



# Analysis of Impediments to Fair Housing Choice

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Adopted - April 15, 2015

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## A. 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 Laws*

The Civil Rights Act of 1968 and Fair Housing Amendments Act of 1988<sup>1</sup> are the primary federal laws that prohibit discrimination in the sale, rental, lease, or negotiation for property based on race, color, religion, age, sex, or national origin. Whereas the Civil Rights Act contained provisions protecting people from housing discrimination, amendments enacted in 1988 extended protection to families with children and people with disabilities. The Fair Housing Act also sets accessibility standards for new multi-family units and requires "reasonable accommodations" for people with disabilities.

The State of California has enacted a number of statutes that mirror and, in certain cases, extend fair housing protections in federal law. The Unruh Civil Rights Act of 1959<sup>2</sup> 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 1963<sup>3</sup> is the primary state law, which prohibits discrimination in the sale, rental, lease negotiation, or financing of housing based on race, color, religion, age, 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 Unruh 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, genetic information, marital status, medical condition, 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.

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<sup>1</sup>42 U.S. Code §§ 3601 et. seq

<sup>2</sup>California Civil Code, §§ 51 and 52

<sup>3</sup>California Government Code §§ 12900-12906

### *Defining Fair Housing and Impediments*

In light of fair housing legislation passed at the federal and state levels as well as 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, ancestry, national origin, religion, age, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor.*

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

*Any actions, omissions, or decisions taken because of age, race, color, ancestry, national origin, religion, age, sex, disability, marital status, familial status, source of income, sexual orientation, 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 age, race, color, ancestry, national origin, religion, age, sex, disability, marital status, familial status, source of income, sexual orientation or any other arbitrary factor.*

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

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

The City of Corona is dedicated to providing fair housing opportunities to all residents and ensuring compliance with all applicable laws.

## **B. 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 (5) 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 March 16, 2011. This A.I. is a comprehensive update of the 2010-14 A.I.

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.
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 2015-2019 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 2015-19 A.I. adheres to the City's Citizen Participation Plan that was adopted November 20, 2013.

To solicit public participation in the Analysis of Impediments to Fair Housing study, the City held a Community Meeting on December 15, 2014 at the Corona Public Library. 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 Meeting. 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 needs assessment surveys to all persons in attendance at the community meeting to gather information on what they perceive are the most pressing needs of their community. The survey was also available electronically on the City website.

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 Press Enterprise newspaper and posted at City Hall (City Clerk's Office and Administrative Services 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 Administrative Services Department, the Corona Public Library and on the City website.

The City Council conducted a public hearing and then formally considered and adopted the Corona Analysis of Impediments on April 15, 2015. No public comments were received on the Draft A.I. during the public review period or at the public hearing.

### C. 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 2010-14 A.I.:

**2010-14 Impediment No. 1: Lack of Affordable Ownership and Rental Housing.** A lack of affordable rental and ownership housing is a barrier to the City's lower and moderate income households. Noted in the 2010-14 A.I., only 3.1 percent of the City's housing units are publically subsidized as affordable housing, whereas as 19 Percent of the City's households qualified as lower to moderate income as of the adoption of the 2010-14 A.I.

#### **2015 Status: Impediment Removed.**

**Background:** The City continues to make efforts to pursue the expansion of both affordable rental and ownership housing.

The City conducts annual monitoring and persistently pursues funding for long-term preservation and opportunities of affordable rental housing. In 2013, the City worked with nonprofit housing developers to rehabilitate 12 affordable rental units at Mission Apartments (926 West Fifth Street). Also one manufactured home on E Street was newly constructed during the same year. In 2015, Citrus Circle Apartments, a 100 percent affordable tax credit development will open for initial leasing of 61 units. Additionally, the City is working with developers on future projects of this size and affordability.

The City also identifies and analyzes inventory that may be put at risk of losing affordability controls. With total of 269 units in Corona of at risk of losing their affordability controls prior to December 2023, the City's objective is to either retain or replace as low income housing all 269 at-risk units. The City makes financial resources available through CDBG, HOME, federal, state, and local sources to preserve units at risk of conversion to market rate.

Additionally, the City supports the efforts of the Riverside County Housing Authority to provide subsidized rental opportunities to-low and moderate-income households. In 2013, the Riverside County Housing Authority had approximately 14,600 households on the waiting list for Section 8 Housing Choice Vouchers. 350 Housing Choice Vouchers were held by Corona households. Out of the 350 vouchers, 225 of these households had at least one elderly person and 214 of these households had at least one disabled individual.

**Removal from the A.I.:** The lack of affordable ownership and rental housing in the marketplace is a barrier to affordable housing; however, the existence of the market condition does not meet the established threshold definition of an Impediment to Fair Housing Choice because the market condition is not the result of actions, omission or decisions which restrict housing choices or the availability of housing choices for one or more protected classes.

**2010-14 Impediment No. 2: Lack of Access to Home Improvement Financing.** The inability to fund home rehabilitation was identified in the 2010-14 A.I. as an impediment to lower and moderate income households and Hispanic households. According to the 2010-14 A.I., the CDBG target areas are located 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 Hispanic persons 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.

**2015 Status: In Progress.**

**Background:** As of 2015, approximately 50 Percent of the housing stock is at least 25 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.

While a number of home improvement programs are needed, the City is making progress towards meeting its goals. 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 2013-14 Consolidated Annual Performance and Evaluation Report (CAPER), the City committed HOME funds to eligible Residential Rehabilitation Program activities. As a result of these efforts, funds supported six (6) activities for a total of \$335,008. Each of these activities was completed by the second quarter of the 2014-15 program year and an additional six (6) rehabilitation activities underway as of June 30, 2014. An additional 22 rehabilitation projects are expected to be completed during the 2014-2015 program year to maintain pace with the five-year goal established in the 2010-14 Consolidated Plan.

**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.

**2010-14 Impediment No. 3: Limited Access to Home Purchase Loans.** Black 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 2010-14 A.I., Hispanic households comprised 40 Percent of the City's population, but they only represented 21 percent (827 out of 3,981) of conventional home purchase loan applicants in 2008 and had the second highest denial rate (27 Percent). Black applicants, which represented 3 percent of applicants (111 out of 3,981), had the same denial rate at Hispanic households. American Indians had the highest denial rate (50 percent), however only 4 out of 3,981 applicants were American Indian thus this is not statistically significant. The denial rate for conventional home purchase loan applications in 2008 was nearly twice as high for Hispanic and Black households compared to White and Asian and Pacific Islander households, which had denial rates of 16 percent and 15 percent, respectively.

**2015 Status: Unresolved.**

**Background:** According to the 2007-11 American Community Survey (ACS), the Hispanic population grew slightly, comprising 42.8 percent of the City's population. However, the number of Hispanics that applied for conventional home purchase loans decreased. Out of the 2,248 conventional home purchase loan applications in 2012, only 11.6 percent were Hispanics. While Hispanics still had one of the lowest approval rates amongst groups that applied for all home loans, their approval rate did improve. In 2012, only 11.5 percent of Hispanic applicants were denied of a conventional home purchase loan an improvement from the 27.0 percent denial rate in 2008 according to the Home Mortgage Disclosure Act (HMDA) data.

African Americans represented 5.4 percent of the City's population, and only 1.5 percent applied for conventional home purchase loans. The denial rate of 23.5 percent is relatively similar what it was in 2008.

Differences in approval rates for home loan applications amongst both 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 dramatic drop in the number of conventional home purchase loan applications for Hispanics and African Americans could be subject to additional inquiry and examination.

**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.

**2010-14 Impediment No. 4: Public Policies and Programs Affecting Housing Development.**

As discussed in the 2010-14 A.I., the City's development standards for secondary units, conversion of motels to Single Room Occupancies ("SROs"), homeless shelters, supportive housing, transitional housing, and housing for persons with disabilities were an impediment to lower and moderate income households and special needs populations such as the homeless and disabled.

**2015 Status: Resolved.**

**Background:** The City revised its Zoning Ordinance in July 2013 to accommodate single room occupancies, emergency shelters, supportive housing, and transitional housing in accordance with State law.

The Zoning Ordinance includes new language to allow emergency shelters by right and subject to ministerial review within the M-1 (light manufacturing) zone. The City also revised the Zoning Ordinance 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 now consistent with definitions for these facilities found in the California Health and Safety Code Section 50675. Additionally, transitional and supportive housing facilities are subject to the same development standards and permit processing criteria required for single-family and multi-family uses.

Current and proposed planning policies and zoning regulations have mitigated potential constraints to the availability of housing for persons with disabilities. The City analyzed its zoning ordinance and procedures to ensure that it is providing flexibility in, and not constraining the development of, housing for persons with disabilities. For instance, the Zoning Ordinance regulates a variety of uses that provide 24-hour care to persons with disabilities, including state-licensed residential care facilities. The City revised its Zoning Ordinance to allow all such facilities that serve six or fewer persons by right wherever single- or multi-family housing is allowed, pursuant to the California Lanterman Developmental Disabilities Services Act. Care facilities that provide 24-hour care to seven or more disabled persons are now allowed in all zones that permit residential uses subject to a Conditional Use Permit, consistent with state law.

Additionally, the City eliminated a prior restriction on renting rooms to no more than four boarders in single-family residences within the A (agricultural) and A-14.4 zones, which could have constrained opportunities for farm worker housing.

**D. New Impediments to Fair Housing Choice and Recommendations**

No new impediments to fair housing choice were identified for the 2015 A.I.. The City actively works with developers, non-profit organizations, and the community to improve policies and enhance community and housing programs.

**A. Historical Profile**

The City of Corona (City) is located in western Riverside County, near the convergence of Los Angeles, Orange, and Riverside Counties. Incorporated in 1896, Corona’s heritage spans more than a century. Its name, Spanish for “crown”, honors the City’s circular Grand Boulevard. Founded at the height of the Southern California citrus boom and once serving as the only significant pass through the Santa Ana Mountains, settlers were attracted to the region to harvest citrus. This was a major driver of Corona’s economy from the early 1900s through the 1960s. After the Riverside Freeway (Highway 91) was constructed through Corona in 1962, the City became increasingly urban. Housing and commercial development supplanted citrus orchards from the 1960s to 1980s. The City has experienced much growth over the past 30 years and serves as a major urban and employment center for the region.

Corona’s population has almost doubled from 76,095 in 1990 to 152,111 in 2011. Corona’s housing stock is expanding consistent with the city’s position at the leading edge of Southern California’s fastest-growing region.

**B. Demographic Profile**

*Population Trends*

The City’s population had a growth rate of 21.7 percent from 2000 to 2011 (**Table II-1**). When compared to other neighboring cities in Riverside County, such as Norco, Moreno Valley and Riverside, the City’s population is growing at a similar rate. Riverside County’s population increased by 39.4 percent in the last decade.

**Table II-1  
Population Growth Trends, 1990-2011**

Community	1990	2000	2011	Percent Change	
				90-00	00-11
Corona	76,095	124,966	152,111	+64.2%	+21.7%
Norco	23,302	24,157	27,131	+3.7%	+12.3%
Moreno Valley	118,779	142,381	190,977	+19.9%	+34.1%
City of Riverside	226,505	255,166	303,569	+12.7%	+19.0%
County of Riverside	1,170,413	1,545,387	2,154,844	+32.0%	+39.4%

Source: U.S. Census, 1990, 2000, and ACS, 2007-11.

*Age and Sex Characteristics*

The age distribution of Corona residents has been fairly consistent between 2000 and 2011, other than with a slight percentage increase in the older population from ages 45 and over. According to the 2011 ACS, Corona is an older city with a median age of 32 years. A total of 29.6 percent of City residents are over 55 compared to 21.3 percent for Riverside County. That is 1.5 years more than the median age of Riverside County (33.5). The largest age group remains young adults ages 5 to 14, who comprise 17.1 percent of the population. (Table II-2).

**Table II-2  
Age and Sex Characteristics and Trends**

Age Group	2000		2011		Percent Change in Persons
	Persons	Percent of Total	Persons	Percent of Total	
< 5	12,249	9.8%	11,316	7.4%	-7.6%
5-14	23,800	19.0%	25,934	17.1%	+8.9%
15-24	16,752	13.4%	24,303	16.0%	+45.1%
25-34	21,655	17.3%	19,838	13.0%	-8.4%
35-44	22,209	17.8%	25,643	16.9%	+15.5%
45-54	13,852	11.1%	21,220	14.0%	+53.2%
55-64	7,160	5.7%	12,669	8.3%	+76.9%
65+	7,289	5.8%	11,188	7.3%	+53.5%
<b>Total:</b>	<b>124,966</b>	<b>100.0%</b>	<b>152,111</b>	<b>100.0%</b>	<b>+21.7%</b>
<b>Male</b>	61,849	49.5%	75,989	50.0%	+22.9%
<b>Female</b>	63,117	50.5%	76,122	50.0%	+20.6%

Source: U.S. Census, 2000 and ACS, 2007-11.

*Race and Ethnicity*

From 2000 to 2011, U.S. Census and ACS respondents identifying themselves as “White” slightly increased 0.7 percent, while those identified as “Hispanic” in terms of ethnicity increased by 46.0 percent. Asian and Pacific Islander was the largest race category that increased by 62.8 percent. According to the 2011 ACS, people of Hispanic or Latino origin comprise 42.8 percent of the population. Additionally the number of Asian/Pacific Islander increased by 5,802 a 62.8 percent increase that shows the city becoming more diverse. (Table II-3).

**Table II-3**  
**Race and Ethnicity Trends**

Race	2000 Census		2011 Census		2000-2011 Change	
	#	%	#	%	#	%
White (Non-Hispanic)	58,784	47.0%	59,182	38.8%	+398	+0.7%
Black/African American	7,704	6.2%	8,223	5.4%	+519	+6.7%
Native American	490	0.4%	424	0.3%	-66	-13.5%
Asian/Pacific Islander	9,239	7.4%	15,041	9.9%	+5,802	+62.8%
Some other race/Multiracial	4,180	3.3%	4,152	2.8%	-28	-0.7%
<b>Total</b>	<b>124,966</b>	<b>100.0%</b>	<b>152,111</b>	<b>100.0%</b>	<b>+27,145</b>	<b>+21.7%</b>
Ethnicity	2000 Census		2011 Census		2000-2010 Change	
	#	%	#	%	#	%
Hispanic or Latino	44,569	35.7%	65,089	42.8%	+20,520	+46.0%
Not Hispanic or Latino	80,397	64.3%	87,022	57.2%	+6,625	+8.2%

Source: U.S. Census, 2000 and ACS, 2007-11.

*Racial Integration*

According to the 2011 ACS, the three (3) identified largest racial makeup of the City was White persons (38.8 percent), Asian/Pacific Islanders (9.9 percent), and Black/African Americans (5.4 percent). In addition, a large number of people identify themselves as being of Hispanic or Latino ethnicity (42.8 percent). Based on this information, it would appear that the community continues to become more integrated over time.

*Household Profile*

Information on household characteristics aids in understanding changing housing needs. The Census Bureau 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. Person living in retirement or convalescent homes, dormitories, or other group living situations are not considered households.

**Table II-4** compares various household trends in Corona. Reflective of the age distribution of the City population, 80.4 percent of the households were families at the time of the 2000 Census. In the 2011 ACS, the proportion of family households increased slightly to 81.7 percent. Perhaps the most significant changes since 2000 is the percent increase in the

number of married family households without children (24.2 percent increase) and the number of other family households (26.3 percent increase). Other family households include a family with a male maintaining a household with no wife present, or vice versa.

Household size identifies sources of population growth and/or overcrowding in individual housing units. A city's average household size will increase over time with an increase in larger families or may decline where the population is aging. The data in **Table II-4** shows that the City's average household size increased slightly from 3.3 to 3.5 persons per household. This modest increase is attributable to the 6.1 percent population increase.

**Table II-4  
Household Characteristics and Trends**

Household Type	2000		2011		Percent Change
	Number	Percent	Number	Percent	
<b>Family Households</b>					
- Married With Children	15,017	39.7%	16,293	37.4%	+8.5%
- Married Without Children	9,139	24.2%	11,352	26.1%	+24.2%
- Other Families	6,235	16.5%	7,876	18.2%	+26.3%
<b>Non-Family Households</b>					
- Single Persons	5,466	14.4%	5,973	13.7%	+9.3%
- Non-families	1,982	5.2%	2,015	4.6%	+1.7%
<b>Total</b>	<b>37,839</b>	<b>100.0%</b>	<b>43,509</b>	<b>100.0%</b>	<b>+15.0%</b>
<b>Average Household Size</b>	<b>3.3</b>		<b>3.5</b>		<b>+6.1%</b>

Source: U.S. Census, 2000 and ACS, 2007-11.

**C. Income Profile**

In evaluating household income, households are oftentimes grouped into different income groups in relation to the County Median Family Income (MFI) and adjusted for household size. This provides a useful comparison of changes in the City’s household income distribution over time. The five (5) income 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)

The data in **Table II-5** shows more households are earning higher incomes in 2011 than in 2000.

**Table II-5  
Number of Households by Income Level**

Household Income Level		2000	2011	Percent Change
Extremely Low	Less than \$10,000	1,788	1,353	-24.3%
	\$10,000 to \$14,999	1,178	1,152	-2.2%
	\$15,000 to \$24,999	3,188	2,601	-18.4%
Low	\$25,000 to \$34,999	3,150	3,116	-1.1%
	\$35,000 to \$49,999	6,194	4,649	-24.9%
Moderate	\$50,000 to \$74,999	8,817	7,392	-16.2%
Middle	\$75,000 to \$99,999	6,941	6,773	-2.4%
Upper	\$100,000 to \$149,999	4,954	9,308	+87.9%
	\$150,000 to \$199,999	1,057	4,582	+333.5%
	\$200,000 or more	572	2,583	+351.6%
<b>Total:</b>		<b>37,839</b>	<b>43,509</b>	<b>+15.0%</b>

Source: U.S. Census, 2000 and ACS, 2009-11.

Table II-6 summarizes the household income characteristics of Corona residents.

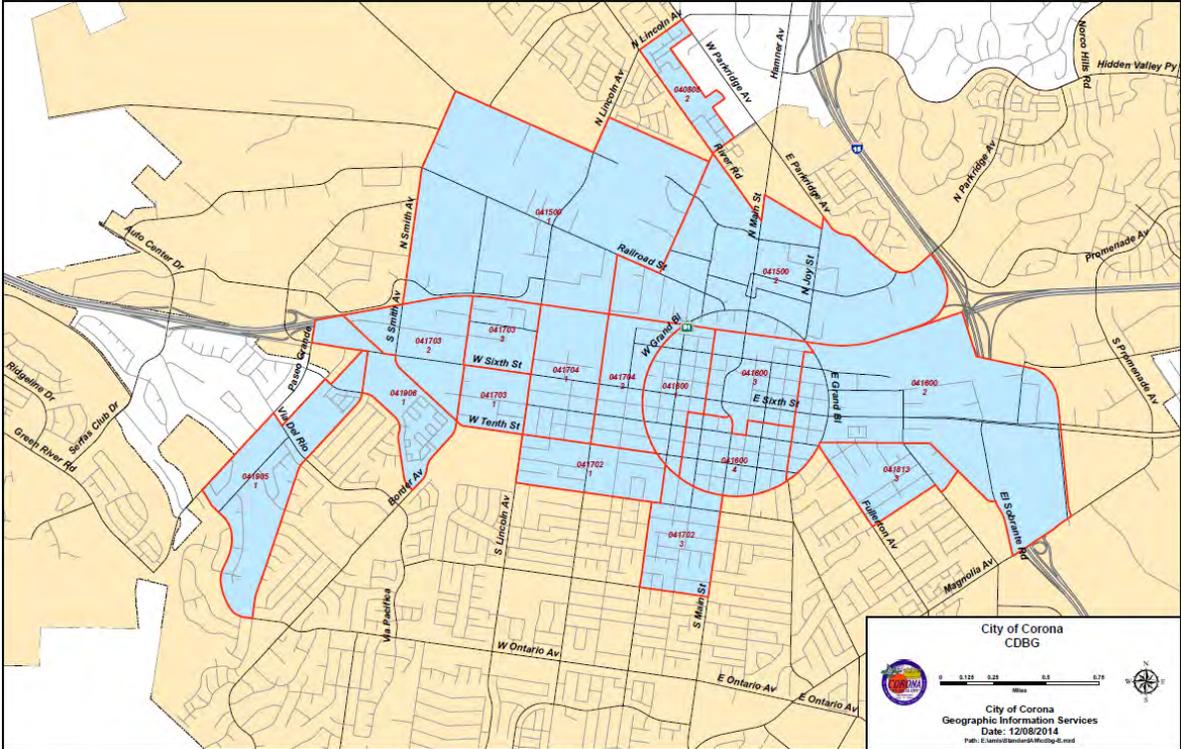
**Table II-6  
Household Income Characteristics**

Household Type	Percent of Households by Income level			
	Total Low/Mod (0-80% MFI)	Extremely Low (0-30% MFI)	Low (31-50% MFI)	Moderate (51-80% MFI)
Elderly	3,714	1,035	1,030	1,649
Small Families	5,285	1,165	1,475	2,645
Large Families	2,475	425	755	1,295
All Others	3,655	950	1,145	1,560

Source: Comprehensive Housing Affordability Strategy (CHAS), 2007-11.

Map 1 illustrates areas within Corona that are considered to be low-moderate income neighborhoods. The definition of an area of concentration for low and moderate-income households is governed by federal regulations for the Community Development Block Grant Program. Low and moderate-income area is defined as a block group or census tract with 51 percent or more residents earning income less than 80 percent of the County median family income. The north central portion of Corona is largely a low-moderate income area.

**Map 1  
Low- and Moderate Income Areas**



Source: City of Corona, 2014.

**D. Employment Profile**

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

*Major Employers*

Of Corona’s top 10 employers in 2013, three (3) are major medical companies such as Kaiser Permanente, Corona Regional Medical Center and Watson Laboratories, Inc. Corona’s excellent access to the North Main Corona Metrolink Station, and the two major freeways (Interstate 91 and 15) have also helped Corona establish itself in a diversified mix of distribution, service, and retail businesses. **Table II-7** lists the major employers in Corona.

**Table II-7  
Major Employers in Corona**

Name of Business or Institution	Number of Employees	% of Total City Employment	Type of Business
Corona-Norco Unified School District	2,459	2.8%	Education
Corona Regional Medical Center	1,100	1.3%	Medical
Kaiser Permanente	825	0.9%	Medical
City of Corona	801	0.9%	Government
Fender Guitar	800	0.9%	Music
All American Asphalt	700	0.8%	Material/Construction
Actavis	626	0.7%	Medical/Pharmaceutical
CIRCOR	600	0.7%	Aerospace
Monster Energy	475	0.5%	Beverage
TWR Framing Enterprises	465	0.5%	Construction
<b>Total City Employment</b>	<b>8,851</b>	<b>10.1%</b>	

Source: Corona Comprehensive Annual Financial Report, Fiscal year ended June 30, 2014.

*Jobs Held by Residents*

According to the 2011 ACS, 60 percent of residents over the age of 16 were employed. An estimated 11.6 percent were unemployed in 2011. **Table II-8** shows the occupation of residents, number of residents in each category and percentage employed by each occupation. Of particular note is the high proportion of managerial/professional and sales/office occupations held by Corona residents.

**Table II-8  
Occupation Characteristics**

Occupations of Residents	Number of Residents	% Employed by Occupation
Management, business, science, and arts	23,446	34.3%
Service	10,028	14.7%
Sales and office	18,689	27.4%
Natural resources, construction, and maintenance	6,558	9.6%
Production, transportation, and material moving	9,531	14.0%

Source: ACS, 2009-11.

According to the 2011 ACS, Corona's journey to work patterns closely mirrored the patterns evidenced in the County of Riverside as a whole. In Corona, the majority of employed residents (78.4 percent) drive alone to work. 12.6 percent of all residents carpooled to work and only 1.8 percent used public transportation.

### E. Housing Profile

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

#### *Available Housing Units*

Reflecting the population growth between 2000 and 2011, Corona's housing inventory expanded 17.7 percent, less than the 35.9 percent increase Countywide. Nearby cities experienced similar increases in housing units, with the exception of Moreno Valley where new building is kept pace with the Countywide growth rate.

As discussed later, the predominant housing type in Corona remained single-family detached homes accounting for 70.5 percent of the City's housing stock in 2011. **Table II-9** shows housing growth trends in Corona as compared to nearby jurisdictions and the County as a whole.

**Table II-9  
Housing Growth Trends, 2000-2011 (Housing Units)**

Community	2000	2011	Percent Change
Corona	39,271	46,225	+17.7%
Moreno Valley	41,431	54,154	+30.7%
Chino Hills	20,414	23,323	+14.3%
Riverside	85,974	99,331	+15.5%
Norco	6,277	7,665	+22.1%
Riverside County	584,674	794,478	+35.9%

Source: U.S. Census, 2000 and ACS, 2007-11.

*Housing Characteristics*

According to the 2011 ACS, Corona has 43,509 occupied housing units. Of these units, 69.7 percent are owner-occupied and 30.3 percent are renter occupied. **Table II-10** describes the City's housing inventory in 2011.

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. In 2011, the City's homeowner vacancy rate is 2.8 percent and the rental vacancy rate is 5.9 percent. This indicates there is a slight excess of owner-occupied units in Corona.

**Table II-10**  
**Housing Supply: Units in Structure by Tenure**

Number of Units in Structure	Total Units		Owner			Renter		
	#	%	#	Share of Category	% of Total	#	Share of Category	% of Total
1, detached or attached	33,279	76.4%	27,912	92.1%	83.9%	5,367	40.7%	16.1%
2 to 9 units	3,556	8.2%	575	1.9%	16.2%	2,981	22.6%	83.8%
10 or more units	5,157	11.9%	552	1.8%	10.7%	4,605	34.9%	89.3%
Mobile home and all other types of units	1,517	3.5%	1,277	4.2%	84.2%	240	1.8%	15.8%
<b>Total:</b>	<b>43,509</b>	<b>100.0%</b>	<b>30,316</b>	<b>69.7%</b>		<b>13,193</b>	<b>30.3%</b>	

Source: ACS, 2007-11.

*Housing Conditions*

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.

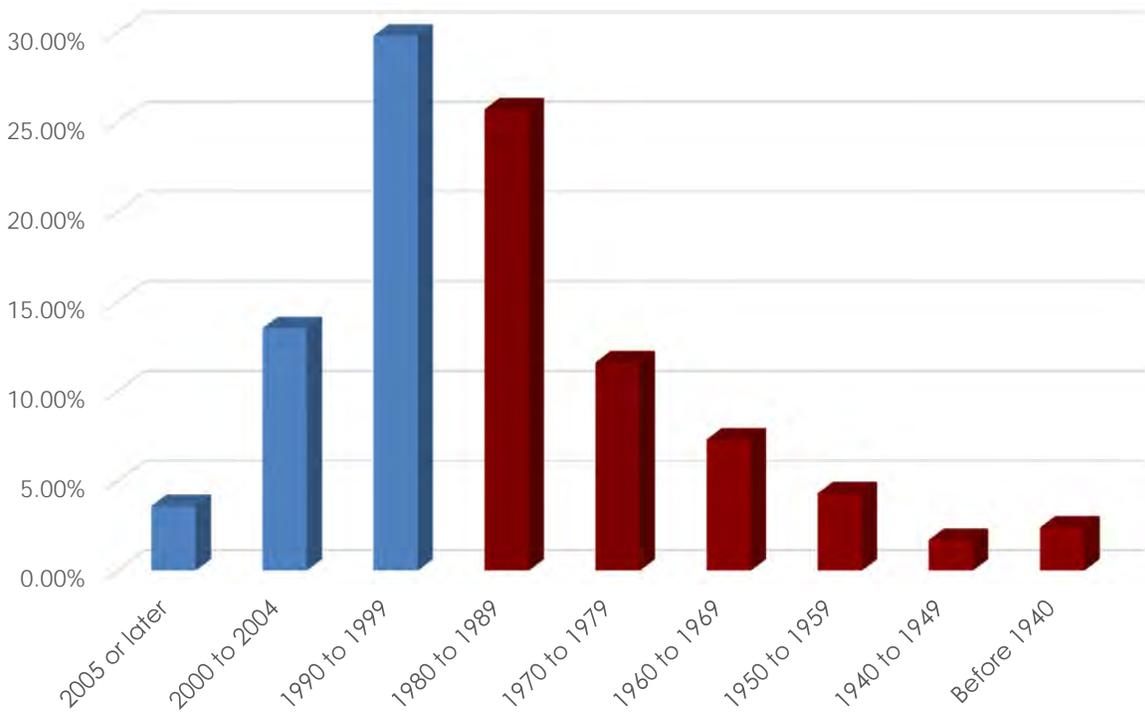
**Table II-11** indicates the number of homes built in Corona by decade. As of 2015, approximately 50 percent of the housing stock is at least 25 years old. A general rule of thumb in the housing industry is that homes approaching 30 years begin to require major investments to maintain quality. Improvements needed include siding, painting, and roofing among others. After 50 years, homes typically need new plumbing electrical systems, mechanical systems, lead-removal, and other major repairs.

**Table II-11**  
**Age of Housing Stock: Year Unit Built by Tenure**

Year Structure Built	Total Units		Owner			Renter		
	#	%	#	Share of Category	Share of Owner	#	Share of Category	Share of Rental
2005 or later	1,587	3.6%	1,120	3.7	70.6%	467	3.5%	29.4%
2000 to 2004	5,885	13.5%	4,749	15.7	80.7%	1,136	8.6%	19.3%
1990 to 1999	12,987	29.8%	9,480	31.3	73.0%	3,507	26.6%	27.0%
1980 to 1989	11,174	25.7%	7,140	23.6	63.9%	4,034	30.6%	36.1%
1970 to 1979	5,051	11.6%	3,143	10.4	62.2%	1,908	14.5%	37.8%
1960 to 1969	3,196	7.3%	2,482	8.2	77.7%	714	5.4%	22.3%
1950 to 1959	1,852	4.3%	1,219	4.0	65.8%	633	4.8%	34.2%
1940 to 1949	751	1.7%	438	1.4	58.3%	313	2.4%	41.7%
Before 1940	1,026	2.4%	545	1.8	53.1%	481	3.6%	46.9%
<b>Total:</b>	<b>43,509</b>	<b>100.0%</b>	<b>30,316</b>	<b>100.0%</b>	<b>69.7%</b>	<b>13,193</b>	<b>100.0%</b>	<b>30.3%</b>

Source: ACS, 2007-11.

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



To address housing conditions, particularly for low- and moderate-income homeowners, the City offers a residential rehabilitation program to encourage the rehabilitation of older homes.

*Housing Problems*

In 2012, U.S. Department of Housing and Urban Development (HUD) released Comprehensive Housing Affordability Strategy (CHAS) data based on special tabulations of five year ACS estimates. CHAS data help local agencies assess local trends in housing needs and problems. **Table II-12** displays the number of households earning less than 100 percent of median income who have at least one of the housing problems listed below. According to CHAS, the four (4) housing problems include lack of kitchen or complete plumbing facilities, overcrowding, severe overcrowding, cost burden and severe cost burden. The most prevalent housing problem for households in Corona is the high cost of housing.

**Table II-12**  
**Housing Problems: Households Earning Less than 100 percent AMI**

Housing Problem	Description	Owner	Renter
Substandard Housing	Lacking complete plumbing or kitchen facilities	40	275
Over-crowded	Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	175	630
	Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	560	1,070
Cost Burden	Housing cost burden greater than 50% of income (and none of the above problems)	3,700	2,704
	Housing cost burden greater than 30% of income (and none of the above problems)	1,524	2,390
Income	Zero/negative Income (and none of the above problems)	80	100
<b>Total:</b>		<b>6,079</b>	<b>7,169</b>

Source: CHAS, 2007-11.

**Table II-13** displays households with one or more severe housing problems, which includes lacking kitchen or complete plumbing, severe overcrowding, and/or severe cost burden.

**Table II-13**  
**Housing Problems: Households with One or More Severe Housing Problems**

Number of Households	Owner					Renter				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems listed above	810	930	1,655	1,085	4,480	1,610	1,455	1,224	395	4,684
Having none of four housing problems listed above	140	435	1,295	1,324	3,194	260	725	1,575	1,370	3,930
Household has negative income, but none of the other housing problems	80	0	0	0	80	100	0	0	0	100

Source: CHAS, 2007-11.

#### *Cost Burden*

Housing overpayment refers to paying more than 30 percent of income toward housings. Overpayment can be either moderate or severe. Moderate overpayment refers to paying 30 percent to 49 percent of income toward housing, and severe overpayment is anything higher. **Table II-14** shows the number of household paying more than 30 percent of income for housing in various area median incomes.

**Table II-14**  
**Cost Burden: Households Paying More than 30 percent of Income for Housing**

Number of Households	Owner				Renter			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	310	405	915	1,630	710	900	1,074	2,684
Large Related	115	230	665	1,010	264	430	260	954
Elderly	295	250	525	1,070	520	325	170	1,015
Other	160	120	145	425	225	280	430	935
<b>Total:</b>	<b>880</b>	<b>1,005</b>	<b>2,250</b>	<b>4,135</b>	<b>1,719</b>	<b>1,935</b>	<b>1,934</b>	<b>5,588</b>

Source: CHAS, 2007-11.

**Table II-15**  
**Cost Burden: Households Paying More than 50 percent of Income for Housing**

Number of Households	Owner				Renter			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	280	370	625	1,275	695	570	234	1,499
Large Related	95	175	465	735	260	235	95	590
Elderly	265	200	315	780	415	135	105	655
Other	160	120	135	415	225	195	175	595
<b>Total:</b>	<b>800</b>	<b>865</b>	<b>1,540</b>	<b>3,205</b>	<b>1,595</b>	<b>1,135</b>	<b>609</b>	<b>3,339</b>

Source: CHAS, 2007-11.

### *Overcrowding*

The general rule of thumb for the number of person for each room is one. Overcrowding is defined as having more than one person per room. **Table II-16** displays different income-level households with overcrowding problems.

The average household size was 3.3 in 2000 and it slightly increased 3.5 in 2011. This reflects a large share of City's households experiencing overcrowding, particularly single family households. The table below illustrates renters experience overcrowding problems more than owners.

**Table II-16**  
**Over Crowding Problems: More than One Person Per Room**

Number of Households	Owner					Renter				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	30	115	200	175	520	375	400	465	135	1,375
Multiple, unrelated family households	25	70	35	90	220	20	185	105	30	340
Other, non-family households	0	0	0	0	0	0	0	20	20	40
Total need by income	55	185	235	265	740	395	585	590	185	1,755

Source: CHAS, 2007-11.

### *For-Sale and Rental Housing Prices*

**Table II-17** below shows the median sales price for single-family home in Corona for the 2013 calendar year. In 2013, the average sales price for single-family homes in Corona was \$373,000 and \$256,000 for condominium units.

**Table II-17**  
**2013 Median Sales Prices**

Zip Code	Single Family Homes			Condominiums			SFR Only
	Sales of Single Family Homes	Price Median SFR (\$1,000)	Price % Change	Sales Count Condos	Price Median Condos (\$1,000)	Price % Change	Median Home Price/ Sq. Ft
92879	380	\$325	25.0%	170	\$176	11.6%	\$178
92880	861	\$410	20.6%	14	\$337	27.0%	\$151
92881	406	\$400	17.6%	47	\$285	54.1%	\$184
92882	655	\$370	21.3%	150	\$184	20.7%	\$190
92883	625	\$360	20.0%	60	\$300	24.4%	\$160

Source: DataQuick.

**Table II-18** lists the cost of rental housing based on the 2007-11 ACS data for the City of Corona. The rents are broken down by bedroom size.

**Table II-18**  
**Cost of Rental Housing: Rental Units by Price and Bedroom Size**

# of Bedrooms		Less than \$200	\$200 to \$299	\$300 to \$499	\$500 to \$749	\$750 to \$999	\$1,000 or more	No cash rent	Total:
Efficiency	# of units	0	15	14	0	145	108	0	282
	% of size	0.0%	5.3	5.0%	0.0%	51.4%	38.3%	0.0%	2.1%
	% of total	0.0%	11.6	5.0%	0.0%	6.3%	1.1%	0.0%	
1 Bedroom	# of units	0	95	191	256	1,108	1,412	23	3,085
	% of size	0.0%	3.1	6.2%	8.3%	35.9%	45.8%	0.7%	23.4%
	% of total	0.0%	73.6	68.5%	55.1%	48.4%	14.6%	6.7%	
2 Bedrooms	# of units	0	9	74	199	853	3,858	70	5,063
	% of size	0.0%	0.2	1.5%	3.9%	16.8%	76.2%	1.4%	38.4%
	% of total	0.0%	7.0	26.5%	42.8%	37.3%	39.8%	20.5%	
3 + Bedrooms	# of units	0	10	0	10	183	4,312	248	4,763
	% of size	0.0%	0.2	0.0%	0.2%	3.8%	90.5%	5.2%	36.1%
	% of total	0.0%	7.8	0.0%	2.2%	8.0%	44.5%	72.7%	
<b>Subtotal</b>		0	129	279	465	2,289	9,690	341%	13,193
<b>Share of Total</b>		0.0%	1.0%	2.1%	3.5%	17.4%	73.4%	2.6%	100.0%

Source: ACS, 2007-11.

According to the National Low-Income Housing Coalition's (NLIHC) *Out of Reach 2011 Report* for Riverside-San Bernardino-Ontario Area, the Fair Market Rent (FMR) for a two-bedroom apartment is \$1,144. In order to afford this level of rent and utilities, without paying more than 30 percent of income on housing, a household must earn \$3,813.33 monthly or \$45,760 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$22.00.

In Riverside County, a minimum wage worker earns an hourly wage of \$9.00. In order to afford the FMR for a two-bedroom apartment, a household must include 2.8 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 \$10.98 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a household must include 2.0 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

**Table II-19**  
**Riverside Cost of Rental Housing**

Fair Market Rents by Number of Bedrooms										
Year	Efficiency		1 Bedroom		2 Bedrooms		3 Bedrooms		4 Bedrooms	
	FMR	Incr.	FMR	Incr.	FMR	Incr.	FMR	Incr.	FMR	Incr.
2007	\$765		\$835		\$974		\$1,383		\$1,617	
2008	\$896	+17%	\$979	+17%	\$1,142	+17%	\$1,622	+17%	\$1,896	+17%
2009	\$867	-3%	\$954	-3%	\$1,125	-1%	\$1,583	-2%	\$1,846	-3%
2010	\$854	-1%	\$940	-1%	\$1,108	-2%	\$1,559	-2%	\$1,818	-2%
2011	\$882	+3%	\$970	+3%	\$1,144	+3%	\$1,610	+3%	\$1,877	+3%

Source: HUD Fair Market Rents for Riverside County.

The HUD Fair Market Rents by number of bedrooms over the last four years are shown in **Table II-19**. **Table II-20** shows the annual household income needed to afford rental units at the Fair Market Rent levels.

**Table II-20**  
**Income Needed to Afford FMR – Riverside County 2011**

Annual Income				
0 BR.	1 BR	2 BR	3 BR	4 BR
\$35,280	\$38,800	\$45,760	\$64,400	\$75,080

Source: National Low Income Housing Coalition, 2011.

### *Affordable Housing*

In recent years, the City has undertaken a number of projects to improve the supply of affordable housing through quality construction. In other projects, however, the City has addressed the need for affordable housing by facilitating the acquisition and rehabilitation of dilapidated projects into safe, decent, and affordable housing for Corona residents.

Table II-21 below summarizes the affordable housing inventory in Corona.

**Table II-21  
City of Corona Affordable Housing, 2014**

Project Name and Address	Type	Funding Source(s)	Total Units	Affordable Units	Date of Potential Conversion
Corona del Rey 1148 S. Street	Non At-Risk	Revenue Bond, Low/Mod Funds, City/County Home, Federal Tax Credits	160	160	Perpetuity
Casa de la Villa 313 S. Vicentia Avenue	Non At-Risk	Low/Mod Funds, Federal Tax Credits, Developer Funds	75	74	2060
Corona del Oro 630-650 W. 2 <sup>nd</sup> Street	Non At-Risk	Low/Mod Funds, HOME Funds, Federal Tax Credits	72	71	2055
River Run Senior Apartments 863 River Road	Non At-Risk	RDA Low/Mod Housing Funds, Federal Tax Credits	360	360	2055
Vintage Terrace Apartments 1910 Fullerton Street	Non At-Risk	HUD and Tax Credit	200	200	2038
Bridges America (Park Place) 935,945,950 W. Fifth Street	Non At-Risk	Low/Mod Funds, Developer Funds	48	48	2027
County Hills Apartments 720, 730 Via de Luna	Non At-Risk	Multi-family Mortgage Revenue Bond	412	410	2025
Corona Community Villas 2600 S. Main Street	At-Risk	Revenue Bond	75	74	2016 (Annual Renewal)
Corona Community Towers 910 S. Belle Street	At-Risk	HUD Section 202/Section 8	36	35	2016 (Annual Renewal)
William C. Arthur Terrace (formerly Sherman Avenue Senior Apartments)	At-Risk	HUD Section 202/Section 8	40	39	2016 (Annual Renewal)
Garrison House 779 Ford Street	At-Risk	HUD Section 202/Section 8	7	6	2017 (5-Year Renewal)
French Quarter 523 W. Seventh Street	At-Risk	Revenue Bond	14	3	Pending litigation
Jasmine Springs 909 Rimpau Avenue	At-Risk	Revenue Bond	59	12	Pending litigation
Villas de Corona 760 Rimpau Avenue	At-Risk	Revenue Bond	36	6	Pending litigation
Corona Park 956 Avenida Del Vista	At-Risk	HUD Section 8	160	94	2019
<b>Total:</b>			<b>1,754</b>	<b>1,592</b>	

Source: City of Corona Housing Element, 2013-21.

**F. Special Housing Needs Profile**

Certain residents have more difficulty finding decent and affordable housing or receiving fair housing treatment due to special circumstances. These may include employment and income, family type, disability, or other characteristics. In Corona, special need groups include seniors, people with disabilities, single parents, large families.

In recognition that people from different walks of life have different needs, state and federal laws encourage jurisdictions to provide a continuum of housing. **Table II-22** summarizes the level of special needs groups in Corona. The following discussion describes and analyzes the housing needs of each group. Data from the 2011 American Community Survey shows the size of special needs groups in Corona.

**Table II-22  
Special Needs Groups in Corona**

Special Needs	2011	
	Number	Percent of City
Senior Citizens <sup>1</sup>	11,104	7.3%
People with Physical Disability <sup>2</sup>	10,333	6.8%
Single-Parents with Children <sup>3</sup>	4,331	2.8%
Large Households <sup>4</sup>	5,280	3.5%

Source: 2007-11 ACS unless otherwise noted.

1. Percent of households with a member age 65 or older
2. Percent of residents older than 18-64 with a physical disability (2009-11)
3. Percent of households with single-parents with own children under age 18
4. Percent of households with five or more members residing in a home

*Senior Citizens*

According to the 2007-11 ACS, 7.3 percent of Corona’s residents were seniors, defined as age 65 or older. Senior households have special housing needs due to income, health care costs, and physical disabilities.

The City of Corona offers senior activities and resources to Corona’s elderly population. The Corona Senior Center offers special events and a full spectrum of services and activities. There are many exercise and dance classes, numerous recreational and social activities, workshops, arts and crafts, bingo games, health screenings, services and support groups.

*People with Disabilities*

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. In 2011, 7.5 percent (11,336) of Corona’s residents reported a physical disability. 6.8 percent (10,333) of the City’s population with disability are 18 years or older.

The Riverside Transit Agency (RTA) offers transportation discounted fares and bus services, which makes public facilities accessible to those with disabilities. The standard day pass is

\$4.00, with seniors and disabled persons eligible for a discounted rate of \$2.00.

### *Family Households*

Families with children have special housing needs due to lower per capita income, the need for affordable childcare, the need for affordable housing, or the need for larger units with 3 or more bedrooms. 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.

The 2007-11 ACS reported 4,331 people living in households comprised of single parents with children under age 18. Another type of household that is more at-risk of experiencing housing discrimination is large families, defined as households with five or more members. According to the 2007 ACS, the City had 5,280 large families. Large families often have difficulty finding adequately sized housing and may lease smaller units due to affordability concerns, which results in overcrowding.

### *Homeless Persons*

Housing affordability for those who are or were 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 2013 County of Riverside Homeless Count and Subpopulation Survey, there are 2,978 individuals and families that were homeless in the County, and 99 were in Corona.<sup>1</sup>

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<sup>1</sup> Riverside County 2013 Homeless Count and Subpopulation Survey, May 2013.

Table II-23 provides a list of current homeless facilities in the area.

**Table II-23**  
**Inventory of Existing Homeless Facilities in Riverside County**

Location	No. of Beds
Alternative Domestic Violence 515 Corona Mall, Corona, CA 92879	60
Coachella Valley Rescue Mission 47-518 Van Buren Indio, CA 92202	58
Corona Homeless Task Force 420 Harrison Street, Corona, CA 92880	50
Corona Norco Rescue Mission 420 W. Harrison Street, Corona, CA 92880	80
Roy's Desert Resource Center 19531 McLane Street, North Palm Springs, CA 92262	90
Martha's Village & Kitchen Inc. 83-791 Date Avenue, Indio, California 92201	100
Operation Safe House 9685 Hayes Street, Riverside, CA 92503 72710 East Lynn Street, Thousand Palms, California	37
Path of Life Ministries Inc. Family 2530 Third Street, Riverside, CA 92507	50
Path of Life Ministries Inc. Year Round 2840 Hulen Place, Riverside, CA 92507	129
Shelter from the Storm 73555 Alessandro Drive, Palm Desert, CA 92660	70
Valley Restart Shelter Inc. 200 East Menlo Avenue, Hemet, CA 92543	35
<b>Total</b>	<b>759</b>

Source: County of Riverside Continuum of Care, 2015.

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.

### **A. 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 or 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 states 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 2012 calendar year, 17,888 households filed loan applications for housing in Corona. Of those applications, 1,842 were withdrawn before approval or denial and 539 were closed for incompleteness prior to a decision. Lending institutions rendered decisions on 15,507 loan applications. The data in **Table III-1** shows that the number of loan applications and loan approval rates is highest for home purchase loans, followed by refinancing and then home improvement. Conventional loans were more common for home purchases and for refinancing purposes. The average loan approval rate for all loan types was 85.3 percent.

**Table III-1**  
**Home Loan Application Activity in Corona**

Type	Number of Loans	Share of Loans	Number Approved	Approval Rate
<b>Home Purchase</b>	<b>4,574</b>	<b>29.5%</b>	<b>4,037</b>	<b>88.2%</b>
Conventional	2,248	14.5%	1,979	88.0%
FHA - Insured	2,004	12.9%	1,761	87.9%
VA - Guaranteed	322	2.1%	297	92.2%
FSA/RHS	0	0.0%	0	0.0%
<b>Home Improvement</b>	<b>289</b>	<b>1.9%</b>	<b>163</b>	<b>56.4%</b>
Conventional	219	1.4%	140	63.9%
FHA - Insured	69	0.4%	22	31.9%
VA - Guaranteed	1	0.1%	1	100.0%
FSA/RHS	0	0.0%	0	0.0%
<b>Refinancing</b>	<b>10,644</b>	<b>68.6%</b>	<b>9,034</b>	<b>84.9%</b>
Conventional	8,303	53.5%	6,951	83.7%
FHA - Insured	1,925	12.4%	1,722	89.5%
VA - Guaranteed	416	2.7%	361	86.6%
FSA/RHS	0	0.0%	0	0.0%
<b>Total:</b>	<b>15,507</b>	<b>100.0%</b>	<b>13,234</b>	<b>85.3%</b>

Source: 2015 Financial Institutions Examination Council – 2012 HMDA Database.

*Mortgage Interest Rates & Fees*

A key component to securing a home loan is the interest rate and fees associated with the loan. Studies show mixed indications as to whether or not minority families pay higher rates and fees. A 2009 Federal Reserve Bank of New York report on Subprime Mortgage Pricing examined 75,000 subprime loans and found no evidence of possible discrimination based on race or ethnicity.<sup>1</sup>

The Fannie Mae Foundation commissioned a study of mortgage rates from 1989 – 2001.<sup>2</sup> The study was published in the *Housing Policy and Debate*, Volume 17, Issue 1 of 2006. According to the study, the average annual percentage rate (APR) for African Americans was roughly 8.07 percent, while the average APR for whites was 7.96 percent. Although the authors concluded that economically the disparity in interest rates for African Americans resulted in a minimal economic impact (an increase of seven cents a month per \$1,000 of the loan amount), it was evident that African Americans, when all other factors were controlled, received higher interest rates on their home loans.

A significant conclusion of the study was the disparate loan terms for home refinancing for African Americans as compared to their white counterparts, when all other factors (e.g. credit history, loan amount and type, property, etc.) were controlled. African Americans average interest rate for refinancing a home loan was 8.82 percent, a much higher rate than whites whose average interest rate was 7.81 percent. The difference of 1.01 percent resulted in African Americans paying on average 71 cents more a month per \$1,000 of the borrowed amount, a substantial economic impact as compared to whites over the term of the loan. Clearly African Americans fare much worse in refinancing than whites. The average interest for Hispanics was slightly higher than that of whites as well for home loans, but there was little difference in the average interest rate amongst Hispanics and whites for refinancing. The disparity of higher interest rates for home loans of African Americans and Hispanics, as well as the disparity of higher interest rates for African Americans in refinancing home loans is an impediment.

The authors looked at conventional home loans as a subset of all mortgage types analyzed in the study. Once again, the average APR for African Americans for conventional loans was higher for home purchases and also for refinancing of home loans as compared to whites. The average APR amongst Hispanics for conventional loans was also higher than whites, although the gap was not as high as it was for African Americans. Such discriminatory practices in loans for African American and Hispanic homebuyers are impediments to homeownership. (The study did conclude that there was no disparity on the interest rates charged to Hispanics as compared to whites for refinancing home loans).

Not only is there empirical evidence of discrimination in the interest rates charged for home loans and refinancing for certain minority groups, but also discrimination in the mortgage rate fees charged for home loans of African Americans and Hispanic borrowers. According to HUD's Office of Policy Development, African Americans and Hispanics pay on average \$415 and \$365 more, respectively, for closing costs on FHA mortgages as compared to

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<sup>1</sup> Subprime Mortgage Pricing: The Impact of Race, Ethnicity, and Gender on the Cost of Borrowing, Federal Reserve Bank of New York, by Andrew Haughwout, Christopher Mayer, and Joseph Tracy, April 2009.

<sup>2</sup> Rates and Race: An Analysis of Racial Disparities in Mortgage Rates, by T. Boehm, P. Thistle, A. Schlottman, 2005

whites, when all other factors such as loan amounts and property values are controlled.<sup>3</sup>

In addition, disparate mortgage fees are charged based on the racial composition of the borrower’s neighborhood; borrowers in African American neighborhoods pay on average \$120 more for title services and borrowers in primarily Hispanic census tracts pay \$110 more compared to borrowers residing in non-minority neighborhoods.<sup>4</sup> The disparate charge of mortgage interest rates and fees for African Americans and Hispanics borrowers is an impediment to housing choice.

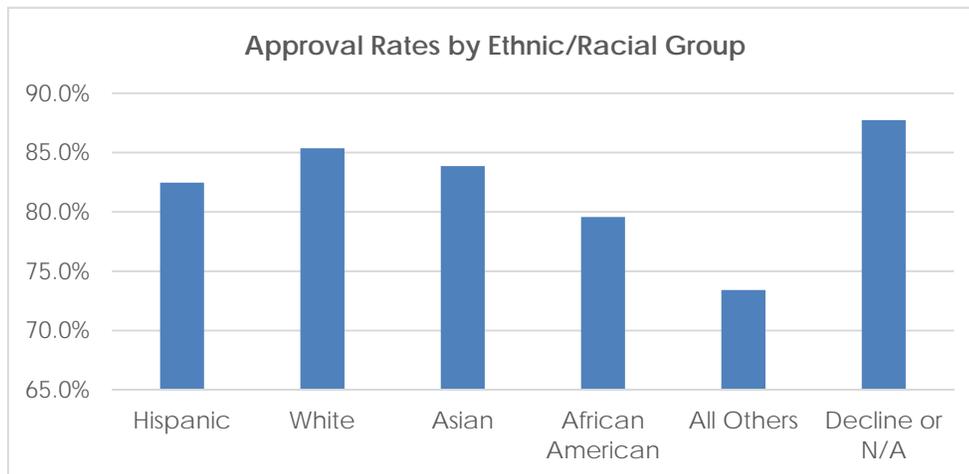
*Lending Outcomes*

This section summarizes lending activity in Corona from 2012. 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 each type of loan analyzed. The average approval rates for each loan type were 88.2 percent, 56.4 percent, and 84.69 percent respectively. Low- and moderate-income applicants had overall approval rates of 80.9 percent. The best approval rates were for upper income home purchase loan applicants at 89.3 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. Approval rates were highest for Whites, followed by those declining to state. African Americans and all other races combined had the lowest approval rate at 78.4 percent. **Graph III-1** shows loan approval rates by race or ethnicity based on data in **Table III-2** showing loan approval rates for home purchases, home improvement, and refinances by applicant characteristics.

**Graph III-1**



<sup>3</sup>*Mortgage Interest Rates and Fees, A Study of Closing Costs for FHA Mortgages*, HUD Office of Policy Development and Research, by Susan E. Woodward for the Urban Institute, May 2008.

<sup>4</sup> *Ibid.* Study can be found at [www.huduser.org/Publications/pdf/FHA\\_closing\\_cost.pdf](http://www.huduser.org/Publications/pdf/FHA_closing_cost.pdf).

**Table III-2  
Home Loan Approval Rates by Applicant Characteristics**

Type	Low/Mod Income <80% MFI		Middle Income 80-120% MFI		Upper Income 120+ MFI	
Race/ Ethnicity	Loan Applications	Approval Rate	Loan Applications	Approval Rate	Loan Applications	Approval Rate
<b>Home Purchase</b>	<b>832</b>	<b>84.0%</b>	<b>956</b>	<b>89.0%</b>	<b>2,786</b>	<b>89.3%</b>
Hispanic	261	84.3%	236	87.7%	427	87.8%
White	257	82.9%	367	91.3%	1,165	89.4%
Asian	94	78.7%	114	79.8%	496	89.3%
African American	27	77.8%	22	90.9%	85	85.9%
All Others	6	66.7%	9	66.7%	15	80.0%
Decline or N/A	187	89.3%	208	92.3%	598	90.8%
<b>Home Improvement</b>	<b>65</b>	<b>40.0%</b>	<b>41</b>	<b>58.5%</b>	<b>183</b>	<b>61.7%</b>
Hispanic	16	50.0%	4	75.0%	7	42.9%
White	16	56.3%	9	66.7%	83	67.5%
Asian	2	0.0%	2	100.0%	20	70.0%
African American	2	0.0%	1	0.0%	6	50.0%
All Others	1	100.0%	1	0.0%	2	50.0%
Decline or N/A	28	28.6%	24	54.2%	65	55.4%
<b>Home Refinance</b>	<b>1,961</b>	<b>80.9%</b>	<b>2,009</b>	<b>85.5%</b>	<b>6,674</b>	<b>85.8%</b>
Hispanic	271	73.4%	239	81.2%	586	81.7%
White	541	77.6%	568	82.7%	2,971	85.9%
Asian	162	72.2%	225	85.3%	1,016	84.1%
African American	23	65.2%	28	82.1%	134	79.1%
All Others	5	100.0%	7	57.1%	33	75.8%
Decline or N/A	959	86.7%	942	88.6%	1,934	88.6%

Source: 2015 Financial Institutions Examination Council – HMDA Database 2012.

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 could be the subject of additional inquiry and examination.

**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**

Tract Characteristics	Home Purchase Loans			Home Refinance Loans		
	Number of Applications	Number Approved	Percent Approved	Number of Applications	Number Approved	Percent Approved
<b>Minority Percentage</b>						
20% to 50%	1,420	1,263	88.9%	3,868	3,302	85.4%
50% to 80%	3,045	2,682	88.1%	6,615	5,599	84.6%
80% +	109	92	84.4%	161	133	82.6%
<b>Tract Income</b>						
Low	0	0	0.0%	0	0	0.0%
Moderate	154	128	83.1%	243	203	83.5%
Middle	664	586	88.3%	1,459	1,209	82.9%
Upper	3,756	3,323	88.5%	8,942	7,622	85.2%

Source: HMDA data, 2012.

**Lender Performance and CRA requirements.** In 2012, the top mortgage lenders received 46.4 percent of conventional home purchase loan applications in Corona (**Table III-4**). Among the top lenders, Standard Pacific Mortgage (97.7 percent), iMortgage (95.2 percent), and Primelending (93.9 percent) had the highest approval rates. US Bank (84.8 percent), JP Morgan Chase Bank, NA (73.8 percent), and Bank of America, NA (67.9 percent) had the lowest approval rates.

HMDA collects data on loan denial reasons from all lenders. The most frequently-cited denial reasons in Corona during 2012 included debt-to-income ratio, collateral, and incomplete credit application.

**Table III-4  
Disposition of Conventional Home Purchase Loan Applications by Lending Institution**

Lender	Loan Application Outcome			
	Total Loan Applications	Share of Applicants	Percent Approved	Percent Denied
Wells Fargo Bank, NA	478	21.3%	92.7%	7.3%
Flagstar Bank	102	4.5%	92.2%	7.8%
Provident Savings Bank, FSB	81	3.6%	91.4%	8.6%
21 <sup>st</sup> Mortgage	65	2.9%	89.2%	10.8%
JP Morgan Chase Bank, NA	65	2.9%	73.8%	26.2%
iMortgage	62	2.8%	95.2%	4.8%
Bank of America, NA	53	2.4%	67.9%	32.1%
Primelending	49	2.2%	93.9%	6.1%
US Bank	46	2.0%	84.8%	15.2%
Standard Pacific Mortgage	43	1.9%	97.7%	2.3%
Balance of Market (Other Lenders)	1,204	53.6%	86.4%	13.6%
<b>Total Market (All Lenders):</b>	<b>2,248</b>	<b>100.0%</b>	<b>88.0%</b>	<b>12.0%</b>

Source: Financial Institutions Examination Council – HMDA Database Version 3.4 ©2012.

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. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance. Databases maintained by the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), and Office of the Comptroller of the Currency (OCC) were researched regarding the performance of the top financial institutions issuing home loans.

**Table III-5  
Lending Institution Regulators by Type of Institution**

Regulating Enforcement Agency	Type of Institution
Board of Governors of the Federal Reserve System (FRB)	State member banks; Bank holding companies; Nonbank subsidiaries of bank holding companies; Savings and loan holding companies; Edge and agreement corporations; Branches and agencies of foreign banking organizations operating in the United States and their parent banks; Officers, directors, employees, and certain other categories of individuals associated with the above banks, companies, and organizations (referred to as "institution-affiliated parties").
Federal Deposit Insurance Corporation (FDIC)	Insured State chartered banks that are not members of the Federal Reserve System (State nonmember banks); Insured branches of foreign banks; Officers, directors, employees, controlling shareholders, agents, and certain other categories of individuals (institution-affiliated parties) associated with such institutions.
National Credit Union Administration (NCUA)	Credit unions.
Office of the Comptroller of the Currency (OCC)	National banks and their subsidiaries; Federally chartered savings associations and their subsidiaries; Federal Branches and agencies of foreign banks; Institution-affiliated parties (IAPs), including (a) Officers, directors, and employees, and (b) A bank's controlling stockholders, agents, and certain other individuals.

Source: Federal Financial Institutions Examination Council (FFIEC), January 2015.  
<http://www.ffiec.gov/enforcement.htm>.

Databases maintained by the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), and Office of the Comptroller of the Currency (OCC) were researched regarding the performance of the top financial institutions issuing home loans. No enforcement actions were found for the top 10 home loan originators in Corona during 2012. **Table III-6** provides a summary of the available CRA reviews and resulting ratings for each of the top conventional home loan purchase originators in Corona during 2012.

**Table III-6  
CRA Review Results for Top Lending Institutions for  
Conventional Home Loan Purchases in Corona, 2012**

Lending Institution	CRA Review Year	Review Rating
Wells Fargo Bank, NA	2008	Outstanding
Flagstar Bank	1997	Satisfactory
Provident Savings Bank, FSB	2013	Satisfactory
21 <sup>st</sup> Mortgage	-	Unavailable
JP Morgan Chase Bank, NA	2013	Satisfactory
iMortgage	-	Unavailable
Bank of America, NA	2010	Outstanding
Primelending	-	Unavailable
US Bank	2007	Outstanding
Standard Pacific Mortgage	-	Unavailable

Source: Bank websites and News Releases.

*Predatory Lending*

Predatory lending involves abusive loan practices usually targeting minority homeowners or those with less-than-perfect credit histories. The predatory 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 requires equal treatment in terms and conditions of housing opportunity and credit regardless of race, religion, color, national origin, 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, sex, 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 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.

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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 has 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.

The high incidence of foreclosure and the housing crisis in general represented a system-wide collapse of the housing market that resulted in numerous national, state and local efforts to reform virtually every aspect of housing acquisition and finance. Due to the widespread and complex nature of the foreclosure crisis was not possible to point to particular lenders or lending practices within the City that may have contributed to incidences of foreclosure or revealed patterns of discrimination against protected classes.

### *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 City of Corona and has over 3,300 members. 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 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 of 92,000 realtors 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](http://www.dre.ca.gov/licensees_sub.htm). This web site includes any complaints or disciplinary action against the agent.

**The Inland Gateway Association of Realtors (TIGAR).** The Inland Gateway Association of Realtors ("TIGAR") is a local affiliate of NAR and CAR based in Corona. It serves Realtors in Corona, Norco, and surrounding Riverside County communities. TIGAR offers education and professional designation programs, including NAR diversity certification.

**Inland Valleys Association of Realtors.** The Inland Valleys Association of Realtors ("IVAR") serves Realtors in Corona and other Inland Empire communities. The IVAR covers Riverside and San Bernardino counties and includes 19 cities. IVAR provides continuing

education to members, including course on the topics of ethics, trust funds, fair housing, and real estate agencies. Realtors with fair housing questions, or who are in need of additional information, are usually referred to CAR. Potential violations of fair housing law are referred to the Inland Fair Housing and Mediation Board and Fair Housing Council of Riverside County. IVAR also provides resource information and a multiple listing service.

**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.

## **B. 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).

#### *Viewing the Unit*

Viewing the unit is the most obvious 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 in the decision to rent the unit.

#### *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.

#### *The Lease*

Most apartments are rented under either a lease agreement or a month-to-month rental agreement. A lease is favorable from a tenant's point of view for two reasons: the tenant is assured the right to live there for a specific period of time and the tenant has an established rent during that period. Most other provisions of a lease protect the landlord. The lease agreement usually includes the rental rate, required deposit, length of occupancy, apartment rules, and termination requirements. 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 contracts 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 provides programs and services focused on eliminating housing discrimination, general housing assistance, and education and outreach activities to residents in the Riverside County. The comprehensive Fair Housing services include:

- **Expanding Affordable Housing Opportunities:** Educate the public on the home buying process; advocate for affordable and accessible housing from a public policy perspective; work in partnership with developers; and inform first time home buyers about down payment assistance program information.
- **Housing Rehabilitation:** Include information about the City’s Residential Rehabilitation Program with the FHCRC’s outreach materials.
- **Public Policies and Programs Affecting Housing Development:** Advocate for fair zoning laws; combat “not in my back yard” syndrome; monitor the use of eminent domain and provide appropriate education on the topic. Work with the city on local housing ordinances.
- **Outreach to Lenders:** Invite lenders to participate in homebuyer seminars; schedule roundtable communications workshops with lenders; encourage lenders to become a HUD Certified Lender to help low/moderate income clients to become homeowners.
- **Fair Housing Services:** Provide education about tenant-landlord rights and discrimination; train and provide technical assistance to clients; enforce fair housing regulations.
- **Access to Home Purchase Financing:** Enhance access to home purchase financing through homebuyer education; referrals; and financial literacy education and referrals to credit counseling agencies.
- **Foreclosure Prevention Outreach Services:** Conduct one foreclosure prevention workshop per quarter with follow up appointments for additional counseling and case management; provide information on predatory lending, how to budget, credit counseling and financial literacy.

During the five-year period covering the last A.I. cycle (2010-14), FHCRC assisted rental housing residents in the City of Corona with the resolution of a wide variety of landlord/tenant issues. **Table III-7** includes a five-year tabulation of landlord-tenant related inquiries received by FHCRC. The top five (5) complaints involved repairs (21.7 percent), eviction (21.1 percent), lease/rental terms (19.9 percent), other issues (11.7 percent) and security deposit issues (7.6 percent). It is important to note that any resident of the 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.

**Table III-7  
General Housing Inquiries (Rental)**

Inquiry Category	2008-2009	2009-2010	2010-2011	2011-2012	Total
Notices	8	17	78	53	156
Habitability	0	1	1	0	2
Mold	0	3	19	12	34
Eviction	104	221	135	63	523
Rent increase	0	2	28	31	61
General issue	0	0	0	0	0
Security Deposit	17	29	76	66	188
Unlawful Detainer	0	0	0	0	0
Substandard Condition	0	0	0	0	0
Foreclosure	0	0	0	9	9
Entering/Harassment	4	4	28	30	66
Lease/Rental Terms	107	147	104	135	493
Utilities	0	0	0	0	0
Other	46	69	119	55	289
Repairs	125	136	164	111	536
Mobile Home	4	9	32	10	55
Retaliation	0	0	0	0	0
Late Fees	0	0	6	3	9
Illegal Entry	0	0	0	0	0
Refusal to Rent	0	0	0	0	0
Rental Assistance	0	0	8	10	18
Rent Control	0	0	0	0	0
Illegal Lockout	0	0	0	0	0
Accommodations/Modifications	0	0	0	0	0
Homeless Assistance Referral	0	0	7	7	14
Pets	0	0	0	0	0
Relocation	0	0	0	0	0
Nuisance	0	0	0	0	0
Section 8 Information	0	10	0	11	21
Right and Responsibilities	0	0	0	0	0
<b>Total:</b>	<b>415</b>	<b>648</b>	<b>805</b>	<b>606</b>	<b>2,474</b>

Source: FHCRC, 2015.

*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.

**A. 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 is 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**

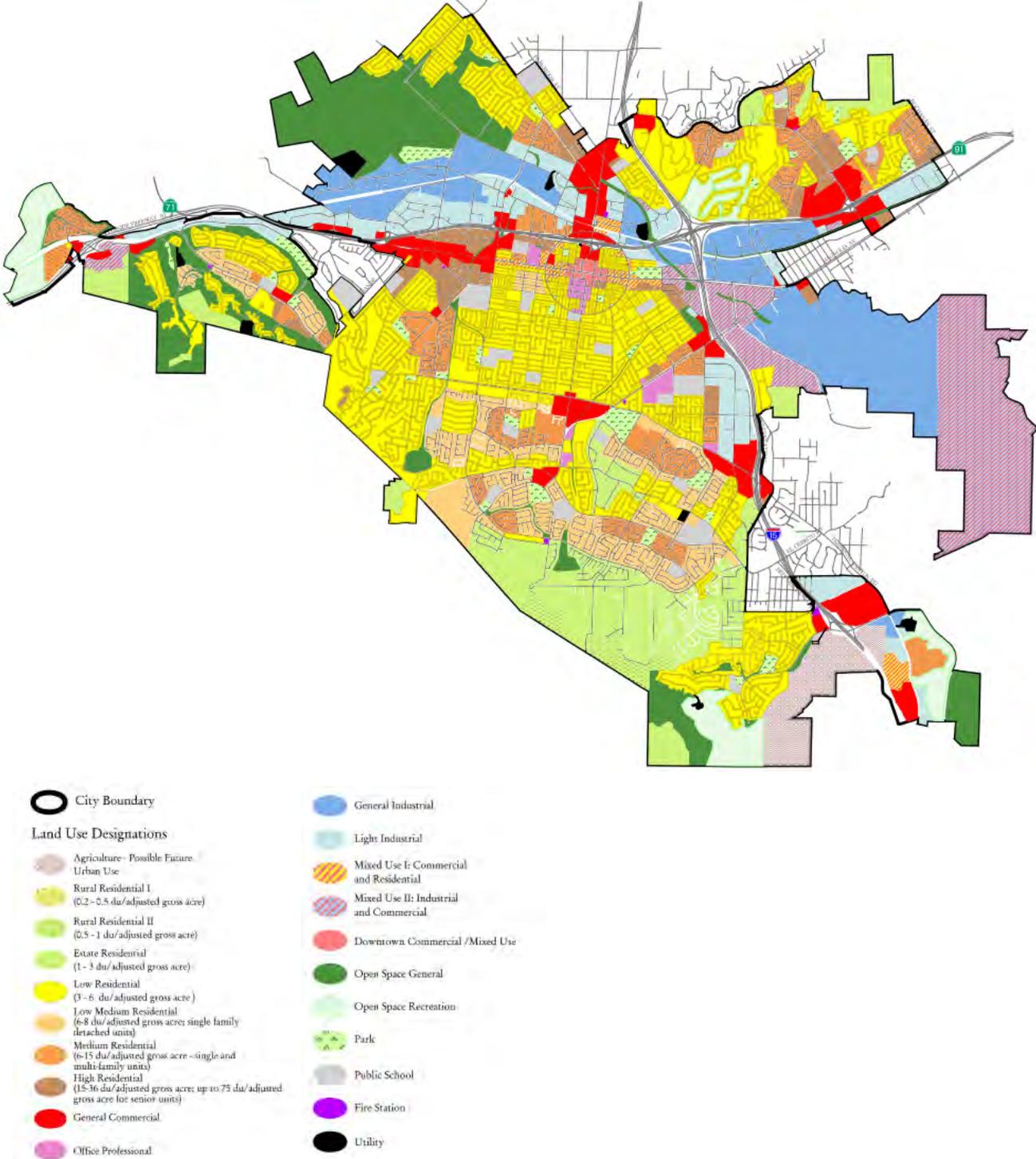
Land Use Designation	Description	Area (in acres)	% of Total
Residential	Single-family and mobile home parks	9,380	38.0
Multi-Family	Multi-family and condominium	556	2.2
Commercial	Highway/Regional commercial; Commercial Professional, Neighborhood Commercial	1,104	4.5
Mixed Use	Commercial/Industrial & 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
<b>Total:</b>		<b>24,666*</b>	<b>100.0%</b>

Source: City of Corona General Plan, 2004.

\*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 higher than under the existing land uses. As of 2015, the City is 24,915 acres according to City GIS.

Map IV-1 illustrates the City's land use designations.

Map IV-1  
Citywide Land Use Map



Source: City of Corona General Plan, 2004

*Zoning Ordinance*

Chapter 17 of the Corona's 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-G 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). 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 facilitate quality development within the city permitting flexibility and 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, to attain a desirable balance of residential and employment opportunities, a high level of urban amenities, and to preserve natural and scenic open qualities of open space.

#### *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 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**

Housing Opportunities	Zone District								
	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	C	P	X	X	X	X
Second Units	P	P	P	X	P	X	X	X	X
Manufactured Housing	P	P	P	X	P	X	X	X	X
Care Facility for 6 or Less	P	P	X	P	P	X	X	X	X
Care Facility for 7 or More	C	C	X	C	C	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=Conditionally Permitted; X=Not Permitted; BZA=Board of Zoning 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 means each residential dwelling unit in a development that has a density of eight units to the gross acre or less.

*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 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 include in addition 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.<sup>1</sup> 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.<sup>2</sup> In compliance with State law, the City permits mobile homes parks and mobile home subdivisions within the Mobile Home Park zone. The City has 14 mobile home parks including:

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<sup>1</sup>California Government Code, § 65852.3

<sup>2</sup>California Government Code § 65852.7

- 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. 8<sup>th</sup> 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. 6<sup>th</sup> St, Corona, CA 92882)
- Amberlite Mobile Home Estates (853 N. Main St, Corona, CA 92880)
- Buena Vista Mobile Manor (206 S. Buena Vista Ave, Corona, CA 92882)
- La Corona Mobile Home Park (1410 E. 6<sup>th</sup> 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.<sup>3</sup> According to HCD, a local government must "...accept the application and approve or disapprove the application ministerial without any discretionary review..." In order 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*

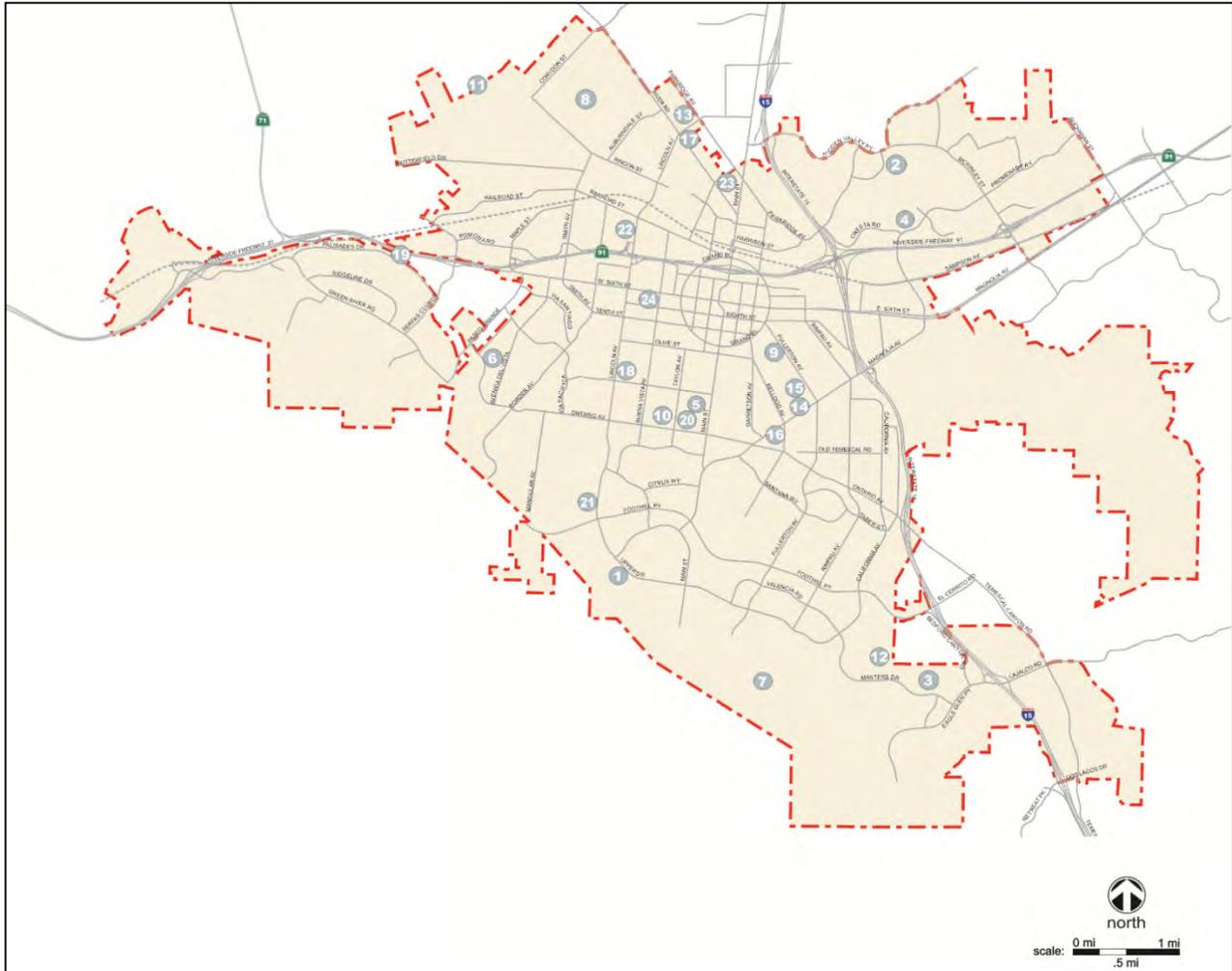
The Lanterman Developmental Disabilities Services Act declares that mentally, physically, and developmentally disabled persons, children and adults who require supervised care are entitled to live in normal residential settings. State law requires that licensed residential care facilities serving six 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.<sup>4</sup> 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-2** illustrates the distribution of such facilities throughout the City of Corona. 21 licensed residential care facilities provide accommodations to over 120 residents.

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<sup>3</sup>California Government Code § 65852.2

<sup>4</sup>Welfare and Institutions Code, §5000 et. seq. Health and Safety Code, §1500 et. seq.

Map IV-2  
Licensed Residential Care Facilities



No.	Facility	Address	Capacity
<b>Adult Residential Facility</b>			
1	Ana Maria's Home	3681 Logan Circle	6
2	Austin Small Arizona Family Home	867 Montague Drive	6
3	Crystal Downs ARF, Inc.	1897 Crystal Downs Drive	4
4	Evans Adult Residential I	524 Clinton Circle	6
5	Greater Strides	309 W. Hacienda Drive	4
6	Manitoba Residential Care	1703 Manitoba Circle	5
7	Maria M. Blaya	1113 Sandra Circle	6
8	Marjan Residential Care Home II	1008 Meadowview Court	4
9	McCoy ARF Care*	810 Ford Street	4
10	New Era 1 Care Home	2152 S. Vicentia Avenue	6
11	Noah's Adult Home	806 Homestead Road	5
12	Noah's Rainbow Adult Home	3510 State Street	6
13	Peaceful Living #2	1112 Peaceful Drive	4

14	Peppermint Ridge	825 Magnolia Avenue	12
15	Peppermint Ridge – Aspen	860 Aspen Street	6
16	Peppermint Ridge – Cypress Point	632 Magnolia Avenue	6
17	Queenspark Residential Care*	1033 Queenspark Road	4
18	Rancho Road Community Care Home	1035 W. Rancho Road	6
19	Robinson Ranch Adult Home	2520 Monterey Peninsula Drive	6
20	Saginario Residential Care	381 W. Ontario Avenue	6
21	Tender Loving Care	1125 SilverCreek Road	4
<b>Adult Day Care</b>			
22	Basic Occupational Training Center	1121 Bradford Circle	65
23	First Step Corona	237 River Road	75
24	New Living Options, Inc.*	920 W. 6 <sup>th</sup> Street	45

Source: State of California, 2015.

[http://www.cclcd.ca.gov/docs/cclcd\\_search/cclcd\\_search.aspx](http://www.cclcd.ca.gov/docs/cclcd_search/cclcd_search.aspx)

\*Indicates license pending from Community Care Licensing Facility (CCLD)

### *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.<sup>5</sup> 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.

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;

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<sup>5</sup>Hoffmaster v. City of San Diego, 55 Cal.App.4th 1098

- 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, the hospital, 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-3** summarizes the results of this study.

**Table IV-3  
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.
Mischaracterize 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 on-site 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.
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.

Impediment Description	Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Jurisdiction Practice	Comment
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.
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.

Impediment Description	Type of Impediment "Practice or Regulatory"	Compliance Yes or No	Jurisdiction Practice	Comment
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.
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, 2015.

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.

**B. Development Policy**

*Development Standards*

The Zoning Ordinance provides policy guidance for where housing can be located and also establishes minimum residential development standards to ensure the construction of quality housing, to preserve and protect neighborhoods, and to further broader City goals. **Table IV-4** provides information on single-family and multi-family residential development standards in the City of Corona.

**Table IV-4  
Residential Development Standards**

Zone	Max. Density	Yard Setbacks			Parking Standards	Max. Height	Max. Lot Coverage
		Front	Side	Rear	Parking per DU		
<b>Rural/Estate Residential</b>							
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-1-20.0	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)
<b>Low Density Residential</b>							
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	30'	75%
<b>Medium Density Residential</b>							
R-3	12.0	30'	10'-15'	10'	*	35'	40%
R-2	12.1	25'	10'-15'	10'	*	35'	50%
<b>High Density Residential</b>							
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-5** includes planning discretionary fees and **Table IV-6** provides an approximation of the planning and processing fees associated with the development of a 2,000 square foot three bedroom, two bathroom, and a two car garage dwelling on a 7,000 square foot lot.

**Table IV-5  
Discretionary Fees**

Description	Fee
Conditional Use Permit (Minor)	\$1,780
Conditional Use Permit (Major)	\$6,085
Conditional Use Permit (Major Modification)	\$4,040
Variance (Minor)	\$855
Variance (Major)	\$6,155
Tentative Tract Map	\$7,670
Residential Parcel Map Review	\$4,490
Lot Line Adjustment	\$2,945
General Plan Amendment	\$6,125
Zone Text Amendment	\$5,375
Negative Declaration (with or without Mitigation)	\$2,965
Environmental Impact Report (EIR)	Full Cost
Appeal Planning Commission	\$785
Certificate of Compliance	\$1,520

Additional scanning and lot fees may apply.  
Source: City of Corona, Effective July 1, 2014.

**Table IV-6  
Planning and Processing Fees**

Description	Fee
Building Permit	\$4,582
Improvement Plan Check	\$2,182
Grading Permit	\$8,503
Water/Sewer Permit	\$25,000
Grading Permit and Inspection	\$8,503

Source: City of Corona Housing Element, 2013-21.

**Table IV-7** 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-7  
Comparison of City Permit Fees**

Permit	Norco	Moreno Valley	Riverside	Corona
Conditional Use Permit	\$2,910 - \$6,158	\$6,365 - \$10,926	\$8,173	\$1,780 - \$6,085
Conditional Use Permit Modification	\$2,563 - \$2,621	\$5,875	N/A	\$ 4,040
Variance	\$770	\$663 - \$3,663	\$763	\$855- \$6,155
Tentative Tract Map	\$12,100	\$11,307	\$6,971	\$7,670
Tentative Parcel Map	\$6,036	\$9,049	\$4,607	\$4,490
Lot Line Adjustment	\$1,096	\$1,168	\$2,431	\$2,945
Zone Change	\$5,050	\$3,500	\$4,297	\$4,195
General Plan Amendment	\$5,050	\$3,500	\$7,669	\$6,125
Zoning Regulation Amendment	\$3,291	\$5,000	\$4,297	\$5,375

Source: City websites, 2015.

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 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 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).

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 Title 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.<sup>6</sup>

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 504 and 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.<sup>7</sup>

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.<sup>8</sup> 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.

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<sup>6</sup>Section 804(f)(3)(C) of the Fair Housing Act.

<sup>7</sup> HUD Directive, Number 00-09.

<sup>8</sup>State Office of Attorney General, May 15, 2001.

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 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.<sup>9</sup> 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, for larger projects with single-family residential subdivisions consisting of five or more parcels and all multi-family construction projects undergo site plan and architectural review, a Precise Plan review is required. 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 CUP.

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

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<sup>9</sup>Government Code Section 65920 et seq.

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.

#### *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 (1) of six (6) conditions exists. Three (3) conditions are of most 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.<sup>10</sup>

#### Community Representation

The City values citizen input on how well city government 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.

#### *Public Housing Authority (PHA) 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 discrimination or unfair practices in the Housing Authority's selection of tenants to occupy public housing projects.

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<sup>10</sup>Government Code Section 65589.5

*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.

**C. 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 (5) 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 (formerly Section 8) 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*

A total of 269 units in Corona are at risk of losing their affordability controls prior to December 2023. It is the objective of the City to either retain or replace as low income housing all 230 at-risk 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 (Enhancing Community Pride)*

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-8** shows all of the issue categories, policies and programs to be implemented in the City to achieve its housing goals.

**Table IV-8  
Housing Programs Included in the 2013-21 Housing Element**

Goal Category / Housing Element Policy	Implementing Program
<p>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.</p>	
<p>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.</p>	<ul style="list-style-type: none"> <li>• Neighborhood Improvements (Enhancing Community Pride)</li> <li>• Affordable Housing Development</li> <li>• Density Bonus Program</li> <li>• Zoning Ordinance Monitoring</li> <li>• Development Fees</li> <li>• Expedited Project Review and Hearing Process</li> <li>• Fair Housing Program</li> <li>• Homeless and Special Needs Support Services</li> </ul>
<p>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.</p>	<ul style="list-style-type: none"> <li>• Multi-Family Acquisition and Rehabilitation</li> <li>• Infill Housing Development</li> </ul>
<p>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.</p>	<ul style="list-style-type: none"> <li>• Multi-Family Acquisition and Rehabilitation</li> </ul>
<p>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.</p>	<ul style="list-style-type: none"> <li>• Site Availability</li> <li>• Density Bonus Program</li> <li>• Development Fees</li> </ul>

Goal Category / Housing Element Policy	Implementing Program
<p>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.</p>	<ul style="list-style-type: none"> <li>• Multi-Family Acquisition and Rehabilitation</li> <li>• Infill Housing Development</li> <li>• Density Bonus Program</li> <li>• Development Fees</li> <li>• Expedited Project Review and Hearing Process</li> </ul>
<p>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.</p>	
<p>Policy 2.1: Encourage the development of rental units with three or more bedrooms to provide affordable housing for large families.</p>	<ul style="list-style-type: none"> <li>• Zoning Ordinance Monitoring</li> <li>• Development Fees</li> <li>• Fair Housing</li> <li>• Homeless and Special Needs Support Services</li> </ul>
<p>Policy 2.2: Work with nonprofit agencies and private sector developers to encourage development of senior housing.</p>	<ul style="list-style-type: none"> <li>• Multi-Family Acquisition and Rehabilitation</li> <li>• Infill Housing Development</li> <li>• Zoning Ordinance Monitoring</li> <li>• Development Fees</li> <li>• Expedited Project Review and Hearing Process</li> <li>• Fair Housing</li> </ul>
<p>Policy 2.3: Encourage the production of assisted living facilities (single-story houses and apartments) for the disabled and the elderly.</p>	<ul style="list-style-type: none"> <li>• Multi-Family Acquisition and Rehabilitation</li> <li>• Infill Housing Development</li> <li>• Zoning Ordinance Monitoring</li> <li>• Development Fees</li> <li>• Fair Housing</li> <li>• Homeless and Special Needs Support Services</li> </ul>
<p>Policy 2.4: Provide emergency shelter with transitional support for City residents, including disadvantaged groups.</p>	<ul style="list-style-type: none"> <li>• Homeless and Special Needs Support Services</li> </ul>
<p>Policy 2.5: Encourage the upgrade and conversion of older motels to single-room occupancy housing.</p>	<ul style="list-style-type: none"> <li>• Fair Housing</li> <li>• Homeless and Special Needs Support Services</li> </ul>
<p>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.</p>	
<p>Policy 3.1: Recognize the City's inventory of existing historic structures and seek programs to enhance and preserve those neighborhoods.</p>	<ul style="list-style-type: none"> <li>• Residential Rehabilitation</li> <li>• Sustainable Building</li> <li>• Affordable Housing Development</li> </ul>

Goal Category / Housing Element Policy	Implementing Program
Policy 3.2: Encourage the revitalization of the existing dwelling units in the circle area through rehabilitation programs.	<ul style="list-style-type: none"> <li>• Residential Rehabilitation</li> <li>• Affordable Housing Development</li> </ul>
Policy 3.3: Provide public services and improvements that enhance and create neighborhood stability.	<ul style="list-style-type: none"> <li>• Sustainable Building</li> </ul>
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.	<ul style="list-style-type: none"> <li>• Residential Rehabilitation</li> <li>• Sustainable Building</li> <li>• Affordable Housing Development</li> <li>• Density Bonus</li> </ul>
Policy 3.5: Maintain design review for new residential developments to ensure the construction of livable and aesthetically pleasing neighborhoods.	<ul style="list-style-type: none"> <li>• Expedited Project Review and Hearing Process</li> </ul>
<p>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.</p>	
Policy 4.1: Coordinate housing actions with social service agencies and support efforts of organizations dedicated to working toward elimination of discrimination in housing.	<ul style="list-style-type: none"> <li>• Homeless and Special Needs Support Services</li> </ul>
Policy 4.2: Promote and provide for nondiscrimination in all City programs.	<ul style="list-style-type: none"> <li>• Fair Housing</li> </ul>

*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-9**.

**Table IV-9  
Public Services and Facilities**

Public Facility	Location
City Hall	550 S. Vicentia Avenue
Auburndale Recreation Center	1045 Auburndale Street
Brentwood Park Center	1646 Dawnridge Drive
Butterfield Park	1886 Butterfield Drive
Citrus Park	1250 Santana Way
City Park	930 E. 6 <sup>th</sup> Street
Corona Municipal Airport	1901 Aviation Drive
Eagle Glen Park	4190 Bennett Avenue
El Cerrito Sports Park	7500 El Cerrito Road
Fiesta Bandshell	930 E. 6 <sup>th</sup> Street
Fresno Canyon	Palisades Drive and Green River Road
Historic Civic Center Community Room	815 W. Sixth Street
Historic Civic Center Theater	815 W. Sixth Street
Mountain Gate Park	3100 S. Main Street
Promenade Park	615 Richey Street
River Road Community Center	1100 W. River Road
Sage Open Space	Sage Avenue and Ontario Avenue
Santana Park	598 Santana Way
Senior Center	921 S. Belle Avenue
Victoria Park Community Center	312 9 <sup>th</sup> Street

Source: City of Corona, 2015.

*Employment in Corona*

A variety of career opportunities are available in Corona with large employers, such as those shown in **Table IV-10**.

**Table IV-10  
Public Services and Facilities**

Employer	Employees	Location
Corona-Norco Unified School District	2,459	2820 Clark Avenue, Norco
Corona Regional Medical Center	1,100	800 S. Main St
Kaiser Permanente	825	2055 Kellogg Ave
City of Corona	801	400 S. Vicentia Ave
Fender USA Corona	800	301 Cessna Circle
All American Asphalt	679	400 E. 6 <sup>th</sup> St
Actavis	626	311 Bonnie Circle
CIRCOR	600	2301 Wardlow Circle
Monster Energy	475	1 Monster Way
TWR Framing Enterprises	465	1661 Railroad Street

Source: City of Corona Comprehensive Annual Financial Report, 2014.

*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 36 fixed-routes, eight CommuterLink routes, and Dial-A-Ride services using 266 vehicles. 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-11  
Riverside Transit Agency (RTA) Bus Lines in Corona**

Route	Description
1	UCR – Riverside Downtown Terminal/Metrolink Station – Corona Metrolink
3	Swan Lake M.H. Park – Corona Transit Center (Norco) - Corona
206	Temecula – Murrieta – Lake Elsinore – Corona Transit Center
216	Riverside Downtown Terminal to Village at Orange – Corona – Orange County

Source: RTA, 2015.

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.

Transit fares depend on the type of user and number of trips purchased. The base fare is \$1.50 for a one-way trip, with seniors and disabled persons eligible for a discounted rate of \$0.70. A 30-day pass is available for \$50.00, with a discount for youth (grades 1-12) (\$35.00), and a discount for seniors and disabled persons (\$23.00). Children under 46" and under can ride free of charge.

Corona also has fixed bus route transportation services, called Corona Cruisers, and it is designed to meet the various transit needs of the community. 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 and persons with disabilities receive a discounted rate of \$0.70 per ride. Day passes for the general public is \$4.00, and seniors and persons with disabilities are charged \$2.00.

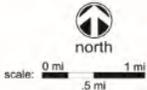
**Map IV-3** shows public facilities and employers in relation to public transportation routes. Majority of the large employers and public facilities are located within ½ to 1 mile from a public transit line or train. There are two public parks that are more than a mile away are Eagle Glen Park and Mountain Gate Park. Eagle Glen Park located on 4190 Bennett Avenue is 1.25 miles from the Red Line Metro. This park has 13.47 acres and has many amenities including a softball field, tennis court, soccer field, restrooms, a picnic and barbecue area, covered shelter and children's play equipment. Mountain Gate Park, located on 3100 S. Main Street, is 3.3 miles from public transit line or train. This park covers 21.07 acres and has many amenities including a softball field, tennis court, basketball court, jogging course, children's play equipment, and a barbecue and picnic area.

However, these parks are not considered an impediment to fair housing choice. There are a number of alternative parks nearby public transit that are accessible to the community. Additionally, major transit lines service areas where there are high population densities.

Map IV-3  
Transit Access to Public Facilities and Employers



# City of Corona



**PUBLIC FACILITIES**

- |                                       |   |
|---------------------------------------|---|
| <b>A</b> City Hall                    | <b>K</b> Fresno Canyon                        |
| <b>B</b> Auburndale Recreation Center | <b>L</b> Historic Civic Center Community Room |
| <b>C</b> Brentwood Park Center        | <b>M</b> Historic Civic Center Theater        |
| <b>D</b> Butterfield Park             | <b>N</b> Mountain Gate Park                   |
| <b>E</b> Citrus Park                  | <b>O</b> Promenade Park                       |
| <b>F</b> City Park                    | <b>P</b> River Road Community Center          |
| <b>G</b> Corona Municipal Airport     | <b>Q</b> Sage Open Space                      |
| <b>H</b> Eagle Glen Park              | <b>R</b> Santana Park                         |
| <b>I</b> El Cerrito Sports Park       | <b>S</b> Senior Center                        |
| <b>J</b> Fiesta Bandshell             | <b>T</b> Victoria Park Community Center       |

**EMPLOYER**

- |   |                                   |
|---|-----------------------------------|
| <b>1</b> Corona-Norco Unified School District | <b>6</b> All American Asphalt     |
| <b>2</b> Corona Regional Medical Center       | <b>7</b> Actavis                  |
| <b>3</b> Kaiser Permanente                    | <b>8</b> CIRCOR                   |
| <b>4</b> City of Corona                       | <b>9</b> Monster Energy           |
| <b>5</b> Fender USA Corona                    | <b>10</b> TWR Framing Enterprises |

**TRANSPORTATION**

**Riverside Transit Agency**

- Line 1
- Line 3
- Line 206
- Line 216

**Metrolink**

- METROLINK
- Corona Cruiser**
- Red Line
- Blue Line

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, the nature and extent of fair housing complaints, and results of fair housing testing/audits.

The City of Corona contracts 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, age, sex, familial status (i.e. presence of children), disability, ancestry, marital status, age, source of income, sexual orientation, genetic information, or other arbitrary factors."

FHCRC provides programs and services focused on eliminating housing discrimination, general housing assistance, and education and outreach activities to residents in the Riverside County. The comprehensive Fair Housing services include:

- **Expanding Affordable Housing Opportunities:** Educate the public on the home buying process; advocate for affordable and accessible housing from a public policy perspective; work in partnership with developers; and inform first time home buyers about down payment assistance program information.
- **Housing Rehabilitation:** Include information about the City's Residential Rehabilitation Program with the FHCRC's outreach materials.
- **Public Policies and Programs Affecting Housing Development:** Advocate for fair zoning laws; combat "not in my back yard" syndrome; monitor the use of eminent domain and provide appropriate education on the topic. Work with the city on local housing ordinances.
- **Outreach to Lenders:** Invite lenders to participate in homebuyer seminars; schedule roundtable communications workshops with lenders; encourage lenders to become a HUD Certified Lender to help low/moderate income clients to become homeowners.
- **Fair Housing Services:** Provide education about tenant-landlord rights and discrimination; train and provide technical assistance to clients; enforce fair housing regulations.
- **Access to Home Purchase Financing:** Enhance access to home purchase financing through homebuyer education; referrals; and financial literacy education and referrals to credit counseling agencies.
- **Foreclosure Prevention Outreach Services:** Conduct one foreclosure prevention workshop per quarter with follow up appointments for additional counseling and case management; provide information on predatory lending, how to budget, credit counseling and financial literacy.

### A. 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 a number of 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 that are vital to improve compliance with the law as follows:

- **Conduct Training Workshops for Renters:** The general types of activities conducted for consumers include a comprehensive fair housing presentation, a question-and-answer booth, and more.
- **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.

The number of education and outreach activities conducted over the last five (5) years by FHCRC within Corona is shown in **Table V-1**.

**Table V-1**  
**Education and Outreach Provided by FHCRC in Corona**

Location and Activity	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	Total
Agency Contacts	5	10	5	7	1	23
Booths	1	3	2	1	0	6
Community Events	1	1	2	1	1	5
Community Meetings	7	9	6	8	8	38
Literature Distribution	4,028	2,090	1,963	1,118	671	9,842
Presentations						
<i>Community</i>	1	1	1	1	0	3
<i>Government</i>	0	1	0	0	0	1
Workshops						
<i>Community</i>	1	2	0	4	0	6
<i>Housing Industry</i>	0	2	2	0	0	4
<i>Realtor</i>	0	0	0	0	0	0
Walk-in Clinics	40	106	112	48	44	350

Source: FHCRC, 2014.

**Table V-2  
Education and Outreach Provided by FHCRC – All Service Areas**

Location and Activity	2009-10	2010-11	2011-12	2012-13	2013-14	Total
Media						
<i>Advertisements</i>	0	0	0	0	0	0
<i>Newsletter</i>	0	0	0	1	1	2
<i>Press Releases</i>	2	0	0	1	2	5
<i>PSAs</i>	3	1	4	5	1	14
<i>Website Hits</i>	955,718	536,392	557,550	741,310	568,676	3,359,646
Other	0	0	0	0	0	0
Staff Training	5	6	4	19	8	42
Tester Training						
<i>New Testers</i>	0	0	77	83	82	242
<i>New Training Sessions</i>	0	0	4	6	10	20
<i>Refresher sessions</i>	0	0	2	2	2	6
Special Events						
<i>Annual Reception</i>	1	1	1	1	1	5
<i>Annual Housing Conference</i>	0	0	0	0	1	1

Source: FHCRC, 2014.

**B. Fair Housing Enforcement**

*Discrimination Complaint Intake and Investigation*

FHCRC responds to discrimination inquiries and complaints in an expedient manner, relying on approximately 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 State and Federal protected categories which include Race, Color, National Origin, Religion, Sex, Familial Status, Disability, Marital Status, Sexual Orientation, Ancestry, Age, Source of Income and Arbitrary Characteristics. The State of California has identified Marital Status, Sexual Orientation, Ancestry, Age, Source of Income and Arbitrary Characteristics as additional protected classes.

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), Attorney or Department of Justice (DOJ).

During the five (5) year period studied, FHCRC has assisted many Corona residents with general housing inquiries. There were 200 discrimination complaints made to FHCRC. **Table V-3** shows the basis of FHCRC discrimination complaints.

**Table V-3**  
**Fair Housing Discrimination Complaints by Basis**

Basis	2009-10	2010-11	2011-12	2012-13	2013-14	Total
Age	1	4	3	3	2	13
Ancestry	0	0	0	0	0	0
Arbitrary	0	10	4	2	0	16
Color	0	0	0	0	0	0
Familial Status	0	5	5	7	3	20
Gender	0	0	1	1	0	2
Marital Status	0	0	0	1	1	2
Mental Disability	3	2	2	1	1	9
National Origin	1	7	4	2	2	16
Physical Disability	5	14	8	21	9	57
Race	0	17	8	13	4	42
Religion	0	0	0	0	0	0
Sexual Orientation	0	0	0	0	0	0
Source of Income	0	13	3	4	3	23
<b>Total:</b>	<b>10</b>	<b>72</b>	<b>38</b>	<b>55</b>	<b>25</b>	<b>200</b>

Source: FHCRC, 2014.

The total number of fair housing discriminations complaints fluctuates between each fiscal year. However, physical disability and race were still the most frequently cited reasons why complainants felt discriminated against. Together, allegations of discrimination on the basis of physical disability or race accounted for 99 out of 200 complaints or 49.5 percent of all discrimination complaints.

**Table V-4** shows the findings and disposition of the 200 discrimination complaints received by FHCRC in the last five (5) years. Out of the 200 discrimination complaints, 148 (74 percent) had inconclusive evidence, and 19 (9.5 percent) of allegations were sustained by FHCRC.

**Table V-4  
Fair Housing Discrimination Complaints: Findings and Disposition**

<b>Findings</b>	<b>2009-10</b>	<b>2010-11</b>	<b>2011-12</b>	<b>2012-13</b>	<b>2013-14</b>	<b>Total</b>
Inconclusive Evidence	5	44	35	45	19	<b>148</b>
No Evidence	2	18	3	8	6	<b>37</b>
Pending Finding	0	0	0	0	0	<b>0</b>
Sustains Allegation	3	10	0	3	3	<b>19</b>
<b>Total:</b>	<b>10</b>	<b>72</b>	<b>38</b>	<b>55</b>	<b>25</b>	<b>200</b>
<b>Disposition</b>	<b>2009-10</b>	<b>2010-11</b>	<b>2011-12</b>	<b>2012-13</b>	<b>2013-14</b>	<b>Total</b>
Client Withdrew	8	39	34	42	19	<b>142</b>
No Enforcement Possible	0	24	4	10	6	<b>44</b>
Referred-Private Attorney	1	0	0	1	0	<b>2</b>
Referred to DFEH	0	2	0	0	0	<b>2</b>
Referred to HUD	1	4	0	1	0	<b>6</b>
Pending Finding	0	0	0	0	0	<b>0</b>
FHF Successful Conciliation	0	4	0	1	3	<b>8</b>
<b>Total:</b>	<b>10</b>	<b>72</b>	<b>38</b>	<b>55</b>	<b>25</b>	<b>200</b>

Source: FHCRC, 2014.

**C. 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, but must refer these complaints 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 September 30, 2013, there were 90 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.

HUD annually compiles data on housing discrimination complaints filed with HUD or FHAP agencies and issues an Annual Report on Fair Housing to Congress. The most recent Annual Report on Fair Housing was issued by HUD Secretary Julián Castro on November 7, 2014 covering the period of October 1, 2011 to September 30, 2013. The Annual Report on Fair Housing indicates that the overall number of housing discrimination complaints filed with HUD and FHAP declined each fiscal year from 2010-13. **Table V-5** provides information on the complaints received by HUD and FHAP during this period for the top eight bases of discrimination.

**Table V-5**  
**HUD and FHAP Discrimination Complaints, 2010-13**

Basis of Discrimination	2010		2011		2012		2013	
	No.	%	No.	%	No.	%	No.	%
Disability	4,389	48%	4,498	48%	4,379	50%	4,429	53%
Race	3,483	34%	3,025	32%	2,597	29%	2,337	28%
Familial Status	1,560	15%	1,425	15%	1,301	15%	1,149	14%
National Origin	1,177	12%	1,195	13%	1,114	13%	1,040	12%
National Origin - Hispanic or Latino	722	7%	759	8%	691	8%	629	8%
Sex	1,139	11%	1,033	11%	1,067	12%	985	12%
Retaliation	707	7%	856	9%	970	11%	928	11%
Religion	287	3%	262	3%	229	3%	220	3%
Color	219	2%	185	2%	155	2%	170	2%
<b>Total:</b>	<b>10,155</b>		<b>9,354</b>		<b>8,818</b>		<b>8,368</b>	

Source: HUD Annual Report on Fair Housing 2012-2013, November 7, 2014.

<http://portal.hud.gov/hudportal/documents/huddoc?id=2012-13annreport.pdf>

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

Nationwide, the share of complaints filed under each basis has remained relatively stable during the period represented in the report. However, the overall number of discrimination complaints decreased slightly in the prior five (5) years. Race continues to be the second most common basis of complaints filed with HUD and FHAP agencies. Familial status, the third most common basis of housing complaints, but has recently decreased since as well. 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. During the prior four (4) years, DFEH has not received any cases from the City of Corona.

All complaints to HUD and FHAP agencies must specify the section of the Fair Housing Act that was allegedly violated or would have been violated. HUD and FHAP agencies record these discriminatory practices in categories known as "issues." **Table V-6** shows the number of complaints filed with HUD and FHAP agencies from 2010 to 2013, broken down by issue. If a single complaint alleged multiple issues, it was counted under each issue alleged.

**Table V-6  
Issues in HUD & FHAP Complaints, 2010-13**

Complaint Issue	2010		2011		2012		2013	
	No.	%	No.	%	No.	%	No.	%
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%
Failure to Make a Reasonable Accommodation	2,556	25%	2,408	26%	2,487	28%	2,543	30%
Refusal to Rent	2,405	24%	2,239	24%	2,317	26%	2,273	27%
Coercion or Intimidation, Threats, Interference, and Retaliation	1,478	15%	1,650	18%	1,913	22%	1,884	23%
Discriminatory Notices, Statements or Advertisements	937	9%	784	8%	936	11%	986	12%
Discriminatory Financing	511	5%	442	5%	383	4%	433	5%
False Denial or Representation of Availability	256	3%	250	3%	237	3%	246	3%
Failure to Permit a Reasonable Accommodation	203	2%	207	2%	204	2%	194	2%
Refusal to Sell	205	2%	142	2%	190	2%	170	2%
Non-Compliance with Design and Construction Requirements	169	2%	90	1%	106	1%	114	1%
Steering	84	1%	62	1%	81	1%	80	1%
Refusal to Provide Insurance	2	<0.5%	0	0%	4	<0.5%	6	<0.5%
Redlining	6	<0.5%	2	<0.5%	11	<0.5%	5	<0.5%
<b>Number of Complaints Filed</b>	<b>10,155</b>							

Source: HUD Annual Report on Fair Housing 2012-2013, November 7, 2014.

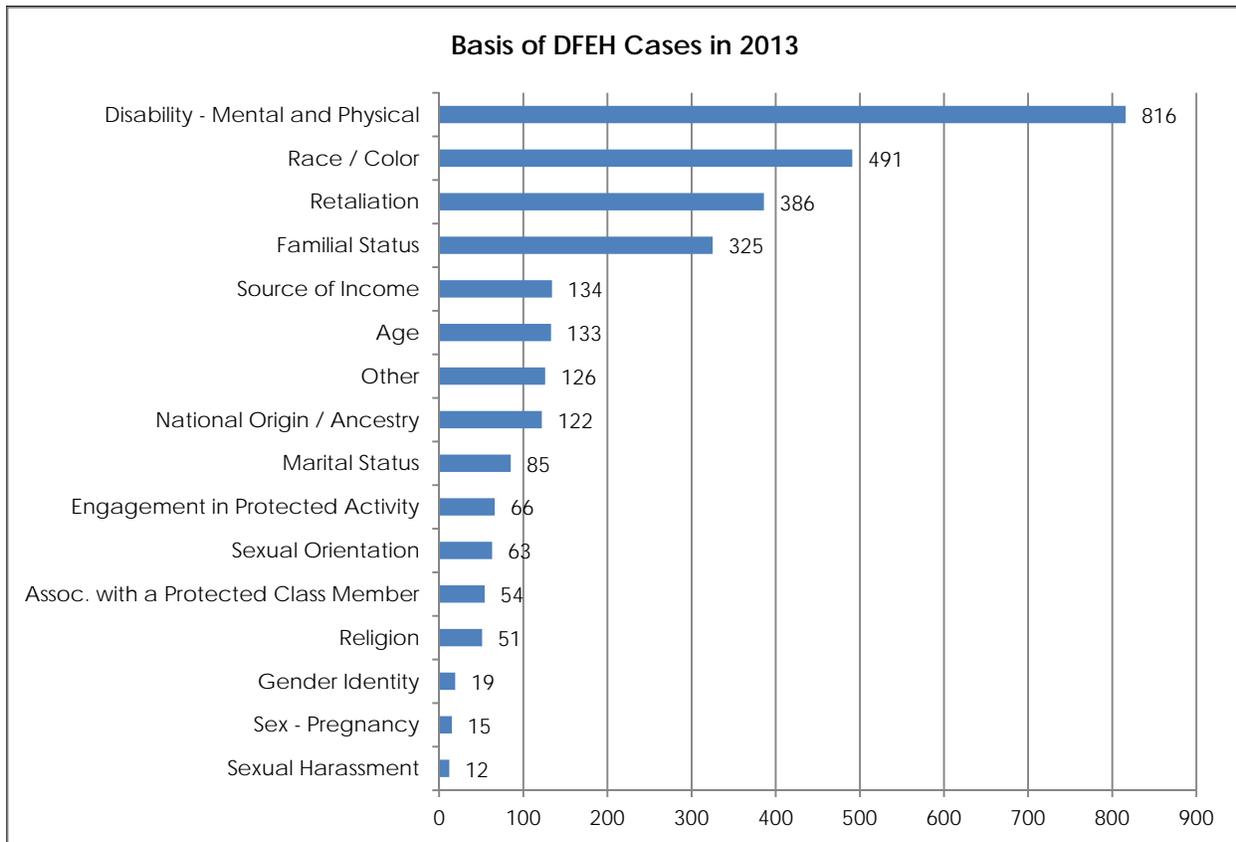
<http://portal.hud.gov/hudportal/documents/huddoc?id=2012-13annreport.pdf>

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

**D. State of California Fair Housing Enforcement**

The State Department of Fair Employment and Housing (DFEH) is the state agency responsible for investigating housing discrimination complaints. As discussed in the previous section, DFEH is the only HUD-approved FHAP agency in the State of California. DFEH's mission is to protect California residents from employment, housing and public accommodation discrimination, and hate violence. **Graph V-1** provides the basis data from the most recent report available showing the 2,898 different bases of discrimination associated with 1,250 cases referred to DFEH from across the state in calendar year 2013.

**Graph V-1  
State Department of Fair Employment and Housing Cases**



Source: DFEH website: <http://www.dfeh.ca.gov/Statistics.htm>

**E. 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. As illustrated in **Table V-6**, housing discriminatory complaints regarding coercion or intimidation, threats, interference, and retaliation filed with HUD and FHAP agencies, has remained steady at 13-15 percent for the last four years, suggesting that discrimination most closely associated with hate crimes may be on the rise in housing discrimination.

The HUD and FHAP findings are further substantiated in Corona by crime reports to the

Federal Bureau of Investigation (FBI). The FBI classifies hate crimes into one of five (5) primary bias motivation categories, including: race, religion, sexual orientation, ethnicity or disability. **Table V-7** summarizes the hate crime incidents by bias motivation as reported by the FBI<sup>1</sup> for calendar years 2008-20.

**Table V-7**  
**Hate Crime Incidents Reported to the FBI in Corona 2008 – 12**

Calendar Year	Race	Religion	Sexual Orientation	Ethnicity	Disability	Total
2012	1	0	1	1	0	3
2011	1	0	0	0	0	1
2010	1	0	0	1	0	2
2009	1	1	2	1	0	5
2008	3	1	1	1	0	6
<b>Total:</b>	<b>7</b>	<b>2</b>	<b>4</b>	<b>4</b>	<b>0</b>	<b>17</b>

Source: FBI Hate Crime Incidents by State and Agency, 2008-12.  
[http://www.fbi.gov/about-us/investigate/civilrights/hate\\_crimes](http://www.fbi.gov/about-us/investigate/civilrights/hate_crimes).

In Corona, there were a total of 17 hate crimes reported to the FBI during 2008 to 2012. The most prevalent hate crime bias motivation reported was race (41.1 percent of all cases). The relatively low occurrence of hate crimes within the community 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.

**F. 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 conciliating or otherwise addressing the fair housing cases that were investigated on behalf of the City of Corona during this time period; therefore, there is no litigation to report.

<sup>1</sup> FBI Hate Crime Incidents by State and Agency, 2008-12. [http://www.fbi.gov/about-us/investigate/civilrights/hate\\_crimes](http://www.fbi.gov/about-us/investigate/civilrights/hate_crimes)

Previous chapters of this A.I. study 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.

**A. Prior-Identified Impediments Remaining as Part of the 2015 A.I.**

The 2010-14 City of Corona A.I. identified four (4) impediments to fair housing choice. Impediment 1 was removed, Impediment 2 is in progress, Impediment 3 is unresolved and Impediment 4 is resolved. The following impediments are included in the 2015 A.I. and will be addressed through the implementation of the Fair Housing Plan represented in **Table VI-1**.

- 1. Impediment No. 1 (formerly 2010-14 Impediment No. 2). Lack of Access to Home Improvement Financing.** The inability to fund home rehabilitation was identified in the 2010-14 A.I. as an impediment to lower and moderate income households and Hispanic households. According to the 2010-14 A.I., the CDBG target areas are located 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 Hispanic persons than the rest of the City. These groups are more likely to be denied private home improvement loans.

**2015 Status: In Progress.** Data suggests that the income and demographics of the CDBG target areas has not changed in a substantial way since 2010. Further, the housing stock continues to age and access to home improvement loans for low- and moderate-income homeowners remains a challenge.

**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.

- 2. Impediment No. 2 (formerly 2010-14 Impediment No. 3). Limited Access to Home Purchase Loans.** Black 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 2010-14 A.I., Hispanic households comprised 40 percent of the City's population, but they only represented 21 percent (827 out of 3,981) of conventional home purchase loan applicants in 2008 and had the second highest denial rate (27 percent). Black applicants, which represented 3 percent of applicants (111 out of 3,981) had the same denial rate as Hispanic households. American Indians had the highest denial rate (50 percent), however only 4 out of 3,981 applicants were American Indian thus this is not statistically significant. The denial rate for conventional home purchase loan applications in 2008 was nearly twice as high for Hispanic and Black households compared to White and Asian and Pacific Islander households, which had denial rates of 16 percent and 15 percent, respectively.

**2015 Status: Unresolved.** According to the 2007-11 American Community Survey (ACS), the Hispanic population grew slightly, comprising 42.8 percent of the City's

population. However, the number of Hispanics that applied for conventional home purchase loans decreased. Out of the 2,248 conventional home purchase loan applications in 2012, only 11.6 percent were Hispanics. While Hispanics still had one of the lowest approval rates amongst groups that applied for all home loans, their approval rate did improve. In 2012, only 11.5 percent of Hispanic applicants were denied of a conventional home purchase loan an improvement from the 27.0 percent denial rate in 2008 according to the Home Mortgage Disclosure Act (HMDA) data.

African Americans represented 5.4 percent of the City's population, and only 1.5 percent applied for conventional home purchase loans. The denial rate of 23.5 percent is relatively similar what it was in 2008.

Differences in approval rates for home loan applications amongst both 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 dramatic drop in the number of conventional home purchase loan applications for Hispanics and African Americans could be subject to additional inquiry and examination.

**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.

**B. 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**

Impediment		Recommendations	Lead Agency	Timeframe
Impediment No. 1	Lack of Access to Home Improvement Financing	Data suggests that the income and demographics of the CDBG target areas has not changed in a substantial way since 2010. Further, the housing stock continues to age and access to home improvement loans for low- and moderate-income homeowners remains a challenge. 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 community outreach effort to ensure that available HOME and CDBG resources are deployed quickly to maintain in 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.	Corona Community Development Department	July 1, 2015 – June 30, 2020
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.	Corona Community Development Department	July 1, 2015 – June 30, 2020

## Signature Page

I, Joanne Coletta, Community Development Director 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.

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Joanne Coletta  
Community Development Director

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Date