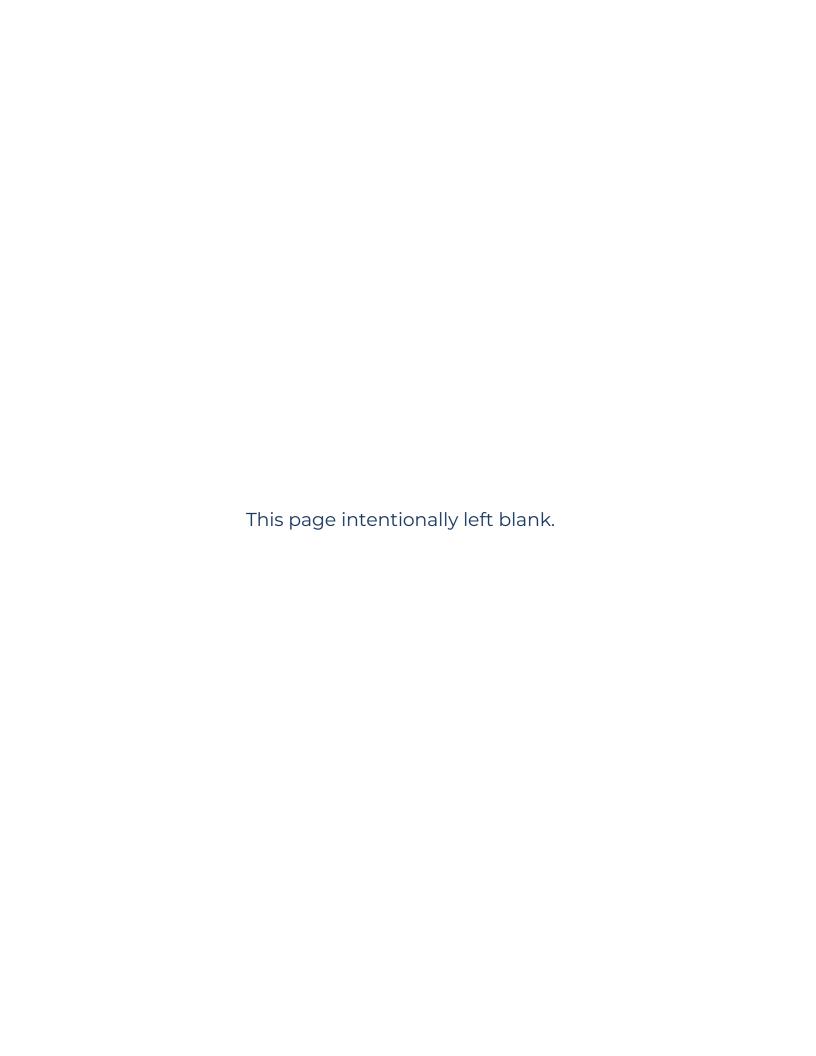


ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

U.S. Department of Housing and Urban
Development Grant Programs

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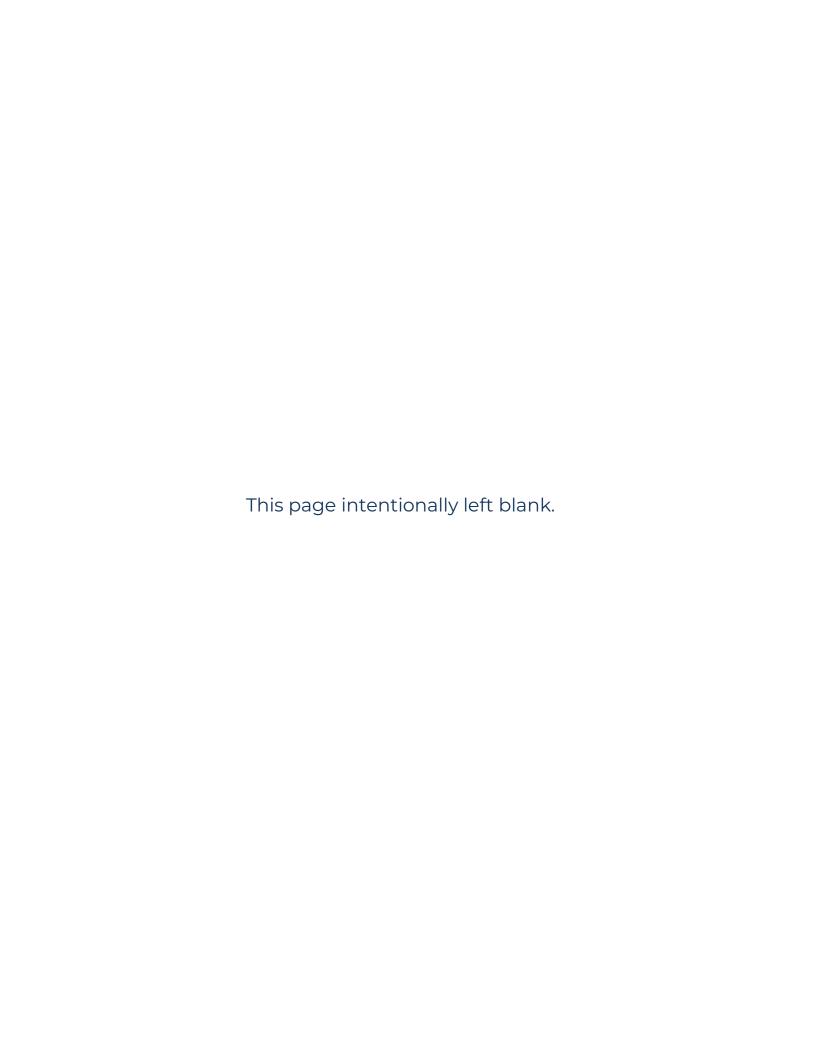
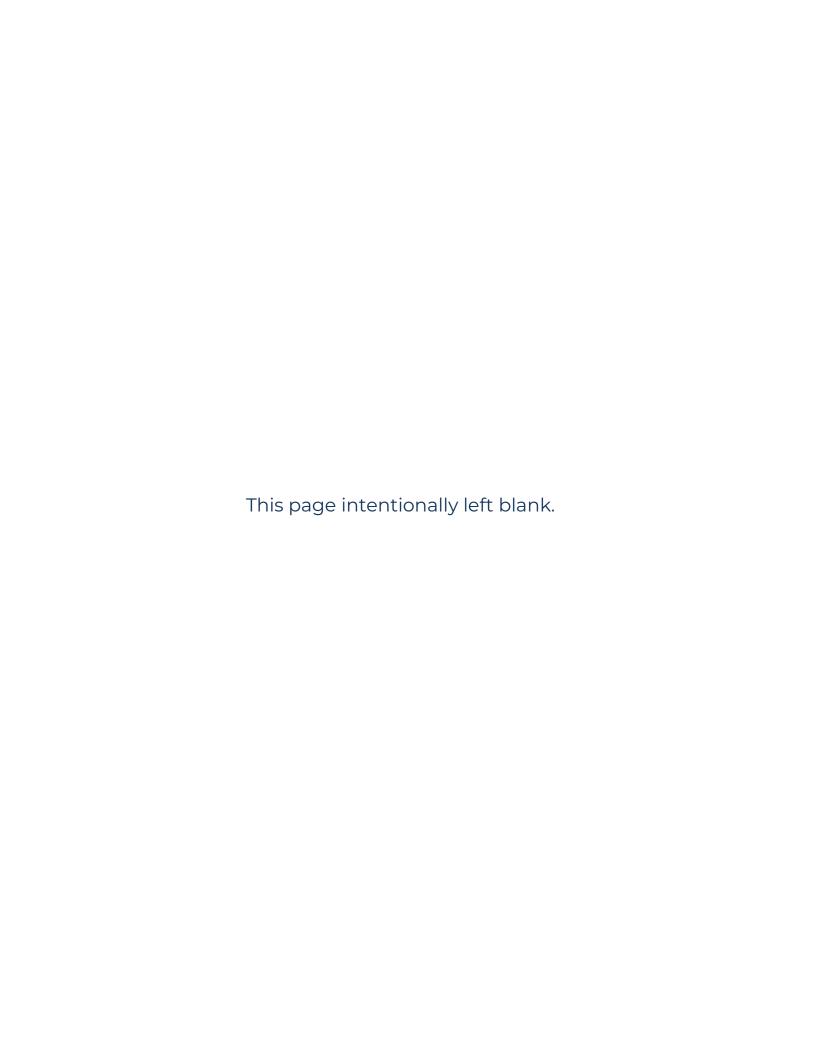


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Executive Summary

Background

Fair housing is 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, age, sex, disability, marital status, familial status, or any other arbitrary factor. The Analysis of Impediments to Fair Housing Choice (A.I.) provides an overview of laws, regulations, conditions or other possible obstacles that may affect an individual or household's access to housing.

Equal access to housing for all is fundamental to each person in meeting essential needs and pursuing personal, educational, employment, or other goals. Recognizing this fundamental right, the federal and State of California governments have both established fair housing as a right protected by law.

Fair housing is 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, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor. The A.I. examines local housing conditions, economics, policies and practices in order to ensure that housing choices and opportunities for all residents are available in an environment free from discrimination. The AI assembles fair housing information, identifies existing impediments that limit housing choice, and proposes actions to mitigate those impediments.

Equal access to housing (housing choice) is vital to meeting essential needs and pursuing personal, educational, employment, or other goals. Recognizing this fundamental right, the federal government and the State of California have established fair housing as a right protected by law.

Fair Housing Laws

In an effort to end housing segregation, the United States Congress passed the Civil Rights Act of 1968, making housing discrimination based on race, color, national origin, or religion illegal. In 1974, Congress amended the Fair Housing Act to include sex as a protected category. Then in 1988, Congress again amended the Fair Housing Act by passing the Fair Housing Amendments Act1, making housing discrimination against families with children and people with disabilities unlawful. The Fair Housing Amendments Act also incorporated accessibility standards for new multi-family units and "reasonable accommodations" for people with disabilities into the Fair Housing Act.

In addition to prohibiting discrimination based on federal laws, the State of California has enacted several statutes that mirror and, in certain cases, extend federal fair housing

¹42 U.S. Code §§ 3601 et. seq.

protections. The Unruh Civil Rights Act of 19592 and subsequent court decisions require equal access to the accommodations, advantages, facilities, privileges, or services of all business establishments regardless of protected status. The courts have interpreted this Act to prohibit any arbitrary discrimination based in any class distinction, regardless of whether or not that basis is enumerated in the Act.

The Fair Employment and Housing Act of 19633 is the primary state law that prohibits discrimination in the sale, rental, lease negotiation, or financing of housing based on race, color, religion, sex, marital status, national origin, and ancestry. The California Fair Housing Act of 1992 brought state laws into conformity with the Federal Fair Housing Act of 1988 and added protections for people with a "mental and physical disability" and "familial status." The Act also requires that housing providers allow disabled persons to modify their premises to meet their needs.

The Ralph Civil Rights Act of 1976 provides that all persons have the right to be free from any violence, or intimidation by threat of violence, committed against their persons or property because of their race, color, religion, ancestry, national origin, political affiliation, sexual orientation, sex, age, disability, or position in a labor dispute. The Act prohibits violence or threat of the same in rental housing situations. The Banes Civil Rights Act also forbids interference by force or threat with an individual's constitutional or statutory rights in places of worship, housing, and private property.

The Federal protected classes include:

- Color
- Disability⁴
- Familial status
- National origin
- Race
- Religion
- Sex

The additional State of California protected classes include:

- Age
- Ancestry
- Arbitrary discrimination
- Gender
- Gender identity
- Gender expression
- Genetic information

²California Civil Code, §§ 51 and 52

³California Government Code §§ 12900-12906

⁴ The Fair Housing Act uses the term 'handicap,' however, we use the term "person with a disability," to represent this language of the Act.

- Marital status
- Sexual orientation
- Source of income

This report considers impediments to fair housing choice experienced by both federal and State of California protected classes.

Defining Fair Housing and Impediments

In consideration of federal and state fair housing laws and in consultation with the U.S. Department of Housing and Urban Development (HUD) and professionals providing fair housing services, the following definition of fair housing is used for this report:

Fair housing is a condition in which individuals of similar income levels in the same housing market having a like range of housing choice available to them regardless of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income or any other arbitrary factor.

Within the legal framework of federal and state laws and based on the guidance provided by HUD Fair Housing Planning Guide (1996), impediments to fair housing choice can be defined as:

Any actions, omissions, or decisions taken because of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor which restrict housing choices or the availability of housing choices; or

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, national origin, religion, sex, disability, familial status, ancestry, age, marital status, gender, gender identity, gender expression, genetic information, sexual orientation, source of income, or any other arbitrary factor.

To affirmatively promote equal housing opportunity, a community must work to remove or mitigate impediments to fair housing choice. Furthermore, eligibility for federal funding assistance requires the City to comply with federal fair housing laws. Specifically, to receive HUD Community Planning and Development (CPD) formula grants, a jurisdiction must:

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

The City of Corona affirmatively furthers fair housing choice through the preparation of this A.I. and annual funding of a fair housing service provider. The City is dedicated to providing fair housing opportunities to all residents and ensuring compliance with all applicable laws.

Methodology and Citizen Participation

The scope of this A.I. adheres to the recommended content and format included in Volumes 1 and 2 of the "Fair Housing Planning Guide" published by the U.S. Department of Housing and Urban Development's Office of Fair Housing and Equal Opportunity.

Methodology

HUD requires jurisdictions that receive federal funding for community development activities to assess the status of fair housing in their community. As a recipient of Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funds, Corona is required to update the A.I. every five years and to report the findings and progress in the Consolidated and Performance Evaluation Report (CAPER) submitted to HUD following each program year. The City's last A.I. was adopted in April 15, 2015.

The purpose of this report is to identify impediments to fair and equal housing opportunities in Corona. This A.I. provides an overview of the laws, regulations, conditions or other possible obstacles that may affect access to housing and other services in Corona. The scope, analysis and format used in this A.I. report adhere to recommendations of the Fair Housing Planning Guide published by HUD. The A.I. contains six (6) chapters:

- 1. Executive Summary. This chapter provides background on fair housing, methodology, citizen participation, and a summary of the findings and recommendations identified within the report.
- 2. Community Characteristics. This chapter provides a brief history of the City, a demographic profile, income profile, employment profile, housing profile, special needs housing profile, and key maps to provide the baseline information necessary to form a complete understanding of the City. This chapter provides a broad overview and understanding of the community so that housing needs are clearly defined. Community profile information analyzed in this chapter includes data elements required by HUD in the online Consolidated Plan system (the eCon Planning Suite) from the 1990, 2000, and 2010 Decennial Census, 2011-2015 American Community Survey (ACS) 5-Year Estimates and the Affirmatively Furthering Fair Housing Tool (AFFH-T) data Version 4.
- 3. Analysis of Private Sector Impediments. This chapter provides an overview of the private owner-occupied housing market and the renter-occupied housing market. It examines the private-sector impediments to fair housing.
- 4. *Analysis of Public Policy Impediments.* This chapter identifies and analyzes a range of public activities that may impede fair housing choice, including governmental land use, development regulations, and community development activities. Potential impediments to fair housing choice are discussed.

- 5. Analysis of Current Fair Housing Activity. This chapter includes the current fair housing education, enforcement and legal status of any pending cases currently underway in the City.
- 6. Conclusions and Recommendations. This chapter provides a summary of major issues and recommendations to further fair housing. This chapter also reports on progress made in implementing the prior A.I. This chapter outlines the City's Fair Housing Plan for 2020-2024 including specific actions to be taken to address identified impediments within specific timeframes.

Citizen Participation

The City values citizen input on how well city government serves its residents. The public participation effort for the 2020-2024 A.I. adheres to the City's Citizen Participation Plan that was adopted October 2, 2019.

To solicit public participation in the Analysis of Impediments to Fair Housing study, the City held two Community Meetings on October 17, 2019 at St. Edwards Catholic Church and on October 23, 2019 at Corona City Hall. In addition, public and private agencies directly or indirectly involved with fair housing issues as well as interested individuals were invited to attend and participate in the Community Meetings. The purpose of the meeting was to provide a background on the scope of the study and solicit input on the most pressing issues affecting housing opportunities in Corona. The City also distributed surveys to all persons in attendance at the community meetings to gather information on what they perceive are the most pressing needs of their community. The survey was also available to the entire community electronically on the City website and in paper format at public facilities and affordable housing complexes. A total of 382 surveys were completed over 42 days from October 2, 2019 to November 12, 2019, with 322 surveys completed in English and 60 surveys completed in Spanish.

Following this meeting, a draft copy of the Analysis of Impediments to Fair Housing Choice was prepared. A notice of availability for review and comment was published in the newspaper and posted at City Hall (City Clerk's Office and Community Development Department), the Corona Public Library and on the City website.

The Draft AI was completed and made available for a 30-day public review period. The draft document was available at the City Clerk's office, the City's Community Development Department, the Corona Public Library and on the City website.

Status of Prior Impediments and Recommendations

HUD requires the City to analyze past performance with respect to the resolution of impediments to fair housing choice that were identified in prior A.I.s. The following impediments were included in the 2015-2019 A.I.:

2015-2019 Impediment No. 1: Lack of Access to Home Improvement Financing. The inability to fund home rehabilitation was identified in the A.I. as an impediment to lower and moderate-income households and Hispanic households. The CDBG target areas are in the northern and central portions of the City, where much of the City's older housing stock is located. These areas have a higher concentration of lower and moderate-income persons and minorities than the rest of the City. Based on Home Mortgage Disclosure Act (HMDA) data, these groups are more likely to be denied private home improvement loans.

2020 Status: In Progress.

Background: As of 2020, over 80 percent of the housing stock is at least 20 years old. A general rule of thumb in the housing industry is that homes built more than 30 years ago begin to require major investments to maintain quality. Moreover, 26 percent of the housing stock is over 40 years old.

To address this need, in 2012, the City of Corona revamped its own Residential Rehabilitation Program through CDBG and HOME Investment Partnerships funds. The Residential Rehabilitation Program is available to households earning less than 80 percent of area median income. This program provides forgivable loans of up to \$25,000 per owner-occupied dwelling unit to address critical home improvement needs such as the remediation of code violations, heating and air conditioning, exterior or interior paint, water heater replacement, roofing, plumbing, electrical, kitchen and bathroom facilities, termite eradication/repair and accessibility improvements.

According to the FY 2018-19 Consolidated Annual Performance and Evaluation Report (CAPER), the City has completed 63 rehabilitation projects since July 2015. As a result of these efforts, 63 households now benefit from living in housing units that are not only compliant with local codes and property standards, but that are also affordable to the household.

Recommendation: It is recommended that the City to continue to offer the Residential Rehabilitation Program to increase opportunities for low and moderate-income households to improve their homes. The City should also continue to implement a robust community outreach effort to ensure that available HOME and CDBG resources are deployed quickly to maintain decent housing. As noted in the 2013-21 Housing Element, the City's objective is to assist 120 households during the planning period, with an average of 15 households annually. From 2013 to 2015, 21 rehabilitation projects were completed. An additional 36 projects are needed during 2019-2020 and 2020-2021 to meet the Housing Element goal.

2015-2019 Impediment No. 2: Limited Access to Home Purchase Loans. African American and Hispanic households have limited access to conventional home purchase loans due to disproportionate denial rates compared to households of other racial groups. According to the 2020 A.I., of home purchase loan applicants earning less than 80 percent of Area Median Income (AMI), Hispanic households (66.67 percent) and African American households (50 percent) had disproportionately lower approval rates relative to the

overall approval rate of 89.84 percent. This was also the case in previous evaluations of Home Mortgage Disclosure Act data evaluated in the 2010 and 2015 A.I. documents.

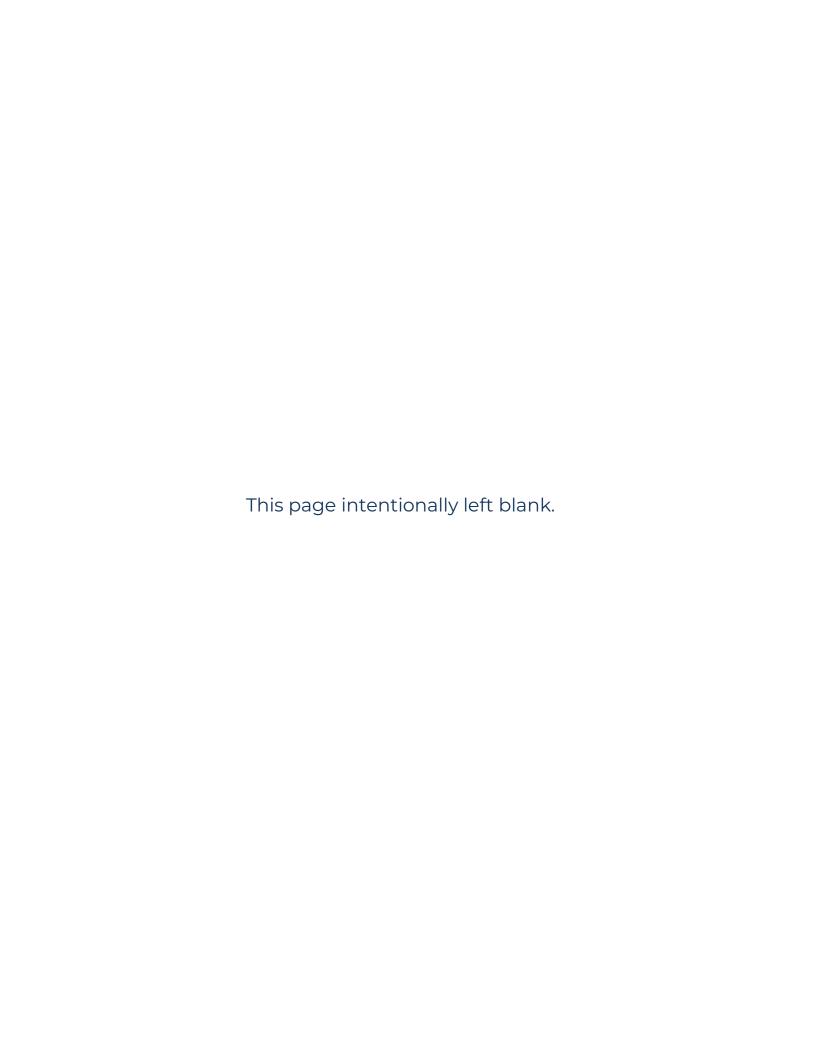
2020 Status: Unresolved.

Background: Differences in approval rates for home loan applications among minority groups do not necessarily reflect discriminatory practices. Differences could be due to credit scores, employment history, knowledge of the lending process, debt-income ratio, or other factors. Nonetheless, the disproportionately lower home purchase loan approval rates for Hispanics and African Americans could be subject to additional inquiry and examination, and affirmative efforts appear necessary to address this disparity.

Recommendation: It is recommended that the City work with its fair housing service provider to continue to monitor HMDA data to ensure that discrimination practices such as loan denial on the basis of race and ethnicity may be detected. In addition, it is recommended that the fair housing service provider continue to provide homeownership workshops to low- and moderate-income people, including minorities and members of protected classes, during the five-year period of the 2020 planning period.

New Impediments to Fair Housing Choice and Recommendations

No new impediments to fair housing choice were identified for the 2020 A.I.. The City actively works with developers, non-profit organizations, and the community to improve policies and enhance community and housing programs.



Community Characteristics

Overview

This Analysis of Impediments presents a demographic profile of the City of Corona. It evaluates the level of housing needs of specific groups and assesses the availability of a range of housing choices for its residents. The report also contains an analysis of the public and private sectors that examines factors limiting the availability of a range of housing choices, as well as conditions that may hinder a person's fair access to housing. Employment, transportation, and the provision of municipal services all play vital roles in terms of housing choice. In its conclusion, the report provides a practical guide with recommendations as to how to improve fair housing opportunities.

Demographic Profile

According to the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data Documentation, "The Affirmatively Furthering Fair Housing (AFFH) rule created a standardized process for fair housing planning that program participants use to help meet their longstanding requirement to affirmatively further fair housing. As part of this process, program participants analyze data and other information to assess fair housing issues in their jurisdictions and regions." Data provided by HUD for this demographic profile includes Decennial Census data from 1990, 2000, 2010, data from the Brown Longitudinal Tract Database (LTDB) based on decennial census data, as well as American Community Survey (ACS) 5-year estimates. These data were evaluated, along with local data and local knowledge, to conduct this A.I.

Population Trends

Tables II-1, II-2, II-3, II-4 and II-5 below present demographic information and demographic trends both for the jurisdiction and the region. In terms of population growth in the period between 1990 and the present, the City of Corona outpaced the region's astounding growth rate of 63.2 percent. While the number of residents within the region exploded from nearly 2.6 million to over 4.2 million, the jurisdiction's population swelled 87 percent within the same period, from 81,657 residents in 1990 to 152,374 currently. By the latest ACS estimates (2013-2017), the City's population has grown fully 100 percent to 163,585.

Age and Sex Characteristics

The City's largest demographic group, residents between the ages 18 and 64 years, grew 84 percent since 1990, keeping pace with the overall population growth rate of 87 percent within the jurisdiction over the period. The population of children under age 18 grew within a similar range, 81 percent, during the period. Factoring in the latest ACS estimates (2013-2017), these trends are more demonstrable. According to these latest numbers, the largest demographic group, ages 18 to 64, grew an even more robust 105 percent, and children under 18 grew only 65 percent. While the largest demographic group saw

substantial growth, there was a relative explosion in the numbers of the jurisdiction's seniors age 65 and above, whose population increased by 144 percent. As a percentage of the overall population, seniors grew from 5.74 percent to 7.51 percent. By current ACS estimates, the senior population increased by fully 237 percent to bring its share of the total population to as much as 9.7 percent of Corona residents, nearly in line with the region's 10.41 percent. This increase also stands in contrast to the trending decrease within the region of the senior population proportionally from 10.73 percent in 1990 to 10.41 percent currently.

In terms of sex, females began to outnumber males within the jurisdiction as of the 2000 census. That trend has continued to the present time, as women currently edge out men 50.75 percent to 49.25 percent, up from a deficit of 49.7 percent to 50.3 percent in 1990. This is in keeping with a regional trend that has seen a rise in the female population from 50 percent in 1990 to 50.27 percent in 2010.

Household Profile

Information on household characteristics assists cities and housing providers in understanding and meeting changing housing needs. The Bureau of the Census defines a household as all persons who occupy a housing unit, which may include single persons living alone, families related through marriage or blood, and unrelated individuals living together. Persons living in retirement or convalescent homes, dormitories, or other group living situations are not considered households for the purposes of the data.

Table II-1 below compares various household trends in Corona. Reflective of the age distribution within the City, families of all types continue to make up the vast share of the City's population, though that share has diminished from a high of 82.1 percent in 2010 to current estimates of 74.7 percent. Perhaps the most significant change since 2000 was the percent increase in the number of "Non-family" households (69.78 percent change). Families consisting of couples who are Married Without Children have increased by 20.36 percent since 2000. Likewise, Other Family households, consisting of a parent of either sex maintaining a household with no spouse present, have increased by 28.34 percent. Notably, the growth of these single parent households is greater than that of traditional married families with children, at 21.89 percent. Interestingly, 2017 ACS data identify a sizeable majority, 64.26 percent, or 5,142 of these 8,002 "Other Families," as "Female householder, no husband present, family household." Therefore, single mother households are an emerging demographic within the jurisdiction.

Table II-1 Households by Household Type

Household Type	2000		20	10	20	Percent Change				
	Number	Percent	Number	Percent	Number	Percent	Change			
Family Households	Family Households									
- Married With Children	15,017	39.7%	20,709	47.8%	18,304	36.6%	21.89%			
- Married Without Children	9,139	24.2%	6,716	15.5%	11,000	22.0%	20.36%			
- Other Families	6,235	16.5%	8,145	18.8%	8,002	16.0%	28.34%			
Non-Family Househ	olds									
- Non-families¹	7,448	19.7%	7,755	17.9%	12,645	25.3%	69.78%			
Total	37,839	100%	43,325	100%	49,953	100%	32.01%			
Average Household Size	3.29		3.38		3.2	-0.91%				

Source: U.S. Census 2000 & 2010 (DP-1), (QT-P11), 2013-2017 ACS Five-year Estimates, (S2501), (S1101).

Currently, among the region's families, the percentage of families with children is 50.99 percent (**Table II-3**). **Table II-5** shows that since 1990, households with children have consistently made up half or more of the region's family households overall. **Table II-4** demonstrates the jurisdiction's trend toward a decreasing proportion of families with children, from a high of 61.34 percent of all family households in 2000, to 55.62 percent currently.

¹ Total of Non-families includes Single Persons.

Table II-2 Demographics of City of Corona (Jurisdiction)

Race/Ethnicity		#	%
White, Non-Hispanic		58,095	38.13%
Black, Non-Hispanic		8,292	5.44%
Hispanic		66,538	43.67%
Asian or Pacific Islander, Non-Hispanic		15,077	9.89%
Native American, Non-Hispanic		432	0.289
Two or More Races, Non-Hispanic		3,667	2.41%
Other, Non-Hispanic		272	0.18%
National Origin			
#1 country of origin	Mexico	18,832	13.08%
#2 country of origin	Philippines	3,544	2.46%
#3 country of origin	India	1,558	1.08%
#4 country of origin	Vietnam	1,333	0.93%
#5 country of origin	Korea	1,177	0.82%
Limited English Proficiency (LEP) Language			
#1 LEP Language	Spanish	13,797	9.58%
#2 LEP Language	Korean	877	0.61%
#3 LEP Language	Tagalog	860	0.60%
#4 LEP Language	Vietnamese	858	0.60%
#5 LEP Language	Arabic	657	0.469
Disability Type			
Hearing difficulty	1	2,986	2.08%
Vision difficulty		2,398	1.67%
Cognitive difficulty		4,230	2.95%
Ambulatory difficulty		5,964	4.15%
Self-care difficulty		2,758	1.92%
Independent living difficulty		4,501	3.13%
Sex			
Male		75,050	49.25%
Female		77,324	50.75%
Age			
Under 18		45,572	29.91%
18-64		95,365	62.59%
65+		11,437	7.519
Family Type			
Families with children		20,185	55.629

Table II-3
Demographics of Riverside-San Bernardino-Ontario, CA (Region)

Race/Ethnicity		#	%
White, Non-Hispanic		1,546,666	36.61%
Black, Non-Hispanic		301,523	7.14%
Hispanic		1,996,402	47.25%
Asian or Pacific Islander, Non-Hispanic		261,593	6.19%
Native American, Non-Hispanic		19,454	0.46%
Two or More Races, Non-Hispanic		91,476	2.17%
Other, Non-Hispanic		7,737	0.18%
National Origin			
#1 country of origin	Mexico	553,493	13.95%
#2 country of origin	Philippines	62,019	1.56%
#3 country of origin	El Salvador	30,455	0.77%
#4 country of origin	Guatemala	19,549	0.49%
#5 country of origin	Vietnam	19,525	0.49%
Limited English Proficiency (LEP) Language			
#1 LEP Language	Spanish	533,544	13.45%
#2 LEP Language	Chinese	20,495	0.52%
#3 LEP Language	Tagalog	16,986	0.43%
#4 LEP Language	Vietnamese	12,570	0.32%
#5 LEP Language	Korean	11,883	0.30%
Disability Type			
Hearing difficulty		125,033	3.20%
Vision difficulty		86,934	2.23%
Cognitive difficulty		170,114	4.36%
Ambulatory difficulty		241,262	6.18%
Self-care difficulty		102,841	2.63%
Independent living difficulty		170,490	4.37%
Sex			
Male		2,101,083	49.73%
Female		2,123,768	50.27%
Age			
Under 18		1,214,696	28.75%
18-64		2,570,221	60.84%
65+		439,934	10.41%
Family Type			
Families with children		500,062	50.99%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S.

Department of Housing and Urban Development, March 2019.

Note 1: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census; ACS

Note 4: Refer to the Data Documentation for details

(http://www.hudexchange.info/resource/4848/affh-data-documentation).

Table II-4
Demographic Trends of Corona (Jurisdiction)

	1990	Trend	2000 7	Trend	2010 Trend		Current		
Race/Ethnicity	#	%	#	%	#	%	#	%	
White, Non-Hispanic	49,860	61.10%	61,014	47.72%	58,095	38.13%	58,095	38.13%	
Black, Non-Hispanic	1,929	2.36%	8,477	6.63%	9,358	6.14%	8,292	5.44%	
Hispanic	24,161	29.61%	44,981	35.18%	66,538	43.67%	66,538	43.67%	
Asian or Pacific Islander, Non- Hispanic	5,076	6.22%	11,210	8.77%	17,168	11.27%	15,077	9.89%	
Native American, Non- Hispanic	384	0.47%	1,007	0.79%	814	0.53%	432	0.28%	
National Origin									
Foreign-born	14,554	17.82%	27,158	21.24%	38,316	25.15%	38,790	25.46%	
LEP									
Limited English Proficiency	10,196	12.49%	18,473	14.45%	22,820	14.98%	20,131	13.21%	
Sex									
Male	41,076	50.30%	63,109	49.36%	75,050	49.25%	75,050	49.25%	
Female	40,581	49.70%	64,743	50.64%	77,324	50.75%	77,324	50.75%	
Age									
Under 18	25,240	30.91%	43,464	34.00%	45,572	29.91%	45,572	29.91%	
18-64	51,733	63.35%	76,845	60.10%	95,365	62.59%	95,365	62.59%	
65+	4,684	5.74%	7,543	5.90%	11,437	7.51%	11,437	7.51%	
Family Type	Family Type								
Families with children	11,995	58.18%	15,708	61.34%	20,185	55.62%	20,185	55.62%	

Table II-5
Demographic Trends of Riverside-San Bernardino-Ontario, CA (Region)

	1990 Trend		2000 T	2000 Trend		2010 Trend		
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	1,615,830	62.41%	1,540,776	47.33%	1,546,666	36.61%	1,546,666	36.61%
Black, Non-Hispanic	168,731	6.52%	263,322	8.09%	336,944	7.98%	301,523	7.14%
Hispanic	685,672	26.48%	1,228,683	37.75%	1,996,402	47.25%	1,996,402	47.25%
Asian or Pacific Islander, Non- Hispanic	93,331	3.60%	164,035	5.04%	298,585	7.07%	261,593	6.19%
Native American, Non-Hispanic	18,007	0.70%	36,061	1.11%	36,077	0.85%	19,454	0.46%
National Origin								
Foreign-born	360,666	13.93%	612,354	18.81%	904,558	21.41%	920,860	21.80%
LEP								
Limited English Proficiency	252,012	9.73%	462,538	14.21%	660,791	15.64%	640,802	15.17%
Sex								
Male	1,294,274	50.00%	1,618,466	49.73%	2,101,083	49.73%	2,101,083	49.73%
Female	1,294,518	50.00%	1,636,316	50.27%	2,123,768	50.27%	2,123,768	50.27%
Age								
Under 18	771,845	29.81%	1,044,686	32.10%	1,214,696	28.75%	1,214,696	28.75%
18-64	1,539,215	59.46%	1,869,817	57.45%	2,570,221	60.84%	2,570,221	60.84%
65+	277,732	10.73%	340,280	10.45%	439,934	10.41%	439,934	10.41%
Family Type								
Families with children	350,701	53.60%	266,840	54.97%	500,062	50.99%	500,062	50.99%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S.

Department of Housing and Urban Development, March 2019.

Note 1: All % represent a share of the total population within the jurisdiction or region for that year, except for family type, which is out of total families.

Note 2: Data Sources: Decennial Census, ACS.

Note 3: Refer to the Data Documentation for details

(http://www.hudexchangeinfo/resource/4848/affh-data-documentation).

Race and Ethnicity

Among other protected characteristics and classes of individuals, the Fair Housing Act prohibits housing discrimination based on race. While HUD provides data on both race and ethnicity, Hispanics of any race are considered for its purposes as a separate race/ethnic category that "can experience housing discrimination differently than other groups." Therefore, people who identify their ethnicity as Hispanic are excluded from the data

provided for the other race groups – Black, Asian and Pacific Islander, Native American, and Other.

Several generalizations can be made, based upon evaluation of the demographics and demographic trends presented in the tables above. First, the jurisdiction is more White than the region at large. Corona's population is 38.13 percent White, as compared the region's 36.61 percent of residents who identify as White. Second, the jurisdiction is somewhat less Hispanic than the region at large (43.67 percent vs. 47.25 percent). Third, the jurisdiction is more heavily Asian/ Pacific Islander than the region at large (9.89 percent vs. 6.19 percent). The jurisdiction is also slightly less Black than the region (5.44 percent vs. 7.14 percent).

Hispanics outnumber Whites within the greater region, making up 47.25 percent of the region's population compared to 36.61 percent for Whites. Within the jurisdiction, the populations are closer to achieving parity, at 43.67 percent for Hispanics compared to 38.13 percent for Whites. In terms of growth, the White population within the jurisdiction has generally followed the negative growth trend of the region, in terms of percentages if not absolute numbers. While Corona's White population ticked up sharply between 1990 and 2010, the group's overall percentage nevertheless continued to decline, as its numbers ticked back downward. Non-White populations, meanwhile, have grown consistently since 1990, including a greater than 175 percent population increase among Hispanics within the city of Corona, and a near trebling in size of the same group within the region as a whole.

The Native American population in both the jurisdiction and the region experienced a surge between 1990 and 2000, more than doubling in size, only to see its current numbers in both statistical groups reduced to near-1990 levels.

Foreign Born Population and Limited English Proficiency

In terms of national origin, the largest foreign-born population within the jurisdiction and the region is from Mexico, with Mexican natives comprising 13.08 percent of Corona residents and 13.95 percent the region's residents. Whereas three of the region's five largest groups of foreign-born nationals are from Latin America, four of the five most populous groups of foreign nationals in the jurisdiction hail from Asian countries, namely the Philippines, India, Viet Nam, and Korea. The remaining five most populous non-native groups have origins in Pakistan, El Salvador, Iran, Egypt and Canada, but each of these groups represents only 0.59 percent or fewer of the City's residents.

These foreign-born nationals include residents who have less than a fluent mastery of the English language, and therefore need accommodation. Corona residents with Limited English Proficiency (LEP) are among the fastest growing population subgroup, having increased their numbers 97.44 percent from 10,196 in 1990 to 20,131 currently. As a percent of the population, their numbers have increased from 12.49 percent to 13.21 percent. This is still somewhat less than the regional percentage of 15.17 percent.

Racial Integration

As stated in the AFFH-T Data Documentation, HUD has developed a series of indices to help inform communities about segregation and disparities in access to opportunity in their jurisdiction and region. These indices are as follows:

- 1. Dissimilarity Index;
- 2. Low Poverty Index;
- 3. School Proficiency Index;
- 4. Jobs Proximity Index;
- 5. Labor Market Engagement Index;
- 6. Low Transportation Cost Index;
- 7. Transit Trips Index; and
- 8. Environmental Health Index.

Analysis of these indices shows that with the exception of their ability to access high job proximity and a healthy environment (**Table II-12**, Section D below), residents of the city of Corona enjoy a relatively high quality of life, compared to residents of the region generally. Higher index scores nearly across the board indicate greater access for Corona residents to opportunity in the important areas of education, employment, and transportation, and lower exposure to poverty. Further, these scores are consistent across various protected groups, meaning that members of most racial and ethnic groups enjoy a better standard of living by various measures than their counterparts within the greater statistical region. Furthermore, the trend toward segregation of these groups seen within the region at large is much less apparent within the jurisdiction, as indicated by the first major index by which HUD measures disparities in access to opportunity.

Dissimilarity Index

According to HUD, "The dissimilarity index (or the index of dissimilarity) is a commonly used measure of community-level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. The values of the dissimilarity index range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question, and a value of 100 representing perfect segregation between the racial groups." (AFFH - T)

As is the case with five of the remaining seven indices presented in **Table II-12** (Section D, below), the City of Corona's Racial/Ethnic Dissimilarity Index shown below in **Table II-6** compares favorably to the region in terms of absolute values, meaning that Corona is more integrated than the region overall in each of the four comparisons shown in **Table II-6**.

While individual ethnic groups have seen their segregation levels rise slightly since 1990, an examination of overall trends reveals a slight tendency toward improved integration of Non-Whites within the City generally, with the Non-White/White dissimilarity Index decreasing from 26.82 in 1990 to 26.79 currently. This picture stands sharply in contrast to the region, which has seen its Non-White/White Dissimilarity Index increase by 25.4

percent during the same period. Every ethnic/racial group within the City fares better than its regional counterparts. Though Blacks within the City have seen their dissimilarity index increase by a factor of 26.29 percent, as compared an increase of only 8.96 percent for their regional counterparts, the current Index value of 26.47 indicates a much greater level of integration than that indicated by an index score of 47.66 for their regional counterparts. Hispanics in the City have seen a decrease in the dissimilarity index by a factor of 4.50 percent compared to an increase of 23.59 percent within the region. Asians and Pacific Islanders have experienced the greatest increase in segregation levels as measured by the Index, at 29.33 percent, compared to 29.85 percent within the region. However, as with all other ethnic groups within the City, their level of integration with respect to Whites is far superior to that of their regional counterparts, at an Index value of 23.09 versus 43.07.

Table II-6 Racial/Ethnic Dissimilarity Trends

		ona, CA CI irisdictio	-			ide-San B , CA) Reg	ernardin ion	10-
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	26.82	25.75	25.07	26.79	32.92	38.90	38.95	41.29
Black/White	20.96	23.79	22.25	26.47	43.74	45.48	43.96	47.66
Hispanic/White	35.09	36.93	32.12	33.51	35.57	42.40	42.36	43.96
Asian or Pacific Islander/ White	18.48	24.70	19.23	23.09	33.17	37.31	38.31	43.07

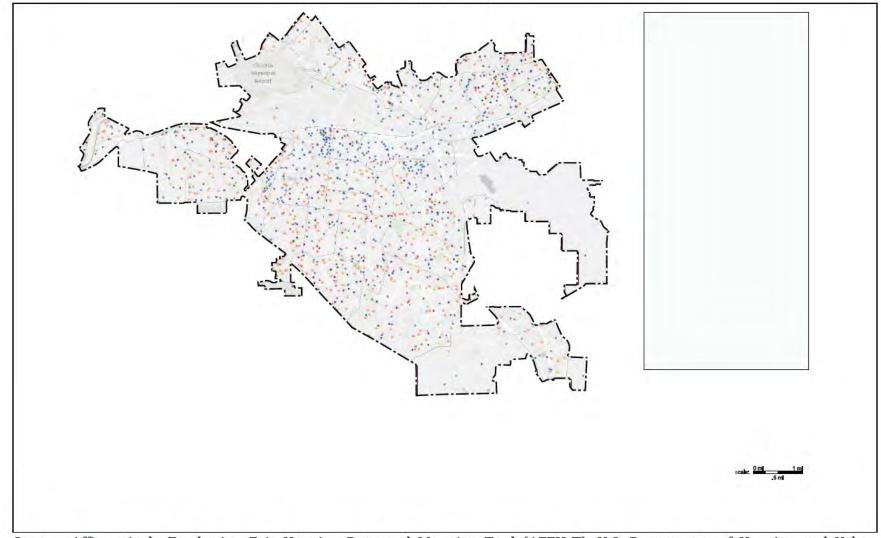
Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, March 2019.

Note 1: Data Sources: Decennial Census

Note 2: Refer to the Data Documentation for details

(http://www.hudexchange.info/resource/4848/affh-data-documentation).

The relative degree of segregation within the City as respects these communities is shown in **Map II-1** below, wherein concentrations of colored dots represent various races/ethnic groups, with orange dots representing Whites. Each dot represents 50 people.



Map II-1 Race / Ethnicity

Income Profile

In evaluating household income, households are grouped in relation to the County Median Family Income (MFI) and adjusted for household size. This grouping provides a useful basis of comparison between Corona and the region and also corresponds with terminology used in the City's low-income housing programs. To facilitate discussion of 2013-2017 5-Year ACS data, the 2018 HUD MFI limits are shown below in **Table II-7**. The categories include:

- Extremely Low Income (0-30 percent of County MFI);
- Low Income (31-50 percent of County MFI);
- Moderate Income (51-80 percent of County MFI);
- Middle/Upper Income (>81 percent of County MFI);
- Upper Income (>120 percent of County MFI).

Table II-7 HUD Median Family Income Limits

Household Size / MFI %	1	2	3	4
0-30%	\$14,150	\$16,460	\$20,780	\$25,100
31-50%	50% \$23,600		\$30,350	\$33,700
51-80%	\$37,750	\$43,150	\$48,550	\$53,900
81-100%	\$46,100	\$52,650	\$59,250	\$65,800
101-120%	\$55,300	\$63,200	\$71,100	\$79,000

Source: U.S. Department of Housing and Urban Development, 2018.

Note 1: FY 2018 Income Limits presented for Riverside-San Bernardino-Ontario

Metropolitan Area only.

Income of Households

The data in **Table II-8** on the following page indicates that the average household income in Corona is \$91,095 per year, with the median income of \$73,594. Nearly two-thirds, or 65.8 percent, of all Corona households earn more than \$50,000 per year, and nearly 36 percent of households are considered upper income households that earn more than \$100,000 per year.

Family households (defined by the Census Bureau for data purposes to mean two or more individuals who are related by birth, marriage, or adoption, although they also may include other unrelated people) generally earned better incomes than nonfamily households. Married-couple family households earned the highest incomes among household types with 78.1 percent earning more than \$50,000 per year and 46.9 percent earning more than \$100,000 per year. Nonfamily households (defined by the Census Bureau for data purposes to mean people who live alone or who share their residence with unrelated individuals)

earned a median income of \$44,297, with only 45.8 percent earning more than \$50,000 per year and only 17.9 percent earning more than \$100,000 per year.

Table II-8 Number of Households by Income Level

	-									
	All Households		Famili	Families only		Married-couple families only		Nonfamily households only		
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error		
Total	49,953	+/-775	37,308	+/-557	29,306	+/-624	12,645	+/-788		
Less than \$10,000	4.50%	+/-0.6	2.30%	+/-0.5	1.20%	+/-0.5	11.50%	+/-2.1		
\$10,000 to \$14,999	3.60%	+/-0.5	2.20%	+/-0.5	1.70%	+/-0.5	8.00%	+/-1.3		
\$15,000 to \$24,999	6.90%	+/-0.9	6.60%	+/-1.0	4.70%	+/-1.0	10.40%	+/-1.7		
\$25,000 to \$34,999	8.10%	+/-0.8	6.60%	+/-0.9	5.50%	+/-1.0	11.50%	+/-2.1		
\$35,000 to \$49,999	11.10%	+/-1.0	10.60%	+/-1.0	8.90%	+/-1.1	12.80%	+/-2.1		
\$50,000 to \$74,999	16.80%	+/-1.2	16.30%	+/-1.3	15.70%	+/-1.3	17.90%	+/-2.1		
\$75,000 to \$99,999	13.30%	+/-0.9	14.60%	+/-1.1	15.50%	+/-1.3	10.00%	+/-1.5		
\$100,000 to \$149,999	20.30%	+/-1.1	22.50%	+/-1.3	25.00%	+/-1.5	12.40%	+/-2.1		
\$150,000 to \$199,999	8.50%	+/-0.8	9.90%	+/-0.9	11.70%	+/-1.1	3.70%	+/-1.1		
\$200,000 or more	6.90%	+/-0.6	8.30%	+/-0.8	10.20%	+/-1.0	1.80%	+/-0.8		
Median income (dollars)	73,594	+/-1,785	83,399	+/-1,753	94,363	+/-2,519	44,297	+/-3,902		
Mean income (dollars)	91,095	+/-1,890	100,152	+/-2,426	111,056	+/-2,921	58,732	+/-3,461		

Source: U.S. Census Bureau, S1901, 2013-2017 American Community Survey 5-Year Estimates.

Cost Burden

A direct means by which HUD measures income in relation to housing vulnerability is the degree to which households experience cost burden, defined as the expenditure of more than 30 percent of total gross household income on housing costs, and severe cost burden, defined as the expenditure of more than 50 percent of total gross household income on housing costs. Housing costs for renters include rent paid by the tenant plus utilities; for owners, housing costs include mortgage payment, taxes, insurance, and utilities.

Table II-9
Demographics of Households with Severe Housing Cost Burden

	(Corona, (CA CDBG) Jur	isdiction	(Riverside-San Bernardino-Ontario, CA) Region			
Households by Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden	
White, Non-Hispanic	3,170	20,690	15.32%	109,075	615,660	17.72%	
Black, Non-Hispanic	570	2,665	21.39%	28,670	96,380	29.75%	
Hispanic	3,300	15,270	21.61%	112,350	469,370	23.94%	
Asian or Pacific Islander, Non-Hispanic	990	4,778	20.72%	16,065	75,739	21.21%	
Native American, Non- Hispanic	0	130	0.00%	1,145	5,864	19.53%	
Other, Non-Hispanic	270	854	31.62%	5,605	24,015	23.34%	
Total	8,300	44,400	18.69%	272,910	1,287,025	21.20%	
Households by Household Type and Size	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden	
Family households, <5 people	4,860	26,004	18.69%	140,335	715,300	19.62%	
Family households, 5+ people	1,470	9,790	15.02%	46,785	249,069	18.78%	
Non-family households	2,014	8,595	23.43%	85,810	322,655	26.59%	

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S.

Department of Housing and Urban Development, March 2019.

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # of households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems.

Note 4: Data Sources: CHAS

Note 5: Refer to the Data Documentation for details

(http://www.hudexchange.info/resource/4848/affh-data-documentation).

Table II-9 on the previous page compares the degree to which residents within the jurisdiction experience severe cost burden to the level at which the region's residents experience the same issue. Data are broken down by race/ethnic group and by household type/size.

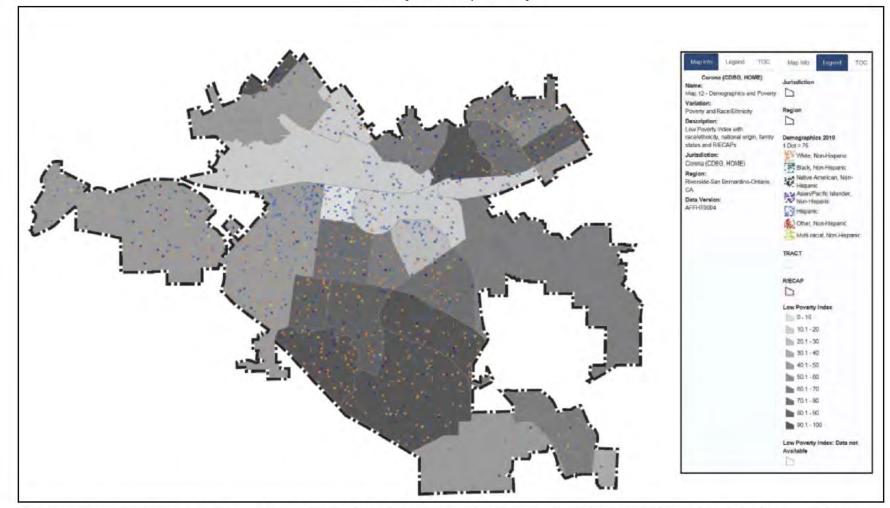
Among the City of Corona's 44,400 total households, 8,300, or 18.69 percent, are severely cost burdened. This indicates the issue is less prevalent among Corona residents than for the region's residents, among whom 21.20 percent experience severe cost burden. The data also show that Blacks, Hispanics and Asians as individual groups are all more susceptible to cost burden within the City of Corona than the population in general. All three groups, however, experience severe cost burden at lower rates than that of their regional counterparts. For the City's Hispanics, the rate is 21.61 percent vs. 23.94 percent for the region. For the City's Black residents, the difference is more pronounced, with only 21.39 percent of these City residents experiencing severe cost burden as compared to the region's 29.75 percent. Asian households within the City experience severe cost burden in 20.72 percent of cases, lower than the regional percentage of 21.21 percent, but still higher than the baseline rate of 18.69 percent for the jurisdiction.

Both large and small family households experience severe cost burden within the City at rates slightly under that of the region.

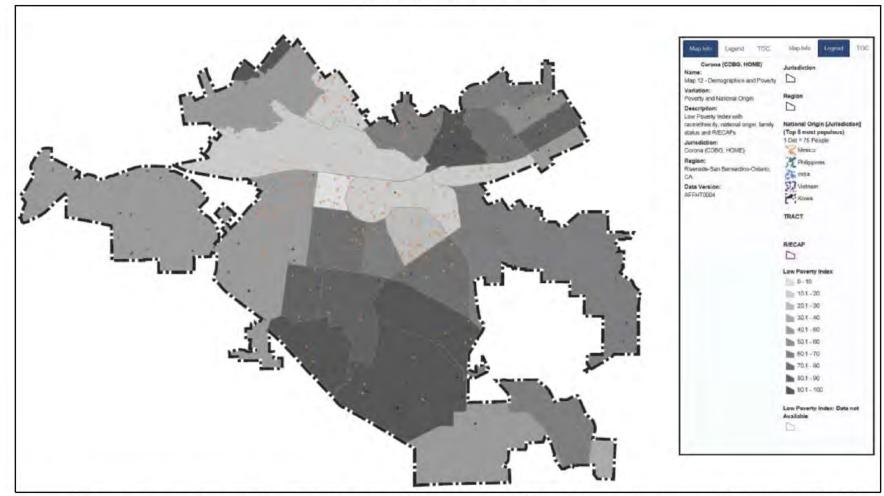
Geography and Income

Although HUD has not identified any specific Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), there is nonetheless a division within the City of Corona between geographic regions containing residents with higher exposure to poverty and those whose residents have lower exposure to poverty as measured by HUD's Low Poverty Index scores.

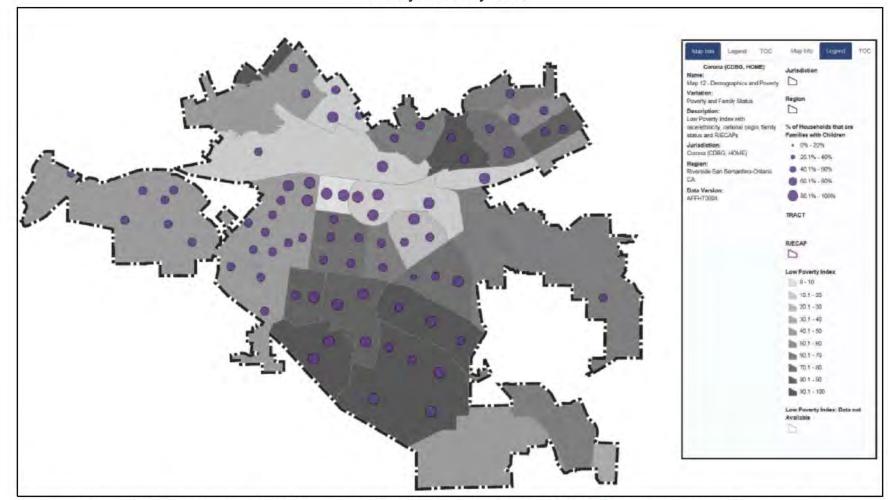
Maps II-2a, 2b, and 2c on the following pages illustrate areas within Corona that have various levels of exposure to poverty, as measured by the Low Poverty Index. The darkest shaded areas have the lowest poverty exposure, meaning that these areas contain the smallest numbers of residents whose income falls at or below federal poverty level guidelines. The lightest areas have the greatest poverty exposure, with attendantly highest occurrences of residents in poverty. These index scores are examined against a backdrop of race/ethnicity, national origin and family status. The maps show that the neighborhoods in Corona with the lowest poverty index scores, and thereby the highest exposure to poverty, lie along a lightly-shaded swath that encompasses the central part of the City, from the SR-91 corridor to the north and west, to the downtown area within the West Grand Boulevard circle, and extending toward Home Gardens to the east. An even higher concentration, with an Index score in the 0-10 percent range, lies directly west of downtown, along 6th Street and bordered by South Lincoln Boulevard. Map II-2b shows a high concentration of Mexican-born residents in the regions with the lowest Index scores, indicated by a preponderance of orange dots. Map II-2c shows a fair distribution of families with children within the highest poverty areas, as indicated by large purple dots, representing regions with concentrations of 80.1 to 100 percent of families with children.



Map II-2a Poverty and Race/Ethnicity



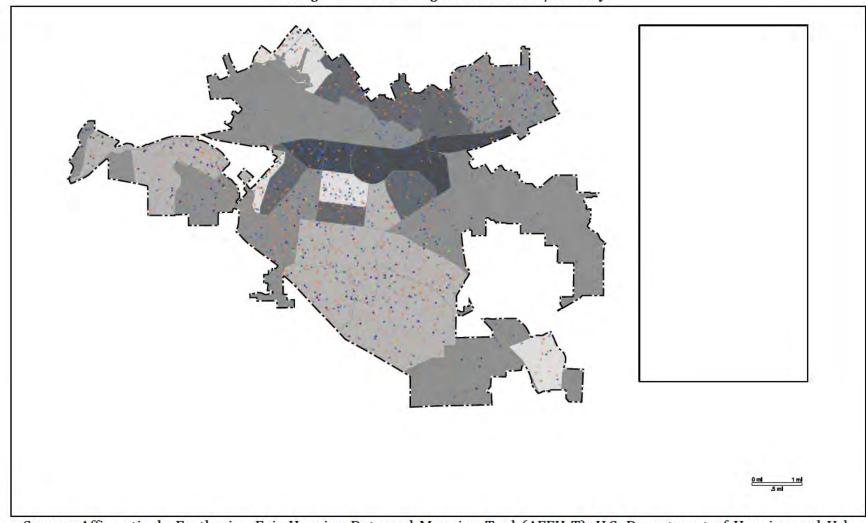
Map II-2b
Poverty and National Origin



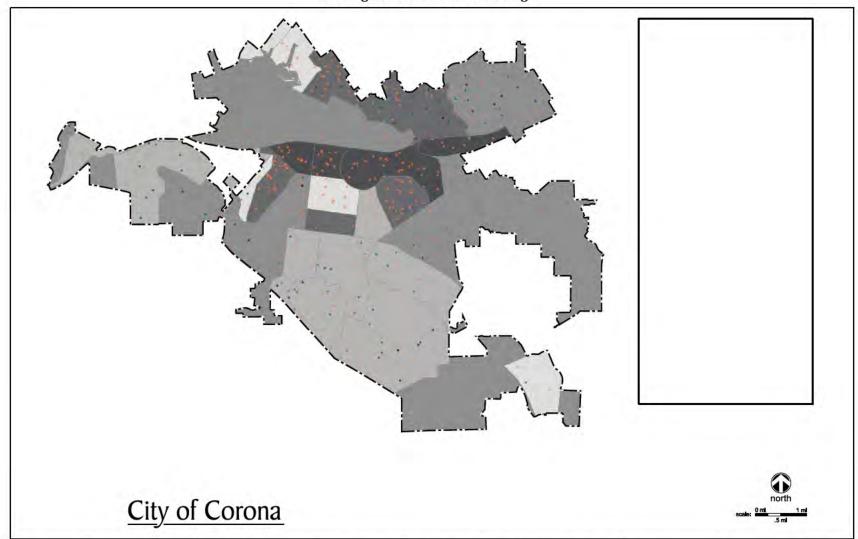
Map II-2c Poverty and Family Status

Geography and Cost Burden

Maps II-3a and **3b** on the following page show the geographic distribution of households with housing burden within the city of Corona. The geographic areas in which 63.29 percent or more of households experience cost burden, indicated by the darkest grey shading, overlap those areas described above as having relatively high poverty exposure. These include the central part of the City, from the SR-91 corridor to the north and west, to the downtown area within the West Grand Boulevard circle, and extending toward Home Gardens to the east. These areas are heavily Hispanic, indicated by the prevalence of blue dots, and, as Map 3b shows, are also home to large numbers of Mexican nationals, indicated by the preponderance of orange dots. Other areas appearing to have concentrations of housing burden of greater than 53.33 percent are located around the northern boundaries of the City, along River Road, and crossing the I-15 north of downtown. These areas also appear to be home to large numbers of Mexican nationals.



Map II-3a Housing Problems: Housing Burden and Race/Ethnicity



Map II-3b Housing Burden and National Origin

Employment Profile

Local economic characteristics impact local housing needs, even though these characteristics may not be directly related to fair housing. These economic characteristics include the types of jobs available within the municipality, the way residents access jobs (e.g., auto, transit, etc.), the types of occupations held by residents, and their household income. This section explores economic trends and characteristics in Corona as a means of identifying and understanding local housing needs.

Major Employers

Corona's top 10 employers in recent years have included a combination of Medical, Education, and Municipal sectors, with a healthy component of manufacturing and retail. The City's top three employers, Corona-Norco Unified School District, Corona Regional Medical Center, and Kaiser Permanente have competed with one another for the City's top three positions since 2009. Noted guitar manufacturer, Fender USA, has been joined by two emerging manufacturer/retailers, one a manufacturer of energy drinks, Monster Energy, and the other a manufacturer of insulation products for the construction industry. A producer and distributor of conventional and organic produce, Veg Fresh Farms, rounds out the list. **Table II-10** lists the major employers in Corona.

Table II-10 Major Employers in Corona

, , , , , , , , , , , , , , , , , , , ,								
Name of Business or Institution	Number of Employees	% of Total City Employment	Type of Business					
Corona-Norco Unified School District	5,478	6.55%	Education					
Corona Regional Medical Center	1,200	1.44%	Medical					
Kaiser Permanente	995	1.19%	Medical					
All American Asphalt	840	1.00%	Construction					
City of Corona	785	0.94%	Municipal					
TWR Framing Enterprises	750	0.90%	Construction					
Fender USA Corona	675	0.81%	Mfg/Retail					
Monster Energy	607	0.73%	Mfg/Retail					
Thermal Structures	500	0.60%	Mfg/Retail					
Veg Fresh Farms	425	0.51%	Agriculture/Retail					
Total	12,255	14.67%						

Source: Corona Comprehensive Annual Financial Report, Year ended June 30, 2018

Jobs Held by Residents

According to 2013-2017 ACS estimates, the total civilian population over age 16 is 126,969 (B23025). Of these residents, 83,684, or 65.91 percent, are in the labor force. Among these labor force participants, 78,052 are employed and 5,562 are unemployed. The city of Corona reports 83,617 local jobs and an unemployment rate of 3.60 percent

(https://www.coronaca.gov/government/departments-divisions/economic-development/workforce).

Table II-11 on the following page shows the occupations of residents, the number of residents in each category, and the percentage employed in each occupation. Of particular note is the high proportion of management/business, science and arts occupations held by Corona residents, along with sales and office occupations.

Table II-11
Occupation Characteristics, Corona city, CA

	• •	
Occupations of Residents	Number of Residents	% Employed by Occupation
Total civilian employed population 16 and over	78,052	
Management, business, science, and arts	27,596	35.4%
Service	12,467	16.0%
Sales and office	21,173	27.1%
Natural resources, construction, and maintenance	6,839	8.8%
Production, transportation, and material moving	9,977	12.8%

Source: 2013-2017 American Community Survey, S2401.

Labor Market Engagement Index

According to HUD, "The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract" (Data Documentation, version AFFHT0004a, revised March 2018, p. 18). Educational attainment is a measure of those within a census tract who have achieved a bachelor's degree or higher. Values are ranked by national percentile and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood.

As shown in **Table II-12** on the following page, the group with the highest Labor Market Index scores in both the jurisdiction and the region is Asians and Pacific Islanders, at 54.03. This group is followed by Whites within the jurisdiction, at 51.76; Blacks in the jurisdiction at 49.08; and Blacks in poverty, at 46.36. Corona's Hispanics, at 38.55, fall behind two groups below the poverty level, Asians and Pacific Islanders and Whites, at 42.75 and 42.53 respectively, as well as Native Americans within the general population at 42.61. HUD attempts to correct for income disparities by statistically separating out the population below the federal poverty level. For Corona residents below the poverty line, the numbers decrease precipitously for most groups, but remain substantially higher than the general population numbers for the region. For Corona's Native American population in poverty, however, the index value plunges nearly 30 points to 13.0.

Compared to the region, all ethnic groups in Corona, including those in poverty, with the exception of Native Americans in poverty, enjoy greater labor market engagement and have access to greater human capital than their jurisdictional counterparts, as measured by their Labor Market Index scores. Hispanics' scores are 59 percent higher within the jurisdiction than in the region; Blacks' 81 percent higher; Whites' 50 percent higher; and Asians' 26 percent higher. When the population below the poverty line is compared to the region, the difference is even more pronounced. Hispanics below the poverty line within Corona have scores that are 65 percent higher than those of the same income level within the region. For Blacks, the difference is 167 percent. Whites and Asians fare better by factors of 66 percent and 40 percent respectively. For Native Americans in poverty, the differential between the jurisdiction and the region is negative 37 percent.

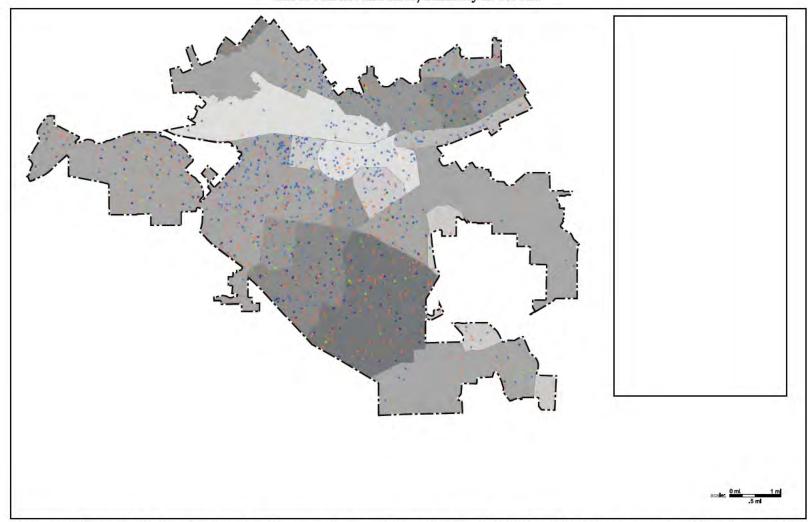
Table II-12 Opportunity Indicators by Race/Ethnicity

Index / Indicator	Low Poverty	School Proficiency	Labor Market	Transit	Low Transportation Cost	Jobs Proximity	Environ- mental Health
			City of Cor	ona			
Total Population							
White, Non-Hispanic	72.08	63.44	51.76	45.59	29.52	42.79	49.48
Black, Non-Hispanic	68.83	60.98	49.08	48.29	36.13	47.20	45.25
Hispanic	52.51	52.86	38.55	50.75	41.06	49.51	41.67
Asian or Pacific Islander, Non- Hispanic	74.61	64.80	54.03	45.93	30.21	47.34	48.70
Native American, Non-Hispanic	59.85	57.46	42.61	49.02	36.64	44.30	43.16
Population below fede	eral pover	ty line					
White, Non-Hispanic	52.94	50.83	42.53	54.85	47.87	41.14	39.85
Black, Non-Hispanic	69.62	63.99	46.36	50.67	37.41	51.88	43.92
Hispanic	30.63	41.48	27.05	55.59	51.84	54.88	35.70
Asian or Pacific Islander, Non- Hispanic	60.87	59.39	42.75	49.00	38.28	50.49	45.16
Native American, Non-Hispanic	10.00	30.86	13.00	65.00	69.00	75.81	27.00
	R	iverside-San	Bernardir	10-Ontari	io Region		
Total Population							
White, Non-Hispanic	52.61	50.65	34.50	37.96	25.75	49.50	55.48
Black, Non-Hispanic	42.80	41.50	27.18	42.55	31.82	49.72	44.22
Hispanic	37.51	37.99	24.20	43.12	32.68	47.81	42.38
Asian or Pacific Islander, Non- Hispanic	60.42	56.42	43.02	41.92	29.18	48.25	42.29
Native American, Non-Hispanic	41.19	40.74	25.06	36.84	26.34	50.16	56.24
Population below fede	eral pover	ty line					
White, Non-Hispanic	38.39	42.36	25.55	38.74	29.20	49.95	56.84
Black, Non-Hispanic	27.15	30.84	17.39	43.48	34.78	48.95	44.86
Hispanic	23.78	31.06	16.42	44.76	36.54	49.34	42.23
Asian or Pacific Islander, Non- Hispanic	42.30	43.14	30.51	45.00	37.05	51.32	39.74
Native American, Non-Hispanic	30.24	34.37	20.61	39.17	32.05	52.23	50.63

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA Note 2: Refer to the Data Documentation for details (http://www.hudexchange.info/resource/4848/affh-data-documentation).

Maps II-4a, 4b, and 4c below shows a familiar pattern within the city of Corona, in which the lightest shaded areas, indicating the lowest Labor Market Engagement Index scores, and therefore the lowest levels of employment, labor force participation and educational attainment, are all located in and around the downtown area and in a swath above SR-91 to the western city limits and dipping down below SR-91 along the I-15 corridor and eastward toward the Home Gardens neighborhood. These areas contain relatively large numbers of Hispanic residents, as indicated by blue dots, each representing 75 residents. The highest concentrations of Hispanic residents are in the neighborhoods due west of downtown, along S. Lincoln Blvd., and encompassing the areas to the southwest, all of which have slightly better labor market engagement than downtown itself.

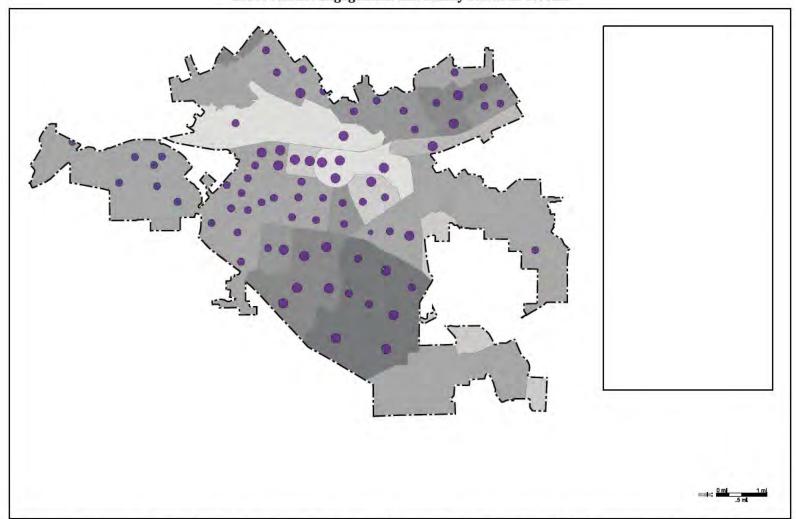
The HUD mapping tool allows us to examine national origin and family status as they relate to labor market scores, and these results are shown in **Maps II-4b** and **4c below**. As indicated by the preponderance of orange dots in Map 4b, Mexican nationals tend to reside in the lowest scoring labor market engagement region, namely downtown, as well as in the areas to the southwest and to the southeast of downtown, which have similarly low employment, labor force participation, and educational achievement. Another concentration of Mexican nationals is found directly northwest of downtown, along the River Road corridor, these areas having labor market scores similar to the southwestern regions of the City. The following map, 4c, shows areas where the concentration of households consisting of families with children ranges from 80.1 percent to 100 percent of the total. Many such areas, indicated by the larger purple dots, are in the lightest shaded regions, indicating low labor market engagement.



Map II-4a Labor Market and Race/Ethnicity in Corona



Map II-4b
Labor Market and National Origin in Corona



Map II-4c
Labor Market Engagement and Family Status in Corona

Jobs Proximity Index

HUD states, "The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily." "Values are percentile ranked at the CBSA level with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood."

Table II-12 on page 24 presents Jobs Proximity Index rankings for various groups, broken down by ethnicity and with separate statistics for residents below the poverty level. The scores for the jurisdiction are fairly consistent, even rising slightly for most groups of residents below the federal poverty line. In fact, the highest score in the jurisdiction is among Native Americans below the poverty line, at 75.81. The lowest score is assigned to Whites in poverty, at 41.14. The other three ethnic groups scored higher among their populations in poverty than among their general populations, including Hispanics below the poverty level, at 54.88, Blacks below the poverty level, at 51.88, and Asians or Pacific Islanders below the poverty level, at 50.49. One sub-poverty group, Native Americans, soared to 75.81, compared to 44.30 for its general population within the jurisdiction. These relatively high Jobs Proximity Index scores for populations in poverty indicate a co-location of job centers and high poverty neighborhoods.

Examination of **Map II-5** on the following page shows the distribution of geographic areas with high Jobs Proximity Index scores, indicated by the darker shaded areas, along with the distribution of various racial groups, indicated by colored dots, representing clusters of 50 people. When one bears in mind that the highest Index scores were reported for communities below the poverty line, a picture emerges of poorer neighborhoods having the best access to jobs. These include the areas traversing the City along the two major highways, the I-15 and SR-91, including the census-designated place, or CDP, known as El Cerrito, and areas east of the City, such as El Sobrante, Woodcrest, Mead Valley, and Lake Mathews.



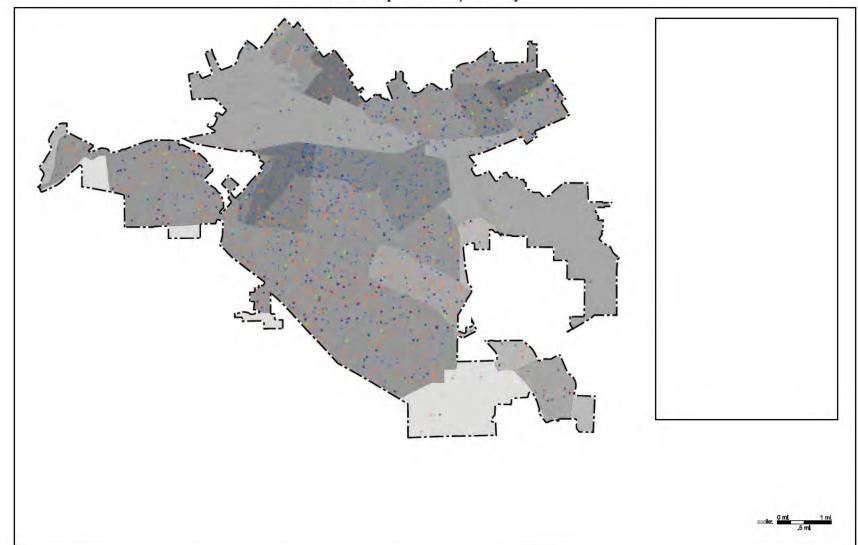
Map II-5
Demographics and Job Proximity in Corona

Transit Trips Index

Corona residents enjoy superior access to transportation infrastructure, which includes the Burlington Northern/Santa Fe Railroad and two Metrolink stations, Corona-North Main and Corona-West, providing light rail transit to Los Angeles, San Diego, Long Beach and surrounding areas. The Los Angeles and Long Beach ports are within 60 miles. Three international airports, Ontario International, John Wayne, and Los Angeles International, are also within sixty miles. Another international airport, Palm Springs International, is located 60.87 miles from Corona, and two major public airports, Long Beach Airport, and Hollywood Burbank Airport are within sixty miles. Two major freeways, Interstate 15 and State Highway 91, traverse its boundaries and intersect within them. The City is within 15 miles of both Fed-Ex and UPS Hubs.

Map II-6 below presents Transit Trip Index results by geographical area. According to the Data Documentation: "This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., CBSA). The estimates come from the Location Affordability Index (LAI)...Values are percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit."

Comparison of **Maps II-4** and **II-5** to **Maps II-2** and **II-3** and to **Map II-6** below shows the overlapping of areas with easy access to transportation with some areas of high concentrations of residents in poverty, residents experiencing cost burden, and residents with low educational attainment and low workforce participation. This overlap is prevalent within areas in and around downtown Corona, and along the SR-91 corridor, as well as the neighborhoods northwest of the City along River Road.



Map II-6 Transit Trips and Race/Ethnicity

Housing Profile

Overview

Fair housing is also concerned with the availability of a range of housing types and prices. This section provides an overview of the housing market and of the dynamics affecting housing availability. Later sections of this A.I. study build on this analysis and evaluate the City's Zoning Ordinance and land use regulations to assess the status of fair housing in this community.

Available Housing Units

Table II-13 below shows housing growth trends in Corona as compared to nearby jurisdictions and the County as a whole. Comparison with **Table II-4** (p. 6) shows that the City's population growth between 2000 and 2010 of 19.18 percent mirrors the expansion of Corona's housing inventory at a rate of 20.12 percent between the last two censuses. This is substantially less than the 36.95 percent increase Countywide. The nearby cities of Moreno Valley and Rancho Cucamonga experienced housing growth of 34 percent, placing them in the realm of the County, while other surrounding cities, such as Ontario, experienced relatively minimal growth of 5 percent.

The predominant housing type in Corona remains single-family detached homes, which account for 73.8 percent of the City's housing stock, according to latest ACS estimates (**Table II-17**).

Table II-13
Housing Growth Trends, 2000-2010 (Housing Units)

	'	. 0	,
Community	2000	2010	Percent Change
Moreno Valley	41,431	55,559	34.10%
Ontario	45,182	47,449	5.02%
Rancho Cucamonga	42,134	56,618	34.38%
Corona	39,271	47,174	20.12%
Riverside County	584,674	800,707	36.95%

Source: U.S. Census, 2000 and 2010, QT-H1.

For-Sale and Rental Housing Prices

Table II-14 below shows the median sales price for a single-family home in Corona for the 2018 calendar year. The data show a 3.96 percent average decrease over the previous year in the sales price for single-family homes among the five City zip codes beginning with 928. Condominium units within these zip codes decreased by an average of 0.7 percent. (These zip codes varied greatly, however, in terms of their median sales price activity for

condominiums, from an increase of 18.90 percent within 92883 to a decrease of 11.80 percent in 92882.)

However, the housing market for each zip code presents a unique picture. For residents seeking to purchase single family homes in the 92881 zip code, the 8.4 percent decrease in home prices over last year improves their buying power appreciably. Condominium buyers within the zip code were similarly positioned within the market. By contrast, buyers of single family homes and condominiums in the 92883 zip code were facing very divergent circumstances. Whereas, single family home purchasers saw slight decreases in the average purchase price, condominium purchasers were confronted with prices that zoomed upward nearly 20 percent, significantly hampering their purchasing power. In 2018, the average sales price for single-family homes in Corona is \$502,600 and \$388,200 for condominium units.

Table II-14 Median Sales Prices - 2018

	Single	e Family Hor	nes	Co	ndominiur	ns	SFR Only
Zip Code	Sales of Single Family Homes	Price Median SFR (\$1,000)	Price % Change from Jul. 2017	Sales Count Condos	Price Median Condos (\$1,000)	Price % Change from Jul. 2017	Median Home Price/ Sq. Ft
91719	0	n/a	n/a	0	n/a	n/a	n/a
91720	0	n/a	n/a	0	n/a	n/a	n/a
92879	29	\$455	-2.50%	13	\$309	1.30%	\$273
92880	51	\$543	-3.60%	2	\$477	-0.60%	\$222
92881	24	\$522	-8.40%	5	\$434	-8.50%	\$230
92882	55	\$488	-3.80%	19	\$281	-11.80%	\$275
92883	45	\$505	-1.50%	3	\$440	18.90%	\$216

Source: CoreLogic, Southern California Home Resale Activity, Home sales recorded in March 2019, (https://www.corelogic.com/downloadable-docs/dq-news/dq-news-monthly-charts/march-2019-southland-chart.pdf).

According to the National Low-Income Housing Coalition's (NLIHC) **Out of Reach 2018 Report** for Riverside County, the Fair Market Rent (FMR) for a two-bedroom apartment is \$1,156. In order to afford this level of rent and utilities, without paying more than 30 percent of income on housing, a household must earn \$3,853 monthly or \$46,240 annually (**Table II-16** below). Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$22.23. (http://nlihc.org/oor/california)

In Riverside County, a minimum wage worker earns an hourly wage of \$11.00. In order to afford the FMR for a two-bedroom apartment, a household must include 2.03 minimum

wage earner(s) working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

For Riverside County, the estimated mean (average) wage for a renter is \$13.32 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a household must include 1.68 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

Table II-15
Riverside County Cost of Rental Housing

		Fair Market Rents by Number of Bedrooms								
Voor	Effici	ency	1 Bed	1 Bedroom		ooms	3 Bedro	3 Bedrooms		ooms
Year	FMR	Incr.	FMR	Incr.	FMR	Incr.	FMR	Incr.	FMR	Incr.
2013	\$763		\$879		\$1,116		\$1,577		\$1,924	
2014	\$766	0.39%	\$882	0.34%	\$1,120	0.36%	\$1,582	0.32%	\$1,930	0.31%
2015	\$788	2.79%	\$908	2.86%	\$1,153	2.86%	\$1,629	2.89%	\$1,987	2.87%
2016 ¹	\$798	1.25%	\$945	3.92%	\$1,187	2.86%	\$1,672	2.57%	\$2,056	3.36%
2017	\$800	0.25%	\$957	1.25%	\$1,197	0.84%	\$1,682	0.59%	\$2,072	0.77%
2018	\$768	-4.17%	\$926	-3.35%	\$1,156	-3.55%	\$1,618	-3.96%	\$2,004	-3.39%
2019	\$826	7.02%	\$986	6.09%	\$1,232	6.17%	\$1,717	5.77%	\$2,132	6.00%

Source: HUD Fair Market Rents for Riverside County

(https://www.huduser.gov/portal/datasets/fmr.html - 2019).

1. Note: Beginning in 2016, data reported only for Riverside-San Bernardino-Ontario MSA.

The HUD Fair Market Rents by number of bedrooms beginning in 2013 are shown in **Table II-15** above.

Table II-16
Income Needed to Afford FMR - Riverside County 2018

Annual Income						ercen	t of Fai	mily Al	MI
0 BR.	1 BR	2 BR	3 BR	4 BR	0 BR.	1 BR	2 BR	3 BR	4 BR
\$30,720	\$37,040	\$46,240	\$64,720	\$80,160	47%	56%	70%	98%	122%

Source: National Low Income Housing Coalition, 2018

Table II-16 above shows the annual household income needed to afford rental units at the Fair Market Rent levels. The table shows that it would be impossible for a family earning the area median income to afford even a 0-bedroom unit and spend 30 percent of household income on housing.

Housing Supply

According to the 2013-2017 American Community Survey (DP04), Corona has 49,953 occupied housing units. Of these units, 64.9 percent are owner-occupied and 35.1 percent are renter occupied. Another 1,821 units within the City are unoccupied.

Vacancy rates are an indicator of housing needs. While vacancies help moderate housing costs, excess vacancies depress rents and home values. Generally, an "optimal" vacancy rate is 1.5 percent to 2.0 percent in the for-sale market and 5.0 percent to 6.0 percent for the rental market. According to the latest ACS estimates, Corona's vacancy rate among homeowners is 1.0 percent; among renters, 3.4 percent. These percentages indicate a high level of utilization of the City's available housing units.

Table **II-17** on the following page shows the housing supply in Corona of units in structure by tenure. Of the City's 32,404 total owner-occupied units, the vast majority, 30,080, or 92.9 percent, are single units detached or attached. Of the 17,549 renter-occupied units, the largest share, or 38.5 percent, are also single unit structures.

Table II-17
Housing Supply: Occupied Units in Structure by Tenure in Corona

Number of	Total	Units		Owner			Renter	
Units in Structure	#	%	#	Share of Category	% of Total	#	Share of Category	% of Total
1, detached or attached	36,846	73.8%	30,080	92.9%	80.1%	6,766	38.5%	19.9%
2 to 9 units	5,788	11.6%	620	1.9%	3.8%	5,168	29.4%	96.2%
10 or more units	5,805	11.6%	395	1.2%	1.8%	5.410	30.8%	98.2%
Mobile home and all other types of units	1,514	3.0%	1,309	4.0%	91.5%	205	1.2%	8.5%
Total:	49,953	100.0%	32,404	64.9%	6	17,549	35.1	1%

Source: U.S. Census Bureau, 2013-2017 American Community Survey, S2504.

Homeownership

Table II-18 on the following page shows homeownership percentages relative to rental rates among various racial and ethnic subpopulations within both the jurisdiction and the region. The data show that the percentage of homeowners who are Asian or Pacific Islander within Corona is nearly twice the region's percentage, at 12.19 percent vs. 6.42 percent. However, all other ethnic and racial groups, including Whites, experience homeownership at slightly lower rates within the jurisdiction than the rates at which they experience homeownership regionally. For Whites the rates are 51.09 percent for the jurisdiction and 53.90 percent for the region; for Blacks, the rates are 4.97 and 5.20

respectively; for Hispanics, 29.42 and 32.42 respectively; and for Native Americans 0.38 and 0.40.

Table II-18 Homeownership and Rental Rates by Race/Ethnicity

	(Cor	ona, CA CD	BG) Juriso	liction	(Riverside-San Bernardino-Ontario, CA) Region				
	Home	owners	Re	nters	Homeo	wners	Renters		
Race/Ethnicity	#	%	#	%	#	%	#	%	
White, Non- Hispanic	15,270	51.09%	5,415	37.32%	446,425	53.90%	169,245	36.89%	
Black, Non- Hispanic	1,485	4.97%	1,180	8.13%	43,075	5.20%	53,295	11.62%	
Hispanic	8,795	29.42%	6,485	44.69%	268,520	32.42%	200,830	43.78%	
Asian or Pacific Islander, Non-Hispanic	3,645	12.19%	1,140	7.86%	53,205	6.42%	22,550	4.92%	
Native American, Non-Hispanic	115	0.38%	20	0.14%	3,275	0.40%	2,590	0.56%	
Other, Non- Hispanic	580	1.94%	270	1.86%	13,770	1.66%	10,245	2.23%	
Total Household Units	29,890	-	14,510	-	828,270	-	458,755	-	

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S.

Department of Housing and Urban Development, March 2019.

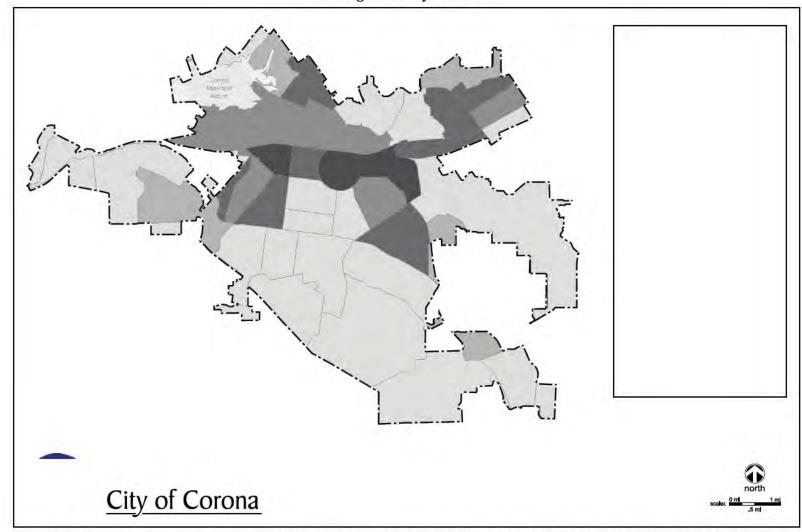
Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: CHAS

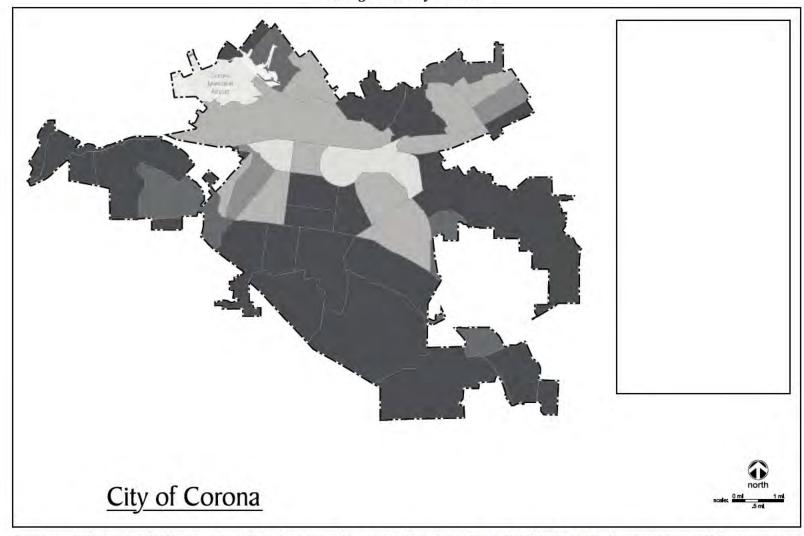
Note 3: Refer to the Data Documentation for details

(http://www.hudexchange.info/resource/4848/affh-data-documentation).

Map II-7 on the following page shows the vast geographic discrepancy in numbers of renters within the jurisdiction, with the highest concentrations of renters located in the downtown portion of the City; west along the SR-91 corridor and south along I-15. **Map II-8** shows the highest concentrations of homeowners are found in the outlying quadrants of the jurisdiction, except for the neighborhoods immediately adjacent to downtown, beginning around W. 10th Street and continuing southward to the City's boundary.



Map II-7 Housing Tenure by Renters



Map II-8 Housing Tenure by Owners

Housing Condition – Age

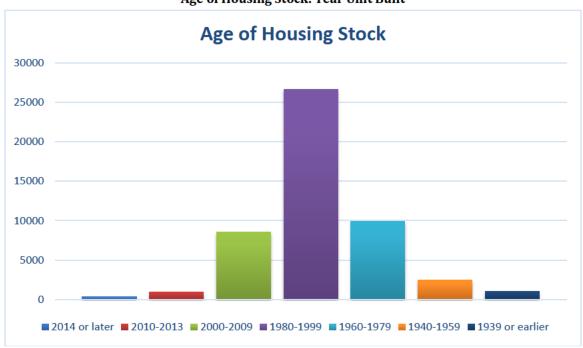
Like any other asset, housing gradually deteriorates over time. If not regularly maintained, housing can deteriorate into disrepair, depress neighboring property values, discourage reinvestment, and eventually impact quality of life in an entire neighborhood. Maintaining quality housing is thus an important community goal. This section analyzes and discusses the age and condition of Corona's housing and its neighborhoods.

Table II-19 and **Graph II-1** indicate the number of homes built in Corona by decade or two-decade period. According to 2013-2017 ACS estimates, 26.9 percent of the housing was at least 35 years old. Within the housing industry, as a general rule, homes older than 30 years begin to require major investments to maintain quality. Necessary improvements include siding, painting, and roofing, among others. After 50 years, homes typically need new plumbing, electrical systems, mechanical systems, lead-based paint removal, and other major repairs.

Table II-19 Age of Housing Stock, City of Corona: Year Unit Built by Tenure

Year	Total	Units		Owner			Renter	
Structure Built	#	%	#	Share of Category	Share of Total	#	Share of Category	Share of Total
2014 or later	383	0.8%	107	0.3%	45.6%	276	1.6%	54.4%
2010 to 2013	948	1.9%	242	0.7%	51.1%	706	4.0%	48.9%
2000 to 2009	8,541	17.1%	6,404	19.8%	53.1%	2,137	12.2%	46.9%
1980 to 1999	26,639	53.3%	17,264	53.3%	57.2%	9,375	53.4%	42.8%
1960 to 1979	9,884	19.8%	6,320	19.5%	52.8%	3,564	20.3%	47.2%
1940 to 1959	2,503	5.0%	1,648	5.1%	57.0%	855	4.9%	43.0%
1939 or earlier	1,055	2.1%	419	1.3%		636	3.6%	
Total:	27,155	100.0%	14,832	100.0%	56.6%	12,323	100.0%	43.4%

Source: U.S. Census Bureau, 2013-2017 American Community Survey, S2504.



Graph II-1
Age of Housing Stock: Year Unit Built

Source: U.S. Census Bureau, 2013-2017 American Community Survey, S2504.

According to HUD, "Aggressive code enforcement action, including the legal process of property receivership, may be the most cost-effective approach to improve the quality of life in particular instances. A receivership action allows for the correction of the deferred maintenance of the common areas, reestablishes and recapitalizes the homeowner's association, and imposes on-site management to address tenant problems." (AFFH-T)

Apart from the receivership option, the City sponsors the Residential Rehabilitation Program to facilitate the rehabilitation of older homes. The Corona Housing Authority states that the program was designed to "provide financial assistance low to moderate income households to rehabilitate and preserve affordable housing. These objectives will be met through the correction of building code violations and addressing health and safety concerns associated with their homes." In its 2017-2018 Consolidated Annual Performance and Evaluation Report (CAPER), the City discloses that the program provided six forgivable loans of approximately \$25,000 to low-income owners of single-family housing, or up to \$25,000 grants to owners of manufactured units. The report states further that the Habitat for Humanity A Brush With Kindness program provided minor exterior home repairs for six owner-occupied housing units. (p. 26)

Housing Problems

The AFFH-T Data Documentation states: "To assist communities in describing and identifying disproportionate housing needs in their jurisdictions and regions, the AFFH-T provides data identifying instances where housing problems or severe housing problems

exist. The AFFH-T presents housing problems overall, as well as variations by race/ethnicity, household type and household size."

The AFFH-T provides data on the number and share of households with one of the following four housing problems:

- 1. Lacks complete kitchen facilities: Household lacks a sink with piped water, a range or stove, or a refrigerator.
- 2. Lacks complete plumbing facilities: Household lacks hot and cold piped water, a flush toilet and a bathtub or shower.
- 3. Overcrowding: A household is considered overcrowded if there are more than 1.01 people per room.
- 4. Cost Burden: A household is considered cost burdened if the household pays more than 30 percent of its total gross income for housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payment, taxes, insurance, and utilities.

Additionally, the AFFH-T provides data on the number and share of households with one or more of the following "severe" housing problems, defined as:

- 1. Lacks complete kitchen facilities: Household does not have a stove/oven and refrigerator.
- 2. Lacks complete plumbing facilities: Household does not have running water or modern toilets.
- 3. Severe Overcrowding: A household is considered severely overcrowded if there are more than 1.5 people per room.
- 4. Severe Cost Burden: A household is considered severely cost burdened if the household pays more than 50 percent of its total income for housing costs.

According to the data in **Table II-20** on the following page, the total number of households within the jurisdiction is 44,400. Of those households, 21,460, or 48.33 percent, experience housing problems. Among those 21,460 households experiencing problems, 11,195, or 25.21 percent of the total, experience severe housing problems. These percentages are roughly in line with the region, wherein the incidences of housing problems and severe housing problems are 49.19 percent and 27.82 percent respectively. Additionally, as is true in the region, Hispanic and Black households within the jurisdiction experience housing problems and severe housing problems at disproportionately higher rates than the average. Specifically, 57.92 percent of Hispanics and 52.91 percent of Blacks experience housing problems, while 34.70 percent of Hispanics and 26.79 percent of Blacks experience severe housing problems.]

Asians within the jurisdiction experience housing problems and severe housing problems at rates similar to those of the region.

Table II-20
Demographics of Households with Disproportionate Housing Needs

	(Corona,	CA CDBG) Jui	risdiction	•	ide-San Bern ario, CA) Reg	
Households experiencing any of 4 housing problems	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	8,410	20,690	40.65%	248,500	615,660	40.36%
Black, Non-Hispanic	1,410	2,665	52.91%	56,215	96,380	58.33%
Hispanic	8,845	15,270	57.92%	276,310	469,370	58.87%
Asian or Pacific Islander, Non- Hispanic	2,314	4,778	48.43%	37,085	75,739	48.96%
Native American, Non-Hispanic	45	130	34.62%	2,874	5,864	49.01%
Other, Non-Hispanic	424	854	49.65%	12,120	24,015	50.47%
Total	21,460	44,400	48.33%	633,100	1,287,025	49.19%
Household Type and Size						
Family households, <5 people	11,250	26,004	43.26%	310,890	715,300	43.46%
Family households, 5+ people	5,855	9,790	59.81%	160,795	249,069	64.56%
Non-family households	4,355	8,595	50.67%	161,420	322,655	50.03%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	3,705	20,690	17.91%	122,935	615,660	19.97%
Black, Non-Hispanic	714	2,665	26.79%	32,125	96,380	33.33%
Hispanic	5,299	15,270	34.70%	174,310	469,370	37.14%
Asian or Pacific Islander, Non- Hispanic	1,199	4,778	25.09%	20,279	75,739	26.77%
Native American, Non-Hispanic	0	130	0.00%	1,499	5,864	25.56%
Other, Non-Hispanic	284	854	33.26%	6,870	24,015	28.61%
Total	11,195	44,400	25.21%	358,025	1,287,025	27.82%

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHAS

Note 4: Refer to the Data Documentation for details

(http://www.hudexchange.info/resource/4848/affh-data-documentation).

Environmental Health Index

According to HUD, "The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level." The Index combines standardized EPA estimates of air quality carcinogenic, respiratory and neurological hazards with indexing census tracts. Values are inverted and then percentile ranked nationally. Values range from 0 to 100: the higher the index value, the less exposure to toxins harmful to human health; or, put differently, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census tract.

The EPA standardizes its estimates of air quality hazards using the National Air Toxics Assessment (NATA), which is EPA's ongoing review of air toxics in the United States. EPA developed NATA as a screening tool for state, local and tribal air agencies. NATA's results help these local agencies identify which pollutants, emission sources and places they may wish to study further to better understand any possible risks to public health from air toxics. EPA suggests that local communities use NATA to "prioritize pollutants and emission source types; identify places of interest for further study; get a starting point for local assessments; focus community efforts; inform monitoring programs." According to EPA, communities have found that using NATA helps "inform and empower citizens to make local decisions about their community's health. Local projects often improve air quality faster than federal regulations alone."

Although EPA characterizes NATA results as "a snapshot of outdoor air quality with respect to emissions of air toxics," it nonetheless suggests long-term risks to human health if air toxics emissions are steady over time, including estimates of the cancer risks from breathing air toxics over many years. It also estimates non-cancer health effects for some pollutants, including diesel particulate matter (PM). It is important to note that NATA only includes outdoor sources of pollutants, and its estimates of risk "assume a person breathes these emissions each year over a lifetime (or approximately 70 years). NATA only considers health effects from breathing these air toxics. It ignores indoor hazards, contacting or ingesting toxics, and any other ways people might be exposed." (http://www.epa.gov/national-air-toxics-assessment/nata-overviewepa.gov)

Table II-12 earlier in this chapter (Section D, p. 24) presents the Environmental Health Index values for various groups within Corona and within the region at large. Environmental Index scores for the jurisdiction were slightly lower on average than those for the region, at 45.65 compared to 48.12. Whites fared worse in terms of their ability to access a healthy environment within the jurisdiction by a factor of 6 index points as compared to their regional counterparts, at 49.48 versus 55.48. Asians, by contrast, fared better by a factor of 6.41 index points, 48.70 versus 42.29. For residents below poverty, the jurisdiction provides a measurably less healthful environment, averaging a score of 38.33 for its sub-poverty population, compared to the regional average of 46.86. Asians in poverty are the exception to this rule, with an index score of 45.16 in the jurisdiction versus 39.74 in the region.

The largest differential is seen with respect to the Native American community within the region, whose score of 56.24 represents a 30 percent increase over the jurisdiction's score of 43.16. For its community living under poverty, the differential is 88 percent, at 50.63 versus 27.00. This sharp contrast suggests significantly higher long-term risks to human health from air toxics for Corona's Native American population, when compared to the region's Native American population, especially those living in poverty.

Map II-9 on the following page below shows by relative degrees of shading, the overall Environmental Health Index scores for the entire jurisdiction. The only census tracts achieving Index scores in the 50.1 to 60 range are in the southern and extreme southeasterly regions of the City, many of these encompassing wilderness or sparsely settled areas abutting the boundary with the County of Orange, and extending toward the Temescal Valley.



Map II-9
Demographics and Environmental Health

Affordable Housing

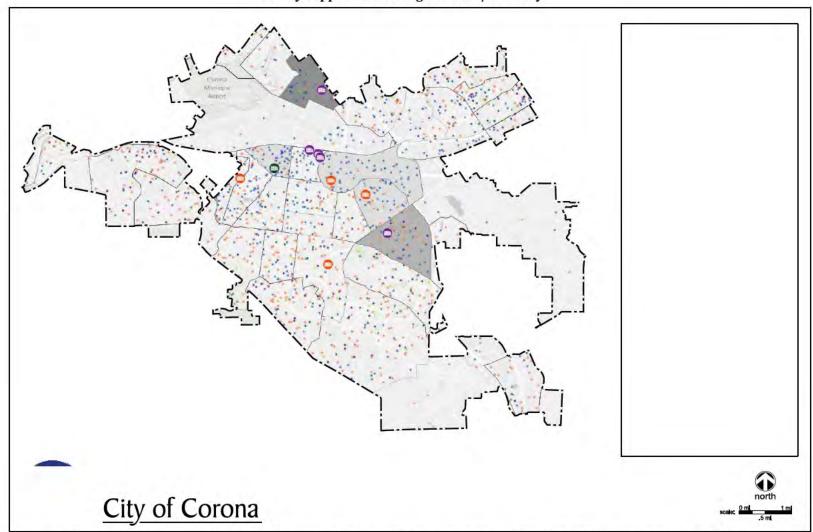
The Corona Consolidated Plan updates a table in the City of Corona Housing Element, 2013-2021, which was adopted January 27, 2014, that contained an at-risk housing analysis for the period that extends from October 15, 2013, through October 15, 2023. The underlying income use restrictions of these projects were reviewed for potential conversion to market rate during this planning period. These projects are listed in **Table II-21** with detailed information. As of May, 2020, the City has a total of 1,375 affordable housing units that are not at risk of conversion to market rate housing. There are 35 additional units at Corona Community towers with a HUD Project-Based Rental Assistance contract that is currently set to expire in 2022. However, it is likely this contract will be renewed and additional preservation actions are not contemplated. Together, these projects consist of a total of 1,390 units in which 1,375 units are restricted to low- and moderate-income households. Table 31 provides a description of the assisted housing developments in Corona. All multifamily rental units assisted under federal, state, and/or local programs, including HUD programs, state and local bond programs, redevelopment programs, density bonus, or direct assistance programs, are included in Table 31.

Table II-21
Assisted Housing Developments in Corona

Project Name	Location	Total Units	Total Affordable Units	Туре	Date of Potential Conversion	Type of Assistance
Corona del Rey	1148 D. St.	160	160	Very Low, Low, Moderate	Perpetuity	Revenue Bond, Low/Mod Funds, City HOME, County HOME, Federal Tax Credits
Casa de la Villa	313 S. Vicentia Avenue	75	74	Very Low, Low	2060	Low/Mod Funds, Federal Tax Credits, Developer Funds
Citrus Circle Apartments	121-141-161 Buena Vista	61	60	Very Low Low	2069	NSP, Federal Tax Credits, CHA
Corona de Oro	630-650 W. 2nd Street	72	71	Very Low	2055	Low/Mod Funds, HOME Funds, Federal Tax Credits
Corona Community Towers	910 S. Bell Avenue	36	35	Very Low	2022*	Project Based Rental Assistance
Corona Community Villas	2680 S. Main Street	75	74	Very Low	2073	Project Based Rental Assistance; Federal Tax Credits
Corona Park Apartments	956 – 976 Avenida del Vista	160	158	Very Low	2072	Project Based Rental Assistance; Federal Tax Credits
Garrison House	779 Ford Street	7	6	Very Low	2027	Project Based Rental Assistance; HUD 202
Meridian Apartments	1066 E. Sixth Street	85	84	Very Low Low	2071	HOME, Federal Tax Credits, CHA
Mission Apartments	526 W. 6th Street	12	12	Very Low	Perpetuity	HOME, NSP
Park Place (Bridges America)	935, 945, 950 W. Fifth Street	48	48	Very Low, Low, Moderate	2027	Low/Mod Funds, Developer Funds
River Run Senior Apartments	863 River Road	360	356	Very Low, Low	2055	Low/Mod Funds, Federal Tax Credits
Vintage Terrace Apartments	1910 Fullerton Street	200	197	Low	2054	HUD and Federal Tax Credits
William C. Arthur Terrace Apts.	1275 W. 8 th Street	39	40	Very Low	2044	Project Based Rental Assistance; HUD 202
	Total	1,390	1,375			

Source: City of Corona Consolidated Plan

Map II-10 shows the locations of various types of publicly supported housing, including shaded areas indicating percentage levels of voucher units. Most public housing units are in and around downtown. Although these areas are ethnically diverse and prone to high poverty exposure and high levels of cost burden, the degree to which these issues affect public housing is mitigated as these developments and participating units radiate outward from downtown, especially to the south and west toward neighborhoods with lower poverty exposure, higher performing schools, better labor force engagement and higher levels of human capital.



Map II-10
Publicly Supported Housing and Race/Ethnicity

Map II-11 on the following page below shows the locations of rental units affordable to families earning 50 percent AMI that rent for 30 percent or less than household income. The darkest shaded areas indicate the regions with the greatest density of affordable housing. These areas are generally clustered just south and east of downtown Corona. Another area with a high percentage of affordable units is slightly north and east of downtown, bordered by the I-15 and Hidden Valley Parkway.

With the exception of the neighborhood due west of downtown, these are generally areas with low poverty exposure, better environmental health, higher homeownership rates, and higher employment and educational attainment levels than the downtown area itself and the area abutting it to the north and westward along the SR-91 corridor.

City of Corona

Map II-11
Location of Affordable Rental Housing
Units renting at or less than 30% of household income for households at 50% AMI

Table II-22 shows the racial and ethnic makeup of affordable housing residents within the City, as well as the distribution of income levels among these household groups. The data show that Project based Section 8 and Other Multifamily housing skew toward Hispanics, who comprise 48.53 percent of Section 8 housing residents and 66.67 percent of Other Multifamily housing, despite comprising only 34.39 percent of the City's total households. Blacks make up 6.00 percent of the City's population, but comprise 17.07 percent of Housing Choice Voucher (HVC) program residents and 12.82 percent of Other Multifamily housing residents.

Almost three-quarters, or 72.46 percent, of Hispanic households earn between 0 to 80 percent of AMI. This compares to 50.66 percent of Blacks who are low to moderate-income, 38.95 percent of Asians, and 36.30 percent of Whites.

Within the statistical region, 94.02 percent of Hispanics are low-mod income, as are 97.87 percent of Blacks, 59.76 percent of Asians, and 57.74 percent of Whites.

Table II-22
Publicly Supported Households by Race/Ethnicity

(Corona, CA CDBG) Jurisdiction Race / Ethnicity	Wl	hite	Bla	ack	Hispa	nnic	Asian oi Islai	r Pacific nder
Housing Type	#	%	#	%	#	%	#	%
Public Housing	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	85	41.67%	6	2.94%	99	48.53%	14	6.86%
Other Multifamily	4	10.26%	5	12.82%	26	66.67%	4	10.26%
HCV Program	152	46.34%	56	17.07%	100	30.49%	18	5.49%
Total Households	20,690	46.60%	2,665	6.00%	15,270	34.39%	4,778	10.76%
0-30% of AMI	1,235	37.60%	210	6.39%	1,485	45.21%	229	6.97%
0-50% of AMI	1,955	28.19%	375	5.41%	3,460	49.89%	544	7.84%
0-80% of AMI	4,320	33.31%	765	5.90%	6,120	47.19%	1,088	8.39%
(Riverside-San Bernardino-Ontario,	W	hie.	Black Hisp			Asian or Pacific Islander		
CA) Region	VVI	nite	Віа	ack	ніѕра	inic		
	#	%	#	%	#	mic %		
CA) Region							Islaı	nder
CA) Region Housing Type	#	%	#	%	#	%	Islaı #	nder %
CA) Region Housing Type Public Housing	# 108	% 17.45%	# 203	% 32.79%	# 265	% 42.81%	# 42	% 6.79%
CA) Region Housing Type Public Housing Project-Based Section 8	# 108 1,245	% 17.45% 24.20%	# 203 1,055	% 32.79% 20.51%	# 265 2,439	% 42.81% 47.41%	# 42 366	% 6.79% 7.12%
CA) Region Housing Type Public Housing Project-Based Section 8 Other Multifamily	# 108 1,245 672	% 17.45% 24.20% 31.88%	# 203 1,055 252	% 32.79% 20.51% 11.95%	# 265 2,439 770	% 42.81% 47.41% 36.53%	# 42 366 404	6.79% 7.12% 19.17%
CA) Region Housing Type Public Housing Project-Based Section 8 Other Multifamily HCV Program	# 108 1,245 672 4,542	% 17.45% 24.20% 31.88% 24.88%	# 203 1,055 252 8,293	% 32.79% 20.51% 11.95% 45.43%	# 265 2,439 770 4,965	% 42.81% 47.41% 36.53% 27.20%	# 42 366 404 386	% 6.79% 7.12% 19.17% 2.11%
CA) Region Housing Type Public Housing Project-Based Section 8 Other Multifamily HCV Program Total Households	# 108 1,245 672 4,542 615,660	% 17.45% 24.20% 31.88% 24.88% 47.84%	# 203 1,055 252 8,293 96,380	% 32.79% 20.51% 11.95% 45.43% 7.49%	# 265 2,439 770 4,965 469,370	% 42.81% 47.41% 36.53% 27.20% 36.47%	# 42 366 404 386 75,739	% 6.79% 7.12% 19.17% 2.11% 5.88%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: Numbers presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details (http://www.hudexchange.info/resource/4848/affh-data-documentation)

Special Housing Needs Profile

Certain residents have more difficulty finding decent and affordable housing or receiving fair housing treatment due to special circumstances. These circumstances may include employment and income, family type, disability, or other characteristics. Corona officials should consider addressing the particular needs of certain racial/ethnic groups, who make up a growing demographic that experiences cost burden and other housing problems disproportionately, in addition to other fair housing issues. Seniors are another burgeoning population sector with similar issues. Single parent households, especially those headed by women, are growing in number and may need special accommodation. Other groups facing challenges include people with disabilities, large families, persons with limited English proficiency, and currently and formerly homeless persons.

Table II-23 summarizes the proportions of special needs groups in Corona. The following discussion describes and analyzes the housing needs of each group. Data are from the 2013-2017 American Community Surveys (ACS).

Table II-23 Special Needs Groups in Corona

Special Needs	2017				
	Number	Percent of City			
Senior Citizens ¹	10,823	21.7%			
People with Physical Disability ²	13,384	8.2%			
Single-Parents with Children ³	3,963	7.9%			
Large Households ⁴	8,889	17.8%			
Hispanics ⁵	71,506	43.7%			
Black/African American	8,480	5.2%			
Asians	18,940	11.6%			
Limited English Proficiency ⁶	20,786	13.6%			
Homeless ⁷	72				

Source: 2013-2017 American Community Survey, ACS.

- 1. Percent of total households with a member age 65 or older, 2013-2017 ACS, DP02.
- 2. Percent of total civilian non-institutionalized population, 2013-2017 ACS, DP02.
- 3. Percent of total households, single parent with own children under 18 years, 2013-2017 ACS, DP02
- 4. Percent of total households with five or more members residing in a home, 2013-2017 ACS, B11016.
- 5. Percent of total population, 2013-2017 ACS, DP05.
- 6. Percent of total population 5 years and over, 2013-2017 ACS, S0501.
- 7. Data is provided by the County of Riverside and is updated on a yearly basis (https://corstat.coronaca.gov/Government/CorStat-Unsheltered-Homelessness/tp3t-vhhi).

Racial/Ethnic Minorities

Section B of this Chapter outlines the fact that while the percentage of the population within Corona that identifies as "White alone, not Hispanic or Latino" continues to decline along with that of the region, with current estimates placing the percentage at 36.5 (2013-2017 ACS DP05), Non-White populations have grown astronomically since 1990. This growth includes a greater than 175 percent increase in the Hispanic population within the City, and a near trebling in size of the same group within the region as a whole.

According to **Table II-22** in Section E above, almost three-quarters, or 72.46 percent, of Hispanic households are low to moderate-income. This compares to 50.66 percent of Blacks, 38.95 percent of Asians, and 36.30 percent of Whites. Within the statistical region, 94.02 percent of Hispanics are low-mod income, as are 97.87 percent of Blacks, 59.76 percent of Asians, and 57.74 percent of Whites.

Hispanics, Blacks, and Asians, as individual groups, are more susceptible to cost burden within the City of Corona than the population in general (**Table II-9**, p. 14). They also experience housing problems and severe housing problems disproportionately. In addition, rates of homeownership for Hispanics and Blacks lag not only behind their White counterparts within the jurisdiction, but also behind members of their own groups within the region. In fact, with the exception of Asian or Pacific Islanders, all other ethnic and racial groups, including Whites, experience homeownership at slightly lower rates within the jurisdiction than the rates at which they experience homeownership regionally. (Table II-18, p. 37) When homeownership rates for a given group are compared to the percentages of these groups within the general population, a truer picture becomes apparent. Whites currently make up 38.13 percent of the City's population, but fully 51.09 percent of its homeowners. For Blacks, at 5.44 percent of the population, the homeownership rate is 4.97 percent; and Hispanics, who make up 43.67 percent of Corona's population, comprise only 29.42 percent of its homeowners.

Map II-2a, (Section C above) shows that the neighborhoods in Corona with the lowest poverty index scores, and thereby the highest exposure to poverty, all lie along a lightly-shaded swath that encompasses the central part of the City, from the SR-91 corridor to the north and west, to the downtown area within the West Grand Boulevard circle, and extending toward Home Gardens to the east. An even higher concentration, with an Index score in the 0-10 percent range, lies directly west of downtown, along 6th Street and bordered by South Lincoln Boulevard. Map II-2b shows a high concentration of Mexicanborn residents in the regions with the lowest Index scores, indicated by a preponderance of orange dots. Map II-2c shows a fair distribution of families with children within the highest poverty areas, as indicated by large purple dots, representing regions with concentrations of 80.1 to 100 percent of families with children.

Maps II-7 and **II-8** (Section E) show the geographic disparity between homeowners and renters in the jurisdiction, with the highest concentrations of renters located in the downtown portion of the City; west along the SR-91 corridor; and south along I-15. **Map II-8** shows the highest concentrations of homeowners are found in the outlying quadrants of

the jurisdiction, with the exception of the neighborhoods immediately adjacent to downtown, beginning around W. 10th Street and continuing southward to the City's boundary. Maps II-3a and 3b (Section C) shows the similarly elevated levels of housing burden within the central part of the City. These areas are heavily Hispanic, indicated by the prevalence of blue dots, and, as Map 3b shows, are also home to large numbers of Mexican nationals, indicated by the preponderance of orange dots. Other areas appearing to have concentrations of housing burden of greater than 53.33 percent are located around the northern boundaries of the City, along River Road, and crossing the I-15 north of downtown. These areas also appear to be home to large numbers of Mexican nationals. Map II-9 (Section E) shows the higher propensity toward environmental health hazards within these same census tracts, indicated by the lightest shading. Map II-10 shows a concentration of affordable housing developments within these census tracts, but also shows a distribution of affordable housing toward the southern quadrants of the City, which have superior access to opportunity.

Table II-12 (Section D) shows various opportunity index scores that HUD has calculated for the jurisdiction as a measure of relative access to opportunity in such important facets of life as education, employment, and transportation. Analysis of these indices shows that with the exception of their ability to access high job proximity and a healthy environment, residents of the city of Corona enjoy a relatively high quality of life, compared to residents of the region generally. Corona scores higher than the region consistently across various protected groups, meaning that members of most racial and ethnic groups within Corona enjoy superior access to high performing schools, high labor market participation, low transportation costs, good public transit, and relatively low exposure to poverty. Further, the level of integration of these groups within the City buck's the regional trend toward increased segregation.

While individual ethnic groups in the City have seen their segregation levels rise slightly since 1990, an examination of overall trends reveals a slight tendency toward improved integration of Non-Whites within the City generally, with the Non-White/White dissimilarity Index decreasing from 26.82 in 1990 to 26.79 currently. (**Table II-6**, Section B, p. 10) This picture stands sharply in contrast to the region, which has seen its Non-White/White Dissimilarity Index increase by 25.4 percent during the same period. Every ethnic/racial group within the City fares better than its regional counterparts.

Senior Citizens

According to the 2010 Census, 7.51 percent of Corona's residents were seniors, defined as persons age 65 or older. This statistic represents a 144 percent increase in absolute numbers for this population since 1990. American Community Survey (ACS) estimates for 2017 place the percentage of seniors in Corona at 9.7 percent, which represents an 237 percent increase since 1990. By either measure, seniors comprise a significant and growing contingent of Corona residents, who need particular accommodation in the area of housing, due to limited income and higher disability rates, including ambulatory and other disabilities that require significant retrofitting of housing units.

In terms of income, 7.9 percent, or 959, of 12,196 Corona residents age 65 or over for whom poverty status could be determined, were seniors who reported incomes below the poverty level over the last year. (2009-2013 ACS, S1701). In terms of disabilities, 7.81 percent of City residents over 5 years of age have disabilities. As shown in **Table II-24** below, the largest share of disabled persons within the City is persons between the ages of 18 and 64 and represents 3.89 percent of the total population over 5 years of age. At 5,585, this number represents 5.75 percent of the 97,097 total City residents within this age group (age 18-64). By comparison, the 4,520 disabled persons age 65 and older represent over one-third, or 37.06 percent, of the total of 12,196 elderly persons within the community.

Table II-24
Disability by Age Group

	(Corona, CA CDBG) Jurisdiction		(Riverside-San Bernardino- Ontario, CA) Region	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	1,113	0.77%	37,092	0.95%
age 18-64 with Disabilities	5,585	3.89%	241,640	6.19%
age 65+ with Disabilities	4,520	3.15%	174,002	4.46%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, March 2019.

Note 1: All % represent a share of the total population over 5 years within the jurisdiction or region.

Note 2: Data Sources: ACS, 2009-2013, DP05.

Note 3: Refer to the Data Documentation for details

(http://www.hudexchange.info/resource/4848/affh-data-documentation).

Thirty-four residential care facilities for the elderly are licensed in the City of Corona. In addition, there are two licensed adult day care facilities, and another thirty adult residential facilities. These facilities are dispersed throughout the jurisdiction, and residents and their visitors have access to major public transit routes. However, the cost of such facilities is out of range for many seniors and their families. While Medical covers the cost of residential care for some who qualify, others could maintain their independence longer in thoughtfully designed senior public housing that offers case management, meal services, transportation to and from doctors' offices, grocery stores and senior centers, as well as other on-site programs designed to prevent social isolation. Still other seniors, with targeted intervention and support, could be helped, in the parlance of social service professionals, to "age in place," within their own homes. For many, this requires assistance with deferred home repairs and maintenance, especially with costly major repairs such as roofs, HVAC systems and water heaters, as well as with necessary retrofits to accommodate ambulatory and other disabilities.

The Housing Division lists on the City's website five residential developments that offer affordable housing to seniors and that are operated by the Housing Authority of the City of Corona. They include the following:

- River Run,791 River Road;
- William C Arthur Terrace Apts., 1275 W. 8th Street;
- Corona Community Towers, 910 S. Bell Avenue;
- Vintage Terrace, 1910 Fullerton Avenue;
- Corona Community Villas, 2680 S. Main Street.

Table II-25 shows that although seniors are well represented within Section 8 and HCV programs, and are exclusive beneficiaries of Other Multifamily programs within the County, the numbers accommodated by these programs come nowhere near to meeting the need, as evinced by the numbers of seniors within poverty and by the numbers with disabilities. For example, the 64.76 percent of the total of 206 Non R/ECAP tract units in the Project-based Section 8 program within Corona that are occupied by seniors amount to 133 units. Added to the other units available to seniors, the total of publicly supported housing units dedicated to seniors is 430. This number is far from adequate to meet the needs of the 959 elderly persons in poverty or the 4,520 disabled elderly within Corona. By latest ACS estimates, there are as many as 1,527 elderly persons in poverty, representing 9.8 percent of Corona's estimated 15,559 seniors, and as many as 5,143 disabled elderly (2013-2017 ACS, S1810).

Table II-25
Demographics by Publicly Supported Housing Program Category

(Corona, CA CDBG)	Total # units (occupied)	White	Black	Hispanic	Asian or Pacific Islander	Families with children	Elderly	Disabled
Public Housing								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Project-based Section 8								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	206	41.67%	2.94%	48.53%	6.86%	21.43%	64.76%	8.10%
Other Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	38	10.26%	12.82%	66.67%	10.26%	N/a	100.00%	0.00%
HCV Program								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	350	46.34%	17.07%	30.49%	5.49%	11.59%	73.91%	42.61%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, March 2019.

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH

Note 3: Refer to the Data Documentation for details

(http://www.hudexchange.info/resource/4848/affh-data-documentation).

Note 4: Rows for R/ECAP tracts removed because there are no Racially or Ethnically Concentrated Areas of Poverty in Corona.

For those elderly who are not home bound, the Corona Senior Center facility offers "an opportunity for adults 50 years of age and older to develop an extended family through a wide range of health and educational programs, human services, recreational and social activities, and special events throughout the year. The Center hosts a variety of educational lectures throughout the year. Doctors, nutritionists, insurance providers, lawyers, and life coaches present on topics to benefit our seniors." Lectures are free to attend.

According to the City's website, the Center's primary goal is to "promote a healthy and active lifestyle for our patrons. Recreational and social activities include Yoga, Line Dancing, Balance & Flexibility, Ballroom Dancing, Chair Volleyball, Longevity Stick, Sisterhood Stretch & Share Circle, and Men's & Women's Exercise. There is also a small

Fitness Room for patrons to utilize during the day. For those who fancy the arts, classes and clubs are available. These include Acoustic Music Circle, Knitting & Crocheting, the Mixed Media, Photography, and the Writing Clubs." (https://www.coronaca.gov/government/departments-divisions/library-recreation-services/recreation-services/senior-center)

Other Corona services for seniors include:

- Corona Cooling/Warming Centers;
- Dial A Ride:
- Innovate California PACE:
- Meals on Wheels;
- Purple Cities Dementia Awareness, Caregiver Support and Resources;
- · Riverside County Network of Care;
- Riverside County Office On Aging.

People with Disabilities

The Fair Housing Act prohibits housing discrimination against any person based on disability. The Americans with Disabilities Act defines a disability as a "physical or mental impairment that substantially limits one or more major life activities." People with disabilities have special housing needs because of their fixed income, higher health costs, and need for accessible and affordable housing. According to the data in **Table II-24** above, 7.81 percent, or 11,218 Corona residents over the age of 5 years, reported a physical disability. More recent ACS estimates place this percentage at 8.8 percent, or 13,354 disabled residents. (2013-2017 ACS, S1810)

Table II-24 reveals that that the City of Corona has 6,698 disabled residents ages 5 to 64, and another 4,520 elderly residents age 65 and over with disabilities. **Table II-26** below reveals the numbers living with each different type of disability within the community. The fact that the total exceeds the numbers of disabled reported in census and ACS data implies that individuals report multiple types of disability. According to **Table II-25**, the City accommodates the highest number of disabled individuals in its Housing Choice Voucher program, 42.61 percent of 350 units, or 149 units occupied by disabled residents.

Table II-26 Disability by Type

	(Corona, Jurisd	CA CDBG) iction	•	an Bernardino- CA) Region
Disability Type	#	%	#	%
Hearing difficulty	2,986	2.08%	125,033	3.20%
Vision difficulty	2,398	1.67%	86,934	2.23%
Cognitive difficulty	4,230	2.95%	170,114	4.36%
Ambulatory difficulty	5,964	4.15%	241,262	6.18%
Self-care difficulty	2,758	1.92%	102,841	2.63%
Independent living difficulty	4,501	3.13%	170,490	4.37%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, March 2019.

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details

(http://www.hudexchange.info/resource/4848/affh-data-documentation).

Note 4: The AFFH-T provides information on disability type, disability status by age group, and disability status by housing type. The disability type and disability status by age group measures are from the ACS, while the measure of persons with disabilities by housing type is from the PIC/TRACS data. These disability type categories in this table are based on a new set of disability questions introduced into the ACS in 2008 and are not comparable to disability type figures in prior years.

Apart from ADA compatible housing, both privately owned and in the publicly assisted realm, persons with disabilities need accommodation in the form of city infrastructure, from sidewalks, curbs, and crossing signals, to ramps, restrooms and other features within public buildings, all of which are fundable through CDBG monies.

Family Status and Age

According to the AFFH-T Data Documentation, "The Fair Housing Act prohibits housing discrimination against any person based on familial status. For purposes of the Fair Housing Act, familial status includes one or more individuals under the age of 18 being domiciled with a parent or other person with legal custody of such individuals. The AFFH-T provides information on families with children. Specifically, familial status is measured as the number and percentage of all families (with two or more related people in the household) that are families with children under age 18."

As stated in **Table II-1** (Section B, p. 2), families of all types continue to make up the vast share of the City's population, though that share has diminished from a high of 82.1 percent in 2010 to current estimates of 74.7 percent. Other Family households, consisting of a

parent of either sex maintaining a household with no spouse present, have increased by 28.34 percent. Notably, the growth of these single parent households is greater than that of traditional married families with children, at 21.89 percent. Interestingly, 2017 ACS data identify a sizeable majority, 64.26 percent, or 5,142 of these 8,002 "Other Families," as "Female householder, no husband present, family household." This emerging demographic of single mothers within the jurisdiction will need special accommodation with regard to housing, because of gender pay gaps, the high cost of day care, and the propensity for histories of spousal abuse.

Family households (defined by the Census Bureau for data purposes to mean two or more individuals who are related by birth, marriage, or adoption, although they also may include other unrelated people) generally earned better incomes than nonfamily households. Married-couple family households earned the highest incomes among household types in Corona, with 78.1 percent earning more than \$50,000 per year and 46.9 percent earning more than \$100,000 per year. Nevertheless, families with children in general have special housing needs due to demands upon income, such as the need for affordable childcare, the need for affordable housing, or the need for larger units with 3 or more bedrooms. **Table II-4** demonstrates the jurisdiction's trend toward a decreasing proportion of families with children, from a high of 61.34 percent of all family households in 2000, to 55.62 percent currently. Families with children, and especially teenagers, may face discrimination in the rental housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex or unit, confine children to a specific location, limit the time children can play outdoors, or choose not to rent to families with children altogether.

Large families often have difficulty finding adequately sized housing and may lease smaller units due to affordability concerns, which results in overcrowding. **Table II-20** (Section E, p.43) shows that large families (5+ members) experience housing problems disproportionately within Corona, at 59.81 percent, vs. 48.33 percent of households generally. According to the 2009-2013 Comprehensive Housing Affordability Strategy (CHAS) data in **Table II-20**, the City had 9,790 large families.

Table II-27
Publicly Supported Housing by Program Category:
Units by Number of Bedrooms and Number of Children (Corona Only)

	Households in 0-1 Bedroom Units		2 B	eholds in edroom Jnits		seholds in Bedroom Units	Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	0	0.00%	0	0.00%	0	0.00%	N/a	N/a
Project-Based Section 8	142	67.62%	46	21.90%	20	9.52%	45	21.43%
Other Multifamily	40	100.00%	0	0.00%	0	0.00%	N/a	N/a
HCV Program	242	70.14%	73	21.16%	18	5.22%	40	11.59%

Source: Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), U.S. Department of Housing and Urban Development, March 2019.

Note 1: Data Sources: APSH

Note 2: Refer to the Data Documentation for details

(http://www.hudexchange.info/resource/4848/affh-data-documentation

Table II-27 above shows that 46 households are assigned to 2-bedroom units in the City's Project-based Section 8 housing, and another 20 households are assigned to 3-bedroom units. A total of 45 units, representing 21.43 percent of the total, are occupied by families with children. In the Housing Choice Voucher program, a total of 40 units, or 11.59 percent of the total, are occupied by families with children. Other Multifamily housing does not appear to be available to households with children. Given the ACS recent estimates (2013-2017 ACS, S1702) placing the number of large families in poverty around 969, the numbers of available units in **Table II-27** appear inadequate.

National Origin and Limited English Proficiency (LEP)

According to HUD, "The Fair Housing Act also prohibits housing discrimination based on national origin." The data provided in the AFFH-T includes the ten most common places of birth of the foreign-born population by jurisdiction and region and the number and percentage of the population that is foreign-born. Also included are the ten most common languages spoken at home (for the population age 5 years and over) for those who speak English "less than 'very well," and the number and percentage of the population who speak English "less than 'very well." For space-saving purposes, only five out of the top ten places of birth and most common languages were included in **Table II-2** and **Table II-3** in Section B above.

According to the data in those tables, the largest foreign-born population within the jurisdiction and the region is from Mexico, making up 13.08 percent of Corona's residents. These 18,832 foreign-born nationals include residents who have less than a fluent mastery of the English language, and therefore need accommodation. Corona residents with Limited English Proficiency (LEP) are among the fastest growing population subgroup, having increased their numbers 97.44 percent from 10,196 in 1990 to 20,131 currently. As a

percent of the population, their numbers have increased from 12.49 percent to 13.21 percent. Given that four of the five most populous groups of foreign nationals in the jurisdiction hale from Asian countries, namely the Philippines, India, Vietnam, and Korea, the availability of online and printed materials and foreign language interpreters in Tagalog, Urdu, Hindi, Vietnamese, and Korean, in addition to Spanish, should be common practice within City agencies involved in delivery of affordable housing and other services to these communities.

Homeless Persons

Housing affordability for those who are homeless or who are formerly homeless is challenging from an economics standpoint, and this demographic group may also encounter fair housing issues when landlords refuse to rent to formerly homeless persons due to poor credit history. These difficulties are more severe for homeless families that need larger affordable units. According to the Riverside County's Point-in-Time Homeless Count, 72 individuals in Corona were homeless in 2018.

The need with respect to homelessness is for permanent housing solutions with supportive services that help formerly homeless individuals address any number of factors contributing to their situation. Permanent supportive housing is the term of art within the social services sector that describes an affordable living environment that offers the ongoing case management, linkage to care, employment counseling, ongoing job skills training, transportation services, and even financial counseling that this community needs to stay housed and productive. Without such support, their risks of remaining homeless or returning to homelessness in a chronic manner are great.

The City of Corona is actively engaged in a range of coordinated efforts and collaboration among City staff, volunteers, and nonprofit and private organizations to address homelessness. At a Study Session held on January 23, 2019 Corona City Council Members created the 2019 Homelessness Resources Committee. The committee meets on a regular basis with community stakeholders to "make positive changes in the lives of the homeless, while also respecting the rights of home and business owners." On April 5, the City of Corona launched a "Homeless Outreach" data dashboard to display current statistics, resources, and outreach efforts. (https://corstat.coronaca.gov/stat/goals/single/j4w2-khkq)

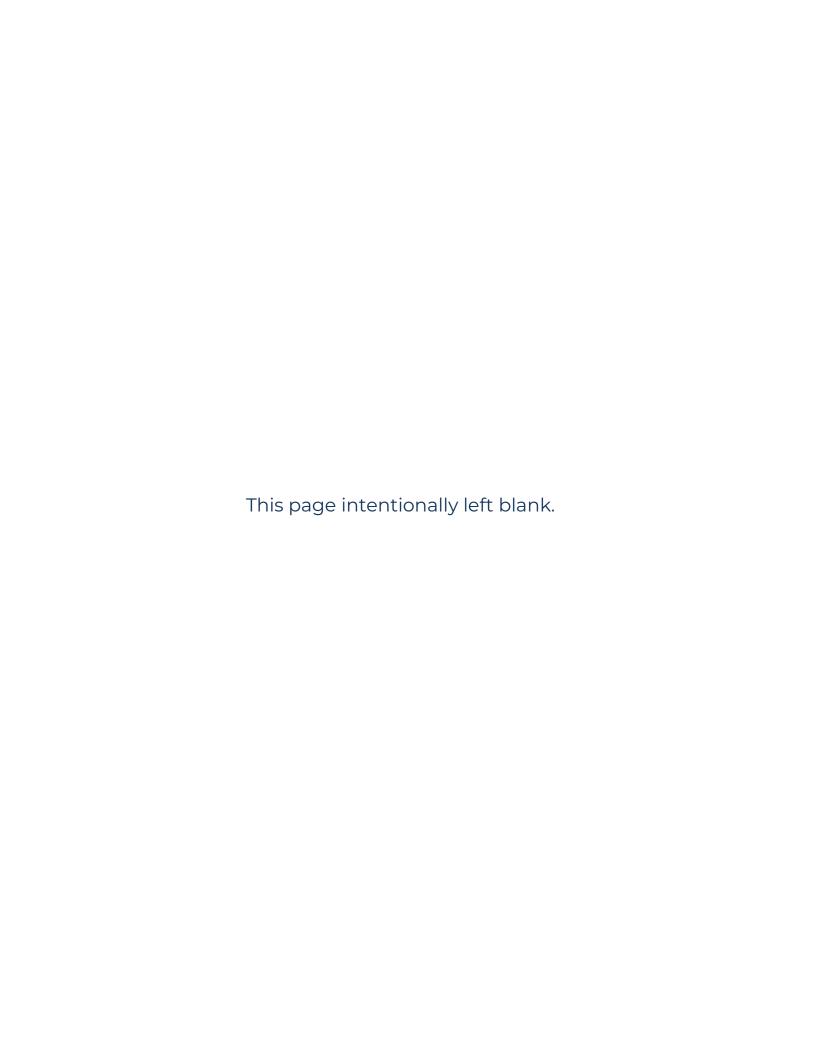
Corona has also entered into a contractual arrangement with City Net, a team of nonprofit professionals that seeks to unite city and county agencies, law enforcement, non-profit organizations, businesses, advocacy groups, concerned citizens and the faith community in a singular effort to address and end homelessness in the community.

According to the City's website, "City Net also deploys staff in direct service provision through street outreach and case management services. Street outreach seeks to connect unsheltered homeless neighbors with emergency shelter, housing, or critical services, and providing urgent, non-facility-based care. These activities are intended to help homeless neighbors obtain appropriate supportive services, including permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services

essential for achieving independent living; housing stability case management; and other Federal, State, local, or private assistance available to assist the program participant in obtaining housing stability."

The site goes on to state, "City Net also works to mobilize community resources, including meals, volunteers, donations and advocacy, to coordinate care in emergency shelters, parks, and other public areas where homeless neighbors live. These efforts seek to reduce wasteful duplication and fill missing gaps in the continuum of care, with the long-term goal of ending homelessness by providing homeless neighbors a stable context in which their emergency needs are met, so they can work on long-term housing plans." http://www.citynet.org/corona

Homelessness occurs for varied reasons and requires different resources and services for each homeless individual. Serving the needs of this population is complex. The aim is to provide a system that coordinates and focuses resources to those most in need and least able to advocate for themselves. Addressing homelessness requires effective strategies to reduce the number of families and individuals who become homeless, in addition to helping currently homeless families and individuals move into permanent housing.



Analysis of Private Sector Impediments

Fair housing opportunity is covered by federal and State regulations and court decisions that prohibit discrimination in the rental, sale, negotiation, advertisement, or occupancy of housing on the basis of protected class. Implementation of fair housing practices is achieved through a network of realtors, apartment associations, housing associations, fair housing providers, and the courts. This chapter provides an overview of the private sector housing industry in Corona and its interrelationship with fair housing services.

Owner-Occupied Housing

Part of the American dream involves owning a home in a good neighborhood near schools, parks, shopping centers, jobs and other community amenities. Homeownership strengthens individual households and entire neighborhoods because owner-occupants have made an investment in their own personal property as well as the neighborhood and community. This fosters a greater sense of pride in the appearance and condition of not only the home but of the neighborhood as well. It also promotes owner involvement in the community because owner-occupants have a personal stake in the area and tend to be more active in decisions affecting the community. Fair housing opportunity laws protect an individual or family's right to occupy suitable housing in any location. Ensuring fair housing is an important way to not only preserve but to improve the housing opportunities for all residents in Corona.

Home Buying Process

Purchasing a home presents many challenges to the would-be owner. One of the main challenges in buying a home is the process by which an individual or family must acquire the property. The time required to find a home, the major legal and financial implications surrounding the process, the number of steps required and financial issues to be considered can be overwhelming to prospective buyers. Throughout this time-consuming and costly process, fair housing issues can surface in many ways. Discriminatory practices in the home buying process can occur through the:

- Advertisement of homes for sale;
- Lending process;
- Appraisal process;
- Actions of real estate agents and sellers; and
- The issuance of insurance.

Advertising

The first step in buying a home is generally searching for available housing through advertisements that appear in magazines, newspapers, or on the Internet. Advertising is a sensitive issue in the real estate and rental housing market because advertisements advertently or inadvertently can signal preferences for certain buyers or tenants. Recent

litigation has held publishers, newspapers, the Multiple Listing Service (MLS), real estate agents and brokers accountable for discriminatory ads.

Advertising can suggest a preferred buyer or tenant in several ways. Some examples include advertisements or listings that:

- Suggest a preferred type of buyer or tenant household;
- Use models that indicate a preference or exclusion of a type of resident;
- Publish advertisements or listings in certain languages; or
- Restrict publication to certain types of media or locations so as to indicate a preference.

As a rule of thumb, advertisements cannot include discriminatory references that describe current or potential residents, the neighbors or the neighborhood in racial or ethnic terms, or terms suggesting preferences for one group over another (e.g. adults preferred, ideal for married couples with kids, or conveniently located near Catholic church).

Lending

Initially, buyers must locate a lender that will qualify them for a loan. This part of the process entails an application, credit check, ability to repay, amount eligible for, choosing the type and terms of the loan, etc. Applicants are requested to provide sensitive information including their gender, ethnicity, income level, age, and familial status. This information is required to be gathered by the Community Reinvestment Act and the Home Mortgage Disclosure Act (HMDA); however, it does not guarantee that individual loan officers or underwriters will not misuse the information.

A report on mortgage lending discrimination by the Urban Land Institute describes four basic stages in which discrimination can occur:

- Advertising/outreach stage. Lenders may not have branches in certain locations, not advertise to certain segments of the population, or violate advertising rules with respect to fair housing.
- **Pre-application stage.** Lenders may not provide applicants of different racial and ethnic backgrounds the same types of information as other preferred groups, or may urge some to seek another lender.
- **Lending stage.** Lenders may treat equally qualified individuals in a different manner, giving different loan terms, preferred rates, or denying a loan based on a factor not related to ability to pay and risk.
- **Loan administration.** Lenders may treat minorities in harsher terms, such as initiating foreclosure proceedings if any payment is late, or by making loans at terms that encourage defaults.

Appraisals

Banks order appraisal reports to determine whether or not a property is worth the amount of the loan requested. Generally, appraisals are based on the comparable sales of properties surrounding the neighborhood of the subject property. Other factors such as the age of the structure, improvements made and location are also considered. Homes in some neighborhoods with higher concentrations of minorities and poverty concentrations may appraise lower than properties of similar size and quality in neighborhoods with lower concentrations of minorities or low-income households.

Taking these factors into consideration when valuing a property in an appraisal causes the arbitrary lowering of property values and restricts the amount of equity and capital available to not only the potential home buyer but also to the current owners in the neighborhood. Disparate treatment in appraisals is difficult to prove since individual appraisers have the latitude within the generally accepted appraisal practices to influence the outcome of the appraisal by factoring in subjective opinions.

Real Estate Agents Sellers

Finding a real estate agent is normally the next step in the home buying process. The agent will find the home for the prospective buyer that best fits their needs, desires, and budget based on the amount they are qualified for by the lender. Real estate agents may also intentionally or unintentionally discriminate by steering a potential buyer to particular neighborhoods, by encouraging the buyer to look into certain areas or failing to show the buyer all choices available. Agents may also discriminate in determining who they agree to represent, who they turn away and the comments they make about their clients.

Sellers

Even if a real estate agent is following fair housing practices, the current occupant (seller) may not want to sell his/her house to certain purchasers protected under fair housing laws or they may want to accept offers only from a preferred group. Oftentimes, sellers are home when agents show the properties to potential buyers and sellers may develop certain biases based upon this contact. The Residential Listing Agreement and Seller's Advisory forms that sellers must sign disclose their understanding of fair housing laws and practices of discrimination. However, preventing this type of discrimination is difficult because a seller may have multiple offers and choose one based on bias.

Insurance

Insurance agent underwriting guidelines which determine whether of not 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 to learn if certain companies have discriminatory policies, called redlining. Some stated require companies to file the underwriting guidelines with the State Department of Insurance, making the information public.

Home Loan Activity

A key aspect of fair housing choice is equal access to financing for the purchase or improvement of a home. In 1977, the Community Reinvestment Act (CRA) was enacted to improve access to credit for all communities, regardless of the race/ethnic or income makeup of its residents. CRA was intended to encourage financial institutions to help meet the credit needs of communities, including low-moderate income people and neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance.

In tandem with the Home Mortgage Disclosure Act (HMDA), financial institutions with assets exceeding \$10 million are required to submit detailed information on the disposition of home loans by applicant characteristics. HMDA data can then be evaluated with respect to lending patterns. This study uses a Chi-Square test to analyze loan approval rates. This statistical test can determine whether loan approval rates are significantly different for one group versus another, but cannot establish the presence of bona fide discrimination. Nonetheless, these statistical tests can certainly help provide direction on potential areas to focus further inquiry and study.

During 2017 calendar year, 10,949 households filed loan applications for housing in Corona. Of those applications, 1,556 were withdrawn before approval or denial and 678 were closed for incompleteness prior to a decision. Lending institutions rendered decisions on 8,715 loan applications. The data in **Table III-1** shows that the number of loan applications is highest for home refinancing loans, followed by home purchase and then home improvement. Loan approval ratings is highest for home purchase loans, followed by refinancing, and then home improvement. Conventional loans were most common for home purchases, home improvement, and for refinancing purposes. The average loan approval rate for all loan types was 82.97 percent.

Table III-1 Home Loan Application Activity in Corona

Туре	Number of Loan Applications	Share of Loan Applications	Number Approved	Approval Rate
Home Purchase	3,430	39.36%	3,120	90.96%
Conventional	2,671	30.65%	2,403	89.97%
FHA - Insured	506	5.81%	480	94.86%
VA - Guaranteed	253	2.90%	237	93.68%
FSA/RHS	0	0.00%	0	0.00%
Home Improvement	747	8.57%	543	72.69%
Conventional	674	7.73%	484	71.81%
FHA - Insured	41	0.47%	30	73.17%
VA - Guaranteed	32	0.37%	29	90.63%
FSA/RHS	0	0.00%	0	0.00%
Refinancing	4,538	52.07%	3,568	78.62%
Conventional	3,541	40.63%	2,808	79.30%
FHA - Insured	553	6.35%	425	76.85%
VA - Guaranteed	444	5.09%	335	75.45%
FSA/RHS	0	0.00%	0	0.00%
Total:	8,715	100.00%	7,231	82.97%

Source: 2017 Financial Institutions Examination Council – 2017 HMDA Database.

Mortgage Interest Rates & Fees

A key component to securing a home loan is the interest rate and fees associated with the loan. In 2018, Housing Policy Debate 1 published an article authored by Jacob William Fabor which looked at the "Racial Inequality in a Recovered Mortgage Market." Through their analysis, Fabor was able to isolate a discrepancy not only in loan acceptance rates between various races and ethnicities, but also in the interest rates given to those accepted loans. Fabor found that black applicants were more likely to be charged higher than rates than their white counterparts.

The author of this study used HDMA data from loans between the years of 2014 and 2018, and considered a number of variables, including: race, when the mortgage was originated, borrower's characteristics (specifically their race and gender), the type of loan issued, tract

¹ Fabor, Jacob William, "Segregation and the Geography of Creditworthiness: Racial Inequality in a Recovered Mortgage Market," *Housing Policy Debate*, Vol. 28 Issue 2, p. 215-247 (2018)

characteristics of applicants, residential segregation in the applicant's area, and the census region of the applicant.

According to the authors, the statistics they used suggested clear differences between non-white and white borrowers in almost every respect. Not only where the differences clear, but the difference in interest rates was substantial, "Black and Latino borrowers were approximately 3 times as likely to receive high-cost loans compared with Whites (and four times as likely as Asian borrowers)." This finding is even more significant as "Racial inequalities persisted even after controlling for borrower, loan, and ecological characteristics."

Importantly, the study found that spatial factors also influence the interest rates of minority applicants. In neighborhoods that were more heavily integrated, differences in interest rates were minimal. As explained by the author, "Racial gaps in the likelihood of receiving a high-cost loan were much smaller in integrated neighborhoods and metropolitan areas, but widened substantially as racial isolation increased."

Lending Outcomes

This section summarizes lending activity in Corona from 2017. HMDA data provides some insights regarding the lending patterns in a community. However, the HMDA data is only an indicator of potential problems; it cannot be used to conclude discrimination due to the limitations of the data.

Lending Outcomes by Income and Race/Ethnicity. Generally, home loan approval rates increase as household income increases. This was true for home purchase and home improvement loans (with the exception of the middle-income group for home purchase loans). Refinancing loans were the exception, with approval rates of 81.0 percent, 73.4 percent and 79.2 percent respectively. Low-income applicants had overall approval rates of 74.7 percent, while middle-income applicants had an overall approval rate of 75.5 percent. The best approval rates were for upper income home purchase loan applicants at 92.1 percent.

For home purchase, home improvement, and refinance loans regardless of income, the majority of applications were from Whites, which is in keeping with the overall population—the majority of Corona residents are Whites. The exception to this were low-income home purchase and refinance loans, in which Whites were second to individuals who declined to provide their race, or cases in which race was not applicable. Approval rates were highest for Whites, followed by those declining to state. African American applicants generally had the lowest approval ratings, being below the average acceptance rate in six of the nine categories (the exception being middle-income home purchase loans, and low-income home improvement and refinancing loans).

Table III-2 shows loan approval rates for home purchases, home improvement, and refinances by applicant characteristics.

Table III-2 Home Loan Approval Rates by Applicant Characteristics

Туре	Low/Mod	Low/Mod Income Midd			Upper Income			
	<80%]	MFI	80-120%	6 MFI	120+ N	MFI		
Race/	Loan	Approval	Loan	Approval	Loan	Approval		
Ethnicity	Applications	Rate	Applications	Rate	Applications	Rate		
Home Purchase	561	89.84%	521	87.14%	2348	92.08%		
Hispanic	60	66.67%	183	86.34%	591	92.39%		
White	69	73.91%	184	88.59%	974	92.30%		
Asian	30	83.33%	59	88.14%	335	91.94%		
African American	6	50.00%	28	89.29%	104	91.35%		
All Others	4	0.00%	16	81.25%	51	90.20%		
Decline or N/A	392	98.21%	51	84.31%	293	91.47%		
Home Improvement	107	53.27%	118	66.10%	522	78.16%		
Hispanic	44	45.45%	34	61.76%	118	75.42%		
White	25	44.00%	47	74.47%	236	84.32%		
Asian	5	60.00%	7	85.71%	48	83.33%		
African American	8	62.50%	8	62.50%	24	75.00%		
All Others	4	25.00%	2	50.00%	12	100.00%		
Decline or N/A	21	80.95%	20	50.00%	84	59.52%		
Home Refinance	931	80.99%	717	73.36%	2890	79.17%		
Hispanic	166	68.07%	246	73.17%	625	76.80%		
White	228	77.19%	249	76.31%	1285	81.71%		
Asian	42	52.38%	65	76.92%	270	78.52%		
African American	43	81.40%	27	51.85%	148	72.97%		
All Others	24	66.67%	16	56.25%	102	75.49%		
Decline or N/A	428	91.59%	114	72.81%	460	78.48%		

Source: 2017 Financial Institutions Examination Council - HMDA Database 2017.

Table III-2 provides a detailed breakdown of all residential loan applications filed during that calendar year into nine categories (by loan type – purchase, improvement, refinance; and by income level – less than 80 percent of AMI, 80-120 percent of AMI, and above 120 percent of AMI) and then further evaluating the loan approval rates within each category by the reported race/ethnicity of the applicant. The result of this evaluation was that there were 12 out of 54 possible instances where one racial or ethnic group had an approval rate that was disproportionately lower (10 percentage points or more) than the category being

evaluated. Those instances of disproportionately lower approval rates for a racial or ethnic group included:

- Seven instances of disproportionately lower approval rates for groups earning less than 80 percent of AMI
 - o Home Purchase approval rate: 89.84 percent
 - Hispanic: 66.67 percent
 - White: 73.91 percent
 - African American: 50.00 percent
 - o Home Improvement approval rate: 53.27 percent
 - All Others: 25 percent
 - o Home Refinance approval rate: 80.99 percent
 - Hispanic: 68.07 percent
 - Asian: 52.38 percent
 - All Others: 66.67 percent
- Four instances of disproportionately lower approval rates for groups earning between 80 and 120 percent of AMI:
 - o Home Improvement approval rate: 66.10 percent
 - All Others: 50.00 percent
 - Decline or N/A: 50.00 percent
 - o Home Refinance approval rate: 73.36 percent
 - African American: 51.85 percent
 - All Others: 56.25 percent
- One instance of a disproportionately lower approval rate for one group earning over 120 percent of AMI:
 - o Home Improvement approval rate: 78.16 percent
 - Decline or N/A: 59.52 percent

Differences in approval rates for home loan applications among minorities do not necessarily reflect discriminatory practices. Differences could be due to credit scores, employment history, knowledge of the lending process, debt-income ratio, or other factors. Nonetheless, the persistence of lower loan approval rates among minorities continues to be an issue that merits evaluation in this housing market area.

Lending Outcomes by Tract Characteristics. The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low- and moderate-income neighborhoods. Analyzing lending patterns by neighborhood characteristics can show whether significantly fewer home loans are being approved or issued in low/moderate income neighborhoods or neighborhoods with a disproportionately high percentage of minority residents. The lack of lending activity in one or more neighborhoods has been linked to unequal access to credit among different race and ethnic groups and alleged practices of redlining and discrimination.

Table III-3 shows a comparison of home purchase and refinance loan approval rates at the census tract level by the minority concentration in the tract as well as tract income level

relative to the Area Median Income. Corona is a multi-cultural community with neighborhoods that reflect the City's demographics.

Table III-3
Home Loan Approval Rates by Tract Characteristics

	Home	Purchase Lo	ans	Home Refinance Loans				
Tract Characteristics	Number of Applications			Number of Applications	Number Approved	Percent Approved		
Minority Percentage								
20% to 50%	906	832	91.83%	1,271	1,014	79.78%		
50% to 80%	2440	2214	90.74%	3,184	2,495	78.36%		
80% +	84	74	88.10%	83	59	71.08%		
Tract Income								
Low	174	152	87.36%	179	131	73.18%		
Middle	894	804	89.93%	921	724	78.61%		
Upper	2362	2164	91.62%	3438	2713	78.91%		

Source: HMDA data, 2017.

Predatory Lending

Predatory lending involves abusive loan practices usually targeting minority homeowners or those with less-than-perfect credit histories. Examples of predatory lending practices include high fees, hidden costs, unnecessary insurance, and larger repayments due in later years. A common predatory practice is directing borrowers into more expensive and higher fee loans in the "subprime" market, even though they may be eligible for a loan in the "prime" market. Predatory lending is prohibited by a number of state and federal laws.

The Fair Housing Act of 1968 prohibits discrimination in the making or purchasing of loans, or in providing of other financial assistance, or the terms and conditions of such financial assistance for the purpose of purchasing, constructing, improving, repairing, or maintaining a dwelling because of race, religion, color, national origin, sex, family status, or disability. The Equal Credit Opportunity Act of 1972 also requires equal treatment in loan terms and availability of credit for all of the above categories, as well as age and marital status. Lenders would be in violation of these acts, if they target minority or elderly households to buy higher-priced loan products, treat loans for protected classes differently, or have policies or practices that have a disproportionate effect on the protected classes.

In addition, the Truth in Lending Act (TILA) requires lenders to inform the borrower about payment schedules, loan payments, prepayment penalties, and the total cost of credit. In 1994, Congress amended TILA and adopted the Home Ownership and Equity Protection Act (HOEPA). HOEPA requires that lenders offering high-cost mortgage loans disclose information if the annual percentage rate (APR) is ten points above the prime rate or if fees are above eight percent of the loan amount. HOEPA also prohibits balloon payments for short-term loans and, for longer covered loans, requires a warning if the lender has a lien on

the borrower's home and the borrower could lose the home if they default on the loan payment.

Following North Carolina's lead, in September 2001, California became the second state to pass a law banning predatory lending. Codified as AB489 and amended by AB344, the law enables state regulators and the Attorney General to attempt to prevent "predatory" lending practices by authorizing the state to enforce and levy penalties against licensees that do not comply with the provisions of this bill. The law provides protections against predatory lending to consumers across the state with respect to financing of credit insurance, high loan and points, steering and flipping, balloon payments, prepayment penalties, call provisions, interest rate changes upon default, or encouragement to default when a conflict of interest exists.

Foreclosures

Foreclosure occurs when homeowners fall behind on one or more scheduled mortgage payments. The foreclosure process can be halted if the homeowner is able to bring their mortgage payments current or if the homeowner sells their home and pays the mortgage off. However, if regular payments cannot be resumed or the debt cannot be resolved, the lender can legally use the foreclosure process to repossess (take over) the home. When this happens, the homeowner must move out of the property. If the home is worth less than the total amount owed on the mortgage loan, a deficiency judgment could be pursued. If that happens, the homeowner would lose their home and also would owe the home lender an additional amount.

In the late-2000s the number of foreclosed homes in California hit an all-time high. The problem was so severe in its consequences that numerous factors have been attributed for the high incidence of foreclosure, including but not limited to abnormally high housing prices in the early part of the decade, the origination of sub-prime loans to unqualified buyers, the economic recession and job losses. This confluence of negative economic incidents left most housing markets in the United States in severe decline with historically high rates of foreclosure. Property values declined significantly—in some cases to pre-2000 levels.

Southern California and Riverside County, in particular, were characterized by a high percentage of foreclosed homes as many homeowners were unable to keep up with payments. The high foreclosure rate prompted Congress to create the Neighborhood Stabilization Program (NSP), which is administered by the U.S. Department of Housing and Urban Development (HUD) to purchase abandoned and foreclosed properties in an effort to stabilize local housing markets that have been targeted for their high risk of foreclosure. The NSP provided grants to every state and certain local communities to purchase foreclosed or abandoned homes and to rehabilitate, resell, or redevelop these homes in order to stabilize neighborhoods and stem the decline of house values of neighboring homes. The program was authorized under Title III of the Housing and Economic Recovery Act of 2008.

The high incidence of foreclosure and the housing crisis in general represented a systemwide collapse of the housing market that resulted in numerous national, state and local efforts to reform virtually every aspect of housing acquisition and finance. Several years have now passed since the foreclosure crisis began, and the housing market is beginning to rebound thanks in part to those efforts. ATTOM Data Solutions recently announced its Fiscal Year 2018, 3rd Quarter numbers, which show that foreclosure filings are down 6 percent from the previous quarter, down 8 percent from the third quarter last year, and were at their lowest levels since the fourth quarter of Fiscal Year 2005.2 Not only are foreclosure filings down for the last quarter, foreclosure filings have been below the prerecession average for eight consecutive quarters. However, that same report indicates that there is still a relatively modest, but widespread, foreclosure risk associated with FHA loans originated in 2014 and 2015, exceeding the long-term average foreclosure rates for all FHA loans. Overall, the housing market seems to have recovered from the recent crisis.

Agency Coordination

Many agencies are involved in overseeing real estate industry practices and the practices of the agents involved. A portion of this oversight involves ensuring that fair housing laws are understood and complied with. The following organizations have limited oversight within the real estate market, and some of their policies, practices, and programs are described.

National Association of Realtors (NAR). The National Association of Realtors (NAR) is a consortium of realtors which represent the real estate industry at the local, state, and national level. Locally, the Inland Gateway Association of Realtors (TIGAR) is the main association that serves the Corona area. As a trade association, members receive a range of membership benefits. However, in order to become a member, NAR members must subscribe to its Code of Ethics and a Model Affirmative Fair Housing Marketing Plan developed by HUD. The term Realtor thus identifies a licensed real estate professional who pledges to conduct business in keeping with the spirit and letter of the Code of Ethics.

Realtors subscribe the NAR's Code of Ethics, which imposes obligations upon Realtors regarding their active support for equal housing opportunity. 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." 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."

The NAR has created a diversity certification, "At Home with Diversity: One America" to be granted to licensed real estate professionals who meet eligibility requirements and complete the NAR "At Home with Diversity" course. The certification signals to customers that the real estate professional has been trained on working with the diversity of today's real estate markets. The coursework provides valuable business planning tools to assist real estate

² https://www.attomdata.com/news/market-trends/foreclosures/foreclosure-market-report-q3-2018/ retrieved October 19, 2018.

professionals in reaching out and marketing to a diverse housing market. The NAR course focuses on diversity awareness, building cross-cultural skills, and developing a business diversity plan. In July 1999, the NAR Diversity Program received the HUD "Best Practices" award.

California Association of Realtors (CAR). The California Association of Realtors (CAR) is a trade association that includes more than 117 local member Associations and more than 175,000 Realtors, Realtor-associates and affiliate members statewide. As members of CAR, Realtors subscribe to a strict code of ethics. CAR has recently created the position of Equal Opportunity/Cultural Diversity Coordinator. CAR holds three meetings per year for its general membership, and meetings typically include sessions on fair housing issues. They also maintain fair housing and ethics information on their website. The website address is as follows: http://www.dre.ca.gov/. The licensure status of individual agents can be reviewed at the following site: http://www.dre.ca.gov/licensees sub.htm. This web site includes any complaints or disciplinary action against the agent.

Realtor Associations Serving Corona. 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 where the broker is located. Complaints involving agents or brokers may be filed with these associations. Monitoring of services by these associations is difficult as detailed statistics of the education/services these agencies provide or statistical information pertaining to the members is rarely available. TIGAR serves the Corona area.

California Department of Real Estate (DRE). The California Department of Real Estate (DRE) is the licensing authority for real estate brokers and salespersons. 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 the four mandated areas: Agency, Ethics, Trust Fund, and Fair Housing. The fair housing course contains information that enables an agent to identify and avoid discriminatory practices when providing real estate services.

DRE investigates written complaints received from the public alleging possible violations of the Real Estate Law or the Subdivided Lands Law by licensees or subdividers. DRE also monitors real estate licensees conducting business as mortgage lenders and mortgage brokers. If an inquiry substantiates a violation, DRE may suspend or revoke a license, issue a restricted license, or file an Order to Desist and Refrain. Violations may result in civil injunctions, criminal prosecutions, or substantial fines. The Department publishes monthly a list of names of persons and businesses which have been conducting real estate activities without a license.

DRE reviews Covenants, Conditions, and Restrictions (CC&R's) for all subdivisions of five or more lots, or condominiums of five or more units. The review includes a wide range of issues, including compliance with fair housing law. CC&R's are restrictive covenants that involve voluntary agreements, which run with the land they are associated with. In the past, CC&R's were used to exclude minorities from equal access to housing. DRE reviews CC&R's and they

must be approved before issuing a final subdivision public report. This report is required before a real estate broker or anyone can sell the units, and each prospective buyer must be issued a copy of the report.

The California Organized Investment Network (COIN). 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 providing profitable returns to investors and economic/social benefits to underserved communities.

Rental Housing

Similar to the owner-occupied market, a major challenge to ensuring fair housing in the rental market is the complexity of the process. Stages in the process of renting a home include advertising, pre-application inquiries, viewing the apartment, criteria for qualifying for the lease, lease conditions, and administration of the lease. The process becomes even more difficult and subjective in a tight rental market, where the landlord has numerous options for choosing the future tenant based on subjective factors.

The Rental Process

While the process of renting an apartment or home may be less expensive and burdensome up front than the home-buying process, it may still be just as time-consuming and potential renters may still face discrimination during various stages of the rental process. Some of the more notable ways in which tenants may face discriminatory treatment are highlighted below.

Advertising

The main sources of information on rentals are newspaper advertisements, word of mouth, signs, apartment guides, the Internet, and apartment brokers. Recent litigation has held publishers, newspapers, and others accountable for discriminatory ads. Advertising can suggest a preferred tenant by suggesting preferred residents, using models, publishing in certain languages, or restricting media or locations for advertising. Advertisements cannot include discriminatory references that describe current or potential residents, the neighbors or the neighborhood in racial or ethnic terms, or other terms suggesting preferences (e.g., adults preferred, ideal for married couples with kids, or conveniently located near a Catholic church).

Discriminatory advertising can be one of the most insidious forms of discrimination based on its widespread dissemination. Marketing is typically broad-based, reaching many people, and as such, can have a chilling effect on the market. This is also particularly true when the discrimination is unintentional or subconscious. Landlords who may never discriminate

knowingly against a minority applicant may not be contacted by minority potential renters due to unconscious signaling in the advertisements. This is why, even though there are exceptions in the Fair Housing Act for when it applies, there is no similar exception when it comes to the advertising rules.

Viewing the Unit

Viewing the unit is the most obvious, or overt, place where potential renters may encounter discrimination because landlords or managers may discriminate based on race or disability, judge on appearance whether a potential renter is reliable or may violate any rules, or make any other subjective judgments. For example, if a student is wearing a T-shirt with a rap artist on the front, a landlord may suspect that the renter could play loud music disturbing to other tenants. If a prospective tenant arrives with many children, the landlord may be concerned that the children may disturb other renters. In addition, the prospective tenant may also have an accent or wear religious symbols or jewelry which may again play into the decision to rent the unit. The opportunity for the potential renter to view the unit, is also an opportunity for the landlord to view the potential tenant and make value judgments based on their appearance or personal characteristics.

Qualifying for the Lease

Landlords may ask potential renters to provide credit references, lists of previous addresses and landlords, and employment history and salary. The criteria for tenant selection, if any, are typically not known to those seeking to rent a home. An initial payment consisting of first and last months' rent and security deposit are typically required. To deter "less-than-desirable" tenants, a landlord may ask for an initial payment or security deposit higher than for others. Tenants may also face differential treatment when vacating the unit. The landlord may choose to return a smaller portion of the security deposit to some tenants, claiming excessive wear and tear.

Because the rental market is getting tighter, with more applicants for every available unit than ever before, landlords who wish to do so have more cover when discriminating when choosing whom to rent to. Because there are more applicants, there are more qualified applicants, and the potential for discrimination arises when the landlord has to decide between multiple qualified candidates of different demographics.

The Lease

Most apartments are rented under either a lease agreement or a month-to-month rental agreement, both of which have advantages and disadvantages for both landlords and tenants. Some tenants see a lease as more favorable 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. However, some tenants prefer the flexibility that a month-to-month tenancy provides. The lease agreement usually includes the rental rate, required deposit, length of occupancy, apartment rules, and termination requirements, and there are rights and responsibilities on both sides of the contract. Typically, the rental agreement is a

standard form for all units in the same building. However, enforcement of rules contained in the lease agreement may not be standard. A landlord may choose to strictly enforce rules for certain tenants based on their race/ethnicity, children, or a disability – raising fair housing concerns.

Rental Housing Services

The City of Corona has contracted with the Fair Housing Council of Riverside County (FHCRC) to provide fair housing and related services.

During the five-year period preceding this writing, FHCRC assisted rental housing residents in the City of Corona with the resolution of a wide variety of landlord/tenant issues. **Table III-4** includes a five-year tabulation of landlord-tenant related inquiries received by FHCRC. Any resident in FHCRC's service area can utilize their services and expertise to navigate the complex laws facing landlords, managers and tenants in the rental housing market. It is common for landlords, managers and tenants to take inappropriate actions against other parties due to lack of knowledge about laws affecting tenancy in rental housing. Oftentimes, such disputes are resolved merely through education, and do not require the parties to file a lawsuit, or file formal complaints with the City, to enforce their rights.

Table III-4 Landlord-Tenant Complaints

Inquiry Category	2013- 2014	2014- 2015	2015- 2016	2016- 2017	2017- 2018	Total
Eviction	136	102	102	182	109	631
Occupancy Standards	18	8	10	7	4	47
Repairs	279	289	259	368	388	1,583
Deposits	150	135	104	159	135	683
Entering / Harassment	88	113	30	49	39	319
Late Fees	16	6	10	5	2	39
Lead	0	0	0	0	0	0
Lease/Rental Terms	336	242	288	129	284	1,279
Mobile Homes	21	32	32	32	17	134
Mold	41	27	54	73	20	215
Rental Assistance	21	10	1	3	12	47
Rent Increase	23	42	83	83	63	294
Homeless Assistance Referrals	2	2	5	3	14	26
Habitability	64	90	42	16	51	263
Notices	201	357	328	308	328	1,522
Section 8 Issues	10	8	10	12	8	48
Other	195	165	141	266	282	1,049
Affordable Housing	25	42	24	32	6	129
Foreclosure Issue	29	4	0	6	0	39
Total:	1,655	1,674	1,523	1,733	1,762	8,347

Source: FHCRC Annual Reports, 2013-2018.

Based on the information presented in Table III-4, the most prevalent landlord-tenant disputes in Corona over the last five years were repairs, notices, and lease/rental terms.

Agency Coordination

Many agencies oversee the apartment rental process and related practices. This oversight includes ensuring that fair housing laws are understood and complied with. The following organizations have limited oversight within the rental housing market, and some of their policies are described.

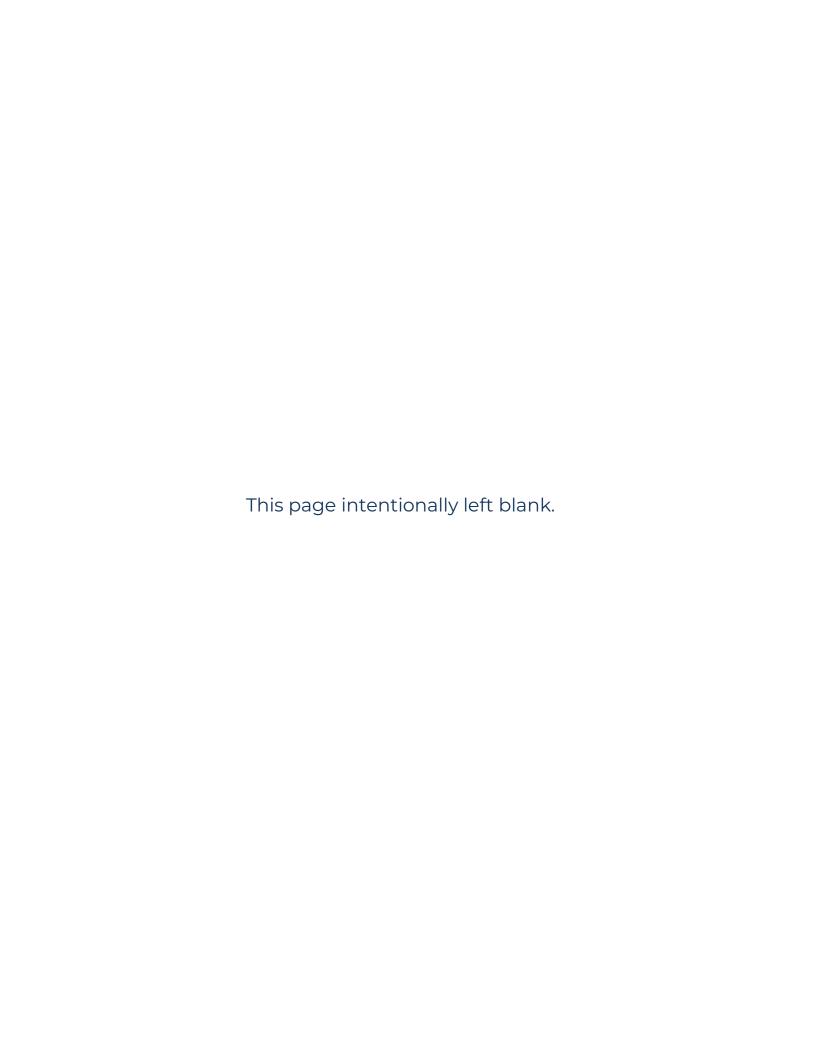
California Apartment Association (CAA)

CAA is the country's largest statewide trade association for rental property owners and managers. Incorporated in 1941 to serve rental property owners and managers throughout California, CAA represents rental housing owners and professionals who manage more than 1.5 million rental units. CAA has developed the California Certified Residential Manager (CCRM) program to provide a comprehensive series of courses geared towards improving the approach, attitude and professional skills of on-site property managers and other

interested individuals. The CCRM program consists of 31.5 hours of training that includes fair housing and ethics along with other courses.

National Association of Residential Property Managers (NARPM)

NARPM promotes standards of business ethics, professionalism, and fair housing practices in the residential property management field. NARPM is an association of real estate professionals experienced in managing single-family and small residential properties. The North Los Angeles Chapter covers Corona. In addition, NARPM certifies its members in the standards and practices of the residential property management industry and promotes continuing professional education. NARPM offers 3 professional designations: Residential Management Professional, RMP®, Master Property Manager, MPM®, and Certified Residential Management Company, CRMC®. These certifications require educational courses in fair housing.



Analysis of Public Policy Impediments

Land Use Policy

General Plan

Land use policies are fundamental to ensuring housing opportunities. Any land use policies that do not promote a variety of housing opportunities can impede housing choice especially for low- and moderate-income persons and households. These policies are outlined in the General Plan, which determines the type, amount, location and density of land uses within the City in a manner prescribed by the State Planning Law. Approximately half of the City's available land is designated for residential use. The General Plan provides for the following residential land use designations:

- **Rural/Estate Residential:** These designations accommodate large lot residential development to maintain the area's low density, rural/estate and natural character. Estate Residential accommodates moderate to large size lots for single family detached housing units.
- Low/Low Medium Density Residential: These designations accommodate detached single-family homes and are characterized by lots up to 7,200 square feet. Low Medium Density Residential accommodates detached single-family houses on small lots up to 7,200 square feet or in condominium ownership. Although more dense than the "Residential Low" category, these areas retain the basic amenities and qualities of a single-family neighborhood including front and rear yards, driveways, and garages.
- Medium Density Residential: This designation accommodates attached housing types, such as townhomes and duplexes and single-family detached housing in a condominium form of development, with a smaller average lot area per dwelling to facilitate the clustering of units in planned developments to provide expanded recreational amenities and preserve open spaces and topography.
- **High Density Residential:** This designation accommodates multi-family residential development, such as garden apartments and condominium. On larger parcels within this designation, common open space areas, landscaping, and other site amenities are typically provided.
- Urban Density Residential: This designation accommodates high density residential development primarily through innovative infill design in the city's opportunity districts and sites.
- Mixed Use I and Downtown Commercial: These designations accommodate
 the development of properties exclusively for retail commercial and office uses
 or an integrated mix of commercial and residential uses along arterial streets or

at primary community activity centers and transit station. Residential uses may be integrated into the upper floors of structures developed for retail or office uses on the lower floors or horizontally on the same site.

Table IV-1 shows each of the General Plan Land Use Designations and their respective acreages within the community. Medium and High Residential density uses are distributed throughout the City to provide for the development of a range of housing opportunities in different neighborhoods.

Table IV-1
General Plan Land Use Designations

Land Use Designation	Description	Area (in acres)	% of Total
Residential	Single-family and mobile home parks	9,380	38.0
Multi-Family	Multi-family and condominium	556	2.2
Commercial	Highway/Regional commercial; Commercial Professional, Neighborhood Commercial	1,104	4.5
Mixed Use	Commercial/Industrial & Residential; Downtown Commercial/Mixed Use	1,895	7.7
Industrial	Manufacturing; Industrial/Artist Lost	3,272	13.3
Other	Public Facility; Institutional; Park/Open Space; Agricultural; Right-of-Way/Roads; Passive Open Space; Flood Control; Other/Vacant	8,459	34.3
	Total:	24,666*	100.0%

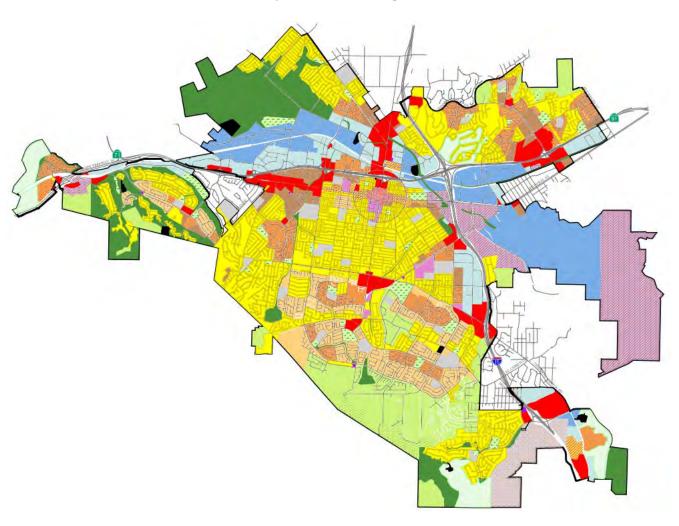
Source: City of Corona General Plan, 2004.

(http://giscityofcorona.opendata.arcgis.com/datasets/bbdbdf0b83504d799d30147f158 4f747_9).

Map IV-1 illustrates the City's land use designations. **Map IV-1A** shows the proposed land use designations for Spheres of Influence areas, which include Coronita on the west boundary of the City, Home Gardens and El Cerrito on the east, and the significant Temescal Canyon region to the southeast. Although areas such as El Cerrito and Temescal Canyon have large swaths deemed rich in Mineral Resources, and others designated as Open Space Rural areas and Conservation and Conservation Habitat areas, they are slated to contain zoning districts from Very Low Density Residential to High Density Residential, with large regions designated as Rural Community Areas. In addition, these regions are slated to contain Light Industrial and Heavy Industrial, Community Center, Business Park, Commercial Tourist, and Commercial Retail designations.

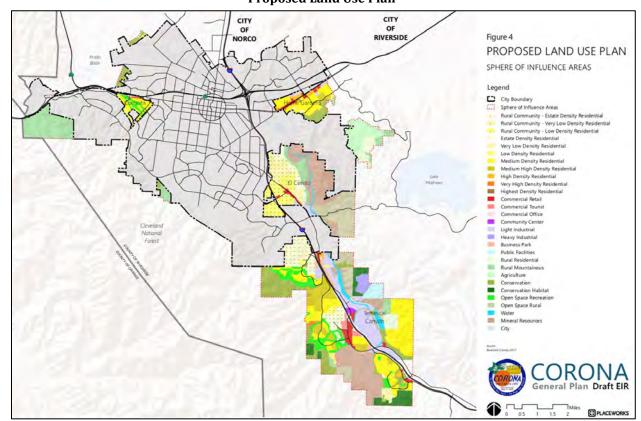
^{*}Note: The existing land use acreage were calculated for the baseline year of 2002. Since then, the City has annexed additional land from the West Sphere of the SOI. As such, the acreage under the General Plan is lower than under the existing land uses. As of 2017, the City is 25,151.73 acres according to City GIS

Map IV-1 Citywide Land Use Map





Source: City of Corona General Plan, 2004.



Map IV-1A
Proposed Land Use Plan

Source: Corona General Plan, Draft EIR, 2017; attached to Notice of Preparation and Scoping Meeting, City of Corona, dated August 14, 2018.

Zoning Ordinance

Chapter 17 of the Corona Municipal Code sets forth the requirements of the City's Planning and Zoning Ordinance. According to the Zoning Ordinance, the provisions of this title are not intended to interfere with, abrogate or annul any easements, covenants or other agreements existing as of April 21, 1966, the original effective date of the ordinance codified in this title. The Zoning Ordinance contains the following zone districts with residential areas:

- A and A-14.4 (Agricultural): This zone district is intended for general agricultural purposes, with appropriate single-family residences and customary accessory buildings.
- **R-1A to R-20 (Single-Family Residential)**: These zone districts are intended for the development of single-family homes.
- **MP (Mobile Home Park Zone)**: This zone district is intended to provide for a combination of mobile homes in planned, integrated mobile home parks

according to standards consistent with the protection of the health, safety, and welfare of the City.

- **R-2 to R-3 (Multiple-Family Residential)**: These zone districts are intended as a residential district for single-family dwellings, duplexes and multiple-family residences.
- **R-3-C and R-G (Multiple Dwelling)**: The R-3-C zone district is intended to encourage replacement and alteration of the older substandard and deteriorated buildings by providing incentives for land assemblage and a greater number of dwelling units per lot area than is allowed in other multiple-residential zones of the City (R-2, R-3, and R-G). The R-G zone district is intended exclusively for multiple dwellings, including apartments and duplexes, which are located along landscaped major streets, as indicated on the City's General Plan.

In addition to implementing and regulating the General Plan residential land use designations through the creation of various residential zone districts, the City of Corona has 31 Specific Plan areas. Some Specific Plans incorporate provisions for housing. These Specific Plan areas include:

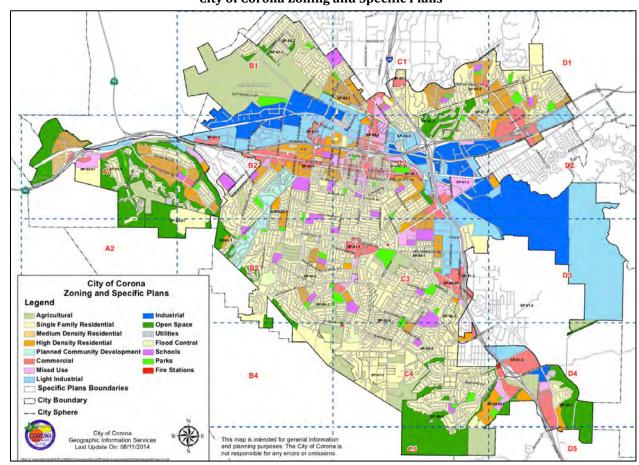
- Lincoln Business Center Specific Plan SP81-1
- Northeast Corona Specific Plan SP81-2
- Township In Corona Specific Plan SP82-1
- Birtcher Business Center Specific Plan SP82-2
- Crown Properties Specific Plan SP83-1
- Concordia Specific Plan SP84-1
- Parkview Specific Plan SP84-2
- Brookwood GDPA 85-1
- Prado Point Specific Plan SP85-1
- Sierra Del Oro Specific Plan SP85-2
- Corona Ranch Specific Plan SP85-3
- Westgate Specific Plan SP87-1
- Mountain Gate Specific Plan SP89-1
- Chase Ranch Specific Plan SP89-2
- Plaza on Sixth Street Specific Plan SP90-1
- Todd Ranch Specific Plan SP90-2
- Cherokee Ranch Specific Plan SP90-3
- Empire Homes Specific Plan SP90-4
- Corona Vista Specific Plan SP90-5
- Eagle Glen Specific Plan 90-6
- Main Street South Plaza Specific Plan SP91-01
- El Cerrito Specific Plan SP91-2
- The Cimarron Specific Plan SP95-01
- Downtown Corona Revitalization Specific Plan SP98-01
- North Main Street Specific Plan SP99-01

- Dos Lagos Specific Plan SP99-03
- Green River Ranch Specific Plan SP00-001
- Crown Ranch Estates Specific Plan SP01-001
- Corona Magnolia Specific Plan SP01-002
- Sierra Bella Specific Plan SP04-001
- Arantine Hills Specific Plan SP09-001

Specific Plans accomplish many important functions. Primarily, Specific Plans regulate land use and development within a specific project boundary, creating a master plan for an area. In most instances, these plans supersede the original zoning of the land unless otherwise specified.

Specific Plans also serve to minimize the intrusion of new development in environmentally sensitive areas and to ensure the timely provision of essential public services and facilities consistent with the demand for such services. Specific Plans facilitate quality development within the City by permitting flexibility and by encouraging more creative and aesthetically pleasing designs for major urban development projects subject to large-scale community planning. Additionally, Specific Plans promote a harmonious variety of housing choices and commercial and industrial land uses. Planners strive to attain a desirable balance of residential and employment opportunities as well as a high level of urban amenities, all while preserving natural and scenic qualities of open space.

Map IV-2 illustrates the regions of the city of Corona encompassed by particular zoning districts and impacted by specific plans. Enlarged versions of each map quadrant, with detailed plotting of specific plan coverage areas can be viewed at: https://www.coronaca.gov/home/showdocument?id=218.



Map IV-2
City of Corona Zoning and Specific Plans

Source: City of Corona Geographic Information Services, Last Update On: 08/11/2014.

Housing Element

The Housing Element is one (1) of eleven (11) mandated elements of Corona's General Plan. The State of California housing element law, enacted in 1969 and recently amended in 2008 by Senate Bill 2, requires that local governments adequately plan to meet the existing and projected housing needs of all economic segments of their community. The stated focus of the Corona 2013-21 Housing Element is to specifically identify ways in which the housing needs of existing and future residents can be met.

The Housing Element's primary goals are to conserve and improve the existing stock of affordable housing; provide adequate sites to achieve a variety and diversity of housing; assist in the development of affordable housing; remove governmental constraints as necessary; and promote equal housing opportunity.

All the cities in Riverside County have been allocated certain housing growth objectives that will enable the region to meet its projected housing needs in the coming years. The Southern California Association of Governments (SCAG) has been delegated with the responsibility in developing regional growth forecasts and then assigning new housing

objectives for each city and county under SCAG's jurisdiction. In addition to establishing an overall objective for new housing units for the defined planning period (2013-2021), the SCAG Regional Housing Needs Assessment (RHNA) also indicated the proportion of future housing units that should be accessible to households with varying incomes. The RHNA that is applicable to Corona is summarized below:

- A total of 192 units should be allocated to very low-income households (less than 50 percent of the Riverside County median income);
- A total of 128 units should be provided for low-income (50 percent 80 percent of the median income) households;
- A total of 142 units should be provided for moderate-income (80 percent 120 percent of the median income) households; and
- A total of 308 units should be provided for households with above-moderate (more than 120 percent of the median income) for the county incomes.
- The total number of new housing units that will need to be added to the City's housing inventory during the 2013-2021 planning period is 770 units.

The Housing Element also describes various housing programs intended to facilitate meeting the objectives described above. Where relevant to this Analysis of Impediments, housing programs that affect Fair Housing are described in this report. As indicated in the April 2014 report from the State Department of Housing and Community Development (HCD), the 2013-21 Housing Element was reviewed on December 12, 2013 and is in compliance with State Law.

Housing Opportunities

Housing Element law requires that cities facilitate and encourage the provision of a range in types and prices of housing for all economic and special needs groups. Local government policies that limit or exclude housing for persons with disabilities, lower income people, people who are homeless, families with children, or other groups may violate the Fair Housing Act. Cities must take these factors into account when regulating land use and development standards in residential zones. **Table IV-2** describes permitted residential uses.

Table IV-2
Single-Family Housing Opportunities Permitted by Zone

	Zone District									
Housing Opportunities	A A- 14.4	R-1-A R-1- 20.0 R-14.4 R-1- 12.0 R-1-9.6 R-1-8.4 R-1-7.2	MP	R-G	R-2 R-3 R-3-C	C-2 CP	C-3	M-1	M-2 M-3	
Single-family	P	P	X	X	P	X	X	X	X	
Multi-family	X	X	X	С	P	X	X	X	X	
Second Units	P	Р	P	X	P	X	X	X	X	
Manufactured Housing	P	P	Р	X	P	X	X	X	X	
Care Facility for 6 or Less	Р	Р	X	Р	Р	X	X	X	X	
Care Facility for 7 or More	С	С	X	С	С	X	X	X	X	
Emergency Shelters	X	X	X	X	X	X	X	P	BZA	
Farmworker Housing	P	X	X	X	X	X	X	X	X	
P=Permitted; C=Condition	nally Pe	rmitted; X	=Not	Permitte	ed; BZA=	Board of	Zoning A	Approval		

Sources: City of Corona Zoning Ordinance, 2015.

Single Family

Single-family residences are a principally permitted use in all residential zones. Single-family residential describes each residential dwelling unit in a development that has a density of eight units to the gross acre or fewer.

Multi-Family

Multi-family developments are permitted in the R-2, R-3, and R-3-C zones. They are also permitted with a conditional use permit in the R-G zone. The maximum densities are 12 dwelling units per acre in the R-2 and R-G zones; 36 dwelling units per acre (or up to 75 senior citizen units per acre with CUP) in the R-3 zone; and 23 dwelling units per acre (for lots less than 22,500 square feet), 29 dwelling units per acre (for lots equal to or greater than 22,500 square feet), or 58 dwelling units per acre (for lots previously burdened by or adjacent to a public street easement) in the R-3-C zone.

Condominium

Condominiums are estates in real property consisting of an undivided interest in common with other similar estate(s) in a portion of a parcel of real property, together with a separate interest in space in a residential, industrial, or commercial building on such real property, such as an apartment, office or store. A condominium may additionally include a separate interest in other portions of such real property.

Manufactured Housing

Manufactured housing is a residential building or dwelling unit which is either wholly manufactured or is in substantial part manufactured at an off-site manufacturing facility for installation or assembly at the building site, bearing a label that is constructed in compliance with the National Manufactured Home Construction and Safety Standards.

State law requires cities to permit manufactured housing and mobile homes on lots for single-family dwellings provided that the manufactured home meets the location and design criteria established in the Zoning Ordinance.1 The City's Zoning Ordinance meets this requirement.

Mobile Home Parks

State law requires that jurisdictions accommodate a mobile home park within their community; however, a city, county, or a city and county may require a use permit. A mobile home park refers to a mobile home development built according to the requirements of the Health and Safety Code, and intended for use and sale as a mobile home condominium, cooperative park, or mobile home planned unit development.2 In compliance with State law, the City permits mobile homes parks and mobile home subdivisions within the Mobile Home Park zone. There are 13 mobile home parks in the City of Corona, including:

- Corona La Linda Mobile Home Park (777 S. Temescal St, Corona, CA 92879)
- Green River Village (4901 Green River Rd, Corona, CA 92880)
- Corona Palms Mobile Home Park (13381 Magnolia, Corona, CA 92879)
- Villa Corona Mobile Home Community (1550 Rimpau Ave, Corona, CA 92881)
- Countrywood Estates (307 S. Smith Ave, Corona, CA 92882)
- Creekside Mobile Estates (21650 Temescal Canyon Rd, Corona, CA 92883)
- Rancho Corona Mobilehome Park (1225 W. 8th St, Corona, CA 92882)
- Village Grove Mobile Home (1001 Roseglen Way, Corona, CA 92882)
- Corona West Mobile Home Estate (995 Pomona Rd, Suite 2, Corona, CA 92882)
- Flamingo Mobile Lodge (1203 W. 6th St, Corona, CA 92882)
- Amberlite Mobile Home Estates (853 N. Main St, Corona, CA 92880)

¹California Government Code, § 65852.3

²California Government Code § 65852.7

- La Corona Mobile Home Park (1410 E. 6th St #36, Corona, CA 92879)
- Park Lane Mobile Home Estates (3900 S. Temescal St, Corona, CA 92879)

Accessory Units

Enacted in 2002, AB1866 requires cities to use a ministerial process to consider and approve accessory units proposed in residential zones.3 According to HCD, a local government must "...accept the application and approve or disapprove the application ministerial without any discretionary review..." For an application to be ministerial, the process must apply predictable, objective, fixed, quantifiable, and clear standards. These standards must be administratively applied to the application and not otherwise be subject to discretionary decision-making by a legislative body. Historically, the City allows accessory units in all residential zones.

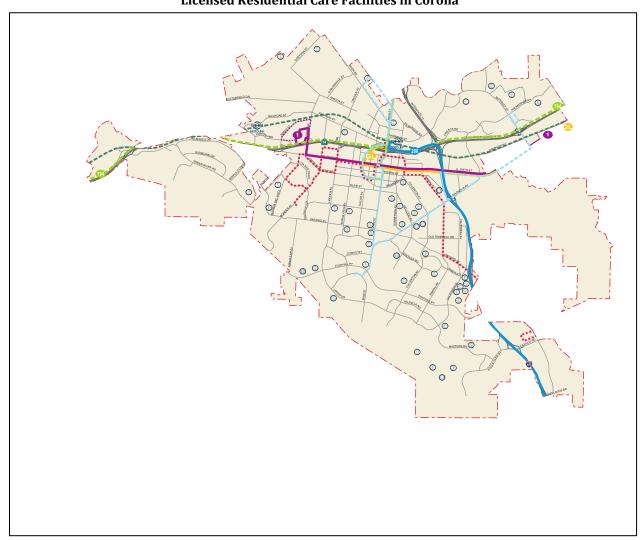
Residential Care Facilities

The Lanterman Developmental Disabilities Services Act declares that mentally, physically, and developmentally disabled persons, children and adults who require supervised care are entitled to live in normal residential settings. State law requires that licensed residential care facilities serving six or fewer persons be treated as a residential use under zoning, be allowed by right in all residential zones, and not be subject to more stringent development standards, fees, taxes, and permit procedures than required of the same type of housing (e.g., single-family homes) in the same zone.4 The City revised its Zoning Ordinance in July 2013 to allow all such facilities by right wherever single- or multi-family housing is allowed.

Map IV-3 illustrates the distribution of such facilities throughout the City of Corona. **Table IV-3** lists 73 licensed residential care facilities that provide accommodations to over 1,180 residents. Ten of the facilities have capacities higher than six persons.

³California Government Code § 65852.2

⁴Welfare and Institutions Code, §5000 et. seq. Health and Safety Code, §1500 et. seq.



Map IV-3
Licensed Residential Care Facilities in Corona

Table IV-3 Licensed Residential Care Facilities

No.	Facility	Address	Capacity
Adult Res	sidential Facility		
1	Ana Maria's Home	3681 Logan Circle	6
2	Arguelles Home	25308 Coral Canyon Road	6
3	Austin Small Arizona Family Home	867 Montague Drive	6
4	Bright Home Garden	13236 Kara Court	6
5	Care Love Home	13691 Dellbrook Street	6
6	Corona Happy Faces Adult Home	2517 Steven Drive	4
7	Crystal Downs Arf, Inc.	1897 Crystal Downs Drive	4
8	Dawson's Arf	7889 Jeannie Ann Circle	4
9	Dignity Living Redwood Home	971 Redwood Court	4
10	Grandview Home	19163 Consul Avenue	4

No.	Facility	Address	Capacity
11	Gypsum Creek Home #1	6976 Gypsum Creek Drive	6
12	Gypsum Creek Home #2	14572 Sleepy Creek Drive	6
13	Lark Residential Home	1008 Meadowview Court	5
14	Manitoba Residential Care	1703 Manitoba Circle	5
15	Maria M. Blaya	1113 Sandra Circle	6
16	Mccoy Adult Group Home	1113 Garretson Ave	6
17	Moquete Family Home, The	7976 Poppy St.	6
18	New Era 1 Care Home	2152 S Vicentia Avenue	6
19	New Life Residence	7384 High Knoll Circle	6
20	Noah's Adult Home	806 Homestead Road	5
21	Noah's Rainbow Adult Home	3510 State Street	6
22	Olive Residential Care	342 E. Olive Street	4
23	Peaceful Living #2	1112 Peaceful Drive	6
24	Peppermint Ridge	825 Magnolia	12
25	Peppermint Ridge - Aspen	860 Aspen Street	6
26	Peppermint Ridge - Cypress Point	632 Magnolia Avenue	6
27	Rancho Road Community Care Home	1035 W. Rancho Road	6
28	Robinson Ranch Adult Home	2520 Monterey Peninsula Drive	6
29	Robinson Ranch Adult Home Ii	1260 Paseo Grande Rd	6
30	Saginario Residential Care	381 West Ontario Avenue	6
31	Taylor-Made Home	13753 Deerpath Cir.	1
32	Tender Loving Care	1125 Silvercreek	6
Adult Day			
33	Basic Occupational Training Center	1121 Bradford Circle	100
34	First Step Corona	237 River Road	75
Elderly A	ssisted Living		4
35	Abbey Elder Care, Inc.	3412 Wexford Circle	6
36	Adorable Home V	7925 Saddletree Court	6
37	Alpine Care Assisted Living	6562 Gold Dust Street	6
38	Amberhill Guest Home	12729 Amberhill Ave	6
39	Bea Living Home Care LLC	1146 Rosemary Circle	6
40	Brookdale Corona	2005 Kellogg Ave	60
41	Brookdale Magnolia	737 Magnolia Ave	180
42	Clarissa's Home Care	2667 Cherrybark Lane	6
43	Corona Residential Care Center Llc	1400 Circle City Dr	125
44	Cresencia Care Home Inc	1785 Honors Ln	6
45	Crown Assisted Living Llc	2105 W. Ontario Ave	6
46	Cura Amore	2394 Monterey Penninsula Dr	6
47	Dellbrook Guest Home	13731 Dellbrook Street	6
48	Eagle Glen Care Home Inc	1697 Honors Circle	6
49	Eastvale Meadows	6885 Cedar Creek Road	6
50	Estancia Del Sol	2489 California Ave	135

No.	Facility	Address	Capacity
51	Gabriela Care Home Inc	1717 Tamarron Drive	6
52	Gio's Elderly Care Inc	1146 Rosemary Circle	6
53	Heart Of Joy Home Care	597 Hamilton Dr	3
54	Inspirations Home Care	2755 Thacker Dr	6
55	Inspirations Home Care II	2800 Cottage Dr	6
56	Inspirations Home Care III	2685 Cottage Dr	6
57	Inspirations Home Care IV	1540 Heartland Way	6
58	Inspirations Home Care V	2865 Cottage Dr	6
59	Inspirations Home Care VI	1117 Carter Ln	6
60	Inspirations Home Care VII	1507 Chestnut Cir	6
61	Lama Residential Care	14384 Pointer Loop	6
62	Living From The Heart	4089 Inverness Dr	6
63	Micah's Elderly Care, Inc.	995 Bouquet Circle	6
64	Monterey Peninsula	2394 Monterey Peninsula	6
65	Monterey Peninsula Iii Llc	1601 Garretson Ave	6
66	Monterey Peninsula Iv	853 W. Crestview Street	6
67	Mountain Gate Board & Care	3032 Ocelot Circle	6
68	New Horizons	7550 Rudell Road	15
69	Starlite Manor	14598 Stonybrook Court	6
70	Valencia Terrace	2300 South Main Street	84
71	Vista Cove At Corona	2600 South Main Street	49
24 Hour	Residential Care for Children		
72	Evelyna's Small Family Home	7970 Vandewater Street	6
73	Gypsum Creek Small Family Home	14485 Dalebrook Drive	2
		TOTAL	1,186

Source: State of California, 2019. https://secure.dss.ca.gov/CareFacilitySearch/

Emergency Shelters

State law requires cities to identify adequate sites, appropriate zoning, development standards, and a permitting process to facilitate and encourage development of emergency shelters and transitional housing. The courts have also passed subsequent rulings.5 To that end, State Law (SB2) requires jurisdictions to designate a zone and permitting process to facilitate the siting of such uses. If a conditional use permit is required, the process to obtain the conditional use permit may not unduly constrain the siting and operation of such facilities. SB2 also permits the City to apply limited conditions to the approval of ministerial permits for emergency shelters. The identified zone must have sufficient capacity to accommodate at least one year-round shelter.

⁵Hoffmaster v. City of San Diego, 55 Cal.App.4th 1098

The City defines "emergency shelter" as housing with minimal supportive services for homeless persons that is limited to occupancy of 180 days or less by a homeless person, as defined by § 50801(e) of the California Health and Safety Code. No individual or household may be denied emergency shelter because of an inability to pay.

According to the 2013-21 Housing Element, in July 2013, the City revised its Zoning Ordinance to allow emergency shelters by right and subject to ministerial review within the M-1 zone (Light Manufacturing Zone), consistent with State law. In addition to the same land use regulations and development standards that apply to all development within the M-1 zone (e.g., lot size, setbacks, building height, etc.), an emergency shelter proposed in this district must be demonstrated to meet the following standards, as permitted by § 65583(a)(4) of the Government Code:

- The proposed shelter is in conformance with the applicable Building and Fire Codes;
- The proposed shelter use is consistent with the General Plan and zoning of the proposed site;
- The maximum number of beds or persons permitted to be served nightly by the facility must be based upon California Building Code Occupancy limits for the building in which the shelter is to be housed or developed;
- Off-street parking must be provided in accordance with CMC Section 17.76.030.A.2 (1.0 space per staff member of largest shift, plus 1.0 space per 12 beds, plus 2.0 guest spaces);
- On-site management must be provided on a 24-hour basis;
- The shelter must be located no less than 300 feet from any other shelter facility;
- The length of stay for any client cannot exceed 180 nights in any one year period; and
- Adequate exterior lighting must be provided and maintained for security purposes.

The M-1 zone in Corona covers more than 2,000 acres and includes 532 parcels. Of this M-1 zoned land, 49 parcels (encompassing 195 acres) are currently undeveloped; the City also currently owns five parcels (totaling 135 acres) of M-1 land. Clusters of M-1 parcels are located along California State Highway 91 and the Railroad corridor. Most M-1 parcels are located within one-half mile of public transit, and several M-1 lots are directly adjacent to public bus routes. Corona's City Hall, hospital, library, senior center, community buildings, Metrolink stations, and other locations serving homeless individuals and families are also located along public transit routes or within walking distance of M-1 parcels.

Emergency shelters are also permitted upon approval by the Board of Zoning Adjustment (BZA) in the M-2 and M-3 zones. Prior to approving an application to establish an emergency shelter within the M-2 or M-3 zones, the BZA must make the following findings:

 At least ten days before the hearing, notice of the application for an emergency shelter was mailed to property owners of record on abutting properties and adjacent properties directly across a street or alley. The notice includes a

- postcard for the property owner's use to return written comments on the proposed shelter and all responses have been considered by the Board;
- Land uses and development in the immediate vicinity of the site will not constitute an immediate or potential hazard to occupants of the proposed shelter;
- The site of the proposed shelter is safely accessible by pedestrians;
- The proposed shelter is located with reasonable access to public agencies and transportation services; and
- Sewer, water, electricity and telephone services will be provided at the site.

Emergency shelter applications in the M-2 and M-3 zones are also subject to the following standards:

- The proposed shelter is in conformance with the Uniform Building and Fire Codes;
- The proposed shelter use is consistent with the General Plan and zoning of the proposed site;
- The proposed shelter meets the development standards that are applicable to the zoning of the proposed site;
- The proposed shelter is at least 300 feet away from any other shelter facility;
 and
- Off-street parking must be provided in accordance with CMC Section 17.76.030.A.2 (1.0 space per staff member of largest shift, plus 1.0 space per 12 beds, plus 2.0 guest spaces).

Any approval by the BZA for an emergency shelter in the M-2 or M-3 zones shall be subject to conditions of approval which must include, but are not limited to, the following:

- No homeless person will be allowed to sleep at the same shelter for more than a total of 180 nights in any one-year period;
- The maximum number of beds or persons permitted to be served nightly by the facility must be based upon California Building Code Occupancy limits for the building in which the shelter is to be housed or developed;
- On-site management is provided on a 24-hour basis; and
- Adequate exterior lighting must be provided and maintained for security purposes.

Transitional and Supportive Housing

According to the 2013-21 Housing Element, the City revised the Zoning Ordinance in July 2013 to define and permit transitional and supportive housing facilities by right in accordance with State law within all zones that allow residential uses. The City's definitions are consistent with definitions for these facilities found in California Health and Safety Code Section 50675.

The City defines transitional housing and transitional housing development as "buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. Transitional housing shall be considered a residential property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Per Health and Safety Code Section 50675.2(d), rental housing development means a structure or set of structures with common financing, ownership, and management, and which collectively contain five or more dwelling units, including efficiency units. No more than one of the dwelling units may be occupied as a primary residence by a person or household who is the owner of the structure or structures."

Supportive Housing is defined in the Zoning Ordinance as "housing with no limit on length of stay that is occupied by the target population as defined in subdivision (d) of Section 53260 of the Health and Safety Code, and that is linked to on-site or off-site services that assist the supportive housing resident in retaining housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. As defined per said section of the Health and Safety Code, target population means adults with low income having one or more disabilities including mental illness, substance abuse, or other chronic health conditions, or individuals eligible for service provided under the Lanterman Development Disabilities Services Act (Division 4.5 [commencing with Section 4500] of the Welfare and Institutions Code) and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless. Supportive housing is provided in residential dwellings or in health care and community facilities listed in Chapter 17.73 under this code and shall be permitted, conditionally permitted or prohibited in the same manner as other residential dwellings or health care and community facilities. Supportive housing shall be considered a residential use of the property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone."

Transitional and supportive housing facilities are subject to the same development standards and permit processing criteria required for single-family and multi-family uses. Facilities that do not meet the City's definition of transitional housing and supportive housing and serve persons with disabilities are regulated as 24-hour care facilities.

Fair Housing Impediment Study: Review of the General Plan and Zoning Ordinance

This Analysis of Impediments to Fair Housing Choice includes the review of the General Plan and the Zoning Ordinance in order to identify regulations, practices and procedures that may act as barriers to the development, siting and use of housing for individuals with disabilities. In addition to the review of these City documents, City Community Development Department staff has been interviewed. The data were analyzed to distinguish between regulatory and practice impediments described by the jurisdiction. **Table IV-4** summarizes the results of this study.

Table IV-4
Fair Housing Impediment Study

Impediment Description	Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Jurisdiction Practice	Comment
Definition of "Family"	Regulatory	Yes	Family is not defined in the Zoning Ordinance.	In July 2013, the City revised the Zoning Ordinance to remove the definition of family.
Definition of "Disability"	Regulatory	Yes	No definition of "Disability" is contained in the Zone Code.	City uses "Disability" definition set forth in State Codes.
Personal Characteristics of residents considered?	Practice	Yes	City does not regulate or consider residents personal characteristics.	City provides equal access to housing for special needs residents such as the homeless, elderly, and disabled.
Mischaracteriz e ADA housing as "Boarding, Rooming House or Hotel"?	Practice	Yes	City's definition of Boardinghouse/ Rooming House does not refer to ADA housing.	City complies with State law regarding housing opportunities. City does not restrict housing opportunities for individuals with disabilities.
On-site supporting services permitted	Practice	Yes	City provides for onsite supporting services.	City complies with State law regarding ADA services.
Restrict number of unrelated persons residing together if they are disabled	Regulatory	Yes	The City does not restrict on the basis of disability.	City complies with State law.

Impediment Description	Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Jurisdiction Practice	Comment
Allow ADA Modifications in municipal- supplied or managed housing	Regulatory	Yes	The City owns and operates public properties. In 2013, the City also revised the Zoning Ordinance to include standards and policies to reasonably accommodate the housing needs of persons with disabilities.	City complies with State law. City encourages ADA access modifications.
Variances & Exceptions to zoning and land-use rules.	Regulatory	Yes	City requires a public hearing for a zoning variance as required by State law, except minor variances that are approved by the Zoning Administrator.	City complies with State law regarding the granting of variances and exceptions to zoning and land-use rules.
Residential Mixed Land Use Standards	Regulatory	Yes	City allows mixed land use development.	Approval of a Specific Plan is required for the entitlement of a mixed use project.
Zoning Exclusion regarding Discrimination	Regulatory	Yes	City does not exclude or discriminate housing types based on race, color sex, religion, age, disability, marital or family status, creed or national origin.	All City zoning and land use regulations and policies comply with Federal and State law regarding the prohibition of discrimination.
Senior Housing Restrictions & Federal Law	Regulatory	Yes	City permits multi- family senior housing in accordance with zoning standards.	"Senior citizen congregate housing" means a building or buildings, together with related exterior facilities, comprised of individuals residential units designed for use and occupancy by senior citizens.

Impediment Description	Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Jurisdiction Practice	Comment
Zoning for ADA accessibility	Regulatory	Yes	City's Building Code provides for ADA access.	City's zone code defers to the 2013 Building Code regarding ADA access.
Occupancy Standards and Limits	Regulatory	Yes	City Zoning Ordinance does not limit occupancy. The State Building and Housing Codes establish criteria to define overcrowding.	City codes comply with State law.
Zoning for Fair Housing	Regulatory	Yes	City's Housing Element promotes Fair Housing; Zoning Ordinance does not conflict with that policy.	City's General Plan promotes and requires compliance with all Fair Housing laws and policies.
Handicap Parking for Multi-Family Development	Regulatory	Yes	City requires 0.3 spaces per unit. The City also adopted State Building Code in 2013.	City codes comply with State and Federal requirements.
Is a CUP required for Senior Housing?	Regulatory	Yes	The City may permit senior citizens housing development and is subject to approval of a CUP (Chapter 17.28.030 and 17.24.030).	City codes comply with State and Federal requirements.
Does City distinguish between handicapped housing and other types of single-family or multi- family housing?	Regulatory	Yes	The City does not distinguish between handicapped housing and other types of housing.	City complies with State and Federal law regarding ADA designed housing.

Impediment Description	Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Jurisdiction Practice	Comment
How are "Special Group Housing" defined in the zone code?	Regulatory	Yes	Not addressed in Zoning Ordinance.	City practices comply with State and Federal law regarding "Special Group Housing."
Does the City's Building and planning codes make specific reference to accessibility requirements as set forth in the 1988 Fair Housing Act?	Regulatory	Yes	City adopted California State Building & Housing Codes.	Community Development Department – Building Division reviews all plans for compliance with adopted codes. Monitoring is the responsibility of the building department.

Summary of General Plan, Land Use and Zoning Ordinance Impediments Study, 2020.

Based on the fair housing impediment study conducted of the General Plan and Zoning Ordinance, there are no impediments to fair housing choice identified at this time.

Development Policy

Development Standards

The Zoning Ordinance provides policy guidance as to the location of housing and establishes minimum residential development standards to ensure quality of construction, preservation and protection of neighborhoods, and the furtherance of broader City goals. **Table IV-5** provides information on single-family and multi-family residential development standards in the City of Corona.

Table IV-5 Residential Development Standards

Zono	Max.	Yaı	rd Setback	xs .	Parking Standard	Max.	Max. Lot
Zone	Density	Front	Side	Rear	Parking per DU	Height	Coverage
Rural/Estat	e Residentia	ıl					
A	1.0du/5.0 acres	20'-25'	15'	10'	2	30'	30%
R-1A	1.0	20'-25'	10'-15'	10'-15'	2	30'	25
R-I-20.0	2.2	20'-25'	10'	10'	2	30'	35' (1-story) 30' (2-story)
R-14.4	3.0	20'-25'	5'-15'	10'-15'	2	30'	40' (1-story) 30' (2-story)
A-14.4	3.0	20'-25'	5'-15'	10'-15'	2	30'	40' (1-story) 30' (2-story)
Low Density	Residentia	l					
R-1-12.0	3.6	20'-25'	7'-10'	10'-15'	2	30'	40' (1-story) 30' (2-story)
R-1-9.6	4.5	20'-25'	5'-10'	10'-15'	2	30'	40' (1-story) 35' (2-story)
R-1-8.4	5.2	20'-25'	5'-10'	10'-15'	2	30'	40' (1-story) 35' (2-story)
R-1-7.2	6.0	20'-23'	5'-10'	10'-15'	2	30'	45' (1-story) 35' (2-story)
MP	8.0	5'	4'	5'	2 + 1 every 4 units	30'	75%
Medium De	nsity Reside	ntial		T			
R-3	12.0	30'	10'-15'	10'	*	35'	40%
R-2	12.1	25'	10'-15'	10'	*	35'	50%
High Densit	High Density Residential						
R-3	36	20'-25'	10'-15'	10'	*	40'	60%
R-3-C	23.2	20'-25'	5'-15'	10'	*	40'	70%

Source: Corona Municipal Code, Title 17 Planning and Zoning, January 2015.

Local Government Fees

Since the passage of Proposition 13 in 1978, local governments have had to diversify their revenue sources. As reliance on General Fund revenues declined, local governments began charging service fees and impact fees to pay for City services needed to support the development of new housing. The City currently charges fees and assessments to cover the costs of processing permits and providing services for residential projects. Development fees depend on the location, project complexity, and cost of mitigating environmental impacts. **Table IV-6** includes planning discretionary fees and **Table IV-7** provides an approximation of the planning and processing fees associated with the development of a 2,000 square foot three-bedroom, two-bathroom, two car garage dwelling on a 7,000 square foot lot.

Table IV-6 Discretionary Fees

Description	Fee*
Conditional Use Permit (Minor)	\$2,672
Conditional Use Permit (Major)	\$6,782
Conditional Use Permit (Major Modification)	\$4,263
Variance (Minor)	\$2,131
Variance (Major)	\$4,447
Tentative Tract Map	\$9,023
Residential Parcel Map Review	\$5,637
Lot Line Adjustment	\$3,463**
General Plan Amendment	\$7,105
Zone Text Amendment	\$4,345
Negative Declaration (with or without Mitigation)	\$6,722
Environmental Impact Review (EIR)	Deposit + Full Cost + \$85
Appeal Planning Commission	\$2,912
Certificate of Compliance	\$2,028

^{*}Additional environmental assessment fees, per lot fees, and other miscellaneous fees may apply.

Source: City of Corona, Effective January 19, 2019.

https://www.coronaca.gov/home/showdocument?id=5237 https://www.coronaca.gov/home/showdocument?id=1608

^{**}Indicates fee for up to 2 lots; fee for over 2 lots is \$3,644 plus \$1,173 per additional lot.

Table IV-7 Planning and Processing Fees

Description	Fee
Building Permit	\$4,912.97
Improvement Plan Check	\$1,500 - \$6,800
Grading Permit	\$60
Water/Sewer Permit	\$15,424 ¹
Grading Permit and Inspection	\$800 - \$2,000

Source: City of Corona, Community Development Dept. 2019
¹Sewer Capacity Fee - \$4,644 + Water Meter Fees - \$10,780.66

Table IV-8 compares the minimum fees charged by Corona with those of Chino Hills, Moreno Valley, and Riverside. As indicated in the table, the fees charged by the City are reasonable to those of the neighboring communities surveyed. Given the modest level of City fees, they are not deemed to be a constraint to the production of single-family housing in Corona.

Table IV-8 Comparison of City Permit Fees

Permit	Norco	Moreno Valley	Riverside	Corona
Conditional Use Permit	\$1,860 -	\$6,365 -	\$3,938 -	\$2,672 -
Conditional ose Fermit	\$7,840	\$10,926	\$8,615	\$6,782
Conditional Use Permit Modification	\$4,015	\$5,875	N/A	\$ 4,263
Variana.	¢2.500	\$663 -	¢1 725	\$2,131-
Variance	\$2,580	\$3,663	\$1,725	\$4,447
Tentative Tract Map	\$16,995	\$11,307	\$10,516	\$9,023
Tentative Residential Parcel Map	\$7,865	\$9,049	\$8,125	\$5,637
Lot Line Adjustment	\$1,096	\$1,168	\$2,431	\$3,463
Zone Change	\$8,705	\$3,500	\$6,868	\$4,858
General Plan Amendment	\$8,705	\$3,500	\$9,9332	\$7,105
Zoning Regulation/Development Code (Text) Amendment	\$3,602	\$5,000	\$6,868	\$4,345

Source: City websites, 2019: <u>City of Norco Fee Schedule, FY 2019-2020</u>; <u>City of Moreno</u> Valley Fee Schedule, FY 2018-2019; City of Riverside Fee Schedule, FY 2019-2020

State law allows local governments to charge fees necessary to recover the reasonable cost of providing services. State law also allows local governments to charge impact fees provided the fee and the amount have a reasonable nexus to the burden imposed on local governments. While the fees in Corona constitute a high percentage of housing sales prices,

the fees are necessary to provide an adequate level of services and mitigate the impacts of housing development. To facilitate affordable housing development and to offset the impact of these fees on development costs, the City has the ability to "gap-finance" projects with various sources.

The City of Corona does not issue permits for mobile homes located in a mobile home park. Permits are issued by the State of California Department of Housing and Community Development, which also conducts any required inspections. The City of Corona will issue permits for the installation of a manufactured home installed on a permanent foundation. The cost of the permit is based on the valuation of the work needed to construct the permanent foundation and related construction activity.

Building Codes

Building codes are enacted to ensure the construction of quality housing and to further public health and safety. Ensuring that buildings are accessible to people with disabilities is an important way to improve fair housing. However, the rigid adherence to non-essential codes may indirectly create discriminatory impacts on people with disabilities. The following discusses the City's building codes and applicability to persons with disabilities.

On December 4, 2013, the City of Corona adopted Ordinance 3159, which itself adopted the 2013 Edition of the California Building Standards, Green Building Standards, Residential, Plumbing, Mechanical, Electrical and Fire Code (Title 24 of the California Code of Regulations). The California Building Standards Commission updates these codes every three years based on updates to uniform codes adopted by professional associations (such as the International Conference of Building Officials. In 2016 the City adopted Ordinance 3251, which states: "...all the rules, regulations, provisions and conditions set forth in that certain document being marked and designated as the 2016 California Building Code, Chapter 1 Division II are hereby adopted."

State law allows cities to add local, more restrictive, amendments to the California Building Code, provided such amendments are reasonably necessary to address local climatic, geological, or topographic conditions. The City has adopted local amendments including revising the grading restrictions and amending Tile 15 of the Corona Municipal Code. None of these amendments directly or indirectly limits the type of housing opportunities available to disabled people nor limits access to housing.

Accessibility Standards

Cities that use federal funds must meet federal accessibility guidelines that accommodate people with disabilities. For new construction and substantial rehabilitation, at least 5 percent of the units must be accessible to persons with mobility impairments and an additional 2 percent of the units must be accessible to persons with sensory impairments. New multiple-family housing must also be built so that:

• The public and common use portions of such units are readily accessible to and usable by disabled persons;

- The doors allowing passage into and within such units can accommodate wheelchairs; and
- All units contain adaptive design features.⁶

The U.S. Department of Housing and Urban Development (HUD) also recommends, but does not require, that the design, construction and alteration of housing units incorporate, wherever practical, the concept of visibility. This recommendation is in addition to requirements of Section 804 of the Fair Housing Act. Recommended construction practices include wide enough openings for bathrooms and interior doorways and at least one accessible means of egress/ingress for each unit.7

The City follows Title 24 of the California Code of Regulations, which includes regulations that govern accessibility for persons with disabilities. The regulations apply to new construction in multifamily residential buildings. Many major rehabilitation projects undertaken by the City in the recent past have incorporated ADA accessibility guidelines where possible. Apartments such as the River Run Senior Apartments, William C. Arthur Terrace Senior Apartments, and the Casa de La Villa family apartments are all ADA compliant.

Reasonable Accommodation

In 2001, the State Office of the Attorney General issued a letter encouraging local governments to adopt a reasonable accommodation procedure.8 The Department of Housing and Community Development has also urged the same. The federal Fair Housing Act and California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodation when such accommodation may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The State Attorney also provided guidance on the preferred procedure.

Some cities handle requests for reasonable accommodations pursuant to a variance or conditional use permit. Courts have concluded that such requirements do not necessarily violate the FHA. However, a variance technically requires findings that physical site constraints preclude full use of a property. A request for reasonable accommodation is due to an individual's disability. Situations could arise where a request could be denied under a variance finding but still be valid as a reasonable accommodation.

In 2013, the City revised the Zoning Ordinance to include standards and policies to reasonably accommodate the housing needs of persons with disabilities. The City's Zoning Administrator has ministerial authority to hear and decide applications for reasonable accommodation as provided by the federal Fair Housing Amendments Act and California's

⁶Section 804(f)(3)(C) of the Fair Housing Act.

⁷ HUD Directive. Number 00-09.

⁸State Office of Attorney General, May 15, 2001.

Fair Employment and Housing Act to allow reasonable remedy from zoning standards for individuals with physical or mental impairment.

Accessory uses such as wheelchair ramps are also permitted within all residential zones as incidental structures related to the residence. The building permit process facilitates most reasonable accommodation requests to increase accessibility of existing properties. Other community programs such as the Fair Housing Program and Conservation of Existing and Future Affordable Housing Units Program, help ensure the special needs of the disabled population will be met.

Permit Processing

The permit procedures are designed to ensure that residential development proceeds in an orderly manner so as to ensure the public's health, safety, comfort, convenience, and general welfare. Although permit processing procedures are a necessary step, unduly burdensome procedures can subject developers to considerable uncertainty, lengthy delays, and public hearings that cumulatively make a project financially infeasible. State law requires communities to work toward improving the efficiency of building permit and review processes by providing one-stop processing, thereby eliminating the necessary duplication of effort. The Permit Streamlining Act helps reduce governmental delays by limiting processing time in most cases to one year and requiring agencies to specify the information needed to complete an acceptable application.9 The City makes available to applicants and developers a procedural guide and checklist for submitting applications.

Most residential uses, including single- and multi-family, do not require any discretionary review other than the subdivision process (if applicable). However, larger projects with single-family residential subdivisions consisting of five or more parcels and all multi-family construction projects must undergo a site plan and architectural review, known as a Precise Plan review. Precise Plan review is intended to ensure that development projects are well designed and compatible in terms of scale and aesthetics with surrounding areas and in accordance with applicable city requirements, policies and guidelines. Single-family homes, second units, transitional housing, and mobile home projects in the appropriate zone are subject to ministerial design review. The Precise Plan requirement is waived for projects that require a Conditional Use Permit.

The Community Department staff reviews all single-family residential developments. If the staff determines that the project complies with the provisions of the Municipal Code, they have the authority to approve or conditionally approve the development scheme. To guide the review process, providing consistent criteria for review, the City has adopted design guidelines for single-family and multi-family residential development, as well as commercial and industrial development citywide.

Based on this information, the permit procedures and processing timeframes are appropriate and do not appear to constrain the development of housing.

⁹Government Code Section 65920 et seq.

Assessment

HCD reviews development processing procedures to ensure that such procedures facilitate and encourage the construction of housing for all income levels. HCD often considers that a conditional use permit for multi-family housing subjects the project to unfounded neighborhood criticism that can often lead to rejection of a project that otherwise complies with City regulations. The City is committed to providing sites that are capable of providing housing accommodation that meets its fair share of the Regional Housing Need Assessment (RHNA). The removal or mitigation of impediments that prevent achievement of this goal is essential.

State law prohibits a local agency from disapproving a low income housing development, or imposing conditions that make the development infeasible, unless one of six conditions exists. Three conditions are of primary importance: 1) the project would have an unavoidable impact on health and safety which cannot be mitigated; 2) the neighborhood already has a disproportionately high number of low income families; or 3) the project is inconsistent with the general plan and the housing element is in compliance with state law.10

Community Representation

The City values citizen input in terms of how effectively it serves its residents. The City Council relies on its boards and commissions to provide advice and recommendations in areas of City services. Corona makes an effort to ensure that advisory boards and commissions reflect the diversity of the City's residents. Boards, commissions, and advisory committees that have responsibility for land use, building, and other policies that could affect fair housing choice include:

- Housing Authority of the City of Corona (CHA);
- Project Review Committee;
- Planning and Housing Commission; and
- Board of Zoning Adjustment.

For further information, Title 17 of the Corona Municipal Code describes the Planning and Housing Commission, its scope and authority, election or appointment regulations, and functions. Information on the Project Review Committee can be found on the City's website.

Tenant Selection Procedures

An examination of the County of Riverside Housing Authority's tenant selection procedures did not reveal any impediments to fair housing choice. Based on information provided by the Housing Authority, no complaints were received from prospective tenants alleging

¹⁰Government Code Section 65589.5

discrimination or unfair practices in the Housing Authority's selection of tenants to utilize Housing Choice Vouchers or occupy Project-Based Section 8 units.

Fair Housing Monitoring

Fair housing issues within the City are monitored under contractual arrangement with the Fair Housing Council of Riverside County (FHCRC). FHCRC provides counseling and dispute resolution services pertaining to fair housing issues such as discrimination and tenantlandlord rights, and addresses issues identified by the City.

At least one alleged instance of discrimination within the broader housing market in Corona garnered some media attention, suggesting the existence of fair housing issues beyond the affordable housing realm. A recent Business feature in The Press Enterprise stated, "A real estate agency that manages the sales office at a Corona townhome complex has agreed to a \$10,000 payment as a settlement of an allegation of racial discrimination...The conciliation agreement was announced Tuesday by the U.S. Department of Housing and Urban Development. CADO Real Estate Group and LCG Harrington, the agents that handle sales and mortgages for Boardwalk Townhomes in Corona, voluntarily accepted the agreement, part of a process that does not include any admission that they violated fair housing laws." ("Corona townhouse office settles federal claim racial discrimination." **Iack** Katzanek. 2019. Iulv https://www.pe.com/2019/07/24/corona-townhouse-office-settles-federal-claim-ofracial-discrimination/)

Residential Anti-Displacement Policy

It is the policy of the City of Corona to comply with the requirements of Section 104(d) of the Housing and Community Development Act of 1974 with respect to the prevention and minimization of residential displacement as a result of the expenditure of HUD assistance.

Housing—Employment—Transportation Linkage

The City of Corona has numerous plans that impact housing opportunity, provision of public services, and access to public transit within the community. These plans include the City's General Plan and Housing Element. This section addresses how Corona furthers fair housing for its residents through housing, service, and transit policies.

This section first provides details on how the City of Corona and other agencies further fair housing for City residents through housing programs, employment, and services. The section concludes with an analysis of transit policies and services to determine if there are impediments to fair housing that are apparent as a result of the locations and concentrations of housing and employment centers as related to public transportation routes in the City.

Housing Programs

The 2013-2021 Housing Element sets forth various housing goals for the community, accompanied by many implementing policies and programs. The Housing Element has identified five main issue categories including:

- Conserve and improve the existing stock of affordable housing;
- Provide adequate sites to achieve a variety and diversity of housing;
- Assist in the development of affordable housing;
- Remove governmental constraints as necessary; and
- Promote equal housing opportunity.

Some of the key programs affecting housing for low- and moderate-income residents include:

Residential Rehabilitation Program

This program provides forgivable loans of up to \$25,000 per owner-occupied dwelling unit to address critical home improvement needs such as the remediation of code violations, heating and air conditioning, exterior or interior paint, water heater replacement, roofing, plumbing, electrical, kitchen and bathroom facilities, termite eradication/repair and accessibility improvements. This activity may provide a sub-grant to Habitat for Humanity to assist mobile homes.

Housing Choice Voucher Program

Under this program, which is implemented through the Riverside County Housing Authority, very low-income renters receive supplemental assistance for rent so they can afford standard housing without becoming rent burdened. The Housing Choice Voucher Program extends rental subsidies to lower income families and the elderly who spend more than 30 percent of their income on rent. The subsidy represents the difference between the excess of 30 percent of the monthly income and the fair market rent.

Riverside County Housing Authority's objectives are to provide tenant-based rental assistance to approximately 350 households annually, compile and maintain a list of properties that participate in the program, and create and implement an outreach program to promote the vouchers to property owners.

Conservation of Existing and Future Affordable Units

The latest City of Corona Housing Element, 2013-2021, which was adopted January 27, 2014, contains an at-risk housing analysis for the period that extends from October 15, 2013, through October 15, 2023. The underlying income use restrictions of these projects were reviewed for potential conversion to market rate during this planning period. These projects are listed in Table II-21 of Chapter II of this document, with detailed information.

Of the eight housing developments at risk of conversion, three had affordability covenants that were eligible for renewal on a yearly basis. Another was eligible for a five-year renewal in 2017, and three others were subject to pending litigation. Still one more was slated to expire in January of the current year.

Combined, a total of 269 assisted units will be at risk between October 2013 and October 2023. These projects are assisted by HUD Section 202, HUD Section 8, and by the Mortgage Revenue Bond program. Section 202, the Handicapped and Elderly Housing Program, provides loans to help build or rehabilitate handicap or elderly units. A total of 174 units are assisted under this program and/or the Section 8 program. The Mortgage Revenue Bond program facilitates the construction of bond-financed projects wherein the property owner deed-restricts the units as affordable housing to low-income households in exchange for preferential financing. Given the improved market conditions, these deed-restricted units most likely can command higher rents in the market than the rents allowed by the deed restriction. A total of 95 units are assisted under this program.

It is the objective of the City to either retain or replace as low income housing all 269 atrisk units in the City. The City shall make financial resources available through CDBG, HOME, federal, state, and local sources to preserve units at risk.

Neighborhood Improvements

This program consists of public improvements such as streets, curbs, gutters, and water lines in addition to the Graffiti Removal Program. Important to a successful housing preservation program is the borrowers' "willingness" to make improvements. Most property owners will only make further investments in their property if they believe that there is an optimistic future for the particular neighborhood where the property is located and that their additional investment in their property will be matched by other owners. The City will continue to develop methods designed to increase the City's collective sense of community pride. Additionally, the City is currently updating the property maintenance ordinance and implements design review and its historical preservation ordinance.

Density Bonus Program

The City's density bonus program complies with state law (Government Code Section 6591 for affordable housing). This program incorporates mandates by SB1818 and other recent legislative changes. The purpose of the program is to provide incentives to the private sector to build very low and low income housing, donate land, or build housing for seniors and the disabled, by increasing the number of units above that normally permitted by the zoning.

In addition, the City offers density increases above and beyond the State density bonus law. For senior housing and housing for persons with disabilities, the City offers density increases up to a maximum of 75 units per acre by right for both affordable and market-rate developments. Furthermore, with the recent amendment to the North Main Street Specific Plan, multi-family residential development in the Mixed Use and Urban Residential districts can reach a density of up to 60 units per acre.

Fair Housing Program

The City is committed to supporting advocacy and educational activities to reduce or eliminate discrimination. The City contracts with the Fair Housing Council of Riverside County (FHCRC) for the provision of fair housing services. The FHCRC provides fair housing services to Corona residents, landlords, and interested professionals such as local realtors and lenders. FHCRC provides counseling and dispute resolution services pertaining to fair housing issues (i.e. discrimination, tenant-landlord rights, etc.) and addresses identified impediments to fair housing choice on behalf of the City. As a partner to the City and other local jurisdictions, the FHCRC has also become involved with foreclosure prevention by conducting community foreclosure prevention workshops and individual housing counseling. As a HUD-approved housing counseling agency, the FHCRC conducts monthly workshops for first-time homebuyers.

Table IV-9 shows all of the issue categories, policies and programs to be implemented in the City to achieve its housing goals.

Table IV-9
Housing Programs Included in the 2013-21 Housing Element

nousing Frograms included in the 2013-21 housing Element						
Goal Category / Housing Element Policy	Implementing Program					
Goal No. 1 - The City of Corona will promote and maintain a balance of housing types and corresponding affordability levels to provide for the community's needs for housing within all economic segments of the City.						
Policy 1.1: Continue to support public and private sector nonprofit and for-profit organizations in their efforts to construct, acquire, and improve housing to provide access to affordable housing to lower and moderate-income households.	 Neighborhood Improvements (Enhancing Community Pride) Affordable Housing Development Density Bonus Program Zoning Ordinance Monitoring Development Fees Expedited Project Review and Hearing Process Fair Housing Program Homeless and Special Needs Support Services 					
Policy 1.2: Promote specific plans that provide a variety of housing types and densities based on the suitability of the land, including the availability of infrastructure, the provision of adequate City services and recognition of environmental constraints.	 Multi-Family Acquisition and Rehabilitation Infill Housing Development 					

Goal Category / Housing Element Policy	Implementing Program			
Policy 1.3: Provide sites for residential development so that scarcity of land does not unduly increase the cost or decrease the availability of housing for all segments of the community.	Multi-Family Acquisition and Rehabilitation			
Policy 1.4: Support the development of sustainable projects that reduce demand for water and energy resources, reduce commute times and operational costs, and provide for transit oriented development.	Site AvailabilityDensity Bonus ProgramDevelopment Fees			
Policy 1.5: Create or expand zoning designations and commensurate development standards to encourage flexibility in permitted land use types that respond to changing market forces and provide opportunities for higher density residential development, mixed use residential/commercial development, and transit oriented residential development in appropriate areas of the City.	 Multi-Family Acquisition and Rehabilitation Infill Housing Development Density Bonus Program Development Fees Expedited Project Review and Hearing Process 			
Goal No. 2 – The City of Corona will promote and preserve suitable and affordable housing for persons with special needs, including large families, single-parent households, the disabled, and seniors, and shelter for the homeless.				
Policy 2.1: Encourage the development of rental units with three or more bedrooms to provide affordable housing for large families.	 Zoning Ordinance Monitoring Development Fees Fair Housing Homeless and Special Needs Support Services 			
Policy 2.2: Work with nonprofit agencies and private sector developers to encourage development of senior housing.	 Multi-Family Acquisition and Rehabilitation Infill Housing Development Zoning Ordinance Monitoring Development Fees Expedited Project Review and Hearing Process Fair Housing 			

Goal Category / Housing Element Policy	Implementing Program			
Policy 2.3: Encourage the production of assisted living facilities (single-story houses and apartments) for the disabled and the elderly.	 Multi-Family Acquisition and Rehabilitation Infill Housing Development Zoning Ordinance Monitoring Development Fees Fair Housing Homeless and Special Needs Support Services 			
Policy 2.4: Provide emergency shelter with transitional support for City residents, including disadvantaged groups.	Homeless and Special Needs Support Services			
Policy 2.5: Encourage the upgrade and conversion of older motels to single-room occupancy housing.	Fair HousingHomeless and Special Needs Support Services			
Goal No. 3 – The City of Corona will maintain high quality residential development standards to ensure the establishment of livable neighborhoods with lasting safety and aesthetic value, and to promote the maintenance and preservation of historic neighborhoods.				
Policy 3.1: Recognize the City's inventory of existing historic structures and seek programs to enhance and preserve those neighborhoods.	Residential RehabilitationSustainable BuildingAffordable Housing Development			
Policy 3.2: Encourage the revitalization of the existing dwelling units in the circle area through rehabilitation programs.	Residential RehabilitationAffordable Housing Development			
Policy 3.3: Provide public services and improvements that enhance and create neighborhood stability.	Sustainable Building			
Policy 3.4: Continue to establish and enforce property maintenance regulations that promote the sound maintenance of property and enhance the livability and appearance of residential areas.	 Residential Rehabilitation Sustainable Building Affordable Housing Development Density Bonus 			
Policy 3.5: Maintain design review for new residential developments to ensure the construction of livable and aesthetically pleasing neighborhoods.	Expedited Project Review and Hearing Process			

Goal Category / Housing Element Policy	Implementing Program			
Goal No. 4 – The City of Corona will ensure that housing opportunities are available to all persons without regard to race, color, ancestry or national origin, religion, marital status, familial status, age, gender, disability, source of income, sexual orientation, or any other arbitrary factors.				
Policy 4.1: Coordinate housing actions with social service agencies and support efforts of organizations dedicated to working toward elimination of discrimination in housing.	 Homeless and Special Needs Support Services [Continue to work with and support FHCRC] ? 			
Policy 4.2: Promote and provide for nondiscrimination in all City programs.	Fair Housing			

Public Services and Facilities

A variety of public services and facilities are available to Corona residents. Some of the key facilities and services are identified in **Table IV-10**.

Table IV-10
Public Services and Facilities

Public Facility	Location		
City Hall	550 S. Vicentia Avenue		
Auburndale Park & Community Center	1045 Auburndale Street		
Border Park	2400 Border Avenue		
Brentwood Park & Center	1646 Dawnridge Drive		
Buena Vista Park	2515 S. Buena Vista Avenue		
Butterfield Park & Dog Park	1886 Butterfield Drive		
Chase Park	1415 E. Chase Drive		
Circle City Center	365 N. Main Street		
Citrus Park	1250 Santana Way		
City Park	930 E. 6 th Street		
Civic Center Gym	550 S. Vicentia Avenue		
Contreras Park	902 Railroad Street		
Corona Animal Shelter	1330 Magnolia Avenue		
Corona Municipal Airport	1901 Aviation Drive		
Corona Public Library	650 South Main Street		
Corona Senior Center	921 S Belle Ave		
Cresta Verde Park	640 Collett Avenue		

Public Facility	Location		
Department of Water & Power	755 Public Safety Way		
Eagle Glen Park	4190 Bennett Avenue		
El Cerrito Sports Park	7500 El Cerrito Road		
Fairview Park	1604 Fairview Drive		
Fire Department Headquarters	735 Public Safety Way		
Fire Station #1	540 Magnolia Avenue		
Fire Station #2	225 East Harrison Street		
Fire Station #3	790 South Smith Avenue		
Fire Station #4	915 North McKinley Street		
Fire Station #5	1200 Canyon Crest		
Fire Station #6	110 West Upper Drive		
Fire Station #7	3777 Bedford Canyon		
Fiesta Bandshell	930 E. 6 th Street		
Fresno Canyon	Palisades Drive and Green River Road		
Historic Civic Center Theater	815 W. Sixth Street		
Husted Park	1200 Merrill Street		
Jameson Park	1155 Valencia Road		
Joy Park	S Joy St		
Kellogg Park	1635 Kellogg Avenue		
Lincoln Park	1810 S. Lincoln Avenue		
Mangular Park	2200 Mangular Avenue		
Merrill Park	1000 S. Merrill Street		
Mountain Gate Park	3100 S. Main Street		
Ontario Park	2145 Via Pacifica		
Parkview Park	2094 Parkview Drive		
Police Department	730 Public Safety Way		
Promenade Park	615 Richey Street		
Ridgeline Park	2850 Ridgeline Drive		
Rimpau Park	1155 E. Ontario		
River Road Park & Community Center	1100 W. River Road		
Rock Vista Park	2481 Steven Drive		
Sage Open Space	Sage Avenue and Ontario Avenue		
Santana Park	598 Santana Way		
Serfas Club Park	2575 Green River Road		

Public Facility	Location	
Sheridan Park	300 S. Sheridan Street	
Spyglass Park	1790 Spyglass Drive	
Stage Coach Park	2125 Stagecoach Park	
Tehachapi Park	2113 Syskiyou Lane	
Victoria Park & Community Center	312 9th Street	
Village Park	860 Village Loop Drive	

Source: City of Corona, 2019, https://www.coronaca.gov/about-us/facility-directory.

Employment in Corona

A variety of career opportunities are available in Corona with large employers. These entities mainly employ residents in the education, medical, and municipal realms, but they also include manufacturing interests unique to the area, such as Fender, USA, renowned manufacturer of quality guitars, and beverage producer Monster Energy. The city's top ten employers are shown in **Table IV-11**.

Table IV-11 Principal Employers

Employer	Number of Employees	% of Total City Employment	Type of Business	
Corona-Norco Unified School District	5,478	6.55%	Education	
Corona Regional Medical Center	1,200	1.44%	Medical	
Kaiser Permanente	995	1.19%	Medical	
All American Asphalt	840	1.00%	Construction	
City of Corona	785	0.94%	Municipal	
TWR Framing Enterprises	750	0.90%	Construction	
Fender USA Corona	675	0.81%	Mfg/Retail	
Monster Energy	607	0.73%	Mfg/Retail	
Thermal Structures	500	0.60%	Mfg/Retail	
Veg Fresh Farms	425	0.51%	Agriculture/Retail	
Total	12,255	14.67%		

Source: City of Corona Comprehensive Annual Financial Report, Year ended June 30, 2018.

Housing—Employment—Transportation Linkage

Public transit helps move people who cannot afford personal transportation or who elect not to drive. Elderly and disabled persons also rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Many lower income persons are also dependent on transit to go to work. 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.

Local and Regional Services. The Riverside Transit Agency (RTA) was established as a Joint Powers Agency on August 15, 1975 and began operating bus service on March 16, 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, providing driver training, assistance with grant applications and development of Short Range Transit Plans (SRTPs).

RTA provides both local and regional services throughout the region with 39 fixed-routes, eight CommuterLink routes, and Dial-A-Ride services. In the cities of Corona, Beaumont and Banning, RTA coordinates regional services with municipal transit systems. In Riverside, RTA coordinates with the city's Riverside Special Services, which provides ADA complementary service to RTA's fixed-route services. Table IV-11 shows RTA fixed route bus lines operating in Corona.

Table IV-12
Riverside Transit Agency (RTA) Bus Lines in Corona

Route	Description
_	UCR - Downtown Riverside - Galleria at Tyler - Corona Transit Center
1	UCR – Downtown Riverside - Riverside-Downtown Metrolink Station - Smith & 6th - W. Corona Metrolink
3	Eastvale - Norco - Corona Transit Center - 10th & Belle
205/206	Temecula – Murrieta – Lake Elsinore Outlet Center Park and Ride - Tom's Farms - Dos Lagos - Corona Transit Center - Village at Orange

Source: RTA, 2019.

In compliance with ADA and Title VI of the Civil Rights Act, RTA offers a Dial-A-Ride program to disabled people who are unable to use fixed-route bus service. This program 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.

On July 1, 2019, RTA implemented its first fare increase in more than a decade. According to the agency's website, "The changes follow more than a month of community meetings and a public hearing. RTA's fares have been generally lower than that of neighboring transit

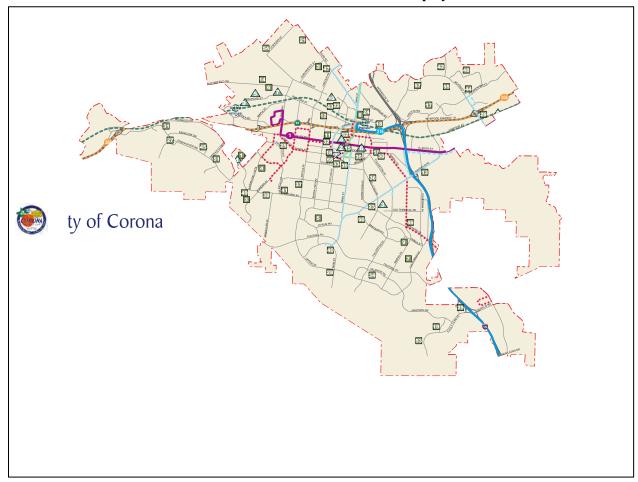
agencies. But with rising operational costs, expanded service, and a state requirement that passenger fares pay a certain percentage of overall operational costs, RTA is compelled to make a fare adjustment to continue to receive state funding and maintain existing service levels. A second round of fare adjustments is expected in 2021."

Transit fares depend on the type of user and number of trips purchased. The base fare for fixed routes is now \$1.75 for a one-way trip, with seniors, disabled persons, Medicare card holders and veterans eligible for a discounted rate of \$0.75. Day passes are available for \$5; for seniors, disabled persons, Medicare card holders, and veterans, \$2.50. A 30-day pass is available for \$60.00, with a discounted fare for youth (grades 1-12) of \$45.00, and a discounted fare for seniors, disabled persons, Medicare card holders, and veterans of \$30.00. Children under 46" and under can ride for \$0.50.

CommuterLink fares are \$3.50 for the general public and for youth, with a discounted fare of \$2.75 for seniors, the disabled, Medicare card holders, veterans and children under 46" tall. Day passes are \$10 and \$7, respectively for the general public and the aforementioned eligible groups, except children. Thirty-day passes are available for \$95 and \$70 for the same groups. Dial-a-Ride and Dial-a-Ride Plus services are available to seniors and the disabled for \$3,50 to \$10.50, with ten-ticket books available for \$35. Children under 46" tall ride for \$0.75.

To further meet the various transit needs of its residents, Corona offers fixed bus route transportation services, called Corona Cruisers. The Cruiser runs along pre-designated Blue Line and Red Line fixed routes. During peak commuting hours, both routes offer commuter service to and from North Main Corona Metrolink Station. For the general public, it is \$1.50 per ride. Seniors who are 60+ years old, Medicare card holders, and persons with disabilities receive a discounted rate of \$0.70 per ride. Children ride for \$.25. Day passes for the general public are \$4.00, and seniors, Medicare card holders, and persons with disabilities are charged \$2.00.

Map IV-4 shows public facilities and employers in relation to public transportation routes. A majority of the large employers and public facilities are located within ½ to 1 mile from a public transit line or train.



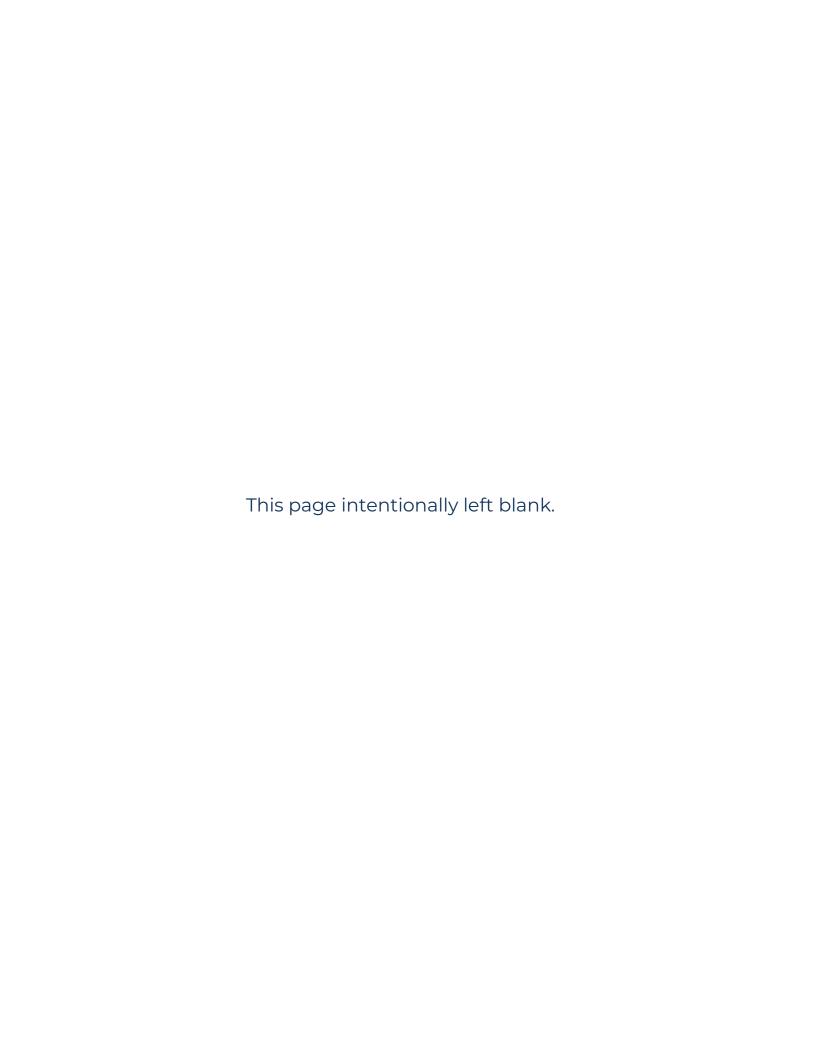
Map IV-4
Transit Access to Public Facilities and Employers

Source: City of Corona websites, 2019; Corona Comprehensive Annual Financial Report 2018.

Several public parks are more than a mile away from transit: among them, Jameson Park, Eagle Glen Park, Spyglass Park, and Stagecoach Park. Jameson Park, located at 1155 Valencia Road, is 1.6 miles from the Blue Line bus stop at 2901 South Main Street and Chase Drive, and the Blue Line bus stop at South Main Street at Albertsons. The ADA accessible park has 13.05 acres with drinking fountain and restrooms. Eagle Glen Park, located on 4190 Bennett Avenue, is 1.7 miles from the Red Line bus stop at 2530 Tuscany Street at King's Fish House. This park has 13.47 ADA accessible acres along with many amenities, including a softball field, tennis court, soccer field, restrooms, a picnic and barbecue area, covered shelter and children's play equipment. Spyglass Park, located at 1790 Spyglass Drive, is 2.0 miles from the Red Line bus stop at King's Fish House on Tuscany Street. This 5-acre ADA accessible park contains a covered shelter, picnic area and restrooms. Stagecoach Park, located at 2125 Stagecoach Road, is also 2.0 miles from transit, with the nearest bus connection located at Business Center and Commerce. The park encompassed 9.06 acres and includes barbecue facilities, covered shelter, drinking fountain, picnic area, playground, and restrooms.

Other parks are on the cusp of what is considered a walkable distance from mass transit. These include Fairview Park, which is just 1.1 miles from the Blue Line bus stop at River Road and Lincoln, and Parkview Park, 1.1 miles from the Blue Line stop at Costco at 410 N. McKinley.

None of these parks, however, is considered an impediment to fair housing choice. There are several alternative parks nearby public transit that are accessible to the community. Additionally, major transit lines service areas where there are high population densities.



Analysis of Current Fair Housing Activity

Fair housing services include investigation of discrimination complaints, auditing and testing, education, and outreach. Landlord-tenant counseling services involve informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations and mediating disputes between landlords and tenants. This section reviews the fair housing services available in Corona and the nature and extent of fair housing complaints.

The City of Corona has contracted with the Fair Housing Council of Riverside County, Inc. (FHCRC), a non-profit organization that fights to protect the housing rights of all individuals. Since 1986, FHCRC's mission is "to provide comprehensive services which affirmatively address and promote fair housing (anti-discrimination) rights and further other housing opportunities for all persons without regard to race, color, national origin, religion, sex, familial status (presence of children), disability, ancestry, age, sexual orientation, marital status, source of income or other arbitrary factors."

FHCRC provides services focused on eliminating housing discrimination, general housing assistance, and education and outreach activities to all residents in the Riverside County except for residents of the City of Indio and the City of Cathedral City, who are served by the Inland Fair Housing and Mediation Board (IFHMB). The comprehensive services offered throughout Riverside County include:

- **Fair Housing (Anti-Discrimination) Services:** Provide educational workshops, outreach to the community, and investigation of discrimination complaints from residents. Residents who feel they have been discriminated against in securing or maintaining housing are encouraged to contact FHCRC at (951) 682-6581, to reach out via email at fhcrc@fairhousing.net. FHCRC also operates a Corona office located at the Corona Public Library, 650 South Main Street, Corona, CA 92882 on Thursdays from 10 a.m. to 1:00 p.m. For more information, contact the Corona office at (951) 371-6518. Complainants are ultimately provided with fair housing education, counseling, referral to the State Department of Fair Employment and Housing (DFEH), HUD or a private attorney.
- Landlord-Tenant Services: Services including education, counseling, and mediation to both landlords and tenants to resolve disputes concerning a host of common issues impacting the business relationship between tenants and landlords. Common issues to be addressed in this category of service include eviction, occupancy standards, repairs, deposits, lease/rental terms, rental assistance, rent increases, habitability and notices.
- Housing Counseling Services: Pre-purchase workshops, mortgage delinquency and default resolution counseling, pre-purchase counseling, rental housing counseling and services for homeless counseling or referrals.

• Training for Real Estate Professionals: Training workshops for landlords, managers and owners in the following areas: Landlord/Tenant issues, First-Time Homebuyer, Foreclosure Prevention, and Fair Housing Laws.

Fair Housing Education

FHCRC provides a comprehensive, extensive and viable education and outreach program and services. FHCRC has been actively involved in outreach activities in Corona as part of its services to the City, including the provision of informational materials, brochures, newsletters, and referrals relating to fair housing. FHCRC also provides workshops, presentations, and seminars to community organizations including presentations at the Corona Chamber of Commerce, Corona UNITY meetings, and the Corona Public Library. FHCRC conducts outreach and education activities as follows:

- 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, 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 multi-lingual literature in the City, aimed at a variety of audiences,
 describing how housing injustices arise, the laws that protect against housing
 discrimination, and ways to prevent housing inequality.

Table V-1
Countywide Education and Outreach Provided by FHCRC – 2017-2018

Activity Type	Number	
Workshop: First-Time Homebuyer	20	
Workshop: Fair Housing	3	
Workshop: Landlord-Tenant	3	
Presentation / Attendance at Meetings or Events	35	
Fair Housing Initiatives Program -Testing	132	
Pieces of Literature Distributed	12,693	

Source: FHCRC, 2017-2018 Quarterly Reports.

Fair Housing Enforcement

Discrimination Complaint Intake and Investigation

FHCRC responds to discrimination inquiries and complaints in an expedient manner, relying on over 30 years of experience in the industry. Determining whether a client is inquiring regarding a fair housing discrimination problem or a non-discrimination landlord/tenant or other problem can be difficult. Often what may appear at first to be a simple landlord/tenant dispute turns out to be a situation where a landlord has violated one or more fair housing laws.

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.

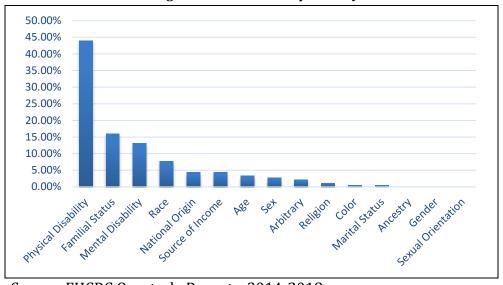
During the five-year period studied, FHCRC assisted many Corona residents with fair housing discrimination complaints, addressing 182 complaints in total. Consistent with state and national trends, the leading bases of complaints included physical disability (44 percent), familial status (16 percent), mental disability (13 percent), race (8 percent), national origin (4 percent), source of income (4 percent) and age (3 percent). Taken together, complaints based on disability status accounted for 57 percent of all cases in Corona, nearly 7 percentage points lower than the proportion of disability-related complaints reported countywide during the same time period. **Table V-2** and **Graph V-1** on the following page show the basis of FHCRC discrimination complaints.

Table V-2
Fair Housing Discrimination Complaints by Basis

Basis	2013- 2014	2014- 2015	2015- 2016	2016- 2017	2017- 2018	Total
Age	2	3	1	0	0	6
Ancestry	0	0	0	0	0	0
Arbitrary	0	2	2	0	0	4
Color	0	1	0	0	0	1
Familial Status	3	19	3	1	3	29
Gender	0	0	0	0	0	0
Marital Status	1	0	0	0	0	1
Mental Disability	1	4	6	7	6	24
National Origin	2	2	0	2	2	8
Physical Disability	9	16	9	30	16	80
Race	5	3	4	1	1	14
Religion	0	0	1	1	0	2
Sex	0	2	1	1	1	5
Sexual Orientation	0	0	0	0	0	0
Source of Income	3	1	0	1	3	8
Total:	26	53	27	44	32	182

Source: FHCRC Quarterly Reports, 2014-2018.

Graph V-1
Fair Housing Discrimination Complaints by Basis



Source: FHCRC Quarterly Reports, 2014-2018.

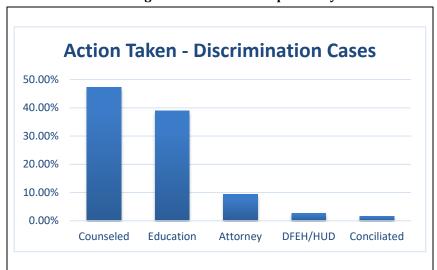
Table V-3 and **Graph V-2** show the services rendered for the 182 discrimination complaints.

Table V-3
Actions Taken for Fair Housing Discrimination Complaints

Action	2013- 2014	2014- 2015	2015- 2016	2016- 2017	2017- 2018	Total
Counseled	17	20	14	23	10	86
Education	6	18	12	17	18	71
Attorney	0	14	0	3	0	17
DFEH / HUD Referral	0	1	1	1	2	5
Conciliated	3	0	0	0	0	3
Total:	26	53	27	44	32	182

Source: FHCRC Quarterly Reports, 2014-2018.

Graph V-2
Fair Housing Discrimination Complaints by Basis

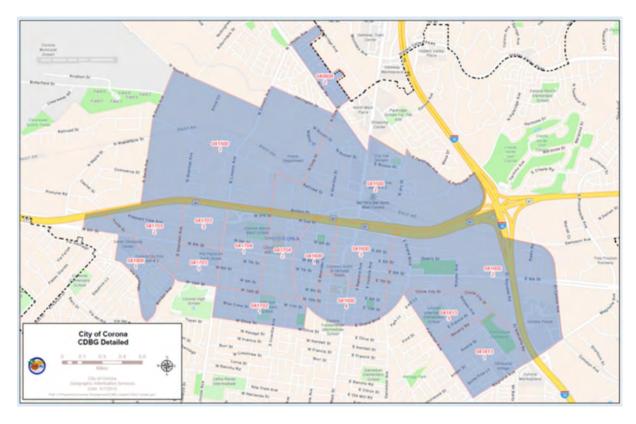


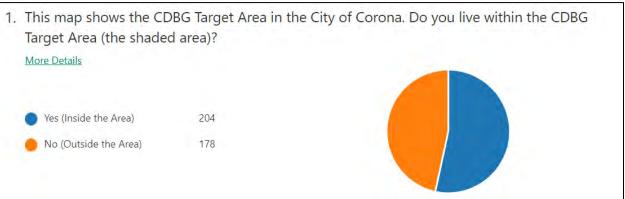
Source: FHCRC Quarterly Reports, 2014-2018.

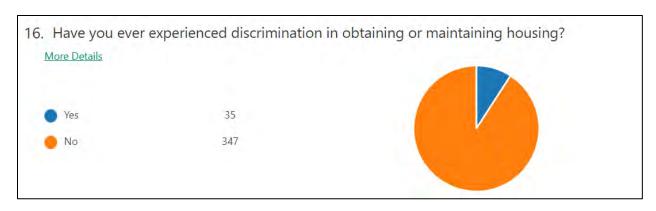
Resident Perspectives on Fair Housing

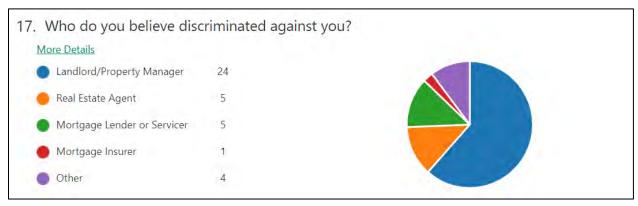
The City of Corona conducted a resident survey to obtain input from community residents regarding affordable housing, community development, economic development, and fair housing choice. The resident survey consisted of up to 25 questions that asked residents to rate the level of need in the City of Corona for additional or improved facilities, housing, infrastructure, or services, and asked residents to answer questions related to fair housing issues. The survey was published in English and in Spanish using Microsoft Forms and was also made available in paper format. Links to the surveys were publicized in the public

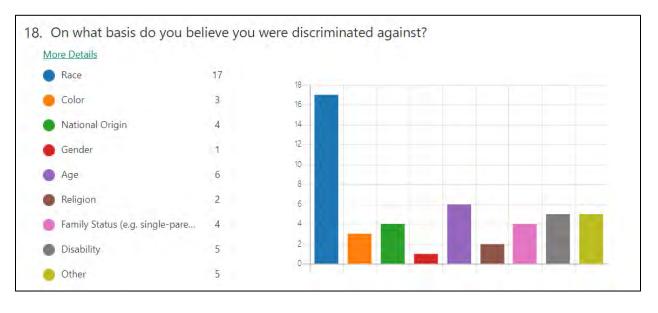
notices and flyers for community participation, through email distribution, Facebook, Twitter and by local nonprofits and housing partners. The survey was also available in paper format at several public facilities and at the two community meetings. Paper surveys and flyers were also disseminated to affordable housing complexes and to nonprofit CDBG public service providers. The survey response period was open for 42 days from October 2, 2019 to November 12, 2019. During that time, the City received 382 responses, including 322 in English and 60 in Spanish. Approximately 190 surveys were completed online and 192 surveys were completed on paper. The results of the fair housing questions are summarized below.











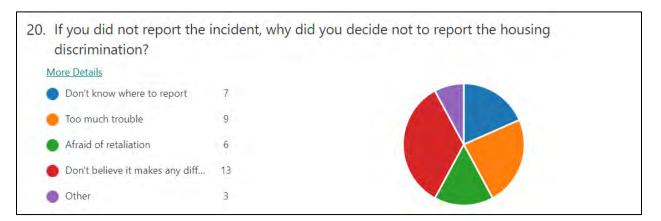
19. If you believe you have experienced housing discrimination, did you report it?

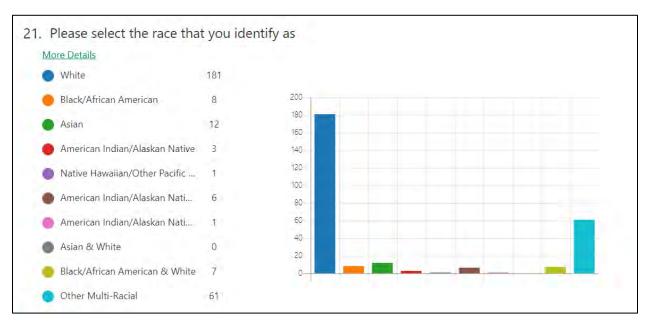
More Details

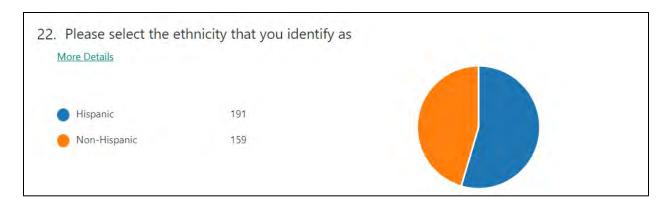
Yes

4

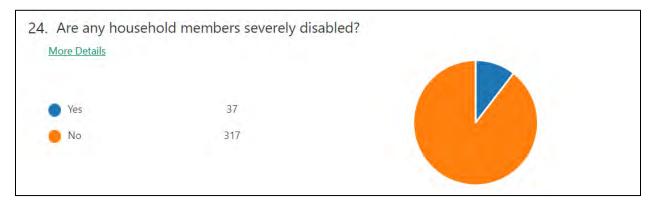
No
31











National Fair Housing Enforcement

Under the Fair Housing Act, HUD has the authority to investigate, attempt to conciliate, and, if necessary, adjudicate complaints of discrimination involving, among other things, home sales, rentals, advertising, mortgage lending and insurance, property insurance, and environmental justice. HUD also investigates complaints alleging discriminatory zoning and land use; however, these complaints are referred to the U.S. Department of Justice for enforcement.

HUD shares its authority to investigate housing discrimination complaints with state and local government agencies that participate in the Fair Housing Assistance Program (FHAP). To participate in the FHAP, a jurisdiction must demonstrate that it enforces a fair housing law that provides rights, remedies, procedures, and opportunities for judicial review that

are substantially equivalent to those provided by the federal Fair Housing Act. As of April 2019, there were 79 FHAP agencies across the country; however, the only FHAP agency in California is the State Department of Fair Employment and Housing (DFEH). In other states, county governments, municipal governments and community-based organizations are approved as FHAP agencies. HUD pays FHAP agencies for each complaint they investigate, based on the timeliness and quality of the investigation. In addition, HUD provides funding to FHAP agencies for capacity-building, training, and information systems.

A person who believes that he or she has experienced, or is about to experience, housing discrimination may file a complaint or may have a complaint filed on his or her behalf by someone else, such as a parent, child, spouse, or guardian. HUD and FHAP agencies accept complaints in person, by telephone, through the mail, and through their websites. If HUD receives a housing discrimination complaint where the alleged discriminatory act occurred within the jurisdiction of one of its FHAP agencies, HUD is required under the Fair Housing Act to refer the complaint to that agency.

If HUD determines there is reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, it issues a charge of discrimination. The parties may choose to pursue the matter in an administrative proceeding or in federal district court. If a FHAP agency finds reasonable cause to believe that a discriminatory housing practice has occurred or is about to occur, the agency or attorneys for the state or locality litigate that complaint in an administrative proceeding or in civil court.

The most recent OFHE report, FHEO Annual Report FY 2017 found a similar percentage of complaints were made based on disability across the nation as was reported in the City of Corona. 59.4 percent of all discrimination complaints made to HUD during the last fiscal year were based on the protected category of disability.

The following table (**Table V-4**) illustrates the breadth of HUD and FHAP discrimination complaints from FY 2014-2017.

Table V-4
HUD and FHAP Discrimination Complaints, 2017

	FY 2	017	FY 2	Y 2016		FY 2015		FY 2014	
	No.	%	No.	%	No.	%	No.	%	
Disability	4,865	59.4%	4,908	58.5%	4,605	55.8%	4,621	54.4%	
Race	2,132	26.0%	2,154	25.7%	2,291	27.8%	2,383	28.1%	
Familial Status	871	10.6%	882	10.5%	1,031	12.5%	1,051	12.4%	
National Origin	826	10.1%	917	10.9%	898	10.9%	1,067	12.6%	
Sex	800	9.8%	800	9.5%	915	11.1%	879	10.4%	
Religion	232	2.8%	204	2.4%	225	2.7%	223	2.6%	
Color	192	2.3%	143	1.7%	151	1.8%	146	1.7%	
Retaliation	834	10.2%	785	9.4%	832	10.1%	867	10.2%	
Number Filed:	8,186		8,385		8,246		8,489		

Source: FHEO Annual Report FY 2017, FHEO Annual Report FY 2016, FHEO Annual Report FY 2014 and 2015

https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport

Note: Percentages do not total 100 percent because complaints may contain multiple bases. Percentages are rounded to the nearest percentage point.

As shown in the table, while the total number of discrimination complaints has remained relatively flat over this period, the percentage of complaints based on discrimination due to disability has been trending upward. Familial status, the third most common basis of housing complaints, has been decreasing over the last several years. Discrimination based on familial status covers acts of discrimination against parents or guardians of a child under the age of 18, the parent's or guardian's designee, and persons who are pregnant or in the process of obtaining legal custody of a child under the age of 18.

The Department of Fair Employment and Housing (DFEH) is the State agency responsible for investigating housing discrimination complaints. The Department of Fair Employment and Housing's mission is to protect Californians from employment, housing and public accommodation discrimination, and hate violence.

In May 2003, DFEH announced a new program for mediating housing discrimination complaints in partnership with state fair housing enforcement agencies. The program provides tenants, landlords, property owners and managers through mediation in a free and timely manner. Mediation takes place within the first 30 days of filing of the complaint, often avoiding the financial and emotional costs resulting from a full DFEH investigation and potential litigation.

Table V-5 FY 2014 - 2017 Issues in HUD & FHAP Complaints

Compleint	FY 2	2014	FY 2	2015	FY 2016		FY 2017	
Complaint Issue	No.	%	No.	%	No.	%	No.	%
Refusal to Sell	154	1.8%	116	1.4%	162	1.9%	148	1.8%
Refusal to Rent	2,268	26.7%	2,317	28.1%	2,343	27.9%	2,414	29.5%
Discriminatory Terms, Conditions, Privileges, Services, & Facilities in the Rental or Sale of Property	5,869	69.1%	5,353	64.9%	5,859	69.9%	5,640	68.9%
Discriminatory Notices, Statements or Advertisements	983	11.6%	920	11.2%	877	10.5%	829	10.1%
Otherwise deny or make housing unavailable	655	7.7%	745	9.0%	798	9.5%	813	9.9%
Other Discriminatory Acts	383	4.5%	413	5.0%	475	5.7%	608	7.4%
False Denial or Representation of Availability	220	2.6%	187	2.3%	177	2.1%	181	2.2%
Failure to Permit a Reasonable Modification	181	2.1%	179	2.2%	191	2.3%	212	2.6%
Failure to Make a Reasonable Accommodation	2,676	31.5%	2,836	34.4%	3,376	40.3%	3,366	41.1%
Non-Compliance with Design and Construction Requirements	109	1.3%	77	0.9%	67	0.8%	98	1.2%
Discriminatory Financing	399	4.7%	237	2.9%	253	3.0%	183	2.2%
Steering	80	0.9%	60	0.7%	74	0.9%	74	0.9%
Discriminatory Brokerage Service	41	0.5%	55	0.7%	61	0.7%	49	0.6%
Using Ordinances to discriminate in zoning and land use	67	0.8%	39	0.5%	24	0.3%	35	0.4%
Redlining	3	0.0%	13	0.2%	9	0.1%	6	0.1%
Discriminatory Acts under Section 901 (criminal)	5	0.1%	9	0.1%	7	0.1%	14	0.2%
Refusal to Provide Insurance	2	0.0%	2	0.0%	4	0.0%	1	0.0%
Coercion, Intimidation, Threats, Interference, and Retaliation	1,820	21.4%	1,606	19.5%	1,424	17.0%	1,456	17.8%
Blockbusting	5	0.1%	11	0.1%	8	0.1%	7	0.1%
Failure to meet senior housing exemption criteria	0	0.0%	0	0.0%	0	0.0%	3	0.0%
Number of Complaints Filed	8,489		8,246		8,385		8,186	

Source: FHEO Annual Report FY 2017, FHEO Annual Report FY 2016, FHEO Annual Report FY 2014 and 2015;

https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport

Note: Percentages do not total 100 percent because complaints may contain multiple bases. Percentages are rounded to the nearest percentage point

Table V-6 FY 2010 - 2013 Issues in HUD & FHAP Complaints

Commission Louis	FY 2	010	FY 2	2011	FY 2012		FY 2013	
Complaint Issue	No.	%	No.	%	No.	%	No.	%
Refusal to Sell	205	2%	142	2%	190	2%	170	2%
Refusal to Rent	2,405	24%	2,239	24%	2,317	26%	2,273	27%
Discriminatory Terms, Conditions, Privileges, Services, & Facilities in the Rental or Sale of Property	5,959	59%	5,674	61%	5,516	63%	5,713	68%
Discriminatory Notices, Statements or Advertisements	937	9%	784	8%	936	11%	986	12%
False Denial or Representation of Availability	256	3%	250	3%	237	3%	246	3%
Failure to Permit a Reasonable Modification	203	2%	207	2%	204	2%	194	2%
Failure to Make a Reasonable Accommodation	2,556	25%	2,408	26%	2,487	28%	2,543	30%
Non-Compliance with Design and Construction Requirements	169	2%	90	1%	106	1%	114	1%
Discriminatory Financing	511	5%	442	5%	383	4%	433	5%
Steering	84	1%	62	1%	81	1%	80	1%
Redlining	6	<0.5%	2	<0.5%	11	<0.5%	5	<0.5%
Refusal to Provide Insurance	2	<0.5%	0	0%	4	<0.5%	6	<0.5%
Coercion, Intimidation, Threats, Interference, and Retaliation	1,478	15%	1,650	18%	1,913	22%	1,884	23%
Number of Complaints Filed	10,155		9,354		8,818		8,368	

Source: FHEO Annual Report on Hair Housing FY 2012-2013

https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport

Note: Percentages do not total 100 percent because complaints may contain multiple bases. Percentages are rounded to the nearest percentage point

Review of **Tables V-5** and **V-6** can reveal trends in housing as they combine eight years of HUD data. First, the total number of complaints made to HUD and state fair housing

agencies, such as DFEH, fell from 10,155 total complaints in Fiscal Year 2010 to 8,186 total complaints in Fiscal Year 2017, representing a 19 percent decrease. However, those decreases in discrimination complaints were not evenly dispersed amongst all categories over that eight-year period. In fact, discrimination allegations based on a failure to make a reasonable accommodation to policies, rules or procedures rose by 76 percent over that period. The percentage of complaints based on a failure to make a reasonable accommodation as a percentage of the total number of complaints filed rose from 25 percent of all complaints filed in FY2010 to 41.1 percent of all complaints filed in FY2017.

Hate Crimes

Hate crimes are violent acts against people, property, or organizations because of the group to which they belong or identify with. The Federal Fair Housing Act makes it illegal to threaten, harass, intimidate, or act violently toward a person who has exercised their right to free housing choice. Some examples include threats made in person, writing or by telephone, vandalism of the home or property, or unsuccessful attempts at any of these. Again, a comparison between **Tables V-5** and **V-6** reveal some interesting information about possible hate crimes related to housing. Beginning in FY2010, the total number of complaints made to HUD and state agencies based on coercion, intimidation, threats, interference, or retaliation totaled 1,478 before peaking at 1,913 complaints in FY2012 and did not return to pre-2010 levels until 2016. While the data does not indicate the reason for this spike in complaints based on coercion, intimidation, threats, interference, and retaliation, the data does suggest that discrimination most closely associated with hate crimes may be on the rise in housing discrimination, as this category of complaint still represents 17.8 percent of all complaints filed for FY 2017.

Table V-7 summarizes the hate crime incidents by bias motivation as reported by the FBI1 for calendar years 2012-2016. It is important to note that not all incidents of coercion, intimidation, threats, interference, or retaliation rise to the level of a hate crime, and even with those incidents that do, not all such incidents are reported to the police.

Table V-7
Hate Crime Incidents Reported to the FBI in Corona 2008 – 2017

Calendar Year	Race / Ethnicity / Ancestry	Religion	Sexual Orientation	Disability	Gender	Total
2017	1	0	1	0	0	2
2016	0	0	0	0	0	0
2015	0	0	0	0	0	0
2014	0	0	0	0	0	0
2013	1	0	0	0	0	1
2012	2	0	1	0	-	3
2011	1	0	0	0	-	1
2010	2	0	0	0	-	2
2009	2	1	2	0	-	5
2008	4	1	1	0	-	6
Total:	13	2	5	0	0	20

Source: FBI Hate Crime Incidents by State and Agency, 2008-12.

https://www.fbi.gov/services/cjis/ucr/publications#Hate-Crime%20Statistics.

¹ FBI Hate Crime Incidents by State and Agency, 2008-2017.

In Corona, there were a total of 20 hate crimes reported to the FBI during 2008 to 2017, with 17 of those reported as occurring between 2008-2013. The most prevalent hate crime bias motivation reported was race (note that ethnicity and ancestry were combined with race in the first column of **Table V-7** to match UCR reporting beginning in 2014. The relatively low occurrence of hate crimes within the community in recent years indicates that hate-motivation does not appear to coincide with incidences of housing discrimination in Corona and does not indicate an impediment to fair housing choice.

Fair Housing Legal Status

In the last five (5) fiscal years, no cases were filed in a court of competent jurisdiction by the FHCRC to enforce fair housing laws. FHCRC was successful in addressing the fair housing cases that were investigated on behalf of residents of the City of Corona during this time period; therefore, there is no litigation to report.

Conclusions and Recommendations

Previous chapters of this A.I. examined changes in Corona, analyzed public policies for impediments to fair housing and documented fair housing opportunity in Corona. This chapter recommends actions to improve housing opportunity in Corona. **Table VI-1** at the end of this chapter summarizes the recommendations to address the impediments to fair housing choice that have been identified, including an implementation schedule.

Prior-Identified Impediments Remaining as Part of the 2020 A.I.

The 2015-19 City of Corona A.I. identified two (2) impediments to fair housing choice, both of which are carried over for the 2020-2024 planning period and are summarized below.

1. 2015-2019 Impediment No. 1: Lack of Access to Home Improvement Financing. The inability to fund home rehabilitation was identified in the A.I. as an impediment to lower and moderate-income households and Hispanic households. The CDBG target areas are in the northern and central portions of the City, where much of the City's older housing stock is located. These areas have a higher concentration of lower and moderate-income persons and minorities than the rest of the City. Based on Home Mortgage Disclosure Act (HMDA) data, these groups are more likely to be denied private home improvement loans.

As of 2020, over 80 percent of the housing stock is at least 20 years old. A general rule of thumb in the housing industry is that homes built more than 30 years ago begin to require major investments to maintain quality. Moreover, 26 percent of the housing stock is over 40 years old.

To address this need, in 2012, the City of Corona revamped its own Residential Rehabilitation Program through CDBG and HOME Investment Partnerships funds. The Residential Rehabilitation Program is available to households earning less than 80 percent of area median income. This program provides forgivable loans of up to \$25,000 per owner-occupied dwelling unit to address critical home improvement needs such as the remediation of code violations, heating and air conditioning, exterior or interior paint, water heater replacement, roofing, plumbing, electrical, kitchen and bathroom facilities, termite eradication/repair and accessibility improvements.

According to the FY 2018-19 Consolidated Annual Performance and Evaluation Report (CAPER), the City has completed 63 rehabilitation projects since July 2015. As a result of these efforts, 63 households now benefit from living in housing units that are not only compliant with local codes and property standards, but that are also affordable to the household.

Recommendation: It is recommended that the City to continue to offer the Residential Rehabilitation Program to increase opportunities for low and moderate-

income households to improve their homes. The City should also continue to implement a robust community outreach effort to ensure that available HOME and CDBG resources are deployed quickly to maintain decent housing. As noted in the 2013-21 Housing Element, the City's objective is to assist 120 households during the planning period, with an average of 15 households annually. From 2013 to 2015, 21 rehabilitation projects were completed. An additional 36 projects are needed during 2019-2020 and 2020-2021 to meet the Housing Element goal.

2. Impediment No. 2 Limited Access to Home Purchase Loans. African American and Hispanic households have limited access to conventional home purchase loans due to disproportionate denial rates compared to households of other racial groups. According to the 2020 A.I., of home purchase loan applicants earning less than 80 percent of Area Median Income (AMI), Hispanic households (66.67 percent) and African American households (50 percent) had disproportionately lower approval rates relative to the overall approval rate of 89.84 percent. This was also the case in previous evaluations of Home Mortgage Disclosure Act data evaluated in the 2010 and 2015 A.I. documents.

Differences in approval rates for home loan applications among minority groups do not necessarily reflect discriminatory practices. Differences could be due to credit scores, employment history, knowledge of the lending process, debt-income ratio, or other factors. Nonetheless, the disproportionately lower home purchase loan approval rates for Hispanics and African Americans could be subject to additional inquiry and examination, and affirmative efforts appear necessary to address this disparity.

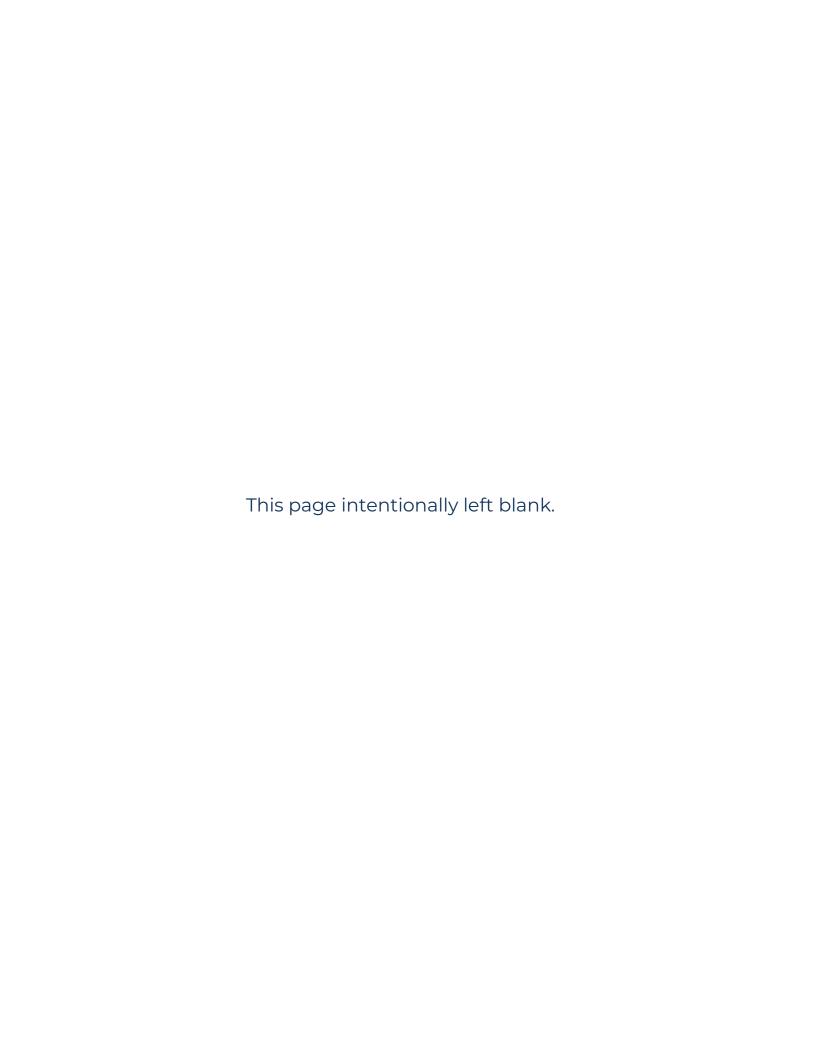
Recommendation: It is recommended that the City work with its fair housing service provider to continue to monitor HMDA data to ensure that discrimination practices such as loan denial on the basis of race and ethnicity may be detected. In addition, it is recommended that the fair housing service provider continue to provide homeownership workshops to low- and moderate-income people, including minorities and members of protected classes, during the five-year period of the 2020 planning period.

New Impediment to Fair Housing Choice

There are no new impediments to fair housing choice. The City actively works with developers, non-profit organizations, and the community to improve policies and enhance community and housing programs.

Table VI-1 Fair Housing Plan Recommendations

Imp	ediment	Recommendations	Lead Agency	Timeframe
Impediment No. 1	Lack of Access to Home Improvement Financing	It is recommended that the City to continue to offer the Residential Rehabilitation Program to increase opportunities for low and moderate-income households to improve their homes. The City should also continue to implement a robust community outreach effort to ensure that available HOME and CDBG resources are deployed quickly to maintain decent housing. As noted in the 2013-21 Housing Element, the City's objective is to assist 120 households during the planning period, with an average of 15 households annually. From 2013 to 2015, 21 rehabilitation projects were completed. An additional 36 projects are needed during 2019-2020 and 2020-2021 to meet the Housing Element goal.	Corona Community Development Department	July 1, 2020 – June 30, 2025
Impediment No. 2	Limited Access to Home Purchase Loans	It is recommended that the City work with its fair housing service provider to continue to monitor HMDA data to ensure that discrimination practices such as loan denial on the basis of race and ethnicity may be detected. Additionally, it is recommended that the fair housing service provider continue to provide homeownership workshops to low- and moderate-income people, including minorities and members of protected classes, during the five-year period of the 2020 planning period.	Corona Community Development Department and Fair Housing Service Provider	July 1, 2020 – June 30, 2025



Appendix "A"

Signature Page

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

Jacob Ellis

City Manager

Date