## **City of Perris**

# Analysis of Impediments to Fair Housing Choice

City of Perris 101 North D Street Perris, CA 92570

May 2019



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## I. Introduction

Equal access to housing is fundamental to each person in meeting essential needs and pursuing personal, educational, employment, or other goals. In recognition of equal housing access as a fundamental right, the federal government and the State of California have both established fair housing choice as a right protected by law.

This report, the Analysis of Impediments to Fair Housing Choice (commonly known as the "AI"), presents a demographic profile of the City of Perris, assesses the extent of fair housing issues among specific groups, and evaluates the availability of a range of housing choices for all residents. This report also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person's access to housing.

## A. Community Background

Incorporated in 1911, the City of Perris is located in southwest Riverside County, approximately 80 miles southeast of Los Angeles and approximately 80 miles northeast of San Diego, on the Inland Route of the 215 Freeway.

The City's population growth was small but stable through each decade up to 1980. However, Perris experienced its first major growth period during the 1980s, when the total population grew more than three-fold (by over 215 percent) from 6,800 to 21,500 residents. Since then, the City has continued to experience significant growth, as the population increased by almost 67 percent during the 1990s and by another 89 percent between 2000 and 2010. Since 2010, the Perris population has grown another 14 percent. Population growth in the region was also significant during this time and the overall Riverside County population grew by over 30 percent each decade between 1990 and 2010. Countywide population has increased another ten percent since 2010.

Housing growth in Perris was among the highest in the County. Single-family detached units continued to account for the majority of homes in the community (77 percent), while the number of attached single-family units increased minimally. The number of multi-family units also increased but the proportion of these units decreased slightly to 12 percent of the City's housing stock.

Perris' population has become increasingly ethnically diverse during the last two decades. Most notable among the changes was the increase in Perris' Hispanic population and decrease in its White population. In 1990, Whites represented the largest racial/ethnic group in the City (nearly 48 percent), and Hispanics represented the next largest at approximately 36 percent. By 2010, the proportion of Hispanic residents had doubled to 72 percent of the population, making them the predominant racial/ethnic group in Perris.



## B. Fair Housing Legal Framework

Fair housing is a right protected by both 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 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 State 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 Section 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
- Generic 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 Section 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 Section 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 Section 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 Sections 11135**, **65008**, **and 65580-65589.8** prohibit discrimination in programs funded by the State and in any land use decisions. Specifically, Sections 65580-65589.8 require local jurisdictions to address the provision of housing options for special needs groups, including: persons with disabilities (including developmental disabilities); and the homeless.

## 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.

http://www.nolo.com/legal-update/california-landlords-ask-immigration-citizenship-29214.html



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 the 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.

## C. Purpose of Report

This Analysis of Impediments (AI) to Fair Housing Choice provides an overview of laws, regulations, conditions, and other possible obstacles that may affect an individual's or household's access to housing in Perris. The AI includes:

- A comprehensive review of Perris' laws, regulations, and administrative policies, procedures, and practices, and an assessment of how they affect the location, availability, and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choice.

The scope of analysis and the format used for this Al adhere to recommendations contained in the *Fair Housing Planning Guide* developed by HUD.



## D. Organization of Report

The AI is divided into six sections:

- I. Introduction Defines "fair housing" and explains the purpose of this report.
- **II. Community Profile** Presents the demographic, housing, and income characteristics in Perris. Major employers and transportation access to job centers are identified. The relationships among these variables are discussed.
- **III. Lending Practices** Analyzes private activities that may impede fair housing in Perris.
- **IV. Public Policies and Practices** Evaluates various public policies and actions that may impede fair housing choice in Perris.
- **V. Fair Housing Practices** Evaluates the fair housing services available to residents and identifies fair housing complaints and violations in Perris.
- **VI. Progress since Last AI** Reviews the City's progress in mitigating the impediments identified in the previous AI.
- **VII. Fair Housing Action Plan** Provides conclusions and recommendations about fair housing issues in Perris.

At the end of this report, a signature page includes the signature of the City Manager and a statement certifying that the AI represents Perris' official conclusions regarding impediments to fair housing choice and the actions necessary to address identified impediments.

## E. Data Sources

The following data sources were used to complete this AI. Sources of specific information are identified in the text, tables, and figures.

- Census data (1990-2010) and American Community Surveys<sup>2</sup>
- City of Perris 2014-2021 Housing Element
- City of Perris General Plan
- City of Perris Zoning Code
- Home Mortgage Disclosure Act (HMDA) data regarding lending patterns in 2012 and 2017
- Dataquick housing sales activity data
- Riverside Transit Agency (RTA) bus routes
- 2014-2019 Perris Consolidated Plan

The 2010 Census no longer provides detailed demographic or housing data through the "long form". Instead, the Census Bureau conducts a series of American Community Surveys (ACS) to collect detailed data. The ACS surveys different variables at different schedules (e.g. every year, every three years, or every five years) depending on the size of the community. Multiple sets of ACS data are required to compile the data for Perris in this report.



## F. Public Participation

This AI Report has been developed to provide an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual's or a household's access to housing. As part of this effort, the report incorporates the issues and concerns of residents, housing professionals, and service providers. To assure the report responds to community needs, development of the AI includes a community outreach program consisting of a public workshop, stakeholder meeting, and a meeting of the City Council.

## 1. Public Meetings

Public and private agencies either directly or indirectly involved with fair housing issues in the City were invited to attend a Stakeholder Meeting at 2:30 PM on January 10, 2019 at City Hall. This meeting was held specifically for housing professionals and service providers and gave them an opportunity to provide input on existing housing programs and assist in the development of new strategies to deal with any potential fair housing issues. To ensure that the fair housing concerns of low and moderate income and special needs residents were addressed, individual invitations were distributed via mail to agencies and organizations that serve the low and moderate income and special needs community.

To solicit input from the residents, a Community Workshop was held at 6 PM on January 10, 2019 at City Hall. The meeting provided an opportunity for the Perris community to share fair housing issues and concerns. Stakeholders were also invited to this Community Workshop.

A complete list of the agencies invited to the Stakeholder Meeting and a summary of all comments received at both the Stakeholder Meeting and Community Workshop can be found in



#### Appendix A.

#### Stakeholder Meeting

A total of 11 agencies attended the Stakeholder Meeting on January 10, 2019 and provided comments on fair housing issues in Perris. Stakeholders commented on the needs of seniors, homeless and the youth in the City, including the need for diverse programs for these specific groups. Input on general housing issues in the City indicated that residents often have a hard time finding places to live. In addition to the need for more affordable housing options, the agencies specifically noted the need for additional housing options for senior residents. Housing discrimination against seniors and disabled persons appear to be on the rise, especially relating to reasonable accommodation requests.

The need for programs and services for the City's homeless population was also emphasized. Specifically a need for a variety of supportive housing options, emergency shelters, and services geared toward helping homeless families find housing.

#### **Community Workshop**

A total of three participants attended the community workshop held on January 10, 2019 and provided comments on housing issues in Perris. Overall public input emphasized the increased need for programs and services for the homeless, including the need for more supportive housing. Public input also confirmed the need for additional programs for seniors, in addition to providing Fair Housing workshops specifically to educate seniors on issues of fair housing.

#### 2. Public Review

The City offered two 30-day public review periods:

- Preliminary Draft March 8, 2019 through April 9, 2019
- Final Draft April 12 through May 12, 2019

The Draft document was made available at the following locations:

- Perris City Hall (101 N D St, Perris, CA 92570)
- Perris City website at http://www.cityofperris.org/

Notice of the public review period was published in *The Perris Progress* newspaper on XXXX, 2019.[UPDATE]

## 3. Public Hearings

The City conducted a public hearing on April 9, 2019 to receive comments on the Al and approval of the Al will occur after a public hearing on May 14, 2019.



## **II.** Community Profile

A key fair housing goal is to foster an inclusive environment, where all people have the opportunity to find adequate and suitable housing. This chapter provides an overview of Perris' residents and housing stock, including population, economic, and housing trends which help to identify housing needs specific to Perris. This overview will provide the context for discussing and evaluating fair housing in the following chapters.

## A. Demographic Profile

Examination of demographic characteristics provides some insight regarding the need and extent of equal access to housing in a community. Factors such as population growth, age characteristics, and race/ethnicity all help determine a community's housing needs and play a role in exploring potential impediments to fair housing choice.

## 1. Population Growth

Incorporated in 1911, the City's population growth was small but stable through each decade up to 1980. Perris experienced its first major growth period during the 1980s, when the total population grew more than three-fold (by over 215 percent) from 6,800 to 21,500 residents. Since then, the City has continued to experience significant growth, as the population increased by almost 67 percent (to 36,200 residents) during the 1990s. According to the Census, Perris' population was 68,386 persons in 2010, an increase of approximately 89 percent since 2000. Population growth in the region was also significant during this time period with nearby Murrieta experience the most growth overall. By comparison, growth in Perris almost doubled the countywide average beween 1990 and 2010 (Table II.1). Since 2010, Perris' population increased another 14 percent, again exceeding the countywide average of ten percent.

**Table II.1: Population Growth** 

luuis distisus	4000	2000	2040	Growth			
Jurisdiction	1990	2000	2010	2018	(1990-2000)	(2000-2010)	(2010-2018)
Cathedral	30,085	42,647	51,200	54,791	41.8%	20.1%	7.01%
Corona	79,065	124,966	152,374	168,574	58.1%	21.9%	10.6%
Hemet	36,094	58,812	78,657	83,166	62.9%	33.7%	5.7%
Indio	36,793	49,116	76,036	87,883	33.5%	54.8%	15.6%
Moreno Valley	118,779	142,381	193,365	207,629	19.9%	35.8%	7.4%
Murrieta	1,628*	44,282	103,466	113,541	2,620.0%	133.7%	9.7%
Perris	21,460	36,189	68,386	77,837	68.6%	89.0%	13.8%
Riverside City	226,505	255,166	303,871	325,860	12.7%	19.1%	7.2%
Temecula	27,099	57,716	100,097	113,181	113.0%	73.4%	13.1%
Riverside County	1,170,413	1,545,387	2,189,641	2,415,955	32.0%	41.7%	10.3%

Source: Bureau of the Census, 1990-2010 Census, State Department of Finance Population and Housing Estimates 2018. Note: \*= The City of Murrieta was not incorporated until 1991. Murrieta was a Census Designated Place (CDP) in 1990.



## 2. 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-age 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 II.2 shows the age characteristics of Perris residents from 2000 to 2017. The American Community Survey (ACS) data indicates that the majority of the City's population is generally younger—with 74 percent of residents under 44 years of age. However, the population is aging. Between 2010 and 2017, the percentage of residents over 55 increased, while the younger population decreased proportionally. The median age in Perris was 27.9 years old, according to the 2013-2017 American Community Census, a significant increase from the 25.9 years recorded by the 2010 Census.

Table II.2: Age Characteristics

	2000		2010		2013-2017	
Age Group (years)	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
<5	3,923	10.8%	6,836	10.0%	6,037	8.0%
5-14	8,462	23.4%	14,036	20.5%	13,898	18.5%
15-24	5,514	15.2%	12,367	18.1%	14,428	19.2%
25-34	5,689	15.7%	10,190	14.9%	11,333	15.1%
35-44	5,472	15.1%	9,898	14.5%	9,738	13.0%
45-54	3,143	8.7%	7,571	11.1%	9,648	12.9%
55-64	1,727	4.8%	4,140	6.1%	5,375	7.2%
65+	2,259	6.2%	3,348	4.9%	4554	6.1%
Total	36,189	100.0%	68,386	100.0%	75,011	100.0%

Source: Bureau of the Census, 1990-2010 Census; 2013-2017 American Community Survey.

#### 3. Race and Ethnic Characteristics

Between 2010 and 2017, the racial and ethnic makeup of the City's residents changed significantly. Most notable among the changes was the increase in Perris' Hispanic population and decrease in its White population. In 1990, Whites represented the largest racial/ethnic group in the City (nearly 48 percent), and Hispanics represented the next largest at approximately 36 percent. By 2017, the proportion of Hispanic residents had doubled to 75



percent of the population, making them the predominant racial/ethnic group in Perris (Table II.3). The City's Black population has also grown significantly and, by 2017, Blacks matched Whites as the second largest racial/ethnic groups in the City.

Table II.3: Race and Ethnicity

	2000		2010		2013-2017	
Race	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Asian	940	2.6%	2,285	3.3%	2,612	3.5%
Hispanic	20,322	56.2%	49,079	71.8%	56,324	75.1%
White	8,243	22.8%	7,499	11.0%	7,718	10.3%
African American	5,574	15.4%	7,763	11.4%	7,227	9.6%
Other	1,110	3.1%	1,760	2.6%	1130	1.5%
Total	36,189	100.0%	68,386	100.0%	75,011	100.0%

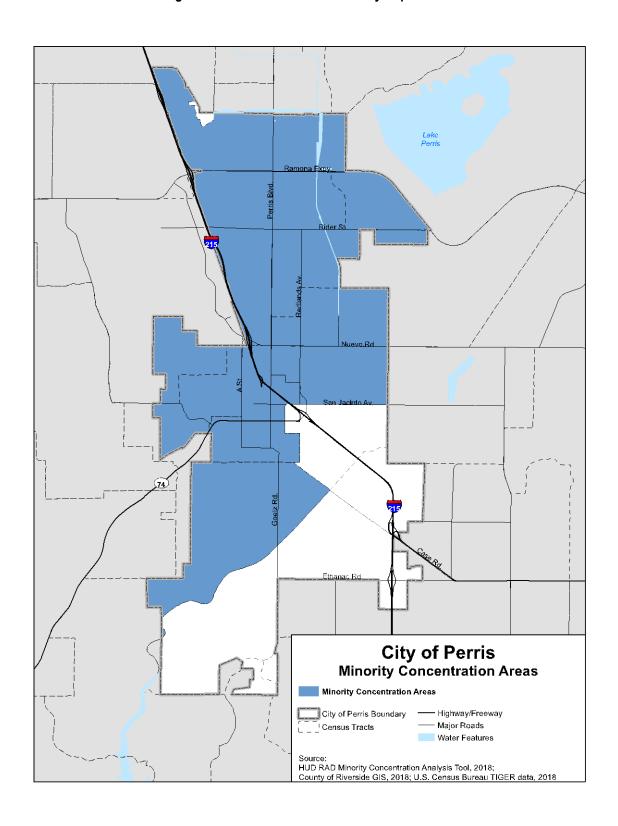
Source: Bureau of the Census, 2000-2010 Census; 2013-2017 American Community Survey.

#### **Areas of Minority Concentration**

A minority concentration area is defined as a Census block group whose proportion of non-White residents is greater than the proportion of non-White residents in the overall population of Riverside County. For Perris, minority concentration areas are Census block groups whose non-White population makes up more than 78.8 percent of the total population for that block group. Figure II.1 illustrates the location of these block groups. Areas of minority concentration areas can be seen throughout the majority of the City. The remaining areas where no concentrations are shown are primarily open space and industrial areas with no residential populations.



Figure II.1: Concentrations of Minority Populations





#### **Linguistic Isolation**

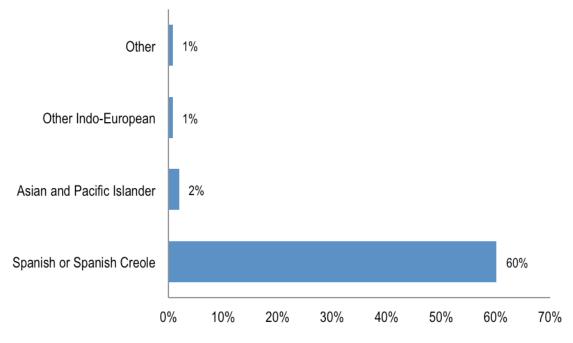
Reflective of the City's heavily Hispanic population, 64 percent of all Perris residents speak languages other than English at home, and 36 percent speak English "less than very well." Linguistic isolation in the City is more severe among Hispanics than among Asians. Approximately 29 percent of Perris residents speaking Asian languages at home speak English "less than very well." In comparison, 37 percent of City residents speaking Spanish at home speak English "less than very well." Spanish speaking households represented the majority of households speaking a language other than English at home (60 percent).

**Table II.4: English Language Ability** 

Language Ability	Asian and Pacific Islander		Spanish or Spanish Creole		Other Indo-European		Other	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Speak English "very well"	996	71.4%	26,289	63.3%	414	71.6%	486	92.6%
Speak English less than "very well"	399	28.6%	15,239	36.7%	164	28.4%	39	7.4%
Total	1,395	100.0%	41,528	100.0%	578	100.0%	525	100.0%

Source: American Community Survey, 2013-2017.

Figure II.2: Language Spoken at Home





#### B. Household Profile

Information on household characteristics aids in understanding changing housing needs. The Bureau of the Census defines a household as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, and unrelated individuals living together. Various household characteristics may affect equal access to housing, including household type and size, income level, and the presence of persons with special needs.

## 1. 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.

The 2010 Census reported 16,365 households in Perris, an increase of nearly 70 percent since 2000. Family households remain the predominant household type (88 percent of all households) in Perris. The number of singles and other households also increased during the same time period; however, their proportion (relative to all households) continued to decline.

Between 2000 and 2010, average household size in Perris increased from 3.73 to 4.16, as did the average family size (from 4.00 to 4.32). The racial/ethnic composition of a community often affects housing needs due to the unique characteristics and housing preferences of different groups. Average household and family size in the City are much larger than for Riverside County as a whole, which had an average household size of 3.14 and average family size of 3.61 in 2010. According to the 2013-2017 ACS, the overall household composition reflects the continuing trend of larger household size.

Table II.5: Household Characteristics and Trends (2000-2017)

Household Type	2000		2010		2013-2017	
nousellolu Type	Number	Percent	Number	Percent	Number	Percent
Total Households	9,652	100.0%	16,365	100.0%	16,582	100.0%
Families	8,114	84.1%	14,347	87.7%	14,414	86.9%
Singles	1,179	12.2%	1,442	8.8%	1625	9.8%
Other	359	3.7%	576	3.5%	543	3.3%
Average Household Size	3.73		4.16		4.51	
Average Family Size	4.00		4.32		4.66	

Source: Bureau of the Census, 1990-2010; 2013-2017 American Community Survey (ACS). Note: The 2013-2017 ACS does not provide an Average Household Size or Average Family Size



#### C. 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 II.6 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, the State income definitions may be used, depending on the housing programs and funding sources in question.

**Table II.6: Income Categories** 

HUD D	efinition	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: Department of Housing and Urban Development and California Department of Housing and Community Development, 2019.

#### 1. Median Household Income

According to the 2013-2017 ACS, Perris households had a median income of \$54,657. Table II.7 displays median household income in the City and Riverside County, as recorded by the 2000 Census and the 2013-2017 ACS. Overall, the County's median income was higher than the City's; however, both the City and the County experienced significant increases in median income between 2000 and 2017. Perris' median income growth during this time period outpaced the County's.

Table II.7: Median Household Income (2000-2017)

Jurisdiction	Median House	% Change	
Junsaiction	2000	2013-2017	% Change
Perris	\$35,042	\$54,657	55.9%
Riverside County	\$42,811	\$60,807	42.0%

Sources: Bureau of the Census, 2000 and American Community Survey, 2007-2011.



#### 2. Income Distribution

HUD periodically receives "custom tabulations" of Census data from the U.S. Census Bureau that are largely not available through standard Census products. The most recent estimates are derived from the 2011-2015 ACS Five-Year Estimates. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS cross-tabulates the Census data to reveal household income in a community in relation to the AMI. As defined by CHAS, housing problems include:

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

According to the CHAS data in Table II.8, 29 percent of Perris households were within the extremely low income (30 percent AMI) and low income (50 percent AMI) categories, and 22 percent were within the moderate income (80 percent AMI) category. About one-half of Perris households (50 percent) were within the middle/upper-income category (greater than 80 percent AMI). Overall, the City of Perris has a lower proportion of lower income households and higher proportion of middle and upper income households than Riverside County as a whole.

Table II.8: Income Distribution (2011-2015)

City/Area	Total Households	% Extremely Low Income	% Low Income	% Moderate Income	% Middle/ Upper Income
Perris	16,299	12.3%	16.9%	21.8%	49.0%
Riverside County	699,240	11.2%	11.6%	16.6%	60.5%

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: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, American Community Survey, 2011-2015 Estimates.

## 3. Household Income by Household Type

Household income often varies by household type. For example, seniors in Perris were more likely than all other household types to earn lower incomes. As shown, in Table II.9, elderly households had the highest proportion of extremely low income households (at 24 percent) and the highest proportion of households earning less than 80 percent of the AMI (at 63 percent).



Table II.9: Housing Assistance Needs of Low and Moderate Income Households (2011-2015)

Household by Type, Income, and		Re	nters			Owi	ners		Total	
Housing Problem	Elderly	Small Families	Large Families	Total Renters	Elderly	Small Families	Large Family	Total Owners	Households	
Extremely-Low-Income (0-30% AMI)	55	515	450	170	1,190	155	460	170	35	
# With Housing Problems	35	345	450	155	985	140	345	165	15	
% With Housing Problems	63.6%	67.0%	100.0%	91.2%	82.8%	90.3%	75.0%	97.1%	42.9%	
Low-Income (31-50% AMI)	85	530	550	125	1,290	190	560	505	205	
# With Housing Problems	80	475	525	110	1,190	65	520	465	180	
% With Housing Problems	94.1%	89.6%	95.5%	88.0%	92.2%	34.2%	92.9%	92.1%	87.8%	
Moderate-Income (51-80% AMI)	39	855	465	80	1,439	260	915	850	85	
# With Housing Problems	0	725	425	35	1,185	130	750	765	75	
% With Housing Problems	0.0%	84.8%	91.4%	43.8%	82.3%	50.0%	82.0%	90.0%	88.2%	
Middle/Upper-Income (80%+ AMI)	60	1,070	710	260	2,100	590	3,080	1,860	360	
# With Housing Problems	15	345	335	80	775	170	845	715	160	
% With Housing Problems	25.0%	32.2%	47.2%	30.8%	36.9%	28.8%	27.4%	38.4%	44.4%	
Total Households	239	2,970	2,175	635	6,019	1,195	5,015	3,385	685	
# With Housing Problems	130	1,890	1,735	380	4,135	505	2,460	2,110	430	
% With Housing Problems	54.4%	63.6%	79.8%	59.8%	68.7%	42.3%	49.1%	62.3%	62.8%	

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: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, based on American Community Survey, 2011-2015 Estimates.



## 4. Income Distribution by Race/Ethnicity

Race/ethnicity is also a characteristic that affects housing need since household income often varies by race/ethnicity. Overall, middle/upper-income households comprised approximately percent of all households in Perris from 2011-2015 (Table II.10). However, certain groups had higher proportions of low and moderate income households. Approximately 58 percent of Black households and 53 percent of Hispanic households in Perris earned low and moderate incomes, compared to 51 percent of all households in the City.

Table II.10: Income by Race/Ethnicity (2011-2015)

Income	Total		Non-Hispanic White		Hispanic or Latino		Black or African American		Asian	
Level	Households	HHs	Percent	HHs	Percent	HHs	Percent	HHs	Percent	
Extremely Low	12.38%	169	6.6%	1,315	12.2%	480	23.1%	29	4.4%	
Low	16.87%	350	13.6%	1,980	18.3%	285	13.7%	115	17.4%	
Moderate	21.84%	530	20.6%	2,455	22.7%	435	21.0%	94	14.2%	
Middle/Upper	48.9%	1,529	59.3%	5,070	46.9%	875	42.2%	423	64.0%	
Total Households	16,297	2,578	15.8%	10,820	66.4%	2,075	12.7%	661	4.1%	

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) Data, American Community Survey 2011-2015 Estimates.

## 5. Concentrations of Low and Moderate Income Population

HUD defines a Low and Moderate Income area as a census tract or block group where over 51 percent of the population is Low and Moderate Income. Figure II.3 identifies the low and moderate income areas in the City by census block group. The City's low and moderate income areas generally correlate with its minority concentration areas.



Nuevo Rd. Ethanac Rd **City of Perris** Low and Moderate Income Areas Low and Moderate Income Areas Census block groups where over 51% of the population is LMI. City of Perris Boundary — Highway/Freeway Census Block Groups - Major Roads Water Features HUD, ACS 5-Year 2011-2015 LMI Summary Data; County of Riverside GIS, 2018; U.S. Census Bureau TIGER data, 2015, 2018

Figure II.3: Concentration of Low and Moderate Income Population



## D. Special Needs Households

Certain households, because of their special characteristics and needs, may require special accommodations and may have difficulty finding housing due to special needs. Special needs groups include seniors, persons with disabilities, persons with HIV/AIDS, families with children, single-parent households, large households, homeless persons and persons at-risk of homelessness, and farm workers.

#### 1. Seniors

Seniors are vulnerable to housing problems and housing discrimination due to their limited incomes, prevalence of physical or mental disabilities, limited mobility, and high health care costs. The elderly, and particularly those with disabilities, may face increased difficulty in finding housing accommodations, and may become victims of housing discrimination or fraud.

The City's senior population is fairly small and significantly smaller than the rest of the region. According to 2010 Census data, an estimated 16 percent of households in the City had at least one individual who was 65 years of age or older. Countywide, about 27 percent of households had at least one senior member. According to the 2013-2017, just six percent of all residents in the City were ages 65 and over, while in the County, senior residents represented nearly 14 percent of the total population (Table II.11).

Though the number of seniors in the City is low, Perris' elderly residents are more likely than other household types to earn lower incomes and suffer from housing problems. According to CHAS data, approximately 55 percent of elderly households in the City had low and moderate incomes, while the County had a slightly lower proportion of elderly households with low and moderate incomes (47 percent) (Table II.11). Furthermore, 2011-2015 CHAS data found that approximately 44 percent of all elderly households in the City experienced housing problems, such as cost burden or substandard housing, compared to only 41 percent of the County's elderly households. Housing problems were significantly more likely to affect elderly renter-households than elderly owner-households in both the City and the County.

Table II.11: Senior Profile (2013-2017)

Area	% of Population	With a Disability	Low/Moderate Income Households	Households with Housing Problems
Perris	6.0%	43.1%	54.7%	44.3%
Riverside County	13.5%	36.0%	46.9%	41.0%

Sources: Bureau of the Census, 2010; American Community Survey, 2013-2017; and HUD Comprehensive Housing Affordability Strategy (CHAS), based on 2011-2015 ACS.

#### Resources

There are 308 rental units in four rental properties in Perris that are restricted for those age 62 and older, with renter qualifications not to exceed anywhere from 50 percent to 80 percent of median income.

In addition to the senior housing developments above, a number of licensed residential care facilities also serve seniors in the City. Figure II.7 illustrates the location of licensed residential care facilities located in Perris. As shown, the City has 12 residential care facilities for the elderly; these facilities have the capacity to serve 282 persons.



The Perris Senior Center has been designated as a nutrition site by the County of Riverside Office on Aging. This designation allows the City to provide a daily meal program for seniors and as a resource to obtain information and access to services for seniors. A wide variety of activities are coordinated with various public agencies such as the Perris Valley Senior's Incorporated, AARP, Inland County Legal Services, Second Harvest Food Bank, and Family Services Association. The City's Senior Services division also coordinates senior trips and tours. A comprehensive service directory provided by the Riverside County Network of Care for seniors and persons with disabilities is available online at:

#### http://riverside.networkofcare.org/

Various affordable housing opportunities are also available to the City's senior residents, including:

Table II.12: Senior Rental Housing in Santa Clarita

Name of Project	Address and Phone	Total Units	# of Affordable Units	Finance Source
Perris Park	1204 S. Perris Blvd.	80	79	LIHTC
Perris Station Senior Apartments	24 South D Street	84	83	LIHTC
San Jacinto Vista I	202 E. Jarvis Street	86	86	LIHTC, Affordable Housing Subsidized; Section 515 Rural Rental Housing; Section 521 USDA Rental Assistance
San Jacinto Vista II	2020 E. Jarvis Street	60	60	Affordable Housing Subsidized; Section 515 Rural Rental Housing
Total		310	308	

Source: City of Perris, 2019

#### 2. Persons with Disabilities

The Americans with Disabilities Act (ADA) defines a disability as a "physical or mental impairment that substantially limits one or more major life activities." Fair housing choice for persons with disabilities can be compromised based on the nature of their disability. Persons with physical disabilities may face discrimination in the housing market because of the use of wheelchairs, need for home modifications to improve accessibility, or other forms of assistance. Landlords/owners sometimes fear that a unit may sustain wheelchair damage or may refuse to exempt disabled tenants with service/guide animals from a no-pet policy. A major barrier to housing for people with mental disabilities is opposition based on the stigma of mental disability. Landlords often refuse to rent to tenants with a history of mental illness. Neighbors may object when a house becomes a group home for persons with mental disabilities. While housing discrimination is not covered by the ADA, the Fair Housing Act prohibits housing discrimination against persons with disabilities, including persons with HIV/AIDS.

According to the 2013-2017 ACS, nine percent of the City's population and 12 percent of the County's population suffered from one or more disabilities (Table II.13). Special housing needs for persons with disabilities fall into two general categories: physical design to address mobility impairments and in-home social, educational, and medical support to address developmental and mental impairments. Among persons living with disabilities in Perris, ambulatory disabilities



were most prevalent (50 percent), followed by cognitive disabilities (44 percent), and independent living disabilities (36 percent).

Table II.13: Persons with Disabilities Profile (2013-2017)

Area	% of Population	Hearing Disability	Vision Disability	Cognitive Disability	Ambulatory Disability	Self-Care Disability	Independent Living Disability
Perris	8.9%	17.1%	24.7%	43.6%	50.4%	20.4%	36.3%
Riverside County	11.5%	28.0%	20.0%	36.4%	53.1%	21.9%	37.2%

Source: American Community Survey, 2013-2017.

#### **Persons with Developmental Disabilities**

As defined by the Section 4512 of the Welfare and Institutions Code, "developmental disability" means "a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual. As defined by the Director of Developmental Services, in consultation with the Superintendent of Public Instruction, this term shall include mental retardation, cerebral palsy, epilepsy, and autism. This term shall also include disabling conditions found to be closely related to mental retardation or to require treatment similar to that required for individuals with mental retardation, but shall not include other handicapping conditions that are solely physical in nature." The term also reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that could be defined as developmentally disabled is 1.5 percent. This equates to 1,122 persons in Perris with developmental disabilities, based on the 2013-2017 ACS population.

According to the State's Department of Developmental Services, as of January 2019, approximately 1,495 Perris residents with developmental disabilities were being assisted at the Inland Regional Center. Most of these individuals were residing in a private home with their parent of guardian and 814 of these persons with developmental disabilities were under the age of 18.

#### Resources

To help meet the needs of the disabled population, the City has a number of community care facilities that provide supportive services to persons with disabilities. According to the California Department of Social Services, Community Care Licensing Division, there are three adult day care facilities, four adult residential facilities, and five residential care facilities for the elderly located in Perris. The location of these facilities can be found in Figure II.7. The adult day care facilities have the capacity to serve 200 persons, the adult residential care facilities have the capacity to serve 21 persons, and the residential care facilities for the elderly have the capacity to serve 61 persons.

The Coachella Valley Housing Coalition, a non-profit developer, constructed a 75-unit affordable housing complex financed through a mix of tax credits, MHSA funding, and Riverside County HOME funds. The project includes units reserved for independent living mental health



participants, units reserved for HOPWA clients, and the balance of the units will be reserved for families at affordable rents. The project was completed in 2015.

The Perris Zoning Code accommodates both small and large residential care facilities. Small residential care facilities that serve six or fewer persons are permitted by-right in nearly all of the City's residential zones, with the exception of the R-4 and R-5 zones which are reserved for mobile homes. Large residential care facilities and care centers are subject to the review and approval of a conditional use permit. Large residential care facilities (7 to 12 persons) require a permit with conditions of approval and are required to comply with development standards of the applicable zone and additional parking standards to ensure that there is adequate off-street parking for employees and those residing at the facility. Residential care centers (12 or more) require a conditional use permit and are deemed a non-residential use in the Zoning Code. Residential care centers have more stringent development standards.

Individuals with special needs can benefit from the programs and services offered by various organizations in neighboring communities and throughout Riverside County. These organizations include Ability Counts, Community Access Center (CaC), Community Action Partnership of Riverside County, Corona-Norco United Way, Riverside County Office on Aging, The Arc of Riverside County, and United Cerebral Palsy of the Inland Empire, among others. A comprehensive service directory provided by the Riverside County Network of Care for seniors, persons with disabilities and mental health issues is available online at:

#### http://riverside.networkofcare.org/

#### **Reasonable Accommodation**

The Fair Housing Act, as amended in 1988, requires that cities and counties provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities. While fair housing laws intend that all people have equal access to housing, the law also recognizes that people with disabilities may need extra tools to achieve equality. Reasonable accommodation is one of the tools intended to further housing opportunities for people with disabilities. For developers and providers of housing for people with disabilities who are often confronted with siting or use restrictions, reasonable accommodation provides a means of requesting from the local government flexibility in the application of land use, zoning, and building code regulations or, in some instances, even a waiver of certain restrictions or requirements because it is necessary to achieve equal access to housing. Cities and counties are required to consider requests for accommodations related to housing for people with disabilities and provide the accommodation when it is determined to be "reasonable" based on fair housing laws and the case law interpreting the statutes.

The City amended the Zoning Code in 2013 (Ordinance 1296) to adopt formal reasonable accommodation procedures. Reasonable accommodation provides a basis for residents with disabilities to request flexibility in the application of land use and zoning regulations or, in some instances, even a waiver of certain restrictions or requirements from the local government to ensure equal access to housing opportunities. The City continues to provide information regarding the City's reasonable accommodation ordinance to interested parties and makes information on the ordinance widely available to residents.



#### 3. Families with Children

Families with children often face housing discrimination by landlords who fear that children will cause property damage. Some landlords may also have cultural biases against children of opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns. According to the 2013-2017 ACS, approximately 51 percent of all households in Perris were family households with children under the age of 18 and about 21 percent of total households were female-headed single-parent households with children.

#### Resources

A variety of city programs and services are available for children and young adults in the community. Among the programs offered, the City's Community Services Department coordinates various excursions, classes, and activities for youth. When the City's Senior Center is closed for servicing senior residents, it also serves as the Teen Center Game Zone. Families with children can also benefit from support services offered by various organizations in neighboring communities, including Community Action Partnership of Riverside County, the Family Services Association, Path of Life Ministries, Valley Community Pantry, and Walden Family Services, among others.

For families with needs for assistance with childcare expenses, the Riverside County Department of Public Social Services (DPSS) Child Care programs provide child care payments to a variety of eligible families. In addition, the Riverside County Child Care Consortium (RCCCC) provides advocacy and resource services to promote quality child care services that are affordable and accessible to families in Riverside County.

The City also offers housing programs that benefit families in Perris. Since 2009, the City Council has approved a resolution agreeing to participate in the Riverside County Economic Development Agency (EDA) Mortgage Credit Certificate (MCC) program. A MCC entitles qualified Perris homebuyers to reduce the amount of their federal income tax liability by an amount equal to a portion of the interest paid during the year on a home mortgage.

## 4. Single-Parent Households

Single-parent households often require special consideration and assistance as a result of their greater need for affordable housing, 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 2010, approximately 2,763 single-parent households resided within Perris, representing 17 percent of the City's households.

Single-parent households, especially single mothers, may also be discriminated against in the rental housing market. At times, landlords may be concerned about the ability of such households to make regular rent payments and therefore, may require more stringent credit checks or higher security deposit for women. Of particular concern are single-parent households with lower incomes. Data from the 2013-2017 ACS indicates that approximately 48 percent (1,188 households) of the City's female-headed households with children had incomes below the poverty level.



#### Resources

Limited household income constrains the ability of these households to afford adequate housing and provide for childcare, health care, and other necessities. Finding adequate and affordable childcare is also pressing issue for many families with children and single parent households in particular. For single-parents with needs for assistance with childcare expenses, the Riverside County Department of Public Social Services (DPSS) Child Care programs provide child care payments to a variety of eligible families. Through this DPSS program all child care funds are paid on behalf of the customer directly to the provider of their choice, based on a maximum payout rate set by the State of California. In addition, the Riverside County Child Care Consortium (RCCCC) provides advocacy and resource services to promote quality child care services that are affordable and accessible to families in Riverside County. The RCCCC provides County residents with community events for children and families and also provides bilingual brochures and general child care resource information.

Single-parent households can also benefit from support services offered by various organizations in neighboring communities, including Community Action Partnership of Riverside County, the Family Services Association, Path of Life Ministries, Valley Community Pantry, and Walden Family Services, among others.

## 5. Large Households

Large households are defined as households 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 in order 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 2010 Census reported 6,603 large households in Perris, representing approximately 40 percent of all households. Among the City's large households, 65 percent owned their own homes and 35 percent were renters. The 2011-2015 CHAS data also indicates that 80 percent of the City's large renter-households and 62 percent of the large owner-households were experience at least one housing problems.

#### Resources

The City's large households can benefit from programs and services that provide assistance to lower and moderate income households in general, such as the Housing Choice Voucher program, which offers rental assistance to residents. In addition, large households can benefit from the support services offered by various organizations in neighboring communities, including Community Action Partnership of Riverside County, the Family Services Association, Path of Life Ministries, Valley Community Pantry, and Walden Family Services, among others.



#### 6. Homeless Persons

According to HUD, a person is considered homeless if they are not imprisoned and: (1) lack a fixed, regular, and adequate nighttime residence; (2) their primary nighttime residence is a publicly or privately operated shelter designed for temporary living arrangements, or an institution that provides a temporary residence for individuals who should otherwise be institutionalized; or (3) a public or private place not designed for or ordinarily used as a regular sleeping accommodation.

Formerly homeless persons often have a very difficult time finding housing once they have moved from transitional housing or other assistance program. Housing affordability for those who were formerly homeless is challenging from an economics standpoint, but this demographic group may also encounter fair housing issues when landlords refuse to rent to formerly homeless persons. The perception may be that they are more economically (and sometimes mentally) unstable.

According to 2018 Riverside County Homeless Count and Survey Report, there were an estimated 1,685 unsheltered homeless people throughout the Riverside County, an approximate 2.9 percent increase since 2017. Within the City of Perris, the unsheltered homeless population was estimated at 95 persons.

#### Resources

The County of Riverside, through its Department of Social Services, contracts with local community based organizations to provide programs for the homeless in each appropriate location. An emergency shelter in Hemet accommodates homeless persons from the Perris area.

The City of Perris recognizes the need for ongoing supportive services and development of affordable housing to prevent homelessness, particularly for extremely low-income households (households making less than 30 percent AMI). The City has cooperative relationships with various organizations to provide homeless services, such as with the Fair Housing Council of Riverside County, the County of Riverside Department of Public Social Services Homeless Programs Unit, the Continuum of Care for Riverside County (CoC), and Community Connect.

#### 7. Persons with HIV/AIDS

Persons with HIV/AIDS face an array of barriers to obtaining and maintaining affordable, stable housing. For persons living with HIV/AIDS, access to safe, affordable housing is as important to their general health and well-being as access to quality health care. For many, the persistent shortage of stable housing can be the primary barrier to consistent medical care and treatment. In addition, persons with HIV/AIDS may also be targets of hate crimes, which are discussed later in this document. Despite federal and state anti-discrimination laws, many people face illegal eviction from their homes when their illness is exposed. Stigmatism associated with their illness and possible sexual orientation can add to the difficulty of obtaining and maintaining housing. The **Fair Housing Amendments Act of 1988**, which is primarily enforced by HUD, prohibits housing discrimination against persons with disabilities, including persons with HIV/AIDS.



Persons with HIV/AIDS require a broad range of services, including counseling, medical care, in-home care, transportation, and food, in addition to stable housing. Today, persons with HIV/AIDS live longer and require longer provision of services and housing. Stable housing promotes improved health, sobriety, decreased drug abuse, and a return to paid employment and productive social activities resulting in an improved quality of life. Furthermore, stable housing is shown to be cost-effective for the community in that it helps to decrease risk factors that can lead to HIV and AIDS transmission.

According to the 2017 Epidemiology of HIV/AIDS in Riverside County Report by the County of Riverside Department of Public Health Epidemiology and Program Evaluation Branch, there were 2,046 people reported to be living with HIV/AIDS in West Riverside County, which includes the City of Perris.

#### Resources

The Riverside County Department of Public Health HIV/STD Program coordinates the overall response to HIV/AIDS in the County in collaboration with community-based organizations, governmental bodies, advocates and people living with HIV/AIDS. Some of the programs offered include administration, HIV testing (including partners), the Early Intervention Program (EIP), education and prevention outreach, surveillance, mental health, and HIV Transmission Prevention Program (HTPP). The program also provides assistance linking newly diagnosed HIV infected individuals with care.

## E. 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 section 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 which have direct access from outside the building or through a common hall.

## 1. Housing Growth

As shown in Table II.14, housing growth in Perris was among the highest in the County. Between 2000 and 2010, the City's housing stock grew by almost 70 percent. The City's growth rate during this period was comparable to housing growth in nearby Indio and Temecula, but significantly greater than the growth experienced by the County overall. In more recent years housing growth slowed in Perris, and similarly throughout Riverside County, between 2010 and 2018.



Table II.14: Housing Stock Growth (2000-2018)

Jurisdiction	2000	2010	2018	Percent Change 2000-2010	Percent Change 2010-2018
Cathedral	17,893	20,995	21,219	17.3%	1.1%
Corona	39,271	41,174	49,277	4.8%	19.7%
Hemet	29,401	35,305	36,000	20.1%	1.9%
Indio	16,909	28,971	31,930	71.3%	10.2%
Moreno Valley	41,431	55,559	56,576	34.1%	1.8%
Murrieta	14,921	35,294	36,640	136.5%	3.8%
Perris	10,553	17,906	19,206	69.7%	7.3%
Riverside City	85,974	98,444	100,515	14.5%	2.1%
Temecula	19,099	34,004	36,456	78.0%	7.2%
Riverside County	584,674	800,707	840,904	36.9%	5.0%

Source: Bureau of the Census 2000-2010, State Department of Finance Population and Housing Estimates, 2018. Note: \*= The City of Murrieta was not incorporated until 1991. Murrieta was a Census Designated Place (CDP) in 1990.

## 2. Housing Type

A community's housing stock is primarily comprised of three different types of housing: single-family dwelling units, multi-family dwelling units, and other types of units such as mobile homes. Table II.15 provides a summary of Perris' housing stock by unit type in 2000 and 2018. Some changes have occurred in the composition of the City's housing stock during the last decade. As shown below, single-family detached units continued to account for the majority of homes in the community. The number of single-family detached homes nearly doubled, with 7,770 homes added to the City's housing stock between 2000 and 2018, and their proportion of the total housing stock increased from 67 percent to 77 percent. The number of multi-family units also increased during this time, but their proportion of total units decreased from 14 percent to 12 percent between 2000 and 2018.

Table II.15: Housing Characteristics and Trends (2000-2018)

	20	00	201	Percent	
Housing Type	Number of Units	Percent of Total	Number of Units	Percent of Total	Change in Units
Single-Family Detached	7,015	66.8%	14,785	77.0%	110.8%
Single-Family Attached	319	3.0%	391	2.0%	22.6%
Total Single-Family	7,334	69.8%	15,176	79.0%	106.9%
Multi-Family 2-4 Units	357	3.4%	633	3.3%	77.3%
Multi-Family 5+ Units	1,121	10.7%	1,725	9.0%	53.9%
Total Multi-Family	1,478	14.1%	2,358	12.3%	59.5%
Mobile Homes, Trailer & Other	1,690	16.1%	1,672	8.7%	-1.1%
Total	10,502	100.0%	19,206	100.0%	82.9%

Source: Bureau of the Census, 2000; State Department of Finance and Population and Housing Estimates, 2018.



## 3. Housing Tenure and Vacancy

Tenure in the housing industry typically refers to the occupancy of a housing unit – whether the unit is owner-occupied or an occupied rental unit. Tenure preferences are primarily related to household income, composition, and ages of the household members. The tenure distribution (owner versus renter) of a community's housing stock influences several aspects of the local housing market. Residential mobility is also influenced by tenure, with owner-occupied housing evidencing a much lower turnover rate than rental housing. In addition, housing problems, such as cost burden, are generally more prevalent among renters than among owners. However, the extremely high costs of homeownership in Southern California also create high levels of housing cost burden among homeowners.

According to the 2010 Census, 66 percent of Perris households owned their homes, while 34 percent were renters. The number of renter-households decreased two percent between 2000 and 2010, while owner-households increased by four percent. In the past, housing discrimination issues are more prevalent in the rental housing market since renters are more likely to be subject to conditions in the housing market that are beyond their control. However, with the widespread of foreclosures, allegations regarding unfair practices against homeowners have also increased.

Housing vacancy rates – the number of vacant units compared to the total number of units - reveal information on the housing supply and demand within a community. A certain number of vacant units are needed to moderate the cost of housing, allow sufficient choice for residents and provide an incentive for unit upkeep and repair. Vacancy rates are generally higher among rental properties, as rental units have greater attrition than owner-occupied units. A healthy vacancy rate is one which permits sufficient choice and mobility among a variety of housing units. Generally, a vacancy rate of two to three percent for ownership units and five to six percent for rental units is considered optimal. Low vacancy rates can indicate a heightened likelihood of housing discrimination, as the number of house-seekers increases while the number of available units remains relatively constant. Managers and sellers are then able to choose occupants based on possible biases because the applicant pool is large.

Given the City's tenure distribution, a healthy overall vacancy rate should be around four percent. The 2010 Census estimates an overall vacancy rate for Perris of nine percent, consistent with the vacancy rates in the past. However, this generally higher vacancy rate is typical for communities with significant construction activities where new units are constantly being put on the market. The 2013-2017 ACS estimates that of the occupied units, 62 percent were owner-households and 37 percent were renter-households. Overall vacancy rate was 5.5 percent of the entire housing stock.



**Table II.16: Housing Tenure (1990-2010)** 

	19	1990		2000		2010		Change
Tenure	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total	1990- 2000	2000- 2010
Total Occupied	6,726	100.0%	9,652	100.0%	16,365	100.0%	43.5%	69.6%
Owner Occupied	4,701	69.9%	6,577	68.1%	10,854	66.3%	39.9%	65.0%
Renter Occupied	2,025	30.1%	3,075	31.9%	5,511	33.7%	51.9%	79.2%
Vacancy Rates								
Rental Vacancy	7%		7%		7%			
Owner Vacancy	10	1%	4%		6%			
Overall Vacancy	13	3%	9'	%	9%			

Note: Overall Vacancy Rates include other vacancies in addition to owner/rental, including seasonal, other, and rented or sold but not occupied

Source: Bureau of the Census, 1990-2010.

## 4. Housing Condition

Assessing housing conditions in the City can provide the basis for developing policies and programs to maintain and preserve the quality of the housing stock. Housing age can indicate general housing conditions within a community. In general, housing is subject to gradual deterioration over time. Deteriorating housing can depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood.

Most residential structures over 30 years of age will require minor repair and modernization improvements, while units over 50 years of age are more likely to require major rehabilitation such as roofing, plumbing, and electrical system repairs. Generally, a housing unit exceeds its useful life after 70 years of age, if not properly maintained.

The age of the City's housing stock, as defined by the year the units were built, is shown in Figure II.4. As of 2017, only 19 percent of all housing units in the City were built prior to 1979, making only a small proportion of housing units in Perris 30 years old or older. Corresponding with increases in the City's population, the City's first housing boom occurred during the 1980s. In addition, a significant portion of housing units in Perris were built after 2000 (45 percent).

While the City's housing stock is fairly new, home maintenance can be economically and physically difficult for elderly homeowners and lower income homeowners. With limited funding, however, the City's Housing Authority suspended Senior Home Rehabilitation Program and Residential Rehabilitation Program. The City may consider reinstating these programs as funding permits.



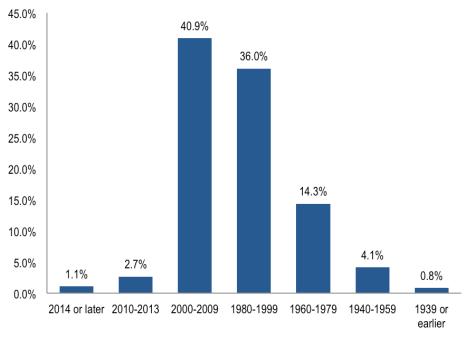


Figure II.4: Age of Housing Stock (2017)

Source: US American Community Survey, 2013-2017.

### **Substandard Conditions**

A housing conditions survey has not been conducted in recent years; however, Perris' fairly new housing stock makes it unlikely that a large number of substandard units exist within the City.

#### **Lead-Based Paint Hazards**

Housing age is the key variable used to estimate the number of housing units with lead-based paint (LBP). Starting in 1978, the federal government prohibited the use of LBP on residential property. Housing constructed prior to 1978, however, is at-risk of containing LBP. According to the 2013-2017 ACS, an estimated 3,385 units (representing 19 percent of the housing stock) in the City were constructed prior to 1980.

The potential for housing to contain LBP varies depending on the age of the housing unit. National studies estimate that 75 percent of all residential structures built prior to 1970 contain LBP. Housing built prior to 1940, however, is much more likely to contain LBP (estimated at 90 percent of housing units). About 62 percent of housing units built between 1960 and 1979 are estimated to contain LBP. Table II.17 estimates the number of housing units in Perris containing LBP, utilizing the assumptions outlined above. It should be noted, however, that not all units with LBP present a hazard. Properties most at risk include structures with deteriorated paint, chewable paint surfaces, friction paint surfaces, and deteriorated units with leaky roofs and plumbing.



Table II.17: Lead-Based Paint Estimates (2013-2017)

Year Built	F	Percent	Estimated No. of
Teal Dull	Units	With LBP	Units with LBP
1960-1979	2,514	62% <u>+</u> 10%	1,559 ± 251
1940-1959	725	80% <u>+</u> 10%	580 ± 73
Before 1940	146	90% <u>+</u> 10%	131 ± 15
Total Units	3,385	62% <u>+</u> 10%	2,099± 339

Source: US American Community Survey, 2013-2017.

The County of Riverside Childhood Lead Poisoning Prevention Program (CLPPP) was established in 1991, as a result of the California legislature mandating that the California Department of Health Services (CDHS) develop and enact a standard of care for identifying and managing children with elevated blood lead levels. CLPPP, funded by the CDHS, is operated by the County of Riverside Department of Public Health. The Riverside CLPPP team includes public health nurses, health educators, epidemiology staff, and registered environmental health specialists. The team works closely together to ensure nursing and environmental case management and follow-up for lead-burdened children; to promote screening; and to carry out primary prevention, targeted outreach and education, and surveillance activities. The Riverside County CLPPP does not identify Perris as a high risk area for lead poisoning.

The City of Perris is committed to reducing lead-based paint hazards citywide with an emphasis on housing units occupied by low and moderate income households. The City continues to support Department of Housing and Urban Development (HUD) and Environmental Protection Agency (EPA) efforts to disseminate public information on the health dangers of lead-based paint. The City proactively disseminates information on lead hazards and new regulations to its Housing Staff, community based organizations, nonprofit organizations, and other public agencies that receive CDBG funds. The City also participates in and supports the regional lead poisoning prevention program administered by the County of Riverside Department of Public Health.

# F. Housing Cost and Affordability

Many housing problems, such as housing overpayment (cost burden) or overcrowding, are directly related to the cost of housing in a community. If housing costs are high relative to household income, a correspondingly high rate of housing problems exists. This section evaluates the affordability of the housing stock in Perris to low and moderate income households. It is important to note, however, that housing affordability alone is not necessarily a fair housing issue. Only when housing affordability issues interact with other factors covered under fair housing laws, such as household type, composition, and race/ethnicity do fair housing concerns arise.



## 1. Ownership Housing Costs

The Perris housing market was significantly affected by the market collapse and economic downturn of 2008 and home prices in the City and the region are still recovering. Figure II.5 compares the median sales price of single-family homes in Perris and surrounding jurisdictions in November 2017 and 2018.

Overall, home prices in the region have remained fairly stable since 2017. In November 2018, the median sales price of a single-family home in Perris was \$325,000, compared to \$317,500 in November 2017. As shown in Figure II.5, the value of for-sale housing in 2018 in Perris was average when compared to neighboring jurisdictions.



Figure II.5: Median Home Prices (2017-2018)

 $Source: Dataquick\ Services,\ CoreLogic.com,\ January\ 2019.$ 

## 2. Rental Housing Costs

Information on current rental rates in the City was obtained through a review of advertisements on Craigslist from January 2019. Available rental housing ranged from single room studio apartments to five-bedroom single-family homes. The majority of available units in the City were three- and four-bedroom single-family homes. Only 16 percent of the rental advertisements surveyed were for apartment units. Table II.18 summarizes average apartment rents by unit size. Overall, 60 units of varying sizes were listed as available for rent in January 2019 for an average rent of \$1,658.



Table II.18: Average Apartment Rents in Perris (January 2019)

Size	Number Advertised	Median Rent	Average Rent	Rent Range
Studio	6	\$550	\$533	\$400 - \$550
One Bedroom	4	\$1,030	\$1,021	\$925 - \$1,100
Two Bedroom	5	\$1,650	\$1,595	\$1,350 - \$1,900
Three Bedroom	19	\$1,890	\$1,768	\$900 - \$2,100
Four+ Bedroom	26	\$1,993	\$1,947	\$950 - \$2,290
Total	60	\$1,870	\$1,658	\$400 - \$2,290

Source: Craigslist.org, search performed in January 2019.

## 3. Housing Affordability

Housing affordability can be inferred by comparing the cost of renting or owning a home in a community with the maximum affordable housing costs for households at different income levels. Taken together, this information can generally show who can afford what size and type of housing and indicate the type of households most likely to experience overcrowding and overpayment. While housing affordability alone is not a fair housing issue, fair housing concerns may arise when housing affordability interacts with factors covered under the fair housing laws, such as household type, composition, and race/ethnicity.

The federal Department of Housing and Urban Development (HUD) conducts annual household income surveys nationwide to determine a household's eligibility for federal housing assistance. Households in the lower end of each category can afford less by comparison than those at the upper end. Table II.19 displays annual household income by household size and the maximum affordable housing payment for households at different income levels, based on the standard of 30 to 35 percent of household income. General cost assumptions for utilities, taxes, and property insurance are also shown.

Based on the affordable rents and ownership costs, most lower and moderate income households in Perris would not be able to affordable adequate sized housing without assuming a cost burden.



Table II.19: Housing Affordability Matrix – Riverside County

Haveshald	Annual	Affordak	le Costs	Uti	lities	Taxes and	Affordable	Affordable
Household	Income	Renters	Owners	Renters	Owners	Insurance	Rent	Home Price
Extremely Low	Income (under	30% AMI)						
1-Person	\$17,950	\$354	\$354	\$115	\$197	\$124	\$185	\$7,666
2-Person	\$20,500	\$412	\$412	\$127	\$220	\$144	\$211	\$11,049
3-Person	\$23,050	\$520	\$520	\$161	\$247	\$182	\$230	\$21,103
4-Person	\$25,600	\$628	\$628	\$194	\$285	\$220	\$247	\$28,597
5-Person	\$28,410	\$736	\$736	\$187	\$326	\$257	\$254	\$35,393
Low Income (3	1 to 50% AMI)							
1-Person	\$23,600	\$590	\$590	\$115	\$197	\$207	\$418	\$43,405
2-Person	\$27,000	\$675	\$675	\$127	\$220	\$236	\$478	\$50,911
3-Person	\$30,350	\$759	\$759	\$161	\$247	\$266	\$531	\$57,296
4-Person	\$33,700	\$843	\$843	\$194	\$285	\$295	\$582	\$61,122
5-Person	\$36,400	\$910	\$910	\$187	\$326	\$319	\$615	\$61,791
Moderate Inco	me (51 to 80% A	AMI)						
1-Person	\$37,750	\$691	\$806	\$115	\$197	\$282	\$771	\$76,089
2-Person	\$43,150	\$790	\$921	\$127	\$220	\$322	\$881	\$88,155
3-Person	\$48,550	\$888	\$1,036	\$161	\$247	\$363	\$983	\$99,291
4-Person	\$53,900	\$987	\$1,152	\$194	\$285	\$403	\$1,084	\$107,867
5-Person	\$58,250	\$1,066	\$1,244	\$187	\$326	\$435	\$1,158	\$112,260
Median Income	e (81 to 100% A	MI)						
1-Person	\$46,050	\$1,036	\$1,209	\$115	\$197	\$423	\$970	\$137,057
2-Person	\$52,650	\$1,184	\$1,382	\$127	\$220	\$484	\$1,108	\$157,834
3-Person	\$59,200	\$1,332	\$1,555	\$161	\$247	\$544	\$1,240	\$177,679
4-Person	\$65,800	\$1,481	\$1,727	\$194	\$285	\$605	\$1,369	\$194,965
5-Person	\$71,050	\$1,599	\$1,865	\$187	\$326	\$653	\$1,465	\$206,326
Above Modera	te Income (100	to 120% AMI)						
1-Person	\$55,250	\$1,267	\$1,478	\$115	\$197	\$517	\$1,197	\$177,703
2-Person	\$63,150	\$1,448	\$1,689	\$127	\$220	\$591	\$1,368	\$204,286
3-Person	\$71,050	\$1,629	\$1,900	\$161	\$247	\$665	\$1,532	\$229,938
4-Person	\$78,950	\$1,810	\$2,111	\$194	\$285	\$739	\$1,694	\$253,030
5-Person	\$85,250	\$1,954	\$2,280	\$187	\$326	\$798	\$1,816	\$269,037

Assumptions: 2018 income limits; 30.0% gross household income as affordable housing cost; 20.0% of monthly affordable cost for taxes and insurance; 10.0% downpayment; and 4.0% interest rate for a 30-year fixed-rate mortgage loan. Utilities based on Housing Authority of the County of Riverside utility allowances.

Sources: HCD (2018); Housing Authority of the County of Riverside utility allowances (2018); and Veronica Tam and Associates (2019).



## G. Housing Problems

A continuing priority of communities is enhancing or maintaining the quality of life for residents. HUD assesses housing need within a community according to several criteria: (1) the number of households that are paying too much for housing; (2) the number of households living in overcrowded units; and (3) the number of households living in substandard housing conditions. Table II.9, presented earlier on page 17 summarizes the extent of households facing some kind of housing problems. CHAS data provide further details on housing cost burden and overcrowding. These conditions are discussed below.

## 1. Overcrowding

Some households may not be able to accommodate high cost burdens for housing, but may instead accept smaller housing or reside with other individuals or families in the same home. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding.

In general, "overcrowding" is defined as a housing unit occupied by more than one person per room (including living and dining rooms but excluding kitchen and bathrooms). Moderate overcrowding refers to 1.0 to 1.5 persons per room and severe overcrowding occurs when a home has 1.5 or more occupants per room. Household overcrowding is reflective of various living situations: (1) a family lives in a home that is too small; (2) a family chooses to house extended family members; or (3) unrelated individuals or families are doubling up to afford housing. Not only is overcrowding a potential fair housing concern, it can strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes.

According to the 2013-2017 ACS, approximately 12 percent of Perris households experienced overcrowding, with approximately three percent experiencing severe overcrowding. Overcrowding was more prevalent among renters, with nearly 20 percent of renters living in overcrowded units, compared to just 12 percent of homeowners. Overcrowding has decreased in Perris since 2000, when 26 percent of total households lived in overcrowded conditions.

# 2. Housing Cost Burden

Housing cost burden or overpayment is an important issue for Perris residents. According to the federal government, any housing condition where a household spends more than 30 percent of income on housing is considered overpayment. A cost burden of 30 to 50 percent is considered moderate overpayment; payment in excess of 50 percent of income is considered severe overpayment. Overpaying is an important housing issue because paying too much for housing leaves less money available for emergency expenditures.

According to 2011-2015 CHAS data, housing cost burden affects renter-households (58 percent) and owner-households (59 percent) in Perris equally. Renter-households (30 percent) were slightly more likely than owner-households (22 percent) to experience severe housing cost burden. Housing overpayment is typically linked to household income since cost burden generally occurs when housing costs increase faster than income.



## H. Assisted Housing

To further fair housing in Perris, 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, 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.

## 1. Housing Choice Voucher (Section 8) Rental Assistance

The Housing Choice Voucher program (more commonly known as Section 8) is a rent subsidy program that helps lower income families and seniors pay rents of private units. Section 8 tenants pay a minimum of 30 percent of their income for rent and the local housing authority pays the difference up to the payment standard established by the Housing Authority. The program offers lower-income households the opportunity to obtain affordable, privately owned rental housing and to increase their housing choices. The Housing Authority establishes payment standards based on HUD Fair Market Rents (FMRs). The owner's asking price must be supported by comparable rents in the area.

### **Voucher Recipients**

The Housing Authority of the County of Riverside (HACR) administers the Housing Choice Voucher Program for the City of Perris. As of January 2019, 489 Perris households were receiving vouchers through HCV. The demographics of HCV participants are provided in Table II.20. Black households (59 percent) comprised the majority of voucher recipients, followed by White households (39 percent). Approximately 76 percent of voucher recipients in the City identified themselves as ethnically Hispanic. As shown, about 38 percent of voucher recipients had a disability. Almost a quarter of all voucher recipients (24 percent) were elderly, and about four percent were veterans.



Table II.20: Race/Ethnicity of HCV Recipients (2019)

Race/Ethnicity	# of HCV Recipients	% of HCV Recipients
Race*		
American Indian	5	1.0%
Asian or Pacific Islander	6	1.2%
Black	288	58.9%
White	190	38.9%
Other	0	0.0%
Total	489	100.00%
Ethnicity		
Hispanic	120	24.5%
Non-Hispanic	369	75.5%
Total	489	100.0%
Household Type		
Disabled	188	38.4%
Elderly	115	23.5%
Veteran	18	3.7%

Note: \*= Data provided by HACR does not indicate race of recipients by ethnicity. Race estimates represent both Hispanic and non-Hispanic recipients.

Source: Bureau of the Census, 2010 and Housing Authority of the County of Riverside (HACR), January 2019.

## 2. Assisted Housing Projects

Publicly subsidized affordable housing provides the largest supply of affordable housing in most communities. Apartment projects can receive housing assistance from a variety of sources to ensure that rents are affordable to lower-income households. In exchange for public assistance, owners are typically required to reserve a portion or all of the units as housing affordable to lower-income households.

There are currently four affordable rental housing developments for seniors located in the City, providing 308 affordable units to lower-income elderly households. There are also five affordable rental housing developments providing 334 affordable units to family households. One development offers 74 affordable units to families and those with mental disabilities. In total, there are 716 affordable units for lower income family and senior households in Perris.

As in typical urban environments throughout the country, however, areas designated for high density housing in the City are usually adjacent to areas designated for commercial and industrial uses. Lower and moderate income households tend to live in high density areas, where the lower land costs per unit (i.e. more units on a piece of property) can result in lower development costs and associated lower housing payments. Therefore, the location of publicly assisted housing is partly the result of economic feasibility. The locations of assisted housing projects are identified in Figure II.6. As shown, most senior and affordable housing developments are concentrated near the center of the City and within reach of multiple transit routes and bus stops.



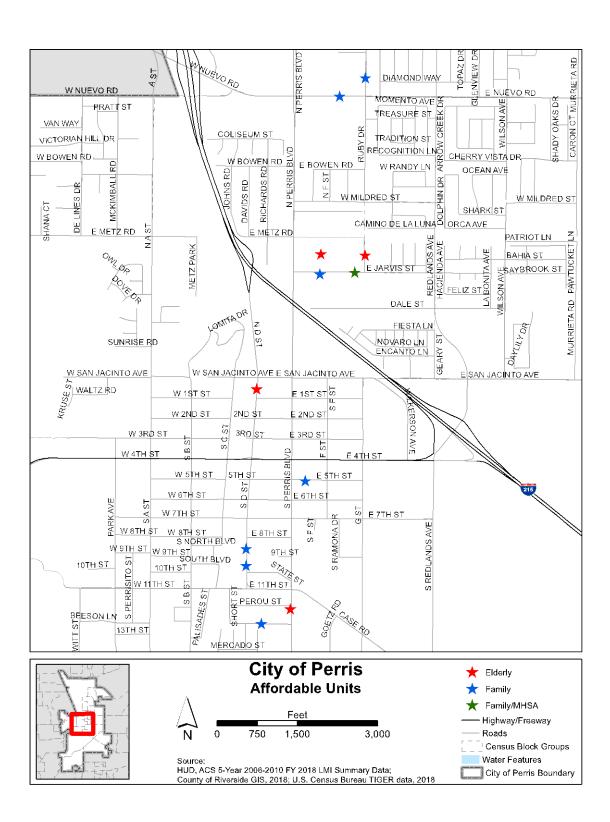
Table II.21: Assisted Rental Housing in Perris (2019)

Project Name	Tenant Type	Total Units	# of Affordable Units	Financing Program
Meadowview Apartments I 1640 Ruby Drive	Family	88	87	Category 7B: Affordable Housing Subsidized
Meadowview Apartments II 150 Nuevo Rd.	Family	76	75	HFDA/8 NC
Mercado Apartments 832 South D St. Perris, CA 92570	Family	59	59	Category 7A: Affordable Housing with Tax Credit Financing
Perris I	Family	4	4	Category 7A: Affordable Housing with Tax Credit Financing
Perris Family Apartments Jarvis St. and Ruby Rd	Family/MHSA	75	74	Affordable Housing with Tax Credit Financing
Perris Park 1204 S Perris Blvd	Elderly	80	79	Category 7A: Affordable Housing with Tax Credit Financing
Perris Station Apartments 24 S. D Street	Elderly	84	83	Category 7A: Affordable Housing with Tax Credit Financing
San Jacinto Vista I 202 E Jarvis St.	Elderly	86	86	Category 7A: Affordable Housing with Tax Credit Financing/ Category 7B: Affordable Housing Subsidized
San Jacinto Vista II 202 E Jarvis St.	Elderly	60	60	Category 7B: Affordable Housing Subsidized
Vintage Woods Apartments 87 East Jarvis St.	Family	70	70	Category 7A: Affordable Housing with Tax Credit Financing
Verano Apartments 904 South D Street	Family	40	39	Affordable Housing with Tax Credit Financing
Tota	ıl		716	

Source: City of Perris, 2019.



Figure II.6: Location of Affordable Housing





## 3. Licensed Community Residential Care Facilities

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

According to the State of California Community Care Licensing Division of the State's Department of Social Services, as of January 2019, there were 12 State-licensed community care facilities, with a total capacity of 282 beds/persons, in Perris (Table II.22). The locations of these facilities are shown in Figure II.7. As shown, residential care facilities are distributed throughout the City.

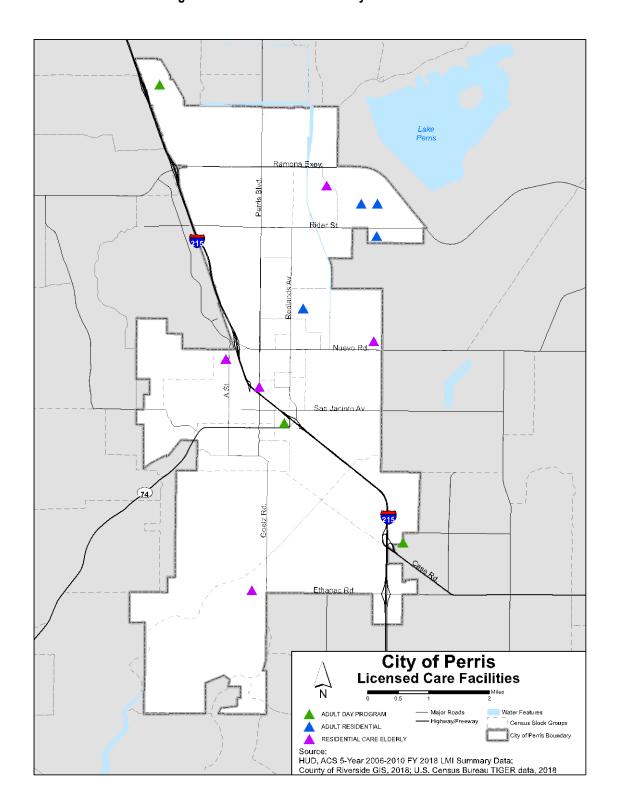
Table II.22: Licensed Community Residential Care Facilities by Type

Туре	Number of Facilities	Total Capacity
Adult Day Care	5	200
Adult Residential Facility	4	21
Residential Care for the Elderly	3	61
Total	12	282

Source: State of California Department of Social Services, Community Care Licensing Division, 2019.



Figure II.7: Location of Community Care Facilities





## 4. Disparities in Access to Opportunity

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 Perris. Table 29 provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices:

- Low Poverty Index: The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. The higher the score, the less exposure to poverty in a neighborhood.
- School Proficiency Index: The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the score, the higher the school system quality is in a neighborhood.
- Labor Market Engagement Index: 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.
- Transit Trips Index: This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.
- Low Transportation Cost Index: This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the index, the lower the cost of transportation in that neighborhood.
- Jobs Proximity Index: The jobs proximity index 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.
- Environmental Health Index: The 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, where a neighborhood is a census block-group.



As shown in Table II.23, in Perris, Native American and Hispanic residents were more likely (compared to other racial/ethnic groups) to be impacted by poverty, limited access to proficient schools, lower labor participation rate and more likely to utilize public transportation.



Table II.23: Opportunity Indicators by Race/Ethnicity (AFFHT Table 12)

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City of Perris	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, non-Hispanic	30.85	46.09	16.34	37.43	19.83	38.57	45.78
Black, non-Hispanic	27.87	44.31	13.32	41.40	22.61	30.43	42.22
Hispanic	22.85	42.57	11.31	41.10	23.57	35.19	41.79
Asian or Pacific Islander, non-Hispanic	33.36	52.40	16.13	38.92	19.87	28.01	45.79
Native American, non- Hispanic	21.28	33.10	11.53	41.24	24.73	38.71	38.79
Population below federal po	verty line						
White, non-Hispanic	19.18	41.36	11.24	37.77	23.02	40.68	43.18
Black, non-Hispanic	22.73	39.91	9.38	44.99	25.11	31.63	40.20
Hispanic	16.12	36.32	7.94	43.27	26.76	38.56	37.65
Asian or Pacific Islander, non-Hispanic	19.59	30.36	11.10	43.75	29.74	42.01	28.42
Native American, non- Hispanic	15.57	60.08	8.55	36.35	22.87	44.29	45.45

Note: American Community Survey Data are based on a sample and are subject to sampling variability.

Source: AFFHT Data Table 12; Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA



# **III.** Lending Practices

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent tightening of lending/credit markets. This chapter 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.

## A. Background

## 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**

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.

### **Financial Stability Act**

The Financial Stability Act of 2009 established the Making Home Affordable Program, which assists eligible homeowners who can no longer afford their home with mortgage loan modifications and other options, including short sale or deed-in-lieu of foreclosure. The program is targeted toward homeowners facing foreclosure and homeowners who are unemployed or "underwater" (i.e., homeowners who owe more on their mortgage than their home is worth).

### **Helping Families Save Their Homes Act**

The Helping Families Save Their Homes Act was passed by Congress in May 2009 and expands the Making Home Affordable Program. This Act includes provisions to make mortgage assistance and foreclosure prevention services more accessible to homeowners and increases protections for renters living in foreclosed homes. It also establishes the right of a homeowner to know who owns their mortgage and provides over two billion dollars in funds to address homelessness. Under this bill, tenants also have the right to stay in their homes after foreclosure for 90 days or through the term of their lease.

### Fraud Enforcement and Recovery Act

The Fraud Enforcement and Recovery Act (FERA) enhances the criminal enforcement of federal fraud laws by strengthening the capacity of federal prosecutors and regulators to hold accountable those who have committed fraud. FERA amends the definition of a financial institution to include private mortgage brokers and non-bank lenders that are not directly regulated or insured by the federal government, making them liable under federal bank fraud criminal statutes. The new law also makes it illegal to make a materially false statement or to willfully overvalue a property in order to manipulate the mortgage lending business.

## B. Overall Lending Patterns

# 1. Data and Methodology

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, whether financed at market rate or with government assistance.

HMDA data is 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 analyses of HMDA data presented in this AI were conducted using Lending Patterns <sup>TM</sup>. Lending Patterns is a web-based data exploration tool that analyzes lending records to produce reports on various aspects of mortgage lending. It analyzes HMDA data to assess market share, approval rates, denial rates, low/moderate income lending, and high-cost lending, among other aspects.



Table III.1 summarizes the disposition of loan applications submitted to financial institutions in 2012 and 2017 (most recent HMDA data available) for home purchase, refinance, and home improvement loans in Perris. Included is information on loan applications that were approved and originated, approved but not accepted by the applicant, denied, withdrawn by the applicant, or incomplete. As indicated in Table III.1, overall between 2012 and 2017 there was an increase of over 1,000 applicants. The average loan approval among all loan types decreased slightly though from 63 percent in 2012 to approximately 58 percent in 2017.

Table III.1: Disposition of Home Loans (2012 and 2017)

Loop Type	Total Ap	Total Applicants		Percent Approved		Percent Denied		Percent Other	
Loan Type	2012	2017	2012	2017	2012	2017	2012	2017	
Conventional Purchase	533	967	69.6%	69.5%	16.1%	13.9%	14.3%	16.6%	
Government-Backed Purchase	1,053	1,175	69.1%	72.8%	16.1%	10.9%	14.7%	16.3%	
Home Improvement	134	392	30.6%	43.4%	64.2%	38.8%	5.2%	17.9%	
Refinancing	2,763	3,024	61.2%	49.7%	19.9%	20.4%	19.0%	29.9%	
Total	4,483	5,558	63.1%	57.6%	19.9%	18.5%	17.0%	23.9%	

Source: www.lendingpatterns.com, 2019.

### 2. Home Purchase Loans

In 2017, a total of 967 households applied for conventional loans to purchase homes in the City, a dramatic 81 percent increase from 2012. Approval rates for conventional loans have remained steady at around 70 percent percent since 2012.

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 a 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 also 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. About 1,200 Perris households applied for government-backed loans in 2017. The approval rates for these loans were only slightly lower than for conventional home purchase loans. Of the Government-backed loan applications, approximately 73 percent were approved and 11 percent were denied.

# 3. 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's equity represents a higher risk.

In 2017, 392 applications for home improvement loans were submitted in the City. Of these applications, 43 percent were approved and 39 percent were denied. Home improvement financing in Perris was much less active in 2012, when only 134 applications for home improvement loans were filed, with a lower approval rate of 31 percent.

## 4. Refinancing

Homebuyers will often 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.

The majority of loan applications submitted in the City in 2017 were for refinancing existing home loans (3,024 applications). About 50 percent of these applications were approved, while 20 percent were denied. As with the other loan types, refinance lending was less active in 2012 (2,763 applications). Approval rates for these loans decreased between 2012 and 2017, from 61 percent to 50 percent.

# C. 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 or not these rates vary by other factors, such as race/ethnicity.

Ideally, the applicant pool for mortgage lending should be reflective of the demographics of a municipality. When one racial/ethnic group is overrepresented or underrepresented in the total applicant pool, it could be an indicator of a possible fair housing issue. Such a finding may be a sign that access to mortgage lending is not equal for all individuals. As shown in Table III.2, White applicants were overrepresented in the applicant pool in 2017, while Hispanic applicants were significantly underrepresented.

Table III.2: Demographics of Loan Applicants vs. Total Population (2017)

	Percent of Applicant Pool	Percent of Total Population	Variation (Percentage Points)
White	23.9%	11.0%	12.9%
Black	8.5%	11.4%	-2.9%
Hispanic	50.2%	71.8%	-21.6%
Asian	3.8%	3.3%	0.5%

Note: Percent of total population estimates are based on 2017 applicant data and compared to total population estimates from the 2010 Census.

Source: Bureau of the Census, 2010; www.lendingpatterns.com, 2019.



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 III.3 below summarizes lending outcomes by race/ethnicity and income in the City. In Perris, at the upper income level, approval rates were generally comparable among different groups. However, for lower income households, Black applicants had the lowest approval rates, while White applicants had the highest approval rates in 2017.

Table III.3: Lending Patterns by Race/Ethnicity (2012 and 2017)

	Appr	oved	Dei	nied	Withdrawn	/Incomplete
	2012	2017	2012	2017	2012	2017
White						
Low (0-49% AMI)	53.8%	44.3%	32.8%	36.7%	13.4%	19.0%
Moderate (50-79% AMI)	76.1%	53.8%	11.8%	20.5%	12.2%	25.6%
Middle (80-119% AMI)	73.8%	68.8%	12.9%	12.2%	13.3%	19.0%
Upper (≥120% AMI)	68.3%	64.7%	15.7%	12.8%	15.9%	22.5%
Black						
Low (0-49% AMI)	60.9%	14.3%	30.4%	71.4%	8.7%	14.3%
Moderate (50-79% AMI)	74.0%	29.6%	12.0%	38.9%	14.0%	31.5%
Middle (80-119% AMI)	67.2%	57.1%	17.2%	19.3%	15.5%	23.6%
Upper (≥120% AMI)	58.9%	61.2%	23.3%	19.6%	17.8%	19.2%
Hispanic						
Low (0-49% AMI)	57.2%	36.4%	27.6%	34.1%	15.2%	29.5%
Moderate (50-79% AMI)	64.6%	49.6%	20.2%	27.8%	15.2%	22.5%
Middle (80-119% AMI)	62.8%	62.1%	20.8%	15.5%	16.4%	22.4%
Upper (≥120% AMI)	64.2%	66.7%	18.2%	13.4%	17.6%	19.8%
Asian						
Low (0-49% AMI)	56.5%	23.1%	30.4%	53.8%	13.0%	23.1%
Moderate (50-79% AMI)	63.4%	68.2%	22.0%	18.2%	14.6%	13.6%
Middle (80-119% AMI)	61.2%	61.5%	28.6%	15.4%	10.2%	23.1%
Upper (≥120% AMI)	72.7%	65.1%	18.2%	12.3%	9.1%	22.6%

Source: www.lendingpatterns.com, 2019.



## D. Lending Patterns by Census Tract Characteristics

#### 1. 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>3</sup>

- Low-Income Tract Tract Median Income ≤ 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 ≥120 percent AMI

Only a small proportion of the census tracts within the City of Perris were categorized as Low Income by HMDA in 2012 and 2017 (three percent and five percent of the applications, respectively). The majority of loan applications submitted by Perris residents were from the City's middle income tracts. Table III.4 summarizes the loan outcomes of census tracts by income level in 2012 and 2017. In general, home loan approval rates increased and denial rates decreased as the income level of the census tract increased. Higher income households are more likely to qualify for and be approved for loans, so this trend is to be expected.

Table III.4: Outcomes Based on Census Tract Income (2012 and 2017)

Tract Income	Total Ap	Total Applicants		Approved		nied	Other	
Level	#	%	#	%	#	%	#	%
2012								
Low	138	3.1%	68	49.3%	44	31.9%	26	18.8%
Moderate	1,060	23.6%	617	58.2%	245	23.1%	198	18.7%
Middle	2,857	63.7%	1,857	65.0%	532	18.6%	468	16.4%
Upper	428	9.5%	288	67.3%	70	16.4%	70	16.4%
Total	4,483	100.0%	2,830	63.1%	891	19.9%	762	17.0%
2017								
Low	259	4.7%	128	49.4%	56	21.6%	75	29.0%
Moderate	2,314	41.6%	1311	56.7%	432	18.7%	571	24.7%
Middle	2,985	53.7%	1760	59.0%	543	18.2%	682	22.8%
Upper	0	0.0%	0		0		0	
Total	5,558	100.0%	3,199	57.6%	1,031	18.5%	1,328	23.9%

Source: www.lendingpatterns.com, 2019.

These income definitions are different from those used by HUD to determine Low and Moderate Income Areas.



## 2. Minority Population

HMDA also provides data on the minority population percentage within each census tract. Table III.5 summarizes the loan outcomes of census tracts, by proportion of minority residents, during 2012 and 2017. A census tract with more than 50 percent minority population is considered "substantially minority." In general, the approval rates are comparable in neighborhoods that were considered substantially minority versus those that were not.

Table III.5: Outcomes Based on Minority Population of Census Tract (2012 and 2017)

Tract Income Level	-	Total Applicants		Approved		Denied		Other	
	#	%	#	%	#	%	#	%	
2012									
Substantially Minority	3,728	83.2%	2,309	61.9%	763	20.5%	656	17.6%	
Not Substantially Minority	755	16.8%	521	69.0%	128	17.0%	106	14.0%	
Total	4,483	100.0%	2,830	63.1%	891	19.9%	762	17.0%	
2017									
Substantially Minority	5,114	92.0%	2,930	57.3%	971	19.0%	1,213	23.7%	
Not Substantially Minority	444	8.0%	269	60.6%	60	13.5%	115	25.9%	
Total	5,558	100.0%	3,199	57.6%	1,031	18.5%	1,328	23.9%	

Source: www.lendingpatterns.com, 2019.

# E. Major Lenders

In 2017, the top ten mortgage lenders in the City of Perris received approximately 30 percent of all loan applications. Among these lenders, Wells Fargo, Broker Solutions, and Freedom Mortgage Corporation received the most applications — about 14 percent of the total market share. Table III.6 summarizes the top lenders in the City as well as their underwriting outcomes in 2012 and 2017.

Under current banking regulations, lenders are required to hold a given interest rate for a borrower for a period of 60 days. Borrowers, however, are under no obligation to actually follow through on the loan during this time and can withdraw their application. In mortgage lending, fallout refers to a loan application that is withdrawn by the borrower before the loan is finalized.

Closed applications refer to applications that are closed by the lender due to incompleteness. In instances where a loan application is incomplete, lenders are required to send written notification to the applicant and request the missing information be turned over within a designated timeframe. If this notice is given and the applicant does not comply within the specified time, the lender can close the application for incompleteness. A high rate of incomplete loans can indicate a lack of financial literacy on the part of the borrower. Several studies have correlated financial literacy with a borrower's income level. Specifically, lower income individuals were the least knowledgeable about finance.<sup>4</sup> Insufficient lender assistance during the application process can also lead to high levels of incomplete applications.

<sup>4</sup> Collins, Michael. "Education Levels and Mortgage Application Outcomes: Evidence of Financial Literacy." University of Wisconsin-Madison, Department of Consumer Science, (2009).



Often, different lenders focus on different markets/populations. In 2017 for Black applicants, the top lenders were Quicken Loans, Mountain West Financial, First Mortgage Corporation, and Pennymac Loan Services. Two of the top ten lenders in the City were also top lenders for Hispanics.

Table III.6: Top Lenders (2012 and 2017)

	Overall Market Share		Approved		Denied		Withdrawn or Closed	
	2012	2017	2012	2017	2012	2017	2012	2017
Wells Fargo Bank	22.0%	6.9%	30.5%	21.9%	14.7%	30.0%	15.2%	11.2%
Broker Solutions, Inc.		4.3%		53.6%		10.7%		35.7%
Freedom Mortgage Corp.		3.1%		28.0%		6.5%		32.5%
Nationstar Mortgage		3.0%		22.3%		12.7%		59.9%
Quicken Loans, Inc.	1.9%	2.9%	83.7%	65.6%	5.8%	24.9%	10.6%	9.5%
Pennymac Loan Services, LLC		2.4%		14.0%		12.7%		8.3%
Pulte Mortgage, LLC		2.3%		59.5%		27.5%		13.1%
Shore Mortgage		2.3%		74.3%		9.9%		15.8%
Loandepot.com		2.3%		56.5%		19.7%		23.8%
Excel Mortgage Servicing, Inc.		2.2%		50.4%		20.6%		22.0%
Other Lenders	49.8%	68.4%	48.0%	47.8%	17.3%	14.5%	20.6%	24.0%
All Lenders	5,580	6,521	2,605	2,985	891	1,031	987	1,543

Source: www.lendingpatterns.com, 2019.

Note: The table identifies the top ten lenders of 2017. Some of these lenders were not top lenders in 2012 and market share data is not available. Furthermore, not all top lenders from 2012 are identified above.

# F. Subprime Lending

According to the Federal Reserve, "prime" mortgages are offered to persons with excellent credit and employment history and income adequate to support the loan amount. "Subprime" loans are loans to borrowers who have less-than-perfect credit history, poor employment history, or other factors such as limited income. By providing loans to those who do not meet the critical standards for borrowers in the prime market, subprime lending can and does serve a critical role in increasing levels of homeownership. Households that are interested in buying a home but have blemishes in their credit record, insufficient credit history, or non-traditional income sources, may be otherwise unable to purchase a home. The subprime loan market offers these borrowers opportunities to obtain loans that they would be unable to realize in the prime loan market.

Subprime lenders generally offer interest rates that are higher than those in the prime market and often lack the regulatory oversight required for prime lenders because they are not owned by regulated financial institutions. In recent years, however, many large and well-known banks became involved in the subprime market either through acquisitions of other firms or by initiating subprime loans directly. Though the subprime market usually follows the same guiding principles as the prime market, a number of specific risk factors are associated with this market.



Subprime lending can both impede and extend fair housing choice. On the one hand, subprime loans extend credit to borrowers who potentially could not otherwise finance housing. The increased access to credit by previously underserved consumers and communities contributed to record high levels of homeownership among minorities and lower-income groups. On the other hand, these loans left many lower income and minority borrowers exposed to default and foreclosure risk. Since foreclosures destabilize neighborhoods and subprime borrowers are often from lower-income and minority areas, mounting evidence suggests that classes protected by fair housing faced the brunt of the recent subprime and mortgage lending market collapse.<sup>5</sup>

While HMDA data does not classify loans as subprime, it does track the interest rate spread on loans. An interest rate spread refers to the difference between two related interest rates. For HMDA data, spread specifically refers to the difference between the annual percentage rate (APR) for a loan and the yield on a comparable-maturity Treasury security.

The frequency of loans with reported spread has increased substantially since 2012. About four percent of loans in 2012 had a reported spread, but by 2017, about 11 percent of loans reported a spread. As the incidence of subprime loans has increased overall, Blacks and Hispanics continue to be most likely to receive subprime loans than other race/ethnic groups. However, the discrepancies between prime versus subprime rates have generally narrowed for all race groups.

Table III.7: Reported Spread on Loans by Race/Ethnicity (2012-2017)

	Frequenc	y of Spread	Average Spread			
	2012	2017	2012	2017		
White	2.7%	7.9%	2.87	2.49		
Black	6.5%	12.2%	3.18	1.99		
Hispanic	4.9%	12.9%	2.55	1.85		
Asian	2.4%	6.9%	2.14	2.03		
Total	4.0%	10.6%	2.73	2.02		

Source: www.lendingpatterns.com, 2019.

Foreclosure Exposure: A Study of Racial and Income Disparities in Home Mortgage Lending in 172 American Cities. Association of Community Organizations for Reform Now. September 2007.



## IV. Public Policies and Practices

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, and an assessment of public policies and practices enacted by jurisdictions within the City of Perris can help determine potential impediments to fair housing opportunity. This section presents an overview of government regulations, policies, and practices enacted by the City that may impact fair housing choice.

# A. Policies and Programs Affecting Housing Development

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 seven State-mandated General Plan elements – Housing and Land Use Elements – have a 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. The Perris General Plan Housing Element and other elements, Zoning Code, Consolidated Plan, and other documents have been reviewed to evaluate the following potential impediments to fair housing choice and affordable housing development:

- Local zoning, building, occupancy, and health and safety codes
- Public policies and building approvals that add to the cost of housing development
- Moratoriums or growth management plans
- Residential development fees
- Administrative policies affecting housing activities or community development resources for areas of minority concentration, or policies that inhibit employment of minorities or individuals with disabilities
- Community representation on planning and zoning boards and commissions

# 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 low and moderate income households;
- Address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing;
- Conserve and improve the condition of the existing affordable housing stock; and
- Promote housing opportunities for all persons.

#### 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, the City of Perris adopted a Housing Element in August 2013 that was found to be in full compliance with State law for the 2014-2021 planning period.

#### 2. General Plan Land Use Element

A number of 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. 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.

Higher-density housing also reduces land costs on a per-unit basis and thus facilitates the development of affordable housing. Restrictive zoning that requires unusually large lots and building size can substantially increase housing costs and impede housing production. Reasonable density standards ensure the opportunity for higher-density residential uses to be developed within a community, increasing the feasibility of producing affordable housing. While housing affordability alone is not a fair housing issue, many low- and moderate-income households are disproportionately concentrated in groups protected under the fair housing laws, such as persons with disabilities and minorities. When the availability of affordable housing is limited, indirectly affecting the housing choices available to groups protected by fair housing laws, fair housing concerns may arise.

The Perris General Plan provides for nine residential land use designations and two zoning Overlays that allow residential land uses on land not zoned for residential use, including commercial zones. Table IV.1 summarizes the residential land use designations in the City.

While the City's various land use designations provide opportunities for a variety of housing types, none of the land use categories have established minimum densities. Given the limited availability of high density multi-family residential land in Perris, the absence of minimum densities may make it more difficult for the City to efficiently utilize this land. As part of the City's 2014-2021 Housing Element update, the City committed to establishing a minimum density of 30 units per acre on Sites A through L in the Housing Element as well as exclusively residential Urban Village district sites identified in Map 4 of Appendix A of the Housing Element (Action 2.11). The City also commits to developing an evaluation mechanism to track development on these sites to ensure the minimum density is reached or replacement sites be identified.



Table IV.1: Residential Land Use Designations

General Plan Land Use Category	Corresponding Zone Districts	Max. Densities	Typical Residential Types
R-20,000 Single-Family Residential, 20,000 sq. ft. lot	R-20,000 Single-Family Residential, 20,000 square foot minimum lots	Up to 2 units per acre	Comprised of low-density, single-family dwelling units in a semi-rural or agricultural setting. Other permitted uses include churches and schools. This designation allows for single-family residential dwellings.
R-10,000 Single-Family Residential, 10,000 sq. ft. lot	R-10,000 Single-Family Residential, 10,000 square foot minimum lots	Up to 4 units per acre	Comprised of low-density, single-family residential dwellings.
R-8,400 Single-Family Residential, 9,400 sq. ft. lot	R-8,400 Single-Family Residential, 8,400 square foot minimum lots	Up to 5 units per acre	Allows for low-density, single-family dwellings.
R-7,200 Single-Family Residential, 7,200 sq. ft. lot	R-7,200 Single-Family Residential, 7,200 square foot minimum lots	Up to 6 units per acre	Allows for low-density, single-family dwellings.
R-6,000 Single-Family Residential, 6,000 sq. ft. lot	R-6,000 Single-Family Residential, 6,000 square foot minimum lots	Up to 7 units per acre	Allows for low-density, single-family dwellings.
MFR-14 Multiple-Family Residential	MFR-14 Multiple-Family Residential, 6,000 square foot minimum	Up to 14 units per acre	Comprised of medium-density, multiple-family residential units.
MFR-22 Multiple-Family Residential	MFR-22 Multiple-Family Residential, 6,000 square foot minimum lots	Up to 22 units per acre	Includes high-density, multiple-family dwellings.

Source: City of Perris General Plan Land Use Element (amended 2016), Perris Zoning Ordinance, (2014).

## 3. Zoning Ordinance

Jurisdictions are required to evaluate their land use policies, zoning provisions, and development regulations, and make proactive efforts to mitigate any constraints identified.

## **Definition of Family**

A community's Zoning Ordinance 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>6</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, etc.), 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

<sup>6</sup> City of Santa Barbara v. Adamson (1980), City of Chula Vista v. Pagard (1981), among others.



biologically related and unrelated persons. Furthermore, a zoning provision cannot regulate or enforce the number of persons constituting a family.

The Perris Zoning Ordinance defines a family as "an individual or two or more persons related by blood or marriage or a group of not more than six persons, excluding servants, who are not related by blood or marriage, living together as a single housekeeping unit in a dwelling unit." This definition may constitute a potential violation of fair housing laws.

### **Density Bonus**

California Government Code Section 65915 provides that a local government shall grant a density bonus of at least 20 percent (five percent for condominiums) and an additional incentive, or financially equivalent incentive(s), to a developer of a housing development agreeing to provide at least:

- Ten percent of the units for households with incomes up to 80 percent AMI;
- Five percent of the units for households with incomes up to 50 percent AMI;
- Ten percent of the condominium units for households with incomes up to 120 percent AMI:
- A senior citizen housing development; or
- Qualified donations of land, condominium conversions, and child care facilities.

The density bonus law also applies to senior housing projects and projects which include a child care facility. In addition to the density bonus stated above, the statute includes a sliding scale that requires:

- An additional 2.5 percent density bonus for each additional increase of one percent of units for households with incomes up to 50 percent AMI above the initial five percent threshold;
- A density increase of 1.5 percent for each additional one percent increase in units for households with incomes up to 80 percent AMI above the initial 10 percent threshold;
   and
- A one percent density increase for each one percent increase in units for households with incomes up to 120 percent AMI above the initial 10 percent threshold.

In addition to a density bonus, developers may also be eligible for one of the following concessions or incentives:

- Reductions in site development standards and modifications of zoning and architectural design requirements, including reduced setbacks and parking standards;
- Mixed used zoning that will reduce the cost of the housing, if the non-residential uses are compatible with the housing development and other development in the area; and
- Other regulatory incentives or concessions that result in "identifiable, financially sufficient, and actual cost reductions."

Perris complies with the Density Bonus provisions required by State law (Chapter 4.3, Section 65915) for residential zones. The density bonus provisions apply to all housing developments consisting of five or more dwelling units. Developers also have a density bonus option with the



Planned Development Overlay zone. This overlay zone grants a density bonus of up to 10 percent when the following criteria are met (as established by the overlay zone:

- The proposed density increase is compatible with surrounding land uses and will not adversely affect the public health, safety, welfare, comfort, or convenience.
- Suitable infrastructure either exists or will be concurrently constructed to serve the proposed project (i.e., streets, water, sanitary sewer, power, drainage facilities, etc.).
- The project is in close proximity to schools, shopping, and related residential support services.
- The project is well planned, exhibiting excellence in architectural, site and landscape design.
  - The project creates a superior residential environment as evidenced by the provision of open space that is directly accessible to dwelling units.

However, there have been additional changes to the State Density Bonus law since the Perris Zoning Code was adopted in 2010. The City needs to update its density bonus provisions to comply with State law.

### **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 restrict 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 City's parking requirements are typical for a city of its size, and do not constrain the development of housing (Table IV.2). Special parking standards have been established for the Downtown Specific Plan to accommodate mixed-use projects and foster shared parking concepts. The City will also consider establishing reduced parking standards for senior projects and projects with affordability components when located in close proximity to transportation routes and public services. The Senior Housing Overlay zone (SHO) includes additional parking requirements and references the general parking requirements. Additional parking requirements include locating parking courts within 150 feet from the dwelling unit for which the parking space is provided. It also includes provisions that result in reduced parking standards, such as allowing a minimum of 1.15 parking spaces per dwelling unit.



**Table IV.2: Parking Requirements** 

Residential Type	Required Parking Spaces	Comments
Single-Family	Rural Residential/Agricultural Zone: 2 spaces, one within a garage.  Detached Residential, R-10,000 Zone: 2 garage	Each covered parking space in a garage or carport shall have a minimum dimension not less than 10 feet in width and 20 feet in
	spaces. Detached Residential, R-6,000 Zone: 2 garage spaces.	length. Minimum size for a one-car garage shall be no less than 250 square feet.
Multiple-Family	Attached Residential, R-6,000, MFR-14, MFR-22 Zones: 2 spaces per unit, one within a garage; Apartments: One space per unit shall be within a carport or an enclosed garage.  Studio Unit: 1 space/unit.  One Bedroom Unit: 1 space/unit.  Two Bedroom Unit: 1.5 spaces/unit.  Each additional bedroom: 0.25 spaces/unit up to 10 spaces, and 0.010 spaces/unit exceeding 10 spaces.	Guest spaces shall be distributed throughout development. Each uncovered space shall have a minimum dimension of not less than 9 feet in width and 19 feet in length. No more than 15% of uncovered parking spaces for multi-family development may be compact parking stalls. Each compact parking stall shall have minimum dimension not less than 8 feet in width and 16 feet in length.

Source: City of Perris Zoning Ordinance, consulted in 2019.

### **Variety of Housing Opportunity**

To ensure fair housing choice in a community, a Zoning Ordinance should provide for a range of housing types, including single-family, multiple-family, second dwelling units, mobile and manufactured homes, licensed residential care facilities, emergency shelters, supportive housing, transitional housing, single room occupancy (SRO) units, and farm employee housing. Table IV.3 and Table IV.4 identify zones in which various residential uses are permitted and conditionally permitted in Perris.

Table IV.3: Housing Types Permitted by Zoning District

Uses	R-20,000	R-10,000	R-8,400	R-7,200	R-6,000	MFR-14	MFR-22	R4	R5
Single-family detached	Р	Р	Р	Р	Р	Р	Р		
Single-family attached					Р	Р	Р		
Multi-family (2-4 units)						Р	Р		
Multi-family (5+ units)						Р	Р		
Residential Care (≤6 persons)	Р	Р	Р	Р	Р	Р	Р		
Residential Care (>6 persons)	С	С	С	С	С	С	С		
Manufactured Homes	Р	Р	Р	Р	Р	Р	Р		
Mobile Homes	С	С	С	С	С	С	С	Р	Р
Single Room Occupancy Housing	Р	Р	Р	Р	Р	Р	Р		Р
Transitional Housing	Р	Р	Р	Р	Р	Р	Р	Р	Р
Supportive Housing	Р	Р	Р	Р	Р	Р	Р	Р	Р
Second Units	Р	Р	Р	Р	Р	Р	Р		Р

P = Permitted use; C = Conditional use. Source: Perris Zoning Code, 2019.



Table IV.4: Housing Types Permitted by Non-Residential Zone and Specific Plan Area

Uses	CN	CC	GI	Green Valley	New Perris	Park- west	River Glen	Harvest Landing	Down- town
Single-family detached				Р	Р	Р	Р	Р	Р
Single-family attached				Р	Р	Р	Р	Р	Р
Multi-family (2-4 units)				Р	Р	Р	Р	Р	Р
Multi-family (5+ units)				Р	Р	Р	Р	Р	Р
Residential Care (≤6 persons)	С	С							
Residential Care (>6 persons)	С	С							
Single Room Occupancy Housing				Р	Р	Р	Р	Р	Р
Emergency Shelter			Р						

P = Permitted use; C = Conditional use. Source: Perris Zoning Code, 2019.

### Single- and Multi-Family Uses

Single- and multiple-family housing types include detached and attached single-family homes, duplexes or half-plexes, town homes, condominiums, and rental apartments. Zoning Ordinances should specify the zones in which each of these uses would be permitted. The City of Perris accommodates single- and multiple-family housing in most of its residential zones and specific plan areas.

#### Second Units

Second dwelling units are attached or detached dwelling units that provide complete independent living facilities for one or more persons, including permanent provisions for living, sleeping, cooking and sanitation. Second units may be an alternative source of affordable housing for lower income households and seniors. These units typically rent for less than apartments of comparable size.

California law requires local jurisdictions to adopt ordinances that establish the conditions under which second units are permitted. Second units cannot be prohibited in residential zones unless a local jurisdiction establishes that such action may limit housing opportunities in the region and finds that second units would adversely affect the public health, safety, and welfare in residential zones. The State's second unit law also requires use of a ministerial, rather than discretionary, process for reviewing and approving second units. A ministerial process is intended to reduce permit processing time frames and development costs because proposed second units that are in compliance with local zoning standards can be approved without a public hearing.

The City of Perris amended its second dwelling unit ordinance in 2010 in accordance with California Government Code § 65852.2 then and continues to expedite the processing of second dwelling unit applications. Both attached and detached second dwelling units require a secondary residential unit permit prior to construction and is subject to review and approval by the Development Services Director. Both attached and detached second dwelling units must comply with all development standards for new single-family dwelling units along with the standards mentioned below. The following standards apply to attached second dwelling units:



- The total floor area shall not exceed 30 percent of the existing living area of the primary residence:
- The architecture must be consistent with the existing unit architecture and material;
- One enclosed garage, off-street parking space, with a minimum area of 250 square feet shall be provided in addition to that required for the primary unit;
- The second dwelling unit must be connected to a public sewer; and
- The character and appearance of the primary residence shall be maintained to appear as a single-family unit.

For detached second dwelling units the following standards apply:

- A detached unit may be attached to an accessory structure, such as a detached garage;
- The total floor area of the second unit shall not exceed 75 percent of the total square footage of the living area of the primary unit;
- Architecture of the new unit shall be consistent with the existing unit architecture and material:
- One enclosed garage, off street parking space, with a minimum area of 250 square feet shall be provided in addition to that required for the primary unit. The garage shall be attached to the second unit; and
- The second dwelling unit must be connected to a public sewer.

However, there have been significant changes to the State Second Units law, now renamed to Accessory Dwelling Units (ADUs). The City needs to update its ordinance to be consistent with new State law.

#### 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). A local jurisdiction's Zoning Ordinance should be compliant with this law.

Manufactured housing is permitted by right in all zones which permit single-family houses, pursuant to State law. Additionally, mobile homes are permitted in the R-4 and R-5 Districts. Mobile home parks are subject to a conditional use permit in all other residential zones.

#### Residential Care Facilities

The Lanterman Developmental Disabilities Services Act (Sections 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.

Pursuant to State law, Perris permits state-licensed residential care facilities serving six or fewer persons in all of its residential zoning districts by right. State-licensed residential care facilities providing care for 7 to 12 persons with special needs are subject to review and approval of a large residential care permit. Residential care centers providing care for 12 or more persons with special needs are subject to review and approval of a conditional use permit. The review and permitting of residential care facilities and care centers pertain to development standards such as parking, hours of operation, noise, traffic circulation, and security, which may affect the approval certainty of these care facilities and care centers. The provisions and extended review procedure associated with these projects requires a significant commitment in time and financing that may discourage the development of these residential care facilities and care centers.

#### **Emergency Shelters**

An emergency shelter provides housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay (Health and Safety Code Section 50801[e]).

State law requires jurisdictions to identify adequate sites for housing which will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all income levels, including emergency shelters and transitional housing (Government Code Section 65583[c][1]). Changes to State law in 2008 (SB 2), requires that local jurisdictions make provisions in the zoning code to permit emergency shelters by right and with a ministerial approval process in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. Local jurisdictions may, however, establish limited and objective standards to regulate the development of emergency shelters.

The City amended the Zoning Code in 2013 to allow emergency shelters as a permitted use in the General Industrial (GI) zone, particularly the GI land that is bounded by Malbert Road to the north and Mountain Avenue to the south; located at least 1,200 feet southerly of Ellis Avenue.

### Transitional and Supportive Housing

State law (SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing. Transitional housing is defined as buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months (California Health and Safety Code Section 50675.2[h]).

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 Section 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 Section 11139.3 of the Government Code.

Pursuant to SB 2, transitional and supportive housing constitutes a residential use and therefore local governments cannot treat it differently from other types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). The City amended the Zoning Code in 2013 to allow transitional and supportive housing as a permitted use by right in all residential zones, with the exception of Airport Areas I and II as mapped at www.rcaluc.org and within Compatibility Zones A, B1, B2, and C of the Airport Influence Area of Perris Valley Airport.

### 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 households. SRO units are small, one-room units intended for occupancy by a single individual and are considered a suitable housing type to meet the needs of Extremely Low income individuals. It is distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. SRO units are one of the most traditional forms of affordable private housing for lower income individuals, including seniors and persons with disabilities (protected classes under fair housing laws).

The City's Zoning Code was amended in 2013 to permit SROs in all residential zones as a permitted use by right, except within the Airport Area I as mapped at www.rcaluc.org and within Compatibility Zones A, B1, and B2 of the Airport Influence Area of Perris Valley Airport. Additionally, the ordinance revision includes a limit of 75 rooms per acre of land.

# B. Occupancy Standards

Disputes over occupancy standards are typical tenant/landlord and fair housing issues. Families with children and large households are often discriminated in the housing market, particularly in the rental housing market, because landlords are reluctant or flatly refuse to rent to such households. Establishing a strict occupancy standard either by the local jurisdictions or by landlords on the rental agreements may be a violation of fair housing practices.

In general, no State or federal regulations govern occupancy standards. The State Department of Fair Employment and Housing (DFEH) uses the "two-plus-one" rule in considering the number of persons per housing unit – two persons per bedroom plus an additional person. Using this rule, a landlord cannot restrict occupancy to fewer than three persons for a one-bedroom unit or five persons for a two-bedroom unit, etc. Other issues such as lack of parking, gender of the children occupying one bedroom, should not be factors considered by the landlord when renting to a household. While DFEH 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 2010 Fire Code allows one person per 200 square feet of building floor area.

The City of Perris has not established any occupancy standards; however, the Zoning Code's definition of family may limit the number of people who can occupy a housing unit.



# C. Affordable Housing Development

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.

As shown in Figure II.6 on page 40, the City's affordable housing developments are dispersed throughout the City.

## D. Other Land Use Policies, Programs, and Controls

Land use policies, programs, and controls can impede or facilitate housing development and can have implications for fair housing choice in a community. Inclusionary housing policies can facilitate new affordable housing projects, while growth management programs and Article 34 of the California Constitution can impede new affordable housing development.

## 1. Growth Management Programs

Growth management programs facilitate well-planned development and ensure that the necessary services and facilities for residents are provided. However, a growth management program may act as a constraint if it prevents a jurisdiction from addressing its housing needs, which could indirectly impede fair housing choice. These programs range from general policies that require the expansion of public facilities and services concurrent with new development, to policies that establish urban growth boundaries (the outermost extent of anticipated urban development), to numerical limitations on the number of dwelling units that may be permitted annually.

The City of Perris does not have a growth management ordinance or policies that restrict the number of dwelling units that may be constructed within a given period of time. State housing law mandates a jurisdiction facilitate the development of a variety of housing to meet the jurisdiction's fair share of regional housing needs. Any growth management measure that would compromise a jurisdiction's ability to meet its regional housing needs may have an exclusionary effect of limiting housing choices and opportunities of regional residents, or concentrating such opportunities in other areas of the region.

# 2. Inclusionary Housing

Inclusionary housing describes a local government requirement that a specified percentage of new housing units be reserved for, and affordable to, lower and moderate income households. The goal of inclusionary housing programs is to increase the supply of affordable housing commensurate with new market-rate development in a jurisdiction. This can result in improved regional jobs-housing balances and foster greater economic and racial integration within a



community. The policy is most effective in areas experiencing rapid growth and a strong demand for housing.

Inclusionary programs can be voluntary or mandatory. Voluntary programs typically require developers to negotiate with public officials but do not specifically mandate the provision of affordable units. Mandatory programs are usually codified in the Zoning Ordinance, and developers are required to enter into a development agreement specifying the required number of affordable housing units or payment of applicable in-lieu fees prior to obtaining a building permit.

The City of Perris does not have an inclusionary housing program in place.

### E. Reasonable Accommodation

Under State and federal law, local governments are required to "reasonably accommodate" housing for persons with disabilities when exercising planning and zoning powers. Jurisdictions must grant variances and zoning changes if necessary to make new construction or rehabilitation of housing for persons with disabilities feasible, but are not required to fundamentally alter their Zoning Ordinance.

Although most local governments are aware of State and Federal requirements to allow reasonable accommodations, if specific policies or procedures are not adopted by a jurisdiction or a jurisdiction requires a public hearing or discretionary decision, residents with disabilities residents may be unintentionally displaced or discriminated against. The City amended its Zoning Code in 2013 to formally adopt reasonable accommodation procedures.

A jurisdiction's definition of a disabled person can be considered an impediment to fair housing if it is not consistent with the definition of disability provided under the Fair Housing Act. The Act defines disabled person as "those individuals with mental or physical impairments that substantially limit one or more major life activities." The City's Reasonable Accommodation Ordinance defines disability consistent with the FHA.

# F. Local Housing Authorities

The Housing Authority of the County of Riverside (HACR) administers the Housing Choice Voucher Program for the City of Perris. HACR owns and operates public housing in the City, including the development at 124 Midway Street in the City of Perris. The availability and use of Housing Choice Vouchers and public housing units must also adhere to fair housing laws.

For Housing Choice Vouchers, the Housing Act mandates that not less than 75 percent of new admissions must have incomes at or below 30 percent of the Area Median Income (AMI). The remaining balance of 25 percent may have incomes up to 80 percent of the AMI. For public housing, the Housing Act mandates that not less than 40 percent of new admissions must have incomes at or below 30 percent of the AMI. The balance of 60 percent of new admissions may have incomes up to 80 percent of the AMI. Since HACR also operates a Housing Choice Voucher program, admissions of households at or below 30 percent AMI to the voucher program during a HACR fiscal year that exceed the 75 percent minimum target requirement for the voucher program can be credited against the HACR's basic targeting requirement in the public housing program for the same fiscal year, subject to specific certain requirements.



Section 16(a)(3)(B) of the United States Housing Act mandates that public housing authorities adopt an admissions policy that promotes the de-concentration of poverty in public housing. HUD emphasizes that the goal of de-concentration is to foster the development of mixed-income communities within public housing. In mixed-income settings, lower income residents are provided with working-family role models and greater access to employment and information networks. This goal is accomplished through income-targeting and de-concentration policies. HACR has adopted an admissions policy that promotes the de-concentration of poverty in public housing.

The following local preferences are applied to Housing Choice Voucher applicants on the waiting list:

- Riverside County Residency Preference: If you live or work in Riverside County, including homeless, you are considered to be a resident (verification must be provided)
- Rent-Burdened or Homeless: If you are paying at least 30% of your gross monthly income toward rent in a form that is verifiable (i.e. cancelled checks, money order receipts etc.)
- Working Families with Minor or Dependent Children or Elderly Families or Disabled Families: To be considered a "Working family with minor or dependent children" for the purpose of meeting the waiting list preference the head of household or spouse/co-head is employed and is working at least 32 hours per week at California minimum wage or higher for the last 60 days, or receiving Unemployment, State Disability or Workman's Compensation. To be considered an "Elderly family" for the purpose of meeting the waiting list preference the head of household or spouse/co-head must be 62 years of age or older. To be considered a "Disabled family" for the purpose of meeting the waiting list preference the head of household or spouse/co-head must meet HUD's definition of disability.

For project-based voucher (PBV) assistance (i.e. public housing), HACR has a preference for households who resided in the community prior to conversion to PBV, and continue to reside in the community, who are currently eligible for participation in the PBV program.

# G. Community Participation

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 the City are typically made by the City Council, Planning Commission, and Public Safety Commission. The role of each of these bodies is discussed below.

# 1. City Council

City residents elect the City Council to guide the policy affairs of the community. The City Council must provide an environment that stimulates participation in the governing processes and must conduct the affairs of the City openly and responsively. The Council consists of five members elected at-large from the City to serve four-year terms. The City holds municipal elections in November every two years on even-numbered years. The City Council appoints the City Manager, City Attorney, and City Commission members. The City Council meets the second and last Tuesdays of each month in the City Hall Council Chambers.



# 2. Planning Commission

The Perris Planning Commission plays important advisory, regulatory, and procedural roles in land use decisions for the City of Perris. The Commission is responsible for the review of issues related to community growth and development, and approval of land development requests such as Development Plan Reviews, Conditional Use Permits, and Major Modifications. The Commission administers land use regulations and provides the City Council with recommendations on matters relating to the implementation of the City General Plan, zoning, subdivision and municipal policies. The Commission consists of seven individuals appointed by the City Council. The Commission meets the first and third Wednesday of each month in the City Hall Council Chambers.

## 3. Public Safety Commission

The Public Safety Commission plays important advisory, regulatory, and procedural roles in matters of public safety throughout the community. The Commission is responsible for the review of issues related to public safety as it pertains to the community growth, development and existing infrastructure challenges. The Commission is responsible for hearing and investigating public safety issues related to community preservation, police, fire, roads, and infrastructure and provides the City Council with recommendations on matters relating to the implementation of suggested mitigating measures. The Commission consists of seven members appointed by the City Council. Meetings are held on the second Wednesday of each month in the City Hall Council Chambers.

# 4. Sensitivity Training and Multi-Lingual Capabilities

An important strategy for expanding housing choices for all residents is to ensure that residents' concerns are heard. 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. All of the City's public and community facilities meet ADA standards and requirements and are accessible to all persons with disabilities.

While providing fair housing education for the public and housing professionals is critical, ensuring City staff understand fair housing laws and are sensitive to discrimination issues is equally important. The City of Perris sponsors annual sensitivity training for staff members who interface with the public to fulfill the AB 1825 requirement. Sensitivity training is a form of education that attempts to make a person more aware of oneself and others. Such training often incorporates principles of non-discrimination and cultural diversity, harassment, and discrimination and retaliation prevention training. The City also has designated bi-lingual employees with capabilities to serve Spanish-speaking residents.



# V. Fair Housing Practices

This chapter provides an overview of the institutional structure of the housing industry with regard to fair housing practices. In addition, this chapter discusses the fair housing services available to residents in the City of Perris, as well as the nature and extent of fair housing complaints received by the fair housing provider. Typically, fair housing services encompass the investigation and resolution of housing discrimination complaints, discrimination auditing/testing, and education and outreach, including the dissemination of fair housing information. Tenant/landlord counseling services are usually offered by fair housing service providers but are not considered fair housing services.

# A. Homeownership Market

The following discussions describe the process of homebuying and likely situations when a person/household may encounter housing discrimination. However, much of this process occurs in the private housing market over which local jurisdictions have little control or authority to regulate. The recourse lies in the ability of the contracted fair housing service providers in monitoring these activities, identifying the perpetrators, and taking appropriate reconciliation or legal actions.

## 1. Advertising

The first thing a potential buyer is likely to do when they consider buying a home is search advertisements either in magazines, newspapers, or the Internet to get a feel for what the market offers. Advertisements cannot include discriminatory references such as the use of words describing:

- Current or potential residents;
- Neighbors or the neighborhood in racial or ethnic terms;
- Adults preferred (except for senior or active adult living);
- Perfect for empty nesters;
- Conveniently located by a Catholic Church; or
- Ideal for married couples without kids.

In a survey of online listings for homes available for purchase in Perris during January 2019, only a small percentage of advertisements included potentially discriminatory language. Of a total of 65 listings surveyed, 17 listings included references to something other than the physical description of the available home and amenities and services included. All of the questionable advertisements targeted families and specifically families with children, through the identification of school districts and nearby schools in their ads, as well as child-friendly features, such as play areas for kids and family parks.

Advertising has become a sensitive area in real estate. In some instances advertisements published in non-English languages may make those who speak English uncomfortable, yet when ads are only placed in English they place non-English speaking residents at a disadvantage. While real estate advertising can be published in other languages, by law an English version of the ad must also be published, and monitoring this requirement is difficult, if not impossible. Even if an agent does not intend to discriminate in an ad, it would still be considered a violation to suggest to a reader whether or not a particular group is preferred.



Previous litigation has also set precedence for violations in advertisements that hold publishers, newspapers, Multiple Listing Services, real estate agents, and brokers accountable for discriminatory ads.

### <u>Lending</u>

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide a lot of sensitive information including their gender, ethnicity, income level, age, and familial status. Most of this information is used for reporting purposes required of lenders by the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA). The previous section of this AI provides detailed analysis of HMDA data for Perris.

## **Appraisals**

Banks order appraisal reports to determine whether or not a property is worth the amount of the loan they will be giving. Generally speaking, appraisals are based on the comparable sales of properties within the neighborhood of the property being appraised. Other factors are taken into consideration, such as the age of the structure, any improvements made, location, general economic influences, etc.

## **Real Estate Agents**

Real estate professionals may act as agents of discrimination. Some unintentionally, or possibly intentionally, may steer a potential buyer to particular neighborhoods by encouraging the buyer to look into certain areas; others may choose not to show the buyer all choices available. Agents may also discriminate by who they agree to represent, who they turn away, and the comments they make about their clients.

The California Association of REALTORS® (CAR) has included language on many standard forms disclosing fair housing laws to those involved. Many REALTOR® Associations also host fair housing trainings/seminars to educate members on the provisions and liabilities of fair housing laws, and the Equal Opportunity Housing Symbol is also printed on all CAR forms as a reminder.

### Covenants, Conditions, and Restrictions (CC&Rs)

Covenants, Conditions, and Restrictions (CC&Rs), are restrictive promises that involve voluntary agreements, which run with the land they are associated with and are listed in a recorded Declaration of Restrictions. The Statute of Frauds (Civil Code Section 1624) requires them to be in writing, because they involve real property. They must also be recorded in the County where the property is located in order to bind future owners. Owners of parcels may agree amongst themselves as to the restrictions on use, but in order to be enforceable they must be reasonable.

The California Department of Real Estate reviews CC&Rs for all subdivisions of five or more lots, or condominiums of five or more units. This review is authorized by the Subdivided Lands Act and mandated by the Business Professions Code, Section 11000. The review includes a wide range of issues, including compliance with fair housing law. The review must be



completed and approved before the Department of Real Estate will issue a final subdivision public report. This report is required before a real estate broker or anyone can sell the units, and each prospective buyer must be issued a copy of the report. If the CC&Rs are not approved, the Department of Real Estate will issue a "deficiency notice", requiring the CC&Rs be revised. CC&Rs are void if they are unlawful, impossible to perform or are in restraint on alienation (a clause that prohibits someone from selling or transferring his/her property). However, older subdivisions and condominium/townhome developments may contain illegal clauses which are enforced by the homeowners associations.

### **Homeowners Insurance Industry**

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.<sup>7</sup>

## 2. 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.

#### 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, or national origin."

Additionally, Standard of Practice Article 10-1 states that "REALTORS® shall not volunteer information regarding the racial, religious or ethnic composition of any neighborhood and shall not engage in any activity which may result in panic selling. REALTORS® shall not print, display or circulate any statement or advertisement with respect to the selling or renting of a property that indicates any preference, limitations or discrimination based on race, color, religion, sex, handicap, familial status, or national origin."

## **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

<sup>&</sup>quot;Borrower and Neighborhood Racial Characteristics and Financial Institution Financial Application Screening"; Mester, Loretta J; Journal of Real Estate Finance and Economics; 9 241-243; 1994



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.

## 3. 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.

# 4. 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 recently created the position of Equal Opportunity/Cultural Diversity Coordinator. CAR holds three meetings per year for its general membership, and the meetings typically include sessions on fair housing issues. Current outreach efforts in the Southern California area are directed to underserved communities and state-licensed brokers and sales persons who are not members of the CAR.

# 5. REALTOR® Associations Serving the City of Perris

REALTOR® Associations are generally the first line of contact for real estate agents who need continuing education courses, legal forms, career development, and other daily work necessities. The frequency and availability of courses varies amongst these associations, and local association membership is generally determined by the location of the broker for which an agent works. Complaints involving agents or brokers may be filed with these associations.

Monitoring of services by these associations is difficult as detailed statistics of the education/services the agencies provide or statistical information pertaining to the members is rarely available. The Inland Valleys Association of REALTORS® (IVAR) serves the City of Perris. Currently, IVAR uses California Regional Multiple Listing Service, Inc.

Complaints against members are handled by the associations as follows. First, all complaints must be in writing. Once a complaint is received, a grievance committee reviews the complaint to decide if it warrants further investigation. If further investigation is necessary, a professional



standards hearing with all parties involved takes place. If the member is found guilty of a violation, the member may be expelled from the association, and the California Department of Real Estate is notified.

# B. Rental Housing Market

### 1. Rental Process

### **Advertising**

Rental advertisements cannot include discriminatory references. Of a total of 60 rental listings on Craigslist.com surveyed in January 2019, 23 advertisements were found to contain potentially discriminatory language. Two advertisements reference location to schools, which may be interpreted as a preference for families.

Nine advertisements indicated proof of income is required. Legally, applicants only need to demonstrate their ability to pay rent. Whether the applicants intend to pay with wages/salaries, savings, inheritance, or insurance should not matter to the landlord. Requiring proof of income may be misleading as requiring proof of employment.

Another two advertisements explicitly states that Section 8 is not allowed. Under California's fair housing law, source of income is a protected class. It is, therefore, considered unlawful to prefer, limit, or discriminate against a specific income source for a potential applicant. However, in California Section 8 is not included as a part of this protected class, and rental advertisements that specifically state Section 8 vouchers are not accepted are considered legal. Nevertheless, nationwide, many states and communities have adopted local ordinances to include Section 8 as a protected class, such as the cities of San Francisco, Berkeley, East Palo Alto, and Los Angeles.

As with real estate advertising, advertisements for rental units can be published in other languages. However, by law an English version of the ad must also be published. The survey of rental listings found a total of two ads that were made available only in Spanish, without a corresponding ad or any text in English.

## Responding to Ads

Differential treatment of those responding to advertisements is a growing fair housing concern. In a 2011 study conducted nationally, comprehensive audit-style experiments via email correspondence were used to test for racial discrimination in the rental housing market. This study was particularly unique because it tested for two variables—discrimination based on race and social class. By responding to online rental listings using names associated with a particular racial/ethnic group and varying message content grammatically to indicate differing levels of education and/or income (i.e. social class), researchers found that, overall, Blacks continued to experience statistically significant levels of discrimination in the rental housing market. This discrimination was even more pronounced when the housing inquiry was made to look like it originated from a Black individual of a lower social class.<sup>8</sup>

<sup>&</sup>lt;sup>8</sup> Do Landlords Discriminate in the Rental Housing Market? Evidence from an Internet Field Experiment in U.S. cities. Andrew Hanson and Zackary Hawley. May 2011.



### Viewing the Unit

Viewing the unit is the most obvious place where the potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, or judge on appearance whether a potential renter is reliable or may violate any of the rules.

In a follow up to the study discussed above, researchers developed an experiment to test for subtle discrimination. Subtle discrimination is defined as unequal treatment between groups that occurs but is difficult to quantify, and may not always be identifiable through common measures such as price differences. Researchers found that, in general, landlords replied faster and with longer messages to inquiries made from white names. The study also found that landlords were more likely to use descriptive language, extend invitations to view a unit, invite further correspondence, use polite language, and make a formal greeting when replying to e-mail inquiries from a white home seeker.<sup>9</sup>

### **Credit/Income Check**

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history/salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent. Many landlords often use credit history as an excuse when trying to exclude certain groups. Legislation provides for applicants to receive a copy of the report used to evaluate applications.

The study on subtle discrimination mentioned earlier found no statistically significant evidence of discrimination in using language related to fees, asking for employment or rental history, or requesting background information.

#### The Lease

Typically, the lease or rental agreement is a standard form completed for all units within the same building. However, the enforcement of the rules contained in the lease or agreement may not be standard for all tenants. A landlord may choose to strictly enforce the rules for certain tenants based on arbitrary factors, such as race, presence of children, or disability.

Lease-related language barriers can impede fair housing choice if landlords and tenants do not speak the same language. In California, applicants <u>and</u> tenants have the right to negotiate lease terms primarily in Spanish, Chinese, Tagalog, Vietnamese or Korean. If a language barrier exists, the landlord must give the tenant a written translation of the proposed lease or rental agreement in the language used in the negotiation before the tenant signs it.<sup>10</sup> This rule applies to lease terms of one month or longer and whether the negotiations are oral or in writing.

### **Security Deposit**

A security deposit is typically required. To deter "less-than-desirable" tenants, a landlord may ask for a security deposit higher than for others. Tenants may also face discriminatory treatment when vacating the units. The landlord may choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear. A landlord may also

Subtle Discrimination in the Rental Housing Market: Evidence from E-mail Correspondence with Landlords. Andrew Hanson, Zackary Hawley, and Aryn Taylor. September 2011.

California Civil Code Section 1632(b)



require that persons with disabilities pay an additional pet rent for their service animals, a monthly surcharge for pets, or a deposit, which is also a discriminatory act.

### **During the Tenancy**

During tenancy, the most common forms of discrimination a tenant may face are based on familial status, race, national origin, sex, or disability. Usually this type of discrimination appears in the form of varying enforcement of rules, overly strict rules for children, excessive occupancy standards, refusal to make a reasonable accommodation for handicapped access, refusal to make necessary repairs, eviction notices, illegal entry, rent increases, or harassment. These actions may be used as a way to force undesirable tenants to move on their own without the landlord having to make an eviction.

## 2. California Apartment Association

The California Apartment Association has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared towards improving the approach, attitude and professional skills of on-site property managers and other interested individuals. The CCRM program consists of 31.5 hours of training that includes fair housing and ethics along with the following nine course topics:

- Preparing the Property for Market
- Professional Leasing Skills and the Application Process
- The Move-in Process, Rent Collection and Notices
- Resident Issues and Ending the Tenancy
- Professional Skills for Supervisors
- Maintenance Management: Maintaining a Property
- Liability and Risk Management: Protecting the Investment
- Fair Housing: It's the Law
- Ethics in Property Management

The CAA supports the intent of all local, State, and federal fair housing laws for all residents without regard to color, race, religion, sex, marital status, mental or physical disability, age, familial status, sexual orientation, or national origin. Members of the CAA agree to abide by the provisions of their Code for Equal Housing Opportunity.

# 3. National Association of Residential Property Managers (NARPM)

The National Association of Residential Property Managers promotes a high standard of property management business ethics, professionalism and fair housing practices within the residential property management field. NARPM is an association of real estate professionals who are experienced in managing single-family and small residential properties. Members of the association adhere to a strict Code of Ethics to meet the needs of the community, which include the following duties:

 Protect the public from fraud, misrepresentation, and unethical practices of property managers.

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- Adhere to the Federal Fair Housing statutes.
- Protect the fiduciary relationship of the client.
- Treat all tenants professionally and ethically.



- Manage the property in accordance with the safety and habitability standards of the community.
- Hold all funds received in compliance with state law with full disclosure to the client.

NARPM offers three designations to qualified property managers and property management firms:

- Residential Management Professional, RMP ®
- Master Property Manager, MPM ®
- Certified Residential Management Company, CRMC ®

Various educational courses are offered as part of attaining these designations including the following fair housing and landlord/tenant law courses:

- Ethnics (required for all members every four years)
- Habitability Standards and Maintenance
- Marketing
- Tenancy
- ADA Fair Housing
- Lead-Based Paint Law

## 4. Western Manufactured Housing Communities Association (WMA)

Western Manufactured Housing Communities Association (WMA) is a nonprofit organization created in 1945 for the exclusive purpose of promoting and protecting the interests of owners, operators and developers of manufactured home communities in California. WMA assists its members in the operations of successful manufactured home communities in today's complex business and regulatory environment. WMA has over 1,700 member parks located in all 58 counties of California.

WMA offers an award winning manager accreditation program as well as numerous continuing education opportunities. The Manufactured Home Community Manager (MCM) program is a manager accreditation program that provides information on effective community operations. WMA's industry experts give managers intensive training on law affecting the industry, maintenance standards, HCD inspections, discrimination, mediation, disaster planning, and a full range of other vital subjects.

# C. Fair Housing Services

In general, fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations as well as mediating disputes between tenants and landlords. This section reviews the fair housing services available in the City of Perris, the nature and extent of fair housing complaints, and results of fair housing testing/audits.



## 1. Fair Housing Council of Riverside County

Perris contracts the Fair Housing Council of Riverside County (FHCRC) to provide fair housing services in the City. FHCRC is a nonprofit agency whose mission is to actively support and promote fair housing through education and advocacy. FHCRC provides the following fair housing related services to Riverside County residents:

- Anti-Discrimination
- Landlord-Tenant
- Training and Technical Assistance
- Enforcement of Housing Rights
- Administrative Hearings for the Riverside County Housing Authority
- Special Projects

The following client data provided by the FHCRC details activities from FY 2013 to FY 2017 (July 1, 2013 through June 30, 2018).

### **Overall Clients Served**

Between FY 2013 and FY 2017, FHCRC provided fair housing services to a total of 7,915 clients from Perris. The number of Perris residents served has generally remained constant over time.

Table V.1: Clients Served (FY 2013 - FY 2017)

	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	Total
Perris	1,542	1,563	1,605	1,562	1,630	7,915

Source: Fair Housing Council of Riverside County (FHCRC) Annual Reports, 2013-2018.

## **Clients Served by Race and Ethnicity**

Between July 2013 and June 2018, Blacks represented 33 percent of FHCRC's clients while Whites comprised 23 percent of total clients. Approximately 40 percent of FHCRC's clients identified themselves as ethnically Hispanic. Often Hispanic persons identify with their ethnicity (e.g., Mexican, Puerto Rican) but generally do not identify with their race.

The racial/ethnic distribution of FHCRC's clients is not consistent with the City's overall demographics. According to the 2013-2017 ACS, Hispanics made up about 75 percent of the population, whereas Blacks and Whites each represented approximately ten percent of the City's residents. FHCRC client data indicates that Blacks may be disproportionately impacted by housing discrimination.

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Table V.2: Clients Served by Race/Ethnicity (FY 2013 – FY 2017)

	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	Total	Percent
Asian	13	22	25	3	5	68	0.9%
Asian & White	4	3	0	0	0	7	0.1%
Black	549	467	478	522	605	2,621	33.1%
Black and Hispanic	10	0	0	1	6	17	0.2%
Black and White	13	5	0	0	0	18	0.2%
Hispanic	659	712	648	572	545	3,136	39.6%
Hispanic Black & White	4	0	0	0	0	4	0.1%
Native American/Alaskan Native	0	5	4	10	0	19	0.2%
Native Hawaiian/Pacific Islander	2	0	2	0	0	4	0.1%
Other	6	5	8	0	0	19	0.2%
Other Multi Race Hispanic	4	0	3	43	43	93	1.2%
Other Multi Race Non-Hispanic	8	5	0	0	0	13	0.2%
Unknown (Other Multi Race/Non-Hispanic)	3	0	4	13	45	65	0.8%
White Non-Hispanic	267	344	441	399	381	1,832	23.1%
Total	1,542	1,568	1,613	1,562	1,630	7,915	100.0%

Source: Fair Housing Council of Riverside County (FHCRC) Annual Reports, 2013-2018.

## **Clients Served by Income**

As with most jurisdictions, statistics reported for the City of Perris indicate that lower income persons, regardless of race, are the most heavily impacted by fair housing issues. Between FY 2013 and FY 2017, 84 percent of those served by the FHCRC were lower income, with most clients falling in the very low income category (34 percent).

Table V.3: Clients Served by Income Level (FY 2013 - FY 2017)

	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	Total	Percent
Very Low	786	605	429	409	466	2,695	34.1%
Low	594	589	944	934	865	3,926	49.6%
Moderate	116	277	195	167	171	926	11.7%
Above Moderate	46	97	45	52	128	368	4.6%
Total	1,542	1,568	1,613	1,562	1,630	7,915	100.0%

Source: Fair Housing Council of Riverside County (FHCRC) Annual Reports, 2013-2018.



### **Clients Served by Other Characteristics**

Between FY 2013 and FY 2017, the special characteristics of the fair housing clients were four percent female-headed households, three percent persons with disabilities, and less than one percent seniors. However, there may be overlaps among these characteristics. Furthermore, input from the FHCRC at the Stakeholder Meeting and Community Workshop indicates that housing discrimination against the seniors has been increasing in the community.

Table V.4: Clients Served by Household Characteristics (FY 2013 – FY 2017)

	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	Total	Percent
Seniors	14	14	5	1	4	38	0.5%
Female Headed Households	55	82	34	57	58	286	3.9%
Persons with Disabilities	67	50	24	47	32	220	3.0%
Total Clients	136	146	63	105	94	544	7.3%

Source: Fair Housing Council of Riverside County (FHCRC) Annual Reports, 2013-2017.

Note: Each client can represent several household characteristics. For example, a senior may also be a female-headed household and a person with disabilities.

### **Housing Discrimination Complaints**

Between FY 2013 and FY 2017, the FHCRC handled 111 cases of housing discrimination. Most cases were related to physical disability (49 percent), but a significant number also involved race (15 percent), familial status (14 percent), and mental disability (seven percent).

Table V.5: Discrimination Cases by Protected Classification (FY 2013 – FY 2017)

	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	Total	Percent
Age	0	0	0	0	0	0	0.0%
Ancestry	0	0	0	0	0	0	0.0%
Arbitrary	1	1	2	0	0	4	3.6%
Color	0	0	0	0	0	0	0.0%
Familial Status	7	0	2	2	5	16	14.4%
Gender	0	0	0	0	0	0	0.0%
Marital Status	0	0	0	0	0	0	0.0%
Mental Disability	0	4	0	1	3	8	7.2%
National Origin	0	1	5	0	1	7	6.3%
Physical Disability	16	14	7	7	10	54	48.6%
Race	7	4	1	1	4	17	15.3%
Religion	0	0	0	0	0	0	0.0%
Sex	0	0	0	1	0	1	0.9%
Sexual Orientation	0	0	0	0	1	1	0.9%
Source of Income	1	1	0	1	0	3	2.7%
Total Complaints	32	25	17	13	24	111	100.0%

Source: Fair Housing Council of Riverside County (FHCRC) Annual Reports, 2013-2017.



### **Tenant Landlord Counseling**

A number of Perris residents contacted the FHCRC for assistance with landlord/tenant issues and complaints. Concerns regarding tenant/landlord issues ranged from eviction to substandard conditions and questions on how to get repairs made. From FY 2013 to FY 2017, the most common issue the FHCRC encountered was clients seeking assistance with when receiving notices of eviction (21 percent) and repairs (19 percent) (Table V.6).

Table V.6: Summary of Housing Issues (FY 2013 – FY 2017)

	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	Total	Percent
Eviction	138	137	86	133	121	615	8.3%
Occupancy Standards	18	1	4	11	0	34	0.5%
Repairs	252	262	354	310	218	1,396	18.8%
Deposits	111	149	96	39	48	443	6.0%
Entering/Harassment	12	28	29	35	34	138	1.9%
Late Fees	5	5	2	3	12	27	0.4%
Lead	3	0	0	0	0	3	0.0%
Lease/Rental Terms	188	230	188	133	207	946	12.8%
Mobile Homes	13	14	20	7	12	66	0.9%
Mold	22	17	46	79	35	199	2.7%
Rental Assistance	29	12	18	27	2	88	1.2%
Rent Increase	13	12	35	92	76	228	3.1%
Homeless Assistance Referrals	14	15	14	5	9	57	0.8%
Habitability	30	97	82	57	42	308	4.2%
Notices	300	276	327	315	306	1,524	20.6%
Section 8 Issues	3	34	34	16	16	103	1.4%
Other	100	152	197	229	157	835	11.3%
Affordable Housing	106	99	61	58	28	352	4.8%
Foreclosure	39	2	5	0	0	46	0.6%
Total	1,396	1,542	1,598	1,549	1,323	7,408	100.0%

Source: Fair Housing Council of Riverside County (FHCRC) Annual Reports, 2013-2017.

### **Education and Outreach Efforts**

Education is one of the most important components of providing fair housing services. It is also believed to be one of the most important tools in ensuring that fair housing opportunities are provided, by giving citizens the knowledge to understand their rights and responsibilities, to recognize discrimination, locate resources if they need to file a complaint or need general assistance, and much more. The following briefly looks at some of the educational outreach efforts provided by the FHCRC.

Outreach efforts provided by the FHCRC in Perris include:

 Conducted Fair Housing and Landlord Tenant outreach, distributed literature, and gave presentations at various locations in the City, including: the Perris Family Resource Center, Public Share-a-thon Resource Fair, Perris Harvest Festival/Safe & Healthy Life



Styles Event, Mead Valley Health and Safety Fair, Day of the Child, WIC Event held by Riverside County DPSS, Training Occupational Development Education Community Center (TODECC), and City Council meetings.

- First-Time Homebuyer workshops were held in both English and Spanish held up to two times a month at various locations, including the City's library.
- Hosted and participated in a free Foreclosure Prevention Counseling workshop held in collaboration with the Riverside County Library Systems in the City of Perris.
- Operated a booth monthly at the Perris Farmer's Market in downtown Perris to distribute information about the Lead Hazard Control Program and also conducted inspections.
- Attended training held by Community Action Partnership in City of Perris.

## 2. California Department of Fair Employment and Housing (DFEH)

The mission of the Department of Fair Employment and Housing (DFEH) is to protect Californians from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, DFEH keeps track of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence.

Since 2013, a total of four fair housing complaints in Perris have been filed with DFEH. Each case can involve multiple complaints and acts of discrimination. One of these complaints involved race/color, one concerned familial status, one case concerned physical disabilities and religion, and one involved gender.. Of the four complaints, the majority of the alleged acts of discrimination were for denial of equal terms and conditions, and the denial of rental/sale/lease. Three of the cases were investigated and dismissed for insufficient evidence, and another a no cause determination.

Investigations 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 DFEH 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, DFEH'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 DFEH conducts a formal investigation.

If the investigative findings do not show a violation of the law, DFEH will close the case. If investigative findings show a violation of law, the DFEH schedules a formal conciliation conference. During the conciliation conference, the DFEH presents information supporting its belief that there has been a violation and explores options to resolve the complaint. If formal conciliation fails, the DFEH 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.



Table V.7: Cases Filed With DFEH (2013-2018)

	2013	2014	2015	2016	2017	2018	Total
Bases							
Sex-Gender	1	0	0	0	0	0	1
Race/Color	0	1	0	0	0	0	1
Familial Status	0	0	1	0	0	0	1
Religion	0	0	0	0	0	1	1
Physical Disability - Other	0	0	0	0	0	1	1
Total	1	1	1	0	0	2	5
Acts <sup>1</sup>							
Subjected to restrictive/covenant	0	1	0	0	0	0	1
Denied equal terms and conditions	0	0	0	0	0	1	1
Subjected to discriminatory statements/advertisement	0	1	0	0	0	1	2
Denied rental/sale/lease	0	0	0	0	0	1	1
Eviction	0	0	1	0	0	1	2
Harassment	1	0	0	0	0	0	1
Denied Reasonable Modification/Accommodation	0	0	0	0	0	1	1
Total	1	2	1	0	0	5	9
Closing Category							
Investigated and Dismissed – Insufficient Evidence	1	1	1	0	0	0	3
No Cause determination	0	0	0	0	0	1	1
Total	1	1	1	0	0	1	4

Source: California Department of Fair Employment and Housing, 2019. Note:

# 3. U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) maintains a record of all housing discrimination complaints for jurisdictions, including the City of Perris. According to the HUD website, any person who feels 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 DEFH, which has 30 days to address the complaint. As a substantially equivalent agency, DFEH's findings are usually accepted by HUD. Thereafter, HUD tracks the complaint and its issues and outcomes as a "dually filed" complaint.

From 2013 to 2018, six fair housing cases in Perris were recorded by HUD. Cases involving discrimination based on race (3 cases), disability (3 cases), and retaliation (3 cases) were the most common (Table V.8). The number of discrimination cases recorded annually has fluctuated between 2013 and 2018, with no reported cases in 2013, 2017, and 2018.

Each case can involve multiple acts of discrimination. Therefore the number of acts often exceeds the number of cases.



All of the six fair housing cases filed between 2013 and 2018 were closed, according to HUD. Most of these cases (three cases) were found to have no cause determination and subsequently closed. An additional three cases were closed after successful conciliation or resolution.

Table V.8: Basis for Discrimination of Cases filed with HUD (2013-2018)

Year	Race	Disability	Familial Status	Retaliation	National Origin	Total
2013	0	0	0	0	0	0
2014	0	1	0	1	0	2
2015	1	1	1	1	0	4
2016	2	1	0	1	1	5
2017	0	0	0	0	0	0
2018	0	0	0	0	0	0
Total	3	3	1	3	1	11

Source: Department of Housing and Urban Development (HUD), 2019. Note:

### D. 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 hatemotivated 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 statistics compiled by the Federal Bureau of Investigation (FBI) show that only one hate crime was committed in Perris over a five-year period (2013-2017). Specifically this hate crime was based on religion. (Table V.9). In Riverside County as a whole, race based hate crimes were also the most prevalent.

<sup>1.</sup> Each case can involve multiple acts of discrimination. Therefore the number of acts often exceeds the number of cases.



**Table V.9: Hate Crimes (2013-2017)** 

Basis of Complaints	Race/ Ethnicity/A ncestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
Perris							
2013	0	0	0	0	0	0	0
2014	0	0	0	0	0	0	0
2015	0	0	0	0	0	0	0
2016	0	1	0	0	0	0	1
2017	0	0	0	0	0	0	0
Total	0	1	0	0	0	0	1
Riverside Coun	ty						
2013	29	5	6	0	0	1	41
2014	30	2	5	0	0	0	37
2015	14	8	3	0	0	0	25
2016	13	4	5	0	0	1	23
2017	15	6	6	0	0	0	27
Total	101	25	25	0	0	2	153

Source: U.S. Department of Justice Federal Bureau of Investigation, 2013-2017.



# VI. Progress Since Last Al

The 2014 AI identified a number of fair housing issues in Perris and outlined actions the City would take to mitigate or eliminate these barriers. This chapter reviews the accomplishments the City has made in carrying out these actions.

# A. Major Issues and Recommendations

## 1. Lending Patterns

With regard to lending patterns in Perris, the following irregularities were identified:

- Two institutions had significantly higher than average rates of withdrawn and incomplete applications—Citibank NA, and First Mortgage Corporation (61 percent and 27 percent, respectively, versus 17 percent overall).
- Some financial institutions also appeared to be more popular among certain racial/ethnic groups, Hispanic applicants were much more likely to favor smaller, less established financial institutions.
- While the incidence of subprime loans has decreased overall, Blacks and Hispanics continue to be most likely to receive subprime loans than other race/ethnic groups.
- Of the top lenders, Quicken Loans, Inc. had a significantly higher approval rate (over 94 percent) in comparison to the overall average rate for all lenders (63 percent).

#### **Recommended Actions:**

**Action 1:** In conjunction with the Fair Housing Council of Riverside County (FHCRC), provide workshops for on financial literacy. (Annually)

**Action 2:** In conjunction with the Fair Housing Council of Riverside County (FHCRC), provide homebuyer workshops that target minority or lower income households. (Annually)

**Action 3:** Partner with lenders to provide outreach and education on financial literacy. (Ongoing)

**Accomplishments:** The City continued to contract with the Fair Housing Council of Riverside County (FHCRC) to provide fair housing and tenant/landlord services. Specifically, FHCRC services include the following that would benefit homeowners and potential homebuyers:

- Free first-time homebuyer workshops to individuals regarding the process of buying a home.
- Foreclosure prevention counselors to provide with loan modification services.
- Pre-purchase consulting to help potential buyers qualify for a FHA-insured mortgage.
- Credit counseling



# 2. Housing Discrimination and Hate Crimes

FHCRC client data indicates that Blacks may be disproportionately impacted by housing discrimination. Majority of the housing discrimination cases and hate crimes were race-based.

#### **Recommended Actions:**

**Action 4:** Continue to endorse the efforts of the Fair Housing Council of Riverside County (FHCRC) by supporting their goals and objectives for term of the 2009-2014 Consolidated Plan:

- Maintain a discrimination hotline;
- Provide training for City staff including Police and Code Enforcement on crime free housing, landlord tenant law, and fair housing regulations;
- Provide counseling and education services directly to landlords and tenants;
- Document the type, source, and resolution of discrimination complaints and the demographics of the complainant;
- Distribute literature; and
- Represent the City at salient program outreach meetings.

**Action 5:** Support the efforts of the Housing Authority of the County of Riverside to provide information and counseling to new recipients of government rental subsidies, which will assist renters in dealing with reluctant landlords and finding suitable housing and to rental property owners, apartment managers and apartment owners associations, (Ongoing)

**Accomplishments:** The City continues to contract with the FHCRC to provide fair housing services for residents. Since 2015, the FHCRC has responded to a total of 4,470 calls for assistance with a landlord and tenant dispute. The FHCRC has also responded to a total of 54 calls for assistance with housing discrimination issues. Other outreach activities conducted in Perris by the FHCRC include:

- First-Time Homebuyer workshops conducted in both English and Spanish
- Foreclosure Prevention Counseling workshops
- Fair Housing and Fair Lending workshops
- Literature distribution at all workshops and other events including the Perris Farmer's Market and Council Meetings.

Part of the Housing Authority of the County of Riverside's (HARVICO) objectives in issuing new vouchers is to provide families selected to participate with the tools to help them be successful in obtaining an acceptable unit, and to give them sufficient knowledge to derive maximum benefit from the program and to comply with program requirements. In order to assist families who claim discrimination, HACR provides participant families with the HUD Discrimination Complaint form and offers to assist in the completion of the form as well as directing the family to report suspected discrimination to the FHCRC.

# 3. Furthering Access to Housing and Services

Fair housing opportunity includes the provision of a range of types and prices of housing as well as the fair treatment of people in the sale, rental, and occupancy of housing and receipt of community services. Recognizing these objectives, the City's Housing Element is designed to ensure a mix and balance of housing types and costs to meet the needs of all segments of the



Perris community. The City's Consolidated Plan provides further guidance on the provision of needed services to extremely low, low and moderate income families.

#### **Recommended Actions:**

**Action 6:** Continue to implement the housing and economic development policies established in the City's General Plan, Housing Element, and Consolidated Plan.

**Accomplishments:** Outreach efforts provided by the FHCRC in Perris include First-Time Homebuyer Workshops held at various locations in the City, including the Perris Library. The City of Perris has provided locations for the workshops on a monthly basis, which has allowed the FHCRC to provide quality education at no charge to participants. During these sessions, residents are provided counseling, literature is distributed, and other general information and services are provided.

The City's reasonable accommodation procedures provides a basis for residents with disabilities to request flexibility in the application of land use and zoning regulations or, in some instances, even a waiver of certain restrictions or requirements from the local government to ensure equal access to housing opportunities. The City will continue to provide information regarding the City's reasonable accommodation ordinance and make information on the program widely available to residents.

## 4. Limited English Proficiency

Approximately 43 percent of Perris residents speaking Spanish at home speak English "less than very well," and 53 percent of City residents speaking Asian languages at home speak English "less than very well." Limited English proficiency may limit a person's participation in the local government's decision-making process relating to housing matters.

### **Recommended Actions:**

**Action 7:** Conduct an assessment of Limited English Proficiency to determine the extent of need for translation services at civic activities. (By the end of 2015)

**Accomplishments:** The City publishes all public notices regarding the CDBG program in English and Spanish. Bi-lingual City staff is also available to assist residents in need.

# 5. Zoning Ordinance

The Perris Zoning Ordinance defines a family as "an individual or two or more persons related by blood or marriage or a group of not more than six persons, excluding servants, who are not related by blood or marriage, living together as a single housekeeping unit in a dwelling unit." This definition may constitute a potential violation of fair housing laws.

#### **Recommended Actions:**

**Action 8:** Amend the Zoning Ordinance to either remove or provide an inclusive definition of family. (By the end of 2015)



**Accomplishments:** The City has not yet amended the Zoning Ordinance to provide an inclusive definition of family. However, the City does not enforce the Zoning Ordinance based on this definition. This action will be carried forward in the 2019 AI.

## 6. Discriminatory Language in Real Estate Advertising

A large number of listings for rental units and for-sale homes include potentially discriminatory language, such as encouraging or discouraging family living, or potentially discouraging persons with disabilities by emphasizing a no-pet policy without clarifications that service/companion animals are allowed. Several ads also were in Spanish only, violating the requirement to provide the same ad in English.

### **Recommended Actions:**

**Action 9:** Contract with the Fair Housing Council of Riverside County to monitor the advertising of for-sale and for-rent units. (Ongoing)

**Action 10:** Publicize fair housing rights and responsibilities on City website, newsletter, or other publications as a way of outreaching to landlords new to the rental business. (Ongoing)

**Action 11:** Outreach to the advertising departments of newspapers to encourage participation in fair housing workshops. (Ongoing)

**Accomplishments:** The City continues to contract with the FHCRC to provide a range of outreach and education activities. As part of this Al update, for-sale and for-rent ads were reviewed for potentially discriminatory language.



# VII. Fair Housing Action Plan

This chapter builds upon the analysis in the previous chapters, summarizes conclusions, and outlines the City's commitment to actions for addressing impediments to fair housing for the upcoming 2019-2024 planning period.

# A. Ongoing Impediments

## 1. Lending Patterns

While HMDA data cannot be used to prove discrimination in motive or outcome, it highlights irregularities that may warrant close monitoring. With regard to lending patterns in Perris, the following irregularities were identified:

- There is a need for home improvement financing. Applications for home improvement loans almost tripled between 2012 and 2017. However, approval rate for this type of financing remained relatively low at 43 percent.
- Comparatively, Hispanic households have limited access to homeownership opportunities due to their generally lower incomes. However, for households in the same income level, Black applicants consistently had the lowest approval rates.
- The frequency of loans with reported spread increased significantly between 2012 and 2017, more than doubling for all race groups. However, the magnitude of spread narrawed, meaning that while applicants were far more likely to utilize subprime loans in 2017, the interest rates were not significantly higher than prime loans.

#### Recommendation:

**Action 1:** As funding permits, pursue reinstatement of the City's Residential Rehabilitation and Senior Repair programs. Annually evaluate the City's financial capacity to determine the feasibility of funding housing rehabilitation assistance. (Annually)

**Action 2:** In conjunction with the Fair Housing Council of Riverside County (FHCRC), provide workshops for on financial literacy. (Annually)

**Action 3:** In conjunction with the Fair Housing Council of Riverside County (FHCRC), provide homebuyer workshops that target minority or lower income households. (Annually)

**Action 4:** Partner with lenders to provide outreach and education on financial literacy. (Ongoing)

# 2. Housing Discrimination

Based on fair housing records and input, housing discrimination persists in the community, especially relating to racial discrimination. Specifically:

 According to the 2013-2017 ACS, Hispanics made up about 75 percent of the population, whereas Blacks and Whites each represented approximately ten percent of



the City's residents. FHCRC client data indicates that Blacks, comprising 33 percent of the clients served between FY 2013 and FY 2017, may be disproportionately impacted by housing discrimination

- Between FY 2013 and FY 2017, the FHCRC handled 111 cases of housing discrimination. Most cases were related to physical disabilities (49 percent), but a significant number also involved race (14 percent), familial status (14 percent), and mental disabilities (seven percent).
- Input from fair housing service providers and participants at the Stakeholder Meeting, housing discrimination/harassment against seniors has increased. However, many seniors may not know their rights and resources available.

#### Recommendation:

**Action 5:** Continue to endorse the efforts of the Fair Housing Council of Riverside County (FHCRC) by supporting their goals and objectives for term of the FY 2019 – FY 2023 Consolidated Plan:

- Maintain a discrimination hotline;
- Provide training for City staff including Police and Code Enforcement on crime free housing, landlord tenant law, and fair housing regulations;
- Provide counseling and education services directly to landlords and tenants;
- Document the type, source, and resolution of discrimination complaints and the demographics of the complainant;
- Distribute literature; and
- Represent the City at salient program outreach meetings.

**Action 6:** Support the efforts of the Housing Authority of the County of Riverside to provide information and counseling to new recipients of government rental subsidies, which will assist renters in dealing with reluctant landlords and finding suitable housing and to rental property owners, apartment managers and apartment owners associations, with an emphasis on the potential benefits afforded under the Housing Choice Voucher Program. (Ongoing)

# 3. Furthering Access to Housing and Services

Fair housing opportunity includes the provision of a range of types and prices of housing as well as the fair treatment of people in the sale, rental, and occupancy of housing and receipt of community services. Recognizing these objectives, the City's Housing Element is designed to ensure a mix and balance of housing types and costs to meet the needs of all segments of the Perris community. The City's Consolidated Plan provides further guidance on the provision of needed services to extremely-low, low- and moderate-income families.

#### Recommendation:

**Action 7:** Continue to implement the housing and economic development policies established in the City's General Plan, Housing Element and Consolidated Plan. (Ongoing)



## 4. Limited English Proficiency

Approximately 37 percent of Perris residents speaking Spanish at home speak English "less than very well," and 29 percent of City residents speaking Asian languages at home speak English "less than very well." Limited English proficiency may limit a person's participation in the local government's decision-making process relating to housing matters.

**Action 8:** Continue to publish public notices of housing and community events in English and Spanish, and make bilingual staff available to provide translation upon request. (Ongoing)

## 5. Zoning Code

The Zoning Code regulates housing development. The City must ensure that its zoning provisions facilitate and encourage a variety of housing options in the community. The following are areas where revisions to the Zoning Code may be warranted:

- Definition of Family: 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. The Perris Zoning Ordinance defines a family as "an individual or two or
  more persons related by blood or marriage or a group of not more than six persons,
  excluding servants, who are not related by blood or marriage, living together as a single
  housekeeping unit in a dwelling unit." This definition may constitute a potential violation
  of fair housing laws.
- **Density Bonus:** The Perris Zoning Code was adopted in 2010. There have been major changes to the State Density Bonus law.
- **Second Unit:** There have been significant changes to the State Second Units law, now renamed to Accessoy Dwelling Units (ADUs).

**Action 9:** Amend the Zoning Code to address the following (By the end of 2020):

- Remove or provide an inclusive definition of family
- Update Density Bonus Ordinance
- Update the Accessory Dwelling Unit (Second Unit) Ordinance

# 6. Discriminatory Language in Real Estate Advertising

A review of advertisements for rental units and homes for sale was conducted as part of this Al preparation. A number of listings for rental units and for-sale homes include potentially discriminatory language, such as encouraging or discouraging family living. Some rental listings also indicated proof of income as a requirement. Several ads also were in Spanish only, violating the requirement to provide the same ad in English.

**Action 10:** Contract with the Fair Housing Council of Riverside County to monitor the advertising of for-sale and for-rent units. (Ongoing)

**Action 11:** Publicize fair housing rights and responsibilities on City website, newsletter, or other publications as a way of outreaching to landlords new to the rental business. (Ongoing)



**Action 12:** Outreach to the advertising departments of newspapers to encourage participation in fair housing workshops. (Ongoing)

# B. New Impediments Identified

## 1. Access to Opportunities

Based on the Affirmatively Furthering Fair Housing (AFFH) Tool data provided by HUD, Hispanic residents were more likely to be impacted by poverty, limited access to proficient schools, lower labor participation rate, and reliance on public transportation.

**Action 13:** The City will continue to pursue and expand economic development opportunities that would benefit all residents, but especially lower income residents. Job training and employment placement and support services would help reduce poverty among lower income residents and improve their access to opportunities. The City will continue to work toward the elimination of blight and enhancement of the economic base through collaboration with the Community Economic Development Corporation (CEDC). (Ongoing)



Signature Page	
	, hereby certify that this Analysis of Impediments to City of Perris represents the City's conclusions about impediments as actions necessary to address any identified impediments.
City Manager City of Perris	 Date



# **Appendix A: Summary of Public Outreach**

This Al Report has been developed to provide an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual's or a household's access to housing. As part of this effort, the report incorporates the issues and concerns of residents, housing professionals, and service providers. To assure the report responds to community needs, development of the Al includes a community outreach program consisting of a public workshop, stakeholder meeting, and a meeting of the City Council.

# A. Public Meetings

Perris residents and public and private agencies either directly or indirectly involved with fair housing issues in Perris were invited to attend a public were invited to attend a Community Workshop on January 10, 2019 at 6 PM at City Hall. The meeting provided the opportunity for the Perris community to gain awareness of fair housing laws, and for resident and service agencies to share fair housing issues and concerns. A second meeting for stakeholders was also held on January 10, 2019 at 2:30 PM at City Hall. This meeting was held specifically for housing professionals and service providers and gave them an opportunity to provide input on existing housing programs and assist in the development of new strategies to deal with any potential fair housing issues.



# 1. Community Workshop

A total of three participants attended the Community Workshop (6 PM) held on January 10, 2019 and provided the following input:

**Attendees:** Veronica Tam and Associates, Veronica Tam and Holli Anderson City of Perris, Sara Cortes de Pavon, Rebecca Rivera

### Participants:

• National Core: Tony Mize

• **SWAG:** Monica Sapien and Aaron Petroff

### **Discussion:**

### Homeless

- 1. Need for programs and services for homeless
  - a. Combine housing services together
  - b. Making services wrap around in order to help someone come out of homelessness instead of falling back into it
  - c. More supportive housing in closer proximity to the City
  - d. Get more non-profits involved in the area to help with the homeless

### Seniors

- 1. Need for programs and services for Seniors
  - a. Programs to educate seniors about fair housing



## 2. Consolidated Plan and Fair Housing Stakeholder Meeting

A total of 11 agencies attended the Stakeholder Meeting held on January 10, 2019 and provided the following input on fair housing issues in Perris:

**Attendees:** Veronica Tam and Associates, Veronica Tam and Holli Anderson City of Perris, Sara Cortes de Pavon, Rebecca Rivera

## Participants:

- Fair Housing Council: Johnnie B Jones, Kari Kalinich and Craig Oliver
- Enhance the Gift: Margaret Briggs
- Life Lifters International: Tracey Holcomb
- Family Service Association: Tom Donahue
- Boys and Girls Club of Menifee/Perris: Julia Burch
- Perris Valley Historical Museum: Midgie Parker and Katie Keejes
- Office of Senator Richard Roth: Carina Tamayo
- Riverside University Health Systems Behavioral Health: Cristine Lestage
- Office of Assembly member Jose Medina: Cesar Gomez
- Perris 5<sup>th</sup> Street Church: Mr. Forde
- Perris Valley Youth Association Sports: Andre Mitchell

### **Discussion:**

#### Seniors

- 1. Need for programs and services for Seniors
  - a. More programs are needed for the Senior Center
  - b. Too many of the programs have become redundant
  - c. Create programs that help bring in more of the senior community than those who already utilize the center
  - d. Programs that can help diversify the seniors who utilize the programs
  - e. Hold a Fair Housing workshop for seniors
  - f. Fit for 50 can be a program offered
  - g. Relocation service funds for finding new housing
  - h. Transportation for seniors to get to and from the senior center
- 2. Senior Center updates
  - a. Advisory committee for the senior center
  - b. Remodel of the Senior Center kitchen
  - c.

#### Homeless

- 1. Need for programs and services for homeless
  - a. Services geared toward helping homeless families find housing
  - b. Services that a family can use when they are going to be evicted
  - c. Relocation service funds for finding new housing
- 2. Need for emergency shelter or homeless shelter in the City
  - a. Emergency shelter or provisional housing for homeless



b. New regulations or a specific family shelter to help keep families who need temporary shelter together

## Youth **Youth**

- 1. Need for programs and services for youth
  - a. Activities to collectively gather youth in the City
  - b. Field trips for youth
  - c. Transportation services for youth to and from activities or to a specified center



# 3. Mailing List

To ensure that the fair housing concerns of low and moderate income and special needs residents were addressed, a copy of the public meeting notice was mailed to agencies and organizations that serve the low and moderate income and special needs community. The following agencies and organizations were contacted:

A-5



Housing Authority County of Riverside 5555 Arlington Ave. Riverside, CA 92504

Riverside County Sheriff's Department Homeless outreach team

> 137 North Perris Blvd., Perris, CA 92570

Riverside Dept of Public Social Services 371 Wilkerson Ave. Suite L, Perris, CA 92570

Eastern Municipal Water District 2270 Trumble Rd. Perris, CA 92570

KB Homes 36310 Inland Valley Drive Wildomar, CA 92595

Jamboree Housing Corporation 17701 Cowan Ave. Suite 200 Irvine, CA 92614

> Olson Company 3010 Old Ranch Parkwy Seal Beach, CA 90740

Wells Fargo Home Mortgage 36393 Riverside Plaza Drive, Suite 510 Riverside, CA 92506

> Bank of America 181 E. 4th St. Perris, CA 92570

Chase 26220 Iris Ave. Moreno Valley, CA 92555 Fair Housing Council of Riverside County

> 3933 Mission Inn Ave. Riverside, CA 92501

Riverside County Sheriff's Department Homeless outreach team

4060 County Circle Dr. Riverside, CA 92503

Riverside Transit Agency 1825 3rd St.

Riverside, CA 92507

Riverside County Economic Development Agency 1325 Spruce st. #110 Riverside, CA 92507

> 2202 30th St. San Diego, CA 92104

**Bridge Housing** 

MBK Homes Southern California 4 Park Plaza Suite 1000 Irvine, CA 92614

Riverside Housing Development Corporation 4250 Brockton Ave. Riverside, CA 92501

Wells Fargo Home Mortgage 2560 N. Perris Blvd., Perris, CA 92571

Bank of America 3150 Case Road, Bldg G Perris, CA 92570

Chase 31575 Canyon Estates Lake Elsinore, CA 92530 Path of Life Ministries 1240 Palmyrita Ave. Suite A, Riverside, CA 92507

Department of Public Social Services
Homless Program
4060 County Circle Drive
Riverside, CA 92503

Riverside County Superintendent of schools 3939 13th st.

Riverside, CA 92501 WRCOG

4080 Lemon st. 3rd Floor Ms 1032 Riverside, CA 92501

Habitat for Humanity 27479 Enterprise Circle West, Temecula, CA 92591

National CORE 9421 Haven Ave. Rancho Cucamonga, CA 91730

> TELACU Development 414 W. 4th St. Suite L Santa Ana, CA 92701

Wells Fargo Home Mortgage 1280 Corona Pointe Ct. Suite 120 Corona, CA 92879

> Chase 26750 McCall Blvd. Sun City, CA 92586

First Mortgage Corporation 3585 Mail St. Suite 206, Riverside, CA 92501



Alternatives to Domestic Violence First Mortgage Corporation 13800 PO BOX 910 13800 Heacock St. #C-234 Riverside CA 92523 Moreno Valley, CA 92553

> Grid Alternatives 1660 Spicago Ave M21 Riverside: EA 97507

Inland Gount Valving Services 1049 Jewe Anga Patte 109 Riverside: EA 92507

Aparthamikssacritta Astrideishde
21250 Box Springsidoad, Suite 212,
Moren Malgrolf Astrict
Riverside, CA 92504
Luther An Astrict Shrvices
2358035Um Trife at Blvd.
Morensidae (ASY 50853

Riverside / MATONAIP Stalify Health 6809 MATINAIP WEISE 101 Riverside, CA 92503

CENTURXULL Govern 30589/Nerrecola Parkway, Telhaecista, A.A.25592

Coldwell-BanklerbKiv/etterFixeters

PASSOCIATES

ASSOCIATES

310 Epflorida Aye\_Suite A,
Hemet, CA 92543

Restoring attopased and real mistate rvice Inc.
425 W/88 ideo Got Suite VA-7
Perris, CA 92571

Riverbide: Country Nealth Department 49651 Country Gas Dr. Riverbide, CA 92593 Community Action Partnership of Mountain West Financial Inc Riverside County 1209 Neveda St. Suite 200 2038 Iowa Ave. Suite B-102 Redlands, CA 92374 Riverside, CA 92507

Facilities find Ministries

1981 903 B. Carlayay S. Die 420

Warrang Yalley CA 923587

Telecare Corporation Mental Health Urgent care- Perris 6529 Riverside Ave #160, 85 Ramona Expressway Suites 1-3 Riverside, CA 92506 Perris, CA 92571

Apartmen শিক্ষার্চাটা Alba শুলাইবিদ Inland 3576 Arl Riges PAve. #206 8250 White Park Ayon yes Suite 100 Rancho Cucamonga, CA 91730

Cathedin Maritim Morean Valley Regional Office 26900 Newport Rd. Ste 120 23623 Sunneymead Blvd., Suite E Menifee, CA 92584 Moreno Valley, CA 92553

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1 South**WHE Pengram**s Business 308 E. Säffshlififo Ave. Perris, PAT 92570 Perris, CA 92570 Sigma Beta Xi
Citibank
12540 Heacock Street, Suite 5
27190 Suncity Blvd.
Moreno Valley 6292553

Moreno Valley Youth Opportunity Provident Savings Bank Center 5225 Canyon Crest Dr. 23080 Alesandro BLVD Suite 236 Milieri (예) 92592553

Inla Få V Filey i V secciário As SP rie i i Ros 21250 Bgg Springs Bard, Suite 212, Marcens Veillex GZ 885557

> Johanseawes Regiast 6700<u>andie</u>naona Suite 220 Bigassidea 62*676*06

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CENTERWZINFEREREd 25050 Missison Averste 101 Multeria, CA 92562

Coldwell **Banker Associated:** Brokers 2843 ty st. 28120; Bradley Bdo Sun City, CA 92586

Perris Valld M. Action Sports
420 E. Actions. 4728-A
Premiss CAA923702

Prudential/Galiformica/Breakty//Regional
P.O.Box 343
6349 Riverside Ave.
Perris, CA 92506
Riverside, CA 92506

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American Cancer Society 6355 Riverside Ave. Riverside, CA 92506

Lake Perris SRA 17801 Lake Perris Dr. Perris, CA 92571

Perris Elementary School District 143 E. 1st Street Perris, CA 92570

> The Perris Progress 277 E. 4th Street Sut. F Perris, CA 92570

Learning Edge Learning Center 24021 Alessandro Blvd. Suite 107A Moreno Valley, CA 92553

> Safe House 9658 Hayes Street Riverside, CA 92503

Rescare Workforce services 351 Wilkerson Ave. Suite. F Perris, CA 92570

Youth & Family Wellness Center of Perris 3040 Saffron Ct. Perris, CA 92571 Learn4Life 177 Holston Drive,

> Academic Advantage 24785 Chippendale Street Moreno Valley, CA 92553

Lancaster, CA 93535

Soroptimist International 303 Monument Parkway Perris, CA 92570

Family Service Association 21091 Rider St. Perris, CA 92570

Riverside and San Bernardino Counties Building and Construction Trades Council 1074 East La Cadena Dr. Ste. 8 Riverside, CA 92501

> The Concerned Family 18865 Clarke Street Perris, CA 92570

Oak Grove Center 24275 Jefferson Ave. Murrieta, CA 92562

Perris Valley Filipino American Association Inc. 82 Coliseum St. Perris, CA 92571

Ptown Combat Sports Academy 3110 Indian Ave, Perris, CA 92571

California Family Life Center
P.O. Box 727
Hemet, CA 92546

Million Kids
P.O. Box 7295
Riverside, CA 92513

Perris Valley Care Center 308 E. San Jacinto Ave. Perris, CA 92570 Big League Dreams 2155 Trumble Rd. Perris, CA 92570

Orange Empire Railway Museum 2201 S. A st Perris, CA 92570

Riverside County Sherrif Department 137 N. Perris Bl. Sut. A Perris, CA 92570

> Torres Martinez Tribal TANF 641 N. State Street, San Jacinto, CA 92583

Veterans of Foreign Wars Post 888 623 S. "D" Street, Perris, CA 92570

> Rescare Workforce services 351 Wilkerson Ave. Suite. F Perris, CA 92570

Boys & Girls Club of Menifee Valley
P.O. Box 2423
Menifee, CA 92586

Learn4Life 1695 Spruce Street, Suite 110 Riverside, CA 92507

Community Engagement Specialist
Educational Sevices
1151 N A St.
Perris, CA 92570
Perris Valley Chamber of Commerce

Perris Valley Chamber of Commerce 227 N. "D" Street Perris, CA 92570



Hospice of the Valleys 25240 Hancock Ave. Suite 120 Murrieta, CA 92562

> Riverside County 4080 Lemon st. Riverside, CA 92501

State of California, Department of

Rehabilitation
27555 Ynez Road, Suite 310
Temecula, CA 92591
Mt. San Jacinto College
28237 La Piedra Road,
Menifee, CA 92584

Perris Elementary School District 143 E. 1st St. Perris, CA 92570

> Val Verde School District 972 W. Morgan Street Perris, CA 92571

Riverside University Health System Behavioral Health 1820 N University Ave. Riverside, CA 92507

Riverside County Black Chamber of Commerce 2060 Chicago Ave. Suite A13 Riverside, CA 92507

New Life Fellowship Of Perris 1041 Davids Rd, Perris, CA 92571 Inland Regional Center 1500 Iowa Ave. Suite 100 Riverside, CA 92507

Southern California Fair 18700 Lake Perris Dr. Perris, CA 92571

5th District County of Riverside Supervisor 137 S. Perris Blvd. #137C Perris, CA 92570

Mt. San Jacinto Community College 1499 N. State St. San Jacinto, CA 92583

> Perris Union High School 155 E. 4th Street Perris, CA 92570

Val Verde School District 975 West Morgan Street Perris, CA 92571

Riverside University Health System Behavioral Health 3125 Myers Street, Riverside, CA 92503 Community Association of Perris P.O.Box 1659

Perris, CA 92572

Riverside County Public Health
Perris Family Care Center
308 E.San Jacino Avenue
Perris, CA 92570
California State Assembly District of
Jose Medina
1223 University Ave.

Congressman Mark Takano, 41st District 3403 10th St. #610 Riverside, CA 92501

Riverside, CA 92507

California State Senator Richard Roth 3737 Main Street Suite 104 Riverside, CA 92501

> Val Verde School District 975 West Morgan Street Perris, CA 92571

Val Verde School District 975 W. Morgan St. Perris, CA 92571

Riverside City College 4800 Magnolia Avenue Riverside, CA 92506

FreeIndeed Christian Fellowship 430 South D Street Perris, CA 92570



#### B. Stakeholder Questionnaire

In the event that they were unable to attend, all contacted agencies and organizations who were invited to participate at the Stakeholders Meeting on January 10, 2019 were also sent the following questionnaire to fill out and return to the City:

A-10



#### **Stakeholder Survey**

The City of Perris is seeking stakeholder input for its 2019-2024 Consolidated Plan. The plan is required by the U.S. Department of Housing and Urban Development (HUD), and serves to prioritize housing and community development needs and determine funding allocations for those needs. As a service provider for Perris residents, please tell us what you feel is important so that you can continue to provide necessary and critical services in the community. The survey should take less than 10 minutes to complete. Thank your for your time, participation, and feedback.

\* Required

1.	Organization/Business Name & Address *	
2.	Contact Name, Phone Number & Email Address	*
3.	Do you currently receive CDBG funding from the Check all that apply.	e City of Perris? *
	Yes, current sub-grantee  No, past CDBG sub-grantee	
	Agency has never received CDBG funding from	m the City of Perris

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10/29/2018	Stakeholder Survey
	4. Select the designation that best describes your agency. *  Check all that apply.
	Non-profit
	Community Housing Development Organization (CHDO)
	Developer
	Faith-based
	Local Business
	Charitable for-profit entity
	Government
	Education
	Other:
	5. Provide at least 1 improvement that you would like to see for the City CDBG program/policy. *  If you have never received CDBG funding, enter N/A.

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<ol> <li>What types of services does your agency provide? *         Check all that apply         Check all that apply.     </li> </ol>
Affordable housing advocacy
Affordable housing development
Affordable housing provision
Childcare
Credit Counseling/Foreclosure
Criminal Justice
Domestic Violence Services
Economic Development
Education
Emergency Assistance (not shelter)
Employment Training
Environmental Justice
Fair Housing
Food Assistance (including food pantry)
Government
Homeless Services
Home ownership counseling or services
Housing
Housing Rehabilitation
Insurance
Land use planning
Landlord/Tenant services
Legal Aid
Lending
Market Rate housing development
Mental Health Services
Property Management
Public Health services
Public Housing authority
Recreation
Residential appraisals
Senior Services
Services for people with HIV/AIDS
Services for immigrants or refugees
Services for Persons with Disabilities
Services for low income residents
Substance abuse services

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3/11



/29/2018	Stakeholder Survey
	Shelter - homeless
	Shelter - Crisis or domestic violence
	Option 40
	Translation Services
	Transportation
	Utilities
	Veterans services
	Youth services
	Other:
	7. What are the boundaries of service for your agency? *
	Check all that apply.
	Statewide
	Riverside County
	Other:
	How are clients referred to your agency? *     Select all that apply.
	Check all that apply.
	Government Agencies
	Community Organizations
	Newspapers
	Internet
	Outreach efforts
	Centralized Intake/ 211
	Other:
	9. What are the 3 greatest barriers faced by Perris residents attempting to obtain your agency
	services? *

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	List any critical issues facin	g servic	e provid		older Survey may pose		aints to t	he provi	sion o
	iocal services.								
11.	Estimate the percentage of y described by the 2018 HUD i							tegories	
		RIVERS	IDE COU	NTY 2018	Income Li	mits			
	Household Size								
	Extremely low	1	2	3	4	5	6	7	8
	Extremely-low (30% of MFI*)	\$14,150	\$16,200	\$18,200	\$20,200	\$21,850	\$23,450	\$25,050	\$26,
	Very-low Income	\$14,130	\$10,200	\$18,200	\$20,200	\$21,830	\$23,430	\$23,030	\$20,
	(50% of MFI*)	\$23,600	\$27,000	\$30,350	\$33,700	\$36,400	\$39,100	\$41,800	\$44,
	Low/Moderate Income			. ,					
	(80% of MFI*)	\$37,750	\$43,150	\$48,550	\$53,900	\$58,250	\$62,550	\$66,850	\$71,
	Rank the degree of need for Perris: * Mark only one oval per row.	each of No Need	Lo	w M	IBLIC IMF edium Need	PROVEM High Need	IENTS in Criti Nee	cal	Don
	Perris: * Mark only one oval per row.  Streets & Sidewalks	No	Lo	w M	edium	High	Criti	cal	of Don Knov
	Perris: * Mark only one oval per row.  Streets & Sidewalks Street Lighting	No	Lo	w M	edium	High	Criti	cal	Don
	Perris: * Mark only one oval per row.  Streets & Sidewalks Street Lighting Parks	No	Lo	w M	edium	High	Criti	cal	Don
	Perris: * Mark only one oval per row.  Streets & Sidewalks Street Lighting Parks Beautification/Enhanced Public Space	No	Lo	w M	edium	High	Criti	cal	Don
	Perris: * Mark only one oval per row.  Streets & Sidewalks Street Lighting Parks Beautification/Enhanced	No	Lo	w M	edium	High	Criti	cal	Don
	Perris: * Mark only one oval per row.  Streets & Sidewalks Street Lighting Parks Beautification/Enhanced Public Space Accessibility/Safety for Disabled Water/Sewer Improvements	No Need	Lo	w M	edium	High	Criti	cal	Don
	Perris: * Mark only one oval per row.  Streets & Sidewalks Street Lighting Parks Beautification/Enhanced Public Space Accessibility/Safety for Disabled Water/Sewer Improvements Senior Center	No Need	Lo	w M	edium	High	Criti	cal	Don
	Perris: * Mark only one oval per row.  Streets & Sidewalks Street Lighting Parks Beautification/Enhanced Public Space Accessibility/Safety for Disabled Water/Sewer Improvements	No Need	Lo	w M	edium	High	Criti	cal	Don

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Food Banks

Disables Accessibility of Public Facilities



4. Think about the Downtown challenges have you experie	('D' St.) re	vitalization	. What would	d you like t	o see includ	ded? What
5. Rate the degree of need for	each of the	e following	PUBLIC SE	RVICES in	the City of F	Perris: *
Mark only one oval per row.	No	Low	Medium	High	Critical	Don't
	Need	Need	Need	Need	Need	Know
Youth Services	9	9	9	$\sim$	$\sim$	$\sim$
Childcare Services	8	8	8	8	8	8
			000			8
Childcare Services Services for persons with	0000	0000				
Childcare Services Services for persons with Disabilities		0000				
Childcare Services Services for persons with Disabilities Senior Services	00000	000000				
Childcare Services Services for persons with Disabilities Senior Services Health services						
Childcare Services Services for persons with Disabilities Senior Services Health services Mental Health Services Employment Training Fair Housing						
Childcare Services Services for persons with Disabilities Senior Services Health services Mental Health Services Employment Training						
Childcare Services Services for persons with Disabilities Senior Services Health services Mental Health Services Employment Training Fair Housing Credit Counseling/Foreclosure Prevention Crisis Intervention						
Childcare Services Services for persons with Disabilities Senior Services Health services Mental Health Services Employment Training Fair Housing Credit Counseling/Foreclosure Prevention Crisis Intervention Emergency Shelter for Homeless						
Childcare Services Services for persons with Disabilities Senior Services Health services Mental Health Services Employment Training Fair Housing Credit Counseling/Foreclosure Prevention Crisis Intervention Emergency Shelter for Homeless Emergency Shelter for Domestic Violence Victims						
Childcare Services Services for persons with Disabilities Senior Services Health services Mental Health Services Employment Training Fair Housing Credit Counseling/Foreclosure Prevention Crisis Intervention Emergency Shelter for Homeless Emergency Shelter for Domestic Violence Victims Information & Referral						
Childcare Services Services for persons with Disabilities Senior Services Health services Mental Health Services Employment Training Fair Housing Credit Counseling/Foreclosure Prevention Crisis Intervention Emergency Shelter for Homeless Emergency Shelter for Domestic Violence Victims Information & Referral Substance Abuse Services						
Childcare Services Services for persons with Disabilities Senior Services Health services Mental Health Services Employment Training Fair Housing Credit Counseling/Foreclosure Prevention Crisis Intervention Emergency Shelter for Homeless Emergency Shelter for Domestic Violence Victims Information & Referral Substance Abuse Services Food Assistance						
Childcare Services Services for persons with Disabilities Senior Services Health services Mental Health Services Employment Training Fair Housing Credit Counseling/Foreclosure Prevention Crisis Intervention Emergency Shelter for Homeless Emergency Shelter for Domestic Violence Victims Information & Referral Substance Abuse Services						

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18.	Rate the degree of need for ea City of Perris: * Mark only one oval per row.						
		No Need	Low Need	Medium Need	High Need	Critical Need	[ k
	Job Development/Creation						- (
	Small Business Loans	>	$\prec$	$\prec$	$\prec$	$\overline{}$	- (
	Storefront Improvements	>	$\prec$	$\overline{}$	$\sim$	$\prec$	- (
	Property Cleanup	>	>	$\rightarrow$	=	$\equiv$	- (
	Technical Assistance to	$\sim$			$\sim$		,
	Small Businesses		$\bigcirc$	$\bigcirc$			(
	Attraction of new businesses						(
	Retention of existing						(
	busineses						
	Expansion of existing businesses						(
	Provision of job training						(
	Provision of job re-training,						
	such as after business closure						
	Enhancement of business infreastructure						(
	Provision of venture capital	$\overline{}$	$\overline{}$	$\overline{}$	$\overline{}$	$\overline{}$	- (
	Development of business	$\Rightarrow$	$\rightarrow$	$\overline{}$	$\rightarrow$	$\overline{}$	
	incubators	$\bigcirc$	$\bigcirc$	$\bigcirc$			{
	Development of business parks						(
	Foster businesses with high paying jobs						(

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Rate the degree of need for ea Mark only one oval per row.	ich of the	e following	J HOUSING s	services in	the City of F	erris: *
	No Need	Low Need	Medium Need	High Need	Critical Need	Don Kno
Interim Housing (Emergency Shelter and Transitional Housing)						
Permanent Supportive Housing						
Senior Housing Housing for Persons with						
Addictions						
Housing for Persons with HIV/AIDS						
Housing for Persons with Developmental Disabilities						
Housing for Persons with Mental Illness						
Housing for Persons with Functional Disabilities						
Housing for Victims of Domestic Violence						
Housing for Migrant Farm Workers						
Housing for Homeless Youth						
Construction of new affordable for-sale housing						
Construction of new affordable rental housing						
Housing for Low-Income households						
Rental Assistance						
Mixed use housing						
Downtown housing						



	Emergency Shelter for homeless/homeless shelter
П	Homeownership opportunitites
П	Housing for adults with criminal (felony) history
$\overline{\Box}$	Permanent housing solutions for chomic homelessness
$\overline{\Box}$	Housing for other homeless populations
	Housing for Low-income households
	Housing for persons with cognitive disabilities
	Housing for persons with HIV/AIDS
	Housing for persons with physical disability
	Housing for persons with serious mental illness
	Housing for seniors
	Housing rehabilitation
	Housing for families
	Housing for persons with addictions
	Youth Shelters
	Workforce housing
	Other:

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	development and/or its location? *	
C	Select all that apply. Check all that apply.	
	Land use policies	
	Zoning	
	Occupancy standards	
	Health and safety codes	
	Property tax policies	
	Housing construction standards	
	Neighorhood or community development polici	es
	Limited access to government services, such a	as employment services
	Public administrative actions or regulations	
	NIMBY (Not In My Back Yard) mentality	
	Building codes/ practices	
	Building inspection services	
	The use of crime statistics/police and highway	reports
	School enrollment/graduation statistics	
	Other:	
	Other:  For any of the barriers you selected above, please think the City of Perris can overcome it.*	se describe the barrier and the best way you

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Select all that apply Check all that apply.  Men  Women  Veterans  Families  Youth - general  Youth transitioning out of foster care  Chronic Homeless  Other:  29. Rate the degree of need for each of the following services for Homeless individuals in the of Perris: *  Mark only one oval per row.  No  Low  Need
Women  Veterans  Families  Youth - general  Youth transitioning out of foster care  Chronic Homeless  Other:  29. Rate the degree of need for each of the following services for Homeless individuals in the of Perris: *  Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Need Known Need Need Known Need Need Known Need Need Need Need Need Known Need Need Need Need Need Need Need Nee
Veterans Families Youth - general Youth transitioning out of foster care Chronic Homeless Other:  29. Rate the degree of need for each of the following services for Homeless individuals in the of Perris: *  Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Known Need Need Known Need Need Known Need Need Known Need Need Need Known Need Need Need Need Need Need Need Nee
Veterans Families Youth - general Youth transitioning out of foster care Chronic Homeless Other:  29. Rate the degree of need for each of the following services for Homeless individuals in the of Perris: * Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Known Need Need Known Need Need Known Need Need Known Need Need Need Known Need Need Need Need Need Need Need Nee
Families  Youth - general  Youth transitioning out of foster care  Chronic Homeless  Other:  29. Rate the degree of need for each of the following services for Homeless individuals in the of Perris: *  Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Known Need Need Known Need Need Known Need Need Known Need Need Need Known Need Need Need Need Known Need Need Need Need Need Need Need Nee
Youth - general Youth transitioning out of foster care Chronic Homeless Other:  29. Rate the degree of need for each of the following services for Homeless individuals in the of Perris: *  Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Known Need Need Known Need Need Known Need Need Need Known Need Need Need Need Need Need Need Nee
Youth transitioning out of foster care Chronic Homeless Other:  29. Rate the degree of need for each of the following services for Homeless individuals in the of Perris: *  Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Need Known Need Need Known Need Need Need Known Need Need Need Need Need Need Need Nee
Chronic Homeless  Other:  29. Rate the degree of need for each of the following services for Homeless individuals in the of Perris: *  Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Known Need Need Known Need Need Known Need Need Known Need Need Need Known Need Need Known Need Need Need Known Need Need Known Need Need Need Need Known Need Need Need Need Need Need Need Nee
29. Rate the degree of need for each of the following services for Homeless individuals in the of Perris: *  Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Need Known Need Need Need Need Need Need Need Nee
29. Rate the degree of need for each of the following services for Homeless individuals in the of Perris: *  Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Need Known Need Need Need Known Need Need Need Need Need Need Need Nee
of Perris: *  Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Need Know Standard Sta
of Perris: *  Mark only one oval per row.  No Low Medium High Critical Do Need Need Need Need Know Standard Sta
Case Managment/Life Skills
Substance Abuse Treatment
Mental Health Care
Physical Health Care
(medical, dental, etc)
Legal O O O O
ROW 7

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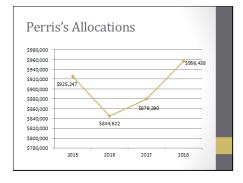
#### C. Outreach Material and Sign-In Sheets

2/10/19

Consolidated Plan and Fair Housing Workshop

#### What is the Consolidated Plan?

- A Consolidated Plan is required in order to receive Community Development Block Grant (CDBG) funds from HUD.
- 5 Year strategic Plan
- Analysis of housing and community development needs
- Strategy (projects and programs) to address those needs



#### Potential Uses of CDBG Funds

- · Eligible activities and projects include:
- · Creation and retention of affordable housing
- Infrastructure improvements
- Community facilities
- Community services
- Special needs servicesJob creation and retention



#### **Previous Projects**

- Perris Employment Program
- FSA- More Than a Meal (Senior Nutrition Program)
- Sidewalk and Pedestrian Ramp Improvements Citywide
- Senior Center Renovations
- Perris Valley Youth Association Mentoring Program



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#### 2/10/19

#### Why Develop an AI?

- Required by HUD to receive CDBG and other federal funding
- HUD programs must be administered to "affirmatively further fair housing"
- Conduct Analysis of Impediments to Fair Housing Choice
- Take actions to overcome impediments
- · Maintain records on analysis and actions

#### What is in the AI?

- Demographic and housing characteristics
- Practices in the housing market
- Patterns and trends of housing discrimination
- Public policies and regulations regarding housing choice
- · Fair housing services and resources available
- Issues and recommendations

#### Fair Housing Definition

- Fair housing describes 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 protected class status.
- Prohibits discrimination in housing choice because of protected class status

#### Fair Housing: Protected Classifications

#### Federal Marital Status

- Race
  Color
  National Origin
  Disability: Mental & Physical
  Religion
  Sex
- Religion
   Sex
   Familial Status (Under 18)

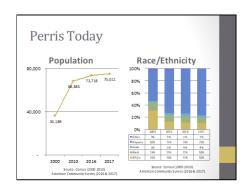
#### State

- Ancestry
  Source of Income
  Sexual Orientation
- Sexual orientation.

  Age
  Arbitrary: Physical Characteristics
  Gender Identity
  Citizenship
  Primary Language
  Immigration Status
  Student Status (Los Angeles)

#### What is not Fair Housing?

- Affordability
- Low income is not a protected class
- · Affordability issues are not fair housing issues, unless affordability disproportionately impacts a protected class
- Tenant/Landlord Issues
- Tenant/landlord disputes are not fair housing issues, unless the disputes are based on protected classes



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#### 2/10/19





#### **Discussion Topics**

- Community Needs and Priorities
- Housing Types
- Business and Economic Development
- Infrastructure
- Community and Public Facilities
- Human and Public Services
- Ideas to further promote fair housing?







# **Consolidated Plan and Fair Housing Meeting** Thursday, January 10th, 2019, 6:00 PM

Sign-In Sheet				
Print Name	Organization	Address	Email	Telephone No.
7BNY M126.	NATIONALCORE	9421 HAVED R.C.	5.	1 (969)727-2782
Monica Sapier	SMIAC 28497 Har 774 Hairs Monic for this was c	28497 HM 74 #613	Monic of this was ord	951.202:2954
Harm throth	SIMPR	WHE ERSINGE GESZZ ARVING HOSING	Answar the said of	May 051 49 10 87/2
		**************************************		

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## City of Peri

Consolidated Plan and Fair Housing Stakeholder Meeting Thursday, January 10<sup>th</sup>, 2019, 2:30 PM

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1909 633-84,58	pernis, pastorpana;	300 F. 5th St. Perris perris, paster June	Kerris 5th St. Church	Wate Fork
1 951-364-6649	Cesar gonez @ asmin, gov	Suite 20, Biversity Ave	Asm Jose Medina	Cesar Gomez
			City of Pany	KEDGERA KINEVA
ng 951-358-3862	CLESTAGEORUHACH	RUHS BEHAVIORAL HATH 305 MICRO STORISME	RUHS BEHAVIORAL HA	ORISTINE LESTAGE
(951) 480-6750	arina tamaya wson.ca.gov	Tomoryo Office of Schoolin Limbard Rotty Financia (18 7250)	Office of Schools Lichard Ros	Carina Tamayo
		USEUM RUMOLAND CAPISS	PERRIS VALLEY HISTORICAL MI	Suite Heefer
hus 951-657-5	Tomand midgice Value 951-657-5027	21621 Webster Former	Midgie Farker Ferris Lally Museum 21621 Websty For	Midgie Parker
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### Notice of Community Planning Meeting

#### The City of Perris wants to hear from you!

Please join community members, housing professionals, and service providers to discuss the needs of the low and moderating income community and to explore the issue of fair housing in the City of Perris. Your input will help set the priorities for the use of CDBG funding for the next five years and identify any impediments to fair housing choice.

The meeting is scheduled for:

#### Thursday, January 10th at 6:00 PM

City of Perris Council Chambers 101 North D. Street Perris, CA 92570

The city will be providing Spanish interpretation and there will be childcare available for kids who are potty trained

Also, check out our online resident survey by scanning the QR code with your smartphone camera! The survey can also be reached by visiting the City of Perris website under "City Announcements"



If you prefer to make written comments they may be sent to:

City of Perris Attn: Sara Cortes de Pavon 101 North D. Street Perris, CA 92570

For additional information or to request a reasonable accommodation, please contact Sara Cortes de Pavon at <a href="mailto:scortes-depavon@cityofperris.org">scortes-depavon@cityofperris.org</a> or 951-435-6100 ext. 254.



#### Consolidated Plan and Fair Housing Meeting

#### Thursday, January 10th at 2:30 PM

City of Perris Council Chambers 101 North D. Street Perris, CA 92570

The City of Perris invites you to participate in a Stakeholder meeting to discuss the needs of the low and moderate-income community and to explore the issue of fair housing with other professionals and service providers. Your input will help set the priorities for the use of CDBG funding for the next five years, and identify any impediments to fair housing choice. You may also join us for the community meeting that begins at 6:00 PM in the Council Chambers.

Also, please help us out by completing our online survey!
Use your smartphone camera to scan the QR code on the right to be taken to the stakeholder survey



For more information or if you are in need of a reasonable accommodation, please contact: Sara Cortes de Pavon at <a href="mailto:scortes-depavon@cityofperris.org">scortes-depavon@cityofperris.org</a> or 951-435-6100 ext. 254



#### D. Community Needs Survey

The City of Perris developed a survey to learn about community needs and to also gauge the perception of fair housing needs and concerns of residents. The survey was offered online in both English and Spanish on SurveyMonkey and paper copies were also available at the City's gym, senior center and Development Services Counter. The survey remained open until February 2019



#### **Resident Survey**

The City of Perris is developing a five-year plan to guide policy, action, and investment for housing, economic development, infrastructure, and community and public facilities over the next several years. Known as the Consolidated Plan, it is required by the U.S. Department of Housing and Urban Development (HUD), and serves to prioritize housing and community development needs and determine funding allocations for those needs. As a Perris resident, please tell us what you feel is important in your neighborhood and community. Your survey responses will remain anonymous and this effort should take less than 10 minutes to complete. Thank your for your time, participation, and feedback.

\* Required

Select which neig     Mark only one oval	hborhood in the City of Perris you reside in: *
Avelena	
Classic Pac	ific
Oowntown F	Perris
Enchanted I	Hills
Green Valle	у
May Ranch	
Monument I	Ranch
Villages of A	Avalon
ONot a Perris	Resident
Other:	

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#### 2. Please rate the degree of need for each of the following HOUSING activities in the City of Perris: $^{\ast}$

Special needs housing asked separately below. Mark only one oval per row.

	No Need	Low Need	Medium Need	High Need	Don't Know
Construction of new affordable for-sale housing					
Construction of new affordable rental housing					
First time homebuyer assistance					
Rental assistance					
Homeowner housing rehabilitation					
Rental housing rehabilitation					
Energy efficient retrofits					
Housing demolition					
Downtown housing					
Mixed use housing					
Retrofitting existing housing to fit seniors' needs					
Preservation of federal subsidized housing					
Supportive housing for people whoa re homeless or disabled					
Rental housing for very-low to low-income households					

Are there any other type of Housing activities y listed? If so, please describe below and identify	
Do not include Special Needs housing activities.	



4. Rate the degree of need for each of the following SPECIAL NEEDS HOUSING in the City of Perris: \*

Mark only one oval per row.

	No Need	Low Need	Medium Need	High Need	Don't Know
Homeless Shelters					
Emergency Shelters					
Transitional Housing					
Shelters for Youth					
Senior housing, such as nursing homes or assisted living facilities.					
Housing designated for persons with disabilities					
Permanent supportive housing, such as subsidized housing that offers services for persons with mental disabilities					
Rapid rehousing rental assistance for homeless households					

i.	Are there any other type of Special Needs Hou previously listed? If so, please describe below be?



#### 6. Rate the degree of need for each of the following BUSINESS & ECONOMIC DEVELOPMENT activities in the City of Perris: $^{\ast}$

Mark only one oval per row.

	No Need	Low Need	Medium Need	High Need	Don't Know
Attraction of new businesses					
Retention of existing businesses					
Expansion of existing businesses					
Business Support Services					
Provision of job training					
Provision of job re-training, such as after business closures		Ö			
Enhancement of business infrastructure					
Provision of working capital for businesses					
Provision of technical assistance & capacity building for businesses					
Investment as equity partners					
Provision of venture capital					
Development of business incubators					
Development of business parks					
Foster businesses with high paying jobs					
Commercial rehabilitation					
Neighborhood based small businesses					

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8. Rate the degree of need for each of the following INFRASTRUCTUR	E activities in the City of
Perris: *	

Mark only one oval per row.

	No Need	Low Need	Medium Need	High Need	Don't Know
Street and road improvements					
Street Lighting					
Sidewalk improvements					
Water system capacity improvements					
Water quality improvements					
Sewer system improvements					
Bicycle and walking paths					
Accessibility improvements (ADA)					
Public Transit					
Infrastructure for Internet Access					

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Are there any other type of Inf previously listed? If so, please be?				

#### 10. Rate the degree of need for each of the following COMMUNITY & PUBLIC FACILITIES in the City of Perris: $^{\star}$

Mark only one oval per row.

	No Need	Low Need	Medium Need	High Need	Don't Know
Youth Centers					
Community Centers					
Childcare facilities					
Parks & recreation centers					
Senior Centers					
Healthcare facilities					
Residential treatment centers					
Public buildings with improved accessibility					

1. /	Are there any other type of Community and
F	Public Facilities you are considering that was
r	not previously listed? If so, please describe
k	pelow and identify the need level you consider
i i	t to be?

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12. Rate the degree of need for each of the following HUMAN & PUBLIC SERVICES in the City of Perris: \*

Mark only one oval per row.

	No Need	Low Need	Medium Need	High Need	Don't Know
Youth Services					
Senior Services					
Veteran services					
Transportation services					
Healthcare services					
Childcare services					
Fair Housing activities					
Fair Housing education					
Tenant/Landlord counseling					
Home-buyer education					
Crime awareness education		$\overline{}$			
Mitigation of lead-based paint hazards					
Mitigation of asbestos hazards					
Employment services					
Youth employment					
Mental health/chemical dependency services					
Domestic Violence services					
Code enforcement					
Clean up of abandoned lots and buildings					
Services for persons recently released from jail/prision					
Education					
Life Skills					

13.	Are there any other type of Human & Public Services you are considering that was not previously listed? If so, please describe below and identify the need level you consider it to be?				



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