

COUNTY OF RIVERSIDE 2014 FAIR HOUSING IMPEDIMENTS STUDY



Prepared by
Riverside County Economic Development Agency
Rob Field, Assistant County Executive Officer/EDA

**COUNTY OF RIVERSIDE
2014 FAIR HOUSING IMPEDIMENTS STUDY**

Board of Supervisors

Jeff Stone, Chairman
Marion Ashley, Vice-Chairman
Kevin Jeffries, Supervisor
John F. Tavaglione, Supervisor
John J. Benoit, Supervisor

Prepared by

Riverside County
Economic Development Agency
Rob Field, Assistant County Executive Officer/EDA

Heidi Marshall, Assistant Director
Suzanne Holland, Assistant Director

Technical Assistance

Fair Housing Council of Riverside County, Inc.
Rose Mayes, Executive Director

Printed
March 2014

Table of Contents

I	Introduction	
A.	Purpose	1
B.	Methodology	1
C.	Summary of 2009 Study	2
II	Community Profile	
A.	Population Characteristics	7
1.	Background	7
2.	Population and Ethnicity	7
3.	Income Characteristics	10
4.	Employment and Transportation	11
5.	Housing	11
6.	Poverty and Income	13
7.	Projections	14
B.	Current Fair Housing Profile	14
1.	Landlord/Tenant Discrimination Complaints	14
2.	Countywide Complaints	18
III	Impediments to Fair Housing	
A.	Obtaining Housing	19
1.	Real Estate Practices	19
2.	Sale and Rental of Housing	20
3.	Fair Housing Audit Update	20
4.	Publicly Assisted Rental Housing	20
5.	Financing: Evaluation of Home Mortgage Disclosure Act Reports	21
B.	Public Policies and Actions	26
1.	Background	26
2.	Zoning Ordinances	27
3.	General Plans	29
4.	Fair Housing	29
5.	Housing Programs	30
6.	Evaluations of Housing Elements, Goals and Policies – Observations	30
7.	Bond Financing	32
8.	Taxation	32
C.	Housing Program Administrative Policies	32
1.	Housing Authority	32
2.	CDBG/HOME	33
3.	Complying Programs/Non impediments	33
D.	Summary of Impediments to Fair Housing	34
1.	Background	34
2.	Summary of Impediments	35
IV	Recommendations	
A.	Conclusions and Recommendations	39
B.	Analysis of Impediments Matrix	39
V	Appendices	43
A.	Glossary of Terms	
B.	Fair Housing Audit Analysis 2013	

- C. County of Riverside Ethnic Concentration
- D. County of Riverside Low/Moderate Income Areas

List of Tables

Table II-1	Riverside County Population and Ethnic/Racial Distribution.....	8
Table II-2	Riverside County Population by Age.....	9
Table II-3	Income Distribution in Riverside County	10
Table II-4	Very Low and Low Income Households in Riverside County	11
Table II-5	Riverside County Housing Stock	12
Table II-6	Riverside County Cost of Housing	12
Table II-7	Persons by Race/Ethnicity and Poverty Level Status in Riverside County	13
Table II-8	Landlord Tenant Discrimination Complaints Filed in Riverside County	15
Table II-9	Complaints	16
Table III-1	Loan Origination and Denial Rates by Type of Loan	22
Table III-2	Loan Origination and Denial Rates by Type of Race	23
Table III-3	Loan Origination and Denial Rates by Type of Income	24
Table III-4	Reasons for Denial of Loans	25

List of Figures

Figure 1	Riverside County Population Shares by Race/Ethnicity	9
Figure 2	Riverside County Complaint Category	17
Figure 3	Riverside County Discrimination Complaints Received	17

SECTION I INTRODUCTION

The mission of the County of Riverside is to promote economic opportunity and affordable housing that provides a suitable living environment, free of discrimination to all persons.

A. Purpose

It is the intention of the County to provide community development and housing opportunities without regard to arbitrary factors and affirmatively further fair housing on a countywide basis. Fair Housing Choice can be defined as the ability of persons of similar income and have available to them the same housing choices without regard to race, color, national origin, religion, sex, familial status, disability, ancestry, marital status, source of income, sexual orientation, or other arbitrary factors.

The County has prepared this update of its Fair Housing Impediments Study pursuant to 24CFR 570.904(c)(1) of the Community Development Block Grant (CDBG) regulations. The CDBG program is funded and administered by the federal government through the Department of Housing and Urban Development (HUD). The purpose of this study is to revisit the County's 2009 Fair Housing Impediment Study (2009 Study) and to determine if the impediment findings at the time have been addressed and resolved. Areas of review in the 2009 Study extended beyond fair housing choices within the County and the County's CDBG Cooperating Cities to include impediments relating to the sale or rental of dwellings, the provision of housing brokerage services, the provision of financing for housing, public policies and actions, and administrative policies concerning community development and housing activities. A list of terms and definitions used in this report can be found in the Appendix A.

B. Methodology

The two primary sources used to analyze data for this study consist of the following: published literature, policies and data; and the fair housing audit developed and conducted specifically for the purpose of this study to identify the incidents of unfair treatment. In addition to the 2014 study, the literature and data reviewed for this study included:

- Riverside County's General Plan
- Ordinances
- The general plans/zoning ordinances of the 13 CDBG cooperating cities
- Riverside County housing and community development programs and administrative policies

- Data collected by the Fair Housing Council of Riverside County, Inc. pursuant to the contract to provide fair housing services for the County
- Demographic data (Countywide areas –unincorporated and incorporated)
- Home Mortgage Disclosure Act (HMDA) reports
- Community Reinvestment Act (CRA) information pertaining to lending institutions throughout the County
- Other studies and analyses of fair housing opportunities

The Fair Housing Council of Riverside County (FHCRC) has been contracted by the County to provide fair housing services for the unincorporated areas as well as the County's 13 CDBG Cooperating Cities. The County's Urban County CDBG Program consists of the unincorporated communities, thirteen (13) participating cities, and one Joint/Metropolitan City. The participating cities are: Banning, Beaumont, Blythe, Canyon Lake, Coachella, Desert Hot Springs, Eastvale, Indian Wells, La Quinta, Murrieta, Norco, San Jacinto, and Wildomar (Cooperating Cities). The City of Lake Elsinore is considered a CDBG Entitlement City, and receives a CDBG allocation from HUD. However, the City has elected to participate in the County's Urban County program as a Joint Metro City/Urban County applicant. All fourteen (14) cities signed a three year cooperation agreement for program years 2012/13 through 2014/15.

The services provided by the FHCRC include anti-discrimination activities, landlord/tenant mediation, technical assistance, and fair housing education. In addition to opening satellite offices in the eastern part of the County to serve the desert region, a specific component of the County's 2013/2014 CDBG contract with the FHCRC is the Proactive Technical Assistance Testing Component, also referred to as the Fair Housing Audit. The purpose of audit is to identify current impediments and provide recommendations that the County will review and implement or address on a continuous basis.

As directed, FHCRC conducted objective, proactive testing in the areas of rental housing, for-sale housing and housing finance. Five target locations were selected as a representative sample of jurisdictions countywide. FHCRC conducted 12 validated tests for rental housing, 6 validated tests for the sale of the housing, and 6 validated tests for housing finance. The results of these tests are contained within this study, and the complete report, Fair Housing Audit Analysis, prepared by the FHCRC is included as Appendix B.

C. SUMMARY OF 2009 STUDY

The Fair Housing Impediments Study prepared by the County of Riverside in 2009 consists of the following chapters:

1. Introduction, which presents the Study's purpose and the methodologies utilized in its preparation.
2. Community Profile, which describes the characteristics of the study area's population, as well as the area's fair housing profile.
3. Impediments to Fair Housing Choice, which outlines the procedures involved in obtaining housing, the policies and actions of public bodies as they pertain to protecting fair housing choice, and the administrative policies of various bodies responsible for implementing those policies.
4. Recommendations, which provides recommendations for ensuring fair housing choice within the County and its CPD Cooperating Cities, as well as recommended procedures to be followed by the Fair Housing Council of Riverside County.
5. Appendices, consisting of the following documents and exhibits:
 - 2008 Fair Housing Audit Analysis prepared by the Fair Housing Council of Riverside County, Inc.
 - Racial/Ethnic Concentration Map prepared by the County of Riverside
 - Low/Moderate Income Concentration Map prepared by the County of Riverside

The findings of the 2009 Study indicated the following:

While it can be difficult to prove that discrimination has occurred, the concentration of complaints, particularly complaints of a similar type is a reasonably good indicator that some sort of problem exists. The 2009 Study concluded that, based on an evaluation of data presented therein, discrimination based on disability and race represented the most common categories of complaint. The report also suggested that discrimination persisted countywide in the categories of family status as well as in the mortgage lending industry. The conclusion regarding disability, race, and family status was supported by the experience of FHCRC testers, who reported instances of discrimination.

The 2009 Study discussed the following categories of potentially significant impediments to a fair housing choice within the County and its Cooperating Cities:

- Increased need for additional affordable rental housing due to the effects of the foreclosure crisis in California
- Lack of available housing in Riverside County
- Discrimination in housing accessibility based on disability and race

- Unequal treatment of persons in the sale and rental of housing based on disability and race
- Discrimination in the rates of housing loan approvals based on race
- Potential impediments created through Housing Elements
 - Housing Elements that have not been reviewed and approved by the State of California and therefore have the potential to be out of compliance with state laws regarding housing availability
- Potential impediments created through Land Use Controls
 - Zoning ordinances that do not include state-mandated density bonus rules for affordable housing

The 2009 Study then presented the following recommendations regarding the elimination of these impediments:

Increased Need and Lack of Affordable Housing

- Alleviate governmental constraints to include reduction in developer fees which add to the cost of housing and developer costs, a major impediment to fair housing in that the fees are passed on to the homeowner through the purchase price or the rent charged.
- Recommend that each Cooperating City develop a fast track/priority processing systems for affordable projects.
- Reduce the cost of housing to the consumer, be it rental or single-family homes, through the elimination of unnecessary governmental actions, policies and regulations.
- Minimize the impact of nongovernmental constraints beyond the control of local government that potentially can impact any action of the City or County Processing.

Discrimination in Housing Accessibility

- Broaden the understanding of diversity in cultures in various communities through education, training, and outreach seminars, regarding Fair Housing laws and cultural sensitivity to rental property owners, managers, and agents, as well as apartment owners associations, board of realtors, management companies, lending institutions, building industry associations, and home seekers.

Unequal Treatment in Sale and Rental of Housing

- Conduct audits periodically to determine the nature, extent and changes in housing discrimination throughout the audited cities. These audits should be expanded to include other characteristics such as discrimination based on race, sex, sexual orientation, religion, and any other protected classes defined by law. The results of the audits should be provided to FHCRC so that they can be tracked and used to supplement information routinely recorded by FHCRC's systems.
- Develop an anti-discrimination campaign and literature focusing on fair housing law and enforcement activities on both the purchase and rental market.
- Promote fair housing laws in rental housing, mortgage lending, and real estate sales markets within the audited cities.
- Encourage rental property owners, managers, realtors and lending agents to provide written information to all applicants that includes the listing of all available housing, standard information on the terms and conditions of the application process, posting Fair Housing informational signs, and providing Fair Housing literature.

Discrimination in Rates of Housing Loan Approvals

- Provide homebuyer education, credit counseling, and fair housing counseling and awareness training to the first time homebuyers and homeowners, particularly low income and very low income applicants.

Potential impediments created through Housing Elements and Land Use Controls

- Ensure that CDBG cooperating cities have an approved Housing Element that incorporates state mandated density rules into their respective zoning ordinances. Not all CDBG Cooperating Cities evaluated in this study have an approved Housing Element.
- Develop zoning ordinances and the General Plan throughout the County that are consistent in establishing Density Bonus projects in mixed/regional commercial and high density residential areas, and for multiple bedroom density bonus projects.
- Establish a wider range of zoning and specific plan implementation to meet affordable housing needs by the Cooperating Cities.
 - Each CDBG Cooperating City should develop zoning codes similar to Ordinance No. 348, an ordinance of the County of Riverside providing for land use planning, zoning regulations, and related functions.

Discrimination Based on Disabilities

- Provide education and outreach to housing providers through seminars or community workshops to inform the public of the current law on discrimination against the disabled.

Shortfalls in FHCRC Data Collection

- Amend Cooperating Cities' General Plan Housing Elements to ensure that they are in compliance with state laws regarding housing availability, and have them reviewed and approved by the State of California within a specified timeframe
- Encourage Cooperating Cities to promote and utilize Fair Housing Program Services on the behalf of their residents
- To the maximum extent practical, shift FHCRC resources from landlord/tenant information services to discrimination prevention and enforcement activity support
- Have FHCRC provide training to CDBG grant recipients in various aspects of fair housing law compliance
- Implement a FHCRC-managed system that will track discrimination complaints on a demographic/geographic basis to enhance reporting capabilities
- Target the mortgage industry for specific FHCRC testing to establish the approximate extent of discrimination within the industry
- Continue FHCRC-provided education to landlords and property management firms in fair housing laws and regulations as they pertain to the rental housing industry
- Continue and expand fair housing outreach programs intended to meet the needs of the County's Hispanic population, including the development of marketing materials and presentations in Spanish

SECTION II COMMUNITY PROFILE

A. POPULATION CHARACTERISTICS

1. Background

Riverside County is the fourth largest county in California and was founded in 1893. It is one of the most diverse counties in California. The County contains 28 incorporated cities and spans an area of 7,207 square miles. The County is bounded by San Bernardino County on the north, Orange County on the west, San Diego and Imperial Counties on the south and the Colorado River and the State of Arizona on the east. It offers its residents and visitors a wide range of unique lands that differ in physical, climatic and biotic conditions. There are fertile valleys with an extensive array of agricultural crops; undulating and rugged terrain with beautiful mountains, streams and rivers; and deserts.

Of the aforementioned 28 incorporated cities, 13 are “Cooperating Cities” that participate in the HUD-funded Community Planning and Development (CPD) program’s Community Development Block Grant (CDBG) Program as “sub-grantees”. In addition, there are dozens of unincorporated communities within the County, and extensive landholdings managed by state and federal agencies.

According to population projections by the California Department of Finance, Riverside County will have the largest growth over the next 50 years (2010 to 2060) of any county in the state, growing by approximately 2 million. Riverside will become the second most populated county in the state at 4.2 million, trailing only Los Angeles at 11.6 million. The Inland Empire, which includes Riverside and San Bernardino counties, is expected to grow by 3.4 million. In recent years, many who have relocated to the County have continued to work in and commute to Orange and Los Angeles Counties. Table II-1 shows Riverside County’s population, ethnic distribution and rate of growth as tabulated in the 2010 Census and the Census Bureau’s 2012 American Community Survey (ACS).

2. Population and Ethnicity

Much of the population growth of the last decade within the County is due to its location within the Southern California region. The combination of Southern California’s job market, transportation, infrastructure, lower housing prices and inexpensive and plentiful land for housing has contributed to increased development pressures countywide. The growth resulting from these factors has also resulted in a diversification of the economic base of the County, and has led to increased industrial, commercial and tourism-related development. Agriculture continues to be economically important and is expected to remain a viable industry in the future. Changing economic, political and environmental factors are expected to have significant effects on future growth in the County.

Table II-1

Riverside County Population and Ethnic/Racial Distribution						
	2010	2010	2012	2012	Numeric	Percent
	Number	Percent	Number	Percent	Change	Change
White	870,682	39.5%	871,815	38.4%	1,133	0.1%
Hispanic	1,004,418	45.6%	1,055,510	46.5%	51,092	5.1%
Black or African American	126,931	5.7%	134,585	5.9%	7,654	6.0%
Asian	128,595	5.8%	130,057	5.7%	1,462	1.1%
American Indian and Alaska Native	9,566	0.4%	10,835	0.5%	1,269	13.3%
Native Hawaiian & Other Pacific Islander	6,588	0.3%	6,050	0.3%	-538	-8.2%
Other race	4,719	0.2%	2,553	0.1%	-2,166	-45.9%
Two or more races	51,833	2.4%	57,378	2.5%	5,545	10.7%
Total	2,203,332		2,268,783			
Source: 2010 and 2012 American Community Survey, One Year Estimates						

As indicated in Table II-1, the largest growing ethnic group in the County is Hispanic residents, up by 51,092 persons or 5.1% from 2010 to 2012. However, the American Indian and Alaska Native population grew by a larger percent (13.3%) or by 1,269 persons during that time period. Residents of Black or African American heritage grew by 7,654 (6%), and Asian residents by 1,462 persons (a 1.1% increase). According to the California Department of Finance, by the year 2020, it is estimated that the Hispanic population will increase to 1,226,257, the population of Black/African Americans will increase to 159,275 and the Asian population will total approximately 176,634.

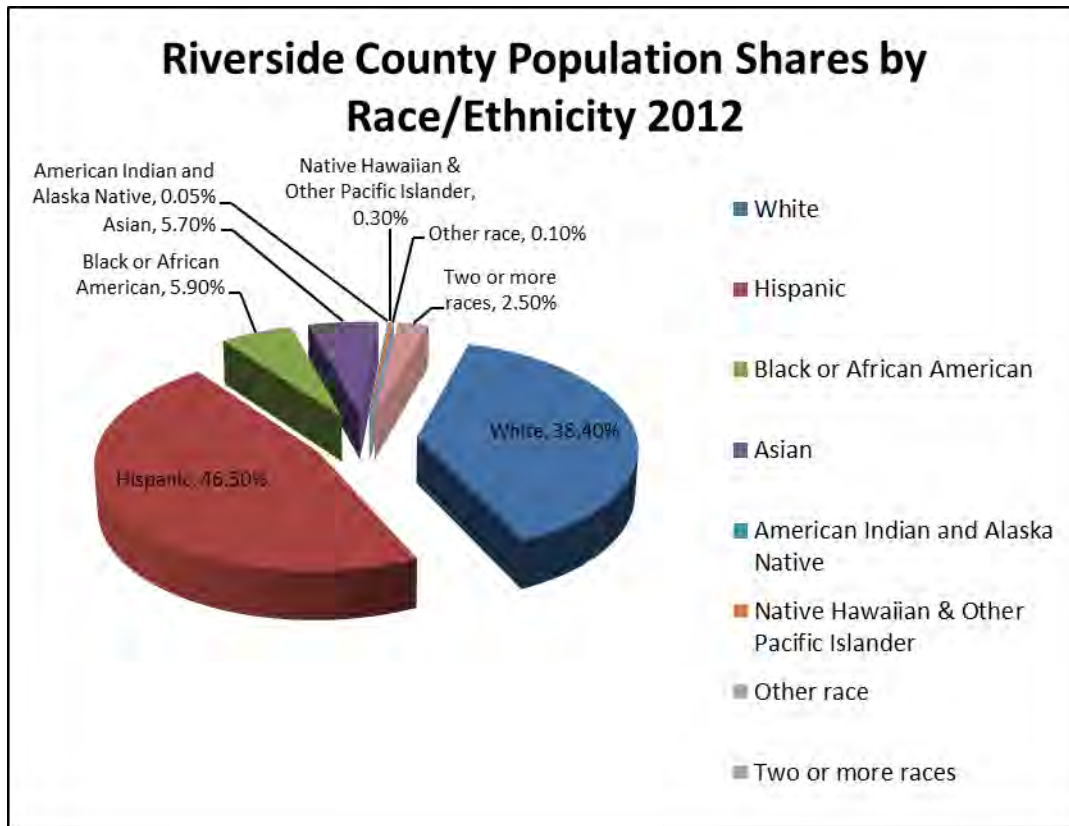
Hispanics represent the single largest group of the County's population at 46.5%, surpassing Whites at 38.4%. The White population had the third lowest growth rate (0.1%) of any ethnic/racial group in the County from 2010 to 2012, ahead of Native Hawaiian and Other Pacific Islander and Other race with declining populations of -8.2% and -45.9% respectively. California's White population has declined by 247,914 from 2000 to 2007, representing a 1.6% decrease.

According to the 2010 ACS, females represent 1,138,987 (50.2%) of the County's total population of 2,268,783. The County placed fourth overall in population in the State of California but by 2060 is expected to become the second most populated county in the State of California, second only to Los Angeles.

Maps depicting ethnic concentrations for the Supervisorial Districts of Riverside County by census tracts are included in Appendix C. The exhibits indicate areas where the presence of ethnic concentrations are 55.5% or greater. The higher concentrations are represented by darker color.

Figure 1 below shows the population shares by race and ethnicity based on the 2012 ACS.

Figure 1



According to the 2010 Census, 95.4% (2,088,429 persons) of Riverside County's residents reside in urban locations and 4.6% (101,212 persons) reside in rural areas. An evaluation of residents countywide as shown in Table II-2 indicates that in 2012, 27.3% were under 18 years of age, 60.2% were between the ages of 18 and 64, and 12.4% were 65 or older. In 2012 the countywide median age was 34.

Table II-2

Riverside County Population by Age				
	2010		2012	
Age < 18 Yrs.	623,638	28.3%	621,040	27.3%
Age 18-64 Yrs.	1,318,983	59.8%	1,366,330	60.2%
Age 65 & over	260,711	11.8%	281,413	12.4%
Total	2,203,332	100.0%	2,268,783	100.0%
Source: 2010 and 2012 American Community Survey: One Year Estimates				

3. Income Characteristics

The County's median household income in 2012 was \$52,621, a decrease of 3.1% over the 2010 median household income of \$54,296. The 2009 HUD Area Median Family Income (HAMFI) for Riverside County was \$64,500. In 2013 the HAMFI for Riverside County was \$62,600, which is a 2.9% decrease over the past five years.

Table II-3 presents the breakdown of the total households and the income brackets in which they fall, as recorded in the 2012 ACS.

Table II-3

Income Distribution in Riverside County – 2012		
Household Income	Total Households	Percent
Less than \$10,000	40,884	6.0%
\$10,000 to \$14,999	37,131	5.4%
\$15,000 to \$24,999	78,164	11.4%
\$25,000 to \$34,999	71,160	10.4%
\$35,000 to \$49,999	98,067	14.3%
\$50,000 to \$74,999	122,548	17.9%
\$75,000 to \$99,999	89,653	13.1%
\$100,000 to \$149,999	88,589	12.9%
\$150,000 to \$199,999	35,537	5.2%
\$200,000 or more	23,527	3.4%
Total	685,260	100%
Median family income	\$59,437	
Median household income	\$52,621	
Source: 2012 American Community Survey: One year Estimate		

An evaluation of households by income category from the HUD Comprehensive Housing Affordability Strategy (CHAS) databook indicates that in 2000, 112,423 households had incomes at or below 50% of the median income and were considered very-low income. These households represented 24.2% of the total households countywide. In year 2010, this number increased to 173,218 households, a 54.1% increase over a ten year period. Appendix D consists of maps depicting concentrations of Low/Mod areas in the County based on HUD Low and Moderate Income Summary Data, FY13. Table II-4 provides a breakdown of low and very low income data based on 2006-2010 CHAS data.

Table II-4

Low and Very Low Income Households in Riverside County							
			Renters				
Households by Income	Elderly (1 & 2 members)	Small Related (2 to 4 members)	Large Related (5 or more members)	All Other	Total Renters	Total Owners	Total Households
< = 50 MFI	18,927	56,153	28,200	30,707	88,928	84,158	173,218
> 50 to < = 80% MFI	17,666	48,375	26,417	17,430	49,017	79,198	128,215
> 80% MFI	58,966	208,970	70,068	88,669	61,490	339,313	427,928
Total Households	95,559	313,498	124,685	136,806	199,435	502,669	729,361
Source: 2006-2010 CHAS Data							

4. Employment and Transportation

In the 2012 ACS, Riverside County had a total of 1,039,812 persons age 16 and older in the labor force. The civilian labor force represented 1,035,138 persons, or 99.6% of the total labor force. In 2012, 152,235 persons were unemployed, for an unemployment rate of 14.7% of the civilian labor force. The local economy is still recovering from the recession, ignited by the collapse in the housing market caused by one of the highest foreclosure rates in the nation. Not only did the construction and lending industries decline, but the wave of unemployment trickled into almost every area, which included retail and manufacturing. The most recent figures show an estimated unemployment rate of 9.1% for Riverside County in December 2013.

According to the California Employment Development Department, industries with the largest employment in Riverside County in December 2013 were Total Wage and Salary (1,210,600 employed), Total Nonfarm (1,194,900 employed) and Service Providing (1,046,400 employed). According to the 2012 Riverside County Agricultural Production Report, countywide agricultural production totaled 1.25 billion dollars. Riverside County is the thirteenth-largest agricultural producing county in California.

The primary mode of transportation for Riverside County residents is the automobile. The County has an extensive road network which includes Interstate Freeways, State Highways and local roads. Public bus transportation is available in the more populous locations. Commuter rail service from Riverside into Los Angeles County, Orange County and San Diego County is now available.

5. Housing

According to the 2012 ACS, 805,050 housing units were counted in Riverside County. This figure represents an increase of 0.5% over the 2010 Census count of 800,707. Of the total housing units, 685,260 were occupied which translates to an overall vacancy of 14.9%. Of the occupied housing units, 243,096 (35.5%) of the units were renter-

occupied housing units and 442,164 (64.5%) were owner-occupied housing units. In addition, 5.9% of existing rental units were vacant while 2.2% of owner-occupied units were vacant. Table II-5 presents the housing distribution in Riverside County based on the 2010 and 2012 ACS.

Table III-5

Riverside County Housing Stock					
	2010		2012		Percent Change
Single Family Units	594,406	74.2%	599,506	74.5%	0.9%
Multiple Family Units	132,038	16.5%	133,477	16.6%	1.1%
Mobile Homes	73,182	9.1%	70,694	8.8%	-3.4%
Other (Boat, RV etc.)	1,698	0.2%	1,373	0.2%	-19.1%
Total	801,324	100.0%	805,050	100.0%	0.5%
Source: 2010 and 2012 American Community Survey: One year Estimates					

According to the 2012 ACS, the number of households in the County increased by 15,215 to a total of 685,290 households. This is a 2.3% increase since the 2010 Census. Riverside County had the second largest household increase in the State of California from 2000 to 2007. Southern California Association of Governments (SCAG) forecasts that the number of households will continue to increase to 834,000 households by the year 2020.

Units with more than one person per room are considered overcrowded. In Riverside County, 7.8% of the occupied inventory had more than one person per room.

Table II-6 presents the median home value, median rent and median household income for both 2010 and 2012.

Table II-6

Riverside County Cost of Housing			
	2010	2012	Percent Change
Median Home Value	227,900	220,000	-4%
Median Rent	1,121	1,129	1%
Median Household Income	\$54,296	\$52,261	-4%
Source: 2010 and 2012 American Community Survey: One year Estimates			

Over forty-seven percent (47.6%) of homeowners and 19.6% of Riverside County renters devote 30% or more of their household income to housing cost.

As of 2010, approximately 33.1% of the County's housing stock was 30 years or older, compared to 25.1% in 2000. As the County's housing ages, maintenance and repair

become more critical. If homes fall into disrepair, residents may be subject to unsafe and/or unhealthful living conditions. If maintenance is ignored long enough, housing may become uninhabitable, reducing the total number of units available within the County.

In the County Market Update for December 2013, the California Association of Realtors® reports that the median home price for Riverside County is \$310,020, which is a year to year increase of 23.3%. Housing affordability will remain an issue as median home prices increase and homeownership opportunities decline especially for low-income families.

6. Poverty and Income

The proportion of the Riverside County population living below the poverty threshold varies widely by race and ethnicity. Table II-7 shows the number of persons that are below poverty level across all races.

Table II-7

Persons by Race/Ethnicity and Poverty Level Status in Riverside County						
Race/ Ethnicity	Poverty Level Status				% of Race Below Poverty	
	Below Poverty		At or Above Poverty		Below Poverty	
	2010	2012	2010	2012	2010	2012
White (ALONE)	198,862	228,600	1,268,521	1,240,746	13.6%	15.5%
Black or African American	26,563	31,841	103,870	104,346	20.4%	23.4%
Asian	16,003	11,738	114,975	117,689	12.2%	9.1%
American Indian and Alaska Native	3,795	3,137	13,939	15,499	21.4%	16.8%
Native Hawaiian and Other Pacific Islander*	N/A*	N/A*	N/A*	N/A*	N/A*	N/A*
Other race	93,529	99,828	228,992	278,739	28.9%	26.4%
Two or more races	12,970	16,204	78,866	74,831	14.1%	17.8%
Total County	354,152	398,102	1,817,252	1,836,015	16.3%	17.8%
Hispanic**	224,642	249,697	765,815	789,808	22.7%	24.0%
*Data cannot be displayed because the number of sample cases is too small, but is included in the total.						
**Hispanics can be of any race.						
Source: 2010 and 2012 American Community Survey: One year Estimates						

According to the data, approximately one in six Riverside County residents or 17.8% (398,102) of the population lived below poverty in 2012. The number of Hispanics that were below poverty increased from 224,642 in 2010 to 249,697 in 2012, an 11.2% increase. In high poverty areas such as the eastern part of Riverside County, households tend to spend more than 30% of their income in rent. In 2012, the number

of households that paid 30% or more of their income in rent was 139,706 out of 230,717 or 60.6%. In 2010, 127,258 out of 202,815 or 62.7% paid amounts exceeding that threshold. This represents a 9.8% increase in the number of households that were cost burdened over the two year period. The tight supply of affordable housing increases the pressures on these residents.

7. Projections

SCAG projects that the County's total population will reach 2,592,000 in 2020, representing a growth rate of 21.8% over the twelve year period from 2008 to 2020. SCAG also projects that the number of households in Riverside County will reach 834,000 in 2020, a 22.8% growth rate from 2008 to 2020.

Long-range projections from the California Department of Finance show that the County's total population will reach 4,216,816 by 2060, growing by 92.4% from 2010 to 2060. Riverside County is expected to have the largest growth and be the second most populated county in California, behind Los Angeles County's 11.6 million people and ahead of San Diego County's 4.2 million residents.

B. CURRENT FAIR HOUSING PROFILE

1. Landlord/Tenant and Discrimination Complaints

As has been previously stated, the FHCRC addresses complaints relating to landlord/tenant disputes and housing discrimination.

a. Landlord/Tenant Complaints

Landlord/tenant complaints involve alleged violations of the California Civil Code as it relates to the legal responsibilities and duties of landlords and tenants. The FHCRC is set up to provide technical assistance and mediation services to both parties involved in a landlord/tenant dispute. According to the FHCRC, most landlord tenant disputes that are actual violations of the Civil Code consist of illegal evictions, unlawful retention of security deposits, and breaches of the warranty of habitability. If left uncorrected, legitimate violations have the potential to create impediments to fair housing by limiting access to housing of choice, affordable or otherwise.

Table II-8

LANDLORD TENANT CALLS																									
	Case Category																		Action						
	Eviction	Repairs	Deposits	Entering	Occupancy	Mobilehome	Lease	Other	Late	Rent Inc.	Sec 8	Notice	Habitability	Mold	Rental Assistance referrals	Homeless Assistance	Lead	Total	Mediation	Counseled/Referred	Resolved	Total	Senior	Disabled	FHH
FY08-09	654	871	160	63	10	51	483	348	3	43	8	86	13	14	0	0	1	2808	26	1495	278	1799	64	55	257
FY09-10	483	804	123	72	3	41	197	349	5	16	26	163	57	39	2	7	0	2387	38	1119	120	1277	41	55	114
FY10-11	384	1178	312	137	25	68	264	1024	19	69	32	568	74	271	23	9	3	4460	190	993	415	1598	123	236	406
FY11-12	432	1072	262	119	30	42	275	695	21	59	74	430	99	86	20	51	54	3821	121	1318	0	1439	84	234	357
FY12-13	323	1008	402	130	80	62	595	490	6	56	9	543	93	101	32	10	0	3940	86	1433	0	1519	90	224	330
TOTAL	2276	4933	1259	521	148	264	1814	2906	54	243	149	1790	336	511	77	77	58	17416	461	6358	813	7632	402	804	1464

LANDLORD TENANT CALLS																							
	Income					Race																	
	Very Low	Low	Moderate	High	Total	White	Black	Hispanic	Asian	Black & White	Other	Black & Hispanic	American Indian or Alaskan	Pac Islander	Native American White	Asian & White	Asian & Latino	Other & Latino	American Indian/Alaskan & Hispanic	American Indian/Alaskan Native, Black & Hispanic	Other Multi Race Non-Hispanic	unknown(Other Mult Race/Non Hispanic on 9902)	Total
FY08-09	342	1719	736	11	2808	1490	362	907	8	10	13	0	0	17	1	0	0	0	0	0	0	0	2808
FY09-10	528	1279	489	91	2387	974	281	1058	28	6	26	5	2	0	0	7	0	0	0	0	0	0	2387
FY10-11	1960	1762	548	190	4460	2117	610	1597	23	8	23	25	1	0	0	4	5	9	0	1	17	20	4460
FY11-12	1968	1228	453	172	3821	1684	593	1381	68	10	0	6	11	9	0	5	4	9	0	0	7	34	3821
FY12-13	1653	1460	594	233	3940	1815	589	1406	29	2	8	3	12	3	0	0	0	30	5	0	17	21	3940
TOTAL	6451	7448	2820	697	17416	8080	2435	6349	156	36	70	39	26	29	1	16	9	48	5	1	41	75	17416

Table II-8 presents data regarding the total number of landlord/tenant inquiries or “complaints” received by the FHCRC between July 2008 and June 2013 and the ultimate disposition of those complaints going beyond mere information dissemination. When a comparison is made of cases referred for legal services, approximately 6,358 of the complaints were ultimately counseled and/or recommended for referral to another agency or an attorney. Lastly, cases mediated countywide totaled approximately 461 of all complaints filed between July 2008 and June 2013.

b. Discrimination Complaints

Complaints relating to housing discrimination involve alleged violations of both state and federal fair housing laws as they apply to the rental and purchase of housing units. Under these laws, housing consumers cannot be treated unfairly or differently based on race, disability, familial status (i.e. presence of minor children), sex, national origin, color, source of income, sexual orientation, religion, marital status, age, or other arbitrary factors. When housing discrimination complaints based on one or more of these categories are received, the FHCRC will attempt to seek a resolution. If efforts to resolve a case are unsuccessful and the supporting documentation appears to be weak, the case is given to the State Department of Fair Employment and Housing (DFEH) for further investigation.

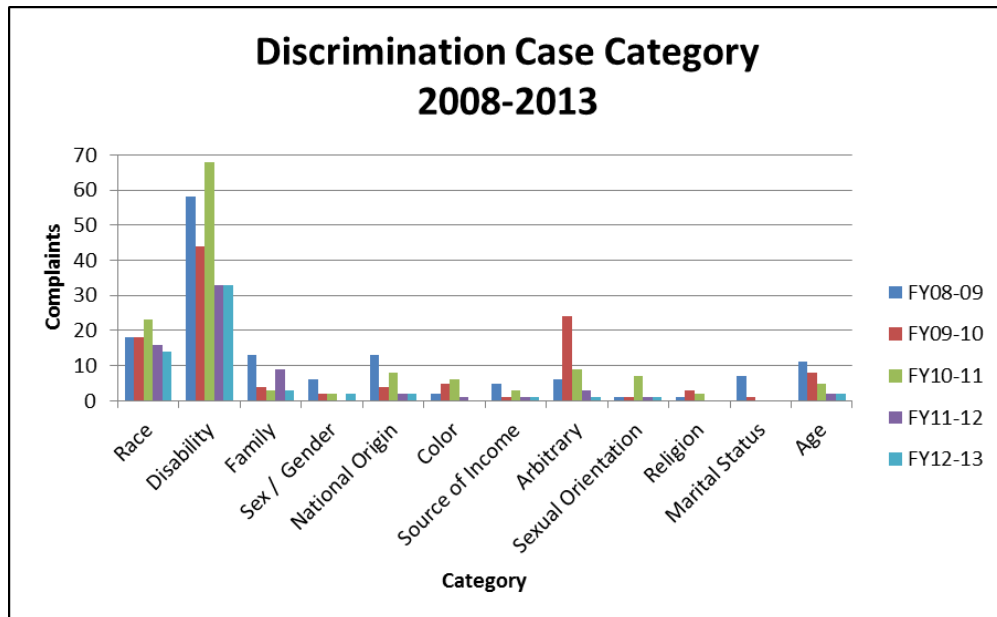
Table II-9

Discrimination Complaints 2008-2013													
	Race	Disability	Family	Sex / Gender	National Origin	Color	Source of Income	Arbitrary	Sexual Orientation	Religion	Marital Status	Age	Total
FY08-09	18	58	13	6	13	2	5	6	1	1	7	11	141
FY09-10	18	44	4	2	4	5	1	24	1	3	1	8	115
FY10-11	23	68	3	2	8	6	3	9	7	2	0	5	136
FY11-12	16	33	9	0	2	1	1	3	1	0	0	2	68
FY12-13	14	33	3	2	2	0	1	1	1	0	0	2	59
Total	89	236	32	12	29	14	11	43	11	6	8	28	519

Table II-9 examines twelve categories of housing discrimination monitored by the FHCRC. The data presented covers a five-year time period and includes the unincorporated part of the County and CDBG cooperating cities. The FHCRC logged records of discrimination complaints by the city of origin in the intake process. Since 2004 The FHCRC has been tracking discrimination complaints emanating from CDBG cooperating cities by city of origin.

An examination of the data in Table II-9 indicates that discrimination falling under the separate categories of race, family status, and disability violations comprised of 16%, 8%, and 47% of the complaints, respectively, or 71% of the total complaints received during the aforementioned five year span (2008-2013).

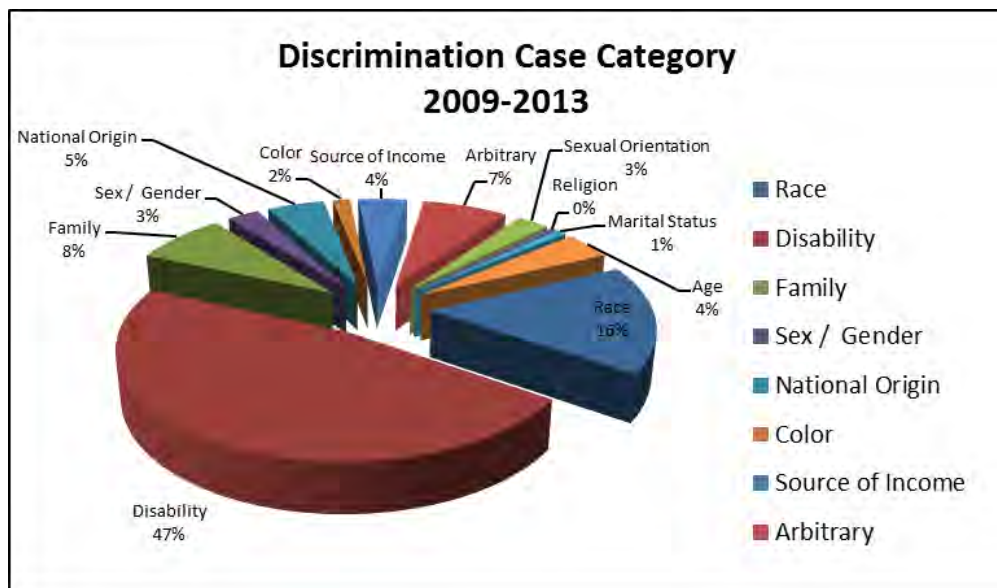
Figure 2



Figures 2 and 3 give a pictorial representation of each complaint category for the past five years.

While in the 2009 Fair Housing Study race was not the highest category of complaints in the last several years, it is cited as the second highest complaint for the past five years. As identified in Figure 3, disability continues to be the leading discrimination complaint for the current reporting period.

Figure 3



Family status category was cited as the third most complaint received in three out of four year time span. Despite efforts to educate and mitigate, the problem appears to be an ongoing issue. This category was among the top three complaints cited in the past two years and is the number three complaint category received in the four-year time span. The increased outreach by FHCRC to the public is a major factor in educating the public. However, with the tight housing market and lack of affordable large housing units, it remains a challenging environment.

An evaluation of additional data provided indicates that a total of 519 discrimination complaints were filed with the FHCRC. Of the 519 complaints filed, approximately 403 were conciliated, 115 were referred to either a private attorney, HUD-or DFEH for further action, and 1 case is pending resolution.

2. Countywide Complaints Received by HUD and DFEH

The Department of Housing and Urban Development (HUD) continues to receive fair housing discrimination complaints that cannot be resolved at the local level through organizations such as the FHCRC. The number and type of countywide complaints initially received by the Fair Housing Council of Riverside County and which were subsequently forwarded to HUD are included in Table II-9. The figures cover the time period from 2008 to 2013. Countywide complaints include complaints originating in jurisdictions that are non-cooperating (CDBG) cities as well as those originating in cooperating cities and unincorporated county areas. As can be seen, alleged discrimination based on the categories of disability, race, and family status drew the highest number of complaints.

SECTION III

IMPEDIMENTS TO FAIR HOUSING CHOICE

A. OBTAINING HOUSING

1. Real Estate Practices

The primary methods of acquiring owner-occupied housing in Riverside County are purchases of existing homes through licensed real estate agents and purchases in new home developments. Some housing is also sold through auctions and directly from seller to buyer without a licensed real estate agent. Licensed real estate agents handle most resale housing purchases, although some new housing developers use local real estate agents rather than setting up their own sales offices. Licensed real estate agents also represent some buyers at auctions. New home developments usually establish a sales office on-site and employ their own licensed sales agents.

The California Bureau of Real Estate (CalBRE) licenses real estate agents as either real estate salespersons or real estate brokers. Real estate salespersons must successfully complete three college-level courses, which includes a course in Real Estate Principles and Real Estate Practice and pass a CalBRE-administered examination in order to become licensed. Salespersons renewing an original license must complete 45 clock hours of CalBRE-approved continuing education courses.

Fair housing is one of the topics mandated by CalBRE in the Real Estate Principles class; in addition, there is a fair housing continuing education requirement. Most real estate agents also join the California Association of Realtors® and are thus entitled to use the Realtor® designation. Real estate salespeople must work under the direction of a licensed real estate broker. Real estate brokers must take eight college-level courses covering various aspects of real estate and pass a broker exam administered by CalBRE, as well as additional continuing education courses for license renewal.

Real estate brokers and offices are generally members of a local board or association of realtors. The local board or association typically runs a Multiple Listing Service (MLS), which lists properties for sale. Properties can only be entered into the MLS by members, thus limiting participation to properties that have been listed for sale by a real estate broker, or by a salesperson under the direction of a broker. Most resale homes in Riverside County are sold through real estate offices, utilizing the MLS.

Most real estate agents work on a commission basis; typically, the commission is paid by the seller out of the proceeds of the sale. The buyer and seller may have the same agent (dual agency), or they may have separate agents. Due to this structure, the real estate agent typically works for the seller rather than the buyer. In new home developments, unless the builder is allowing broker participation, the agent is working for the seller and not the buyer. This is important to note, as the buyer's interests may not be fully protected in a dual agency transaction.

2. Sale and Rental of Housing

Housing for rent in Riverside County may be offered in one of several ways: through a property management company; through an on-site rental office; through a real estate office; or directly by the owner. In all cases, the person or firm offering the property for rent is working on behalf of the owner and representing the owner's interests, and not that of the prospective tenant.

In all situations where the property owner engages another party to offer the property for rent, the person or firm providing this service must be licensed by the Department of Real Estate as a property manager or real estate broker. As noted previously, the CalBRE's licensing process includes some education on fair housing issues. In cases where the owner is offering the property directly, the owner is not required to be licensed and may not be aware of fair housing requirements. Violations of fair housing practices may occur due to lack of awareness, misunderstanding, or the commission of intentional acts.

3. Fair Housing Audit Update

During the 2013/2014 fiscal year, The Fair Housing Council of Riverside County was contracted to conduct an audit to determine the existence of discriminatory practices in the sale and/or the housing rental markets within targeted county areas. Testing was conducted in the following cities: Coachella, Jurupa Valley, Lake Elsinore/Lakeland Village, San Jacinto, and Cabazon.

The primary purpose of the 2014 Fair Housing Audit, included in Appendix B in its entirety, was to detect possible discriminatory practices against Race, Disability, Familial Status, or National Origin. Four basic categories are utilized to determine any marked area of difference: (1) Availability, (2) Terms & Conditions, (3) Tenant Qualifications, and (4) Courtesy/Overall Contribution.

As a result of the audit, several new impediments were identified and as such, the 2009 Analysis of Impediments Matrix is being amended so that the Economic Development Agency (EDA) and Fair Housing Council of Riverside County address these impediments over the course of the next Consolidated Plan period.

4. Publicly Assisted Rental Housing

The Housing Authority of the County of Riverside (HACR) administers the Housing Choice Voucher Program (Section 8) for Riverside County and currently operates tenant based rental assistance programs serving low income, homeless, and veteran clients in eastern and western Riverside County. The HACR also currently administers 48 Project-Based Vouchers.

Courtesy Rental Listings are offered through GoSection8.com, which gives the family access to owners who wish to rent their properties to recipients of the program. Property owners, managers, and agents are given notice that they have a responsibility and a

requirement under the law not to discriminate in the advertising or rental of property on the basis of race, color, religion, sex, handicap, familial status, or national origin. The Housing Authority also conducts quarterly Owner Seminars where owners and landlords are given information regarding the Section 8 program. A packet is provided that includes Fair Housing information and a referral to the FHCRC for further information and assistance. The Fair Housing Council provides services to both landlord and tenants, and also hosts educational workshops on their rights and responsibilities under Fair Housing laws.

According to RealtyTrac®, in January 2014 the number of properties that received a foreclosure filing in Riverside County was 12% higher than the previous month and 11% lower than the same time last year. Although less common than in previous years, landlords with properties in pre-foreclosure status will reduce their rent to gain occupancy. However within a few months, families find themselves in jeopardy of losing their security deposits and having to relocate. The Housing Authority's efforts to run foreclosure activity reports prior to issuing an owner ID, have been successful in catching those already in the foreclosure process. Nevertheless, there have been some that have defaulted after Section 8 participants have moved into their properties. This has been especially difficult on the families that now have to be uprooted.

Another concern is landlords with higher end mortgages are unable to accommodate the Housing Authority payment standards and cannot lease out their properties to Section 8 participants. These owners typically are investors and as property values return, investor interest cools off. This may affect the number of properties available and affordable to Section 8 tenants.

5. Financing: Evaluation of Home Mortgage Disclosure Act Reports and CRA Ratings

The Home Mortgage Disclosure Act (HMDA) Reports and Community Reinvestment Act (CRA) Public Evaluations were evaluated for lenders operating in Riverside County, in order to assess local lending practices and identify obstacles in obtaining home loans.

EDA analyzed 2012 HMDA data for owner-occupied loans to determine existence of disparate lending practices based on race, and to identify the primary reasons given for denial of a loan. The findings of the analysis are shown in the following tables. Table III-1 provides information on loan origination and denial rates by type of loan while Table III-2 is regarding denial rates by race and ethnicity, and Table III-3 is concerning denial rates by income. Table III-4 provides reasons for denial of loans.

Table III-1

LOAN ORIGATION AND DENIAL RATES BY TYPE OF LOAN								
Type of Loan	Number Originated	Percent Originated	Number Approved But Not Accepted	% Approved But Not Accepted	Number Denied	Percent Denied	Number Closed, Withdrawn or Incomplete	% Closed/ Withdrawn/ Incomplete
FHA/FSA/RHS/ VA Purchase Loans	13,140	20.5	870	18.1	2,816	15.9	2,595	15.8
Conventional Purchase Loans	6,957	10.8	678	14.1	1,488	8.4	1,583	9.6
Refinance Loans - Owner Occupied	43,192	67.3	3,086	64.3	12,033	68.2	12,073	73.4
Home Improvement Loans - Owner Occupied	865	1.3	169	3.5	1,311	7.4	204	1.2
Total	64,154		4,803		17,648		16,455	
Source: 2012 HMDA Data								

As illustrated in Table III-2, White applicants had the highest loan origination rate at 29.2%, followed by Asian applicants (4.2%), Black applicants (2.6%), Joint White/Minority (1.3%), and Race Not Available (0.7%). Not Hispanic or Latino applicants had a loan origination rates of 38% while Hispanic or Latino applicants had rates of 15.5%. When the loan origination rate is shown relative to the percentage of applicants by race, White applicants and Not Hispanic or Latino were approved in higher proportions, and Black, Hispanic or Latino, and Race Not Available applicants were denied in higher proportions.

Table III-2

LOAN ORIGATION AND DENIAL RATES BY RACE AND ETHNICITY					
Race of Applicant	Loans Originated	Loan Origination Rate	Applications Denied	Loan Denial Rate	Withdrawn, Not Accepted, Closed or Incomplete Loans
American Indian/Alaskan Native	245	0.5%	55	0.4%	37
Asian	2,066	4.2%	627	4.2%	520
Black	1,269	2.6%	459	3.1%	409
Native Hawaiian/Other Pacific Islander	180	0.4%	53	0.4%	60
White	14,259	29.2%	3,868	25.8%	3,677
Two or More Minority Races	19	0.04%	6	0.04%	6
Joint (White/Minority Race)	628	1.3%	149	1%	132
Race Not Available	365	0.7%	132	0.9	153
Hispanic or Latino	7,570	15.5%	2,572	17.2%	2,157
Not Hispanic or Latino	18,548	38%	5,194	34.6%	4,856
Joint (Hispanic or Latino/Not Hispanic or Latino)	133	0.3%	35	26.3%	33
Ethnicity not Available	3,529	7.2%	1,841	12.3%	1,730
Total	48,811		14,991		13,770
Source: 20012 HMDA Data					

Table III-3

LOAN ORIGINATION AND DENIAL RATES BY INCOME						
Income of Applicant	Number of Originating Loans	Loan Origination Rate	Number of Loan Denials	Loan Denial Rate	Other*	Other*
Less than 50% of Median	617	1%	278	1.6%	196	1.2%
50-79% of Median	7,292	11.4%	2,552	14.5%	2,156	13.1%
80-99% of Median	9,760	15.2%	2,899	16.4%	2,564	15.6%
100%-119% of Median	9,652	15.1%	2,602	14.8%	2,485	15.1%
120% or More of Median	36,822	57.4%	9,299	52.7%	9,036	54.5%
Total	64,143		17,630		16,437	
Source: 2012 HMDA Data						
* The loans listed under "Other" were withdrawn, not accepted, closed or incomplete.						

Table III-4

REASONS FOR DENIAL OF LOANS																
Applicant Characteristic s	Actual Cases	Debt/ Income Ratio	Actual Cases	Empl. History	Actual Cases	Credit History	Actual Cases	Collateral	Actual Cases	Insuff. Cash	Actual Cases	Unverifiable Info	Actual Cases	Credit Appl. Incomple te/Mortga ge Insuranc e Denied	Number	Other
RACE		PERCENTAGE														
American Indian/Alaskan Native	4	13%	0	0%	12	39%	2	6%	0	0%	0	0%	5	16%	8	26%
Asian	138	27%	9	2%	88	17%	73	14%	11	2%	42	8%	64	13%	83	16%
Nat Hawaiian/Other Pacific Islander	8	20%	0	0%	11	28%	4	10%	2	5%	4	10%	2	5%	9	23%
Black	83	23%	2	1%	123	35%	42	12%	8	2%	16	5%	32	9%	49	14%
Hispanic	570	27%	38	2%	503	24%	234	11%	69	3%	152	7%	276	13%	295	14%
White	727	23%	24	1%	617	19%	599	19%	65	2%	180	6%	488	15%	520	16%
Joint (White/Other Race)	22	17%	2	2%	26	20%	26	20%	1	1%	10	8%	17	13%	26	20%
Race Not Available	30	28%	0	0%	20	19%	18	17%	2	2%	5	5%	14	13%	19	18%
INCOME		PERCENTAGE														
Less than 50% of Median	45	30%	3	2%	31	21%	24	16%	6	4%	10	7%	20	13%	11	7%
50-79% of Median	302	25%	16	1%	277	23%	178	14%	39	3%	64	5%	162	13%	193	16%
80-99% of Median	362	26%	15	1%	295	21%	225	16%	34	2%	77	5%	193	14%	211	15%
100-119% of Median	311	25%	11	1%	274	22%	180	14%	35	3%	81	7%	160	13%	192	15%
120% or More of Median	1,134	30%	40	1%	754	20%	508	13%	66	2%	212	6%	524	14%	538	14%
Income Not Available	5	31%	0	0%	3	19%	4	25%	2	13%	1	6%	1	6%	0	0%
Source: 2012 HMDA Data																

B. PUBLIC POLICIES AND ACTIONS

1. Background

The 2009 Fair Housing Impediments Study included review of public policy documents for fifteen CDBG Cooperating Cities. This Fair Housing Impediments Study is an update, and reviews public policy and documents related to goals, policies, and programs for the current 13 cooperating cities. The previous study looked at the resources that were available to provide affordable housing opportunities and reviewed any restrictions that would exclude the development of affordable housing. An Annual Planning Survey conducted in 2011 by the Governor's Office of Planning and Research (OPR) provides the latest information on local planning activities and the status of local General Plans.

This study examines the impact of the dissolution of Redevelopment that was the primary source of funds for affordable housing, explores other available resources that provides affordable housing opportunities, and reviews any restrictions that would impede the development of affordable housing. The County of Riverside conducted several Community Participation Meetings in selected unincorporated areas of the County and utilized a comprehensive on-line needs assessment survey to assist in the identification of community, housing, and social needs in the County's low- and moderate-income communities to determine the best way to address these needs. This study also reviews the housing, density, and infill of jurisdictions in the County of Riverside, whether specific areas were identified, and where they can be found (Housing Element, Land Use Element, and/or Zoning Code).

On June 28, 2011, Governor Brown signed Assembly Bill No. x1 26 ("ABX1 26"), the bill to dissolve redevelopment agencies throughout the State of California. On December 29, 2011, the California Supreme Court announced its decision to uphold ABX1 26, thus eliminating redevelopment agencies. As previously mentioned, the primary resources for affordable housing were redevelopment funds and the availability of land designated for residential development. The redevelopment agencies for the cities were successful in the production and preservation of affordable housing. Since the dissolution, cities have struggled to meet the need for affordable housing.

On January 10, 2012, all housing functions previously performed by the former Redevelopment Agency (RDA), including related rights, powers, duties, obligations, and housing assets were transferred to the Housing Authority of the County of Riverside. As Housing Successor, the Housing Authority is responsible for managing the wind down of redevelopment projects currently underway, make payments identified on the Enforceable & Recognized Obligation Payment Schedules (EOPS and ROPS), and dispose of redevelopment assets and properties as directed by the Oversight Board.

The Cooperating Cities are assisted through the County's First Time Homebuyer programs for the very low- and low-income families. Single-family rehabilitation or new construction projects continue to be funded through grants and loans. Developers are

assisted through the Riverside County Economic Development Agency for the creation of multi-family units and single family homes.

2. Zoning Ordinances

The potential for any significant impediment to fair housing was determined through an assessment of the public policies, programs, and zoning ordinances in relation to the community's uniqueness. The zoning ordinance for each jurisdiction was reviewed for restrictive and excessive development standards or governmental constraints that can be impediments to fair housing affecting affordable housing developments. The zoning ordinance complies with the amount of density and type of housing developed through the land use designations in the Land Use Element.

The housing programs of the various jurisdictions were reviewed along with zoning requirements and the cities' accomplishments regarding affordable housing. State law requires that the zoning ordinances must be consistent with the general plan. Although "restrictive and excessive development standards implemented through zoning ordinances" can be impediments to fair housing limiting the affordability and housing choice, there were a number of minor regulatory constraints to the further development of affordable housing that were observed:

a. Minimum Standards

- The County and cities set minimum floor space standards for multifamily and single family projects. For example, the City of Norco has included minimum multifamily floor standards from 750 square feet for an efficiency unit, to 1,000 square feet for a single-family dwelling that has two bedroom or less, and 1,300 square feet for all other single-family dwellings in a residential zone. The City of Blythe uses a broader standard in which an efficiency unit is 400 square feet where single family and/or multifamily projects can exist in any residential zone, except industrial or commercial.
- The City of Norco continues to indicate in their zoning ordinance an R-3 low-density designation with a maximum density for single family of 8 dwelling units per net acre requires a minimum of 600 square feet of open space to be allocated for each unit constructed. An additional two hundred (200) square feet of Usable Open Space is required for each bedroom over one in the dwelling unit.
- Desert Hot Springs requires that multifamily projects provide amenities such as a swimming pool, spa, tot lot with play equipment, or picnic shelter depending on the number of units within a multi-family project; however, these amenities, along with open space requirements, can add to the cost of discretionary items by the Planning Commission.
- The Cities of Banning, Beaumont, and Blythe have developed policies for congregate care and accessibility requirements for the physically disabled in the

general plan, but do not have specific regulations for the development of accessible units in their zoning ordinance. The Cities of La Quinta, Norco, and San Jacinto have restrictions for senior housing in their zoning ordinance.

- The City of Indian Wells' zoning ordinances does not discuss fair housing, nor are there any rules concerning the demolition of residential units.
- The City of Canyon Lake's zoning standards were last updated in 1996, however, standards may have changed. Currently, incentives for affordable housing seems to be lacking and does not seem to include or discuss density bonuses, inclusionary rules or fees, and fast tracking or streamlining procedures.

b. Density Bonus

Cities are required by the state to adopt a density bonus program for low-and-moderate developments, which restrict their units to very low, low or moderate-income households. Cities shall allow a density bonus of 25% over the underlying zoning designations. Multifamily complexes and senior units were developed granting density bonuses in which units were for handicapped residents. For example, the Planning Department for the County addressed the density program as a policy issue on a case-by-case basis through the R-6 (Residential Incentive) Zoning.

According to the survey, the city of Desert Hot Springs has adopted financial incentives to encourage lot consolidation for smaller infill parcels. Most other cities encourage lot consolidation by adopting Density Bonuses. Higher densities permit more intensive development of a parcel and allow the developer the opportunity to spread development costs over more units, thus increasing the availability of affordable housing.

c. Mobile Homes

Since the California Legislature has indicated a need to eliminate the differences between mobile home development and conventional forms of residential land use, and has enacted Section 65852.7 of the Government Code and amended Section 18300 of the Health and Safety Code to permit mobile home parks in residential zones, most cities allowed mobile home developments in other areas designated for residential zoning. The Cities of Banning, La Quinta, Murrieta, Norco, and Wildomar do not permit mobile home parks in other residential zones unless a conditional use permit is approved.

d. Fair Housing

The Cities of Beaumont, La Quinta, and Norco discuss fair housing issues in their zoning ordinance. Only the Cities of Canyon Lake and Desert Hot Springs do not reference fair housing issues in their zoning ordinances.

3. General Plans

The Governor's Office of Planning and Research has conducted the Annual Planning Survey for over 20 years and the 2011 results were published in the Annual Planning Survey Results 2012. The survey provides the latest information on local planning activities and the status of local General Plans. At the time of publication, the cities of Canyon Lake, Desert Hot Springs, and Lake Elsinore indicated that they were undergoing an update of one or more of General Plan Elements and were expecting to be completed by 2011. Banning, Coachella, Hemet, Indian Wells, and Perris expected to be completed with updating their General Plan in 2012, while Calimesa expected completion in 2014.

Jurisdictions within the County of Riverside that have identified specific areas for infill development were Beaumont, Calimesa, Corona, Desert Hot Springs, Hemet, Indio, Palm Springs, Perris, Riverside, San Jacinto, and Temecula. The cities identified these areas for infill development in their Housing Element, Land Use Element, and/or Zoning Code. The infill development in the cities of Indio and Temecula were identified in their Specific Plan. To promote or facilitate infill development, these jurisdictions have adopted the following types of policies and/or procedures: density, height, and other bonuses; expedited permit processing; infill and specific plan; and/or reduced parking requirements.

The cities of Banning, Beaumont, Blythe, Canyon Lake, Coachella, Corona, Desert Hot Springs, Hemet, Indio, Menifee, Moreno Valley, Murrieta, Palm Springs, Riverside, and San Jacinto adopted policies and/or programs that promote access to regular transit service connecting residential, employment, and commercial areas across their jurisdictions. These policies and programs are integrated in the jurisdiction's Circulation Element, Land Use Element, Transportation Plan, or other documents such as the Specific Plan. Developing affordable housing in proximity to existing transit routes can reduce transportation and housing costs for low-income families. It also reduces auto use and accompanying congestion and pollution.

4. Barriers

Within the territory of the County there are highly diversified areas that consist of high density urbanized areas and also lower density rural areas. However, the need for affordable housing remains at-large throughout the entire County. Within the vast areas of the County there are several barriers to the production of affordable housing. The 2011 Annual Planning Survey included information from jurisdictions explaining the primary barriers experienced to implementing infill projects.

a. Infrastructure

The need for affordable housing remains large in rural areas of the County. The rural areas employ a significant number of low-income households. However, the need to fulfill the affordable housing need in these areas is strongly hindered by the lack of infrastructure. Coachella and Moreno Valley reported infrastructure constraints as a primary barrier to implementing infill projects. The Coachella Valley Water District which is the main source of water supply in these areas completed a domestic water hydraulic modeling study which showed that in certain areas of the Eastern Coachella Valley the demand for housing exceeds the areas' water supply.

b. Lack of Funding

Coachella, Indio, Norco, and Palm Springs reported lack of funding as a barrier to infill housing. At the time of the survey, all proposed projects in Norco needed a reduction of fees or other forms of financial assistance from the City which they were not in a position to do. Coachella specifically indicated the cost of development and lack of future tenants in the narrative answers.

c. Dissolution of Redevelopment Agencies

The City of Norco, which is persistent in preserving its historical animal keeping and small plot agriculture zoning, is reaching build-out condition in its residential zones. There is little land available for the construction of new units in any substantial numbers. The City had been using its redevelopment funds, and various state and federal funds, to preserve existing housing stock at price levels affordable to very low and low-income households. Coachella has also indicated the loss of redevelopment tools as a barrier to implementing infill projects. Since the dissolution of the Redevelopment Agencies, cities struggle to meet the need for affordable housing.

d. Personnel

Although Lack of Staff Resources was included as a barrier in the Survey, no jurisdictions in the County of Riverside reported it as having been experienced.

5. Housing Programs

All cooperating cities, utilize the County's housing programs.

6. Evaluations of Housing Element Goals and Policies -Observations

The following observations can be made in relation to the issues of affordable housing:

a. Regular Density Analysis

- Density is a critical factor in the development of affordable housing. Affordable housing tends to be developed at the highest density range. In the current

economic state where funds have diminished maintaining lower costs to the development of affordable housing is critical. Overall, maintaining higher density lowers the per unit land cost.

- Several cities have large land areas that are needed for substantial residential growth in which there are a wide range of housing types and densities. For instance, in the County's R-HD zoning designation (Residential High Density), more multifamily projects can be built in comparison to a low-density residential zoning for single family homes. The R-HD zoning designation then becomes an impediment to the development of affordable single family housing. The end result is that fewer affordable single family homes will be built.
- Since the need for affordable housing is recognized as a significant housing problem in the County of Riverside, the County has established the R-6 zone as a residential incentive that allows flexibility in the density based on the physical and service constraints in the area. In the past the County has utilized R-6 zoning on two projects and is currently reevaluating the process to increase its effectiveness.

b. Special Needs Policy/Program

The Comprehensive Housing Affordability Strategy (CHAS) data, based on the 2006 – 2010 ACS, was developed by the U.S. Census Bureau for HUD. The County of Riverside's Housing Needs were determined by analyzing the housing problems by income levels, levels of cost burdened, severe housing problem and households with special needs. The data used was derived from the CHAS.

Necessary assistance for the special needs populations, such as disabled and senior households, was identified based on the CHAS tables as well as the number of senior citizens on the HACR's waiting list for Section 8 or Public Housing. In the past, the cities received assistance through the County's Economic Development Agency, which provided CDBG funds for an Enhanced Senior Home Repair Program. RDA and CDBG funds were provided for the Home Rehabilitation Program available for qualifying residents in the unincorporated areas or within the Cooperating Cities' limits. Redevelopment was the primary source of funds for affordable housing for many cities and the County.

The CHAS data analyzes households with one or more housing problems, such as overcrowding, lacking adequate housing facilities (kitchen or plumbing), and those experiencing cost burden, which is paying more than 30% of household income for housing.

In the past, cities typically allocated their set-aside funds from the Redevelopment Agencies for programs to meet State-mandated affordable housing needs and to expand housing opportunities. Agencies such as the County of Riverside Community Action Partnership (CAP) and other non-profit organizations still offer some type of home repair assistance. CAP administers the Weatherization Program that helps

low-income households make their homes more energy efficient. Funding is provided by federal LIHEAP and the Department of Energy.

7. Bond Financing

Bond financed projects with affordability restrictions have a limitation on the number of years the affordability restrictions can remain in place. Early pay off of the project financing can be a potential impediment and have a significant impact on the availability of affordable housing within the community. Cities have tried to implement affordability restrictions with the longest feasible time. Potential investors interested in purchasing existing low-income housing developments and/or developers exploring the fiscal attributes of building low-income housing are often deterred by long-term affordability restrictions. They see these restrictions as a bad investment in that it limits their ability to sell or modify the housing units over the long term.

8. Taxation

Potential factors that pose a constraint on affordable housing and create a potential impediment to fair housing along with property taxes are utility users taxes. In conjunction with high property taxes, which increase monthly payments and make monthly payments unaffordable and prevent very low and low income homeowners from purchasing a home or maintaining an apartment, taxes on utilities is a minor constraint; however, it is a potential impediment to affordable housing. Out of the 13 cooperating cities surveyed, only three cities have imposed a utility tax. The City of Desert Hot Springs imposes a 7% utility tax while the Cities of Beaumont and Indio have a utility tax of 3%. In November 2008, the City of Indio Utility Users Tax, Measure K resulted in a yes vote to extend the tax to include additional utilities, particularly communication technologies such as T-lines. According to their 2013 Budgetary Analysis Report, the City of Desert Hot Springs is considering modernizing and expanding the utility users tax to cover utilities not currently included. The County, in an effort to reduce any restraints for affordable housing, attempts to keep taxes in the unincorporated areas to a minimum and does not have a tax on utilities.

C. HOUSING PROGRAM ADMINISTRATIVE POLICIES

1. Housing Authority

The Housing Authority of the County of Riverside is subject to Title VII of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act 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.

All documents related to Nondiscrimination in Housing have been approved and comply with the requirements by HUD and therefore are not considered an impediment to fair housing.

2. Community Development Block Grant (CDBG)/Home Investment Partnerships (HOME) Programs

a. CDBG Program Contract Format

The “Sponsor’s Agreement” for the Use of Community Development Block Grant Funds was submitted by EDA in the previous study, was approved, and is in compliance with all laws and regulations.

The contract utilized for Cooperating Cities is called a “Supplemental Agreement for the Use of Community Development Block Grant Funds.” This agreement was addressed in the previous study, approved, and is in compliance with federal requirements for nondiscrimination.

b. HOME Program Contract Format

The County continues to use HOME agreements which specify the responsibilities of applicants pertaining to fair housing law.

3. Complying Programs/Non-Impediments

The following items were omitted in this study since the documents and agreements have been approved by HUD and are not considered impediments:

a. Emergency Solutions Grant Program

Contract Format for the Use of Emergency Solutions Grant Funds: All recipients must consult with the Continuum(s) of Care operating within the jurisdiction in determining how to allocate ESG funds. Riverside County may sub grant ESG funds to private nonprofit organizations. The recipient and its sub recipients must document their compliance with the nondiscrimination and equal opportunity requirements.

b. Fair Housing Outreach: CDBG Grantee and Service Recipients

FHCRC has an extensive outreach program that includes, but is not limited to, educational workshops, technical training programs, and general public awareness activities. Aside from providing technical assistance to the general public, FHCRC is called upon to train the real estate and lending industry, and governmental agencies on fair housing practices.

Public Awareness. FHCRC’s mission is to educate the public of their services and issues regarding fair housing laws. Not only is this accomplished through the print-media/web-site/public television and radio, but through direct visibility within the community – community meetings, activities, non-profit events, and holding a seat on different commissions and boards throughout the County. Their tireless efforts have included, but not been limited to, the following:

- Home Buyer Seminars were held throughout the County to equip home buyer customers with the necessary skills needed to purchase a home.
- Keep Your Home California foreclosure prevention programs to provide assistance to homeowners undergoing a documented, eligible hardship.
- Participation in the HUD Mobile Home Park Review Committee meetings to address major owner/tenant issues.
- FHCRC's staff, display, and marketing materials (English/Spanish) are found wherever a community/city is holding an event.

Technical Training Programs. FHCRC conducts comprehensive Fair Housing Training Workshops for real estate, mortgage lending and insurance industries, non-profits, and government agencies. Topics covered are: State and Federal Fair Housing Laws, Discriminatory Policies and Practices, Non-Discriminatory Advertising, and Servicing Seniors and the Disabled.

Educational Workshops. Workshops are an integral part of all public education activities provided by FHCRC. Through the Council's experience, they have discovered this provides the presenter and the participant an opportunity to learn about specifics, ask questions, and meet one-on-one for personal assistance. FHCRC generally incorporates this into their activity venue.

D. SUMMARY OF IMPEDIMENTS TO FAIR HOUSING

1. Background

It is the goal of the County of Riverside to eliminate any existing and (to the maximum extent possible) prevent future housing discrimination and other impediments to equal housing opportunity within the unincorporated County as well as in all 13 CDBG Cooperating Cities. To help make this objective a reality, the County has contracted with FHCRC to provide fair housing services to the unincorporated portion of the County and the Cooperating Cities.

FHCRC is a nonprofit corporation that maintains offices in the Cities of Riverside, Corona, Moreno Valley, and Palm Springs. It provides services to the County and the aforementioned cooperating cities through the following activities: education and outreach (workshops, seminars, and presentations) relating to fair housing laws; training, technical assistance, and testing, such as the testing conducted for and described in this report, to ensure compliance with fair housing laws; processing of housing discrimination complaints; resolution of landlord/tenant disputes; and ensuring that the rights of those who are victims of housing discrimination are enforced through the California State Department of Fair Employment and Housing and/or the U.S. Department of Housing and Urban Development.

a. Financial Plan

Fair housing services are provided by FHCRC to the County and the Cooperating Cities through a contract that is subject to renewal on a yearly basis. The County contracts for the provision of all services required for compliance with all federal and state programs and laws affecting fair housing in the unincorporated County as well as the 13 CDBG cooperating cities. Fair housing services are paid for through the CDBG program.

FHCRC's most recent contract with the County (for Fiscal Year 2013/2014) is in the amount of \$129,716. While the exact amount of funding available for future fair housing services cannot be predicted in advance, the County will continue to provide for such services to the greatest extent that it is financially possible.

b. Future Updates

It is anticipated that any future revisions of the 2014 Fair Housing Impediments Study will continue to follow the time frame of the County's Consolidated Plan (a five year strategic plan). Thus a major update of data contained in the Study could be expected in the year 2018, when the next Consolidated Plan is scheduled for preparation. However, changes in actions to eliminate current impediments and prevent future impediments to fair housing should be implemented, as needed, on a yearly basis. Such changes should be based on the results of testing and other program strategies and objectives assigned to and accomplished by FHCRC. Changes in strategies and/or program objectives should be incorporated into the renewal of FHCRC's contract at the beginning of each year.

2. Summary of Impediments

Illegal discrimination is not always overt and can be empirically difficult to prove. The mere filing of a complaint alleging housing discrimination neither proves nor disproves the allegation. However, when large numbers of the same types of complaints are received over a measured period of time, and by more than one agency, it is reasonable to conclude that a problem exists.

As can be seen from the data in this report, housing discrimination complaints based on disability and race are the basis for most complaints. An analysis of Home Mortgage Disclosure Act (HMDA) reports also indicated the existence of differential treatment in the availability of mortgage financing based on race.

Furthermore, disparate treatment of testers based on race was found in a number of instances in the rental and sale of, as well as in the financing of, housing. The results of the 2013 Rental, Sales, and Lending Audit Analysis coincides with and lends support to the aforementioned assertion that the consistently high numbers of complaints filed with FHCRC and HUD, based on race, may be indicators of a housing discrimination problem, even though each complaint ultimately must be validated on its own merits.

In short, an evaluation of data contained in this report suggests that housing discrimination persists countywide, in subtle and not so subtle forms, particularly in the categories of disability, race and family status, as well as in the mortgage lending industry. The following is a summary of issues discussed in the Audit Analysis that could be considered significant impediments to fair housing countywide.

a. Affordable Housing

The recent economic crisis has contributed to the increasing need for additional affordable rental housing. As individual income decreased due to the economy, so did the ability to afford decent housing. One of the biggest problems facing low-income individuals is the gap between what they can afford to pay for housing and the actual cost of that housing. Based on the current fair market rent for rental properties and the fact that 43.3% of household earn less than \$50,000 per year, the affordability of rental housing is a major issue in Riverside County.

b. Lack of Available Housing

For very low-income and extremely low-income renters, the market for affordable housing is the worst in 25 years. One of the main causes of this situation is the overall inadequate pool of housing available. According to an annual report by the National Low Income Housing Coalition (NLIHC), titled *Out of Reach*, for every 100 extremely low-income renters in California, only 38 affordable units exist. Housing shortages increase the probability of housing discrimination by creating competition that can be used to disguise unlawful discrimination practices.

c. Disabilities

Impediments to Fair Housing for Individuals with disabilities are finding housing that meets their specific criteria, having full use and enjoyment of their current dwelling, and housing discrimination. Thankfully, privately owned and publicly assisted housing must meet the accessibility requirements of the Fair Housing Act. Still, only buildings of four or more units built after March 13, 1991 are subject to these requirements.

d. Advertising

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

e. Viewing the Unit

One of the most common discrimination a potential renter may encounter is when viewing the unit. Housing providers may make a judgment based on one’s race, disability, familial status or other characteristic when determining qualifications. In

some cases, potential renters are quoted different terms and conditions than other potential renters because of the housing provider's discriminatory actions.

f. Credit Check

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

g. Leasing Issues

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

In a lucrative housing market, one potential impediment to Fair Housing is that some housing providers favor shorter lease terms like month-to-month leases. It allows the housing provider to forego a waiting period to increase rents and sometimes increasing rent is a way to push out tenants that they consider undesirable.

Lastly, the security deposit can also serve as an impediment. To deter what a landlord perceives as less desirable tenants, the landlord may ask for a deposit higher than for others.

h. Steering

When Caucasian purchasers are discouraged from neighborhoods of color, while African American purchasers are steered toward those same neighborhoods, there is a clear violation of the Federal Fair Housing Act. Sometimes real estate agents steer by limiting the location of homes they show buyers. In other cases, real estate agents steer by making comments and editorializing about communities and neighborhoods. This type of activity by those working in the real estate industry presents a clear impediment to fair housing choice.

i. Habitability

The California Supreme Court has recognized that every residential lease carries with it an implied warranty of habitability. California Civil Code §1942 gives a tenant

two options if the premises are uninhabitable: repair the problems and deduct the cost from the rent, or move out. This creates a situation where although the remedies of “repair and deduct” or “move out” are great on paper, yet in practice they are too risky for tenants to truly benefit from them. This creates an impediment to Fair Housing because tenants then come to accept the substandard living conditions as unavoidable. Low income families are often the most impacted by substandard living conditions, which makes the need to address this impediment to Fair Housing all the more important.

j. Constructive Evictions

Another impediment to Fair Housing that is related to habitability is the constructive eviction. A constructive eviction occurs when a landlord takes actions that interfere with the tenant's use and enjoyment of the premises in a significant way. Some of the tactics that landlords engage in that may result in a constructive eviction are cutting off the tenant's utilities or other essential services; harassing the tenant, whether verbally, physically, or emotionally; or blocking the tenant's access to the unit, such as changing the locks. Actions behind a constructive eviction are an attempt by the landlord to remove a lawful tenant without going through the proper unlawful detainer process.

k. Predatory Lending

Predatory lending occurs when a variety of characteristics are present during the lending process or in the final mortgage loan itself. These characteristics include targeting specific groups for mortgage loans, unreasonable loan terms, and fraudulent behavior by the lender. Given the financial dangers associated with subprime loans, prepayments penalties, excessive fees, exaggerated incomes and abusively high rates, it is clear that discrimination found in the subprime market constitutes a grave threat to the financial well-being of America's already underserved populations. The Department of Housing and Urban Development (HUD) has noticed that homeowners in high-income African-American neighborhoods are 6 times more likely to have a subprime loan compared to homeowners in a high-income Caucasian neighborhood.

Product steering is another form of predatory lending that occurs when the borrower will be offered a variety of loan options, but they will be persuaded to take the higher cost loan. This was often seen when lenders steered potential borrowers towards FHA loans, even though they could have qualified for a conventional loan. There are benefits to an FHA loan but statistics have shown that even with these benefits, an FHA loan will cost the borrower more money over the life of a loan than a conventional loan would.

l. Other Lending / Sales Concerns

Other impediments to Fair Housing in the lending and sales market that do not involve predatory lending are differential treatment of minorities or low-income

individuals in the lending process and real estate agents refusal to deal with transactions for properties valued less than \$100,000 or so. These are yet additional hurdles for low-income individuals and are impediments to Fair Housing that needs to be addressed.

SECTION IV RECOMMENDATIONS

A. CONCLUSIONS AND RECOMMENDATIONS

The following paragraphs present conclusions regarding the extent of impediments to fair housing choice within Riverside County, along with recommendations for mitigating these impediments. The information presented herein is by no means comprehensive, and there undoubtedly remain a number of additional remedies to the problems faced by home seekers.

Based on the impediment revealed in the FHCRC Audit, the following recommendations are suggested for Riverside County to continue the alleviation of impediments to fair housing:

- Audits should be conducted periodically to determine the nature, extent, and changes to housing discrimination throughout Riverside County. These audits should be focused on all of the protected classes under California law.
- Specific audits should be conducted on the new interpretations of the Unruh Act, which now covers gender identity and gender expression under the protected class of sex. Individuals who fall into these categories deserve the full protection of the law, but it is likely that many housing providers are discriminating on these protected bases.
- Further audits should also be conducted on the basis of disability. The topic of service and companion animals is still confusing for many housing providers, who continue to tell individuals that they cannot have a service or companion animal because of a “no pets” policy. This is blatantly discriminatory under Fair Housing laws, and further education and outreach is also needed to inform housing providers of the applicable law.
- In an effort to ensure that all potential renters are treated the same, owners of rental property should be encouraged to provide written documentation to all applicants. This documentation should include a listing of all available housing and also include standardized information on the terms and conditions of the rental process, such as income qualifications, down payments, and other fees or expenses.
- Provide workshops to the general public on the topics of budgeting and credit issues. This will increase the general public’s financial education and improve their living conditions. This also may help to boost the overall economy, as it is beneficial for the county when more individuals and families are in a stronger financial situation.

- Provide local non-profit organizations with support to market their services, as these services are critical to the sustained success of the community. If individuals have more awareness regarding the free services made available by local non-profits, they are more likely to take advantage of those services. In turn, when these free services are taken advantage of, it will benefit those individuals directly and also will benefit the community as a whole.
- In order to help all individuals understand and respect the diversity of cultures in Riverside County, more education, training, and outreach on Fair Housing laws and cultural sensitivity should be provided to tenants, managers, owners, and apartment owner associations.
- Develop and expand an educational program for housing providers, community organizations, and the general public regarding housing discrimination, Fair Housing laws, and the options available for individuals who have been the victims of discrimination.
- Continue homebuyer educational programs and ongoing education for participants in First- Time Homebuyer Programs, such as the program that FHCRC offers to the public.

B. ANALYSIS OF IMPEDIMENTS MATRIX

Identified Impediments	Actions to Eliminate Identified Impediments	Primary Responsibility	Partners	Time-Table	Status
Affordable Housing	Alleviate governmental constraints which add to the cost of housing and developer costs.	Economic Development Agency (EDA)	Fair Housing Counsel of Riverside County, Inc. (FHCRC)	Ongoing	
	Reduce the cost of housing to the consumer, be it rental or single-family homes, through the elimination of unnecessary governmental actions, policies and regulations.	EDA	FHCRC	Ongoing	
Lack of Available Housing	Increase the number of Agency funded affordable single and multifamily housing projects.	EDA	FHCRC	Ongoing	
Disabilities	Provide education and outreach to housing providers through seminars or community workshops increasing education regarding current law on discrimination against the disabled.	Fair Housing Counsel of Riverside County, Inc. (FHCRC)	EDA	Ongoing	
	Expand or explore the type of disability discrimination prevalent in certain communities and target the outreach appropriately. Future audits could include wheelchair testers and other protected class groups such as persons with AIDS and mentally ill persons.	FHCRC	EDA	Ongoing	
	Work in cooperation with and support the efforts of non-profit community service providers that assist disabled persons in locating suitable housing through information, referrals, and community education.	EDA	FHCRC	Ongoing	
	Provide education and outreach to housing providers through seminars or community workshops in educating the current law on discrimination against the disabled.	FHCRC	EDA	Ongoing	
Advertising/Viewing the Unit	Rental property owners, managers, and realtors should be encouraged to provide written documentation to all applicants which include the listings of all available housing, standard information on the terms and conditions of the application process, posting Fair Housing informational signs and providing Fair Housing literature.	FHCRC	EDA	Ongoing	
Credit Check/Leasing Issues	Encourage rental property owners, managers, and realtors to provide written documentation to all applicants that includes the listings of all available housing, standard information on the terms and conditions of the application process, such as income qualifications, down payments, and other fees and expenses, posting Fair Housing informational signs and providing Fair Housing literature	FHCRC	EDA	Ongoing	
Predatory Lending/Steering	Continue to provide homebuyer education, credit counseling, and fair housing counseling and awareness training to the first-time home buyers and homeowners, particularly low-income and very low-income applicants.	FHCRC	EDA	Ongoing	
Habitability/Constructive Evictions	Continue to develop, expand, and provide more education and outreach to housing providers, community organizations, and the general public regarding housing discrimination, fair housing laws, and services provided by the Fair Housing Council	FHCRC	EDA	Ongoing	
Other Lending/Sales Concerns	Contract with the Fair Housing Council of Riverside County, Inc., to conduct audit testing.	EDA	FHCRC	Ongoing	
	Continue to develop, expand, and provide more education and outreach to housing providers, community organizations, and the general public requesting housing discrimination, fair housing laws, and services provided by the Fair Housing Council.	FHCRC	EDA	Ongoing	
	Continue homebuyer education programs and ongoing education for participants in the first time homebuyer program that the Fair Housing Council offers.	FHCRC	EDA	Ongoing	

SECTION V APPENDICES

A. Glossary of Terms

California Association of Realtors

A statewide organization of realtors formed to serve its membership in developing and promoting programs and services that will enhance the members' freedom and ability to conduct their individual businesses successfully with integrity and competency, and through collective action, to promote the preservation of real property rights.

California Consumer Price Index

An index measuring the prices at various times of a selected group of goods and services, which typify those bought by ordinary Californian households. It allows comparisons of the relative cost of living over time, and is used as a measure of inflation.

California Redevelopment Law

Section 33000 of the California Health and Safety Code assisting local jurisdictions to eliminate blight from a designated area, as well as to achieve the goals of development, reconstruction and rehabilitation of residential, commercial, industrial and retail districts.

CDBG Community Development Block Grant

A program operated by the United States Department of Housing and Urban Development. The program is codified under 24 CFR Part 570. The program provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.

CHAS Comprehensive Housing Affordability Strategy

A plan formerly required of CDBG grantees until 1994. HUD commissioned a special tabulation of 1990 census data to provide CDBG grantees with useful housing data to help them complete the plan. In 1995, many grantees used this data again for their first Consolidated Plan. The current HUD requirement is a Consolidated Plan in lieu of a CHAS.

Civil Rights Act of 1964

Federal legislation to enforce the constitutional right to vote, to confer jurisdiction upon the district courts of the United States to provide injunctive relief against discrimination in public accommodations, to authorize the Attorney General to institute suits to protect constitutional rights in public facilities and public education, to extend the Commission on Civil Rights, to prevent discrimination in federally assisted programs, to establish a Commission on Equal Employment Opportunity, and for other purposes.

Civil Rights Act of 1968

Federal legislation, which includes within it the Federal Fair Housing Act.

Comprehensive General Plan

A planning document required by section 65300 of the California State Government Code. The document sets forth plans for zoning, transportation, housing development and land use.

Cooperating City

A city within the County of Riverside, which has signed a Three Year Cooperation Agreement and is actively participating with the County of Riverside to provide services,

programs and projects eligible under the Housing and Urban Development's Community Planning and Development's grant funding sources.

Covenant Agreement

An agreement, required by the California Redevelopment Law for the use of Low Income Housing Set Aside Funds, imposing affordability requirements on any assisted housing unit.

Community Planning and Development (CPD)

A division of the United States Department of Housing and Urban Development seeking to develop viable communities by promoting integrated approaches that provide decent housing, a suitable living environment, and expand economic opportunities for low and moderate income persons. The primary means toward this end is the development of partnerships among all levels of government and the private sector, including for-profit and non-profit organizations. The CPD office is responsible for the operation of the HOME Investment Partnership Act, Community Development Block Grant, and Emergency Shelter Grant programs and funds.

CRA Community Reinvestment Act

A federal statute enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 563e intended to encourage depository institutions to help meet the credit needs of the communities in which they operate.

Debt Income Ratio

The ratio given by dividing the monthly debt by the monthly income.

Department of Mental Health

A department of the County of Riverside established to provide effective, efficient, and culturally sensitive community-based services to severely mentally disabled adults and older adults, children at risk of mental disability, substance abusers, and individuals on conservatorship that enable them to achieve and maintain their optimal level of healthy personal and social functioning.

DFEH Department of Fair Employment and Housing

A department of the State of California with a mission to protect the people of California from unlawful discrimination in employment, housing and public accommodations, and from the perpetration of acts of hates violence.

DRE Department of Real Estate

A department of the State of California with a mission to protect the public in real estate transactions and provide related services to the real estate industry.

EDA Economic Development Agency

A department of the County of Riverside charged with the management and operation of programs under HUD's Community Planning and Development.

Executive Order 11063

A 1962 order by President John F. Kennedy enforcing equal opportunity in housing and preventing discrimination.

Fair Housing Act

Federal legislation first enacted in 1968 and expanded by amendments in 1974 and 1988 providing HUD with investigation and enforcement responsibilities for fair housing practices and prohibiting discrimination in housing and lending based on race, color, religion, sex, national origin, handicap, or familial status.

Fair Housing Choice

The ability of persons of similar income to have available to them the same housing choices without regard to race, color, religion, sex, disabilities, familial status, or national origin.

FHA Federal Housing Administration

A department of the federal government established by the National Housing Act of 1934, administered by the Assistant Secretary for Housing, who is responsible for the Department's various mortgage insurance programs promoting homeownership through government guaranteed mortgages.

FHCRC Fair Housing Council of Riverside County

A non-profit organization providing 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, marital status, or other arbitrary factors.

FSA Farm Services Agency

Formerly known as the Farmers Home Administration (FmHA). This agency of the United States Department of Agriculture ensures the well-being of American agriculture, the environment and the American public through efficient and equitable administration of farm commodity programs; farm ownership, operating and emergency loans; conservation and environmental programs; emergency and disaster assistance; domestic and international food assistance and international export credit programs.

HCD Housing and Community Development

An agency of the State of California and one of thirteen (13) departments within the Business, Transportation and Housing Agency. As California's principal housing agency, the mission of HCD is to provide leadership, policies and programs to expand and preserve safe and affordable housing opportunities and promote strong communities for all Californians.

HMDA Home Mortgage Disclosure Act

A federal statute enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C requiring lending institutions to report public loan data.

Housing Authority of the County of Riverside

A public agency chartered by the State of California to administer the development, rehabilitation or financing of affordable housing programs with a mission to provide affordable decent, safe and sanitary housing opportunities to low and moderate income families including elderly and disabled persons, while supporting programs to foster economic self-sufficiency.

Housing Element

A required component of the Comprehensive General Plan, which plans for the appropriate level of growth in housing stock for the local jurisdiction.

HRP Home Repair Program

A program operated by the Economic Development Agency offering grants to low-income homeowners to make health and safety oriented repairs to their homes.

HUD Housing and Urban Development

A branch of the federal government created by the Department of Housing and Urban Development Act of 1965 with a mission to increase homeownership, support community development and increase access to affordable housing free from discrimination.

Land Use Ordinance 348

An ordinance of the County of Riverside providing for land use planning and zoning regulations and related functions.

Low Income

Income that does not exceed 80 percent of area median income.

Low Income Housing Set Aside Fund

A requirement of the California Redevelopment Law to reserve twenty percent (20%) of all funds generated by a redevelopment agency and make them available as contribution toward the provision of housing affordable to low income persons.

Low Poverty Area

A census tract where less than a ten percent (10%) incidence of household poverty exists.

MFI Median Family Income

Also referred to as Area Median Income and Area Median Family Income.

An income of a family or household size found, by the United States Census Board, to be the average income for that family or household size within local and specified geographic boundaries.

MLS Multiple Listing Service

A marketing organization composed of member brokers who agree to share their listing agreements with one another in the hope of procuring ready, willing and able buyers for their properties more quickly than they could on their own.

Moderate Income

Income that does not exceed 120 percent of area median income.

Planning Commission

A public body of the County of Riverside assembled to review proposed land uses to ensure conformity with the Comprehensive General Plan.

Rehabilitation Act of 1973

Federal legislation, enacted in September 1973, prohibiting federally subsidized facilities from discriminating against persons with disabilities.

RHS Rural Housing Service

An agency of the United States Department of Agriculture with a mission is to improve the quality of life in rural areas by providing funding for single family homes, apartments for low-income persons or the elderly, housing for farm laborers, childcare centers, fire and police stations, hospitals, libraries, nursing homes and schools.

SHR Senior Home Repair

A program operated by the Economic Development Agency offering grants to very low-income senior or disabled homeowners to make health and safety oriented repairs to their homes.

Section 8 Housing Choice Voucher Program

Project and tenant based rental assistance via housing assistance payments authorized by the Housing and Community Development Act of 1974.

Sponsor Agreement

An agreement between the County of Riverside and a non-public sub grantee for the use of HUD Community Planning and Development funds.

Sub Grantees

An entity or person receiving assistance from the County of Riverside of funds granted by HUD.

Supplement Agreement

An agreement between the County of Riverside and a public sub grantee for the use of HUD Community Planning and Development funds.

VA Veterans Administration

A federal agency, which coordinates and consolidates all federal program providing benefits to veterans and operates the VA Loan Guarantee and Mortgage Insurance program providing home mortgage guarantees authorized by the Serviceman's Readjustment Act.

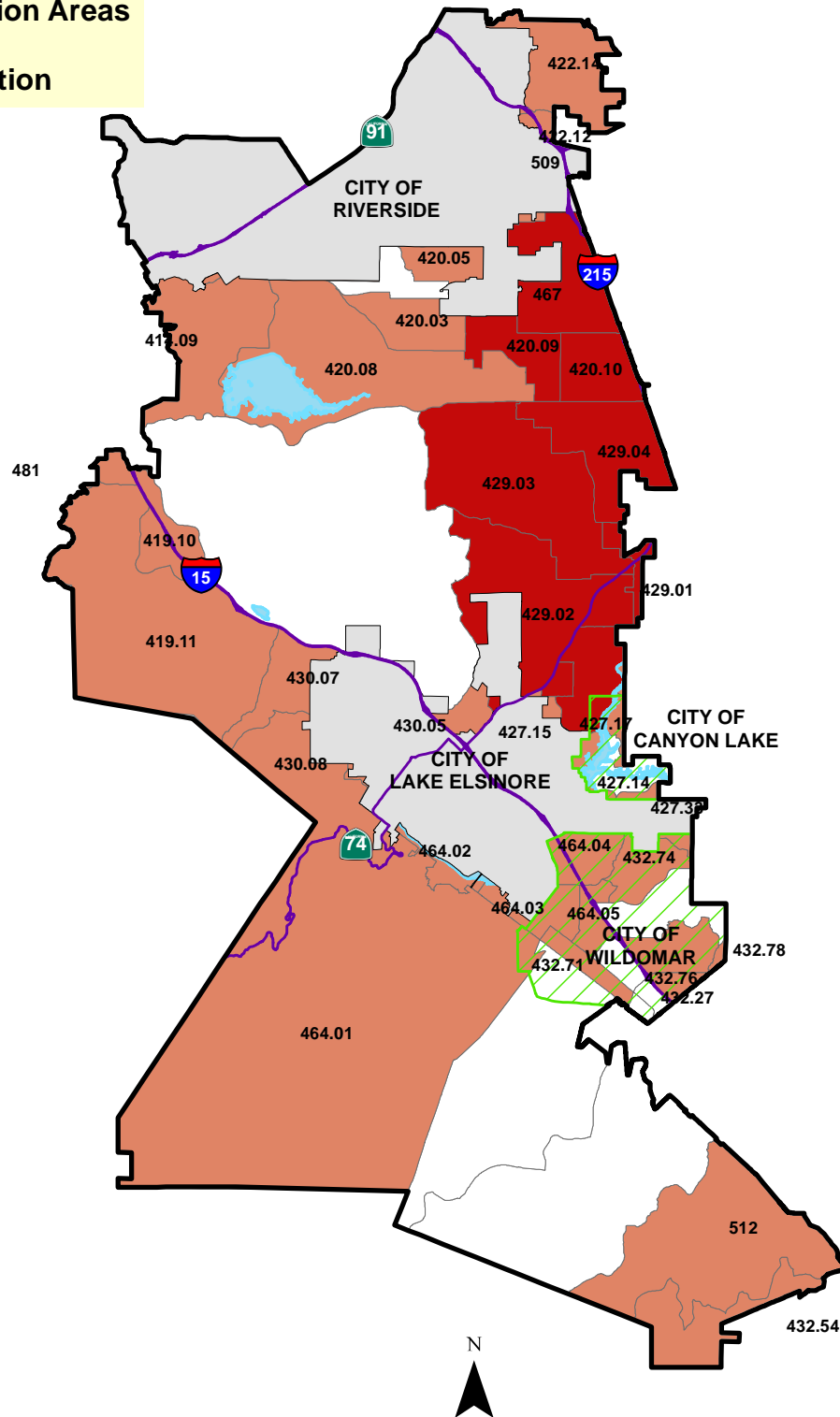
Very Low Income

Income that does not exceed 50 percent of area median income.

Appendix B
Fair Housing Audit Analysis

Appendix C
County of Riverside Ethnic Concentrations Map

**Race/Ethnic Minority Concentration Areas
Supervisorial District 1
Riverside Urban County Jurisdiction**



Legend

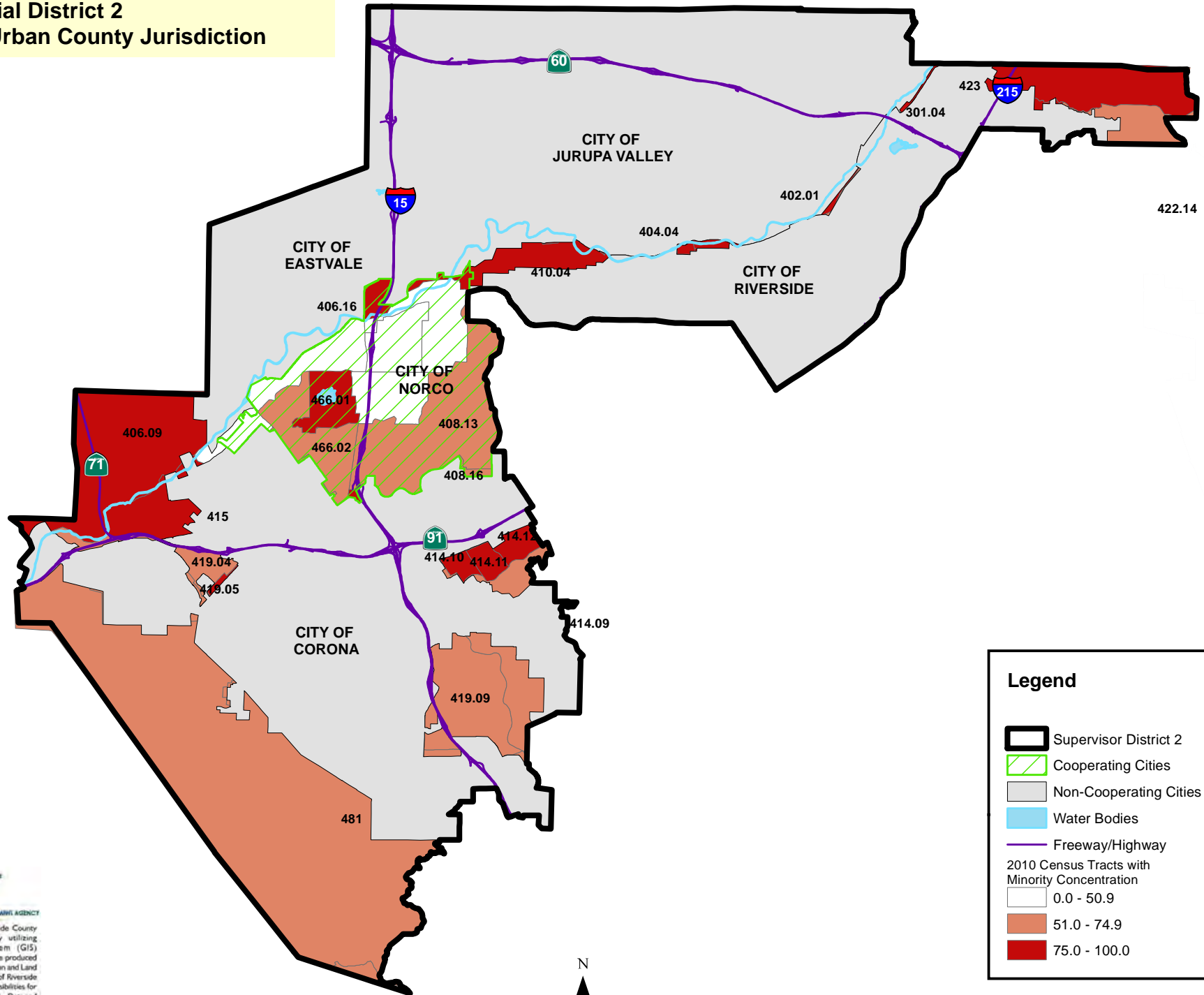
- Supervisor District 1
- Cooperating Cities
- Non-Cooperating Cities
- Water Bodies
- Freeway/Highway
- 2010 Census Tracts with Minority Concentration**
 - 0-50.9
 - 51.0-74.9
 - 75.0-100.0



This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TUMA and other sources should be queried for the most current information.

Source: 2008-2012 American Community Survey

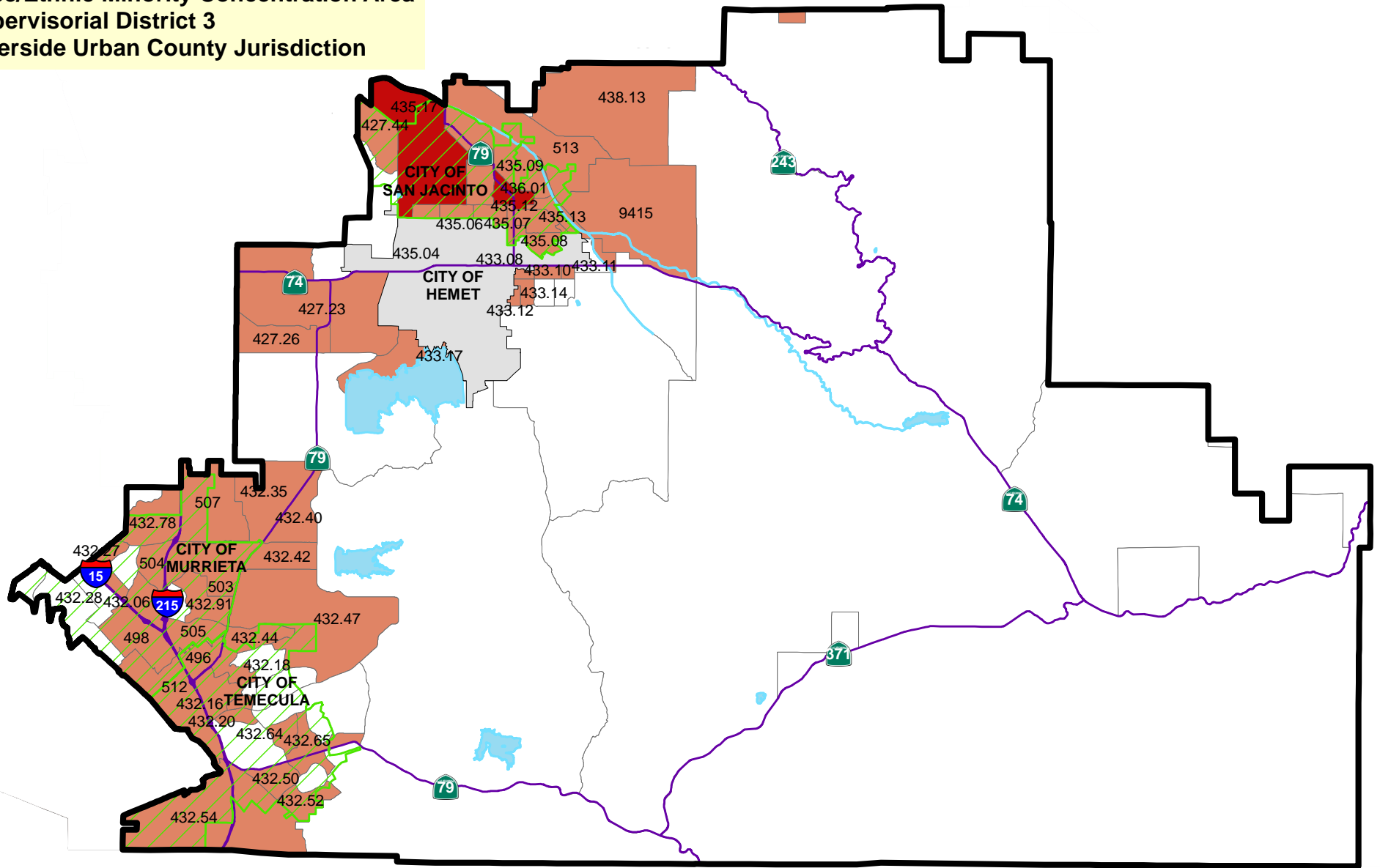
**Race/Ethnic Minority Concentration Areas
Supervisorial District 2
Riverside Urban County Jurisdiction**



This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TUMA and other sources should be queried for the most current information.



**Race/Ethnic Minority Concentration Area
Supervisorial District 3
Riverside Urban County Jurisdiction**



This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information represented on this map. Data and information represented on this map is subject to update and modification. TUMA and other sources should be queried for the most current information.



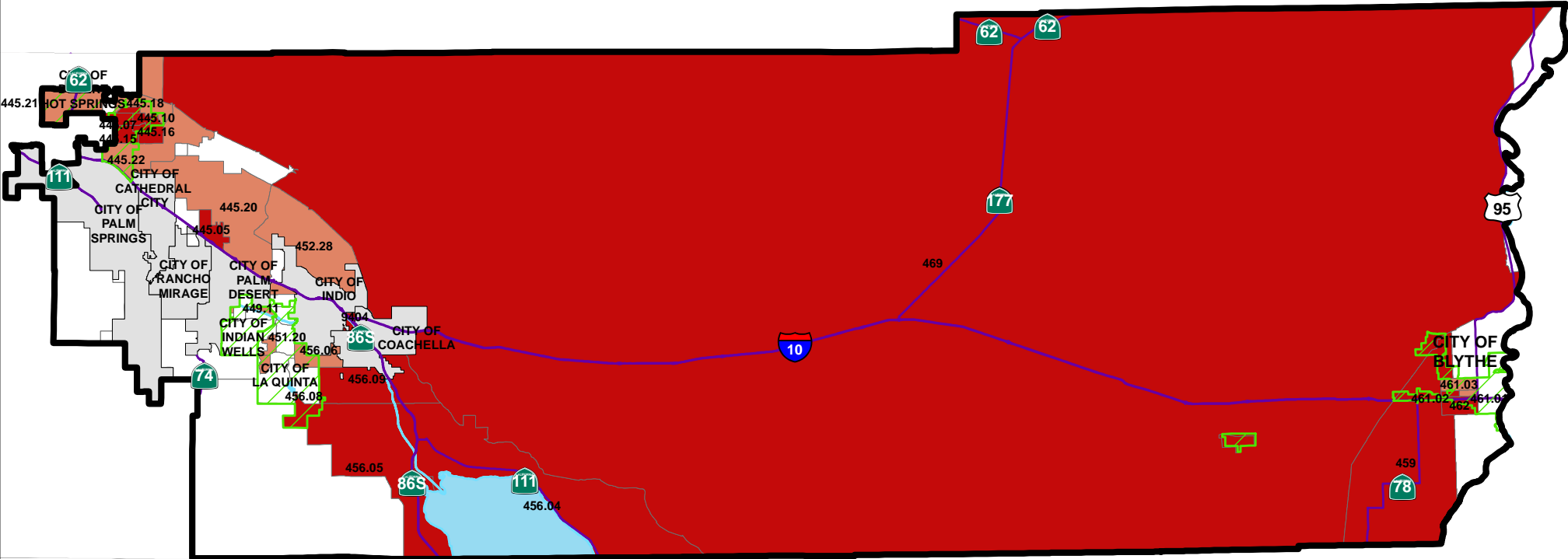
Source: 2008-2012 American Community Survey

Legend

- | | |
|------------------------|------------|
| Supervisor District 3 | 0.0-50.9 |
| Cooperating Cities | 51.0-74.9 |
| Non-Cooperating Cities | 75.0-100.0 |
| Water Bodies | |
| Freeway/Highway | |

2010 Census Tracts with
Minority Concentration

Race/Ethnic Minority Concentration Areas
Supervisory District 4
Riverside Urban County Jurisdiction



This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TMA and other sources should be queried for the most current information.



Source: 2008-2012 American Community Survey

Legend

Supervisor District 4

Cooperating Cities

Non-Cooperating Cities

Water Bodies

Freeway/Highway

2010 Census Tracts with Minority Concentration

0-50.9

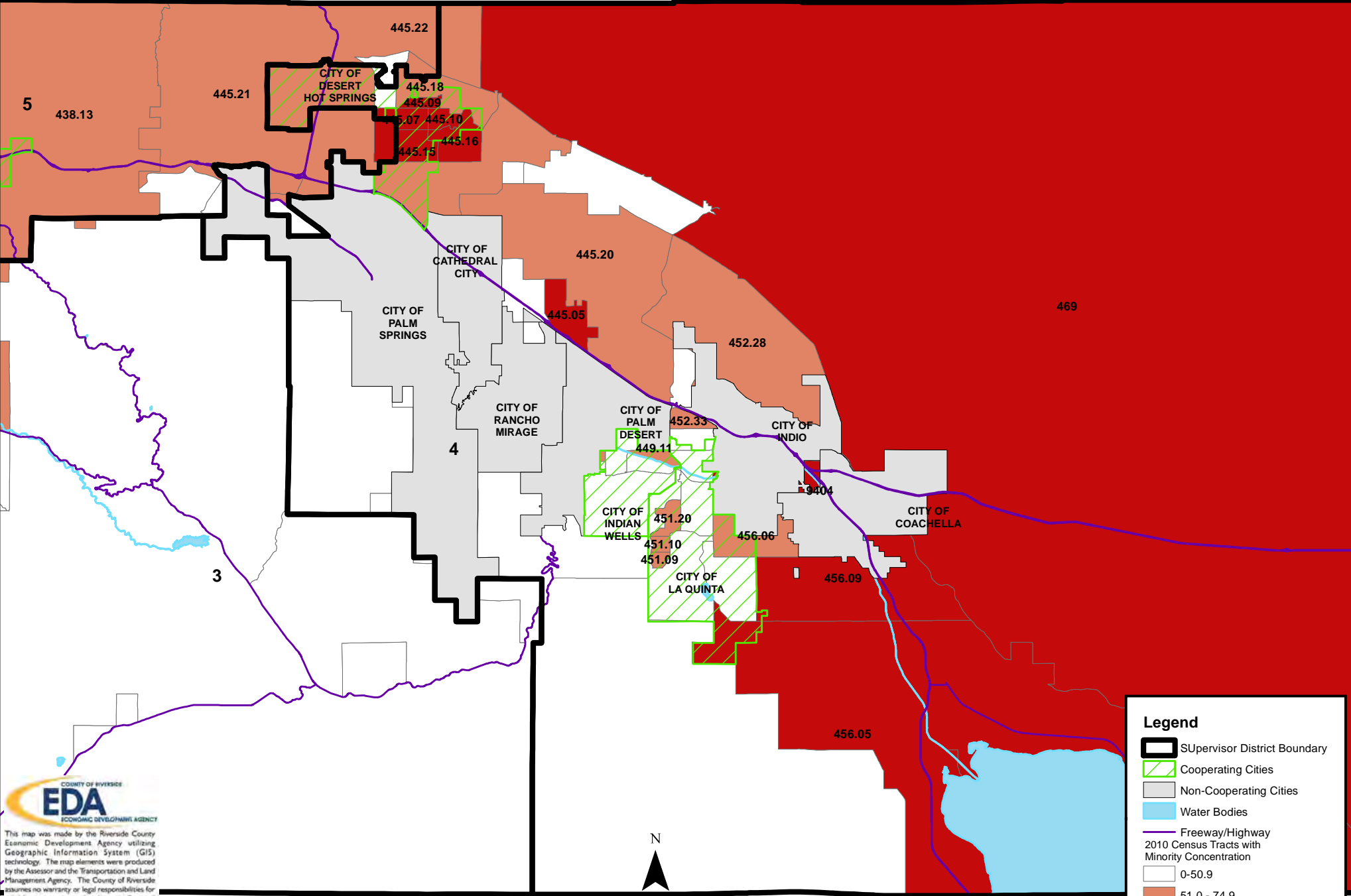
51.0 - 74.9

75.0 - 100.0

Legend

- Supervisor District 4
- Cooperating Cities
- Non-Cooperating Cities
- Water Bodies
- Freeway/Highway
- 2010 Census Tracts with Minority Concentration
- 0-50.9
- 51.0 - 74.9
- 75.0 - 100.0

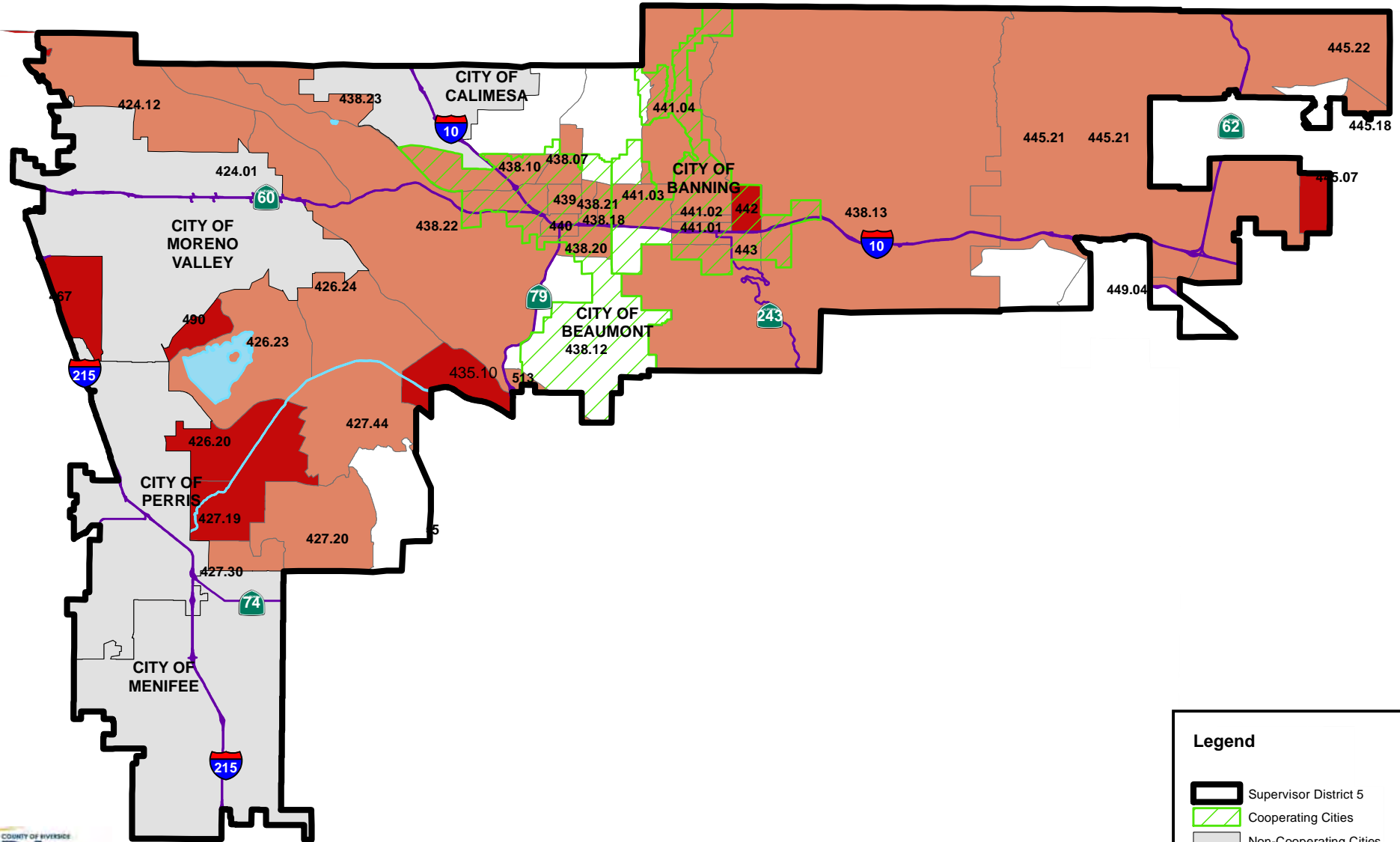
Race/Ethnic Minority Concentration Areas
Coachella Valley
Riverside Urban County Jurisdiction



COUNTY OF RIVERSIDE
EDA
ECONOMIC DEVELOPMENT AGENCY

This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TLMA and other sources should be queried for the most current information.

**Race/Ethnic Minority Concentration Areas
Supervisorial District 5
Riverside Urban County Jurisdiction**



This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TUMA and other sources should be queried for the most current information.



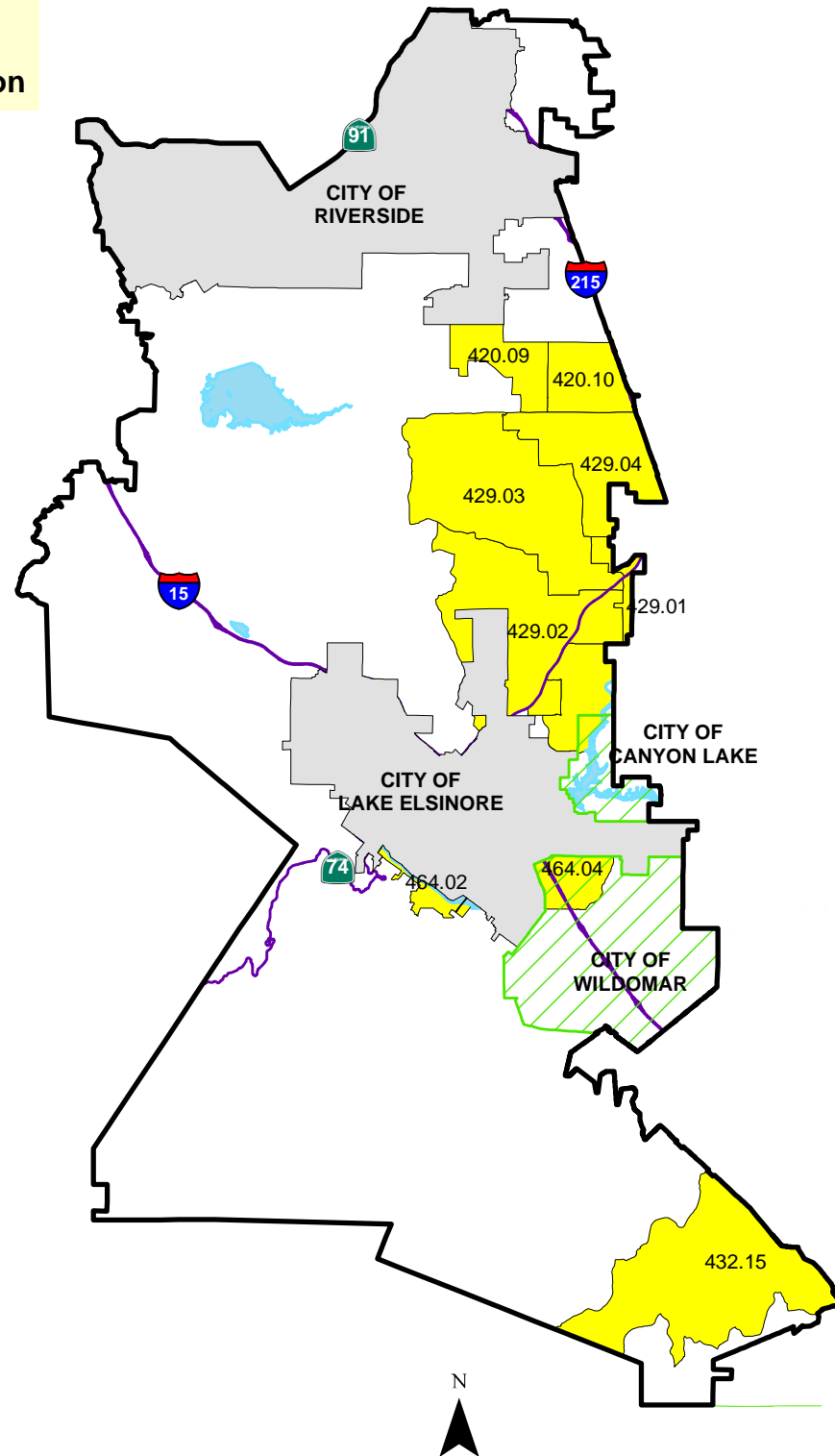
Source: 2008-2012 American Community Survey

Legend

- Supervisor District 5
- Cooperating Cities
- Non-Cooperating Cities
- Water Bodies
- Freeway/Highway
- 2010 Census Tracts with Minority Concentration**
 - 0.0-50.9
 - 51.0-74.9
 - 75.0-100.0

Appendix D
County of Riverside Low/Moderate Income Areas

**Low and Moderate Income Areas
Supervisorial District 1
Riverside Urban County Jurisdiction**



Legend

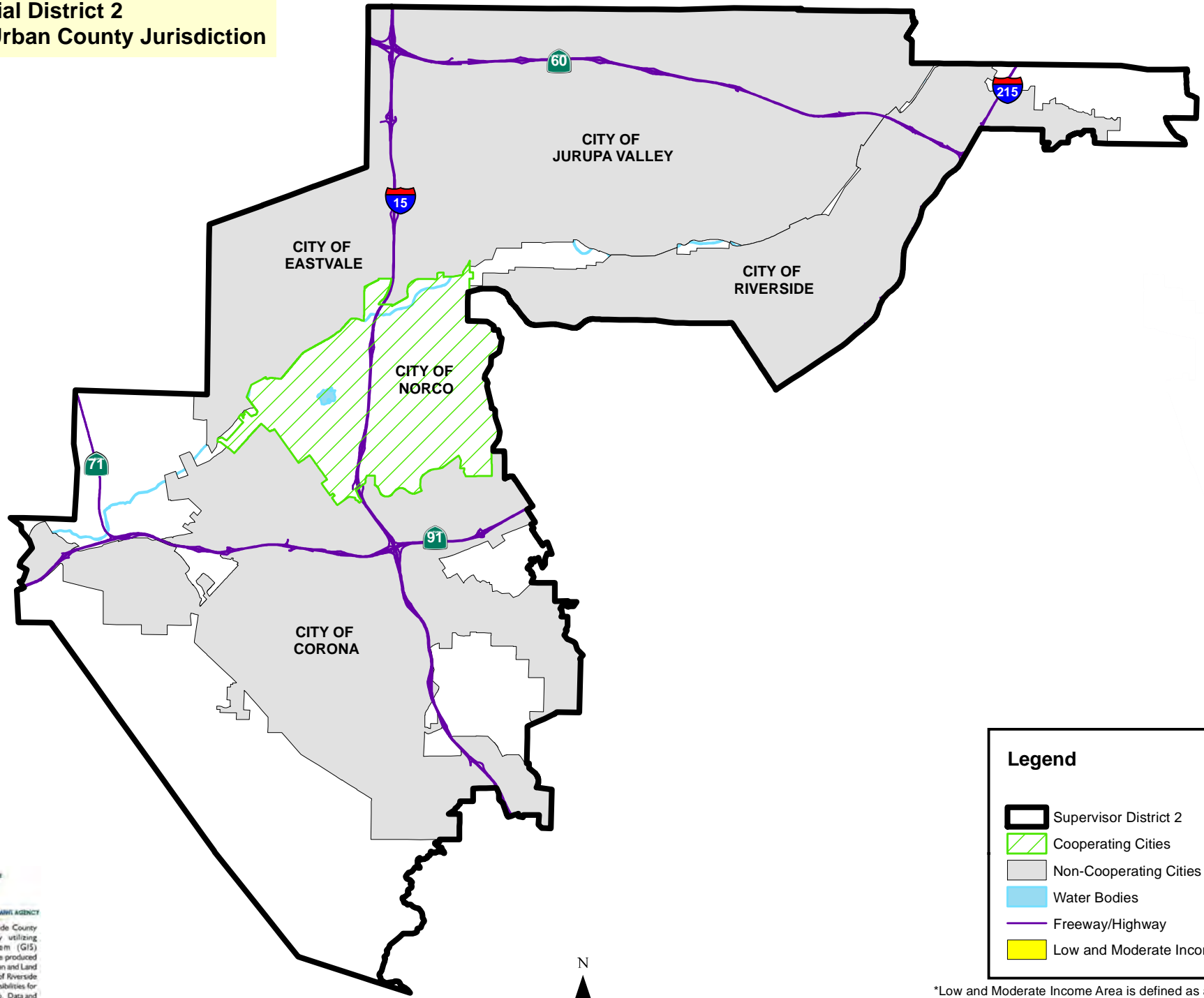
- Supervisor District 1
- Cooperating Cities
- Non-Cooperating Cities
- Low and Moderate Income Areas*
- Water Bodies
- Freeway/Highway



This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TLMA and other sources should be queried for the most current information.

*Low and Moderate Income Area is defined as a census tract with 51% or more low and moderate income population.
Source: 2000 Census, HUD Low and moderate Income Summary Data, FY13.

**Low and Moderate Income Areas
Supervisor District 2
Riverside Urban County Jurisdiction**

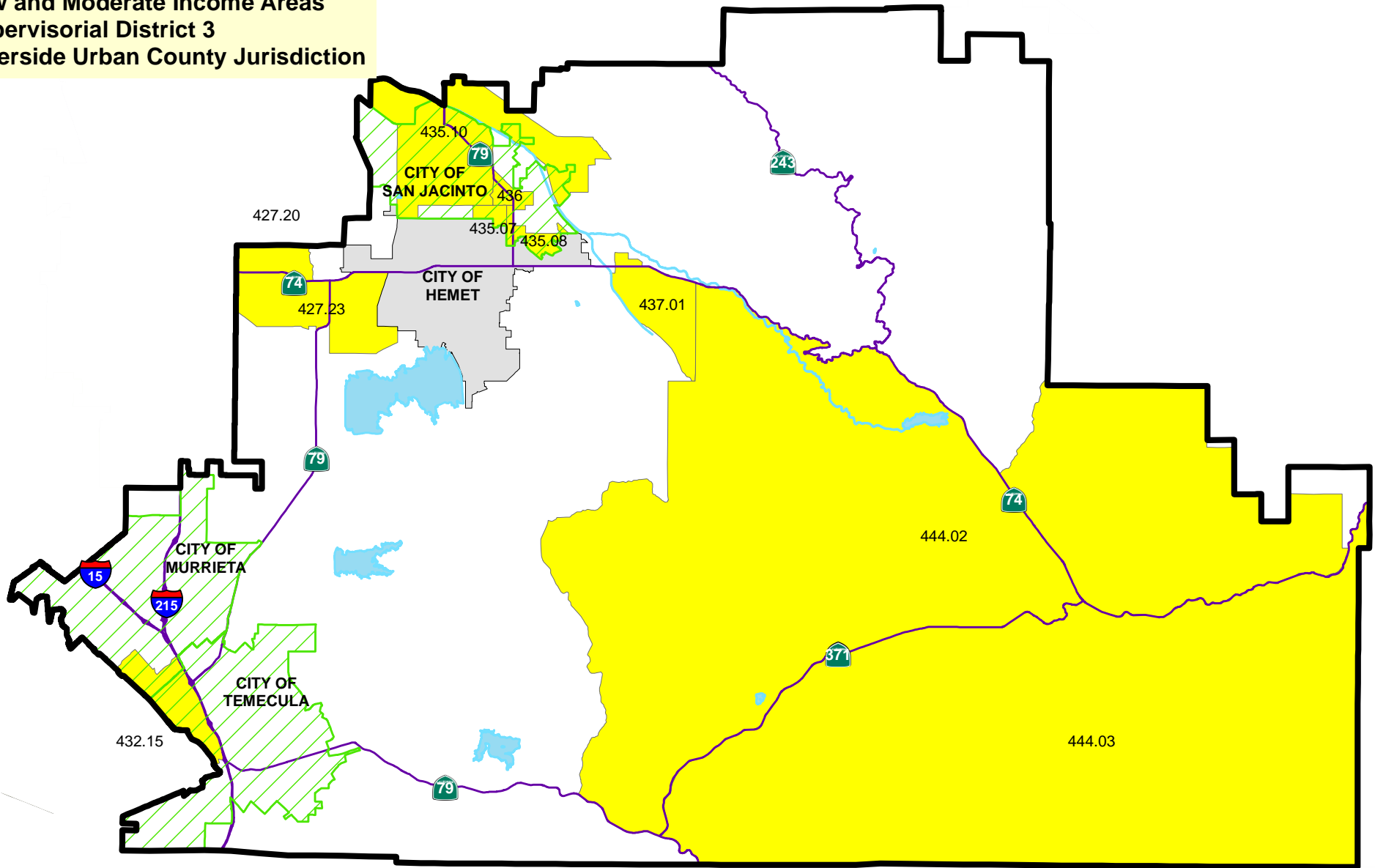


This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TUMA and other sources should be queried for the most current information.

For District 2 noLow to Moderate Income Areas in County or Cooperating City Jurisdiction

*Low and Moderate Income Area is defined as a census tract with 51% or more low and moderate income population.
Source: 2000 Census, HUD Low and moderate Income Summary Data, FY13.

**Low and Moderate Income Areas
Supervisorial District 3
Riverside Urban County Jurisdiction**



This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TUMA and other sources should be queried for the most current information.

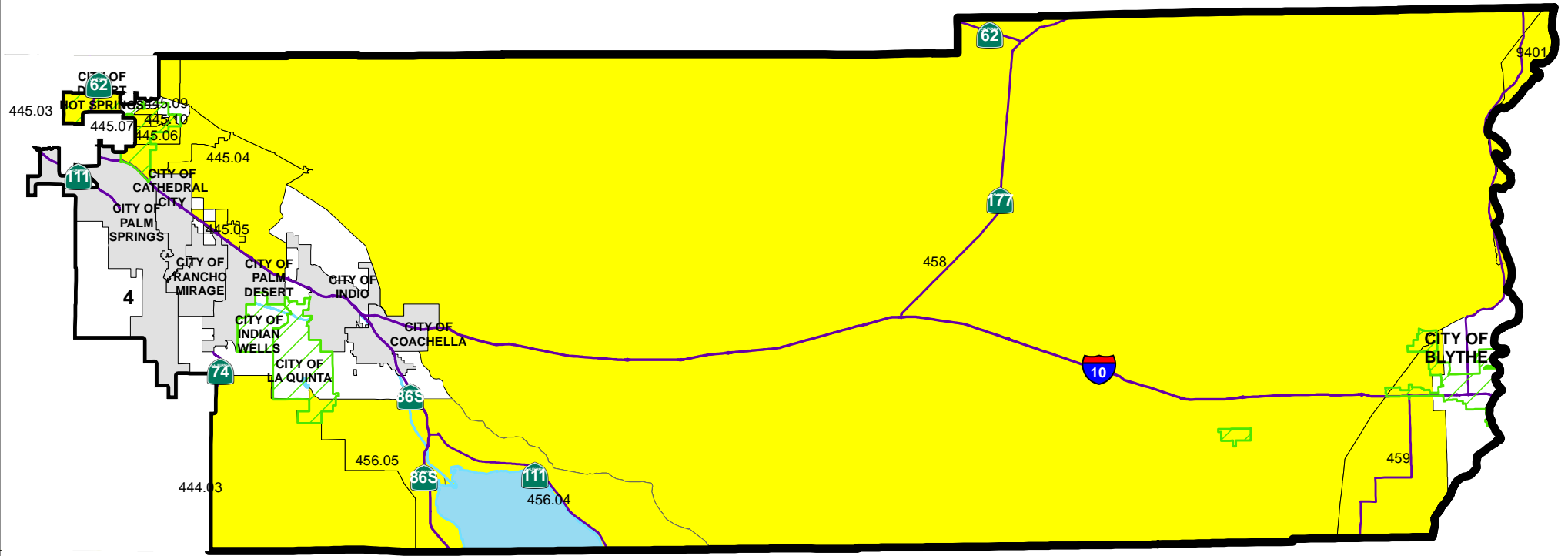


*Low and Moderate Income Area is defined as a census tract with 51% or more low and moderate income population.
Source: 2000 Census, HUD Low and moderate Income Summary Data, FY13.

Legend

- Supervisor District 3
- Cooperating Cities
- Water Bodies
- Non-Cooperating Cities
- Low and Moderate Income area
- Freeway/Highway

Low and Moderate Income Areas
 Fourth Supervisorial District
 Riverside Urban County Jurisdiction




CITY OF RIVERSIDE
EDA
 ECONOMIC DEVELOPMENT AGENCY


This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TLMA and other sources should be queried for the most current information.


*Low and Moderate Income Area is defined as a census tract with 51% or more low and moderate income population.
 Source: 2000 Census, HUD Low and moderate Income Summary Data, FY13.


Legend


SUPERVISORIAL_DISTRICTS


 Supervisor District 4

 Cooperating Cities

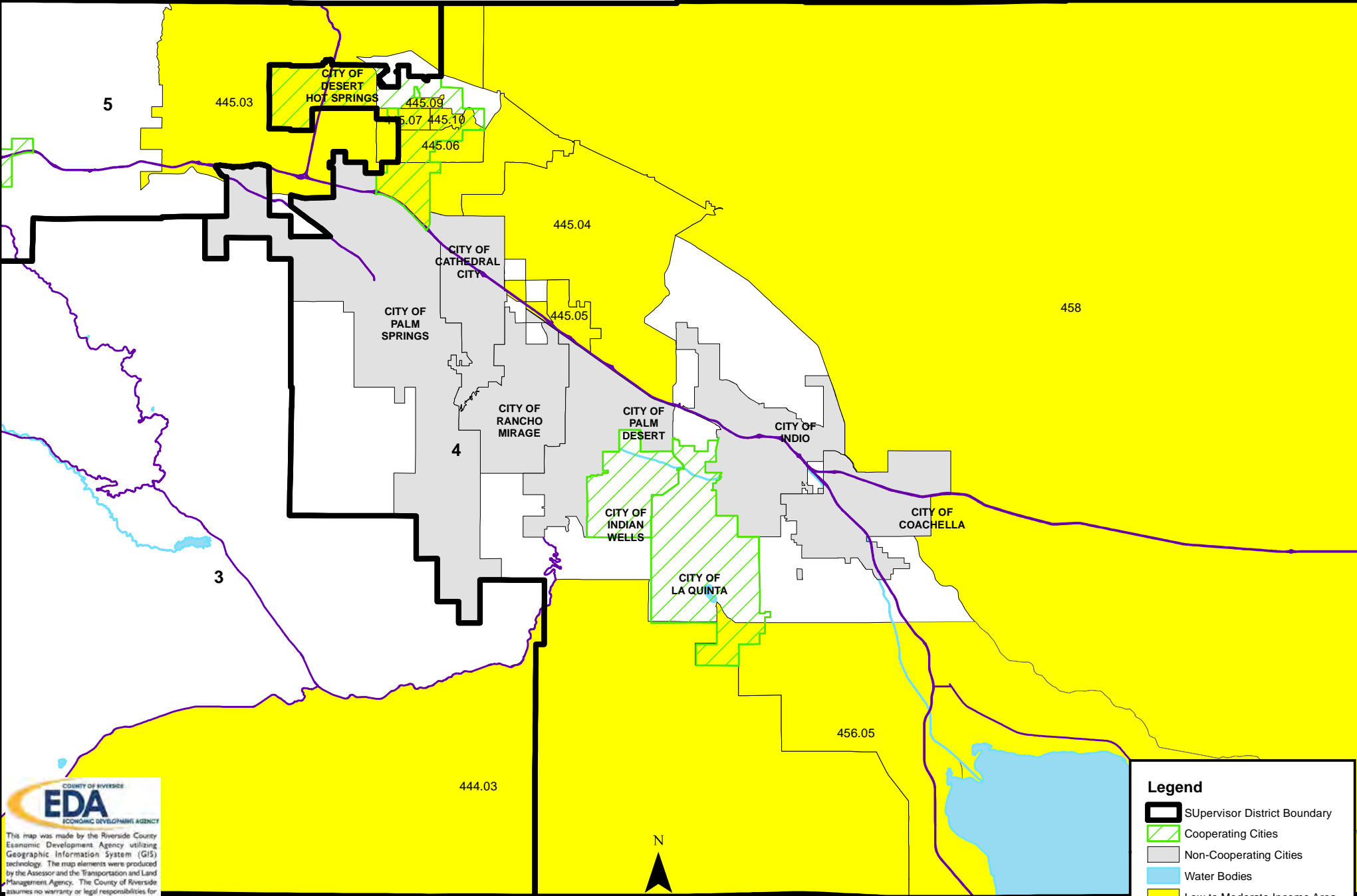
 Freeway/Highway

 Non-Cooperating Cities

 Water Bodies

 Low to Moderate Income Area

Low and Moderate Income Areas
Coachella Valley
Riverside Urban County Jurisdiction

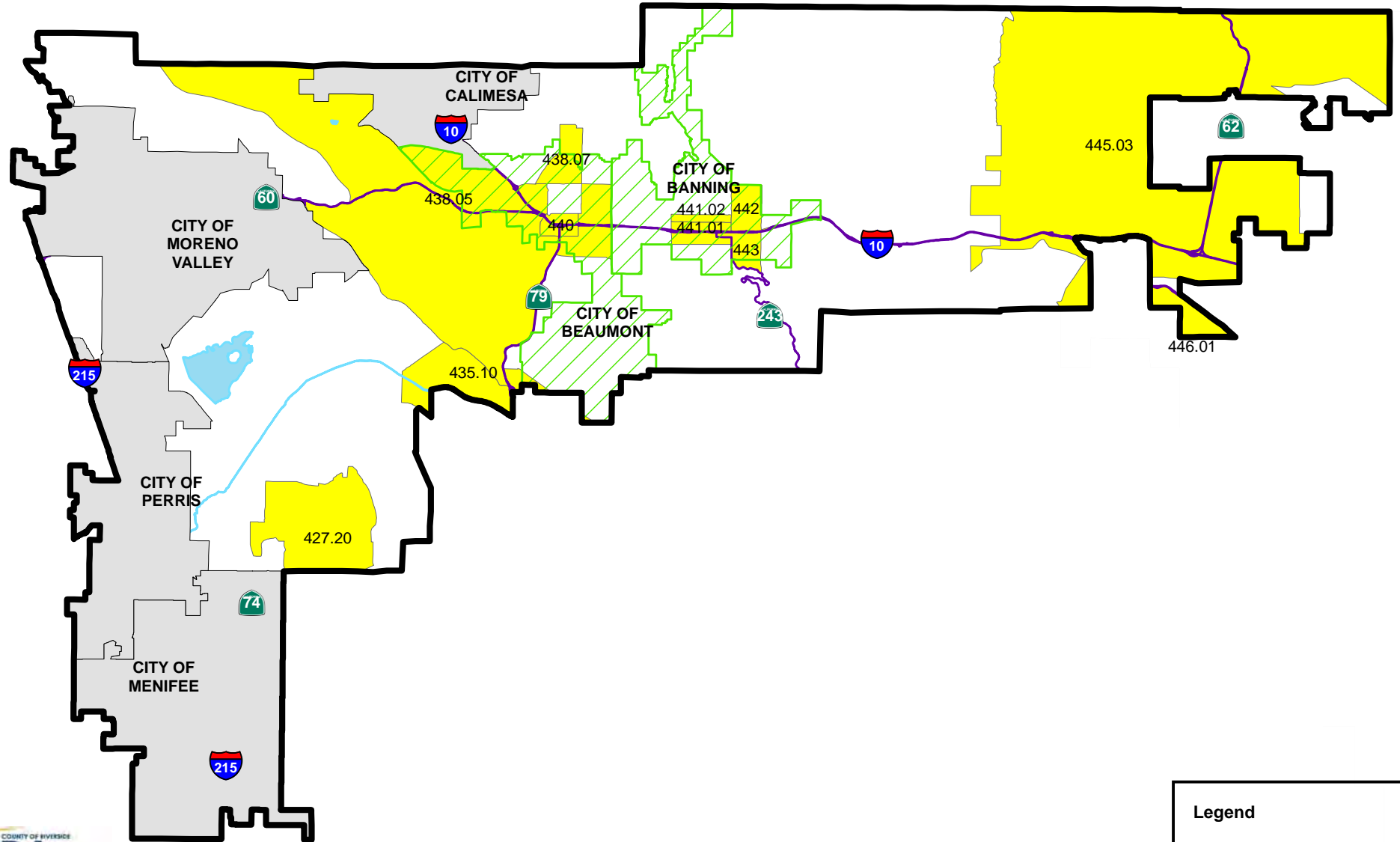


COUNTY OF RIVERSIDE
EDA
ECONOMIC DEVELOPMENT AGENCY

This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TLMA and other sources should be queried for the most current information.

*Low and Moderate Income Area is defined as a census tract with 51% or more low and moderate income population.
Source: 2000 Census, HUD Low and moderate Income Summary Data, FY13.

**Low and Moderate Income Areas
Supervisorial District 5
Riverside Urban County Jurisdiction**



This map was made by the Riverside County Economic Development Agency utilizing Geographic Information System (GIS) technology. The map elements were produced by the Assessor and the Transportation and Land Management Agency. The County of Riverside assumes no warranty or legal responsibilities for the information contained on this map. Data and information represented on this map is subject to update and modification. TLMA and other sources should be queried for the most current information.



*Low and Moderate Income Area is defined as a census tract with 51% or more low and moderate income population.
Source: 2000 Census, HUD Low and moderate Income Summary Data, FY13.

Legend

- Supervisor District 5
- Cooperating Cities
- Non-Cooperating Cities
- Low to Moderate Income Area
- Water Bodies
- Freeway/Highway