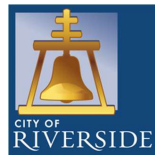


## City of Riverside

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# 2025 Analysis of Impediments to Fair Housing Choice



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# 1. Introduction

## 1.1 Purpose of the Report

The City of Riverside annually receives funds from the Federal Community Development Block Grant (CDBG) program and HOME Investments Partnerships Program (HOME). An Affirmatively Furthering Fair Housing (AFFH) certification is required of cities and counties that receive funds from these programs. The AFFH certification states that the grantee receiving HUD funds: "...will affirmatively further fair housing ... by conducting an analysis to identify impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of any impediments identified through the analysis, and maintaining records reflecting the analysis and actions in this regard."

HUD interprets the broad objectives of the requirement to affirmatively further fair housing choice to mean that recipients must:

- Analyze and eliminate housing discrimination in the jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability, and national origin;
- Promote housing that is structurally accessible to, and usable by, persons with disabilities; and
- Foster compliance with the nondiscrimination provisions of the Federal Fair Housing Act.

Therefore, the fundamental purpose of the Analysis of Impediments to Fair Housing Choice (AI) is to maintain the City of Riverside's compliance with the AFFH certification. In so doing, the City will promote fair housing and remove or mitigate the public and private sector impediments that have been identified through the analysis.

The time period of the AI is FY 2025-2026 through FY 2029-2030. The AI time period is intended to remain aligned with the City's 5-year Consolidated Plan.

## 1. Overview of HUD's Analysis of Impediments and AB 686 Requirements

Assembly Bill 686 (AB 686), signed in 2018, establishes an independent state mandate that expands the duty of all California's public agencies to affirmatively further fair housing (AFFH). AB 686 added to existing protections in California. With the passage of AB 686, state and local public agencies are required to affirmatively further fair housing through deliberate action to explicitly address, combat, and relieve disparities resulting from past and current patterns of segregation to foster more inclusive communities. Importantly, AB 686 also creates new housing element requirements applying to all housing elements due to be revised on or after January 1, 2021. These requirements include an assessment of fair housing practices, an analysis of the relationship between available sites and areas of high or low resources, and concrete actions in the form of programs to affirmatively further fair housing. Per AB 686, the City's 2021-2029 Housing Element contains programs to remediate fair housing issues found

in the analysis and further promote fair housing. The findings of the Housing Element's Assessment of Fair Housing are also incorporated into this AI.

## 1.2 Fair Housing Legal Framework

Fair housing is a right protected by Federal and State of California laws. Among these laws, virtually every housing unit in California is subject to fair housing practices.

### 1. Federal Laws

The Fair Housing Act of 1968 and the Fair Housing Amendments Act of 1988 (42 U.S. Code §§3601-3619, §3631) are federal fair housing laws that prohibit discrimination in all aspects of housing, including the sale, rental, lease, or negotiation for real property. The Fair Housing Act prohibits discrimination based on the following protected classes:

- Race or color
- Religion
- Sex
- Familial status
- National origin
- Disability (mental or physical)

Specifically, it is unlawful to:

- Refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, disability, familial status, or national origin.
- Discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, sex, disability, familial status, or national origin.
- Make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, religion, sex, disability, familial status, or national origin, or an intention to make any such preference, limitation, or discrimination.
- Represent to any person because of race, color, religion, sex, disability, familial status, or national origin that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.
- For profit, induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, disability, familial status, or national origin.

### *Reasonable Accommodations and Accessibility*

The Fair Housing Amendments Act requires owners of housing facilities to make “reasonable accommodations” (exceptions) in their rules, policies, and operations to give people with disabilities equal housing opportunities. For example, a landlord with a “no pets” policy may be required to grant an exception to this rule and allow an individual who is blind to keep a guide dog in the residence. The Fair Housing Act also requires landlords to allow tenants with disabilities to make reasonable access-related modifications to their private living space, as well as to common use spaces, at the tenant’s own expense. Finally, the Act requires that new multi-family housing with four or more units be designed and built to allow access for persons with disabilities. This includes accessible common use areas, doors that are wide enough for wheelchairs, kitchens and bathrooms that allow a person using a wheelchair to maneuver, and other adaptable features within the units.

### *HUD Final Rule on Equal Access to Housing in HUD Programs*

On March 5, 2012, the U.S. Department of Housing and Urban Development (HUD) published the Final Rule on “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity.” It applies to all McKinney-Vento-funded homeless programs, as well as to permanent housing assisted or insured by HUD. The rule creates a new regulatory provision that generally prohibits considering a person’s marital status, sexual orientation, or gender identity (a person’s internal sense of being male or female) in making homeless housing assistance available.

## **2. California Laws**

The California Civil Rights Department (CRD), formerly known as the Department of Fair Employment and Housing (DFEH), enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The **Fair Employment and Housing Act** (FEHA) (Government Code §12955 et seq.) prohibits discrimination and harassment in housing practices, including:

- Advertising
- Application and selection process
- Unlawful evictions
- Terms and conditions of tenancy
- Privileges of occupancy
- Mortgage loans and insurance
- Public and private land use practices (zoning)
- Unlawful restrictive covenants

The following categories are protected by FEHA:

- Race or color
- Ancestry or national origin
- Sex
- Marital status
- Source of income

- Sexual orientation
- Gender identity/expression
- Genetic information
- Familial status (households with children under 18 years of age)
- Religion
- Mental/physical disability
- Medical condition
- Age

In addition, the FEHA contains similar reasonable accommodations and accessibility provisions as the federal Fair Housing Amendments Act.

The **Unruh Civil Rights Act** provides protection from discrimination by all business establishments in California, including housing and accommodations, because of age, ancestry, color, disability, national origin, race, religion, sex, and sexual orientation. While the Unruh Civil Rights Act specifically lists “sex, race, color, religion, ancestry, national origin, disability, and medical condition” as protected classes, the California Supreme Court has held that protections under the Unruh Act are not necessarily restricted to these characteristics.

Furthermore, the **Ralph Civil Rights Act** (California Civil Code §51.7) forbids acts of violence or threats of violence because of a person’s race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political affiliation, or position in a labor dispute. Hate violence can be verbal or written threats; physical assault or attempted assault; and graffiti, vandalism, or property damage.

The **Bane Civil Rights Act** (California Civil Code §52.1) provides another layer of protection for fair housing choice by protecting all people in California from interference by force or threat of force with an individual’s constitutional or statutory rights, including a right to equal access to housing. The Bane Act also includes criminal penalties for hate crimes; however, convictions under the Act are not allowed for speech alone unless that speech itself threatened violence.

And, finally, **California Civil Code §1940.3** prohibits landlords from questioning potential residents about their immigration or citizenship status. Landlords in most states are free to inquire about a potential tenant’s immigration status and to reject applicants who are in the United States illegally. In addition, this law forbids local jurisdictions from passing laws that direct landlords to make inquiries about a person’s citizenship or immigration status.

In addition to these acts, **Government Code §11135, §65008, and §§65580-65589.8** prohibit discrimination in programs funded by the State and in any land use decisions. Specifically, recent changes to §§65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including permanent supportive housing for the disabled and housing for the homeless.

In 2019, the State passed SB 329 and SB 222, expanding the source of income protection. Under SB 329 and SB 222, all landlords in California will be required to accept Section 8 and VASH vouchers and other forms of rental assistance and to consider them as part of an

applicant's income. Both went into effect on January 1, 2020. In addition, AB 1482 was passed in 2019 to establish a cap on annual rent increase at 5 percent plus inflation and to enumerate the just causes to evict a tenant.

### 3. Fair Housing Defined

In light of the various pieces of fair housing legislation passed at the Federal and State levels, fair housing throughout this report is defined as follows:

A condition in which individuals of **similar income levels** in the same housing market have a like range of choice available to them regardless of their characteristics as protected under State and Federal laws.

#### *Housing Issues, Affordability, and Fair Housing*

HUD's Office of Fair Housing and Equal Opportunity (FHEO) draws a distinction between housing affordability and fair housing. Economic factors that affect a household's housing choices are not fair housing issues per se. Only when the relationship between household income, household type, race/ethnicity, and other factors create misconceptions, biases, and differential treatments would fair housing concerns arise.

Tenant/landlord disputes are also typically not related to fair housing. Most disputes between tenants and landlords result from a lack of understanding by either or both parties on their rights and responsibilities. Tenant/landlord disputes and housing discrimination cross paths when the disputes are based on factors protected by fair housing laws and result in differential treatment.

### 4. Fair Housing Impediments

Within the legal framework of Federal and State laws, and based on the guidance provided by HUD's Fair Housing Planning Guide, impediments to fair housing choice can be defined as:

- Any actions, omissions, or decisions taken because of the characteristics protected under State and Federal laws, which restrict housing choices or the availability of housing choices; or
- Any actions, omissions or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of characteristics protected under State and Federal laws.

To affirmatively promote equal housing opportunity, a community must work to remove impediments to fair housing choice. Furthermore, eligibility for certain federal funds requires compliance with federal fair housing laws. Specifically, to receive HUD Community Planning and Development (CPD) formula grants, a jurisdiction must:

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

### 1.3 Lead Agency

The lead agency for preparation of the *AI and Fair Housing Action Plan* is the Community and Economic Development Department/CDBG & Grants Division.



## 2. Community Engagement in AI Process

The City conducted a number of outreach activities to solicit input on fair housing issues from the community. Appendix A provides documentation of these outreach activities.

### 2.1 Stakeholder Involvement

The City conducted two virtual stakeholder meetings to receive input on fair housing issues:

- Monday, October 7, 2024
- Wednesday, October 9, 2024

About 30 agencies that serve the housing and supportive needs of Riverside residents were invited to attend the meetings. The following agencies attended the meetings:

- Family Promise
- Housing Authority of the City of Riverside
- Housing Authority of the County of Riverside
- Fair Housing Council of Riverside County

The key challenges in Riverside are available and affordable housing options for lower income households. Black and Hispanic persons are disproportionately impacted by homelessness. Regarding housing discrimination, the trends of discriminating based on race/color and disability continue. Reaching owners of small rental properties continues to be an issue. These owners are less likely to be aware of fair housing laws.

### 2.2 Survey

In conjunction with the Consolidated Plan development, the City conducted a fair housing survey, which was available online. However, only 15 responses were received. About half of the respondents were minority (Hispanic and Black). Of the 15 responses, two reported having experienced housing discrimination, claiming the following bases of discrimination: disability/medical conditions; family status; and source of income. In addition, a few respondents, while not specifically indicating they had experienced housing discrimination, did comment on having been denied reasonable accommodation. For those respondents who indicated fair housing issues, most did not report the incidents due to fear of retaliation or they did not believe it would make any difference.

## 3. Community Profile

### 3.1 Regional Setting

HUD's 1996 Fair Housing Planning Guide advises grantees to include in the AI "jurisdictional background data": demographics, income, employment, housing profile and other relevant data.

Not only does Riverside possess a rich variety of neighborhoods and a large and diverse housing stock, but the City also is a regional hub for higher education, technology, commerce, law, finance, and culture. Riverside benefits from excellent freeway and rail access, high-speed fiber-optic telecommunications, reasonable land and building costs, City-owned electrical and water systems, and a large general aviation airport.

Riverside is home to the Fair Housing Council of Riverside County, Inc. and the Civil Rights Institute of Inland Southern California, as well as affordable housing developers such as Habitat for Humanity and the Riverside Housing Development Corporation, and community resource providers such as the Community Access Center.

Founded in the early 1870s, Riverside is now the most populous city in the Inland Empire and the 12<sup>th</sup> most populous city in California. It is located approximately 60 miles from the City of Los Angeles. Although the community's residents take pride in their City as a whole, 28 distinct neighborhoods are the fundamental building blocks of the community. With only a few exceptions, all of Riverside's neighborhoods include areas for living, working, education, and cultural activities, and personal attachments to neighborhoods are very evident.

### 3.2 Socioeconomic Setting

#### 1. Demographic Profile

##### *Population Growth*

Riverside is the largest city and the cultural, civic and economic heart of the Inland Southern California region, located approximately 60 miles east of Los Angeles. With a population of 316,690, Riverside is the 59<sup>th</sup> largest city in the United States, the 12<sup>th</sup> largest in California, and the 6<sup>th</sup> largest in Southern California.

Between 2010 and 2020, the County of Riverside saw a significant population increase of 10 percent. The City of Riverside and most neighboring cities saw more gradual population growth ranging from 2 percent to 5 percent. Between 2020 and 2024, the County saw a slower growth rate of only 1 percent. The cities of Riverside, Jurupa Valley, and Moreno Valley experienced slight decreases in population (0.3 percent, 0.1 percent, and 0.4 percent, respectively), while Norco had a significant decrease in population of 5.9 percent. This

declining trend was seen statewide as California’s population dropped for the first time in 2023 since gaining statehood in 1850.<sup>1</sup>

Table 1: Population Growth (2010-2024)					
Jurisdiction	2010	2020	2024	Growth Rate	
				2010-2020	2020-2024
Riverside	303,871	317,624	316,690	4.5%	-0.3%
Corona	152,374	156,670	156,615	2.8%	0.0%
Jurupa Valley	–	104,801	104,721	–	-0.1%
Moreno Valley	193,365	208,069	207,146	7.6%	-0.4%
Norco	27,063	26,628	25,068	-1.6%	-5.9%
Perris	68,386	78,550	79,311	14.9%	1.0%
Riverside County	2,189,641	2,418,185	2,442,378	10.4%	1.0%
Note: Jurupa Valley was incorporated in 2011.					
Sources: Bureau of the Census, 2010-Census; State Department of Finance Population and Housing Estimates, 2020, 2024.					

Age Characteristics

Housing demand is affected by the age characteristics of a community, among other factors. Traditionally, young adults prefer apartments, condominiums, and smaller single-family homes that are affordable. Middle-aged adults typically prefer larger homes as they begin to raise families. However, as children leave home, seniors often prefer smaller, moderate-cost condominiums and single-family homes with less extensive maintenance needs. In recent years, the escalating housing prices in Southern California have meant that many young families find it increasingly difficult to find adequately sized homes at affordable prices.

Age and fair housing intersect when managers or property owners make housing decisions based on the age of residents. For example, managers and property owners may prefer to rent to mature residents, limit the number of children in their complex, or discourage older residents due to their disabilities. While a housing provider may establish reasonable occupancy limits and set reasonable rules about the behavior of tenants, those rules cannot single out children for restrictions that do not apply also to adults.

Table 2 shows age characteristics for the City of Riverside from 2000 to 2022. The American Community Survey (ACS) data indicates that the City’s population is aging, consistent with trends throughout the State and the nation. The 2022 ACS estimates show that 21 percent of the City population is 55 or older and 38 percent is 24 or younger. In comparison, 15 percent of the population was 55 or older and 43 percent was 24 or younger reported by the 2000 U.S. Census.

<sup>1</sup> Johnson, H., McGhee, E., Subramaniam, C., and Hsieh, V. (October 2023). What’s Behind California’s Recent Population Decline—and Why It Matters. Public Policy Institute of California. Accessed April 4, 2024. <https://www.ppic.org/publication/whats-behind-californias-recent-population-decline-and-why-it-matters/>.

Table 2: Age Characteristics – City of Riverside (2000-2022)						
Age Group (Years)	2000		2010		2022	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
<5	19,709	7.7%	23,702	7.9%	18,454	5.8%
5-14	44,856	17.6%	44,800	14.9%	42,693	13.5%
15-24	44,339	17.4%	58,332	19.4%	58,632	18.5%
25-34	37,071	14.5%	44,476	14.8%	49,516	15.7%
35-44	40,410	15.8%	41,366	13.8%	42,814	13.5%
45-54	29,793	11.7%	39,340	13.1%	36,855	11.7%
55-64	16,355	6.4%	23,531	7.8%	31,508	10.0%
65+	22,560	8.8%	25,006	8.3%	35,604	11.3%
Total	255,093	100.0%	300,553	100.0%	316,076	100.0%

Sources: Bureau of the Census, 2000 Census; 2006-2010 and 2018-2022 American Community Survey (ACS).

### Race and Ethnic Characteristics

Since 2000, the Hispanic/Latino population in Riverside has seen continuous growth, representing 55 percent of the City population in 2022 from only 38 percent in 2000 (see **Table 3**). During this period, the White population saw an inverse trend, representing 46 percent of the population in 2000 and 27 percent in 2022. Currently, the Asian population represents the third largest racial/ethnic group in the City (8 percent), followed by the Black/African American population (5 percent).

Patterns of racial/ethnic segregation, including trends related to access to opportunities and disproportionate housing needs, are further discussed in Chapter 7, Private and Public Sector Fair Housing Impediments Analysis, of this Analysis of Impediments to Fair Housing Choice.

Table 3: Race and Ethnicity – City of Riverside (2000-2022)						
Race/Ethnicity	2000		2010		2022	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Hispanic/Latino	97,315	38.1%	148,953	49.0%	174,987	55.4%
White	116,254	45.6%	103,398	34.0%	86,337	27.3%
Black/African American	18,051	7.1%	19,917	6.6%	17,060	5.4%
American Indian/Alaska Native	1,415	0.6%	1,297	0.4%	767	0.2%
Asian	14,233	5.6%	21,934	7.2%	25,932	8.2%
Native Hawaiian/Other Pacific Islander	848	0.3%	1,019	0.3%	973	0.3%
Other	492	0.2%	617	0.2%	552	0.2%
Two or more races	6,558	2.6%	6,736	2.2%	9,468	3.0%
Total	255,166	100.0%	303,871	100.0%	316,076	100.0%

Sources: Bureau of the Census, 2000-2010 Census; 2018-2022 American Community Survey (ACS).

Reflective of the demographics in the City, 46 percent of Riverside residents speak languages other than English at home, according to 2018-2022 ACS estimates. Spanish is the most prevalent non-English language, with around 37 percent of the population over 5 years old speaking Spanish at home. As presented in **Table 4**, 33 percent of Spanish speakers speak English less than “very well.” Asian and Pacific Islander language speakers have the largest

proportion of persons who speak English less than “very well” of 42 percent. According to the 2018-2022 ACS estimates, the top five languages spoken by people that are linguistically isolated (speak English less than “very well”) are Spanish (36,222 persons), other Indo-European languages (2,074 persons), Chinese (2,004 persons), Vietnamese (1,929 persons), and Tagalog (1,113 persons).

Table 4: English Language Ability – City of Riverside (2022)								
Language Ability	Asian and Pacific Islander		Spanish		Other Indo-European		Other	
	#	% of Total	#	% of Total	#	% of Total	#	% of Total
Speak English "very well"	9,284	58.1%	74,720	67.4%	5,176	68.0%	2,261	65.1%
Speak English less than "very well"	6,705	41.9%	36,222	32.6%	2,433	32.0%	1,214	34.9%
Total	15,989	100.0%	110,942	100.0%	7,609	100.0%	3,475	100.0%

Source: American Community Survey 2018-2022.

## 2. Household Profile

Information on household characteristics aids in understanding changing housing needs. The U.S. Census defines a household as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, and unrelated individuals living together.

### Household Characteristics

**Table 5** provides data on population and household characteristics in 2014 and 2024. During the 10-year time span, the population grew by 4,954 persons and the number of households (occupied housing units) increased by 4,376, according to California Department of Finance (DOF) estimates.

Between 2014 and 2024, the average household size decreased by 0.14 person from 3.20 to 3.06 persons per household. The group quarters population increased by 4,138 persons between 2014 and 2024.

Table 5: Population and Household Characteristics – City of Riverside (2014, 2024)			
Population	January 1, 2014	January 1, 2024	Increase
Group Quarters Population	12,967	17,105	4,138
Household Population	298,769	299,585	816
Total Population	311,736	316,690	4,954
Total Housing Units	98,790	101,922	3,132
Occupied Housing Units	93,495	97,871	4,376
Vacant Housing Units	5,295	4,051	-1,244
Vacancy Rate	5.4%	4.0%	-1.40%
Persons per Household	3.20	3.06	-0.14

Source: January 1, 2014 Department of Finance, E-8 Population and Housing Estimates for Cities, Counties, and the State; January 1, 2024 Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State 2020-2024.

### Household Composition and Size

Different household types generally have different housing needs. Seniors or young adults typically comprise a majority of single-person households and tend to reside in apartment units, condominiums, or smaller single-family homes. Families, meanwhile, often prefer single-family homes. Household size can be an indicator of changes in population or use of housing. An increase in household size can indicate a greater number of large families or a trend toward overcrowded housing units. A decrease in household size, on the other hand, may reflect a greater number of elderly or single-person households or a decrease in family size. Household composition and size are often two interrelated factors. Communities that have a large proportion of families with children tend to have a larger average household size. Such communities have a greater need for larger units with adequate open space and recreational opportunities for children.

Since 2000, Riverside has been a family-oriented community, where more than 70 percent of households identified themselves as families. The share of families in the City has increased from 71 percent in 2000 to 74 percent in 2022. However, the share of families with children fell during the same period, from 41 percent to 33 percent.

Over the past 20 years, the average household size increased slightly, from 3.01 to 3.32, as did the average family size, from 3.54 to 3.80. Consistent with the increase in household and family size, the population of single-person households has decreased from 21 percent in 2000 to 19 percent in 2022. Average household and family size in the City are slightly larger than for Riverside County as a whole, which had an average household size of 3.19 and an average family size of 3.70 in 2022.

**Table 6: Household Characteristics and Trends – City of Riverside (2000-2022)**

Household Type	2000		2010		2022	
	Number	Percent	Number	Percent	Number	Percent
<b>Total Households</b>	<b>82,128</b>	<b>100.0%</b>	<b>90,865</b>	<b>100.0%</b>	<b>90,540</b>	<b>100.0%</b>
Families	58,634	71.4%	65,551	72.1%	66,776	73.8%
With Children	33,792	41.1%	34,070	37.5%	29,982	33.1%
Non-Families	23,494	28.6%	25,314	27.9%	23,764	26.2%
Living Alone	17,550	21.4%	18,297	20.1%	16,849	18.6%
Other	5,944	7.2%	7,017	7.7%	6,915	7.6%
Average Household Size	3.01		3.23		3.32	
Average Family Size	3.54		3.76		3.80	

Sources: Bureau of the Census, 2000; 2006-2010 and 2018-2022 American Community Survey (ACS).

### 3. Income Profile

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities. A stable income is the means by which most individuals and families finance current consumption and make provision for the future through saving and investment. The level of cash income can be used as an indicator of the standard of living for most of the population.

Households with lower incomes are limited in their ability to balance housing costs with other needs and often the ability to find housing of adequate size. While economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships

among household income, household type, race/ethnicity, and other factors often create misconceptions and biases that raise fair housing concerns.

For purposes of most housing and community development activities, HUD has established the four income categories based on the Area Median Income (AMI) for the Metropolitan Statistical Area (MSA). HUD income definitions differ from the State of California income definitions. **Table 7** compares the HUD and State income categories. This AI report is a HUD-mandated study and therefore HUD income definitions are used. For other housing documents of the City (such as the Housing Element of the General Plan), the State income definitions may be used, depending on the housing programs and funding sources in question.

Table 7: Income Categories for CDBG Program				
HUD Definition		State of California Definition		
Extremely Low Income	Less than 30% of AMI	Extremely Low Income	Less than 30% of AMI	
Low Income	31-50% of AMI	Very Low Income	31-50% of AMI	
Moderate Income	51-80% of AMI	Low Income	51-80% of AMI	
Middle/Upper Income	Greater than 80% of AMI	Moderate Income	81-120% of AMI	
		Above Moderate Income	Greater than 120% of AMI	
Source: U.S. Department of Housing and Urban Development (HUD) and California Department of Housing and Community Development (HCD), 2024.				
Note: Other HUD programs may define low income as 80% AMI				

Median Household Income

According to the 2018-2022 ACS, Riverside households have a median household income of \$83,448. **Table 8** displays median household income in the City and Riverside County, as recorded by the 2006-2010 and 2018-2022 ACS. Median household income in the City is slightly lower than the in the County overall. The median household income saw about the same rate of growth in the City and the County between 2010 and 2022.

Table 8: Median Household Income (2010-2022)			
Jurisdiction	Median Household Income		Percent Change
	2010	2022	
Riverside	\$56,991	\$83,448	46.4%
Riverside County	\$57,768	\$84,505	46.3%
Source: American Community Survey, 2006-2010, 2018-2022.			

Income Distribution

Fair housing choice, according to HUD, means the ability of persons of similar income levels regardless of race, color, religion, sex, national origin, familial status and disability to have available to them the same housing choices. This means, for instance, those households of different races but with similar income levels should have available to them the same housing choices. Another example is that female householders, male householders and married couples with similar income levels should have available to them the same housing choices. A housing market that treats female and male householders with the same incomes differently would not be providing fair housing choice.



Household income has a positive impact on enabling people to find the housing of their choice. As incomes become higher, a fuller range of housing choice with respect to type, cost, and neighborhood location become available to them.

**Table 9** shows the number and percentages of households in five income groups by tenure. Approximately 42 percent of Riverside's 90,665 households have lower incomes, which makes them eligible to participate in the City's CDBG- and HOME-funded programs. Lower income renters comprise 26 percent of all the City's households (23,535 lower income renters of 90,665 total households). The largest income group (30,320 households) is above moderate income owners.

Income distribution, including a geographical analysis, is expanded upon in Chapter 7, *Private and Public Sector Fair Housing Impediments Analysis*.

Table 9: Household Income by Tenure – City of Riverside (2023)						
Household Income	Owner		Renter		Total	
	Households	Percent	Households	Percent	Households	Percent
Extremely Low	3,185	6.4%	8,525	20.9%	11,710	12.9%
Very Low	3,915	7.9%	6,490	15.9%	10,405	11.5%
Low	7,005	14.1%	8,520	20.8%	15,525	17.1%
Moderate	5,355	10.8%	4,735	11.6%	10,090	11.1%
Above Moderate	30,320	60.9%	12,610	30.8%	42,930	47.4%
Total	49,780	100.0%	40,880	100.0%	90,665	100.0%
Source: Comprehensive Housing Affordability Strategy ("CHAS") Data, based on the 2016-2020 American Community Survey. Extremely Low: Less than or = 30% HAMFI Very Low: >30% to less than or = 50% HAMFI Low: >50% to less than or = 80% HAMFI Moderate: >80% to less than or = 100% HAMFI Above Moderate: >100% HAMFI. HAMFI refers to HUD Area Median Family Income.						

**Table 10** shows HUD's 2024 annual income limits, adjusted by household size, for extremely low-, very low-, and low-income households. **Table 9** above indicates that 8,525 extremely low income renters live in Riverside. A 4-person extremely low income family would have an annual income of \$31,200 or less.

Table 10: HUD FY 2024 Income Limits – County of Riverside			
Number of Persons	Extremely Low	Very Low	Low
1	\$21,550	\$35,900	\$57,400
2	\$24,600	\$41,000	\$65,600
3	\$27,700	\$46,100	\$73,800
4	\$31,200	\$51,250	\$82,000
5	\$36,580	\$55,350	\$88,600
6	\$41,960	\$59,450	\$95,150
7	\$47,340	\$63,550	\$101,650
8	\$52,720	\$67,650	\$108,250
Source: U.S. Department of Housing and Urban Development, FY 2024 Income Limits. Note: Riverside County is part of the Riverside-San Bernardino-Ontario, CA MSA, so all information presented here applies to all of the Riverside-San Bernardino-Ontario, CA MSA. The Riverside-San Bernardino-Ontario, CA MSA contains the following areas: Riverside County, CA; and San Bernardino County, CA. The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the greater of 30/50ths (60 percent) of the Section 8 very low-income limit or the poverty guideline as established by the Department of Health and Human Services (HHS), provided that this amount is not greater than the Section 8 50% very low-income limit. Consequently, the extremely low (30%) income limits may equal the very low (50%) income limits.			

Table 11: Housing Assistance Needs by Income and Household Type (2020)									
Household Income and Housing Problem	Renter-Occupied				Owner-Occupied				Total Households
	Elderly Household	Small Household	Large Household	Total	Elderly Household	Small Household	Large Household	Total	
<b>Extremely Low Income (&lt;30% MFI)</b>	<b>2,245</b>	<b>2,905</b>	<b>800</b>	<b>8,525</b>	<b>1,265</b>	<b>1,105</b>	<b>300</b>	<b>3,185</b>	<b>11,710</b>
With any housing problem	81.1%	87.8%	100.0%	83.8%	79.1%	90.5%	83.3%	82.4%	83.4%
Cost burden >30%	73.7%	85.9%	96.3%	82.1%	79.1%	88.7%	65.0%	79.7%	81.4%
Cost burden >50%	58.1%	83.3%	76.9%	74.0%	64.4%	77.4%	50.0%	67.7%	72.3%
<b>Very Low Income (30-50% MFI)</b>	<b>1,040</b>	<b>2,640</b>	<b>1,455</b>	<b>6,490</b>	<b>1,910</b>	<b>1,200</b>	<b>500</b>	<b>3,915</b>	<b>10,405</b>
With any housing problem	84.6%	93.6%	97.3%	93.1%	55.5%	86.3%	79.0%	69.7%	84.3%
Cost burden >30%	84.1%	91.5%	83.5%	88.7%	58.6%	86.3%	73.0%	69.1%	81.3%
Cost burden >50%	39.9%	54.9%	28.2%	48.4%	21.2%	52.5%	28.0%	37.8%	44.4%
<b>Low Income (50-80% MFI)</b>	<b>850</b>	<b>4285</b>	<b>1290</b>	<b>8520</b>	<b>2250</b>	<b>2475</b>	<b>1660</b>	<b>7005</b>	<b>15525</b>
With any housing problem	75.3%	74.4%	84.9%	75.0%	40.9%	64.4%	72.6%	56.9%	66.8%
Cost burden >30%	74.1%	64.5%	52.7%	64.4%	40.2%	63.0%	52.4%	51.5%	58.6%
Cost burden >50%	11.8%	11.0%	6.2%	12.1%	19.1%	15.2%	6.9%	14.7%	13.3%
<b>Moderate and Above (&gt;80% MFI)</b>	<b>1,710</b>	<b>8,760</b>	<b>2,545</b>	<b>17,345</b>	<b>8,070</b>	<b>18,005</b>	<b>6,570</b>	<b>35,675</b>	<b>53,020</b>
With any housing problem	23.7%	21.5%	44.2%	25.2%	12.8%	14.5%	30.4%	17.3%	19.9%
Cost burden >30%	18.9%	14.2%	5.1%	14.8%	12.1%	13.7%	8.1%	12.5%	13.2%
Cost burden >50%	0.8%	0.2%	0.0%	0.5%	2.5%	1.5%	1.1%	1.8%	1.4%
<b>All Households</b>	<b>5,845</b>	<b>18,590</b>	<b>6,090</b>	<b>40,880</b>	<b>13,495</b>	<b>22,785</b>	<b>9,030</b>	<b>49,780</b>	<b>90,665</b>
With any housing problem	64.1%	54.3%	72.8%	58.6%	29.8%	27.4%	42.6%	31.1%	43.5%
Cost burden >30%	59.6%	48.0%	45.9%	50.9%	29.7%	26.5%	21.8%	26.7%	37.6%
Cost burden >50%	31.4%	23.4%	18.1%	25.8%	13.7%	9.3%	5.3%	10.7%	17.5%

Note: Data presented in this table is based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% count due to the need to extrapolate sample data out to total households. Interpretations of this data should focus on the proportion of households in need of assistance rather than on precise numbers. Source: 2023 HUD Comprehensive Housing Affordability Strategy (CHAS) Data (based on American Community Survey, 2016-2020 Estimates).

### Household Income by Household Type

Household income often varies by household type. As shown, in **Table 11** above, approximately 44 percent of the City's households experienced at least one housing problem (physical defects, overcrowding, cost burden, and/or severe cost burden). The incidence of housing problems was higher among renter households (59 percent) than households who owned their homes (31 percent). Large households faced housing problems at a higher proportion than the elderly and small families, regardless of income or tenure (73 percent of large renter households and 43 percent of large owner households).

Housing problems, including cost burden, overcrowding, and substandard housing conditions, are discussed further in Chapter 7, *Private and Public Sector Fair Housing Impediments Analysis*.

### Poverty

People in poverty may be unable to secure housing in neighborhoods that offer opportunities such as superior schools and proximity to good parks and other amenities. Poverty is a measure of income or, more accurately, the lack of income. In accordance with the Consolidated Plan Final Rule, the City's FY 2024/2025 to FY 2028/2029 Consolidated Plan will set forth an anti-poverty strategy.

Measuring poverty is a two-step process:

- Establishing a poverty threshold which is the amount of money needed to achieve a minimum level of material well-being.
- Estimating families' cash and non-cash resources and comparing them to the poverty threshold to determine whether a family is below it and, therefore, defined as "poor".

Examples of official United States 2023 poverty thresholds are:<sup>2</sup>

- |   |          |
|---|----------|
| • 1 person less than 65 years of age              | \$15,852 |
| • 2 people, householder less than 65 years of age | \$20,404 |
| • 3 people, 1 child less than 18 years of age     | \$24,526 |
| • 4 people, 2 children less than 18 years of age  | \$30,900 |

**Table 12** demonstrates that approximately 13 percent of all Riverside residents live in households with annual incomes below the poverty level. The highest poverty rates are experienced by female-householder families (16 percent to 19 percent) and elderly persons aged 65 or older (12 percent to 16 percent).

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<sup>2</sup> United States Census Bureau, 2023 Poverty Thresholds by Size of Family and Number of Children. Accessed August 2024. <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>.

Table 12: Poverty Characteristics – City of Riverside (2018-2022)		
Population	2018-2022 ACS	2022 ACS
Total Population	12.8%	12.8%
18 to 64 years	11.8%	11.7%
65 years and over	12.3%	15.7%
All Families	9.0%	8.6%
Married Couple Families	5.0%	5.6%
Female Householder Families	19.4%	16.2%
Source: 2018-2022 American Community Survey 5-Year Estimates, Table CP03, Comparative Economic Characteristics and 2022 American Community Survey 1-Year Estimates, Table CP03, Comparative Economic Characteristics		

**Table 13** reports on additional poverty statistics based on the California Poverty Measure (CPM) for the County of Riverside. The CPM accounts for how the social safety net, specifically, CalFresh, CalWORKS, the Earned Income Tax Credit (EITC), and other means-tested programs, moderates poverty. The CPM poverty rate of 12 percent for the County is comparable to the poverty rate of 11 percent based on 2022 ACS poverty rate estimates for Riverside County. Poverty rates are reduced due to social safety net programs, most significantly the CalFresh program.

Patterns of poverty in the City of Riverside are expanded upon in Chapter 7, *Private and Public Sector Fair Housing Impediments Analysis*.

Table 13: Poverty Indicators – County of Riverside (2023)		
Poverty Indicator		County
CPM Poverty	Rate	11.8%
	Rate margin of error (% pt)	1.4
	Number	291,500
	Number margin of error	42,800
CPM Child Poverty	Rate	10.6%
	Rate margin of error (% pt)	2.2
CPM Poverty Threshold, renter family of 4	(\$)	\$37,621
Increase in poverty without safety net	Increase (% pt)	8.3
	Margin of error (% pt)	1.2
Increase in poverty without CalFresh	Increase (% pt)	3.1
	Margin of error (% pt)	0.9
Increase in poverty without CalWORKs and General Assistance (GA)	Increase (% pt)	0.7
	Margin of error (% pt)	0.5
Increase in poverty without federal EITCs	Increase (% pt)	1.0
	Margin of error (% pt)	0.5
Source: Public Policy Institute of California and Stanford Center on Poverty and Inequality, Poverty Across California, 2023.		

## 4. Housing Profile

A discussion of fair housing choice must be preceded by an assessment of the housing market. A diverse housing stock that includes a mix of conventional and specialized housing helps ensure that all households, regardless of their income level, age group, and familial status, have the opportunity to find suitable housing. This chapter provides an overview of the characteristics of the local and regional housing markets.

The Census Bureau defines a housing unit as a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied (or, if vacant, is intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building and that have direct access from outside the building or through a common hall.

### Housing Stock

**Table 14** shows that almost 102,000 housing units comprise the housing stock. Single-family detached and attached homes account for just over two-thirds (67 percent) of the housing stock. Multi-family housing in structures containing 10 or more dwellings comprises almost one-sixth (16 percent) of the housing stock.

Over the past 10 years, multi-family housing with five or more units saw the largest growth of 8 percent since 2014 (see **Table 15**). The number of single-family attached units increased by 4 percent, single-family detached units increased by 2 percent, and multi-family housing with two to four units increased by 0.1 percent during this period. The City saw a decrease in mobile homes, RVs, and vans as housing arrangements by 4 percent. Overall, the housing stock increased 3 percent between 2014 and 2024.

**Table 14: Housing Stock by Type of Unit – City of Riverside (January 1, 2024)**

Type of Unit	# of Units	Percent
1 unit, detached	64,589	63.4%
1 unit, attached	4,106	4.0%
2 to 4 units	6,257	6.1%
5-9 units	5,579	5.5%
10-19 units	5,881	5.8%
20 or more units	10,509	10.3%
Mobile homes, RV, Van, etc.	2,099	2.1%
<b>Total</b>	<b>101,922</b>	<b>100.0%</b>
Source: State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State January 1, 2024. The 2018-2022 American Community Survey (Table DP04) data on units in structure were used to calculate the number of units in structures containing 5 or more units		

**Table 15: Housing Stock Increase by Type of Unit – City of Riverside  
(January 1, 2014 to January 1, 2024)**

Type of Unit	# of Units	Percent
1 unit, detached	1,116	1.7%
1 unit, attached	158	3.8%
2 to 4 units	5	0.1%
5+ units	1,941	7.8%
Mobile homes, RV, Van, etc.	-80	-3.8%
<b>Total</b>	<b>3,132</b>	<b>3.1%</b>
Source: January 1, 2014 Census and State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State January 1, 2024.		

### Homeownership

Homeownership is a key indicator of community and personal well-being, because owning a home is often a household's major asset and home equity often contributes to a large share of wealth. **Table 16** shows the 2000, 2010, and 2022 homeownership rates for the City of Riverside, Riverside County, California, and the Nation. In all three periods, Riverside had a somewhat lower homeownership rate than the County and the Nation and almost the same as the State.

Table 16: Comparison of Homeownership Rates by Year			
Area	2000	2010	2022
City of Riverside	56.6%	55.7%	55.5%
Riverside County	68.9%	67.4%	68.5%
California	56.9%	55.9%	55.6%
Nation	66.2%	65.1%	64.8%
Source: 2000 Census Summary File 1, Table QT-H2: Tenure, Household Size and Age of Householder; 2010 Census DP-1 Profile of Population and Housing Characteristics: 2010, Housing Tenure; 2018-2022 American Community Survey (ACS) 5-Year Estimates, Table DP04: Selected Housing Characteristics.			

During the 2000-2022 period, the percentage of owner-occupied housing decreased slightly from 57 percent to 56 percent. Two possible reasons for the decline are that 1) foreclosed upon homes became renter-occupied and 2) more multifamily than single-family housing units were added to the housing stock.

The homeownership rate in the City is significantly smaller than the share of single-family homes in Riverside, representing 67.4 percent of the housing stock. But, as **Table 17** reveals, almost one of every four single-family detached homes are renter-occupied. Additionally, more than half of single-family attached homes are renter-occupied. Overall, 26 percent of Riverside's single-family homes are renter-occupied. The large population of college students residing in the City may contribute to the significant proportion of renters residing in single-family homes. According to the 2018-2022 ACS, 38,259 students are enrolled in college (undergraduate) or graduate school in Riverside, representing approximately 12 percent of the total population. In comparison, 178,085 students are enrolled in college or graduate school countywide, representing only 7 percent of the total population.

Table 17: Owner/Renter Occupancy of Single Family Homes – City of Riverside (2022)					
Housing Type	Owner	Percent	Renter	Percent	Total
Single Family Detached	46,784	76.3%	14,497	23.7%	61,281
Single Family Attached	2,385	45.2%	2,887	54.8%	5,272
Total	49,169	73.9%	17,384	26.1%	66,553
Source: 2018-2022 American Community Survey 5-Year Estimates, Table B25024, Units in Structure and Table B25032, Tenure by Units in Structure.					

## 5. Employment and Transportation Profile

### *Labor Force and Employment Characteristics*

Having a job and earning income is a prerequisite to enabling families to find housing of their choice, that is within their means, and that is located in neighborhoods they and their children like. Housing choice for all racial and ethnic groups is diminished when unemployment rates are high because they depress household income and increase the number of poverty income families.

Key labor force and employment terms are defined below:

**Labor Force** – All people classified in the civilian labor force plus members of the U.S. Armed Forces (people on active duty with the United States Army, Air Force, Navy, Marine Corps, or Coast Guard).

**Labor Force Participation Rate** – The labor force participation rate represents the proportion of the population that is in the labor force. For example, if there are 100 people in the population 16 years and over, and 64 of them are in the labor force, then the labor force participation rate for the population 16 years and over is 64 percent.

**Not in Labor Force** – All people 16 years old and over who are not classified as members of the labor force. This category consists mainly of students, homemakers, retired workers, seasonal workers interviewed in an off season who were not looking for work, institutionalized people, and people doing only incidental unpaid family work (less than 15 hours during the reference week).

**Unemployment Rate** – The unemployment rate represents the number of unemployed people as a percentage of the civilian labor force. For example, if the civilian labor force equals 100 people and seven people are unemployed, then the unemployment rate is seven percent.

**Table 18** shows that Riverside’s civilian labor force ranges between approximately 160,000 and 170,000 persons 16 years of age or older, resulting in a labor force participation rate of about 64 percent, according to the 2018-2022 ACS. Based on 2018-2022 estimates, there are 10,262 unemployed persons in the City resulting in an unemployment rate of 3 percent. The City’s unemployment rate has been gradually decreasing in recent years. The 2013-2017 ACS estimated the unemployment rate in Riverside was 10 percent. This exceptionally high unemployment rate was due to the depressed housing market and slowed economy that took place between 2012 and 2016.



Table 18: Labor Force and Employment Characteristics – City of Riverside (2018-2022)		
	2018-2022 ACS	2022 ACS
Population 16 years and over	250,285	258,174
In Civilian Labor Force*	159,932	169,708
% in Civilian Labor Force	63.9%	65.7%
Not in Civilian Labor Force	90,103	88,296
% Not in Civilian Labor Force	36.0%	34.2%
In Civilian Labor Force, Unemployed	10,262	8,262
Civilian Unemployment Rate	3.1%	4.9%
Source: 2018-2022 American Community Survey 5-Year Estimates, Table CP03, Comparative Economic Characteristics and 2022 American Community Survey 1-Year Estimates, Table CP03, Comparative Economic Characteristics.		
*Does not include persons in the Armed Forces		

**Table 19** provides data on the composition of the City’s 150,122 employed population. The industry sectors with the largest populations of employed persons are educational services, health care and social assistance (23 percent), retail trade (12 percent), manufacturing (10 percent), and arts, entertainment, recreation, accommodation, and food services (10 percent). The industry sectors with the largest gains in jobs over the past decade include transportation, warehousing, and utilities (+65 percent), arts, entertainment, recreation, accommodation, and food services (+45 percent), and public administration (+43 percent).

Table 19: Employment by Industry – City of Riverside (2022)				
Industry Sector	# Employed	Sector Share	Change Since 2010	Median Earnings (2022)
<b>Civilian employed population 16 years and over with earnings</b>	<b>150,122</b>	<b>100.0%</b>	<b>14.7%</b>	<b>\$40,113</b>
Agriculture, forestry, fishing and hunting, and mining	738	0.5%	15.0%	\$38,333
Construction	13,424	8.9%	16.4%	\$47,101
Manufacturing	14,605	9.7%	-6.7%	\$44,582
Wholesale trade	4,013	2.7%	-19.2%	\$44,953
Retail trade	17,520	11.7%	11.4%	\$30,992
Transportation warehousing, and utilities:	12,502	8.3%	64.8%	\$37,146
Information	2,080	1.4%	-16.8%	\$60,521
Finance and insurance, real estate, and rental and leasing	6332	4.2%	-15.2%	\$50,565
Professional, scientific, management, and administrative and waste management services	13,915	9.3%	13.7%	\$41,509
Educational services, health care, and social assistance	34,774	23.2%	15.0%	\$47,178
Arts, entertainment, recreation, accommodation, and food services	14,626	9.7%	44.7%	\$16,330
Other services, except public administration	7,923	5.3%	14.9%	\$33,102
Public administration	7,670	5.1%	43.1%	\$70,013
Source: 2006-2010 and 2018-2022 American Community Survey 5-Year Estimates, Table DP03 and Table S2413.				

### Major Employers

**Table 20** list the major employers located in Riverside. Eleven of the 13 employers with 1,000 or more employees provide government, educational, and healthcare services. The major employers mirror the industry sectors with the largest number of jobs – health care and social assistance; educational services; and government.

Table 20: Employers with 1,000 or More Employees – City of Riverside (2024)		
Employer	Employees	Industry
County of Riverside	24,290	Government Offices
March Air Forces Reserve	9,600	Military
University of California, Riverside	8,593	Education
Riverside University Health Systems	8,000	Medicare
Kaiser Permanente	5,846	Healthcare
Riverside Unified School District	5,003	Education
City of Riverside	2,336	Government Offices
Riverside Community Hospital	2,200	Healthcare
Riverside Community College District	2,100	Education
Alvord Unified School District	1,898	Education
Riverside County Office of Education	1,700	Education
Cal Baptist University	1,442	Education
Collins Aerospace Systems	1,000	Aircraft Components Manufacturing

Source: City of Riverside, Top Employers, August 2024.

### Commuting Patterns

Over 80 percent of Riverside County commuters commute to jobs located within the Inland Empire counties of Riverside and San Bernardino. Among other adjacent counties, Riverside County has the most workers commuting to Orange County (7 percent), followed by Los Angeles County (5 percent), and San Diego County (5 percent).

**Table 22** shows commuting characteristics for workers in the City of Riverside. Most workers (86 percent) drive to work by car, truck, or van. Another 8 percent work from home, 2 percent walk, and 2 percent use public transportation. The largest proportion of workers (16 percent) commute 60 or more minutes to work. Another 16 percent commute 30 to 34 minutes, 15 percent commute 20 to 24 minutes, and 13 percent commute 15 to 19 minutes. Long commutes can cause unusually high transportation costs and reduce the amount of income that can be allocated to housing costs.

Table 21: Resident Commute to Work Destinations (2020)		
Place	# of Commuters	Percent
San Bernardino County	113,716	11.2%
Riverside County	725,518	71.2%
Orange County	75,863	7.4%
Los Angeles County	53,172	5.2%
Rest of California	4,317	0.4%
San Diego County	47,073	4.6%
Total	1,019,659	100.0%

Sources: 2016-2020 5-Year ACS Commuting Flows

Table 22: Commuting Characteristics – City of Riverside (2022)	
Workers 16 years and over	146,251
Means of Transportation to Work	
Car, truck, or van	85.9%
Public transportation (excluding taxicab)	1.9%
Walked	2.4%
Bicycle	0.6%
Taxicab, motorcycle, or other means	1.1%
Worked from home	8.1%
Travel Time to Work	
Less than 10 minutes	8.7%
10 to 14 minutes	11.4%
15 to 19 minutes	13.3%
20 to 24 minutes	14.9%
25 to 29 minutes	5.4%
30 to 34 minutes	15.7%
35 to 44 minutes	6.7%
45 to 59 minutes	8.2%
60 or more minutes	15.80%
Source: 2018-2022 American Community Survey 5-Year Estimates, Table S0801.	

## 6. Education and Schools Profile

### Educational Attainment

Higher incomes enable households to more effectively acquire housing of their choice and within their means. And householders with higher levels of educational achievement, on average, have higher earnings. As noted in the labor force and employment discussion, one means to improve economic indicators 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.

**Table 23** indicates the educational attainment of the population 25 years of age and older. More than 26 percent of the population has a Bachelor's, Graduate, or Professional Degree. **Table 24** demonstrates that median earnings increase as a higher level of educational attainment is achieved. The median earnings of a person with a bachelor's degree are nearly twice those of a person who did not graduate from high school.

Table 23: Educational Attainment for the Population 25 Years and Over – City of Riverside (2022)		
Educational Attainment	Number	Percent
Less than 9th Grade	17,088	8.2%
9th to 12 Grade, No Diploma	15,311	7.4%
High School Graduate	57,696	27.8%
Some College, No Degree	46,533	22.4%
Associate's Degree	15,446	7.4%
Bachelor's Degree	32,898	15.9%
Graduate or Professional Degree	22,368	10.8%
Total	207,340	100.0%
Source: 2022 American Community Survey 1-Year Estimates, Table C15002, Sex by Educational Attainment for the Population 25 Years and Over.		

Table 24: Median Earnings by Educational Attainment – City of Riverside (2022)		
Educational Attainment	2018-2022 ACS	2022 ACS
Less than High School Graduate	\$33,169	\$34,502
High School Graduate	\$39,636	\$40,593
Some College or Associate's Degree	\$45,148	\$42,167
Bachelor's Degree	\$58,006	\$59,860
Graduate or Professional Degree	\$84,165	\$75,000

Source: 2018-2022 American Community Survey 5-Year Estimates and 2022 American Community Survey 1-Year Estimates, Table B20004, Median Earnings in the Past 12 Months (in 2022 Inflation- Adjusted Dollars) by Sex by Educational Attainment for the Population 25 Years and Over.

### K-12 Schools

**Table 25** reports on the school enrollment by race and ethnicity for Riverside Unified and Alvord Unified School Districts. **Table 26** shows graduation rates for these districts by race/ethnicity for the 2023-2024 school year. Graduation rates for all racial/ethnic groups are above 90 percent. In comparison, the graduation rates Statewide and Countywide were 89 percent and 92 percent, respectively, during this period. Access to educational opportunities in the City of Riverside are further discussed in Chapter 7, *Private and Public Sector Fair Housing Impediments Analysis*, of this Analysis of Impediments to Fair Housing Choice.

Table 25: School Enrollment by Race/Ethnicity and School District (2024)						
Race/Ethnicity	Riverside Unified	Percent	Alvord Unified	Percent	Total	Percent
American Indian/Alaska Native	105	0.3%	30	0.2%	135	0.2%
Asian	1,521	3.9%	605	3.6%	2126	3.8%
Black/African American	2,344	5.9%	647	3.9%	2991	5.3%
Filipino	436	1.1%	236	1.4%	672	1.2%
Hispanic	27,144	68.7%	13,565	81.4%	40709	72.5%
Native Hawaiian/Pacific Islander	123	0.3%	83	0.5%	206	0.4%
Two or More Races	816	2.1%	284	1.7%	1100	2.0%
White	6,351	16.1%	1,212	7.3%	7563	13.5%
Total	39,505	100.0%	16,663	100.0%	56168	100.0%

Source: DataQuest Annual Enrollment Data, California Department of Education, 2023-2024.  
Note: Excludes Not Reported race/ethnicity

Table 26: Graduation Rate by District and Race/Ethnicity (2023)				
Race/Ethnicity	Riverside Unified		Alvord Unified	
	Cohort Students	Graduation Rate	Cohort Students	Graduation Rate
American Indian/Alaska Native	17	94.1%	–	–
Asian	126	94.4%	49	100.0%
Black/African American	187	93.6%	50	98.0%
Filipino	62	98.4%	25	100.0%
Hispanic	1,954	90.9%	1,209	94.2%
Pacific Islander	16	100.0%	–	–
Two or more races	52	98.1%	15	100.0%
White	641	95.8%	129	96.1%

Source: DataQuest Annual Enrollment Data, California Department of Education, 2023-2024.  
Note: Excludes Not Reported race/ethnicity

## 4. Protected Class Profiles

A “protected class” is a group of people with a common characteristic who are legally protected from housing discrimination on the basis of that characteristic. Protected classes are created by both Federal and State law. The protected classes under federal law include:

- Race
- Color
- National Origin
- Sex (including gender identity and sexual orientation)
- Familial Status
- Disability (mental and/or physical)
- Religion

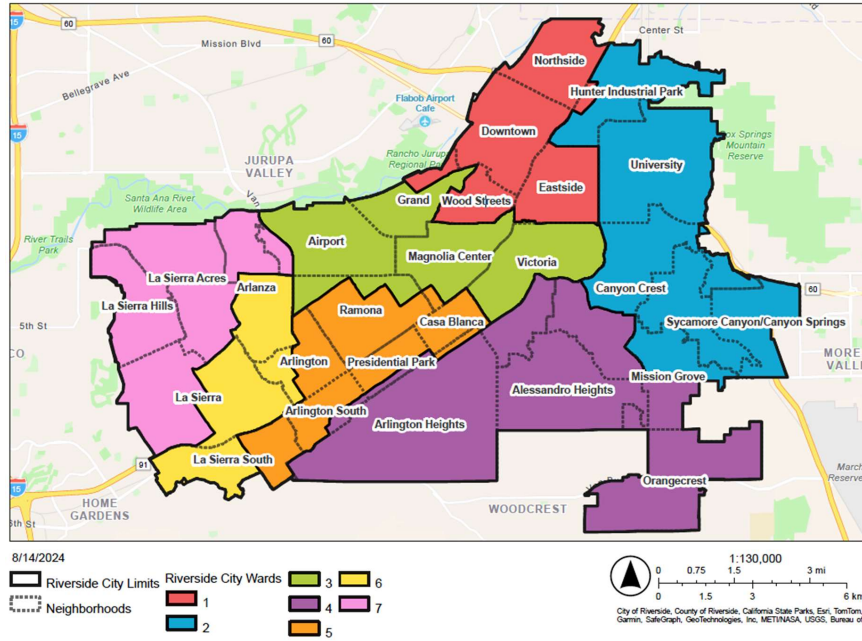
The Fair Housing Act prohibits both intentional housing discrimination and housing policies and practices that discriminate against the seven protected classes/groups. In addition to the seven classes protected under federal law, California law enumerates seven additional groups: age, marital status, ancestry, source of income, genetic information, and other arbitrary factors. Because the AI is a federal document, the analysis focuses primarily on the protected classes listed in the federal Fair Housing Act. However, the analysis also includes protected groups and special needs populations that are considered during the Consolidated Planning Process including:

- Seniors
- Limited English Proficiency
- Source of Income
- Persons Experiencing Homelessness

AB 686 mandated that cities include an Assessment of Fair Housing (AFH) in their Sixth Cycle Housing Element update. To aid in this analysis, the Housing and Community Development (HCD) department developed the AFFH Mapping Tool, which offers geographic mapping capabilities to visualize and analyze demographic data related to fair housing. This Chapter integrates the most recent data from the AFFH Mapping Tool for the protected classes covered by the tool.

The City of Riverside is divided into seven wards for administrative and planning purposes. However, maps accompanying this analysis will display geographic areas by neighborhood names for better visualization and understanding and to complement the analysis done in the Sixth Cycle Housing Element. While neighborhoods do not perfectly align with ward boundaries, both a map and a table are provided to illustrate their relationship.

**Figure 1: Riverside Ward and Neighborhoods**



Ward	Neighborhoods	Ward	Neighborhoods
1	Northside Downtown Eastside Wood Streets Grand (partial)	5	Arlington Ramona La Sierra South (partial) Arlington South Presidential Park Casa Blanca
2	Hunter Industrial Park University Canyon Crest (partial) Sycamore Canyon Park Sycamore Canyon/Canyon Springs Mission Grove (partial)	6	Arlanza Arlington (partial) La Sierra (partial) La Sierra South (partial)
3	Airport Grand Magnolia Center Victoria Ramona (partial)	7	Airport (partial) Arlanza (partial) La Sierra Acres La Sierra Hills La Sierra (partial)
4	Arlington Heights Hawarden Hills Alessandro Heights Canyon Crest (partial) Mission Grove (partial) Orangecrest		

## 4.1 Race/Color<sup>3</sup>

### 1. Population Characteristics by Race and Ethnicity

The Fair Housing Act does not define race. The racial categories included on the 2010 Census form generally reflect a *social definition* of race recognized in this country, and are not an attempt to define race biologically, anthropologically, or genetically. In addition, the U.S. Census Bureau recognizes that the race categories include both racial and national origin or socio-cultural groups. Census 2020 and the American Community Survey provide for six race categories:

- White Alone
- Black, African American Alone
- American Indian or Alaska Native Alone
- Asian Alone
- Native Hawaiian or Other Pacific Islander Alone
- Some Other Race Alone

Individuals who chose more than one of the six race categories are referred to as the *two or more races* population. All respondents who indicated more than one race can be collapsed into the *two or more races* category, which combined with the six *alone* categories, yields seven mutually exclusive categories. Thus, the six *race alone* categories and the *two or more races* category sum to the total population. Ethnicity means being of Hispanic or Latino Origin or not being of such origin.

In the past 5 years for which data is available, between 2017 and 2022, the racial and ethnic makeup of the City has stayed relatively the same. The City continues to be predominantly Hispanic (55 percent) and White (27 percent), but the percentage of White population has decreased while the percentage of Hispanic population has increased. The percentage of other minority populations has also increased (Asian and Two or more races).

**Table 27: Race and Ethnicity (2017-2022)**

Race/Ethnicity	2017		2022	
	#	%	#	%
White alone	99,868	31.1%	86,337	27.3%
Black or African American alone	18,271	5.7%	17,060	5.4%
American Indian and Alaska Native alone	818	0.3%	767	0.2%
Asian alone	22,727	7.1%	25,932	8.2%
Native Hawaiian and Other Pacific Islander alone	822	0.3%	973	0.3%
Some other race alone	1,077	0.3%	552	0.2%
Two or more races	8,252	2.6%	9,468	3.0%
Hispanic or Latino	169,735	52.8%	174,987	55.4%
Total	321,570	100.0%	316,076	100.0%

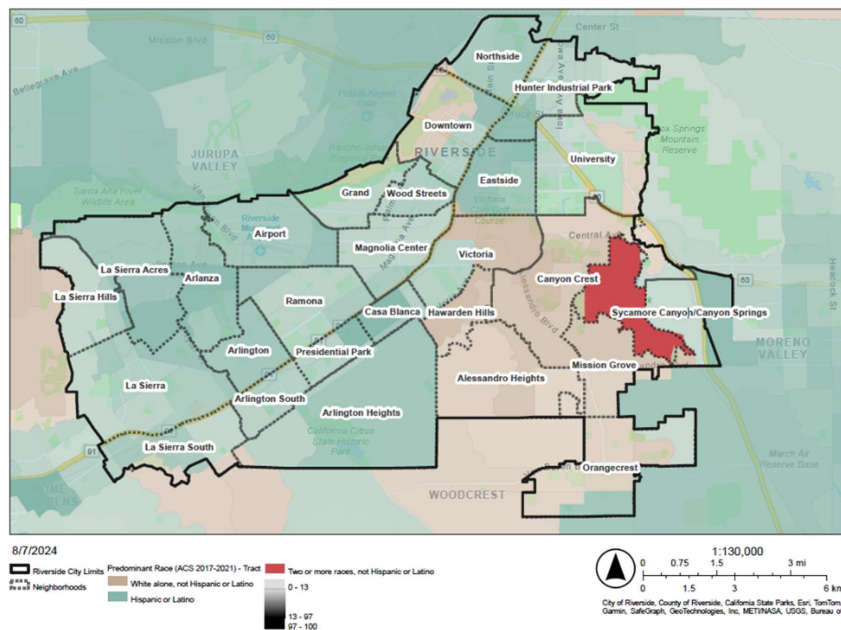
Sources: 2012-2017 and 2018-2022 American Community Survey 5-Year Estimates, Table B03002: Hispanic or Latino Origin by Race.

<sup>3</sup> Color analysis is often combined with race in studies because detailed data on color alone is not widely available. Racial and ethnic data is more commonly collected and used.



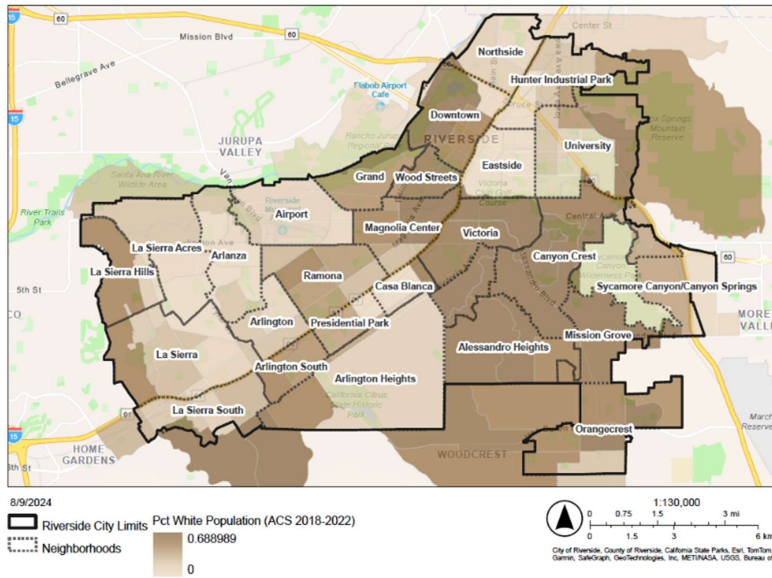
**Figure 2** displays the predominant races by tract, with darker colors representing higher levels of predominance. Throughout the City, the predominant races are White non-Hispanic and Hispanic-Latino. Hispanic or Latino population is most prominent in the western part of the City, including the Arlanza and La Sierra Acres neighborhoods; in the central area around the 91 Freeway, such as Casa Blanca and Arlington Heights; and in the Eastside neighborhood just east of Downtown. White non-Hispanic population is predominant in eastern parts of the City, especially in Victoria and Canyon Crest. Although the map shows that two or more races are predominant in Sycamore Canyon Park (red tract), the 2017-2021 ACS estimates on which the map is based reported the population in this tract was only 12 people, all of whom identified as two or more races. The most recent 2018-2022 ACS estimates show that the population for this tract has dropped to zero. The City considers Sycamore Canyon Park to be unpopulated.

**Figure 2: Predominant Races – City of Riverside**

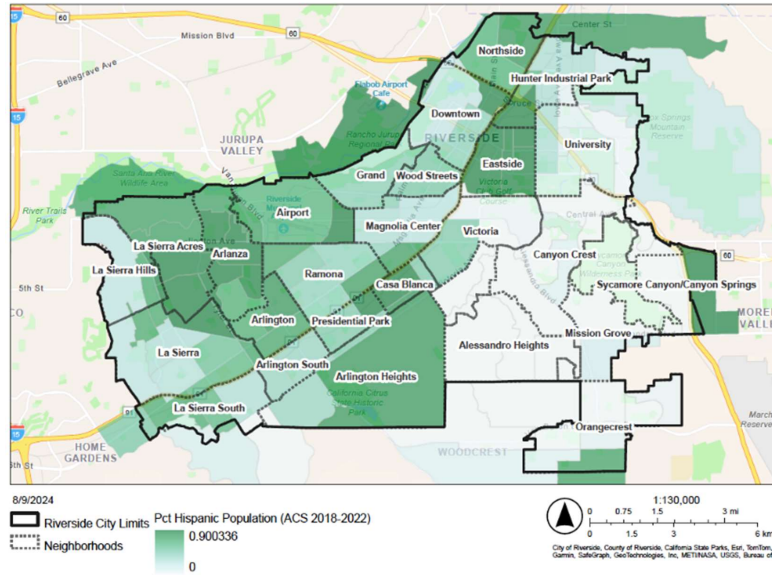


**Figure 3** through **Figure 6** below show the concentration of the population by race for White (non-Hispanic), Hispanic, Asian, and Black/African American groups. These four groups make up 95 percent of the population (27 percent White, 55 percent Hispanic, 8 percent Asian, and 5 percent Black). It is important to note that the dark colors on each map represent different population concentrations due to the varying sizes of these groups. For example, for White population, the darker colors (maximum values) represent tracts where White population make up to 69 percent of the tract's population, while for Black population, the maximum values represent up to 20 percent of the tract.

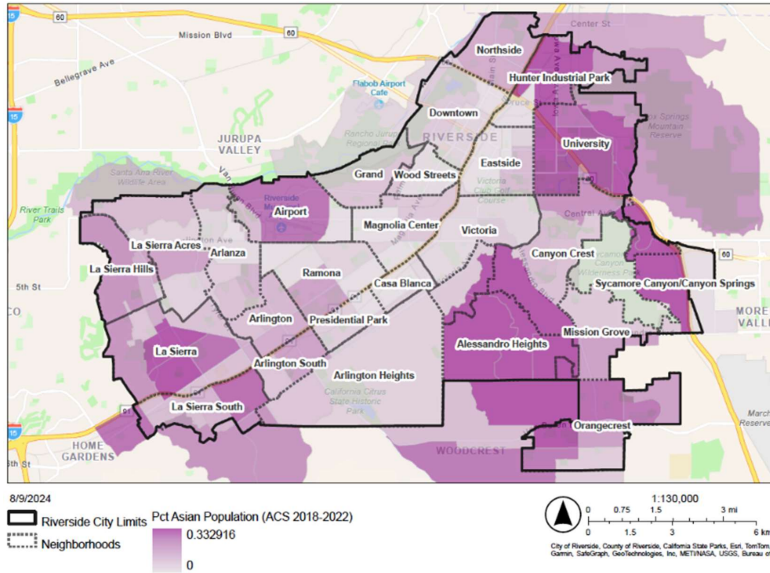
**Figure 3: Percentage Distribution of the Total Population by Race: White**



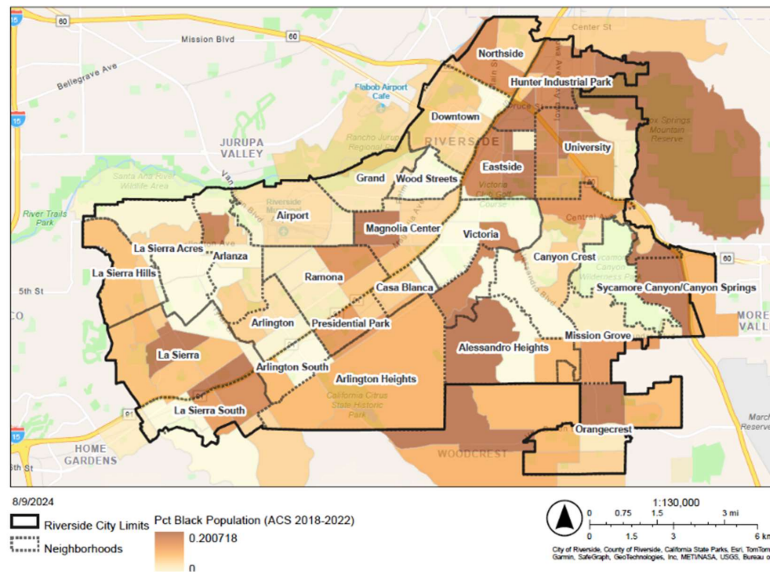
**Figure 4: Percentage Distribution of the Total Population by Race: Hispanic**



**Figure 5: Percentage Distribution of the Total Population by Race: Asian**



**Figure 6: Percentage Distribution of the Total Population by Race: Black**



## 2. Poverty and Tenure by Race and Ethnicity

Approximately 13 percent of the total population has incomes below the poverty level.

**Table 28** shows that poverty rates differ by race and ethnicity. All groups except the White Alone (10.2 percent) experience poverty rates greater than the citywide average of 12.8%. The Asian poverty rate is the highest among the minority races at 18.5 percent.

Although poverty rates differ, any household with such low incomes – regardless of race or ethnicity – would be unable to afford market rate housing. Poverty incomes severely restrict their ability to attain the housing of their choice.

Table 28: Poverty Status by Race and Ethnicity (2022)			
	Total	# Below Poverty	% Below Poverty
Population for whom poverty status is determined	301,385	38,432	12.8%
White alone	82,712	8,423	10.2%
Black or African American alone	17,217	2,279	13.2%
American Indian and Alaska Native alone	2,361	331	14.0%
Asian alone	22,942	4,239	18.5%
Native Hawaiian and Other Pacific Islander alone	1,269	154	12.1%
Some other race alone	81,750	12,107	14.8%
Two or more races	38,483	40,08	10.4%
Hispanic or Latino origin (of any race)	169,241	22,579	13.3%

Sources: 2018-2021 American Community Survey 5-Year Estimates, Table S1701 Poverty Status in the Past 12 Months.

Prospective homeowners may experience housing discrimination during the process of buying a home. For instance, discriminatory behavior could be made by real estate agents, appraisers, lenders, and home insurance agents. Renters, on the other hand, could be denied access to housing while in-place tenants could be discriminated against by landlords. Approximately 56 percent of Riverside's households are owner-occupied (**Table 29**). Some groups have a homeownership rate of 56 percent or more: White Alone, Not Hispanic householders (65 percent), Asian householders (57 percent), and Native Hawaiian/Pacific Islanders householders (62 percent). Black/African American, American Indian/Alaska Native, and Hispanic householders experience lower home ownership rates.

Table 29: Tenure by Race and Ethnicity (2022)					
	Owner Household		Renter Household		Total
	#	%	#	%	
White Alone, Not Hispanic	21,996	65.4%	11,626	34.6%	33,622
Black or African American	2,489	39.3%	3,841	60.7%	6,330
American Indian/Alaska Native	375	46.3%	435	53.7%	810
Asian	4,138	57.3%	3,082	42.7%	7,220
Native Hawaiian or Other Pacific Islander	254	62.3%	154	37.7%	408
Some Other Race	8,817	45.9%	10,382	54.1%	19,199
Two or More Races	5,030	53.2%	4,422	46.8%	9,452
Hispanic or Latino of any race	20,258	49.9%	20,303	50.1%	40,561
Total	50,227	55.5%	40,313	44.5%	90,540

Sources: 2018-2022 American Community Survey 5-Year Estimates, Table B25003A-1 Tenure by Race/Ethnicity.

There is a high correlation between the number and percentage of renter households and the need for fair housing services. The overwhelming majority of the alleged housing discriminatory acts reported to HUD and the Fair Housing Council of Riverside County are filed by renter householders (see Chapter 7: Private and Public Sector Fair Housing Impediments Analysis). In addition, between 2019 and 2024, FHCRC received 18,234 tenant/landlord complaints, the majority of which were related to notices, lease/rental agreements, repairs, and rental assistance.

### 4.2 National Origin

The Fair Housing Act and the California Fair Employment and Housing Act prohibit discrimination based upon national origin. According to the United States Department of Justice, such discrimination can be based either upon the country of an individual’s birth or where his or her ancestors originated. Between 2019 and 2024, approximately 7 percent of housing discrimination complaints filed with the FHCRC by Riverside residents cited national origin as the basis. HUD reported that 3 out of the 48 housing discrimination complaints filed during this period (6 percent) were also based on national origin.<sup>4</sup>

Foreign-born population includes anyone who is not a U.S. citizen or a U.S. national at birth, including respondents who indicated they were a U.S. citizen by naturalization or not a U.S. citizen. **Table 30** indicates that Riverside’s foreign born population consists of approximately 70,262 persons. Of this total number, the majority are from Latin America (69 percent) and Asia (24 percent).

Table 30: Foreign Born Population by Region of Birth		
Region	#	%
Europe	2,462	3.5%
Asia	16,547	23.6%
Africa	1,915	2.7%
Oceania	263	0.4%
Latin America	48,627	69.2%
Northern America	448	0.6%
Total	70,262	–
Source: 2018-2022 American Community Survey 5-year Estimates, Table B05002 Place of Birth by Nativity and Citizenship Status.		

### 4.3 Gender

Federal and State fair housing laws prohibit discrimination based on a person’s gender. The Department of Justice (DOJ) emphasizes that the Fair Housing Act prohibits housing discrimination based on gender. The DOJ has prioritized addressing sexual harassment in housing, noting that poor women with limited housing choices often feel forced to endure harassment to avoid eviction.<sup>5</sup>

<sup>4</sup> See Chapter 6: Private Sector Fair Housing Impediments Analysis  
<sup>5</sup> Source: United States Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, *The Fair Housing Act*, July 25, 2008, pages 2 and 3.

There are approximately 158,000 males and females each in the City of Riverside. Six percent of the City's female population report living alone while 5 percent of the City's male population reports living alone. Tenure by sex data is only available for single-male and single-female *family* households. ACS 2018-2022 estimates that single-male and single-female family households are more likely to be renters than owners (**Table 31**). Married couple families are the largest household type and the only group that is predominantly homeowners (69 percent). The second largest household type is persons living alone, which has a homeownership rate of almost 44 percent.

Table 31: Household Type by Tenure						
	Owner		Renter		Total	
	#	%	#	%	#	%
Family households	40,725	61.0%	26,051	39.0%	66,776	73.8%
Married-couple family	31,490	69.2%	14,048	30.8%	45,538	50.3%
Other family	9,235	43.5%	12,003	56.5%	21,238	23.5%
Male householder, no spouse present	3,211	49.0%	3,337	51.0%	6,548	7.2%
Female householder, no spouse present	6,024	41.0%	8,666	59.0%	14,690	16.2%
Nonfamily households	9,502	40.0%	14,262	60.0%	23,764	26.2%
Householder living alone	7,435	44.1%	9,411	55.9%	16,846	18.6%
Householder not living alone	2,067	29.9%	4,851	70.1%	6,918	7.6%
Total	50,227	55.5%	40,313	44.5%	90,540	100.0%

Source: 2018-2022 American Community Survey 5-Year Estimates, Table B25011: Tenure by Household Type (Including Living Alone) and Age of Householder.  
Note: The last column is the percentage of household type of all households – married couple families (45,538) as a percentage of all households (90,540).

Single-female households, especially renters, have high rates of poverty. Approximately 20 percent of single-female headed households earn incomes below the poverty level, compared to only 12 percent of all households (**Table 32**). This percentage is even higher for single-female renter householders (25 percent) and single-female householders with children. By contrast, only 13 percent of single-male householders earn incomes below the federal poverty line.

Table 32: Poverty Status for Single-Family Households by Tenure (2022)			
Household Type	Total	Below Poverty Level	% Below Poverty Level
Single female householder	14,690	2,850	19.4%
Owner	6,024	720	12.0%
Renter	8,666	2,130	24.6%
Single female householder, with children	8,924	2,321	26.0%
Single male householder	6,548	858	13.1%
Owner	3,211	246	7.7%
Renter	3,337	612	18.3%
Single male householder, with children	3,468	583	16.8%
All Households	90,540	11,178	12.3%

Sources: 2018-2022 American Community Survey 5-Year Estimates, Table B25011, B17019, B17017, B17012, B11005.



According to the FHCRC, sex/gender was the basis (6.9 percent) of housing discrimination complaints filed by Riverside residents between 2019 and 2024. According to HUD, between 2019 and 2024, three of the 48 persons who filed a housing discrimination complaint did so on the basis of sex.

FHCRC also reported that sexual harassment rose in Riverside County during the COVID-19 Pandemic. During this time, FHCRC filed two sexual harassment complaints with HUD and one sexual orientation complaint with the California Civil Rights Department (CRD), formerly known as the Department of Fair Employment and Housing (DFEH). According to the FHCRC, these three cases highlight a growing trend in the county where landlords, unable to evict tenants for non-payment, resort to other tactics and differential treatment, hoping tenants will vacate voluntarily. This behavior resembles constructive eviction, a legal term in property law describing situations where a landlord fails to fulfill their duties, rendering the property uninhabitable. In cases of sexual harassment or discrimination based on sexual orientation, these actions could be seen as constructive eviction, particularly when eviction moratoriums prevent legal evictions.

## 1. Victims of Domestic Violence

Victims of domestic violence are protected under both Federal and California fair housing laws. At the Federal level, the Fair Housing Act (FHA) prohibits discrimination based on sex, which includes protections for victims of domestic violence, requiring housing providers to make reasonable accommodations such as early lease termination or lock changes. Additionally, the Violence Against Women Act (VAWA) specifically safeguards victims of domestic violence, dating violence, sexual assault, and stalking residing in federally subsidized housing by prohibiting denial of housing assistance or eviction based on their victim status and allowing for emergency transfers to ensure safety.

In California, the Fair Employment and Housing Act (FEHA) extends protections against housing discrimination to victims of domestic violence, sexual assault, and stalking, also mandating reasonable accommodations. California Civil Code §1946.7 further allows victims to terminate their leases early without penalty upon providing proper notice and documentation, such as a restraining order or a police report. Both Federal and State laws require that housing providers maintain the confidentiality of information related to the victim's status and any accommodations requested or provided. These protections aim to provide stability and safety for victims of domestic violence, ensuring they have legal means to maintain their housing and seek safer living conditions.

Between 2017 and 2022, the California Department of Justice reported receiving 34,464 domestic-violence-related calls to law enforcement in Riverside County, averaging around 6,892 annually. Black/African American residents are disproportionately impacted by domestic violence, with higher rates two to three times higher than Hispanic and non-Hispanic White residents.<sup>6</sup>

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<sup>6</sup> Ruedas, G. Escobar, S. (2024). *Domestic Violence in Riverside County*. Riverside University Health System- Public Health, Epidemiology and Program Evaluation.

## 4.4 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. The Fair Housing Amendments Act of 1988 prohibits discriminatory housing practices based on familial status. In most instances, according to the United States Department of Justice, the Act prohibits a housing provider from refusing to rent or sell to families with children. The Act protects families with children less than 18 years of age, pregnant women, or families in the process of securing custody of a child under 18 years of age, and single-parent households.

About 40 percent of the City's 90,540 households have children under 18 years of age (**Table 33**). The majority of households with children (65 percent) are married-couple family households. About 25 percent of households with children are in single-female headed households.

<b>Table 33: Poverty Status by Household Type and for Households with Children</b>								
	Total		With Children		Below Poverty		Below Poverty (with Children)	
	#	%	#	%	#	%	#	%
Family households	66,776	73.8%	35,795	53.6%	5,986	9.0%	5,986	16.7%
Married-couple family	45,538	50.3%	23,403	51.4%	2,278	5.0%	2,278	9.7%
Other family	21,238	23.5%	12,392	58.3%	3,708	17.5%	2,904	23.4%
Single male householder	6,548	7.2%	3,468	53.0%	858	13.1%	583	16.8%
Single female householder	14,690	16.2%	8,924	60.7%	2,850	19.4%	2,321	26.0%
Nonfamily households	23,764	26.2%	-	-	5,192	21.8%	-	-
Householder living alone	16,846	18.6%	-	-	2,157	12.8%	-	-
Householder not living alone	6,918	7.6%	-	-	3,035	43.9%	-	-
Total	90,540	100.0%	36,041	39.8%	11,178	12.3%	-	-
Sources: 2018-2022 American Community Survey 5-Year Estimates, Table B25011, B17019, B17017, B17012, B11005.								
Notes: A nonfamily household is a householder living alone or with nonrelatives only. Unmarried couples households, whether opposite-sex or same-sex, with no relatives of the householder present are tabulated in nonfamily households.								

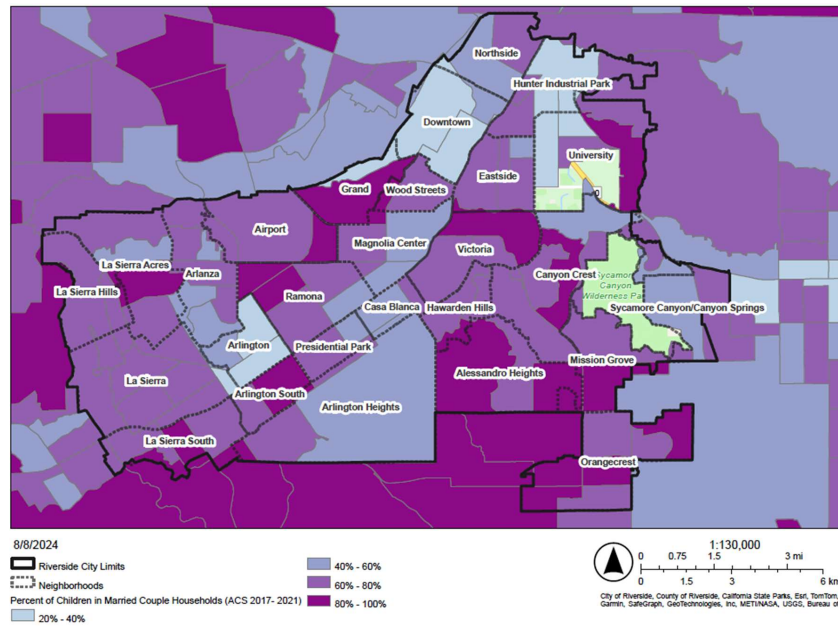
**Figure 7** shows a high percentages of children in married couple households throughout the City with some areas, especially in Alessandro Heights, Mission Grove, Canyon Crest, Victoria, Grand, and University neighborhoods, where more than 80 percent of children live in married couple households. The Victoria, Canyon Crest, Alessandro Heights, Mission Grove, and Orangecrest neighborhoods were developed after 1980 and consist almost exclusively of suburban tract housing.

By contrast, **Figure 8** shows that children in female headed households are concentrated in the Arlington, Arlington Heights, Downtown, and Hunter Industrial Park neighborhoods. 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.



According to the FHCRC, familial status was the basis of approximately 6 percent of housing discrimination complaints filed by Riverside residents between 2019 and 2024. According to HUD, between 2019 and 2024, four of the 48 persons (8.3 percent) who filed a housing discrimination complaint did so on the basis of familial status.<sup>7</sup>

**Figure 7: Percent of Children in Married Couple Households**



<sup>7</sup> See Chapter 6: Private Sector Fair Housing Impediments Analysis.

8/8/2024

**Riverside City Limits**

**Neighborhoods**

Percent of Children in Female Householder No Spouse Partner Present Households (ACS 2017-2021)

Less than 20%

20% - 40%

40% - 60%

0 0.75 1.5 3 mi

0 1.5 3 km

1:130,000

City of Riverside, County of Riverside, California State Parks, Esri, TomTom, Garmin, Satefy, GeoTechnologies, Inc, METRANSA, USDO, Bureau of

Single-parent households often require special consideration and assistance as a result of their greater need for affordable housing, as well as accessible day care, health care, and other supportive services. Due to their relatively lower per-capita income and higher living expenses such as day-care, single-parent households have limited opportunities for finding affordable, decent, and safe housing. In 2022, approximately 21,238 single-parent households resided within Riverside, representing 24 percent of the City's households (**Table 33**).

## Analysis of Impediments to Fair Housing Choice City of Riverside

## 2. Tenure by Familial Status

The need for fair housing services is directly correlated to size of the fair housing protected groups against whom housing discrimination is practiced. **Table 34** shows that about 40 percent of households, regardless of tenure, have children under the age of 18.

Renters are the group that makes most housing discrimination complaints. There are about 16,100 renter-household with children in the City. As noted earlier, familial status is the basis for approximately 6 percent of all housing discrimination complaints filed by Riverside residents to FHCRC and 8 percent of complaints to HUD.

Table 34: Tenure by Presence of Children (2022)						
Presence of Children	Owner	Percent	Renter	Percent	Total	Percent
With Related Children Under 18 Years	19,381	38.6%	16,082	39.9%	35,463	39.2%
No Related Children Under 18 Years	30,846	61.4%	24,231	60.1%	55,077	60.8%
Total	50,227	100.00%	40,313	100.00%	90,540	100.0%

Source: 2018-2022 American Community Survey 5-Year Estimates, Table B25012 Tenure by Families and Presence of Own Children.

## 3. Large Households

Large households are defined as those having five or more members. These households are usually families with two or more children or families with extended family members such as in-laws or grandparents. It can also include multiple families living in one housing unit to save on housing costs. Large households are a special needs group because the availability of adequately sized, affordable housing units is often limited. To save for necessities such as food, clothing, and medical care, lower- and moderate-income large households may reside in smaller units, resulting in overcrowding. Furthermore, families with children, especially those who are renters, may face discrimination or differential treatment in the housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex, confine them to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether, which would violate fair housing laws.

The 2018-2022 American Community Survey (ACS) found 17,917 large households in Riverside, representing approximately 20 percent of all households. Among the City's large households, 59 percent owned their own homes, while 41 percent were renter-households. According to the 2016-2020 CHAS data, of the City large family-households, 40 percent had lower- and moderate-incomes (less than 80 percent Area Median Income (AMI)). Approximately 58 percent of large renter-households earned lower and moderate incomes compared to 27 percent of large owner-households in the same income categories.

The housing needs of larger households are typically met through larger units. While the ACS shows that 29 percent of occupied housing units (26,106 units) in the City had four or more bedrooms, only a small portion of these units (17 percent) were occupied by renters. Since 20 percent of Riverside's households are large households, lower-income large renter households may have greater difficulty securing adequately sized units than other large renter households.

## 4.5 Persons with Disabilities

The Fair Housing Amendments Act of 1988 prohibits discriminatory housing practices based on handicap/disability status in all types of housing transactions. Among other prohibitions, the Act is intended to prohibit the application of special restrictive covenants and conditional or special use permits that have the effect of limiting the ability of such individuals to live in the residence of their choice. In addition, the law prohibits applying one standard to one class of individuals while applying a different standard to another class of individuals. For example, it would be illegal to ask an individual with a disability applying for an apartment to provide a credit report if applicants without a disability do not have to provide one.

Other discriminatory practices in the private sector that limit fair housing options for individuals with disabilities often stem from property management policies. For instance, “denied reasonable modification/ accommodation” is often cited as an alleged act in housing discrimination complaints. Additionally, apartment rental ads often state “no pets allowed,” even though disabled persons may have service or companion animals. In the public sector, housing opportunities can be impeded because a community has not adopted a reasonable accommodation procedure, or if adopted has not made the procedure widely known in the community. According to the FHCRC, disability was the basis for almost 50 percent of all housing discrimination complaints filed by Riverside residents between 2019 and 2024. According to HUD, 18 of the 48 housing discrimination complaints filed did so on the basis of disability. Chapter 6 evaluates property management practices in detail.

Of the civilian noninstitutionalized an estimated 33,824 (11 percent) have a disability (**Table 35**). White, non-Hispanic residents, and Hispanic/Latino residents make up the majority of the City’s population with a disability. Also, seniors (over 65 years old) make up 41 percent of the City’s population with a disability. One in four households (23,711 households) has a member with a disability. **Table 35** also shows that the most common disabilities among the population with a disability are ambulatory difficulties, cognitive difficulties, and independent living difficulties.

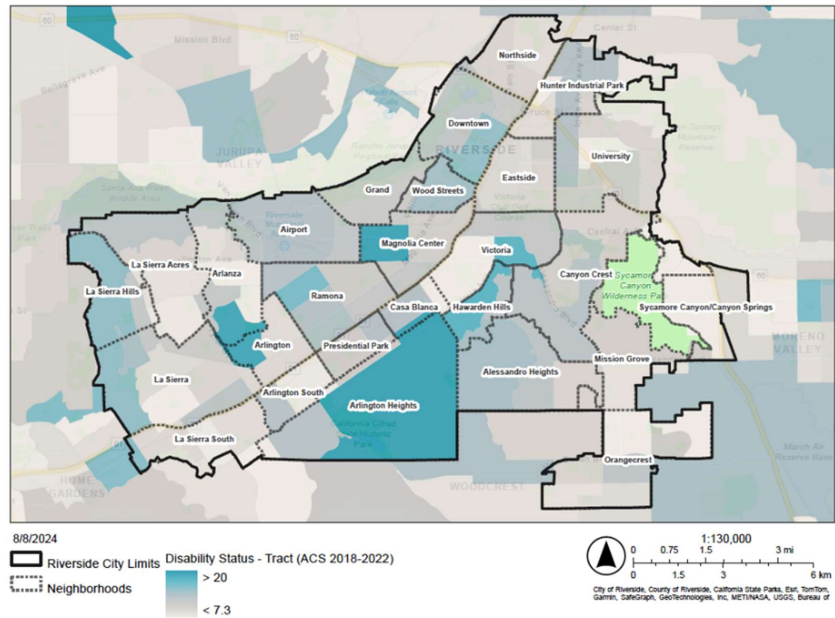
Table 35: Characteristics of Population with a Disability (2022)		
	With a Disability	% of Population with a Disability
Total civilian noninstitutionalized population	33,824	100.0%
Race/Ethnicity		
White alone	18,121	53.6%
Black or African American alone	2,500	7.4%
American Indian and Alaska Native alone	455	1.3%
Asian alone	2,537	7.5%
Native Hawaiian/Other Pacific Islander alone	209	0.6%
Some other race alone	6,555	19.4%
Two or more races	3,447	10.2%
White alone, not Hispanic or Latino	12,905	38.2%
Hispanic or Latino (of any race)	14,708	43.5%

Table 35: Characteristics of Population with a Disability (2022)		
	With a Disability	% of Population with a Disability
<b>Age</b>		
Under 5 years	196	0.6%
5 to 17 years	2,595	7.7%
18 to 34 years	5,620	16.6%
35 to 64 years	11,599	34.3%
over 65 years old	13,814	40.8%
<b>Disability Type1</b>		
With a hearing difficulty	8,585	25.4%
With a vision difficulty	5,999	17.7%
With a cognitive difficulty	13,532	40.0%
With an ambulatory difficulty	16,930	50.1%
With a self-care difficulty	7,816	23.1%
With an independent living difficulty	13,168	38.9%

Source: 2018-2022 American Community Survey 5-Year Estimates, Table S1810 Disability Characteristics  
Notes: 1. Persons with a disability can have more than one type of disability and be classified within more than one of the categories listed. Percentage taken from the total population with a disability.

Census tracts with higher percentages of persons with disabilities are scattered throughout the City and not concentrated in one area, though they are highest (relative to other tracts in the city) in southern Arlanza/Northern Arlington, Arlington Heights, and Magnolia Center.

Figure 9: Percent Population with a Disability



Riverside is home to a vibrant and active deaf community, with the presence of the California School for the Deaf, Riverside (CSDR). The CSDR provides comprehensive education and support services for deaf and hard-of-hearing students from preschool through high school, fostering a strong sense of community and pride. Additionally, Riverside hosts various social, cultural, and advocacy events aimed at promoting deaf culture and raising awareness about issues affecting the deaf community. The City's commitment to inclusivity is further demonstrated by the creation of the Commission of the Deaf in 2023. Duties of the new Commission of the Deaf include serving in an advisory capacity to help create an integrated community that promotes full participation in society, education and employment, effective communication, and cultural awareness; reviewing community policies, programs, and actions which affect persons within the deaf community and make appropriate recommendations to City Council; render advice and assistance as requested to other City boards, commissions, and City departments on matters affecting members of the deaf community; and performing other functions, community outreach, and duties as may be directed by the City.

Four factors – affordability, design, location, and discrimination – significantly limit the supply of housing available to persons with disabilities. The most pressing need for persons with disabilities is housing that accommodates the nature of their disability. Most single-family homes are inaccessible to people with mobility and sensory limitations. Conventional housing often does not feature widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features necessary for accessibility. The cost of retrofitting a housing unit often prohibits disabled individuals from buying a home, even among those who could otherwise afford one.

The location of housing is also a factor for individuals with mobility-related disabilities, as they often rely upon public transportation. Transportation services for persons with disabilities are typically provided by public and private agencies. The City's Special Transportation Division manages the Riverside Connect Program. Riverside Connect is an origin-to-destination advanced reservation transportation service for seniors and persons with disabilities.

Understanding the employment status of people with disabilities may also be an important component in evaluating specialized housing needs. In Riverside, only 26 percent of the population with a disability is employed, which is far lower than the 61 percent employment rate among those without disabilities. This data indicates housing units that are universally accessible will also need to be affordable given disabled individuals' limited employment status and incomes.

## 1. Persons with Developmental Disabilities

SB 812, which took effect January 2011, amended State Housing Element Law to require the analysis of the persons with disabilities to include an evaluation of the special housing needs of persons with developmental disabilities. A "developmental disability" is defined as a disability that originates before an individual becomes 18 years old, continues or can be expected to continue indefinitely, and constitutes a substantial disability for that individual. This includes intellectual disability, cerebral palsy, epilepsy, and autism.

Many persons with developmental disabilities can live and work independently within a conventional housing unit. More severely disabled individuals often require a group living environment, however, where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The U.S. Census does not have specific information regarding persons with developmental disabilities. However, each nonprofit regional center contracted with the California Department of Developmental Services maintains an accounting of the number of persons served. The Inland Regional Center serves persons in the City of Riverside, as well as other cities in the Inland Empire. As of December 2021, the Inland Regional Center served 3,802 individuals with developmental disabilities residing in Riverside County. About 47 percent of clients are under the age of 18, and the majority of clients live at home with a parent, family, or guardian.

## 4.6 Religion

The Fair Housing Act specifically protects individuals from religious discrimination in housing. For example, if a Jewish tenant requests to place a mezuzah on their doorpost, or a Muslim tenant needs a designated prayer area, the landlord must accommodate these requests unless they pose a significant burden. Similarly, tenants are allowed to display religious symbols, like crosses or shrines, in their homes or on their doors. The Act also requires landlords to address any harassment tenants face due to their religious practices, ensuring they can observe their faith without fear of discrimination.

The U.S. Census Bureau and American Community Survey do not collect data on religion. Religious data in the United States is typically gathered by private organizations and research institutions and is limited at the City level. The most recent data available for the Riverside County area was gathered by the Association of Religion Data Archives (ARDA). According to ARDA, in 2020 approximately 44.2 percent of the County's population (1.1 million) were adherents<sup>8</sup> of a religious body. Of these adherents, the majority were Catholic (61 percent), followed by Evangelical Protestant (21 percent), Latter-day Saints (5 percent), Jehovah's Witnesses (4 percent), and Black Protestant (3 percent).

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<sup>8</sup> Adherents include full members, non-member children, and other regular participants who are not considered members. Surveyors (Association of Statisticians of American Religious Bodies, ASARB) ask participating religious bodies to provide or estimate the number of these adherents.

## 4.7 Senior-Headed Households

Senior-headed households are considered special needs groups due to their relatively low incomes, disabilities or limitations, and dependency needs. The senior age range includes individuals over 65 years of age.<sup>9</sup> This group has four main concerns: limited and often fixed income; poor health and associated high healthcare costs; mobility limitation and transit dependency; and high costs of housing.

According to ACS data collected between 2018 and 2022, households headed by seniors (age 65+) represented approximately 21 percent of all Riverside households (**Table 36**). Of these, the majority (73 percent) owned their homes, while the remaining 27 percent rented. Additionally, about 14 percent of the City’s households consist of seniors living alone, with about 40 percent of these senior-headed households renting. Many seniors have a disability; roughly 40 percent of Riverside’s noninstitutionalized senior population had one or more disabilities according to ACS data collected during the same period.

The need for housing for senior individuals will likely increase as the City’s number of senior-headed households continues to grow. It will therefore be particularly important for the City to promote housing types that accommodate senior lifestyles and incomes.

**Table 36: Senior Headed Households by Tenure**

	Owner		Renter		Total	
	#	%	#	%	#	%
Householder 65 years or over	14,000	73.2%	5,116	26.8%	19,116	21.1%
Householder over 65 year living alone	4,085	59.7%	2,759	40.3%	6,844	13.6%

Source: 2018-2022 American Community Survey, Table B25007 Tenure by Age of Householder and Table B25011 Tenure by Household Type (Including Living Alone) and Age of Householder.  
Notes: Total column percentages calculate the percent from all households – 90,540. (i.e., the percent of all households (90,540) that are headed by householder over 65 years or older (19,116).

## 4.8 Limited English Proficiency (LEP)

According to HUD’s Office of General Counsel (OGC), people with limited English proficiency are not a protected class under the Fair Housing Act. However, the OGC explains that there is a close link between Limited English Proficiency (LEP) and certain racial and national origin groups. Therefore, HUD advises that an analysis of people with LEP be included in the AI.

LEP refers to a person’s limited ability to read, write, speak, or understand English. Individuals who are LEP are not a protected class under the Act. Nonetheless, the Act prohibits housing providers from using LEP selectively based on a protected class or as a pretext for discrimination because of a protected class. The Act also prohibits housing providers from using LEP in a way that causes an unjustified discriminatory effect.

The American Community Survey defines a “limited English speaking household” as one in which **no** member 14 years old and over 1) speaks only English at home or 2) speaks a language other than English at home and speaks English “Very well.” This question identifies

<sup>9</sup> HUD definition of seniors is 62 years or older. However, Census data usually is available for persons 65 years or older.

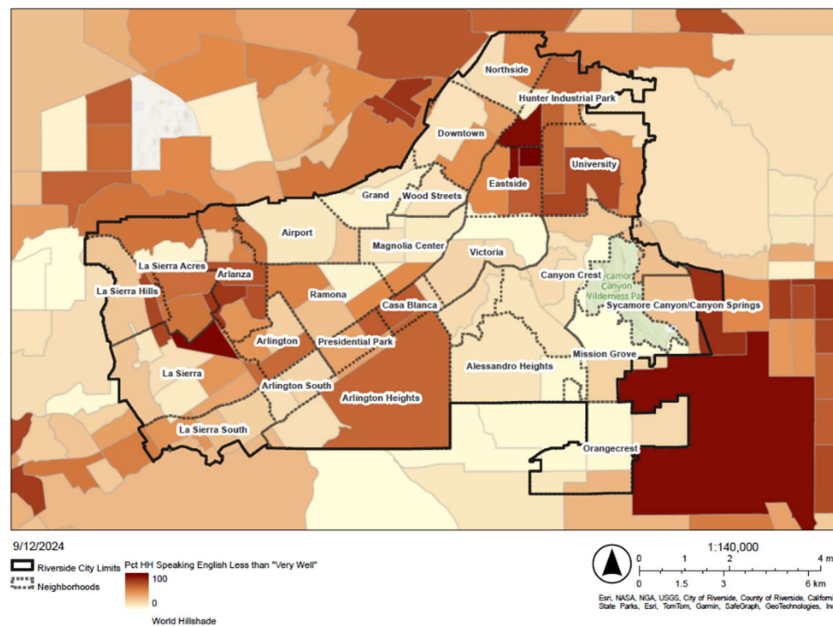


households that may need English-language assistance. Approximately 6,077 limited English speaking households reside in Riverside. Almost 68 percent are Spanish speaking, and 20 percent speak Asian and Pacific Island languages. Limited English speaking households comprise about 7 percent of all households living in the City. These limited English speaking households are concentrated in northern Riverside (Eastside, University, and Hunter Industrial Park) as well as in west Riverside (La Sierra Acres and Arlanza).

Table 37: Limited English Speaking Households (2022)		
	Limited English-Speaking Households	Percent of all Limited English-Speaking Households
Households Speaking:		
Spanish	4,106	67.6%
Other Indo-European Languages	503	8.3%
Asian and Pacific Island Languages	1,239	20.4%
Other Languages	229	3.8%
Total	6,077	100.0%

Source: 2018-2022 American Community Survey, Table S1602, Limited English Speaking Households

**Figure 10: Households Speaking English Less than “Very Well”**



### 4.9 Source of Income

In 2019, the State passed SB 329 and SB 222, expanding the source of income protection. Under SB 329 and SB 222, all landlords in California will be required to accept Section 8 and Veterans Affairs Supportive Housing (VASH) vouchers and other forms of rental assistance and to consider them as part of an applicant’s income. Both went into effect on January 1, 2020.

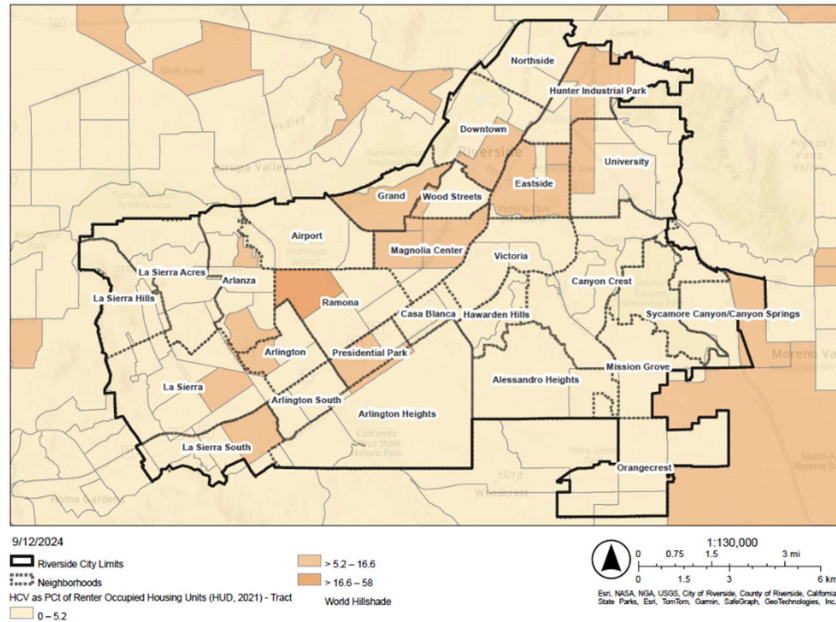
The City’s Housing Authority currently administers the Housing Choice Voucher (HCV) program, which assists 2,068 residents as of September 2024. Of these, 1,754 are supported through the Tenant Based Program, while 314 are supported through the Project Based Voucher Program. HCV recipients represent a diverse population, with a significant number of elderly and individuals with disabilities (**Table 38**). Approximately 56 percent of recipients are elderly, and 53 percent have a disability. Black residents are overrepresented among HCV recipients, making up 33 percent of the pool despite only representing 5 percent of the City’s overall population.

To ensure fair housing compliance, the Housing Authority refers voucher holders to the Fair Housing Council of Riverside County for guidance. Additionally, the Housing Authority offers the Family Self-Sufficiency Program to help participants achieve self-sufficiency. The current waitlist for HCV assistance is substantial, with 144,350 individuals registered, and wait times are influenced by funding availability and applicant preferences.

Table 38: Demographic Profile of Housing Choice Voucher Recipients		
	Number of Recipients	Percent of Recipients
Special Needs		
Elderly (62 years or older)	1,149	56.4%
With a disability	1,069	52.5%
Race		
American Indian/Alaska Native	41	2.0%
Asian	76	3.7%
Black/African American	665	32.6%
Native Hawaiian/Other Pacific Islander	24	1.2%
White	1,232	60.5%
Other	30	1.5%
Ethnicity		
Hispanic	712	34.9%
Non-Hispanic	1,356	66.5%
Total	2,068	101.5%
Source: Riverside Housing Authority, September 2024.		

Geographically, HCV recipients are concentrated in neighborhoods in northern Riverside (Downtown, Eastside, Hunter Industrial Park, University, Magnolia Center and Grand) and are most concentrated in west Ramona. Most notably, HCV recipient is less prevalent in southern Riverside, in areas that have been identified as racially concentrated areas of affluence and higher resources (see the Public/Private Sector Analysis of Impediments).

**Figure 11: Housing Choice Voucher Use Distribution**



Between 2019 and 2023, FHCR received 14 discrimination complaints specifically citing source of income protection. Notably, the number of such complaints increased significantly in recent years, with four and six complaints filed in FY 2022 and FY 2023, respectively. This is a sharp rise from the previous years, which typically saw only one or two complaints.

#### 4.10 Persons Experiencing Homelessness

According to United States Department of Housing and Community Development (HUD), the homeless population includes:

- Individuals and families who lack a fixed, regular, and adequate nighttime residence, including individuals who are exiting an institution where they resided for 90 days or less and who resided in an emergency shelter or a place not meant for human habitation immediately before entering that institution;
- Individuals and families who will imminently lose their primary nighttime residence;
- Unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition; or

- Individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member

According to the City's 2023 Point in Time Homeless Count, the total homeless count was 977 individuals, with the majority (62 percent) unsheltered. Additional information about Riverside's homeless characteristics is presented in the table below.

Table 39: Riverside Homeless Characteristics (2023)		
Category	#	% City Count
<b>Age</b>		
Children (≤17)	6	1.0%
Youth (18-24)	36	6.0%
Adults (25-34)	517	85.5%
Adults (65+)	46	7.6%
<b>Living Situation</b>		
Abandoned Building	18	6.5%
Bus Station	4	1.5%
Encampment	31	11.3%
Park	21	7.6%
Street	116	42.2%
Tent/Shed	38	13.8%
Tiny Home (without basic amenities)	2	0.7%
Under Bridge	6	2.2%
Vehicle	39	14.2%
Other	0	0.0%
<b>Primary Reason for Homelessness (interview only)</b>		
Family Disruption	70	25.5%
Domestic Violence	7	2.5%
Jail Release	17	6.2%
Lack of Income	44	16.0%
Medical Discharge	1	0.4%
Mental Illness	14	5.1%
Runaway	6	2.2%
Substance Abuse	20	7.3%
Unemployment	26	9.5%
Other	47	17.1%
<b>Challenges / Barriers (interview only, not mutually exclusive)</b>		
Chronic Health Issue	54	19.6%
Domestic Violence	21	7.6%
HIV AIDS	1	0.4%
Mental Health Issue	63	22.9%
Physical Disability	57	20.7%
PTSD	77	28.0%
Substance Abuse	85	30.9%
Traumatic Brain Injury	45	16.4%
Developmental Disability	37	13.5%

Table 39: Riverside Homeless Characteristics (2023)		
Category	#	% City Count
Special Interest Questions		
Households w/ Children	1	0.4%
Chronically Homeless (generated based on qualifying responses)	127	46.2%
First Time Homeless (self-report)	82	29.8%
Pet Owner	49	17.8%
Foster Care Experience	5	1.8%
Formerly Incarcerated	47	17.1%
Health Insurance Coverage	173	62.9%
Veterans (extrapolated)	60	21.8%
Source: Riverside County 2023 Homeless Point-in-Time Count and Survey.		
Notes: Age calculations based on total homeless count (977 persons). All other categories based on interviews (265 unsheltered persons).		

In October 2022, the City of Riverside adopted the Riverside Homeless Action Plan. The plan sets forth specific goals aimed at preventing homelessness, increasing housing production with a focus on affordability, enhancing the availability of services for physical and mental health and substance use disorder treatment, improving the availability and effectiveness of emergency shelters, creating a coordinated regional infrastructure of services, and expanding public awareness.

Each goal includes specific progress targets. For instance, the housing production goal aims to increase the inventory of affordable housing units by five percent and maintain 90 percent of expiring affordable housing covenants. In terms of service enhancement, the target is to reduce chronic homelessness by 5 percent and homelessness among individuals struggling with substance abuse by 5 percent. For emergency shelters, the goal is to increase the number of emergency shelter beds by 25 percent in 2023 and reduce the number of unsheltered individuals by 10 percent.

The plan was reviewed and commented upon during several community meetings to gather input from low-income residents at risk of becoming homeless, service providers working with currently homeless individuals, and those who have experienced homelessness in the past. This feedback process will continue throughout the implementation of the plan to ensure its relevance to changing conditions.

## 5. Public Sector Impediment Analysis

Public policies established at the regional and local levels can affect housing development and therefore may have an impact on the range and location of housing choices available to residents. Fair housing laws are designed to encourage an inclusive living environment and active community participation. This section presents an overview of government regulations, policies, and practices enacted by the City that may impact fair housing choice.

### 5.1 Housing Development Policies and Programs

The General Plan of a jurisdiction establishes a vision for the community and provides long-range goals and policies to guide the development in achieving that vision. Two of the eight State-mandated General Plan elements – Housing and Land Use Elements – have direct impact on the local housing market in terms of the amount and range of housing choice. The Zoning Ordinance, which implements the Land Use Element, is another important document that influences the amount and type of housing available in a community – the availability of housing choice.

#### 1. Housing Element Law and Compliance

As one of the State-mandated elements of the local General Plan, the Housing Element is the only element with specific statutory requirements and is subject to review by the State Department of Housing and Community Development (HCD) for compliance with State law. Housing Element law requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law acknowledges that, for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. Specifically, the Housing Element must:

- Identify adequate sites which will be made available through appropriate zoning and development standards and with services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels in order to meet the community's housing goals;
- Assist in the development of adequate housing to meet the needs of extremely low-, lower- and moderate-income households;
- Address, and where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing;
- Conserve and improve the condition of the existing affordable housing stock; and
- Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and

other characteristics protected by the California Fair Employment and Housing Act, or any other state and federal fair housing laws.

Specifically in 2017, the State passed AB 686, requiring the Sixth Cycle Housing Element update (covering the 2021-2029 planning period) to include an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions to affirmatively further fair housing.

#### *Compliance Status*

A Housing Element found by HCD to be in compliance with State law is presumed to have adequately addressed its policy constraints. According to HCD, as of September 26, 2022, the City's Adopted Sixth Cycle Housing Element meets statutory requirements of State Housing Element Law (Government Code, § 65580 et seq).

## **2. Land Use Element**

The Land Use Element of a General Plan designates the general distribution, location, and extent of uses for land planned for housing, business, industry, open space, and public or community facilities. As it applies to housing, the Land Use Element establishes a range of residential land use categories, specifies densities (typically expressed as dwelling units per acre [du/ac]), and suggests the types of housing appropriate in a community. Residential development is implemented through the zoning districts and development standards specified in the jurisdiction's Zoning Ordinance.

#### *Residential Densities*

Multiple factors, governmental and non-governmental, affect the supply and cost of housing in a local housing market. The governmental factor that most directly influences these market conditions is the allowable density range of residentially designated land. In general, higher densities allow developers to take advantage of economies of scale, reduce the per-unit cost of land and improvements, and reduce developments costs associated with new housing construction. Reasonable density standards ensure the opportunity for higher-density residential uses to be developed within a community, increasing the feasibility of producing affordable housing. Minimum required densities in multi-family zones ensure that land zoned for multi-family use, the supply of which is often limited, will be developed as efficiently as possible for multi-family uses.

Riverside's General Plan Land Use designations that allow residential uses are summarized in **Table 40**. In addition to the residential land use categories, the City has adopted multiple Specific Plans that contain additional residential land use categories or districts. State law requires a local government to make a finding that a density reduction, rezoning, or downzoning is consistent with its Housing Element prior to requiring or permitting a reduction of density of a parcel below the density used in determining Housing Element compliance. The legislation also allowed courts to award attorneys' fees and costs if the court determines that the density reduction or downzoning was made illegally.

Table 40: Residential Land Use Designations Allowing Housing			
General Plan Land Use Category	Corresponding Zone Districts	Max Density (du/ac)	Type of Residential Development Allowed
Agricultural/Rural Residential	RA-5	0.20	Residential agriculture
Hillside Residential	RC	0.63	Residential conservation
Semi-Rural Residential	RR RE R-1-1/2acre	3.3	Rural residential, residential estate, single-family
Very Low Density Residential	RE R-1-1/2 acre	3.2	Residential estate, single family
Low Density Residential	RR RE R-1-1/2 acre R-1-13000 R-1-10500	6.0	Rural residential, residential estate, single-family
Medium Density Residential	RE R-1-1/2 acre R-1-13000 R-1-10500 R-1-8500 R-1-7000 MH	8.0	Residential estate, single-family. Mobile home park
Medium High Density Residential	R-1-7000 R-3-4000 R-3-3000	14.5	Single-family and multi-family
High Density Residential	R-3-4000 R-3-3000 R-3-2500 R-3-2000 R-3-1500	29	Multi-family
Very High Density Residential	R-4	40	Multi-family
Downtown Specific Plan	DSP	Various	Mixed-use
Orangecrest Specific Plan	OSP	Various	Mixed-use
Mixed-Use- Neighborhood	MU-N R-1-13000 R-1-10500 R-1-8500 R-1-7000	10 du/ac, and 1.0 FAR/acre	Mixed-use, single-family
Mixed-Use – Village	MU-V R-3-4000 R-3-3000 R-3-2500 R-3-2000 R-3-1500 R-4	30/401 du/ac, and 2.5 FAR/acre	Mixed-use, multi-family
Mixed Use- Urban	MU-U R-3-4000 R-3-3000 R-3-2500 R-3-2000 R-4	40/601 du/ac, and 4.0 FAR/acre	Mixed-use, multi-family
Agriculture	RA-5	0.20	Residential agriculture

Source: City of Riverside, 2021-2029 Housing Element.



The relative amounts of single- and multi-family zoned land is a fair housing concern because communities that are predominantly or exclusively single-family limit the range of available housing choices, and, as a consequence, may adversely impact fair housing protected groups such as racial minorities and disabled people. **Table 41** shows that 6.1 percent of the residential acreage is designated for multi-family housing in the MHDR, HDR and VHDR Zones. With the rezoning that occurred along the Housing Element adoption in August 2022, increased capacity (approximately 400 acres) was made available to accommodate additional housing opportunities.

Table 41: Residential Land Use Acreage Distribution			
Residential Land Use Category		Net Acreage in the City	Percent of Residential Acres
A/RR	Agricultural/Rural Residential	5,116	19.1
HR	Hillside Residential	4,061	15.2
SRR	Simi-Rural Residential	1,227	4.6
VLDR	Very Low Density Residential	1,327	5.0
LDR	Low Density Residential	2,563	9.6
MDR	Medium Density Residential	10,877	40.6
MHDR	Medium High Density Residential	665	2.5
HDR	High Density Residential	856	3.2
VHDR	Very High Density Residential	108	0.4
Total		26,800	100.0

Source: Riverside General Plan 2025, Amended August 2019, Table LU-4, page LU-145

### 3. Zoning Ordinance

The Zoning Ordinance implements the General Plan by establishing zoning districts that correspond with General Plan land use designations. Development standards and permitted uses in each zoning district are specified to govern the density, type, and design of different land uses for the protection of public health, safety, and welfare (Government Code, §§65800-65863). Several aspects of the Zoning Ordinance that may affect a person’s access to housing or limit the range of housing choices available are described below.

As part of the Housing Element update, jurisdictions are required to evaluate their land use policies, zoning provisions, and development regulations, and make proactive efforts to mitigate any constraints identified. The following review is based on the current Zoning Ordinance as of the writing of this AI.

#### *Definition of Family*

A community can potentially restrict access to housing for households failing to qualify as a “family” by the definition specified in the Zoning Ordinance. For instance, a landlord may refuse to rent to a “nontraditional” family based on the zoning definition of a family. A landlord may also use the definition of a family as an excuse for refusing to rent to a household based on other hidden reasons, such as household size. Even if the code provides a broad definition, deciding what constitutes a “family” should be avoided by jurisdictions to prevent confusion or give the impression of restrictiveness.

California court cases<sup>10</sup> have ruled that a definition of “family” that: 1) limits the number of persons in a family; 2) specifies how members of the family are related (i.e., by blood, marriage or adoption), or 3) a group of not more than a certain number of unrelated persons as a single housekeeping unit, is invalid. Court rulings stated that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the jurisdiction, and therefore violates rights of privacy under the California Constitution. A Zoning Ordinance also cannot regulate residency by discrimination between biologically related and unrelated persons. Furthermore, a zoning provision cannot regulate or enforce the number of persons constituting a family.

The definition of family within the Zoning Code is, “any individual or group of individuals living together, in a dwelling unit as a single housekeeping unit. Family does not include larger institutional group living situations, such as in a boarding house or hotel/motel/long-term stay.” The City’s definition does not include limitations related to blood relation or number of unrelated persons and, therefore, does not limit the development of group housing for persons with disabilities.

#### *Density Bonus*

The City initially adopted density bonus provisions for affordable housing in accordance with Government Code §65915-65918 in 2007 and most recently updated the Density Bonus Ordinance in 2024. The City’s density bonus regulations are contained in Chapter 19.545 of the Zoning Code. These provisions facilitate the development of affordable housing by allowing for a density bonus and other regulatory concessions in exchange for the development of affordable housing units. Based on the number of units provided and the percentage designated for low-income, very-low income, or senior households, an applicant may request a density bonus and/or other concessions such as reductions in development standards or reductions in fees.

The 2021-2029 Housing Element Action Plan included an action to bring the City’s Density Bonus Ordinance into compliance with more recent changes to state law, including AB 1763 and AB 2345. The City completed amendments in 2022 and 2024 to comply with updated state law and will continue to monitor state density bonus law to ensure ongoing compliance with state requirements.

#### *Parking Requirements*

Communities that require an especially high number of parking spaces per dwelling unit can negatively impact the feasibility of producing affordable housing or housing for special needs groups by reducing the achievable number of dwelling units per acre, increasing development costs, and thus restricting the range of housing types constructed in a community. Typically, the concern for high parking requirements is limited to multiple-family, affordable, or senior housing. The basic parking standards for the City of Riverside are presented in **Table 42**.

When compared to other cities in the region, Riverside’s parking requirements are comparable and, in some cases, more lenient. For example, Riverside requires two spaces

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<sup>10</sup> *City of Santa Barbara v. Adamson* (1980), *City of Chula Vista v. Pagard* (1981), among others.

per unit for multi-family units with two or more bedrooms, where some cities may require 2.5 or more spaces per unit with three or more bedrooms. Additionally, Riverside does not require any guest parking for multi-family developments, further removing a constraint on achieving the maximum density for a multi-family project. Finally, the City has removed parking requirements altogether for ADUs, which is above and beyond what is required by State law.

Table 42: Parking Requirements	
Dwelling Type	Required Parking <sup>1</sup>
Single-family residential	Two parking spaces/unit, within a private garage
Accessory dwelling unit	None required
Multi-family residential	Studio: 1 space/unit
	1 Bedroom: 1.5 spaces/unit
	2 or more Bedrooms: 2 spaces/unit
	Rooms that can be used as bedrooms count as bedrooms. At least 75% of the total spaces must be within an enclosed garage or carport. Tandem parking may be provided when assigned to units with two or more bedrooms.
Group Housing	6 or fewer residents: Parking shall be provided consistent with the requirements for single-family or multi-family dwellings, dependent on the type of residential development in which the group housing is located.
	More than 6 residents: Determined by the designated Approving or Appeal Authority in conjunction with required land use or development permits, based on the impacts of the proposal and similar uses.
Assisted Living (7 or more clients)	0.5 parking spaces per bed
Transitional Housing / Supportive Housing	Parking shall be provided consistent with the requirements for single-family or multi-family dwellings, dependent on the type of residential development in which the transitional or supportive housing is located.
Emergency Shelters	Sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking than that for other residential or commercial uses within same zone.
Mobile Home Park	1 parking space per mobile home site plus 1 off-street guest parking space for every 5 mobile home sites
Single Room Occupancy	1 parking space/unit
Senior Housing	1 parking spaces/unit, of which 50% must be covered either in a carport or a garage
Student Housing	1.1 parking spaces per bed; or 0.5 space/bed if housing is located within ¼ mile of a major transit stop or campus.
Source: City of Riverside Zoning Code, 2024.	

The City has updated its parking requirements for emergency shelters to comply with the requirements of AB 139 that limit required parking to spaces needed to accommodate staff working at the shelter. Although the City's parking requirements for transitional housing and supportive housing are generally consistent with state requirements, AB 2162 contains special provisions for supportive housing located within one-half mile of transit. In this case, no parking is required. An additional zoning amendment is needed to comply with this requirement.

### Variety of Housing Opportunity

To ensure fair housing choice in a community, the City's Zoning Code should provide for a range of housing types, including single-family, multi-family, accessory dwelling units, mobile and manufactured homes, residential care facilities, emergency shelters, supportive housing, transitional housing, and single room occupancy (SRO) units. **Table 43** and **Table 44** provide a summary of Riverside's Zoning Ordinance as it relates to ensuring a variety of housing opportunities.

Table 43: Allowable Residential Uses in Residential Zones							
Residential Uses	Residential Zones						
	RC	RA-5	RR	RE	R-1	R-3	R-4
Traditional Housing							
Single-Family Dwelling Detached	P	P	P	P	P	P <sup>1</sup>	P <sup>1</sup>
Single-Family Dwelling Attached	X	X	P	P	P	P <sup>1</sup>	P <sup>1</sup>
Manufactured Dwelling	P	P	P	P	P	P	P
Mobile Home Park	-	-	With Overlay Zone			X	X
Accessory Dwelling Unit/ Junior Accessory Dwelling Unit	P	P	P	P	P	P	P
Multiple-Family (2 or more units)	X	X	X	X	X <sup>2</sup>	P	P
Live-Work	X	X	X	X	X	X	X
Planned Residential Development	PRD	-	PRD	PRD	PRD	X	X
Special Needs Housing							
Assisted Living (Residential Care Facility)	X	X	X	X	C	C	X
Boarding House	X	X	X	X	X	C	X
Caretaker Living Quarters							
Agricultural	-	C	MC	-	MC	-	-
Industrial Use & Commercial Storage	-	-	-	-	-	-	-
Temporary during Construction	TUP	TUP	TUP	TUP	TUP	TUP	TUP
Group Homes (6 or fewer persons)	P	P	P	P	P	P	P
Group Homes (7 or more persons)	X	X	C	C	C	X	X
Parolee/Probationer (6 or fewer persons)	X	X	MC	MC	MC	X	X
Parolee/Probationer (7 or more persons)	X	X	C	C	C	X	X
Senior Housing <sup>4</sup>	X	X	X	X	MC	P	P
Emergency Shelters (6 or fewer persons) <sup>3</sup>	X	X	MC	MC	MC	X	X
Emergency Shelters (7 or more persons) <sup>3</sup>	X	X	C	C	C	X	X
Sober Living Homes	P	P	P	P	P	P	P
Student Housing	X	X	X	X	X	C	C
Supportive Housing (6 or fewer persons)	P	P	P	P	P	P	P
Supportive Housing (7 or more persons)	P	P	P	P	P	P	P
Transitional Housing (6 or fewer persons)	P	P	P	P	P	P	P
Transitional Housing (7 or more persons)	P	P	P	P	P	P	P
Tiny Home Community (Foundation)	X	X	X	X	X	P	P
P Permitted by Right	1. Permitted as part of a PRD. 2. Legal existing duplexes built prior to the adoption of the Zoning Code are permitted in the R-1-7000 zone. 3. Emergency shelters are permitted by right in the Industrial Zone. 4. Age Restricted to 55+. 5. Group homes with 7+ persons cannot be permitted in the RA-5 and RC Zones as modifications to these zones require voter approval pursuant to Proposition R and Measure C.						
C Conditional Use Permit							
PRD Planned Residential Development Permit							
SP Site Plan Review Permit							
MC Minor Conditional Use Permit							
X Prohibited Use							
TUP Temporary Use Permit							
Source: City of Riverside Zoning Code							

Table 44: Allowable Residential Uses in Nonresidential Zones							
Residential Uses	Commercial				Mixed Use <sup>1</sup>		
	O	CR	CG	CRC	MU-N	MU-V	MU-U
<b>Traditional Housing</b>							
Single-Family Dwelling Detached	x	x	x	x	P	x	x
Single-Family Dwelling Attached	x	x	x	x	P	x	x
Manufactured Dwelling	x	x	x	x	P	x	x
Mobile Home Park	x	x	x	x	x	x	x
Accessory Dwelling Unit/Junior Accessory Dwelling Unit	x	x	x	x	P	P	P
Multiple-Family (2 or more units)	x	x	x	x	x	P	P
Live Work	x	x	x	x	P/MC	P/MC	P/MC
Planned Residential	x	x	x	x	x	x	x
<b>Special Needs Housing</b>							
Assisted Living	C	C	C	x	x	x	x
Boarding House	x	x	x	x	x	x	x
<b>Caretaker Living Quarters</b>							
Agricultural	x	x	x	x	x	x	x
Industrial Use/Commercial Storage	x	x	x	x	x	x	x
Temporary during Construction	TUP	TUP	TUP	TUP	TUP	TUP	TUP
Group Homes (6 or fewer)	x	x	x	x	P	P	P
Group Homes (7 or more)	C	C	C	C	x	x	x
Senior Housing <sup>3</sup>	x	x	x	x	MC	P	P
Emergency Shelters (6 or fewer persons) <sup>2</sup>	MC	MC	MC	x	x	x	x
Emergency Shelters (7 or more) <sup>2</sup>	C	C	C	x	x	x	x
Single Room Occupancy (SRO)	x	x	x	x	x	x	C
Sober Living Homes	x	x	x	x	P	P	P
Student Housing	x	C	C	x	x	C	C
Supportive Housing (6 or fewer clients)	MC	MC	MC	X	P	P	P
Supportive Housing (7 or more clients)	C	C	C	X	P	P	P
Transitional Housing (6 or fewer clients)	MC	MC	MC	X	P	P	P
Transitional Housing (7 or more clients)	C	C	C	X	P	P	P
Tiny Home Community <sup>4</sup>	C	C	C	C	C	C	C
Source: City of Zoning code, 2020 P = Permitted by right. C = Conditional Use Permit PRD = Planned Residential SP = Site Plan Review Required MC = Minor Conditional Use X = Prohibited Use TUP = Temporary Use Permit 1. Mixed-use is also allowed in the Downtown Specific Plan. 2. Shelters are permitted by right in the Industrial Zone. 3. Age Restricted to 55+. 4. Only permitted with a CUP when incidental to an Assemblies of People – Non-Entertainment use							

Commented [TM1]: Need another footnote – only permitted with a CUP when incidental to an Assemblies of People – Non-Entertainment use

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## Single- and Multi-Family Uses

Single- and multi-family housing types include detached and attached single-family homes, duplexes, town homes, condominiums, and rental apartments. The City's Zoning Code identifies a variety of zones where these uses are allowed. However, the Zoning Code implements "pyramid or cumulative zoning" because lower-density single-family uses are allowed in zones intended for higher density multi-family uses. Allowing or requiring a lower density use in a zone that can accommodate higher density uses is regulated by State law. Recent changes to the Housing Element law such as AB 1397 and SB 2292 (Adequate Sites), SB 166 and SB 330 (No Net Loss), and AB 678 (Housing Accountability Act) provide certainty regarding development density. For Housing Element sites to accommodate the lower income RHNA, a minimum density of 20 units per acre was established.

### Mobile Homes and Manufactured Housing

State law requires local governments to permit manufactured or mobile homes meeting federal safety and construction standards on a permanent foundation in all single-family residential zoning districts (Section 65852.3 of the California Government Code). Because these units can be a source of housing for lower-income individuals, including seniors and the disabled, overly restrictive regulation of these uses can indirectly impede housing choice.

The City allows the installation of manufactured homes certified under the National Manufactured Housing Construction and Safety Standards Act of 1974 on a foundation system, pursuant to §18551 of the Health and Safety Code, on lots zoned for conventional single-family residential dwellings. Such uses are not subject to any administrative, planning, or development process or requirement. The Riverside Zoning Code meets all legal requirements for mobile and manufactured housing types.

### Tiny Home Communities and Mobile Home Parks

Tiny home communities and mobile home parks allow for multiple single-family dwellings to be placed on one site. With smaller unit sizes, they provide another source of affordable housing, particularly for smaller lower income households. Per the Zoning Code, a tiny home is defined as: “a structure constructed on a chassis, intended for separate, independent living quarters that meets all of the following conditions:

- The unit cannot (and is designed not to) move under its own power;
- When sited on a parcel the wheels and undercarriage shall be skirted;
- No larger than allowed by California State Law for movement on public highways;
- Has at least 100 square feet of first floor interior living space;
- Is self-contained unit including basic functional areas supporting daily needs (cooking, sleeping, toiletry);
- Is designed and built to look like a conventional building structure;
- Shall be licensed and registered with the California Department of Motor Vehicles and meet the American National Standards Institute 119.5 or National Fire Protection Association 1192 requirements;
- Is served by underground utilities; and
- Is not a recreational vehicle as defined in the Zoning Code.

Tiny home communities with structures on a chassis are allowed with the approval of a conditional use permit in the RR, RE, R-1, and R-3 residential zones and all commercial and mixed-use zones, but only when configured as incidental uses to a primary Assemblies of People – Non-Entertainment use. Tiny home communities where the structures are placed on a permanent foundation are permitted within the R-3 and R-4 zones.

According to the Department of Finance, there were an estimated 2,227 mobile home units within the City of Riverside, several of which provide affordable housing for seniors. Mobile home parks are permitted in the RR, RE, and R-1 zones with a Mobile Home Park Overlay Zone and approval of a conditional use permit. The Zoning code requires that mobile home parks be at least 10 acres, have a maximum density of 10 units per acre, and comply with standards in accordance with Title 25 of the California Code of Regulations. The Zoning code establishes

setback standards for mobile home parks that are like the R-3 zone. The City has also worked with partners to rehabilitate and preserve the condition of viable mobile home parks.

### Accessory Dwelling Units

California law requires local jurisdictions to adopt ordinances that establish the conditions under which Accessory Dwelling Units (ADUs) are permitted. In response to changing State regulations, the City has updated its ADU provisions several times over the past few years, most recently in 2022. However, with multiple new ADU-related bills passed by the State legislature each year, the City's provisions need to be reviewed and updated once again for compliance with new provisions, most recently AB 2533 and SB 1211. Additionally, State regulations will continue to be monitored and future amendments to the City's Zoning Code made as necessary to remain in compliance.

### Caretaker's Living Quarters

Caretaker's living quarters can provide a significant source of affordable housing. The Zoning Code defines a caretaker's living quarters as a single-family dwelling unit as an accessory to an agricultural, professional, commercial, or industrial use for occupancy by the owner/caretaker. Caretaker's living quarters for industrial uses are permitted in three industrial zones (I, AI, and AIR) and the CS Overlay zone pursuant to a Minor Conditional Use Permit, where 24-hour onsite management is required. Within the industrial and commercial zones, the unit is limited to 650-square feet and 2 bedrooms and is covenant restricted to be occupied by the owner or employee of the business where the unit is located. Caretaker's living quarters associated with agricultural uses are permitted with a conditional use permit in the RA-5 zone and with a minor conditional use permit in the RR and R-1 zones with a minimum lot size of five acres.

### Senior Housing

The Riverside Zoning Code allows development of multi-family senior housing in zones that allow multi-family development. Senior housing developments are also subject to additional density bonuses and additional use allowances based on the zoning district. In addition, senior housing could be permitted in single-family residential zones as a group home or residential care facility of six or fewer or with a minor conditional use permit in R-1 zones.

### Farmworker Housing

The Residential Agricultural Zone (RA-5) is established to provide areas where general agricultural uses can occur independently or in conjunction with a single-family residence that preserves the agricultural character of the area. Currently, only Caretaker's Living Quarters (see discussions above) are identified as an accessory use conditionally permitted in the zone.

The Employee Housing Act requires the following: (1) Employee housing for six or fewer employees is considered and permitted similarly as a single-family residential use, (2) Farmworker housing for 36 beds or 12 units should be considered an agricultural use and permitted similarly as other agricultural uses in the same zone (such as the City's RA-5 zone). The 2021-2029 Housing Element included a program to amend the Zoning Code to implement

State requirements (Program 5-5). In November 2023, the City made amendments to the Zoning Code definition of “agricultural use” to include farmworker housing consistent with the Employee Housing Act; however, an amendment to clarify that employee housing for six or fewer employees is permitted as a single-family residence is still necessary. This provision of employee housing for six or fewer employees extends beyond the scope of farmworker housing but covers all employer-provided housing.

### Single Room Occupancy Housing (SRO)

AB 2634 amending the State Housing Element law also mandates that local jurisdictions address the provision of housing options for extremely low-income (ELI) households. Single-Room Occupancy (SRO) units provide a source of affordable housing for lower income individuals, including seniors, single workers, and persons that have recently experienced homelessness. The Zoning Code defines an SRO development as “a multi-unit housing development for very low income persons that typically consists of a single room and shared bath, also may include a shared common kitchen and common activity area.” SRO units typically do not require a move-in deposit and are leased monthly, further removing barriers for very low-income individuals.

Pursuant to SB 2 (2007), jurisdictions must include provisions for SRO development and are limited on the types of performance and development standards that they may impose on SROs. In 2018, as part of the implementation of the 2014-2021 Fifth Cycle Housing Element, the City adopted Ordinance No. 7408 which included provisions for SRO development. SRO projects are conditionally permitted in the MU-U zone. Chapter 19.401 of the Zoning Code contains site location, operation, and development standards for SROs which are consistent with State law.

### Student Housing

The City of Riverside has an extensive system of universities, colleges, and educational institutions and one of the largest populations of students in southern California. To accommodate the need for student housing, the Zoning Code allows student housing, fraternities and sororities, and dormitories with a conditional use permit in two residential zones (R-3 and R-4), two office and commercial zones (CR and CG), and two mixed-use zones (MU-V and MU-U). Thousands of student units are available in Riverside and developers are proposing additional units.

### Policies for Housing for Persons with Disabilities

#### Residential Care Facilities

The Lanterman Developmental Disabilities Services Act (§5115 and §5116 of the California Welfare and Institutions Code) declares that mentally and physically disabled persons are entitled to live in normal residential surroundings and that the use of property for the care of six or fewer disabled persons is a residential use for zoning purposes. A state-authorized, certified, or licensed family care home, foster home, or group home serving six or fewer persons with disabilities or dependent and neglected children on a 24-hour-a-day basis is considered a residential use that is permitted in all residential zones. No local agency can impose stricter zoning or building and safety standards on these homes (commonly referred



to as “group” homes) of six or fewer persons with disabilities than are required of the other permitted residential uses in the zone. The Lanterman Act covers only licensed residential care facilities.

To that end, the Health and Safety Code (§§1500 et seq.) requires that State-licensed residential care facilities serving six or fewer persons be (1) treated the same as a residential use, (2) allowed by right in all residential zones, and (3) treated the same with respect to regulations, fees, taxes, and permit processes as other residential uses of the same type in the same zone. Residential care facilities include but are not limited to residential facilities for the elderly, persons with developmental disabilities, and other state-licensed facilities.

The Zoning Code permits the above uses primarily under the term “group homes,” which is defined as, “any living situation including motels and hotel buildings that are not for temporary use, that accommodates unrelated individuals, and may include but not be limited to the following types of facilities: (1) licensed alcohol and drug treatment facilities; (2) licensed board and care homes for the elderly including convalescent or rest homes and nursing homes; (3) licensed homes for minor children; (4) licensed homes for mental patients; (5) licensed homes for the developmentally disabled; and (6) single- room occupancy (SRO) projects. Group housing would typically involve a living arrangement where either support services are provided to the occupants, where cooking, living or support sanitary facilities are shared in common between the occupants or where there is a formal program establishing rules of conduct and purpose of the facility.”

As required by State law, group homes serving six or fewer persons are permitted in all residential zones and all mixed-use zones as a by-right use. Larger facilities serving seven or more individuals are conditionally permitted in the RR, RE, and R-1 residential zones and the O, CR, CG, and CRC commercial zones. Besides general regulations, group homes serving seven or more persons are subject to a 300-foot separation from another group home (including an assisted living facility or shelter) and 1,000 feet from a parolee/probationer home. A group home shall have no more than 40 beds nor shall serve more than 40 clients at the same time (RMC Section 19.315.040).

The City, through its Zoning Code, defines group homes to include motels and hotels that are used for an extended stay, student dormitory, and other group housing situations. While not consistent with the State definition of group homes under the Lanterman Disabilities Services Act, the City’s approach is broader and permissible and helps the City achieve its housing goals. The City will review the zoning provisions for large group homes (i.e., seven or more occupants) and implement mitigating strategies to remove potential constraints to placing large group homes in Zoning districts that are constrained by voter-approved restrictions (i.e., RA-5 and RC). In order to provide clarity on which types of uses are permitted as residential care facilities, adding a definition for residential care facility and/or updating the definition for group homes and the other similar uses listed above has been added as a Program in the 2021-2029 Housing Element (Program 5-3).

### Emergency Shelters

An emergency shelter provides housing with minimal supportive services for homeless persons and is limited to occupancy of 6 months or less by a homeless person. No individual

or household may be denied emergency shelter because of an inability to pay (Health and Safety Code §50801[e]). Enacted in 2007, SB 2 requires local governments to identify one or more zones where emergency shelters can be permitted without approval of a discretionary permit. Further, the identified zone must have sufficient capacity to accommodate local shelter need and provide capacity for at least one year-round shelter, at a minimum. The City may require a ministerial permit where limited conditions may be applied; however, the local standards for emergency shelters must be objective and facilitate the development of this use.

In response to State regulations, the City created the Emergency Shelter (ES) Overlay Zone in 2010 where emergency shelters are permitted by-right. The ES Overlay Zone may be applied to the City's commercial zones and all residential zones, except for the RC and RA-5 zones. The City also has development standards which address lighting, parking, security, management, and number of beds; these standards remain flexible to allow proposals to be evaluated on a case-by-case basis. However, the ES Overlay requires the applicant to process a Zone Change to utilize the overlay provisions. In April 2021, the City amended the Zoning Code to eliminate the ES Overlay. Instead, emergency shelters are now a permitted use by-right in the City's Industrial Zone. The City's Industrial zones are located along major corridors and therefore offer access to public transportation and services.

Development standards applicable to emergency shelters include varying minimum separation requirements from other emergency shelter facilities, group housing, senior housing, schools, parks, businesses licensed for the sale of alcohol for consumption off-premises, which could constrain the development of this type of facility by reducing the number of locations where it is a use permitted by-right. To address this constraint, the 2021-2029 Housing Element contains a program to modify these minimum separation standards to further facilitate the provision of emergency shelters, in addition to updating parking standards to be consistent with maximum parking requirements per AB 139 (Program 5-8). These amendments were completed in 2024. Other standards contained in the Zoning Code relate to the operation of such facilities and are consistent with the requirements of State law, and therefore are not a constraint on this type of facility.

#### Low Barrier Navigation Centers

Adopted in 2019, AB 101 requires jurisdictions to permit Low Barrier Navigation Centers in mixed-use zones and other nonresidential zones permitting multi-family housing, provided they meet certain requirements. AB 101 defines a Low Barrier Navigation Center as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.” Low Barrier shelters may include options such as allowing pets, permitting partners to share living space, and providing storage for residents' possessions. The 2021-2029 Housing Element included Program 5-7 to adopt amendments for consistency with AB 101 and these amendments were completed in 2022.

### Transitional Housing

Transitional housing provides additional housing options for people with disabilities, a protected class of the population. Transitional housing facilities are intended to provide a stay of six months and up to two years during which residents are provided case management and other supportive services that prepare them to obtain and maintain housing and become self-sufficient. Transitional housing may be provided in a variety of forms, including in group homes, single-family residences, and multi-family residences. Pursuant to State law, transitional housing must be treated as a residential use and may only be subject to the restrictions that apply to other residential dwellings of the same type in the same zone.

The Zoning Code permits transitional housing by-right, regardless of size, in all residential and mixed-use zones. In the O, CR, and CG commercial zones, facilities serving six or fewer individuals require a minor conditional use permit and facilities serving more than six individuals require a conditional use permit.

### Supportive Housing

Supportive housing is defined as housing with no limit on length of stay that is occupied by a target population and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (California Health and Safety Code §50675.14 [b]). Target population means persons, including persons with disabilities, and families who are "homeless," as that term is defined by §11302 of Title 42 of the United States Code, or who are "homeless youth," as that term is defined by paragraph (2) of subdivision (e) of §11139.3 of the Government Code.

Like transitional housing, supportive housing may be provided in a group home setting, or within a single- or multi-family residential setting. The Zoning Code allows supportive housing by-right in all residential and mixed-use zones, and supportive housing facilities are only subject to the restrictions that apply to residential dwellings of the same type in the same zone. Small supportive housing facilities (six or fewer clients) are also permitted with a minor conditional use permit in the O, CR, and CG commercial zones. Large facilities (more than six clients) require a conditional use permit in these commercial zones.

The State Legislature adopted AB 2162 in 2018, which requires jurisdictions to permit supportive housing developments with 50 or fewer units by-right in zones where multi-family and mixed-use development is permitted, provided the development meets certain requirements. Further, cities may not impose parking requirements for supportive housing based on the number of units if they are located within one-half mile of a public transit stop. While the City's current Code is compliant with the requirement that larger facilities be permitted by-right in certain zones as described above, a zoning code amendment is necessary to clarify that parking is not required for supportive housing developments meeting the specific requirements of AB 21622 and within one-half mile of a public transit stop.

### Reasonable Accommodation

Both Federal and State fair housing laws require local governments to make reasonable accommodations in local zoning and land use regulations when such accommodations are

necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. Reasonable accommodations most commonly grant modifications or exceptions to development standards; for example, a setback modification to allow a wheelchair access ramp within the required front yard setback of a dwelling.

The City first adopted Chapter 19.850, “Fair Housing and Reasonable Accommodation,” in 2003 and most recently updated its Request for Reasonable Accommodation procedures in 2022. Prior to the most recent amendments, Requests for Reasonable Accommodation followed the same timeline as a Variance and were subject to the required approval findings for variances, in addition to the reasonable accommodation findings. The 2022 amendments revised the reasonable accommodations procedures and removed the requirement to make the variance approval findings.

Requests for Reasonable Accommodations are typically reviewed and approved by the Development Review Committee; however, the Committee may refer complex or controversial requests to the Planning Commission. To approve a Request for Reasonable Accommodation, the following findings must be made by the Development Review Committee:

- The persons who will use the subject property are protected under Fair Housing Laws;
- The requested exception to zoning law is necessary to make specific housing available to a dwelling occupant;
- The requested exception will not impose an undue financial or administrative burden on the City; and
- The requested exception will be in compliance with all applicable Building and Fire Codes and will not require a fundamental alteration of the zoning laws and procedures.

Decisions of the Development Review Committee or Planning Commission on Request for Reasonable Accommodation applications may be appealed to the City Council.

#### 4. Building, Occupancy, Health and Safety Codes

##### *Building Codes*

Building codes, such as the California Building Standards Code,<sup>11</sup> are necessary to protect public health, safety, and welfare. However, local codes that require substantial improvements to a building might not be warranted and deter housing construction and/or neighborhood improvement.

The California Building Standards Code is published every three years by order of the California legislature. The Code applies to all jurisdictions in the State of California unless otherwise annotated. Adoption of the triennial compilation of Codes is not only a legal mandate, it also ensures the highest available level of safety for citizens and that all construction and maintenance of structures meets the highest standards of quality.

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<sup>11</sup> California Building Code, adopted by the Building Standards Commission, is actually a set of uniform building, electrical, mechanical, and other codes adopted by professional associations such as the International Conference of Building Officials, and amended to include California-specific requirements.

The latest version of California Code of Regulations (2022 CBC), Title 24, the California Building Standards Code was adopted by the City of Riverside and became effective on January 1, 2023. As part of the adoption of the CBC, a city may adopt additional codes if it makes an express finding that such modification is reasonably necessary because of local climatic, geological, or topographical conditions (Health and Safety Code §17958.7). The City Council has adopted local amendments to address these specific local conditions, primarily related to fire suppression and protection; repair and reconstruction of damaged structures; seismic safety concerns; and noise insulation standards.

In addition, City adheres to federal laws that require at least 5 percent of publicly funded new units be accessible to persons with mobility impairments and an additional 2 percent of the units be accessible to persons with hearing or visual impairments. New multiple-family housing must also be built so that: 1) the public and common use portions of such units are readily accessible and usable by persons with disabilities; 2) doors allowing passage into and within such units can accommodate wheelchairs; and 3) all units contain adaptive design features.

The City has established a procedure for resolving the application of building codes and its impact on housing opportunities for people with disabilities. The City is charged with the responsibility to convene an Accessibility Appeals Board comprised of four members of the Planning Commission, plus three additionally designated persons with disabilities, at least two of whom shall be mobility impaired. This Board may conduct hearings on written appeals of decisions of the Building Official regarding accessibility issues and approve or disapprove interpretations and enforcement actions taken by the Building Official relating to access.

#### *Occupancy Standards*

In general, no State or federal regulations govern occupancy standards. The California Civil Rights Department (CRD) (formerly known as the Department of Fair Employment and Housing (DFEH)) uses the “two-plus-one” occupancy standard in considering the number of persons per housing unit – two persons per bedroom plus an additional person per unit. While CRD also uses other factors, such as the age of the occupants and size of rooms, to consider the appropriate standard, the two-plus-one rule is generally followed. Other guidelines are also used as occupancy standards – the California Fire Code and the California Housing Code. The Fire Code allows one person per 200 square feet of building floor area. The Uniform Housing Code outlined a standard of one person for every 50 square feet of bedroom space. These standards are typically more liberal than the “two-plus-one” rule.

The Zoning Code does not contain an occupancy standard or definitions of “dwelling unit” or “family” that could be interpreted as an occupancy standard that could be more restrictive than that established in the California Fire Code or CRD guidelines.

## **5. Development Fees**

The City of Riverside collects fees to process plans submitted for residential projects and to finance the provision of important services that are needed to accommodate housing and population growth. Some fees are collected to fund City services and infrastructure, while others are collected on behalf of and passed through to other agencies for similar purposes.

Fees and exactions are used to finance public facilities, roadways, water and sewer infrastructure, schools, and other community services.

As shown in **Table 45**, the total fees per unit for a typical 25-unit apartment project are \$26,862. For a similar project, but with affordable units and on a site that was previously developed, the per-unit fees are \$19,312. The total per unit fees for the 10-unit condominium project were \$36,296, indicating that the cost per unit generally goes down with the development of additional units. The cost for single-family units falls around \$49,897 per unit in subdivisions and is lower at \$44,792 for an infill unit.

While permit and development fees do represent a significant cost, they are necessary to expand and maintain infrastructure to support expanding residential development and to cover the City's costs of reviewing and processing permits. Riverside's development fees do not represent a greater constraint to housing development in comparison to other jurisdictions in the region. The Western Riverside Council of Governments conducted an Analysis of Development Impact Fees in Western Riverside County in 2016. The fee study showed that the average residential development impact fees in the region were \$28,314 per multifamily unit. Therefore, the per-unit fees indicated in Table H-1: Typical Housing Fees, ranging from \$19,312 to \$36,296, are generally comparable to the region. Riverside's permit fees are lower than average, when it is considered that the totals presented include actual construction cost for water and electricity service. Figure H-2: Development Fees shows the City's fees for permitting processes in 2020 that are often needed for residential construction including site plan review, conditional use permits, and variances. The Western Riverside County Council of Government's (WRCOG) Transportation Uniform Mitigation Fee (TUMF) program includes an exemption for affordable projects. The TUMF is typically the largest development fee for a project; therefore, the exemption is a significant incentive. Finally, developers proposing apartments or Planned Residential Developments (PRD) that contain units affordable to lower income residents can receive higher densities (and thereby project revenues) plus concessions for qualified projects through the Affordable Housing Density Bonus provisions. Density bonuses improve the financial feasibility of projects and create a third layer of financial benefits for developers.

<b>Table 45: Typical Housing Development Fees</b>					
	<b>25-Unit Multi-Family Apartment Project<sup>1</sup></b>	<b>25-Unit Multi-Family Apartment Project (Affordable)<sup>2</sup></b>	<b>10-Unit Condominium Project<sup>3</sup></b>	<b>30-Unit Single-Family Subdivision<sup>4</sup></b>	<b>Single Family Unit, Infill<sup>5</sup></b>
<b>Entitlement Fees</b>					
Design Review	\$3,560	\$3,560	\$3,560	\$3,560	-
Tentative Map	-	-	\$10,516	\$10,516	-
Preliminary WQMP Review	\$1,669	\$1,669	\$1,669	\$1,669	-
Landscape Design Review	\$919	\$919	\$919	\$1,407	\$488
<b>Permitting, Utilities Design and Construction<sup>9</sup></b>					
Building Plan Check (valuation based)	\$8,000	\$8,000	\$5,000	\$30,000	\$1,400
Grading Permit	\$4,100	\$4,100	\$4,100	\$15,200	\$2,700
Final Map Check	-	-	\$5,000	\$5,000	-
Final WQMP Plan Check	\$1,500	\$1,500	\$1,500	\$1,500	-

Table 45: Typical Housing Development Fees					
	25-Unit Multi-Family Apartment Project <sup>1</sup>	25-Unit Multi-Family Apartment Project (Affordable) <sup>2</sup>	10-Unit Condominium Project <sup>3</sup>	30-Unit Single-Family Subdivision <sup>4</sup>	Single Family Unit, Infill <sup>5</sup>
Sewer Permit	\$7,700	\$7,700	\$6,000	\$20,000	\$1,700
Storm Drain Fee	\$1,000	\$1,000	\$1,000	\$16,000	\$500
Sewer Connection Fee	\$91,000	\$91,000	\$36,000	\$129,000	\$4,300
Acreage Fee (Storm Drain Supplement)	\$900	\$900	\$500	\$4,500	\$150
Utility Plan Review Deposit	\$2,000	\$2,000	\$2,000	\$2,000	-
Water <sup>10</sup>	\$43,700	\$43,700	\$37,700	\$175,00	\$1,500
Electrical <sup>11</sup>	\$100,000	\$100,000	\$85,000	\$200,000	\$2,500
Development Impact and Permit Fees					
Local Park Fee	\$76,000	\$76,000	\$26,000	\$139,380	\$4,646
Regional Park Fee	\$5,500	\$5,500	\$3,000	\$27,445	\$850
Aquatic Park Fee	\$7,400	\$7,400	\$2,400	\$13,050	\$435
Traffic Impact Fee (City)	\$10,500	\$10,500	\$4,200	\$15,750	\$525
Traffic Signal Fee	\$3,100	\$3,100	\$1,300	\$5,700	\$190
Building Fee (valuation based)	\$8,000	\$8,000	\$5,000	\$30,000	\$1,400
TUMF (County) <sup>6</sup>	\$159,725		\$63,890	\$266,190	\$8,873
MSHCP (County) <sup>7</sup>	\$29,025		\$11,610	\$109,050	\$3,635
School Fees	\$100,250	\$100,250	\$40,100	\$255,000	\$8,500
Miscellaneous <sup>8</sup>	\$6,000	\$6,000	\$5,000	\$20,000	\$500
<b>Total</b>	<b>\$671,548</b>	<b>\$482,798</b>	<b>\$362,964</b>	<b>\$1,496,917</b>	<b>\$44,792</b>
<b>Total per Unit</b>	<b>\$26,862</b>	<b>\$19,312</b>	<b>\$36,296</b>	<b>\$49,897</b>	<b>\$44,792</b>
Source: City of Riverside, Planning Division, 2021 1. 25-unit multi-family apartment project on 1-acre site with 1,000 sf/unit 2. 25-unit affordable multi-family apartment project on 1-acre site with 1,000 sf/unit, developed on a site that was previously developed 3. 10-unit condominium project on 0.5-acre site with 1,000 sf/unit 4. Low-income housing projects may be exempt from this fee. 5. Projects on sites that were previously developed are exempt from this fee. 6. Miscellaneous permits/fees include fire permits, street tree fees, inspections, temporary power, issuance, imaging fees, etc. 7. The Utilities cost estimates assume standard rates and installation and do not account for additional costs that frequently occur based on the specific of a given site or project. Construction costs may double or triple those shown. 8. Includes fire service (6"), domestic service (2"), landscape service (2"), and other construction/installation costs. 9. Includes cost of typical design and construction.					

## Conclusions and Recommendations

The City has identified impediments within its planning and zoning policies that must be addressed to advance fair housing initiatives effectively. Amendments to the Zoning Code are necessary to align with State law, focusing on areas such as:

- Group Homes/Residential Care Facilities: Review and develop mitigating strategies to eliminate barriers for large group homes in restrictive Zoning districts (RA-5 and RC).
- Permanent Supportive Housing: A zoning code amendment is necessary to clarify that parking is not required for supportive housing developments within one-half mile of a public transit stop.

- Employee and Farmworker Housing: The Zoning Code currently does not address the requirements of the Employee Housing Act. Changes to the Zoning Code will allow the City to implement the State requirements.

## 5.2 Affordable Housing Development Policies and Programs

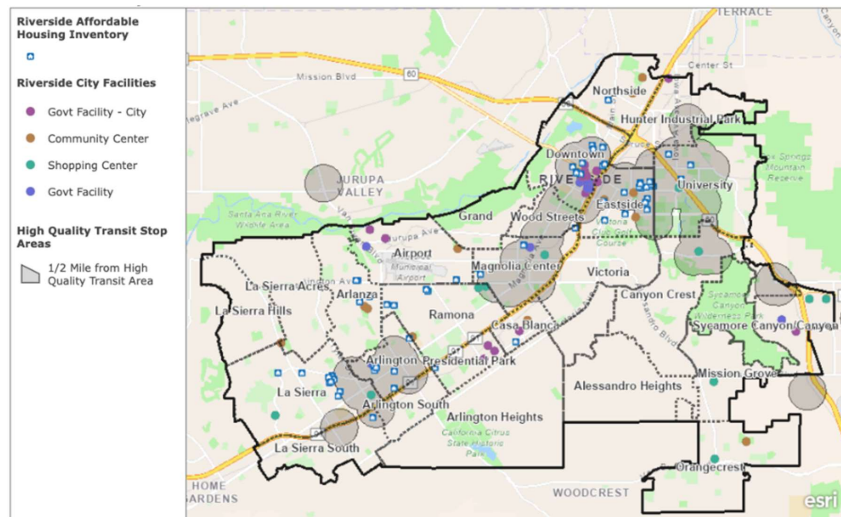
In general, many minority and special needs households are disproportionately affected by a lack of adequate and affordable housing in a region. While affordability issues are not directly fair housing issues, expanding access to housing choices for these groups cannot ignore the affordability factor. Insofar as rent-restricted or non-restricted low-cost housing is concentrated in certain geographic locations, access to housing by lower-income and minority groups in other areas is limited and can therefore be an indirect impediment to fair housing choice. Furthermore, various permit processing and development impact fees charged by local government results in increased housing costs and can be a barrier to the development of affordable housing. These issues are examined in the subsections below.

### 1. Siting of Affordable Housing

Riverside has 63 affordable housing developments, ranging in size from one to 268 housing units. These developments include senior housing, supportive housing, and project-based rental housing. As shown in **Figure 12** assisted housing is located throughout west and north Riverside. Most of these affordable housing developments are concentrated in northern and western Riverside where transit services and facilities (government facilities, community centers, and shopping centers) are concentrated.



**Figure 12: Assisted Housing Inventory and City Facilities**



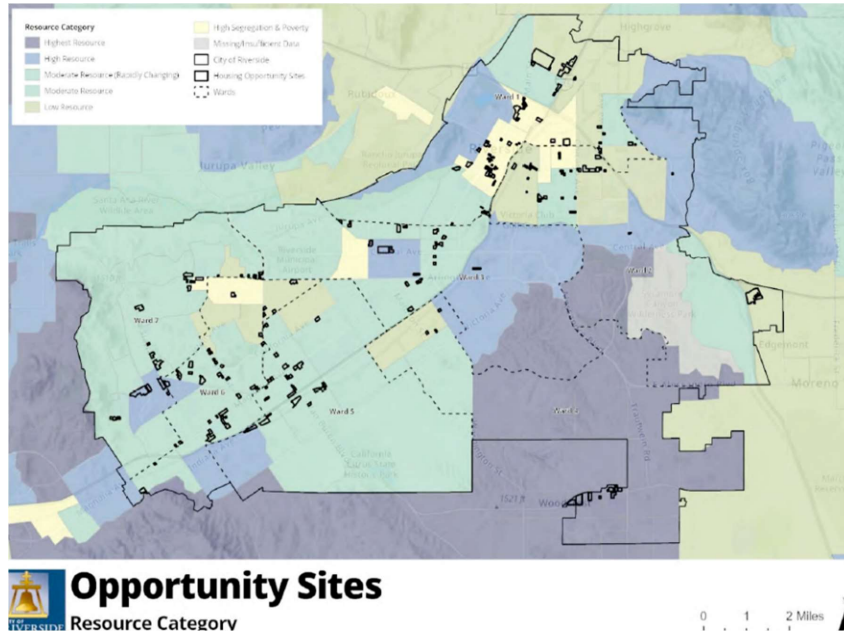
Oak Ridge National Laboratory (ORNL), National Geospatial-Intelligence Agency (NGA) Homeland Security Infrastructure Program (HSIP) Team HIFLD 2018, PlaceWorks 2022 | CHPC, PlaceWorks 2022, HCD 2022 | ACS, PlaceWorks 2022, HCD 2022 | U.S. Department of Housing and Urban Development | NCES EDGE | OEHA, CalEPA | ACS 2015 - 2019, HCD, PlaceWorks 2021 | CalTrans, PlaceWorks, HCD | U.S. Department of Housing and Urban Development, U.S. Census Bureau | U.S. Census, PlaceWorks 2022, HCD 2022 | U.S. Census 2021, PlaceWorks 2022, HCD 2022 | PlaceWorks 2021, HUD 2020 | California Urban Displacement Project 2022, PlaceWorks 2022, HCD 2022 | HUD, PlaceWorks 2022, HCD 2022 | SafeGraph, U.S. Census Bureau, Esri | City of Riverside, County of Riverside, California State Parks, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, USFWS

## 2. Sixth Cycle 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 Regional Housing Needs Allocation (RHNA), 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.

Sites were placed based on available vacant and underutilized properties throughout the city placing a high priority to the available sites in high resource areas. The built-out nature of the city along with the number of residential units needed to meet RHNA requirements limited the city's ability to be selective in the placement of sites which resulted in a concentration of sites in low resource areas. However, the city's RHNA sites strategy attempts to disperse the sites to offer opportunities in high resource areas. About 13 of the RHNA units are in the highest and high resources census tracts. Furthermore, the city's RHNA sites strategy provides a significant number of moderate-income units in the low resource areas. This would help to facilitate mixed-income neighborhoods. In addition, the city included policies and programs including those that serve to support fair housing through fair housing enforcement and programs to assist special needs groups in its 2021-2029 Housing Plan.

**Figure 13: Distribution of Sixth Cycle Sites Inventory by Resource Category**



**Table 46: Distribution of RHNA Sites**

TCAC Resource Category	Lower Income		Moderate Income		Above Moderate Income		All RHNA Units	
	#	%	#	%	#	%	#	%
Highest	0	0.0 %	970	7.7%	0	0.0 %	970	4.6%
High	259	3.1%	1,541	12.3%	0	0.0 %	1,800	8.6%
Moderate (Rapidly Changing)	143	1.7%	510	4.1%	0	0.0 %	653	3.1%
Moderate	3,113	37.0%	3,550	28.3%	31	55.4%	6,694	31.9%
Low	2,130	25.3%	4,237	33.8%	25	44.6%	6,392	30.4%
High Segregation and Poverty	2,763	32.9%	1,727	13.8%	0	0.0	4,490	21.4%
Total	8,408	100.0%	12,535	100.0%	56	1	20,999	100.0%

## Conclusions

The concentration of affordable housing in low resource areas, both in the current affordable housing inventory and in the Sixth Cycle sites inventory, presents an opportunity for positive transformation in these neighborhoods. 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. The City's inclusion of place-based, community health, and environmental equity strategies in its Housing and Action Plans underscores a commitment to improving these areas while safeguarding residents from displacement. Moving forward, sustained implementation of these strategies will be crucial in fostering inclusive growth and enhancing quality of life across these communities.

### 5.3 Community Participation Process and Policies

Adequate community involvement and representation are important to overcoming and identifying impediments to fair housing or other factors that may restrict access to housing. Decisions regarding housing development in a community are typically made by the City Council and Planning Commission. The Council members are elected officials and answer to the constituents. Planning Commissioners serve an advisory role to the elected officials. The City's Planning Commission consists of nine members. In addition to the City Council and Planning Commission, most jurisdictions have appointed commissions, committees, and boards to address specific issues. For example, the City of Riverside has a Commission of the Deaf, Budget Engagement Commission, Commission on Disabilities, Commission on Aging, and the Humans Relations Commission.

**Commission of the Deaf.** Members act in an advisory capacity on facilitating the removal of barriers toward integration and participation of persons of the deaf community into all economic, political and community living areas.

**Budget Engagement Commission.** Advise on spending and policy priorities based on information received through quarterly financial and performance reports including revenues from transaction and use tax, work with City staff to maximize public engagement on municipal budgetary issues, and provide input on performance measures and reporting programs.

**Commission on Disabilities.** Advise the City Council on all matters affecting persons with disabilities in the community; review community policies, programs, and actions that affect persons with disabilities; and help create a public awareness of the needs in areas such as housing, employment, and transportation.

**Commission on Aging.** Study the local senior issues to learn about current programs, define future needs, and reference Best Practices to make recommendations to the Mayor and City Council on how to maintain and improve its status as a Senior-Friendly Community.

**Human Relations Commission.** Advise on issues of discrimination and advocate for equal opportunity, justice, and access to services and opportunities. The Commission engages in activities designed to aid in the elimination of prejudice, intolerance, and discrimination against individuals or groups because of race, color, religion, national origin, language, citizenship status, sex, sexual orientation, gender identity, gender expression, or cultural background. The Commission empowers communities and institutions by promoting an informed and inclusive multicultural society.

Community participation can be limited or enhanced by actions or inaction by a public agency. A broader range of residents may feel more comfortable approaching an agency with concerns or suggestions if that agency offers sensitivity or diversity training to its staff members that typically interface with the public. In addition, if there is a mismatch between the linguistic capabilities of staff members and the native languages of local residents, non-English speaking residents may be unintentionally excluded from the decision-making process. Another factor that may affect community participation is the inadequacy of an agency or public facility to accommodate residents with various disabilities.

Finally, the City's public facilities are accessible; however, not all facilities are fully compliant with every requirement under the Americans with Disabilities Act (ADA). The City makes every effort to reasonably accommodate persons with disabilities at public meetings and to ensure equal access to any public facility, program, service, or function.

On December 2023, the City Council adopted a Citywide Community Engagement Policy.<sup>12</sup> that provides a comprehensive policy for engagement and formalizes expectations for community outreach efforts for projects of all types. The City will continue to prioritize implementation of the Citywide Community Engagement Policy for all land use proposals, both City-initiated and applicant-driven. Opportunities to refine and expand engagement efforts for housing development projects will be examined as opportunities to revisit the Policy arise.

The City's outreach efforts demonstrate a multi-faceted approach to engaging the community, focusing on inclusivity, accessibility, and responsiveness to diverse needs. Key aspects of the City's outreach are as follows:

#### *Multi-Channel Communication and Accessibility*

The City advertises meetings and events using a combination of the City website, social media, mailers, local newspapers, and the Riverside Chamber of Commerce calendar. This variety of communication channels, supplemented by city-wide mailer distribution, maximizes accessibility across demographic groups, including those without digital access.

Meetings are offered in English, Spanish, and American Sign Language (ASL), and other language accommodations are provided upon request. This proactive approach accommodates Riverside's linguistic diversity, ensuring that residents with limited English proficiency can participate meaningfully.

Meetings and events are held in ADA-compliant locations, and ASL interpreters and other language accommodations are available upon request. Additionally, accessibility accommodations are actively promoted in outreach materials, ensuring residents are fully informed and encouraged to participate.

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<sup>12</sup> Citywide Community Engagement Toolkit, <https://riversideca.legistar.com/View.ashx?M=F&ID=12350609&GUID=B23EC379-48C4-4A6B-929A-8BF4A5E8324A>

All information about housing opportunities and resources is available in English and Spanish, with additional languages available upon request.

#### *Targeted Outreach and Inclusivity*

The City uses city-wide mailer distribution and targeted social media outreach using filters to reach various demographics to reach marginalized communities.

Meetings held in each city ward further ensure accessibility for residents in hard-to-reach neighborhoods, supporting equitable engagement across the City.

#### *Feedback Mechanisms and Ongoing Evaluation*

Feedback from community meetings is recorded and followed up with, ensuring community voices are valued and incorporated into decision-making. Contact information on mailers and social media allows the City to gather input from residents unable to attend, expanding the reach of community input.

Regular evaluations through the Annual Action Plan and a five-year city-wide survey provide data on outreach effectiveness, allowing the City to adjust strategies in alignment with fair housing goals, thus fostering continuous improvement.

### Conclusions and Recommendations

The presence of elected officials, advisory commissions, and inclusive policies demonstrates a commitment to diversity and representation in decision-making processes. Continued monitoring of outreach effectiveness through feedback and periodic evaluations will help the City make ongoing improvements, aligning efforts with fair housing goals.

## 6. Private Sector Fair Housing Impediments Analysis

Private sector impediments to fair housing, prohibited by the 1968 Federal Fair Housing Act (FFHA) and its amendments, as well as the California Fair Employment and Housing Act (FEHA), include various forms of discriminatory practices and barriers that limit equal access to housing opportunities based on protected characteristics. This AI presents an analysis of nine potential private sector impediments to fair housing choice.

### 6.1 Housing Discrimination

Sections 804 (a), (b), and (d) of the 1968 Fair Housing Act, as amended, describe several prohibited housing discriminatory practices such as the following:

- (a) To refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin.
- (b) To discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, religion, sex, familial status, or national origin.
- (d) To represent to any person because of race, color, religion, sex, handicap, familial status, or national origin that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available.

The California Fair Employment and Housing Act (FEHA) prohibits unlawful practices similar to those that are described in the 1968 Federal Fair Housing Act, as amended. The State law expands the description of prohibited practices to “harassment,” and to “harass, evict, or otherwise discriminate” for the purpose of “retaliation” against a protected class. Moreover, the State law expands the protected classes to include, among others, sexual orientation, marital status, ancestry, age, and source of income.

Housing discrimination complaints can be filed directly with the U.S. Department of Housing and Urban Development (HUD). In California the housing discrimination complaints are processed by HUD’s Office of Fair Housing and Equal Opportunity (FHEO). Riverside residents may also file complaints with the State Civil Rights Department (formerly Department of Fair Employment and Housing, DFEH), and the Fair Housing Council of Riverside County, Inc. (FHCRC).

#### 1. Fair Housing Council of Riverside County (FHCRC)

FHCRC is a non-profit organization that has the capacity to provide fair housing information, outreach, 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 that 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.

Housing discrimination complaint data was compiled by the FHCRC for the period from FY 2019-2020 through FY 2023-2024. During this 5-year period, 292 housing discrimination complaints were made with the FHCRC by Riverside residents. **Table 47** shows that disability was the most frequently cited basis for complaints (46 percent overall, with 34 percent for physical disability and 12 percent for mental disability). One reason for this is that discrimination against individuals with disabilities is often more visible, usually appearing as an explicit rejection of requests for reasonable accommodations or modifications to housing units. Race, source of income, national origin, and religion also ranked among the top five bases for discrimination complaints.

Table 47: Housing Discrimination Complaints by Protected Class, FY 2019/2020 to FY 2023/2024		
Protected Class	Number of Complaints	Percentage Distribution
Physical Disability	97	34.0%
Race	38	13.3%
Mental Disability	34	11.9%
Source of Income	23	8.1%
National Origin	19	6.7%
Religion	18	6.3%
Familial Status	16	5.6%
Sex	15	5.3%
Age	11	3.9%
Sexual Orientation	7	2.5%
Arbitrary	4	1.4%
Gender	2	0.7%
Ancestry	1	0.4%
Total	285	100.0%
Source: Housing discrimination complaint records of the Fair Housing Council of Riverside County, Inc.		
Note: This table reflects the total instances a protected class was cited as the basis for a complaint, not the total number of complaints.		

FHCRC provided demographic information for residents filing discrimination complaints. Among the 292 complainants for whom race/ethnicity data was available, approximately 40 percent were White, 36 percent were Black/African American, and 14 percent were Hispanic. Black residents are disproportionately affected by discrimination, comprising 5 percent of the city's population but representing over one-third of the discrimination complainants. White residents are also overrepresented, though to a lesser extent.

Table 48: Housing Discrimination Complaints by Race/Ethnicity, FY 2019/2020 to FY 2023/2024			
Race/Ethnicity	Number of Complaints	Percentage Distribution	% Population
White	119	39.5%	27.3%
Black/African American	106	35.2%	5.4%
Hispanic	41	13.6%	55.4%
More than one race	16	5.3%	3.0%
Asian	7	2.3%	8.2%
Unknown/Other (Other Multi-Race/Non-Hispanic)	2	0.7%	N/A
Chose not to respond	1	0.3%	N/A
Total	292	100.00%	N/A

Source: Housing discrimination complaint records of the Fair Housing Council of Riverside County, Inc.  
Note: In FY 2022, FHCRC's quarterly reports changed their approach to reporting race and ethnicity. Before FY 2022, they offered 21 combined race/ethnicity options (e.g., Black/African American & Hispanic, Hispanic Black & White, Black non-Hispanic). After FY 2022, they began reporting race and ethnicity separately. The race categories now include American Indian/Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. Ethnicity is reported separately as Hispanic and non-Hispanic. For calculations, the detailed race categories from prior to FY 2022 were grouped as follows: "White" includes White Non-Hispanic and White, "Black/African American" includes "Black/African American and Black Non-Hispanic, and "Hispanic" includes Hispanic, Hispanic Black, Hispanic Black & White, Black/AA & Hispanic.

FHCRC also reports on the number of complaints made by special needs populations (seniors, female-headed households, and persons with disabilities). About 61 percent of complainants belonged to a special needs population. Of these 179 complainants, 127 were persons with disabilities, 29 were female head of households, and 23 were seniors. This aligns with the fact that disability was the most common basis for discrimination complaints.

Actions/resolutions for 142 of the complaints were reported between FY 2019 and FY 2023. About 72 percent of complaints were counseled, while 25 percent were resolved through education. Only 3 percent (four complaints) were sent to the State Civil Rights Department or to HUD.

Table 49: Housing Discrimination Complaints by Protected Class, FY 2019/2020 to FY 2023/2024		
Action	Number of Complaints	Percentage Distribution
Education	36	25.4%
Counseled	102	71.8%
Civil Rights Department/HUD	4	2.8%
Attorney	0	0.0%
Mediated	0	0.0%
Closed	0	0.0%
Total	142	100.0%

Source: Housing discrimination complaint records of the Fair Housing Council of Riverside County, Inc.

## 2. Civil Rights Department (CRD)

The mission of the California Civil Rights Department (CRD) is to protect Californians from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, CRD keeps track of and investigates complaints of housing



discrimination, as well as complaints in the areas of employment, housing, public accommodations, and hate violence.

Between FY 2020 and FY 2024, 33 cases in Riverside were filed with CRD through the California Civil Rights System (CCRS) (<https://ccrs.caleivilrights.ca.gov/s/>). The most frequent basis of complaints were disability and race (**Table 50**). Most complaints involved denial of equal terms and denial of rental/sale/lease (**Table 51**).

Table 50: Basis for Discrimination Complaints Filed with CRD, FY 2020/2021 to FY 2023/2024		
Action	Number of Complaints	Percentage Distribution
Disability	14	42.4%
Race	11	33.3%
Source	8	24.2%
Color	7	21.2%
Ancestry	5	15.2%
Nat Origin	5	15.2%
Other	5	15.2%
Marital Status	4	12.1%
Sex/Gender	4	12.1%
Fam Status	2	6.1%
Sex Harass	2	6.1%
Religion	1	3.0%
Genetic Info	1	3.0%
Sex Orientation	1	3.0%
Military Status	1	3.0%
Total	71	–
Source: California Civil Rights Department (CRD), August 2024.		
Note: This table reflects the total instances a protected class was cited as the basis for a complaint, not the total number of complaints. Some complaints cited multiple basis for discrimination.		

Table 51: Acts of Discrimination for Complaints Filed with CRD, FY 2020/2021 to FY 2023/2024		
Action	Number of Complaints	Percentage Distribution
Denied equal terms	20	60.6%
Denied rental/sale/lease	17	51.5%
Denied reasonable accommodation for a disability	11	33.3%
Subject to discriminatory statements/advertising	11	33.3%
Evicted	5	15.2%
Other	5	15.2%
Subject to restrictive rule/covenant	5	15.2%
Denied reasonable accommodation for religious creed	1	3.0%
Subject to discriminatory zoning/land use	1	3.0%
Total	76	–
Source: California Civil Rights Department (CRD), August 2024.		
Note: This table reflects the acts of discrimination cited in complaints, not the total number of complaints. Some complaints cited multiple acts.		

Investigations at CRD begin with the intake of a complaint. Complainants are first interviewed to collect facts about possible discrimination. Interviews are normally conducted by

telephone. If the complaint is accepted for investigation, the CRD drafts a formal complaint that is signed by the complainant and served. If jurisdictional under federal law, the complaint is also filed with the United States Department of Housing and Urban Development (HUD). As a substantially equivalent agency, CRD's findings are usually accepted by HUD. The recipient of the complaint (usually a landlord, seller, property manager, seller, or agent) is required to answer and has the opportunity to negotiate resolution with the complainant. If the case is not resolved voluntarily, the CRD conducts a formal investigation.

If the investigative findings do not show a violation of the law, CRD will close the case. If investigative findings show a violation of law, the CRD schedules a formal conciliation conference. During the conciliation conference, the CRD presents information supporting its belief that there has been a violation and explores options to resolve the complaint. If formal conciliation fails, the CRD Housing Administrator may recommend litigation. If litigation is required, the case may be heard before the Fair Employment and Housing Commission (FEHC) or in civil court. Potential remedies for cases settled by the FEHC include out-of-pocket losses, injunctive relief, access to the housing previously denied, additional damages for emotional distress, and civil penalties up to \$10,000 for the first violation. Court remedies are identical to FEHC remedies with one exception; instead of civil penalties, a court may award unlimited punitive damages.

Of the 33 complaints filed with the CRD, 70 percent were closed due to no cause determination, 18 percent were settled through voluntary mediation, and 6 percent were successfully conciliated or settled (Table 52).

Table 52: Close Reason for Complaints Filed with CRD, FY 2020/2021 to FY 2023/2024		
Action	Number of Complaints	Percentage Distribution
No Cause Determination	23	69.7%
Settled by CRD: Voluntary Mediation	6	18.2%
Conciliation/Settlement Successful	2	6.1%
Dismissed for Lack of Jurisdiction	1	3.0%
Complaint Withdrawn	1	3.0%
Total	33	100.0%
Source: California Civil Rights Department (CRD), August 2024.		

3. U.S. Department of Housing and Urban Development (HUD)

The U.S. Department of Housing and Urban Development (HUD) maintains a record of all housing discrimination complaints for jurisdictions, including the City of Riverside. According to the HUD website, any person who believes their housing rights have been violated may submit a complaint to HUD via phone, mail or the Internet. These grievances can be filed on the basis of race, color, national origin, sex, disability, religion, familial status and retaliation. HUD refers complaints to the California Civil Rights Department (CRD), which has 30 days to address the complaint. As a substantially equivalent agency, CRD’s findings are usually accepted by HUD. Thereafter, HUD tracks the complaint and its issues and outcomes as a “dually filed” complaint.

Between January 2019 and June 2024, 39 fair housing cases were recorded by HUD in Riverside. Each case may allege multiple bases of discrimination. Cases involving

discrimination based on disability and race were the most common although incidences concerning retaliation, color, national origin, and sex were also reported. Most (33) of the 39 cases have been closed, according to HUD. Among these 33 closed cases, 21 cases were determined that no violations occurred; one case was withdrawn by the complainant after resolution; 10 cases were successfully settled/conciliated; and one case was closed because the complainant failed to cooperate.

Table 53: Basis for Discrimination of Cases filed with HUD (2019-2024)								
	2019	2020	2021	2022	2023	2024	Total*	% of Basis
Total Cases	3	3	7	10	12	4	39	
Basis for Discrimination								
Color	1		1		1		4	8.3%
Disability	2	2	3	7	3		18	37.5%
Familial Status		1	1				4	8.3%
National Origin		1		1	1		3	6.3%
Race	1		2	1	2	2	11	22.9%
Religion		1					1	2.1%
Retaliation			1	2	1		4	8.3%
Sex				1	2		3	6.3%
Total	4	5	8	12	15	4	48	100.0%
Source: Department of Housing and Urban Development (HUD), June 2024.								
*A total of 39 cases were filed, but because some cases alleged discrimination on multiple grounds, the total in this row indicates how often the protected class was cited as a basis for discrimination.								

### Conclusions and Recommendations

To address housing discrimination effectively, the city can take a variety of proactive steps. This includes fostering ongoing partnerships with a fair housing provider (FHCRC) to conduct community-wide outreach and educational initiatives aimed at increasing awareness of fair housing laws and rights among residents. Maintaining these partnerships will ensure the availability of fair housing services, such as processing discrimination complaints and offering counseling to landlords and tenants. Additionally, the city can implement and enforce policies that promote inclusivity in housing design and accommodations for individuals with disabilities, ensuring all properties meet accessibility standards. Moreover, providing comprehensive training programs for landlords, property managers, and real estate professionals on fair housing laws, reasonable accommodations, and cultural sensitivity will further support the city's commitment to fostering fair and equitable housing opportunities for all residents. These actions collectively aim to create a more inclusive and accessible housing environment within the community.

## 6.2 Brokerage Services

### 1. National Association of REALTORS® (NAR)

The National Association of REALTORS® (NAR) has developed a Fair Housing Program to provide resources and guidance to REALTORS® in ensuring equal professional services for all people. The term REALTOR® identifies a licensed professional in real estate who is a member of the NAR; however, not all licensed real estate brokers and salespersons are members of the NAR.

In January 2020, NAR leadership passed the Fair Housing Action Plan, abbreviated ACT!, emphasizing Accountability, Culture Change, and Training to advance fair housing in the industry. NAR provides resources to its members, brokerages, and associations to implement ACT! locally.

#### *Code of Ethics*

Article 10 of the NAR Code of Ethics provides that “REALTORS® shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. REALTORS® shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity.”

Additionally, Standard of Practice Article 10-1 states that, “When involved in the sale or lease of a residence, REALTORS® shall not volunteer information regarding the racial, religious or ethnic composition of any neighborhood nor shall they engage in any activity which may result in panic selling, however, REALTORS® may provide other demographic information.” Standard of Practice 10-3 adds that “REALTORS® shall not print, display or circulate any statement or advertisement with respect to selling or renting of a property that indicates any preference, limitations or discrimination based on race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity.”

NAR requires all REALTORS® to take an Ethics course developed by NAR as an online course in addition to attending orientation, and every 3 years after joining. All newly instated REALTORS® have 60 days to attend orientation from their activation and 30 days from their activation to complete the Code of Ethics requirement (which is due every 3 years).

#### *Diversity Certification*

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

## 2. California Department of Real Estate (DRE)

The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons. As noted earlier, not all licensed brokers and salespersons are members of the National or California Association of REALTORS®.

The DRE has adopted education requirements that include courses in ethics and in fair housing. To renew a real estate license, each licensee is required to complete 45 hours of continuing education, including three hours in each of the four mandated areas: Agency, Ethics, Trust Fund, and Fair Housing. The fair housing course contains information that will enable an agent to identify and avoid discriminatory practices when providing real estate services to clients.

The law requires, as part of the 45 hours of continuing education, completion of five mandatory three-hour courses in Agency, Ethics, Trust Fund Handling and Fair Housing and Risk Management. These licensees will also be required to complete a minimum of 18 additional hours of courses related to consumer protection. The remaining hours required to fulfill the 45 hours of continuing education may be related to either consumer service or consumer protection, at the option of the licensee.

## 3. California Association of REALTORS® (CAR)

The California Association of REALTORS (CAR) is a trade association of realtors statewide. As members of organized real estate, realtors also subscribe to a strict code of ethics as noted above. CAR has Diversity and Inclusion Programs and multiple committees and forums (Diversity Committee, Fair Housing and Diversity Forum, Fair Housing Policy Committee, Global Real Estate Forum, and Young Professionals Network Forum) to foster diversity and inclusion within their organizations.

## 4. Inland Valleys Association of REALTORS®

Real estate professionals whose business is located in the City of Riverside most likely belong to the Inland Valleys Association of REALTORS (IVAR). IVAR has more than 6,000 members, and its headquarters are located on Elizabeth Street in the City of Riverside. According to the Association's LinkedIn page, "The Association's governing documents have been approved by the National Association of REALTORS®, and the Association is fully compliant with both national and state requirements. The Bylaws have recently been updated to include the most recent thinking of leadership at the national, state and local level." In addition, IVAR's Fair Housing Committee offers a platform for members to learn about housing discrimination and advocate for equal housing rights in the community. Like all associations, IVAR has a Multiple Listing Service (MLS). The California Regional Multiple Listing Service, Inc. has established rules and regulations. When entering a new listing on the MLS, according to these rules and regulations, the "property description" field may only contain a description of the property, its features, its location or community, specific terms to or exclusions from a sale (or lease), or legally required statements. Among the items not allowed to appear in the property description is any language that violates Fair Housing/HUD Guidelines. Further, Section VI Public Remarks Sub Part C9 "What is Not Allowed", of the CRMLS Rules and Regulations

Reference Guide states the following: “Language that violates applicable fair housing laws and guidelines.”

## Conclusions and Recommendations

Given the efforts outlined by organizations like the NAR, the DRE, and local associations such as IVAR, real estate professionals have robust tools to combat housing discrimination. To further advance fair housing goals with limited resources, focusing on ongoing education, community partnerships, and effective complaint monitoring remains crucial. These measures can strengthen fair housing practices without requiring substantial financial investments, promoting equity and inclusivity in housing markets.

### 6.3 Steering

Steering is a practice in real estate where agents guide prospective home buyers towards or away from certain neighborhoods based on race, ethnicity, religion, or other discriminatory factors. This is illegal under the Fair Housing Act, as it perpetuates segregation and limits housing opportunities for certain groups. Steering can affect the diversity and inclusivity of communities, leading to unequal access to resources and services.

Examples of prohibited steering practices include:

- A realtor deliberately guiding potential purchasers toward or away from certain neighborhoods because of membership in a protected class.
- A lender who deliberately guides loan applicants toward or away from certain types of loans because of membership in a protected class.
- Limiting a renter's housing choices by guiding or encouraging the person to look elsewhere, based on a fair housing protected characteristic. This type of steering mostly affects apartment seekers as opposed to in-place tenants.

The steering of home buyers probably happens less frequently than in the past because the internet enables home buyers to be more active in the search process and less reliant on realtors. According to the NAR 2023 Profile of Home Buyers and Sellers,<sup>13</sup> all homebuyers used the internet to search for a home, with 41 percent starting by looking at properties online and only 20 percent initially contacting a real estate agent.

## Conclusions and Recommendations

Steering may adversely impact homebuyers in their search process and when they apply for a loan. Steering also may adversely impact in-place renters and rental apartment seekers. Corrective actions may be taken by the Federal and State governments regarding loan steering so that abuse does happen in the future as frequently as it occurred in the early to mid-2000s. However, the steering of apartment seekers is likely to continue, although it is not possible to

<sup>13</sup> [https://cdn.nar.realtor/sites/default/files/documents/2023-profile-of-home-buyers-and-sellers-highlights-11-13-2023.pdf?\\_gl=1\\*1gic4u7\\*\\_gcl\\_au\\*Mji0NDYyOTg3LjE3MTg2NTc2NDI](https://cdn.nar.realtor/sites/default/files/documents/2023-profile-of-home-buyers-and-sellers-highlights-11-13-2023.pdf?_gl=1*1gic4u7*_gcl_au*Mji0NDYyOTg3LjE3MTg2NTc2NDI).

measure its frequency. Although steering cannot be precisely quantified, there is evidence that it exists and, therefore, it does create an impediment to fair housing choice.

## 6.4 Appraisal Practices

The 1968 Federal Fair Housing Act, as amended, makes it unlawful to discriminate against a protected class in appraising property. An appraisal is a written assessment of market value and is used by mortgage underwriters to determine whether there is sufficient collateral to lend money to a homebuyer. Unlawful discriminatory appraisal practices, for example, may include:

- Taking into account the race and ethnic make-up of a neighborhood
- Taking into the account the race and ethnicity of the seller and/or buyer

Homebuyers requiring a loan to buy a home are given the opportunity to review an appraisal report. The Uniform Residential Appraisal Report is a six-page form used by appraisers to determine the value of a home. In bold letters, the form states:

“Note: Race and the racial composition of the neighborhood are not appraisal factors.”

At the end of the report, there are “appraiser’s certifications,” which include certification #17:

“I did not base, either partially or completely, my analysis and/or opinion of market value in this appraisal report on the race, color, religion, sex, age, marital status, handicap, familial status, or national origin of either the prospective owners or occupants of the subject property or of the present owners or occupants of the properties in the vicinity of the subject property or on any other basis prohibited by law.”

Under both federal law (the Equal Credit Opportunity Act of 1976 and its implementing regulations) and California law (Business & Professions Code §11423), a lender is generally obligated to inform a credit applicant of the right to receive a copy of the appraisal used in connection with an application, and to honor the applicant's written request for a copy of the appraisal report.

The California Association of REALTORS (CAR) explains that one of the reasons a buyer should obtain an appraisal is “to make sure the lender has not engaged in any discriminatory practices.”

Consequently, a homebuyer/borrower is entitled to a copy of the appraisal. But a homebuyer and borrower during the purchase process has a bewildering array of documents to review and sign. Additionally, given an appraisal to review, they may not have the knowledge to review an appraisal report to determine if, for example, race or ethnicity were considered in making the appraisal.

## Conclusions and Recommendations

Complaints regarding discriminatory appraisal practices are not routinely collected by local, State or Federal agencies. Data are unavailable to demonstrate if discriminatory appraisal practices adversely impact some of Riverside real estate transactions.

### 6.5 Unfair Lending Practices

Equal access to credit so that borrowers can purchase a home is a fundamental goal of fair housing. Section 805 of the 1968 Federal Fair Housing Act, as amended, and the Equal Credit Opportunity Act of 1976 prohibit the denial of access to credit because of a loan applicant's race, color, religion, sex, handicap, familial status, or national origin. This section reviews the lending practices of financial institutions and the access to financing for all households, particularly minority households and those with lower incomes. Lending patterns in lower and moderate-income neighborhoods and areas of minority concentration are also examined. However, publicly available data on lending does not contain detailed information to make conclusive statements of discrimination, but can only point out potential areas of concerns. Furthermore, except for outreach and education efforts, a local jurisdiction's ability to influence lending practices is limited. Such practices are largely governed by national policies and regulations. Key pieces of legislation are summarized below, although additional protections have been provided during the "great depression" and implosions of the housing market.

#### 1. Legislative Protection

The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending.

##### *Community Reinvestment Act and Home Mortgage Disclosure Act*

The CRA is intended to encourage regulated financial institutions to help meet the credit needs of their entire communities, including lower- and moderate-income neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance. However, the CRA rating is an overall rating for an institution and does not provide insights regarding the lending performance at specific locations by the institution.

##### *Home Mortgage Disclosure Act*

In tandem with the CRA, the HMDA requires lending institutions to make annual public disclosures of their home mortgage lending activity. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants. HMDA data provide some insight into the lending patterns that exist in a community. However, HMDA data are only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices due to the lack of detailed information on loan terms or specific reasons for denial.



### Conventional versus Government-Backed Financing

Conventional financing involves market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions. To assist lower- and moderate-income households that may have difficulty in obtaining home mortgage financing in the private market, due to income and equity issues, several government agencies offer loan products that have below market rate interests and are insured (“backed”) by the agencies. Sources of government-backed financing include loans insured by the Federal Housing Administration (FHA), the Department of Veterans Affairs (VA), and the Rural Housing Services/Farm Service Agency (RHA/FSA). Often, government-backed loans are offered to the consumers through private lending institutions. Local programs such as first-time homebuyer and rehabilitation programs are not subject to HMDA reporting requirements.

## 2. Lending Patterns

The availability of financing affects a person’s ability to purchase or improve a home. Under the Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications by the income, gender, and race of the applicants. This applies to all loan applications for home purchases, improvements and refinancing. HMDA data are submitted by lending institutions to the FFIEC. Certain data is available to the public via the FFIEC site either in raw data format or as pre-set printed reports.

The 2021 HMDA data reported a total of 27,988 loan applications to purchase homes located in the City of Riverside (**Table 54**), of which 75 percent were refinance loans.

Table 54: Disposition of Home Loans								
Loan Type	Total Applications		Approved		Denied		All Others	
	#	%	#	%	#	%	#	%
Conventional Purchase	4,959	18%	3517	71%	511	10%	931	10%
Gov’t-Backed Purchase	1,186	4%	882	74%	92	8%	212	8%
Home Improvement	957	3%	443	46%	341	36%	173	36%
Refinance	20,886	75%	13,762	66%	2,287	11%	4,837	11%
All	27,988	100%	18,604	66%	3,231	12%	6,153	12%

Source: FFIEC Home Mortgage Disclosure Act One Year National Loan Level Dataset, 2021.

### Home Purchase Loans

In 2021, a total of 4,959 households applied for conventional loans to purchase homes in the City. The approval rate in 2021 for conventional home purchase loans was approximately 71 percent, while 10 percent of applications were denied.

Potential homeowners can also choose to apply for government-backed home purchase loans when buying their homes. In a conventional loan, the lender takes on the risk of losing money in the event a borrower defaults on a mortgage. For government-backed loans, the loan is insured, either completely or partially, by the government. The government does not provide the loan itself, but instead promises to repay some or all of the money in the event borrower defaults. This reduces the risk for the lender when making a loan.

Government-backed loans generally have more lenient credit score requirements, lower down payment requirements, and are available to those with recent bankruptcies. However, these loans may carry higher interest rates and most require homebuyers to purchase mortgage insurance. Furthermore, government-backed loans have strict limits on the amount a homebuyer can borrow for the purchase of a home. **Table 54** shows that 1,186 households applied for government-backed loans in 2021 (4 percent of loan applications that year). Approval rates for these loans were higher and denial rates were lower than for conventional home purchase loans in 2021. Of the government-backed loan applications, approximately 74 percent were approved, and eight percent were denied in 2021.

#### *Home Improvement Loans*

Reinvestment in the form of home improvement is critical to maintaining the supply of safe and adequate housing. Historically, home improvement loan applications have a higher rate of denial when compared to home purchase loans. Part of the reason is that an applicant's debt-to-income ratio may exceed underwriting guidelines when the first mortgage is considered with consumer credit balances. Another reason is that many lenders use the home improvement category to report both second mortgages and equity-based lines of credit, even if the applicant's intent is to do something other than improve the home (e.g., pay for a wedding or college). Loans that will not be used to improve the home are viewed less favorably, since the owner is divesting in the property by withdrawing accumulated wealth. From a lender's point of view, the reduction in owner equity represents a higher risk. In 2021, 957 applications for home improvement loans were submitted by Riverside households. Of these applications, 46 percent were approved and 36 percent were denied.

#### *Refinancing*

Homebuyers refinance existing home loans for a number of reasons. Refinancing can allow homebuyers to take advantage of better interest rates, consolidate multiple debts into one loan, reduce monthly payments, alter risk (i.e. by switching from variable rate to fixed rate loans), or free up cash and capital.

Approximately 75 percent of loan applications submitted by Riverside households in 2021 were for home refinancing (20,886 out of 27,988 applications). About 66 percent of these applications were approved and 11 percent were denied. However, due to the high interest rates in recent years, the overall refinancing activities are expected to have been lowered.

#### *Lending Patterns by Race/Ethnicity and Income Level*

The federal Fair Housing Act prohibits discrimination in mortgage lending based on race, color, national origin, religion, sex, familial status, or handicap (disability). It is, therefore, important to look not just at overall approval and denial rates for a jurisdiction, but also whether these rates vary by other factors, such as race/ethnicity. Unfortunately, other characteristics (such as disability) are not monitored and therefore no data is available for analysis.

In an ideal situation, the applicant pool for mortgage lending should reflect the demographics of a community. When one racial/ethnic group is overrepresented or underrepresented in the total applicant pool, it could be an indicator of access to opportunities. Such a finding may be

a sign that access to mortgage lending is not equal for all individuals. As shown in **Table 55**, White applicants were noticeably overrepresented in the loan applicant pool during 2021, while Hispanics were significantly underrepresented.

Table 55: Demographics of Loan Applicants vs. Total Population (2017)			
	Percent of Applicant Pool	Percent of Total Population	Variation
White	56%	31%	+25%
Black	4%	6%	-1%
Hispanic	7%	53%	-46%
Asian	9%	7%	+2%
Note: Percent of total population estimates are based on 2021 applicant data and compared to total population estimates from the 2017-2021 American Community Survey.			
Source: American Community Survey, 2017-2021; FFIEC Home Mortgage Disclosure Act One Year National Loan Level Dataset, 2021.			

In addition to looking at whether access to lending is equal, it is important to analyze lending outcomes for any signs of potential discrimination by race/ethnicity. Approval rates for loans tend to increase as household income increases; however, lending outcomes should not vary significantly by race/ethnicity among applicants of the same income level. **Table 56** summarizes lending outcomes by race/ethnicity and income.

Loan approval rates in Riverside demonstrate a clear correlation between income levels and access to financing across various racial and ethnic groups. The data indicates that White applicants exhibit the highest approval rates at each income tier, particularly in the upper-income bracket, where 72 percent of applications are approved. In contrast, Black and Hispanic applicants consistently show lower approval rates, especially at lower income levels. For instance, only 48 percent of Black applicants in the low-income category and 39 percent of Hispanic applicants received approval compared to 53 percent of low income White applicants.

The lower number of applications from Black and Hispanic individuals at low income levels may suggest potential barriers, such as limited credit access and insufficient financial education, which could impede their ability to apply for loans. Additionally, the data reveals that even at higher income levels, Black and Hispanic applicants face challenges, with only 61 percent of Black applicants and 60 percent of Hispanic applicants in the upper-income category receiving loan approvals, compared to 72 percent of White applicants and 68 percent of Asian applicants.

Overall, these findings highlight systemic issues within the lending process, where biases may disproportionately affect the ability of Black and Hispanic applicants to secure financing compared to their White and Asian counterparts.

**Table 56: Lending Patterns by Race/Ethnicity (2021)**

	Applications		Approved		Denied		Withdrawn/ Incomplete	
	#	%	#	2021	#	2021	#	2021
<b>White</b>								
Low (0-49% AMI)	925	6%	490	53%	250	27%	185	20%
Moderate (50-79% AMI)	1913	13%	1,217	64%	292	15%	404	21%
Middle (80-119% AMI)	3869	26%	2,774	72%	351	9%	744	19%
Upper (≥120% AMI)	8,066	55%	5,801	72%	720	9%	1,545	19%
Total	1,4773	100%	10,282	70%	1,613	11%	2,878	19%
<b>Black</b>								
Low (0-49% AMI)	83	7%	40	48%	24	29%	19	23%
Moderate (50-79% AMI)	106	9%	57	54%	24	23%	25	24%
Middle (80-119% AMI)	253	22%	140	55%	39	15%	74	29%
Upper (≥120% AMI)	686	61%	416	61%	97	14%	173	25%
Total	1,128	100%	653	58%	184	16%	291	26%
<b>Hispanic</b>								
Low (0-49% AMI)	123	6%	48	39%	53	43%	22	18%
Moderate (50-79% AMI)	271	14%	144	53%	52	19%	75	28%
Middle (80-119% AMI)	591	31%	335	57%	100	17%	156	26%
Upper (≥120% AMI)	922	48%	550	60%	126	14%	246	27%
Total	1,907	100%	1077	56%	331	17%	499	26%
<b>Asian</b>								
Low (0-49% AMI)	129	5%	60	47%	39	30%	30	23%
Moderate (50-79% AMI)	179	8%	105	59%	31	17%	43	24%
Middle (80-119% AMI)	423	18%	271	64%	51	12%	101	24%
Upper (≥120% AMI)	1,641	69%	1119	68%	203	12%	319	19%
Total	2,372	100%	1555	66%	324	14%	493	21%
<b>All</b>								
Low (0-49% AMI)	1,580	6%	754	48%	471	30%	355	22%
Moderate (50-79% AMI)	3,113	12%	1,868	60%	512	16%	733	24%
Middle (80-119% AMI)	6,620	25%	4,446	67%	718	11%	1,456	22%
Upper (≥120% AMI)	15,229	57%	10,479	69%	1,560	10%	3,190	21%
Total	26,542	100%	17,547	66%	3,261	12%	5,734	22%

Source: FFIEC Home Mortgage Disclosure Act One Year National Loan Level Dataset, 2021.

### *Lending Patterns by Census Tract Characteristics*

#### **Income Level**

To identify potential geographic differences in mortgage lending activities, an analysis of the HMDA data was conducted by census tract. Based on the Census, HMDA defines the following income levels.<sup>14</sup>

- Low-Income Tract – Tract Median Income less than or equal to 49 percent AMI
- Moderate-Income Tract – Tract Median Income between 50 and 79 percent AMI
- Middle-Income Tract – Tract Median Income between 80 and 119 percent AMI
- Upper-Income Tract – Tract Median Income equal to or greater than 120 percent AMI

<sup>14</sup> These income definitions are different from those used by HUD to determine Low and Moderate Income Areas.

**Table 57** summarizes the loan approval and denial rates of census tracts by income level in 2021. In 2021, there were 25 applicants from census tracts categorized as low-income by HMDA. Close to half of loan applications were submitted by residents from the City's upper income tracts. In general, home loan approval rates were the same as the income level of the census tract increased, while denial rates were similar across all income levels except at low census tract income level, where denial rates were highest. Higher income households are more likely to qualify for and be approved for loans, so this trend is to be expected.

Table 57: Outcomes Based on Census Tract Income (2021)								
Tract Income Level	Total Applicants		Approved		Denied		Other	
	#	%	#	%	#	%	#	%
Low	25	0.1%	16	64%	5	20%	4	16%
Moderate	4056	14%	2,648	65%	487	12%	921	23%
Middle	10,458	37%	6,884	66%	1,259	12%	2,315	22%
Upper	13,449	48%	9,056	67%	1,480	11%	2,913	22%
Total	27,988	100%	18,604	66%	3,231	12%	6,153	22%

Source: FFIEC Home Mortgage Disclosure Act One Year National Loan Level Dataset, 2021.

## Minority Concentration

HMDA also provides the minority population percentage within each census tract. **Table 58** summarizes the home loan approval and denial rates of census tracts in the City by the proportion of minority residents in 2021. A census tract with more than 50 percent minority population is considered "substantially minority." In 2022, approximately 84 percent of loan applications originated from census tracts designated as substantially minority. Approval and denial rates were comparable, regardless of whether the tract was classified as substantially minority or not.

Table 58: Outcomes Based on Minority Population of Census Tract (2017 and 2021)								
Tract Income Level	Total Applicants		Approved		Denied		Other	
	#	%	#	%	#	%	#	%
2021								
Substantially Minority	23,610	84%	15,573	66%	2802	12%	5235	22%
Not Substantially Minority	4,378	16%	3,031	69%	429	10%	918	21%
Total	27,988	100%	18,604	66%	3231	12%	6153	22%

Source: FFIEC Home Mortgage Disclosure Act One Year National Loan Level Dataset, 2021.

## Conclusions and Recommendations

The analysis of loan approval rates by race in Riverside reveals distinct disparities, even when controlling for income levels, indicating that factors beyond income may be influencing lending outcomes for certain racial groups. While higher approval rates at higher income levels are anticipated, significant discrepancies appear across racial groups at similar income levels, particularly affecting Black and Hispanic applicants.

For instance, at low-income levels, Black and Hispanic applicants experienced markedly lower approval rates than their White counterparts. This gap persists at middle and upper

income levels, where White and Asian applicants consistently achieve higher approval rates than Black and Hispanic applicants with comparable incomes. Specifically, at upper-income levels, Black applicants received approvals for only 61 percent of their applications, and Hispanic applicants for 60 percent, compared to 72 percent for White applicants and 68 percent for Asian applicants, suggesting that race may be impacting loan approvals beyond income factors alone.

Geographically, there are additional disparities based on the income level of census tracts and their racial composition. Loan approval rates improve as the income level of a census tract increases, which is expected due to income qualifications. However, approval rates within "substantially minority" tracts are comparable to other tracts, suggesting that while race may impact individual approval rates, the location-based factor has a more complex relationship. Despite similar approval and denial rates in high-minority areas, applicants from these neighborhoods may face barriers linked to both racial and socioeconomic factors, such as lower financial education, limited credit access, or fewer community resources supporting home ownership.

The combination of these race and geographic findings indicates that while lending patterns align with income to some degree, there are broader systemic issues. Minority applicants, especially Black and Hispanic individuals, face both individual-level barriers in securing loans, even at higher income levels, and community-level barriers based on their tract locations. These patterns underscore the need for fair housing enforcement, financial education programs, and inclusive credit-building initiatives to address the intersection of race, income, and geography in access to home financing.

The City's First Time Homebuyer Program, administered by the Fair Housing Council of Riverside County (FHCRC), is actively addressing many of the issues identified in lending and geographic disparities in access to homeownership. This program empowers prospective homebuyers through comprehensive educational workshops and outreach initiatives, supporting especially those from low to moderate-income backgrounds and minority groups.

#### **First Time Homebuyer Program**

The First Time Home Buyer Program hosted by the FHCRC is designed to empower prospective homebuyers through comprehensive educational workshops and outreach initiatives. Throughout the past five years, the program has demonstrated a robust commitment to community engagement and educational support.

The program hosts workshops in diverse locations within Riverside County, spanning cities like Hemet, Corona, and various neighborhoods in Riverside such as Northside and Arlanza. These workshops are strategically chosen to ensure accessibility and inclusivity, aiming to reach individuals from all backgrounds and income levels. During the COVID-19 pandemic, the FHCRC adapted its workshops to online webinars to ensure continued access to crucial education and support for aspiring homeowners amid unprecedented challenges. Workshops are also held in Spanish. Over the past five years, at least 420 residents in FHCRC service area have attended First-Time Homebuyer Workshops. Of these, about 70 percent of program participants were low to moderate income, 38 percent were non-White minorities, and 63

percent were women. In 2022, FHCRC returned to the 8 hours HUD Certified workshop format at their location at Mission Heritage Plaza in the City of Riverside.

Key components of the workshops include educating participants on the home buying process, budgeting, mortgage loan processes, identifying predatory lending practices, understanding credit impacts, and navigating down payment assistance programs. By providing this knowledge, the FHCRC equips attendees with essential tools to make informed decisions and overcome barriers to homeownership. Moreover, the program actively addresses common concerns among first-time homebuyers, including scams targeting vulnerable individuals during the home purchasing process. By educating participants on recognizing and avoiding fraudulent practices, the FHCRC empowers them to protect their financial interests effectively.

Partnerships with entities like Bank of America, which in 2019 dedicated over 1 billion annually for the next five years towards First Time Homebuyer down payment assistant programs, further enhance the program's impact. This financial support makes homeownership more attainable for low to moderate-income individuals, contributing to economic stability and community development.

Down payment assistance programs are essential to first time homebuyers; unfortunately, not only first time buyers, but also lenders unaware down payment assistance. The California Housing Finance Agency (CalHFA) has access to a comprehensive selection of home buyer assistance programs, mostly geared toward first-time homebuyers with low or moderate incomes. However, most of these programs require attending a HUD certified homebuying counseling course. Many agencies charge a fee for this certification course. However, FHCRC's First Time Home Homebuying workshop is a no cost service.

## 6.6 Homeowners Insurance

An example of a housing policy or practice that may have a disparate impact on a protected class is the provision and pricing of homeowner's insurance. The final rule states that "HUD has long interpreted the Fair Housing Act to prohibit discriminatory practices in connection with homeowners insurance."

Without insurance, banks and other financial institutions lend less. For example, if a company excludes older homes from coverage, lower-income and minority households who can only afford to buy in older neighborhoods may be disproportionately affected. Another example includes private mortgage insurance (PMI). PMI obtained by applicants from Community Reinvestment Act (CRA) protected neighborhoods is known to reduce lender risk. Redlining of lower-income and minority neighborhoods can occur if otherwise qualified applicants are denied or encouraged to obtain PMI.

Homeowners insurance can be made unavailable due to the claims history of a property or of the buyer seeking coverage. CLUE (Comprehensive Loss Underwriting Exchange) report is a claims-information report generated by LexisNexis®, a consumer-reporting agency. The report generally contains up to seven years of personal-auto and personal-property claims history.

An insurer may request a CLUE report when an application is made for coverage or request is made for a quote. The company uses the applicant's claims history or the history of claims at a specific property to decide if it will offer coverage and the premium amount. Insurance company studies show a relationship between past and future claims.

When a home is sold in California, the seller is not obligated to provide the buyer with a CLUE report. According to the California Association of REALTORS (CAR), the standard residential purchase agreement:

"... simply requires the seller to disclose known material facts and defects including "known insurance claims within the past five years." In other words, if the seller had a fire in the kitchen 2 years ago and made an insurance claim, then the seller must disclose this fact to the buyer. *The C.A.R. purchase contract does not require purchase of a third-party report, such as C.L.U.E.* Sellers may make the disclosures of known insurance claims by using the C.A.R. Standard Form "Supplemental Statutory and Contractual Disclosures" (Form SSD), which allows a seller to disclose his or her awareness of insurance claims via a simple yes/no checkbox format." *[Emphasis added]*

A seller must disclose only known insurance claims; C.A.R. purchase agreements *do not require sellers* to discover unknown claims, *or to purchase reports or other third-party information to make this disclosure.* Although sellers may choose to provide and pay for a third-party report to provide this optional third-party information to buyers, *neither the law nor C.A.R.'s purchase agreement require that they do so.*" *[Emphasis added]*

CAR points out, however:

"Given the increased difficulty of obtaining affordable homeowners' insurance in recent years, buyers should obtain quotes as early as possible in the home buying process. In the process of obtaining insurance, the insurance agent or underwriter will most likely be checking the insurance database, as a matter of course, without charge. Buyers should seek insurance quotes during the inspection period so that there will be clear understanding of the cost of the insurance early in the transaction, and so that buyers will have an opportunity to evaluate this fact during the inspection period."

In recent years, major insurance companies have pulled out of the California housing market, particularly due to the high fire hazards. Homeowners in Very High Fire Hazard Severity Zones are faced with significantly higher insurance rates. Those homes, however, tend to locate near hillside areas and are at lower density neighborhoods.

## Conclusions and Recommendations

Data are unavailable that demonstrates if the availability and cost of homeowners insurance are impediments to fair housing choice. To affirmatively further fair housing the FHCRC will describe "CLUE Reports" as part of its discussion on homeowners insurance at the First-time Homebuyers workshops.



## 6.7 Property Management

The FHA covers most – but not all – housing. Some exemptions to coverage under the FHA include: (a) owner-occupied buildings with no more than four units (which is commonly known as the Mrs. Murphy exemption); (b) single family housing sold or rented without the use of a broker if the private individual owner does not own more than three such single family homes at one time; or (c) housing operated by organizations and private clubs that limit occupancy to members.

Under California law, the owners of apartment buildings with 16 or more housing units must provide for on-site property management. More specifically, California Law Civil Code Title 25, Section 42 requires a manager, janitor, housekeeper, or other responsible person to live on the premises and have charge of every apartment complex that has 16 or more apartments units on the property if the property owner does not live on the premises. Apartment properties between 4 and 15 units must have a notice placed in a conspicuous place stating the property owner's name and address or the name and address of the agent in charge of the apartment house if the owner does not reside upon the premises. The Civil Code does not require apartment managers to reside on properties that have 4 or less units.

### 1. Rental Housing Stock and Renter Householders

Property management policies and practices are of keen importance to Riverside residents. At least 24 percent of the rental housing stock is located in structures having 16 or more housing units.<sup>15</sup> However, it is possible that structures with fewer units – 4-plexes for example – are located on the same premises and, therefore, could have 16 or more apartments in the complex. It is noteworthy that 38 percent of the rental housing stock is comprised of single-family homes and would not have on-site property management.

The owners and managers of apartment buildings must comply with a variety of fair housing laws such as:

- Residential Occupancy Standards (ROS)
- Reasonable accommodations
- Reasonable physical modifications
- Service and companion animals
- Other property management discriminatory practices

#### *Residential Occupancy Standards (ROS)*

A residential occupancy standard is a rule limiting the number of persons who may legally occupy a given space. California has adopted the Uniform Housing Code as its governmental occupancy code for health and safety purposes. (Health & Safety Code §17922(a); Title 25, California Code of Regulations §32). Private owners also enforce occupancy standards usually in the form of the number of persons per bedroom or per apartment unit.

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<sup>15</sup> American Community Survey (ACS) provides units-in-structure breakdowns within specific intervals. The interval for 16 or more units is not available. Therefore, 24 percent represents 20 or more units.

Housing providers' concerns related to residential occupancy standards include concerns about harm to property, such as wear and tear, nuisance, overwhelmed building systems, increased management costs, and potential liability. Other tenants and neighbors may share some of those concerns, as well. The residential occupancy standard issue was complicated by the 1988 Fair Housing Act amendments that added familial status as a protected characteristic. These amendments allowed tenants to argue that a private residential occupancy standard that is more restrictive than the relevant government residential occupancy standard discriminates on the basis of familial status. Enforcement of a residential occupancy standard may harm tenants by forcing them to reconfigure their desired household configuration, to purchase more housing, to change location, or to accept lower-quality housing. These possibilities also entail additional search time and costs. Tenants may also suffer discrimination. The most often harmed group is families with children, particularly larger families, nontraditional families, and blended families, which are statistically more likely to consist of people of color.

The CRD's current intake standard for acceptance of familial status complaints related to residential occupancy standards was articulated in a January 31, 1989 notice. It uses the well-known "two-people- per-bedroom-plus one" standard. If a complaint is accepted, a non-exhaustive list of factors is consulted to determine if there has been a violation. The factors overlap with those in the Keating Memorandum, but are somewhat distinct.

Familial status was cited as the basis for discrimination in 13 complaints filed with the FHCRC in the past 5 years. During the roughly same 5-year period, four familial status complaints were filed with HUD, though it is unknown if family size was the issue.

FHCRC also provides tenant/landlord counseling services to Riverside residents. Between FY 2019 and FY 2023, FHCRC received over 18,000 tenant/landlords complaints. About 213 (1.2 percent) of these were related to occupancy standards.

#### *Reasonable Accommodations*

HUD and the DOJ describe a reasonable accommodation for purposes of the Act as follows:

A "reasonable accommodation" is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Since rules, policies, practices, and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities exactly the same as others will sometimes deny them an equal opportunity to use and enjoy a dwelling. The Act makes it unlawful to refuse to make reasonable accommodations to rules, policies, practices, or services when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling.

Data on the failure to permit a reasonable accommodation are maintained neither by the State CRD nor the FHCRC. However, residents filing discrimination complaints on the basis of disability often identify "failure to make reasonable accommodation" as the alleged

discriminatory act. Fourteen of the 39 complaints filed by Riverside residents described the “failure to make a reasonable accommodation” as one of the alleged acts.

The majority of housing discrimination complaints filed with the FHCRC had disability as their basis. It is likely that many of these complaints were made because of failure to allow a reasonable accommodation.

In addition, during testing for reasonable accommodations, FHCRC have observed instances where housing providers do not permit the following:

- Allowing a live-in caregiver or assistance animal (note that assistance animals are not considered pets)
- Emotional support animals
- Limiting the assistance animal based on generalized assumptions about certain species or breeds.

The outcomes of these practices by housing providers have resulted in positive test findings (reasonable accommodations denied), particularly in apartment communities that enforce breed restrictions.

#### *Reasonable Physical Modifications*

According to HUD: “A reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications can include structural changes to interiors and exteriors of dwellings and to common and public use areas. A request for a reasonable modification may be made at any time during the tenancy. The Act makes it unlawful for a housing provider or homeowners’ association to refuse to allow a reasonable modification to the premises when such a modification may be necessary to afford persons with disabilities full enjoyment of the premises.”<sup>16</sup>

Data are unavailable from the FHCRC, CRD and HUD concerning the incidence of housing discrimination complaints made because of the failure to allow a reasonable physical modification. HUD does publish data on this issue or alleged act. These data show that during the past five years, 14 complaints were made because of a “failure to permit a reasonable accommodation.”

#### *Service and Companion Animals*

Under Federal and State fair housing laws, individuals with disabilities may ask their housing provider to make reasonable accommodations in the “no pets” policy to allow for their use of a service and/or companion animal. Under the law, such animals are not considered pets. The housing provider may ask the disabled applicant/tenant to provide verification of the need for the animal from a qualified professional. Once that need is verified, the housing provider must generally allow the accommodation.

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<sup>16</sup> Source: U.S. Department of Justice, Civil Rights Division and U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, Joint Statement on Reasonable Modifications Under the Fair Housing Act, March 5, 2008, page 3

Data are unavailable from the FHCRC, CRD and HUD concerning denials of service or companion animals. As stated earlier, these incidents may be reported as failure to make reasonable accommodations or discrimination on the basis of disabilities when making discrimination complaints. Mental disability was cited in 17 of the discrimination complaints filed with FHCRC between FY 2019 and FY 2023. In addition, failure to make reasonable accommodation was listed in 14 of the discrimination complaints filed with HUD during the same time period.

#### *Section 8 Voucher Holders*

In 2019, the State passed SB 329 and SB 222, expanding the source of income protection. Under SB 329 and SB 222, all landlords in California will be required to accept Section 8 and Veterans Affairs Supportive Housing (VASH) vouchers and other forms of rental assistance and to consider them as part of an applicant's income. Both went into effect on January 1, 2020. In addition, AB 1482 was passed in 2019 to establish a cap on annual rent increase at 5 percent plus inflation and to enumerate the just causes to evict a tenant. This bill also prohibits ads stating "No Section 8."

Between 2019 and 2023, FHCRC received 14 discrimination complaints citing source of income protection as the basis for discrimination. However, in FY 2022 and FY 2023 source of income discrimination complaints increased the most to four and six, respectively (while in previous years only one to two complaints were filed).

#### *Other Property Management Discriminatory Practices*

For purposes of preparing its annual report, the National Fair Housing Alliance (NFHA) collects data from private fair housing organizations based on the most common types of housing transactions: rental, real estate sales, mortgage lending, homeowners insurance, harassment, advertising, and HOA/Condo based on protected class. Housing discrimination occurs most often in the rental market, and the complaints reported in 2022 were overwhelmingly rental-related complaints (83 percent, 27,226 complaints of 33,007 complaints recorded). The prevalence of discrimination in the rental market over other types of transactions is because it is the most common and frequent type of housing transaction and because it is easier to detect discrimination due to the simplicity of the transaction itself. Testing for rental discrimination is far more straightforward than testing for a real estate sales or mortgage lending case.

Table 59: Housing Discrimination Complaints by Transaction Type in 2022		
Type	Number of Complaints	Percentage Distribution
Rental	27,336	82.8%
Sales	917	2.8%
Lending	365	1.1%
Insurance	31	0.1%
Harassment	915	2.8%
Advertising	206	0.6%
HOA/Condo	227	0.7%
Other	3,010	9.1%
Total		100.0%
Source: National Fair Housing Alliance (NFHA), 2023 Fair Housing Trends Report. <a href="https://nationalfairhousing.org/wp-content/uploads/2023/08/2023-Trends-Report-Final.pdf">https://nationalfairhousing.org/wp-content/uploads/2023/08/2023-Trends-Report-Final.pdf</a>		

As previously reported, 39 Riverside residents filed housing discrimination complaints between January 2019 and June 2024. Among the discriminatory practices alleged in the complaints are the following:

- Discriminatory refusal to rent
- Discriminatory refusal to negotiate for rental
- Discriminatory terms, conditions, privileges, or services and facilities
- False denial or representation of availability
- Discriminatory advertising, statements and notices
- Discriminatory acts under Section 818 (e.g., coercion)

The FHCRC does not collect data on the alleged acts when housing discrimination complaints are filed with the organization. However, FHCRC does reports on the number of tenant/landlord complaints made. From FY 2019 to FY 2023, there were 18,234 rental complaints, with the most common issues being related to notices, lease agreements, repairs, and rental assistance.

Table 60: Tenant/Landlord Complaints, FY 2019/2020 to FY 2023/2024		
Case Categories	# of Complaints	% of Complaints
Notices	3,227	17.7%
Lease/Rental Terms	2,499	13.7%
Repairs	2,491	13.7%
Rental Assistance	2,294	12.6%
Other	1,487	8.2%
Eviction	1,289	7.1%
Rent Increases	940	5.2%
Affordable Housing	765	4.2%
Deposits	622	3.4%
Section 8 Issues/Information	529	2.9%
Entering/Harassment	503	2.8%
Habitability	324	1.8%
Mold	320	1.8%
Lead	318	1.7%
Occupancy Standards	213	1.2%
Homeless Assistance Referrals	205	1.1%
Mobile Homes	86	0.5%
Foreclosure Issues	68	0.4%
Late Fees	54	0.3%
Total	18,234	100.0%

Source: Fair Housing Council of Riverside County Quarterly Reports FY 2019 to FY 2023.

## Conclusions and Recommendations

Riverside's rental market faces fair housing challenges, particularly concerning occupancy standards, accessibility for individuals with disabilities, and income-based discrimination. The enforcement of Residential Occupancy Standards (ROS) can impose restrictions that disproportionately affect families, especially those with children, leading to potential discrimination against larger and nontraditional family structures. Also, discriminatory practices related to familial status, denial of reasonable accommodations, and refusals to rent to Section 8 voucher holders are common. Addressing these issues requires expanding educational outreach, particularly to smaller rental property managers, and increasing compliance monitoring and enforcement to protect vulnerable populations.

The following actions will be implemented to remove or mitigate this impediment to fair housing choice:

- Continue to offer workshops and seminars to property managers and renters.
- 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
- FHCRC will update model written property management policies that it will transmit to property management firms.

## 6.8 Discriminatory Advertising

Rental advertisements cannot include discriminatory references. Of a total of 97 rental listings posted on Zillow.com between April and June 2024. From a 20 percent sample from the listings (20 listings), none contained overt discriminatory language. However, 11 listings contained potentially discriminatory language, all related to their pet policy. These listings have breed restrictions, size limitations, or outright prohibitions on pets that could impact individuals who require assistance animals as reasonable accommodations under fair housing laws. In one instance, the listing read that “All applications will require a pet screening prior to final approval whether you have pets or not, including service animals.”

Persons with disabilities are one of the protected classes under fair housing law, and apartments must allow “service animals” and “companion animals,” under certain conditions. Service animals are animals that are individually trained to perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, alerting and protecting a person who is having a seizure, or performing other special tasks. Service animals are working animals, not pets. Companion animals, also referred to as assistive or therapeutic animals, can assist individuals with disabilities in their daily living and as with service animals, help disabled persons overcome the limitations of their disabilities and the barriers in their environment.

Persons with disabilities have the right to ask their housing provider to make a reasonable accommodation in a “no pets” policy to allow for the use of a companion or service animal. However, in the case of rental ads that specifically state “no pets,” some persons with disabilities may not be aware of their right to ask for an exception to this rule. Because of this, a person with a disability may see themselves as limited in their housing options and a “no pets” policy could, therefore, be interpreted as potentially discriminatory. It's essential for these properties to clarify their policies regarding assistance animals to ensure compliance with fair housing regulations.

## Conclusions and Recommendations

The rental listings reviewed did not contain discriminatory terms or phrases. Therefore, no impediment to fair housing choice was found to exist because of discriminatory advertising.

## 6.9 Hate Crimes

Hate crimes are crimes committed because of a bias against race, religion, disability, ethnicity, or sexual orientation. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting Program collects statistics on these incidents.

To a certain degree, hate crimes are an indicator of the environmental context of discrimination. These crimes should be reported to the Police or Sheriff's department. On the other hand, a hate incident is an action or behavior that is motivated by hate but is protected by the First Amendment right to freedom of expression. Examples of hate incidents can include name calling, epithets, distribution of hate material in public places, and the display of

offensive hate-motivated material on one's property. The freedom guaranteed by the U.S. Constitution, such as the freedom of speech, allows hateful rhetoric as long as it does not interfere with the civil rights of others. Only when these incidents escalate can they be considered an actual crime.

Hate crime statistics compiled by the Federal Bureau of Investigation (FBI) show that a total of 70 hate crimes were committed in Riverside over the most recently reported five-year period. Most of the hate crimes committed in the City were based on race or ethnicity (74 percent, **Table 61**). Hate crime victims were predominantly Black or African American (29 victims), Hispanic or Latino (five victims), or White (five victims). The incidents occurred most often in residence homes (14 crimes), on highways, alleys, streets, or sidewalks (14 crimes), and in schools (13 crimes). According to the FBI, the most common offenses reported were aggravated assault (24 crimes), vandalism (20 crimes), and intimidation (19 crimes).

Table 61: Hate Crimes (2018-2022)							
	2018	2019	2020	2021	2022	Total	%
Race/ Ethnicity/ Ancestry	9	10	10	12	11	52	74.3%
Religion	1	1	2	0	3	7	10.0%
Sexual Orientation	0	4	3	2	2	11	15.7%
Disability	0	0	0	0	0	0	0.0%
Gender	0	0	0	0	0	0	0.0%
Gender Identity	0	0	0	0	0	0	0.0%
Multiple Bias	0	0	0	0	0	0	0.0%
Total	10	15	15	14	16	70	100.0%
Source: U.S. Department of Justice Federal Bureau of Investigation, Crime Data Explorer. Hate crime data reported by Riverside Police Department, Riverside Community College, and University of California: Riverside, 2017-2022.							

Housing-related hate activity most often includes harassment/intimidation or retaliation. According to HUD regulation 4 C.F.R. § 100.400, it is unlawful to: (1) Threaten, intimidate, or interfere with persons in their enjoyment of a dwelling because of their protected class or the protected class of visitors/associates, (2) Intimidate or threaten any person because that person is engaging in activities designed to make other persons aware of, or encouraging such other persons to exercise, fair housing rights, (3) Retaliate against any person because that person has made a complaint, testified, assisted, or participated in any manner in a proceeding under the Fair Housing Act. As shown in **Table 60**, 503 entering/harassment complaints were made with FHCRC by Riverside residents between FY 2019 and FY 2023, though it is unknown if these complaints were discriminatory acts.

## Conclusions and Recommendations

Hate crimes, primarily motivated by race and ethnicity according to FBI statistics, highlight significant disparities and vulnerabilities faced by minority groups. The prevalence of these crimes in residential settings, schools, and public spaces underscores the pervasive nature of discrimination that affects individuals' daily lives.



Addressing hate crimes and housing-related discrimination requires a multifaceted approach. The following actions are recommended to remove or mitigate this impediment to fair housing choice:

- FHCRC will collaborate with local universities and schools to ensure vulnerable communities are informed about their rights and have access to resources to supported their housing needs.
- FHCRC will educate residents to recognize and report hate incidents promptly as part of their fair housing workshops.

## 7. Private and Public Sector Fair Housing Impediments Analysis

Many fair housing issues are not exclusively within the domain of either the private or public sectors. This AI presents an analysis of three potential public/private sector impediments to fair housing choice.

### 7.1 Fair Housing Services

The analysis of fair housing services, including enforcement and outreach activities, is crucial to understanding their impact on fair housing choice. Significant challenges such as limited resources and awareness of fair housing rights often hinder effective enforcement efforts. This can lead to underreporting of discrimination incidents, missed opportunities for legal recourse, and the persistence of discriminatory practices within housing markets. To address these issues, efforts are needed to enhance awareness through training programs for housing industry professionals, public education campaigns, advocacy endeavors, and enforcement measures.

#### 1. Fair Housing Council of Riverside County (FHCRC)

##### *Education and Outreach*

Fair Housing Council of Riverside County (FHCRC) takes part in a variety of activities to fight housing discrimination, such as free educational workshops, outreach to the community, and the investigation of housing discrimination complaints. The capacity of the FHCRC enables it to provide fair housing information, outreach and enforcement to 24 cities and communities located in Riverside County plus the unincorporated area of the County.

The FHCRC provides a full range of services including:

- Anti-discrimination
- Landlord/tenant counseling
- First time homebuyer seminars
- Foreclosure prevention
- Loan modification
- Back-to-Work FHA
- Training

The funding that supports the efforts of the FHCRC includes Community Development Block Grant (CDBG) funds received from participating jurisdictions within its service area and grant funds such as Fair Housing Initiatives Program (FHIP) and Fair Housing Assistance Program (FHAP) provided by HUD's Office of Fair Housing and Equal Opportunity (FHEO).

FHIP provides funds to eligible organizations through competitive grants under three initiatives that are designed to prevent or eliminate discriminatory housing practices and inform individuals of their rights and responsibilities under the Fair Housing Act: Private Enforcement Initiative, Education and Outreach Initiative, and Fair Housing Organizations

Initiative. The FHCRC was awarded a FHIP grant of \$300,000 in 202X to undertake various enforcement, education and outreach activities that Affirmatively Further Fair Housing. The activities are designed to minimize and eliminate impediments to fair housing choice. Specifically, FHCRC conducts systemic investigations, provides technical assistance to municipalities regarding compliance with fair housing laws, and provide fair housing education to the population of Riverside County.

### **Fair Housing Initiatives Program**

The Fair Housing Initiative Program (FHIP) administered by FHCRC has had a profound impact on promoting fair housing practices and combating discrimination across Riverside County in the past five years. Through robust outreach and education initiatives, FHCRC reached thousands of residents annually, empowering them with crucial knowledge of their fair housing rights and responsibilities. Workshops and educational sessions covered a wide array of topics, including tenant rights, landlord responsibilities, and protections against discrimination based on race, disability, familial status, and more. These efforts not only informed residents but also equipped them with tools to identify and report housing discrimination, ensuring fair treatment in housing transactions.

FHCRC's collaborations with local universities, such as UC Riverside, demonstrated a commitment to addressing specific housing challenges faced by international students and other marginalized groups. By tailoring educational outreach to these populations, FHCRC ensured that vulnerable communities were informed about their rights and had access to resources that supported their housing needs.

Furthermore, FHCRC's participated in community events, town hall meetings, and formed partnerships with local organizations and government agencies to foster broader community awareness and support for fair housing principles. In the past five years, FHCRC hosted or participated in events that reached over 14,000 persons. These activities included:

- Hosting Fair Housing, First-Time Homebuyer, and Tenant's Rights Workshops; Workshops on Disability
- Providing Fair Housing Trainings to management organizations and realtors
- Attending community events such as Long Night of Arts and Innovation, The Group Annual Breakfast, Casa Blanca Customer Resource Center Open House, Town Hall Meetings, Jazz Festival at White Park, Park Avenue Missionary Baptist Church event outreach, Northside Improvement Association meeting
- Meeting with City Council Staff and participating in Planning class between HCAs and Freedom Mortgage.

During the COVID-19 pandemic, FHCRC adapted by leveraging virtual platforms to continue delivering educational content and outreach efforts. This approach enabled the organization to maintain its educational mission amidst challenging circumstances, including navigating eviction moratoriums and other housing-related crises exacerbated by the pandemic.

FHCRC partnered with Wakeland Housing and Development Corporation to build Mission Heritage Plaza, a new complex that includes a Civil Rights Institute and Walk of Fame, new

affordable homes, and offices for the Fair Housing Council in downtown Riverside. Mission Heritage Plaza opened in October 2022 and provides resources to Riverside residents.

### *Enforcement*

The enforcement of fair housing laws is accomplished by HUD, the California Civil Rights Department (CRD, formerly the Department of Fair Employment and Housing, DFEH), and the Fair Housing Council of Riverside County, Inc. (FHCRC). The CRD is responsible for enforcing State fair housing laws that make it illegal to discriminate. The CRD may file signed complaints with HUD if the matter falls within the jurisdiction of that agency. As a substantially equivalent agency, CRD's findings are usually accepted by HUD.

### **Private Enforcement Initiative (FHIP-PEI)**

The Fair Housing Initiatives Program Private Enforcement Initiative (FHIP-PEI) assists people who believe that they have been victims of housing discrimination. FHCRC reviews allegations to determine if there are any violations. If there are any Fair Housing violations, the enforcement agencies are notified. There are two types of enforcement agencies: The Federal Department of Housing and Urban Development (HUD) and the California Civil Rights Department (CRD). Fair housing discrimination complaints are explored in more detail in Chapter 6: Private Sector Fair Housing Impediments Analysis.

Under the Private Enforcement Initiative (FEI) funded by the Fair Housing Initiatives Program, FHCRC conducts extensive site testing across Riverside County to identify violations of fair housing laws. Through paired tests at various properties, FHCRC has uncovered instances where individuals from different demographic backgrounds receive unequal treatment, highlighting systemic issues in housing practices.

For example, one of the trends uncovered through testing and complaint investigation was a rise in sexual harassment during COVID-19. In 2020, FHCRC filed two sexual harassment complaints with HUD and one sexual orientation complaint with CRD. These three cases highlighted a growing trend within the County, as landlords that cannot evict due to non-payment resort to other tactics and differential treatment in the hopes the tenants may vacate on their own. This is also known as a "constructive eviction," which is a term used in the law of real property to describe a circumstance in which a landlord either does something or fails to do something they have a legal duty to provide, rendering the property uninhabitable. In sexual harassment and sexual orientation based discrimination, this could be viewed as constructive eviction when eviction moratoriums prevent legal evictions.

In response to the COVID-19 pandemic, FHCRC played a crucial role in enforcing eviction moratoriums and adapting to virtual platforms like Zoom and GoToWebinar for fair housing education. Collaborating with cities and nonprofit organizations, FHCRC ensured that both housing providers and the public were educated about their rights, particularly under the COVID-19 Tenant Protection Act of 2020 (AB 3088). The initiative included mailing Fair Housing literature and surveys to targeted apartment complexes (selected based on complaints received), focusing on issues such as sexual harassment, which saw an increase during the pandemic. From April to June 2021 alone, FHCRC tested 23 properties and noted an uptick in disability-related discrimination cases compared to other protected classes.

Furthermore, in 2020 FHCRC organized virtual town hall meetings across Riverside County, engaging with stakeholders to discuss tenant protections, fair housing rights, and resources available to residents. These meetings brought together legal experts, housing professionals, and city officials to address emerging challenges exacerbated by the pandemic. Despite challenges posed by COVID-19, FHCRC remained committed to combating discrimination by continuing property testing, surveys, and collaborating closely with enforcement agencies like HUD and CRD. Discriminatory practices, particularly evident in rental processes based on familial status, disability, and race, remain a focal point for ongoing investigations and advocacy efforts.

The 2021-2029 Housing Element concluded that 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. The contributing factors to this impediment were:

- 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

#### *Evaluation of FHCRC Services*

The Fair Housing Council of Riverside County (FHCRC) offers a full array of housing counseling services that affirmatively promote housing rights and obligations. FHCRC is contracted by the City with CDBG funds to offer education, training and technical assistance, enforcement activities, and annual audits with paired testing. However, challenges remain due to limited resources and lack of awareness among residents and landlords on rights and responsibilities under the law.

During stakeholder outreach meetings, FHCRC identified several challenges and emerging trends that need to be addressed to enhance fair housing outcomes in Riverside. A key concern raised was the necessity for expanded outreach efforts, currently constrained by limited funding. Furthermore, the FHCRC noted that while their primary focus has historically been on renter issues, they anticipate emerging challenges related to homeownership that will also require increased attention. For example, rising insurance costs may lead to higher mortgage rates, resulting in a surge in foreclosures. This issue is particularly alarming as it disproportionately impacts low- to moderate-income families, many of whom are already facing financial hardships.

A particularly emerging concern stems from recent changes in the real estate commission process, which came into effect in August 2024. According to the 2022 National Association of Realtors' President Leslie Rouda Smith, these changes, which require homebuyers to pay brokers directly, are expected to significantly increase closing costs.<sup>17</sup> According to a recent study, this shift could disproportionately affect Black and Hispanic/Latino families, making it harder for them to qualify for mortgages. This is alarming because these groups already face

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<sup>17</sup> <https://www.housingwire.com/articles/opinion-changing-real-estate-compensation-harms-fair-housing/>

considerable barriers to homeownership, and higher closing costs would exacerbate existing racial disparities in housing. This change could undermine fair housing efforts by reducing access to affordable housing, particularly for low-income and minority buyers.

To effectively address the emerging fair housing challenges in Riverside, including issues in the homebuyer market such as rising insurance costs and changes to real estate commission structures, FHCRC will likely require increased funding and an expanded scope of services. These resources are essential for enhancing outreach, housing counseling, and legal support to ensure equitable access for low-income and minority communities amid these evolving challenges.

## 2. California Civil Rights Department (CRD)

The California Civil Rights Department (CRD) provides a variety of fair housing services to ensure equal housing opportunities and to prevent discrimination. One of their primary services is the investigation of complaints. Enforcement is another critical service provided by the CRD. The department takes legal action against individuals or entities that violate state fair housing laws. In addition to enforcement, the CRD conducts education and outreach programs. These programs are designed to inform the public, housing providers, and tenants about their rights and responsibilities under fair housing laws, promoting awareness and understanding of these important regulations.

The CRD also offers mediation and conciliation services to help resolve disputes related to fair housing. These services provide an alternative to litigation, allowing landlords and tenants or buyers and sellers to settle their differences amicably. Furthermore, the department provides technical assistance to housing providers and the general public, helping them understand and comply with fair housing laws. This technical assistance can include guidance on best practices and legal requirements to prevent discrimination.

Finally, the CRD is involved in policy development and advocacy. The department works on developing policies and advocating for legislation that promotes fair housing and addresses systemic discrimination in housing. By engaging in policy work and advocacy, the CRD aims to create a more equitable housing environment for all residents of California.

## 3. HUD's Office of Fair Housing and Equal Opportunity (FHEO)

Similar to the California Civil Rights Department (CRD), HUD's Office of Fair Housing and Equal Opportunity (FHEO) provides a range of services to ensure fair housing and prevent discrimination including investigation of complaints, enforcement, education and outreach, policy development, and technical assistance.

A critical component of FHEO's efforts is the Fair Housing Initiatives Program (FHIP), which provides funding to support organizations dedicated to eliminating housing discrimination. The FHIP supports a variety of activities, including educational campaigns, enforcement efforts, and testing to uncover discriminatory practices. It also funds research and data collection to better understand and address housing discrimination trends. As stated earlier, FHCRC has received grant funding from FHIP to provide fair housing services in the City of Riverside and Riverside County.

#### 4. Inland Valleys Association of Realtors (IVAR)

The Inland Valleys Association of REALTORS (IVAR) offers several fair housing services and resources aimed at promoting professional standards and ethical practices within the real estate community. Some of their key services include:

1. **Professional Standards and Ethics:** IVAR has a dedicated Professional Standards Committee that oversees disciplinary proceedings related to ethical violations and professional misconduct among REALTORS. This includes issues such as misleading advertising, failure to disclose necessary information, and improper handling of client relationships. The committee can impose sanctions ranging from warnings to suspension or expulsion from the association.
2. **Education and Training:** IVAR provides training and educational resources to ensure that its members are knowledgeable about fair housing laws and best practices. This helps realtors maintain compliance with legal standards and ethical guidelines.
3. **Advocacy and Support:** The association actively engages in legislative advocacy to support fair housing policies and practices. This includes working with local, state, and national organizations to influence policies that promote fair housing and protect consumers' rights. Specifically, IVAR's Fair Housing and Diversity Committee advocates for fair housing practices and equal opportunities in housing while promoting diversity within the real estate industry. The committee works to engage members from diverse backgrounds, develop and implement educational programs and special events, and maintains a dedicated "Fair Housing & Diversity" webpage. It also collaborates with key stakeholders like the Fair Housing Council and REALTIST, aiming to positively impact fair housing and diversity issues in the Inland Empire through education, visibility, and strategic initiatives.

#### 5. California Apartment Association

The California Apartment Association (CAA) serves a diverse membership base that includes property owners, managers, and real estate professionals involved in the rental housing industry. CAA provides educational programs, such as workshops and online courses, that cover topics like tenant screening, reasonable accommodation requests, and anti-discrimination practices. These training sessions help members stay informed about current fair housing laws and best practices.

The association also offers expert legal support, including access to legal counsel and resources for handling discrimination claims and navigating complex regulatory issues. For example, CAA's legal team can assist members in drafting compliant rental agreements and responding to complaints of discriminatory practices.

In addition, CAA engages in active advocacy to influence fair housing policies at local, state, and national levels. This includes participating in legislative lobbying, submitting comments on proposed regulations, and working with policymakers to promote balanced and effective housing laws.

## Conclusions and Recommendations

No impediment to fair housing exists because of the lack of an *organization* to enforce or educate on fair housing laws. The analysis reveals that fair housing services, such as those provided by the Fair Housing Council of Riverside County (FHCRC), play a critical role in promoting fair housing choice and combating discrimination. However, challenges remain due to limited resources, underreporting of discrimination incidents, and lack of awareness among residents, landlords and housing professionals on rights and responsibilities under the law. FHCRC's efforts in education, outreach, and enforcement have made significant strides, but more comprehensive strategies are necessary to ensure that fair housing laws are effectively enforced and that vulnerable communities are protected.

### 7.2 Integration/Segregation

A major objective of the federal Housing and Community Development Act of 1974 was “the reduction of the isolation of income groups within communities and geographical areas and the promotion of an increase in the diversity and vitality of neighborhoods through the spatial deconcentration of housing opportunities for persons of lower income and the revitalization of deteriorating or deteriorated neighborhoods.” Consequently, examining integration and segregation is crucial in fair housing analysis to provide insights into how housing opportunities are distributed across communities and the extent to which disparities exist.

California AB 686 required cities to include an Assessment of Fair Housing as part of the Sixth Cycle Housing Element update. To assist in the analysis, HCD created an AFFH Mapping Tool that provides geographic mapping capabilities to visualize and analyze housing patterns, demographic data, socioeconomic characteristics, and other relevant factors related to fair housing. The City of Riverside used this mapping tool for its AFFH in the 2021-2029 Housing Element. This AI incorporates the latest available data from the AFFH Mapping tool, expanding its analysis and including additional maps and characteristics to enhance understanding and planning efforts.

#### 1. Tenure

Tenure, whether individuals own or rent their homes, directly influences neighborhood demographics and community dynamics. Homeownership often signifies stability and investment in a community, potentially fostering integration if diverse groups of homeowners reside together. Conversely, patterns in rental tenure can reveal segregation if certain racial or socioeconomic groups are disproportionately concentrated in specific neighborhoods.

Renter households are concentrated in west and northern neighborhoods of the city, specifically in Arlanza, University, Hunter Industrial Park, and Downtown. These patterns may be attributed to the development history and zoning of these neighborhoods (**Figure 14**).

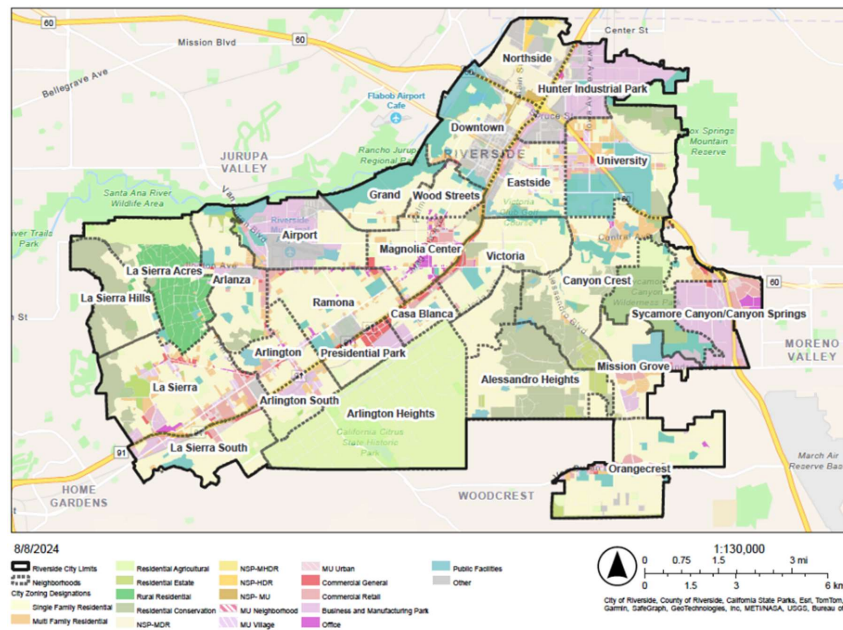
- Arlanza: Previously the grounds for Camp Anza, this is one of the most geographically diverse neighborhoods of the City as it contains a mix of nearly every type of land use found in Riverside. Arlanza's residential areas range from semi-rural home sites to high density apartments, with much of the residential area made up of medium density



single-family tract development. The neighborhood also includes intensive urban commercial and industrial development.

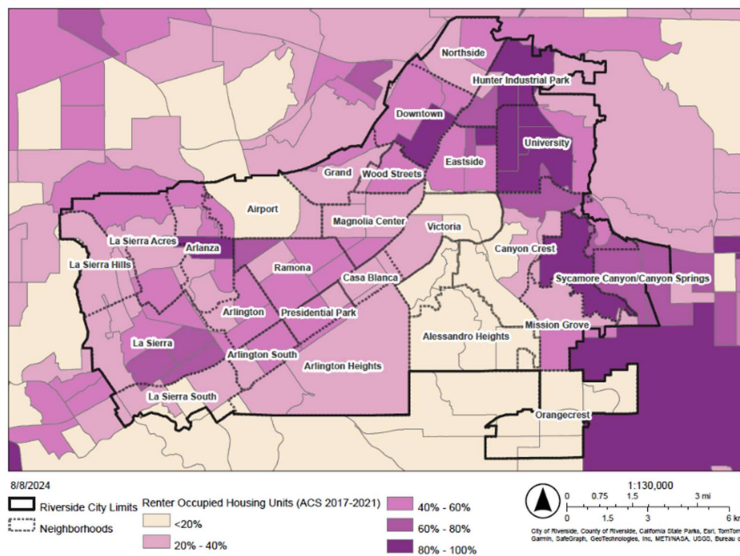
- **University:** The University neighborhood draws its name from Riverside's University of California campus and offers a unique mix of land uses, ranging from high-density student-oriented apartments to a thriving center of commerce and entertainment, to low density hillside housing and finally to large sections of farmland. Renter concentration is high likely due to the large student population residing in this area. However, a large residential neighborhood that occupies a quarter of this region is almost hidden behind the UC Riverside.
- **Hunter Industrial Park:** This neighborhood consists almost entirely of industrial and commercial office development, with a small single-family residential area situated near the interchange of the 60 Freeway and I-215.
- **Downtown:** Downtown Riverside serves as both the cultural epicenter and historic heart of the City. It is home to numerous governmental, educational, and cultural landmarks, offering a vibrant mix of businesses, public facilities, parks, and community amenities.

**Figure 14: Riverside Zoning Designation Map**



**Figure 15** shows Sycamore Canyon Park (dark purple area south of Canyon Crest) as an area with a concentration of renters, however, this area is mostly covered by a park and is estimated to only have 12 housing units. Similarly, Sycamore Canyon/Canyon Springs neighborhood is also shown as having a high concentration of renters, but these areas include no residential properties; rather they are intended to provide for the City’s future when large-scale development occurs.

**Figure 15: Renter Occupied Housing Units**



## 2. Race/Ethnicity

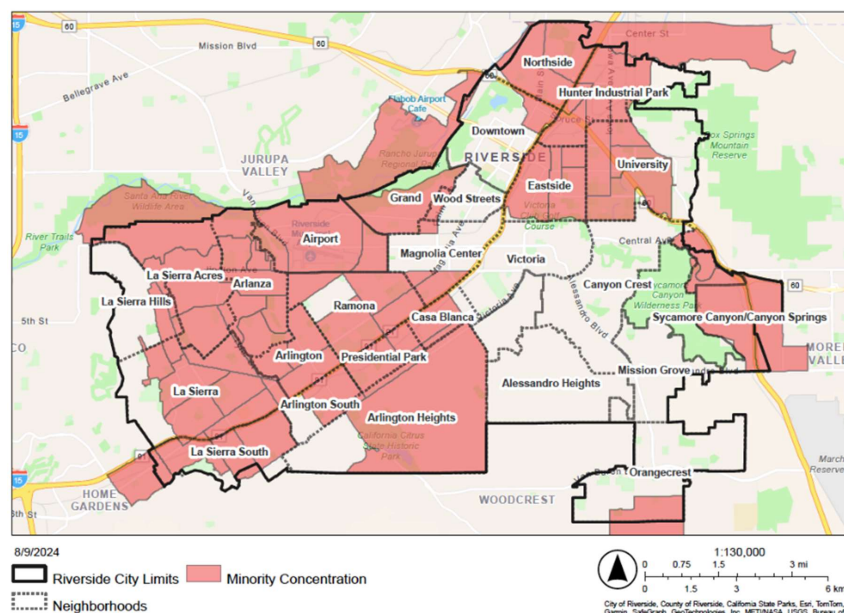
HUD’s 1996 Fair Housing Planning Guide states that “the jurisdiction should describe the degree of segregation by race and ethnicity.” The metrics for measuring level of racial integration/segregation, include:

- Areas of minority population concentration
- Index of Dissimilarity
- Racially/ethnically concentrated areas of poverty (R/ECAPs)

### *Areas of Minority Population*

An area of minority concentration is defined as a Census tract whose proportion of minority population is greater than the overall Riverside County average of 67.6 percent. As shown in **Figure 16**, minority concentration tracts are located in west Riverside in La Sierra Acres, La Sierra, La Sierra South, Arlanza, Arlington, Arlington Heights, and Casa Blanca as well as in Eastside, Northside, Hunter industrial Park, and University in northern Riverside. Sycamore Canyon/Canyon Springs is also considered an area of minority concentration.

**Figure 16: Areas of Minority Concentration**



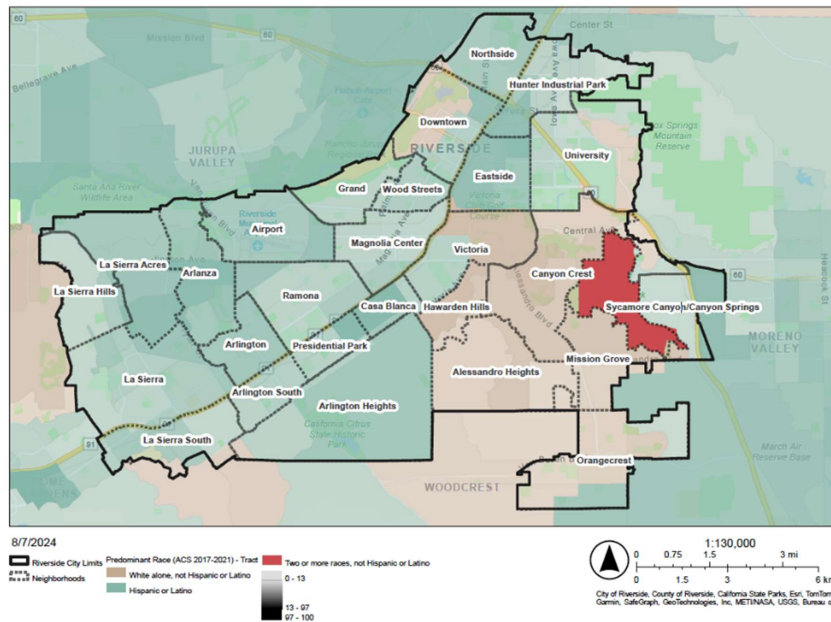
**Figure 17** shows the predominant races by tract and Riverside’s Hispanic or Latino-identified population are primarily predominant in the western part of the City, also including the Arlanza, La Sierra Acres neighborhoods; in the central portion of the City around the 91 Freeway (Casa Blanca and Arlington Heights); and in the Eastside neighborhood immediately to the east of Downtown. According to the AFFH assessment in the 2021-2029 Housing Element, 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 20<sup>th</sup> 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.

Minority communities developed and later flourished in Eastside and Casa Blanca due in part to the de facto and de jure segregation that prohibited many 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 17: Predominant Races**



### *Index of Dissimilarity*

Dissimilarity indices are measures of segregation, with higher indices meaning a higher degree of segregation (<40 is low, 40-55 is moderate, >55 is high).<sup>18</sup> The dissimilarity index can be interpreted as the share of one group that would have to move to a different tract to create perfect integration for these two groups.

In Riverside, minority (non-white) residents overall are not considered segregated from White residents, with a segregation index of 39.21 in 2022. Each racial group's segregation index also falls below 40, indicating relatively low segregation levels. However, segregation between each racial group and Whites has increased over the past 30 years, except for between Black and White residents. The most significant increase was seen between Asian and White residents, with dissimilarity indices increasing by 12 points over the past 30 years.

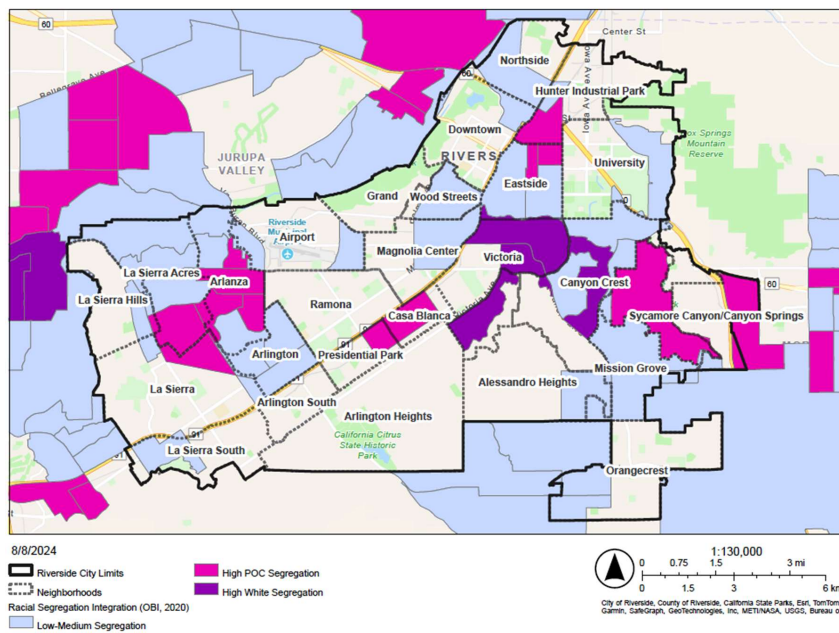
<sup>18</sup> [Lessons from the Ground: Best Practices in Fair Housing Planning](#), HUD. [\[this URL does not work\]](#)

Table 62: Dissimilarity Indices (1990 to 2022)					
	1990 Trend	2000 Trend	2010 Trend	2020 Trend	2022 Trend
Non-White/White	26.85	29.33	30.14	33.15	29.21
Black/White	31.29	25.94	24.81	30.46	30.21
Hispanic/White	31.53	33.85	33.83	37.00	32.37
Asian or P.I./White	20.77	27.52	31.81	36.2	32.71

Sources: Affirmatively Furthering Fair Housing Data and Mapping Tool, Table AFFH-6, 2020. Dissimilarity calculator, 2023.  
<https://www.hudexchange.info/resource/6870/lessons-from-the-ground-best-practices-in-fair-housing-planning-dissimilarity-index/>

**Figure 18** shows racial segregation/integration measures from 2020 by tract based on methodology from the Othering & Belonging Institute. Their measures show that high minority segregation is located across neighborhoods in the City: Arlanza and Casa Blanca in the west, parts of Eastside and Hunter Industrial Park neighborhoods in the North, and Sycamore Canyon in the south. On the other hand, White residents are segregated from other races Victoria and Canyon Crest, areas which are also identified as having a predominance of White population in **Figure 17** above.

**Figure 18: Integration/Segregation**

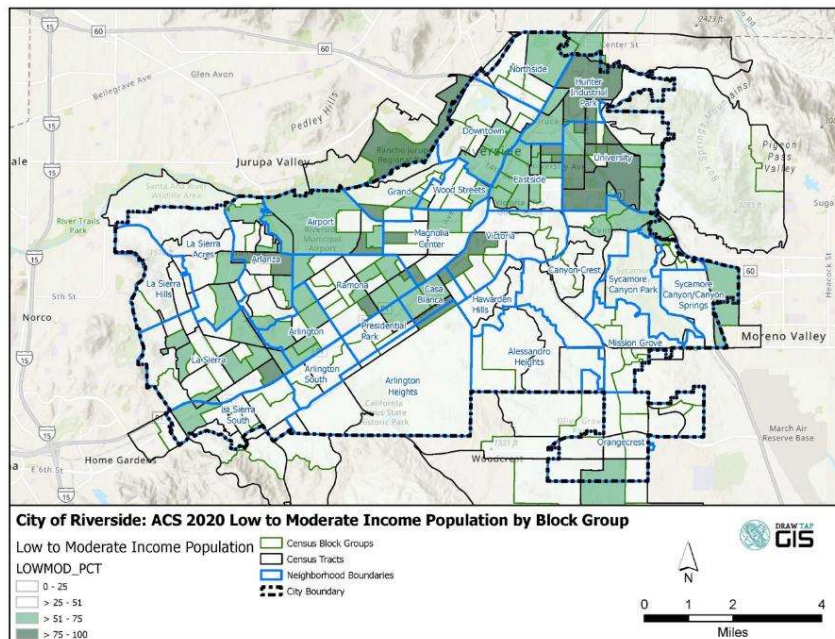




### 3. Low and Moderate Income Population

HUD defines a Low and Moderate Income (LMI) area as block group where over 51 percent of the population is low- and moderate-income. **Figure 19** identifies that LMI areas in the City by tract are concentrated in west and north Riverside in the neighborhoods of Arlanza, Airport, and Casa Blanca in west Riverside and Eastside, Hunter Industrial Park, and University in north Riverside. These neighborhoods correspond to the some of the areas with a concentration of minorities and high People of Color (POC) segregation.

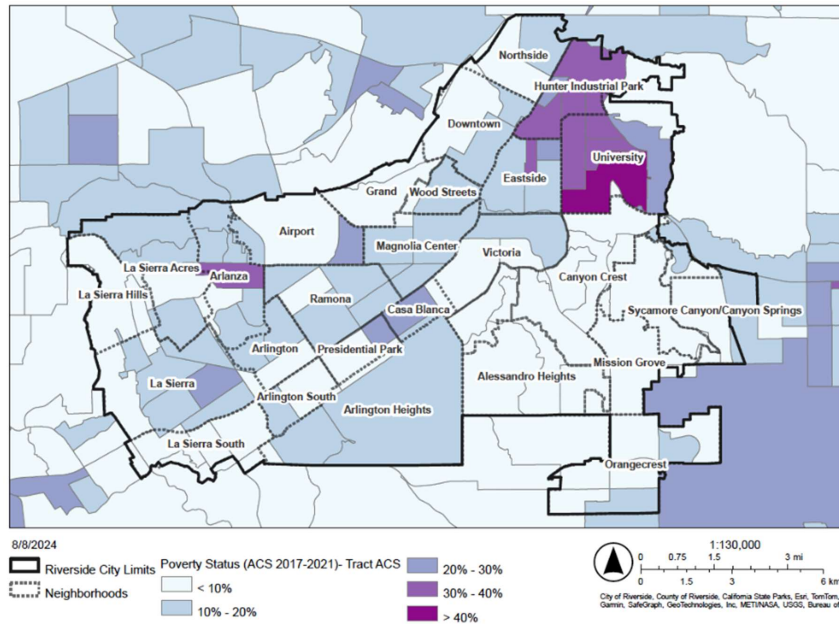
### Figure 19: Low to Moderate Income Population



### Poverty Status

While low and moderate income areas have a cutoff threshold of 51 percent low moderate income persons within a tract, poverty status measures the percentage of the population whose income falls below the Federal poverty line. In Riverside, areas with the highest concentration of poverty correlate to those low and moderate income areas in Arlanza and north Riverside (**Figure 20**). However, **Figure 20** also shows that other neighborhoods in west and north Riverside, especially along Magnolia Avenue, have relatively higher concentrations of poverty.

**Figure 20: Poverty Status**



#### 4. Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs)

To assist communities in identifying racially or ethnically concentrated areas of poverty (R/ECAPs), HUD developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test:

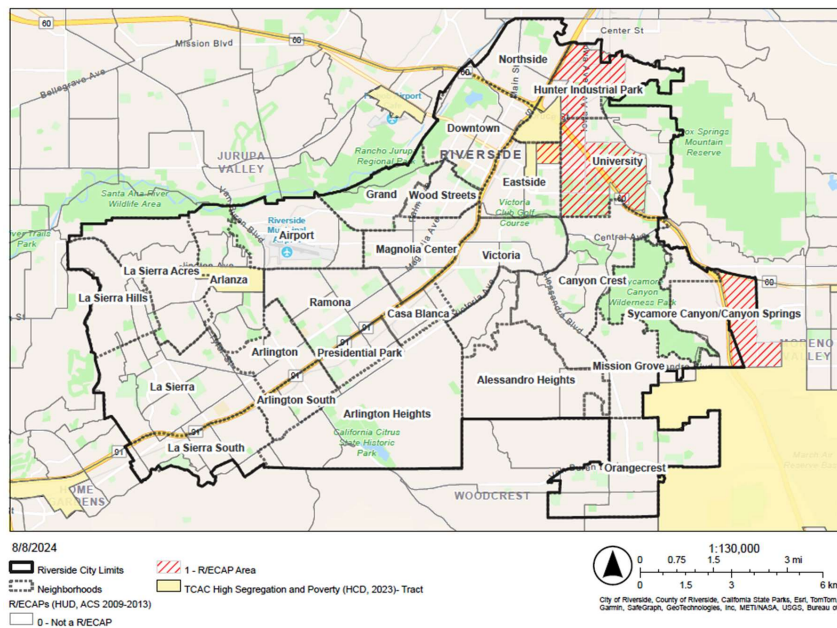
- A nonwhite population of 50% or more
- A poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan area, whichever threshold is lower

RECAPs are located in the northern parts of the City in the Hunter Industrial Park and University neighborhoods (**Figure 21**, red hashed areas).

HUD's data sources for R/ECAPs have not been updated since 2013. Because of this, the City also includes an analysis of areas of High Segregation and Poverty as identified in the 2021-2029 Housing Element using TCAC/HCD's mapping tool. TCAC/HCD's areas of High Segregation and Poverty 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.

A cluster of four of these areas is in the northern part of the City surrounding Downtown and includes tracts in the Eastside and Hunter Industrial neighborhoods (**Figure 21**, yellow areas). The other tract with High Segregation and Poverty is in Aranza, which as pointed earlier has a high concentration of Hispanic population and higher concentrations of industrial land uses.

**Figure 21: Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) and High Segregation and Poverty Areas**

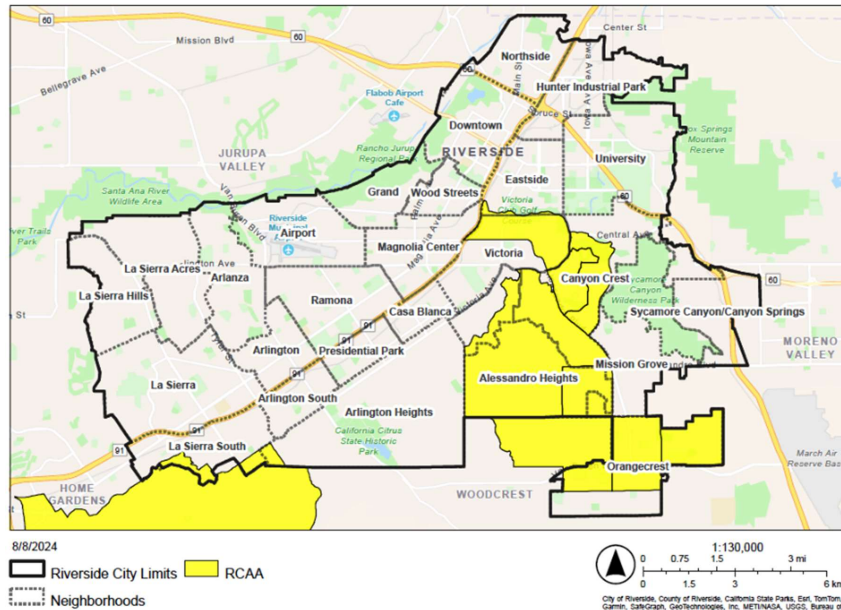


## 5. Racially Concentrated Areas of Affluence (RCAAs)

While racially concentrated areas of poverty and segregation (R/ECAPs) 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. According to HUD's policy paper, "Whites are the most racially segregated group in the United States and in the same way neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities." HCD has created a version of the RCAA metric to better reflect California's relative diversity and regional conditions, and to aid local jurisdictions in their analysis of racially concentrated areas of poverty and affluence pursuant to AB 686 and AB 1304. According to HCD's RCAAs data, RCAAs are located in neighborhoods of Canyon Crest, Alessandro Heights, and Orangecrest in southeast Riverside (**Figure 22**).



**Figure 22: Racially Concentrated Areas of Affluence (RCAAs)**



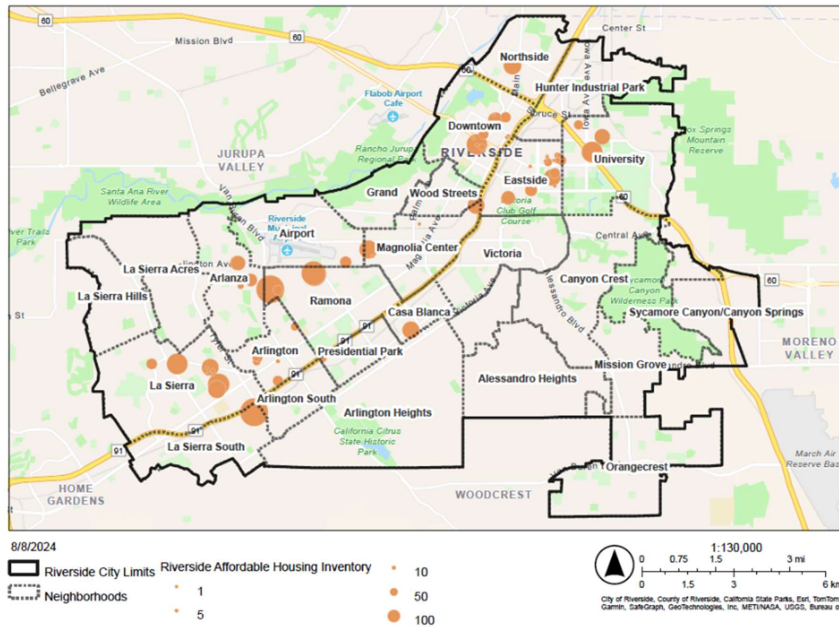
## 6. Assisted Housing

To further fair housing in Riverside, the City provides a range of housing options for all persons. Housing opportunities include conventional single-family and multi-family housing. For those with special needs, however, the City also provides a large inventory of subsidized housing, community care facilities, emergency shelters and transitional housing, as well as other treatment and recovery centers. This section inventories the range of housing opportunities for persons with special needs and displays their general location.

### *Assisted Housing Developments*

Riverside has 63 affordable housing developments, ranging in size from 1 to 268 housing units totaling 4,011 affordable units. According to the 2021-2029 Housing Element, these developments include senior housing, supportive housing, and project-based rental housing. As shown in **Figure 23**, assisted housing is located throughout west and north Riverside. It is notable that assisted housing is not located in areas identified as racially concentrated areas of affluence (**Figure 22** above).

**Figure 23: Riverside Affordable Housing Inventory**



Source: California Housing Partnership (May 2023), 2021-2029 Riverside Housing Element.

Community	Number of Affordable Units
Ramona	780
Eastside	543
La Sierra	516
Downtown	428
Arlanza	368
Arlington	341
Magnolia Center	285
University	278
Northside	156
Casa Blanca	148
Airport	87
Presidential Park	53
La Sierra South	28
<b>Total</b>	<b>4,011</b>

Sources: California Housing Partnership (May 2023) from HCD's AFFH mapping tool, 2021-2029 Riverside Housing Element.

### *Housing Choice Vouchers Rental Assistance*

The Housing Choice Voucher Program (HCV) provides rental assistance to very low-income households who obtain housing in the private rental market. The HCV program's success depends upon the ability of participants to search for and find suitable housing in the private rental market. The program encourages participants to avoid high-poverty neighborhoods and encourages the recruitment of landlords with rental properties in lower-poverty neighborhoods. An analysis of the trends in HCV concentration can be useful in examining the success of the program in improving the living conditions and quality of life of its holders.

HCV programs are managed by Public Housing Agencies (PHAs), and the programs assessment structure (SEMAPS) includes an "expanding housing opportunities" indicator that shows whether the PHA has adopted and implemented a written policy to encourage participation by owners of units located outside areas of poverty or minority concentration. A study prepared by HUD's Development Office of Policy Development and Research found a positive association between the HCV share of occupied-housing and neighborhood poverty concentration and a negative association between rent and neighborhood poverty. This means that HCV use was concentrated in areas of high poverty where rents tend to be lower. In areas where these patterns occur, the program has not succeeded in moving holders out of areas of poverty.

Within Riverside, about 2,068 HCVs are distributed across the City. Census tracts with the highest concentration of HCV renter households are concentrated in west and north neighborhoods of the City though La Sierra, Arlington, Arlanza, Ramona, Magnolia Center, Eastside, Downtown, University, and Industrial Park (**Figure 24**). These areas also have the lowest median gross rents in the City (less than \$1,500, **Figure 25**).<sup>19</sup> This means HCV participants are finding housing in the most affordable areas of the City. In addition, HCV households are also correlated with areas with a concentration of low and moderate income population and areas of minority concentration. As with assisted affordable housing, there are no HCV holds in the areas identified as RCAAs. The Fair Housing Plan should include actions to promote housing mobility through HCV use in higher resource areas.

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<sup>19</sup> In the AFFH Data Viewer Tool, the value shown under the Housing Affordability Index is the median gross rent per census tract. The map showing the Housing Affordability Index (LAI) provides standardized household housing and transportation cost estimates for all 50 states and the District of Columbia. Using ACS 2012-2016 data.

Figure 24: Housing Choice Voucher Concentration

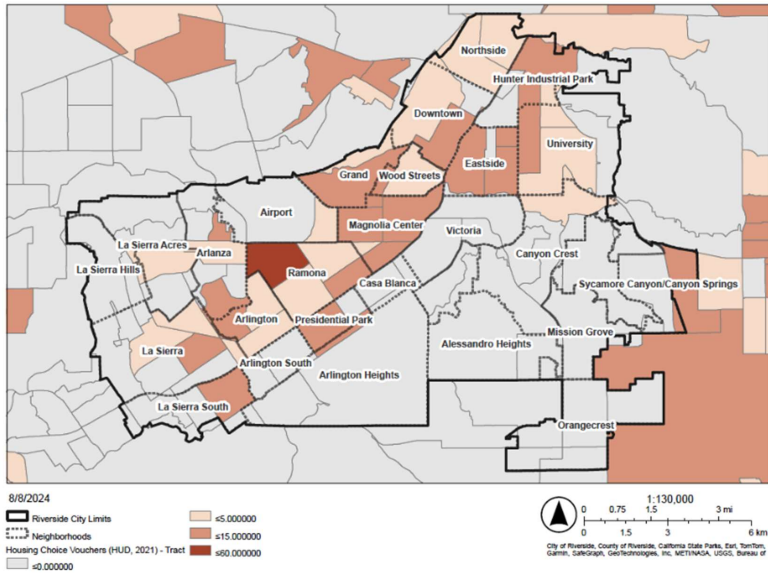
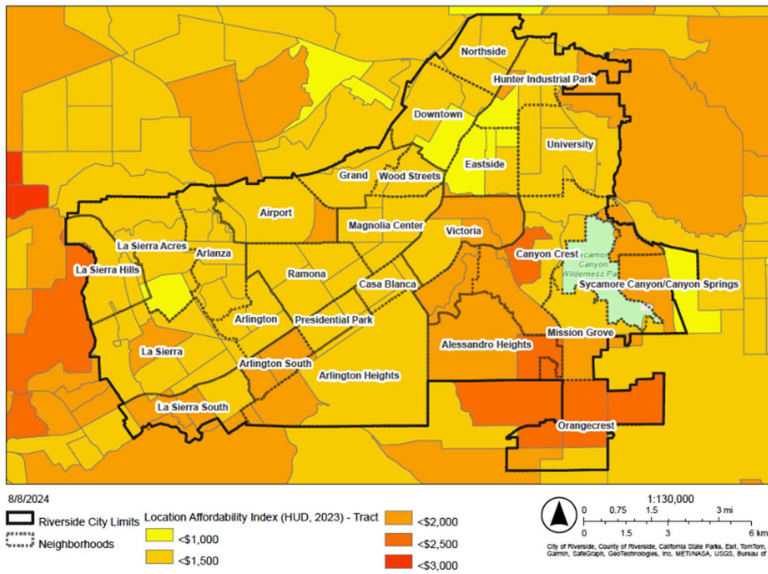


Figure 25: Median Gross Rents



### Licensed Community Care Facilities

Persons with special needs, such as the elderly and those with disabilities, must also have access to housing. Community care facilities provide a supportive housing environment to persons with special needs in a group environment. Restrictions that prevent this type of housing represent a fair housing concern.

According to the Community Care Licensing Division of the California Department of Social Services, as of July 2024, there were 199 State-licensed community care facilities with a total capacity of 3,225 beds/persons in Riverside (Table 64). Figure 26 shows that licensed care facilities are distributed throughout the City, with many close to the corridors with bus routes and near high quality transit stop areas.

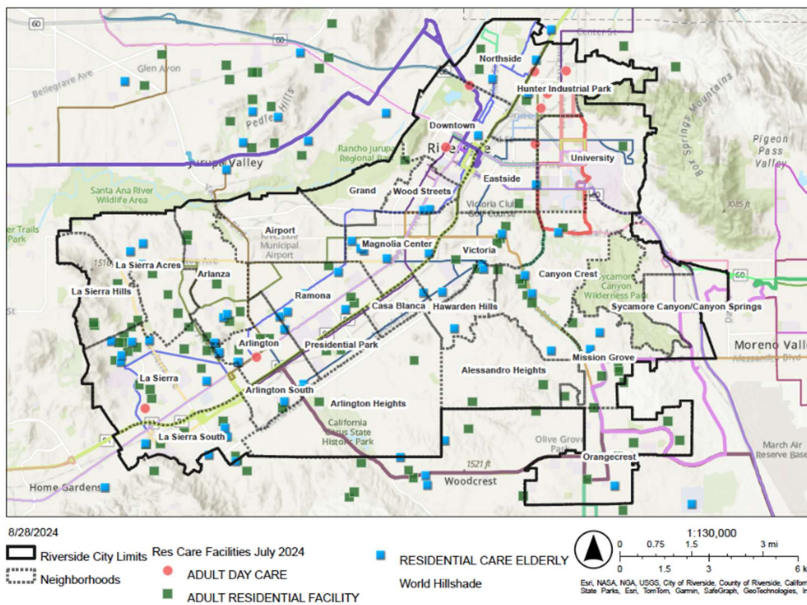
**Table 64: Licensed Community Residential Care Facilities by Type**

Type	Number of Facilities	Total Capacity
Adult Day Care	11	680
Adult Residential Facility*	109	644
Residential Care for the Elderly	79	1,901
Total	199	3,225

Source: State of California Department of Social Services, Community Care Licensing Division, July 2024.

Notes: \*Includes one (1) Social Rehabilitation Facility with a capacity for 16 persons.

**Figure 26: Licensed Care Facilities**



## Conclusions and Recommendations

In summary, the neighborhoods of North and West Riverside reveal a striking concentration of minorities, poverty, and segregation. Specifically, areas like Arlanza, Casa Blanca, and Eastside exhibit high levels of minority segregation, coupled with low moderate-income populations and elevated poverty rates. Moreover, these neighborhoods are characterized by a significant presence of Housing Choice Voucher (HCV) households and assisted housing units. Similarly, neighboring areas such as University and Hunter Industrial Park also reflect these patterns of high poverty and segregation. In contrast, South Riverside stands out as a racially concentrated area of affluence, with lower minority concentration and no assisted or HCV households.

These findings highlight the disparities in housing conditions and demographic composition across different regions of Riverside, emphasizing the critical need for targeted policies and interventions to address inequalities and promote inclusive community development.

### 7.3 Access to Opportunities

Significant disparities in access to opportunity are defined by the AFFH Final Rule as “substantial and measurable differences in access to educational, transportation, economic, and other opportunities in a community based on protected class related to housing.”

#### 1. TCAC Opportunity Maps

To assist in the assessment of fair housing, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (CTCAC) convened in 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% 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 65** 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 a racial location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County.

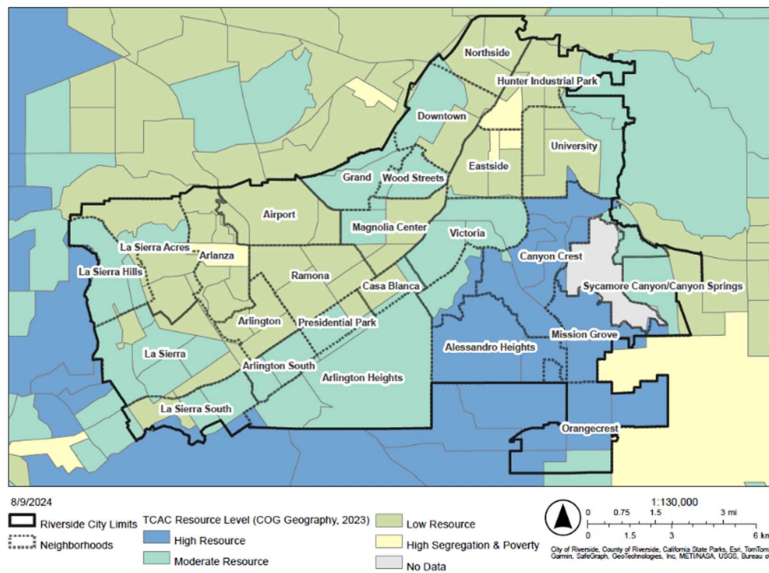


Table 65: Domains and List of Indicators for Opportunity Maps	
Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 4.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates

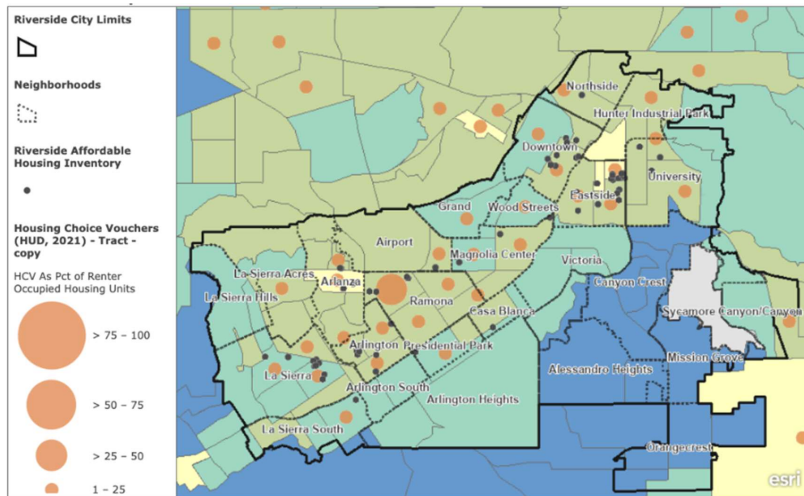
Source: California Fair Housing Task Force, Methodology for the 2023 TCAC/HCD Opportunity Maps, January 2023.

The 2023 TCAC/HCD opportunity map for Riverside identified High Resource areas in the southern parts of the city (in Canyon Crest, Alessandro Heights, and Mission Grove) and Low Resource areas in west and north Riverside. As noted in the integration/segregation analysis in the earlier section, these neighborhoods with lower resources are also correlated with areas of minority concentration, low and moderate income population concentration, and segregated neighborhoods. There is also a correlation between High Resource neighborhoods and neighborhoods with a low concentration of minorities and high White segregation. All RCAA tracts except for one are also High Resource. Another important note is absence of assisted housing or HCV households in High Resource tracts. The higher median rents in these areas tend to preclude the use of HCVs due to the limits of HUD payment standards.

**Figure 27: TCAC Resource Level Composite Scores**



**Figure 28: Affordable and Assisted Housing by TCAC Resource Level**



HUD has developed a series of indices for the purpose of fair housing assessment to help inform communities about disparities in access to opportunity. HUD-provided index scores are based on nationally available data sources and assess residents' access to key opportunity assets in Riverside. The data has not been updated since 2020 when the 2020 AI was last published. Nevertheless, the index scores will be evaluated alongside TCAC metrics in Education, Economic, and Environmental domains as part of this analysis to provide a current evaluation of access to these resources mirroring the approach taken in the 2021-2029 Housing Element AFFH analysis.

## 2. Education Domain

The "school proficiency index" developed by HUD uses school-level data on the performance of 4<sup>th</sup> grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. 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 indices, the school proficiency index scores were:

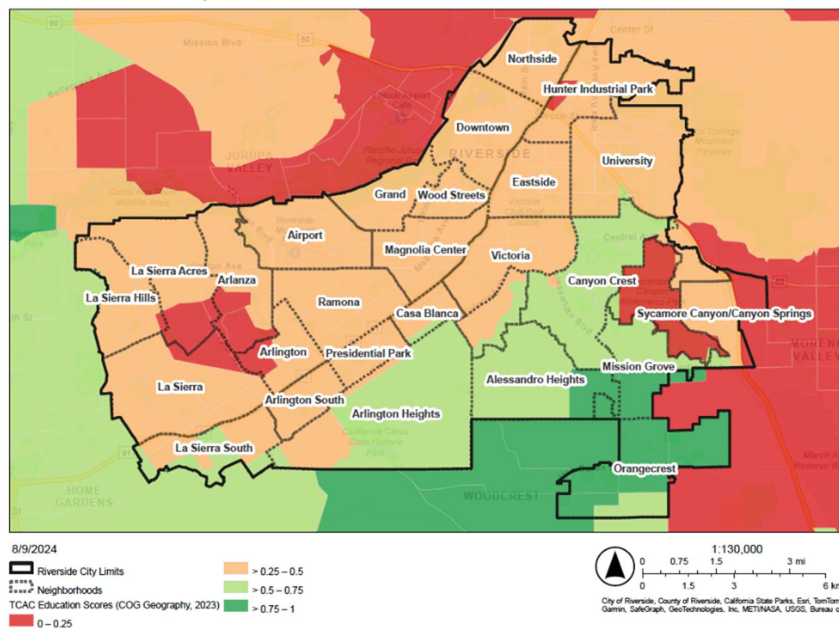
- White, Non-Hispanic: 37.51
- Black, Non-Hispanic: 33.23
- Asian or Pacific Islander, Non-Hispanic: 32.84
- Native American, Non-Hispanic: 32.71
- Hispanic: 30.27



These index scores indicate that non-White students had lower access to schools with high proficiency scores compared to White, non-Hispanic students. 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 access to opportunity for residents or, conversely, provide poor access to opportunity. Education scores are presented ranging from zero to one, with zero representing lower education outcomes and one representing positive education outcomes. In Riverside, there are clusters of areas that provide different ranges of access to better educational outcomes as **Figure 29** shows. In the western portion of the City there a number of Census tracts that have some of the least positive educational outcomes, especially within Arlanza, La Sierra, and Arlington. In other parts of the City, such as the southeast, there are tracts with higher educational outcomes which coincide with the RCAAs (**Figure 22**) and high white segregation areas (**Figure 18**). By contrast, the lower-scoring census tracts are also predominantly Hispanic (**Figure 17**) and have higher concentrations of poverty (**Figure 20**). It should be noted that the low score tract Sycamore Canyon is the Sycamore Canyon Wilderness Park that has no housing or population.

**Figure 29: TCAC Education Opportunity Scores**



Kidsdata.org reported that in 2021, 68.1 percent of students in Riverside County were 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), 71.9 percent of students are considered high-need, while in Alvord Unified School District, which serves the western half of the City, 78 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.

### 3. Economic Domain

The “labor market engagement index” provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.

According to the 2020 indices, labor market engagement index scores were:

- White, Non-Hispanic: 41.37
- Black, Non-Hispanic: 33.67
- Asian or Pacific Islander, Non-Hispanic: 34.40
- Native American, Non-Hispanic: 31.02
- Hispanic: 27.00

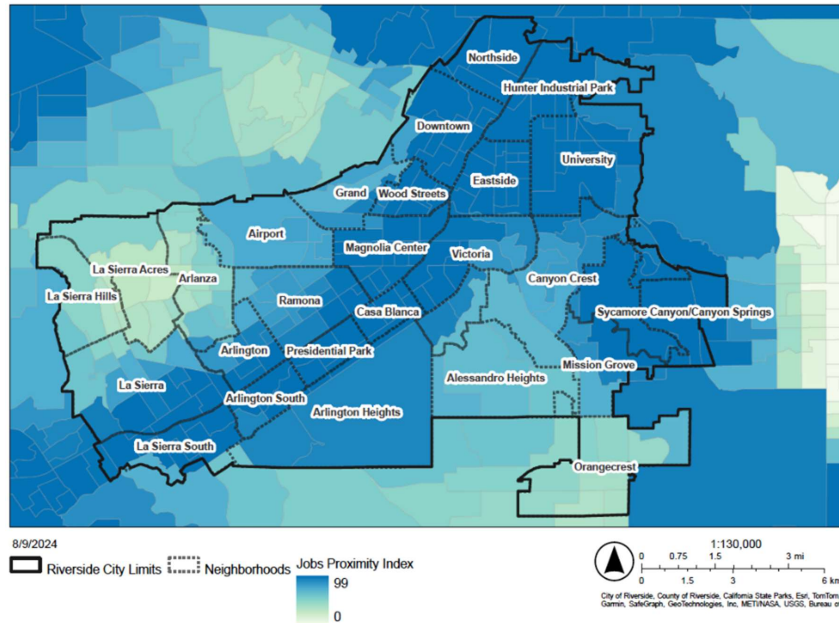
These index scores indicate a large gap in labor market engagement and human capital between White and non-White residents. Moreover, Hispanic residents had the lowest labor market engagement index, more than 15 points below White, non-Hispanic residents.

In addition, HUD calculates a jobs proximity index, which quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood. In 2020, the jobs proximity indices were as follows:

- White, Non-Hispanic: 70.56
- Black, Non-Hispanic: 74.69
- Asian or Pacific Islander, Non-Hispanic: 73.97
- Native American, Non-Hispanic: 71.47
- Hispanic: 70.16

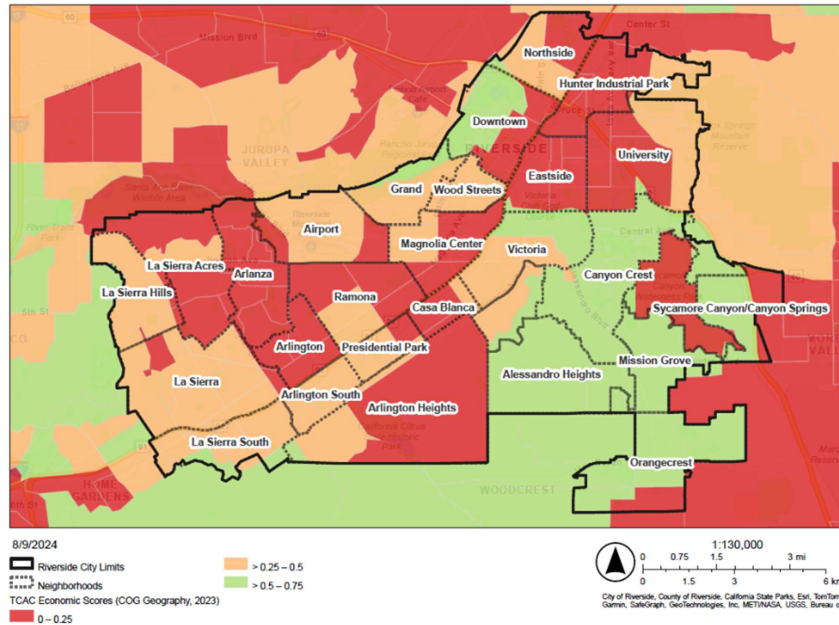
In the case of jobs proximity, Black and Asian/Pacific Islander, non-Hispanic residents had slightly better access to employment opportunities. As shown in **Figure 30**, jobs proximity index scores are highest along Magnolia Avenue and State Route 91 and decrease as distance from these corridors increases.

Figure 30: Jobs Proximity Index



As described in **Table 65**, the TCAC/HCD opportunity scoring system take into account poverty, adult education, employment, job proximity, and median home value to calculate an economic domain score between 0 and 1, where one is more positive economic outcomes. **Figure 31** shows a more comprehensive picture of the distribution of economic opportunity. Economic opportunity is lowest along the same corridors that have the highest jobs proximity index and vice versa. Western, southwestern, and northern neighborhoods have the lowest economic scores, while southern neighborhoods (Alessandro Heights, Canyon Crest, Mission Grove, and Sycamore Canyon/Canyon Springs) have the highest access to economic opportunity.

**Figure 31: TCAC Economic Domain Scores**



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 Inland Empire. One of these AJCCs is located in Hunter Industrial Park. In addition, the Rubidoux Youth Opportunity Center located near northern riverside is an affiliate American Job Center that provides a career resource room, internet access, personal computers and rooms where employers can interview job seekers.

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.

#### 4. Environmental Domain

HUD's "environmental health index" summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood. The 2020 environmental health index values were:

- White, Non-Hispanic: 24.25
- Black, Non-Hispanic: 23.18
- Asian or Pacific Islander, Non-Hispanic: 24.62
- Native American, Non-Hispanic: 22.23
- Hispanic: 22.04

These index values indicate poor environmental quality overall for all races, though White and Asian/Pacific Islander, non-Hispanic residents had slightly higher scores. TCAC/HCD's environmental domain scores use the CalEnviroScreen 4.0 pollution Indicators and values, the CalEnviroScreen tool was developed by the California Office of Environmental Health Hazard Assessment (OEHHA) to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviroScreen). Lower 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 low scoring census tracts as **Figure 32** shows. The highest scoring census tracts are in the eastern portion of the City, in Alessandro Heights, Canyon Crest, Mission Grove, Orange Crest, and parts of Victoria. The areas with lower scores do affect minority populations and areas of high percentage of non-white residents.

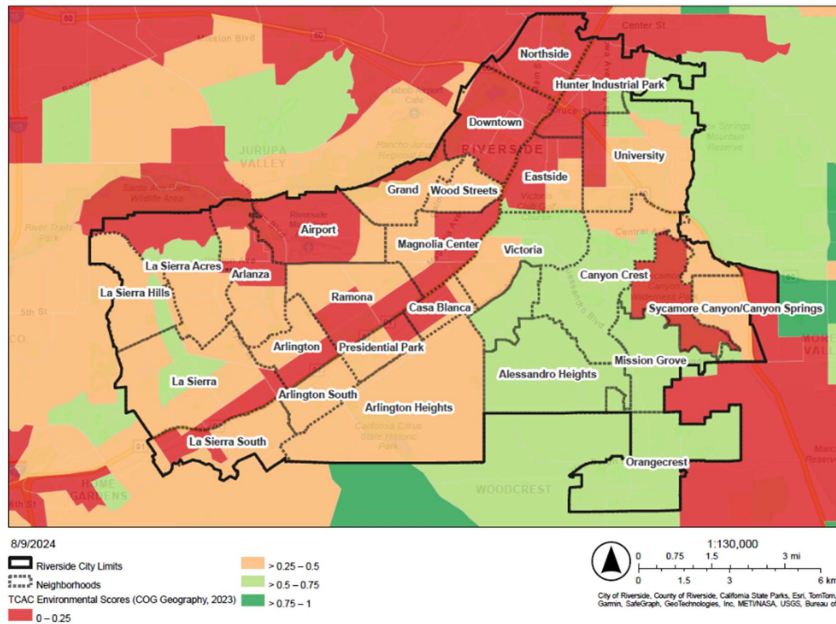
According to the American Lung Association (ALA) 2023 State of the Air Report, both San Bernardino and Riverside counties score an F in the Ozone Grade.<sup>20</sup> An F grade means that the county had nine more days than average of high air pollution levels. Overall, the Inland Empire has an Ozone Grade of F because of the number of unhealthy air quality days and the risk populations take from the pollutants present. 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.

In the Inland Empire, communities are most being affected by the burden of online shopping with the increase of diesel trucks and freight lines continue. San Bernardino County has the Country's worst ozone pollution and affects special needs groups in this area and the surrounding region the most. Also, communities with high percentages of minority populations are the most affected as the majority of the County's new warehouses neighbor minority concentrated areas according to a California Air Resource Board study done in 2019.

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<sup>20</sup> [American Lung Association, 2023 State of the Air Report.](#)

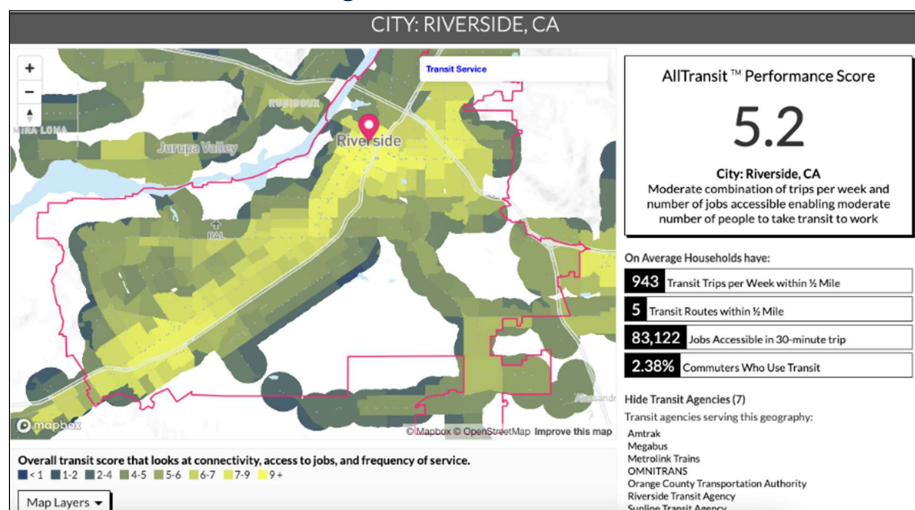
Figure 32: TCAC Environmental Score



## 5. Transit Access

AllTransit, 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 AllTransit, 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.

**Figure 33: AllTransit Scores**

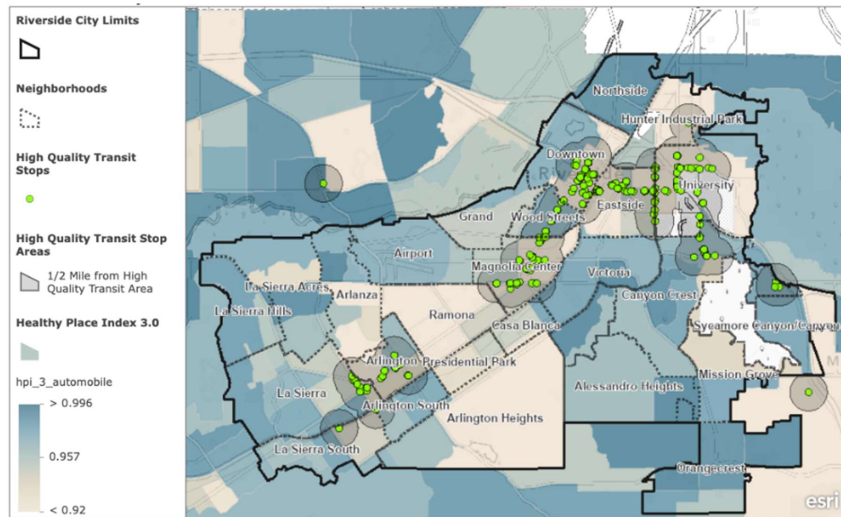


**Figure 34** shows the high quality transit stops and areas (one-half mile buffer around estimated high quality transit stops) provided by HCD's AFFH mapping tool. The map also shows the percentage households with automobile access as provided by California's Healthy Places Index (HPI) tool.<sup>21</sup> High quality transit areas are located in western and northern Riverside, with a gap along Ramona, Casa Blanca, Presidential Park, and Arlington Heights, where automobile access is relatively lower and there are higher concentrations of poverty and minorities. However, these HQTA are connected as shown by the high transit scores (6-9) in **Figure 33**.

<sup>21</sup> The Healthy Place Index (HPI) was developed to assess and prioritize community health needs across the state. It was created by the nonprofit Public Health Alliance of Southern California in collaboration with the Advancement Project California and community partners. The automobile access indicator evaluates the availability of private vehicles as a means of transportation.



**Figure 34: High Quality Transit Stops and Automobile Access**



## Conclusions and Recommendations

There are significant disparities in resource access across Riverside, with western and northern neighborhoods experiencing lower resources, higher concentrations of minorities and poverty, while there is higher resource availability in southeastern Riverside, particularly in areas designated as RCAAs. This divide is mirrored in education outcomes, which show higher achievement levels exclusively in southeastern neighborhoods. Despite the presence of numerous jobs along Magnolia Ave and State Route 91, economic outcomes in these areas are notably low. Transit access is generally adequate, with transit services concentrated along these corridors. Similarly, environmental outcomes are less favorable in western and northern neighborhoods compared to their southeastern counterparts, where environmental scores are consistently higher. To address the disparities in Riverside the City will need to implement placed-based strategies to improve these neighborhoods.

### 7.4 Disproportionate Need

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 geographic area” (24 C.F.R. §5.152). The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing. Other disproportionate needs include gentrification, displacement, and disadvantaged communities.



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

As shown **Table 66**, a higher percent of Black (47.0 percent), Asian (47.4 percent), and Hispanic (51.4 percent) households experience housing problems compared to American Indian (30.5 percent), White (33.8 percent), and all City households (43.5 percent). Renter-households, independent of race, experience housing problems at higher rates than owner-occupied households (58.6 percent and 31.1 percent, respectively).

Table 66: Housing Problem by Tenure and Race							
With Housing Problem	White	Black	Asian	American Indian	Pacific Islander	Hispanic	All
Owner-Occupied	23.8%	32.1%	38.4%	29.2%	0.0%	38.5%	31.1%
Renter-Occupied	52.0%	55.1%	100.0%	31.6%	100.0%	63.6%	58.6%
All Households	33.8%	47.0%	47.4%	30.5%	7.7%	51.4%	43.5%

Source: HUD CHAS, 2016-2020.

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 67** shows that renter elderly and large households experience housing problems at greater rates than all households in the City. In general, renters experience housing problems at a greater rate than owners.

Table 67: Housing Problems – Special Needs Populations							
With Housing Problem	Renter Households			Owner Households			All HH
	Elderly	Large HH (5+ persons)	All Renter	Elderly	Large HH	All Owners	
Riverside	64.1%	72.8%	58.6%	29.8%	42.6%	31.1%	43.5%

Source: HUD CHAS, 2016-2020.

## 1. Cost Burden

A household is considered cost burdened if it spends more than 30 percent of its income in housing costs, including utilities. About 38 percent of households in the City experience housing cost burdens. Similar to any housing problem trends shown in **Table 66**, Black, Asian, and Hispanic households experience cost burdens at higher rates than White households and all households combined (**Table 68**). Also, renters, regardless of race, experience cost burdens at higher rates than owners. Riverside renter elderly and large households experience cost burdens at much higher rates than renters (**Table 69**). About 60 percent of elderly renters and 46 percent of renter large households in the City experience cost burdens.

Table 68: Cost Burdens by Race							
Cost Burden	White	Black	Asian	American Indian	Pacific Islander	Hispanic	All HH
Owner-Occupied	22.7%	31.4%	35.3%	26.9%	0.0%	28.9%	26.7%
Renter-Occupied	47.8%	52.9%	53.8%	31.6%	100.0%	51.9%	50.9%
All Households	31.7%	45.4%	43.1%	29.5%	7.7%	40.7%	37.6%

Source: HUD CHAS, 2016-2020.

Table 69: Cost Burdens – Special Needs Populations							
Cost Burden	Renter Households			Owner Households			All HH
	Elderly	Large HH (5+ persons)	All Renter	Elderly	Large HH	All Owners	
Riverside	59.6%	45.9%	50.9%	29.7%	21.8%	26.7%	37.6%

Source: HUD CHAS, 2016-2020.

Affordability could be a barrier to housing for persons with disabilities or special needs populations who rely on Supplemental Security Income (SSI) as their primary source of income. 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-households experiencing cost burdens are located in the western and northern census tracts within the City. Over 40 percent of renter households in most tracts in these areas experience housing cost burdens. These census tracts also have high minority concentrations (especially Hispanic, **Figure 17**) and households living in poverty (**Figure 20**).

In contrast, owner households burdened by costs are distributed more widely across the City, with the highest concentration found in tracts located in northern neighborhoods such as Hunter Industrial Park and University, where over 60 percent of households experience cost burdens.

Figure 35: Cost Burden by Renters

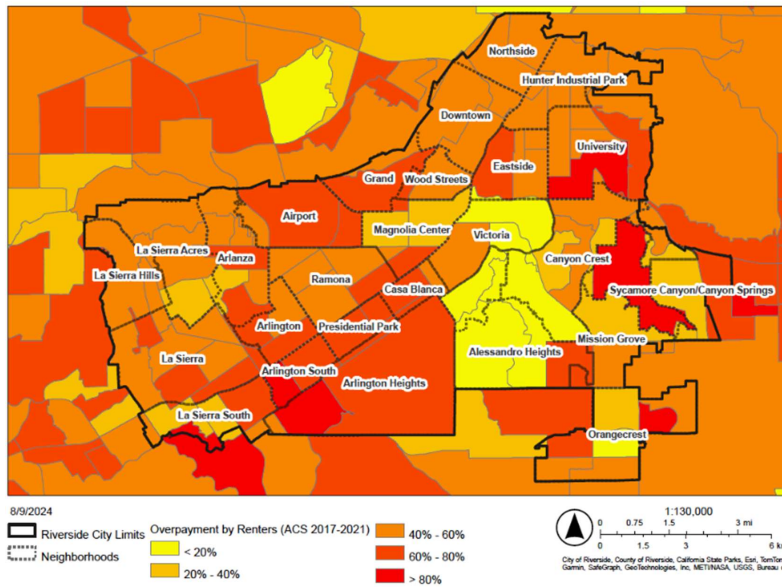
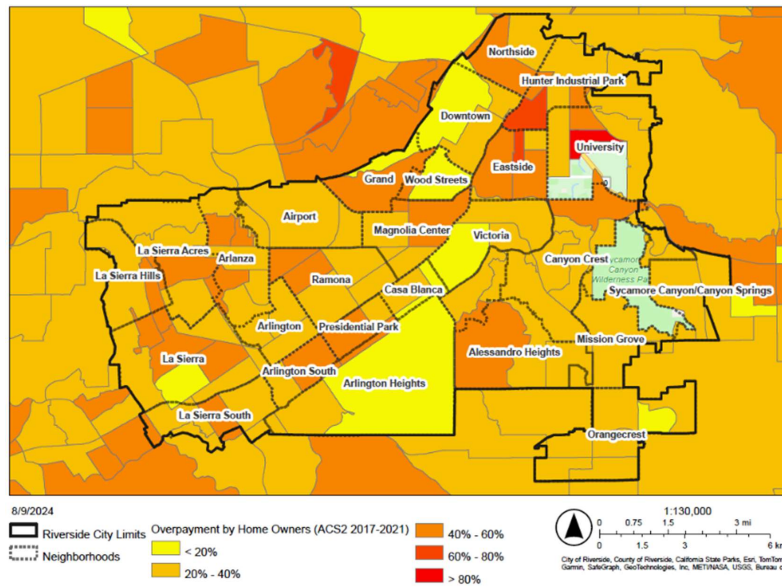


Figure 36: Cost Burden by Home Owners



## 2. 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 2022 five-year ACS estimates, about 10 percent of households in the City experience overcrowding conditions. Census tracts with overcrowded households are concentrated in the north and north west of the City (Arlanza, La Sierra neighborhoods, and Eastside, Hunter Industrial Park, and University) that are also areas of higher concentrations of racial/ethnic minorities, families with children, female-headed households with children, and LMI households, and neighborhoods in the north identified as RECAPs (**Figure 37**).

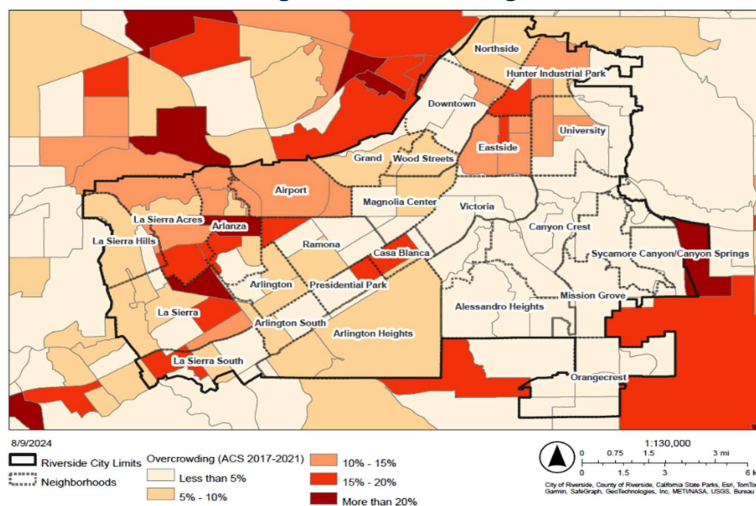
Of the 9,225 households experiencing overcrowded conditions, 35 percent were in owner-occupied households, and 65 percent were renters. This suggests that renters are disproportionately affected by overcrowding – as of 2022, only 45 percent of the households in Riverside were renter-occupied, but they represent 65 percent of all overcrowded households. In addition, more than 62 percent of occupied housing units in the City had three or more bedrooms (the minimum size considered large enough to avoid most overcrowding issues for households with five or more persons), but only 23 percent of these units were occupied by renters. This pattern suggests an inadequate supply of larger rental units.

**Table 70: Overcrowding in Riverside**

Tenure	Overcrowded Households <sup>1</sup>	Severely Overcrowded Households <sup>2</sup>	% Overcrowded Households	% of All Households <sup>3</sup>
Owner	3,220	675	34.9%	6.4%
Renter	6,005	2,065	65.1%	14.9%
Total	9,225	2,740	100.0%	10.2%

Notes: 1) Overcrowding 1.01 or more persons per bedroom. 2) Severe overcrowding 1.51 or more persons per bedroom. 3) % of households for that category.  
Source: American Community Survey 2018-2022 (5-Year Estimates)

**Figure 37: Overcrowding**



### 3. Substandard Conditions

Examining the age of the current housing stock is one way to understand how historical development patterns have contributed to the City's built form. The time during which the largest share of Riverside's housing units was built is 1970-1979, and approximately 76 percent of the City's housing stock was constructed prior to 1990. This is consistent with trends seen in the SCAG region, where more units were built during 1970-1979 than any other period.

Housing that is 30 years old or older, like most of the housing in Riverside, is assumed to require some rehabilitation. Features such as electrical capacity, kitchen features, and roofs usually need updating if no prior replacement work has occurred. As seen in **Figure 38**, over 75 percent of housing units in most tracts in the City are more than 30 years old. Tracts with the lower concentration of housing over 30 years old are located in eastern parts of the City (Sycamore/Canyon Springs, Mission Grove, and Orange Crest). However, the need for rehabilitation does not necessarily make a housing unit substandard.

The ACS estimates that about one percent of homes in Riverside are in substandard condition currently – including one percent (1,011 units) lacking complete kitchen facilities and about 0.3 percent (327 units) lacking plumbing. **Figure 39** and **Figure 40** show that substandard housing units are concentrated in Ramona, Arlington, Hunter Industrial Park, and University neighborhoods.

**Figure 38: Units Over 30 Years Old**

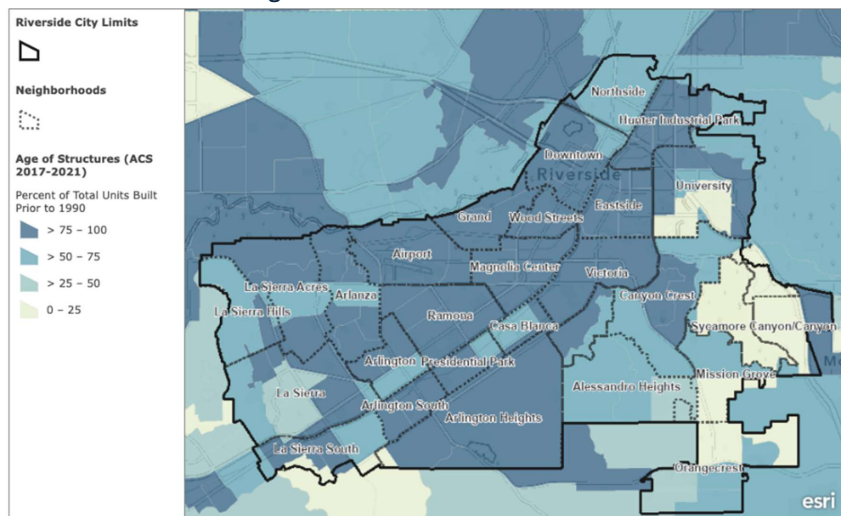


Figure 39: Units Lacking Complete Plumbing

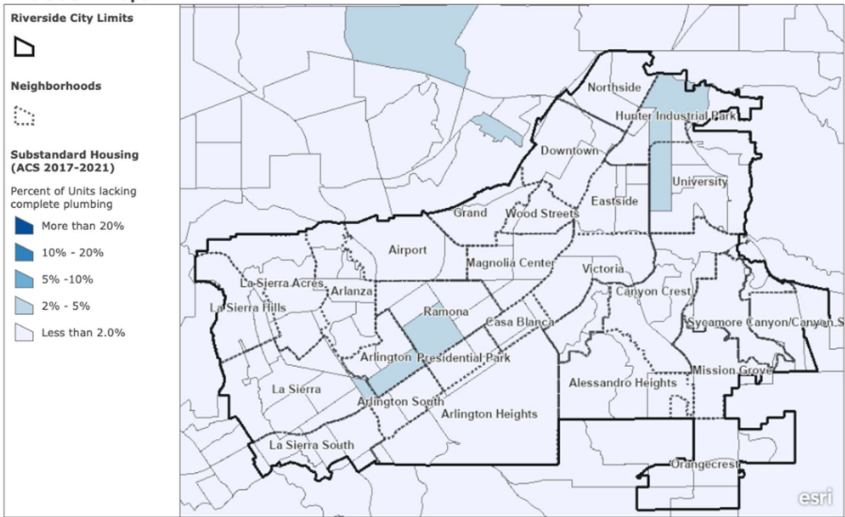
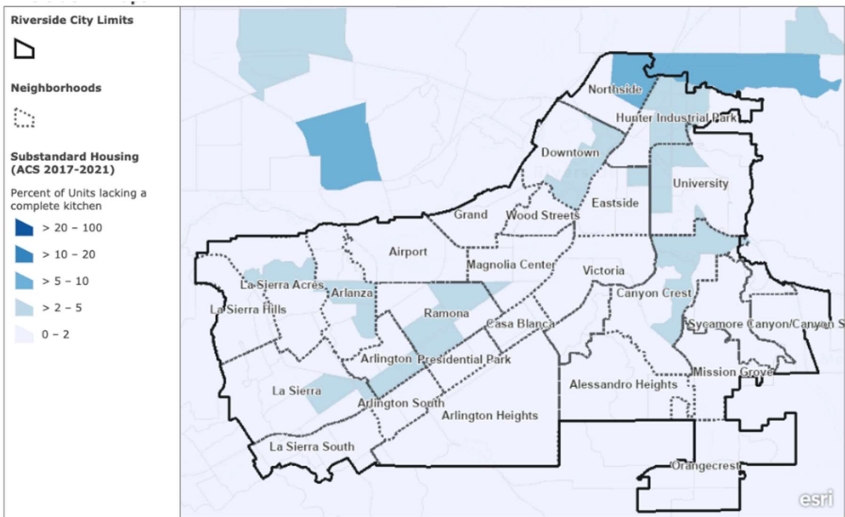


Figure 40: Units Lacking a Complete Kitchen



#### 4. Displacement

For the AFFH in the Housing Element, 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:

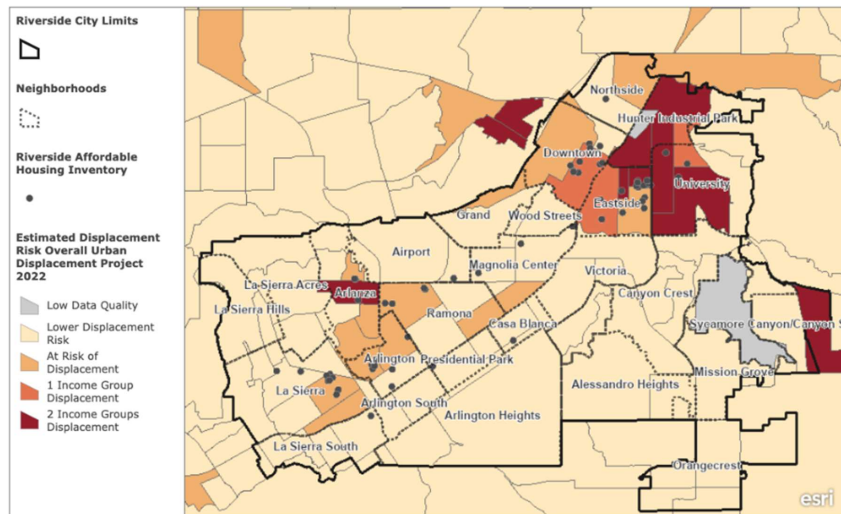
- The share of very low-income residents is above 20%; and
- The tract meets two of the following criteria:
  - Share of renters is above 40%;
  - Share of people of color is above 50%;
  - Share of very low-income households (50% AMI or below) that are severely rent burdened households is above the 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, a number of census tracts are identified as vulnerable communities. These communities are generally concentrated in Arlanza and Arlington in western Riverside and in northern Riverside in Downtown, Eastside, Hunter Industrial Park, and University neighborhoods (**Figure 41**). 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 20<sup>th</sup> 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.



**Figure 41: Displacement Risk**



As described in Section 7.2-6 Assisted Housing Developments, existing housing that receives governmental assistance is often a significant source of affordable housing in many communities. Riverside has 63 affordable housing developments, ranging in size from 1 to 268 housing units. Many of these are located in tracts vulnerable to displacement (**Figure 41**). To help combat displacement of residents and preserve affordability the City may be able to acquire and rehabilitate these units. Apartment projects often need rehabilitation, and the property owner may have insufficient funds to complete periodic repairs and renovations. In these situations, the City may find it advantageous to work with the property owner and offer a flexible number of financial incentives (e.g., low-interest loans, renegotiating current loan packages, cash incentives) in return for extending the length of the affordability covenants on the affordable units.

Rehabilitation and preservation costs depend on numerous factors, most notably the condition of the property, the amount of deferred maintenance, the financial viability of the project, and the length of the affordability term. The City of Riverside, working in conjunction with nonprofit and for-profit partners, has completed several major acquisition and rehabilitation projects that provide a basis for making a magnitude-of-order estimate of the future cost of such activities.

In the latter parts of the 20<sup>th</sup> 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-20<sup>th</sup> and early-21<sup>st</sup> century



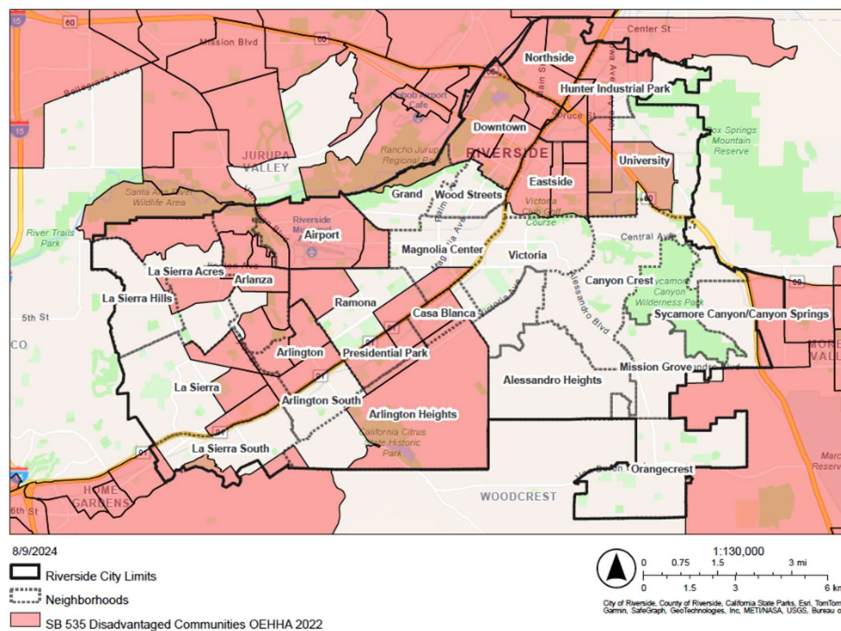
characterization of Riverside and surrounding Inland Empire cities as “bedroom” communities for a labor force largely tied to the coast, despite their long histories as independent economic centers of the Inland region.

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

## 5. Disadvantaged Communities

California Senate Bill 535 (SB 535) was enacted in 2012. This bill amended the California Global Warming Solutions Act of 2006 and introduced changes related to the allocation of funds from the Greenhouse Gas Reduction Fund. Specifically, SB 535 mandated that a minimum of 25 percent of the funds generated from the Greenhouse Gas Reduction Fund be allocated to projects that benefit disadvantaged communities, and that at least 10 percent of those funds be spent directly within those communities. The bill aimed to ensure that these communities, which are often disproportionately affected by environmental issues, receive direct benefits and support from California's efforts to reduce greenhouse gas emissions. These communities are identified and prioritized using the Disadvantaged Communities Map (Figure 42). In Riverside, disadvantaged communities are located in western and northern neighborhoods of the City.

**Figure 42: SB 535 Disadvantaged Communities**



## Conclusions and Recommendations

Renters face higher rates of housing problems compared to homeowners (59 percent and 39 percent, respectively), with elderly renters disproportionately affected (64 percent). These challenges – cost burden, overcrowded households, substandard housing, and the risk of displacement – are concentrated in western and northern Riverside. These areas also exhibit high concentrations of minorities, poverty, and R/ECAPs in northern Riverside, along with a prevalence of single female-headed households. Communities such as Arlanza, Arlington, Ramona in the west, and Downtown, Eastside, University, and Hunter Industrial Park in the east, stand out as areas with significant needs as they are designated as low resource or areas of High Poverty and Segregation.

To uplift these neighborhoods in Riverside, the City should focus on place-based strategies to encourage community revitalization, including preservation of existing affordable housing and rehabilitation of existing structures. Financial assistance programs can also alleviate cost burdens. The City should also provide more affordable housing opportunities within these neighborhoods as well as in areas of higher resources and enhancing mobility strategies to promote inclusion.

## 8. Fair Housing Progress Report

The 2020 Riverside AI Fair Housing Action Plan identified several fair housing impediments in Riverside and outlined actions the City would take remove or mitigate the identified impediments. This section reviews the City's progress in implementing these actions. The evaluation also assesses the appropriateness of the impediments, categorizing them as follows:

- a) Conditions and impediment are no longer relevant;
- b) Impediment has been fully mitigated;
- c) Impediment remains inadequately addressed;
- d) Impediment has become more concerning; and
- e) Impediment previously misidentified as fair housing issues.

The Action Plan also outlined actions to affirmatively further fair housing (AFFH). These actions were not related to a specific impediment but are which contribute to eliminating housing discrimination and segregation; foster inclusive neighborhoods; provide housing for disabled persons, a protected class; and otherwise create positive impacts and change by promoting fair housing. Progress in implementing these actions and their continued appropriateness is also evaluated.

**Table 71: Progress in Implementing Actions to Remove/Mitigate Fair Housing Impediments**

Private Sector Impediments			
Impediment	Actions	Accomplishments	Appropriateness
<b>Housing Discrimination</b>			
Housing discrimination, particularly on the basis of disability, race, and familial status, is an impediment to fair housing choice. Based on past trends, at least 40 housing discrimination complaints may be filed by Riverside residents with HUD during the five year period between FY 2020-2021 and FY 2024-2025. During the same period, it is estimated that at least 500 housing discrimination complaints may be filed with the FHCRRC.	<ul style="list-style-type: none"> <li>During the five-year period from FY 2020-2021 through FY 2024-2025, the City will have the FHCRRC provide fair housing services which will include the processing of housing discrimination complaints and landlord/tenant FHCRRC worked in cooperation with the Community Access Center and the Blindness Support Center and obtained a MOU to collaborate in addressing disability related fair housing issues. The FHCRRC does not partner with the Inland Regional Center but does have an MOU with the Arc of Riverside County to support developmentally disabled persons. This included conducting presentations and distributing literature.</li> </ul>	<p>Accomplished. Between FY 2019 to FY 2024, 292 housing discrimination complaints were made with the FHCRRC by Riverside residents. Almost 20,000 landlord/tenant complaints were received by the FHCRRC.</p>	C) Impediment remains inadequately addressed.
<b>Steering</b>			
Although steering cannot be precisely quantified, there is evidence that it exists and, therefore, it does create an impediment to fair housing choice.	<ul style="list-style-type: none"> <li>During the five-year period from FY 2020-2021 through FY 2024-2025, the FHCRRC will provide 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.</li> <li>During the five-year period from FY 2020-2021 through FY 2024-2025, the FHCRRC will provide information on how to detect steering behavior by resident property managers to renters attending workshops and Town Hall meetings.</li> <li>In FY 2020-2021, the FHCRRC will add a “steering” category to the categories of alleged housing discriminatory acts.</li> </ul>	<p>Accomplished. Steering is identified by the FHCRRC as a practice that leads to discriminatory outcomes by limiting housing options based on protected characteristics. Both First Time Homebuyer (FTHB) workshops and fair housing training sessions for resident property managers address and highlight the definition of steering and how to detect steering behavior.</p>	C) Impediment remains inadequately addressed.

Table 71: Progress in Implementing Actions to Remove/Mitigate Fair Housing Impediments			
Impediment	Actions	Accomplishments	Appropriateness
<b>Lending Practices</b>  The City's goal is to improve the loan approval rates of all racial and ethnic populations that want to buy a home located in Riverside. Excessive debt to income ratios impede fair housing choice because borrowers cannot qualify to buy a home in a neighborhood they like. Many of these borrowers should not apply for a loan until after they have their debts under control.  Evidence of a potential fair housing impediment is the fact that in 2018 a low percentage of Black borrowers applied for a loan to buy a home in Riverside. Additionally, black borrowers experienced above average loan denial rates.	<ul style="list-style-type: none"><li>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.</li><li>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.</li></ul>	Partially accomplished. The FHCRC covers debt-to-income ratios in FTHB workshops and by using the interactive budget when completing one-on-one pre-purchase counseling.  The HMDA software used to produce reports to track and monitor lenders was not covered under any grant program the FHCRC has; therefore, disparities in loan denial rates were not tracked.  The FHCRC collaborates annually with IVAR. IVAR members also have access to the Annual Housing Conference.	C) Impediment remains inadequately addressed.
<b>Property Management Practices</b>  The housing discrimination complaints filed with HUD's San Francisco Office demonstrate that discriminatory property management practices exist in Riverside and, therefore, constitute an impediment to fair housing choice.	<ul style="list-style-type: none"><li>In FY 2020-2021, the FHCRC will explore the potential to create Riverside City Apartment Association.</li><li>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.</li><li>In FY 2021-2022, the FHCRC will prepare model written property management policies that it will transmit to property management firms.</li></ul>	Partially accomplished. The FHCRC works with the Orange County Apartment Association and the Southern California Rental Association which operate in Riverside County. The establishment of a new Apartment Association was not achieved and would require additional funding.  Property managers were consulted on fair housing laws and requirement under the preparation of the 2020 AI. The FHCRC conducts surveys related to housing discrimination allegations and produces a Fair Housing Audit Report for the City of Riverside annually.	C) Impediment remains inadequately addressed.

Table 71: Progress in Implementing Actions to Remove/Mitigate Fair Housing Impediments			
Impediment	Actions	Accomplishments	Appropriateness
<b>Land Use and Zoning</b> The City's current land use and zoning policies do not adequately define or support transitional, supportive, and affordable senior housing and are an impediment to fair housing.	The following actions will be carried forward to the FY 2020/21-FY 2024/2025 AI time period: <ul style="list-style-type: none"> <li>Define transitional and supportive housing by referencing the definitions in Government Code Sections 65582(f) and (g).</li> <li>Prepare a brochure and additional information promoting the Reasonable Accommodation Procedure.</li> <li>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.</li> <li>Amend the Zoning Code to define <i>affordable</i> senior housing as being restricted to residents 62 years of age or older.</li> </ul> The Zoning Code also needs to be amended to address the requirements of laws enacted in 2018. AB 2162 requires supportive housing to be a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, if the proposed housing development meets specified criteria, and requires a local government to approve, within specified periods, a supportive housing development that complies with these requirements.	The FHCRC provides materials on best practices related to fair housing and distributes materials on various topics such as Fair Housing Pitfalls, Dos and Don'ts of Fair Housing, and HUD/DOJ joint statements.	
		Partially accomplished. Riverside's Zoning Code defines transitional and supportive housing in accordance with State law. The City's current Code is complaint AB 2162 that supportive housing to be a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, the Zoning Code needs to be amended to ensure that parking requirements for supportive housing are complaint with AB 2162 (no minimum parking requirements if development is within ½ mile of a public transit stop).  Reasonable Accommodation Procedure packets are available to tenants. As of September 2024, brochures are under development to be included in each tenant application.  Riverside Housing Development Corporation property management staff obtains annual certification by FHCRC to ensure management of policies and practices at Housing Authority owned housing developments affirmatively further fair housing.  Zoning code does not define affordable senior housing.	C) Impediment remains inadequately addressed.

Table 72: Progress in Implementing Actions to Affirmatively Further Fair Housing			
Action	Action	Accomplishment	Appropriateness
<b>Private Sector</b>			
<b>Population Diversity</b>			
Although the City as whole has a low segregation level, there are neighborhoods with concentrations of minority populations. Some of these neighborhoods also experience poverty rates considerably higher than the citywide average. The issues of population diversity, residential integration/segregation, and access to opportunity will be explored in greater detail during the preparation of the <i>Assessment to Fair Housing (AFH)</i> section of the <i>2021-2029 Housing Element</i> .	In FY 2020-2021, the City will evaluate the contribution that the following actions could make toward reducing minority population concentrations and poverty: <ul style="list-style-type: none"> <li>Place-based strategies in the neighborhoods with minority population concentrations and high poverty rates.</li> <li>Development of affordable family apartment housing in high opportunity neighborhoods</li> <li>Development of market rate housing in neighborhoods with minority population concentrations.</li> </ul>	Accomplished. The City completed an AFH as part of the 2021-2029 Housing Element Update and developed AFFH meaningful actions to address issues. The meaningful actions address fair housing services and outreach and enforcement; housing mobility, place-based strategy to encourage community revitalization; new housing choices in areas of high opportunity; Housing for Persons with Disabilities; protection existing residents from displacement; community health strategies; and environmental equity strategies.	Meaningful actions will continue to be implemented per the City's 2021-2029 Housing Element Action Plan.
<b>Brokerage Services</b>			
Based on the available information it was determined that membership of minority populations in real estate organizations is not impeded by laws, rules, or policies.	Although no impediment was found to exist, to affirmatively further fair housing: In FY 2020-2021 to FY 2024-2025, the FHCRC will – <ul style="list-style-type: none"> <li>Participate in the meetings of IVAR's Housing Committee.</li> <li>Offer to teach the 3-hour Fair Housing course that REALTORS and salespersons must complete when they renew their license every four years.</li> </ul>	Accomplished. FHCRC is participating in IVAR's Housing Committee trainings. The most recent IVAR training was held in July 2024. A FHCRC representative also attends IVAR's monthly breakfast meetings to speak about fair housing. FHCRC offered a 3-hour Fair Housing Certification Training labeled Fair Housing 101 as well as Advanced Fair Housing Training 102.	C) Impediment remains inadequately addressed
<b>Appraisal Practices</b>			
Complaints regarding discriminatory appraisal practices are not routinely collected by local, State or Federal agencies. Data are unavailable to demonstrate if discriminatory appraisal	Although no impediment was found to exist, to affirmatively further fair housing – <ul style="list-style-type: none"> <li>In FY 2020-2021 to FY 2024 2025, the FHCRC will describe the appraisal process and the contents of an</li> </ul>	Accomplished. The FTHB workshop discussion, conducted by the FHCRC, includes the appraisal process and the contents of an appraisal report.	A) Conditions and impediments are no longer relevant. Although no impediment was

Table 72: Progress in Implementing Actions to Affirmatively Further Fair Housing			
Action	Action	Accomplishment	Appropriateness
practices adversely impact some of Riverside real estate transactions.	appraisal report at the First Time Homebuyer workshops.		identified, the FHCRC will continue to educate the public regarding the appraisal process at the FTHB workshops.
<b>Lending Practices</b>			
In 2018, Hispanic purchased homes in resource-rich neighborhoods to a far less degree than Non-Hispanic White buyers. The factors impeding Hispanics to buy homes in resource-rich neighborhoods are probably manifold.	<p>To affirmatively further fair housing –</p> <ul style="list-style-type: none"> <li>In FY 2020-2021 to FY 2024-2025, the FHCRC will describe how to use the internet in the neighborhood-home search process and how to identify the neighborhood types at the First Time Homebuyer workshops.</li> <li>Annually, the City will support the efforts of the FHCRC to secure funding for outreach to minority communities through HUD's Fair Housing Initiatives Program (FHIP).</li> </ul>	Partially accomplished. The FTHB participants are given information on the home search process. In coordination with the FHCRC, City staff presented the Down-Payment Assistance Program for low-income, first-time homebuyers at the FTHB workshops. The program was also presented at various locations in the City.	C) Impediment remains inadequately addressed.
<b>Homeowners Insurance</b>			
Data are unavailable that demonstrates if the availability and cost of homeowners insurance are impediments to fair housing choice.	<p>To affirmatively further fair housing –</p> <ul style="list-style-type: none"> <li>In FY 2020-2021 to FY 2024-2025, the FHCRC will describe "CLUE Reports" as part of its discussion on homeowners insurance at the FTHB workshops.</li> </ul>	Accomplished. The FTHB workshops provide an overview of homeowner insurance and this includes the CLUE Report.	B) Impediment has been fully mitigated.
<b>Hate Crimes</b>			
The number of hate crimes occurring at residences has declined dramatically to two a year. Therefore, an impediment to fair housing choice does not exist at this time.	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.	Accomplished. Between 2018 and 2022, 70 hate crimes have been reported in the City. Most hate crimes committed were based on race or ethnicity. The number of hate crimes committed annually has slightly increased during this period.	D) Impediment has become more concerning.
<b>Public Sector</b>			



Table 72: Progress in Implementing Actions to Affirmatively Further Fair Housing			
Action	Action	Accomplishment	Appropriateness
<p><b>Residential Land Use</b></p> <p>Because the City provides for a variety of housing opportunities for disabled persons, no impediments were found to exist regarding the City's planning and zoning policies, practices, and regulations.</p> <p>The competition for low income housing tax credits is keen. Family projects proposed on sites located in census tracts designated as Highest Resource and High Resource are awarded site amenity and bonus points.</p>	<p>To affirmatively further fair housing, the City will continue to implement the following policies which are included in the adopted 2014-2021 <i>Housing Element</i>:</p> <p><b>Housing for People with Disabilities.</b> Increase the supply of permanent, affordable, and accessible housing suited to the needs of persons with disabilities; provide assistance to persons with disabilities to maintain and improve their homes.</p> <p><b>Supportive Services.</b> Continue to fund the provision of supportive services for persons with special needs to further the greatest level of independence and equal housing opportunities.</p> <p>To affirmatively further fair housing, the City will conduct a robust sites inventory to identify sites in the Highest and High Resource Neighborhoods that are already zoned or suitable to be rezoned to a multifamily zoning designation.</p>	<p>Accomplished. The City has supported the needs for a variety of housing opportunities for persons with disabilities and special needs populations through its Consolidated Plan activities.</p> <ul style="list-style-type: none"> <li>Between FY 2020 and FY 2023, the City placed or continued to assist 270 formerly homeless individuals who obtained housing through the Tenant-Based Rental Assistance Program and funded the development of 202 affordable housing units using HOME funds. In addition, 2,527 persons received overnight shelter during the year and 46 individuals received rental assistance and case management through the Rapid-Rehousing Program using ESG funds.</li> <li>During the same time period, 1,047 eligible households received Housing Subsidy Assistance, 1,273 eligible households received Supportive Services, and 402 households received Housing Information Services using HOPWA funds.</li> </ul> <p>The City conducted a sites inventory analysis as part of the Sixth Cycle Housing Element update and identified suitable sites for its RHNA units.</p>	<p>C) Impediment remains inadequately addressed.</p> <p>While the actions identified in the 2020 AI have been accomplished, additional impediments related to planning and zoning policies have been identified as part of the City's Housing Element update and specific actions have been identified to mitigate the impediments.</p>
<p><b>Assessment of Fair Housing</b></p> <p>The Housing Element Update which will cover the 2021-2029 period will need to include an Assessment of Fair Housing (AFH). State guidelines describing what must be contained in AFH have not been released. However, an analysis may be required of a broad range of potential public sector impediments.</p>	<p>Pursuant to State law and to affirmatively further fair housing, the City will prepare an Assessment of Fair Housing by October 2021.</p>	<p>Accomplished. The City completed an AFH as part of the 2021-2029 Housing Element Update and developed AFFH meaningful actions to address issues. The meaningful actions address fair housing services and outreach and enforcement; housing mobility, place-based strategy to encourage community revitalization; new housing choices in areas of high opportunity; Housing for Persons with Disabilities; protection existing residents from</p>	<p>B) Impediment has been fully mitigated.</p> <p>The City will continue to comply with State AFH requirements to identify potential impediments.</p>

Table 72: Progress in Implementing Actions to Affirmatively Further Fair Housing			
Action	Action	Accomplishment	Appropriateness
		displacement; community health strategies; and environmental equity strategies.	
Demographics of Publicly Supported Housing			
<p>The demographics of individual developments have evolved since the projects were built and may change in the future when turnover occurs. Vacant units probably occur infrequently, however. For example, Victoria Heights is the only LIHTC development that advertises rent units in the Press Enterprise.</p> <p>With respect to the occupancy of all LIHTC developments, the Black population occupies this affordable housing in a proportion greater than they represent of the City's population. One of the objectives of the HOME Program and other federal housing programs is to promote fair housing by ensuring outreach to all potential eligible households, especially those least likely to apply for housing assistance. Affirmative marketing consists of actions to provide information and otherwise attract eligible persons to available housing without regard to race, color, national origin, sex, religion, familial status or disability.</p>	<p>To affirmatively further fair housing –</p> <ul style="list-style-type: none"> <li>In FY 2020-2021, the FHCRG work with the on-site property managers of LIHTC rental housing developments to develop and adopt affirmative marketing procedures.</li> </ul>	<p>Accomplished. When requested, the FHCRG periodically developed and adopted affirmative marketing procedures with housing providers. FHCRG was active in the development of the affirmative marketing procedures of the Mission Heritage Plaza property.</p>	<p>b) Impediment has been fully mitigated</p>

## 9. Fair Housing Action Plan

The 2021-2029 City of Riverside Housing Element contains a series of meaningful actions to affirmatively further fair housing (AFFH). The Housing Element AFFH meaningful actions are incorporated into this AI report as Appendix B. Also, based on the assessment conducted in previous sections, the City will pursue additional actions to address fair housing issues identified.


**Table 73: Fair Housing Actions (2025-2030)**

Private Sector	
Housing Discrimination	Actions to Remove/Mitigate Impediments
Housing discrimination, particularly on the basis of disability, race, and familial status, is an impediment to fair housing choice.	<ul style="list-style-type: none"> <li>Continue to utilize FHCRC to 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.</li> <li>Continue outreach and education activities, and community partnerships to promote fair housing practices.</li> <li>Continue to offer workshops and seminars to property managers and renters.</li> <li>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</li> <li>FHCRC will update model written property management policies that it will transmit to property management firms.</li> </ul>
Lending Practices	Actions to Remove/Mitigate Impediments
The City's goal is to improve the loan approval rates of all racial and ethnic populations that want to buy a home located in Riverside.	<ul style="list-style-type: none"> <li>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.</li> </ul>
Land Use and Zoning	Actions to Remove/Mitigate Impediments
The following Zoning Code amendments are recommended:	<ul style="list-style-type: none"> <li>Group Homes/Residential Care Facilities: Review and develop mitigating strategies to eliminate barriers for large group homes in restrictive Zoning districts (RA-5 and RC).</li> <li>Permanent Supportive Housing: A zoning code amendment is necessary to clarify that parking is not required for supportive housing developments within one-half mile of a public transit stop.</li> <li>Employee and Farmworker Housing: The Zoning Code currently does not address the requirements of the Employee Housing Act. Changes to the Zoning Code will allow the City to implement the State requirements.</li> </ul>
Hate Crimes	Actions to AFFH
The number of hate crimes occurring at residences has been fairly consistent over the last five years, with race/ethnicity/ancestry, religion, and sexual orientation being the primary bases of hate.	<ul style="list-style-type: none"> <li>FHCRC will collaborate with local universities and schools to ensure vulnerable communities are informed about their rights and have access to resources to support their housing needs.</li> <li>FHCRC will educate residents to recognize and report hate incidents promptly as part of their fair housing workshops.</li> </ul>

## Appendix A: Public Outreach

This appendix provides documentation of outreach activities conducted.

### Stakeholder Meetings

**CITY OF RIVERSIDE**

## 2025-2030 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING VIRTUAL STAKEHOLDER MEETINGS

The City of Riverside is currently preparing its 2025-2030 Analysis of Impediments to Fair Housing Choice to identify barriers to fair housing. Your feedback will play a key role in helping the City develop a Fair Housing Action Plan for the next five years to effectively address these challenges.

The City will be hosting TWO virtual meetings.  
Attend the one that best suits your schedule!

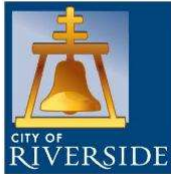
<b>Monday, October 7, 2024</b> <b>11AM-12:30PM</b>	<b>Wednesday, October 9, 2024</b> <b>11AM-12:30PM</b>
---	--

**Zoom Meeting ID: 980 450 7823**  
**Telephone: +1 669 900 6833**  
**Link: <https://us02web.zoom.us/j/9804507823>**

**SHARE YOUR AGENCY'S EXPERTISE TO ENSURE  
FAIR HOUSING FOR ALL!**

**FOR ADDITIONAL INFORMATION, PLEASE MICHELLE GUZMAN AT:  
[FEDGRANTS@RIVERSIDECAL.GOV](mailto:FEDGRANTS@RIVERSIDECAL.GOV)**

## CITY OF RIVERSIDE



### 2025-2030 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

## VIRTUAL STAKEHOLDER MEETINGS

The City of Riverside is updating its Analysis of Impediments to Fair Housing Choice and wants to hear from you. The City will be hosting TWO virtual meetings. Attend the one that best suits your schedule!

**MONDAY, OCTOBER 7, 2024**

**11 AM- 12:30 PM**

-OR-

**WEDNESDAY, OCTOBER 9, 2024**

**11 AM- 12:30 PM**

**SHARE YOUR AGENCY'S EXPERTISE TO PROMOTE FAIR HOUSING FOR ALL!**

Telephone: +1 669 900 6833

Link: <https://us02web.zoom.us/j/9804507823>

**MEETING ID: 980 450 7823**

For more information, contact Michelle Guzman at: [fedgrants@riversideca.gov](mailto:fedgrants@riversideca.gov)

## CITY OF RIVERSIDE



### 2025-2030 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

## VIRTUAL STAKEHOLDER MEETINGS

The City of Riverside is updating its Analysis of Impediments to Fair Housing Choice and wants to hear from you. The City will be hosting TWO virtual meetings. Attend the one that best suits your schedule!

**MONDAY, OCTOBER 7, 2024**

**11 AM- 12:30 PM**

-OR-

**WEDNESDAY, OCTOBER 9, 2024**

**11 AM- 12:30 PM**

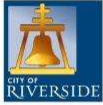
**SHARE YOUR AGENCY'S EXPERTISE TO PROMOTE FAIR HOUSING FOR ALL!**

Telephone: +1 669 900 6833

Link: <https://us02web.zoom.us/j/9804507823>

**MEETING ID: 980 450 7823**

For more information, contact Michelle Guzman at: [fedgrants@riversideca.gov](mailto:fedgrants@riversideca.gov)



City of Riverside  
Housing and Human Services Department  
3900 Main St.  
Riverside, CA 92522

## **Join the conversation on Fair Housing!**

**MONDAY, OCTOBER 7**  
-OR-  
**WEDNESDAY, OCTOBER 9**



City of Riverside  
Housing and Human Services Department  
3900 Main St.  
Riverside, CA 92522

## **Join the conversation on Fair Housing!**

**MONDAY, OCTOBER 7**  
-OR-  
**WEDNESDAY, OCTOBER 9**

Arlington Temporary Assistance  
Attn: Ofelia Ortega  
P.O. Box 70136  
Riverside, CA 92513

Assistance League of Riverside  
Attn: Nancy Franks  
3707 Sunnyside Dr.  
Riverside, CA 92506

Big Brothers Big Sisters of the Inland  
Empire  
Attn: Marina Uriarte  
2155 Chicago Ave Suite 100  
Riverside, CA 92507

Care Connexus  
Attn: Jose Chavez  
4130 Adams St STE B  
Riverside, CA 92504

Catholic Charities  
Attn: Agustin Avantes  
1450 North D Street  
San Bernardino, CA 92405

Girls on the Run  
Attn: Molly Widdicombe  
PO Box 21044  
Riverside, CA 92516

Healthy Leaders Thriving Cities  
Attn: Lynn Heatley  
5455 Inspiration Dr.  
Riverside, CA 92506

Fair Housing Council of Riverside Co.  
Inc.  
Attn: Rose Mayes  
33 Mission Inn Avenue Suite 100  
Riverside, CA 92501

Inland Empire Latino Lawyers  
Association  
Attn: Gabriela Perez  
2060 University Ave #113  
Riverside, CA 92507

Inspire Life Skills Training, Inc.  
Attn: Kristi Perez  
815 W 6th St #160  
Corona, CA 92882

Janet Goeske Foundation  
Attn: Danielle Nelson  
5257 Sierra St  
Riverside, CA 92504

Junior League of Riverside  
Attn: Mandy Hyde  
1860 Chicago Ave  
Riverside, CA 92507

Mercy House  
Attn: Allison Davenport  
P.O. Box 1905  
Santa Ana, CA 92702

Operation SafeHouse - Emergency  
Shelter  
Attn: Norma Biegel  
9685 Hayes St  
Riverside, CA 92503

Rebirth Homes  
Attn: Debbie Martis  
P.O. Box 2291  
Riverside, CA 92516-2291

Riverside Area Rape Crisis Center  
Attn: Adriane Lamar Snider  
1845 Chicago Ave STE A  
Riverside, CA 92507

SAFE Family Justice Centers  
Attn: Molly Soliman  
3900 Orange St.  
Riverside, CA 92501

Transgender Health and Wellness  
Center  
Attn: Thomi Clinton  
340 S. Farell Drive Suite A208, Palm  
Springs, CA 92262

Voices for Children  
Attn: Jessica Muñoz, Esq., MFS  
P.O. Box 7219  
Riverside, CA 92513

Path of Life Ministries  
Attn: Chris Oberg  
2840 Hulen Pl  
Riverside, CA 92507

The Access Center  
Attn: Leonard Jarman  
6848 Magnolia Ave STE 150  
Riverside, CA 92506

Riverside County Housing Authority  
Attn: Juan Garcia  
P.O. Box 1445  
Riverside, CA 92502

Inland Regional Centers  
500 Iowa Avenue, Suite 100  
Riverside, CA 92507

California School of the Deaf-  
Riverside  
3044 Horace Street  
Riverside, CA 92506

California Apartment Association  
Attn: Victor Cao  
980 Ninth Street, Suite 1430  
Sacramento, CA 95814

Apartment Association of Greater  
Inland Empire  
10630 Town Center Drive, Suite 116  
Rancho Cucamonga, CA 91730

California Newspaper Publishers  
Association  
Attn: Brittney Barsotti  
PO Box 162291  
Sacramento, CA 95816  
Housing Authority of the City of  
Riverside  
Attn: Michelle Davis  
3900 Main Street  
Riverside, CA 92522



**CITY OF RIVERSIDE**

## 2025-2030 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING TAKE OUR FAIR HOUSING SURVEY!

The City of Riverside is currently preparing its 2025-2030 Analysis of Impediments to Fair Housing Choice (AI). Your feedback will play a key role in helping the City develop a Fair Housing Action Plan for the next five years to address these challenges. Share your experiences to help us identify barriers to fair housing and develop effective solutions.

Scan the QR code below with your phone camera to take our online survey:



**SURVEY IS AVAILABLE IN ENGLISH AND SPANISH**  
(click the top right corner of webpage to choose language)



**FOR ADDITIONAL INFORMATION, PLEASE CONTACT MICHELLE GUZMAN AT:  
FEDGRANTS@RIVERSIDEC.A.GOV**



## 2025-2030 ANÁLISIS DE OBSTÁCULOS A LA VIVIENDA JUSTA ¡RESPONDA NUESTRA ENCUESTA SOBRE VIVIENDA JUSTA!

La Ciudad de Riverside está preparando su Análisis de Obstáculos a la Vivienda Justa (AI) para el período 2025-2030. Sus comentarios son clave para ayudar a la Ciudad a desarrollar un Plan de Acción de Vivienda Justa para los próximos cinco años que aborde estos desafíos. Comparta sus experiencias para ayudarnos a identificar barreras a la vivienda justa y desarrollar soluciones efectivas.

Escanee el código QR abajo con la cámara de su teléfono para tomar nuestra encuesta en línea:



### LA ENCUESTA ESTÁ DISPONIBLE EN INGLÉS Y ESPAÑOL

(haga clic en la esquina superior derecha de la página web para elegir el idioma)



**PARA INFORMACIÓN ADICIONAL, POR FAVOR, CONTACTE A  
MICHELLE GUZMAN EN: [FEDGRANTS@RIVERSIDEC.A.GOV](mailto:FEDGRANTS@RIVERSIDEC.A.GOV)**

Analysis of Impediments to Fair Housing/5- Year Consolidated Plan 2025-2030

As part of the CDBG program, the City is also required to address fair housing concerns. As part of this assessment, please provide input on your experience of fair housing issues in your neighborhood. The sole purpose of this survey is to gauge the overall experience of fair housing in the community so that the City can develop plan of actions to further fair housing.

Federal and State Fair Housing laws prohibit discrimination in all aspects of housing, including home sales, rentals, housing policies, and financing. Each resident is entitled to equal access to housing opportunities regardless of race, color, religion, sex, national origin, disability/medical conditions, familial status, marital status, age ancestry, sexual orientation, gender identity, gender expression, source of income, or any other arbitrary reason.

1. Please enter your ZIP Code:

2. Racial Categories (select one or more):

American Indian or Alaska Native

Native Hawaiian or Other Pacific Islander

Asian

White

Black or African American

Other (please specify)

3. Ethnic Categories (select one):

Hispanic or Latino

Non-Hispanic or Latino

4. Do you rent or own your home?

Rent

Own

5. Age

18-24

25-34

35-44

45-54

55-64

65+

6. Do you have a disability?

Yes

No

7. Do you have children under the age of 18 years old in your home?

Yes

No

8. Have you personally ever experienced discrimination in accessing housing?

Yes, please proceed to question 16.

No

9. Who do you believe discriminated against you? (check all that apply)

Landlord/Property Manager

Mortgage Lender

Real Estate Agent

Government Employee

Insurance Broker/Company

Other (please specify)

10. Where did the act of discrimination occur? (check all that apply)

Apartment Complex

Single-Family Neighborhood

Mobile Home Park

Condo/Townhome Development

Public or Subsidized Housing Project

When Applying for City/County Programs

Other (please specify)

11. On what basis do you believe you were discriminated against? (check all that apply)

Race

Gender

Color

Ancestry

Religion

Marital Status

National Origin

Sexual Orientation

Age

Family Status (e.g., single parent with children, family with children or expecting a child)

Source of Income (e.g., welfare, unemployment insurance)

Disability/Medical Conditions (either you or someone close to you)

Other (please specify)

12. How were you discriminated against? (check all that apply)

Not Shown Apartment

Higher Security Deposit than Industry Standard

Higher Rent than Advertised

Provided Different Housing Services or Facilities

Other (please specify)

13. Reasonable modification and reasonable accommodations allow for certain changes or flexibility in the rules, policies, or procedures set by housing providers. This allows a resident with a disability an equal opportunity to use and enjoy a housing unit. A reasonable modification is a structural change made to the premises, while a reasonable accommodation is a change, exception, or adjustment to a rule, policy, practice, or service. For example, installing a ramp for an individual who uses a wheelchair or grab bars in the bathroom are reasonable modifications. A reasonable accommodation would include making an exception to an existing 'no pet' rule to permit a service dog.

Have you ever been denied:

A "Reasonable Modification" (structural changes to unit)

A "Reasonable Accommodation" (flexibility in rules and policies)

N/A

14. If yes, what was your request?

15. If you believe you have been discriminated against, have you reported the incident?

Yes

No

16. If no, why?

Don't Know Where to Report

Afraid of Retaliation

Don't Believe it Makes Any Difference

Too Much Trouble

Other (please specify)

17. If yes, how did you report the incident?

18. If you reported the complaint, what is the status?

Unresolved

Unresolved/Pending Resolution

Resolved via Mediation

In Litigation

Other (please specify)

19. Have you ever attended a Fair Housing Training?

Yes

No

20. If yes, was it free or was there a fee?

Yes

Required a Fee

21. If yes, where was the training?

Home

Work

Other (please specify)

22. Have you ever seen or heard of a Fair Housing Public Service Announcement (PSA) on TV/Radio/Online/Flyer?

Yes

No

23. Please provide a short comment on fair housing and community development needs assessments.

#### **Análisis de Obstáculos a la Vivienda Justa / Plan Consolidado de 5 Años 2025-2030**

Como parte del programa CDBG, la Ciudad también está obligada a tratar las preocupaciones sobre vivienda justa. Como parte de esta evaluación, por favor proporcione información sobre su experiencia con problemas de vivienda justa en su vecindario. El único propósito de esta encuesta es evaluar la experiencia general de la vivienda justa en la comunidad para que la Ciudad pueda desarrollar un plan de acciones para promover la vivienda justa.

Las leyes federales y estatales sobre vivienda justa prohíben la discriminación en todos los aspectos de la vivienda, incluyendo la venta de viviendas, los alquileres, las políticas de vivienda y la financiación. Cada residente tiene derecho a igualdad de acceso a las oportunidades de vivienda, independientemente de su raza, color, religión, sexo, origen nacional, discapacidad/condiciones médicas, estado familiar, estado civil, edad, ascendencia, orientación sexual, identidad de género, expresión de género, fuente de ingresos o cualquier otro motivo arbitrario.

1. Por favor, ingrese su código postal:

2. Categorías raciales (seleccione una o más):

- Indio Americano o Nativo de Alaska
- Nativo de Hawái u Otro Isleño del Pacífico Asiático
- Blanco
- Negro o Afroamericano
- Otro (especifique)

3. Categorías étnicas (seleccione una):

- Hispano o Latín
- No hispano o latín

4. ¿Alquila o es dueño de su casa?

- Alquila
- Dueño de casa

5. Edad

- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65+

6. ¿Tiene alguna discapacidad?

- Si
- No

7. ¿Tiene hijos menores de 18 años en su hogar?

- Si
- No

8. ¿Alguna vez ha sufrido personalmente discriminación al tratar de acceder a una vivienda?

- Sí, continúe con la pregunta 16
- No

9. ¿Quién cree que lo discriminó? (marque todo lo que corresponda)

- Propietario(a)/Administrador(a) de propiedad
- Prestamista hipotecario
- Agente de Bienes Raíces
- Empleado(a) del gobierno
- Agente/Compañía de seguros
- Otro (especifique)

10. ¿Dónde ocurrió el acto de discriminación? (marque todo lo que corresponda)

- Edificio de apartamentos
- Vecindario de casas Unifamiliares
- Parque de casas móviles
- Condominio/desarrollo de casas adosadas
- Proyecto de viviendas públicas o subsidiadas
- Al solicitar programas de la ciudad/condado
- Otro (especifique)

11. ¿Sobre qué base cree que fue discriminado? (marque todo lo que corresponda)

- Raza
- Género
- Color
- Ascendencia
- Religión
- Estado civil
- Origen nacional
- Orientación sexual
- Edad
- Estado familiar (por ejemplo, padre/madre soltero(a) con hijos, familia con hijos o esperando un hijo)

- Fuente de ingresos (por ejemplo, asistencia social, seguro de desempleo)
- Discapacidad/condiciones médicas (ya sea usted o alguien cercano a usted)
- Otro (especifique)

12. ¿Cómo fue discriminado? (marque todo lo que corresponda)

- No se me mostró el apartamento
- Depósito de seguridad era más alto que el estándar de la industria
- Alquiler más alto que el anunciado
- Se me proporcionaron diferentes servicios o instalaciones de vivienda
- Otro (especifique)

13. Las modificaciones razonables y las acomodaciones razonables permiten ciertos cambios o flexibilidad en las reglas, políticas o procedimientos establecidos por los proveedores de vivienda. Esto permite a un residente con una discapacidad tener una oportunidad igual de usar y disfrutar de una unidad de vivienda. Una modificación razonable es un cambio estructural a las instalaciones, mientras que una acomodación razonable es un cambio, excepción o ajuste a una regla, política, práctica o servicio. Por ejemplo, instalar una rampa para una persona que usa una silla de ruedas o barras de agarre en el baño es una modificación razonable. Una acomodación razonable incluiría hacer una excepción a una regla existente de "no mascotas" para permitir un perro de servicio.

¿Alguna vez le han negado:

- Una "modificación razonable" (cambios estructurales en la unidad)
- Una "acomodación razonable" (flexibilidad en las reglas y políticas)
- No aplica

14. Si es así, ¿cuál fue su petición?

15. Si cree que ha sido discriminado, ¿ha denunciado el incidente?

- Sí
- No

16. Si no, ¿por qué no?

- No sabe dónde reportar
- Miedo a represalias
- No cree que haga ninguna diferencia
- Demasiado complicado
- Otro (especifique)

17. Si es así, ¿cómo denunció el incidente?

18. Si reportó la queja, ¿Qué ha pasado con la queja?



- Sin resolver
- Sin resolver/pendiente de resolución
- Resuelta mediante mediación
- En litigio
- Otro (especifique)

19. ¿Alguna vez ha asistido a una capacitación sobre vivienda justa?

- Si
- No

20. Si es así, ¿era gratis o había una tarifa?

- Si
- Requirió una tarifa

21. Si es así, ¿dónde fue la capacitación?

- En casa
- En el trabajo
- Otro (especifique)

22. ¿Alguna vez ha visto o escuchado un anuncio de servicio público (PSA) sobre vivienda justa en televisión/radio/en línea/folleto?

- Si
- No

23. Por favor, proporcione un breve comentario sobre las necesidades de vivienda justa y desarrollo comunitario.

## Appendix B: Riverside Action Plan- AFFH Meaningful Actions

Fair Housing Issues	Contributing Factors	Meaningful Actions	Action Description	Lead
Fair Housing Services Outreach and Enforcement	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	HE-3.2	3.2 Adopt a City-wide policy that supports continued collaboration and participation with fair housing service provider(s) that increases fair housing opportunities across the City. Ensure efforts are tailored to maximize efficacy in areas of racially and ethnically concentrated poverty	Housing Authority
		HE- 3.5	3.5 Study the need for a City-wide Universal Design and Visitability Policy.	Building & Safety Division
		HE-2.3	2.3 Prepare a Zoning Code update or series of updates to: • further facilitate development of emergency shelters (including parking requirements per AB 139), transitional housing, permanent supportive housing, residential care facilities, and community care facilities in appropriately zoned areas distributed throughout the City, especially in High and Highest Resource census tracts as identified by the TCAC Opportunity Mapping Tool; • allow low-barrier navigation centers as a by-right use in mixed-use and non -residential zones that permit housing; and • update the zoning provisions for emergency shelters to comply with SB-2; and • review and develop mitigating strategies to eliminate barriers for large group homes in restrictive Zoning districts (RA-5 and RC).	Planning Division
Housing Mobility	The availability of affordable units in a range of sizes (such as lack of family housing) Location and type of affordable housing Private discrimination	HE-3.3	3.3 Adopt a City-wide policy that encourages the development or adaptation of residential units and communities accessible to people with physical and sensory disabilities.	Housing Authority
		HE-3.4	3.4 Adopt a City-wide policy prioritizing wastewater and water services for affordable housing development applications in the event of service rationing.	Riverside Public Utilities

Fair Housing Issues	Contributing Factors	Meaningful Actions	Action Description	Lead
Place-Based Strategy to Encourage Community Revitalization	Lack of public investments in specific neighborhoods, including services or amenities Lack of private investments in specific neighborhoods	HE-5.4	5.4 Prepare a Zoning Code update to further encourage mixed-use development, including a potential density transfer program allowing densities on properties that are not built to their maximum density to be used on other properties, with transit access that reduces automobile trips, vehicle miles traveled, and associated energy consumption, with a particular focus on racially concentrated areas of affluence and census tracts with CalEnviroScreen Scores below the 60 <sup>th</sup> percentile.	Planning Division
		HE-6.4	6.4 Complete an evaluation and report of housing development every 5 years to ensure that adequate services and facilities, including water, wastewater, and neighborhood infrastructure are available, including recommendations for prioritization of capital improvements in lower opportunity census tracts.	Planning Division
		HE-1.5	1.5 Develop and implement a plan to seek additional funding for the City's Housing Rehabilitation Program for lower income owners to encourage further homeowner investment, address issues of overcrowding, and ensure housing stability. Where possible, target this program to census tracts with overcrowded conditions in over 20% of households.	Housing Authority
		HE-4.1	4.1 Prepare urban design standards that promote the integration of private development and public space and create safe, healthy, complete neighborhoods with quality housing development, services and commercial uses, schools, transit, parks, childcare, and other needs. Explore means to incentivize enhanced public realm improvements and quality design in chronically underinvested neighborhoods and lower-scoring census tracts on TCAC Opportunity Maps.	Planning Division
		HE-6.3	6.3 Develop and maintain an up-to-date residential sites inventory and provide to interested developers with information on available housing development opportunities and incentives on a quarterly basis. Prioritize publicizing specific opportunities for affordable housing development in High and Higher Opportunity tracts as well as those tracts with median incomes higher than the Area Median Income.	Planning Division

Fair Housing Issues	Contributing Factors	Meaningful Actions	Action Description	Lead
		HE-EJ 7.1	7.1 Conduct an inventory of existing housing within environmental justice communities to determine the adequacy and condition of existing housing.	Planning Division
		HE-EJ 7.2	7.2 On properties where poor-quality housing conditions are identified in environmental justice communities, facilitate the permitting process for property owners and residents to remedy and retrofit unhealthy and unsafe conditions in a timely fashion. If warranted, pilot this program in census tracts with elevated levels of household overcrowding and substandard housing conditions.	Planning Division
		HE-EJ 7.5	7.5 Prepare an infill development ordinance and development regulations, including the potential to use pre-approved construction plans, to facilitate housing on smaller lots that are close to needed services and amenities while allowing lot consolidation without discretionary review and with fee reductions. Consider prioritization of development opportunity sites located in census tracts with TCAC Economic Opportunity Scores over 0.50.	Planning Division
		HE-EJ 8.1	8.1 Streamline development approvals for opening full-service grocery stores, with particular emphasis on increasing food access in census tracts with CalEnviroScreen scores above the 75th percentile.	Planning Division
		HE-EJ 8.2	8.2 Work with retail businesses in environmental justice communities such as local convenience stores and farmers' markets to increase the availability of fresh produce.	Planning Division
New Housing Choices in Areas of High Opportunity	Lack of public investments in specific neighborhoods, including services or amenities Lack of private investments in specific neighborhoods	HE-EJ 8.5	8.5 Facilitate transformation of vacant lots within environmental justice communities into community garden sites.	Planning Division
		HE-1.1	1.1 Prepare an Inclusionary Housing Program to facilitate the integration of affordable housing units throughout the City's housing supply. If warranted, pilot this program in High and Highest Resource census tracts based on TCAC Opportunity Mapping tool.	Housing Authority
		HE-5.1	5.1 Develop an Accessory Dwelling Unit (ADU) program that includes pre-approved construction plans, streamlined permitting, and educational materials to facilitate ADU development, including promoting the grants available to homeowners through the California	Planning Division

Fair Housing Issues	Contributing Factors	Meaningful Actions	Action Description	Lead
Housing for Persons with Disabilities			Housing Finance Agency (CalHFA). Target outreach efforts in neighborhoods with over 40% of housing overpayment among renter households to help improve affordability.	
		HE-5.2	5.2 Prepare a Zoning Code update to streamline the approval process and develop written procedures for application processing, in adherence with SB 35, and simplify development regulations for new housing development including affordable and mixed-income development in High and Highest Opportunity census tracts per TCAC Opportunity Maps.	Planning Division
		HE-EJ 7.1	7.1 Conduct an inventory of existing housing within environmental justice communities to determine the adequacy and condition of existing housing.	Planning Division
		HE-EJ 7.2	7.2 On properties where poor-quality housing conditions are identified in environmental justice communities, facilitate the permitting process for property owners and residents to remedy and retrofit unhealthy and unsafe conditions in a timely fashion. If warranted, pilot this program in census tracts with elevated levels of household overcrowding and substandard housing conditions.	Planning Division
	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	HE-3.3	3.3 Adopt a City-wide policy that encourages the development or adaptation of residential units and communities accessible to people with physical and sensory disabilities.	Housing Authority

Fair Housing Issues	Contributing Factors	Meaningful Actions	Action Description	Lead
	<p>Lack of assistance for housing accessibility modifications</p> <p>Lack of assistance for transitioning from institutional settings to integrated housing</p>			
Protecting Existing Residents from Displacement	<p>The availability of affordable units in a range of sizes (such as lack of family housing)</p> <p>Displacement of residents due to economic pressures</p> <p>Land use and zoning laws</p> <p>Community opposition</p>	HE-3.1	3.1 Adopt a City-wide policy that prohibits discrimination in the sale or rental of housing regarding characteristics protected under State and Federal fair housing laws.	Housing Authority
		HE-5.3	5.3 Prepare an Adaptive Reuse Ordinance to encourage redevelopment of underutilized commercial and industrial properties and allow by-right residential development in exchange for providing a certain number of affordable units in non-residential zones. Consider piloting this program, if warranted, in census tracts considered vulnerable to displacement risk with substantial concentrations of commercial uses.	Planning Division
Community Health Strategies	<p>Access to equitable childcare</p> <p>Access to equitable healthcare</p> <p>The availability, type, frequency, and reliability of public transportation</p> <p>Lack of private investments in specific neighborhoods</p> <p>Lack of public investments in specific neighborhoods, including services or amenities</p> <p>Location and type of affordable housing</p> <p>Private discrimination</p>	HE-1.5	1.5 Develop and implement a plan to seek additional funding for the City's Housing Rehabilitation Program for lower income owners to encourage further homeowner investment, address issues of overcrowding, and ensure housing stability. Where possible, target this program to census tracts with overcrowded conditions in over 20% of households.	Housing Authority
		HE-4.1	4.1 Prepare urban design standards that promote the integration of private development and public space and create safe, healthy, complete neighborhoods with quality housing development, services and commercial uses, schools, transit, parks, childcare, and other needs. Explore means to incentivize enhanced public realm improvements and quality design in chronically underinvested neighborhoods and lower-scoring census tracts on TCAC Opportunity Maps	Planning Division

Fair Housing Issues	Contributing Factors	Meaningful Actions	Action Description	Lead
Environmental Equity Strategies	Lack of public improvements Concentration of Environmental Hazards due to Industrial Uses Lack of basic services and inclusion in food deserts	HE-6.3	6.3 Develop and maintain an up-to-date residential sites inventory and provide to interested developers with information on available housing development opportunities and incentives on a quarterly basis. Prioritize publicizing specific opportunities for affordable housing development in High and Higher Opportunity tracts as well as those tracts with median incomes higher than the Area Median Income.	Planning Division
		HE-EJ 7.1	7.1 Conduct an inventory of existing housing within environmental justice communities to determine the adequacy and condition of existing housing.	
		HE-EJ 7.2	7.2 On properties where poor-quality housing conditions are identified in environmental justice communities, facilitate the permitting process for property owners and residents to remedy and retrofit unhealthy and unsafe conditions in a timely fashion. If warranted, pilot this program in census tracts with elevated levels of household overcrowding and substandard housing conditions.	Planning Division
		HE-EJ 8.1	8.1 Streamline development approvals for opening full service grocery stores, with particular emphasis on increasing food access in census tracts with CalEnviroScreen scores above the 75 <sup>th</sup> percentile.	Planning Division
		HE-EJ 8.2	8.2 Work with retail businesses in environmental justice communities such as local convenience stores and farmers' markets to increase the availability of fresh produce.	Planning Division
		HE-EJ 8.1	8.1 Streamline development approvals for opening full service grocery stores, with particular emphasis on increasing food access in census tracts with CalEnviroScreen scores above the 75 <sup>th</sup> percentile.	Planning Division
		HE-EJ 8.2	8.2 Work with retail businesses in environmental justice communities such as local convenience stores and farmers' markets to increase the availability of fresh produce	Housing Authority