025</b>	<b>21.20%</b>
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

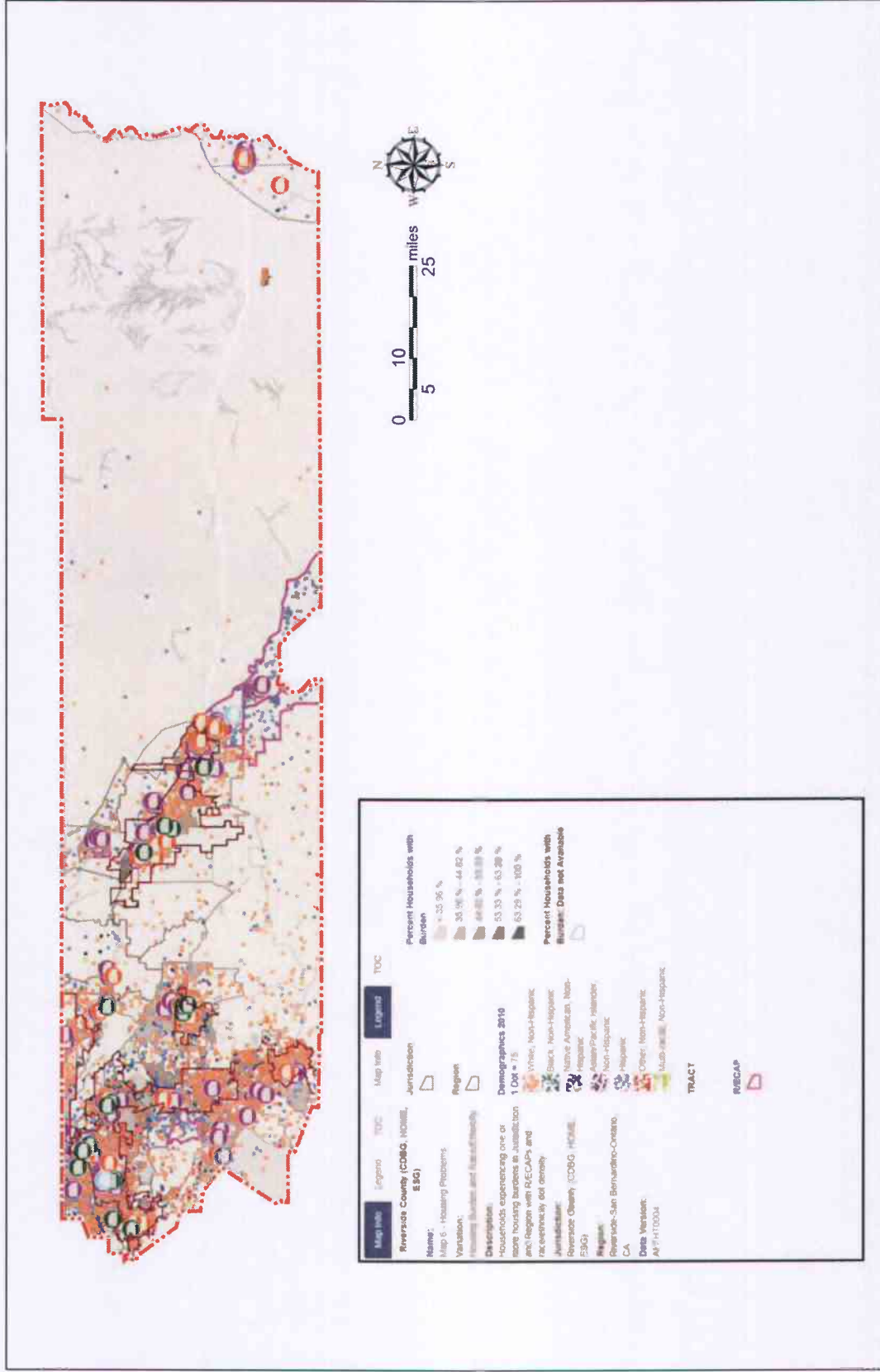
Note 3: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

*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



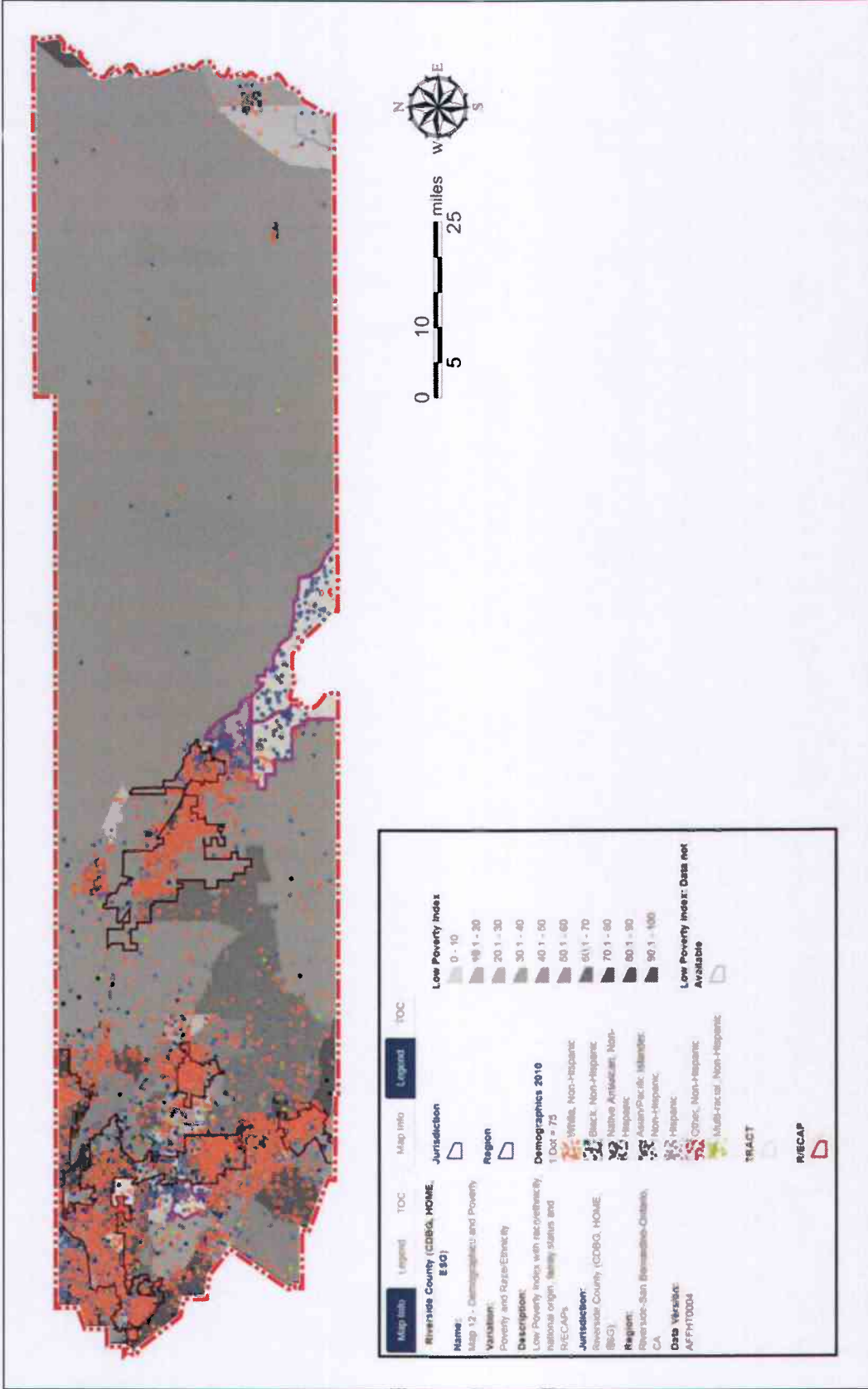
Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, November 2017.

*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>).



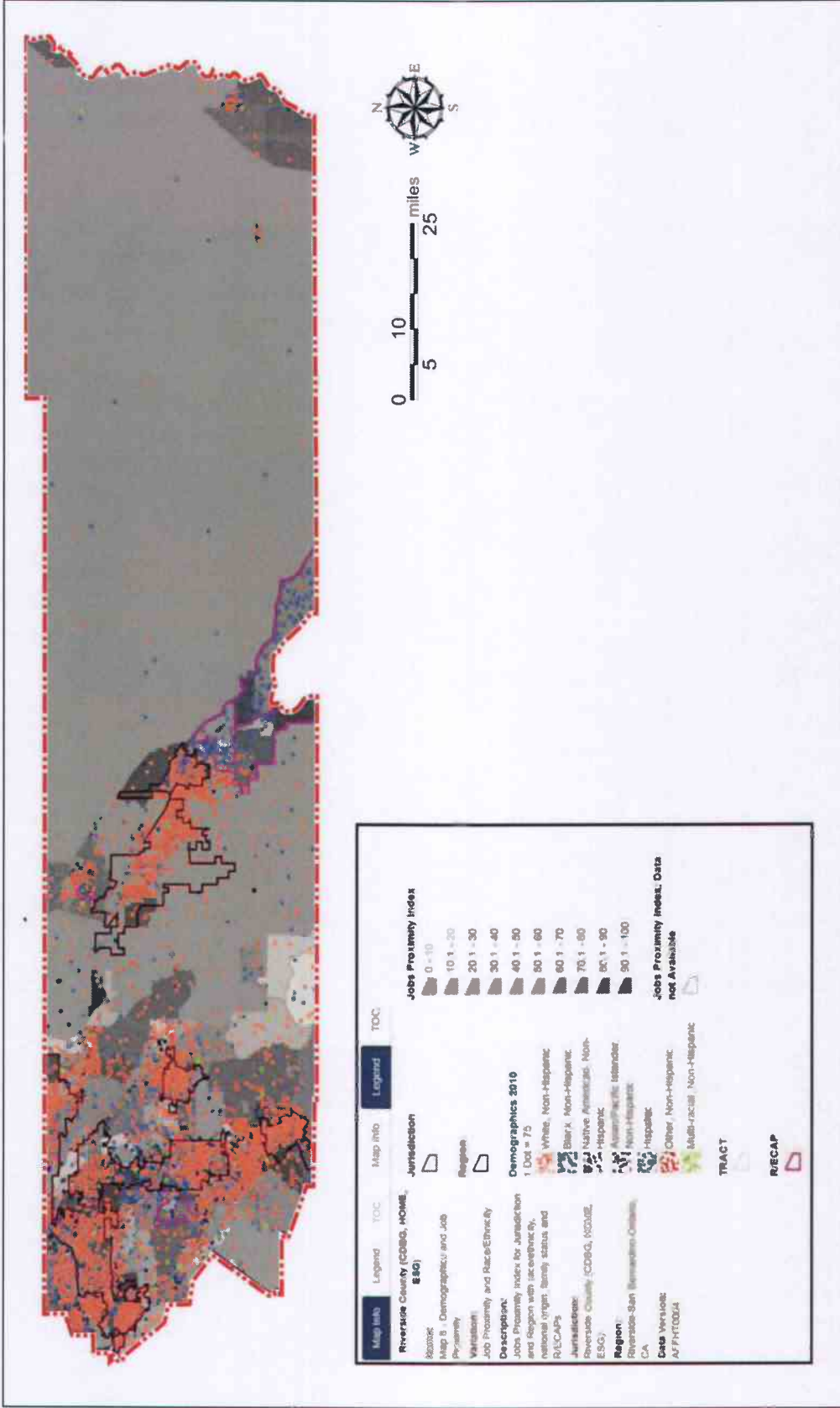
*Jobs Proximity Index*

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%	\$199

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.

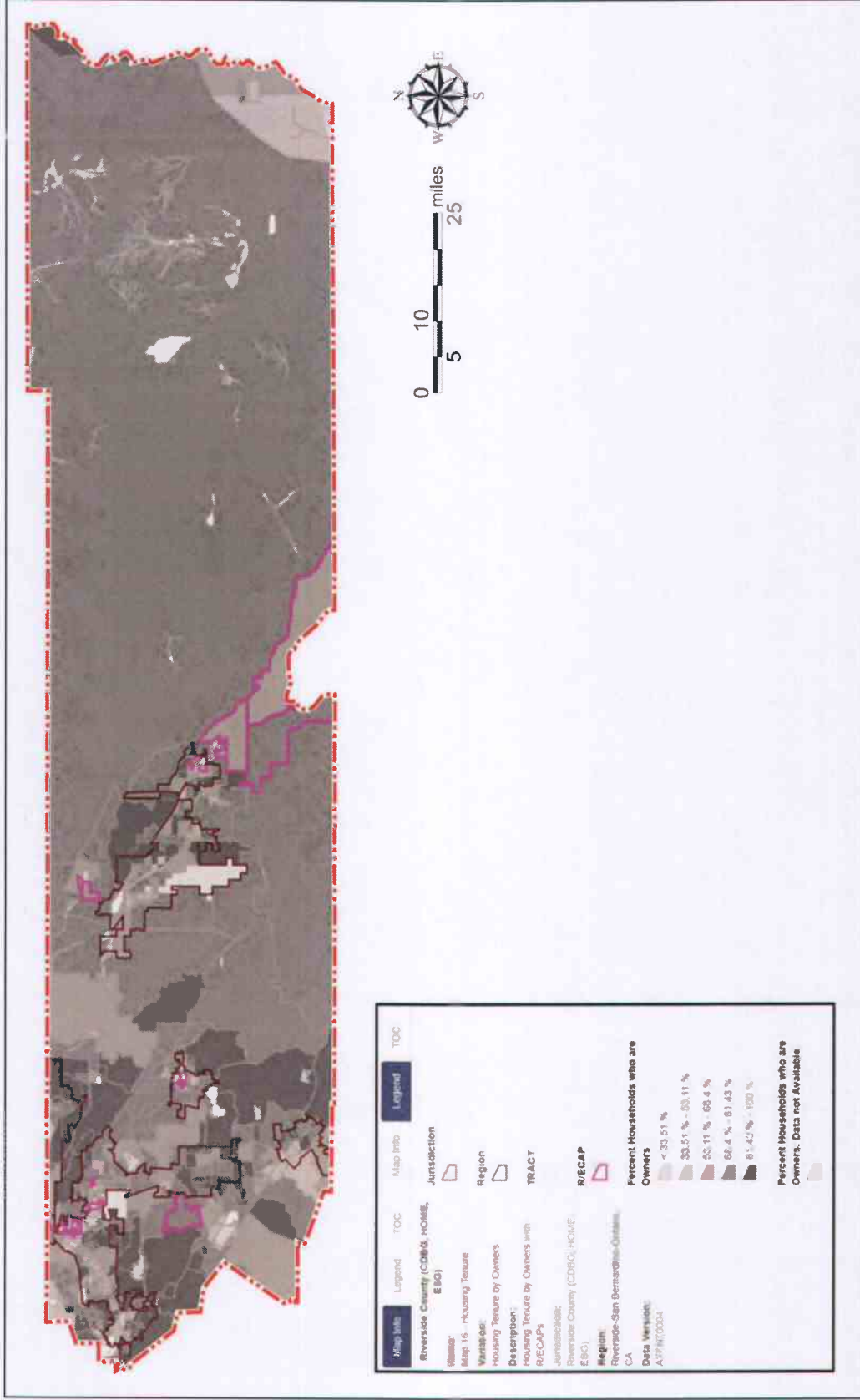
Map II-5: Housing Tenure by Renters



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.

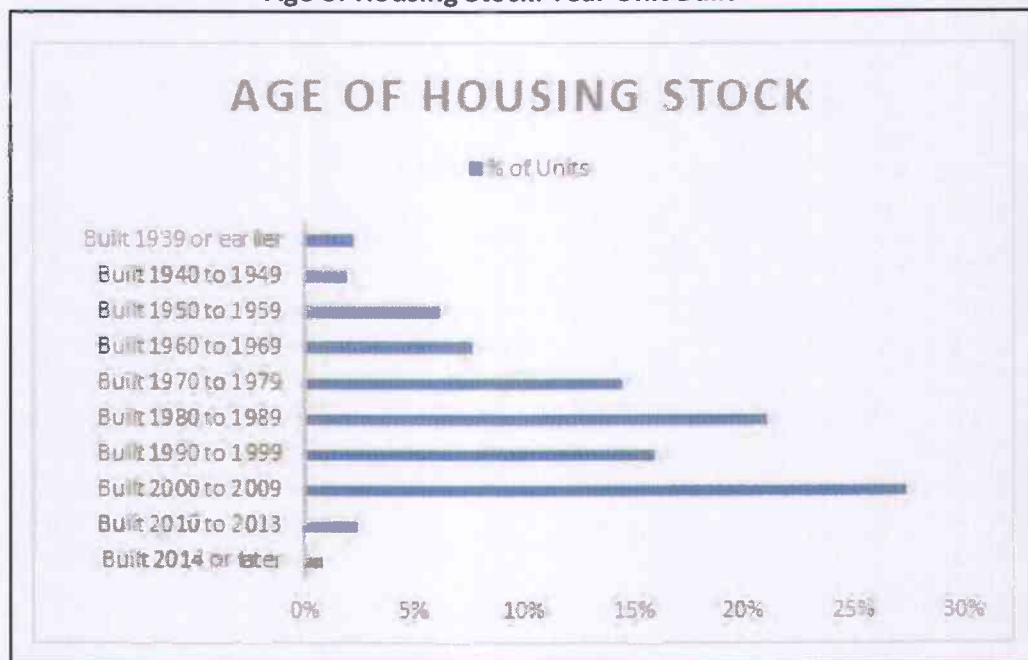
**Table II-20** and **Graph II-1** indicate the number of homes built in Riverside by decade or two-decade period. As of 2017, 32.3 percent of the housing was at least 38 years old. Within the housing industry, as a general rule, homes older than 30 years begin to require major investments to maintain 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>-</b>	<b>248,936</b>	<b>100%</b>	<b>-</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		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Households experiencing any of 4 housing 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

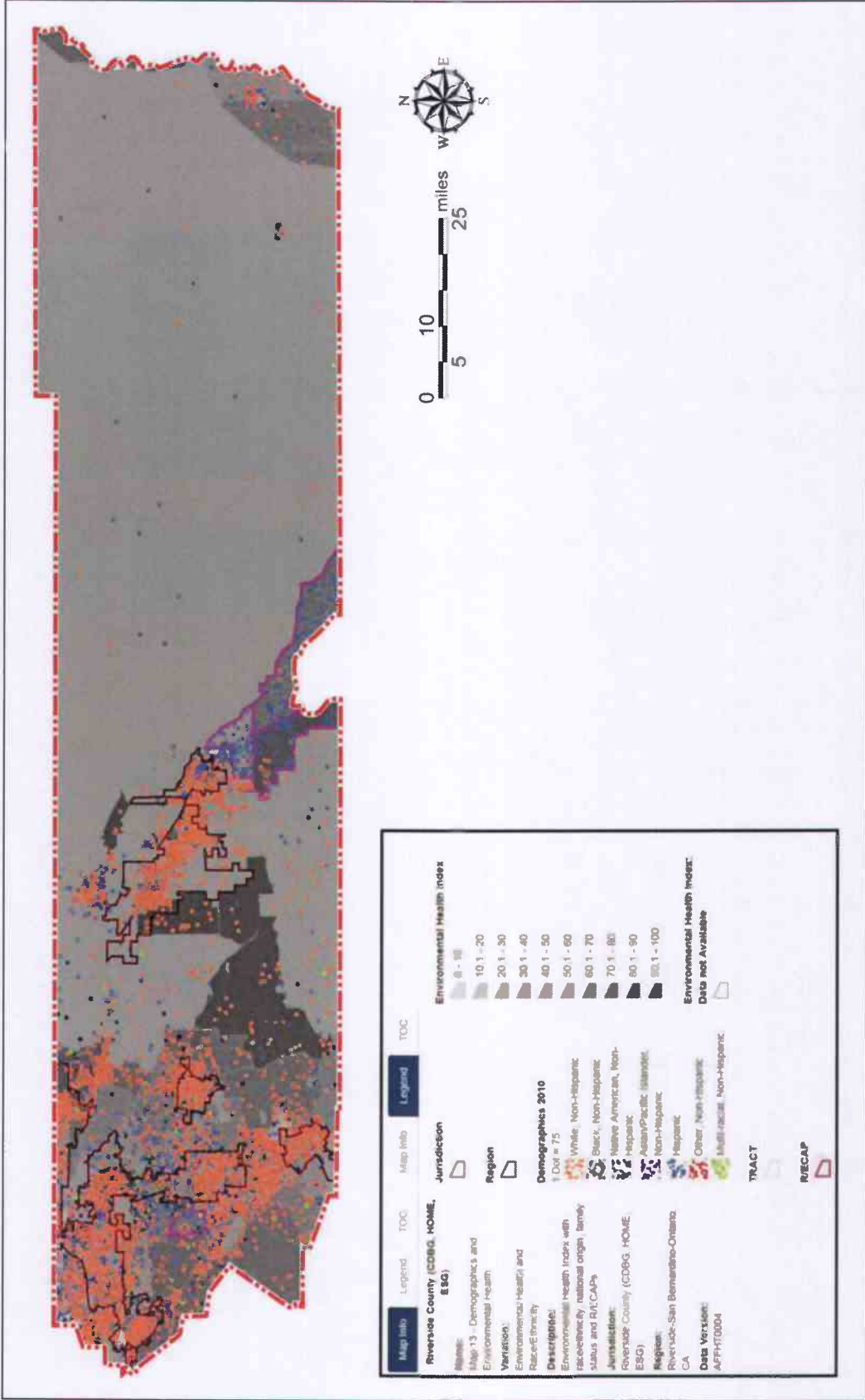
air quality carcinogenic, respiratory and neurological hazards with indexing census tracts. Values are inverted and then percentile ranked nationally. Values range from 0 to 100: the higher the index value, the less exposure to toxins harmful to human health; or, put differently, the higher the value,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

Project Name and Address	Location	Total Units	Affordable Units	Funding Source(s)	Expiration Date of Covenants
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 #7 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	
Housing Type	#	%	#	%	#	%	#	%
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%
(Riverside-San Bernardino-Ontario, CA) Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
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

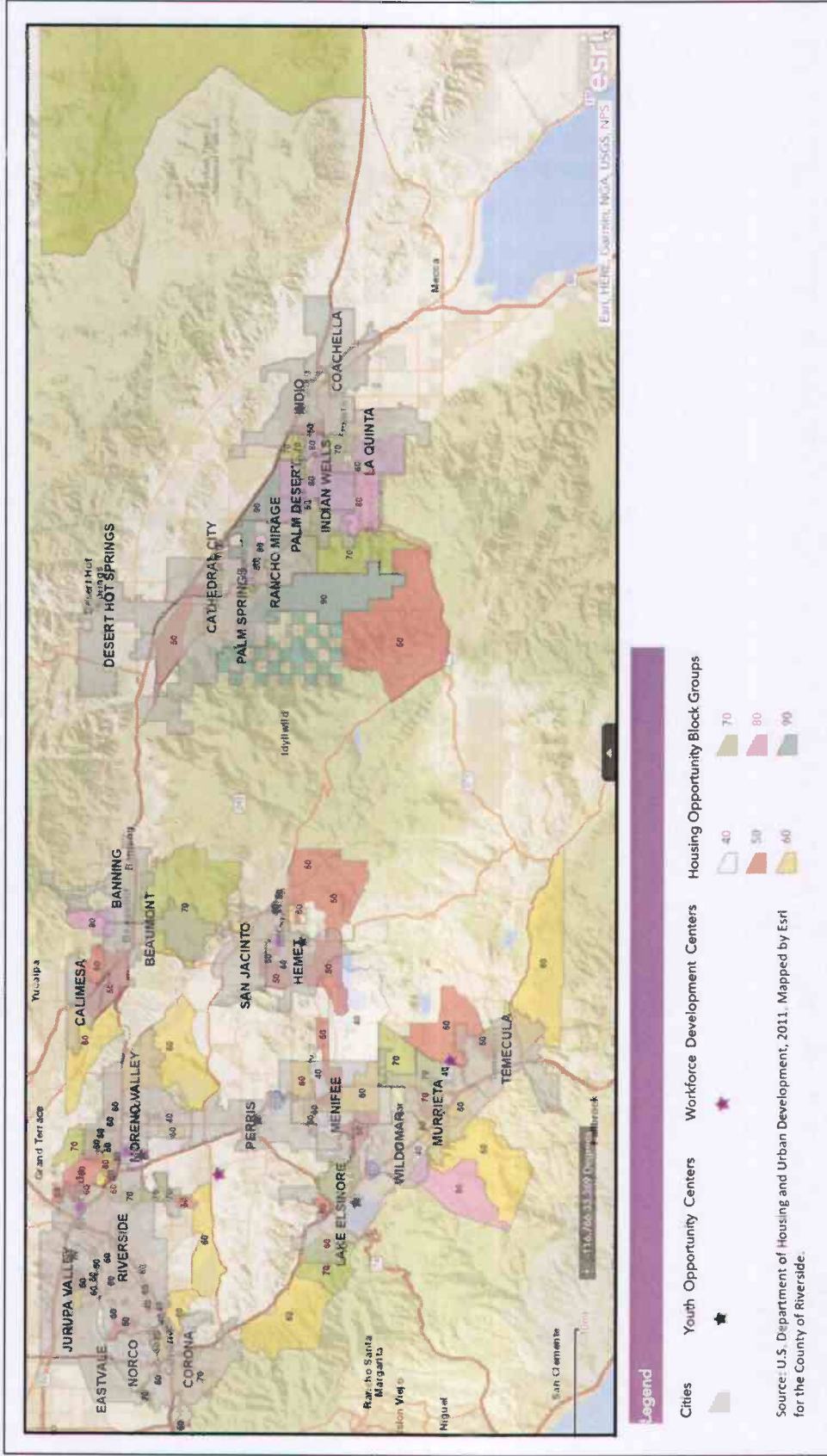
local ordinances, often referred to as source-of-income protections. These make discrimination against voucher holders illegal. In addition, fair housing advocates argue that claims under the Fair Housing Act may be justified, because practices such as electing not to accept vouchers result in “disparate 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 3,843 0-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."

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

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 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*

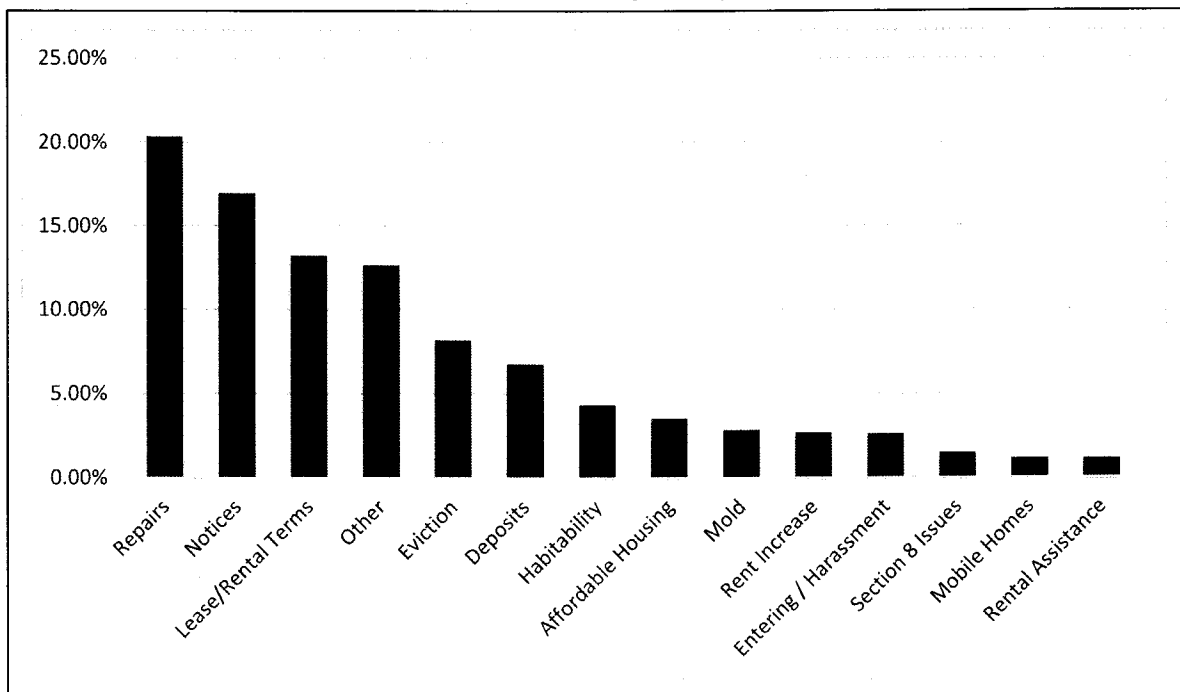
The County of Riverside has contracted with the Fair Housing Council of Riverside County (FHCRC) to provide fair housing and related services. Established in 1986, FHCRC is a private, non-profit and community-based organization which implements the following fair housing programs for communities throughout 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: FHRC 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®, Master Property Manager, MPM®, and Certified Residential Management Company, CRMC®. 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

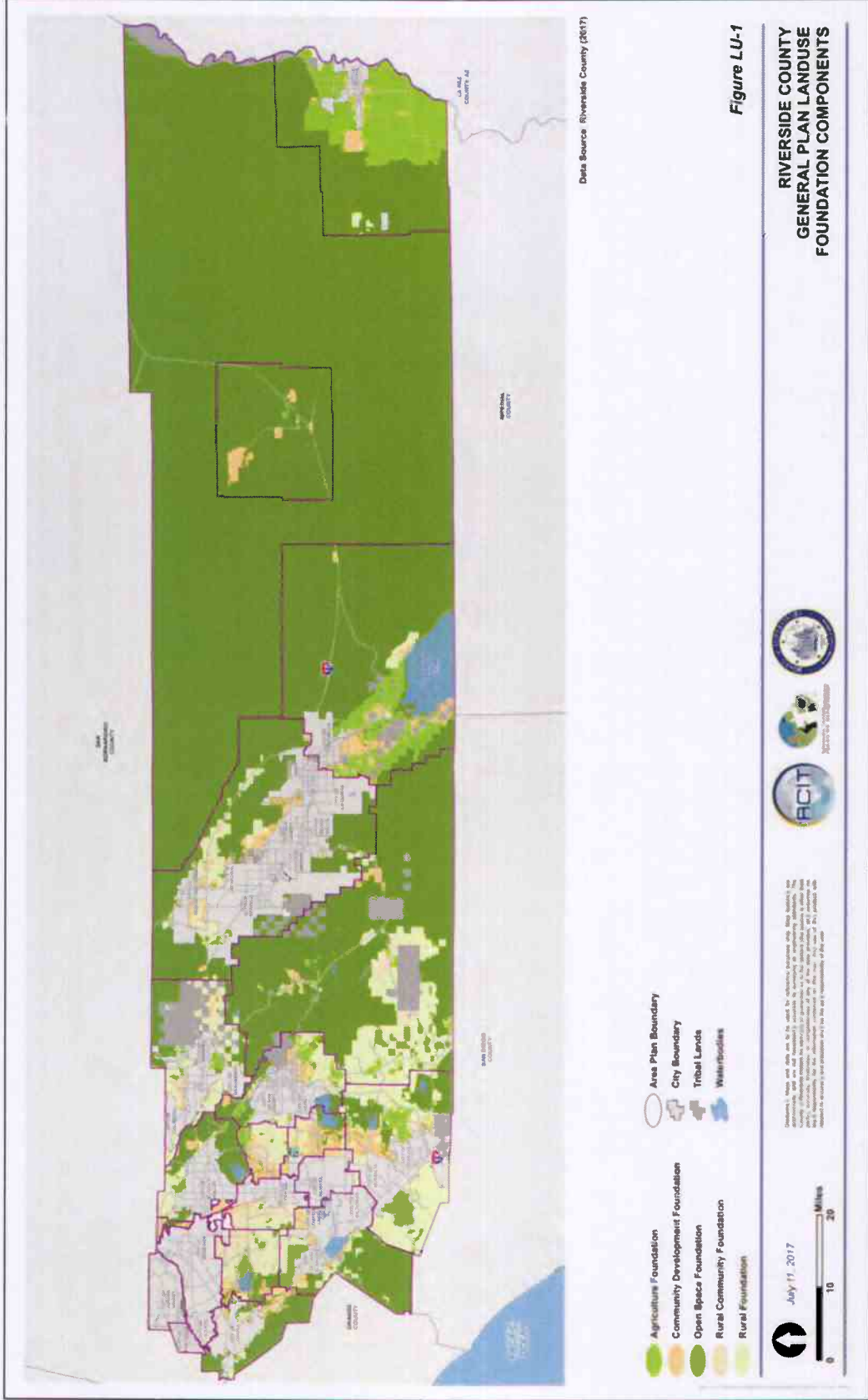
**Table IV-1  
County of Riverside General Plan Land Use Designations Including Housing**

		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.
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.

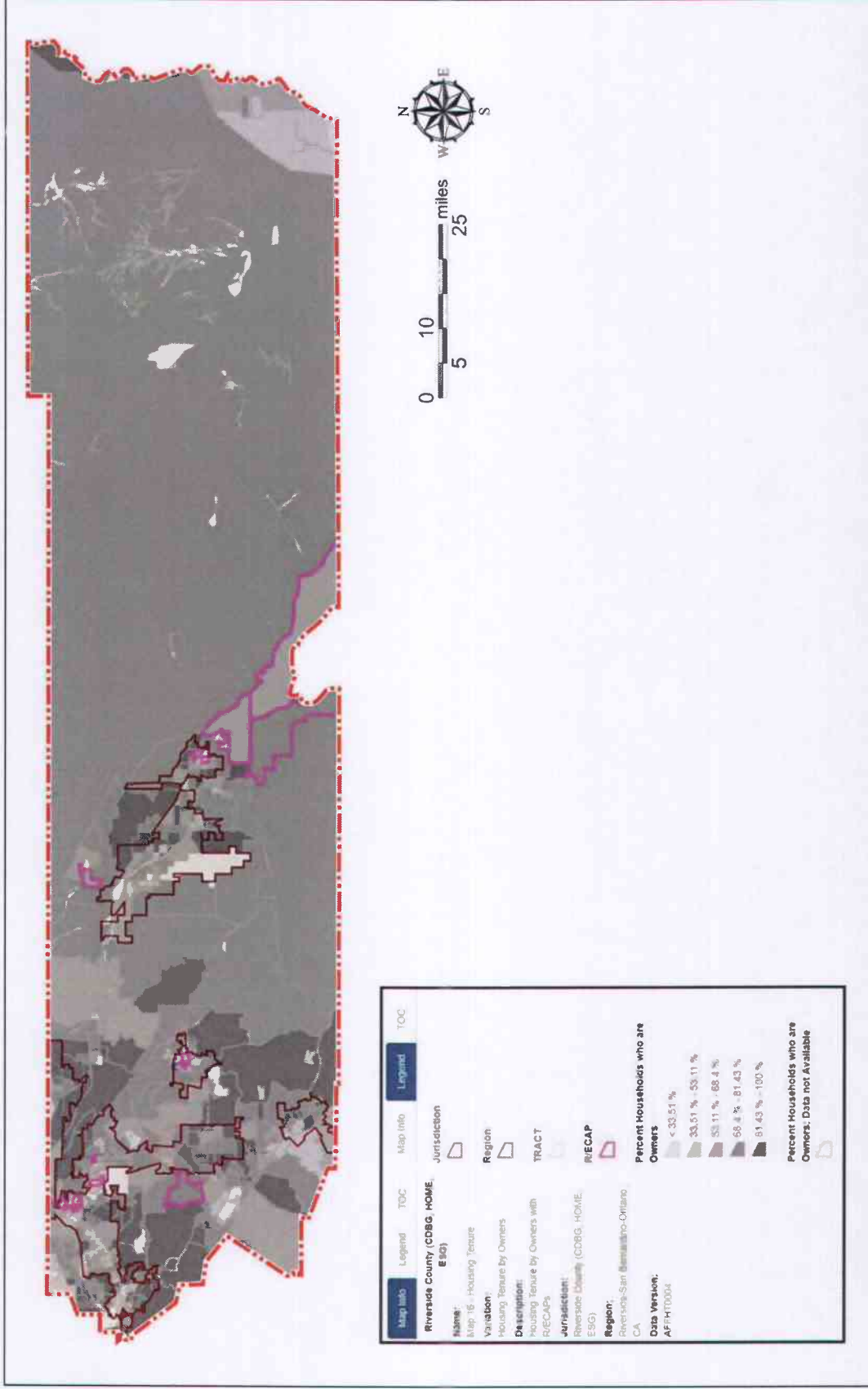
Map IV-1: Riverside County General Plan Land Use Foundation Components



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



Map IV-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-4  
Residential Zoning Requirements

Development Standards	R-1, R-1A	R-2A	R-2	R-3	R-3A	R-4	R-5	R-6	R-7 (ranch)	R-7 (leisure)	RA	R-8	R-8-O	R-7****	R-1-R	RD	A-1, A-2	AP	AP	AP	A-D	A-D	Operations	MU
Minimum Lot Size (sf)	7,200	7,200	7,200	7,200	9,000	3,500	5,000	None	None	None	20,000	0.5 acres	0.5 acres	7,200	40,000	20,000	20,000	5 ac	5 ac	20 ac	20 ac	20 ac	None	
Minimum Lot Width (ft)	60	60	60	60	60	40	30	None	None	None	100	80	80	60	100	100	100	200	200	x	x	x	None	
Depth (ft)	100	100	100	100	100	80	x	n/a	n/a	n/a	150	150	150	100	100	150	150	x	x	x	x	x	None	
Front (ft)	50	20	10	10	10	10	10	n/a	n/a	n/a	20	20	20	20	20	20	20	20	20	20	20	50	15	
Side (ft)	5'	5'	5	5	5**	5***	Varies	n/a	n/a	n/a	5	5	5	5	5	5	5	10	10	10	10	25	0'	
Rear (ft)	10	10	10	10	10	10	10	n/a	n/a	n/a	10	10	10	5	5	5	10	10	10	10	10	25	n/a	
Feet	40	30	50-75	50-75	40-50	40-50	35-50	75/100	40	40	40	40	40	40	40	50-75	40	40	40	40	50-105	40	90-105	75/100
Floors	3	2	n/a	n/a	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	n/a	n/a	11*****

Notes: This table is 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 18.19 for elaborated 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. (b) A minimum of 500 square feet for each residential lot shall be usable recreational area. (c) 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
Total civilian employed population 16 and over	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.

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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.

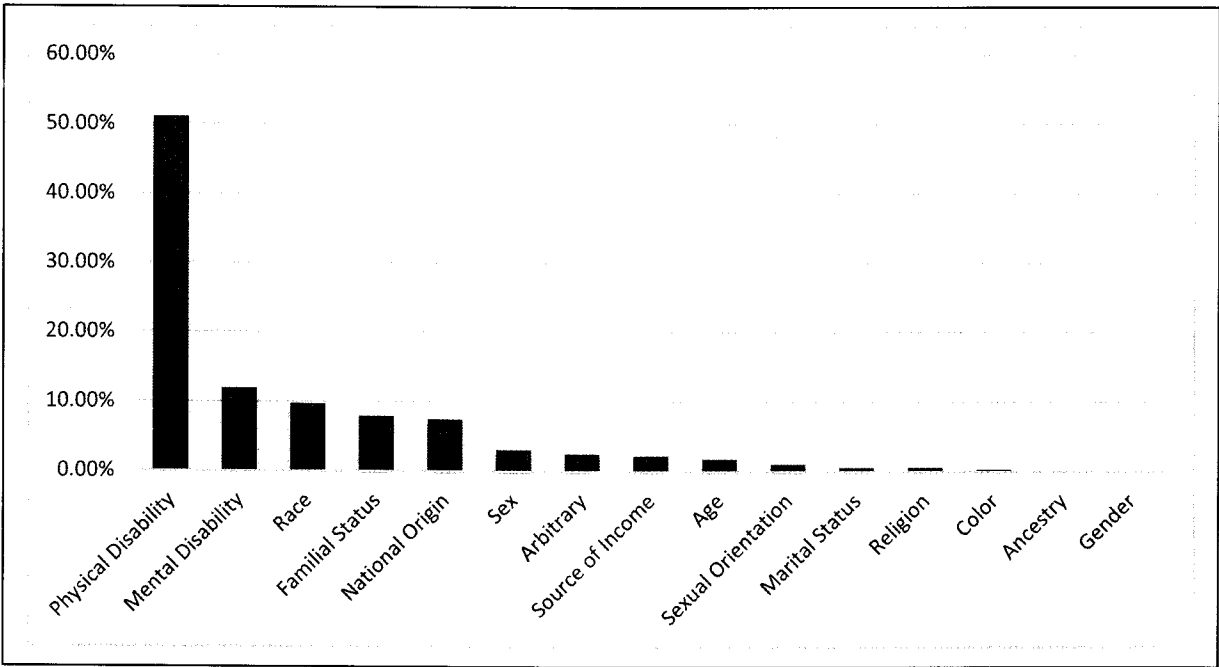
During the five-year period studied, FHCRC assisted county residents with fair housing discrimination complaints, addressing 3,108 complaints in total, with 95 percent of those from in-place tenants, 3 percent from landlords or managers and the balance from other types of complainants. Consistent with 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>	<b>100%</b>

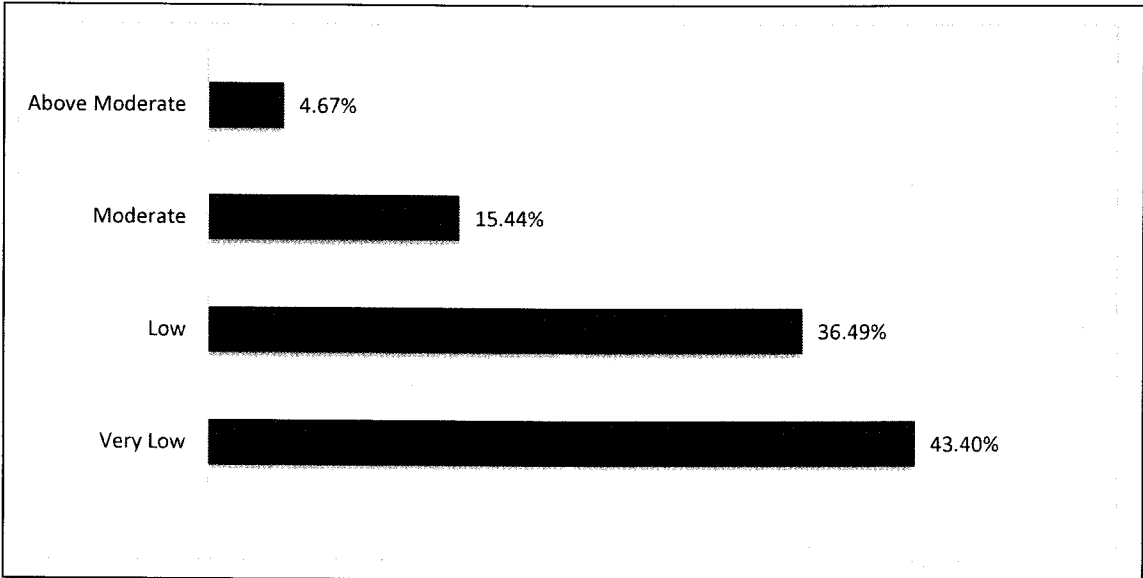
Source: FHCRC Quarterly Reports, July 1, 2013 – June 30, 2018.

**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.

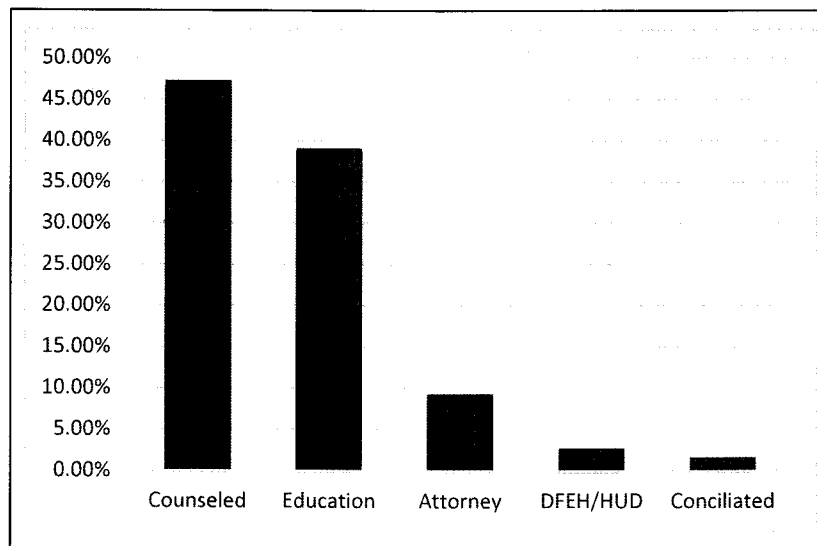
Table V-3 and Graph V-3 show the services rendered for the 3,108 discrimination complaints during the five-year period of evaluation.

**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.