



TECHNICAL BACKGROUND REPORT SECTION 6: AFFIRMATIVELY FURTHER FAIR HOUSING ASSESSMENT

INTRODUCTION AND OVERVIEW OF AB 686

In January 2017, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH) into California state law. AB 686 defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. The Bill added an assessment of fair housing to the Housing Element which includes the following components: a summary of fair housing issues and assessment of the City’s fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities, an assessment of contributing factors, and an identification of fair housing goals and actions.

For purposes of this report, the regional analysis is of the Inland Empire which is defined by the Census Bureau as the Riverside-San Bernardino-Ontario metropolitan area.

ASSESSMENT OF FAIR HOUSING ISSUES

FAIR HOUSING ENFORCEMENT AND OUTREACH

The Fair Housing Council of Riverside County (FHCRC) is a non-profit organization that has the capacity to provide fair housing information, out-reach, and enforcement to 24 cities and communities located in Riverside County, including the City of Riverside. The organization is approved by HUD and works with government offices to ensure Fair Housing laws are upheld. The mission of the Fair Housing Council is to provide comprehensive services which affirmatively address and promote fair housing (anti-discrimination) rights and further other housing opportunities for all persons without regard to race, color, national origin, religion, sex, familial status, presence of children, disability, ancestry, marital status, or other arbitrary factors.

The FHCRC has been awarded a Fair Housing Initiatives Program (FHIP) grant that allows them to undertake various activities that affirmatively further fair housing. Activities include conducting fair housing tests on rentals, sales and design and construction; hosting the Annual Housing Conference during National Fair Housing Month; creating partnerships with local agencies, universities and colleges; conducting town hall meetings to connect the public with housing professionals and industry leaders; and systemic investigations to help re-move barriers to fair housing.

The FHCRC also provides a full range of services that include anti-discrimination training, landlord/tenant counseling, first time homebuyer seminars, foreclosure prevention, loan modification, and other fair housing trainings.

From FY 2014 through FY 2019, 518 housing discrimination complaints were processed by the FHCRC. Among these complaints, 61 percent involved disability and 14 percent involved race issues. The FHCRC also conducted routine audit tests for the City. The audit tests conducted between 2014 and 2019 involved the groups protected on the basis of race, disability, national origin, and familial status. The audits found discrimination in all sectors tested – rental, lending, and sales. The most frequent instances of discrimination were found in the rental sector.

During this time, 32,000 landlord/tenant calls were received. The City of Riverside’s 2020 Analysis of Impediments to Fair Housing (AI) found that enforcement and outreach services offered by the FHCRC were not an impediment to affirmatively furthering fair housing. The FHCRC and the City of Riverside will continue to work together to provide Fair Housing Services.

INTEGRATION AND SEGREGATION

RACE AND ETHNICITY

The ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility.

To assist in this analysis of integration and segregation, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (CTCAC) convened the California Fair Housing Task force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD).” The Task force has created Opportunity Maps to identify resources levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9 percent Low Income Housing Tax Credits (LIHTCs)”.

These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Table AFFH-1 – Domains and List of Indicators for Opportunity Maps shows the full list of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

Poverty: Tracts with at least 30 percent of population under federal poverty line.

Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County.

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

Domain	Indicator
Economic	Poverty
	Adult Education
	Employment
	Job Proximity
	Median Home Value
Environmental	CalEnviroScreen 4.0 pollution Indicators and values
Education	Math proficiency
	Reading proficiency
	High School graduation rates
	Student poverty rates

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

According to the California Fair Housing Task Force’s 2021 opportunity maps, there are five census tracts or areas of high racial segregation and poverty in Riverside. Regionally, areas with high segregation and poverty are sporadically located throughout the Inland Empire with the majority of these tracts located in and near San Bernardino.

Figure AFFH-1-Areas of Non-White Populations in Riverside-2018 shows that there are areas within Riverside that have high percentages of non-white populations, particularly north-west of the 91 freeway and surrounding the 91-60-215 freeway inter-changes near the University of California, Riverside. The southeast portion of the City has the highest population of white residents. Hispanic population increased from 49 percent to 52.7 percent from 2010 to 2018.

As shown in Figure AFFH-2- Areas of Non-White Populations in Riverside County- 2018, areas with higher percentages of non-white populations are prevalent north of Riverside in Fontana and San Bernardino and to the west in Ontario. 51 percent of the population identifies as being Hispanic or Latino, which is comparable to the City of Riverside (52.7 percent).

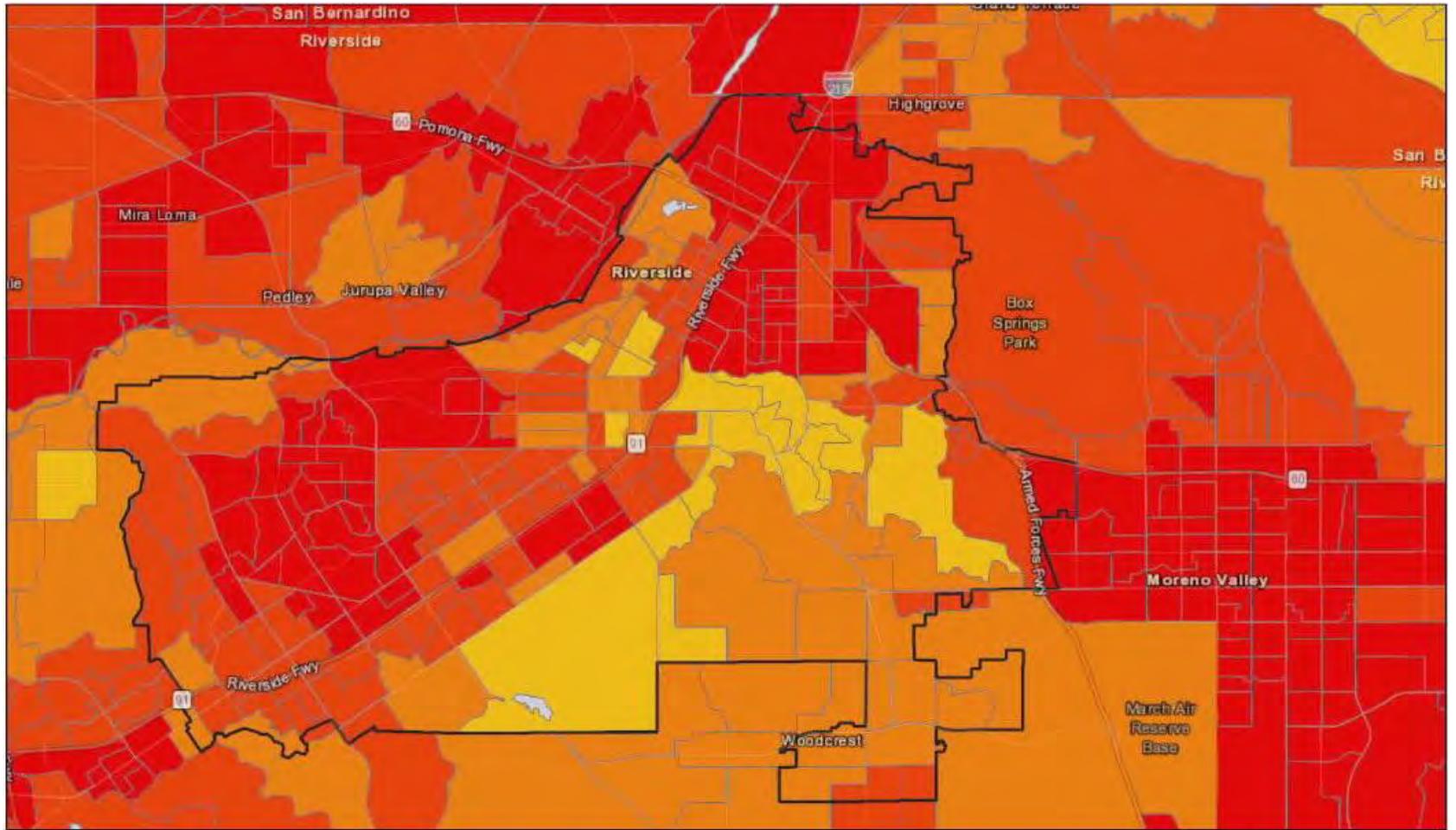
Figure AFFH-3- Hispanic Majority – City of Riverside shows that the areas of high non-white populations are also the areas where the population is predominately Hispanic. According to the the City of Riverside’s 2020 AI, Hispanics make up 52.7 percent of the City’s population. Between 2010 and 2017 the Hispanic population in the City grew by 20,782 persons.

Riverside's highest concentrations of Hispanic or Latino-identified population are primarily situated in the western part of the City, including the Arlanza and La Sierra Acres neighborhoods; in the central portion of the City south of the 91 Freeway in and near the Casa Blanca neighborhood; and in the Eastside neighborhood immediately to the east of Downtown. Each of these areas are recognized as having long histories of Hispanic and Latino settlement strongly associated with the early growth of the City's citrus and railroad industries at the turn of the 20th Century (in the cases of the Eastside and Casa Blanca) and, in the case of Arlanza and La Sierra Acres, military operations and related industrial activities during and after World War II.

The Eastside and Casa Blanca areas share similar lineages as early locations developed to house low-wage migrant workers of the City's citrus packinghouses, railroads and related industries. Minority communities developed and later flourished in these areas due in part to the de facto and de jure segregation that prohibited many from workers from finding residences in areas of "Riverside proper" to the north and west in the City's original Mile Square district (now Downtown Riverside) and its first streetcar suburbs that grew up around the former Pacific Electric streetcar routes that once traversed Magnolia Avenue.

In the western portion of the city, the largely agrarian unincorporated area that would become Arlanza and La Sierra Acres was transformed first by the establishment of Camp Anza, a base of military operations that saw the arrival and embarkation of over 600,000 servicepersons during World War II. Following the war, a series of annexations that doubled the City's size and tripled its population were concurrent with a postwar boom in the construction of suburban housing tracts on the decommissioned Camp Anza. To this day, former military barracks and operations buildings persist in this area, having been converted to homes, apartments and businesses.

Figure AFFH -1 - Areas of Non-White Populations in Riverside -2018



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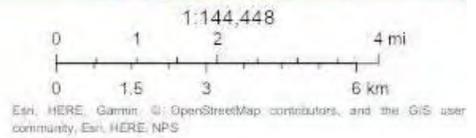
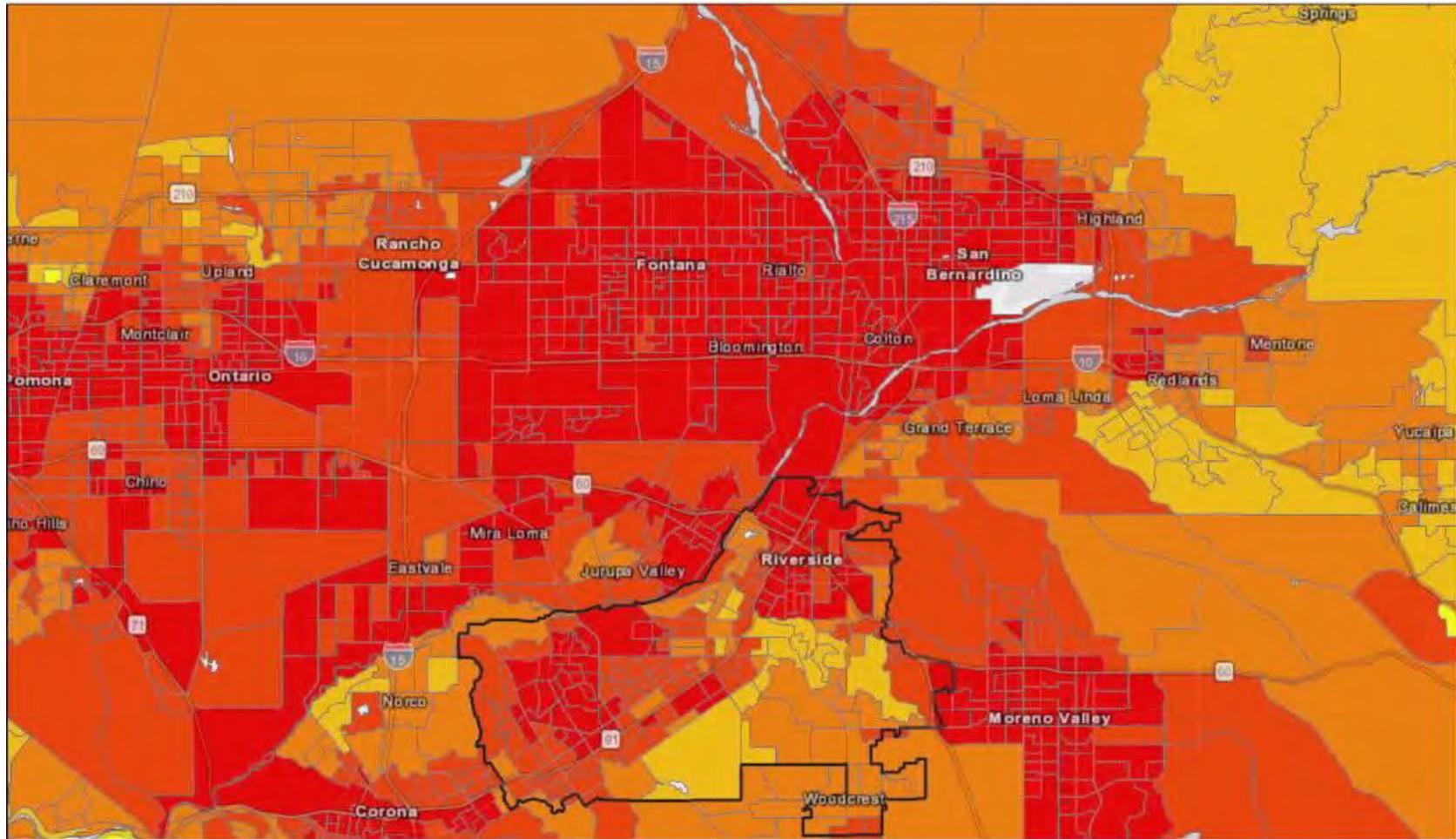
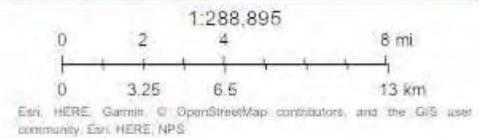


Figure AFFH-2- Areas of Non-White Populations in Riverside County- 2018



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-  City/Town Boundaries
- (R) Racial Demographics (2018) - Block Group
-  ≤ 20%
-  21 - 40%
-  41 - 60%
-  61 - 80%
-  > 81%



CA HCD

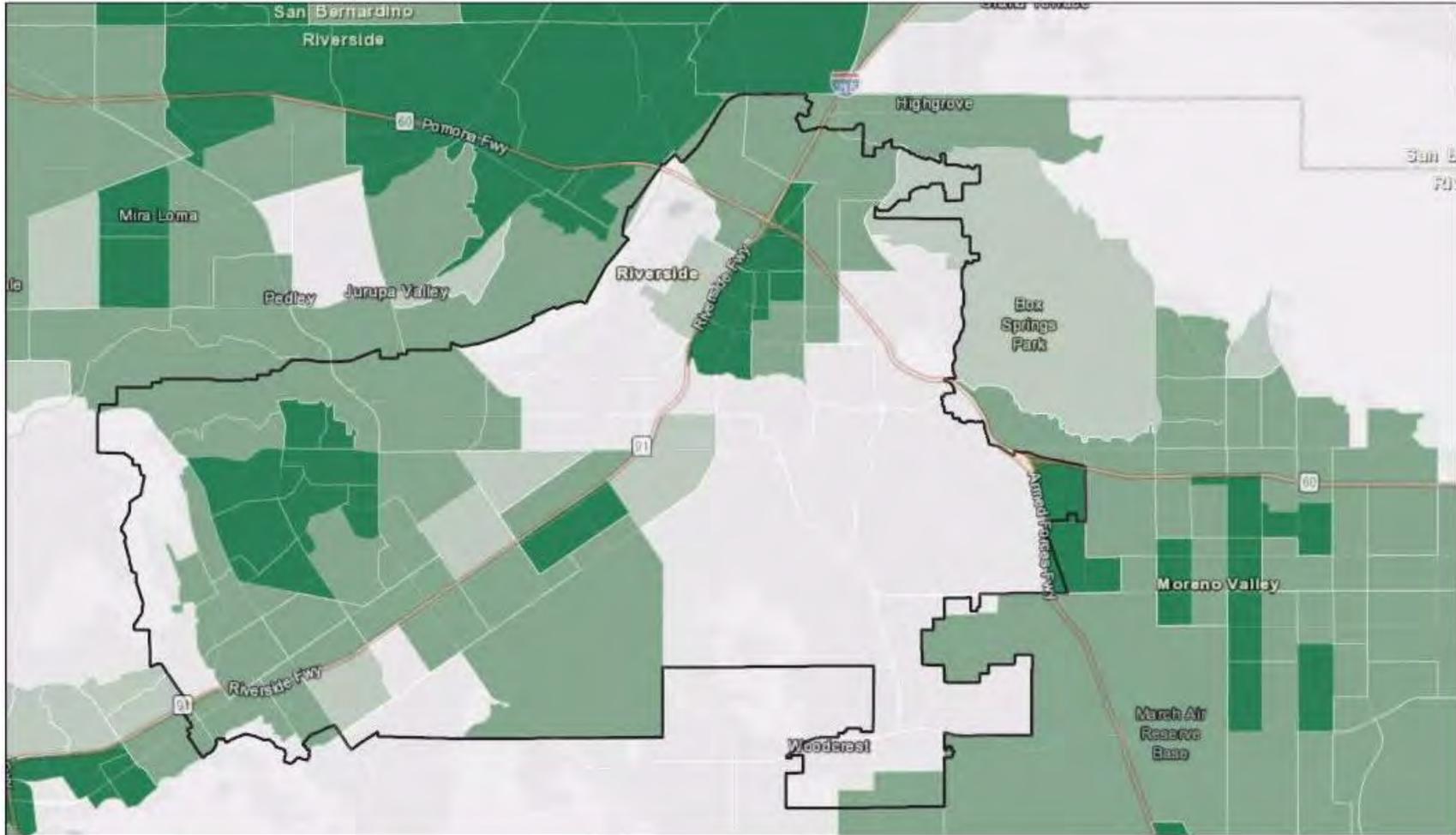
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PERSONS WITH DISABILITIES

According to the 2020 AI, of the civilian noninstitutionalized population in Riverside, an estimated 33,014 persons have a disability (10 percent). In the City, 24.7 percent of households have one or more persons with a disability. Census tracts with higher percentages of persons with disabilities (10-20 percent) are scattered throughout the City and not concentrated in one area. In the Inland Empire, there are more census tracts with a lower percentage of persons with disabilities (less than 10 percent), however the areas with lower percentages are also in areas further from city centers and access to resources.

In the Inland Empire, there are a few areas where the percentage of persons with disabilities is higher and one specifically is a census tract in the north-east in Highland. This is the location of the Patton Department of State Hospital, a forensic psychiatric hospital that provides treatment to forensically and civilly committed patients within a secure treatment area. The patients in this hospital are counted as residents of this hospital under the Census.

Figure AFFH-3-Hispanic Majority - City of Riverside



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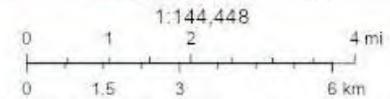
City/Town Boundaries

(R) Predominant Population - Hispanic Majority Tracts

Slim (gap < 10%)

Sizeable (gap 10% - 50%)

Predominant (gap > 50%)

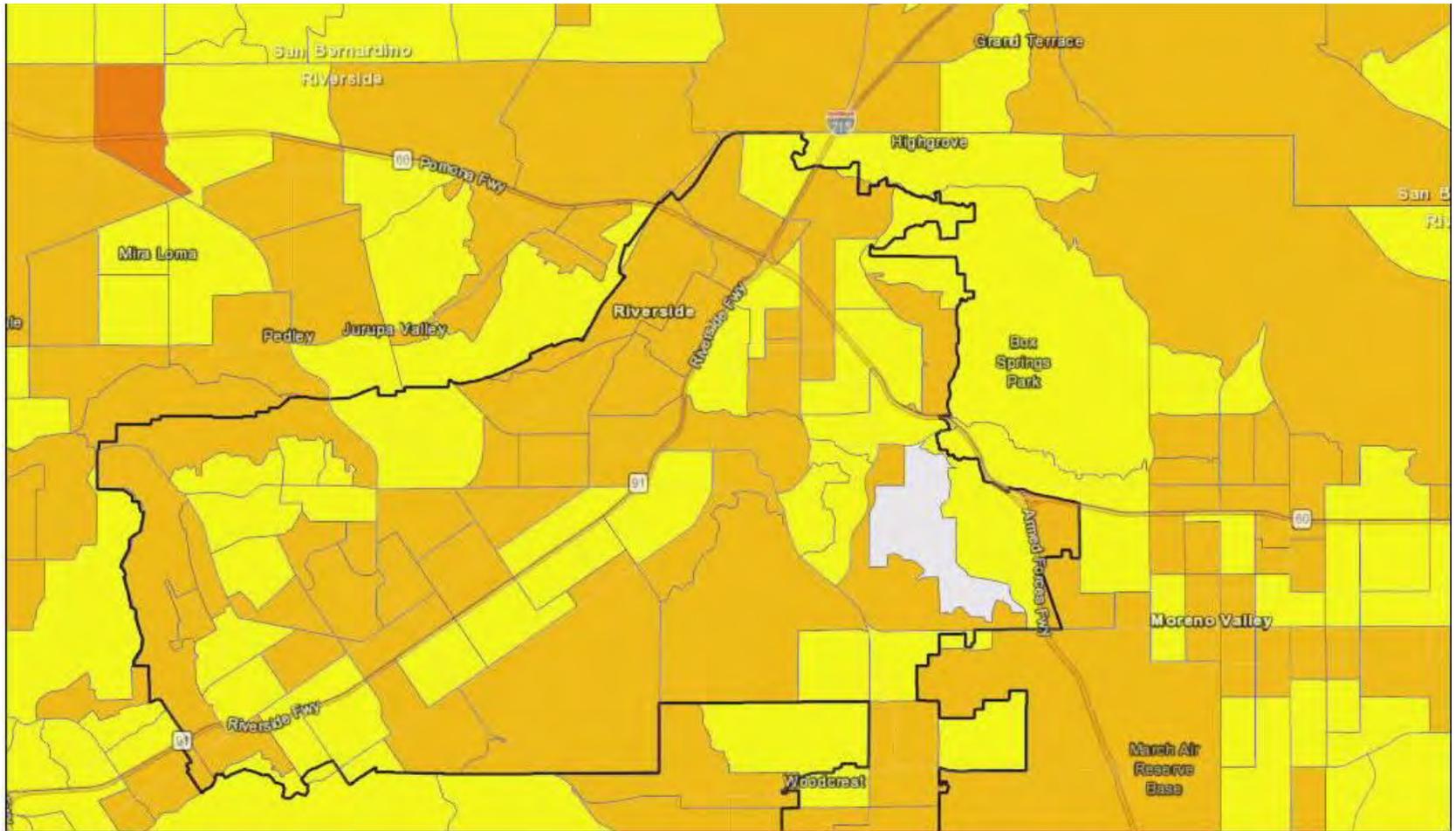


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Figure AFFH-4-Persons with Disabilities City of Riverside



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City/Town Boundaries

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%

20% - 30%

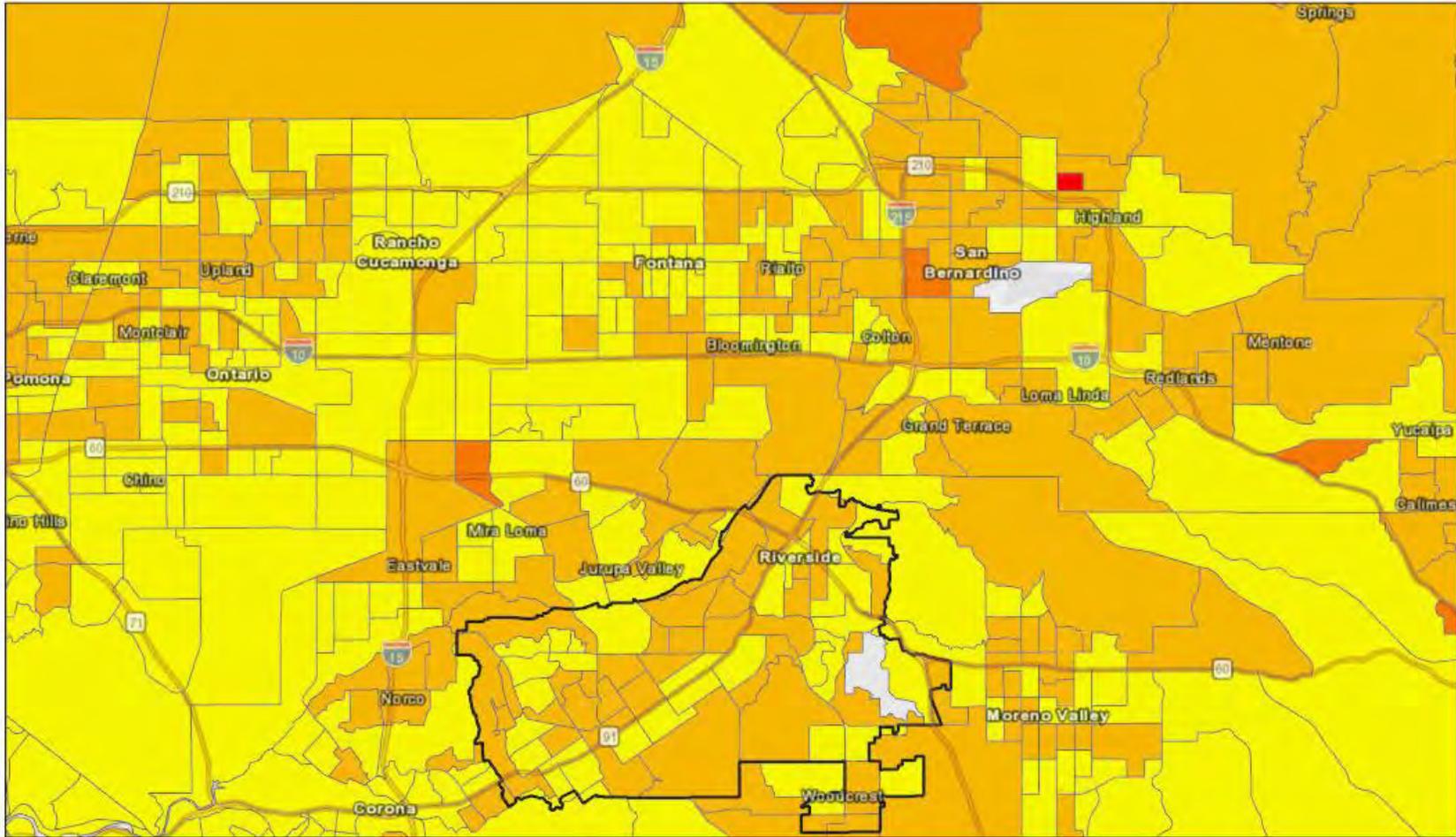
1:144,448

0 1 2 4 mi

0 1.5 3 6 km

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Figure AFFH-5 - Percent of Population with Disabilities in the Inland Empire



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City/Town Boundaries

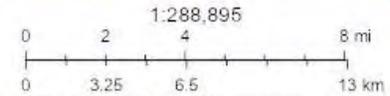
(R) Population with a Disability (ACS, 2015 - 2019) - Tract

< 10%

10% - 20%

20% - 30%

> 40%



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Figure AFFH-6-Adults Living Alone in Riverside

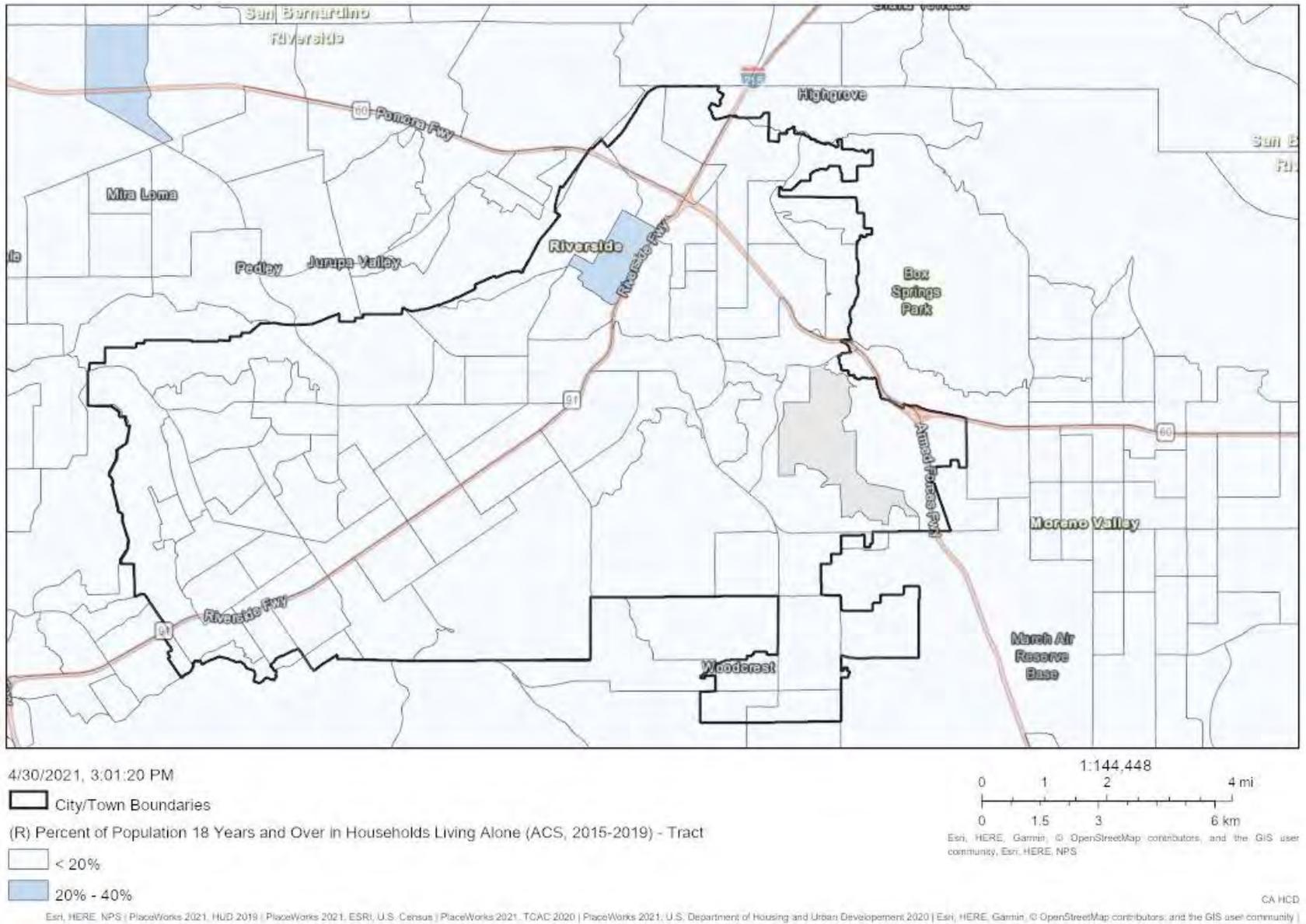
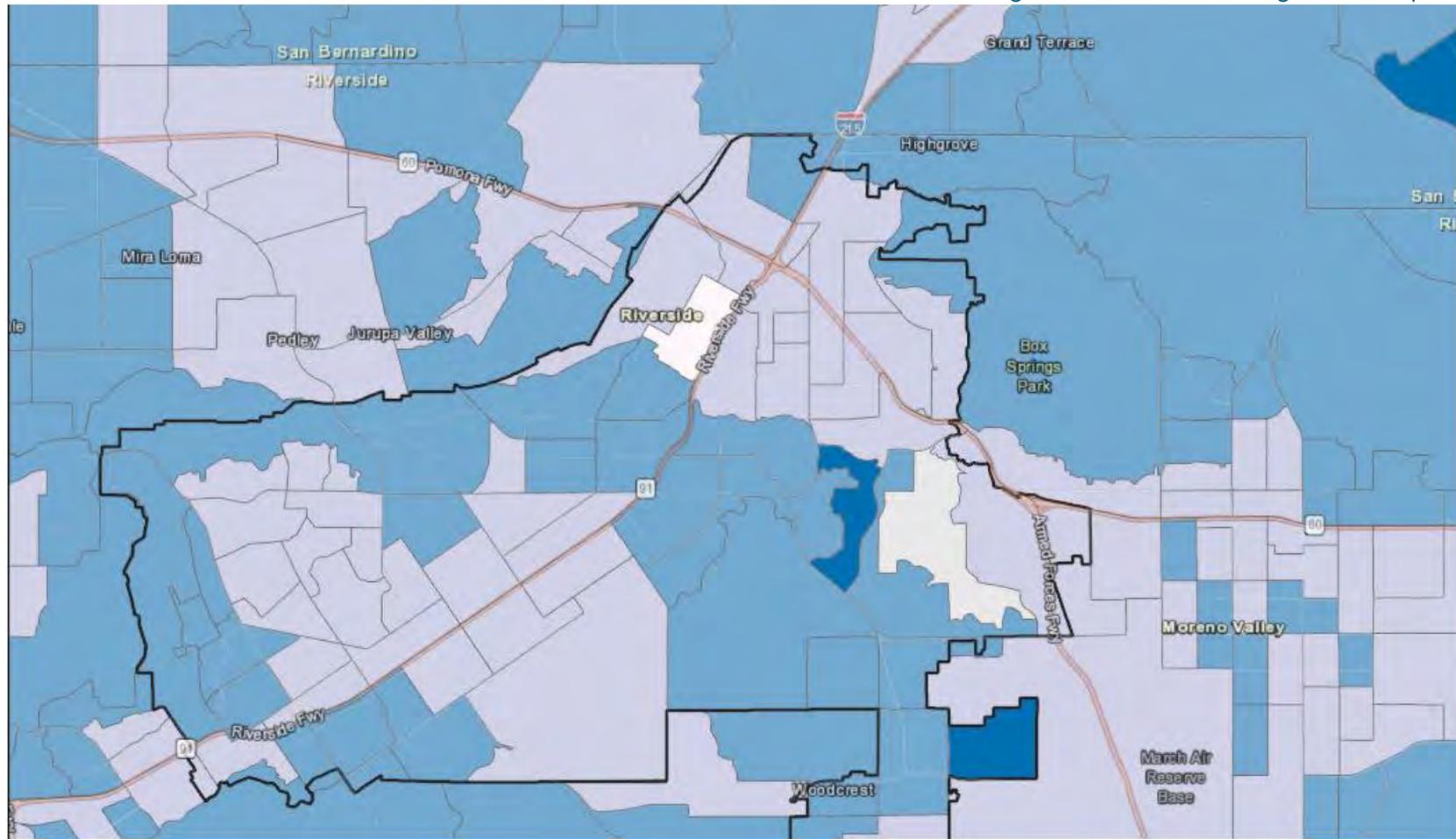


Figure AFFH-7 – Adults Living with Their Spouse



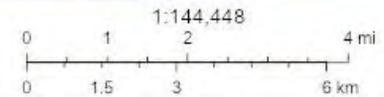
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City/Town Boundaries

(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract

< 20%

20% - 40%



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FAMILIAL STATUS

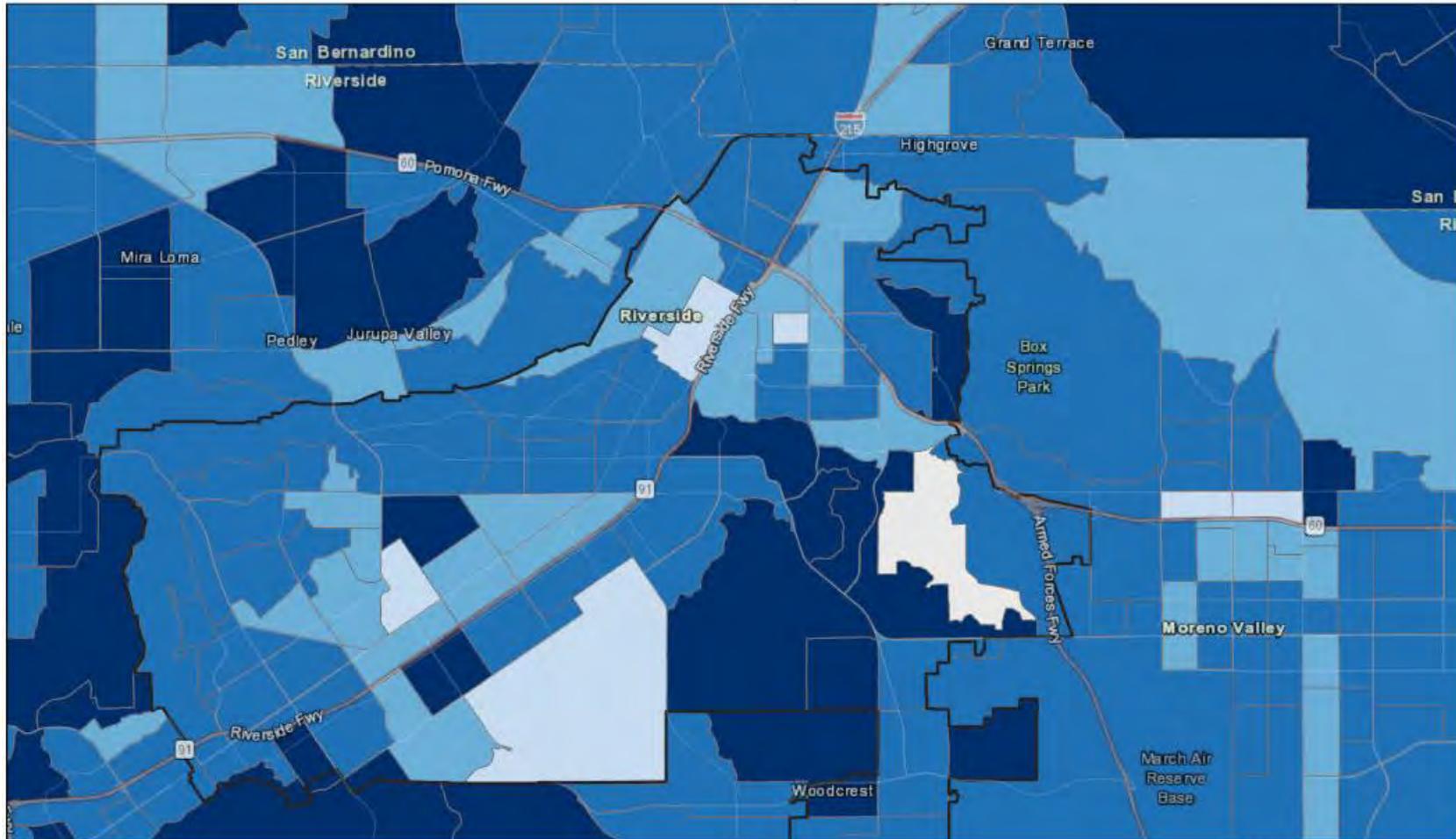
Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of the household. According to the HCD AB686/AFFH Data Viewer maps (Figure AFFH-6-Adults Living Alone in Riverside), there is only one area of concentration of households with adults living alone. This census tract is in Downtown Riverside and includes City Hall and Riverside City College. The location of the college can add to the number of single adult students, which would explain why there is a higher percentage of adults living alone within that census tract. Additionally, Downtown Riverside and the surrounding areas include several large independent and assisted senior housing developments including Mt. Rubidoux Manor (3993 Tenth Street), Plymouth Towers (3401 Lemon Street), and Silvercrest Senior Residences (3003 Orange Street) which also contribute to this area's share of single adult households.

Adults living with their spouse are spread out in the City with a most of the tracts being either 20-40 percent or 40-60 percent of adults living with their spouse). There are two tracts in the south-eastern portion of the City with a higher percentage of 60-80 percent of the adult population living with a spouse located in the Canyon Crest and Orangecrest neighborhoods, respectively. Canyon Crest was developed largely in the 1970s and 1980s as a resort-style community in the vicinity of the Canyon Crest Country Club and consists of a proportionally higher number of condominiums and common interest developments relative to the rest of the City. Orangecrest is a master-planned neighborhood of suburban tract housing developed in the late 1990s and early 2000s with relatively few urban amenities, services and employment areas.

Families with children may face housing discrimination by landlords who fear that children will cause property damage. Differential treatment such as limiting the number of children in a complex or confining child to a specific location are also fair housing concerns. Single parent households are also protected by fair housing law. According to the 2020 AI, 34.7 percent of the City's households have children under the age of 18. Households with children are made up of married couples (69.5 percent), single female headed households (21.9 percent) and single male headed households (8.6 percent). Figure AFFH-8-Percent of Children in Married-Couple Households shows that there are high percentages of children in married couple households throughout the City with some areas, especially along Alessandro Boulevard to Central Avenue, with more than 80 percent of households with children and a married couple. These areas are comprised mainly of the Victoria, Canyon Crest, Alessandro Heights, Mission Grove and Orangecrest neighborhoods, the majority of which were developed after 1980 and consist almost exclusively of suburban tract housing.

Figure AFFH-9-Children in Single-Female Headed Households shows that there are some areas with children in single female headed households in different parts of the City. Female headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care and other supportive services.

Figure AFFH-8 – Percent of Children in Married-Couple Households



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City/Town Boundaries

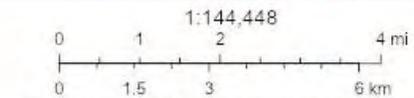
(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

20% - 40%

40% - 60%

60% - 80%

> 80%

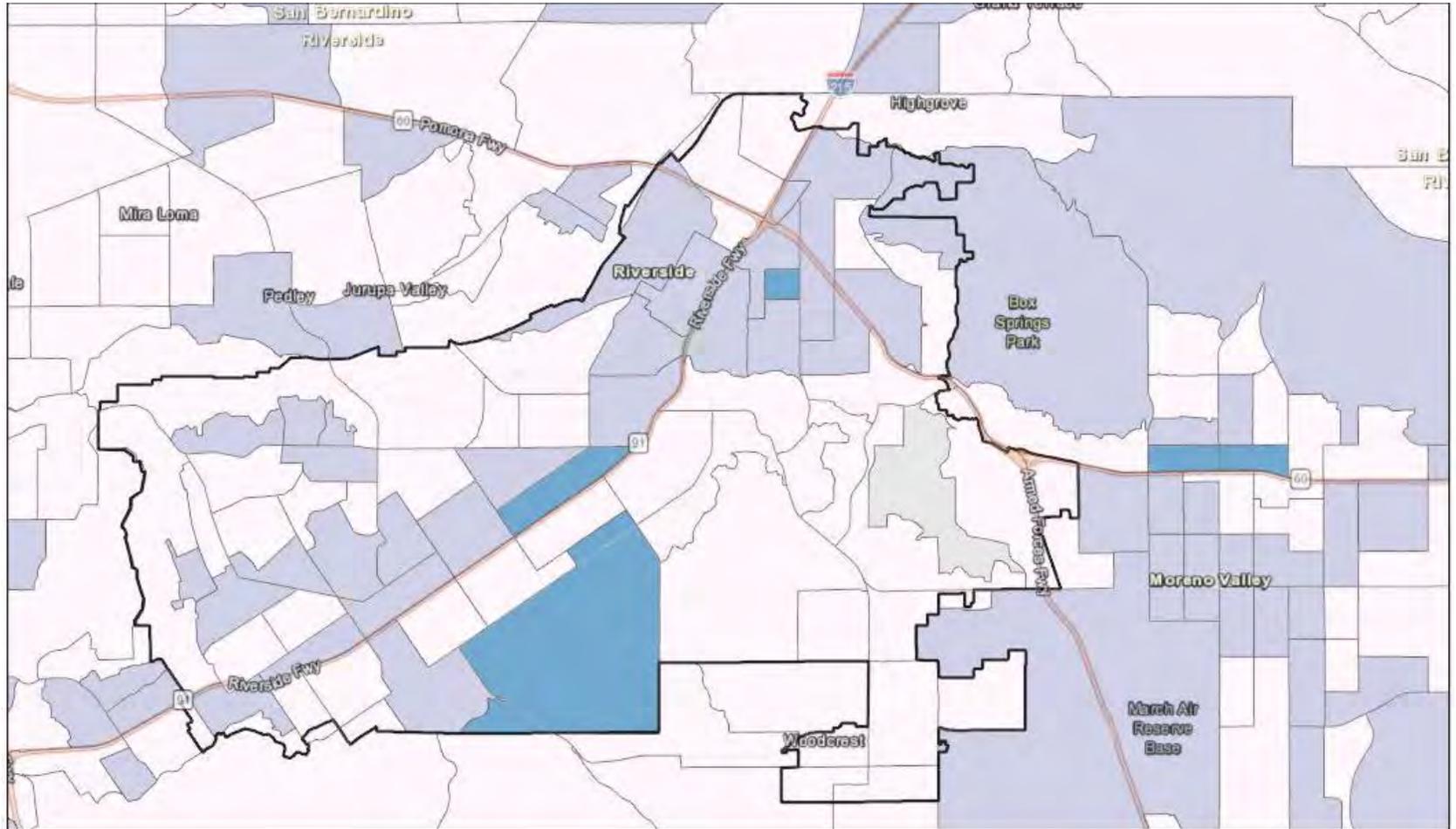


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Figure AFFH-9 – Children in Single-Female Headed Households



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City/Town Boundaries

(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

≤ 20%

20% - 40%

1:144,448

0 1 2 4 mi

0 1.5 3 6 km

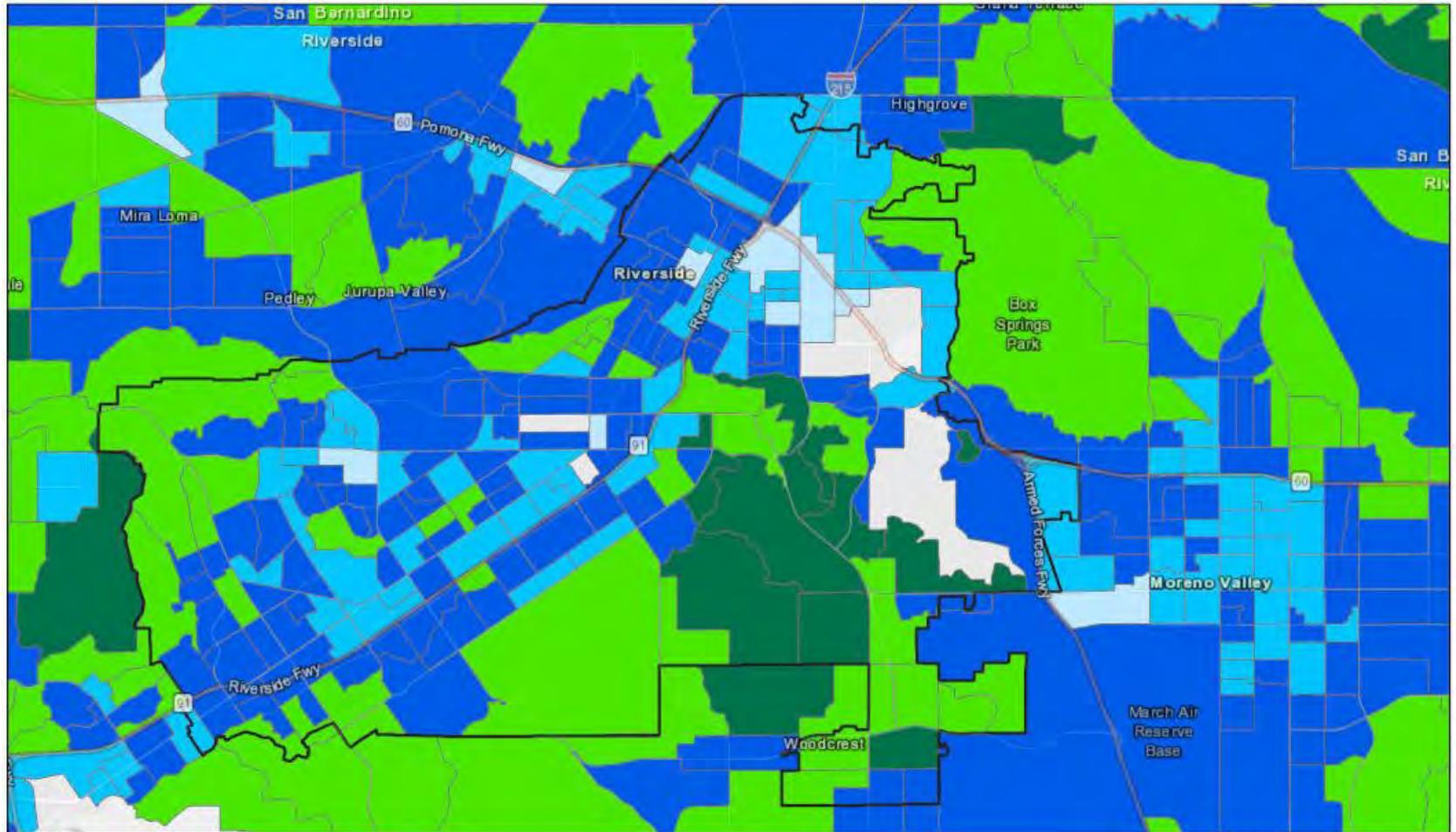
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INCOME LEVEL

Identifying areas of different incomes can help illustrate how individuals in those areas are influenced by their surroundings and what can be used to overcome patterns of segregation that may be present. With the HCD AB686/AFFH Data Viewer map, the median income in the state is compared to the median incomes of each Census block group. Figure AFFH-10-Median Income in Riverside shows block groups and how the median income in those groups compares to the median state income of \$87,100. Areas of the City that have a higher median income than the state are primarily concentrated at the north-western and southeastern edges of the City, which coincide largely with areas of more recent development and fewer urban services and amenities. By contrast, areas of the City with lower median income block groups are primarily concentrated along the City's major east-west transportation corridors (i.e., Magnolia and Arlington Avenues) in the western portion of the City, as well as the northern portion of the City in the vicinity of the 60-91-215 interchange. These areas coincide with the older and more urbanized parts of the City. However, there are pockets of higher-than-state median income scattered throughout these areas as well, reflecting the significant variations in patterns of development in a city as large and diverse as Riverside.

In the Inland Empire, there are areas on the outer edges of cities that have higher median income block groups as Figure AFFH-11-Median Income in Riverside County shows. In North Rancho Cucamonga there are higher median income block groups that line the mountains and hills and surround Chaffey College and the North Etiwanda Preserve. This is also seen to the east in Highland and Redlands in the communities that reside along the Santa Ana riverbed, including Eastvale, Norco, Corona and Chino Hills.

Figure AFFH-10 – Median Income in Riverside



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- City/Town Boundaries
- (R) Median Income (ACS, 2015-2019) - Block Group
 - < \$87,100 (HCD 2020 State Median Income)
 - < \$125,000
 - < \$30,000
 - Greater than \$125,000
 - < \$55,000

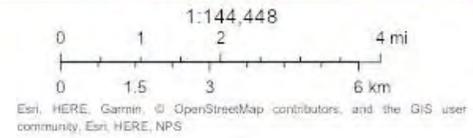
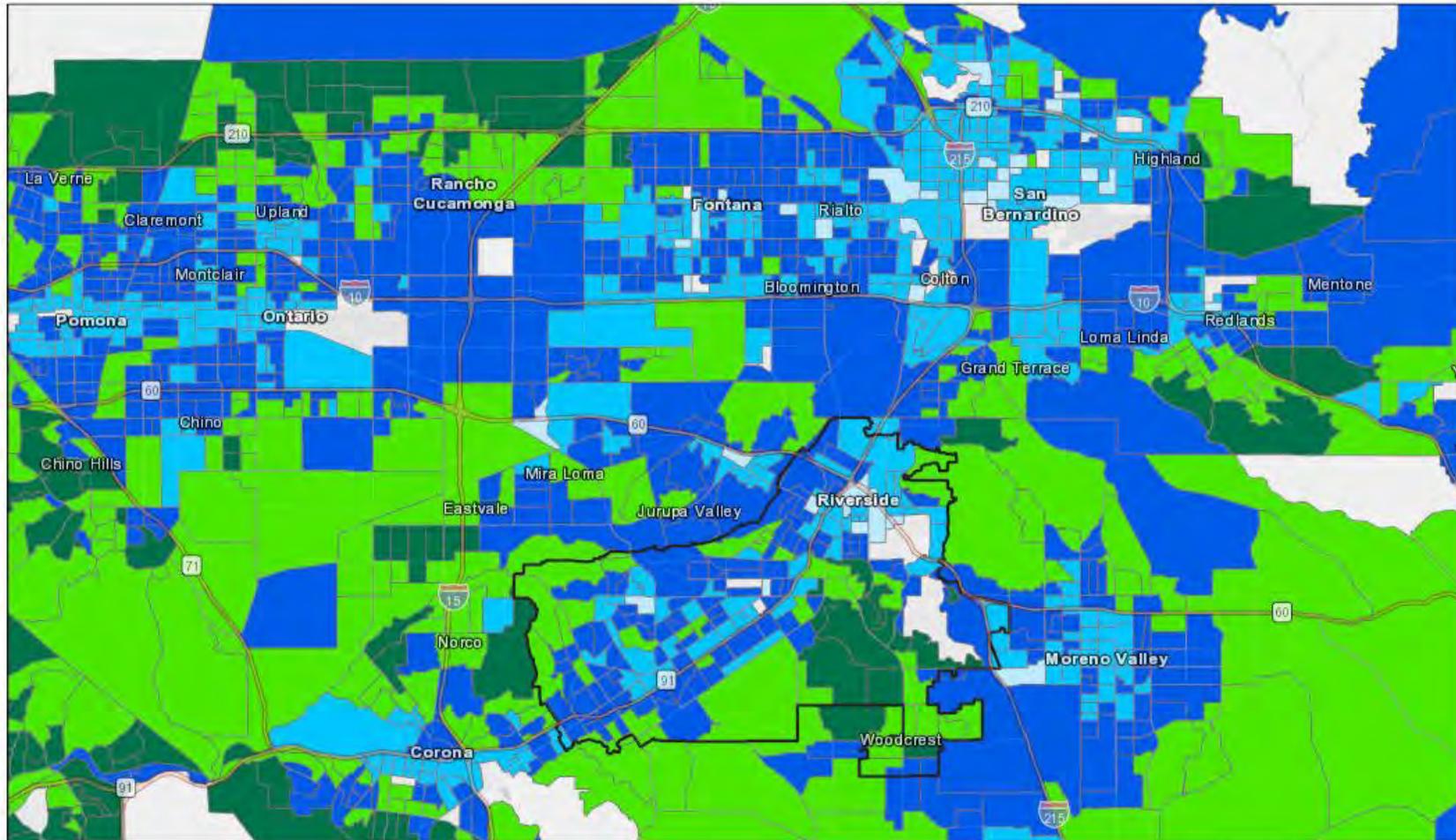


Figure AFFH-11 – Median Income in Riverside County



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- City/Town Boundaries
- < \$87,100 (HCD 2020 State Median Income)
- (R) Median Income (ACS, 2015-2019) - Block Group < \$30,000
- < \$55,000
- < \$125,000
- Greater than \$125,000



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RACIALLY AND ETHNICALLY CONCENTRATED AREAS

RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY

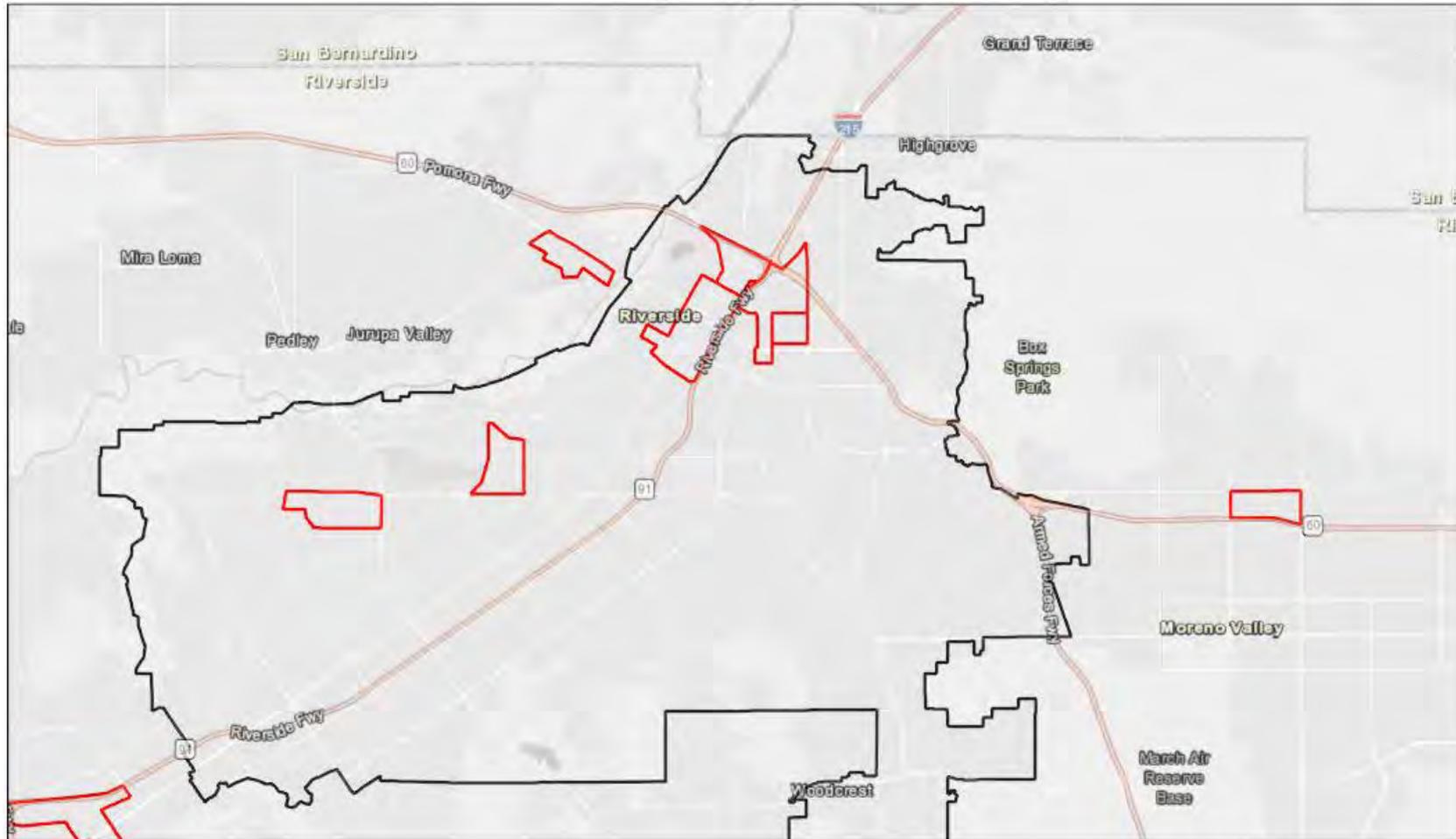
The TCAC/HCD approach to calculating racially/ethnically concentrated areas of poverty (R/ECAPs) uses a location quotient for segregation and a poverty threshold of 30 percent of the population living below the poverty line. This approach helps to measure concentration of race in a small area for a more precise result. In Riverside, there are six areas in the City identified as racially/ethnically concentrated areas of poverty as Figure AFFH-12-Areas of High Segregation and Poverty – Riverside shows.

A cluster of four of these areas is in the northern part of the City surrounding Downtown and includes parts of the Eastside neighborhood. Others coincide with higher concentrations of industrial land uses in the Airport and Arlanza neighborhoods. In the Inland Empire, a majority of the R/ECAPs are concentrated in San Bernardino area as Figure AFFH-13- Areas of High Segregation and Poverty – Riverside County shows.

RACIALLY CONCENTRATED AREAS OF AFFLUENCE

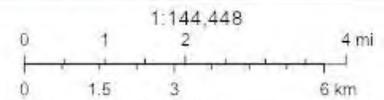
While racially concentrated areas of poverty and segregation (RECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. RCAAs are defined as census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater. There are four areas that have a non-white population of 20-40 percent and have a median income higher than \$125,000 in the City. These four areas are in the southeast near Alessandro Boulevard as Figure AFFH-14- Income and Race – City of Riverside shows and are considered to be areas of affluence within the community.

Figure AFFH-12 - Areas of High Segregation and Poverty - Riverside



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-  City/Town Boundaries
-  (R) TCAC Area of High Segregation and Poverty (2021) - Tract

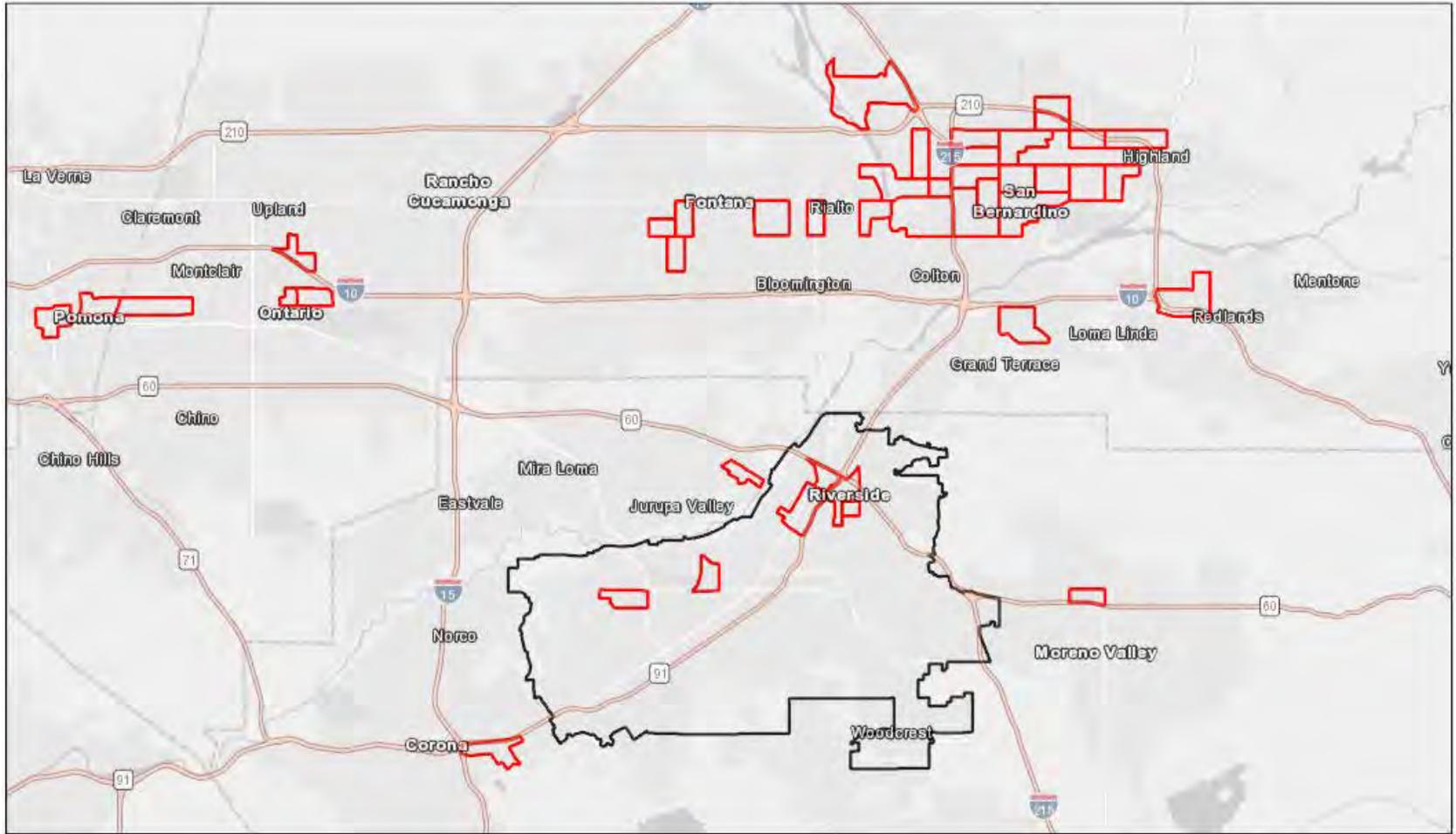


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Figure AFFH-13 - Areas of High Segregation and Poverty - Riverside County



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- City/Town Boundaries
- (R) TCAC Area of High Segregation and Poverty (2021) - Tract

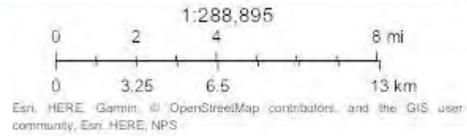
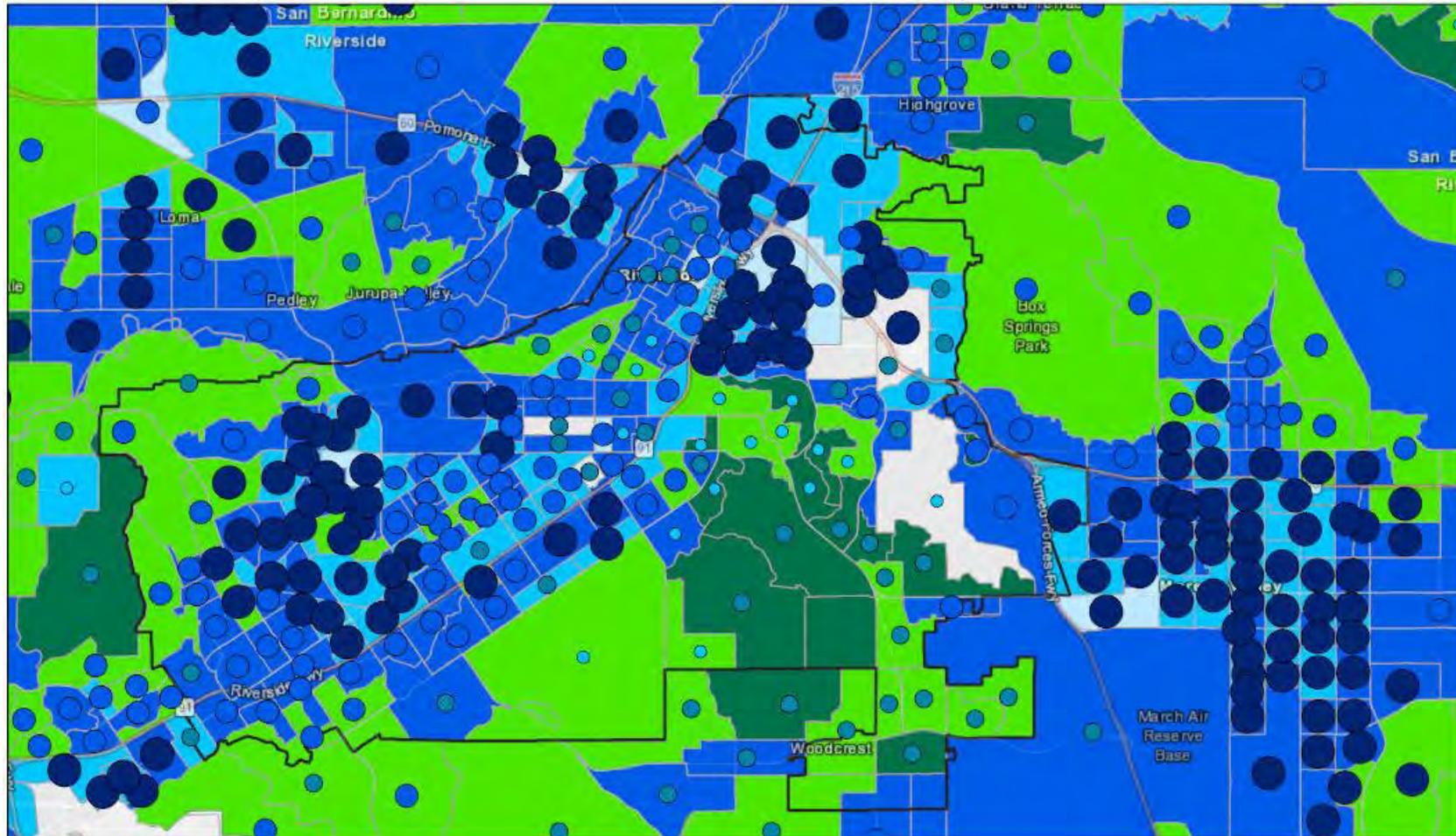


Figure AFFH-14 – Income and Race – City of Riverside



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City/Town Boundaries

(R) Racial Demographics (2018) - Block Group - Graduated Dots

20% - 40%

40% - 60%

60% - 80%

80% - 100%

(R) Median Income (ACS, 2015-2019) - Block Group

< \$30,000

< \$55,000

< \$87,100 (HCD 2020 State Median Income)

< \$125,000

Greater than \$125,000

1:144,448

0 1 2 4 mi

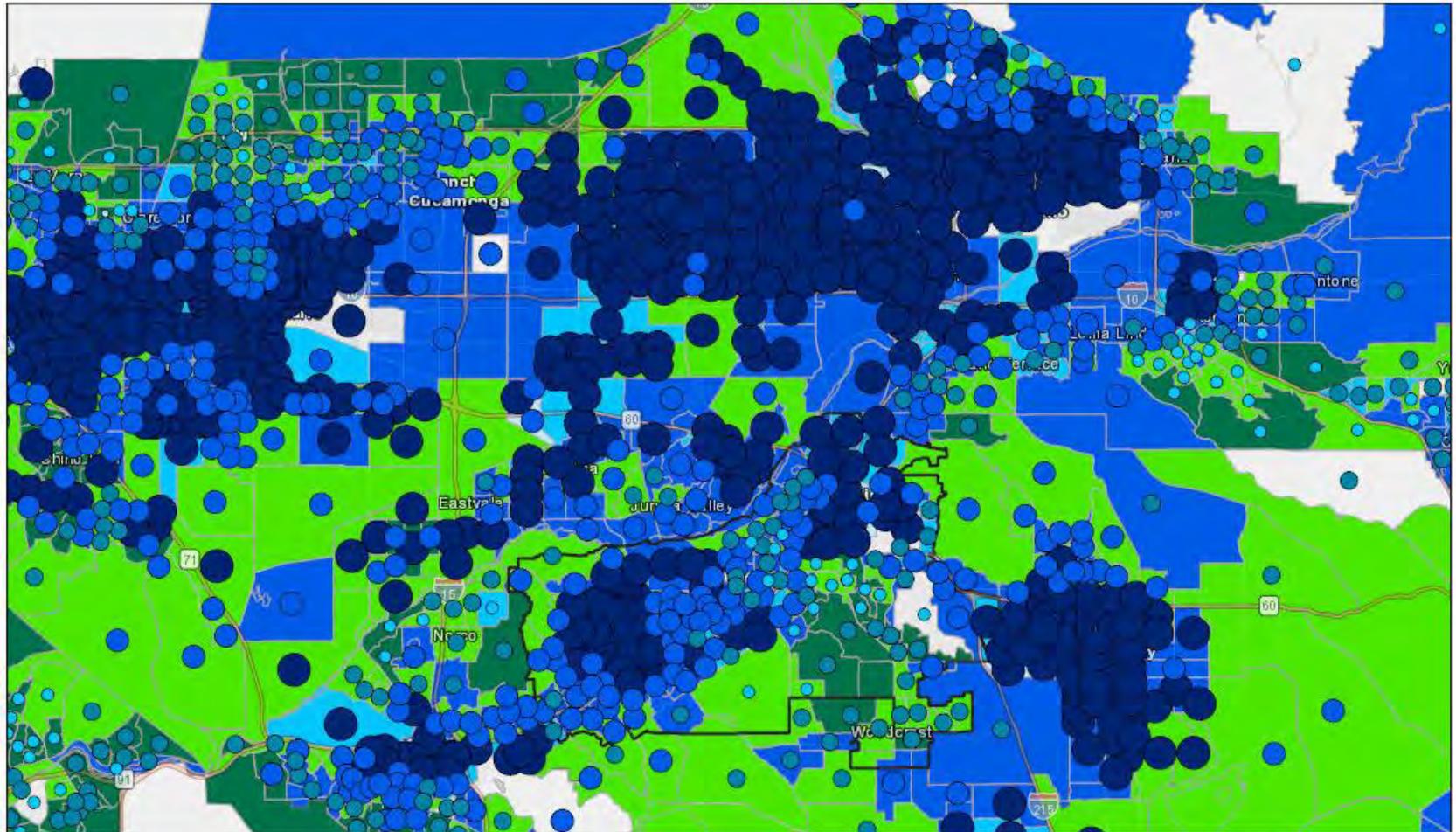
0 1.5 3 6 km

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Figure AFFH-15 – Income and Race in the Inland Empire



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City/Town Boundaries

(R) Racial Demographics (2018) - Block Group - Graduated Dots

○ 0 - 20%

● 20% - 40%

● 40% - 60%

● 60% - 80%

● 80% - 100%

(R) Median Income (ACS, 2015-2019) - Block Group

■ < \$30,000

■ < \$55,000

■ < \$87,100 (HCD 2020 State Median Income)

■ < \$125,000

■ Greater than \$125,000

1:288,895

0 2 4 8 mi

0 3.25 6.5 13 km

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ACCESS TO OPPORTUNITIES

TCAC/HCD OPPORTUNITY MAPS

In collaboration, the California Tax Credit Allocation Committee (TCAC) and HCD developed the TCAC/HCD Opportunity Maps, a mapping tool that identifies areas of higher and lower resources to evaluate access to opportunity. The tool maps areas of highest resource, high resource, moderate resource, moderate resource (rapidly changing), low resource and high segregation and poverty.

- High and Highest Resource: four indicators of the census tract had an above-average score compared to other tracts in the Region.
- Moderate Resource: two indicators of the census tract have scores above the 40th percentile in the Region.
- Moderate Resource (rapidly changing): have the qualifications for moderate resource, plus at least two of the indicators had significant statistical increases above the 75th percentile of change for tracts in the Region between 2000 and 2018.
- Low resource: indicators for the census tract scored the lowest of the Region.
- High Segregation and Poverty: the tract has the some of the highest segregation and poverty in the Region.

The mapping tool identified seven highest resource and 11 high resource census tracts in Riverside as Table AFFH-2-Census Tract by Resource Level and Figure AFFH-16- High Resource Census Tracts show.

Table AFFH-2 – Census Tracts by Resource Level

Census Tract	Neighborhood	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final
6065030601	Alessandro Heights	0.99	0.4	0.74	0.70	Highest Resource
6065042004	Orangecrest	0.9	0.59	0.88	0.76	Highest Resource
6065042005	Orangecrest	0.92	0.47	0.93	0.82	Highest Resource
6065042012	Mission Grove	0.82	0.25	0.89	0.56	Highest Resource
6065042207	Canyon Crest	0.96	0.46	0.72	0.59	Highest Resource
6065042208	Canyon Crest	0.95	0.39	0.72	0.54	Highest Resource
6065042217	Mission Grove	0.9	0.43	0.83	0.63	Highest Resource
6065030200	Downtown	0.89	0.07	0.62	0.10	High Resource

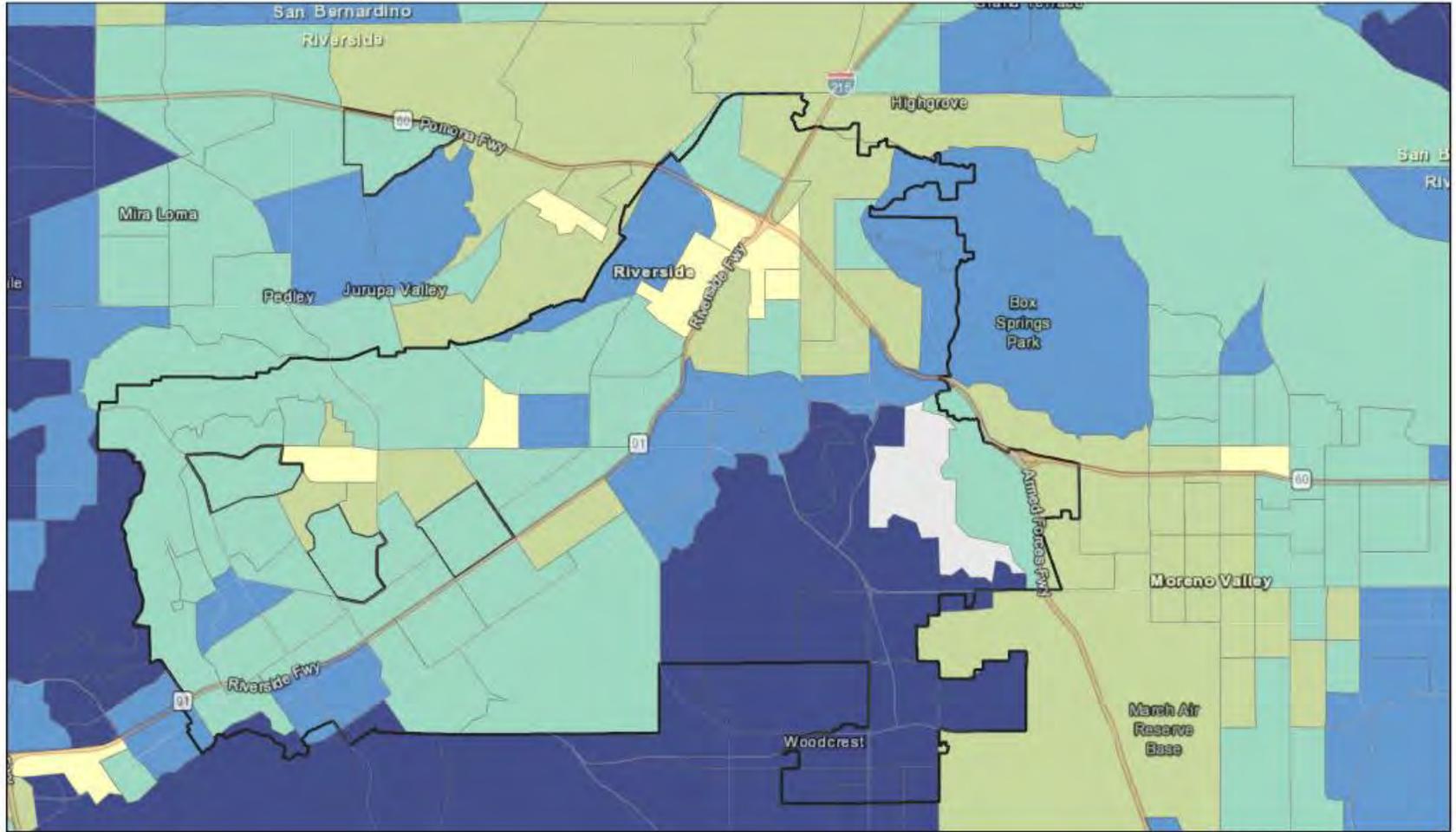
Census Tract	Neighborhood	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final
6065030602	Hawarden Hills	0.83	0.36	0.69	0.32	High Resource
6065030603	Victoria	0.94	0.31	0.61	0.34	High Resource
6065031001	Magnolia Center	0.76	0.31	0.59	0.12	High Resource
6065031200	Victoria	0.69	0.24	0.67	0.13	High Resource
6065040901	La Sierra	0.77	0.47	0.39	0.07	High Resource
6065041403	La Sierra South	0.78	0.3	0.52	0.09	High Resource
6065042206	Canyon Crest	0.84	0.24	0.79	0.41	High Resource
6065042213	University	0.73	0.33	0.65	0.16	High Resource
6065042214	University	0.81	0.37	0.37	0.06	High Resource
6065030501	University	0.27	0.28	0.6	-0.22	Moderate Resource
6065030700	Wood Streets Downtown	0.75	0.15	0.59	0.02	Moderate Resource
6065030800	Grand	0.65	0.23	0.56	-0.01	Moderate Resource
6065030900	Airport	0.56	0.13	0.43	-0.20	Moderate Resource
6065031100	Magnolia Center Wood Streets	0.61	0.13	0.56	-0.10	Moderate Resource
6065031401	Magnolia Center	0.42	0.17	0.45	-0.26	Moderate Resource
6065031402	Magnolia Center	0.55	0.27	0.45	-0.12	Moderate Resource
6065031701	Arlington Heights	0.41	0.18	0.64	-0.12	Moderate Resource
6065031702	Arlington Heights Arlington South	0.65	0.32	0.57	0.03	Moderate Resource
6065031703	Arlington South	0.58	0.21	0.59	-0.05	Moderate Resource

Census Tract	Neighborhood	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final
6065031704	Arlington South Presidential Park	0.67	0.15	0.44	-0.11	Moderate Resource
6065040902	La Sierra, La Sierra Hills	0.65	0.19	0.47	-0.08	Moderate Resource
6065040903	La Sierra La Sierra Hills	0.49	0.48	0.37	-0.12	Moderate Resource
6065040904	La Sierra La Sierra Hills	0.66	0.5	0.34	-0.02	Moderate Resource
6065041003	La Sierra Acres	0.74	0.48	0.36	0.03	Moderate Resource
6065041301	La Sierra Acres	0.41	0.5	0.28	-0.23	Moderate Resource
6065041302	La Sierra Acres	0.51	0.44	0.24	-0.21	Moderate Resource
6065041406	La Sierra	0.71	0.23	0.48	-0.02	Moderate Resource
6065041407	La Sierra	0.5	0.31	0.45	-0.14	Moderate Resource
6065041408	La Sierra	0.46	0.12	0.51	-0.23	Moderate Resource
6065042210	University	0.52	0.22	0.45	-0.15	Moderate Resource
6065050900	Canyon Springs	0.87	0.17	0.36	0.03	Moderate Resource
6065031501	Ramona	0.72	0.22	0.41	-0.05	Moderate Resource (Rapidly Changing)
6065041102	La Sierra Acres	0.47	0.46	0.39	-0.13	Moderate Resource (Rapidly Changing)

Census Tract	Neighborhood	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final
6065041201	Arlington Arlanza	0.55	0.36	0.27	-0.19	Moderate Resource (Rapidly Changing)
6065030400	Eastside	0.49	0.03	0.53	-0.33	Low Resource
6065031300	Casa Blanca Presidential Park	0.36	0.04	0.61	-0.35	Low Resource
6065031502	Ramona	0.45	0.19	0.34	-0.28	Low Resource
6065040201	Hunter Industrial Park	0.62	0.11	0.17	-0.36	Low Resource
6065041001	Arlanza	0.44	0.2	0.32	-0.28	Low Resource
6065041202	Arlanza	0.34	0.43	0.28	-0.30	Low Resource
6065041203	Arlanza	0.37	0.25	0.31	-0.33	Low Resource
6065042209	University Hunter Industrial Park	0.35	0.05	0.46	-0.43	Low Resource
6065046500	University	0.14	0.18	0.65	-0.34	Low Resource
6065030103	Downtown	0.35	0.02	0.59	0.00	High Segregation & Poverty
6065030300	Downtown	0.48	0.05	0.53	0.00	High Segregation & Poverty
6065030502	Eastside, University	0.28	0.03	0.39	0.00	High Segregation & Poverty
6065030503	Eastside, University	0.25	0.09	0.56	0.00	High Segregation & Poverty
6065031002	Magnolia Center Airport	0.29	0.33	0.55	0.00	High Segregation & Poverty

Census Tract	Neighborhood	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final
6065041101	Arlanza	0.29	0.23	0.31	0.00	High Segregation & Poverty

Figure AFFH-16- High Resource Census Tracts



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City/Town Boundaries

(R) TCAC Opportunity Areas (2021) - Composite Score - Tract

Highest Resource

High Resource

Moderate Resource (Rapidly Changing)

Moderate Resource

Low Resource

High Segregation & Poverty

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0 1 2 4 mi

0 1.5 3 6 km

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OPPORTUNITY INDICATORS

The 2020 AI identifies opportunity indices and the factors that could possibly contribute to fair housing issues. The 2020 AI used opportunity indicators developed by HUD to help inform communities about disparities in access to opportunity. These indices are only available to Entitlement Jurisdictions (i.e., those with population over 50,000 and receiving Community Development Block grant (CDBG) funds from HUD), including Riverside.

EDUCATION

The “school proficiency index” developed by HUD uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The school proficiency index is a function of the percent of 4th grade students proficient in reading and math on state test scores for up to three schools within 3 miles of a block-group’s most central point.

The index values are percentile ranked at the state level and range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood. According to the 2020 AI, for Riverside (the aggregate of all neighborhoods), the school proficiency index scores were:

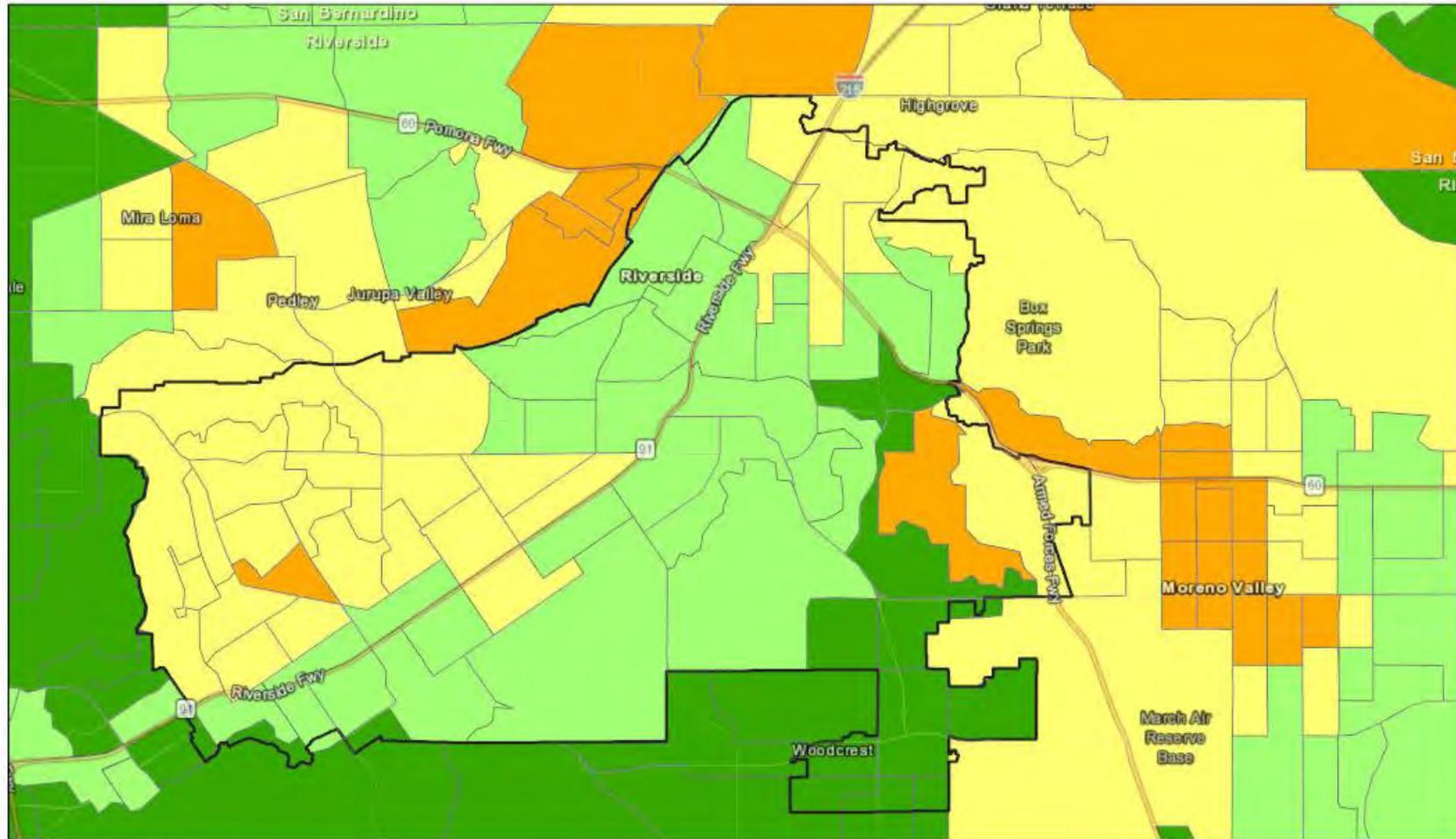
- White, Non-Hispanic: 44.84
- Black, Non-Hispanic: 43.36
- Asian or Pacific Islander, Non-Hispanic: 44.30
- Native American, Non-Hispanic: 39.46
- Hispanic: 36.36

These index scores indicate that Hispanic and Native American, non-Hispanic students had the lowest access to schools with high proficiency scores. These index scores indicate that Hispanic and Native American, non-Hispanic students had the lowest access to schools with high proficiency scores. According to the 2020 AI, with the exception of Hispanics, all other students are enrolled in schools that score above average in their proficiency at a higher proportion than the demographic proportion of the entire population enrolled.

The TCAC/HCD Opportunity Maps can help to identify areas within the community that provide good access to opportunity for residents or, conversely, provide poor access to opportunity. In Riverside, there are clusters of areas that provide different ranges of access to better educational outcomes (Figure 17). In the western portion of the City there a number of Census tracts that have some of the least positive educational outcomes. In this area there is also one tract with the lowest score compared to its neighboring tracts. In other parts of the City, such as the southeast, there are tracts with higher educational outcomes which coincide with the higher median income areas. By contrast, the lower-scoring census tracts also have some of the lowest median incomes. It should be noted that the low score tract on the east side of the City is the Sycamore Canyon Wilderness Park that has no housing or population.

Kidsdata.org reported that in 2019, 67.2 percent of students in Riverside County are considered to be high-need (i.e. those who are eligible for free or reduced-price school meals, are English Learners, or are foster youth—as reported in the Unduplicated Pupil Count). In the Riverside Unified School District (RUSD), 66 percent of students are considered high-need while in Alvord Unified School District, which serves the western half of the City, 81 percent of the students are considered to be high-need. Alvord Unified serves the areas of the city with some of the lowest scoring tracts.

Figure AFFH-17- TCAC Education Opportunities



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City/Town Boundaries

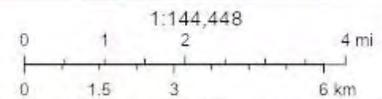
(R) TCAC Opportunity Areas (2021) - Education Score -Tract

< 0.25 (Less Positive Education Outcomes)

0.25 - 0.50

0.50 - 0.75

> 0.75 (More Positive Education Outcomes)



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EMPLOYMENT

In the 2020 AI, it was reported that the City of Riverside has a pronounced specialization in educational services, warehousing and storage, and specialty trade contractors in terms of major employment sectors. This specialization is due to the presence of UC Riverside and other major public and private educational institutions in the City, and the Inland Empire's proximity to the ports of Los Angeles and Long Beach, which has, in concert with the ascendancy of online retailing, precipitated substantial increases in the amount of industrial construction for the logistics and goods movement industries throughout the region, particularly over the past two decades. Together, these three sectors account for over 20 percent of the city's private employment.

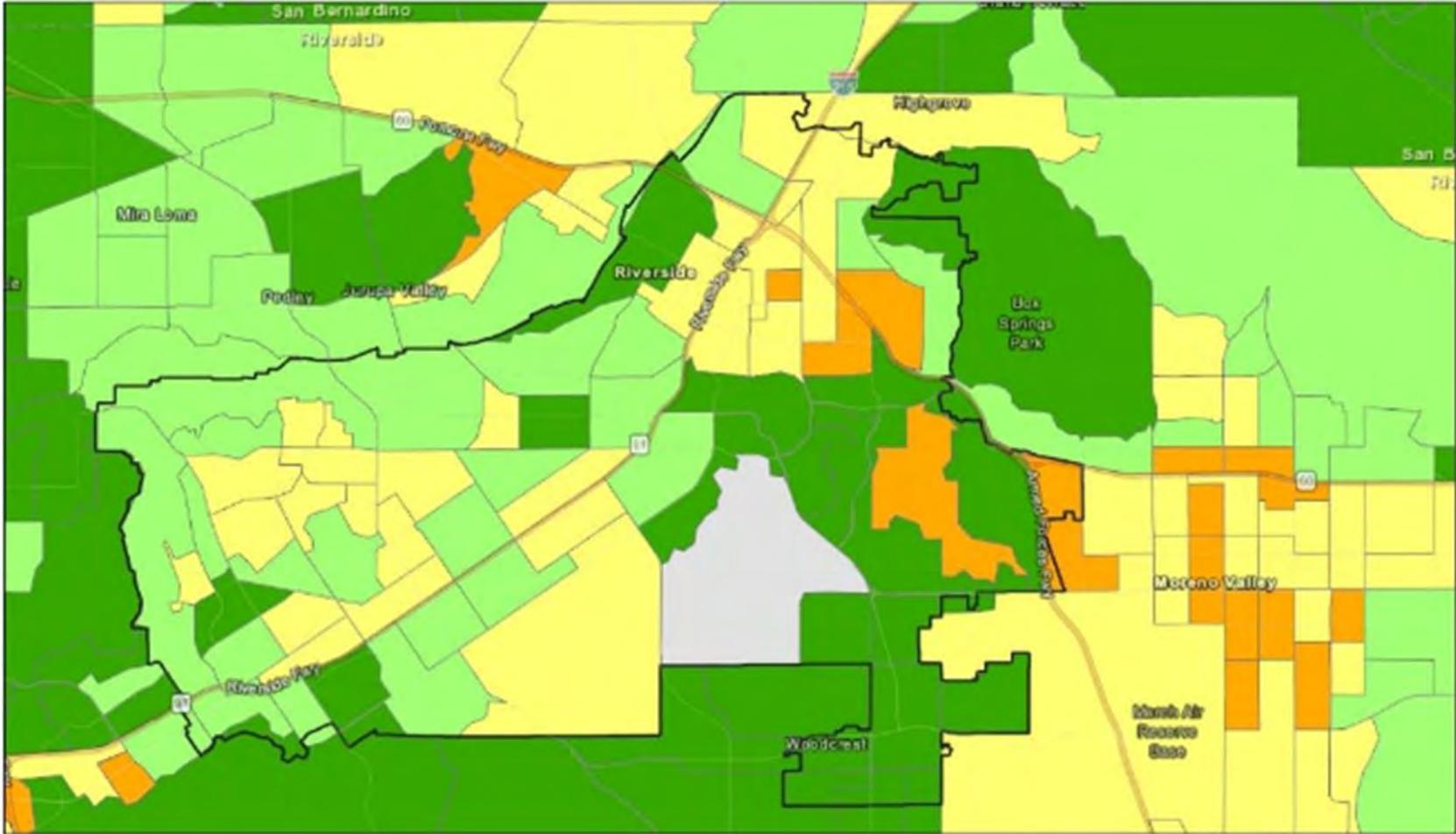
While these sectors pay around the average or above average wages compared to the city average wage, by the standards of the rest of the state, they pay quite modest wages. None of these three sectors pay wages higher than the State average. For wages to grow in the City of Riverside, its industrial base would need to transition into higher paying sectors.

There are two primary ways that economic indicators can improve in any location. The first is through educational attainment: better educated and skilled residents earn higher wages. The primary way in which a city can attract higher skilled workers is through improving local amenities and services, such as improving schools. The second is by nurturing the city's better-paying industries and attracting more of such industries, consistent with the city's job base. Better-paying industries can provide employment opportunities for local workers and enhance their ability to earn higher incomes. If the City of Riverside seeks to improve economic indicators in the community, it should focus its attention in these areas.

The San Bernardino County Workforce Development Board operates programs that are funded by the Department of Labor's Workforce Innovation and Opportunity Act. One of the programs is the America's Job Centers of California (AJCCs) that has three locations that serve portions of the In-land Empire. Strategies to meet the needs of local businesses and the workforce allows for employment opportunities for the region's residents.

The Riverside County Economic Development Agency (EDA) also works to help provide business expansion or help business relocate to Riverside County easier. The EDA has programs that help develop hiring criteria, advertise employee recruitment, screen and test applicants, and provide training programs for businesses in the community.

Figure AFFH-18 – TCAC Economic Opportunities



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- City/Town Boundaries
- (R) TCAC Opportunity Areas (2021) - Economic Score - Tract
- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)
- No Data

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 Data: HERE, NPS | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, ESRI | U.S. Census | PlaceWorks 2021, TCAC 2020 | PlaceWorks 2021, U.S. Department of Housing and Urban Development 2020 | Carto, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

TRANSPORTATION

All Transit, an online resource for transit connectivity, access and frequency data, explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to All Transit, the City of Riverside has a score of 5.2 out of 10, with a score of 10 being high connectivity, access to jobs and frequency of service. This is comparable to other Cities in the region who average a score of 4.8. This shows that the City's residents have difficulties accessing consistent and reliable transportation that is also affordable to them. The further away from the 91 freeway, the lower the overall transit score. In the northernmost portion of the City, where there is a high number of minority populations, the majority of the transit scores average at 2. Overall, the average household in the City has five transit routes within ½ mile of their home and 83,122 jobs accessible in a 30-minute trip.

Riverside County has an overall score of 3.3 which illustrates the low number of trips per week and the low number of jobs accessible to residents via transit. San Bernardino County has a score of 4.4. Both counties have about one percent of commuters use public transit according to the data presented in All Transit.

The pattern of low percentage of commuter utilizing public transit is consistent with the postwar suburban development that is characteristic of the Inland Empire. However, Riverside does have better transit access relative to a majority of the region, with perhaps the exception of the San Bernardino County communities along the Metrolink San Bernardino Line. Riverside contains High-Quality Transit Areas (HQTA) as defined by SCAG (transit areas within one half mile of a well-served transit stop or a transit corridor with 15 minute or less service frequency during peak commute hours), related primarily to RTA service on the Magnolia Avenue/Market Street/University Avenue corridor. This service as well as the City's three Metrolink stations add to the accessibility of transit.

ENVIRONMENTAL

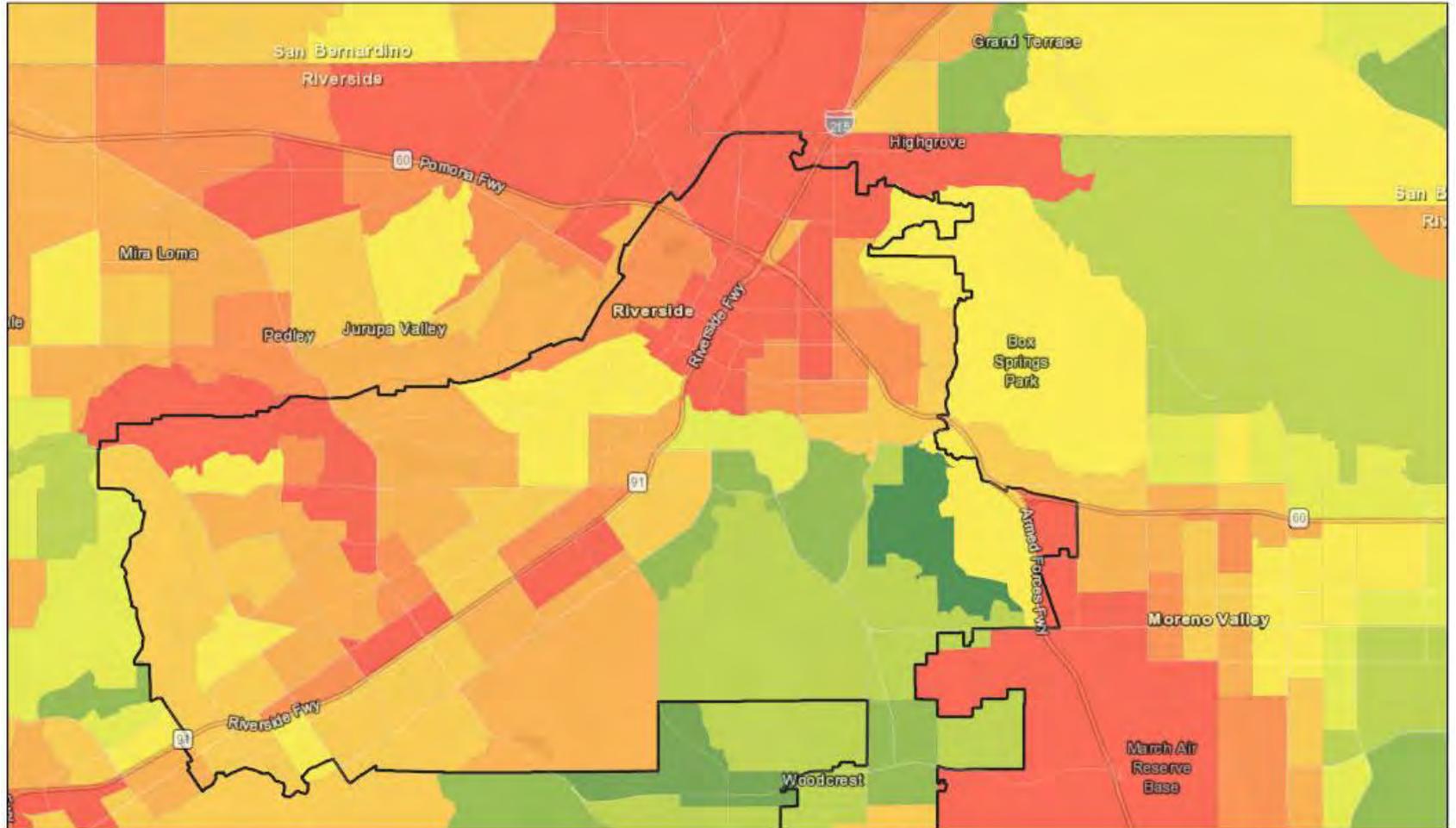
The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). High scoring census tracts tend to be more burdened by pollution from multiple sources and are most vulnerable to its effects, considering their socioeconomic characteristics and underlying health status.

In Riverside, most of the City is impacted by pollution and has high scoring census tracts as Figure AFFH-19- CalEnviroScreen - Riverside shows. The lowest scoring census tract is the open space of Sycamore Canyon Wilderness Park in the east-ern portion of the City, which has no population or housing units. Immediately surrounding Sycamore Canyon Wilderness Park are areas less affected by pollution, but this score is higher throughout the City. The areas with high scores do affect minority populations and areas of high percentage of non-white residents.

In the Inland Empire, a majority of the census tracts score very high on the CalEnviroScreen. In San Bernardino alone, most of the census tracts score within the 91-95 percentile or 96-100 percentile.

According to the American Lung Association (ALA) State of the Air Report, both San Bernardino and Riverside Counties score an F in the Ozone Grade. An F grade means that the county had nine more days than average of high air pollution levels. The ALA also calculates the county population at risk from these pollutants based on the population of the entire county where the monitor is located. The ALA then calculates the metropolitan population at risk based upon the largest metropolitan area that contains that county. Overall, the Inland Empire has an Ozone Grade of F because of the number of unhealthy air quality days and the risk populations take from the pollutants pre-sent. Because this is a regional tool, it can be assumed the issues affecting residents in the Inland Empire as a whole also affect Riverside residents.

Figure AFFH-19- CalEnviroScreen - Riverside



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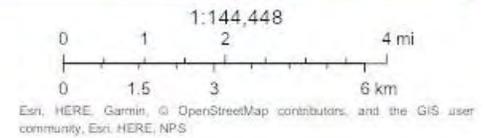
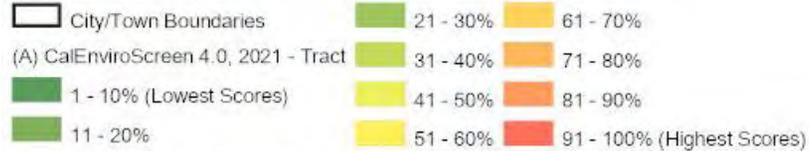
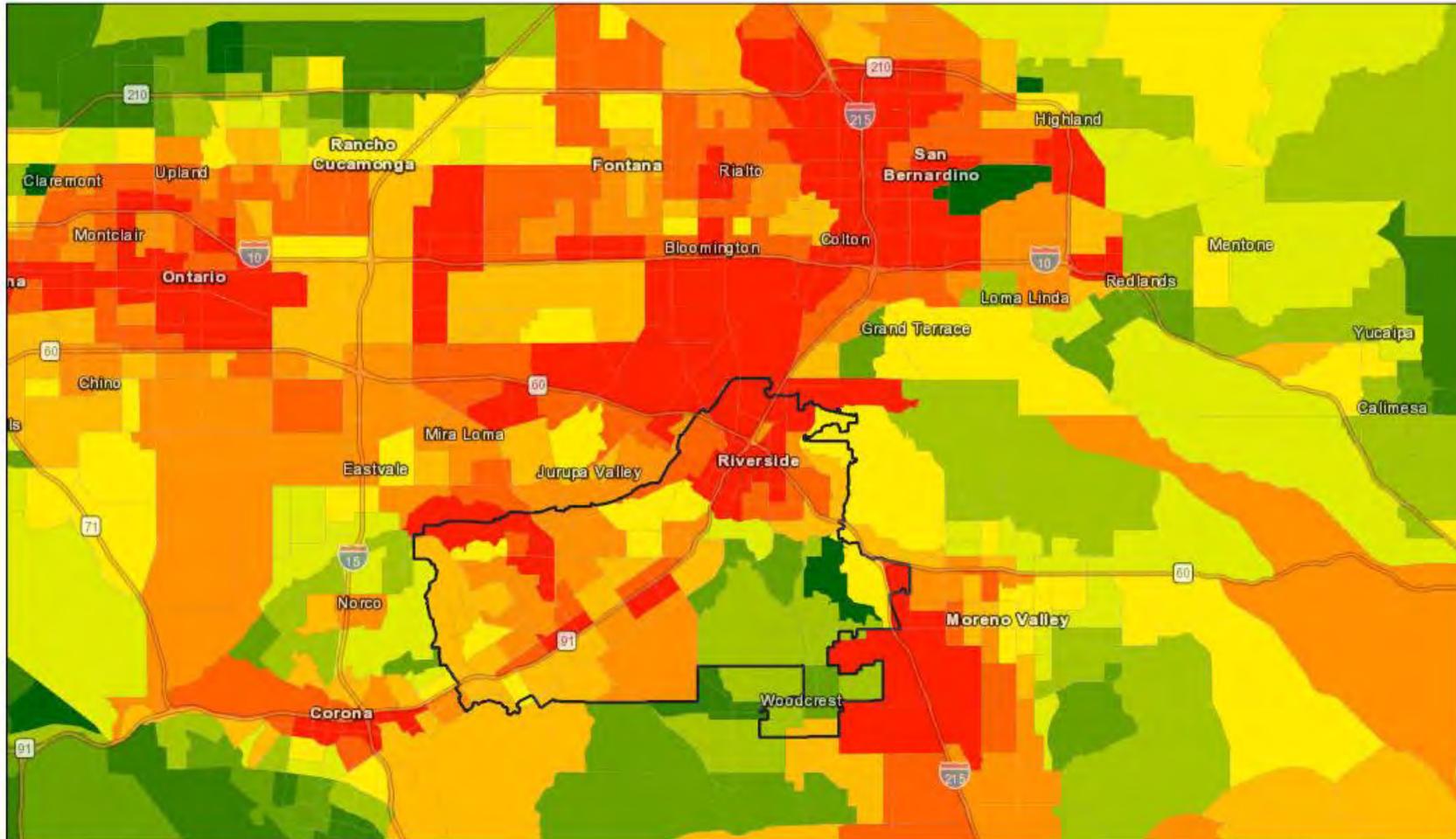


Figure AFFH-20 CalEnviroScreen in the Inland Empire



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City/Town Boundaries
 (A) CalEnviroScreen 4.0, 2021 - Tract
 1 - 10% (Lowest Scores)
 11 - 20%
 21 - 30%
 31 - 40%
 41 - 50%
 51 - 60%
 61 - 70%
 71 - 80%
 81 - 90%
 91 - 100% (Highest Scores)



CA HCD

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DISPROPORTIONATE HOUSING NEEDS

The AFFH Rule Guidebook defines “disproportionate housing needs” as a condition in which there are “significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geo-graphic area.” The analysis is completed by assessing cost burden, severe cost burden, over-crowding, and substandard housing.

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Riverside. Housing problems considered by CHAS include:

- Housing cost burden, including utilities, exceeding 30 percent of gross income;
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income;
- Overcrowded conditions (housing units with more than one person per room); and/or
- Units with physical defects (lacking complete kitchen or bathroom).

As shown in Table 3, a higher percent of Black (55.1 percent), White (54.5 percent), Pacific Is-lander (53.4 percent) and Hispanic (53.9 percent), and other non-white (55.3 percent) households experience housing problems compared to American Indian (51.9 percent), Asian (44.8 percent), and all City households (52.1 percent). While renter-households, independent of race, experience housing problems at higher rates than owner-occupied households, Black, American Indian, Hispanic, and other non-white renter-households experience housing problems at higher rates than White and Asian households.

Riverside households experience housing problems (52.1 percent) at slightly higher rates than the County overall (50.6 percent). Riverside non-white minority households also experience housing problems at higher rates than non-white County households. For example, approximately 55.3 percent of other non-white households in Riverside have housing problems, compared to 45.6 percent of County other non-white households.

Table AFFH-3 – Housing Problem by Tenure and Race

With Housing Problem	White	Black	Asian	American Indian	Pacific Islander	Hispanic	Other	All
Riverside								
Owner-Occupied	24.5%	37.1%	36.5%	11.9%	45.3%	39.8%	49.0%	35.0%
Renter-Occupied	53.7%	64.6%	55.1%	60.2%	55.9%	67.2%	60.2%	68.5%
All Households	54.5%	55.1%	44.8%	51.9%	53.4%	53.9%	55.3%	52.1%
Riverside County								
Owner-Occupied	30.8%	38.2%	38.5%	32.5%	36.0%	44.4%	37.5%	33.8%
Renter-Occupied	53.5%	65.7%	53.8%	66.4%	66.7%	65.6%	56.6%	75.2%
All Households	37.0%	52.6%	42.7%	50.1%	52.4%	53.5%	45.6%	50.6%

Source: HUD CHAS – 2013-2017

Elderly and large households may also be subject to disproportionate housing problems, whether it is affordability or adequate physical needs (number of rooms, complete facilities). Table 4 shows that renter elderly and large households experience housing problems at greater rates than all households in the City. Renters in both the City and the County experience housing problems at a greater rate than owners. However, a larger proportion of renter households in the City experience housing problems than all the County renter households, and vice versa for owner households.

COST BURDEN

A household is considered cost burdened if it spends more than 30 percent of its income in housing costs, including utilities. Similar to Any Housing Problem trends shown in Table AFFH-3 – Housing Problem by Tenure and Race, Black, American Indian, Hispanic, and non-white Other households experience cost burdens at higher rates than White households as Table-AFFH-5 – Cost Burden by Race shows. These racial minorities experience cost burdens at slightly higher rates in both the City and the County as compared to White households. Also, renters, regardless of race, experience cost burdens at higher rates than owners in both the City and County.

Riverside elderly and large households as a whole also experience cost burdens at slightly lower rates than the County, but renters of these groups experience cost burden at the highest rates. A majority of elderly renters in the City and County experience a cost burden (Table AFFH-6– Cost Burden for Elderly and Large Households).

Affordability could be a barrier to housing for persons with disabilities or special needs populations who rely on Supplemental Security Income as their primary source of income, which ranges from \$954 to \$1,776 monthly, depending on their qualifications. These households may experience cost burden when SSI incomes are not adequate to pay for rent and do not increase at rates comparable to rent increases.

The highest concentration of renter- and owner-households experiencing cost burdens are located in the northeastern and north census tracts within the City, with the most significant cost burden conditions occurring in the Arlington Heights neighborhood in the southern portion of the City as Figure AFFH-21 Overpayment by Renters and Figure AFFH-22 Overpayment by Homeowners show. Between 60 and 80 percent of renter households in most tracts in these areas experience housing cost burdens. These census tracts also have high minority concentrations (especially Hispanic) and low- and moderate-income households.

Table AFFH-4 – Housing Issues - Renters

With Housing Problem	Elderly	Large HH	All Renter	Elderly	Large HH	All Owners	All HH
Riverside	67.1%	79.0%	61.5%	31.0%	44.5%	32.1%	45.5%
Riverside County	62.9%	74.5%	60.3%	35.2%	45.1%	36.1%	44.6%

Source: HUD CHAS 2013-2017

Table AFFH-5 – Cost Burden by Race

Cost Burden >30%	White	Black	Asian	Am Ind	Pacific Islander	Hispanic	Other	All
Riverside								
Owner-Occupied	12.5%	17.5%	22.3%	6.2%	0.0%	16.2%	33.3%	14.9%
Renter-Occupied	54.6%	102.6%	95.5%	86.3%	72.2%	72.0%	91.7%	70.7%
All Households	23.4%	63.0%	46.0%	65.9%	50.0%	38.0%	62.9%	33.8%
Riverside County								
Owner-Occupied	20.6%	27.6%	28.4%	27.1%	16.8%	26.9%	26.0%	23.3%
Renter-Occupied	60.4%	88.3%	65.0%	100.0%	89.0%	74.0%	64.9%	69.4%
All Households	28.6%	53.5%	36.4%	56.0%	49.2%	42.7%	39.7%	35.5%

Source: HUD CHAS 2013-2017

Table AFFH-6– Cost Burden for Elderly and Large Households

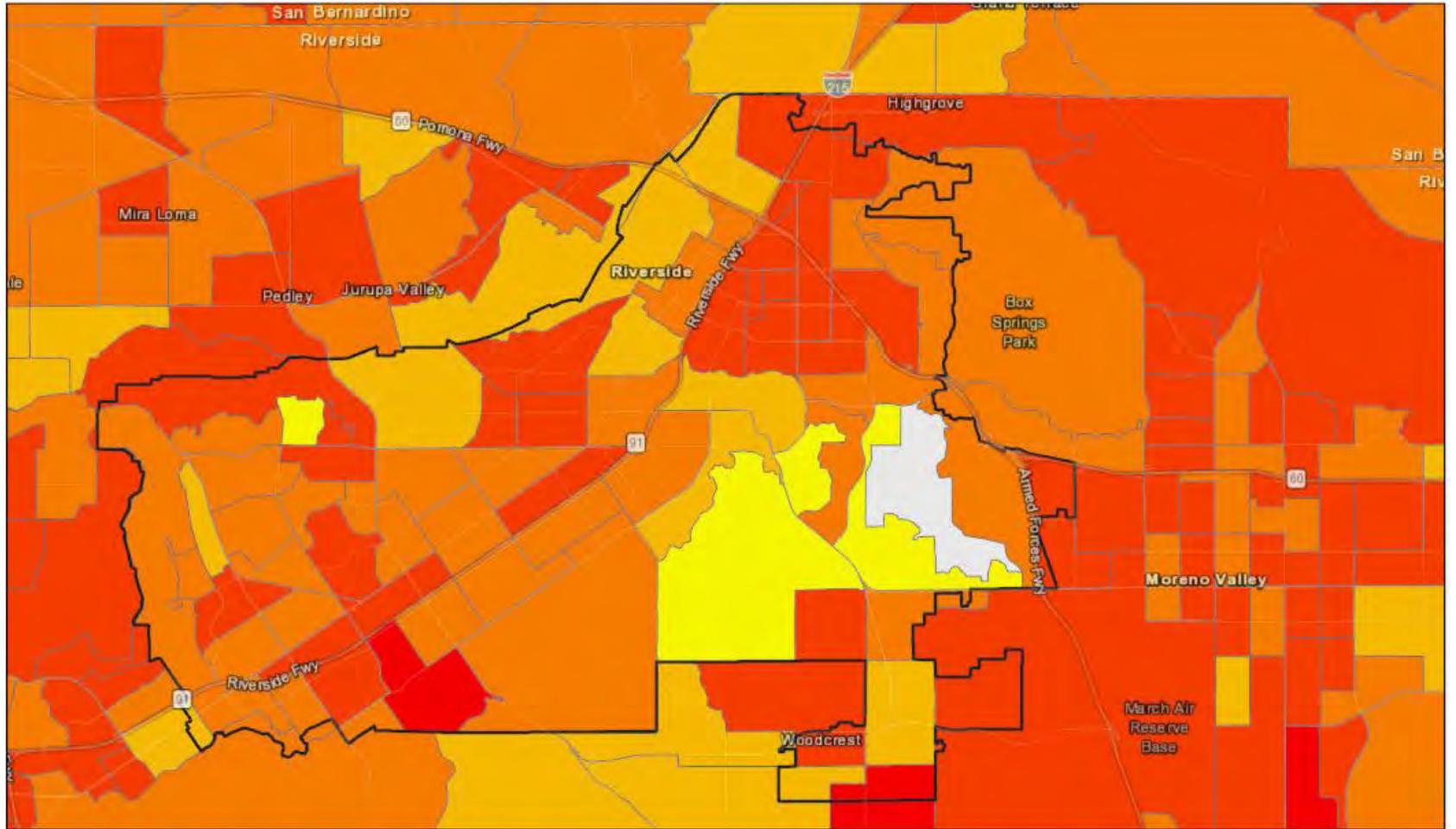
With Housing Problem	Elderly	Large HH	All Renter	Elderly	Large HH	All Owners	All HH
Riverside	92.2%	79.2%	83.2%	45.7%	34.0%	38.4%	58.9%
Riverside County	96.9%	79.2%	83.1%	52.6%	37.8%	47.0%	59.6%

Source: HUD CHAS 2013-2017

OVERCROWDING

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). According to the 2019 five-year ACS estimates, a higher percentage of households in Riverside (9.4 percent) are living in overcrowded conditions than the County (6.9 percent). In Riverside, census tracts with overcrowded households are concentrated in the north and north west of the City that are also areas of higher concentrations of racial/ethnic minorities, families with children, female-headed households with children, and LMI households. In the Inland Empire, over-crowded census tracts are concentrated north of Riverside, especially in San Bernardino.

Figure AFFH-21 Overpayment by Renters



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City/Town Boundaries

(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract

< 20%

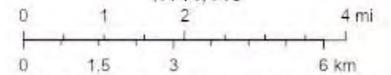
20% - 40%

40% - 60%

60% - 80%

> 80%

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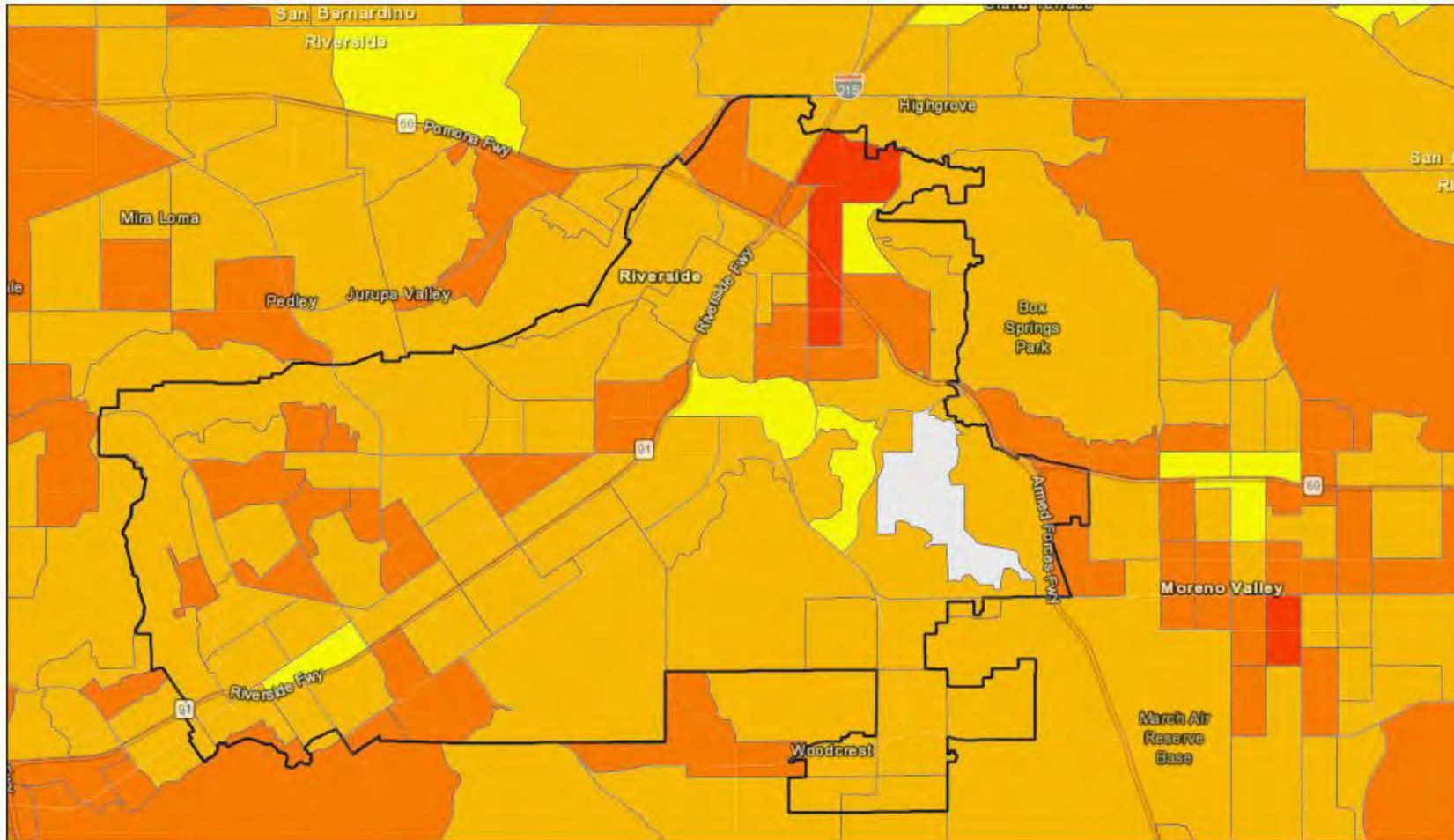


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CA HCD

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Figure AFFH-22 Overpayment by Homeowners



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City/Town Boundaries

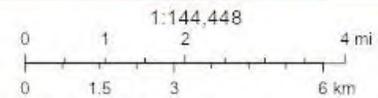
(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

< 20%

20% - 40%

40% - 60%

60% - 80%

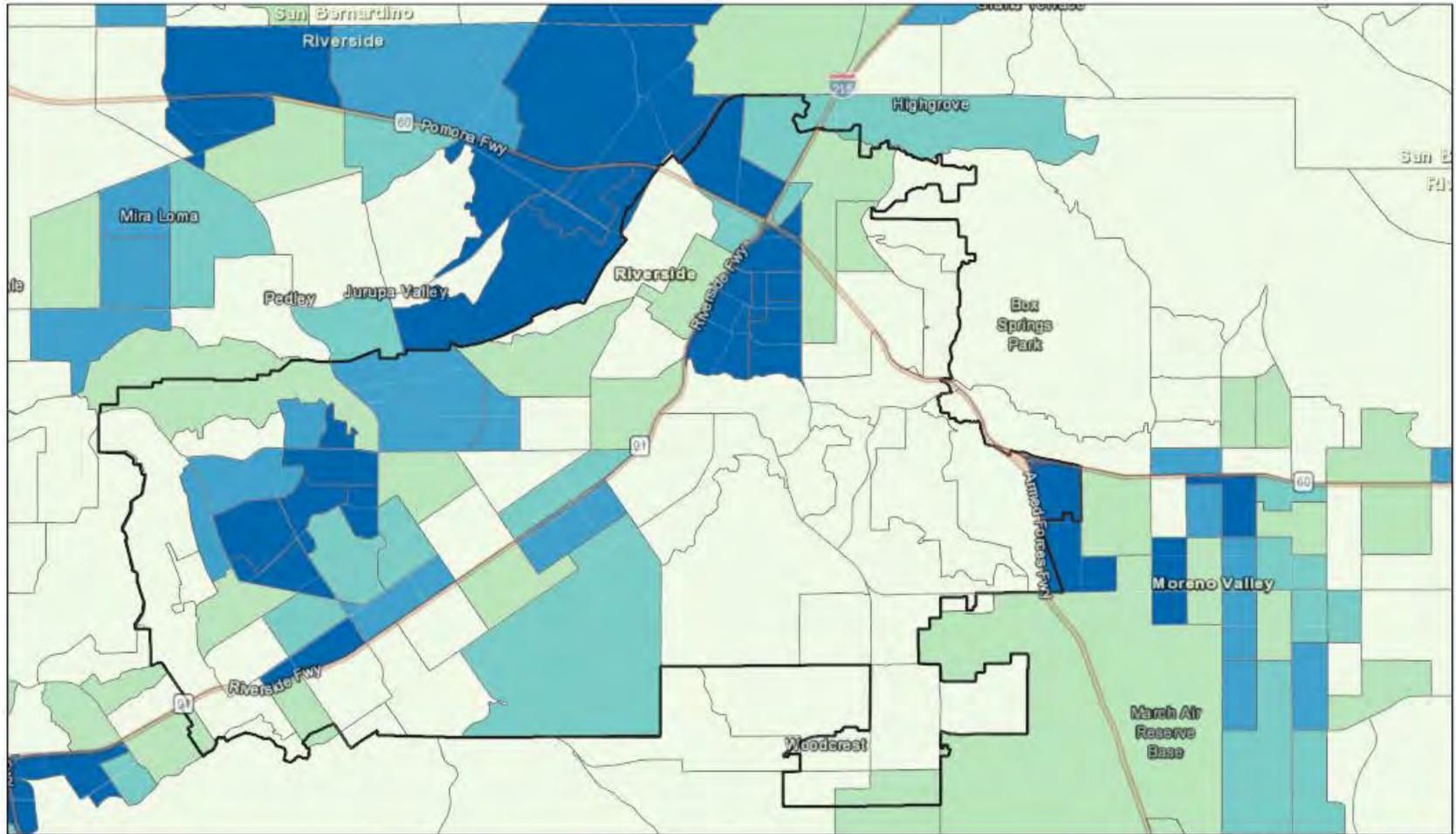


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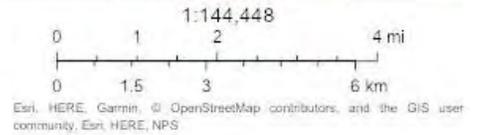
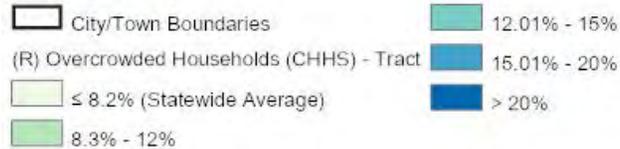
CA HCD

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Figure AFFH-23 – Overcrowded Households in Riverside



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DISPLACEMENT RISK

HCD defines sensitive communities as “communities [that] currently have populations vulnerable to displacement in the event of increased development or drastic shifts in housing cost.” The following characteristics define a vulnerable community:

- The share of very low-income residents is above 20%; and
- The tract meets two of the following criteria:
 - Share of renters is above 40%;
 - Share of people of color is above 50%;
 - Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the county median;
 - The community or areas in close proximity have been experiencing displacement pressures (percent change in rent above County median for rent increases); or
 - Difference between Census tract median rent and median rent for surrounding Census tracts above median for all tracts in the County (rent gap).

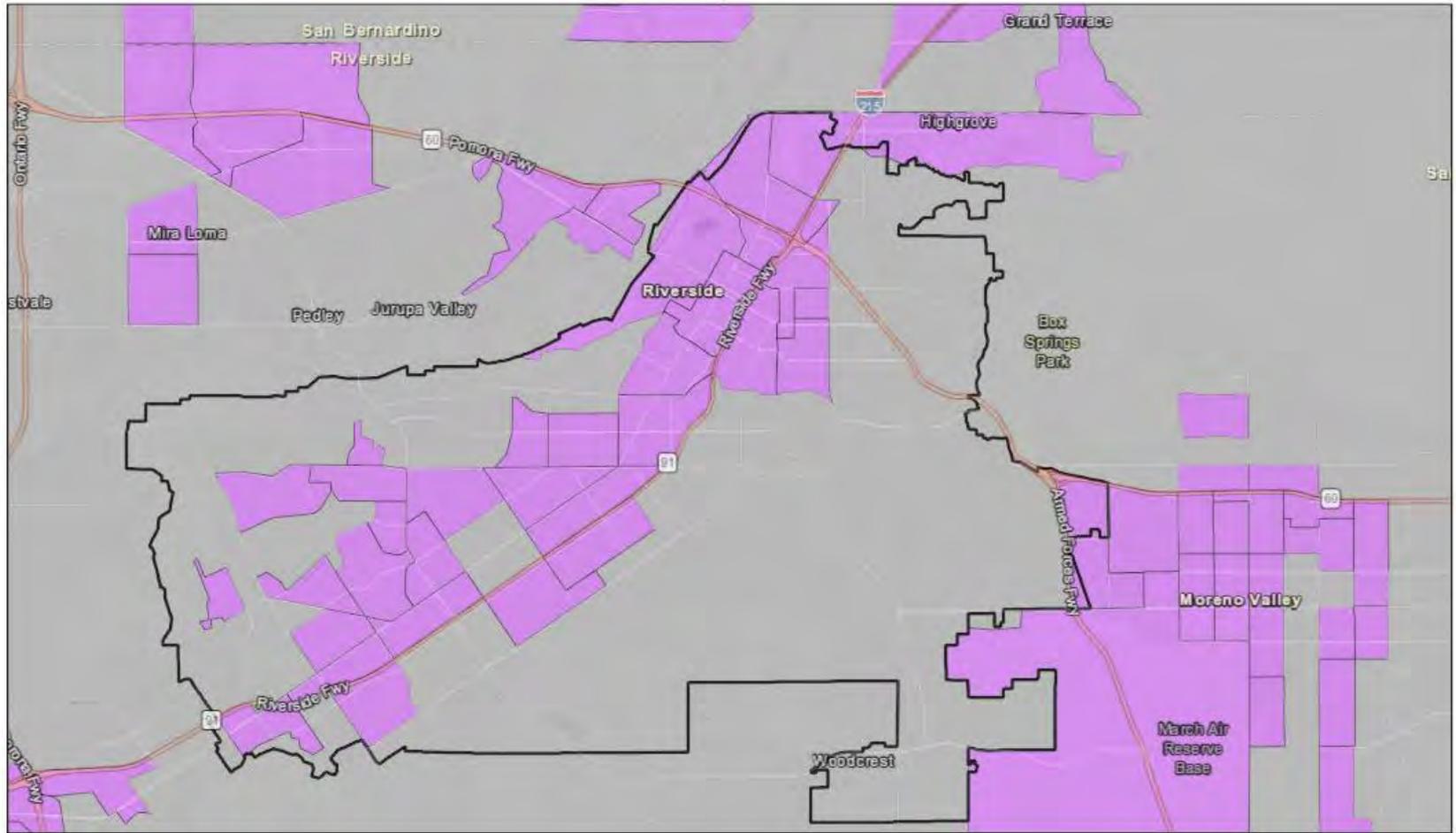
In Riverside, there are a number of census tracts identified as vulnerable communities. These communities are generally located along and north of the 91 freeway corridor and are the areas that meet some or most of the criteria above, especially the percentage of people of color. This is generally consistent with the historical development patterns of the city, which begin with its establishment in the Mile Square (now Downtown) area and outlying villages, including Casa Blanca and Arlington. These were originally isolated communities developed around citrus packinghouses and railroad depots established concurrently with the growth of the City’s citriculture industry at the turn of the 20th Century.

Over the following decades, as postwar suburban development—facilitated in part by the construction of what is now known as the 91 freeway—subsumed much of the City’s citrus industry, the City simultaneously grew its borders and its population. Communities closest to the major rail and roadway transportation corridors (i.e., Magnolia and Arlington Avenues) grew rapidly. Federal policies that prioritized and subsidized racially homogeneous suburban development, at the direct expense of more diverse, established urban neighborhoods, were a contributing factor to this pattern.

In the latter parts of the 20th Century, regional population growth pressure and the predominant convention of suburban expansion facilitated the development of outlying tract housing developments in the western and southeastern edges of the City. These areas absorbed a substantial amount of white, middle-class homeowners from coastal cities who found themselves priced out of single-family homeownership in suburban Los Angeles and Orange Counties. This helped to establish the latter-20th and early-21st century characterization of Riverside and surrounding Inland Empire cities as “bedroom” communities for a labor force largely tied to the coast, despite their long histories as independent economic centers of the Inland region.

These historical patterns are generally consistent with the distribution of displacement risk in the City, particularly as rapidly escalating housing costs across the Southern California send higher-earning households—and the concomitant speculation in urban real estate—in search of more affordable offerings further Inland, thereby increasing displacement risk to the established lower-income communities in Riverside.

Figure AFFH-25 Riverside Urban Displacement Vulnerability

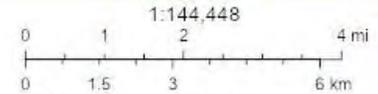


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City/Town Boundaries Other

(A) Sensitive Communities (UCB, Urban Displacement Project)

Vulnerable



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CA HCD

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SUMMARY OF FAIR HOUSING ISSUES

FINDINGS FROM THE CITY OF RIVERSIDE'S 2020 ANALYSIS OF IMPEDIMENTS

The City of Riverside's 2020 Analysis of Impediments to Fair Housing Choice concluded that the issues in Table 7 were impediments to Fair Housing.

Choice in the City, and recommended actions to fix these impediments. These recommendations have informed some of the Policies, Programs and Actions contained in Section HE-2 (Housing Policies & Programs) and AP-1 (Action Plan) of this Housing Element.

Table AFFH-7 – Summary of Impediments to Fair Housing Choice – Riverside 2020

Fair Housing Issue	Actions Needed by the City
Location of Affordable Family Rental Housing Developments	Identify vacant and non-vacant sites located in the highest and high resource neighborhoods Re-zone the most appropriate and suitable sites located in the highest and high resource neighborhoods to accommodate multifamily housing developments. Pursue place-based betterment strategies in the moderate and low resource neighborhoods
Demographics of Publicly Supported Housing	In FY 2020-2021, the FHCRC will work with the on-site property managers of LIHTC rental housing developments to develop and adopt affirmative marketing procedures If not done in the time frame, will reevaluate the development of the procedures
Population Diversity	In FY 2020-2021, the City will evaluate the contribution that the following actions could make toward reducing minority population concentrations and poverty: Place-based strategies in the neighborhoods with minority population concentrations and high poverty rates Development of affordable family apartment housing in high opportunity neighborhoods Development of market rate housing in neighborhoods with minority population concentrations
Housing Discrimination	During the five-year period from FY 2020-2021 through FY 2024-2025, the City will have the FHCRC provide fair housing services which will include the processing of housing discrimination complaints and landlord/tenant counseling services. Often a landlord/tenant issue has as its basis a housing discrimination concern. In FY 2020-2021, the FHCRC will develop in cooperation with the Community Access Center and Inland Regional Center actions to address the fair housing concerns of disabled persons.

Fair Housing Issue	Actions Needed by the City
Brokerage Services	<p>In FY 2020-2021 to FY 2024-2025, the FHCRC will:</p> <p>Participate in the meetings of IVAR’s Housing Committee</p> <p>Offer to teach the 3-hour Fair Housing course that REALTORS and salespersons must complete when they renew their license every four years</p>
Steering	<p>During the five-year period from FY 2020-2021 through FY 2024-2025, the FHCRC will provide at the first-time homebuyer workshops 1) examples of how to detect “steering” when using the internet to conduct a home search process and 2) examples of how to detect loan steering</p> <p>During the five-year period from FY 2020-2021 through FY 2024-2025, the FHCRC will provide information on how to detect steering behavior by resident property managers to renters attending workshops and Town Hall meetings</p> <p>In FY 2020-2021, the FHCRC will add a “steering” category to the categories of alleged housing discriminatory acts.</p>
Appraisal Practices	<p>In FY 2020-2021 to FY 2024-2025, the FHCRC will describe the appraisal process and the contents of an appraisal report at the First Time Homebuyer workshops.</p>
Lending Practices	<p>During the five-year period from FY 2020-2021 through FY 2024-2025, the FHCRC will provide at first-time home buyer workshops information on debt-to-income ratios that are acceptable to lenders. Implementation of this recommended action should result in better prepared borrowers and cause an increase in loan approval rates of all loan applicants, regardless of race or ethnicity.</p> <p>The FHCRC will annually monitor the disparity in loan denial rates between White, Non-Hispanic, and Black borrowers. If the disparity continues, the FHCRC will contact lenders to determine the causes of the loan denial disparities. The FHCRC also will conduct outreach to the Inland Valleys Association of REALTORS (IVAR) and Black REALTORS to craft initiatives to improve Black homeownership and reduce loan denial rates.</p>
Property Management Practices	<p>Continue to offer workshops and seminars to property managers and renters.</p> <p>In FY 2020-2021, the FHCRC will conduct a survey of 10-15 on-site property managers or property management companies to determine their familiarity with fair housing laws and requirements.</p> <p>In FY 2021-2022, the FHCRC will prepare model written property management policies that it will transmit to property management firms.</p>
Hate Crimes	<p>In FY 2020-2021 to FY 2024-2025, the City staff will review the California Department of Justice annual hate crime reports to ascertain if an action must be taken because of an increase in hate crime events. If an action is needed, it will be included in the Consolidated Plan Annual Action Plan.</p>

Fair Housing Issue	Actions Needed by the City
<p>Survey of Land Use And Zoning Regulations, Practices And Procedures</p>	<p>Define transitional and supportive housing by referencing the definitions in Government Code Sections 65582(f) and (g).</p> <p>Prepare a brochure and additional information promoting the Reasonable Accommodation Procedure.</p> <p>Conduct a survey of multifamily housing developments owned by the City's Housing Authority or financially assisted by the City to ensure management policies and practices affirmatively further fair housing.</p> <p>Amend the Zoning Code to define affordable senior housing as being restricted to residents 62 years of age or older.</p>

SUMMARY OF ADDITIONAL FAIR HOUSING CONCERNS

According to a report prepared by the FHCRC in 2021, the current environment has brought certain fair housing impediments to new levels. COVID-19 has completely changed the social, economic, and public landscape in Riverside, as is the case around the world. Vulnerable communities are facing the worst repercussions, including the risk of eviction and homelessness as a result of the pandemic. Affordable housing has always been a need in Riverside County, but now the impediments to fair, accessible housing for all have multiplied. The following impediments were identified and connect the scarcity of affordable housing in the City of Riverside to increased tension in landlord-tenant relationships, housing discrimination cases and general impediments to fair housing:

- Tight rental markets lead to little choice for tenants, particularly in low-cost housing, which means landlords and property managers have less incentive to address repair and habitability in their units.
- Tenants have little leverage when their rent increases, and if they are forced out due to rising costs, property managers have little trouble filling the units with new tenants because of high demand.
- Discrimination in tenant screening is more easily disguised when there are a large number of applicants and potential tenants for the limited pool of available units.
- Lack of affordable housing diminishes the number of units available to persons with disabilities and disincentivizes landlords taking reasonable accommodation seriously as disabled tenants that rely on SSDI are less likely to report ADA violations in fear of retaliation and inability to find an-other affordable unit with fixed incomes.
- The City of Riverside has many units set aside for student housing, which can compete for space with affordable housing and leading to month-to-month leases that offer fewer protections against rent increases shortly upon moving into a unit and no guarantee that they will be able to stay in the unit for the duration of their semester.
- Also, COVID-19 Related Impediments identified by the National Fair Housing Association have been identified if they are present in the City of Riverside and include:
- Disproportionate levels of eviction filings against persons in protected classes and the long-term impacts that will have on their rental records and creditworthiness.
- In the City of Riverside, discrimination complaints are now subordinate to inquiries about eviction notices, lease/rental terms, and rental assistance.
- Failure to accommodate people with disabilities who are at heightened risk of significant complications if exposed and infected with COVID-19 through showing of occupied units and failures to conduct maintenance safely.

- Discrimination against persons with disabilities are now the number one complaint logged by FHCR's counselors. As Baby Boomers are retiring, downsizing, and facing the health issues that come with age, multi-family properties are ill-equipped to comply with reasonable accommodation requirements. Landlords are also finding themselves short on cash for needed up-grades as their rental income decreases due to COVID-19.
- Disproportionate impact of severe over-crowding in housing which drives elevated COVID-19 transmissions, infections, and deaths.
- Rental rates are at an all-time high and the housing market continues to boom while those most likely to live in overcrowded conditions are losing their jobs in the service and restaurant industries.
- According to data from Redfin, the US Census Bureau and HUD, 46 percent of households in In-land Southern California are rent burdened, meaning they spend more than 30 percent of their in-come on housing. This is second only to the Northern California region in the state.
- Conservation of energy resources.

LOCAL DATA AND KNOWLEDGE

The areas of Riverside north of the 91/60/215 freeway corridors have a pattern of residential overcrowding and a prevalence of cost burden and overpayment by renter households. The same areas are shown to have concentrations of Hispanic populations, which make up 52.7 percent of the City's population. This group tends to have a high-er proportion of lower income, which may account for the disproportionate cost burdens in these areas.

OTHER CONTRIBUTIONS TO FAIR HOUSING

The City has also actively prioritized public infra-structure in low- and moderate-income areas by focusing most of its CDBG funds on creating a suitable living environment by investing funds in infrastructure and public services to improve the physical environment and residents' lives in the community. These public improvements encourage increased private-market investment in declining or deteriorating neighborhoods. Some of the goals presented on the City's website to accomplish with CDBG funds include:

- Improving the safety and livability of neighborhoods;
- Increasing access to quality public and private facilities and services;
- Reducing the isolation of income groups with-in areas through spatial de-concentration of housing opportunities for lower income per-sons and the revitalization of deteriorating neighborhoods;
- Restoring and preserving properties of special historic, architectural, or aesthetic value; and
- Conservation of energy resources.

SITES INVENTORY

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification requirement involves not only an analysis of site capacity to accommodate the RHNA (provided in Appendix A), but also whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. The following analysis serves to demonstrate how the identified Housing Opportunity Sites address this requirement.

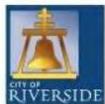
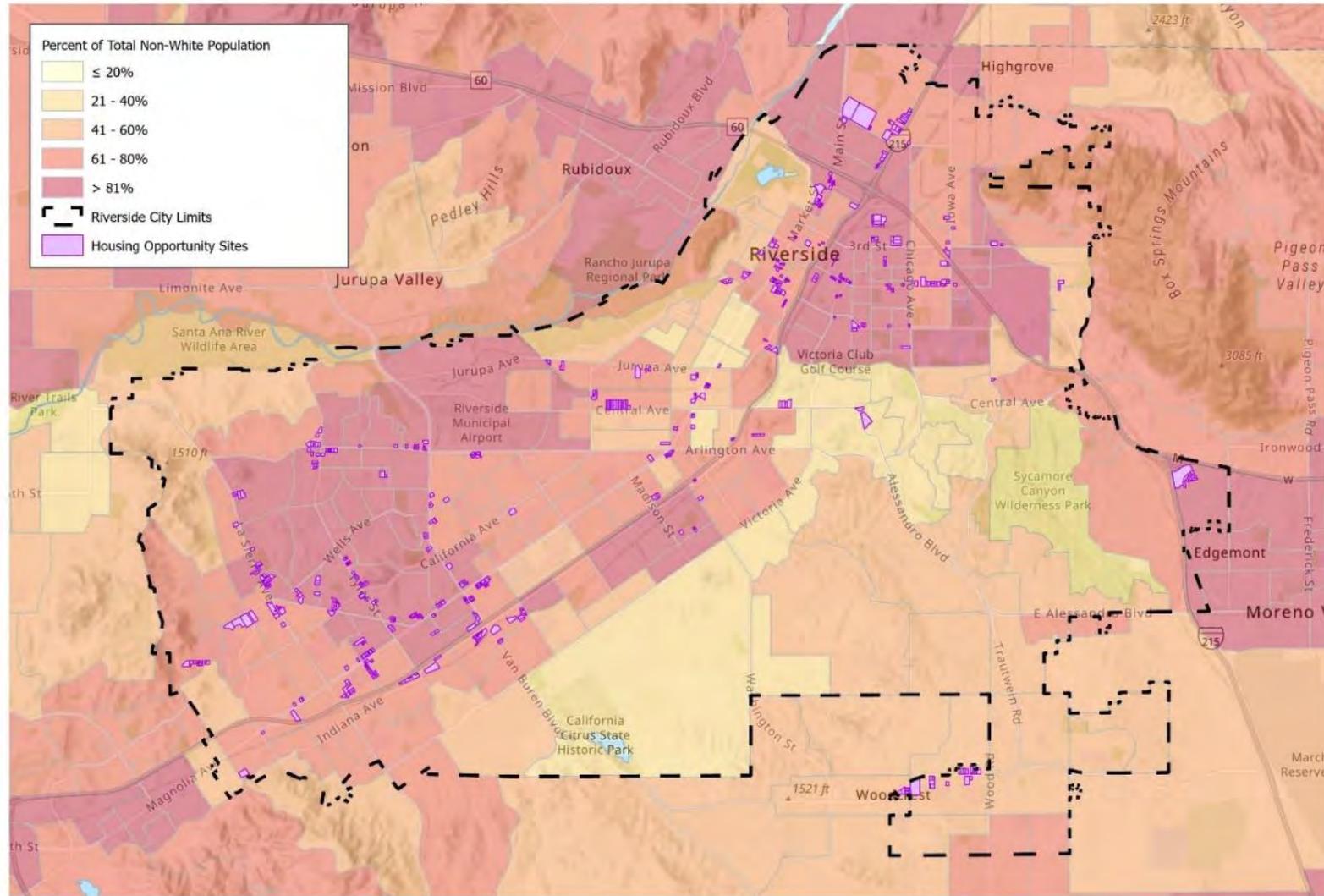
INTEGRATION AND SEGREGATION: RACE AND INCOME

The city of Riverside has a high concentration of population identifying as non-white. Figure AFFH-26-Opportunity Sites shows the proposed Opportunity Sites throughout the City in relation to areas within the City with a high percentage of non-white population. The increased housing development are located along the City's established transportation and commercial corridors, primarily Magnolia, Arlington and University Avenues and the surrounding areas. Due to the historical patterns of urban development in the City discussed previously, these areas also happen to be coincident with majority minority and lower-income populations. By contrast, the areas of the City demonstrating the highest proportion of both white and higher-income residents are primarily located in the southeastern portions of the City. These areas are constrained by multiple environmental factors as it relates to additional residential development, including but not limited to lack of access to transportation, exposure to wildfire risk, limitations on development related to proximity to March Air Reserve Base, and other factors described in TBR-3 (Housing Resources). Proposed opportunity sites the city has identified are predominantly in these concentration areas, with 82% of the housing.

Opportunity Sites parcels located in areas where at least 61% percent of the population identifies as non-white. This is primarily a function of two major factors in Opportunity Site identification: access to services and amenities, and environmental constraints. A majority of the urban services and amenities necessary to support

In the City, 24.7 percent of households have one or more persons with a disability. Figure AFFH-27-Opportunity Sites/Percentage of Population with Disabilities shows the proposed housing opportunity sites throughout the community in relation to areas of population with disabilities. Of housing opportunity sites parcels identified approximately 66% are located in areas where 10%-20% percent of the population identifies as being disabled which is the highest percentile range in the city.

Figure AFFH-26- Opportunity Sites



Opportunity Sites

Percentage of Population Non White

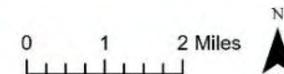
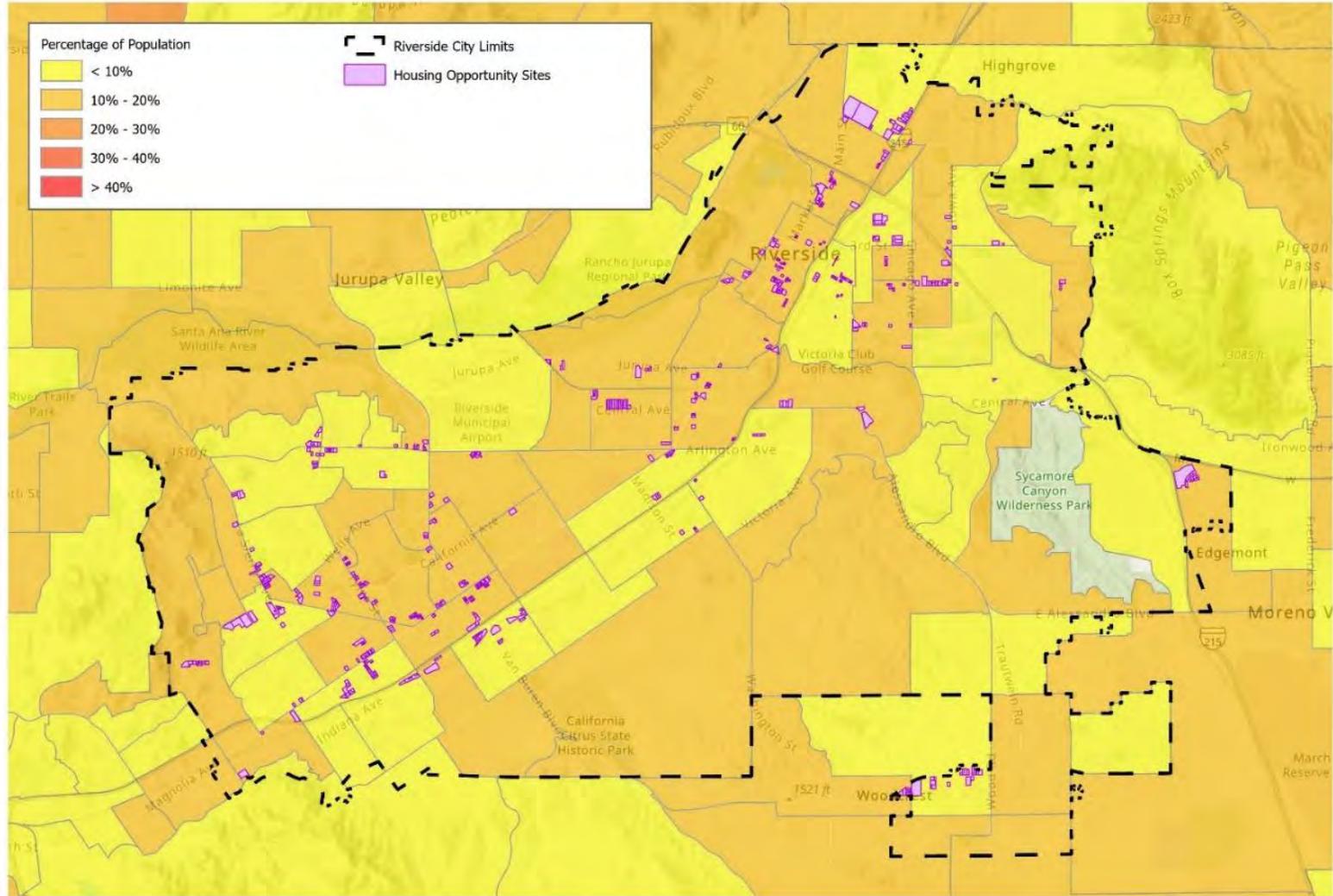


Figure AFFH-27- Opportunity Sites/Percentage of Population with Disabilities

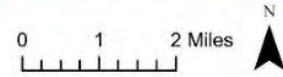


Technical Background Report:
AFFH Assessment



Opportunity Sites

Percentage of Population with Disabilities



RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY

The TCAC/HCD approach to calculating racially/ethnically concentrated areas of poverty (R/ECAPs), uses a location quotient for segregation and a poverty threshold of 30 percent of the population living below the poverty line. In Riverside, there are six areas in the City that are identified as racially/ethnically concentrated areas of poverty. Figure AFFH-28 – Opportunity Sites/TCAC Areas of High Segregation and Poverty shows that 17% of the housing opportunity sites parcels that are within these areas.

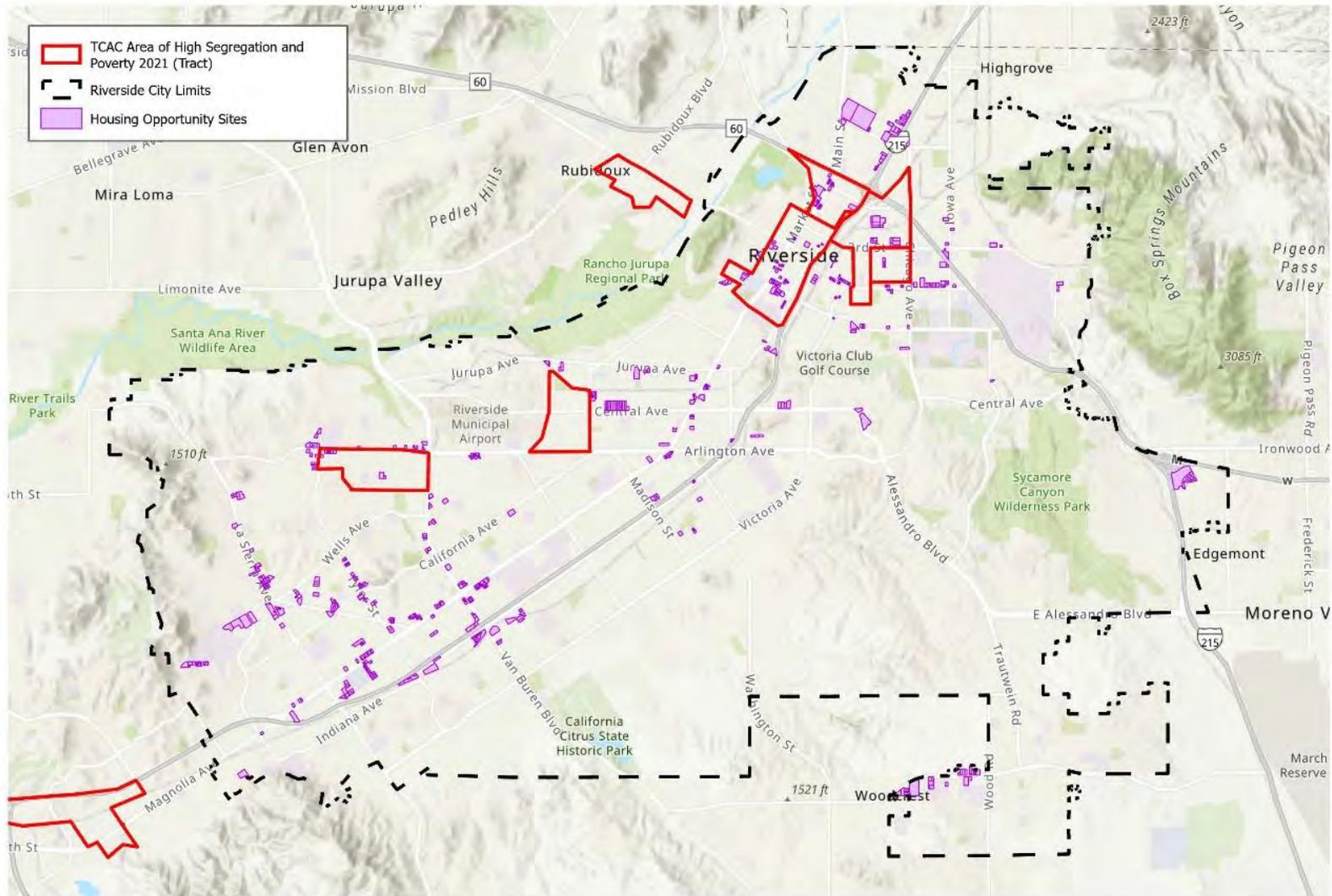
ACCESS TO OPPORTUNITY

Opportunity Indicators .TCAC and HCD developed the TCAC/HCD Opportunity Maps, a map-ping tool that identifies areas of higher and lower resources to evaluate access to opportunity. Figure 26 shows that 3% of the Housing Opportunity Sites are with the Highest Resource areas, 8% are in the High Resource areas, and 49% are in the Moderate Resource areas and 7% are in the Moderate Resource (Rapidly Changing) area. A total of 69% of the housing Opportunity Sites are in the Moderate to Highest Resource areas.

Environmental Factors. The California Office of Environmental Health Hazard Assessment (OEHHA) identifies California communities disproportionately burdened by multiple sources of pollution. High-scoring census tracts tend to be more burdened by pollution from multiple sources and are most vulnerable to its effects, considering their socioeconomic characteristics and underlying health status. The higher the percentage score, the higher the assumed burden. Figure AFFH-30– Opportunity Sites/CalEnviroScreen shows that 73% of the Housing Opportunity Sites are in the top three most burdened categories with scores between 71-100%. There are 24% of the sites that are within the 36-70% burden range and 4% that are located in the least burdened are-as of the city with scores in the 31-35% range. Redeveloping the sites in these areas would have a positive impact on these neighborhoods through the introduction of new economic opportunities; the introduction of new affordable housing options; providing new or refurbished infrastructure and public realm improvements; and providing new funding for services and amenities like schools through payment of development impact fees.

Disproportionate Housing Needs. Figure AFFH-31– Opportunity Sites/Low-Moderate Income shows that a majority of the proposed Opportunity Sites fall in the areas with the highest concentration of the population that are Low- and Moderate-income households. Approximately 70% of the Housing Opportunity Sites are in the areas identified as having more than 50% of the population in the low- or moderate-income range.

Figure AFFH-28 – Opportunity Sites/TCAC Areas of High Segregation and Poverty



Technical Background Report:
AFFH Assessment



Opportunity Sites

TCAC Areas of High Segregation and Poverty

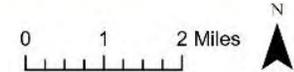


Figure AFFH-29- Opportunity Sites/TCAC Opportunity Areas



Opportunity Sites

TCAC Opportunity Areas 2021 - Composite (Tract)

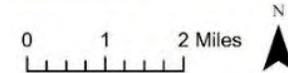
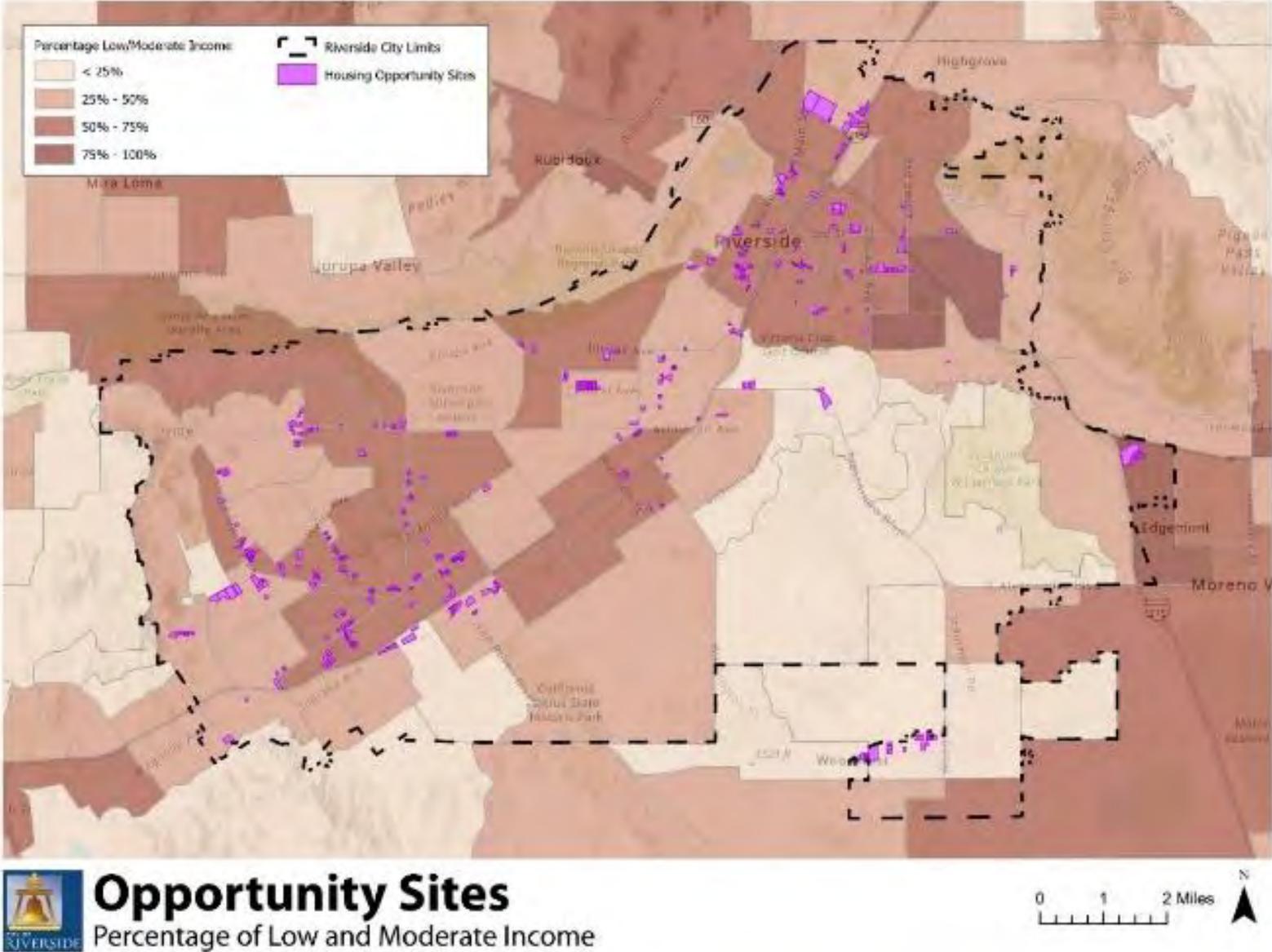


Figure AFFH-31- Opportunity Sites/Low-Moderate Income



IDENTIFICATION / PRIORITIZATION OF CONTRIBUTING FACTORS

The following are contributing factors that have been identified based on the fair housing issues presented in the City's Analysis of Impediments and the analysis in this document that affect fair housing choice in Riverside.

FAIR HOUSING ENFORCEMENT

Based on City staff experience in conducting community outreach for various planning and community development matters, expanded efforts are needed as it relates to Fair Housing enforcement.

Contributing Factors:

- Lack of a variety of inputs media (e.g., meetings, surveys, interviews)
- Lack of accessibility to draft documents
- Lack of digital access
- Lack of resources for fair housing agencies and organizations
- RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

The City has several census tracts that are identified as RE/CAPs.

Contributing Factors:

- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Location and type of affordable housing

DISPARITIES IN ACCESS TO OPPORTUNITY

There are areas in the City that have disparities in access to opportunities.

Contributing Factors:

- Access to equitable childcare
- Access to equitable healthcare
- The availability, type, frequency, and reliability of public transportation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Location and type of affordable housing
- Private discrimination

DISPARITIES IN ACCESS TO OPPORTUNITY FOR PERSONS WITH DISABILITIES

Overall, persons with disabilities have issues accessing resources and opportunities.

Contributing Factors:

- Access to publicly supported housing for persons with disabilities (Beyond ADA, or specific housing types?)
- Access to transportation for persons with disabilities
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing

DISPROPORTIONATE HOUSING NEEDS, INCLUDING DISPLACEMENT RISKS

There are many census tracts in the City that are defined as being vulnerable to displacement in the event of increased development or drastic shifts in housing cost. These census tracts are located along and north of the 91 freeway throughout the City.

Contributing Factors:

- The availability of affordable units in a range of sizes (such as lack of family housing)
- Displacement of residents due to economic pressures
- Land use and zoning laws
- Community opposition
- Lack of public investments in specific neighborhoods, including services or amenities

IMPLEMENTATION ACTIONS

Actions implement goals and consist of concrete steps, timelines and measurable outcomes. Pursuant to Government Code section 8899.50, these actions should be considered a part of the schedule of actions or programs required by Housing Element Law and must affirmatively further fair housing. Specifically, Government Code section 8899.50 requires “meaningful actions” well beyond combating discrimination to overcome patterns of segregation and foster inclusive communities. These actions, as a whole, must:

- Address significant disparities in housing needs and in access to opportunity;
- Replace segregated living patterns with truly integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws. Further, local agencies shall not take any action materially inconsistent with the obligation to affirmatively further fair housing. This requirement should apply to all actions in the housing element and the rest of the general plan as well as any actions, policies or practices outside of the general plan.

Affirmatively furthering fair housing means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities.”

Table AFFH-8- Fair Housing Issues and Contributing Factors lists the Fair Housing Issues and Contributing Factors that existing in the City of Riverside and outlines the Meaningful Actions to be taken. The Meaningful Actions listed in the table relate to the actions identified in the Riverside Action Plan.

Table AFFH-8- Fair Housing Issues and Contributing Factors

Fair Housing Issues	Contributing Factors	Meaningful Actions
Fair Housing Services Outreach and Enforcement	Lack of a variety of inputs media (e.g., meetings, surveys, interviews)	
	Lack of accessibility to draft documents	HE-3.2
	Lack of digital access	HE- 3.5
	Lack of resources for fair housing agencies and organizations	
Housing Mobility	The availability of affordable units in a range of sizes (such as lack of family housing)	HE-2.3
		HE-3.3
	Location and type of affordable housing	HE-3.4
	Private discrimination	HE-5.4
Place-Based Strategy to Encourage Community Revitalization		HE-6.4
		HE-1.5
		HE-4.1
		HE 6-3
	Lack of public investments in specific neighborhoods, including services or amenities	HE-EJ 7.1
	Lack of private investments in specific neighborhoods	HE-EJ 7.2
New Housing Choices in Areas of High Opportunity		HE-EJ 7.5
		HE-EJ 8.1
		HE-EJ 8.2
	Lack of public investments in specific neighborhoods, including services or amenities	HE-EJ 8.5
	Lack of private investments in specific neighborhoods	HE-1.1
		HE-5.1

Fair Housing Issues	Contributing Factors	Meaningful Actions
Housing for Persons with Disabilities	<ul style="list-style-type: none"> Access to publicly supported housing for persons with disabilities (Beyond ADA, or specific housing types?) Access to transportation for persons with disabilities Lack of affordable in-home or community-based supportive services Lack of affordable, accessible housing in range of unit sizes Lack of affordable, integrated housing for individuals who need supportive services Lack of assistance for housing accessibility modifications Lack of assistance for transitioning from institutional settings to integrated housing 	HE-3.3
Protecting Existing Residents from Displacement	<ul style="list-style-type: none"> The availability of affordable units in a range of sizes (such as lack of family housing) Displacement of residents due to economic pressures Land use and zoning laws Community opposition 	<ul style="list-style-type: none"> HE-3.1 HE-5.3
Community Health Strategies	<ul style="list-style-type: none"> Access to equitable childcare Access to equitable healthcare The availability, type, frequency, and reliability of public transportation Lack of private investments in specific neighborhoods Lack of public investments in specific neighborhoods, including services or amenities Location and type of affordable housing Private discrimination 	<ul style="list-style-type: none"> Actions: HE-1.5 HE-4.1 HE-6.3 HE-EJ 7.1 HE-EJ 7.2 HE-EJ 8.1 HE-EJ 8.2
Environmental Equity Strategies	<ul style="list-style-type: none"> Lack of public improvements Concentration of Environmental Hazards due to Industrial Uses Lack of basic services and inclusion in food deserts 	<ul style="list-style-type: none"> Actions: HE-EJ 8.1 HE-EJ 8.2