



City of
JURUPA VALLEY
California

*Analysis of Impediments to
Fair Housing Choice 2019-2023*

Final - December 5, 2019

**City of Jurupa Valley
City Manager's Office
8930 Limonite Avenue
Jurupa Valley, CA 92509**

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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 recognizing 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 presents a demographic profile of the City of Jurupa Valley, assesses the extent of housing needs among specific income groups and evaluates the availability of a range of housing choices for residents. This report also analyzes the conditions in the private market and the public sector that could limit the range of housing choices or impede a person's access to housing. As the name of the report suggests, the document reviews "impediments" to fair housing. Although this report also assesses the nature and extent of housing discrimination, it primarily focuses on identifying impediments that could prevent equal housing access and developing solutions to mitigate or remove such impediments.

Fair Housing

Federal fair housing laws prohibit discrimination in the sale, rental or lease of housing, and in negotiations for real property, based on race, color, religion, sex, national origin, familial status and disability. California fair housing laws build on the federal laws, including age, marital status, ancestry, source of income, sexual orientation, and "any arbitrary discrimination" as the protected categories under the laws. The following definition is used for this report:

"Fair housing describes a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor."

Fair Housing Legal Framework

The federal Fair Housing Act of 1968 and the Fair Housing Amendments Act of 1988 (42 U.S. Code §§ 3601-3619, 3631) are federal fair housing laws that prohibit discrimination in all aspects of housing, such as the sale, rental, lease or negotiation for real property. The Fair Housing Act prohibits discrimination based on race, color, religion, sex and national origin.

In 1988, the Fair Housing Act was amended to extend protection to familial status and people with disabilities (mental or physical). In addition, the Amendments Act provides for "reasonable



accommodations,” allowing structural modifications for persons with disabilities, if requested, at their own expense, for all dwellings to accommodate the physically disabled.

The California Department of Fair Employment and Housing (DFEH) enforces California laws that provide protection and monetary relief to victims of unlawful housing practices. The Fair Employment and Housing Act (FEHA; Part 2.8 of the California Government Code, Code Sections 12900-12996) prohibit discrimination and harassment in housing practices.

The Unruh Act (California Government Code Section 51) protects Californians from discrimination in public accommodations and requires equal access to the accommodations. The Unruh Act provides broad protection and has been held by the courts to prohibit any arbitrary discrimination on the basis of personal characteristics or traits, and applies to a range of types of housing.

The Ralph Civil Rights Act (California Civil Code Section 51.7) prohibits violence and threats of violence and specifies that housing situations are protected under this Act, which includes houses, apartments, hotels, boarding housing and condominiums. Violators of the Ralph Act can be sued for actual or emotional damages, in addition to civil penalties.

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.

In addition to these acts, California Government Code Sections 111135, 65008 and 65589.5 prohibit discrimination in programs funded by the state and in any land-use decisions.¹

Housing Issues, Affordability and Fair Housing

The U.S. Department of Housing and Urban Development (HUD) Fair Housing and Equal Opportunity Division distinguishes 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 treatment would fair housing concerns arise.

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

¹*Fair Housing Hotline Project, Legal Services of Northern California. (March 2004). “Fair Housing in California: Families with Children: A Manual for Housing Providers, Tenants and Advocates.”*



What Is an Impediment to Fair Housing Choice?

According to HUD's *Fair Housing Planning Guide*, and based within the legal framework of federal and state laws, impediments to fair housing choice are:

- Any actions, omissions or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation or any other arbitrary factor that restricts housing choices or the availability of housing choices, or
- Any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, age, marital status, familial status, source of income, sexual orientation or any other arbitrary factor.

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

- Certify its commitment to actively further fair housing choice.
- Maintain fair housing records.
- Conduct an Analysis of Impediments to Fair Housing Choice.

Purpose of Report

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

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

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



Organization of Report

The AI is divided into six sections:

Section 1: Introduction defines fair housing and explains the purpose of this report.

Section 2: Jurupa Valley Profile presents the demographic, housing and income characteristics in Jurupa Valley. Major employers and transportation access to job centers are identified. The relationships among these variables are discussed.

Section 3: Mortgage Lending Practices analyzes private activities that could impede fair housing choices in Jurupa Valley.

Section 4: Public Policies and Practices evaluate various public policies and actions that could impede fair housing choices in Jurupa Valley.

Section 5: Fair Housing Practices evaluates the fair housing services available to residents and identifies fair housing complaints and violations in Jurupa Valley.

Section 6: Progress Since 2014 summarizes private and public sector impediments identified in the prior regional AI and the progress in implementing actions to address these impediments.

Section 7: Conclusions and Recommendations provide conclusions and recommendations about fair housing issues in Jurupa Valley.

At the end of this report, a page is attached that includes the endorsement of the City Manager and a statement certifying that the AI represents Jurupa Valley's official conclusions regarding impediments to fair housing choice and the actions necessary to address these impediments.

Reporting Staff and Data Sources

This report, prepared through a collaborative effort between the City staff and GRC Associates, Inc., under contract to the City of Jurupa Valley, is funded through Community Development Block Grant (CDBG) funds.

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

- City of Jurupa Valley 2018-2022 Consolidated Plan
- City of Jurupa Valley General Plan (adopted September 7, 2017)



- City of Jurupa Valley Final Housing Element of the General Plan, submitted to California Department of Housing and Community Development (HCD) on April 3, 2019, and approved on June 4, 2019. This Housing Element was prepared to meet the State of California's 5th Cycle Housing Element Update Planning Period from October 15, 2013 to October 15, 2021.
- HUD FY 2018 and 2019 Fair Market Rents & Section 8 Limits
- Riverside County Analysis of Impediments to Fair Housing Choice 2014
- Riverside Transit Agency (RTA) - 2019
- Southern California Association of Governments (SCAG) 2012-2035 Regional Growth Forecast
- SCAG 2019 Local Profiles
- SCAG Regional Housing Needs Assessment (RHNA 5th Cycle, 2014-2021)
- California Department of Finance Population and Housing Estimates (2019)
- U.S. Census Bureau, 2000 and 2010
- U.S. Census Bureau American Community Survey (2013-2017)
- U.S. Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy Data (CHAS) 2015
- California Employment Development Department (2007 - 2019)
- Home Mortgage Disclosure Act (2019)
- California Department of Social Services Community Care Licensing Division (2019)

Public Participation

This AI has been developed to provide an overview of laws, regulations, conditions or other possible obstacles that could 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 that the report responds to community needs, the development of the AI includes a community outreach program consisting of community meetings, an on-line survey, service provider interviews and City Council public hearing.

Community Meetings

Residents, businesses, and public and private agencies were invited to participate in the discussion of fair housing issues in Jurupa Valley. Two community meetings were conducted on the following dates and locations:

- **Sept. 10, 2019** — Jurupa Valley City Hall, 8930 Limonite Ave., 3:00 p.m.
- **Sept. 17, 2019** — Jurupa Valley City Hall, 8930 Limonite Ave., 6:00 p.m.



The meetings provided opportunities for Jurupa Valley residents to gain awareness of fair housing laws, and for residents and service agencies to share fair housing issues and concerns. To ensure that the fair housing concerns of low- and moderate-income and special needs residents were addressed, individual invitation letters were distributed via mail and email, if available, to agencies and organizations that serve the low- and moderate-income and special needs community. In addition, community meeting notices were posted on the City's website at www.jurupavalley.org, other places, such as City's Facebook page and notices of meetings were posted conspicuously at City Hall and two libraries. As a result of an extensive outreach effort, attendance at the public meetings included several service providers, in addition to residents.

Community Fair Housing Survey

To supplement the community meetings and to assist in further understanding the fair housing issues in the City, a Fair Housing Survey was made available to Jurupa Valley residents at City Hall and online via the City's website. In addition, surveys were available at strategic locations throughout the City by staff. Spanish versions of the survey were provided to reflect the diversity of Jurupa Valley's residents. During the August 7, 2019 to September 18, 2019 survey period, surveys were completed online or hardcopies were submitted by Jurupa Valley residents.

The survey consisted of questions designed to gather information on a person's experience with fair housing issues and perception of fair housing issues in his/her neighborhood. A copy of the survey and a summary of the results are included in **Appendix A**.

Service Provider Meetings

In addition, the City met with various non-profit and housing organizations, including the Fair Housing Council of Riverside County, Path of Life Ministries Homeless Services and others to provide and receive information on the development of the AI. Input from the various organizations provided in-depth context and insight into housing conditions and fair housing issues for residents in Jurupa Valley.

Public Review

During a 30-day public review period (November 6, 2019 to December 5, 2019), the draft AI document was made available at the following locations:

- Jurupa Valley City Hall / City Clerk, 8930 Limonite Ave., Jurupa Valley, CA 92509
- The Jurupa Valley Libraries (Louis Rubidoux and Glen Avon):
 - Louis Rubidoux: 5840 Mission Blvd.,
 - Glen Avon: 9244 Galena St.
- Jurupa Valley City website (www.jurupavalley.org)



Notice of public review was published in the Press Enterprise, the newspaper serving Jurupa Valley residents and posted conspicuously at City Hall and two libraries, and also the City's website. There were no written comments received from the public during the 30-day, public review period from November 6, 2019 to December 5, 2019.

Public Hearing

A public hearing before the Jurupa Valley City Council will be held on December 5, 2019 to accept community input on the Analysis of Impediments to Fair Housing Choice 2019-2023, before the City Council considered approval of the documents. There were no comments from the public and subsequently, the City Council voted 5-0 to accept the AI. **(See Appendix B.)**

Key Issues Identified

Key issues identified from public outreach efforts, including the resident survey, advisory meetings and interviews with service providers offered insight into the following issues and recent trends related to fair housing in the City of Jurupa Valley:

- Fair Housing Council of Riverside County (FHCR), which is Jurupa Valley's fair housing outreach provider, stated that they receive the most complaints from disabled people-regarding housing discrimination.
- At the outreach meetings, there were no residents that attended that had filed a case against housing discrimination. There was one person attending the community outreach meetings that suspected he may have been discriminated upon when trying to rent an apartment unit because of his accent.
- Issues were also brought up regarding seniors and others being priced out of their housing units.
- The discriminatory practice of redlining was also noted for not being an issue in Jurupa Valley.
- There were 52 surveys that were completed. All surveys submitted were in English. Most surveys were completed by property owners (78.9%) and females (78.9%). Regarding racial composition, surveys submitted by race were White (75%), Black (3.9%), Asian (3.9%) and American Indian/Alaska Native (3.9%). Hispanics, categorized as an ethnicity by the US Census Bureau were 31.8% of respondents. Approximately 19% of people responding to the surveys said they encountered housing discrimination. Most of these respondents said the type of discrimination they faced was being refused, discouraged, or charged more to buy or rent a housing unit. Out of the 14 respondents that said they faced housing discrimination, three said areas of Jurupa Valley, the rest were in other cities. There was not a concentration of housing discrimination cases in any specific area. The most common response to the question of what can be done to prevent housing discrimination was for the City to provide more education, raise awareness of issue and provide tools for residents to use, in case they encountered discrimination. Housing survey results are in **Appendix A.**



2. Jurupa Valley Profile

This chapter provides demographic, socioeconomic and housing profiles of the City of Jurupa Valley. It highlights recent demographic and socioeconomic trends, assesses the extent of housing needs and availability among specific income groups and persons with special needs, and identifies major employers, available public transit services, public housing, and community care facilities. The data-based analysis of the City is integral in evaluating housing demands and potential fair housing issues for the City.

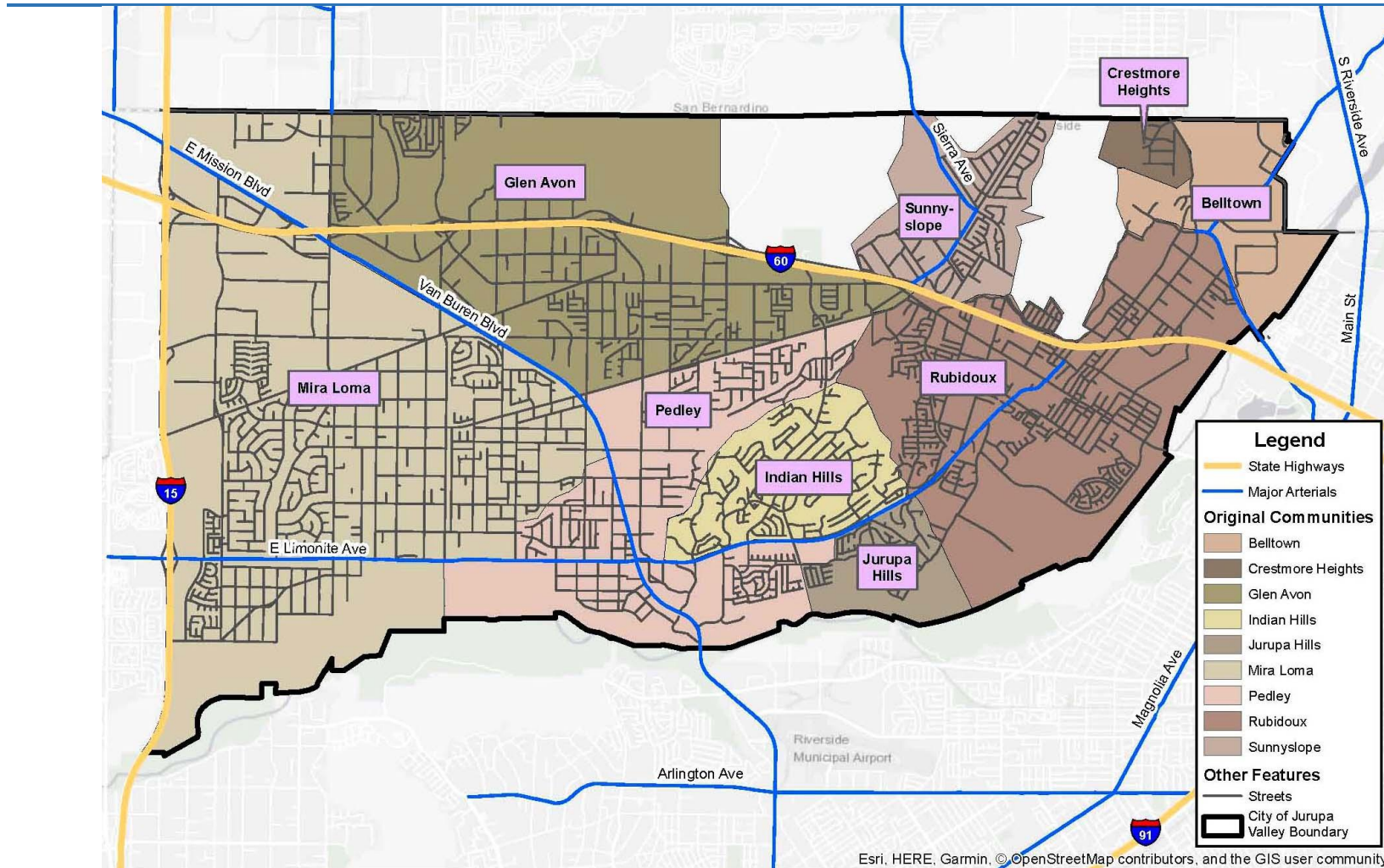
The City of Jurupa Valley was incorporated on July 1, 2011, making it the newest city in California. As such, Jurupa Valley was not identified as a city in the 2010 decennial census. Key data sources for the chapter include: U.S. Census Bureau American Community Survey (ACS), California Department of Finance (DOF), California Department of Social Services Community Care Licensing Division, Southern California Association of Governments (SCAG), California Employment Development Department (EDD), and information provided in the 2018 City of Jurupa Valley Five-Year Consolidated Plan (ConPlan). Other sources are identified in this AI chapter.

Population Profile

Population Growth

The City of Jurupa Valley, known as the “A Community of Communities,” covers 44-square miles in northwest Riverside County and encompasses the communities of Jurupa Hills, Mira Loma, Glen Avon, Pedley, Indian Hills, Belltown, Sunnyslope, Crestmore Heights, and Rubidoux. A map of the City and its nine communities are shown on **Figure 2-1**

The City of Jurupa Valley has a 2019 population of 106,318 residents. Although the City was not incorporated until 2011, by aggregating 2000 and 2010 U.S. Census Block Group data within the boundaries of the City, the population grew by 3.9 percent since 2000. This compares to Riverside County’s robust growth of 56.5 percent over the same 19-year period. The level of population growth experience in the City is presented in **Figure 2-2**. According to the SCAG Regional Growth Forecast, the City is forecast to increase to approximately 126,000 residents by 2035, an increase of 18.5 percent from 2019.



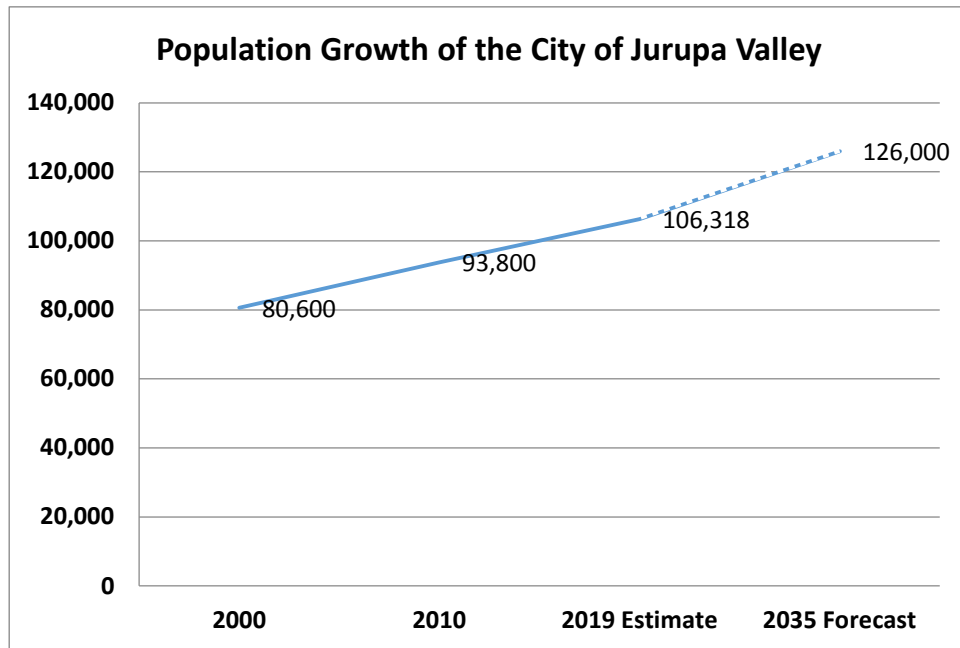
Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community



Figure 2-1
City of Jurupa Valley and Communities



Figure 2-2



Source: U.S. Census, DOF E-5 2019 Estimates, SCAG 2012-2035 Regional Growth Forecast

Age Composition

An analysis of the age distribution is important because it affects the future need for jobs, housing and social services. **Table 2-1** details the age distribution of the Jurupa Valley’s 2017 population. The age groups are designated as follows: Under 5 years (young children), 5-17 years (minors), 18-34 (young adults), 35-54 (middle-age adults), 55-64 (future elderly), 65-74 (elderly), and 75 years and older (frail elderly). These age divisions are intended to give an overview of the distinctive housing and social service needs.

According to **Table 2-1**, over one-half (54.5%) of the City’s total population was under the age of 35 years in 2017. This age group typically consists of young children, students, recent graduates, or adults just entering the job market, which indicates that future planning may need to include additional schools, entry-level jobs, and starter homes. This age group is important because the City has a younger overall population (median age of 31.7 years) as compared to the County (median age of 35.0 years). This indicates that the provision of smaller, affordable housing opportunities, particularly in the rental market, is needed in the near future to allow this cohort to remain in the community. Residents ages 35 to 64 years tend to drive the market demand for moderate to relatively high cost condominiums and single-family homes. People over 65 years of age, which accounted for 9.4 percent of the City’s total population, tend to generate demand for low- to moderate-cost apartments, condominiums, group quarters, and mobile homes. Senior residents may also balance their housing options with the proximity to social services.



**Table 2-1
Age Distribution and Median Age, 2017**

Age Group	Jurupa Valley		Riverside County	
	Number	% of Total	Number	% of Total
Under 5	7,420	7.3%	157,698	6.7%
5 to 17	21,022	20.6%	456,023	19.4%
18 to 34	27,176	26.6%	562,903	23.9%
35 to 54	25,829	25.3%	603,793	25.6%
55 to 64	11,202	11.0%	257,606	10.9%
65 to 74	5,713	5.6%	179,743	7.6%
77 and Over	3,840	3.8%	137,236	5.8%
TOTAL	102,202	100.0%	2,355,002	100.0%
Median Age	31.7 years		35.0 years	
Dependency Ratio	0.59		0.65	

Source: ACS 2013-2017

Another way to analyze the age group as is through the dependency ratio, which is the ratio of the population under 18 and over 65 years of age to the population 18 to 64 years. This ratio is an indicator of the reliance of children and senior citizens on the working age population. The range of the dependency ratio is measured from 0.0 (low) to 1.00 (high); the lower the dependency ratio, the lesser the “burden” is on a community’s working age residents. The dependency ratio is an important indication of the demand for social services and senior housing. According to **Table 2-1**, the dependency ratio in 2017 was 0.59 in Jurupa Valley, and 0.65 in Riverside County. The County overall had a notably higher dependency ratio than Jurupa Valley.

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



Race and Ethnicity

The race and ethnic composition of a population influence fair housing issues to the extent that certain racial and ethnic groups may experience discrimination. These influences are due to factors such as color, language spoken, or other cultural factors.

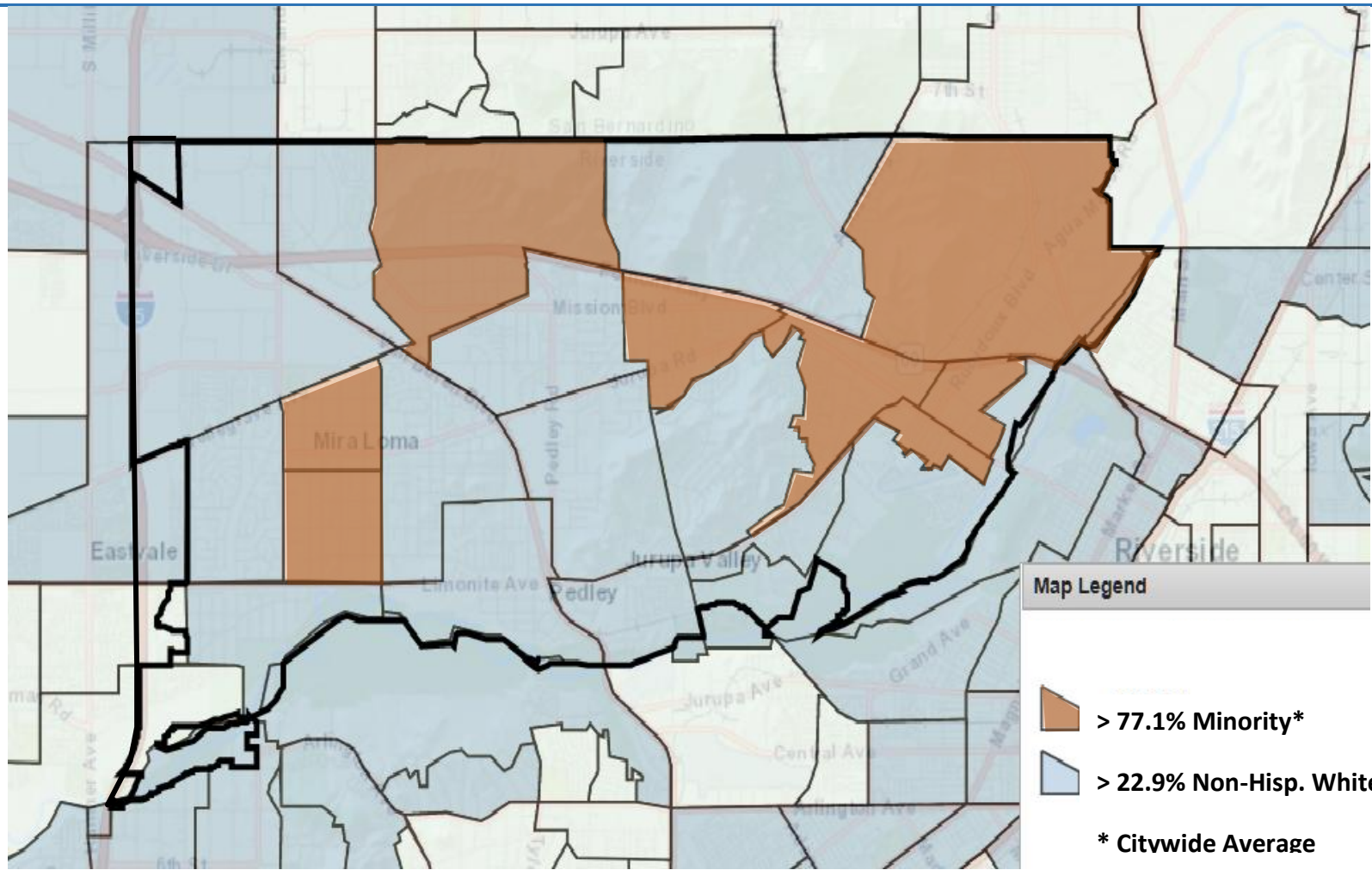
Table 2-2 presents the racial/ethnic breakdown of Jurupa Valley and Riverside County residents in 2017. According to the table, the Hispanic population represented the largest share of the City’s racial/ethnic population at 69.6 percent, which was higher than the countywide share of 48.0 percent. The second largest racial/ethnic group in Jurupa Valley was non-Hispanic White at 22.9 percent, followed by non-Hispanic Black/African-American at 3.0 percent and non-Hispanic Asian/Pacific Islander at 2.8 percent. In comparison, the proportion of the City’s non-Hispanic White was lower than the Riverside County (22.9% vs. 36.6%, respectively).

The racial and ethnic distribution of Jurupa Valley’s population appears diverse with over three-quarters (77.1%) of the total population composed of Hispanic, non-Hispanic Black/African American, non-Hispanic Asian/Pacific, non-Hispanic American Indian/Alaskan Natives, and others. However, within the City there are areas of racial/ethnic concentrations. To illustrate areas of minority concentration, census tracts that exceeded the City’s minority population average of 77.1 percent were highlighted in **Figure 2-3**.

Table 2-2
Jurupa Valley Racial/Ethnicity 2017

Tenure	Jurupa Valley		Riverside County	
	Occupied Units	% of Total	Occupied Units	% of Total
Hispanic	71,167	69.6%	1,130,033	48.0%
NH White	23,405	22.9%	861,271	36.6%
NH Black	3,087	3.0%	140,810	6.0%
NH Asian/Pacific Islander	2,817	2.8%	149,881	6.4%
NH American Ind./Alaskan Natives	258	0.3%	9,584	0.4%
Other/Multiracial	1,468	1.4%	63,423	2.7%
Total Population	102,202	100.0%	2,355,002	100.0%

Source: ACS 2013-2017



Source: HUD CPD Mapping, Census Bureau ACS 2013-2017

Figure 2-3
Racial/Ethnic Minority Concentration by Census Tracts



Linguistic Isolation

Language barriers can serve as an impediment to fair housing accessibility. Residents who lack proficiency with the English language may have difficulties accessing services and information pertaining to fair housing, or may be obstructed by reluctance on the part of landlords to rent units to non-English speaking tenants. Another fair housing concern could arise if foreign-born owners of rental housing advertise only in their native languages, thus restricting choice in the renter market. Limited English proficiency may also hinder access to social services, or affect a resident's employment opportunities and educational attainment.

Table 2-3 details the percent of total households in 2017 that were considered to be limited English-speaking households. The Census defines a limited speaking household as a household "in which no member 14 years old and over: 1) speaks only English; or 2) speaks a non-English language and speaks English 'very well.'" In other words, all household members 14 and older have at least some difficulty with English proficiency. According to **Table 2-3**, the majority (52.4%) of Jurupa Valley households spoke Spanish as their primary language. Countywide, Spanish was the primary language of about one-third (31.8%) of the households. The table also lists the prevalence of limited English proficiency among households whose primary spoken language is not English. For example, among all Jurupa Valley households whose primary spoken language is Spanish, 16.1 percent were considered to be limited English-speaking households. While only 2.4 percent of Jurupa Valley households spoke Asian/Pacific Islander languages as their primary language, this group displayed the largest degree of linguistic isolation at 21.4 percent.

Table 2-3
Households by Primary Language Spoken, 2017

	Jurupa Valley		Riverside County	
	HHs	% of Total	HHs	% of Total
Total Households	25,170		711,724	
Primary Language Spoken				
Spanish	13,191	52.4%	226,547	31.8%
Other Indo-European Language	378	1.5%	21,050	3.0%
Asian/Pac. Islander Language	616	2.4%	34,286	4.8%
Other Language	55	0.2%	5,905	0.8%
Limited English-Speaking HHs				
Total HH w/ Limited-English	2,332	9.3%	51,957	7.3%
Spanish	2,130	16.1%	42,035	18.6%
Other Indo-European Language	70	18.5%	2,143	10.2%
Asian/Pac. Islander Language	132	21.4%	4,075	20.6%
Other Language	0	0.0%	704	11.9%

Source: ACS 2013-2017 (S1602)



Household Characteristics

Household Tenure

Table 2-4 shows that in 2017, there were 25,170 total occupied housing units or households in Jurupa Valley, and of this total, about two-third (65.8%) were owner households and one-third (34.2%) were renter households. This compares very closely with the County's proportion of owner and renter households (65.0% and 35.0%, respectively).

Table 2-4
Jurupa Valley Household Tenure

Tenure	Jurupa Valley		Riverside County	
	Occupied Units	% of Total	Occupied Units	% of Total
Owner	16,560	65.8%	462,788	65.0%
Renter	8,610	34.2%	248,936	35.0%
TOTAL	25,170	100.0%	711,724	100.0%

Source: ACS 2013-2017 (B25010)

Household Income

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities. Although economic factors that affect a household's housing choice are not a fair housing issue per se, the relationships among household income, household type, race/ethnicity and other factors often create misconceptions and biases that raise fair housing issues.

Most state and federal housing programs are benchmarked to specific income limits. Consistent with federal regulations, income categories defined by HUD are: Extremely Low income (0-30% of Area Mean Income); Low income (31-50% of AMI); Moderate income (51-80% of AMI); and Above Moderate income (Greater than 80% of AMI). Federal housing programs are not eligible to households earning greater than 80 percent of the AMI. **Table 2-5** presents HUD and State income limits by income group for Riverside County.

The State of California also provides income limits that are annually updated in accordance with procedures established by HUD at the federal level. The State income limits apply to designated programs and are used to determine applicant eligibility and to calculate affordable housing costs for applicable housing assistance programs.



Table 2-5
2019 HUD and State Income Limits for Riverside County

Income Group	Percent AMI	2019 Income Limit for a 4-Person HH
HUD-		
Extremely Low	≤ 30%	\$25,750
Low	31% - 50%	\$35,900
Moderate	51%-80%	\$57,450
Above Moderate	>80%	\$57,450 +
State		
Extremely Low	≤ 30%	\$25,750
Very Low	31% - 50%	\$35,900
Low	51%-80%	\$57,450
Moderate	81% - 120%	\$83,650
Above Moderate	> 120%	--

Source: HUD and State HCD, Income Limits 2019
 Based on \$69,700 AMI for a four-person household

Table 2-6 shows that in 2017 the median household income of Jurupa Valley (\$63,286) was higher than the countywide household income (\$60,807). Based on income grouping, 39.1 percent of Jurupa Valley households made less than \$50,000 annually, 35.9 percent made \$50,000 to \$99,999, and the remaining 25.0 percent made more than \$100,000 annually. The table also shows that 10.5 percent of all Jurupa Valley family households had incomes in the past 12 months below the federal poverty level.

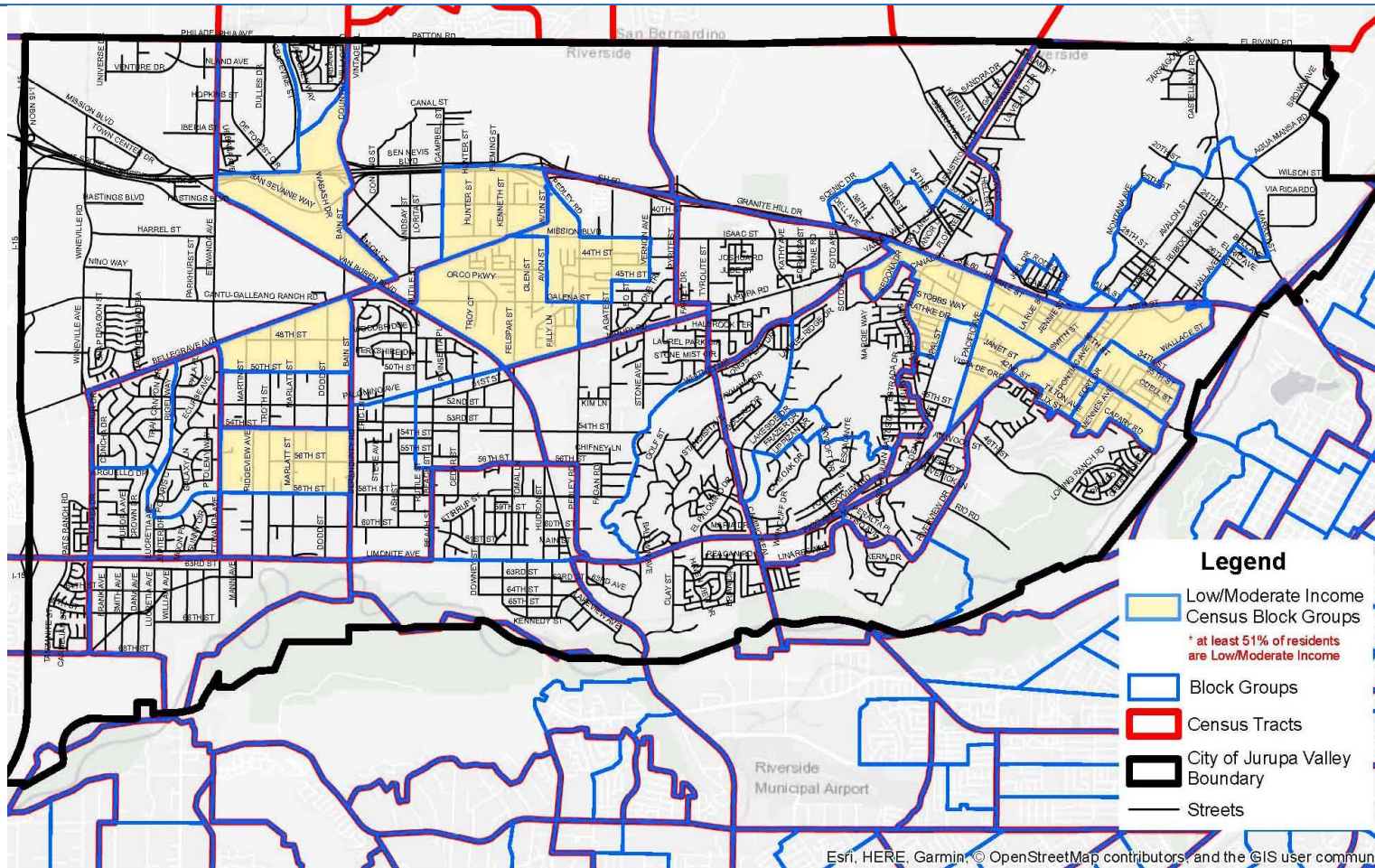
Figure 2-4 identifies the Low- and Moderate-income areas in the City of Jurupa Valley by Census Block Group. A Low- to Moderate-income area is defined as a Census Block Group with 51 percent or more Low- and Moderate-income persons. These are the area where CDBG funds can be utilized to provide public service and capital improvement projects. **Figure 2-5** shows the Census Block Groups where the family household incomes were below the citywide average of families below the federal poverty level.



**Table 2-6
Household Income, 2017**

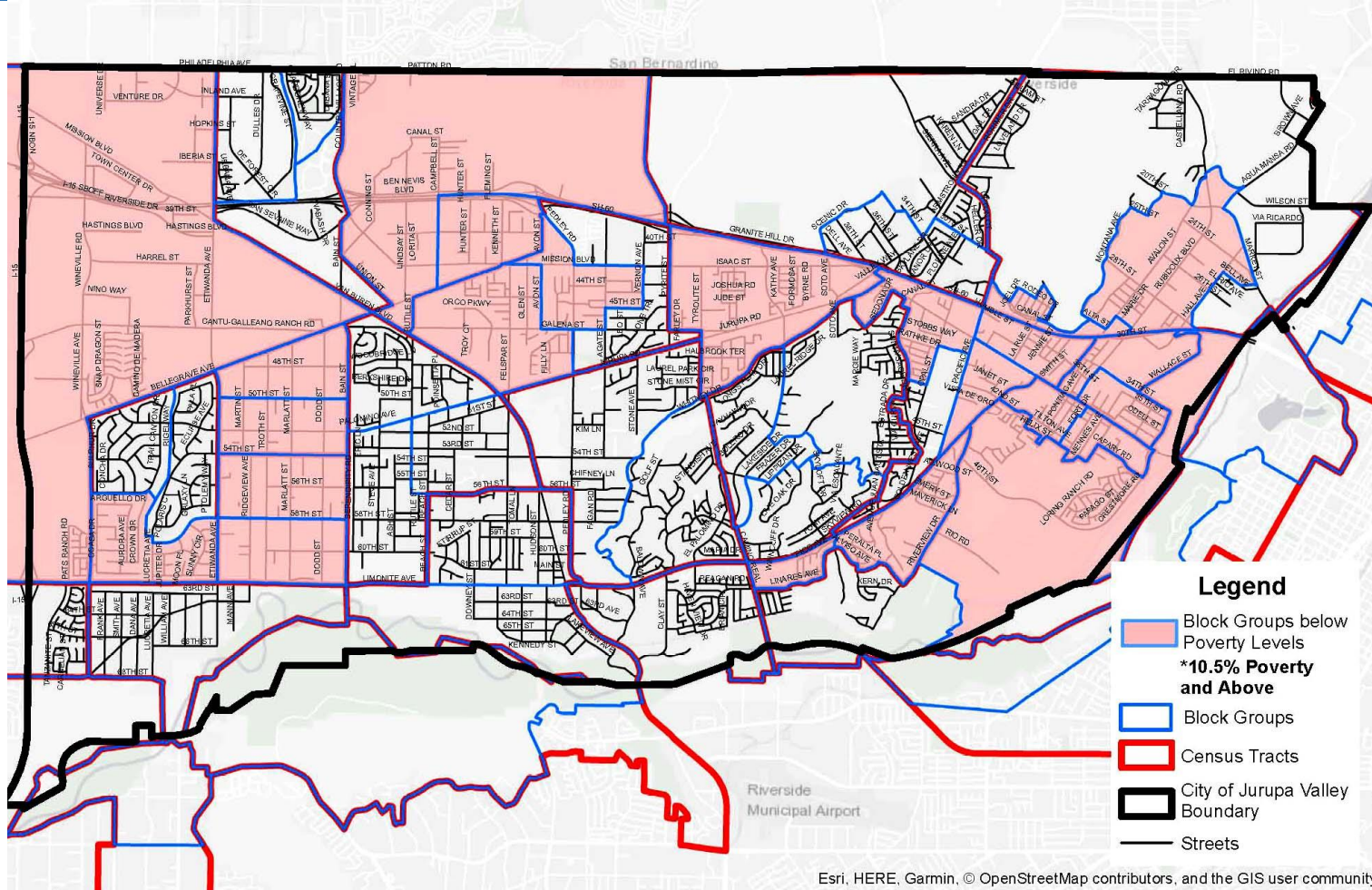
Income	Jurupa Valley		Riverside County	
	HHs	% of Total	HHs	% of Total
Less than \$10,000	1,013	4.0%	40,131	5.6%
\$10,000 - \$14,999	1,084	4.3%	32,340	4.5%
\$15,000 - \$24,999	2,412	9.6%	66,947	9.4%
\$25,000 - \$34,999	2,228	8.9%	67,129	9.4%
\$35,000 - \$49,999	3,103	12.3%	90,977	12.8%
\$50,000 - \$74,999	5,148	20.5%	126,753	17.8%
\$75,000 - \$99,999	3,879	15.4%	92,303	13.0%
\$100,000 - \$149,999	4,038	16.0%	110,785	15.6%
\$150,000 - \$199,999	1,319	5.2%	46,395	6.5%
\$200,000 or more	946	3.8%	37,964	5.3%
Total	24,170	100.0%	711,724	100.0%
Median HH Income	\$63,286		\$60,807	
Families HH in Past 12 Months Below Poverty Level	10.5%		8.8%	

Source: ACS 2013-2017 (DP03 and B17017)



Source: City of Jurupa Valley, HUD, Census Bureau ACS 2013-2017

Figure 2-4
City of Jurupa Valley
2018 Low/Mod Income Areas by Census Block Group



Source: City of Jurupa Valley, HUD, Census Bureau ACS 2013-2017

Figure 2-5
2017 Family Households Below the Citywide Average Poverty Levels by Census Block Group



Education

It is important to recognize that education has been known to significantly affect the earning capacity of individuals. As presented in **Table 2-7**, 29.5 percent of Jurupa Valley residents age 25 and older did not graduate from high school as compared to only 19.0 percent countywide. While Jurupa Valley residents had a higher percentage of high school graduates (29.4) than the county (26.4%), they had a smaller percentage (41.1%) attaining some form of college education as compared to countywide residents at 54.7 percent.

Table 2-7
Education Level of Residents Age 25 and Older

Education Level	Jurupa Valley		Riverside County	
	Number	% of Total	Number	% of Total
Less than 9 th Grade	10,152	16.5%	138,929	9.3%
9 th to 12 th Grade – No Diploma	7,971	13.0%	144,863	9.7%
High School Graduate	18,111	29.4%	395,824	26.4%
Some College, No Degree	14,244	23.2%	378,489	25.2%
Associate Degree	3,797	6.2%	119,498	8.0%
Bachelor's Degree	5,075	8.2%	205,329	13.7%
Graduate or Professional Degree	2,174	3.5%	117,606	7.8%
TOTAL Population Age 25	61,524	100.0%	1,500,538	100.0%

Source: ACS 2013-2017 (DP02)

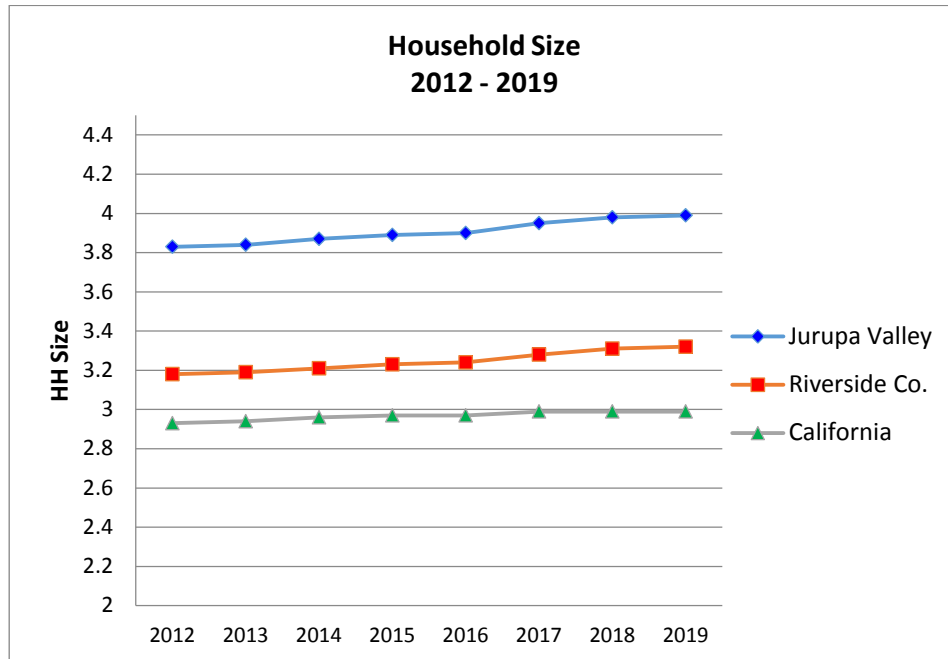
Household Size

Household size is an important indicator of population growth and overcrowding in individual housing units. Typically, communities where there is a large younger population have larger families; on the other hand, communities with an aging population experience a declining household size. The size of a household or family can be a reflection of demographics or cultural of the residents. For instance, co-habitation of extended families may be encouraged, increases the household size. Younger families with children or extended families often prefer larger single-family homes, while single-person households or seniors may often occupy smaller apartments or condominiums due to the lower cost. Understanding changes in household composition can thus provide insight into current and future housing needs.



As illustrated in **Figure 2-6**, there has been a steady increase in the average household size locally and regionally. The average household size in Jurupa Valley was 3.83 in 2012, and it increased to 3.99 in 2019. Jurupa Valley’s household size has been consistently higher than the countywide and statewide averages.

Figure 2-6



Source: *DOF Estimates E-5 Report*

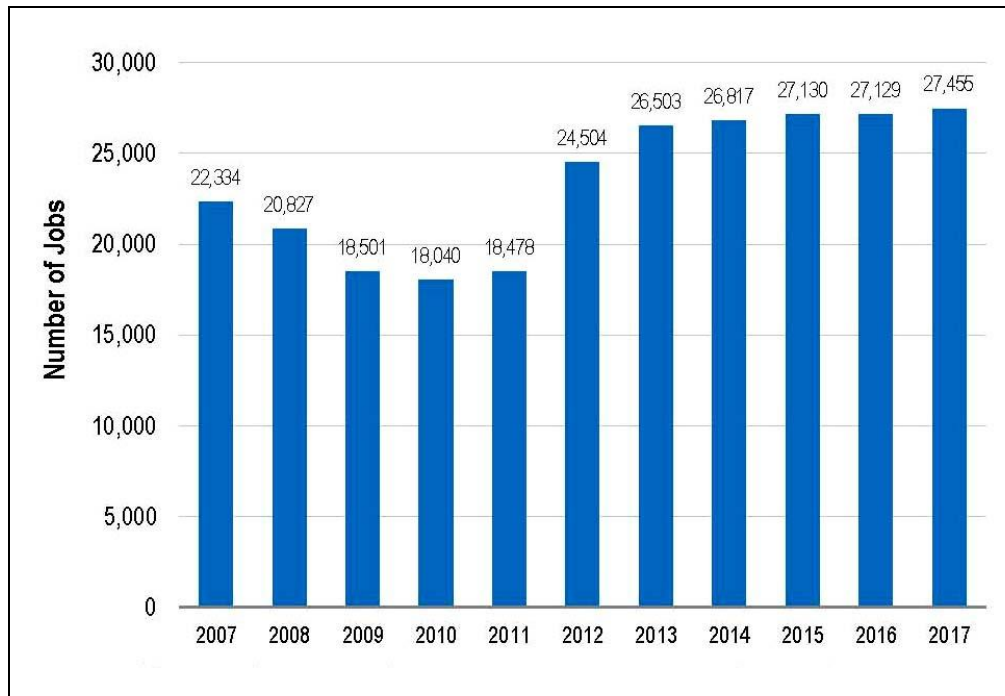
Employment

California Employment Development Department (EDD) data presented in **Figure 2-7**, shows that in 2017 there were an estimated 27,455 jobs in Jurupa Valley. This was an increase of 22.9 percent since 2007, when there were an estimated 22,334 jobs in the Jurupa Valley area. However, the number of jobs declined to 18,040 jobs in 2010 before it recovered and significantly after Jurupa Valley incorporated. These job figures include wage and salary jobs and jobs held by business owners and self-employed persons.

The types of jobs in the City are presented in **Figure 2-8**. It shows that in 2017, the Transportation sector was the largest job sector, accounting for 18.6 percent of the total jobs in the City. Other major sectors included Education (17.0%), Construction (14.9%), and Manufacturing (14.6%). These four job sectors combined for two-third of the total jobs in Jurupa Valley in 2017.

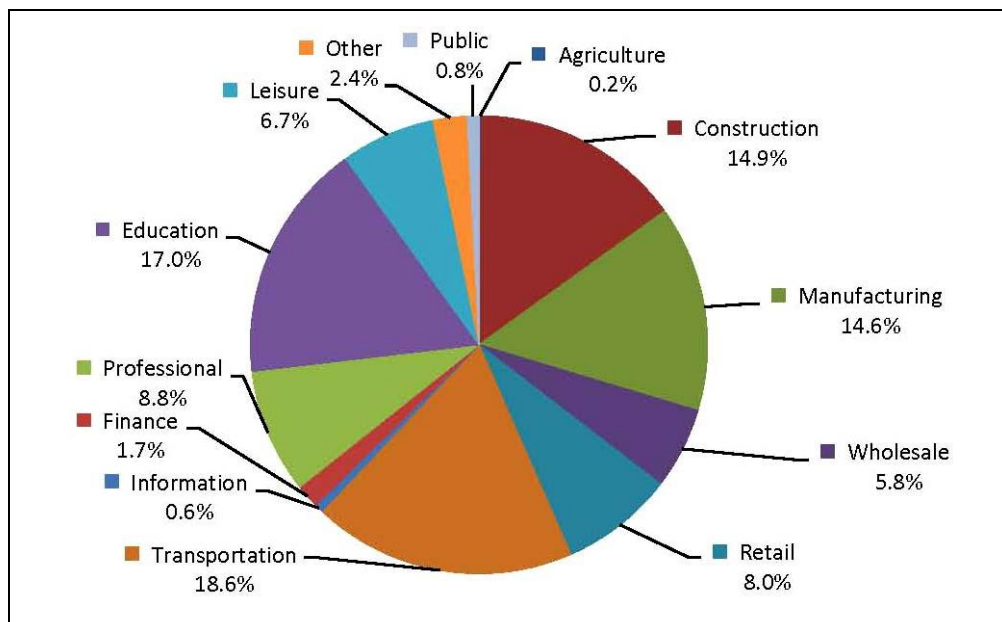


Figure 2-7
Jurupa Valley Jobs



Source: California Employment Development Department, 2007 - 2017; InfoGroup; and SCAG 2019 Local Profiles

Figure 2-8
Jurupa Valley Jobs by Sector, 2017



Source: California Employment Development Department, 2007 - 2017; InfoGroup; and SCAG 2019 Local Profiles



Based on information proved by ESRI/Riverside County Economic Development Agency, Jurupa Valley Unified School District, and the City of Jurupa Valley, the major employment centers in the City are presented in **Table 2-8**. The Jurupa Unified School District (JUSD) is the largest employer in the City with 2,283 classified or certified employees located at various schools and educational facilities throughout the City. The largest number of JUSD employees is located at the Education Center at 4650 Pedley Road with 230 employees. The second largest employer is the Costco Distribution Center at 11600 Riverside Drive located southeast of the I-15 and SR-60 Freeways. Riverside County and Stater Brothers are major employers at various locations in the City. Riverside County includes the office of the Department of Public Social Services and the County Sheriff’s Department station, and Stater Brothers has four stores in the City.

**Table 2-8
Major Employment Centers in Jurupa Valley**

Name	Address	Number of Employees
Jurupa Unified School District	Various location -- Education Center (District Office) 4850 Pedley Road	2,283
Costco Distribution Center	11600 Riverside Drive	>1,000
Riverside Medical Clinic	6250 Clay Street	750
Skanska USA Civil West Ca Dist.	1995 Agua Mansa Road	700
FedEx Freight	12100 Riverside Drive	500
Sierra Aluminum	2345 Fleetwood Drive	450
County of Riverside	Various locations	417
Herman Weissker Inc.	1645 Brown Avenue	400
Stater Bros.	4 Locations	340
Orco Block and Hardscape	4510 Rutile Street	300
Cove Waterpark	4310 Camino Real	300
Komar Distribution Services	11850 Riverside Drive	300
Galasso's Bakery	10820 San Sevaine Way	300

Source: City of Jurupa Valley, Riverside County Economic Development Agency, Jurupa Unified School District



Housing Characteristics

Housing Stock Composition

The majority of Jurupa Valley's housing stock is comprised of single-family dwelling units. According to the ACS 2013-2017 data, which are presented in **Table 2-9**, over 80 percent of the City's housing stock is single-family units (detached and attached). This compares to 73.8 percent countywide. The remaining units in the City include 12.7 percent multi-family (more than two units) and 6.9 percent mobile homes.

Table 2-9
Composition of Housing Stock 2017

Housing Type	Jurupa Valley		Riverside County	
	Units	% of Total	Units	% of Total
Single Family, Detached	20,486	77.2%	562,362	68.0%
Single Family, Attached	867	3.3%	47,640	5.8%
2 to 4 Unit Structure	536	2.0%	40,991	5.0%
5 to 19 Unit Structure	1,595	6.0%	63,513	7.7%
20+ Unit Structure	1,239	4.7%	36,677	4.4%
Mobile Home/RV	1,826	6.9%	75,521	9.1%
TOTAL	26,549	100.0%	826,704	100.0%

Source: ACS 2013-2017 (DP04)

Housing Conditions

Table 2-10 shows that less than one-half (45.7%) of the existing housing stock in the City was constructed after 1980. This leaves 54.3 percent of the homes over 37 years old. Countywide, over two-thirds (67.2%) were constructed after 1980. In Jurupa Valley the median year homes were constructed was 1978, which is ten years older than the countywide median of 1988. In general, homes built more than 30 years ago are likely to require structural renovation and increased maintenance, resulting in greater costs for the owner. Older homes can also create health and safety problems for occupants. Older, deteriorated structures often do not meet current building code standards and lack safety features such as fire suppression, home security devices, and seismic safety retrofits. In fact, stringent seismic safety codes were not developed until after the 1971 Sylmar earthquake. After that event, many building codes were revised to ensure structures could withstand seismic activity of similar magnitude. Additionally, in 1978



the federal government prohibited the use of lead-based paint on residential property; therefore, homes built prior to 1979 have a potential risk of containing lead-based paint. Lead poisoning can cause learning disabilities, behavioral problems and even brain damage in children.²

Table 2-10
Housing Units by Year Structure Built

Housing Type	Jurupa Valley		Riverside County	
	Units	% of Total	Units	% of Total
2010 or later	462	1.8%	25,030	3.0%
2000 to 2009	2,765	10.4%	222,177	26.9%
1990 to 1999	2,670	10.1%	129,989	15.7%
1980 to 1989	6,213	23.4%	178,243	21.6%
1970 to 1979	5,487	20.7%	124,119	15.0%
1960 to 1969	3,027	11.4%	64,071	7.8%
1950 to 1959	3,514	13.2%	49,970	6.0%
1940 to 1949	1,341	5.1%	15,953	1.9%
1939 or earlier	1,070	4.0%	17,152	2.1%
Total Housing Units	26,549	100.0%	826,704	100.0%
Median Year	1978		1988	

Source: ACS 2013-2017 (DP04)

Future Housing Needs

Article 10.6 of the Government Code Section 65580-65590 requires all California localities to adopt a Housing Element as part of their general plan. State Housing Element Law requires that cities and counties address housing for all segments of the population including those that are lower income. The Southern California Association of Governments (SCAG), through the Regional Housing Needs Assessment (RHNA), allocated the regional fair share of housing needs to Jurupa Valley for the 2014-2021 period. According to the RHNA presented in **Table 2-11**, the City of Jurupa Valley must be able to accommodate 1,712 housing units during the 2014-2021 period. Of this total, Jurupa Valley must be able to accommodate at least 409 units (23.9%) for very low-income households, 275 units (16.1%) for low-income households, 307 units (17.9%) for moderate-income households, and 721 units (42.1%) for above moderate-income households during the 2014-2021 period.

²Executive Order 12898—Environmental Justice



Table 2-11
City of Jurupa Valley Regional Housing Needs Assessment
2014-2021

Household Income	Housing Units	Percent
Very Low (<50% MFI)	409	23.9%
Low (51% to 80% MFI)	275	16.1%
Moderate (81% to 120% MFI)	307	17.9%
Above Moderate (>120% MFI)	721	42.1%
TOTAL	1,712	100.0%

Source: SCAG RHNA 5th-Cycle

Special Needs

Certain households, because of their special characteristics and needs, have more difficulty finding decent and affordable housing. The following discussion highlights particular characteristics that could affect an individual household's access to housing in the community.

Elderly/Frail Elderly.

According to 2013-2017 ACS data presented in previous **Table 2-1**, 9.4 percent of Jurupa Valley's total population in 2017 were 65 years and over. Some of the characteristics of elderly residents included: limited mobility; increased medical attention due to health complications; and, restricted fixed income, such as Social Security, pension programs and retirement income. Many elderly people also have difficulty completing normal, everyday tasks without assistance. The 2013-2017 ACS data estimate that approximately two-thirds of the Jurupa Valley's elderly had ambulatory difficulty, which is the highest percentage of the six disability categories classified by the U.S. Census Bureau that include:

- Hearing difficulty: Deaf or having serious difficulty hearing.
- Vision difficulty: Blind or having serious difficulty seeing, even when wearing glasses.
- Cognitive difficulty: Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions.
- Ambulatory difficulty: Having serious difficulty walking or climbing stairs.
- Self-care difficulty: Having difficulty bathing or dressing.
- Independent living difficulty: Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping.



Large Households

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

The 2013-2017 ACS data presented in **Table 2-12**, estimated 7,444 large households (five or more person households) in the City, which represented 29.6 percent of all households. Among the total number of owner households (16,560), 29.3 percent were owner households of five or more persons and among renter households (8,610), 30.1 percent were renter households with five or more persons.

Table 2-12
Jurupa Valley Owner and Renter Size of Households 2017

	Owner		Renter	
	Number	% of Total	Number	% of Total
1 Person	1,757	10.6%	1,997	23.2%
2 Persons	4,225	25.5%	1,533	17.8%
3 Persons	2,655	16.0%	1,114	12.9%
4 Persons	3,074	18.6%	1,371	15.9%
5 Persons	2,231	13.5%	1,103	12.8%
6 Persons	1,364	8.2%	891	10.3%
7+ Persons	1,254	7.6%	601	7.0%
Total	16,560	100.0%	8,610	100.0%
Total 1-4 persons	11,711	70.7%	6,015	69.9%
Total 5 or more person	4,849	29.3%	2,595	30.1%

Source: ACS 2013-2017 (B25009)



Single-Parent Households

Single-parent families, particularly female-headed families with children, often require special consideration and assistance because of their greater need for affordable housing and accessible day care, healthcare and other supportive services. Because of their relatively lower incomes and higher living expenses, female-headed families have comparatively limited opportunities for finding affordable and decent housing. Female-headed families may also be discriminated against in the rental housing market due to concerned about their ability to make regular rent payments. Consequently, landlords may require more stringent credit checks or higher security deposits for women, which would also be a violation of fair housing laws.

According to **Table 2-13**, there were 5,600 single-parent households in Jurupa Valley in 2017, and two-thirds (66.6%) were female-heads of household. Of all the families whose income in the past 12 month were below the poverty level, one-quarter were female head of household with no husband present, and of that portion, 38.5 percent had a related child under 18 years of age.

Table 2-13
Single-Parent Households and Poverty

Category	Number	% of Total
Total Single-Parent Households		
Male Head of Households	1,870	33.4%
Female Head of Households	3,730	66.6%
Total	5,600	100.0%
Percentage Families Below Poverty Level		
Female Head of Households (no husband present)		25.0%
Female Head of Households with Related Child under 18 years of age		38.5%

Source: ACS 2013-2017 (DP03)

Persons with Disabilities

Fair housing choice for persons with disabilities can be compromised based on the nature of their disability. Persons with physical disabilities may face discrimination in the housing market because of the need for wheelchairs, home modifications to improve accessibility or other forms of assistance. Landlords/owners sometimes fear that a unit might sustain wheelchair damage or might refuse to exempt disabled tenants with service/guide animals from a no-pet policy. A



major barrier to housing for people with mental disabilities is opposition based on the stigma of mental illness. Landlords often refuse to rent to tenants with a history of mental illness, and neighbors may object when a house becomes a group home for persons with mental disabilities.

Based on the 2013-2017 ACS data presented in **Table 2-14**, the number of Jurupa Valley residents age 18 and older with some type of disability totaled 10,564, which was 11.3 percent of the City’s total population age 18 years and older. The top three disabilities among persons age five and older with disability include those with ambulatory difficulty (6.5%), independent living difficulty (5.8%), and cognitive difficulty (4.6%). In addition, having a disability negatively impacts a person’s ability to work and earn money. The 2013-2017 ACS (C18130) data estimates that there were 6,702 persons with disabilities ages 18 to 64 years in the City, and of those 19.7 percent had incomes in the past 12 months below the poverty level. This statistic compares to 12.5 percent of those in the same age group with incomes below the poverty level, but with no disability.

**Table 2-14
Persons with Disabilities**

Disability Status	Jurupa Valley		Riverside County	
	With Disability	% of Total	With Disability	% of Total
Total Persons 5 Years and Older	94,120 with or without disabilities		2,175,562 with or without disabilities	
Total Persons 5 Years and Older with Disability ¹				
With Hearing Difficulty	2,641	2.8%	74,407	3.4%
With Vision Difficulty	4,228	4.5%	53,118	2.4%
With Cognitive Difficulty	4,291	4.6%	97,423	4.5%
With Ambulatory Difficulty	6,109	6.5%	172,174	7.9%
With Self-Care Difficulty	2,621	2.8%	58,523	2.7%
With Independent Living Difficulty ²	4,241	5.8%	99,446	4.6%

Source: ACS 2013-2017 (S1810)

(1) Since a single person may have multiple difficulties, sum of persons with individual difficulties is not equal to total number of persons with disability.

(2) Total person for Independent Living Difficulty is for 18 years and over. Total persons with or without disabilities = 73,133 for Jurupa Valley and 1,720,560 for Riverside County

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. Although 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 to provide the accommodation when it is determined to be “reasonable” based on fair housing laws and the case law interpreting the statutes.

Persons with HIV/AIDS

Persons with HIV/AIDS face an array of barriers to obtaining and maintaining affordable, stable housing. For persons living with HIV/AIDS, access to safe, affordable housing could be as important to their general health and wellbeing as access to quality healthcare. For many, the persistent shortage of stable housing can be the primary barrier to consistent medical care and treatment.³ In addition, persons with HIV/AIDS may 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. 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 California Department of Public Health’s California HIV Surveillance Report for 2016 estimates that there were approximately 8,100 people living with a diagnosed HIV infection in Riverside County. This represents 6.1 percent of HIV-diagnosed residents statewide in 2016. Persons with HIV/AIDS face an array of barriers to obtaining and maintaining affordable, stable housing. For persons living with HIV/AIDS, the persistent shortage of stable housing can be the primary barrier to consistent medical care and treatment. In addition, persons with HIV/AIDS may be targets of hate crimes and discrimination, including illegal eviction from their homes when their illness is exposed. The Fair Housing Amendments Act of 1988 prohibits housing discrimination against persons with disabilities, including persons with HIV/AIDS. In addition, persons with HIV/AIDS are not generally able to hold jobs involving frequent interaction with the public due to their immune system deficiencies. Therefore, their job inventory is much less diverse than that for the typical citizen. Job placement could be imperative for this group to maintain sufficient income to afford their medication and live in decent and affordable housing.

The City of Riverside is the Grantee of the HOPWA formula funding for both Riverside and San Bernardino County. The Housing Authority of the County of Riverside (HACR), as the Project Sponsor, administers the HOPWA grant throughout Riverside County. The HOPWA program prevents homelessness for individuals and/or families that have AIDS/HIV by providing long term rental assistance through the Housing Options Program and Short Term Rental, Mortgage and Utility Assistance. The Housing Options Program provides 90 units of permanent affordable housing via tenant based rental assistance to households at or below 80 percent of AMI.

³National AIDS Housing Coalition, *AIDS and Behavior* (Vol. 11, Suppl. 2, November 2007)



Homeless Persons

Over the last several decades, the increasing homeless population has become issues of local, regional, and national significance. Lack of affordable housing can exacerbate homelessness, and hinders a community's ability to effectively address this challenge. A homeless family or individual as defined by federal regulations is a person or family that lacks a fixed and regular nighttime residence. The homeless population can be divided into two major groups, the sheltered and the unsheltered homeless. Sheltered homeless are those individuals or families whose primary residence is an emergency shelter, transitional housing, a domestic violence shelter, a shelter for runaway children, or people living in a motel/hotel under a voucher arrangement. Unsheltered homeless are individual or families with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

In 2019, Riverside County conducted a count of the number of homeless in the county in a given 24-hour period, which is known as the Homeless Point-in-Time (PIT) Count survey. The PIT Count is a one night snapshot of homelessness. The Department of Public Social Services (DPSS), in partnership with the County of Riverside Continuum of Care (a network of private- and public-sector homeless service providers) and cities, coordinated the PIT Count held on the morning of January 29, 2019. Multiple county departments participated, including the Department of Behavioral Health, Code Enforcement, Housing Authority, Probation and the Sheriff's Office.

In the 2019 PIT Count, 2,811 sheltered and unsheltered homeless individuals were counted countywide, an increase of 21 percent over the 2018 count. The 2019 count also shows that 139 unsheltered homeless individuals were counted in the City of Jurupa Valley, a decline of nine homeless persons from 2018.

- Key findings from the 2019 PIT Count for Jurupa Valley include:
- 54 percent of homeless persons were White and 35 percent were Hispanic
- 67 percent of homeless persons were male
- 87 percent were adults age 24 and over, 5 percent youths 18-24 years
- 4 percent were veterans
- 37 percent were chronically homeless
- 15 percent had a mental health condition
- 28 percent had substance abuse
- 17 percent had physical disability and 9 percent had developmental disability.
- No children or families with children were interviewed



Overcrowding and Overpaying for Housing

Overcrowding. As defined by the state and HUD, overcrowding occurs when there is more than one person per room (excluding kitchens, bathrooms and hallways), and occupancy by more than 1.5 persons per room is considered severe overcrowding. As shown in **Table 2-15**, overcrowding occurred in 10.9 percent of the City's total occupied units and severe overcrowding in 4.9 percent of the total occupied units in 2017. It also shows that overcrowding occurs in 17.3 percent of the total rental stock as compared to 11.9 percent of the owner occupied housing stock. This indicates the need for larger rental units and/or more rental subsidies to allow large households to afford adequately sized units. Conditions of overcrowding are largely a combination of the lack of large rental units and the inability of most large renter households to afford larger units, which tend to be more commonly available as ownership housing.

Table 2-15
Overcrowding and Overpaying in Jurupa Valley

	Owner		Renter		Total	
	Occupied Units	Percent	Occupied Units	Percent	Occupied Units	Percent
Overcrowding (Occupants per Room)						
1.00 or Less	14,588	88.1%	6,607	76.7%	21,195	84.2%
1.01 to 1.50	1,378	8.3%	1,361	15.8%	2,739	10.9%
1.51 or more	594	3.6%	642	1.5%	1,236	4.9%
Total Household	16,560	100.0%	8,610	100.0%	25,170	100.0%
Overpaying						
Less Than 30%	11,138	67.3%	3,249	37.7%	14,387	57.2%
30% or More	5,326	32.2%	5,048	58.6%	10,374	41.2%
Not Computed	96	0.6%	313	3.6%	409	1.6%
Total Households	16,560	100.0%	8,610	100.0%	25,170	100.0%

Source: ACS 2013-2017 (DP04) and (B25014)



Overpaying. The most prevalent housing problem facing Jurupa Valley households was overpayment on housing cost. A household is considered to be overpaying for housing if housing costs (rent plus utilities) make up more than 30 percent of the household’s gross monthly income. A major consequence of overpayment is that less income is available to satisfy other needs, the largest of which tends to be transportation costs, as well as medical expenses.

Table 2-15 also shows that of the 25,170 total occupied units or households in the City, overpaying occurred with 10,374 occupied units (41.2%). Renter households tended to overpay more for housing than owners. Overpaying accounts for over one-half (58.6%) of the total rental stock, as compared to less than one-third (32.2%) of owner occupied housing.

Fair Market Rent

Fair Market Rent (FMR) is the amount of money a property would rent or lease for if it was available at this time, and is used by HUD to determine how much rent should be covered through the Section 8 Voucher program for individuals with low income. **Table 2-16** presents the FMR for the Riverside-San Bernardino-Ontario MSA, which Jurupa Valley is located in. It shows that the FY 2019 FMR for an efficiency/studio is \$826 up to four-bedroom unit at \$2,132. In the last year (2018 to 2019), the FMR increase by approximately 6.0 to 7.5 percent.

**Table 2-16
HUD Fair Market Rent
Riverside-San Bernardino-Ontario MSA**

Year	Number of Bedrooms				
	Efficiency/ Studio	1	2	3	4
FY 2019 FMR	\$826	\$986	\$1,232	\$1,717	\$2,132
FY 2018 FMR	\$768	\$926	\$1,156	\$1,618	\$2,004

Source: HUD FY 2018 and 2019 Fair Market Rent

Table 2-17 presents the 2019 HUD Section 8 income limits by family size for the Riverside-San Bernardino-Ontario MSA. HUD sets income limits that determine eligibility for assisted housing programs including public housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD develops income limits based on Median Family Income (MFI) estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county.



**Table 2-17
FY 2019 Section 8 Income Limits
Riverside-San Bernardino-Ontario MSA**

Limit Category	Median Family Income \$69,700							
	Number of Persons							
	1	2	3	4	5	6	7	8
Extremely Low (<30%)	\$15,100	\$17,250	\$21,330	\$25,750	\$30,170	\$34,590	\$39,010	\$43,430
Very Low (31% to 50%)	\$25,150	\$28,750	\$32,350	\$35,900	\$38,800	\$41,650	\$44,550	\$47,400
Low (51% to 80%)	\$40,250	\$46,000	\$51,750	\$57,450	\$62,050	\$66,650	\$71,250	\$75,850

Source: HUD Section 8 Income Limits FY 2019

A family’s gross annual income is compared to the applicable income limits to determine eligibility for housing assistance and must be within the income limits for the Public Housing Authority’s jurisdiction. To be eligible for public housing assistance, the family’s gross annual income may not exceed the current low-income limits by number of persons.

Public Transit System

Public transit information is important to the AI, as access to public transit is of paramount importance to households affected by low incomes and rising housing prices. Public transit should link lower-income persons, who are often transit dependent, to major employers where job opportunities exist. Access to employment via public transportation can reduce welfare usage rates and increase housing mobility, which enables residents to locate housing outside of traditionally low- and moderate-income neighborhoods. The lack of a relationship between public transit, employment opportunities and affordable housing may impede fair housing choice because persons who depend on public transit will have limited choices regarding places to live. In addition, elderly and disabled persons often rely on public transit to visit doctors, go shopping or attend activities at community facilities. Public transit that provides a link between job opportunities, public services and affordable housing helps to ensure that transit-dependent residents have adequate opportunity to access housing, services and jobs.

Jurupa Valley is served by fixed-route services and a demand-response service for local area residents. The Riverside Transit Agency (RTA) provides both fixed-route and demand-response services and Metrolink offers regional rail service with a station in Jurupa Valley. .



Riverside Transit Agency

The Riverside Transit Agency (RTA) was established as a Joint Powers Agency in 1975 and began operating bus service in 1977. RTA is the Consolidated Transportation Service Agency for western Riverside County and is responsible for coordinating transit services throughout the approximate 2,500 square mile service area. RTA provides both local and regional services throughout the region with 39 fixed routes, eight Commuter Link express routes, and Dial-A-Ride services using 334 vehicles.

RTA is governed by a board of directors comprised of 22 elected officials from 18 cities in western Riverside County and four members of the County Board of Supervisors. The City of Jurupa Valley is one of the member jurisdictions.

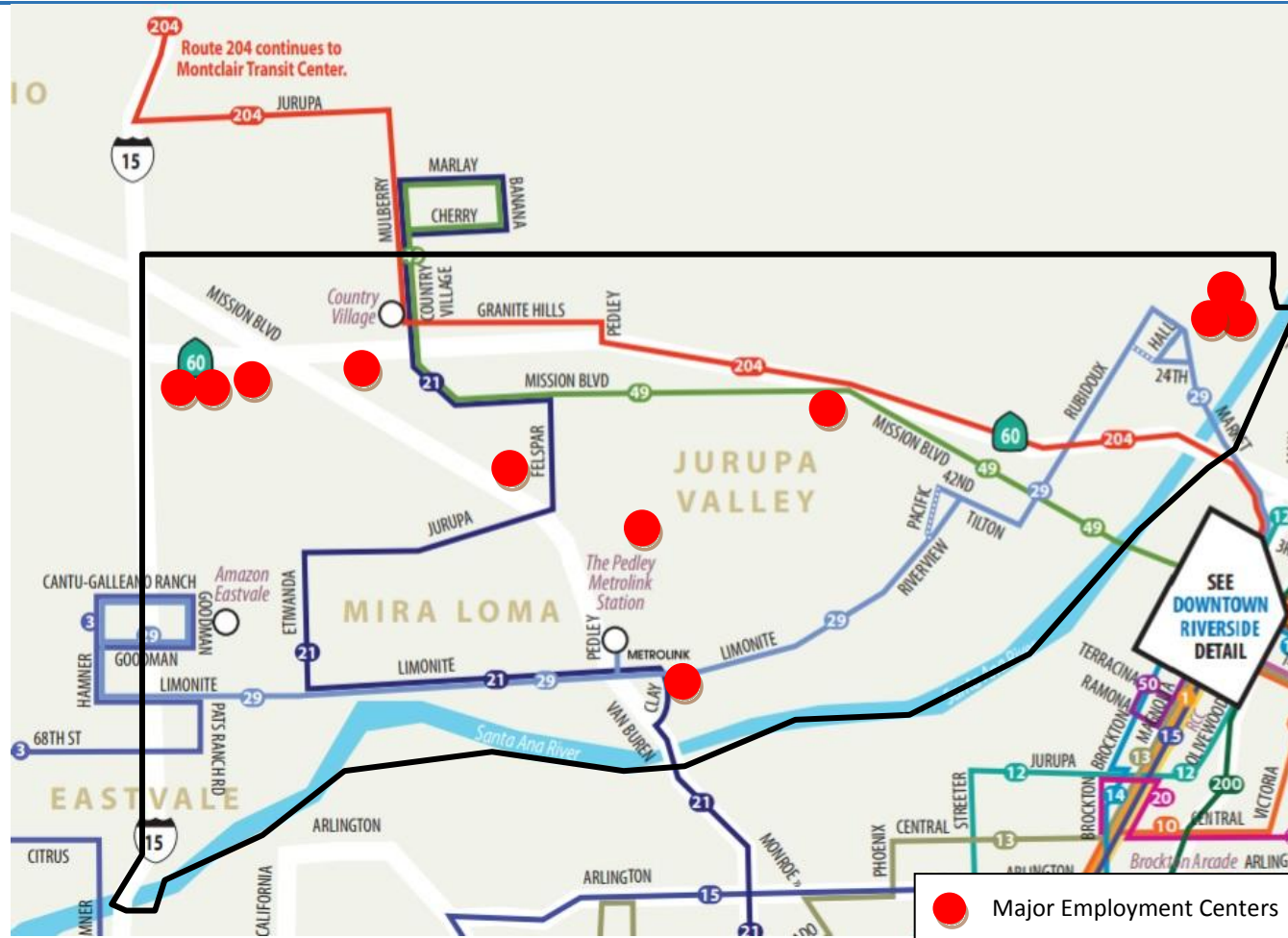
Bus Service. There are four bus lines that serve Jurupa Valley, which are illustrated on **Figure 2-9**. This Figure also shows the locations of the major employment centers identified in previous **Table 2-8**. These bus lines provide service to the Montclair Transit Center, Jurupa Valley Pedley Metrolink Station, Riverside-Downtown Metrolink Station, and Downtown Riverside.

- Route 21 - Galleria at Tyler, Country Village via Jurupa Valley
- Route 29 - Riverside-Downtown Metrolink Station, Downtown Riverside, Jurupa Valley, Eastvale
- Route 49 - Riverside-Downtown Metrolink Station, Downtown Riverside, Country Village, Fontana
- Route 204 - UCR, Downtown Riverside, Country Village, Ontario Mills, Montclair Transcenter

RTA fixed-route buses are accessible to persons with disabilities and all buses are equipped with wheelchair ramps or wheelchair lifts. Audible bus stop announcements are made on all buses.

Dial-A-Ride. The RTA Dial-A-Ride is an origin-to-destination advanced reservation transportation service for seniors and persons with disabilities. Dial-A-Ride vehicles travel to areas within three-quarters of a mile of an RTA local fixed route. These areas are called the "Dial-A-Ride service area" and trips must begin and end in that service area. Dial-A-Ride service is provided at times equivalent to local fixed-route bus service in that area.

ADA Priority Dial-A-Ride service is available to those individuals who are unable to use fixed-route bus service due to their disability. Persons who are ADA-certified are eligible for trips throughout the RTA service area that are within three-quarters of a mile of local fixed-route bus service and during the hours of bus service operation. Individuals who are ADA certified are eligible to bring a Personal Care Attendant (PCA) at no cost if your ADA card permits. A companion or child may come along and will be required to pay a fare.



North

 Source: <https://www.riversidetransit.com/index.php/maps-schedules>

**Figure 2-9
 Riverside Transit Agency Bus Lines
 and Major Employment Centers**



Seniors age 65 and above and persons with disabilities are eligible for local Dial-A-Ride service within a single city and within three-quarters of a mile of local fixed-route bus service during the hours of bus service operation. Transportation is provided only within the city in which your trip begins.

The Dial-A-Ride Plus Lifeline Service provides access to lifeline services for those who are outside the three-quarter mile boundary and have no other transportation options. Trips are restricted to life-sustaining services and provide an additional two-mile radius of the fixed-route boundary. Passenger fares will be identical to those charged for traditional Dial-A-Ride service.

Eligible participants must be 65 or older or must have a disability that creates a need for specialized transportation. Service will be provided using wheelchair accessible taxis, currently being utilized under the Agency's taxi overflow services contract. These trips will be coordinated using the existing Dial-A-Ride trip process.

The base fare for Dial-A-Ride service is \$3.50 per passenger, per boarding. The maximum fare is \$10.50 per one-way trip and will be based on the number of city zones you travel. Depending on where your trip begins and ends, you may be required to transfer. Exact fare for the entire trip is required and must be paid upon boarding your first bus.

Only ADA-certified passengers may bring a PCA. If eligible, your attendant may accompany you at no charge and an additional companion may ride for \$3.50 per fare zone if space is available. If you plan to bring a child as a companion, and the child is less than 46 inches tall, they may ride for 75 cents per fare zone.

The Buddy Fare is a way to save money on Dial-A-Ride. With this special program, two to 10 eligible customers can share the fare for each fare zone. The entire group must be picked up within a half-mile radius of each other and travel to the same destination. Basic RTA fares are presented in **Table 2-18**.



**Table 2-18
RTA Fares**

Fare Categories	Base Fare	Day Pass	7-Day Pass	30-Day Pass
Local and Rapid Link Fixed-Rail				
General	\$1.75	\$5	\$20	\$60
Youth (grades 1-12)	\$1.75	\$5	\$20	\$45
Senior/Disabled	\$0.75	\$2.50	\$20	\$30
Medicare Care Holder	\$0.75	\$2.50	\$20	\$30
Veteran	\$0.75	\$2.50	\$20	\$30
Child (46" tall or under)	\$0.50	N/A	N/A	N/A
CommuterLink				
General	\$3.50	\$10		\$95
Youth (grades 1-12)	\$3.50	\$10		\$95
Senior/Disabled	\$2.75	\$7		\$70
Medicare Care Holder	\$2.75	\$7		\$70
Veteran	\$2.75	\$7		\$70
Child (46" tall or under)	\$2.75	N/A		N/A
Dial-A-Ride		Ticket Book		
Senior/Disabled	\$3.50	\$35		
Medicare Care Holder	\$3.50	\$35		
Child (46" tall or under)	\$0.75	N/A		

Source: Riverside Transit Agency - <https://www.riversidetransit.com/index.php/fares-a-passes/fares-a-passes>

Metrolink Service. Metrolink is a commuter rail system of seven lines that serve the counties of Los Angeles, Orange, Riverside, San Bernardino, Ventura, and northern San Diego. The regional Metrolink system is illustrated in **Figure 2-10**. It is a network of lines and stations that connect Southern California residents to major destinations and employment centers. In Riverside County there are three Metrolink lines (Riverside, Inland Empire-Orange County, and 91 Perris Valley lines), with the Riverside line traversing the City of Jurupa Valley and stopping at the Jurupa Valley/Pedley station.



North

 Source: https://www.metrolinktrains.com/globalassets/about/metrolink_systemmap

Figure 2-10
Metrolink Commuter Rail System



Metrolink fares are based on trip length and it offers many different types of tickets. Discounts are available to seniors, persons with disabilities, Medicare recipients, students/youths, children (ages 5 and under, and active military. Discounts include:

- **Senior/Disabled/Medicare**
 - 25% off Monthly Pass and 7-Day Pass
 - 50% off One-Way and Round-Trip tickets
 - Seniors qualify for discount if age is 65 or over.
 - Disabled or Medicare discount applies with: LA County Transit Operators Association ID card; Reduced fare ID card from other transit system; Medicare ID card; DMV placard ID card; or LA County Access Services ID Card holders ride at no cost within Los Angeles County only.
 - A Personal Care Attendant (PCA) is allowed to accompany a person with a disability without purchasing a ticket. The PCA must board and detrain with the person with a disability.
- **Student/Youth**
 - 25% off Monthly Pass, 7-Day Pass, One-Way and Round-Trip tickets
 - Youths: Ages 6 to 18
 - Students: Please present valid Student ID to the fare inspector upon request.
- **Child (Ages 5 and under)**
 - Three children ride free with an adult using a valid ticket - each additional child pays youth fare.
- **Active Military**
 - 10% off One-Way and Round-Trip tickets
 - *Present a valid Common Access Card (CAC)*

Table 2-19, is an example of the Metrolink fares from the Jurupa Valley/Pedley station to the next station east on the Riverside line (Riverside-Downtown station).

Table 2-19
Metrolink Fares
Jurupa Valley/Pedley Station to Riverside-Downtown Station

Fares	1-Way	Round-Trip	7-Day Pass	Monthly Pass
Regular	\$4.25	\$8.00	\$29.75	\$119.00
Senior/Disabled/Medicare	\$2.00	\$4.00	\$22.25	\$89.25
Student/Youth	\$3.25	\$6.50	\$22.25	\$89.25
Active Military	\$3.75	\$7.50	--	--

Source: Metrolink - <https://www.metrolinktrains.com/ticketsOverview/ticket-info/price-finder/>



Public Assisted Housing

The availability and location of public-assisted housing may be a fair housing concern. If such housing is concentrated in one area of a community, a household seeking affordable housing is limited to choices within that particular area. Public assisted housing and housing assistance must be accessible to qualified households regardless of race/ethnicity, disability or other special characteristics.

Housing Authority of the County of Riverside

The City of Jurupa Valley does not have a housing authority. The Housing Authority of the County of Riverside (HACR) oversees public housing programs for Jurupa Valley and other participating jurisdictions. HACR is a public agency chartered by the State of California to administer public housing programs for Jurupa Valley and other participating jurisdictions within the county. In order to qualify for these programs, residents must have an annual gross income at or below 80 percent of the Area Median Income (AMI), or be seniors or persons with disabilities.

Section 8 Housing Voucher Program. The Section 8 Housing Voucher program provides rental subsidies to low-income families that spend more than 30 percent of their gross income on housing costs. The program pays the difference between 30 percent of the recipients' monthly income and the federally approved payment standard. Recipients of Section 8 vouchers are able to find their own housing, including single-family homes, townhouses and apartments. Participants are free to choose any housing that meets the requirements of the program and are not limited to units located in subsidized housing projects.

Another variable to consider is the number of households requesting rental assistance. Recent information from the County of Riverside Economic Development Agency (EDA) estimates that 344 Jurupa Valley households currently receive rental assistance. There are 270 households that are seniors, 181 that are disabled, 17 veterans, and no homeless currently receiving assistance. This information may be duplicated where some seniors are also disabled and some disabled are also seniors. Based on consultation with HARC staff, as of February 2018, 1,742 Jurupa Valley households were on the waitlist for federal rental assistance. Of these households, 292 are senior households, 409 are disabled households, and 282 are self-identified as "homeless" Jurupa Valley households.

Race/ethnicity of voucher holders is not reported exclusively; voucher holders can identify with more than one race/ethnicity. According to data from PIH Information Center that is in the Jurupa Valley's recent ConPlan, 62.5 percent of voucher holders identify as White. One-third of the voucher holder identify as Black/African American, 2.4 percent identify as Asian, and about one-quarter (26.5%) of voucher holders identify as being of Hispanic origin.

Public Housing. The City's ConPlan indicates that there were 456 households in public housing in Jurupa Valley, and that 331 households or 72.6 percent were homeless at admission, and 15.4 percent had a member with a disability. One hundred percent of households requested



accessibility features. In addition, householders who were elderly (>62 years) accounted for 8.3 percent of the total households in public housing. No households reported participating in the HIV/AIDS program or a domestic violence victim.

Race/ethnicity of public housing residents is not reported exclusively; residents can identify with more than one race/ethnicity. Whites formed the largest racial group among public housing residents, with 318 residents or 69.7 percent of participants. Over one-quarter (27.6%) of participants identify as Black/African American, two percent as Asian, less than one percent as American Indian/Alaska Native and Pacific Islander, and 55.2 percent of all participants identify as Hispanic.

Affordable Housing Projects

Apartment projects can receive housing assistance from a variety of sources to ensure that rent is affordable for lower-income households. In exchange for public assistance, owners are typically required to reserve a portion or all of the units as affordable housing for lower-income households. The length-of-use restrictions are dependent on the funding program. The types of public assistance commonly used by owners when partnering with local jurisdictions are the HOME and CDBG programs. These funds are typically used in concert with Low Income Housing Tax Credits (LIHTC) to reduce the debt associated with the project, thereby maximizing affordability.

The LIHTC program creates an incentive for private investment in low-income housing development by giving federal tax credits to investors. Private investors, such as banks and corporations, buy the tax credits from an affordable housing developer. The owner/developer uses the proceeds from the sale of these tax credits, known as “equity,” to construct or rehabilitate housing. Investors receive a federal tax credit over a 10-year term. Information from the California Tax Credit Allocation Committee⁴ website identifies one LIHTC rental housing development in the City of Jurupa Valley. It is identified as Vista Rio Apartments, located at 3901 Brigs Street, Jurupa Valley, 92509. This is a nine percent tax credit funded project for large families-type new housing. It includes a total of 39 units, of which 38 are low-income units.

Community Care Facilities

Individuals with special needs, including the elderly or persons with physical or mental disabilities, need access to suitable housing in their community. This segment of the population often needs affordable housing that is located near public transportation, social and health services, and shopping. Persons with disabilities may require units equipped with wheelchair accessibility or other special features that accommodate physical or sensory limitations. Depending on the severity of the disability and support program regulations and reimbursement levels, people may live independently with some assistance in their own homes, in assisted living, or other special care facilities.

⁴ <https://www.treasurer.ca.gov/ctcac/projects.asp>



Table 2-20 shows the number of licensed community care facilities in the City of Jurupa Valley and the total Riverside County. In total, there are over 544 licensed community care facilities, serving adults, elderly and persons with disabilities (including children) that are located in the Riverside County. In Jurupa Valley there are 14 Adult Residential Facilities and nine Assisted Living Residential Care Facility for the Elderly. Addresses are not available for Children’s Residential Group Homes in Jurupa Valley.

Table 2-20
Licensed Residential Care Facilities

Facilities	Jurupa Valley	Riverside County
Adult Residential Facility	14	232
Asst. Living Resid. Care Fac. for the Elderly	9	227
Adult Day Care	0	37
Children’s Residential Group Homes	NA	27
Small Family Homes	0	21

Source: California Department of Social Services, Community Care Licensing Division
<https://secure.dss.ca.gov/CareFacilitySearch/home/selecttype/>

The licensed care facilities for the special needs residents are defined as follows by the California Department of Social Services, Community Care Licensing Division:

- **Adult Residential Facilities (ARF)** provide 24-hour non-medical care for adults ages 18 years through 59 years old who are unable to provide for their own daily needs. ARFs include board and care homes for adults with developmental disabilities and mental illnesses.
- **Residential Care Facilities for the Elderly (RCFE)** provide care, supervision, and assistance with daily living activities, such as bathing and grooming. In California, “elderly” is considered age 60 and above.
- **Adult Day Care** facilities provide care to persons 18 years of age or older in need of personal services, supervision, or assistance essential for sustaining the activities of daily living or for the protection of these individuals on less than a 24-hour basis.
- **Children's Residential Group Homes** provide 24-hour non-medical care and supervision to children. Services include social, psychological, and behavioral programs for troubled youth.
- **Small Family Homes (SFH)** provides 24-hour care in the licensee’s family residence for six or fewer children who require special supervision as a result of a mental or developmental disability or physical handicap.

In addition to the residential care facilities described above, there are a wide variety of programs to assist special needs populations and individuals and families who are homeless or at risk of homelessness. Many programs also target specific groups such as youth, veterans, or persons with HIV/AIDS.



3. Mortgage Lending Practices

An essential aspect of fair housing choice is equal access to credit for the purchase or improvement of a home. In the past, fair lending practices were not always employed by financial institutions. Credit market distortions and other activities such as redlining – a practice whereby a lender provides unequal access to credit or unequal credit terms to a person because of their race, creed, color or national origin or other characteristic(s) of the residents of the area where the applicant resides or will reside - prevented some groups from equal access to credit.

Discriminatory practices in home mortgage lending have evolved in the past five to six decades. In the 1940s and 1950s, racial discrimination in mortgage lending was easy to spot. From government-sponsored racial covenants, to the redlining practices of private mortgage lenders and financial institutions, ethnic minorities were denied access to home mortgages in ways that severely limited their ability to purchase a home. In recent years, discriminatory lending practices have become more subtle. By employing high pressure sales practices and deceptive tactics, some mortgage brokers pushed minority borrowers into high-cost subprime mortgages that were not well suited to their needs and led to financial problems.

In the past, fair lending practices were not always employed by financial institutions. Credit market distortions and other activities such as redlining prevented some groups from equal access to credit. Some of the key mortgage lending laws are summarized below.

Lending Laws and Regulations

Community Reinvestment Act

The passage of the Community Reinvestment Act (CRA) in 1977 was designed to improve access to credit for all members of the community. The CRA is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low- and moderate-income neighborhoods. The CRA requires that each insured depository institution's record in helping meet the credit needs of its entire community be evaluated periodically. That record is taken into account in considering an institution's application for deposit facilities, including mergers and acquisitions. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance, such as the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), Office of the Comptroller of the Currency (OCC), and Office of Thrift Supervision (OTS).



Fair Housing Act and Amendment

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended on September 13, 1988 and became effective on March 12 1989 (The Fair Housing Amendments Act), prohibits discrimination in the sale, rental, and financing of residential dwellings, and in other residential real estate related transactions, based on race, color, national origin, religion, sex, familial status (defined as families with children under the age of 18 living with parents or legal custodians, pregnant women, or people in the process of securing the custody of children under the age of 18), and disability. The Act makes it unlawful to engage in the following practices based on race, color, national origin, religion, sex, familial status or handicap (disability):

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan or set different terms or conditions for purchasing a loan

Equal Credit Opportunity Act

Regarding any type of credit transaction - under the Equal Credit Opportunity Act, a creditor may not discriminate against an applicant based on the applicant's race, color, or national origin.

Home Mortgage Disclosure Act

In tandem with the CRA, the Home Mortgage Disclosure Act (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.

Detailed HMDA data for conventional and government-backed home purchase and home improvement loans in Jurupa Valley were examined. HMDA data provides some insight into the lending patterns that exist in a community. However, the HMDA data is used only to indicate the potential for unfair lending practices; the data cannot be used to reach definite conclusions on discriminatory practices.

Fraud Enforcement and Recovery Act

The Fraud Enforcement and Recovery Act of 2009, or FERA, was enacted May 20, 2009. This federal law enhanced criminal enforcement of federal fraud laws, especially regarding financial institutions, mortgage fraud, and securities fraud or commodities 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. In addition, FERA includes provisions to protect funds expended under TARP and the Recovery Act and amends the Federal securities statutes to cover fraud schemes involving commodity futures and options. Additional funds were also made available under FERA to a number of enforcement agencies in order to investigate and prosecute fraud.

Detailed FFIEC data, aggregated by CLC Compliance Technologies, Inc. for conventional and government-backed home purchase and home improvement loans for the City of Jurupa Valley are presented in **Tables 3-1 to 3-10**. The FFIEC data provide some insights regarding the lending patterns that exist in a community. However, the data are only an indicator of potential problems; the data lack the financial details of the loan terms to make a definite conclusion that redlining or discrimination exists.

Overall Lending Patterns

Data and Methodology

The availability of financing affects a person's ability to purchase or improve a home. Under the 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 are submitted by lending institutions to the FFIEC. Certain data is available to the public via the FFIEC site either in raw data format or as pre-set printed reports. The analyses of HMDA data presented in this AI were conducted using data from Compliance Tech and FFIEC. Compliance Tech's Lending Patterns database tool that analyzes lending records to produce reports on various aspects of mortgage lending was used in this report. HMDA data included in this report includes market share, approval rates, denial rates, low/moderate income lending, and high-cost lending, among other key lending aspects in the City of Jurupa Valley.

General Overview

A summary of all home purchase loan activities that went through the complete loan process (loans approved, denied and approved then rejected by applicants) from 2013 to 2017 - can be found in **Tables 3-1 to 3-10**. The types of loans reviewed included home purchase, refinancing and home improvement loans. Furthermore, the loan information is provided by outcomes of race, ethnicity, income and gender.

In general, home purchase loans have had denial rates that were above County figures. In 2017 the home purchase denial rate for the City of Jurupa Valley was less approximately 15.5 percent – 326 home purchase loans were denied out of 2,097 loans that went through the complete mortgage lending process. The trend for denial rates has been declining, in general, over the



past five years. Five years ago, 21.4 percent of purchase loans were denied in Jurupa Valley, and the denial rate has declined four of the past five years.

Home Purchase, Refinance and Home Improvement Loans - Conventional and Governmental-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 low- and moderate-income households that might 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 interest and are insured (“backed”) by government 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 consumers through private lending institutions. Local programs such as first-time homebuyer and rehabilitation programs are not subject to HMDA reporting requirements.

According to the FFIEC data presented in **Table 3-1**, a total of 1,637 households applied for a total of approximately \$527.9 million of conventional home purchase loans in the City of Jurupa Valley during 2017. Of those that applied for a conventional loan, 1,290 loans were approved and accepted by the applicant for a total of \$420.3 million. The approval rate for all applicants was 82.6 percent, whereas the denial rate was 17.4 percent. Approximately, 3.8 percent of loans that were approved by the lending institutions were rejected by applicants.

Government-backed loans (FHA, FSA/RHS and VA loans) provide approximately 21 percent of total mortgage lending in Jurupa Valley (2017). During 2017, government-backed loans received 460 applications totaling approximately \$158.0 million. The approval rate for government-backed loans was 91.1 percent and the denial rate was 8.9 percent. The total amount of government-backed loans approved and accepted by the applicant totaled \$136.0 million in 2017. In addition to the detail data provided for 2017 – five year trend data was also provided for home purchase, refinancing and home improvement loans. Adding conventional and government-backed loans results in a 84.5 percent approval rate for home purchase loans and a denial rate of 15.5 percent. Specifically, the data includes:

- **Table 3-2** includes data on home purchase denials by race for the five-year period (2013-2017). During the past five years, on average, 1,624 purchase loans go through the complete process each year.
- **Table 3-3** includes data on refinance home loan denials by race for the five-year period (2013-2017). About 2,704 purchase loans go through the complete process each year. While denial rates for purchase loans are 15.5 percent, for refinance application in 2017, the denial rate was 26.8 percent.
- **Table 3-4** includes home improvement loan denials by race for the five-year period (2013-2017). On average, a much smaller number - 282 home improvement loans go through the complete process each year, compared with purchase and refinance loans. Improvement loans also had denial rates significantly higher than purchase and refinance loans, with the denial rate being 36.4 percent in 2017.



**Table 3-1
Home Purchase Loans by Race, Ethnicity and Income
City of Jurupa Valley (2017)**

Loan Category	Total Applications				Originated				Approved Not Accepted				Denied			
	Count	%	(\$000)	%	Units	%	(\$000)	%	Count	%	(\$000)	%	Count	%	(\$000)	%
Loan Purpose and Type																
Purchase - Conventional	1,637	78.1	527,936	77.0	1,290	76.6	420,336	75.5	62	72.1	25,163	76.4	285	87.4	82,437	85.3
Purchase - Government	460	21.9	158,053	23.0	395	23.4	136,050	24.5	24	27.9	7,772	23.6	41	12.6	14,231	14.7
Total	2,097	100	685,989	100	1,685	100	556,386	100	86	100	32,935	100	326	100	96,668	100
Applicant Race																
American Indian/Alaska Native	9	0.4	3,413	0.5	7	0.4	2,713	0.5	0	-	0	-	2	0.6	700	0.7
Asian	539	25.7	183,604	26.8	451	26.8	153,243	27.5	15	17.4	4,623	14.0	73	22.4	25,738	26.6
Black or African American	80	3.8	26,811	3.9	53	3.1	19,014	3.4	5	5.8	1,780	5.4	22	6.7	6,017	6.2
Hawaiian / Pacific Islander	14	0.7	5,433	0.8	11	0.7	4,313	0.8	2	2.3	695	2.1	1	0.3	425	0.4
White	1,172	55.9	364,769	53.2	949	56.3	302,688	54.4	56	65.1	16,668	50.6	167	51.2	45,413	47.0
2 or More Minority Races	2	0.1	763	0.1	2	0.1	763	0.1	0	-	0	-	0	-	0	-
Joint Race (White/Minority)	43	2.1	16,164	2.4	39	2.3	14,451	2.6	0	-	0	-	4	1.2	1,713	1.8
Race Not Available	238	11.3	85,032	12.4	173	10.3	59,201	10.6	8	9.3	9,169	27.8	57	17.5	16,662	17.2
Total	2,097	100	685,989	100	1,685	100	556,386	100	86	100	32,935	100	326	100	96,668	100
Applicant Ethnicity																
Hispanic or Latino	799	38.1	236,737	34.5	637	37.8	193,561	34.8	42	48.8	12,134	36.8	120	36.8	31,042	32.1
Not Hispanic or Latino	1,050	50.1	357,715	52.1	857	50.9	295,791	53.2	35	40.7	11,337	34.4	158	48.5	50,587	52.3
Joint (Hisp/Lat / Not Hisp/Lat)	73	3.5	26,251	3.8	62	3.7	22,232	4.0	1	1.2	295	0.9	10	3.1	3,724	3.9
Ethnicity Not Available	175	8.3	65,286	9.5	129	7.7	44,802	8.1	8	9.3	9,169	27.8	38	11.7	11,315	11.7
Total	2,097	100	685,989	100	1,685	100	556,386	100	86	100	32,935	100	326	100	96,668	100

Sources: CLC Compliance Technologies, Inc., Lending Patterns, Federal Financial Institutions Examination Council, July 2019



Table 3-2
Home Purchase Loans - Denials by Race and Ethnicity in the City of Jurupa Valley (2013-2017)

Loan Category	2013				2014				2015				2016				2017				
	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	
Loan Purpose and Type																					
Purchase - Conventional	735	57.8	158	58.1	656	60.9	124	65.3	1,110	64.1	187	65.8	1,343	69.3	217	76.4	1,637	78.1	285	87.4	
Purchase - Government	536	42.2	114	41.9	422	39.1	66	34.7	623	35.9	97	34.2	596	30.7	67	23.6	460	21.9	41	12.6	
Total	1,271	100	272	100	1,078	100	190	100	1,733	100	284	100	1,939	100	284	100	2,097	100	326	100	
Applicant Race																					
American Indian/Alaska Native	10	0.8	5	1.8	9	0.8	1	0.5	12	0.7	3	1.1	15	0.8	3	1.1	9	0.4	2	0.6	
Asian	225	17.7	47	17.3	159	14.7	31	16.3	298	17.2	43	15.1	368	19.0	53	18.7	539	25.7	73	22.4	
Black or African American	34	2.7	7	2.6	30	2.8	9	4.7	70	4.0	17	6.0	96	5.0	15	5.3	80	3.8	22	6.7	
Hawaiian / Pacific Islander	10	0.8	5	1.8	16	1.5	3	1.6	17	1.0	3	1.1	12	0.6	2	0.7	14	0.7	1	0.3	
White	841	66.2	171	62.9	727	67.4	107	56.3	1,112	64.2	168	59.2	1,222	63.0	174	61.3	1,172	55.9	167	51.2	
2 or More Minority Races	2	0.2	1	0.4	1	0.1	1	0.5	3	0.2	2	0.7	3	0.2	2	0.7	2	0.1	0	-	
Joint Race (White/Minority)	17	1.3	3	1.1	22	2.0	4	2.1	50	2.9	7	2.5	37	1.9	3	1.1	43	2.1	4	1.2	
Race Not Available	132	10.4	33	12.1	114	10.6	34	17.9	171	9.9	41	14.4	186	9.6	32	11.3	238	11.3	57	17.5	
Total	1,271	100	272	100	1,078	100	190	100	1,733	100	284	100	1,939	100	284	100	2,097	100	326	100	
Applicant Ethnicity																					
Hispanic or Latino	588	46.3	139	51.1	497	46.1	90	47.4	750	43.3	125	44.0	823	42.4	119	41.9	799	38.1	120	36.8	
Not Hispanic or Latino	541	42.6	102	37.5	457	42.4	72	37.9	803	46.3	124	43.7	907	46.8	130	45.8	1,050	50.1	158	48.5	
Joint (Hisp/Lat / Not Hisp/Lat)	39	3.1	9	3.3	38	3.5	4	2.1	68	3.9	8	2.8	71	3.7	10	3.5	73	3.5	10	3.1	
Ethnicity Not Available	103	8.1	22	8.1	86	8.0	24	12.6	112	6.5	27	9.5	138	7.1	25	8.8	175	8.3	38	11.7	
Total	1,271	100	272	100	1,078	100	190	100	1,733	100	284	100	1,939	100	284	100	2,097	100	326	100	

Sources: CLC Compliance Technologies, Inc., Lending Patterns, Federal Financial Institutions Examination Council, July 2019



Table 3-3
Refinance Loans - Denials by Race and Ethnicity in the City of Jurupa Valley (2013-2017)

Loan Category	2013				2014				2015				2016				2017				
	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	
Loan Purpose and Type																					
Refinance	3,016	100.0	736	100.0	1,895	100.0	549	100.0	2,783	100.0	773	100.0	3,549	100.0	1,102	100.0	2,277	100.0	610	100.0	
Total	3,016	100	736	100	1,895	100	549	100	2,783	100	773	100	3,549	100	1,102	100	2,277	100	610	100	
Applicant Race																					
American Indian/Alaska Native	35	1.2	15	2.0	30	1.6	11	2.0	33	1.2	11	1.4	45	1.3	22	2.0	27	1.2	7	1.1	
Asian	337	11.2	58	7.9	153	8.1	39	7.1	247	8.9	48	6.2	254	7.2	73	6.6	205	9.0	49	8.0	
Black or African American	84	2.8	26	3.5	79	4.2	36	6.6	107	3.8	40	5.2	125	3.5	47	4.3	95	4.2	30	4.9	
Hawaiian / Pacific Islander	29	1.0	9	1.2	11	0.6	6	1.1	28	1.0	9	1.2	30	0.8	12	1.1	28	1.2	11	1.8	
White	1,967	65.2	452	61.4	1,287	67.9	341	62.1	1,887	67.8	494	63.9	2,344	66.0	663	60.2	1,414	62.1	344	56.4	
2 or More Minority Races	5	0.2	1	0.1	0	-	0	-	2	0.1	1	0.1	1	0.0	1	0.1	1	0.0	0	-	
Joint Race (White/Minority)	46	1.5	8	1.1	40	2.1	8	1.5	45	1.6	11	1.4	64	1.8	12	1.1	43	1.9	9	1.5	
Race Not Available	513	17.0	167	22.7	295	15.6	108	19.7	434	15.6	159	20.6	686	19.3	272	24.7	464	20.4	160	26.2	
Total	3,016	100	736	100	1,895	100	549	100	2,783	100	773	100	3,549	100	1,102	100	2,277	100	610	100	
Applicant Ethnicity																					
Hispanic or Latino	990	32.8	250	34.0	637	33.6	176	32.1	1,017	36.5	278	36.0	1,333	37.6	425	38.6	870	38.2	220	36.1	
Not Hispanic or Latino	1,546	51.3	331	45.0	968	51.1	275	50.1	1,328	47.7	347	44.9	1,606	45.3	477	43.3	992	43.6	254	41.6	
Joint (Hisp/Lat / Not Hisp/Lat)	81	2.7	13	1.8	67	3.5	14	2.6	101	3.6	33	4.3	138	3.9	36	3.3	65	2.9	15	2.5	
Ethnicity Not Available	399	13.2	142	19.3	223	11.8	84	15.3	337	12.1	115	14.9	472	13.3	164	14.9	350	15.4	121	19.8	
Total	3,016	100	736	100	1,895	100	549	100	2,783	100	773	100	3,549	100	1,102	100	2,277	100	610	100	

Sources: CLC Compliance Technologies, Inc., Lending Patterns, Federal Financial Institutions Examination Council, July 2019



Table 3-4
Home Improvement Loans - Denials by Race and Ethnicity in the City of Jurupa Valley (2013-2017)

Loan Category	2013				2014				2015				2016				2017				
	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	
Loan Purpose and Type																					
Home Improvement Loans	144	100.0	74	100.0	230	100.0	100	100.0	290	100.0	115	100.0	345	100.0	121	100.0	401	100.0	146	100.0	
Total	144	100	74	100	230	100	100	100	290	100	115	100	345	100	121	100	401	100	146	100	
Applicant Race																					
American Indian/Alaska Native	1	0.7	1	1.4	5	2.2	2	2.0	8	2.8	5	4.3	8	2.3	4	3.3	8	2.0	5	3.4	
Asian	11	7.6	4	5.4	13	5.7	8	8.0	20	6.9	4	3.5	24	7.0	9	7.4	19	4.7	7	4.8	
Black or African American	5	3.5	1	1.4	8	3.5	5	5.0	11	3.8	9	7.8	9	2.6	5	4.1	9	2.2	6	4.1	
Hawaiian / Pacific Islander	1	0.7	1	1.4	3	1.3	1	1.0	4	1.4	1	0.9	2	0.6	0	-	3	0.7	1	0.7	
White	85	59.0	43	58.1	136	59.1	56	56.0	175	60.3	56	48.7	227	65.8	71	58.7	254	63.3	76	52.1	
2 or More Minority Races	0	-	0	-	0	-	0	-	0	-	0	-	0	-	0	-	1	0.2	1	0.7	
Joint Race (White/Minority)	1	0.7	0	-	5	2.2	4	4.0	5	1.7	4	3.5	9	2.6	2	1.7	8	2.0	2	1.4	
Race Not Available	40	27.8	24	32.4	60	26.1	24	24.0	67	23.1	36	31.3	66	19.1	30	24.8	99	24.7	48	32.9	
Total	144	100	74	100	230	100	100	100	290	100	115	100	345	100	121	100	401	100	146	100	
Applicant Ethnicity																					
Hispanic or Latino	59	41.0	36	48.6	92	40.0	44	44.0	110	37.9	52	45.2	137	39.7	52	43.0	171	42.6	68	46.6	
Not Hispanic or Latino	64	44.4	26	35.1	86	37.4	37	37.0	123	42.4	37	32.2	140	40.6	40	33.1	170	42.4	50	34.2	
Joint (Hisp/Lat / Not Hisp/Lat)	0	-	0	-	8	3.5	3	3.0	7	2.4	3	2.6	19	5.5	7	5.8	12	3.0	5	3.4	
Ethnicity Not Available	21	14.6	12	16.2	44	19.1	16	16.0	50	17.2	23	20.0	49	14.2	22	18.2	48	12.0	23	15.8	
Total	144	100	74	100	230	100	100	100	290	100	115	100	345	100	121	100	401	100	146	100	

Sources: CLC Compliance Technologies, Inc., Lending Patterns, Federal Financial Institutions Examination Council, July 2019



The data shows that in Jurupa Valley the White racial group had the highest number of home purchase loans completed – 55.9 percent. Other racial groups - Asian (25.7 percent) and African American (3.8 percent) had lower number of purchase loans completed in Jurupa Valley. The Hispanic ethnic group (not considered a race by the Census and other reporting agencies) had 38.1 percent of all purchase loans originated in Jurupa Valley. Denial rates by race were also analyzed. In Jurupa Valley, denial rates, as a percent of total denials as shown in **Table 3-5**, was highest for White (51.2%), Hispanic (36.8%), Asian (22.4%) and African Americans (6.7%). This table also compares the completed and denial rates with the population in the City of Jurupa Valley. White, Black or African American and Asian racial groups had more loans completed than their share of the City’s population, while Hispanics had less home purchase loans than their share of the population. There are two significant figures in this table; Asian racial group, while they make up 2.7 percent of the population in Jurupa Valley had 25.7 percent of the purchase loans in Jurupa Valley in 2017. While the largest ethnic group in Jurupa Valley – Hispanics, which make up 69.6 percent of the population, had 38.1 percent of completed purchase loans during the subject time period.

**Table 3-5
Home Purchase Loans Compared to Population
By Race and Ethnicity in the City of Jurupa Valley (2017)**

Demographic Data (1)			Home Purchase Loans Data (2)			
Race/Ethnicity	Pop.	%	Denials/Race		Completed Loans	
			Total	%	Total	%
White	55,189	54.0%	167	51.2%	1,172	55.9%
Black or African American	3,373	3.3%	22	6.7%	80	3.8%
Asian	2,759	2.7%	73	22.4%	539	25.7%
American Indian and Alaska Native	1,124	1.1%	2	0.6%	9	0.4%
Native Hawaiian and Other Pacific Islander	204	0.2%	1	0.3%	14	0.7%
Other Race	35,668	34.9%	0	0.0%	-	0.0%
Two or more races	3,986	3.9%	0	0.0%	2	0.1%
Unk/NA			61	18.7%	281	13.4%
Total	102,202	100%	326	100.0%	2,097	100.0%
Hispanic or Latino (any race)	71,133	69.6%	120	36.8%	799	38.1%

(1) Source: American Community Survey 2013-17

(2) Source: CLC Compliance Technologies, Inc., Lending Patterns, July 2019

Tabulations: GRC Associates, Inc., July 2019

1 - Includes conventional and government-assisted (FHA, FSA/RHS and VA) home purchase applications.

2 - Denial rate based on applications that went through the complete underwriting process, and excludes applications withdrawn or files closed for incompleteness.



As shown in **Table 3-6**, which presents disposition of home purchase loans compared to the population composition in 2017, Asians were over represented by 23.0 percent, Whites by 1.9 percent and the Black/African American group by 0.5 percent. Whereas, American Indians, and Hispanic/Latinos were under represented in the City of Jurupa Valley home lending market in 2017. This was especially evident for Hispanic/Latinos (-23.2 percent).

**Table 3-6
Disposition of Home Purchase Loans Compared to Population
By Race and Ethnicity in the City of Jurupa Valley (2017)**

Race / Ethnicity	% of Total Applications	% of Total Population	% Difference in Applications to Total Population
American Indian/Alaska Native	0.4%	1.1%	-0.7%
Asian	25.7%	2.7%	23.0%
Black or African American	3.8%	3.3%	0.5%
Hawaiian / Pacific Islander	0.7%	0.2%	0.5%
White	55.9%	54.0%	1.9%
2 or More Minority Races	0.1%	3.9%	-3.8%
Joint Race (White/Minority)	n/a	n/a	n/a
Race Not Available	13.4%	n/a	n/a
Other Race	n/a	34.9%	n/a
Total	100%	100%	
Applicant Ethnicity			
Hispanic or Latino	38.1%	61.3%	-23.2%

Sources: CLC Compliance Technologies, Inc., Lending Patterns, Federal Financial Institutions Examination Council, July 2019, Home Mortgage Disposition Act (HMDA) data, 20012 and Census ACS 2013-2017



Table 3-7 presents the top 15 lenders in the City of Jurupa Valley. These top 15 lenders made almost all the loans originated in the City. Also, most of the purchase loans were to owner occupants, 90 percent.

**Table 3-7
Top 15 Home Purchase Lenders in the City of Jurupa Valley
By Ownership (2017)**

Rank	Lender	#	Occupancy	
			#	%
1	WELLS FARGO BANK	290	271	93.4%
2	DHI MORTGAGE COMPANY	177	173	97.7%
3	EAGLE HOME MORTGAGE OF CA	132	125	94.7%
4	WILLIAM LYON MORTGAGE, LLC	127	118	92.9%
5	STEARNS LENDING, INC.	124	113	91.1%
6	21ST MORTGAGE CORP.	123	118	95.9%
7	PULTE MORTGAGE L.L.C.	106	105	99.1%
8	SHORE MORTGAGE	97	92	94.8%
9	BROKER SOLUTIONS INC.	94	93	98.9%
10	CATHAY BANK	84	37	44.0%
11	FLAGSTAR BANK, FSB	75	65	86.7%
12	AMERICAN FINANCIAL NETWORK INC	67	63	94.0%
13	EAST WEST BANK	64	13	20.3%
14	PENNYMAC LOAN SERVICES, LLC.	55	55	100.0%
15	FREEDOM MORTGAGE CORP.	53	50	94.3%
Top 15 Lenders in Jurupa Valley		1,668	1,491	89.4%

Sources: CLC Compliance Technologies, Inc., Lending Patterns, Federal Financial Institutions Examination Council, July 2019, Home Mortgage Disposition Act (HMDA) data, 20012

Table 3-8 presents home purchasing loans according to the applicant's income and gender. It shows that the largest number of applicants for both conventional and government-backed loans had incomes that were more than 120 percent of the county median income. There were 1,446 residents in this income group applying for a conventional loan. The approval rate for this income group was 83.1 percent. On the other hand, there were just 24 loans approved at the low income range (0-49 percent) of median in the City of Jurupa Valley.

An analysis of lending patterns for race/ethnicity and income together helps reveal differences among applicants of different races/ethnicities of the same income levels. Although this analysis provides a more in-depth look at lending patterns, it still cannot provide a reason for any discrepancy. Aside from income, many other factors can contribute to the availability of financing, including credit history, the availability and amount of a down payment and knowledge of the home-buying process, among others. The HMDA data does not provide insight into these and many other factors. However, the City should continue to monitor the approval rates among ethnic groups and continue to take appropriate actions to remove barriers to financing, including credit counseling, down payment assistance and homebuyer education programs.



**Table 3-8
Home Purchase Loans by Income and Gender (2017)**

Loan Category	Total Applications				Originated				Approved Not Accepted				Denied			
	Count	%	(\$000)	%	Units	%	(\$000)	%	Count	%	(\$000)	%	Count	%	(\$000)	%
Loan Purpose and Type																
Purchase - Conventional	1,637	78.1	527,936	77.0	1,290	76.6	420,336	75.5	62	72.1	25,163	76.4	285	87.4	82,437	85.3
Purchase - Government	460	21.9	158,053	23.0	395	23.4	136,050	24.5	24	27.9	7,772	23.6	41	12.6	14,231	14.7
Total	2,097	100	685,989	100	1,685	100	556,386	100	86	100	32,935	100	326	100	96,668	100
Applicant Income																
Low (0-49% of Median)	24	1.1	4,822	0.7	6	0.4	1,107	0.2	2	2.3	497	1.5	16	4.9	3,218	3.3
Moderate (50-79% of Median)	143	6.8	25,808	3.8	90	5.3	17,302	3.1	5	5.8	811	2.5	48	14.7	7,695	8.0
Middle (80-119% of Median)	372	17.7	100,270	14.6	298	17.7	83,466	15.0	17	19.8	4,227	12.8	57	17.5	12,577	13.0
Upper (>=120% of Median)	1,446	69.0	513,672	74.9	1,201	71.3	427,099	76.8	55	64.0	18,597	56.5	190	58.3	67,976	70.3
Income Not Available	112	5.3	41,417	6.0	90	5.3	27,412	4.9	7	8.1	8,803	26.7	15	4.6	5,202	5.4
Total	2,097	100	685,989	100	1,685	100	556,386	100	86	100	32,935	100	326	100	96,668	100
Tract/BNA Characteristics																
Substantially Minority	2,052	97.9	668,749	97.5	1,645	97.6	541,427	97.3	85	98.8	32,585	98.9	322	98.8	94,737	98.0
Not Substantially Minority	45	2.1	17,240	2.5	40	2.4	14,959	2.7	1	1.2	350	1.1	4	1.2	1,931	2.0
Total	2,097	100	685,989	100	1,685	100	556,386	100	86	100	32,935	100	326	100	96,668	100
Low (0-49% of Median)	24	1.1	4,822	0.7	6	0.4	1,107	0.2	2	2.3	497	1.5	16	4.9	3,218	3.3
Moderate (50-79% of Median)	143	6.8	25,808	3.8	90	5.3	17,302	3.1	5	5.8	811	2.5	48	14.7	7,695	8.0
Middle (80-119% of Median)	372	17.7	100,270	14.6	298	17.7	83,466	15.0	17	19.8	4,227	12.8	57	17.5	12,577	13.0
Upper (>=120% of Median)	1,446	69.0	513,672	74.9	1,201	71.3	427,099	76.8	55	64.0	18,597	56.5	190	58.3	67,976	70.3
NA	112	5.34	41,417	6.04	90	5.34	27,412	4.93	7	8.14	8,803	###	15	4.60	5,202	5.38
Total	2,097	100	685,989	100	1,685	100	556,386	100	86	100	32,935	100	326	100	96,668	100
Low/Mod and/or Sub Minority	2,052	97.9	668,749	97.5	1,645	97.6	541,427	97.3	85	98.8	32,585	98.9	322	98.8	94,737	98.0
All Other Census Tracts	45	2.1	17,240	2.5	40	2.4	14,959	2.7	1	1.2	350	1.1	4	1.2	1,931	2.0
Total	2,097	100	685,989	100	1,685	100	556,386	100	86	100	32,935	100	326	100	96,668	100
Applicant Sex																
Male	734	35.0	234,558	34.2	595	35.3	191,724	34.5	22	25.6	7,147	21.7	117	35.9	35,687	36.9
Female	422	20.1	131,160	19.1	323	19.2	103,691	18.6	27	31.4	7,577	23.0	72	22.1	19,892	20.6
Joint	854	40.7	285,452	41.6	711	42.2	242,783	43.6	33	38.4	10,591	32.2	110	33.7	32,078	33.2
Not Applicable	87	4.1	34,819	5.1	56	3.3	18,188	3.3	4	4.7	7,620	23.1	27	8.3	9,011	9.3
Total	2,097	100	685,989	100	1,685	100	556,386	100	86	100	32,935	100	326	100	96,668	100

Sources: CLC Compliance Technologies, Inc., Lending Patterns, Federal Financial Institutions Examination Council, July 2019, Home Mortgage Disposition Act (HMDA) data, 20012



Table 3-9 presents home purchasing loans denial rates in Jurupa Valley, compared with Riverside, San Bernardino, Orange and Los Angeles Counties. The information in this table includes total number of loans, loan amounts, and denial rates by race and ethnicity. A further analysis of this data is presented in **Table 3-10**. Compared to the four-county region, Jurupa Valley had higher denial loan rates. In Jurupa Valley, 15.5 percent of all purchase loans are denied. Whereas, in Riverside County the figure was 12.0 percent, or 3.5 percent lower than Jurupa Valley. Other nearby counties had a similar denial rates as Riverside County. In Jurupa Valley, the Black/African American denial rate was 27.5 percent in 2017, compared to 16.2 percent in Riverside County. Hispanics, which make up almost 70 percent of the City, had a denial rate of 15.0 percent, about 3.6 higher than Riverside County, though slightly lower than the City of Jurupa Valley overall denial rate. In Riverside and surrounding counties, the denial rate for Hispanics ranged from 12.4 in Riverside County to 17.5 percent in Orange County. Asian denial rates were 13.5 percent in Jurupa Valley, comparable to Riverside County's 13.0 figure, and the denial rate for the White population group was 14.2 percent, approximately 3 percent higher than the Riverside County median.



**Table 3-9
Home Purchase Loans Comparison with Counties (2017)**

Loan Category	Jurupa Valley				Riverside County				San Bernardino County				Orange County				Los Angeles County				
	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	Tot	%	Den.	%	
Loan Purpose and Type																					
Purchase - Conventional	1,637	78.1	285	87.4	26,667	62.9	3,470	67.9	20,320	63.3	2,641	67.0	31,035	88.8	3,697	90.0	66,208	80.6	7,908	81.0	
Purchase - Government	460	21.9	41	12.6	15,728	37.1	1,638	32.1	11,773	36.7	1,300	33.0	3,909	11.2	410	10.0	15,901	19.4	1,857	19.0	
Total	2,097	100	326	100	42,395	100	5,108	100	32,093	100	3,941	100	34,944	100	4,107	100	82,109	100	9,765	100	
Applicant Race																					
American Indian/Alaska Native	9	0.4	2	0.6	291	0.7	55	1.1	216	0.7	25	0.6	88	0.3	15	0.4	306	0.4	44	0.5	
Asian	539	25.7	73	22.4	3,504	8.3	454	8.9	4,365	13.6	484	12.3	9,965	28.5	1,106	26.9	15,131	18.4	1,511	15.5	
Black or African American	80	3.8	22	6.7	2,117	5.0	344	6.7	1,592	5.0	286	7.3	294	0.8	59	1.4	3,474	4.2	588	6.0	
Hawaiian / Pacific Islander	14	0.7	1	0.3	321	0.8	46	0.9	194	0.6	18	0.5	166	0.5	23	0.6	508	0.6	69	0.7	
White	1,172	55.9	167	51.2	30,158	71.1	3,306	64.7	21,734	67.7	2,474	62.8	18,658	53.4	2,204	53.7	47,129	57.4	5,577	57.1	
2 or More Minority Races	2	0.1	0	-	55	0.1	5	0.1	44	0.1	5	0.1	32	0.1	5	0.1	106	0.1	15	0.2	
Joint Race (White/Minority)	43	2.1	4	1.2	1,136	2.7	121	2.4	670	2.1	79	2.0	1,175	3.4	113	2.8	2,242	2.7	245	2.5	
Race Not Available	238	11.3	57	17.5	4,813	11.4	777	15.2	3,278	10.2	570	14.5	4,566	13.1	582	14.2	13,213	16.1	1,716	17.6	
Total	2,097	100	326	100	42,395	100	5,108	100	32,093	100	3,941	100	34,944	100	4,107	100	82,109	100	9,765	100	
Applicant Ethnicity																					
Hispanic or Latino	799	38.1	120	36.8	12,450	29.4	1,544	30.2	11,641	36.3	1,438	36.5	3,216	9.2	562	13.7	17,724	21.6	2,357	24.1	
Not Hispanic or Latino	1,050	50.1	158	48.5	23,877	56.3	2,712	53.1	16,492	51.4	1,933	49.0	26,502	75.8	2,948	71.8	50,072	61.0	5,762	59.0	
Joint (Hisp/Lat / Not Hisp/Lat)	73	3.5	10	3.1	1,802	4.3	202	4.0	1,239	3.9	132	3.3	1,074	3.1	93	2.3	2,266	2.8	255	2.6	
Ethnicity Not Available	175	8.3	38	11.7	4,266	10.1	650	12.7	2,721	8.5	438	11.1	4,152	11.9	504	12.3	12,047	14.7	1,391	14.2	
Total	2,097	100	326	100	42,395	100	5,108	100	32,093	100	3,941	100	34,944	100	4,107	100	82,109	100	9,765	100	

Sources: CLC Compliance Technologies, Inc., Lending Patterns, Federal Financial Institutions Examination Council, July 2019, Home Mortgage Disposition Act (HMDA) data, 2001



Table 3-10
Home Purchase Loans Denials by Race Comparison with Counties (2017)

Race/Ethnicity	Jurupa Valley	Riverside County	San Bernardino County	Orange County	Los Angeles County
	% of Tot.	% of Tot.	% of Tot.	% of Tot.	% of Tot.
Total - Purchase Loans	15.5%	12.0%	12.3%	11.8%	11.9%
Applicant Race					
American Indian/Alaska Native	22.2%	18.9%	11.6%	17.0%	14.4%
Asian	13.5%	13.0%	11.1%	11.1%	10.0%
Black or African American	27.5%	16.2%	18.0%	20.1%	16.9%
Hawaiian / Pacific Islander	7.1%	14.3%	9.3%	13.9%	13.6%
White	14.2%	11.0%	11.4%	11.8%	11.8%
2 or More Minority Races	0.0%	9.1%	11.4%	15.6%	14.2%
Joint Race (White/Minority)	9.3%	10.7%	11.8%	9.6%	10.9%
Race Not Available	23.9%	16.1%	17.4%	12.7%	13.0%
Total	15.5%	12.0%	12.3%	11.8%	11.9%
Applicant Ethnicity					
Hispanic or Latino	15.0%	12.4%	12.4%	17.5%	13.3%
Not Hispanic or Latino	15.0%	11.4%	11.7%	11.1%	11.5%
Joint (Hisp/Lat / Not Hisp/Lat)	13.7%	11.2%	10.7%	8.7%	11.3%
Ethnicity Not Available	21.7%	15.2%	16.1%	12.1%	11.5%
Total	15.5%	12.0%	12.3%	11.8%	11.9%

Sources: CLC Compliance Technologies, Inc., Lending Patterns, Federal Financial Institutions Examination Council, July 2019, Home Mortgage Disposition Act (HMDA) data, 2001

Regarding African American denial rates - given the large difference of 11.3 percent between Jurupa Valley and the Riverside County figures for 2017, additional research was completed. Citywide, in terms of African American loans, the proportion of loans made to African Americans in Jurupa Valley (3.8%) was higher than the City's African American population (3.0%).

At the Census Tract level, denial rates for African Americans over the 2013-17 five-year period was reviewed, and presented in **Table 3-11**. Over the 2013-17 five-year period, the denial rate was 21.5 percent for African Americans in Jurupa Valley. There were eight Census Tracts during the past five years that did not have any loan denials to African Americans. Three other Census Tracts had denial rates below the City's average. However, there were two Census Tracts that had almost half of all the African American loan denials; Census Tract 402.02 (8 of 11 loans, 72.7% of loans were denied) and Census Tract 406.07 (25 of 104 loans, 24.0% of loans were denied). **Figure 3-1** shows the African American Denial Rates-Census Tracts 402.02 and 406.07 (2013-2017). Both of these Census Tracts are located in areas of Jurupa Valley that do not have high concentrations of minority populations. **Figure 3-2** shows the Census Tracts with high denial rates in a Jurupa Valley map with African American concentrations.



**Table 3-11
African American Home Purchase Loans Denials (2013-2017)**

Tract Num.	Income	Total	Denial	% Denial
401.01	Middle	11	5	45.5%
401.02	Middle	6	-	0.0%
402.01	Middle	13	-	0.0%
402.02	Middle	11	8	72.7%
402.03	Low	3	-	0.0%
402.04	Mod	1	-	0.0%
403.01	Low	7	2	28.6%
403.02	Upper	11	2	18.2%
403.03	Middle	12	3	25.0%
404.02	Middle	3	1	33.3%
404.03	Middle	1	-	0.0%
404.04	Middle	11	-	0.0%
404.05	Upper	9	1	11.1%
405.01	Middle	5	4	80.0%
405.02	Mod	4	2	50.0%
405.03	Mod	3	-	0.0%
406.03	Mod	6	4	66.7%
406.04	Upper	17	3	17.6%
406.05	Mod	1	1	100.0%
406.07	Upper	104	25	24.0%
406.15	Upper	46	5	10.9%
406.16	Upper	33	3	9.1%
407.03	Upper	3	-	0.0%
Total		321	69	21.5%

Sources: CLC Compliance Technologies, Inc., Lending Patterns, Federal Financial Institutions Examination Council, July 2019, Home Mortgage Disposition Act (HMDA) data, 2001

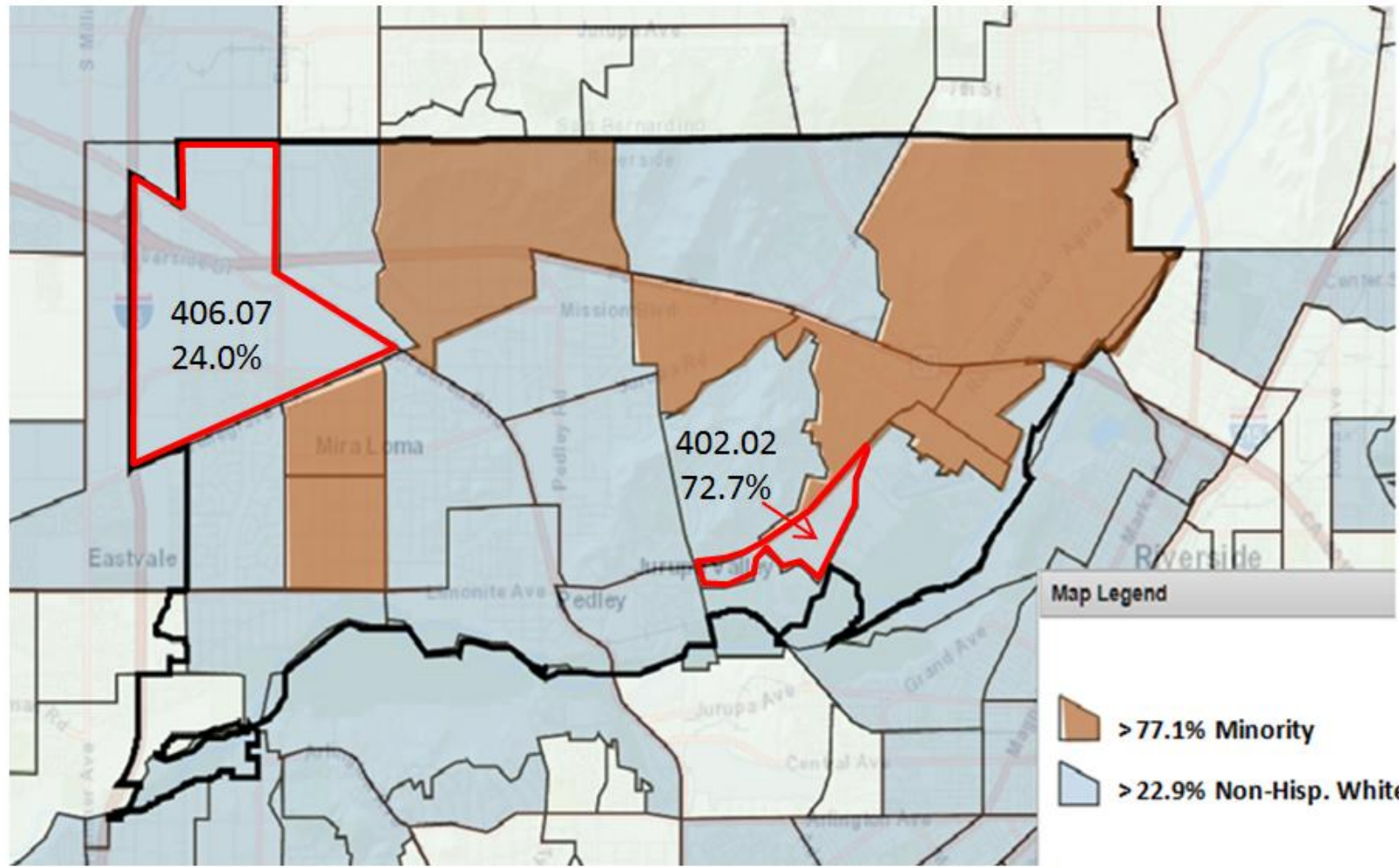


Figure 3-1
African Amer. Denial Rates-CT 406.07 & 402.02-Minority Pop. (2013-2017)

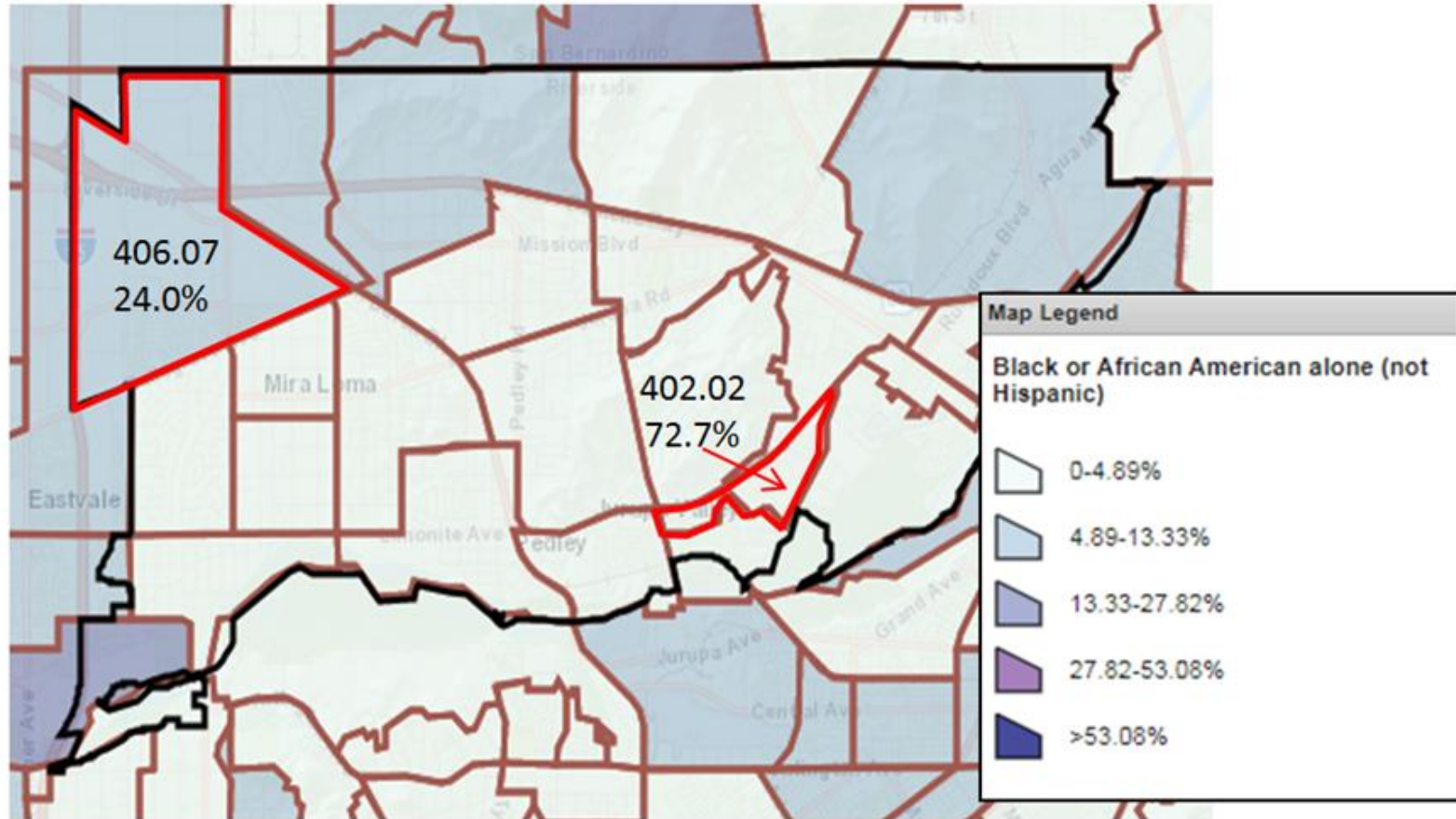


Figure 3-2
African Amer. Denial Rates -CT 406.07 & 402.02-Afr. Am. Pop. (2013-2017)



Lending Practices

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 credit 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 nontraditional credit sources, might otherwise be 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 have 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 the past decade, however, many large and well-known banks became involved in the subprime market either through acquisitions of other firms or by initiating loans that were subprime directly.

Most subprime loans provide families with payments for the first few years at a low “teaser” rate. After that, the loans reset every six months or year to a higher, fully indexed rate, which can cost borrowers hundreds of extra dollars each month. This extra expense has increased the housing cost burden of many families and for many has ultimately resulted in foreclosure.

Predatory Lending

With an active housing market, potential predatory lending practices by financial institutions may arise. Predatory lending involves abusive loan practices usually targeting minority homeowners or those with less-than-perfect credit histories. The predatory practices typically include high fees, hidden costs and unnecessary insurance and larger repayments due in later years. One of the most common predatory lending practices is placing borrowers into higher interest rate loans than called for by their credit status. Although the borrowers may be eligible for a loan in the “prime” market, they are directed into more expensive and higher fee loans in the “subprime” market. In other cases, fraudulent appraisal data is used to mislead homebuyers into purchasing overvalued homes, or fraudulent or misrepresented financial data is used to encourage homebuyers into assuming a larger loan than can be afforded. Both cases almost inevitably result in foreclosure.



In recent years, predatory lending has also penetrated the home improvement financing market. Seniors and ethnic minority homeowners are the usual targets. In general, home improvement financing is more difficult to obtain than home purchase financing. Many homeowners have a debt-to-income ratio that is too high to qualify for home improvement loans in the prime market and become targets of predatory lending in the subprime market. Seniors are often swindled into installing unnecessary devices or making unnecessary improvements that are bundled with unreasonable financing terms.

Predatory lending is a growing fair housing issue. Predatory as well as discriminatory lending is addressed under the Fair Housing Act of 1968, which requires equal treatment in terms and conditions of housing opportunities and credit regardless of race, religion, color, national origin, family status or disability. This applies to loan originators as well as the secondary market. The Equal Credit Opportunity Act of 1972 requires equal treatment in loan terms and availability of credit for all of the above categories, as well as age, sex and marital status. Lenders that engage in predatory lending would violate these acts if they were to target ethnic minority or elderly households to buy higher-priced and unequal loan products, treat loans for protected classes differently than those of comparably creditworthy White applicants, or have policies or practices that have a disproportionate effect on the protected classes.

Data available to investigate the presence of predatory lending are extremely limited. At present, HMDA data are the most comprehensive available for evaluating lending practices. However, as discussed before, the HMDA data lack the financial details of the loan terms to conclude any kind of predatory lending. Efforts at the national level are pushing for increased reporting requirements in order to curb predatory lending.

Predatory lending and unsound investment practices, which are central to the current home foreclosure crisis, have resulted in a credit crunch that has spread well beyond the housing market and is now affecting the cost of credit for local government borrowing, as well as local property tax revenues. To curb the future negative impact of predatory lending, in June 2009 the governor of California signed into law Assembly Bill 260, reforming mortgage lending and specifically banning predatory lending practices. The legislation created a fiduciary duty standard for mortgage brokers, eliminated compensation incentives that encourage the steering of borrowers into risky loans and established regulations on prepayment penalties.⁵

⁵*State of California AB 260*



4. Public Policies and Practices

Public policies established at the state, regional and local levels can affect housing development and therefore the range of housing choices available to residents. This section discusses the various public policies that could influence fair housing choice in the City of Jurupa Valley.

City Policies and Programs Affecting Housing Development

The Jurupa Valley General Plan, Zoning Ordinance, 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 and occupancy codes.
- Provision for a variety of housing types.
- Public and administrative policies affecting housing activities.
- Moratoriums or growth management plans.
- Residential development review process and fees.
- Community representation on planning boards and commissions.

Local Zoning, Building and Occupancy Codes

Land Use and Zoning Controls

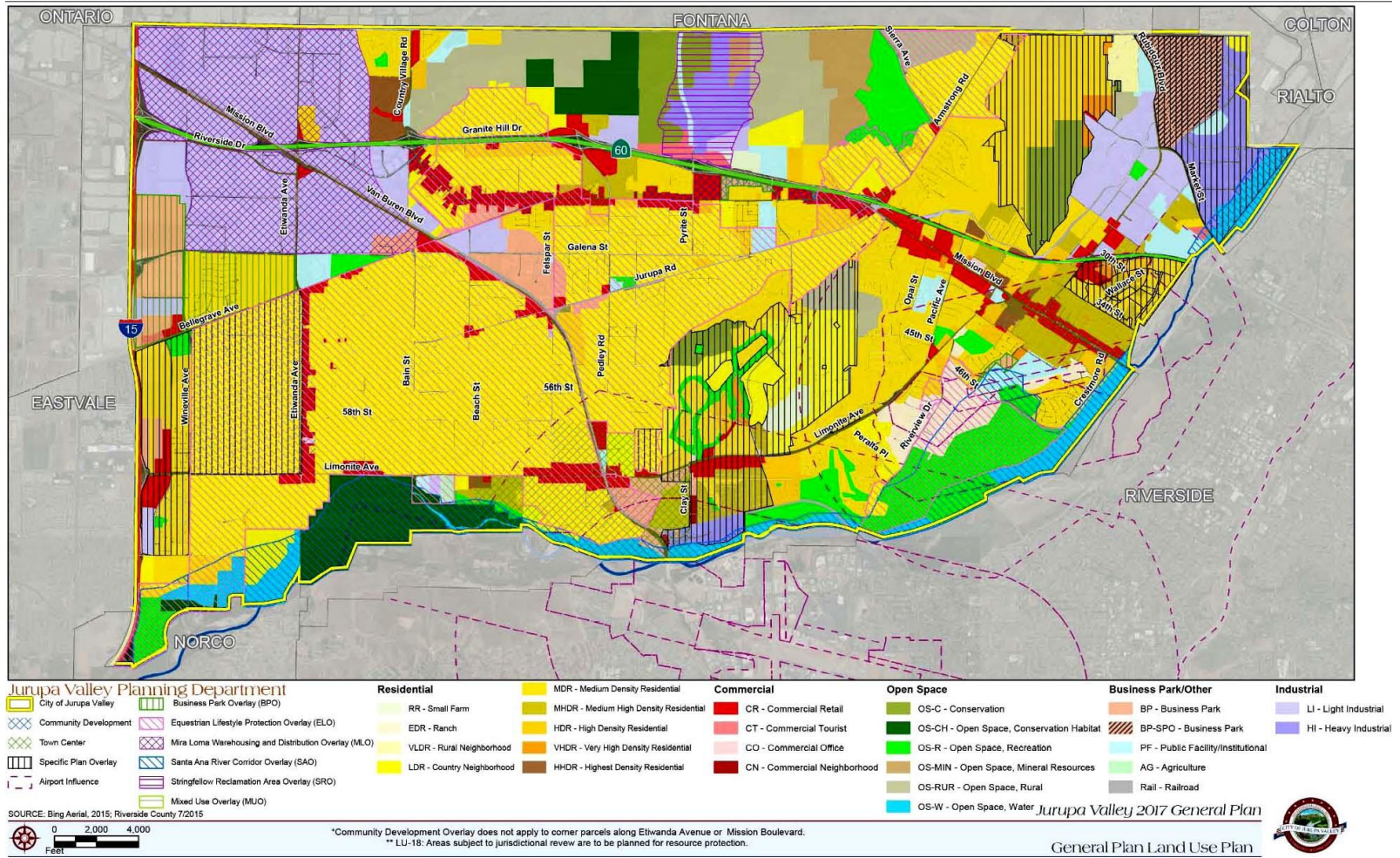
The City's policies for development are set forth in the Land Use Element of the City's General Plan, which was adopted by the City on September 7, 2017. The Land Use Element identifies the location, distribution, and density of land uses throughout the City which are implemented through its corresponding Zoning Districts. As presented in **Table 4-1**, Jurupa Valley's Land Use Element establishes nine residential land uses. Three of these are rural designations with very low density (1- to 5-acre minimums). The remaining six categories range from Country Neighborhood (LDR) of 2 dwelling units per acre (DU/Ac) to Highest Density Residential (HHDR) of 25 DU/Ac. These designations provide a range of low to high density development opportunities. In addition, the Land Use Element has a Town Center Overlay (TCO) and Mixed Use Overlay (MUO) that allows for residential uses as seen in the table below. **Figure 4-1** shows the 2017 General Plan Land Use Map.



**Table 4-1
Residential Land-Use Designations**

General Plan Land Use Designation	Density (units/acre)	Description
Small Farm (RR)	1 unit/5 acres	Single-family detached residence on parcels of at least 5 acres
Ranch (EDR)	1 unit/2 acres	Single-family detached residence on parcels of at least 2 acres
Rural Neighborhood (VLDR)	1 unit/1 acre	Single-family detached residences on parcels of 1 to 2 acres
Country Neighborhood (LDR)	1 to 2	Single-family detached residences on parcels of ½ to 1 acre
Medium Density Residential (MDR)	2 to 5	Single-family attached and detached residences
Medium-High Density Residential (MHDR)	5 to 8	Single-family attached and detached residences
High Density Residential (HDR)	8 to 14	Single-family attached and detached residences
Very High Density Residential (VHDR)	14 to 20	Single-family attached residences and all types of multi-family dwellings
Highest Density Residential (HHDR)	20 to 25	Multi-family dwellings, includes apartments and condominiums
Mixed Use Overlay (MUO)	8 to 20	Allows a mix of uses. Flexible residential density and development standards are applied.
Town Center Overlay (TCO)	5 to 25	Applied to three historic core areas. Promotes infill and improvement of established town centers.

Source: City of Jurupa Valley General Plan 2017



North

 Source: City of Jurupa Valley - 2017 General Plan

Figure 4-1
2017 General Plan Land Use Map



Upon incorporation as a city in 2011, Jurupa Valley adopted the Riverside County Zoning Code by reference. **Table 4-2** summarizes the City’s residential zoning districts and their development standards, as established in the County Zoning Code adopted by the City. The City will be comprehensively updating its Zoning Code in 2020 to implement its General Plan and to address recent changes in State housing law. The following section identifies several sections of the Code to be amended to better facilitate the provision of a variety of housing types to meet the diverse needs of Jurupa Valley residents.

**Table 4-2
Residential Development Standards**

Zoning District	Min Lot Size	Minimum Lot			Max Building Height (stories/ Feet)	Min Front Yard (feet)	Min Interior Side Yard (feet)	Min Corner Side Yard (feet)	Min Rear Yard (feet)	Lot Coverage
		Width (feet)	Depth (feet)	Frontage (feet)						
RR	21,780	80	---	---	40-50	---	---	---	---	---
R-1/R-1A	7,200	60	100	60	3-story/ 40	20	10% of lot width	10	10	50%
R-A	20,000	100	150	---	40-50	20	---	---	---	---
R-2	7,200	---	---	---	3-story/ 40	20	10% of lot width	10	10	60%
R-2A	7,200	---	---	---	2-story/ 30	20	5	---	10	60%
R-3	7,200	60	100	---	50-75	10	5	10	10	50%
R-3A	9,000	---	---	---	50-75	10	5	10	10	50%
R-4	3,500	40	80	---	40-50	20	5	10	10	---
R-5	None	n/a	n/a	n/a	50-75	50	50	50	50	---
R-6	5,000	---	---	30	35-50	10	---	---	10	---
R-T	3,600/ 7,200	40/60	100	30/45	40	20	5	5	5	---
PUD	---	---	---	---	---	10	5	10	10	varies

Source: City of Jurupa Valley General Plan 2017

The governmental factor that most directly influences the supply and cost of housing is permitted densities, with higher-density housing reducing land costs on a per-unit basis and thus facilitating the development of affordable housing. Although 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 persons of color. When the availability of affordable housing is limited, this indirectly affects the housing choices available to groups protected by fair housing laws.

Based on an analysis of affordable housing development in Western Riverside County and discussions with local developers, the City of Jurupa Valley has determined that a base density of 25 units/acre is appropriate to accommodate the City’s lower income housing needs (*source: Jurupa Valley Housing Element, March 2019*). While both the HHDR and Town Center Overlay land use designations permit densities of 25 units/acre, the City currently has a shortfall of land designated at these densities to address its regional housing needs for 438 very low income units. To address this remaining need for very low income units, the adopted Housing Element commits the City to designating 16 additional acres of HHDR land, along with programs to work with the Riverside County Housing Authority, housing non-profits and housing developers to identify specific sites for developing housing suitable to very low income households, including seniors, disabled persons, veterans, farm workers and the homeless.

Parking Requirements

When parking requirements are high, housing development costs tend to increase, restricting the range of housing types available in a community. For single-family developments, Jurupa Valley’s zoning ordinance requires the standard two covered parking spaces, with multi-family parking requirements varying depending on the number of bedrooms. Studio and one-bedroom units require just 1.25 parking spaces, two-bedroom units require 2.25 spaces, and three-bedroom units require 2.75 spaces. For multi-family housing, senior citizen housing, and planned residential developments, just one of the required spaces per units is required to be in a garage or carport. And pursuant to State law, second dwelling units are required to have one space per bedroom, and are exempt from parking if located within one-half mile of transit. **Table 4-3** provides further details regarding parking for residential development.

**Table 4-3
Residential Parking Standards**

Type of Residential Development	Required Parking Spaces (off street)
1. Single family dwelling unit	Two spaces per dwelling unit
2. Multi family dwelling unit	Studio or 1 BR: 1.25 spaces per unit 2 BD: 2.25 spaces per unit 3 BD: 2.75 spaces per unit (add 1 space per employee) PRD: 1.5 spaces per unit
3. Planned Residential Development	1 BR: 1.5 space per unit 2 BR or more: 2.5 spaces per unit
4. Senior Housing	See Single-Family and Multi-Family requirements
5. Mobile Home Parks	Two spaces per trailer or mobile home space* (add guest space per 8 mobile home spaces)
6. Second Units	1 BR: 1 space* per unit 2 BR: 2 spaces* per unit
Sources: City of Jurupa Valley General Plan 2017, City of Jurupa Valley Municipal Code Section 9.240.120 * Parking spaces may be tandem.	



Inclusionary Housing

Inclusionary housing is a policy ensuring that a portion of new housing units are reserved for working persons of modest means who already live in or wish to move to the community, such as teachers, police and fire personnel, health care workers, sales clerks, and administrative support staff. Jurupa Valley intends to work with Riverside County to continue and update an existing Inclusionary Housing Program (IHP) previously administered by the County of Riverside. The IHP will help ensure that a portion of new housing units are affordable to working-class residents with incomes up to 50 percent of the area-wide median income (AMI), which is about \$36,000 for a four person household in Riverside County in 2019. This program requires that 1 out of every 25 new units (4%) be reserved for households at the 50 percent AMI income level. Projects of six or more units are required to participate in the program. These affordable units must be provided on-site, offsite, or through the payment of an in-lieu fee. These fees are combined with other sources of funds, such as Low Income Tax Credit funding, and are used to assist in providing additional affordable housing opportunities in the City. The program is not expected to significantly affect market rate housing projects and will, at the same time, contribute towards addressing the City's regional housing need.

Density Bonus

California Government Code §65915 requires local governments to grant a density bonus of at least 20% (5% for condominiums) and an additional incentive, or financially equivalent incentive(s), to a developer of a residential project that agrees to provide at least:

- 10% of the units for lower income households;
- 5% of the units for very low income households;
- 10% of the condominium units for moderate income households;
- A senior citizen housing development; or
- Qualified donations of land, condominium conversions, and childcare facilities.

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

- An additional 2.5% density bonus for each additional increase of 1% in the number of Very Low income units above the initial 5% threshold;
- A density increase of 1.5% for each additional 1% increase in the number of Low income units above the initial 10% threshold; and
- A 1% density increase for each 1% increase in the number of Moderate income units above the initial 10% threshold.

These bonuses reach a maximum density bonus of 35% when a project provides 11% very-low income units, 20% low-income units, or 40% moderate income units. In addition to a density



bonus, at the discretion of the approving jurisdiction, developers may also be eligible for one of the following concessions or incentives:

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

Jurisdictions may not impose any development (or density) standard that, by itself, would preclude the construction of a project with the density bonus and the incentives or concessions to which the developer is entitled. To achieve compliance with the state density bonus law, jurisdictions must reevaluate their development standards in relation to the maximum achievable densities for multifamily housing.

State density bonus law also specifies alternative parking standards which may be utilized at the request of the developer; use of these standards does not count towards a project's development incentives/concessions. These reduced parking standards are inclusive of guest parking and handicapped parking, may be tandem and/or uncovered, and are applicable to the entire development project.

- Zero to one bedroom: one on-site parking space
- Two to three bedrooms: two on-site parking spaces
- Four or more bedrooms: two and one-half on-site parking spaces

AB 2222 (effective January 2015), made important changes to State density bonus law in an effort to help address potential displacement of existing tenants. Specifically, AB 2222 now prohibits an applicant from receiving a density bonus (and related incentives and waivers) unless the proposed housing development would maintain the number and proportion of affordable housing units within the proposed development, including affordable dwelling units that have been vacated or demolished in the five-year period preceding the application. AB 2222 also increases the required affordability from 30 years or longer to 55 years and requires replacement rental units to be subject to a recorded affordability restriction for at least 55 years. If the units that qualified an applicant for a density bonus are affordable ownership units, they must be subject to an equity sharing model rather than a resale restriction.

AB 744, signed into law in October 2015, further amends density bonus law to provide additional by-right reductions in parking for density bonus projects. Specifically, for density bonus projects which include the maximum percentage of low income or very low income units (20% and 11%, respectively) and located within one-half mile of a major transit stop with "unobstructed access", upon the request of the developer, the jurisdiction shall not impose a vehicular parking ratio, inclusive of handicapped and guest parking, that exceeds 0.5 spaces per bedroom. Senior



rental housing and housing for special needs populations also qualify for by-right parking reductions when either paratransit service is provided, or unobstructed access to a fixed bus route service that operates at least eight times per day is available within one-half mile.

Jurupa Valley will be undertaking a comprehensive update to its Zoning Code beginning in 2020. As part of this update, the City will amend its provisions for density bonuses to provide consistency with current state law and the City's adopted Housing Element policies.

Building Codes

Building and safety codes are adopted to preserve public health and safety, and ensure the construction of safe and decent housing. These codes and standards also have the potential to increase the cost of housing construction or maintenance. The City of Jurupa Valley has adopted the latest edition of the California Building Standards Code. Other codes commonly adopted by reference within the region include the California Mechanical Code, the California Plumbing Code, the California or National Electric Code, the Uniform Housing Code, and the California Fire Code. The City has not adopted any local amendments that constrain the development, maintenance, or preservation of housing.

The City's building codes require that new residential construction comply with the American with Disabilities Act (ADA) per federal law. ADA regulations include requirements for a minimum percentage of units in new developments to be fully accessible to the physical disabled.

The City of Jurupa Valley has established a Code Enforcement program to ensure a high quality of life throughout the communities and maintain property values. Code compliance in the City is a responsive program under which property inspections are done only when inspection requests and complaints are received. Such a system may result in under-reporting of code compliance issues, particularly with regard to the rental housing stock. Often, tenants fear retaliation from the landlords and are therefore less willing to report an issue. Legal residency issues or language barriers may be another obstacle for reporting code compliance issues.

Occupancy Standards

Local occupancy standards more stringent than those established by the State have been deemed unconstitutional by the courts. All California jurisdictions are mandated to follow the occupancy standards established under the State Uniform Housing Code (UHC). The UHC requires that every dwelling, except studio apartments, have one room with at least 120 square feet of floor area. Two persons are permitted to use a room for sleeping purposes if it has a total area of not less than 70 square feet. When more than two persons occupy a room, the required floor area must be increased by 50 square feet per occupant. The UHC is based on health and safety considerations, and is not intended to discriminate based on familial status. The Jurupa Valley Zoning Ordinance does not contain residential occupancy standards.



Variety of Housing Opportunity

Through its zoning powers, Jurupa Valley provides development opportunities for a variety of housing types to promote diversity in housing price and style to meet the needs of its residents. Some of these housing types include single-family, multi-family, second dwelling units, manufactured homes, mobile home parks, licensed community care facilities, employee housing for seasonal or migrant workers, assisted living facilities, emergency shelters, supportive housing, transitional housing, and single room occupancy (SRO) units. **Table 4-4** summarizes the housing types permitted in each of the Jurupa Valley zoning districts where residential uses are permitted. Additional information about these housing types are included below.

Single- and Multi-Family Uses. One-family dwellings are permitted uses in most residential zones. Multi-family dwellings are permitted in the R-4 zone, as well as the R-2, R-3, and R-6 zones with the approval of a Site Development Permit. The Site Development Permit process is a discretionary review process that differs from conditional use permit review in that it is strictly concerned with design and the application of conditions to address traffic safety, parking, noise and other standards, not land use or compatibility. Conditions of approval may be imposed that must be met prior to or concurrent with project development. However, Site Development Permits are less costly and processed more quickly than conditional use permits. Site Development Permits for residential projects are typically acted upon by the Planning Director and generally do not require Planning Commission approval, except for special cases such as cellular sites and detached accessory structures.

Manufactured Housing. State law requires local governments to permit manufactured and mobile homes meeting federal safety and construction standards on a permanent foundation (and permanently connected to water and sewer utilities, where available), in all single-family residential zoning districts (§65852.3 of the *California Government Code*). For purposes of permit issuance, Jurupa Valley permits mobile homes on a foundation system on all lots zoned to permit single family dwellings. The installation of manufactured homes not on foundations is allowed whenever it is specifically provided for in the various zone classifications, and is subject to the requirements and standards set forth in those zones. A mobile home permitted in the R-R and R-A zones, however, is subject to additional development standards regarding minimum floor area and lot size. These requirements are standard for most California jurisdictions and are similar to those of Riverside County.



**Table 4-4
Jurupa Valley Permitted Uses by Zone**

Zoning District	One-Family Dwelling	Multiple Family Dwelling	Second Units	Congregate Care Facilities	Emergency Shelter	Transitional/ Supportive Housing	Farm Worker Housing	Employee Housing	SRO	Manufactured Housing/ Mobile-Home	Mobile-Home Park	Planned Residential Development
R-R/R-RO	P	NP	P	NP	NP	P	NP	NP	NP	P	CUP	P#
R-1/R-1A	P	NP	P	NP	NP	P	NP	NP	NP	P	CUP	P#
R-A	P	NP	P	NP	NP	P	NP	NP	NP	P	CUP	P#
R-2	P	P*	P	P*	NP	P	NP	P*	P*	P	CUP	P#
R-2A	P	P*	P	P*	NP	P	NP	P*	P*	P	CUP	P#
R-3	P*	P*	P	P*	NP	P	NP	P*	P*	P	CUP	P#
R-3A	P	NP	P	NP	NP	P	NP	NP	NP	P	CUP	P#
R-T	P	NP	P	NP	NP	P	NP	P*	P*	P	CUP	P#
R-T-R	P	NP	P	NP	NP	P	NP	NP	NP	P		P#
R-4	P*	P*	P	P*	NP	P	NP	P*	P*	P	CUP	P#
R-6	P	P	P	NP	NP	P	NP	P	P	P	CUP	P#
PUD	PUD	PUD	PUD	PUD	NP	PUD	PUD	PUD	PUD	PUD	PUD	P#
I-P	NP	NP	NP	NP	P	NP	NP	P*	NP	P*	NP	NP
A1	P	NP	P	NP	NP	P	P*	NP	NP	P*	CUP	P#
A-2	P	NP	P	NP	NP	P	P*	NP	NP	P*	CUP	P#
W-2	P	NP	P	NP	NP	P	NP	NP	NP	NP	NP	P#
R-D	P	P*	P	NP	NP	P	NP	NP	NP	P	CUP	P#
N-A	P	NP	P	NP	NP	P	NP	NP	NP	P*	NP	P#

P = Permitted by Right; CUP = Conditional Use Permit; NP = Not Permitted; P* = Site Development Permit; P# = Requires PC/CC review; PUD = Allowed with PUD; rezoning required

Notes: 1. Transitional and Supportive housing subject to same requirements that apply to standard residential uses.

2. Employee housing for six or fewer persons is treated as a single-family structure and residential use.

Source: City of Jurupa General Plan 2017



Residential Care Facilities. The Lanterman Developmental Disabilities Services Act (§5115 and §5116 of the *California Welfare and Institutions Code*) declares that mentally and physically disabled persons are entitled to live in normal residential surroundings. The use of property for the care of six or fewer mentally disordered or otherwise handicapped persons is required by law. A state-authorized, certified, or authorized family care home, foster home, or group home serving six or fewer persons with disabilities or dependent and neglected children on a 24-hour a-day basis is considered a residential use to be permitted in all residential zones. No local agency can impose stricter zoning or building and safety standards on these homes (commonly referred to as “group” homes) for six or fewer persons than are required of other permitted residential uses in the zone. The Lanterman Act covers only licensed residential care facilities.

The City of Jurupa Valley defines congregate care residential facilities as “a housing arrangement, developed pursuant to Article XIX of the Zoning Code, where nonmedical care and supervision are provided, including meals and social, recreational, homemaking and security services.” Congregate care facilities are currently permitted in the R-2, R-3 and R-4 zones, subject to approval of a Conditional Use Permit. The Code does not currently contain explicit provisions for small (6 or fewer) residential care facilities, and is thus does not currently comply with the Lanterman Act. As part of the comprehensive Zoning Code update, the City will amend its provisions for licensed residential care facilities to ensure consistency with the Lanterman Act.

Emergency Shelters. An emergency shelter is a facility that provides temporary shelter and feeding of indigents or disaster victims, operated by a public or non-profit agency. State law requires jurisdictions to identify adequate sites for housing that will be made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all income levels, including emergency shelters and transitional housing (§65583(c)(1) of the *California Government Code*). State law (SB 2) requires that local jurisdictions make provisions in their zoning codes to permit emergency shelters by right in at least one zoning district where adequate capacity is available to accommodate at least one year-round shelter. Local jurisdictions may establish standards to regulate the development of emergency shelters.

Jurupa Valley permits emergency shelters in its Industrial Park (I-P) zone, subject to the development standards allowed under SB 2, such as minimum floor area for each client, minimum interior waiting and client intake areas, off-street parking and outdoor lighting requirements, and the requirement for an on-site manager and at least one additional staff member to be present on-site during hours of operation. The City has a number of large, vacant I-P zoned sites totaling 290 acres. Upon incorporation, the City adopted the Riverside County Zoning Code by reference. The County Zoning Code contains distance requirements for emergency shelters that extend beyond the basic 300-foot distance between two shelters as permitted by SB 2. The City will remove the distance requirement as part of the Zoning Code update.

Transitional and Supportive Housing. State law (SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing. Under Housing Element law, transitional housing means buildings configured as rental housing developments, but operated under



program requirements that require the termination of assistance and reassignment of the assisted unit to another eligible program participant at a predetermined future point in time that shall be no less than 6 months from the beginning of the assistance (*California Government Code* §65582(h)). For example, a multi-family dwelling that is designated as a temporary (typically 6 months to 1 year) residence for abused women and children, pending relocation to more permanent housing.

Supportive housing means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or off-site service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. Target population means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 commencing with §4500 of the *Welfare and Institutions Code*) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (*California Government Code* §§65582(f) and (g)). Accordingly, state law establishes transitional and supportive housing as residential uses and therefore, local governments cannot treat these uses differently from other similar types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). The City of Jurupa Valley's Zoning Code currently does not include provisions for transitional or supportive housing. The City will include provisions for transitional and supportive housing as part of the Zoning Code update consistent with SB 2, as provided in Program HE 3.1.9 of the City's adopted General Plan.

Single Room Occupancy (SRO). AB 2634 mandates that local jurisdictions address the provision of housing options for extremely low-income households, including Single Room Occupancy units (SRO). SRO units are typically one room units intended for occupancy by a single individual. It is distinct from a studio or efficiency unit, in that a studio is a one-room unit that must contain a kitchen and a bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. There are minimum standards for SROs (including a minimum floor area requirement) under the *California Health and Safety Code*.

The City of Jurupa Valley's Zoning Code does not specifically address SROs. As part of the upcoming Zoning Code update, the City will include provisions to address SRO housing.

Farm Worker and Employee Housing. The California Employee Housing Act requires that housing for six or fewer employees be treated as a regular residential use. In general, the *California Health and Safety Code* §17008(a) defines "employee housing" as "any portion of any housing accommodation, or property upon which a housing accommodation is located, if all of the following factors exist:

- (1) The accommodations consist of any living quarters, dwelling, boardinghouse, tent, bunkhouse, maintenance of-way car, mobile home, manufactured home, recreational vehicle, travel trailer, or other housing accommodations, maintained in one or more buildings or one or more sites, and the premises upon which they are situated or the



area set aside and provided for parking of mobile homes or camping of five or more employees by the employer.

- (2) The accommodations are maintained in connection with any work or place where work is being performed, whether or not rent is involved.” Section 17005 of the *California Health and Safety Code* identifies the few types of employees excluded, and Section 17008 provides a detailed definition of employee housing. The Employee Housing Act further defines housing for agricultural workers consisting of 36 beds or 12 units be treated as an agricultural use and permitted where agricultural uses are permitted.

Section 17005 of the *California Health and Safety Code* identifies the few types of employees excluded, and Section 17008 provides a detailed definition of employee housing. The Employee Housing Act further defines housing for agricultural workers consisting of 36 beds or 12 units be treated as an agricultural use and permitted where agricultural uses are permitted. The City of Jurupa Valley permits agricultural uses in a number of its residential zones, although there are no large-scale agricultural properties or businesses in the City at this time. The Zoning Code does not specifically address farm worker housing in residential zones, but does allow farm worker housing in the City’s agricultural zones (A-1 and A-2) with Site Development Permit approval, and single-family dwellings are permitted by right in these zones. As part of the comprehensive Zoning Code update, the City will amend the Zoning Code to address the requirements of the Employee Housing Act.

Definition of Family

A city’s zoning ordinance can restrict access to housing for individuals living together but failing to qualify as a “family” by the definition specified in the document. Even if the ordinance provides a broad definition, deciding what constitutes a “family” should be avoided by cities to prevent confusion or unintentional restrictiveness. Particularly, when the zoning ordinance uses terms such as single-family homes, defining family in too-detailed terms could restrict access to housing for certain segments of the population.

Jurupa Valley’s Zoning Code defines *family* as “an individual or two or more persons related by blood or marriage, or a group of not more than five persons, excluding servants, who are not related by blood or marriage, living together as a single housekeeping unit in a dwelling unit.” There are a number of state and federal rules that govern the definition of family, including the Federal Fair Housing Amendments Act of 1988, the California Fair Housing and Employment Act, the California Supreme Court case, *City of Santa Barbara v Adamson* (1980), and the California Constitution privacy clauses that have prompted redefining *family*. Many traditional zoning definitions of *family* required household members to be related; however, this definition discriminated against disabled persons sharing housing, and also against other unrelated persons living together, even though related individuals with similar household sizes were allowed to live together. Pursuant to the City’s General Plan Program HE 3.1.9, this definition will be amended to remove: 1) any reference to the number of persons that can be considered a “family,” and 2) any reference to how members of a “family” are to be related. This amendment will be processed as part of the comprehensive Zoning Code update.



Zoning Provisions for Accessory Dwelling Units (“Second” Units)

Accessory dwelling units, or ADUs, are attached or detached dwelling units that provide complete independent living facilities for one or more persons, including permanent provisions for living, sleeping, cooking, and sanitation. ADUs can serve as an alternative source of affordable housing for lower income households and seniors. These units typically rent for less than apartments of comparable size. California law requires local jurisdictions to adopt ordinances that establish the conditions under which ADUs are permitted (*California Government Code*, §65852.2), and requires local governments to use a ministerial, rather than discretionary process for approving ADUs. A ministerial process is intended to reduce permit processing periods and development costs, because ADU applications that comply with local zoning regulations and standards can be approved without a public hearing.

In May 2018, the City adopted Zoning Code Section 9.240.290 to regulate ADUs consistent with State requirements. This section states that, “accessory dwelling *units* shall be approved in the R-1 and R-4 Zones, and in areas designated for one (1) family dwelling use as part of a subdivision, planned *unit* development (PUD) or specific plan (SP) that allows for up to five (5) *units* per acre, subject to the approval of the Planning Director” upon finding that conditions outlined in the Zoning Code have been met. These standards include the allowable size of accessory dwelling units. As defined by the Zoning Code, the total area of floor space for a detached accessory dwelling *unit* shall not exceed seven hundred fifty (750) square feet. The total area of floor space of an attached accessory dwelling *unit* shall not exceed fifty (50) percent of the existing or proposed primary dwelling living area, with a maximum increase in floor area of seven hundred fifty (750) square feet.

Reasonable Accommodation for Persons with Disabilities

Under the federal Fair Housing Act, the City is required to make reasonable accommodations in rules, policies, practices, and services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling. Such accommodations may include the relaxation of parking standards and structural modifications such as wheelchair ramps.

Building and development standards may constrain the ability of persons with disabilities to live in housing units that are suited to their needs. Currently, the City considers requests for reasonable accommodation when requests are made, without a formal application and approval process. The City will be developing formal, written procedures for reasonable accommodations as part of the Zoning Code update.

The City has adopted the 2013 California Building Standards Code which has accessibility requirements in Chapters 11A (Housing Accessibility) and 11B (Accessibility to Public Buildings, Public Accommodations, Commercial Buildings and Publicly Funded Housing). Consistent with the federal Fair Housing Act, the State Building Code requires all multi-family structures with four or more units built after March 13, 1991 to provide accessible routes throughout the property, and “adaptable” dwelling units to allow conversion to a fully accessible unit without significant costs and the need to do significant structural modifications. In multi-family



structures with an elevator, 100% of the units must meet the accessibility requirements, whereas in buildings without an elevator, all of the ground floor units must be accessible.

The City's Housing Element establishes the following programs to promote housing accessibility:

- HE 1.1.21 **Accessible Housing for Disabled Persons.** Encourage single- and multi-family housing developers to designate accessible and/or adaptable units already required by law to be affordable to persons with disabilities or persons with special needs.
- HE 1.1.22 **Universal Design.** Encourage “universal design” features in new dwellings, such as level entries, wider paths of travel, larger bathrooms, and lower kitchen countertops to accommodate persons with disabilities.
- HE 1.1.23 **Affordable Housing for Disabled Persons.** Encourage, and as budget allows, help support programs providing increased opportunities for disabled persons in affordable residential units rehabilitated or constructed through City or County programs.

Public Policies Concerning Community Development and Housing Activities

Pursuant to California state law, the housing element of every community's general plan is required to be reviewed by the state Housing and Community Development Department (HCD) to assure compliance with housing laws. An important criterion of HCD approval of any housing element includes a determination that the local jurisdiction's policies do not unduly constrain the maintenance, improvement and development of a variety of housing choices for all income levels. HCD has reviewed Jurupa Valley's 2017 Housing Element and determined the City's residential land use regulations and procedures do not serve as a constraint, and have certified the City's Housing Element as in compliance with State law.

As presented in **Table 4-5**, the Jurupa Valley Housing Element establishes a comprehensive set of goals and policies to address the community's housing needs.

Moratoriums/Growth Management

The City of Jurupa Valley does not have any building moratoriums or growth management plans that limit housing construction.



**Table 4-5
City of Jurupa Valley Housing Element Goals and Policies**

Goals	Policy
<p>Goal HE 1:</p> <p>Encourage and, where possible, assist in the development of quality housing to meet the City’s share of the region’s housing needs for all income levels and for special needs populations.</p>	<ul style="list-style-type: none"> ▪ HE 1.1 Regional Housing Needs Allocation. Changes to the General Plan and the Zoning Ordinance and Map shall provide and/or maintain sufficient land at appropriate densities to meet the City’s Regional Housing Needs Allocation for the 2014-2021 Planning Period. ▪ HE 1.2 Affordable Housing. To encourage affordable residential development on sites zoned to allow multi-family residential uses and identified in the vacant land inventory, the City will adopt development incentives and standards to encourage lot consolidation, and to allow residential development at a density of up to 25 dwelling units per acre in the Highest Density Residential (HHDR) designation, where appropriate. ▪ HE 1.3 Preservation of Affordable Housing. All residential development projects that receive City financial incentives shall be required to remain affordable, in compliance with the specific requirements of the program in which they participate. ▪ HE 1.4 Availability of Suitable Sites. Ensure the availability of suitable sites for the development of affordable housing to meet the needs of all household income levels, including special needs populations. ▪ HE 1.5 Housing for Mentally Disabled. Encourage the development of additional housing for the mentally disabled. ▪ HE 1.6 Housing for Homeless Persons. In cooperation with other cities and/or the County of Riverside, assist in the development of emergency, transitional, and permanent supportive housing for homeless persons and families. ▪ HE 1.7 Self-Help Housing. City will promote self-help housing programs (e.g., Habitat for Humanity) and, as budget allows, provide financial assistance ▪ HE 1.8 Innovative Housing. Encourage innovative housing, site plan design, and construction techniques to promote new affordable housing, improve energy efficiency, and reduce housing costs. ▪ HE 1.9 Starter Housing. Consider allowing construction of high quality “starter housing” (single-family units up to 1,600 square feet) on smaller lots in Medium-High Density and High Density zones, and consider providing incentives such as flexible development standards, permit fast tracking, and City fee reductions.
<p>Goal HE 2:</p> <p>Conserve and improve the housing stock, particularly housing affordable to lower income and special housing needs households.</p>	<ul style="list-style-type: none"> ▪ HE 2.1 Retain Housing. Where feasible and appropriate, older, sound housing should be retained, rehabilitated, and maintained as a significant part of the City’s affordable housing stock, rather than demolishing it. Demolition of non-historic housing may be permitted where conservation of existing housing would preclude the achievement of other housing objectives or adopted City goals. ▪ HE 2.2 Removal of Affordable Housing. Discourage the removal or replacement of sound housing that is affordable to extremely low, very-low, low- and moderate income households, and avoid discretionary approvals or other municipal actions that remove or adversely impact such housing unless: 1) it can be demonstrated that rehabilitation of lower-cost units at risk of replacement is financially or physically infeasible, or 2) an equivalent number of new units comparable or better in affordability and amenities to those being replaced is provided, or 3) the project will remove substandard, blighted, or unsafe housing. ▪ HE 2.3 Public Housing. Encourage the Riverside County Housing Authority to pursue federal and state funds to modernize public housing affordable to very



Goals	Policy
	<p>low and low-income households.</p> <ul style="list-style-type: none"> ▪ HE 2.4 Tax-Exempt Bonds. Consider using tax-exempt private activity bonds for the financing of multi-family housing rehabilitation. ▪ HE 2.5 Historic Residential Properties. Consider adopting incentives for the preservation of historic residential structures, such as the Mills Act Program, which provides property tax relief for rehabilitation of historic properties, as well as grants for the identification of historic structures. ▪ HE 2.6 Housing Rehabilitation Funding. Pursue all available federal, state, and local funds to assist housing rehabilitation. ▪ HE 2.7 Neighborhood Quality. The condition and quality of residential neighborhoods is a key measure of a community’s housing health. The City will consider and promote the safety, appearance, and quality of residential neighborhoods by preserving the fabric, amenities, spacing (i.e., building heights and setbacks), and overall character and quality of life in established neighborhoods. ▪ HE 2.8 At-Risk Housing Preservation. Work with Riverside County Housing Authority and other housing agencies to preserve the affordability of assisted housing and other affordable housing resources at risk of conversion to market rate housing utilizing federal, state, and local financing and subsidies, as City resources allow.
<p>Goal HE 3: Promote equal housing opportunities for all persons.</p>	<ul style="list-style-type: none"> ▪ HE 3.1 Fair Housing Program. Continue to support fair housing laws and organizations that provide fair housing information and enforcement. ▪ HE 3.2 Housing Information. Provide referrals to low-income households and households with special housing needs on how to obtain housing counseling, financing, and other housing information. ▪ HE 3.3 Housing Opportunities for Seniors, Disabled Persons and Veterans. Encourage and, as budget allows, help support programs and activities that promote affordable housing opportunities.
<p>Goal HE 4: Maintain and enhance residential neighborhoods and remove blight.</p>	<ul style="list-style-type: none"> ▪ HE 4.1 Removal of Blight. As part of development approvals, City budget and Capital Improvement Plan (CIP) program and other municipal actions, give high priority to removing and reversing the effects of blight, particularly in residential neighborhoods and highly visible locations along major street and highway corridors. Within established neighborhoods, new residential development shall be of a character, scale, and quality that preserve the neighborhood character and maintain the quality of life for existing and future residents. ▪ HE 4.2 Design Compatibility. Higher density housing should maintain high quality standards for unit design, privacy, security, on-site amenities, and public and private open space. Such standards should be flexible enough to allow innovative and affordable design solutions and shall be designed to enhance prevailing neighborhood architectural and site character. ▪ HE 4.3 Neighborhood Integration. New neighborhoods should be an integral part of an existing neighborhood or should establish pedestrian, bicycle, and, where appropriate, equestrian linkages that provide direct, convenient, and safe access to adjacent neighborhoods, schools, parks and shopping.
<p>Goal HE 5: Reduce residential energy and water use.</p>	<ul style="list-style-type: none"> ▪ HE 5.1 New Construction. Encourage the development of dwellings with energy-efficient designs, utilizing passive and active solar features and energy-saving features that exceed minimum requirements in state law. ▪ HE 5.2 Sustainable Design. Residential developments should promote sustainability in their design, placement, and use. Sustainability can be promoted through a variety of housing strategies, including the following:



Goals	Policy
	<ol style="list-style-type: none"> 1. Maximize use of renewable, recycled-content and recycled materials, and minimize use of building materials that require high levels of energy to produce or that cause significant, adverse environmental impacts. 2. Incorporate renewable energy features into new homes, including passive solar design, solar hot water, solar power, and natural ventilation and cooling. 3. Minimize thermal island effects through reduction of heat-absorbing pavement and increased tree shading. 4. Avoid building materials that may contribute to health problems through the release of gases or glass fibers into indoor air. 5. Design dwellings for quiet, indoors and out, including appropriate noise mitigation for residential uses near noise sources such as highways, major streets, railroad tracks and industrial uses. 6. Design dwellings to be economical to live in due to reduced energy or resource use, ease of maintenance, floor area, or durability of materials. 7. Help inform residents, staff, and builders of the advantages and methods of sustainable design, and thereby develop consumer demand for sustainable housing. 8. Consider adopting a sustainable development rating system, such as the LEED® or Green Globes program. <ul style="list-style-type: none"> ▪ HE 5.3 Site and Neighborhood Design. Residential site, subdivision, and neighborhood designs should consider sustainability. Some ways to do this include: <ol style="list-style-type: none"> 1. Design subdivisions to maximize solar access for each dwelling and site. 2. Design sites so residents have usable outdoor space with access to sun and shade. 3. Streets and access ways should minimize pavement devoted to vehicular use. 4. Use multi-purpose neighborhood “pocket parks”/ retention basins to purify street runoff prior to its entering creeks. Retention basins shall be designed to be visually attractive as well as functional. Fenced off retention basins should be avoided. 5. Encourage cluster developments with dwellings grouped around significantly sized, shared open space in return for City approval of smaller individual lots. 6. Treat public streets as landscaped parkways, using continuous plantings at least 6 feet wide and, where feasible, median planters to enhance, define, and buffer residential neighborhoods of all densities from the effects of vehicle traffic.
<p><i>Source: City of Jurupa General Plan 2017</i></p>	



Residential Development Review Process and Fees

Development Review Process

The City of Jurupa Valley's development review process is designed to accommodate housing development applications of various levels of complexity and requiring different entitlements. Developments of single-family homes and manufactured homes on existing, individual lots in any residential zones that meet development standards (setbacks, lot size and coverage, building height, parking) do not require discretionary approval. They require only a building permit - a ministerial process - to allow construction. Multi-family housing currently requires a Site Development Permit (SDP), described below.

Processing times vary with the complexity of the project. Building permit applications for new single-family houses typically take 3 to 6 months to complete the building permit plan check process, sometimes longer depending upon the size of the project. Processing multi-family development applications, which often require general plan amendments, rezoning, and CEQA review, typically requires 6 months to 1 year—depending upon the number of units—to complete discretionary planning review. The City's permit procedures expedite planning and building approvals where possible and are not likely to unduly constrain housing development. The following discussion describes in detail the City's administrative development review procedures (such as Site Development Plan Review) as well as discretionary review and approval processes.

Pre-Application Review. Prospective applicants are encouraged to meet with a City Planner prior to submitting an application to help expedite the development process. Applicants may also request a more detailed, formal pre-application review. This type of review can be helpful for large or more complex projects, and when the applicant desires review by multiple City departments, such as Engineering, Building, and Public Works. Pre-Application Review requires submittal of an application, fee, plans, and background information and can take from 3 to 5 five weeks to process. Following submittal, the application is routed to all City departments and outside agencies that would review the formal entitlement application. For example, a Tentative Tract Map would be transmitted to utility companies (e.g., Southern California Edison, SoCal Gas), special districts (JCSD/RCSD/ JARPD) and the County of Riverside.

Site Development Permit (SDP). The City of Jurupa Valley currently requires a Site Development Permit for all multi-family residential projects. Site Development Permits (SDPs), at a minimum, require submittal of an application, fee, checklist, site plan and other exhibits, and supporting information to the Planning Department. Minor Site Development Permits, such as for accessory structures, are exempt from environmental review and can be acted upon by the Planning Director without a public hearing. SDPs requiring environmental review under CEQA require a public hearing held by the Planning Director. All SDPs require written notice to owners of property located within at least 300 feet of the proposed project boundaries. The time for processing an SDP varies with the complexity of the proposal. However, the review process for a



minor SDP that is exempt from CEQA can usually be accomplished within 90 to 120 days. Overall, the SDP process provides a streamlined, discretionary review process that allows most residential development projects to be evaluated for compliance with General Plan and Zoning Ordinance standards.

Conditional Use Permits (CUP). A CUP is required for certain limited residential uses that are conditionally permitted in non-residential districts (e.g., General Commercial “C-1/C-P” zone district), such as congregate care residential facilities. Typically, the Planning Commission reviews and takes final action on CUPs, and appeals are considered by the City Council, who would then take final action on the matter. Conditions of approval may include, but are not limited to, hours of operation, duration, site improvements (e.g., access, parking, landscaping, fencing, signage), off-site improvements (e.g., trails, frontage improvements, street trees), and architectural design. The City’s CUP process typically allows the Planning Commission to consider conditional uses within approximately 90 to 150 days.

Summary. Jurupa Valley’s processing and permit procedures are consistent with state planning and zoning law and are not considered to be an unreasonable constraint on the cost or supply of housing. However, the City will amend the Zoning Code to eliminate the requirement for discretionary review for multi-family development in multi-family residential zones to better facilitate permit processing for projects that conform to the General Plan and Zoning Ordinance development standards. Housing Element Program *HE 3.1.9* calls for Zoning Ordinance amendments to allow multi-family housing development without discretionary approval, such as a conditional use permit or planned unit development review. This would not preclude design review of multi-family housing projects; however, such review must be ministerial and such review must not trigger environmental review under the Public Resources Code (CEQA). For example, staff, the Planning Commission or City Council could review a project’s design merits and call for a project proponent to make design-related modifications, but could not deny a project based on the “residential use” itself if it otherwise met General Plan and Zoning requirements.

Planning and Development Fees

The City of Jurupa Valley relies upon various planning and development fees to recoup costs and ensure that essential services and infrastructure are available when needed. These fees are passed on to the homebuyer or renter, therefore increasing the local cost of housing. Planning fees for Jurupa Valley are summarized in **Table 4-6**.



Table 4-6
City of Jurupa Valley Planning Fees

Application	Initial Deposit Fee
General Plan Amendment	\$7,479.66
Conditional Use Permit	\$9,646.14 + \$5.10 per lot or site
Variance (filed alone)	\$2,625.48
Site Development Permit (Plot Plan)	\$4,791.96
Tentative Tract Map (Single-Family Residential in R-2, R-4 or R-6 zones)	\$11,368.92 + \$102.00 per lot + \$19.38 per acre
Tentative Tract Map (Multi-Family Condominium)	\$9,147.36 + \$78.54 per unit + \$19.38 per acre
Tentative Parcel Map (without waiver of Final Parcel Map)	\$5,621.22 + \$104.04 per lot
Zone Change	\$3,648.54
<i>Sources: City of Jurupa Valley General Plan 2017, City Fee Schedule September 2019</i>	

In addition to planning fees, the City of Jurupa Valley collects development impact fees from developers of new housing units, as well as commercial, office, retail, and industrial development. These fees are used to offset costs primarily associated with traffic impacts and City street improvements. **Table 4-7** summarizes the development impact fees required by the City and by other relevant agencies in 2019 for residential developments. Like all cities, Jurupa Valley abides by state law with respect to fees and exactions. Although impact fees and requirements for offsite improvements add to the cost of housing, these fees and requirements are necessary to maintain the quality of life within a community.



**Table 4-7
Residential Development Impact Fees (Per Unit)**

Fee Type	Area 1: Jurupa			
	Single-Family		Multi-Family	
Public Facilities Fee	\$1,207		\$1,011	
Fire Facilities Fee	\$705		\$590	
Transportation (Roads, Bridges) Fee	\$1,001		\$791	
Transportation (Signals) Fee	\$420		\$378	
Regional Parks	\$563		\$472	
Regional Trails Fee	\$316		\$264	
Libraries Fee	\$341		\$286	
Program Administration Fee	\$60		\$50	
Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Fee	Less than 8.0 units per acre: \$2,168/unit Between 8.0-14.0 units per acre: \$1,388/unit Greater than 14.0 units per acre: \$1,127/unit			
Mira Loma Road and Bridge Benefit District (RBBB) Fee	Zone A: \$1,667 MF: \$417	Zone B: \$884 MF: \$612	Zone D: \$2,681 MF: \$1,857	Zone E: \$1,644 MF: \$1,139
<i>Notes: Fees for senior single-family units are reduced by 33%. Source: City of Jurupa Valley, 2019</i>				

Community Representation and Participation

An important strategy for expanding housing choices for all residents is to ensure that residents’ concerns are heard. A jurisdiction must create avenues through which residents can voice concerns and participate in the decision-making process. The City values citizen input and has established a City Council and a Planning Commission with representation from the community. In addition, the community participated in the preparation of this Fair Housing Assessment (AI) through various workshops and an online fair housing survey. The public outreach program for the AI is outlined in the City of Jurupa Valley Citizen Participation Plan and discussed in the Introduction (Chapter 1) of this AI.

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. Jurupa Valley is a General Law City that is governed by a five-member City Council. Members of the City Council are elected by-



district for a four-year term. Each year, the City Council selects one of its members to serve as Mayor and one member to serve as Mayor Pro Tem. The Mayor presides over all Council meetings and is the ceremonial head of the City for official functions.

Planning Commission

The Jurupa Valley City Planning Commission guides the City's planning processes. The Planning Commission is composed of five citizens, appointed by the City Council, who help plan for the City's growth, economic vitality and environmental quality. The Commission reviews and makes final decisions on many types of planning applications, such as land use permits, subdivisions and environmental review. The Commission also makes recommendations to the City Council on planning applications that require Council approval. In addition, the Commission advises the Council on long-range planning matters, such as zoning and the General Plan.

Community Development Advisory Committee

The Community Development Advisory Committee is responsible for reviewing applications for Community Development Block Grant (CDBG) funding, receiving testimony from CDBG applicants, and providing the City Council with recommendations regarding the allocation of CDBG funding. The Council-appointed Committee consists of five members serving for a term of four years, and meets on an as-needed basis.

In order to avoid potential conflicts of interest, Committee members cannot serve in any capacity on any board, committee, or commission of any public agency or district, and cannot have any decision-making authority in a community organization that applies for or receives funds through the CDBG program.

Traffic Safety Committee

The Traffic Safety Committee consists of five members, of which two are citizens appointed by the City Council. The committee's duties include: (1) assure consideration of common input, community values, and goals; (2) enable problem solving in a group setting; (3) provide a 'sounding board' for traffic related requests; (4) receive appropriate complaints having to do with traffic matters; (5) recommend to the City Council ways and means for improving traffic conditions; and (6) stimulate and assist in the preparation and publication of selected traffic reports.



5. Fair Housing Practices

This section provides an overview of the institutional structure of the housing industry with regard to fair housing practices. In addition, this section discusses the fair housing services available to residents, as well as the nature and extent of fair housing complaints received by the City. 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.

Fair Housing Practices in the Homeownership Market

On December 5, 1996, HUD and the National Association of Realtors (NAR) entered into a Fair Housing Partnership. Article VII of the HUD/NAR Fair Housing Partnership Resolution provides that HUD and the NAR develop a Model of Affirmative Fair Housing Marketing Plan for use by members of the NAR to satisfy HUD's Affirmative Fair Housing Marketing regulations. Even so, discrimination still occurs in the housing market.

Homeownership Process

One of the main challenges in owning a home versus renting a home is the process. Buying a house takes considerably more time and effort than finding a home to rent. The major legal and financial implications surrounding the process also intimidate potential buyers. People can be overwhelmed by the unique terminology, the number of steps required and the financial considerations involved. The process is costly and fair housing issues could surface at any time during this process.

Advertising

The first thing a potential buyer is likely to do when evaluating a home purchase, is search advertisements either in magazines, newspapers or the Internet to get a feel for what the market offers. Language in advertising is sometimes an issue within the realm of real estate. Advertisements cannot include discriminatory references such as the use of words describing current or potential residents or the neighbors or the neighborhood in racial or ethnic terms. Some commonly used statements that are discriminatory include the following:

- Adults preferred
- Perfect for empty nesters
- Conveniently located by a particular church



- Ideal for married couples without kids

Even the use of models in ads has been questioned, based on the idea that it appears to appeal to a certain race. In addition, selecting media or locations for advertising that deny information on listings to certain segments of the housing market could also be considered discriminatory. 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 a protected class is preferred. In cities such as Jurupa Valley, where there is a substantial Hispanic population (67 percent, City of Jurupa Valley 2017 General Plan), the homeownership process offers opportunities for fair housing violations to arise due to the natural tendency to advertise in a specific language such as Spanish. Although the advertisements might not violate fair housing laws, these advertisements could limit opportunities for other racial/ethnic groups to find housing. Although the homeownership process is outside the jurisdiction of the City, recent litigation has set precedence for violations in advertisements that hold publishers, newspapers, the Multiple Listing Service, real estate agents and brokers accountable for discriminatory ads. As a reminder to choose words carefully, the Multiple Listing Service now prompts a fair housing message when a new listing is being added.

Lending

Initially, buyers must find a lender that will qualify them for a loan. This part of the process entails an application, a credit check, an analysis of ability to repay and the amount for which one is eligible, 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), however, there is no guarantee that individual loan officers or underwriters will not misuse the information. A report on mortgage lending discrimination by the Urban Land Institute⁶ outlines four basic stages in which discrimination can occur:

- Advertising and outreach
- Pre-application inquiries
- Loan approval/denial and terms/conditions
- Loan administration

A number of different individuals take part in the various stages of this process and any of them could potentially discriminate. Further areas of potential discrimination include differences in the level of encouragement, financial assistance, types of loans recommended, amount of down payment required and level of customer service provided.

⁶Turner, M.A., & Skidmore, F. (Eds.). (1999, June). *Mortgage Lending Discrimination: A Review of Existing Evidence*. Washington, DC: Urban Institute.



Real Estate Agents

Finding a realtor is normally the next step, which can be done by looking in newspapers, searching the Internet or primarily through referrals. The agent will find the home that fits a buyer's needs, desires and budget based on the amount for which the buyer is qualified by the lending institution. Realtors might act as agents of discrimination by unintentionally or even intentionally steering potential buyers to or from a particular neighborhood. In Jurupa Valley, with a large Hispanic population, a real estate agent might assume that a non-Hispanic buyer would not be interested in living in a primarily Hispanic community or might assume that Hispanic buyers would prefer living in a Hispanic community. This situation could also apply to other protected classes who can be steered away from certain areas on the presumption that they might not want to live there based on the existing demographic makeup of the neighborhood.

Agents might also discriminate by who they agree to represent, who they turn away and the comments they make about their clients. However, the California Association of Realtors (CAR) has included language on many of its forms disclosing fair housing laws to those involved.

The Inland Valley Association of Realtors (IVAR) highlight the Fair Housing Act by continuously addressing discrimination in their professional activities. They support programs that educate the public about the right to equal housing opportunities. IVAR helps prohibit discrimination in housing by swearing to uphold the National Association of Realtors (NAR) Code of Ethics. The Code commits all Realtors to providing equal professional services without discrimination.

Per their bylaws - all members of IVAR have a significant focus on the buying and selling of property without discriminatory practices – adhering to all Federal, State and other local laws. The Association outlines ways to meet code of ethics training required by NAR.

Appraisals

Banks order appraisal reports to determine whether a property is worth the amount of the loan requested. Generally speaking, appraisals are based on the comparable sales of properties surrounding the neighborhood of the property being appraised. Other factors are taken into consideration, such as the age of the structure, any improvements made and location. Some neighborhoods with higher concentrations of minorities may appraise lower than like properties in neighborhoods with lower concentrations. Unfortunately, this practice is geared toward a neighborhood and not an applicant and therefore is not a direct violation of fair housing law that can easily be addressed. One effect of this practice, however, is that it tends to keep property values lower in a given neighborhood, thereby restricting the amount of equity and capital available to those residents. Individual appraisers are the ones making the decisions on the amounts, thus there is room for flexibility in the numbers. As appraisers are individually licensed, similar to real estate agents, they risk losing their license for unfair practices.



Sellers

A seller might not want to sell his/her house to certain purchasers based on classification biases protected by fair housing laws, or they may want to accept offers only from a preferred group. Often, sellers are home when agents show the properties to potential buyers and may develop certain biases based on this contact. Sellers must sign the Residential Listing Agreement and Seller's Advisory forms, which disclose that a seller understands fair housing laws and practices of nondiscrimination. Yet enforcement is difficult because a seller may have multiple offers and choose one based on a bias.

Covenants, Conditions and Restrictions

Covenants, Conditions and Restrictions (CC&Rs) in the past were used to exclude certain groups such as minorities from equal access to housing in a community. Today, 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 else 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 to be revised.

Communities with old subdivisions or condominium developments may still contain CC&Rs that do not comply with the fair housing laws. A typical example relates to occupancy standards, which an association may seek to enforce in order to oust a particular group or discriminate based on familial status or lack thereof. However, provisions in the CC&Rs that violate the fair housing laws are not enforceable by the homeowners association.⁷

Insurance

Insurance agents are provided with underwriting guidelines for the companies they work for to determine whether a company will sell insurance to a particular applicant. Currently, underwriting guidelines are not public information, however, consumers have begun to seek access to these underwriting guidelines in order to learn if certain companies have discriminatory policies. Some states are being more responsive than others to this demand and

⁷In 1985, the Davis-Sterling Common Interest Development Act (Civil Code § 1353-1378) was passed by the State of California. The Davis-Sterling Act contains all laws pertaining to Common Interest Developments (CIDs) and requires all CIDs to be managed by an association. Developers are required to create CC&Rs and bylaws, which are the governing documents that dictate how the association operates and what rules the owners—and their tenants and guests—must obey. The CC&Rs are legally enforceable by the association and individual owners, and nothing in the CC&Rs can take precedence over federal, state or local laws.



have recently begun to require that companies file their underwriting guidelines with the state department of insurance, which would then make the information public.

Many insurance companies have applied strict guidelines, such as not insuring older homes, that disproportionately affect lower-income and minority families that can only afford to buy in older neighborhoods. A California Department of Insurance (CDI) survey found that less than one percent of homeowners insurance available in California is currently offered free from tight restrictions.⁸ CDI has also found that many urban areas are underserved by insurance agencies.

The California Organized Investment Network (COIN) is a collaboration of the California Department of Insurance, the insurance industry, community economic development organizations and community advocates. This collaboration was formed in 1996 at the request of the insurance industry as an alternative to state legislation that would have required insurance companies to invest in underserved communities, similar to the federal Community Reinvestment Act (CRA) that applies to the banking industry. COIN is a voluntary program that facilitates insurance industry investments to provide profitable returns to investors and economic and social benefits to underserved communities.

The California Fair Access to Insurance Requirements (FAIR) Plan was created by the legislature in 1968 after the brush fires and riots of the 1960s made it difficult for some people to purchase fire insurance due to hazards beyond their control. The FAIR Plan is designed to make property insurance more readily available to people who have difficulty obtaining it from private insurers because their property is considered “high risk.”

Credit and FICO Scores

Credit history is one of the most important factors in obtaining a home purchase loan. Credit scores determine loan approval, interest rates associated with the loan and the type of loan an applicant will be given. Applicants with high credit scores are generally given conventional loans, whereas those with lower and moderate range scores often use government-backed loans or subprime loans. Applicants with lower scores also receive higher interest rates on the loans as a result of being perceived as a higher risk to the lender and may even be required to pay points depending on the type of lending institution used.

Fair Isaac and Company (FICO), which is the company used by the Experian (formerly TRW) credit bureau to calculate credit scores, has set the standard for the scoring of credit history. TransUnion and Equifax are two other credit bureaus that also provide credit scores, though they are typically used to a lesser degree.

In short, points are awarded or deducted based on certain items such as how long one has had credit cards, whether one makes payments on time and if credit balances are near the maximum. Typically, the scores range from the 300s to around 850, with higher scores

⁸Homeowners Premium Survey. (2010, February 8). California Department of Insurance. Section 12959 of the California Insurance Code requires the commissioner to publish and distribute a comparison of insurance rates report for those lines of insurance that are of most interest to individual purchasers of personal lines of coverage.



demonstrating lower risk. Lower credit scores require a more thorough review than higher scores, and mortgage lenders will often not even consider a score below 600.

FICO scores became more heavily relied on by lenders when studies showed that borrowers with scores above 680 almost always make payments on time, whereas borrowers with scores below 600 seemed fairly certain to develop problems. Credit scores also made it easier to develop computer programs (electronic underwriting) that can make a “yes” decision for loans that should obviously be approved. Some of the factors that affect a FICO score are as follows:

- Delinquencies
- New accounts (opened within the last 12 months)
- Length of credit history (a longer history of established credit is better than a short history)
- Balances on revolving credit accounts
- Public records, such as tax liens, judgments or bankruptcies
- Credit card balances
- Number of inquiries
- Number and types of revolving accounts

National Association of Realtors

Since 1996, the National Association of Realtors (NAR) has maintained a Fair Housing Partnership with the U.S. Department of Housing and Urban Development (HUD). As part of this partnership, HUD and NAR have developed a Model Affirmative Fair Housing Action Plan for use by members of NAR to satisfy HUD’s Affirmative Fair Housing Marketing regulations. Through this Plan, NAR offers a full spectrum of fair housing resources and training to member realtors. The term *Realtor* identifies a licensed professional in real estate who is a member of the NAR, however, not all licensed real estate brokers and salespersons are members of the NAR.

Code of Ethics. Article 10 of the NAR Code of Ethics provides that “Realtors shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, or national origin. Realtors shall not be a party to any plan or agreement to discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, or national origin.” A Realtor pledges to conduct business in keeping with the spirit and letter of the Code of Ethics. Article 10 imposes obligations on realtors and is a firm statement of support for equal opportunity in housing. A realtor who suspects discrimination is instructed to call the local Board of Realtors. Local Boards of Realtors will accept complaints alleging violations of the Code of Ethics filed by a home seeker who alleges discriminatory treatment in the availability, purchase or rental of housing. Local Boards of Realtors have a responsibility to enforce the Code of Ethics through professional standards, procedures and corrective action in cases where a violation of the Code of Ethics is proven to have occurred.



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

Realtor Fair Housing Declaration. In accordance with the Code of Ethics, each Realtor signs the following pledge, developed in 1996 as a result of the HUD-NAR agreement.

The Realtor agrees to:

- Provide equal professional service without regard to race, color, religion, sex, handicap, familial status, or national origin of any prospective client, customer, or of the residents of any community.
- Keep informed about fair housing law and practices, improving clients’ and customers’ opportunities and his/her business.
- Develop advertising that indicates that everyone is welcome and no one is excluded, expanding his/her client’s and customer’s opportunities to see, buy or lease property.
- Inform clients and customers about their rights and responsibilities under the Fair Housing Laws by providing brochures and other information.
- Document efforts to provide professional service, which will assist him/her in becoming a more responsive and successful Realtor.
- Refuse to tolerate non-compliance.
- Learn about those who are different and celebrate those differences.
- Take a positive approach to fair housing practices and aspire to follow the spirit, as well as the letter, of the law.
- Develop and implement fair housing practices for his/her firm to carry out the spirit of this declaration.

Certification Program. In addition to the Code of Ethics, NAR certifies real estate professionals who receive specialized training to work with a diverse population. The “At Home with Diversity: One America” certification program provides planning tools for reaching out and marketing to a diverse housing market in the areas of diversity awareness, building cross-cultural skills, and developing a diversity business plan. Realtors completing the course can display the HUD One America logo and NAR at Home With Diversity logo in their advertising, signaling to prospective buyers that the realtor is knowledgeable about working with diverse populations. Other NAR training tools include brochures for existing and prospective homebuyers on “How to Avoid Predatory Lending” and “Learn How to Avoid Foreclosure and Keep Your Home.”



California Association of Realtors (CAR)

The California Association of Realtors (CAR) is an arm of NAR, and represents nearly 170,000 realtors statewide. Members are required to adhere to the NAR Code of Ethics and sign the Fair Housing Pledge. Jurupa Valley realtors are served by CAR's Los Angeles office, and have access to numerous services and programs including legislative advocacy, legal programs, and educational training. CAR offers a variety of professional development courses, including training realtors in working with foreclosed properties.

CAR has developed diversity-related initiatives that now serve as models for associations across the country. These include:

- WomanUP! - Even though the real estate industry is predominantly female, women are underrepresented in leadership positions at both the brokerage and senior management levels. The goal of C.A.R.'s Women's Initiative is to create a community where mentors and leaders can communicate, collaborate, advocate for, and support one another.
- Latino Initiative Voices in Action – A program provides information and resources to members; it includes materials on home buying and fraud prevention. Resources include survey research on Latino renters and their views on homeownership and a research paper on homeownership and inequality.
- Support of NAR programs – The CAR website includes information on NAR's At Home With Diversity course as well as available funding for diversity programs.

Inland Valley Association of Realtors

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 among these associations, and local association membership is generally determined by the location of the broker for which an agent works.

The Inland Valley Association of Realtors (IVAR) is the local association that serves Jurupa Valley. IVAR has offices in the cities of Riverside and Rancho Cucamonga. IVAR provides a variety of services, including helping to promote fair housing activities. The Association has a standing Grievance Committee whose function is to do a "paper review" of disciplinary complaints, to screen out frivolous complaints, to prevent abuse and harassment, and to assure complaints are properly framed. It does not review arbitration requests. Grievance Committee "paper review" is the first step in the Disciplinary Hearing process. Associations of REALTORS® only determine whether the Code of Ethics or association membership duties have been violated, not whether the law or real estate regulations have been broken. When broken laws or regulations are suspected or when the real estate professional is not a REALTOR®, referrals are made to the California Department of Real Estate (DRE).



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. State real estate licenses are issued for a four-year period.

DRE has adopted education requirements that include courses in ethics and 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 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.

On or after January 1, 1996, a real estate salesperson renewing his/her license for the first time must complete separate three-hour courses in Agency, Ethics, Trust Fund Handling and Fair Housing to qualify for renewal. All licensees, with the exception of those renewing for the first time, are required to complete a full 45 hours of continuing education for each license renewal.

For the initial renewal on or after January 1, 1996, the law requires, as part of the 45 hours of continuing education, completion of four mandatory three-hour courses in Agency, Ethics, Trust Fund Handling and Fair Housing. 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 customer service or consumer protection, at the option of the licensee.

The DRE requires all licensees to provide proof of continuing education courses with the following two exceptions:

1. An applicant provides proof that he/she is 70 years of age or older.
2. An applicant provides proof that he/she has been licensed for 30 consecutive years.

DRE is responsible for investigation of written complaints received from the public and other real estate agents/brokerages regarding alleged violations of real estate law among licensed real estate brokers and salespersons. Complaints may involve fair housing issues. If DRE determines a violation has occurred, they have the authority to revoke the real estate license. Violations may result in civil injunctions, criminal prosecutions or fines.

Fair Housing Practices in the Rental Housing Market

Similar to the homeownership market, a major challenge to ensuring fair housing in the rental market is the complexity of the process. There are several stages in the process of renting a home or apartment: 1) the advertising and outreach stage, 2) pre-application inquiries and responses, 3) the criteria for acceptance, 4) the lease and 5) administration of the lease. This



section discusses these phases of the rental process. Although a potential homebuyer might face discriminatory practices primarily during the process of purchasing a home, a renter could confront housing discrimination not only during the process of renting but also throughout the tenancy.

The Apartment Rental Process

Although the process of renting an apartment may be less expensive and burdensome up-front than the home-buying process, it may still be just as time-consuming. Potential renters might still face discrimination during the various stages of the rental process.

Advertising. Like finding a home to purchase, the main sources of information are the classified advertisements in local newspapers, word of mouth, signs, apartment guides, the Internet and apartment brokers. The same types of discriminatory language previously described under the Homeownership Process may be used by landlords or apartment managers to exclude “undesirable elements.”

A particularly difficult situation to address is the development of small apartment complexes by property owners who may be new to the rental housing industry. Compliance with fair housing laws is difficult to monitor among the small property owners. Outreach to this group is also difficult because many of these owners may not belong to the Apartment Owners or Apartment Managers associations, or do not actively participate in events/trainings offered by these associations. Advertising by small property owners may not always comply with the fair housing laws. For example, rental ads in local Spanish-language newspapers do not always appear in the English-language newspapers, as required by law.

Viewing the Unit. Viewing the unit is the most obvious place where potential renters could encounter discrimination because landlords or managers might discriminate based on race or disability, or judge on appearance whether a potential renter is reliable or might violate any of the rules. For example, there have been cases where a manager tried to deter a family by indicating strict occupancy standards or frowning on the presence of young children accompanying a viewer. Furthermore, discrimination against families with children and people with disabilities is even more prevalent than racial discrimination.

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. Recent legislation provides for applicants to receive a copy of the report used to evaluate applications. In addition, applicants may also request a copy of their credit report (for a fee) to verify that the information used to approve/deny their application is accurate.

Lease. Most apartments are rented under either a lease agreement or a month-to-month rental agreement. A lease is favorable from a tenant’s point of view for two reasons: the tenant is assured the right to live there for a specific period of time and the tenant has an established rent



during that period. Most other provisions of a lease protect the landlord. Information written in a lease or rental agreement includes the rental rate, required deposit, length of occupancy, apartment rules and termination requirements.

In a tight housing market, when a landlord can “financially afford” to choose tenants, the tendency is to offer shorter lease terms. In this case, a landlord might simply ask the “not-so-desirable” tenant to leave with a 60-day Notice to Vacate. Short-term leases also allow the landlord to raise rent more frequently.

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 might not be standard for all tenants. A landlord might act in a discriminatory way and choose strict enforcement of the rules for certain tenants based on arbitrary factors, such as race, presence of children or disability. Because of the recent escalation of housing prices throughout California, complaints regarding tenant harassment through strict enforcement of lease agreements as a means of evicting tenants have increased.

Security Deposit. A security deposit is typically required to rent a housing unit. To deter “less-than-desirable” tenants, a landlord might ask for a security deposit higher than usual. Tenants could also face differential treatment when vacating the units. The landlord might choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear. A landlord might require that persons with disabilities with service animals pay an additional pet rent, a monthly surcharge for pets or a deposit, which is also a discriminatory act.⁹

During the Tenancy. During tenancy, the most common forms of discrimination a tenant could face are based on familial status, race, national origin, sex or disability. Usually these types of discrimination appear in differential enforcement of rules, overly strict rules for children, excessive occupancy standards, and 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.

Apartment Association. The California Apartment Association (CAA) is the country’s largest statewide trade association for rental property owners and managers. The CAA was incorporated in 1941 to serve rental property owners and managers throughout California. The CAA represents rental housing owners and professionals who manage more than 1.5 million rental units. Under the umbrella agency, various apartment associations cover specific geographic areas.

The CAA has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared toward improving the approach, attitude and professional skills of onsite property managers and other interested individuals. The CCRM program consists of instruction that includes training on fair housing and ethics issues. In

⁹Okeon, M.R. (2008, January 21). “Keeping the House in Order: Watchdog Organization Has Fought Discrimination for Three Decades.” *Pasadena Star-News*.



addition, the continuing education requirements specify a minimum of two hours must be in Fair Housing.

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

- *We agree that in the rental, lease, sale, purchase, or exchange of real property, owners and their employees have the responsibility to offer housing accommodations to all persons on an equal basis;*
- *We agree to set and implement fair and reasonable rental housing rules and guidelines and will provide equal and consistent services throughout our residents' tenancy;*
- *We agree that we have no right or responsibility to volunteer information regarding the racial, creed, or ethnic composition of any neighborhood, and we do not engage in any behavior or action that would result in steering; and*
- *We agree not to print, display, or circulate any statement or advertisement that indicates any preference, limitations, or discrimination in the rental or sale of housing.*

The local CAA office that serves Jurupa Valley is the Greater Inland Empire office located in Rancho Cucamonga. This office provides education and resources specific to Riverside County and the greater Inland Empire area.

Given the characteristics of Jurupa Valley's apartment stock as predominately older and in smaller complexes, a large segment of the City's rentals are not managed by professional management companies, and may not be members of CAA. These "mom and pop" property managers are more likely to be reached through the services offered by the FHCRC.

Publicly Assisted Rental Housing. The Housing Authority of the County of Riverside (HACR) administers the Housing Choice Voucher Program (Section 8) for Riverside County and currently operates tenant based rental assistance programs serving low income, homeless, and veteran clients in eastern and western Riverside County. In order to qualify for these programs, residents must have an annual gross income at or below 80 percent of the Area Median Income (AMI), or be seniors or persons with disabilities. According to the City's Housing Element, as of October 2015, 38 Jurupa Valley households were living in public housing units managed by the HACR, and there were 1,443 Jurupa Valley households on the waiting list for public housing. The County of Riverside Economic Development Agency (EDA) estimates that 344 Jurupa Valley households currently receive rental assistance, with an additional 1,700 households on the waiting list for assistance (City of Jurupa Valley Consolidated Plan, May 2018). Of those receiving rental assistance, 270 are seniors, 181 are disabled and 17 are veterans; no homeless are currently receiving assistance.



Property owners, managers, and agents are given notice that they have a responsibility and a requirement under the law not to discriminate in the advertising or rental of property on the basis of race, color, religion, sex, handicap, familial status, or national origin. The Housing Authority also conducts quarterly Owner Seminars where owners and landlords are given information regarding the Section 8 program. A packet is provided that includes Fair Housing information and a referral to the FHCRC for further information and assistance.

Rent Control Legislation. In October 2019, Governor Gavin Newsom signed the Tenant Protection Act of 2019 (AB 1482) into law. Effective January 1, 2020, the law limits yearly rent increases to 5% plus inflation until the year 2030. This rental cap will not apply to apartment buildings built within the last 15 years or single-family home rentals. It also does not affect people currently living in rent-controlled units.¹⁰

Fair Housing Profile: Evaluation and Assessment

This section provides an overview of the variety of fair housing and tenant/landlord mediation services available to Jurupa Valley residents. In general, fair housing services include investigating and resolving housing discrimination complaints, discrimination auditing and testing, education and outreach, such as disseminating fair housing information through written material, workshops and seminars. Landlord/tenant counseling services involve informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislation and mediating disputes between landlords and tenants.

Fair Housing Services

All entitlement communities are required by HUD to have a reactive and pro-active fair housing program with specific actions and procedures that will have significant impact on preventing, reducing and eliminating housing discrimination and barriers to equal housing choice for all.

As of fiscal year 2018/2019, Jurupa Valley began contracting with the Fair Housing Council of Riverside County, Inc. (FHCRC) to provide fair housing services to the community. Prior to this time, Jurupa Valley was a cooperating city in the CDBG Urban County Program, and fair housing services were provided by the FHCRC through their contract with Riverside County. The FHCRC is a non-profit organization established in 1986 dedicated to protect the housing rights of all individuals. FHCRC provides services throughout the County of Riverside that include educational workshops, educational outreach and investigation of discrimination complaints.

¹⁰ Dillion, Liam. (2019, October 8). "Q & A: How Will California's New Rent Cap Affect Me?" *Los Angeles Times and California Apartment Association*. (2019, October 7). "Governor Signs AB 1482, Enacts Statewide Rent Cap." CAA Website: <https://caanet.org>.



Specifically, the City of Jurupa Valley contracts with FHCRC to provide fair housing services that include:

- Provide residents, landlords, and property managers with information and knowledge regarding fair housing laws with the goal of reducing or eliminating housing discrimination.
- Develop, expand, and provide more education and outreach to housing providers, community organizations, and the general public requesting housing discrimination, fair housing laws, and services provided by the Fair Housing Council.
- Provide homebuyer education, credit counseling, and fair housing counseling and awareness training to first-time home buyers and homeowners, particularly low-income and very low-income applicants.
- Conduct audit testing, including audits exploring the possibility of disability discrimination.
- Encourage rental property owners, managers, and realtors to provide written documentation to all applicants that includes the listings of all available housing, standard information on the terms and conditions of the application process, such as income qualifications, down payments, and other fees and expenses and providing Fair Housing literature.
- Provide education and outreach to housing providers through seminars or community workshops regarding the current law on discrimination against the disabled.
- Work in cooperation with and support the efforts of non-profit community service providers that assist disabled persons in locating suitable housing through information, referrals and community education.

Support of these services are outlined in the City of Jurupa Valley's 2017 General Plan, which calls for the City to promote equal housing opportunities for all persons (Goal HE 3). Programs to meet this goal include:

- HE 3.1.1: Utilize the services of the Fair Housing Council of Riverside County to implement a number of programs, including: 1) audits of lending institutions and rental establishments, 2) education and training of City staff, and 3) fair housing outreach and education regarding fair housing laws and resources.
- HE 3.1.2: Continue to use the services of the Fair Housing Council to provide education and outreach services to the public in both Spanish and English.

Education and Outreach

The FHCRC conducts extensive community outreach throughout Riverside County to promote fair housing choice awareness and knowledge. This includes training workshops for landlords, managers and owners. The following outlines topics covered:

- *Conduct Training Workshops for Renters:* The general types of activities conducted for renters includes a comprehensive fair housing presentation with particular focus placed



on common landlord-tenant disputes and misconceptions about the law in the State of California. Topics include, but are not limited to repairs notices, lease agreements, landlord-tenant mediation, Section 8, evictions, habitability and occupancy standards

- *Conduct Training Workshops for Housing Providers:* The general types of activities conducted for housing providers include workshops tailored to provide detailed analysis of fair housing laws and interpretation, with specific information on discrimination against families with children, people with disabilities, sexual harassment, hate crimes, and advertising.
- *Increase Public Awareness:* The general types of activities conducted to increase public awareness includes developing and distributing hundreds of pieces of multilingual literature throughout the County, aimed at a variety of audiences, describing how housing injustices arise, the laws that protect against housing discrimination, and ways to prevent housing inequality.

Fair Housing Enforcement

FHCRC investigates allegations of discrimination based on a person's status as a member of one of the State or Federal protected categories, which include: Race, Color, Religion, National Origin, Sex, Familial Status, Disability, Marital Status, Sexual Orientation, Ancestry, Age, Source of Income, and Arbitrary Characteristics. Race, Color, Religion, National Origin, Sex, Familial Status, and Disability are the categories protected by the federal Fair Housing Act. The State of California provides protection from discrimination based on all seven of the federal protected categories and has added Marital Status, Sexual Orientation, Ancestry, Age, Source of Income and Arbitrary Characteristics as additional protected classes under state law. Once a Fair Housing complaint is received, FHCRC educates the complainant of their rights and responsibilities. The complainants are advised of possible further investigation depending on the complaint.

FHCRC uses government regulated testing methodologies to enforce, support, and conduct fair housing investigations. A housing discrimination complaint can be investigated through testing, the gathering of witness statements and through research surveys. Based on the details provided by the complainant, FHCRC will either investigate the complaint or advise the complainants of their other options, which include conciliation, Housing and Urban Development (HUD), Department of Fair Employment and Housing (DFEH), or a private attorney.

During the five-year period July 1, 2013 through June 30, 2018, FHCRC addressed a total of 3,108 fair housing discrimination complaints throughout the County, with 95 percent of those from in-place tenants, 3 percent from landlords or managers and the balance from other types of complainants (source: *County of Riverside Analysis of Impediments to Fair Housing Choice 2019-2024*). Consistent with state and national trends, the leading bases of complaints included physical disability (51%), mental disability (12%), race (10%), familial status (8%), national origin (7%), and sex (3%). Taken together, complaints based on disability status accounted for 63 percent of all cases in Riverside County.



Jurupa Valley began contract with FHCRC for fair housing services in 2018/2019, its first year as a CDBG entitlement jurisdiction. **Table 5-1** displays the number and nature of fair housing cases in Jurupa Valley during 2018/2019, as well the findings and outcome of the cases.

A total of 21 discrimination cases were opened by the FHCRC in Jurupa Valley during 2018/2019. For the City, the leading basis for complaints was physical disability, accounting for 75 percent of the total cases reported. Adding these cases with the 5 percent for mental disability, complaints based on disability status accounted for 80 percent of all cases in Jurupa Valley, significantly higher than the 63 percent reported in Riverside County. Other bases of complaints for the City included race at 5% (versus 10% Countywide), familial status at 5% (versus 8% Countywide) and sex at 5% (versus 3% Countywide). Twenty-nine percent of discrimination complaints were from Blacks, compared to representing just three percent of the City's population.

Discrimination Suits

There have been no fair housing complaints in Jurupa Valley in which the Secretary of Housing and Urban Development (HUD) has issued a charge of discrimination, nor any housing discrimination suit filed by the Department of Justice (DOJ).

Landlord-Tenant Services

In addition to fair housing complaints, the Fair Housing Council of Riverside County (FHCRC) receives calls from Jurupa Valley residents requesting assistance with landlord/tenant issues. Clients, both landlords and tenants, contact FHCRC regarding a multitude of reasons. They include notices, evictions, rental/lease terms, repairs, rent increases and security deposits, among others. As shown in **Table 5-2**, during 2018/2019, the handled 355 complaints or requests for assistance from Jurupa Valley tenants and landlords.

Of these 355 complaints from tenants and landlords, over one-quarter were related to notices, 19 percent related to lease and rental terms, and 18 percent related to repairs. Other significant housing issues included eviction (8%), entering/harassment (4%), rent increase (4%), mobile homes (3%), and deposits (3%). The majority of landlord/tenant calls received were from Hispanics (49%), followed by Whites (29%), Blacks (18%), and Asians (1%). Given that Hispanics comprise over two-thirds of Jurupa Valley's population, it is important that the FHCRC continues their work in reaching out to this population about available services regarding landlord/tenant issues.



**Table 5-1
Discrimination Cases – City of Jurupa Valley**

Discrimination Cases	2018/19	
Protected Classification		
	#	%
Physical Disability	16	75%
Mental Disability	1	5%
Race	1	5%
Age	1	5%
Familial Status	1	5%
Sex	1	5%
Total	21	100%
Case Disposition		
	#	%
Educated	5	24%
Counseled	16	76%
Complainant Ethnicity/Race		
	#	%
White/Non-Hispanic	9	42%
Hispanic	6	29%
Black	6	29%
Complainant Income		
	#	%
Very Low	3	14%
Low	11	53%
Moderate	7	33%
Above Moderate	0	0%
Complainant Type*		
	#	
Senior	10	
Disabled	11	
Female Head of Household	9	
<p>*Complainant types are not mutually exclusive. For example, a given complainant could fall in all 3 categories. Source: Fair Housing Council of Riverside County, FY 2018/19 Quarterly Reports.</p>		



**Table 5-2
Landlord/Tenant Statistics – City of Jurupa Valley**

Landlord/Tenant Calls	2018/19	
Issue	#	%
Notices	102	28.7%
Lease/Rental Terms	69	19.4%
Repairs	65	18.3%
Eviction	29	8.2%
Entering/Harassment	16	4.5%
Rent Increase	15	4.2%
Mobile Homes	13	3.7%
Deposits	12	3.4%
Other	10	2.8%
Mold	8	2.3%
Affordable Housing	5	1.4%
Section 8 Issues	4	1.1%
Occupancy Standards	2	0.6%
Late Fees	2	0.6%
Rental Assistance	1	0.3%
Homeless Assistance Referrals	1	0.3%
Habitability	1	0.3%
Total	355	100%
Case Disposition	#	%
Mediation	3	0.8%
Counseled	352	99.2%
Complainant Ethnicity/Race	#	%
Hispanic	175	49.3%
White/Non-Hispanic	105	29.6%
Black	65	18.3%
Asian	5	1.4%
Unknown/Other	5	1.4%



**Table 5-2 (Cont.)
Landlord/Tenant Statistics – City of Jurupa Valley**

Landlord/Tenant Calls	2018/19	
Complainant Income	#	%
Very Low	54	15%
Low	198	56%
Moderate	74	21%
Above Moderate	29	8%
Complainant Type*		
Senior	116	
Disabled	54	
Female Head of Household	30	
*Complainant types are not mutually exclusive. For example, a given complainant could fall in all 3 categories. Source: Fair Housing Council of Riverside County, FY 2018/19 Quarterly Reports.		

Hate Crimes

Hate crimes are crimes that are committed because of a bias against race, religion, sexual orientation, ethnicity, disability, or gender identity. In an attempt to determine the scope and nature of hate crimes, the Federal Bureau of Investigation (FBI) Uniform Crime Reporting Program collects and publishes data on hate crimes. **Table 5-3** presents FBI hate crime statistics for 2013-2017 in Jurupa Valley as well as Riverside County. It is important to note that not all incidences of intimidation, interference or other discriminatory activities rise to the level of hate crimes and not all incidents are reported to police.

In Riverside County, there were a total of 153 hate crimes between the years 2013 and 2017, the most recent year data is available. Of these crimes 61 percent were incidents based on race, ethnicity and ancestry bias. During the same reporting time period the City of Jurupa Valley had two hate crimes reported, one attributed to race, ethnicity and ancestry bias and one attributed to religion bias. It is important to note that reporting for the City was not conducted in 2014 and 2015. However, with the numbers that have been provided it appears that there is a low level of hate crimes occurring within Jurupa Valley.



**Table 5-3
Hate Crime Incidents Reported to the FBI
in Riverside County and Jurupa Valley, 2013-2017**

Calendar Year	Race/Ethnicity/Ancestry	Religion	Sexual Orientation	Disability	Gender	Gender Identity	Total
Riverside County							
2017	14	6	6	0	0	0	26
2016	16	5	5	0	1	1	28
2015	12	8	6	0	0	0	26
2014	23	2	5	0	0	0	30
2013	29	7	6	0	0	1	43
Total	94	28	28	0	1	2	153
City of Jurupa Valley							
2017	0	0	0	0	0	0	0
2016	1	0	0	0	0	0	1
2015	No Reporting						
2014	No Reporting						
2013	0	1	0	0	0	0	1
Total	1	1	0	0	0	0	2
<p><i>Sources: FBI Hate Crime Incidents by State and Agency, Table 13, 2013-2017. https://www.fbi.gov/services/cjis/ucr/publications#Hate-Crime%20Statistics. County of Riverside AI, June 2019.</i></p>							

Services for Hate Crime Victims

Both the State and County have programs providing assistance to hate crime victims. The Office of Attorney General has established a Victims’ Services Unit that provides support, information, and assistance to victims at every stage of the criminal process. The Office of Attorney General has also established a Hate Crime Rapid Response Team. The team has employees of the Department of Justice who, if rapidly deployed, may assist local and federal law enforcement



authorities in the identification, arrest, prosecution, and conviction of the perpetrators of hate crimes. The team is on call at all times.

The City of Jurupa Valley is a contract city with the Riverside County Sheriff's Department. The personnel assigned to Jurupa Valley operate out of the Jurupa Valley Station. The County of Riverside District Attorney's Office has a Victim Services Division designated to ensure victims are informed and supported throughout the criminal justice process. Victim Service Advocates work closely with prosecutors and are specially trained and educated to help children, elders, disabled persons and violent crime victims.



6. Progress Since 2014

This chapter summarizes private and public sector impediments identified in the prior 2014-2018 AI for Riverside County, of which Jurupa Valley was a part, and the progress in implementing actions to address these impediments. The continued existence of these impediments, along with the appropriateness of identified actions to be carried forward in Jurupa Valley's 2019-2024 AI are also evaluated.

Affordable Housing

The 2014 AI identified affordable housing as an impediment to fair housing choice, indicating that “one of the biggest problems facing low-income individuals is the gap between what they can afford to pay for housing and the actual cost of that housing.” This remains true in 2019. In order to address, the AI indicated the County Economic Development Agency (EDA) needed to “reduce the cost of housing to the consumer through the elimination of unnecessary governmental actions, policies and regulations.”

2019 Status: Removed. While the high cost of housing relative to what low- and moderate-income households can afford remains a persistent problem, economic factors that impact housing choice are not fair housing issues per se. Only when the relationship between household income and housing affordability are combined with other factors – such as household type or race/ethnicity – that result in biases against a protected class do they become a fair housing issue. The City of Jurupa Valley complies with federal and state laws in its support of affordable housing, and has included several actions in both its Housing Element and this AI to help remove constraints to such development.

Lack of Available Housing

The 2014 AI identified the lack of available housing as an impediment to fair housing choice, indicating that “Housing shortages increase the probability of housing discrimination by creating competition that can be used to disguise unlawful discrimination practices.” The AI indicated the County EDA needed to “increase the number of agency funded affordable single and multi-family housing projects.”

2019 Status: Removed. Similar to housing affordability, housing availability is not a fair housing issue per se unless combined with bias against a protected class. The Jurupa Valley AI did not reveal specific information indicating that a shortage of affordable housing constituted an impediment to fair housing choice. Rather, the lack of available housing is a housing market condition whereby there are an insufficient number of units available to accommodate individuals and households at all income levels.



Although removed as a listed impediment to fair housing choice in this AI, the City recognizes that a lack of available housing—particularly for low- and moderate-income people—has the potential to disproportionately affect members of protected classes. The City has adopted policies and programs in its Housing Element to encourage, and where possible, assist in the development of quality housing to meet the City’s share of regional housing needs for all income levels and special needs populations.

Rental Advertising and Viewing the Unit

The 2014 AI indicates that “Potential renters most often begin their search for a home from advertising material. Unfortunately, the language used is often improper and even the use of models may indicate a preference and can be a potential problem. Advertising a “no pets” policy can also be an impediment to Fair Housing if the housing provider is not aware that a service or companion animal is not a pet.”

Further, the 2014 AI indicates that “One of the most common discrimination a potential renter may encounter is when viewing the unit. Housing providers may make a judgment based on one’s race, disability, familial status or other characteristic when determining qualifications. In some cases, potential renters are quoted different terms and conditions than other potential renters because of the housing provider’s discriminatory actions.”

2019 Status: Addressed. FHCRC continues to provide information and education services concerning the proper way to advertise housing opportunities and to show housing opportunities to prospective tenants. In workshops and fair housing training, FHCRC encourages rental property owners, managers, and realtors to provide written documentation to all applicants which include the listings of all available housing, standard information on the terms and conditions of the application process, posting Fair Housing informational signs and providing Fair Housing literature. Further, FHCRC conducts paired-testing audits under its Fair Housing Initiatives Program grant to identify large-scale abuses such as preferential treatment by management companies and leasing agents based on protected status.

Credit Check / Leasing Issues

The 2014 AI indicates that “Potential renters may be asked to produce documentation regarding credit history, current and previous addresses and landlords, as well as employment history/salary. Qualifications criterion for tenant selection, if any, are usually not known to those seeking to rent. Although housing providers may set qualification guidelines that screen potential tenants, in many instances poor credit or rental history is used as a reason for denial as a way to exclude certain protected classes.”

Further, the 2014 AI indicates that “Most leases and rental agreements are standard for all units within the same community. The enforcement of the rules in the lease or rental agreement, however, may not be uniform for all tenants. Housing providers may choose strict enforcement



of the rules for certain tenants based on discriminatory factors, such as familial status, race or disability, as well as arbitrary factors such as tattoos or body piercing.”

2019 Status: Addressed. This issue illustrates the fine line between landlord/tenant issues and bona-fide fair housing discrimination. Over the last five years, FHCRC has encouraged rental property owners, managers, and realtors to provide written documentation to all applicants that includes the listings of all available housing, standard information on the terms and conditions of the application process, such as income qualifications, down payments, and other fees and expenses, posting Fair Housing informational signs and providing Fair Housing literature. These best practice recommendations serve to protect the interests of both the landlord and the tenant or prospective tenant.

FHCRC quarterly reports for 2018/2019 in Jurupa Valley that 94 percent of tenants requesting assistance are in-place tenants, indicating problems with new lease agreements are not prevalent.

Predatory Lending / Steering

The 2014 AI indicates that “Predatory lending occurs when a variety of characteristics are present during the lending process or in the final mortgage loan itself. These characteristics include targeting specific groups for mortgage loans, unreasonable loan terms, and fraudulent behavior by the lender. Given the financial dangers associated with subprime loans, prepayments penalties, excessive fees, exaggerated incomes and abusively high rates, it is clear that discrimination found in the subprime market constitutes a grave threat to the financial well-being of America’s already underserved populations.”

Further, the 2014 AI indicates that “When Caucasian purchasers are discouraged from neighborhoods of color, while African American purchasers are steered toward those same neighborhoods, there is a clear violation of the Federal Fair Housing Act. Sometimes real estate agents steer by limiting the location of homes they show buyers. In other cases, real estate agents steer by making comments and editorializing about communities and neighborhoods.

2019 Status: Continued. While the 2019 Riverside County AI concluded that in 2017, not one low-income minority group had a loan approval rate (purchase, refinance or home improvement) that was disproportionately lower than non-Hispanic White applicants, this is not consistent with the findings in Jurupa Valley. Based on review of Mortgage Disclosure Act (HMDA) data for 2017, mortgage loan denial rates among African American applicants in Jurupa Valley were significantly higher at 27.5 percent, than for any other racial or ethnic group, including Hispanics (15%), non-Hispanic Whites (14.2%), and Asians (13.5%).

Furthermore, two middle- and upper-income census tracts (tracts 402.02 and 406.07) have approximately half of all African American loan denials during the past five-year period (2013-2017). The two tracts are in diverse sections of the City and not in areas with high minority racial percentages. The City will continue to monitor loan denial rates in these census tracts and discuss concerns with the community’s major mortgage lenders.



Habitability / Constructive Evictions

The 2014 AI indicates that “The California Supreme Court has recognized that every residential lease carries with it an implied warranty of habitability. California Civil Code §1942 gives tenant two options if the premises are uninhabitable: repair the problems and deduct the cost from the rent, or move out. This creates a situation where although the remedies of “repair and deduct” or “move out” are great on paper, yet in practice they are too risky for tenants to truly benefit from them. This creates an impediment to Fair Housing because tenants then come to accept the substandard living conditions as unavoidable. Low income families are often the most impacted by substandard living conditions, which makes the need to address this impediment to Fair Housing all the more important.”

Further, the 2014 AI indicates that “Another impediment to Fair Housing that is related to habitability is the constructive eviction. A constructive eviction occurs when a landlord takes actions that interfere with the tenant's use and enjoyment of the premises in a significant way. Some of the tactics that landlords engage in that may result in a constructive eviction are cutting off the tenant’s utilities or other essential services; harassing the tenant, whether verbally, physically, or emotionally; or blocking the tenant’s access to the unit, such as changing the locks.” The 2014 AI included a recommendation to “Continue to develop, expand, and provide more education and outreach to housing providers, community organizations, and the general public regarding housing discrimination, fair housing laws, and services provided by the Fair Housing Council.”

2019 Status: Removed. Upon review, there was insufficient publicly available data to support inclusion of this landlord-tenant issue as an impediment to fair housing choice.

Other Lending / Sales Concerns

The 2014 AI indicates that “Other impediments to Fair Housing in the lending and sales market that do not involve predatory lending are differential treatment of minorities or low-income individuals in the lending process and real estate agents refusal to deal with transactions for properties valued less than \$100,000 or so. These are yet additional hurdles for low-income individuals and are impediments to Fair Housing that needs to be addressed.”

The 2014 AI recommended that the County contract with the FHCRC to conduct audit testing. Continue to develop, expand, and provide more education and outreach to housing providers, community organizations, and the general public requesting housing discrimination, fair housing laws, and services provided by the Fair Housing Council. Continue homebuyer education programs and ongoing education for participants in the first-time homebuyer program that the Fair Housing Council offers.

2019 Status: Addressed. The County supported the development and expansion of education and outreach to housing providers, community organizations, and the general public requesting



housing discrimination, fair housing laws, and services provided by FHCRC. FHCRC provided 20 first-time homebuyer workshops during fiscal year 2017-18 throughout Riverside County.

Discrimination against Persons with Disabilities

The 2014 AI states that “Impediments to Fair Housing for individuals with disabilities are finding housing that meets their specific criteria, having full use and enjoyment of their current dwelling, and housing discrimination. Thankfully, privately owned and publicly assisted housing must meet the accessibility requirements of the Fair Housing Act. Still, only buildings of four or more units built after March 13, 1991 are subject to these requirements.”

The 2014 AI indicated that 47 percent of discrimination complaints over the 2008-2013 period were based on disability, whereas the Riverside County 2019 AI reports that 63 percent of discrimination complaints between 2013-2018 were on the basis of physical or mental disability. Among the 21 discrimination complaints recorded in 2018/2019 by the FHCRC in Jurupa Valley, 16 were based on a physical disability and one on a mental disability, totaling 81 percent of all complaints.

The high proportion of disability complaints to FHCRC is consistent with other communities in the area and is also consistent with data at the state and federal level. Fair housing discrimination on the basis of disability demonstrates a lack of understanding in the housing industry of the housing rights of persons with disabilities. Disabled persons are experiencing difficulties when requesting reasonable accommodations or modifications.

2019 Status: Continue. While the FHCRC has provided education and outreach to help try to alleviate discrimination against persons with disabilities, given its continued prevalence, this impediment has not been adequately addressed and remains a high priority in this AI.



7. Conclusions and Recommendations

The Jurupa Valley AI evaluates a wide range of housing issues and potential barriers to fair housing. The following section builds upon this analysis, outlines conclusions, and provides recommendations for the City and its community partners to address identified impediments to fair housing choice.

Summary of Conclusions/Findings

The following summarizes the key findings from the AI:

Community Profile

- In 2017, over one-quarter of the City's population was under the age of 18 years and almost 10 percent was 65 years and over. These two age groups are an indicator of the reliance of **children and senior citizens** on the working age population, also known as the dependency ratio. Lower the dependency ratio, the lesser the "burden" is on a community's working age residents. Jurupa Valley's dependency ratio is 0.59 as compared to a countywide of 0.65, and thus, faces a lesser burden on working age residents.
- The **Hispanic ethnic population** represent over two-thirds of the City's total population, which is higher than the countywide total of 48 percent. All minority groups in the City account for over three-quarters of the City total population.
- The majority (52%) of Jurupa Valley households spoke Spanish as their primary language. Sixteen percent of these **Spanish-speaking households** had limited English proficiency and are considered linguistically isolated. Although smaller in number, households that spoke Asian/Pacific Islander languages as their primary language, had the largest degree of linguistic isolation at 21 percent.
- The **Section 8 Housing Voucher Program** administered by the Housing Authority of Riverside County (HARC) assisted 344 low-income renters living in Jurupa Valley. The majority of these renters are senior and/or disabled households. The Hispanic population is under represented in the program. Approximately one-quarter of the voucher holders identified as Hispanic; however, the Hispanic ethnic population represents two-third of the City's total population. In 2018, approximately 1,700 households were on the waitlist for federal rental assistance.
- **Seniors** (age 65+) represent 9.4 percent of Jurupa Valley's population. Some of the characteristics of elderly residents included: limited mobility; increased medical attention due to health complications; and, restricted fixed income, such as Social



Security, pension programs and retirement income. Many elderly people also have difficulty completing normal, everyday tasks without assistance. The 2013-2017 ACS data estimate that approximately two-thirds of the Jurupa Valley's elderly had ambulatory difficulty, which is the highest percentage of the six disability categories classified by the U.S.

- The number of Jurupa Valley residents age 18 and older with some type of **disability** totaled about 11 percent of the City's total population of the same age group. The top three disabilities among persons age five and older include those with ambulatory difficulty, independent living difficulty, and cognitive difficulty. It was estimated that approximately two-thirds of the City's elderly population had ambulatory difficulty.
- Over one-half of the homes in Jurupa Valley are about 40 years and older. This compares to about one-third of the homes countywide. In general, homes built more than 30 years ago are likely to require structural renovation and increased maintenance, resulting in greater costs for the owner. **Older homes** can also create health and safety problems for occupants, as many deteriorated structures often do not meet current building code standards and lack safety features such as fire suppression, home security devices, and seismic safety retrofits. In addition, there are greater lead-based paint related health risks.
- The **2019 Point-In-Time Homeless Count** reported there were 139 unsheltered homeless individuals counted in the City of Jurupa Valley. Over one-half of homeless person were White and about one-third Hispanic (many of the Hispanics were also considered White). Over one-third were chronically homeless, 15 percent had a mental health condition, and over one-quarter had a physical or developmental disability. No children or families with children were interviewed in the count.
- The average household size in Jurupa Valley was 4.0 as compared to 3.3 countywide. About 30 percent of the City's households were considered **large households** (5 or more persons per household). Large households are a special needs group because of the lack of available affordable housing of adequate size. To save for necessities such as food, clothing, transportation, and medical care, lower- and moderate-income large households may reside in smaller units, resulting in overcrowding.
- **Overcrowding** (defined as more than one person per room) occurred in 11 percent of the City's total occupied units and severe overcrowding (more than 1.5 persons per room) occurred in five percent of the total occupied units. More overcrowding occurred in rental units than owner-occupied units. This indicates the need for larger rental units and/or more rental subsidies to allow large households to afford adequately sized units.
- The most prevalent housing problem facing Jurupa Valley households was **overpayment on housing cost**. A household is considered to be overpaying for housing if housing costs (rent plus utilities) make up more than 30 percent of the household's gross monthly income. Overpaying occurred with 41 percent of the total occupied units. Renter households tended to overpay more for housing than owners occupied households.



Fair Housing Profile

- **Fair housing education and outreach** to housing providers and owners is provided through the Fair Housing Council of Riverside County (FHCRC), the California Apartment Owner's Association (CAA), and for properties with Section 8 rent vouchers, the Housing Authority of the County of Riverside (HACR). Given the characteristics of Jurupa Valley's apartment stock as predominately older and in smaller complexes, a large segment of the City's rentals are not managed by professional management companies and small "mom and pop" managers may not be trained in fair housing laws. As small property managers/owners are typically the primary violators of fair housing laws, targeted outreach to this group by the FHCRC remains critical.
- Consistent with state and national trends, the **leading basis of discrimination complaints** in Riverside County over the past five years (7/2013-6/2018) are as follows: physical disability (51%), mental disability (12%), race (10%), familial status (8%), national origin (7%), and sex (3%). In Jurupa Valley's first year contracting with FHCRC, 21 discrimination cases were opened, including 16 related to physical disability, and one case based on each of the following protected classes: mental disability, race, familial status, sex and age. It will be important to monitor discrimination complaints in the City over time to more fully assess patterns and to appropriately tailor FHCRCs outreach.
- There is a gap in understanding by many landlords about the requirements under the Federal fair Housing Act to provide **reasonable accommodation or reasonable modifications** for persons with disabilities. Lack of understanding of these Federal requirements is a leading reason why persons with disabilities encounter discrimination when seeking housing or attempting to maintain their housing.
- **Hispanics** comprise over two-thirds of Jurupa Valley's population, yet reflect less than half of the landlord/tenant calls received by the FHCRC over the past year. This could indicate the City's Hispanic population is not fully aware of the landlord/tenant services available to them.

Public Sector Impediments

- There is currently no mechanism specified in the Zoning Code to allow **reasonable accommodation exceptions** to zoning requirements for individuals with disabilities. This process should be placed in the Code to ensure that it is formalized and consistently applied.
- The narrow **definition of "family"** in the City's Zoning Code could potentially be used to limit unrelated persons from residing together in single-family zones. In order to provide greater clarity and eliminate any potential constraint to non-traditional households, the City should update this definition consistent with State law.
- Providing development opportunities for a **variety of housing types** helps to address the diverse range of housing needs present in a community. Senior citizens, persons with



disabilities, veterans, and persons suffering from homelessness, among others, may require non-traditional housing types. As required under state and federal law, Jurupa Valley's Zoning Code needs to be amended to better facilitate the following types of housing: residential care facilities, SROs, transitional and supportive housing, emergency homeless shelters, and farm worker/employee housing.

- Based on the affordability gap analysis conducted in the City's Housing Element, market rents in Jurupa Valley are beyond the level of affordability of lower income (<80% AMI) households, and housing sales prices are beyond the level of affordability of moderate income (<120% AMI) households. Local tools including **inclusionary zoning and density bonuses** can be used to facilitate the production of units affordable to low- and moderate-income households, and further goals for economic integration.

Private Sector Impediments

- The **approval rate for home purchase loans** in Jurupa Valley in 2017 was below the Countywide average by 3.5% (84.5% compared to 88.0% for Riverside County). In general, all nearby counties had similar home purchase approval rates.
- **Mortgage loan denial rates** in Jurupa Valley were higher than Riverside County. The lowest denial rates in Jurupa Valley were among Hawaiian/Pacific Islanders (7.1%), followed by Asians (13.5%), and Whites (14.2%). Denial rates of Hispanics were at 15.0%, with African Americans having the highest denial rates at 27.5%. Countywide loan denial rates were higher among African Americans (16.2%), Hispanic (12.4%) and Asian (13.0%) applicants than Whites (11.0%).
- **Census tracts 402.02, and 406.07** have approximately half of all African American loan denials during the past five-year period (2013-2017). These two areas are in census tracts that are in middle and upper income levels of Jurupa Valley. The two census tracts are in diverse sections of the City and not in areas with high minority racial percentages. The City should continue to monitor loan denial rates in these census tracts and discuss concerns with the community's major mortgage lenders. Though, it should be noted that while Citywide, African Americans make up 3.0 percent of the population in 2017 African Americans comprised 3.8 percent of home purchase loans in 2017.
- **Realtors and Property Managers** participating in the City's AI outreach efforts were not aware of any discriminatory practices in Jurupa Valley.
- **City and Other Staff** that has extensive contact with residents of Jurupa Valley, in departments such as City Planning, Development Services/Economic Development, Engineering, Building and Safety, and Police (Riverside Sheriff's Department) were not aware of any discriminatory practices in Jurupa Valley. They had not received any complaints from residents.



Recommended Actions to Address Impediments

Recommendations are organized by activity type as outlined in HUD's 1998 Fair Housing Planning Guide. The recommendations listed below are primarily implemented by the Fair Housing Council of Riverside County (FHCRC), with coordination and oversight by the City's Development Services Department.

1. Education and Outreach Activities

Action 1.1: In partnership with the FHCRC, conduct multi-faceted fair housing outreach to Jurupa Valley tenants, landlords, property owners, realtors, and property management companies. Methods of outreach will include workshops, informational booths at community events, presentations to civic leaders and community groups, public service announcements, and distribution of multi-lingual fair housing literature. Ensure the Hispanic community is provided with accessible information on available fair housing and landlord/tenant services.

Action 1.2: Ensure the FHCRC conducts focused outreach and education to small property owners/landlords on fair housing, and reasonable accommodation and reasonable modification issues in particular. FHCRC will continue to conduct property manager trainings on a regular basis, targeting managers of smaller properties, and promote the California Certified Resident Manager program offered through the California Apartment Association.

Action 1.3: Encourage the FHCRC and Housing Authority of Riverside County work to enhance access to services and housing for residents with limited English proficiency. For the federal CDBG program, the City will provide public notices in English and Spanish, and ensure translators are available at public meetings.

Action 1.4: Contact the Housing Authority of Riverside County (HARC) regarding the apparent under-representation of Hispanic households in the Housing Choice Voucher program. As warranted, request that HARC conduct targeted outreach as defined in its Administrative Plan.

2. Enforcement Activities

Action 2.1: Continue to provide investigation and response to allegations of illegal housing discrimination through the FHCRC. For cases that cannot be conciliated, the FHCRC will refer case to the Department of Fair Housing and Employment (DFEH), U.S. Department of Housing and Urban Development (HUD), small claims court, or to a private attorney, as warranted.



Action 2.2: On an annual basis and in coordination with the FHCRC, review discrimination complaints to assess Jurupa Valley trends and patterns over time, and tailor fair housing education and outreach accordingly.

Action 2.3: Continue to work with FHCRC to provide general counseling and referrals over the phone regarding tenant-landlord issues.

3. Monitoring Lending, Housing Providers, and Local Real Estate Practices

Action 3.1: City shall contract with an organization to assist in monitoring mortgage loan denial rates among African American households and in census tracts 402.02, and 406.07 that have had approximately half of all African American loan denials during the past five years through annual review of Home Mortgage Disclosure Act (HMDA) data. As warranted, contact the City's major mortgage lenders to discuss the City's concerns.

Action 3.2: City may contract with an organization to help protect homeowners from mortgage rescue fraud by promoting the use of HUD-certified, non-profit mortgage counseling agencies on the City's website and other means.

Action 3.3: City may contract with an organization to help coordinate with local realtors and conduct outreach to the local real estate community on predatory mortgage lending practices, loan modification scams, and the rights of tenants in foreclosed properties. The Jurupa Valley Chamber of Commerce, which has members that are realtors and real estate lenders, could be a key organization to contact for this Action.

Action 3.4: Through the Fair Housing Council of Riverside County (FHCRC), monitor on-line advertising of rental housing for fair housing violations on a quarterly basis, investigate if warranted, and refer to California Department of Fair Employment and Housing (DFEH) for possible enforcement. Take steps to encourage the Press Enterprise to publish a Fair Housing Notice and a "no pets" disclaimer in the For Rent Classified section.

Action 3.5: Continue to include non-discriminatory and fair housing language in all City affordable housing contracts and agreements.

4. Land Use Policies to Affirmatively Further Fair Housing

Action 4.1: Develop formal, written procedures for reasonable accommodations and modifications to facilitate accessibility improvement requests through modifications in zoning, building codes, and permit processing.

Action 4.2: In order to eliminate potential impediments to housing choice for non-traditional households, update the definition of "family" in the Zoning Code to remove: 1) any reference to the number of persons that can be considered a "family," and 2) any reference to how members of a "family" are to be related.

Action 4.3: Amend the Zoning Code to specify provisions for small (6 or fewer) licensed residential care facilities consistent with the Lanterman Act.



- Action 4.4:** As a means of expanding housing choice for extremely low income renters, including persons with disabilities and veterans, amend the Zoning Code to include provisions for single room occupancy units (SROs).
- Action 4.5:** Amend the Zoning Code to include provisions for transitional and supportive housing in all zone districts where other residential uses are permitted and only subject to those restrictions that apply to other residential uses of the same type in the same zone.
- Action 4.6:** Continue to accommodate emergency homeless shelters as a permitted use in the Industrial Park (I-P) zone. Eliminate the current distance requirements for emergency shelters that extend beyond the basic 300-foot distance between two shelters as permitted by SB 2.
- Action 4.7:** Amend the Zoning Code for consistency with the California Employee Housing Act which requires that housing for six or fewer employees be treated as a regular residential use.
- Action 4.8:** Amend the Zoning Code to eliminate the requirement for discretionary review for multi-family development in multi-family residential zones to better facilitate permit processing for projects that conform to the General Plan and Zoning Ordinance development standards.

5. Increasing Geographic Choice in Housing

- Action 5.1:** While housing affordability is not a fair housing issue per se, providing a variety of housing opportunities can help lessen the likelihood of housing discrimination by increasing the supply. Jurupa Valley will facilitate the provision of affordable housing throughout the community through: 1) available financial assistance; 2) flexible development standards; 3) density bonuses; and 4) consideration of development fee waivers.
- Action 5.2:** Implement the new Mixed Use Overlay and Town Center Overlay land use designations established as part of the City's General Plan, and designate additional sites Highest Density Residential (HHDR) to provide expanded areas for higher density residential development. Work with the Riverside County Housing Authority, housing non-profits and housing developers to identify specific sites for developing housing suitable to very low income households, including seniors, disabled persons, veterans, farm workers and the homeless.
- Action 5.3:** Continue to implement and update the existing Inclusionary Housing Program (IHP) previously administered by the County of Riverside.
- Action 5.4:** Update the City's Zoning Code to reflect current State density bonus law to better facilitate the provision of mixed income housing.



I, Alan Kreimeier, City Manager, hereby certify that this Analysis of Impediments to Fair Housing Choice for the City of Jurupa Valley represents the City's conclusions about impediments to fair housing choice, as well as the actions necessary to address any identified impediments.

Alan Kreimeier, Interim City Manager
City of Jurupa Valley

Date _____



Appendix A
Fair Housing Survey
&
Summary of Results



City of Jurupa Valley Analysis of Impediments to Fair Housing Choice Housing Impediment Survey

The City of Jurupa Valley is administering this housing survey to review the opportunities and problems associated with people's ability to attain housing within the City. Please take a few minutes to fill out this survey. Your answers will be kept confidential. Your participation will assist the City in establishing a plan to improve opportunities for fair housing choice.

1. Please enter your ZIP Code: _____

2. Do you own or rent your home?

- Own
- Rent

3. What is your gender?

- Male
- Female
- Other: _____

4. Age:

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

5. Race (please select one or more):

- White
- Black
- Asian
- American Indian or Alaska Native
- Native Hawaiian or Other Pacific Islander
- Other (please specify)



6. Ethnic Category

- Hispanic or Latino
- Non-Hispanic or Latino

7. Do you have a disability?

- Yes
- No

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

- Yes
- No

9. Have you ever encountered any form of housing discrimination or known someone who has?

- | | | |
|-----------------------|-----------------------|-----------------------|
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Yes | No | Not Sure |

10. If you believe or think that you or someone you know has been subjected to housing discrimination, please choose the type that best describes it (select all that apply):

- Refusing, discouraging or charging more to rent an apartment or buy a home.
- Discouraging a person from living where he/she wants to live. Steering him/her to another apartment, complex or neighborhood.
- Refusing, discouraging, making it difficult, charging more or providing less favorable terms on a home loan.
- Refusing, discouraging or charging more for home insurance.
- Refusing to make reasonable accommodation or not allowing a modification to be made to make an apartment more accessible for a person with a disability.
- Predatory lending: unfair, misleading and deceptive loan practices.
- Other (Please specify): _____



11. If you experienced housing discrimination: What was the basis of the discrimination?

- Race
- Color
- Marital Status
- National Origin
- Gender Identity
- Age
- Religion
- Family Status (e.g. single parent with children)
- Disability – Mental Conditions
- Sex
- Ancestry
- Sexual Orientation
- Source of Income
- Other (please specify) _____



12. If you were a victim of housing discrimination, in what neighborhood did it occur?

13. Do you feel that you are well-informed on housing discrimination?

- Yes
- No
- Somewhat
- Not Enough

14. What would you do if you encountered housing discrimination?

- Ignore It
- Report It
- Don't Know

15. If you were to report housing discrimination, who would you report it to?

- City of Jurupa
Valley
- Riverside
Fair
Housing
Council
- Don't Know
- Other: _____

16. If you think that housing discrimination is occurring, what types of discrimination do you think are the largest problem in Jurupa Valley?



17. What can be done to prevent housing discrimination in Jurupa Valley?

18. Please provide any additional comments you may have on fair housing.

Your input is greatly appreciated!



Thank you for taking the time to fill out this survey. Please mail the completed survey to:

City of Jurupa Valley

8930 Limonite Avenue

Jurupa Valley, CA 92509

Attn: Sean McGovern

smcgovern@jurupavalley.org

We rely on your feedback to help us improve our City services. For questions on this survey, or if you would like to obtain more information on fair housing, please contact the City of Jurupa Valley at (951) 332-6464 x249.

In addition, if you feel you have been discriminated against, please contact the City's fair housing service provider- Fair Housing Council of Riverside County at (951) 682 - 6581.

Every effort will be made to reasonable accommodate individuals with disabilities by making survey material available in alternative formats. Requests for assistance should be made to Sean McGovern - Senior Management Analyst at (951) 332-6464 x249, or by visiting the Jurupa Valley City Hall at 8930 Limonite Avenue, Jurupa Valley, CA 92509.



City of Jurupa Valley
Analysis of Impediments to Fair Housing Choice
Housing Impediment Survey
Summary of Complete Results - September 18, 2019

The City of Jurupa Valley administered this housing survey to review the opportunities and problems associated with people's ability to attain housing within the City. Participation will assist the City in establishing a plan to improve opportunities for fair housing choice.

52 Responses submitted – all English language surveys (none in Spanish)

1. Please enter your ZIP Code:

(92509: 35-67.0%) + (91752: 13-25.0%) + (No Zip: 4-7.7%) = 52 Responses

2. Do you own or rent your home?

- Own – 78.9 %
- Rent – 21.1 %

3. What is your gender?

- Male – 21.2 %
- Female- 78.9 %
- Other: _____

4. Age:

- 18-24 – 0.0 %
- 25-34 – 15.7 %
- 35-44 – 27.5 %
- 45-54 – 17.7 %
- 55-64 – 29.4 %
- 65 + - 9.8 %



5. Race (please select one or more):

- White – 75.0%
- Black – 3.9 %
- Asian – 3.9 %
- American Indian or Alaska Native -3.9%
- Native Hawaiian or Other Pacific Islander – 0.0 %
- Other (please specify) – 13.5% (2 Hispanic/Latina, 1 East Indian, 1 not listed)

6. Ethnic Category

- Hispanic or Latino – 31.8 %
- Non-Hispanic or Latino – 68.6 %

7. Do you have a disability?

- Yes – 13.7 %
- No – 86.3 %

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

- Yes – 37.25 %
- No – 62.75 %

9. Have you ever encountered any form of housing discrimination or known someone who has?

19.2%	76.9 %	3.9 %
Yes	No	Not Sure



10. If you believe or think that you or someone you know has been subjected to housing discrimination, please choose the type that best describes it (select all that apply):

- 42.9% Refusing, discouraging or charging more to rent an apartment or buy a home.
- 23.8% Discouraging a person from living where he/she wants to live. Steering him/her to another apartment, complex or neighborhood.
- 19.0 % Refusing, discouraging, making it difficult, charging more or providing less favorable terms on a home loan.
- 0.0 % Refusing, discouraging or changing more for home insurance.
- 4.7 % Refusing to make reasonable accommodation or not allowing a modification to be made to make an apartment more accessible for a person with a disability.
- 19.0 % Predatory lending: unfair, misleading and deceptive loan practices.
- 38.1% (7 answered NONE) Other (Please specify)

11. If you experienced housing discrimination: What was the basis of the discrimination?

- 11.1 % Race
- 5.6 % Color
- 0.0 % Marital Status
- 11.1 % National Origin
- 0.0 % Gender Identity
- 16.7 % Age
- 0.0 % Religion
- 5.6 % Family Status (e.g. single parent with children)
- 0.0 % Disability – Mental Conditions
- 0.0 % Sex
- 0.0 % Ancestry
- 0.0 % Sexual Orientation
- 11.1 % Source of Income
- 38.9 % (1 responded ‘Age AND Income’ and 3 ‘none’), Other (please specify) _____



12. If you were a victim of housing discrimination, in what neighborhood did it occur?

14 responses: 2 in Riverside, 1 Jurupa Valley, 1 Glen Avon, 1 Canyon Crest, 1 Creekside Ontario – San Bernardino, 1 Garden Grove & 7 wrote N/A, not applicable or other none-type answer.

13. Do you feel that you are well-informed on housing discrimination?

40.4 %	21.3 %	31.9 %	6.4 %
Yes	No	Somewhat	Not Enough

14. What would you do if you encountered housing discrimination?

9.8 %	66.7 %	23.5 %
Ignore It	Report It	Don't Know

15. If you were to report housing discrimination, who would you report it to?

19.6 %	49.0 %	27.5 %	3.9 %
City of Jurupa Valley	Riverside Fair Housing Council	Don't Know	Other: 1 DFEH, 1 Fam & Friends



16. If you think that housing discrimination is occurring, what types of discrimination do you think are the largest problem in Jurupa Valley? (15 Responses)

7 - age, income, race, ethnicity, against African Americans or multi-generational families.

1 - Low income housing and single mothers help with housing and transportation

1 - Indian hills

1 - I think over priced houses so people can't afford

1 - Homeless population

3 - No clue, Not sure, "X"

1 - Loans



17. What can be done to prevent housing discrimination in Jurupa Valley? (14 Responses)

7 - Provide education to the community, so that their aware and know what to look for. Educate our community and inform them of their rights and where to go to if they experience discrimination. Four other education comments.

1 - Information dissemination. Enforcement when it occurs

1 - Get rid of hate and greed.

1 - I don't know but there needs to be more funding to help single moms like me and not so many restrictions

2- I don't know No clue

1 - Have a place to report it. Warn renters

1 - Nothing



18. Please provide any additional comments you may have on fair housing. (7 comments)

1. Seniors own their mobile homes and are being forced out of their last homes by greedy park owners and exorbitant space rental raises--well over \$1000 a month

1. I need housing for myself and my 11 year old daughter

1. None

1. Education needs to be provided in multiple languages.

1. I've never had any discrimination issues at all here in JV. Lived here for 28 years and have always felt welcome.

1. Fair housing

1. None



Appendix B

Public Comments

After the 30-day review period was completed - from November 6, 2019 to December 5, 2019 – there were no written comments received from the public, nor were there any comments made by the public at the December 5, 2019 Public Hearing at Jurupa Valley City Hall.