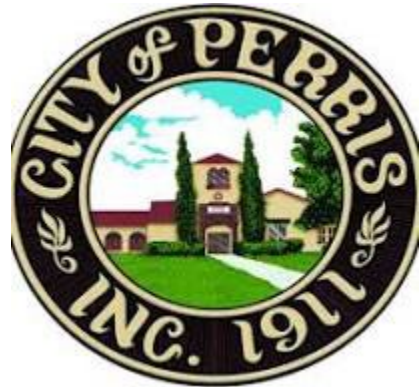


# City of Perris

## Analysis of Impediments to Fair Housing Choice 2024



City of Perris  
101 North D Street  
Perris, CA 92570





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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. Between 2010 and 2020, the Perris population grew another 15.08 percent with 78,700 residents. 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 increased another 10.44 percent between 2010 and 2020.

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 and Guidance**

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Fair Housing Act Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).

Title VIII was amended in 1988 (effective March 12, 1989) by the Fair Housing Amendments Act. In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.

Title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973. Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of the Housing and Community Development Act of 1974. Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990. Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968. The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975. The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972. Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.



## **Fair Housing Related Presidential Executive Orders**

Executive Order 11063. Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246. Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892. Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898. Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166. Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.

Executive Order 13217. Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

## **HUD Fair Housing Guidance**

### ***Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records***

The Fair Housing Act prohibits discrimination in the sale, rental, financing of dwellings and in other housing-related activities on the basis of race, color, religion, sex, disability, familial status or national origin. In April 2016, HUD's Office of General Counsel issued guidance on the discriminatory effect of using criminal history to make housing decisions. If a policy or practice that restricts access to housing on the basis of criminal history has a disparate impact on a protected class (whether or not that effect is intentional), it is in violation of the Fair Housing Act – unless there is a “substantial, legitimate, nondiscriminatory interest” served by the policy.

While it is impossible to know the precise number of people transitioning from a correctional facility at any one point in time, the ability to access safe, secure and affordable housing is critical for a formerly incarcerated person's reintegration into society. HUD's guidance is intended to eliminate barriers to securing housing for that population, and jurisdictions can assist by making a clear effort to eliminate any discriminatory barriers these individuals may face. For former inmates to avoid recidivism and work in society, they must have access to housing free of discrimination.





### ***Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity***

On September 21, 2016, HUD published a final rule entitled “Equal Access in Accordance with an Individual’s Gender Identity in CPD programs.” Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity for all HUD funded programs. This rule builds upon the 2012 final rule, “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity” (2012 Equal Access Rule). This final rule ensures that HUD’s housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status.

Furthermore, as HIV/AIDS disproportionately affects the LGBT community, it is important to note that HIV/AIDS is protected under the Fair Housing Act as a disability. HUD specifically states that housing discrimination because of HIV/AIDS is illegal.

The HUD Office of Policy Development and Research conducted a study in 2013, *An Estimate of Housing Discrimination Against Same-Sex Couples*, as the first large-scale, paired-testing study to assess housing discrimination against same-sex couples in metropolitan rental markets via advertisements on the Internet. Two emails were sent out, with the only difference between the two emails was the sexual orientation of the prospective renting couples. The study finds:

“[... same-sex couples experience less favorable treatment than heterosexual couples in the online rental housing market. The primary form of adverse treatment is that same-sex couples receive significantly fewer responses to e-mail inquiries about advertised units than heterosexual couples. Study results in jurisdictions with state-level protections against housing discrimination on the basis of sexual orientation unexpectedly show slightly more adverse treatment of same-sex couples than results in jurisdictions without such protections. “

### **June 2015 Supreme Court Ruling on Fair Housing**

On June 25, 2015, the Supreme Court handed down a landmark fair housing ruling that upheld the ability to bring “disparate impact” claims under the Fair Housing Act. The Fair Housing Act of 1968, an integral legislative victory of the Civil Rights Movement, protects people from discrimination when they are renting, buying or securing financing for housing. The case, *Texas Department of Housing and Community Affairs v. Inclusive Communities Project*, centered on the question of whether a policy or action has to be intentionally discriminatory, or merely have a discriminatory effect, in order to qualify as a valid basis for a discrimination claim under the Act.

Inclusive Communities, a Dallas-based non-profit, claimed that the Texas Department of Housing and Community Affairs was guilty of housing discrimination because the way in which the state allocated Low Income Housing Tax Credits perpetuated racial segregation by limiting the development of affordable housing into areas that were historically impoverished with high concentrations of minorities. The state claimed that no discrimination occurred because its intention was not to promote racial segregation but to revitalize these underserved areas by injecting much needed capital for the development of new affordable housing. Inclusive Communities claimed that regardless of intention, the state’s decision to fund tax-credit projects only in minority and poverty-laden neighborhoods resulted in segregation, and thus had a discriminatory effect (disparate impact).

Fair housing advocates across the nation watched the case closely and worried if the Supreme Court ruled



against disparate impact claims that it would essentially “defang” the Fair Housing Act by removing a key basis for liability. Intent is much harder to prove than effect. In the end the Court ruled 5-4 to uphold the lower court decisions in favor of Inclusive Communities, salvaging fair housing disparate impact claims.

## 2. California Laws

The State Civil Right Department 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 against housing discrimination by FEHA:

- Race
- Color
- Ancestry
- National origin
- Citizenship\*
- Immigration status\*
- Primary language\*
- Religion
- Disability (mental or physical)
- Sex and gender
- Sexual orientation
- Gender Identity
- Gender Expression
- Genetic information
- Marital status
- Familial status (families with children under 18 or people who are pregnant)
- Source of income (including the use of government rental assistance such as a Section 8 Housing Choice voucher)
- Military or veteran status
- Age\*

*\* If a housing provider qualifies as a business, these characteristics would also be protected under the Unruh Civil Rights Act.*

In addition, the FEHA contains similar reasonable accommodations and accessibility provisions as the federal Fair Housing Amendments Act and prohibits retaliation against someone for exercising their rights. FEHA also provides protections for people and circumstances related to protected characteristics, including:



1. [the right to operate a licensed family childcare in a provider's home](#)
2. [specific protections for people with criminal histories who are searching for housing](#)

The law applies to landlords, tenant screening companies, property management companies, real estate agents, home sellers, builders, mortgage lenders, housing authorities, and others. The law applies to all aspects of housing and housing-related services, such as renting, leasing, sales, new construction, mortgage lending, insurance, municipal services, shelters, advertising, and restrictive covenants. Additionally, it is unlawful for cities, counties, or any local government agency to make zoning, land-use decisions, or policies that discriminate based on a protected characteristic.

Examples of actions that could be discriminatory if based on a person's protected characteristic:

- Refusal to sell, rent, or lease rooms, apartments, mobile homes, condos, or houses
- Refusal to negotiate for the sale, rental, or lease of housing
- Informing someone that an apartment is not available for inspection, sale, or rental when it is in fact available
- Denial of a home loan or homeowner's insurance
- Cancellation or termination of a sale or rental agreement
- Refusal to permit, at a disabled tenant's expense, reasonable modifications – such as adding a ramp, widening a doorway, or installing a safety bar in a shower – when necessary to accommodate a disability
- Refusal to make reasonable accommodations in housing rules, policies, practices, or services where necessary to provide a disabled person equal opportunity to use and enjoy a dwelling
- Rules that restrict only on families with children, such as a prohibition against children using an on-site pool or playing in common areas of an apartment complex
- Refusing to rent to a tenant with a section 8 voucher.
- Not complying with the requirements of a rental assistance or subsidy program (such as section 8) by refusing to complete required forms, sign documents, or allow inspections
- Refusing to rent to anyone with a criminal history
- Screening prospective tenants – including when done by a third-party such as a tenant screening company – in a way that discriminates based on a protected characteristic
- Retaliation against someone because they filed a complaint with CRD, requested a reasonable accommodation for a disability, or otherwise tried to protect their rights to be free from housing discrimination

California law protects individuals from illegal discrimination and harassment by housing providers based on certain protected characteristics, whether or not someone actually has that characteristic or is perceived to have it. The law also protects against discrimination and harassment that is based on more than one, or intersecting, characteristics. Finally, California law protects people from discrimination and harassment that is based on the protected characteristic of their family member, friend, roommate, or any other associate.

Other laws that offer protection against discrimination follow:

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.<sup>1</sup> 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.*

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.

<sup>1</sup> <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.

### **Background on AI Requirements**

In 2015, HUD released a new AFFH rule, which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH. The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive well, including quality employment, good schools, affordable housing, efficient public transportation, safe streets, good services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.



The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy. Together, these considerations were then intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, focus groups, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues/impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the City of Perris certifies that it will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice, and maintaining records that reflect the analysis and actions taken in this regard.



## 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 and American Community Surveys
- City of Perris Housing Element
- City of Perris General Plan
- City of Perris Zoning Code
- Home Mortgage Disclosure Act (HMDA) data regarding lending patterns
- Perris Consolidated Plan



## **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.

## **G. Public Meetings**

As part of the planning process, the City of Perris consulted with a wide variety of organizations to gain understanding of housing and community development needs. Through the Community Needs Workshop, Community Stakeholder Workshop, and 14 stakeholder consultations, a wide variety of organizations were consulted with to better understand the housing and community development needs in the city. Invitations for consultations were sent to identified key stakeholders. Additional input on the development of the plan was gathered from a city-wide survey that generated 457 responses. Comments on the draft AI were obtained at a public hearing and through the 30-day public comment period. The final AI reflects comments obtained through these efforts, along with analyses of local, state, and national data and local plans and reports.

In order to perform outreach to various agencies and organizations, the City compiled an outreach list consisting of various agencies, including:

- Nonprofit service providers that cater to the needs of low and moderate income households and persons with special needs, including persons with disabilities;
- Affordable housing providers;
- Housing advocates;
- Housing professionals;
- Public agencies;
- Economic development and employment organizations; and
- Community and neighborhood groups.

## **H. Public Review**

The City offered a 30-day public review period from May 8 through June 11, 2024.

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/>

## **I. Public Hearings**

The City conducted a public hearing on June 11, 2019.



## II. Community Profile

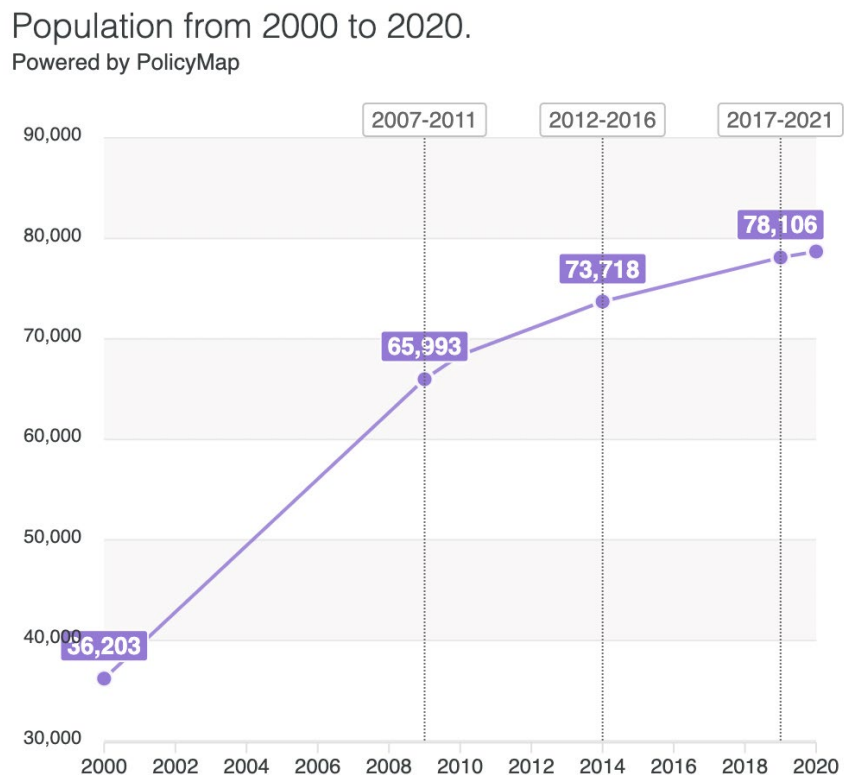
A key fair housing goal is to foster an inclusive environment where all people can find adequate and suitable housing. This chapter provides an overview of Perris’ residents and housing stock, including population, economic, and housing trends which help to identify housing needs specific to Perris.

### A. Demographic Profile

This section provides a breakdown of Perris’ demographic characteristics to examine the future needs and current access to equal housing choice. 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

Perris is a rapidly growing city and has seen a large increase in population over the past two decades. 2017-2021 ACS population estimates revealed a 6% growth from the 2012-2016 estimate:



According to Census data, the population of Perris saw about a 15 percent increase between 2010 and 2020 – higher than Riverside County’s growth of around 10.5 percent and more than double California’s growth statewide. As the city’s population continues to grow, there will be a need for additional affordable

housing and an increased strain on the housing stock in Perris.

**Table 1. Changes in Population**

POPULATION	2000	2010	2020	Change 2010-2020 (%)
Area	36,203	68,386	78,700	15.08%
Counties	1,545,387	2,189,641	2,418,185	10.44%
State	33,871,648	37,253,956	39,538,223	6.13%

## 2. Age Characteristics

ACS data reports that the median age in Perris in 2022 was almost 31 years old. Comparatively, the median age in 2015 was nearly 27 years old. The City of Perris has seen its older population continue to increase over the past decade. Table II below shows that between 2010-2015, those aged 45-54 saw the highest increase in population, whereas between 2015-2022, those aged 65-74 saw the highest increase at 2.5%, closely followed by those aged 55-64 at 2.4%. The population of those younger than 25 has been decreasing since 2015, while those aged 45 or older has been steadily increasing. As the older population age groups continue to grow, there will be a need for additional affordable housing options for seniors. The map below shows that the highest concentrations of those aged 65 or older between 2018 and 2022 were in the southern part of the city, along with an area in the western central part of the city. Creating affordable housing options in areas of the city that have higher concentrations of the elderly population would be beneficial.

**Table 2. Age Characteristics**

Age	2010 ACS Estimates	2015 ACS Estimates	Change in Percentage 2010-2015	2022 ACS Estimates		Change in Percentage 2015-2022
	% of Total	% of Total		Population	% of Total	
Under 5	9.6%	8.7%	-0.9%	4,928	6.1%	-2.6%
5-14	20.6%	20.0%	-0.6%	14,912	18.6%	-1.4%
15-24	16.9%	18.6%	1.7%	13,596	16.9%	-1.7%
25-34	14.5%	14.1%	-0.4%	12,638	15.7%	1.6%
35-44	17.7%	14.1%	-3.6%	9,706	12.1%	-2.0%
45-54	10.6%	13.1%	2.5%	11,150	13.9%	0.8%
55-64	6.3%	6.0%	-0.3%	6,735	8.4%	2.4%
65-74	2.1%	3.3%	1.2%	4,637	5.8%	2.5%
75-84	1.6%	1.5%	-0.1%	13,69	1.7%	0.2%
5 or older	0.2%	0.6%	0.4%	587	0.7%	0.1%

### 3. Race and Ethnic Characteristics

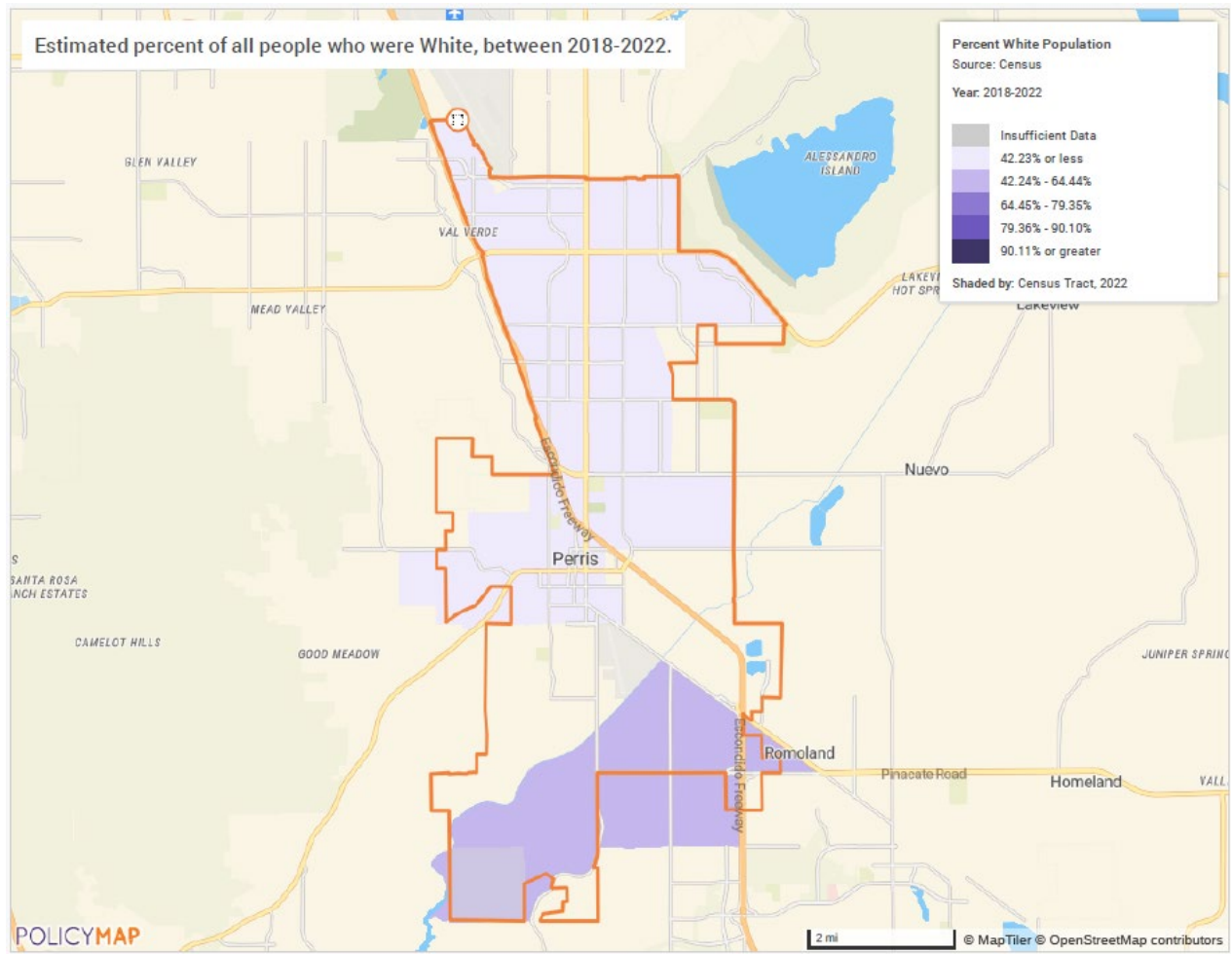
Between 2010 and 2022, the racial and ethnic compositions of the city have shifted. There has been a significant decrease in the White population, decreasing by nearly 30% of the total population between 2010 and 2022. The Black or African American population has been slowly increasing over the past decade, seeing a 5.5% increase since 2010 and almost matching the White population in total percentage of the population. All other racial categories have remained comparatively consistent between 2010 and 2022. The Hispanic population makes up the majority of the City of Perris and remains close to 75% of the total population.

**Table 3. Race and Ethnicity**

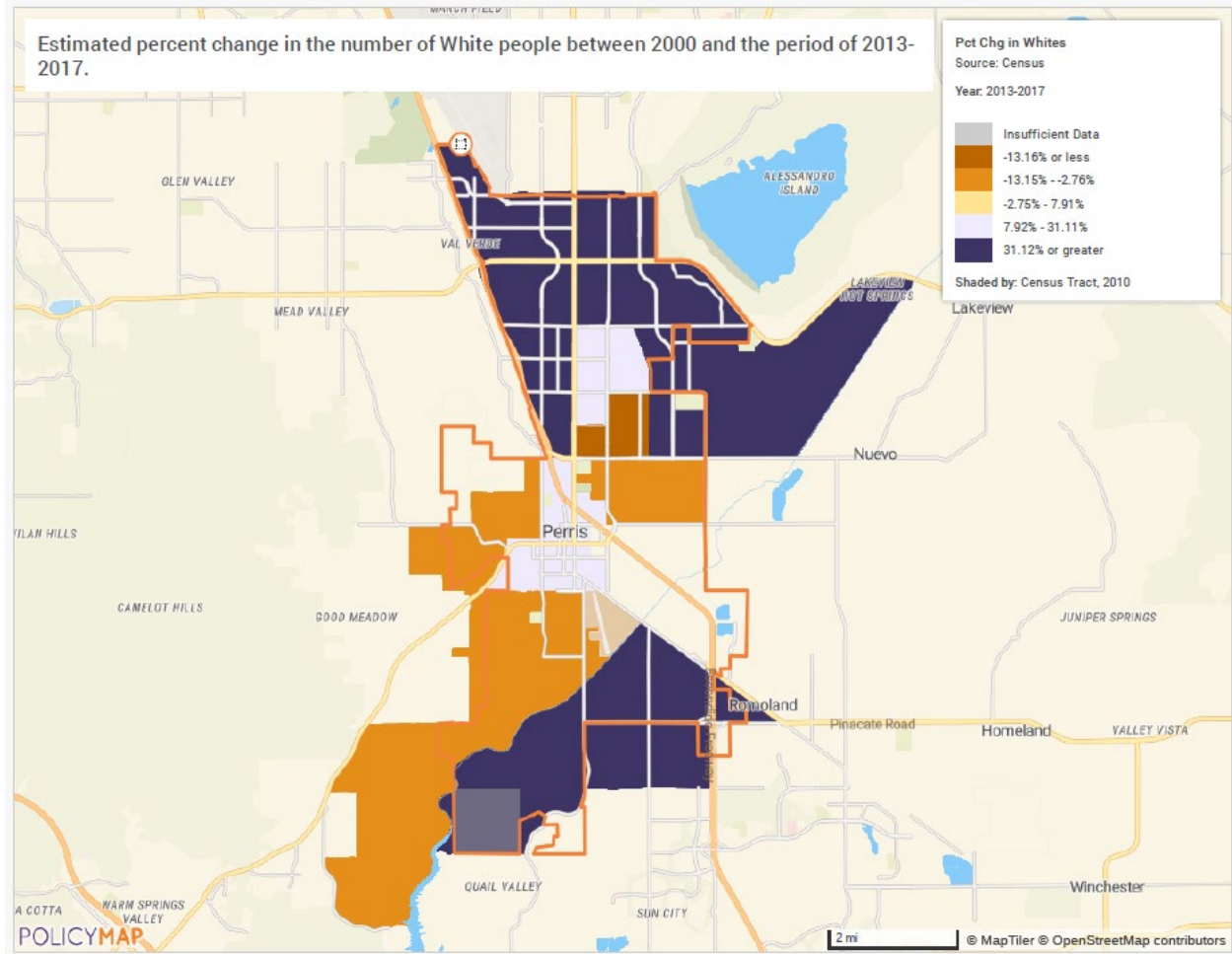
Race	2010		2015		2022	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
White	26,593	38.6%	22,487	30%	11,848	14.8%
Black or African American	5,280	7.7%	8,390	11.2%	10,866	13.5%
American Indian and Alaska Native	733	1.1%	406	0.5%	671	0.8%
Asian	1,817	2.6%	2,799	3.7%	1,345	1.7%
Native Hawaiian and Other Pacific Islander	0	0%	0	0%	1,364	1.7%
Other	32,523	47.3%	39,371	52.5%	40,858	50.9%
Two or More Races	2,655	3.9%	1,506	2%	13,306	16.6%
<b>TOTAL</b>	<b>68,816</b>	<b>100%</b>	<b>74,959</b>	<b>100%</b>	<b>80,258</b>	<b>100%</b>
Non-Hispanic	16,047	23.3%	20,561	27.4%	22,010	27.4%
Hispanic	52,769	76.7%	54,398	72.0%	58,248	72.6%

The maps below highlight what areas the White population lives in the City. Since 2000, the North and South areas of Perris have seen high increases in White residents, the central and western areas have seen high decreases.

# Estimated Percent of All People Who Were White, Between 201-2022

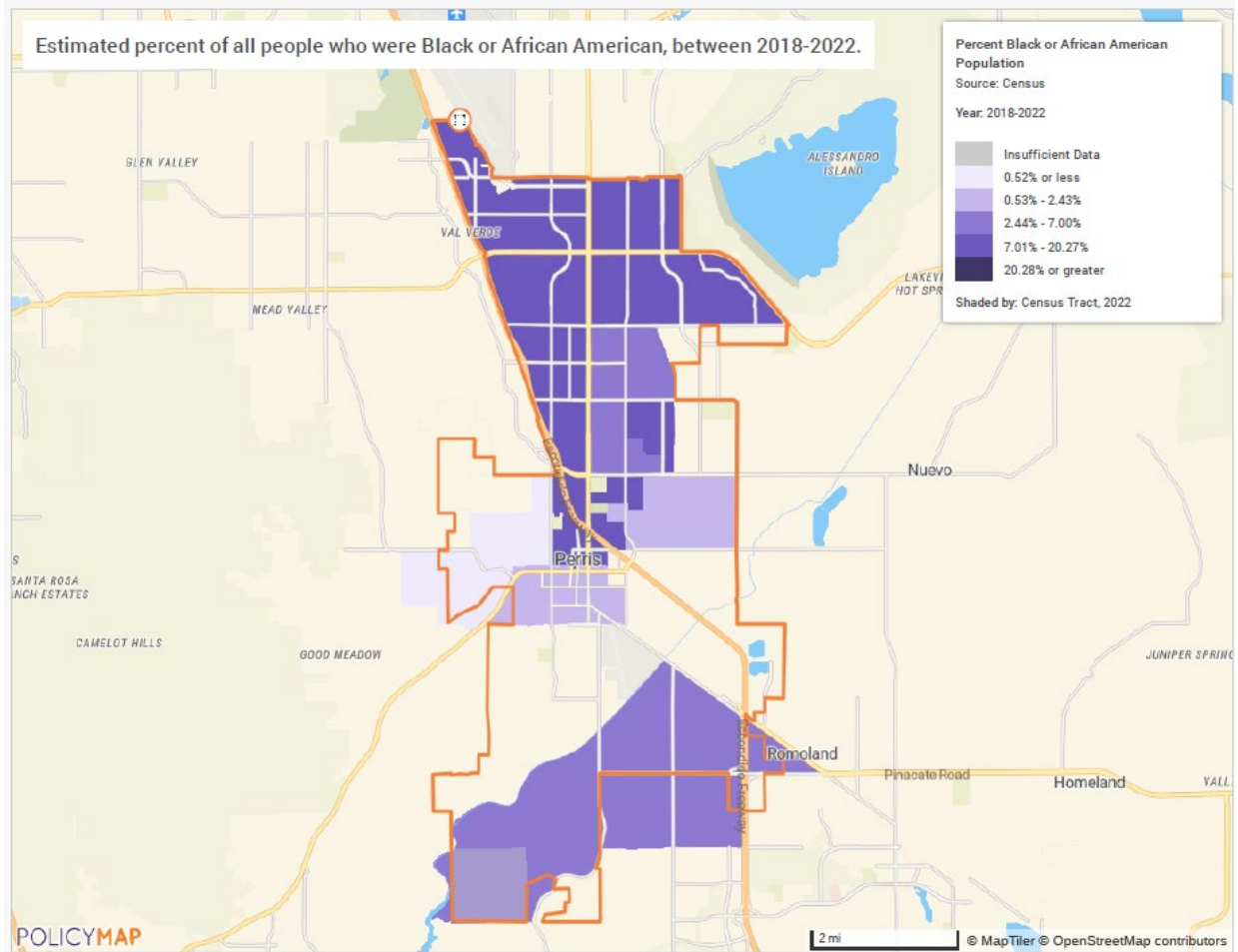


# Estimated Percent Change In the Number of White People between 2000 and the Period of 2013-2017

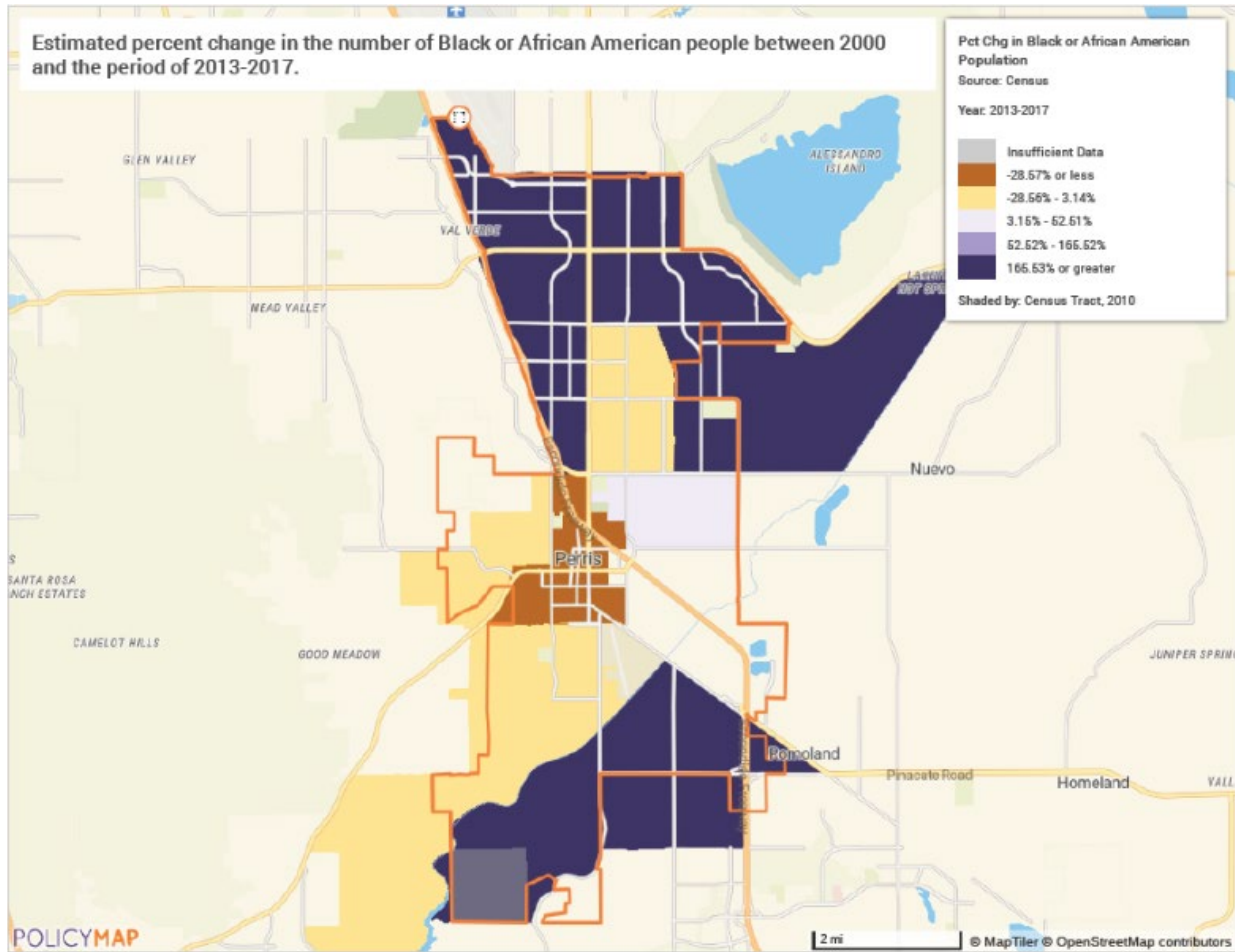


The Black population has grown mainly in the city's northern and southern regions. The percentage of Black residents has decreased significantly in the city's central region since 2000.

### Estimated Percent of All People Who Were Black or African American, Between 2018-2022



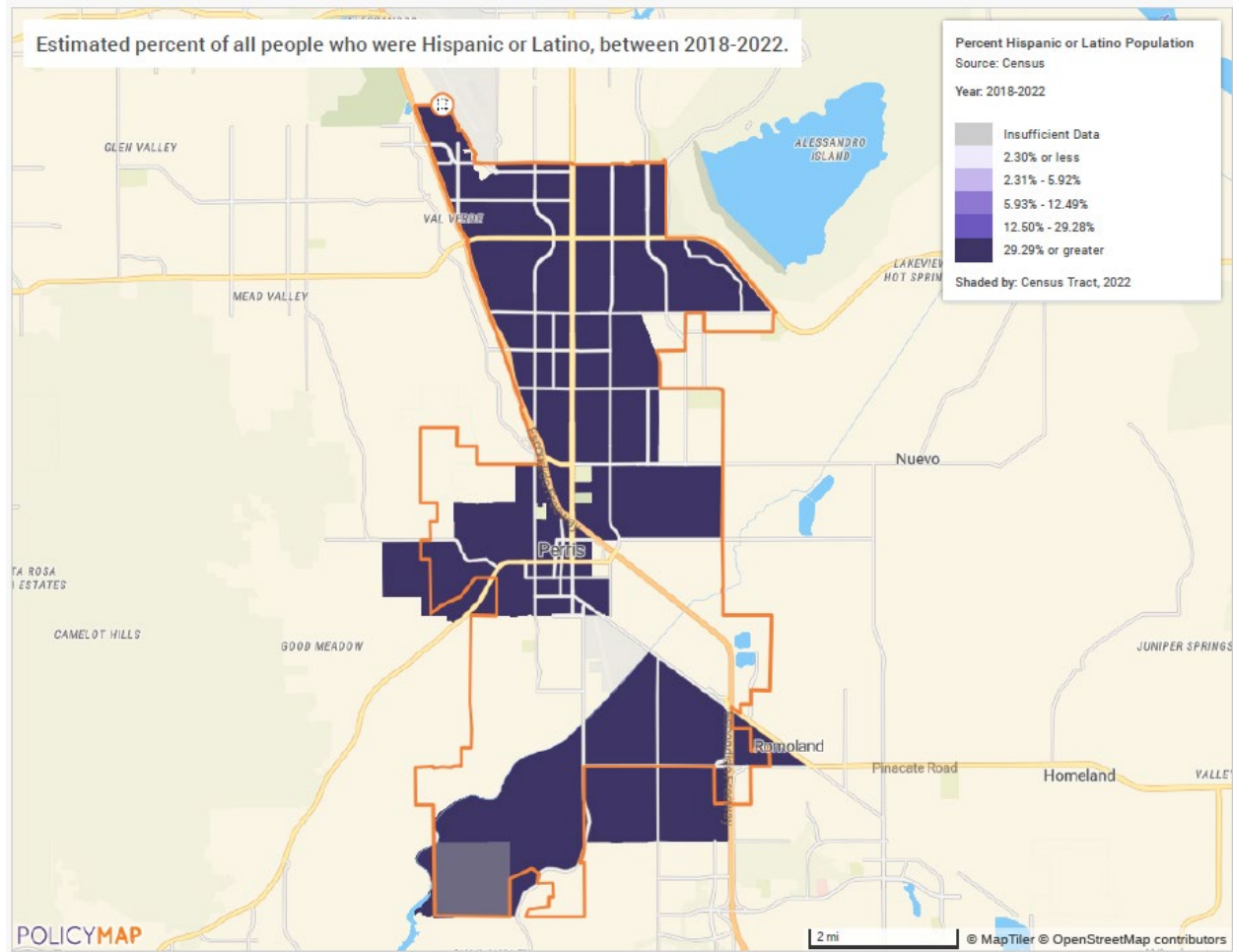
# Estimated Percent Change in the Number of Black or African America People Between 2000 and the Period 2013-2017





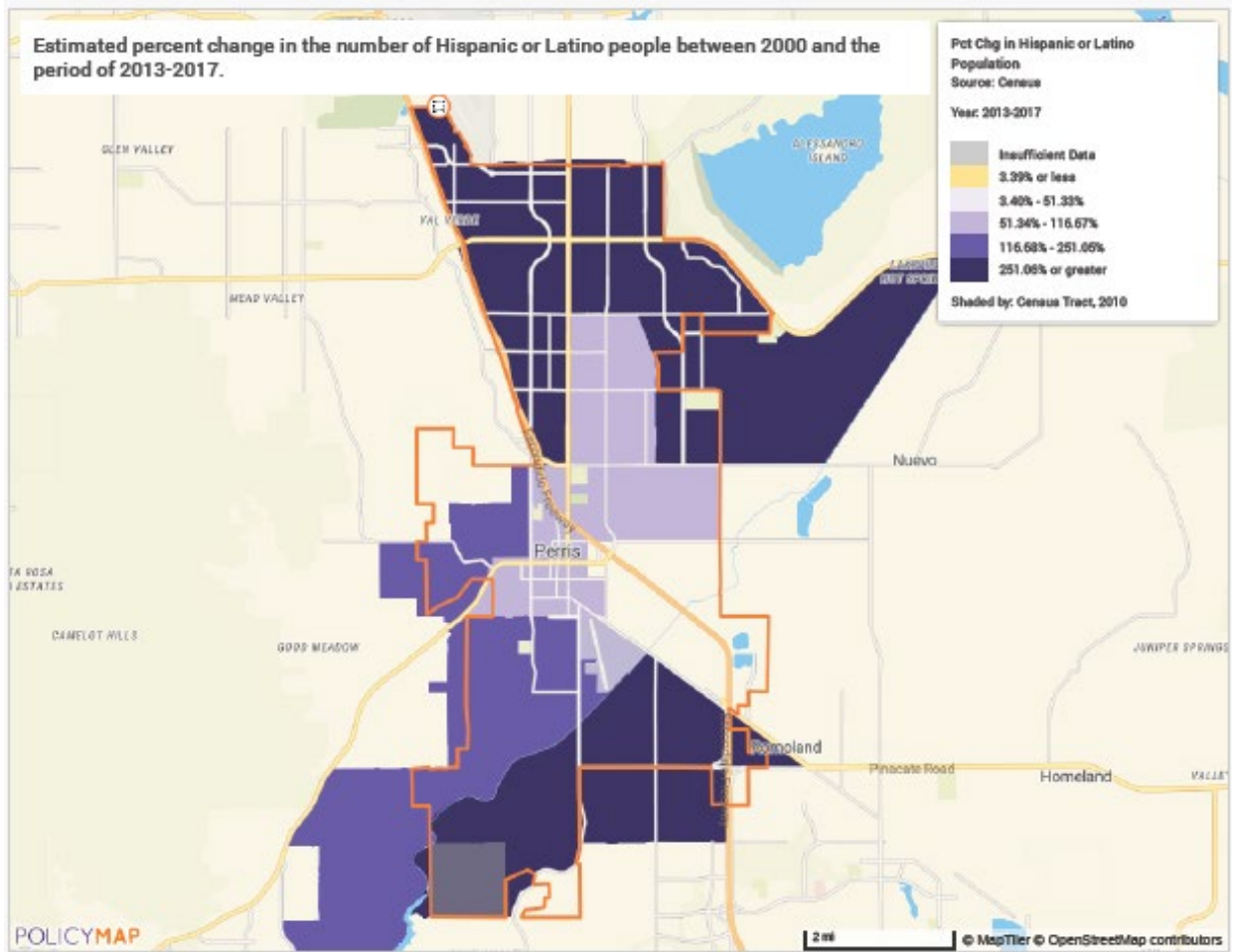
The Hispanic population has seen growth in most areas of the city over the past few decades. The highest concentrations of growth were in the northern and southern regions.

### Estimated Percent of all People who were Hispanic or Latino, Between 2018-2022





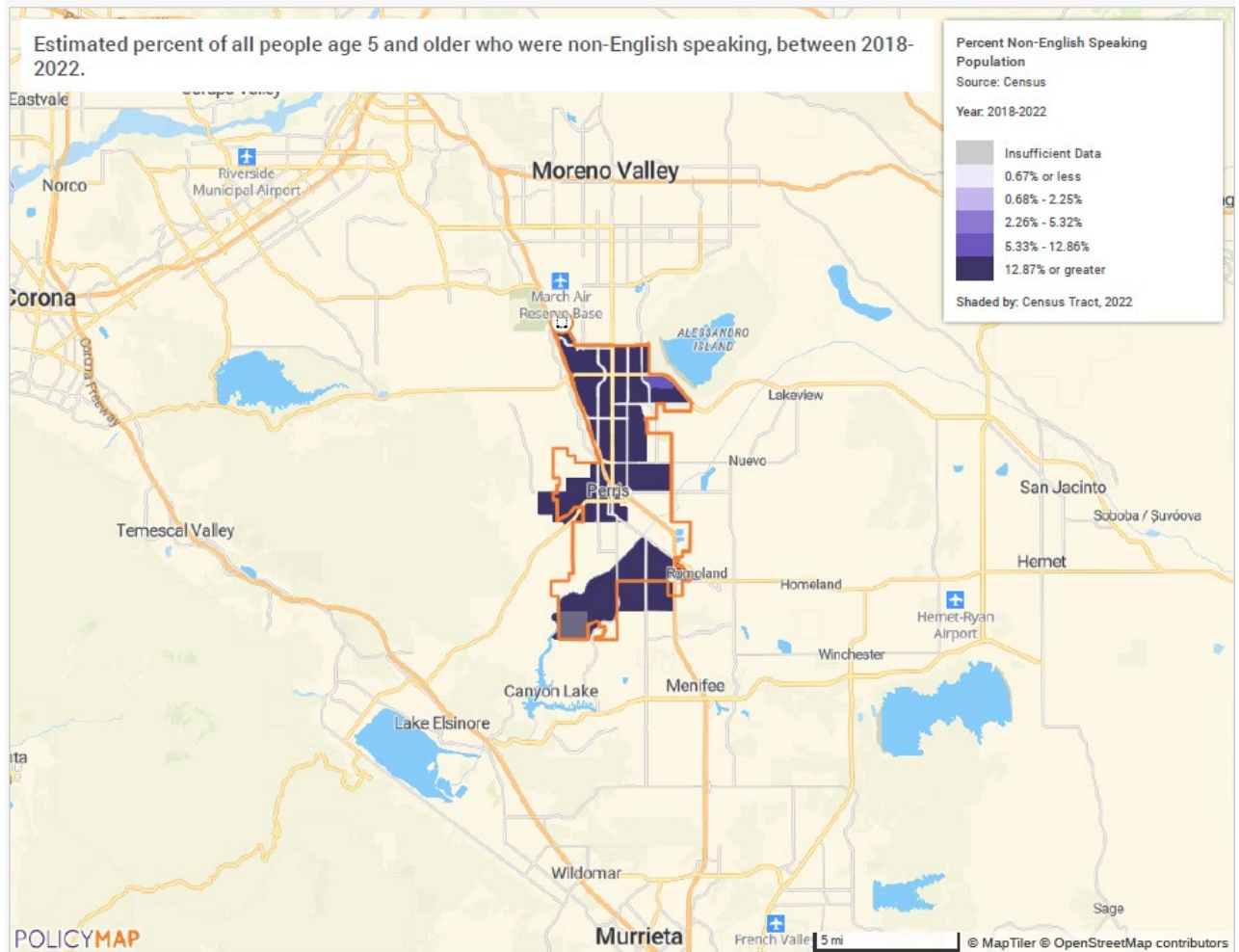
## Estimated Percent Change in the Number of Hispanic or Latino Between 2000 and the period of 2013-2017



### Linguistic Isolation

Census data shows that in 2020, 23.11% of the population of Perris were non-English speaking and 65.8% of people can speak a language other than English. The map below highlights the areas where those who are non-English speaking resided between 2018 and 2022. Reflective of the large Hispanic population in Perris, 62.6% of residents speak Spanish at home.

### Map. Estimated Percent of All People Age 5 and Older Who Were Non-English Speaking, Between 2018-2022



**Table 3. English Language Ability**

English Language Ability 2022 ACS								
Language Ability	Spanish		Other Indo-European Languages		Asian and Pacific Island Languages		Other Languages	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Speak English "very well"	29,932	65.5%	258	65.8%	817	48.4%	153	64.3%
Speak English less than "very well"	15,794	34.5%	134	34.2%	870	51.6%	85	35.7%
<b>Total</b>	45,726	100.0%	392	100.0%	1687	100.0%	238	100.0%

## 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.

### Household Composition and Size

The total number of households increased by about 23 percent between 2015 and 2022 in the City of Perris. While the number of family households has increased, it decreased in the total percentage of the household population. In contrast, the number of single person households has increased from about 10% in 2010 to 15% in 2022. Family households continue to be the predominant household type and are 85% of the household population in the city. Both the average household size and family size decreased between 2015 and 2022 but remains above 4 people per household on average. Communities with more families and larger households need larger housing unit options and community spaces available, as well as youth and family recreational spaces and programming. The chart below shows that family households with children comprise more than half of the households in Perris. This is higher than the number of households with children present in both Riverside County and the State of California overall, which both have less than half of total households including children.

**Table 4. Number of Households by Type, 2010 – 2022 Comparison**

Household Type	2010		2015		2022	
	Number	Percent	Number	Percent	Number	Percent
<b>Total Households</b>	15,621	100.0%	15,614	100.0%	19,243	100.0%
Families	14,028	89.9%	13,715	87.8%	16,343	85.0%
Singles	1,593	10.1%	1,899	12.2%	2,900	15.0%
Average Household Size	4.38		4.78		4.16	
Average Family Size	4.58		4.8		4.48	

**Table 5. Number of Households by Type, City, County, and State Comparison, 2018-2022**

2018-2022 Family Composition	Number of Families	Percent of Families
<b>City (Perris)</b>		
Families	16,438	--
Married with Children	6,721	40.89%
Single with Children	2,625	15.97%
Single Female with Children	1,905	11.59%
Other Families	7,092	43.14%
<b>County (Riverside)</b>		
Families	558,130	--
Married with Children	176,121	31.56%
Single with Children	67,089	12.02%
Single Female with Children	47,559	8.52%
Other Families	314,920	56.42%
<b>State (California)</b>		
Families	9,093,707	--
Married with Children	2,759,799	30.35%
Single with Children	1,116,027	12.27%
Single Female with Children	778,829	8.56%
Other Families	5,217,881	57.38%

Note: The category "Single with Children" includes all families that are "Single Female with Children", so all categories do not add up to 100 percent.

Source: [Census](#)  
 Data aggregated by:  
 2018-2022 Data Contains: 1 City

## C. Income Profile

Household income is the most important factor determining a household’s ability to balance housing costs with other basic life necessities. 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 defined fair housing issues, the relationships

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

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. The table below compares the HUD and State income categories.

**Table 6. Income Categories**

HUD Definition		State of California Definition	
<b>Extremely Low Income</b>	Less than 30% of AMI	<b>Acutely Low Income</b>	0-15% of AMI
<b>Low Income</b>	31-50% of AMI	<b>Extremely Low Income</b>	16-30% of AMI
<b>Moderate Income</b>	51-80% of AMI	<b>Very Low Income</b>	31-50% of AMI
<b>Middle/Upper Income</b>	Greater than 80% of AMI	<b>Low Income</b>	51-80% of AMI
		<b>Moderate Income</b>	81-120% of AMI
		<b>Above Moderate Income</b>	Greater than 120% of AMI

Source: Department of Housing and Urban Development and California Department of Housing and Community Development, 2024.

## 1. Median Household Income

According to ACS data, by 2018-2022 the City of Perris had seen an estimated 73% increase in household median income. This growth is about a 17% higher increase than Riverside County saw in median income change during the same time – but the County still had had more than a 50% increase.

**Table 7. Median Household Income**

Jurisdiction	Median Household Income		Percent Change
	2010	2018-2022 5-year ACS	
Perris	\$45,251	\$78,352	73.2%
Riverside County	\$54,296	\$84,505	55.6%

## 2. Income Distribution

The following table provides information on the number of households by income for the City, County and State between 2018-2022.

**Table 8. Incomes, City, County, and State, 2018-2022**

<b>Incomes:</b>		
The median household income for the study area was \$78,352, compared to the state of California with a median of \$91,905, as estimated for 2018-2022 by the Census' American Community Survey.		
The number of households divided by income categories is shown in the Annual Income Category table. In the period of 2018-2022, 25.34% of households in the study area had an annual income of less than \$50,000, compared to 27.87% of people in the state of California.		
<b>2018-2022 Annual Income Category</b>	<b>Number of Households</b>	<b>Percent of Households</b>
<b>City (Perris)</b>		
Less than \$25,000	1,888	10.13%
\$25,000 - \$34,999	1,490	7.99%
\$35,000 - \$49,999	1,345	7.22%
\$50,000 - \$74,999	3,871	20.77%
\$75,000 - \$99,999	3,556	19.08%
\$100,000 - \$124,999	1,895	10.17%
\$125,000 - \$149,999	1,536	8.24%
\$150,000 or more	3,059	16.41%
<b>County (Riverside)</b>		
Less than \$25,000	98,279	13.1%
\$25,000 - \$34,999	49,511	6.6%
\$35,000 - \$49,999	71,824	9.58%
\$50,000 - \$74,999	114,164	15.22%
\$75,000 - \$99,999	99,965	13.33%
\$100,000 - \$124,999	83,206	11.09%
\$125,000 - \$149,999	62,380	8.32%
\$150,000 or more	170,647	22.75%
<b>State (California)</b>		
Less than \$25,000	1,758,324	13.2%
\$25,000 - \$34,999	799,511	6%
\$35,000 - \$49,999	1,153,474	8.66%
\$50,000 - \$74,999	1,829,952	13.74%
\$75,000 - \$99,999	1,595,276	11.98%
\$100,000 - \$124,999	1,337,354	10.04%
\$125,000 - \$149,999	1,032,621	7.75%
\$150,000 or more	3,809,310	28.61%

According to the Census' American Community Survey estimates, the median income for a family in the period of 2018-2022 was \$78,527, compared to the state of California with a median family income of \$105,010.

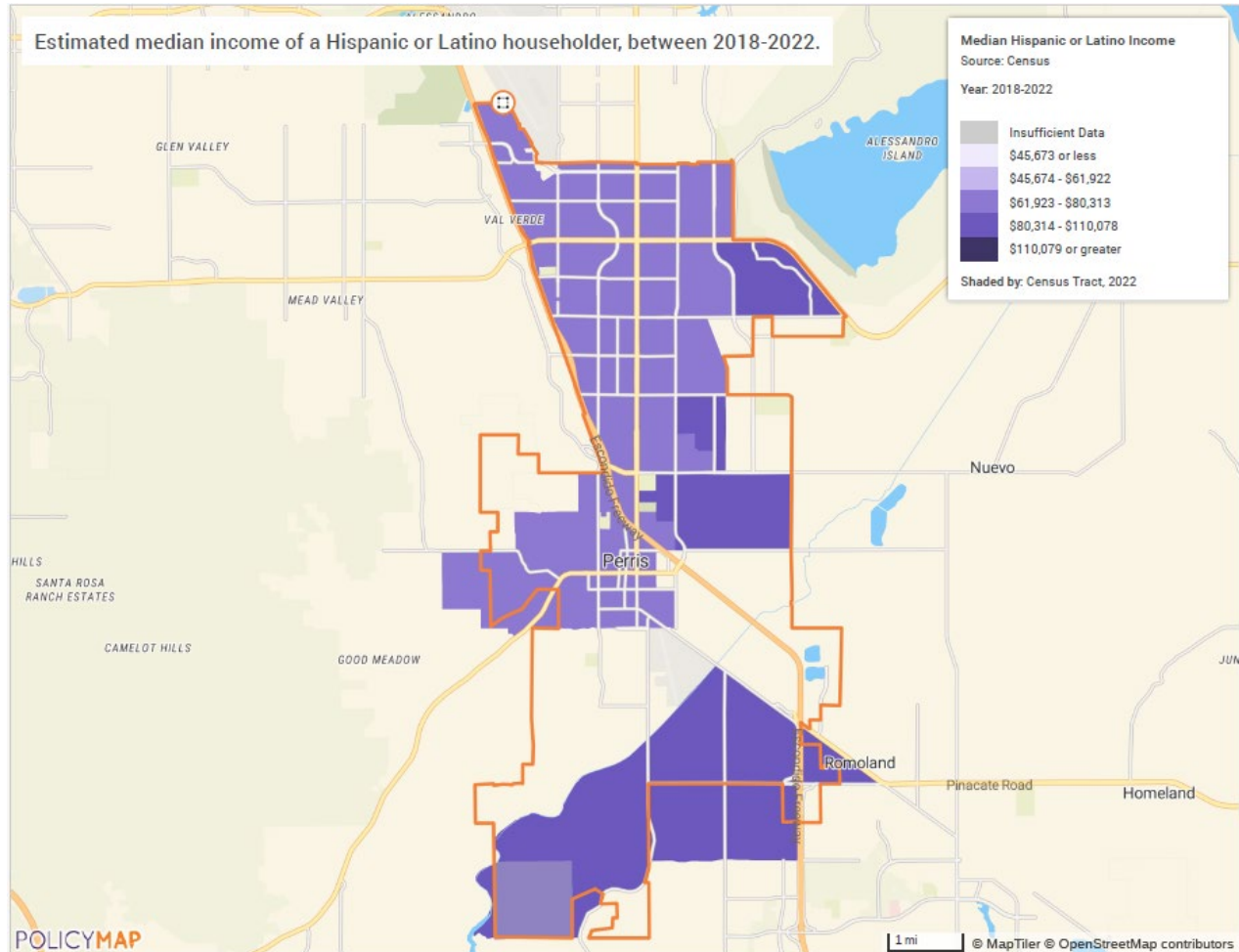
Source: [Census](#)  
 Data aggregated by:  
 2018-2022 Data Contains: 1 City



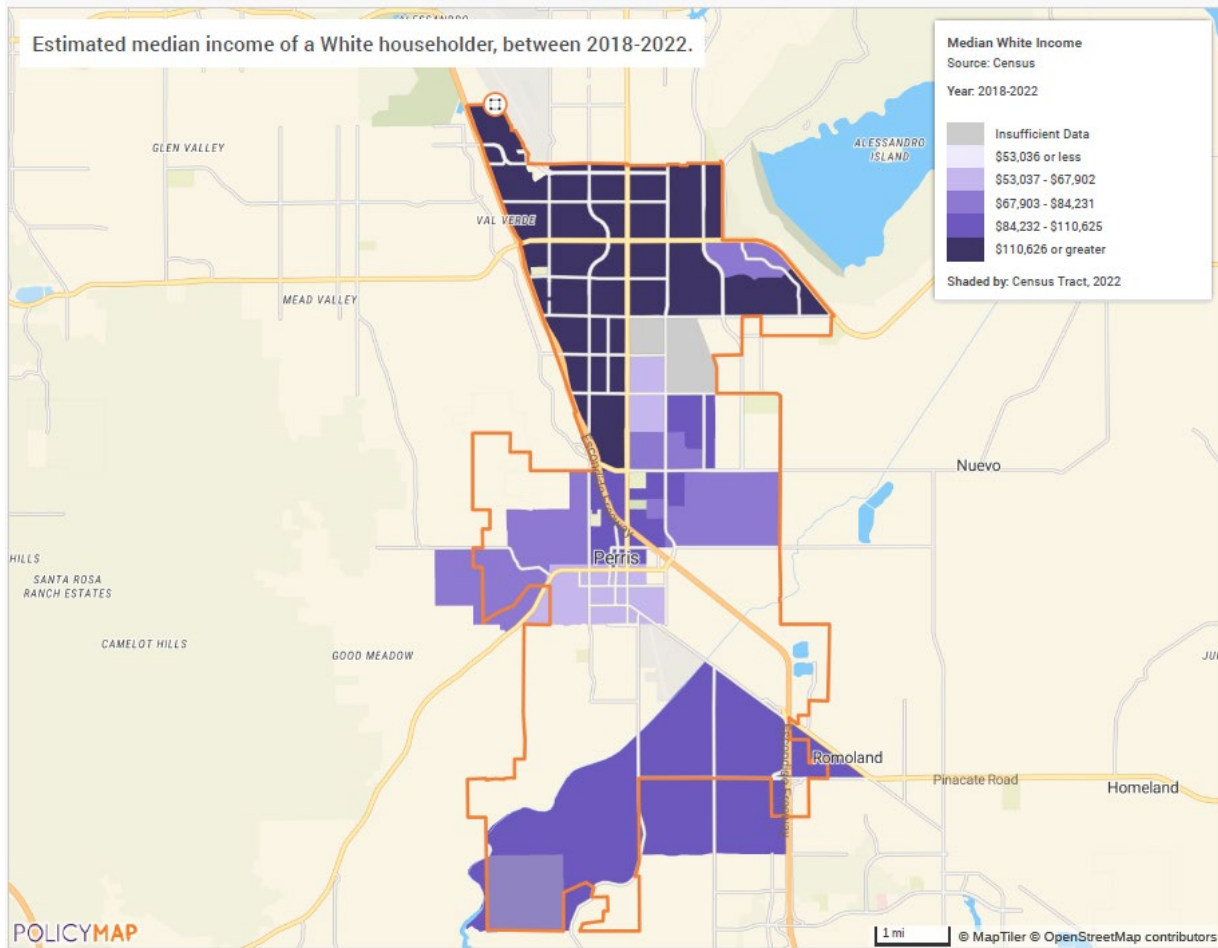
### 3. Income Distribution by Race/Ethnicity

The median household income of Hispanic or Latino households between 2018-2022 was \$78,172. The median household income of White households between 2018-2022 was \$83,387. The median household income of Black or African American households between 2018-2022 was \$70,096.

#### Estimated Median Income of a Hispanic or Latino Household Between 2018-2022



## Estimated Median Income of a White Household Between 2018-2022



## D. Special Needs Households

Certain households, because of their special characteristics and needs, may require special accommodation and may have difficulty finding housing due to these special needs. The special needs groups discussed in this section include seniors, persons with disabilities, persons with HIV/AIDS, families with children, single-parent households, large households, and homeless persons.

### 1. Seniors

Many conversations with stakeholders have included discussion around the increased pressure faced by seniors due to the prevalence of disabilities and fixed incomes being disproportionate to the housing market and increased cost of living. Seniors are also more likely to face housing discrimination and to have difficulty finding affordable housing options that provide necessary special accommodations. Although seniors are a fairly small percentage of the city's population, 39.31% of seniors aged 65 or older in Perris are living with a disability. The map below shows where seniors with disabilities primarily live within the city. There is a higher percentage of seniors living with one or more disabilities in the central area of the



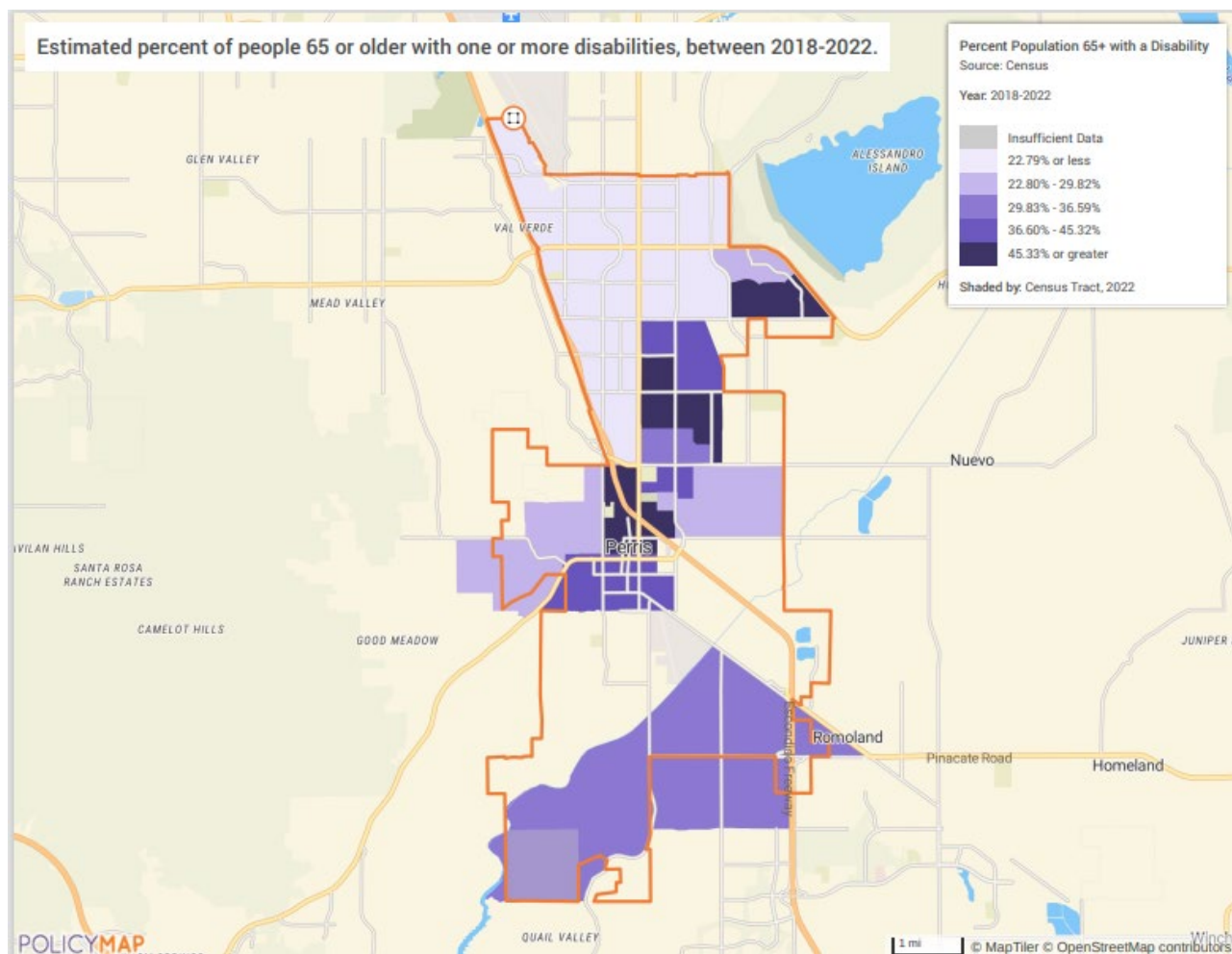
city, with the southern area also seeing higher rates. Many seniors who are living with ambulatory, self-care, or independent living difficulties need supportive services or caregivers in the home. Senior homeowners also have difficulty keeping up with necessary home repairs or modifications – both by physical limitations and the inability to afford repairs and services due to their limited fixed incomes. 36.49% of all senior homeowner households are cost burdened and 80.45% of all senior renter households are cost burdened.

**Table 9. Population with Disability**

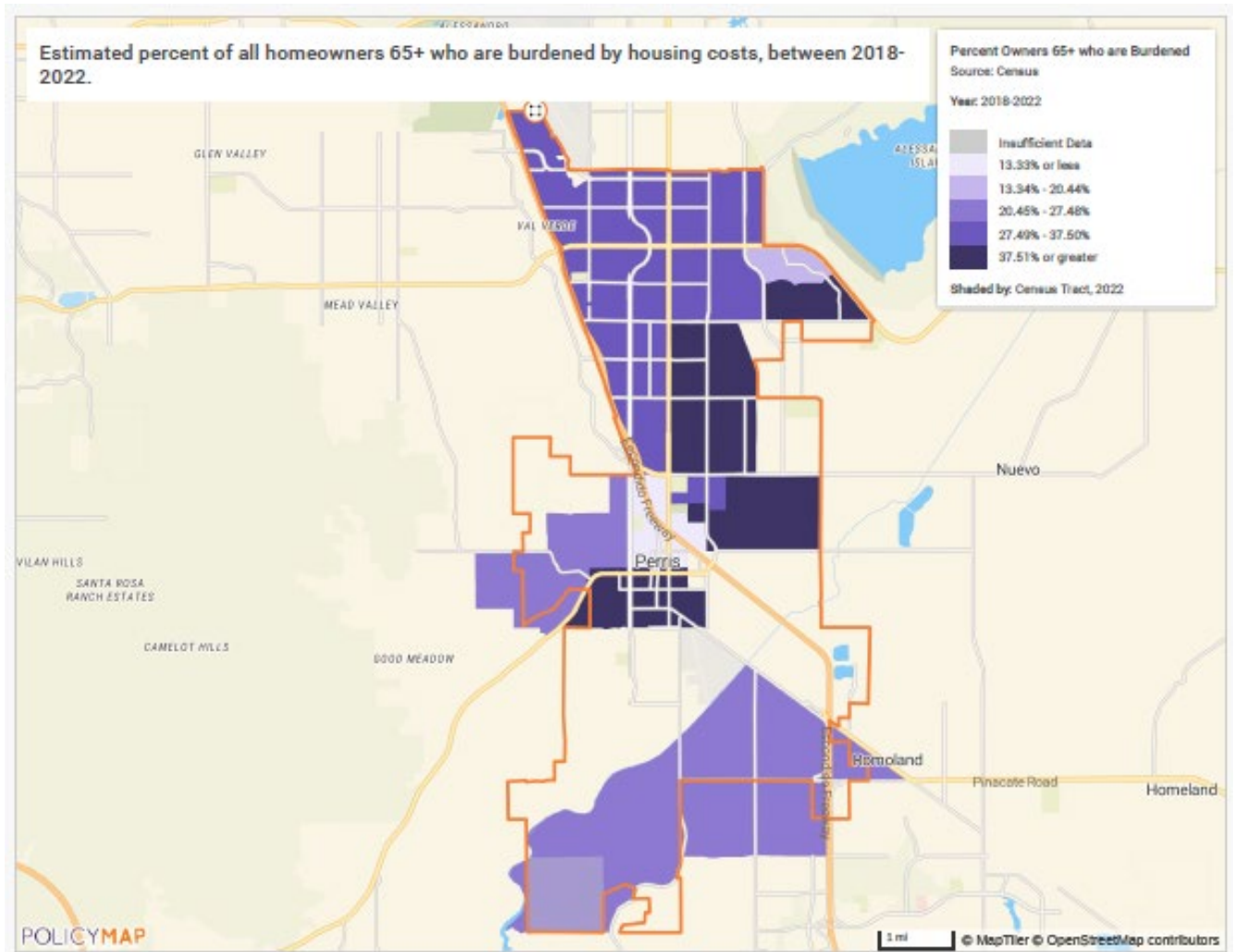
2018-2022 5 year ACS data  
Senior

Area	% of Population	With a Disability
Perris	7%	39.3%
Riverside County	14.80%	35.2%

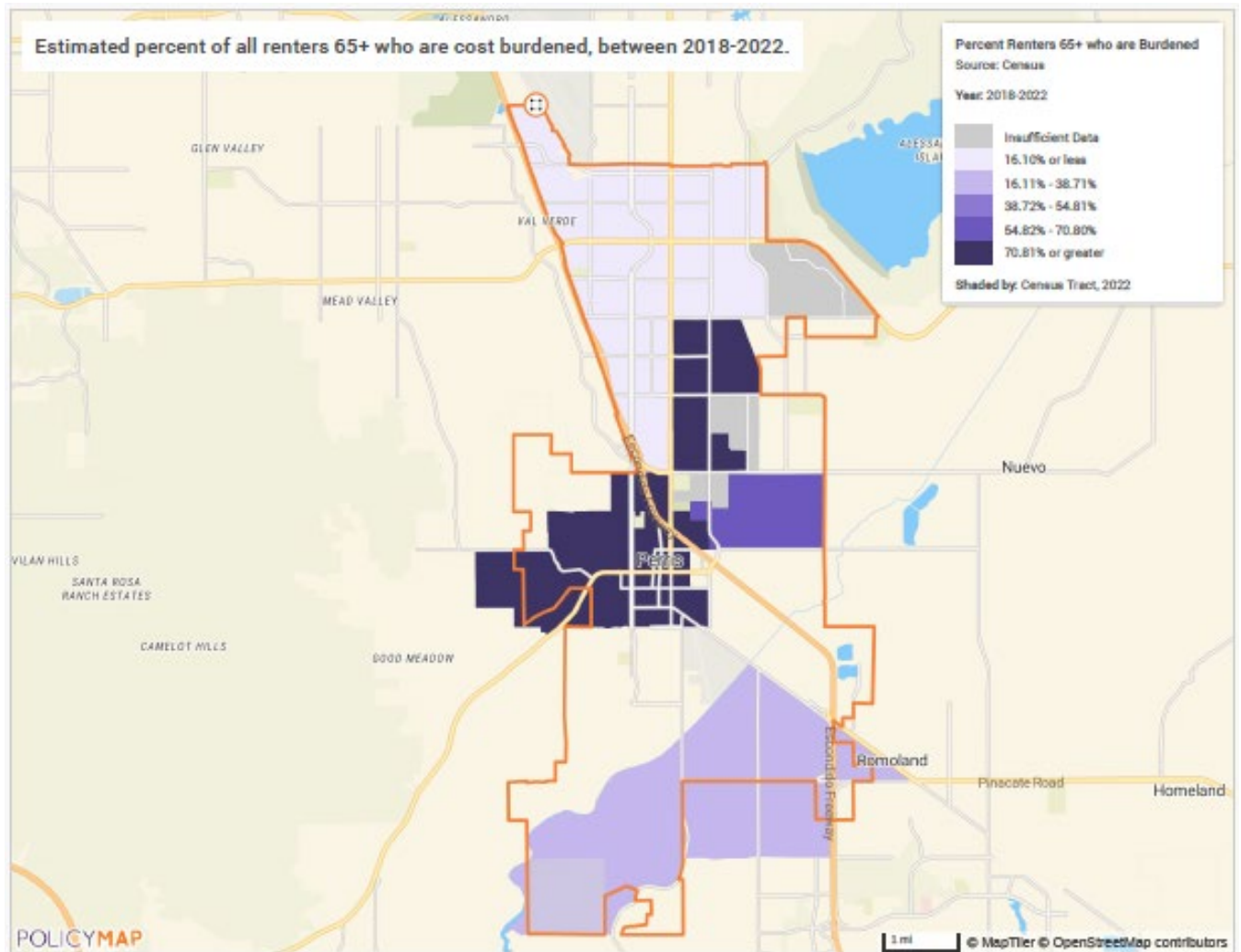
**Estimated Percent of People 65 or Older with One or More Disabilities, Between 2018-2022**



# Estimated Percent of All Homeowners 65+ Who are Burdened by Housing Costs, Between 2018-2022



## Estimated Percent of All Renters Who Are Cost Burdened, Between 2018-2022



### 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.

Riverside County's Network of Care for Seniors and People with Disabilities was created with a California Department of Aging innovation grant. The project is part of a broad effort by Riverside County to improve and better coordinate long-term care services locally. This comprehensive, Internet-based resource is for seniors and persons with disabilities, as well as their caregivers and service providers.

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

**Table 10. Senior Rental Housing**

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
<b>Total</b>		<b>310</b>	<b>308</b>	

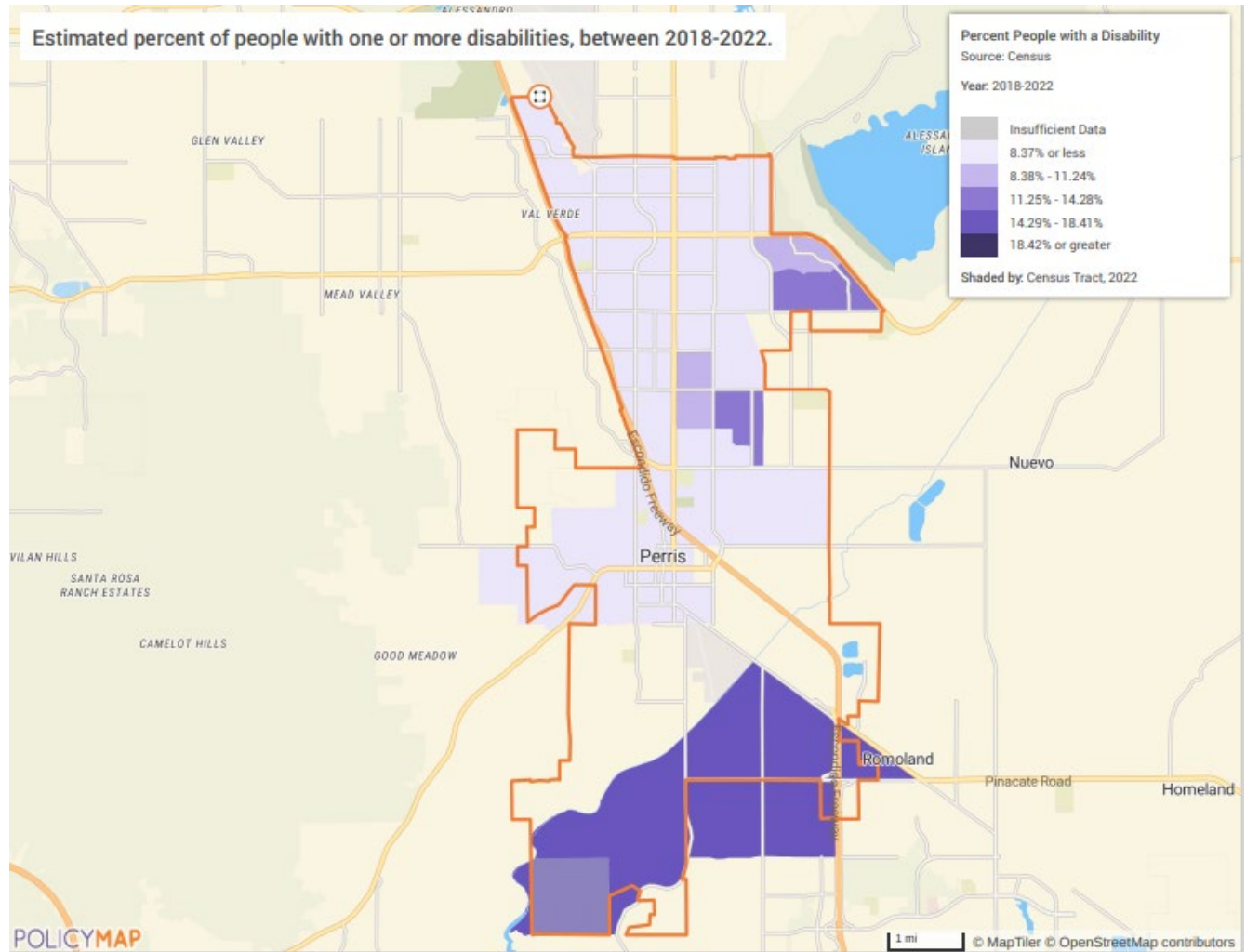
## 2. Persons with Disabilities

Nearly 9 percent (8.9%) of the population of the City of Perris is living with one or more disabilities. Ambulatory and cognitive disabilities are the most common forms of disabilities in Perris, with 3.8% and 4.4% respectively. As defined by the Census, ambulatory disabilities occur when an individual has serious difficulty walking or climbing stairs, while cognitive disabilities are when an individual has a physical, mental, or emotional problem, including difficulty remembering, concentrating, or making decisions. Individuals with disabilities generally face more difficulty finding access to affordable housing options that are close to reliable and accessible transportation, supportive services, medical services, community centers, and other helpful resources. This population may also be more likely to face housing discrimination based on the need for accessible units, home modifications, or service animals. The map below shows a larger density of people living with one or more disabilities living in the city's southern area.

**Table 11. Persons with Disabilities Profile (2018-2022)**

Area	% of Population	Hearing Disability	Vision Disability	Cognitive Disability	Ambulatory Disability	Self-Care Disability
Perris	8.9%	1.0%	1.2%	3.8%	4.4%	1.3%
Riverside County	1.6%	0.3%	0.3%	0.6%	0.3%	0.8%

## Estimated Percent of People With One or More Disabilities Between 2018-2022



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 22 adult residential care facilities located in Perris.

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. 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:

<https://aging.networkofcare.org/riverside>

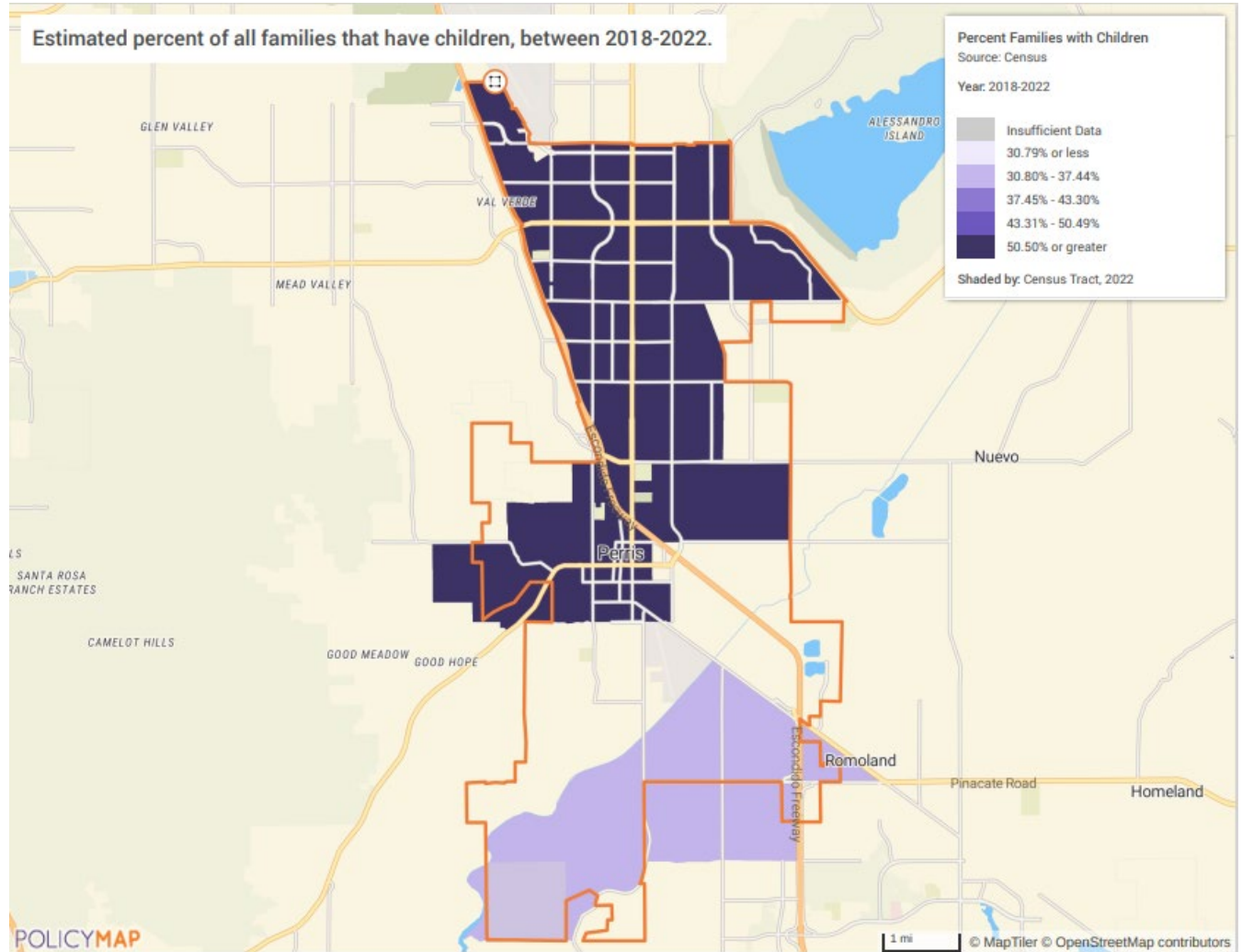
The Fair Housing Act, as amended in 1988, requires that cities and counties provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities. While fair housing laws intend that 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**

Over 56 percent (56.86%) of all family households in the city were households with children between 2018-2022 - 11.6% of these households were single female-headed households with children. A shortage of affordable housing options and rising rent prices contribute to financial stress, especially for low- and moderate-income families. The map below shows the prevalence of families with children in the city – the central and northern areas are densely populated. These areas also have high populations of Hispanic or Latino families and Black or African American families. Families with children may also face a higher level of housing discrimination due to landlords being fearful of noise or potential property damage.

## Estimated Percent of All Families That Have Children Between 2018-2022



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. Families with children can also benefit from support services offered by various organizations in neighboring communities.

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.

### 4. Single-Parent Households

About 9 percent (9.2%) of all households in the city between 2018-2022 were single-parent households with children. The map below shows the prevalence of single-parent households in Perris – the majority are in central Perris, with density also persisting in the northern area. Single-parent households need

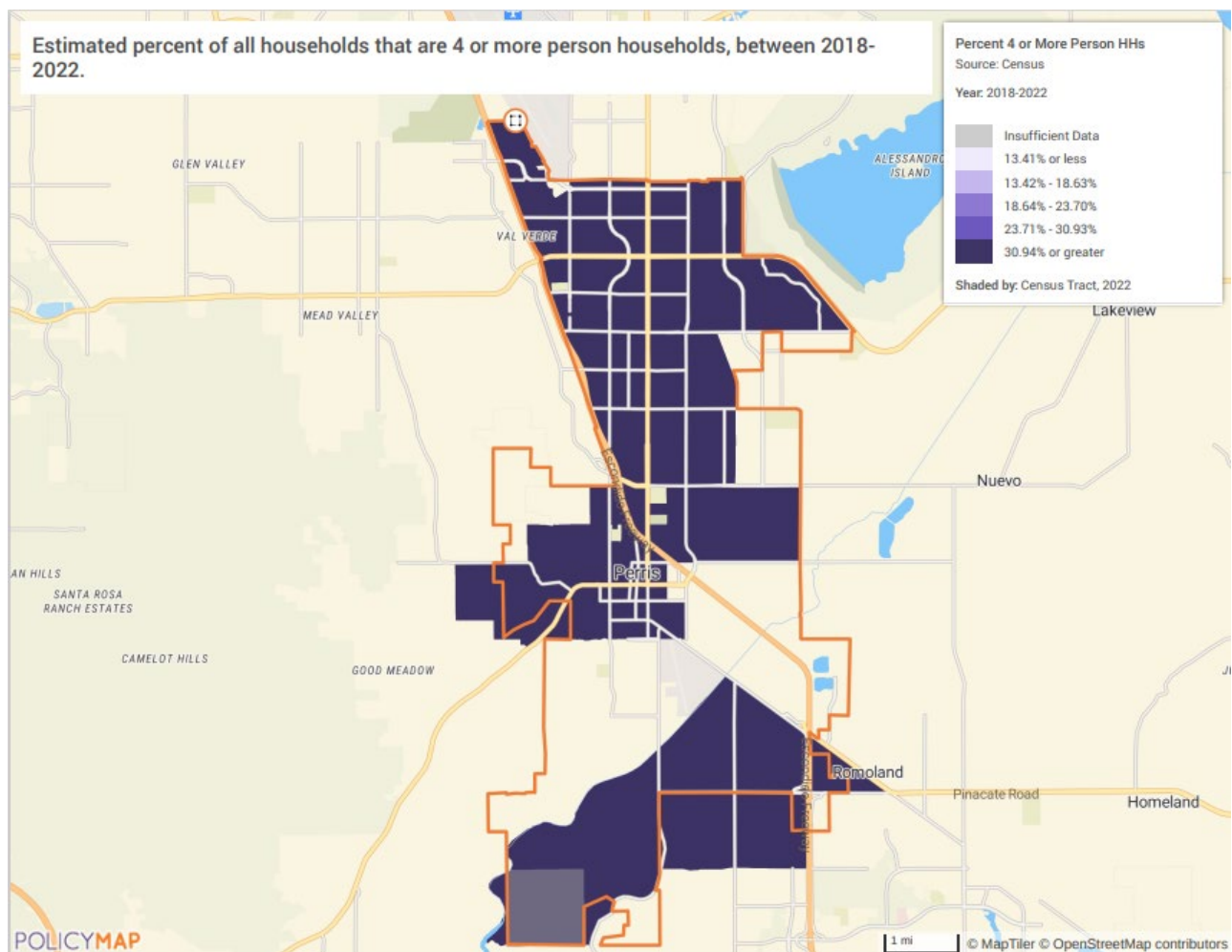
reliable transportation, access to affordable childcare options, local schools, recreational activities, and other services. Having one income limits the housing options available to single-parent households and they often cannot afford to live close to amenities.

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.

## 5. Large Households

Nearly 59% (58.96%) of all households in the city have 4 or more people living in it. About 9 percent (9.27%) of all households in the city have 7 or more people living in them. The map below shows that much of the city has a high density of large households. It is more difficult to find affordable housing options for large households, and often families may end up in situations where they are overcrowded. Larger families also face higher costs in food, clothing, medical care, and other daily expenses.

### Estimate Percent of All Households That are 4 or More Person Households Between 2018-2022





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.

The City of Perris participates in the Annual Riverside County Point in Time (PIT) Homeless Count and Survey, with the most recent report being released in June 2023. According to the Riverside County Homeless Point-in-Time Count and Survey Report, there were 90 unsheltered and 24 sheltered homeless persons in Perris at the time of the count. This represents about a 53% increase in unsheltered individuals from the 2022 PIT count and the highest number reported over the last four counts. Finding stable, safe, and affordable housing options for homeless persons transitioning into permanent housing can be very difficult. Fair Housing challenges are often present, with landlords being hesitant to rent to formerly homeless individuals out of fear they will not pay their rent, or from the stigma that all homeless persons face severe mental health challenges that will lead to payment or safety concerns. There is also a need for more shelters and supportive services to close the gap for those transitioning out of homelessness.

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**

According to the 2021 Epidemiology of HIV/AIDS in Riverside County Report by the County of Riverside Department of Public Health Epidemiology and Program Evaluation Branch, there were 2,234 people reported to be living with HIV/AIDS in Northwest Riverside County, which includes the City of Perris. Almost half of this population was Hispanic/LatinX. 74.8% of those living with HIV/AIDS in Northwest Riverside County are people of color – 43.8% higher than the rest of Riverside County.

Gender	Percent of new cases
Male	87.8%
Female	10.8%
Trans Male and Female	1.2%

Ethnicity	Percent of new cases
Hispanic/Latinx	54.2%
Black/African American	19.5%
White	21.0%
Asian	2.3%
All Other	3.0%



For those living with HIV/AIDS, access to affordable healthcare with locality to reliable transportation and medical care is crucial. In addition, persons with HIV/AIDS may also be targets of hate crimes. 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.

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

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.

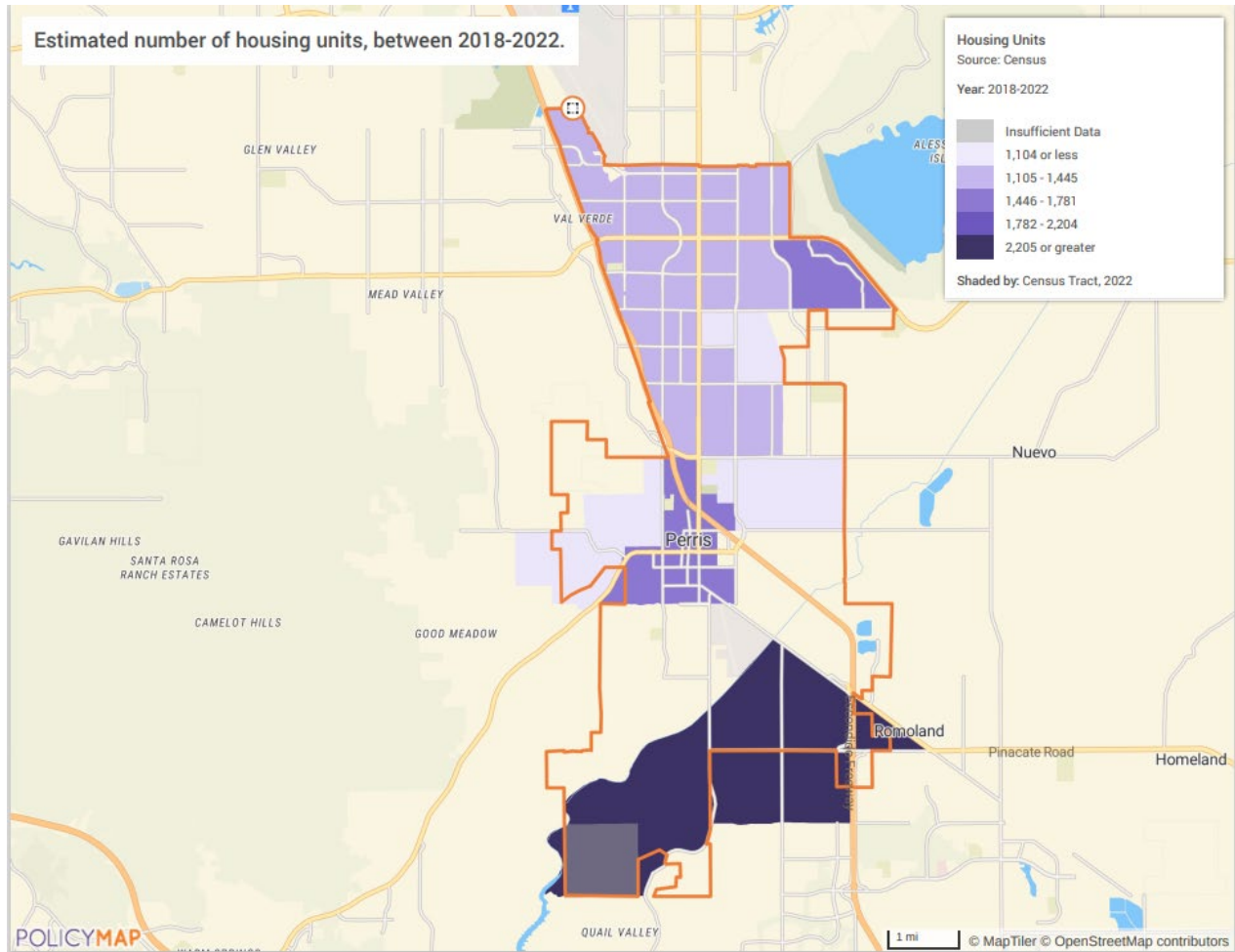
This section provides an overview of the city’s housing trends, including housing growth, housing type, housing tenure and vacancy, and housing condition.

### 1. Housing Growth

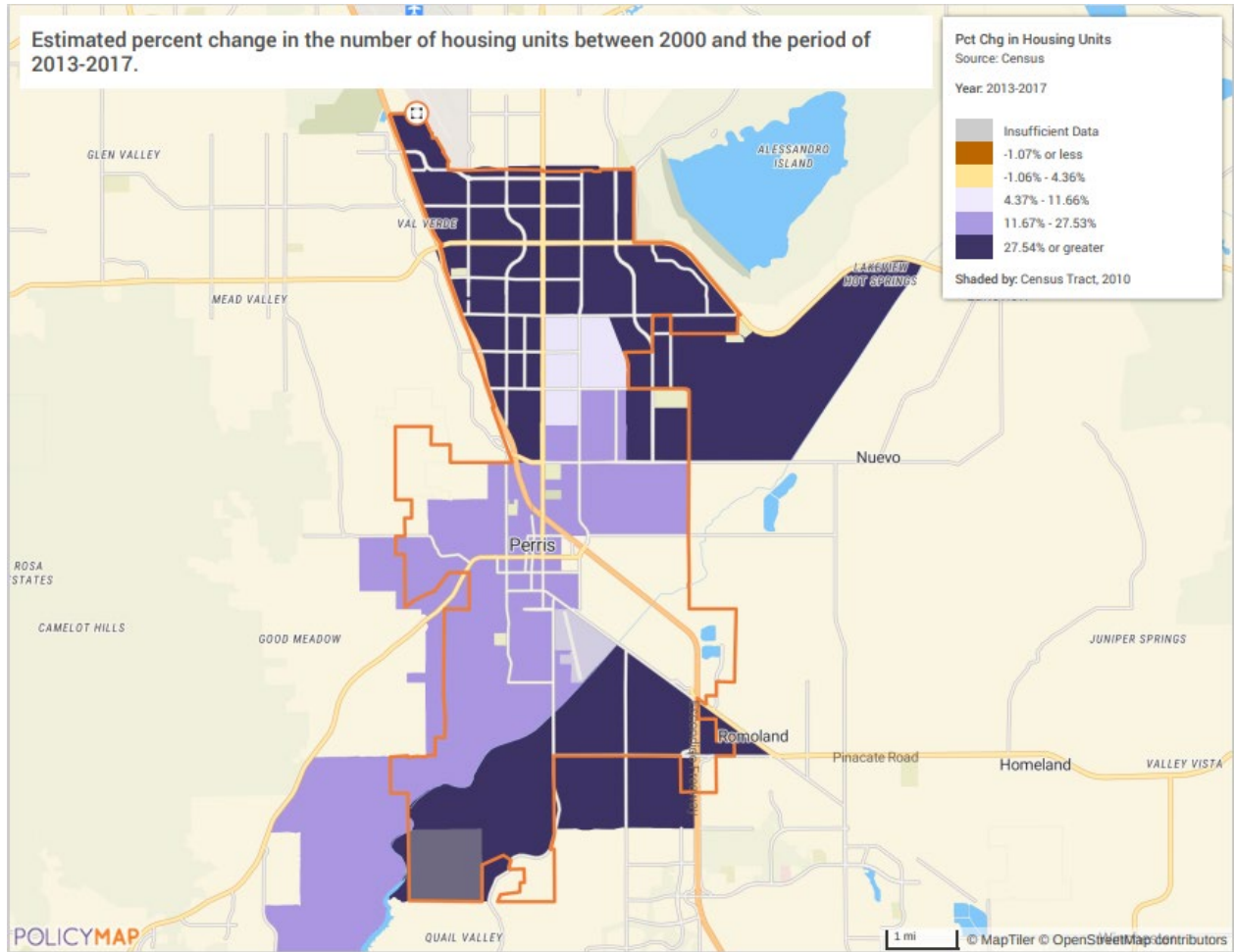
The 2018-2022 Census data illustrates that there were 19,521 housing units in the City of Perris – an 11.26% increase from 2015 and a 67.06% increase from 2000. 80.72% of the housing stock were single family homes. Although there has been massive growth, there is still a need for affordable housing options in the city. With an influx of workers moving to the area for warehousing jobs, a wider range of affordable units is in demand. Construction of new housing units is impacted by rising construction costs, regulation and

zoning standards, lack of interest from developers, and lack of funding. 2018-2022 data suggests that there were 19,521 housing units present in the city. The first map shows the location of these housing units – there is a much higher density in the city's southern area. Although the northern area has seen tremendous growth in housing units since 2000 (see map below), there is still a need for additional housing options in that region because a large majority of low-income families and special populations (ie. Seniors, non-English speaking individuals) live in those areas.

### Estimated Number of Housing Units Between 2018-2022



## Estimated Percent Change in the Number of Housing Units Between 2000 and the Period of 2013-2017



## 2. Housing Type

According to ACS data, in 2022, single-family units accounted for almost 81 percent of the total housing stock in Perris. Although single-family units are still the majority of housing unit type, they saw a decrease by about 3 percent since 2015. Alternatively, both multi-family units and mobile homes, trailers, and other units saw an increase throughout the city. Multi-family 2-4 units saw an increase of 2.8% from 2015 to 2022, and mobile homes, trailers, and other types of units saw an increase of 2.7%. Overall, multi-family units only saw a small increase of under 1 percent – this growth does not meet the demand of the number of families that live in Perris. A wider range of housing types would allow the city to accommodate residents with varying levels of need and preferences.

**Table 12. Number and Percent of Units By Housing Type, 2015 to 2022 Comparison**

Occupied Housing Type	2015		2022		Percent Change in Units
	Number of Units	Percent of Total	Number of Units	Percent of Total	
Single-Family Detached	12,710	81.4%	14,956	77.7%	-3.7%
Single-Family Attached	422	2.7%	577	3.0%	0.3%
<b>Total Single-Family</b>	13,131	84.1%	15,533	80.7%	-3.4%
Multi-Family 2-4 Units	219	1.4%	806	4.2%	2.8%
Multi-Family 5+ Units	1,218	7.8%	1,081	5.6%	-2.2%
<b>Total Multi-Family</b>	1,237	9.2%	1,887	9.8%	0.6%
Mobile Homes, Trailer & Other	1,062	6.8%	1,823	9.5%	2.7%
<b>Total</b>	<b>15,614</b>	<b>100%</b>	<b>19,243</b>	<b>100.0%</b>	<b>23.24%</b>

**Table 13. Housing Type, 2018-2022**

<b>Housing Type City of Perris 2018-2022 Census Data</b>		
<b>2018-2022 Housing Stock</b>	<b>Number of Units</b>	<b>Percent of Units</b>
<b>City (Perris)</b>		
Single family detached homes	15,369	78.73%
Single family attached homes	388	1.99%
2-unit homes and duplexes	136	0.70%
Units in small apartment buildings	1,797	9.21%
Units in large apartment buildings	669	3.43%
Mobile homes or manufactured housing	1,130	5.79%
Other types	32	0.16%
<b>County (Riverside)</b>		
Single family detached homes	585,506	68.75%
Single family attached homes	46,851	5.50%
2-unit homes and duplexes	10,919	1.28%
Units in small apartment buildings	105,324	12.37%
Units in large apartment buildings	28,086	3.30%
Mobile homes or manufactured housing	73,733	8.66%
Other types	1,227	0.14%
<b>State (California)</b>		
Single family detached homes	8,267,689	57.32%
Single family attached homes	1,042,730	7.23%
2-unit homes and duplexes	343,642	2.38%
Units in small apartment buildings	3,064,826	21.25%
Units in large apartment buildings	1,171,438	8.12%
Mobile homes or manufactured housing	516,631	3.58%
Other types	17,486	0.12%

### 3. Housing Tenure and Vacancy

Owner-occupied units saw an almost 9 percent increase between 2015 and 2022 and accounted for about 68 percent of the total occupied housing units. Renter-occupied units saw a decrease in percentage and dropped from a little over 40 percent of occupied units in 2015 to about 32 percent of occupied units in 2022. Renters are more likely to face fair housing challenges and be cost-burdened. Census data suggests that between 2018 and 2022, over 88 percent of renters under the age of 65 in Perris were cost-burdened – this is higher than the percentage of cost-burdened renters in both Riverside County and the State of California overall.

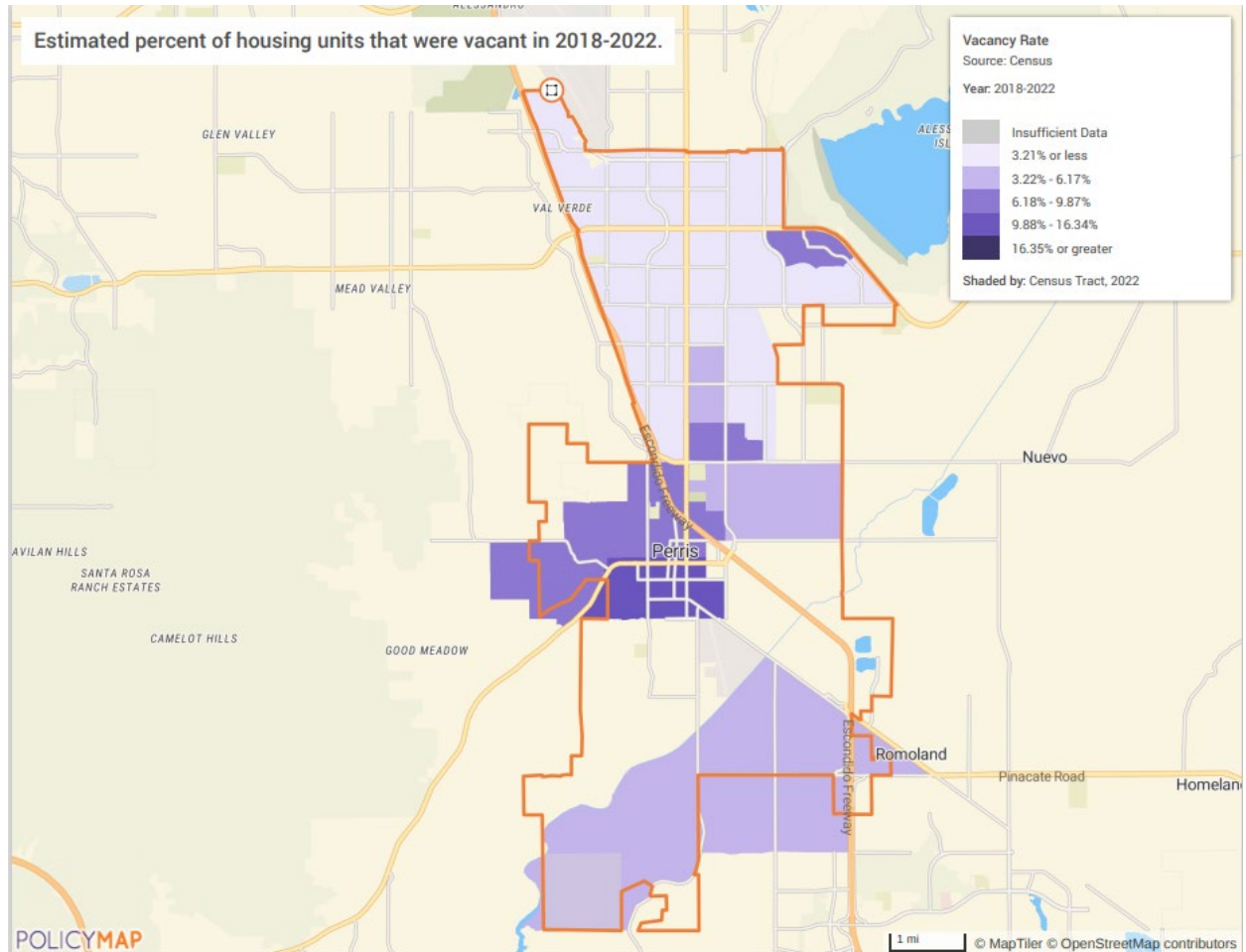
The rental vacancy rate has decreased over the past decade and was at 4.5 percent in 2022 – decreasing

from 10 percent in 2010 and 6 percent in 2015. Comparatively, the owner vacancy rate has increased from 0 percent in 2015 to 3.5 percent in 2022. The high cost of homeownership in the area may have influenced the increase in homeowner vacancies, with homeowners not being able to keep up with the costs of owning and maintaining a home. The map below shows where vacant housing units were located within the city, with the central region reflecting the highest density.

**Table 14. Owner and Renter Vacancy by Number and Percent, 2010, 2015 and 2020 Comparison**

Vacancy	2010		2015		2022	
	Number	Percent of Total	Number	Percent of Total	Number	Percent of Total
Total Occupied	15,621	100%	15,614	100%	19,243	100.0%
Owner Occupied	10,281	65.8%	9,308	59.6%	13,129	68.2%
Renter Occupied	5,340	34.2%	6,306	40.4%	6,114	31.8%
<b>Vacancy Rates</b>						
Rental Vacancy	10%		6%		4.5%	
Owner Vacancy	7.3%		0%		3.5%	
Overall Vacancy	2.8%		6%		5.5%	

# Estimated Percent of Housing Units That Were Vacant in 2018-2022





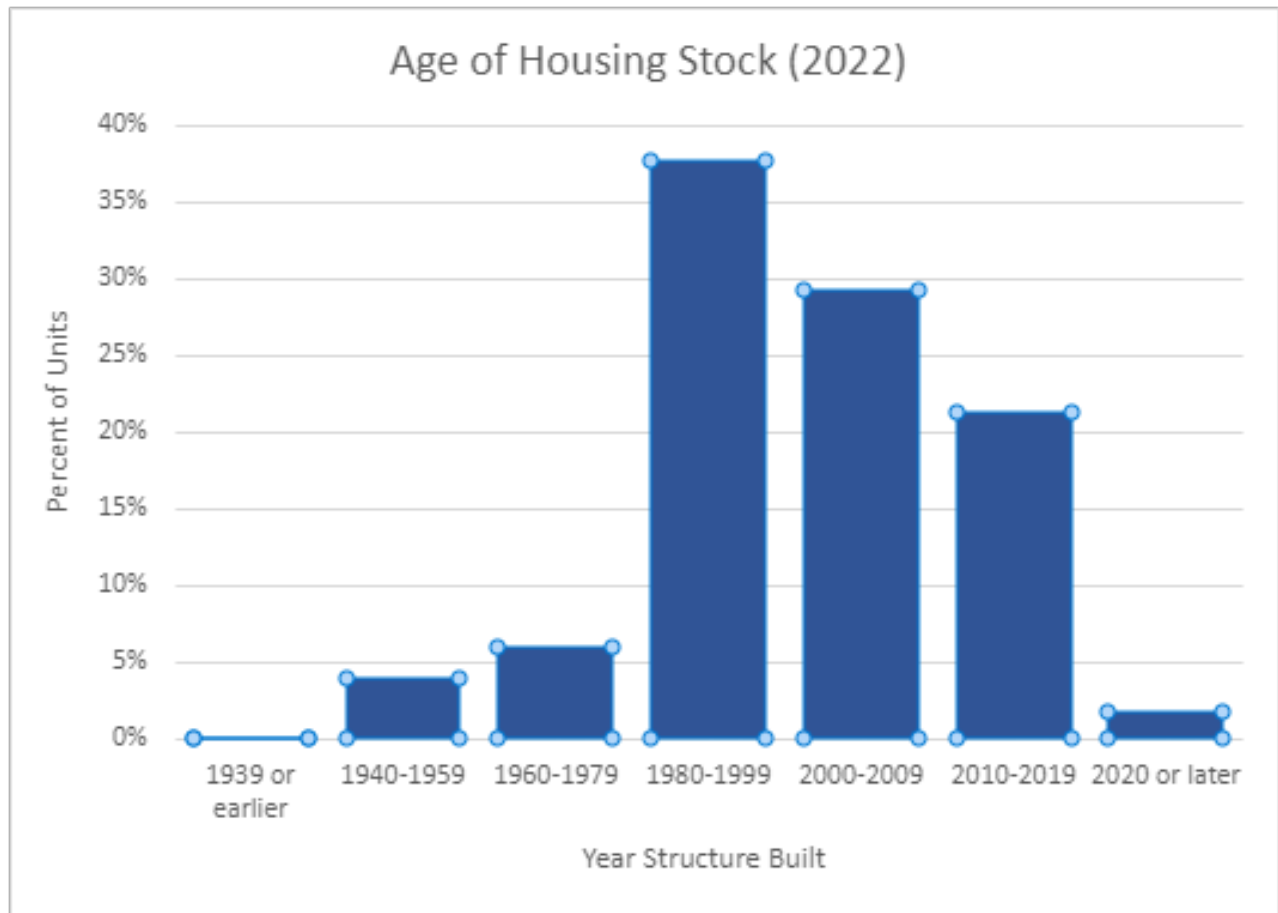
**Table 15. Vacancies Based on Postal Data, County, and State 2022 -2023**

Postal Vacancies City of Perris 2022-2023						
Postal Address Vacancy	2022Q2	2022Q3	2022Q4	2023Q1	2023Q2	2023Q3
<b>City (Perris)</b>						
Number Vacant - Residential	74	72	74	74	72	72
Percent Vacant - Residential	0.38%	0.37%	0.38%	0.38%	0.37%	0.37%
Number Vacant - Business	65	65	65	65	64	65
Percent Vacant - Business	6.31%	6.32%	6.20%	6.19%	6.08%	6.16%
Overall Vacancy Rate	0.68%	0.67%	0.67%	0.67%	0.66%	0.66%
<b>County (Riverside)</b>						
Number Vacant - Residential	15,924	16,226	16,401	16,539	16,843	17,206
Percent Vacant - Residential	1.86%	1.89%	1.90%	1.91%	1.93%	1.97%
Number Vacant - Business	6,493	6,428	6,326	6,287	6,324	6,327
Percent Vacant - Business	10.16%	10.05%	9.88%	9.81%	9.85%	9.84%
Overall Vacancy Rate	2.44%	2.46%	2.45%	2.46%	2.47%	2.51%
<b>State (California)</b>						
Number Vacant - Residential	136,849	136,933	140,225	141,183	142,344	144,266
Percent Vacant - Residential	0.96%	0.96%	0.98%	0.98%	0.99%	1%
Number Vacant - Business	99,025	99,543	99,345	100,478	101,213	102,252
Percent Vacant - Business	6.62%	6.66%	6.65%	6.72%	6.78%	6.84%
Overall Vacancy Rate	1.50%	1.50%	1.51%	1.53%	1.53%	1.55%

#### 4. Housing Condition

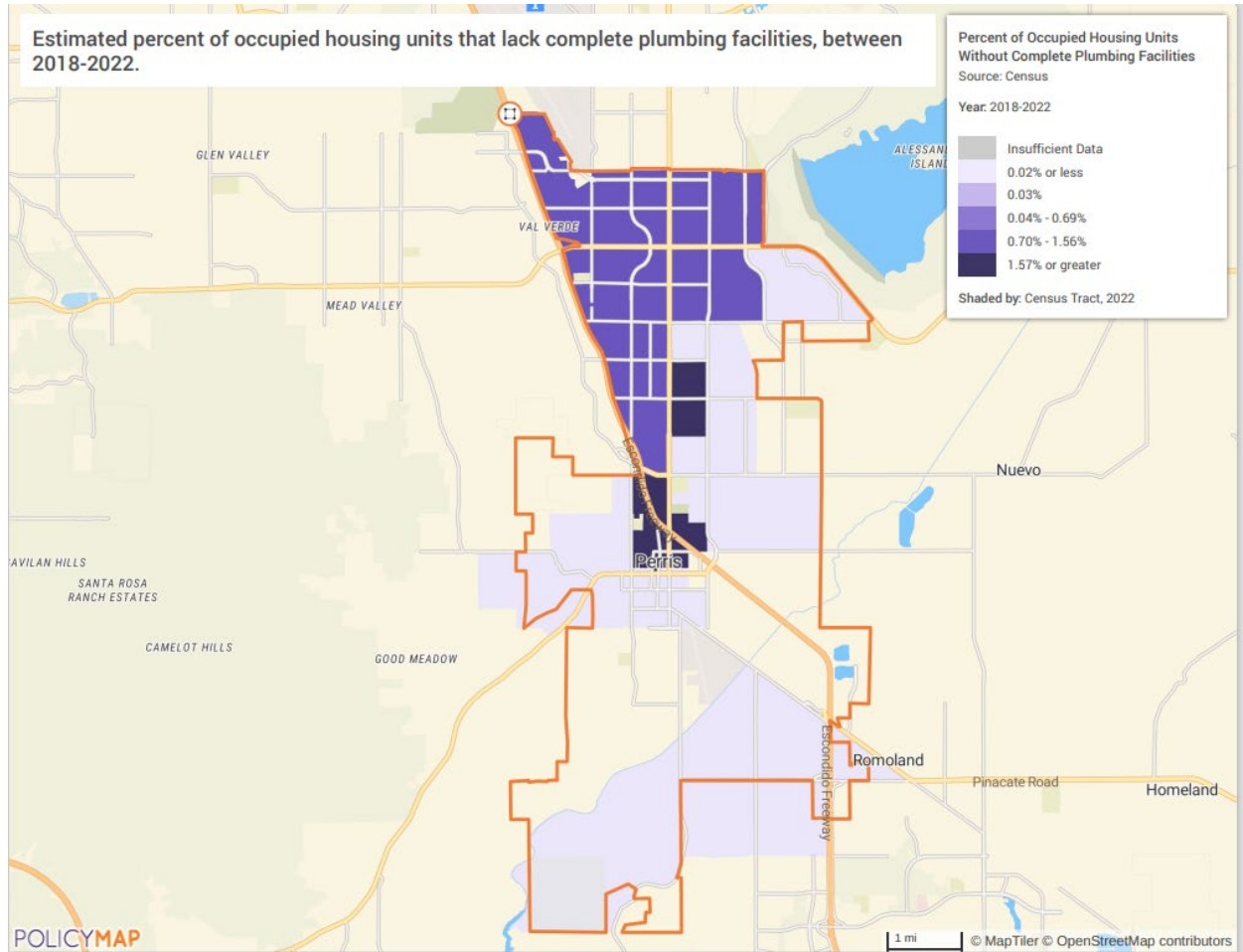
Most of the city’s housing stock was built after 1980, with less than 10 percent of units being built prior to 1980. Although the housing stock in the city is newer, the cost of maintenance and repairs has continued to increase, and it is difficult for homeowners to keep up with – especially elderly and lower income homeowners.

## Age of Housing Stock, 2022

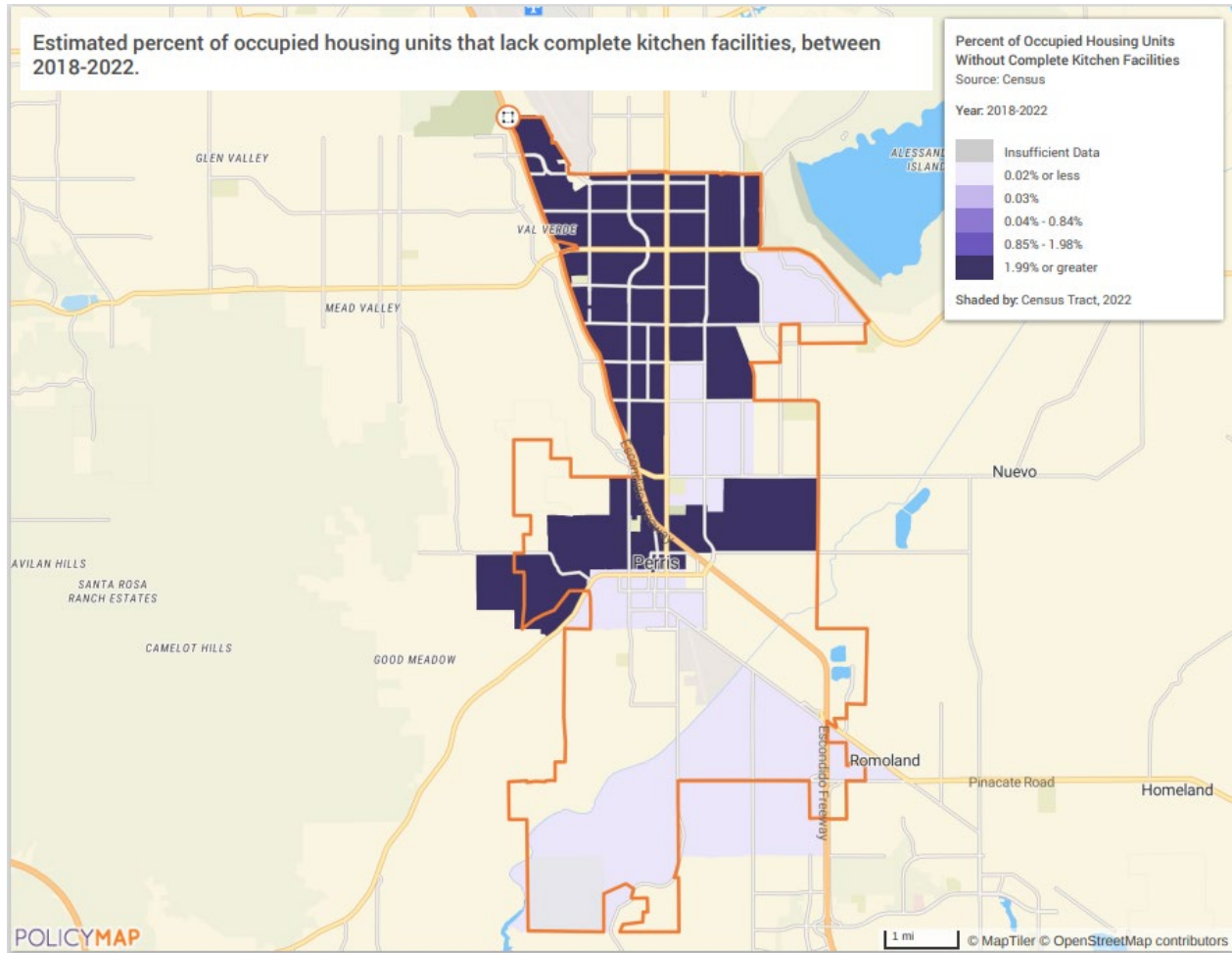


Over 16 percent (16.28%) of renter households between 2018-2022 had two or more housing conditions. The maps show the percentage of occupied housing units that lack complete plumbing facilities or that lack complete kitchen facilities, as well as the percentage of renter households experiencing at least two housing problems. The central and northern areas of the city are much denser with housing units that lack either complete plumbing facilities or kitchen facilities. As mentioned, these areas of the city have less housing unit options than southern areas. With less housing units and more units with housing problems in this area, there are fewer housing options available that are ideal for residents – especially special populations or lower-income households.

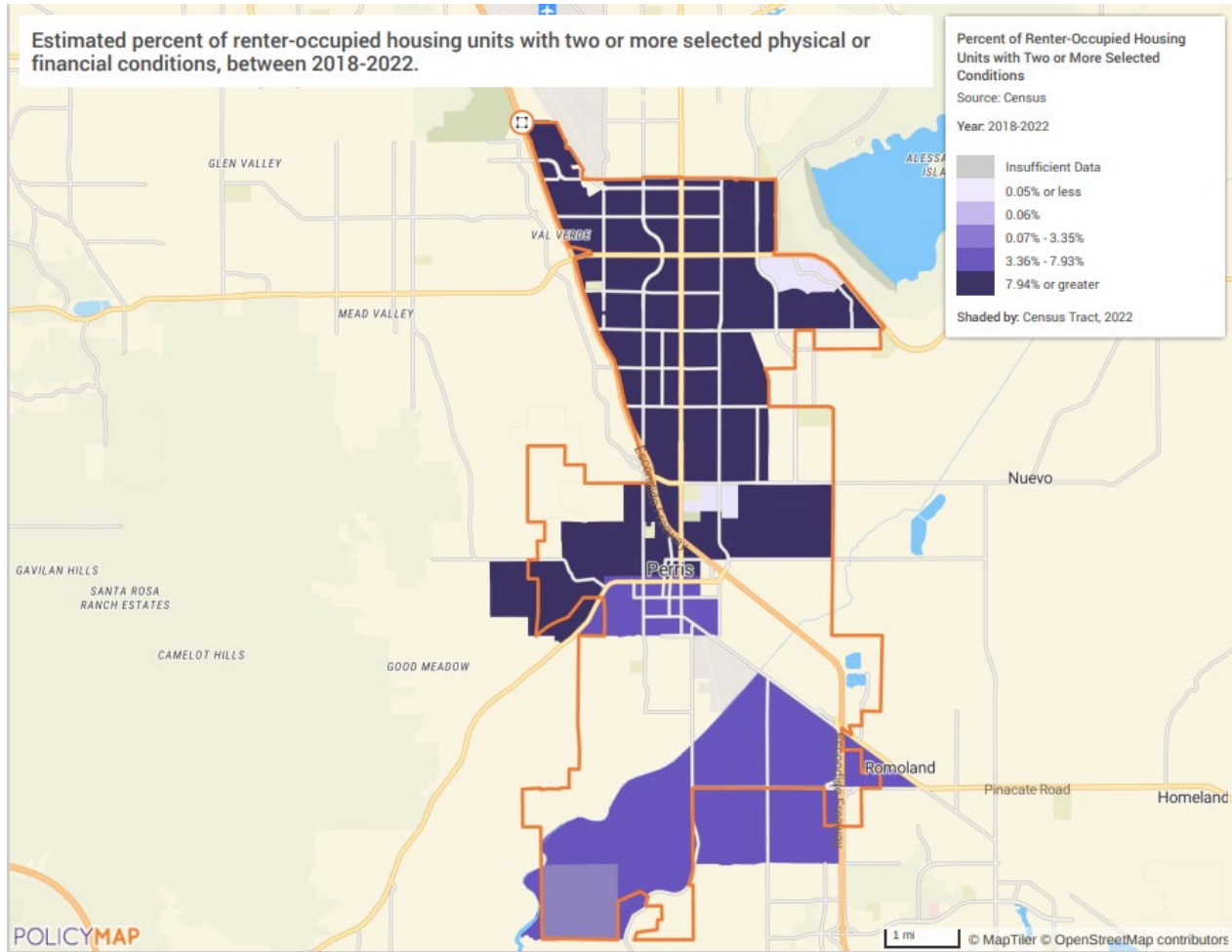
# Estimated Percent of Occupied Housing Units That Lack Complete Plumbing Between 2018-2022



# Estimated Percent of Occupied Housing Units That Lack Complete Kitchen Facilities Between 2018-2022



## Estimate Percent of Renter-Occupied Housing Units with Two or More Selected Physical or Financial Conditions Between 2018-2022



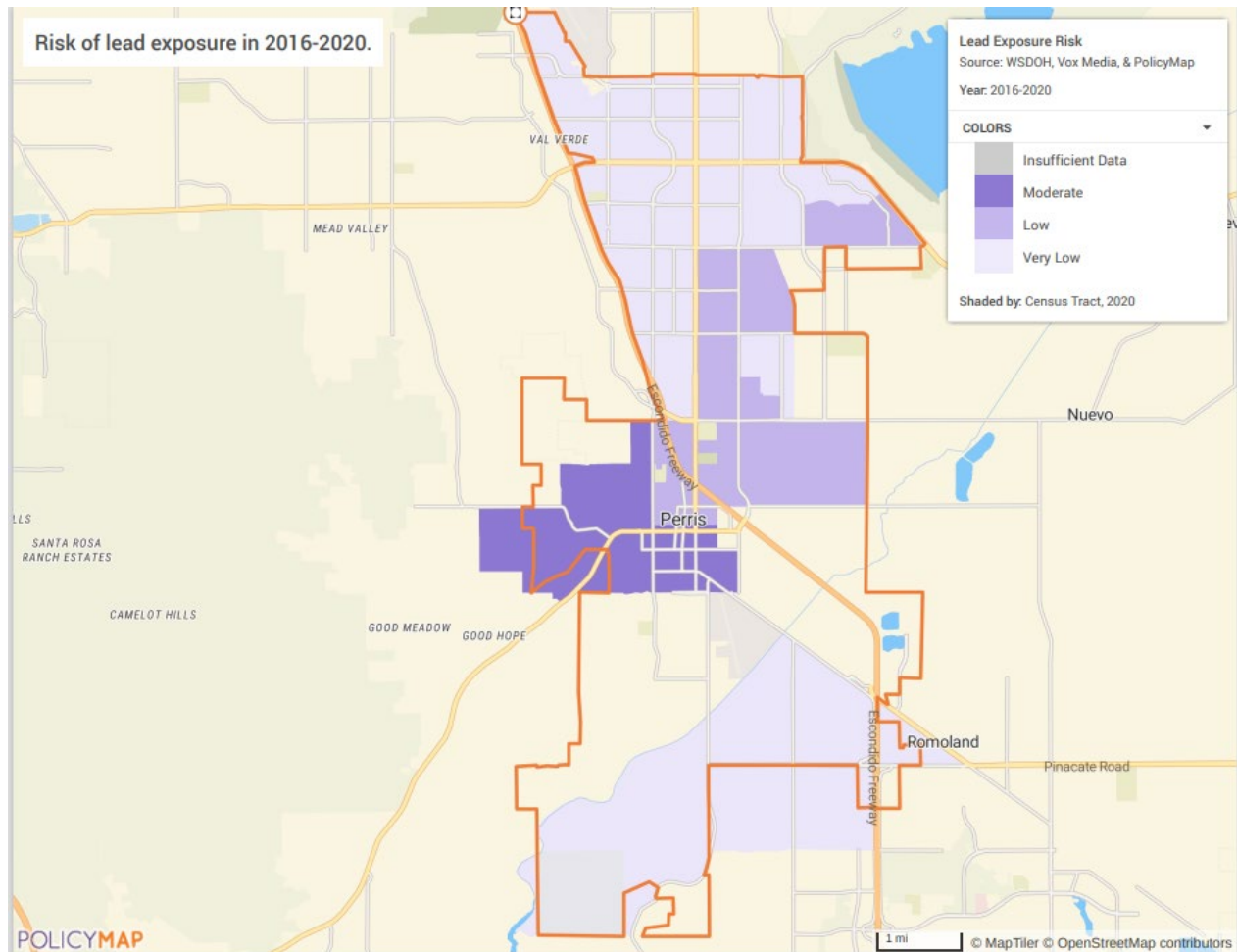
### Lead-Based Paint Hazards

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. Additionally, an aging housing stock is more likely to need repair and additional accommodations for aging populations and people with disabilities. According to the 2022 ACS, an estimated 2,008 units (representing about 10 percent of the housing stock) in the city, were constructed prior to 1980. The map below shows that the housing units in the central area of the city were more likely to be at risk of lead exposure between 2016-2020.

**Table 16. Housing Units by Age**

Year Structure Built	Number of Units	Percent
1939 or earlier	0	0%
1940-1959	788	3.9%
1960-1979	1,220	6%
1980-1999	7,672	37.7%
2000-2009	5,974	29.3%
2010-2019	4,347	21.3%
2020 or later	366	1.8%

**Risk of Lead Exposure in 2016-2020**





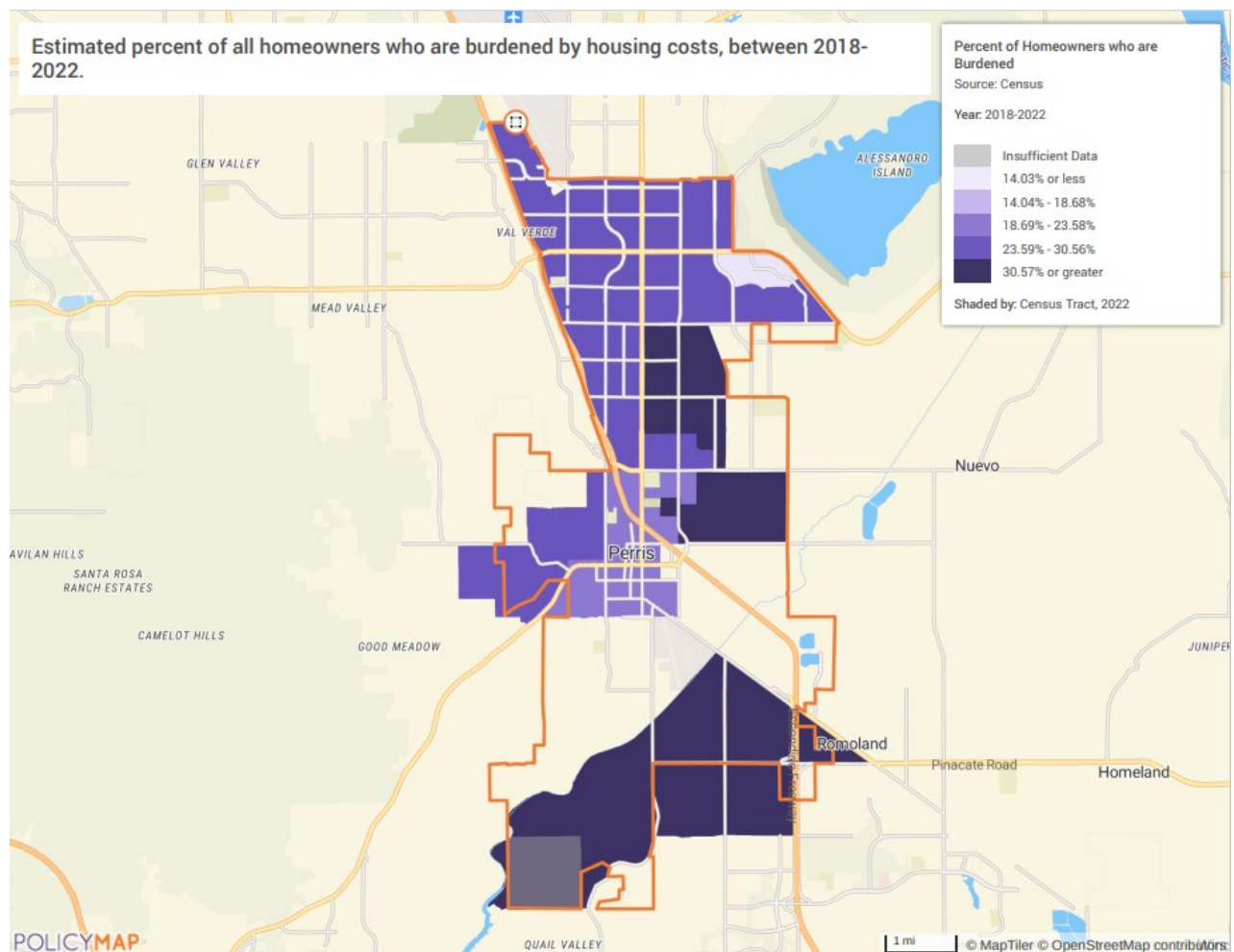
## F. Housing Cost and Affordability

The U.S. Census Bureau defines monthly housing costs as monthly rent or mortgage payments (including additional housing related fees such as homeowner insurance premiums) combined with utilities including water, sewer, and electric. Many housing problems (ie. Cost burden, overcrowding) are influenced by the cost of housing.

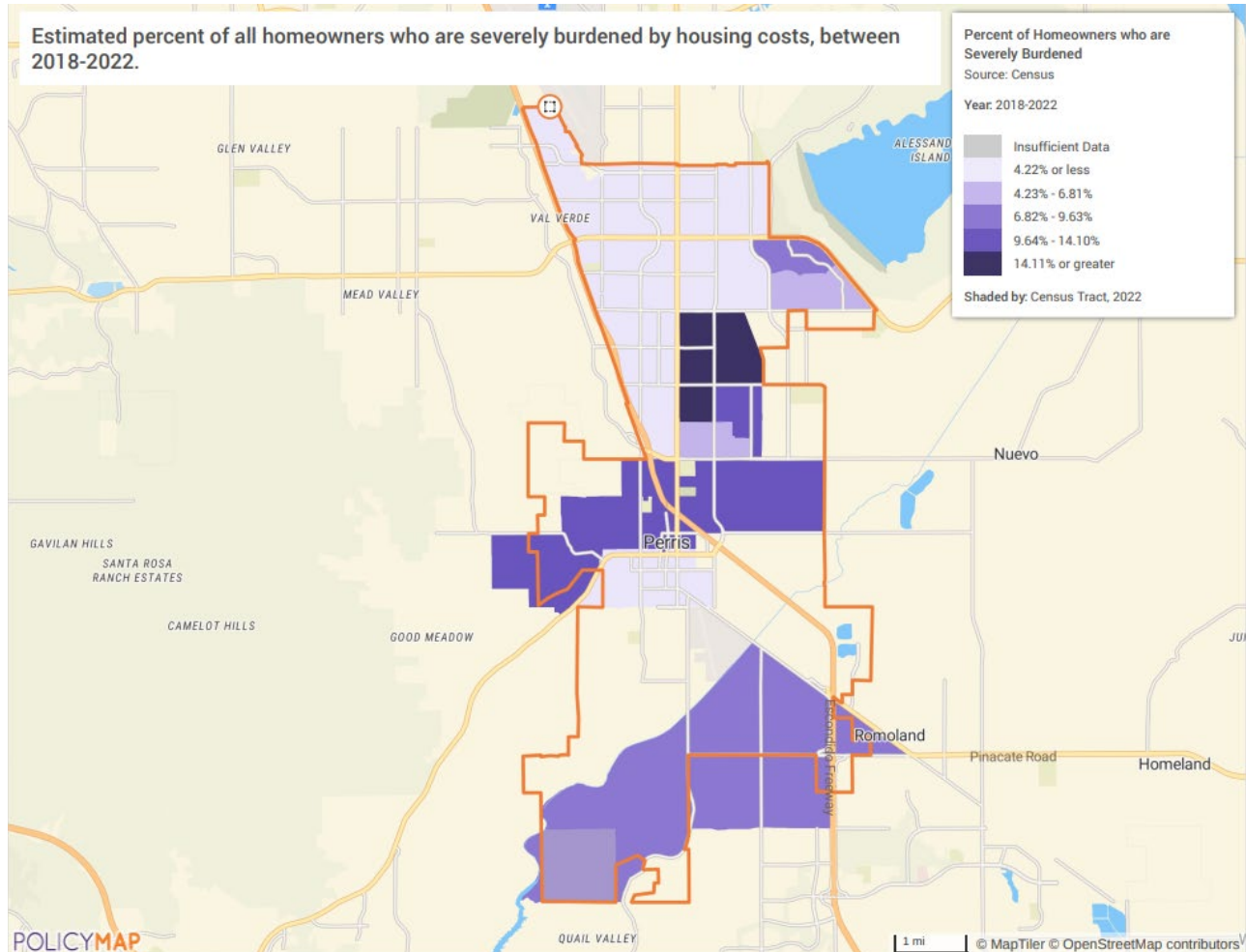
### 1. Ownership Housing Costs

Census data suggests that about 30 percent of all homeowner households in 2018-2020 were cost-burdened and almost 11 percent were severely cost-burdened. The maps show the density of cost-burdened and severely cost-burdened homeowner households. Cost-burdened homeowner households are widespread throughout the city, with larger density pockets in the south area and in the central area. Severely cost-burdened households are most prevalent in the city's central and northern central area.

### Estimated Percent of All Homeowners Who Are Burdened By Housing Costs Between 2018-2022



## Estimated Percent of All Homeowners Who Are Severely Burdened By Housing Costs Between 2018-2022

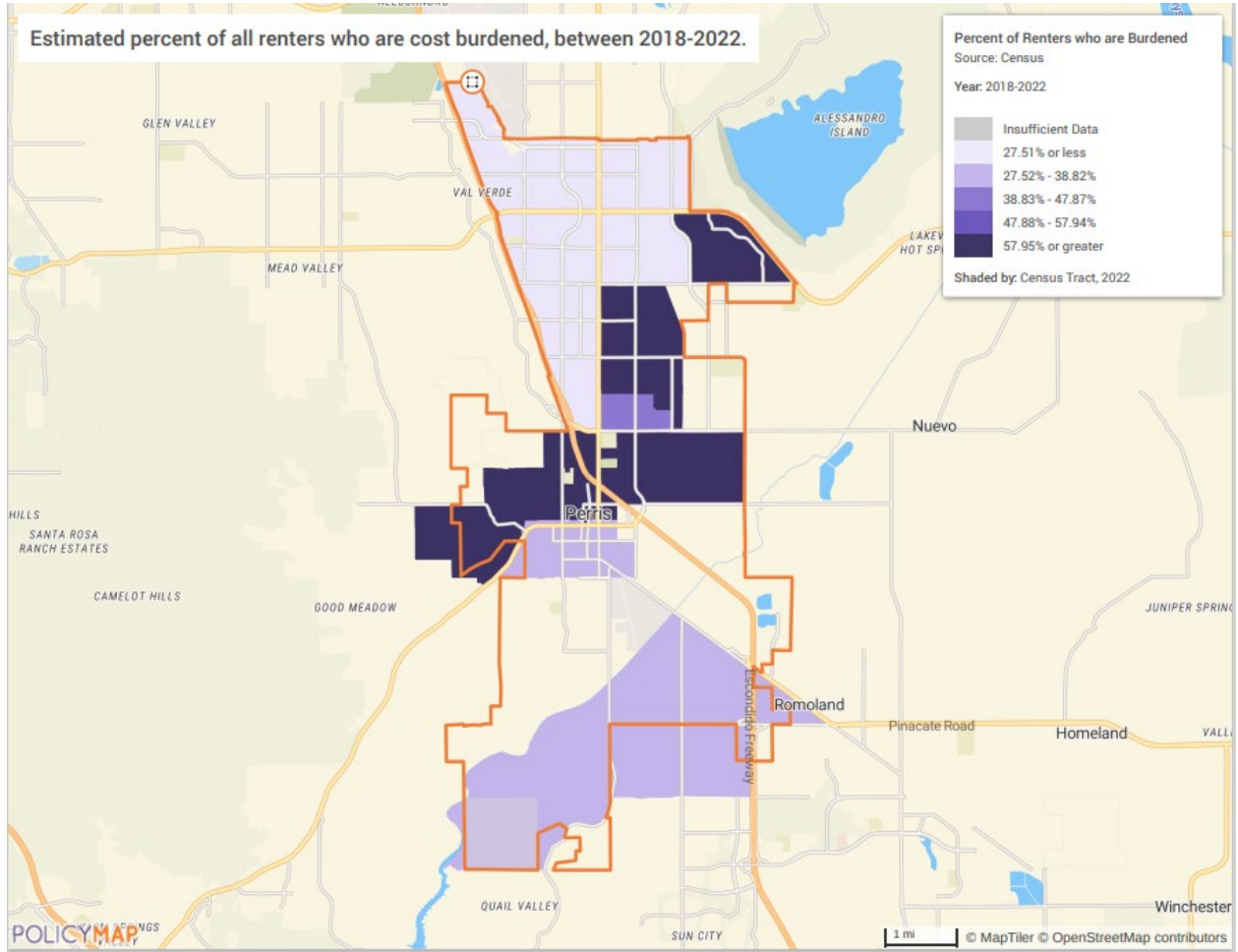


## 2. Rental Housing Costs

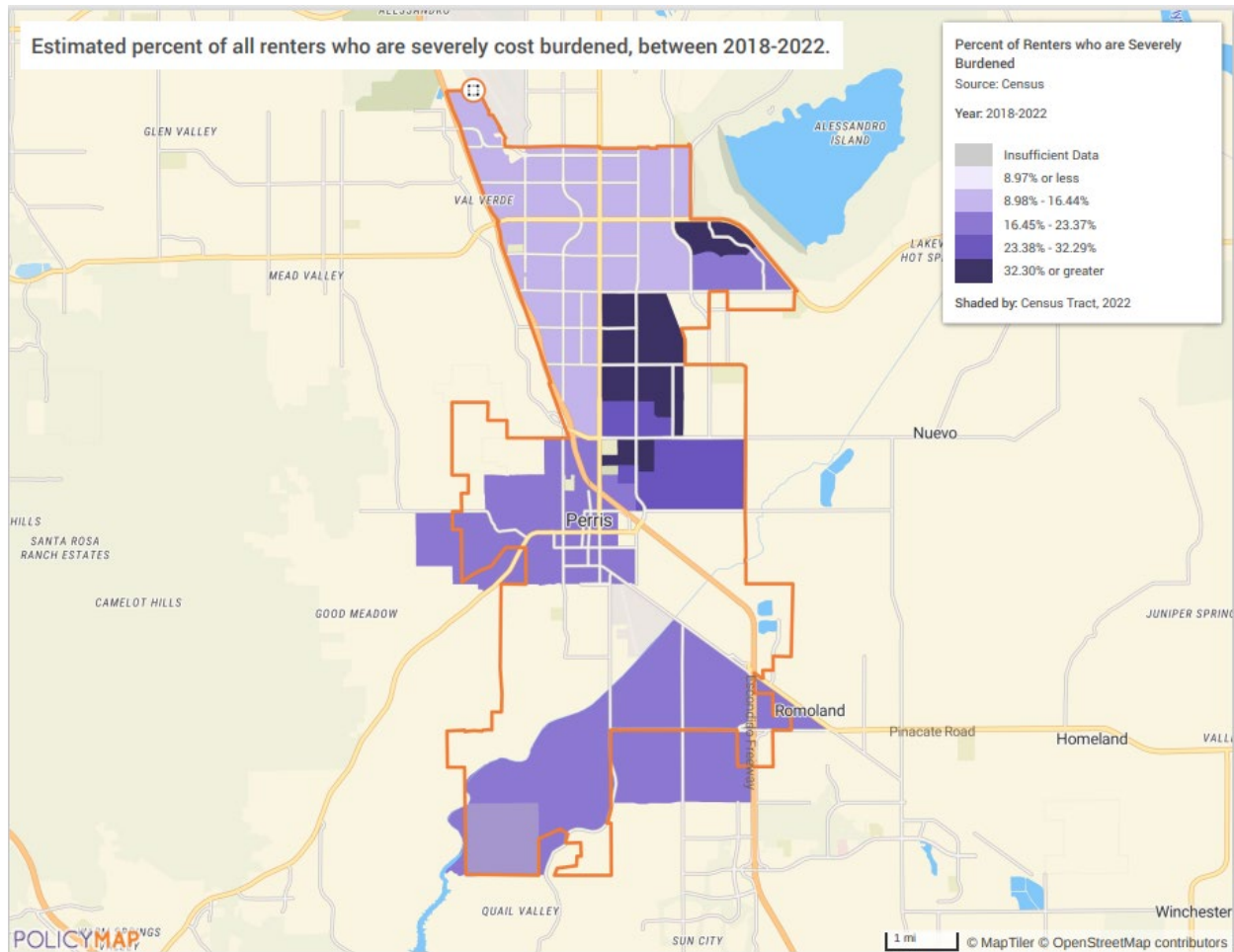
Census data suggests that almost 56 percent of renter households in 2018-2020 were cost-burdened and almost 20 percent were severely cost-burdened. Cost-burdened renter households were most prevalent in the central area of the city and northern central area of the city, with a pocket of density in the northern eastern region. Severely cost-burdened renter households were found in generally the same areas, but has more households affected in the southern area of the city as well.



## Estimated Percent of All Renters Who Are Cost Burdened Between 2018 and 2022



## Estimated Percent of All Renters Who Are Severely Cost Burdened Between 2018 – 2022



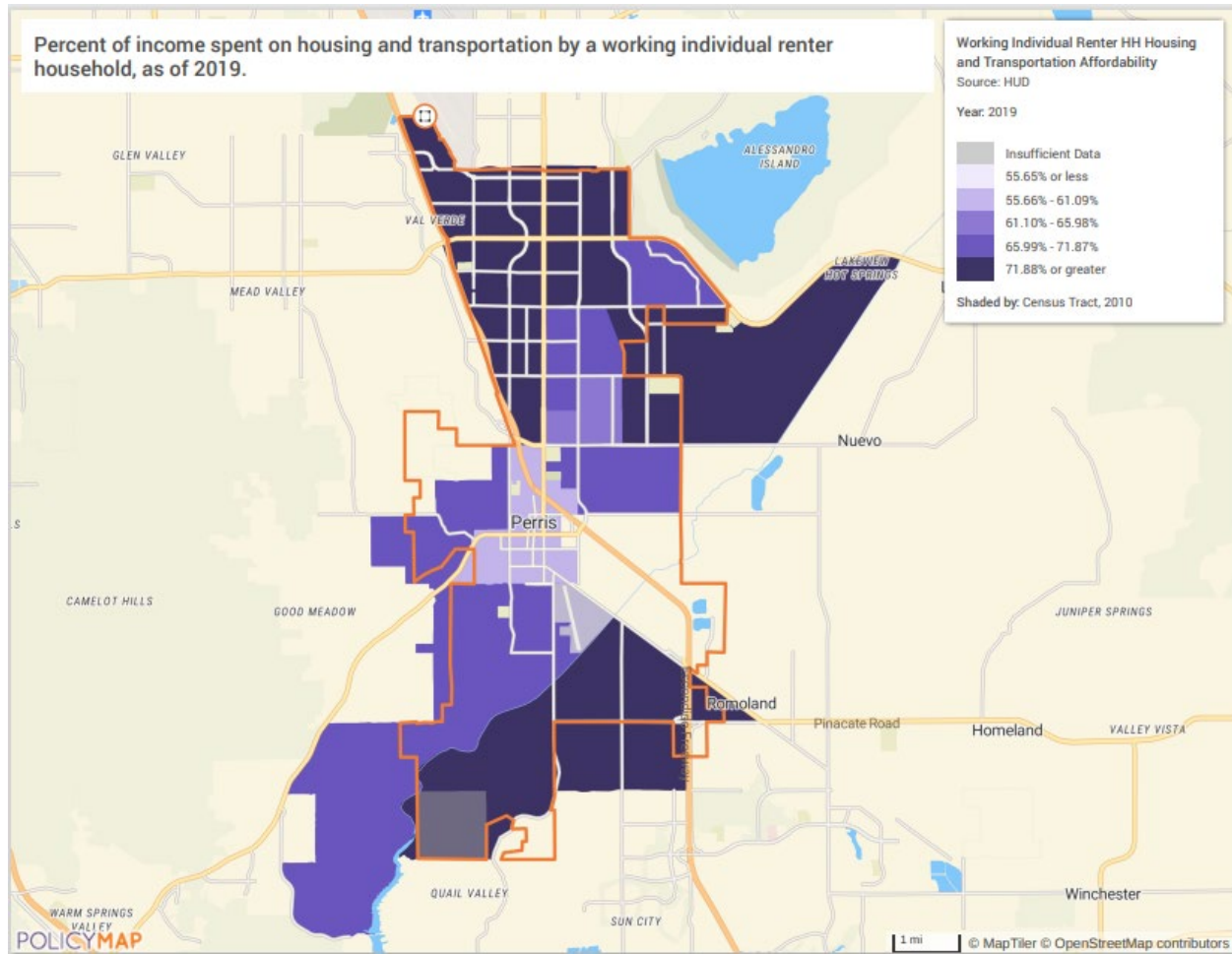
### 3. Housing Affordability

A renter is considered cost-burdened when they are putting 30% or more of their income towards rent. 2018-2022 ACS data suggests that 3,355 renters in the City of Perris were cost burdened. Almost 90 percent of cost-burdened renters were under 65 years of age. Knowing that most of the city comprises family units, most families were experiencing cost burden. The maps below reflect the lack of housing affordability in the city. The first map shows that most areas of the city have individuals paying upwards of 60 percent of their income on rent per month. For low-income individuals, many are paying more than 100 percent of their income on rent per month. Moderate income families are also experiencing affordability challenges, with most areas of the city showing these families spending more than 50 percent of their income on rent.

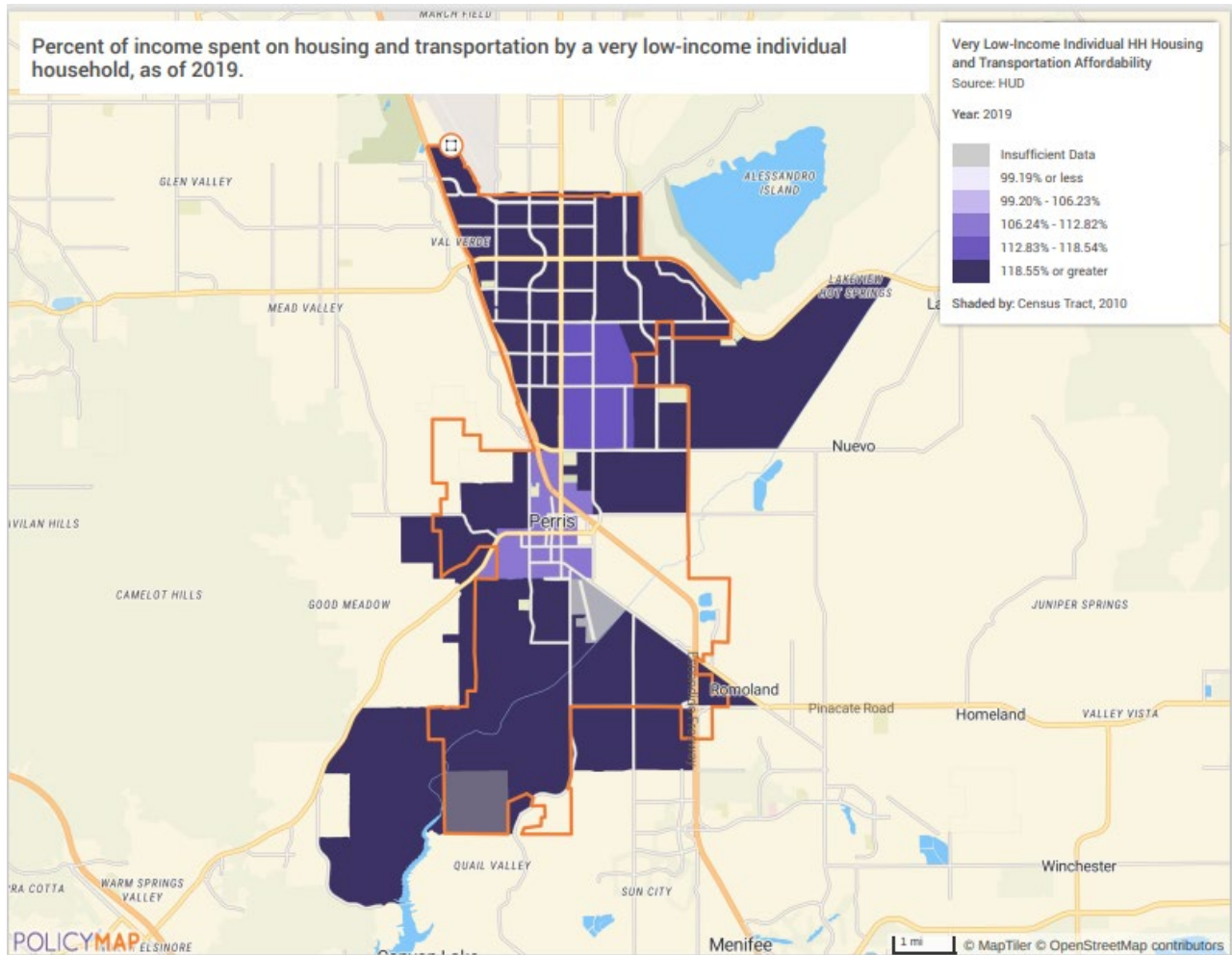
**Table 17. Rental Affordability**

Rental Affordability City of Perris 2018-2022 Census Data		
Burdens by Age	Cost Burdened Renters between 2018-2022	
	Number	Percent of all cost burdened renters
<b>City (Perris)</b>		
Under 65	2,964	88.35%
65 or older	391	11.65%
<b>County (Riverside)</b>		
Under 65	105,887	81.19%
65 or older	24,535	18.81%
<b>State (California)</b>		
Under 65	2,506,625	82.17%
65 or older	543,764	17.83%
Burdens by Annual Income	Cost Burdened Renters between 2018-2022	
	Number	Percent of all cost burdened renters
<b>City (Perris)</b>		
Less than \$20,000	695	20.72%
Less than \$50,000	2,100	62.59%
Less than \$75,000	2,910	86.74%
<b>County (Riverside)</b>		
Less than \$20,000	28,672	21.98%
Less than \$50,000	85,155	65.29%
Less than \$75,000	113,675	87.16%
<b>State (California)</b>		
Less than \$20,000	701,392	22.99%
Less than \$50,000	1,902,815	62.38%
Less than \$75,000	2,528,915	82.90%

# Estimated Income Spent on Housing and Transportation By a Working Individual Renter Household, as of 2019

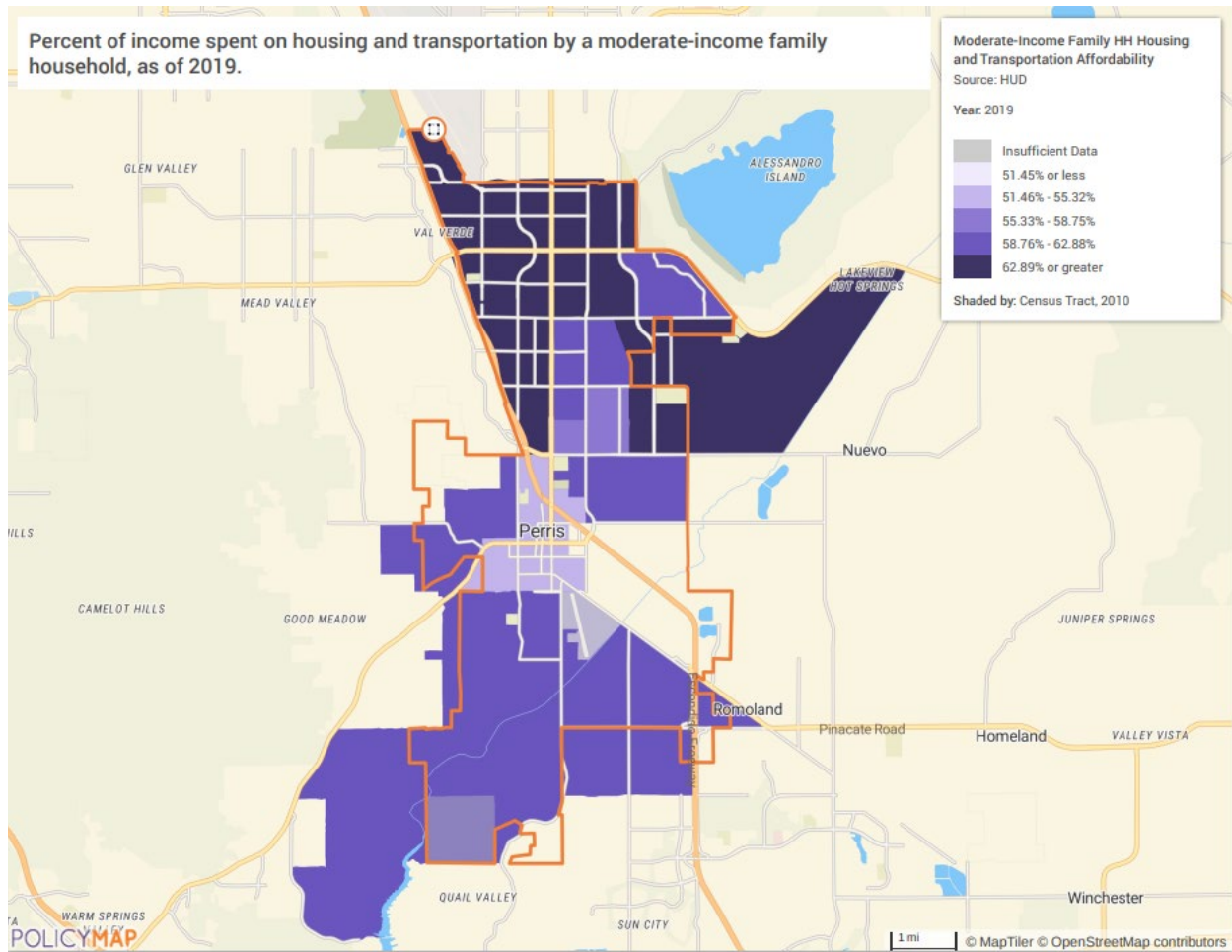


# Percent of Income Spent on Housing and Transportation by a Very Low Income Individual Household, as of 2019





## Percent of Income Spent on Housing and Transportation by a Moderate-Income Family Household, as of 2019



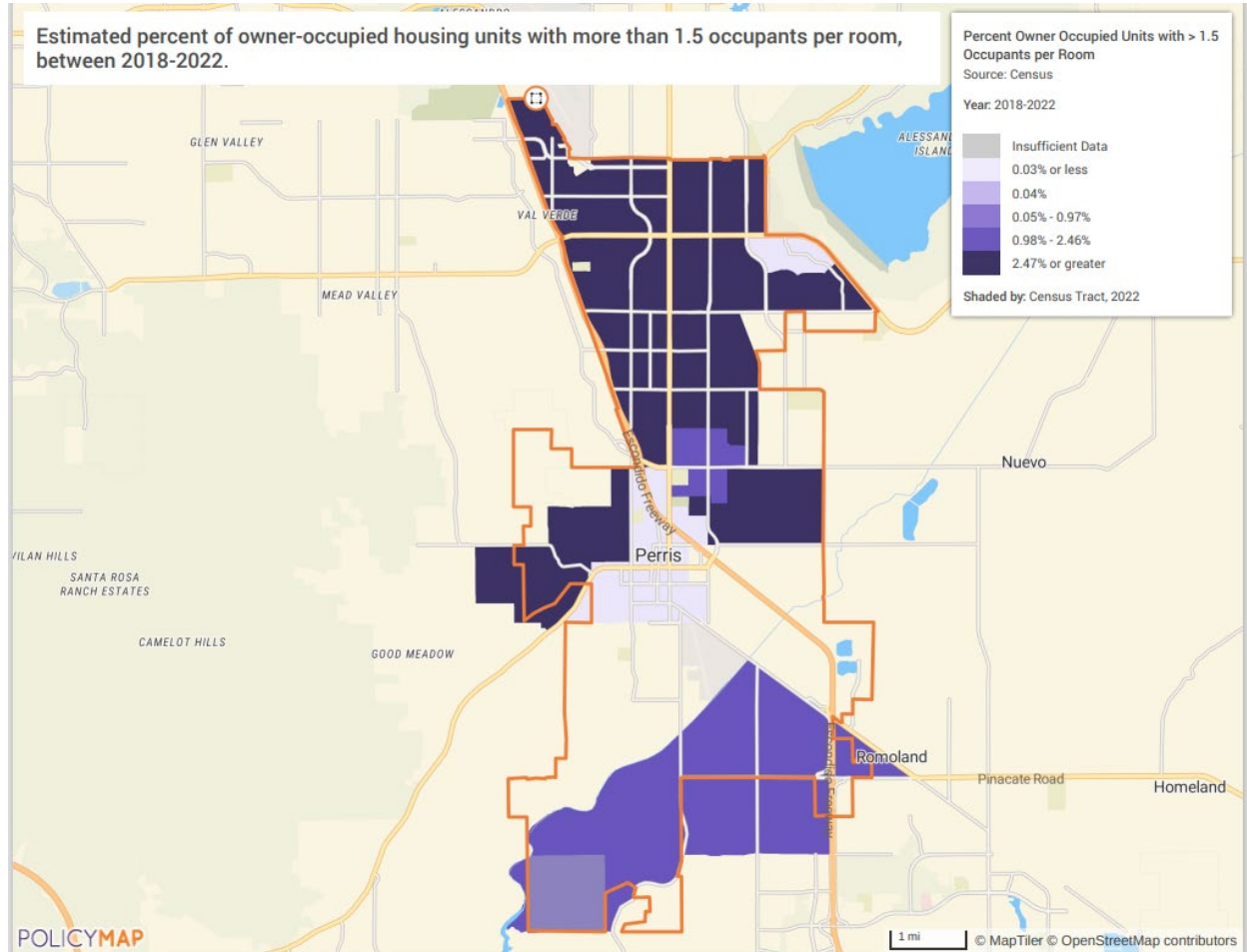
## G. Housing Problems

These housing problems will continue to impact the social and economic wellbeing of families and communities.

### 1. Overcrowding

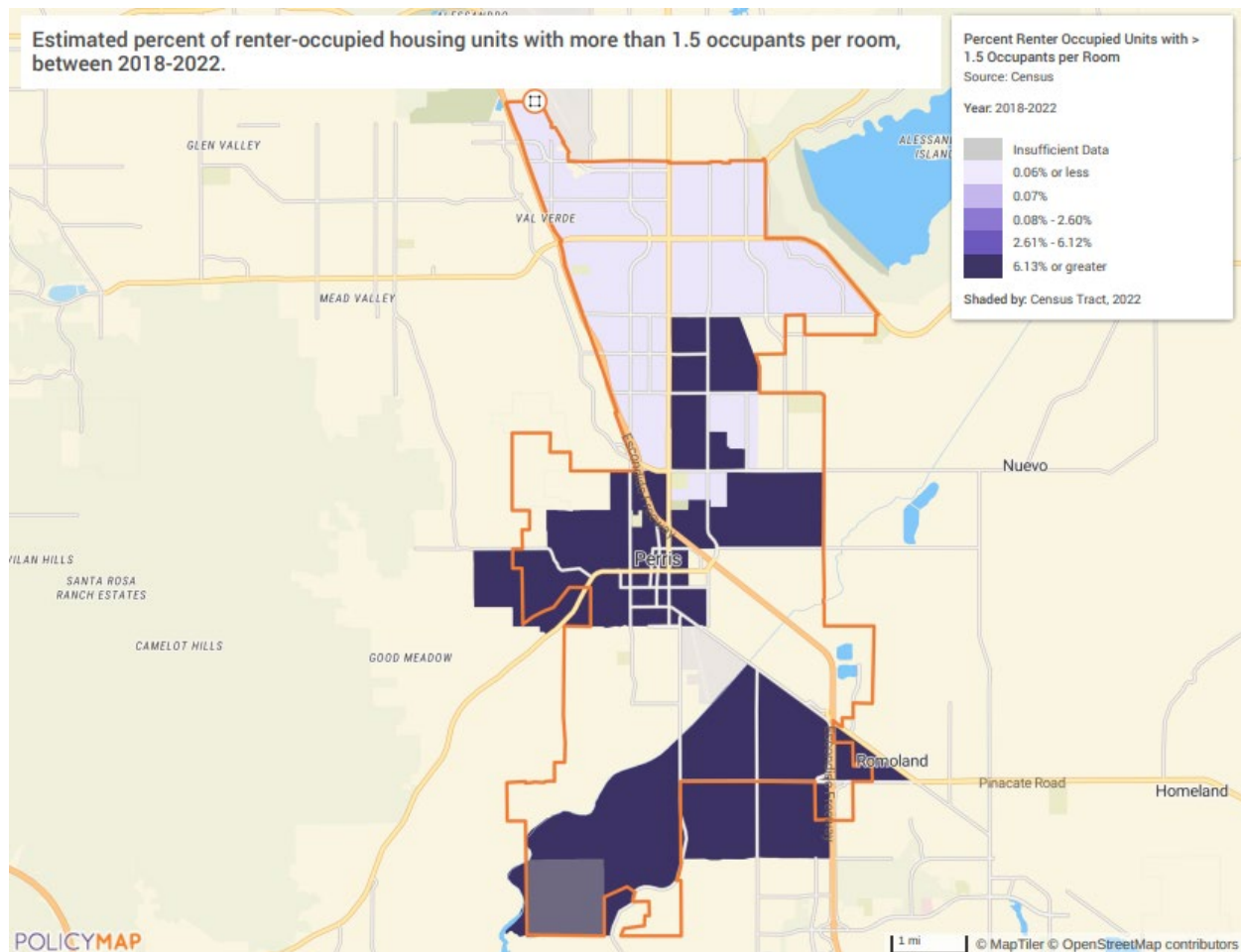
2018-2022 Census data estimates that 4.9% of Perris' owner-occupied housing units experienced overcrowding with more than 1.5 occupants per room. For renter-occupied housing units during the same period, 9.82% experienced overcrowding with more than 1.5 occupants per room.

# Estimated Percent of Owner-Occupied Housing Units with More Than 1.5 Occupants Per Room





## Estimated Percent of Renter-Occupied Housing Units With More Than 1.5 Occupants Per Room, Between 2018-2022



## 2. Housing Cost Burden

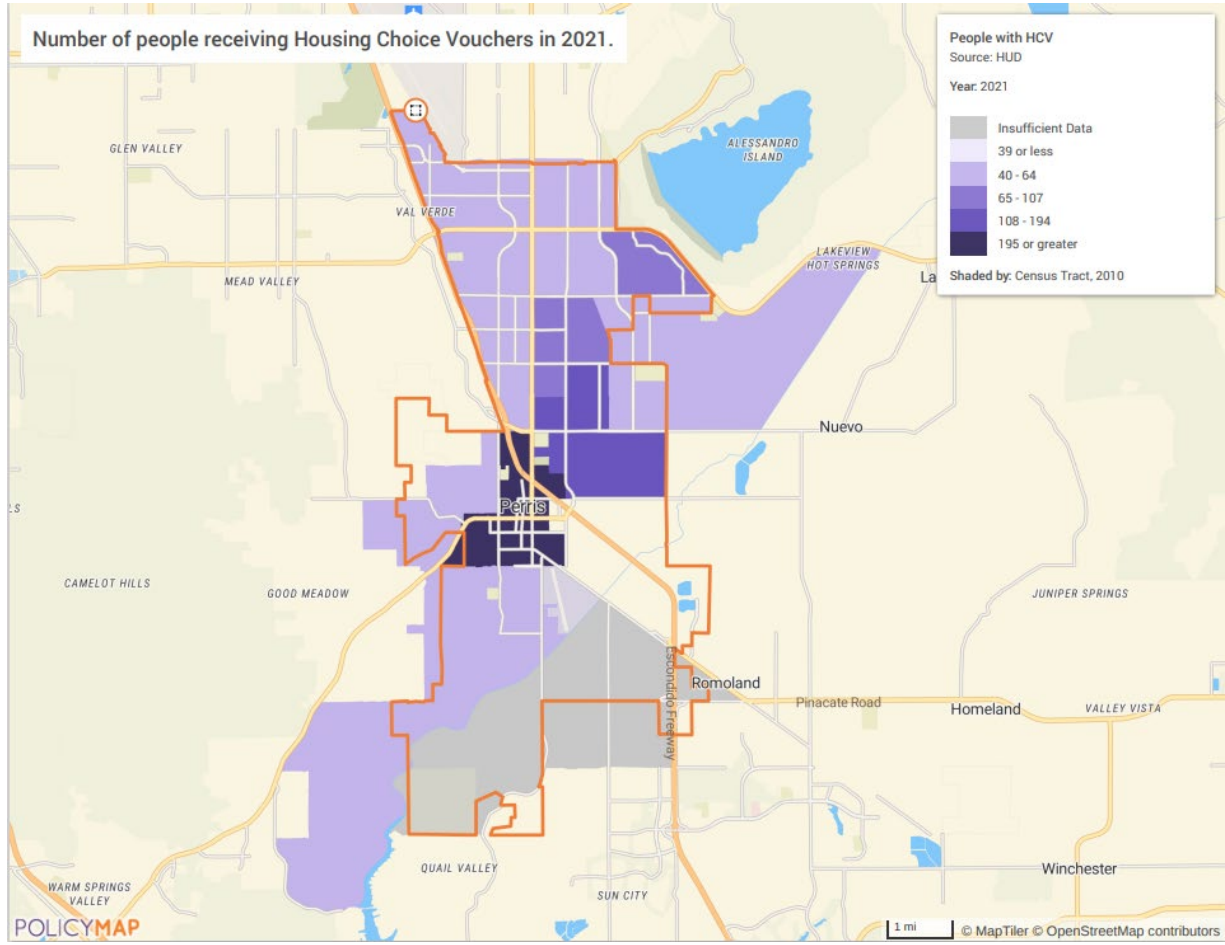
See Section II.F. on Housing Affordability.

## H. Assisted Housing

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.

According to HUD data, in 2021 there were 1,039 residents with Housing Choice Vouchers in the City of Perris.

# Number of People Receiving Housing Choice Vouchers in 2021





### **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**

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™. 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.



## 2. Analysis

### Access to Mortgage Services

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 19884. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;
3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

1. The institution must be a for-profit organization;
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year; and
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent the best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2016, the most recent year for which these data are available.



The table below shows the purpose of loan by year for Riverside County in 2022 (the most recent data available). As seen therein, there were 139,406 loans during this time period, of these 58,229 (41.8%) were for home purchases.

**Table 18. Number and Percent of Loans by Type, 2022**

Loan Purpose Summary		
Riverside County, 2022		
Purpose	#	%
<b>Home purchase</b>	<b>58229</b>	<b>41.8%</b>
<b>Cash-out refinancing</b>	<b>40498</b>	<b>29.1%</b>
<b>Refinancing</b>	<b>17355</b>	<b>12.4%</b>
<b>Home improvement</b>	<b>12316</b>	<b>8.8%</b>
<b>Other purpose</b>	<b>11008</b>	<b>7.9%</b>

**Denial Rates**

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- “Originated,” which indicates that the loan was made by the lending institution;
- “Approved but not accepted,” which notes loans approved by the lender but not accepted by the applicant;
- “Application denied by financial institution,” which defines a situation wherein the loan application failed;
- “Application withdrawn by applicant,” which means that the applicant closed the application process;
- “File closed for incompleteness” which indicates the loan application process was closed by the institution due to incomplete information; or
- “Loan purchased by the institution,” which means that the previously originated loan was purchased on the secondary market.

As shown in the table below, 139,406 home purchase loan applications originated in 2022, and 23,687 were denied. Denials represented 17% of all application outcomes. The most common reasons cited in the decision to deny one of these loan applications related to the debt-to-income ratio of the prospective homeowner, as shown in the table below. Credit history and incomplete credit applications were also commonly given as reasons to deny home purchase loans:

**Table 19. Reasons Cited for Denied Loan Applications, 2022**



## Reason Cited for Denied Applications

Riverside County, 2022

Reason	#	%
<b>Debt-to-income ratio</b>	<b>8238</b>	<b>34.8%</b>
<b>Credit history</b>	<b>5322</b>	<b>22.5%</b>
<b>Credit application incomplete</b>	<b>3758</b>	<b>15.9%</b>
<b>Collateral</b>	<b>2389</b>	<b>10.1%</b>
<b>Other</b>	<b>2188</b>	<b>9.2%</b>
<b>Unverifiable information</b>	<b>1005</b>	<b>4.2%</b>
<b>Insufficient cash (downpayment, closing costs)</b>	<b>580</b>	<b>2.4%</b>
<b>Employment history</b>	<b>200</b>	<b>0.8%</b>
<b>Mortgage insurance denied</b>	<b>7</b>	<b>0.0%</b>

Denial rates were observed to differ by race and ethnicity, as shown in the following table. While White applicants had a denial rate of 17.2 percent in 2022, Black or African American applicants had a denial rate of 22.1 percent. American Indian or Alaska Native, Native Hawaiian or Other Pacific Islanders, and applicants identifying by two or more races also had a denial rate higher than the average, at 24.2 percent, 22.7 percent and 28 percent, respectively. Denial rates for applicants identifying as Hispanic or Latino were higher than applicants who did not, at 20.5 percent (compared to 17.2 percent among applicants who did not):





**Table 20. Loan Denials by Race and Ethnicity**

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Denial Rate by Race  
Riverside County, 2022

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Race	%
<b>White</b>	<b>17.2%</b>
<b>Asian</b>	<b>17.8%</b>
<b>Black or African American</b>	<b>22.1%</b>
<b>Native Hawaiian or Other Pacific Islander</b>	<b>22.7%</b>
<b>American Indian or Alaska Native</b>	<b>24.2%</b>
<b>2 or more minority races</b>	<b>28.0%</b>

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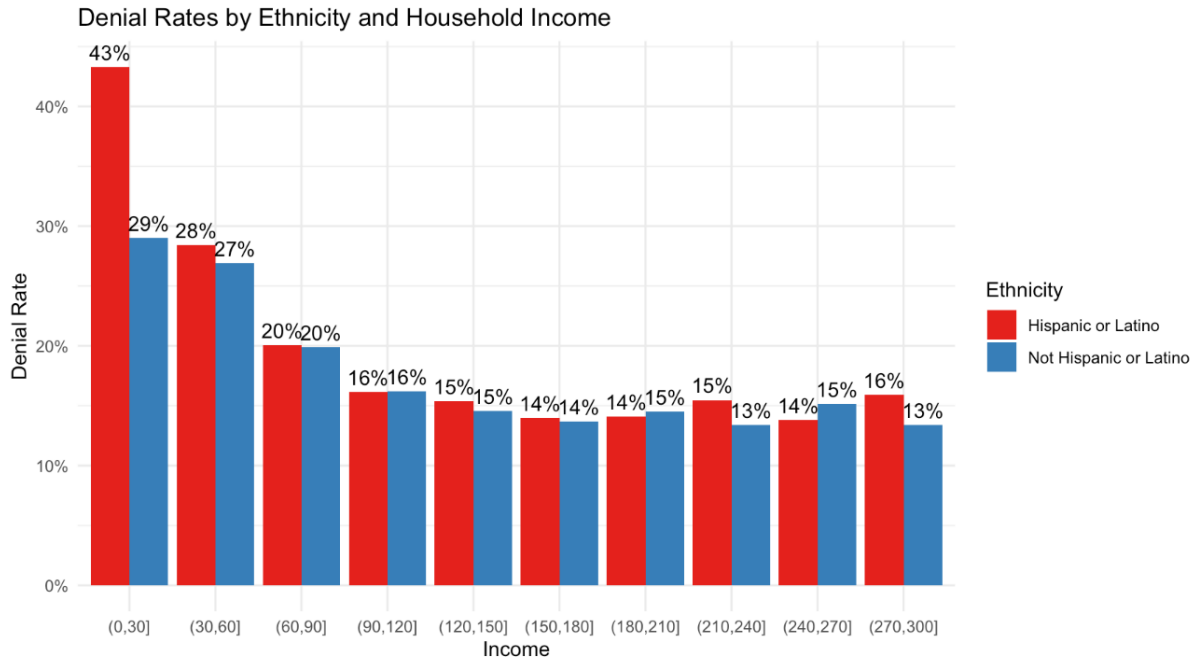
Denial Rate by Ethnicity  
Riverside County, 2022

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Ethnicity	%
<b>Not Hispanic or Latino</b>	<b>17.2%</b>
<b>Hispanic or Latino</b>	<b>20.5%</b>

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Further investigation into the discrepancy in denial rates between Hispanic or Latino and non-Hispanic or Latino applicants reviews a persistent gap in denial prevalence that remains, especially for those earning extremely low incomes. The chart below depicts denial rates by ethnicity (for Hispanic or Latino and non-Hispanic or Latino applicants) and income (in thousands of dollars per year):



The chart reveals that Hispanic or Latino applicants faced higher denial rates across most income levels. For those earning \$0-30,000 per year, the denial gap was extreme. The denial rate for Hispanic or Latino households earning \$0-30,000 per year was 43%, while the denial rate for non-Hispanic or Latino households earning the same amount annually was 29%.

The reasons cited for denials for Hispanic or Latino and non-Hispanic or Latino also differ. The table below reveals that credit history was cited as one of the top reasons for denial for 25.1 percent of applicants submitted by Hispanic or Latino households, whereas that same reason was only cited in 21.6 percent of applications submitted by non-Hispanic or Latino households:



**Table 21. Reasons Cited for Denied Applications.**

Reason Cited for Denied Applications			
Riverside County, 2022			
Reason	#	total	%
Hispanic or Latino			
<b>Debt-to-income ratio</b>	<b>2609</b>	<b>7247</b>	<b>36.0%</b>
<b>Credit history</b>	<b>1816</b>	<b>7247</b>	<b>25.1%</b>
<b>Credit application incomplete</b>	<b>1052</b>	<b>7247</b>	<b>14.5%</b>
<b>Collateral</b>	<b>626</b>	<b>7247</b>	<b>8.6%</b>
<b>Other</b>	<b>608</b>	<b>7247</b>	<b>8.4%</b>
<b>Unverifiable information</b>	<b>276</b>	<b>7247</b>	<b>3.8%</b>
<b>Insufficient cash (downpayment, closing costs)</b>	<b>186</b>	<b>7247</b>	<b>2.6%</b>
<b>Employment history</b>	<b>72</b>	<b>7247</b>	<b>1.0%</b>
<b>Mortgage insurance denied</b>	<b>2</b>	<b>7247</b>	<b>0.0%</b>
Not Hispanic or Latino			
<b>Debt-to-income ratio</b>	<b>3604</b>	<b>10126</b>	<b>35.6%</b>
<b>Credit history</b>	<b>2183</b>	<b>10126</b>	<b>21.6%</b>
<b>Credit application incomplete</b>	<b>1425</b>	<b>10126</b>	<b>14.1%</b>
<b>Collateral</b>	<b>1153</b>	<b>10126</b>	<b>11.4%</b>
<b>Other</b>	<b>1009</b>	<b>10126</b>	<b>10.0%</b>
<b>Unverifiable information</b>	<b>409</b>	<b>10126</b>	<b>4.0%</b>
<b>Insufficient cash (downpayment, closing costs)</b>	<b>254</b>	<b>10126</b>	<b>2.5%</b>
<b>Employment history</b>	<b>86</b>	<b>10126</b>	<b>0.8%</b>
<b>Mortgage insurance denied</b>	<b>3</b>	<b>10126</b>	<b>0.0%</b>

According to the table below, only 0.1% of loans were for high-cost mortgages. The vast majority of loans in Riverside County in 2022 were for non-high-cost mortgages.



**Table 22. HOEPA Loan Summary, 2022**

HOEPA Loans		
Riverside County, 2022		
Loan Type	#	%
<b>Not a high-cost mortgage</b>	<b>70865</b>	<b>99.9%</b>
<b>High-cost mortgage</b>	<b>98</b>	<b>0.1%</b>

The analysis presented in this section suggests that credit history is a key factor cited as the denial reason separating Hispanic or Latino and non-Hispanic or Latino households in application outcomes. Interventions that seek to narrow this discrepancy should consider focusing on applicant credit histories and review of discriminatory practices in the review of applicant incomes relative to loan size requests.

### **Home Purchase Loans**

In 2022, 58,229 households in Riverside County applied for home purchasing loans. 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.

### **Home Improvement Loans**

In 2022, 8.8% of all home loan applications in Riverside County were for home improvement. 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.

### **Refinancing**

In 2022, 12.4 percent of all home loan applications in Riverside County were for 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.

## **C. 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, several 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.



## **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:

1. 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;
2. Assist in the development of adequate housing to meet the needs of low and moderate income households;
3. Address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing;



4. Conserve and improve the condition of the existing affordable housing stock; and
5. 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 City Council adopted the adopted the new Housing Element for 2021-2029 on January 25, 2022 and HCD adopted it on August 17, 2022.

The 2021-2029 Housing Element is part of the new update cycle for jurisdictions within the SCAG (Southern California Association of Governments) region to allow for synchronization with Connect SoCal, the 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). The Element sets forth an 8-year strategy to address the City's identified housing needs, including specific implementing programs and activities. Various amendments had been made to Housing Element law since adoption of the City's previous Housing Element. These include, but are not limited to:

- SB 330 - Housing Crisis Act of 2019 and Changes to Permit Streamlining Act & Housing Accountability Act - is designed to speed up housing construction by slashing the time it takes to obtain building permits, limiting fee increases on housing applications, and requiring that a local agency makes specified written findings based on evidence to deny an affordable housing development.
- AB 678, AB 1515, AB 3194, SB 330 - Housing Accountability Act - Expands and strengthens the provisions of the Housing Accountability Act by establishing limitations on a local government's ability to deny, reduce the density of, or make infeasible housing development projects, emergency shelters, or farmworker housing that are consistent with objective local development standards and contribute to meeting housing need.
- AB 1397, AB 1486, AB 686, SB 6 - Housing Element Sites Inventory - Modifies the format and level of scrutiny required when evaluating a jurisdiction's inventory of land suitable and available for residential development to meet the regional housing need by income level.
- AB 686 - Affirmatively Furthering Fair Housing - All housing elements must now include an analysis and programs that affirmatively furthers fair housing and promotes housing opportunities throughout the community for protected classes.
- AB 881, AB 68, and SB 13 - Accessory Dwelling Units - Updates and clarifies requirements and laws regarding the creation of accessory dwelling units (ADU) and junior accessory dwelling units (JADU) to address barriers to development.
- AB 1763 - Density Bonuses for Affordable Housing - Provides increased density and incentives to produce developments that include moderate-income housing and additional incentives for affordable developments within ½ mile of a transit stop.

## **2. General Plan Land Use Element**

Several 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.



**Table 23. 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 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 Assembly Bill (AB) 1287, effect in 2024, amends the State Density Bonus Law to create additional density bonuses for developers who provide deed-restricted affordable units beyond the previous maximum percentages in the law. Among other changes, it amends the Density Bonus Law to grant five incentives and concessions (increased from four) to projects that are 100% affordable to lower-income households, except that up to 20% of the units may be for moderate-income households. The bill also adds a provision granting four concessions and incentives to projects that are at least 16% affordable to very low-income households, or at least 45% affordable to moderate-income households in a development in which the units are for sale.

Most significantly, AB 1287 adds major new density bonuses on top of those provided by the prior version of the Density Bonus Law. The prior Density Bonus Law allowed up to a 50% density bonus to a project that includes 15% very low-income units, 24% low-income units, or 44% moderate-income (for sale) units. Now, there is an additional (second) density bonus for those projects that meet and exceed those percentages, based on a sliding scale. Under the prior Density Bonus Law, for example, a project that made 20% of units affordable to very low-income households would receive no extra reward for exceeding the maximum very low-income percentage of 15%. Under the new law, the additional 5% of units provided for very low-income households would entitle the developer to an extra 20% density bonus – stacked on top of the 35% bonus provided for the 15% set-aside under the original law, this results in a total bonus of 55%. The new additional bonuses provided under AB 1287 could allow for density bonuses of up to 100% of base density.

### **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. 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 24. 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 spaces. Detached Residential, R-6,000 Zone: 2 garage spaces.	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 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. <ul style="list-style-type: none"> <li>▪ Studio Unit: 1 space/unit.</li> <li>▪ One Bedroom Unit: 1 space/unit.</li> <li>▪ Two Bedroom Unit: 1.5 spaces/unit.</li> <li>▪ Each additional bedroom: 0.25 spaces/unit up to 10 spaces, and 0.010 spaces/unit exceeding 10 spaces.</li> </ul>	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.*

## 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.

## **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.

### **3. 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. Chapter 19.87 of the Zoning Code provides for reasonable accommodation for persons with disabilities. The City of Perris is processing a comprehensive update of the Zoning Code and Specific Plan. The Zoning Code Amendment and Specific Plan Amendments are tentatively scheduled to be considered by the City Council in October 2024 for compliance with the Housing Element adopted in October 2022.

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.

### **4. Local Housing Authorities**

The Housing Authority of the County of Riverside (HACR) administers the Housing Choice Voucher Program for the City of Perris.

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.

HACR administers its programs with certain preferences as described in its Administrative Plan for the Housing Choice Voucher Program, which can be found on its website.

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.

## **5. 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.

### **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.





COMMITTEE MEETINGS	
Policy Committee	Meeting Schedule
Beautification Committee	Scheduled for the 3rd Tuesday of every other month
Community Development Block Grant (CDBG) Committee	Meet as needed
Economic Development Committee	Scheduled for the 1st Friday of every other month
Homeless Task Force Committee	Meet as needed
Human Resources Committee	Scheduled for the 3rd Thursday of every other month
Parks & Recreation Committee	Scheduled for every 3rd Wednesday
Public Safety Committee	Scheduled for the 1st Friday of every odd month
Public Works Committee	Scheduled for the 3rd Wednesday of every odd month
School District Liaison Committee	Meet as needed
Senior Citizen Committee	Meet as needed
Water Utility Ad Hoc	Meet as needed
Ways & Means Committee	Scheduled for the last Thursday of every odd month

### **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.

### **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.

### **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:

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

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.

#### Lending

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, disability, familial status, national origin, sexual orientation, or gender identity.

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, disability, familial status, national origin, sexual orientation, or gender identity.

### **Diversity Certification**

NAR has created a diversity certification, “At Home with Diversity: One America” to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR “At Home with Diversity” course. The certification will signal to customers that the real estate



professional has been trained on working with diversity in today's real estate markets. The coursework provides valuable business planning tools to assist real estate professionals in reaching out and marketing to a diverse housing market. The NAR course focuses on diversity awareness, building cross-cultural skills, and developing a business diversity plan.

### **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**

Legally, applicants for rental units 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.

Under California's fair housing law, source of income is a protected class. This includes, but is not limited to, the Section 8 voucher/HCV program, the HUD-VASH program, Homelessness Prevention and Rapid Re-Housing programs, Housing Opportunities for Persons with AIDS, and security deposit assistance programs that help people afford their rent. The law also protects the use of subsidy programs created by cities, counties, and public agencies to address growing homelessness. The law also protects people from source of income discrimination in housing other than rental housing. Therefore, a rental add that states Section 8 or any other rental subsidy is not accepted is discriminatory.

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.

#### **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>

#### **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.

Recent State legislation under SB 267 offers protections against credit-based biases. In instances where an applicant intends to use a governmental rent subsidy (such as a Section 8 voucher) to rent an apartment, this bill makes it illegal for a landlord to use the applicant's credit history as part of the application process without offering the applicant the option, at the applicant's discretion, of "alternative evidence of reasonable ability to pay" the rent for the unit, including, but not limited to, government benefit payments, pay records, and bank statements.

### **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 and 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, landlords have historically asked for a security deposit higher than for others. Under State bill **AB 12**, effective July 1, 2024, it shall be unlawful for a residential landlord to require a security deposit in excess of one month's rent, regardless of whether the unit in question is furnished or unfurnished. The bill includes an exception for small landlords, allowing up to two months' rent to be held as a deposit if the landlord (1) is a natural person or a limited liability company in which all members are natural persons, and (2) owns no more than two residential rental properties that collectively include no more than four rental units.

### **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:

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

The CAA supports the intent of all local, State, and federal fair housing laws for all residents. 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:

1. Protect the public from fraud, misrepresentation, and unethical practices of property managers.
2. Adhere to the Federal Fair Housing statutes.
3. Protect the fiduciary relationship of the client.
4. Treat all tenants professionally and ethically.
5. Manage the property in accordance with the safety and habitability standards of the community.
6. Hold all funds received in compliance with state law with full disclosure to the client.

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

1. Residential Management Professional, RMP<sup>®</sup>
2. Master Property Manager, MPM<sup>®</sup>
3. Certified Residential Management Company, CRMC<sup>®</sup>
4. Certified Support Specialist, CSS<sup>®</sup>

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



1. Tenancy and the Law
2. The Basics of Fair Housing
3. Ethnics
4. Lead-Based Renovation, Repair, and Paint
5. Maintenance Basics

#### **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 1,600 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 Housing 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:

1. Anti-Discrimination
2. Landlord-Tenant
3. Training and Technical Assistance
4. Enforcement of Housing Rights
5. Administrative Hearings for the Riverside County Housing Authority
6. Special Projects

## **2. California Department of Civil Rights (DCR)**

The mission of the Department of Civil Rights (DCR) is to protect Californians from employment, housing and public accommodation discrimination, state funded programs and activities, professional relationships, hate violence and human trafficking. To achieve this mission, DCR keeps track of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence.

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 DCR 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, DCR'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, DCR will close the case. If investigative findings show a violation of law, the DCR schedules a formal conciliation conference. During the conciliation conference, the DCR presents information supporting its belief that there has been a violation and explores options to resolve the complaint. If formal conciliation fails, the DCR Housing Administrator may recommend litigation. If litigation is required, the case may be heard before the DCR or in civil court. Potential remedies for cases settled by the DCR 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 DCR remedies with one exception; instead of civil penalties, a court may award unlimited punitive damages.

## **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 DCR, which has 30 days to address the complaint. As a substantially equivalent agency, DCR's findings are usually accepted by HUD. Thereafter, HUD tracks the complaint and its issues and outcomes as a “dually filed” complaint.

**Fair Housing Complaints**

HUD maintains records of complaints that represent potential and actual violations of federal housing law. Over the 2018 through 2024 study period, HUD received 6 complaints alleging discrimination in Riverside County. Three of these complaints were on the basis of sex, two for race, two for retaliation, one for familial status, and one for disability. One of these cases was reported in 2020, two were reported in 2021, and three were reported in 2023. There were no fair housing complaints received in 2018, 2019, 2022. There have been no reported Fair Housing complaints in 2024 at the time of this report.

**Table 25. Fair Housing Complaints by Basis**

Fair Housing Complaints by Basis Riverside County HUD Fair Housing Complaints									
Basis	2018	2019	2020	2021	2022	2023	2024	Total	Percentage
Race	0	0	1	0	0	1	0	2	22.2%
Sex	0	0	0	2	0	1	0	3	66.7%
Disability	0	0	0	0	0	0	0	0	0%
Religion	0	0	0	0	0	0	0	0	0%
Familial Status	0	0	0	1	0	0	0	1	11.1%
Disability	0	0	0	0	0	1	0	1	11.1%
Retaliation	0	0	1	1	0	0	0	2	22.2%
<b>Total Basis</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>4</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>9</b>	<b>100%</b>
<b>Total Complaints</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>6</b>	

There were six total Fair Housing Complaints between 2018 and 2024 and all of them were successfully closed. Two of these complaints were successfully conciliated or settled, and the remaining four had no caused determination.



**Table 26. Fair Housing Complaints by Closure Status**

Fair Housing Complaints by Closure Riverside County HUD Fair Housing Complaints									
Basis	2018	2019	2020	2021	2022	2023	2024	Total	Percentage
Unable to locate complainant	0	0	0	0	0	0	0	0	0%
Complainant failed to cooperate	0	0	0	0	0	0	0	0	0%
No cause determination	0	0	1	0	0	1	2	4	66.7%
Complaint withdrawn by complainant after resolution	0	0	0	0	0	0	0	0	0%
Conciliation/Settlement successful	0	0	0	0	2	0	0	2	33.3%
Complaint withdrawn by complainant without resolution	0	0	0	0	0	0	0	0	0%
<b>Total Closures</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>6</b>	<b>100%</b>
<b>Total Complaints</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>6</b>	

Fair Housing complaints often include more than one issue. Fair housing complaints from Riverside County cited 11 issues total, with the most common being discriminatory terms, conditions, privilege or services and facilities, as well as discriminatory acts under Section 818 (coercion, etc.). This was followed by both the discriminatory refusal to rent, and discriminatory advertising, statements and notices. Discrimination in terms, conditions, and privileges relating to rental received one issue.



**Table 27. Fair Housing Complaints by Issue**

Fair Housing Complaints by Issue Riverside County HUD Fair Housing Complaints									
Issue	2018	2019	2020	2021	2022	2023	2024	Total	Percentage
Discriminatory refusal to rent, False denial or representation of availability - rental	0	0	0	0	0	0	0	0	0%
Discriminatory terms, conditions, privilege or services and facilities	0	0	0	1	0	2	0	3	27.2%
Discriminatory financing (includes real estate transactions)	0	0	0	0	0	0	0	0	0%
Failure to make reasonable accommodation	0	0	0	0	0	0	0	0	0%
Discriminatory advertising, statements and notices	0	0	1	1	0	0	0	2	18.2%
Discrimination in terms/conditions/privileges relating to rental	0	0	0	1	0	0	0	1	9.0%
Discriminatory refusal to rent	0	0	1	0	0	1	0	2	18.2%
None	0	0	0	0	0	0	0	0	0%
Discriminatory acts under Section 818 (coercion, etc.)	0	0	0	2	0	1	0	3	27.2%
Failure to permit reasonable modification	0	0	0	0	0	0	0	0	0%
Otherwise deny or make housing unavailable	0	0	0	0	0	0	0	0	0%
Discrimination in the terms/conditions for making loans	0	0	0	0	0	0	0	0	0%
<b>Total Issues</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>5</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>11</b>	<b>100%</b>
<b>Total Complaints</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>6</b>	





## 4. Hate Crimes

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

To a certain degree, hate crimes are an indicator of the environmental context of discrimination. These crimes should be reported to the Police or Sheriff's department. On the other hand, a hate incident is an action or behavior that is motivated by hate but is protected by the First Amendment right to freedom of expression. Examples of hate incidents can include name calling, epithets, distribution of hate material in public places, and the display of offensive hate-motivated material on one's property. The freedom guaranteed by the U.S. Constitution, such as the freedom of speech, allows hateful rhetoric as long as it does not interfere with the civil rights of others. Only when these incidents escalate can they be considered an actual crime.



## VI. Progress Since Last AI

The 2019 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

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 narrowed, 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)

➔ *OUTCOME: The City has funded the Rehabilitation and Senior Repair Program since the last AI.*

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

➔ *OUTCOME: Habitat for Humanity Inland Empire has begun a financial literacy training.*

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

➔ *OUTCOME: Habitat for Humanity Inland Empire has begun a homebuyer education course.*

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



➔ *OUTCOME: More progress is needed here.*

## 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:

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

➔ *OUTCOME: Items a through d are carried out by the Fair Housing Council, which received funding from the city. The City activity distributes literature on Fair Housing rights and provides representation at 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)

➔ *OUTCOME: The City of Perris continues to provide information to individuals seeking resources about Riverside County Housing Authority programs, such as the Housing Choice Voucher (Section 8) Program. Informational brochures with the Riverside County program and contact information are available on the City of Perris Housing Authority webpage and at the City of*



*Perris public counters.*

### **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)

➔ *OUTCOME: These efforts are ongoing. See updates to the Housing Element posted on the City website.*

### **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.

#### **Recommendation:**

**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)

➔ *OUTCOME: The City provides all notices in English and Spanish and notices are published in La Opinion, the Spanish language newspaper as well as on the City website.. Interpretation services, assisted listening devices, and agendas in alternative formats can be made available upon request for City Council Meetings. All housing event flyers and social media posts are done in English and Spanish.*

### **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 current 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.”

- 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 Accessory Dwelling Units (ADUs).

**Recommendation:**

**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

➔ *OUTCOME: The City of Perris is processing a comprehensive update of the Zoning Code and Specific Plan and the definition for “family” will be revised for compliance with fair housing laws, including recent updates to state law. The Zoning Code Amendment and Specific Plan Amendments are tentatively scheduled to be considered by the City Council in October 2024.*

## 6. Discriminatory Language in Real Estate Advertising

A review of advertisements for rental units and homes for sale was conducted as part of this AI 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.

**Recommendation:**

**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)

➔ *OUTCOME: The City works with the Fair Housing Council to support outreach, engagement, and provision of fair housing enforcement efforts. The City will be updating its website and will continue to provide education opportunities to the community.*

## B. New Impediments Identified As of Last Plan 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.

**Recommendation:**

**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)

➔ *OUTCOME: The City is supporting the development of a skills center. This is an ongoing action.*



## 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 2024-2029 planning period.

### 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:

- Comparatively, Hispanic households have limited access to homeownership opportunities due to their generally lower incomes and continue to have higher denial rates than non-hispanic applicants. However, overall, mixed race and American Indian/Native Alaskans had the lowest approval rates.

#### Proposed Action:

**Action 1:** In conjunction with Habitat for Humanity Inland Empire, provide workshops for on financial literacy. (Annually)

**Action 2:** In conjunction with the Habitat for Humanity Inland Empire, 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)

### 2. Housing Discrimination

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

- Complaints filed with the U.S. Department of Housing and Urban Development showed an increase of sex as the basis of perceived discrimination.
- Input from fair housing service providers and participants at the Stakeholder Meeting, housing discrimination/harassment against seniors has increased while the city's population over 55 has grown by over 16% since 2015.

#### Proposed Action:

**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 FY 2024 – FY 2028 Consolidated Plan.





**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, 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. Between 2010 and 2020, the City's population grew by 15%, a rate higher than Riverside County's growth of around 10.5 percent and more than double California's growth statewide. As the city's population continues to grow, there will be a need for additional affordable housing and an increased strain on the housing stock in Perris.

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.

#### Proposed Action:

**Action 6:** 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

About 72% of the City's population is Hispanic with nearly 30,000 of those residents indicating that they primarily speak Spanish at home. Of those Spanish speaking residents, 34.5% indicated they speak English less than very well. Approximately 1,600 asian residents indicated that they primarily speak a language other than English at home and 51% of those residents speak English less than very well. For those with limited English proficiency, their ability to participate in the local government's decision-making process relating to housing matters may be limited without concerted efforts to facilitated their engagement.

#### Proposed Action:

**Action 7:** 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 City is processing a comprehensive



update of the Zoning Code and Specific Plan for compliance with fair housing laws, including recent updates to state law. The Zoning Code Amendment and Specific Plan Amendments are tentatively scheduled to be considered by the City Council in October 2024.

#### **Proposed Action:**

**Action 8:** Implement changes to the zoning code and provide education to the community on the changes. Update educational materials that may be affected by zoning code changes.

## **6. Fair Housing Education**

Fair Housing Education is an ongoing need. With recent and upcoming State law changes, updates to education and increased outreach is needed to ensure residents and property owners under the law. Further,

#### **Proposed Action:**

**Action 9:** 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 10:** Continue fair housing outreach in the form of information distribution, pop up events and quarterly forums. (Ongoing)

**Action 11:** Support efforts of the Fair Housing Council of Riverside County to monitor for fair housing compliance. (Ongoing)

## **7. Economic 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.

#### **Proposed Action:**

**Action 12:** The City will continue to pursue and expand economic development opportunities that would benefit all residents, but especially lower income residents and launch the Perris Downtown Skills Training and Job Placement Center facility in 2024. Job training and employment placement and support services will 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)